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June 29, 1998

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Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Amendment of Parts 21 and 74 To Enable Multipoint Distribution Service and
Instructional Television Fixed Service Licensees To Engage In Fixed Two-Way
Transmissions -- MM Docket No. 97-217 and RM-9060

Dear Ms. Salas:

Pitt Community College ("Pitt") hereby responds to the Commission's June 12, 1998 Public Notice
in the above-referenced proceeding by urging the Commission to expeditiously adopt new rules and policies
consistent with the proposals advanced by the over 110 wireless cable operators, ITFS licensees, MDS
licensees and equipment vendors that commenced MM Docket No. 97-217 more than fifteen months ago
(the "Petitioners").

Pitt is a community college located in North Carolina which provides a broad array of educational
services to residents. Pitt was recently awarded an authorization to operate ITFS channels in the Greenville,
North Carolina market. In addition, Pitt has entered into an excess capacity leasing arrangement with
Wireless One of North Carolina, Inc. ("WONC") which provides for the full implementation of a unique
statewide wireless cable system.

Pitt believes that the Petitioners are to be applauded for crafting a regulatory approach that deftly
balances the pressing need for expedited processing of applications and deployment of new services against
the requirement for reasonable protection against interference. Pitt notes with approval that the Petitioners
are proposing to retain the existing 45 dB and 0 dB co-channel and adjacent channel desired-to-undesired
interference protection standards, are proposing a conservative methodology for determining whether a
given proposed response station system will meet those standards, and are proposing that the operator of
any response station found to cause harmful electrical interference cure that interference. Pitt is particularly
concerned that proposals advanced by the Catholic Television Network ("CTN"), which apparently already
has secured licenses for the facilities it desires, would substantially delay ITFS licensing of others, without
any significant improvement in the operating environment. The Petitioners' proposal is highly protective
against interference, and the burdens proposed by CTN will impose costs far greater than the minuscule
benefits of additional protection. As a result, Pitt believes that the Petitioners' proposed interference
protection rules and policies are fully protective of our interests, and we support their adoption.

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Similarly, the Commission should reject the entreaties of those opposed to the Petitioners' well-conceived proposals for reforming the application process. Pitt has already been substantially delayed by ITFS application processing delays, and the proposals advanced by the Petitioners for streamlining the system should be adopted to assure that the anticipated rush of applications for two-way facilities not result in processing gridlock. The benefits of speeding deployment of new facilities, whether one-way or two-way, far outweigh any potential benefits of the application processing system CTN advocates. The history of ITFS has shown that periodic filing windows do not work, and the alternative approach advanced by the Petitioners does.

The Commission should also reject those proposals that would cripple the ability of WONC to respond to marketplace demand for two-way broadband services. Potential broadband customers will undoubtedly demand rapid inauguration service, and the cumbersome testing plan advanced by CTN will prove unworkable. Because our wireless cable partner will be competing against a variety of other providers of two-way services that are immune to regulatory delay, it is essential that the Commission's new rules permit the rapid inauguration of two-way services, without application processing delays or burdensome testing requirements.

Finally, Pitt believes it is important for the Commission to assure that the substantial benefits of two-way technology are not only available for commercial applications, but can also be used by educators. Unlike proposals by CTN and BellSouth that would limit return paths to MDS channels or the guardband proposal by CTN that would in many markets effectively preclude the use of most ITFS channels for return paths by requiring unnecessary frequency separation, the Petitioners' proposal allows all ITFS licensees to use their own channels for return path applications if they choose, rather than artificially limiting return paths in a way that precludes use by many ITFS licensees.

Thank you for your consideration of the views of Pitt representatives.

Respectfully submitted,



Daniel A. Bain  
Pitt Community College

cc: Hon. William E. Kennard  
Hon. Susan Ness  
Hon. Harold Furchtgott-Roth  
Hon. Michael K. Powell  
Hon. Gloria Tristani  
Roy Stewart  
Keith Larson  
Barbara Kreisman  
Charles Dziedzic  
Michael Jacobs  
David Roberts