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February 14, 2001

Chairman Powell
Commissioner Furchgott-Roth
Commissioner Ness
Commissioner Tristani
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

Re: FCC 00-455, ET Docket No. 00-258/RM-9920 and 9911

Dear Commissioners:

I am concerned about the future of the ITFS spectrum, which is under assault in the Commission's Notice of Proposed Rule Making on 3G spectrum allocations that was released January 5, 2001. ITFS is an important part of our educational program at Catawba Valley Community College. Moreover, preservation of the full ITFS band is absolutely critical if wireless broadband is to become a reality not only for our students but also for our entire community.

As you are aware, recent rule changes have opened the ITFS spectrum to the implementation of wireless two-way video and broadband data services, including high speed Internet access. The educational power of ITFS has been expanded under the digital two-way rules to provide advanced learning services, interactive video, and wireless broadband Internet. As distance learning becomes more robust and interactive, ITFS offers educational institutions throughout the country an affordable high-speed on-ramp to the broadband Internet for students and adult learners in the classroom, at home and at work. This goal was recently cited as the first priority for policymakers by the bipartisan Congressional Web-Based Education Commission. In addition, fixed wireless broadband promises to bring a competitor to DSL and cable modem technologies to our community, making broadband access not only more widely available but also more affordable.

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ITFS does not only benefit schools, students and adult learners, however. In addition to the broad range of community programming currently carried on ITFS spectrum, the recent two-way order has filled a void where legislation and regulation have failed to produce affordable, ubiquitous broadband Internet access for Americans. Working in conjunction with wireless communications companies, ITFS spectrum is being used to bring broadband to underserved populations in rural, urban and otherwise isolated communities nationwide. ITFS licensees are therefore serving the educational community as they help the nation and the Commission to bridge the Digital Divide.

If the Commission reallocates any part of the ITFS spectrum for 3G mobile device services, the capacity, usefulness, and value of ITFS would be significantly diminished. Even if only part of the spectrum is taken away, many educational institutions would lose their ITFS service altogether, while others would face new equipment costs, service disruption and cutbacks, lower quality of service and signal interference. In either scenario, the ITFS community would be incapable of supporting advanced wireless services and promoting the development of broadband services to the educational community and to underserved communities nationwide.

If the ITFS spectrum is compromised in any way, these public benefits will be lost. We at the Catawba Valley Community College hope that you will support us in maintaining the integrity of our spectrum and in keeping this tremendous educational resource alive and strong.

Sincerely,



Cuyler A. Dunbar
President

ITFS Utilization Plan

February 2, 2001

Catawba Valley Community College

Projected ITFS Channel Usage

Category of IP service	Peak Usage	Hours for Peak Usage	Agregate Usage	Applications Supported	Number of Courses utilizing services Total number of sections offered 3500
Electronic Mail/ Messaging	64 Kb/s	7:30 am - 10:30 pm	64 Kb/s	Inter Campus Mail, Internet Mail	100%
Web Content	1 - 10 Mb/s	24 Hours	5 Mb/s	Student Portal/ Self service applications	50%
File Transfer	1 - 45 Mb/s	7:30 am -10:30 pm	200 Kb/s	Course down load, Backup services	10%
Video/ Audio content	1 Mb/s	7:30 am -10:30 pm	1 Mb/s	Curriculum Courses	10%
Video Conferencing	1 - 10 Mb/s	7:30 am -10:30 pm	1 Mb/s	Counseling	5%
High Resolution Video	5.4 Mb/s	7:30 am -10:30 pm	NA	CVCC Intercampus meetings, Public Meetings, Satellite Campus Meetings	5%
Inter Campus Connectivity	40 Mb/s	24 Hours	10 Mb/s	LAN to LAN	100%
Inter Campus Voice Over IP	1.5 Mb/s	7:30 am - 8:30 pm	512 Kb/s	Telephony	25%

CVCC will utilize the bandwidth for intercampus and Satellite campus data, video and audio connections.

Gaston College

Projected ITFS Channel Usage

Category of IP service	Peak Usage	Hours for Peak Usage	Agregate Usage	Applications Supported	Number of Courses utilizing services
Electronic Mail/ Messaging	64 Kb/s	7:30 am - 10:30 pm	64 Kb/s	Inter Campus Mail, Internet Mail	100%
Web Content	1 - 10 Mb/s	24 Hours	5 Mb/s	Student Portal/ Self service applications	50%
File Transfer	1 - 45 Mb/s	7:30 am -10:30 pm	200 Kb/s	Course down load, Backup services	10%
Video/ Audio content	1 Mb/s	7:30 am -10:30 pm	1 Mb/s	Curriculum courses	10%
Video Conferencing	1 - 10 Mb/s	7:30 am -10:30 pm	1 Mb/s	Counseling	5%
High Resolution Video	1 - 10 Mb/s	7:30 am -10:30 pm	1 Mb/s	Public Meetings	5%
Inter Campus Connectivity	40 Mb/s	24 Hours	10 Mb/s	LAN to LAN	100%
Inter Campus Voice Over IP	1.5 Mb/s	7:30 am - 8:30 pm	512 Kb/s	Telephony	25%

Gaston College plans to install receivers at the Main Campus and the Lincolnton Campus.

Mitchell Community College

Projected ITFS Channel Usage

Category of IP service	Peak Usage	Hours for Peak Usage	Agregate Usage	Applications Supported	Number of Courses utilizing services Total number of sections offered 3500
Electronic Mail/ Messaging	64 Kb/s	8:00 am - 10:00 pm	64 Kb/s	Inter Campus Mail, Internet Mail	100%
Web Content	1.54 Mb/s	24 Hours	2 Mb/s	Student Portal/ Self service applications	30%
File Transfer	1.54 Mb/s	7:30 am -10:30 pm	100 Kb/s	Course down load, Backup services	20%
Video/ Audio content	.75 Mb/s	8:00 am - 10:00 pm	.75 Mb/s	Curriculum courses	10%
Video Conferencing	NA	NA	NA	NA	
High Resolution Video	NA	NA	NA	NA	
Inter Campus Connectivity	5 Mb/s	24 Hours	5 Mb/s	LAN to LAN	100%
Campus Voice Over IP	1.5 Mb/s	7:30 am - 8:30 pm	512 Kb/s	Telephony	50%

At Mitchell we plan to use the bandwidth for intercampus connection, web curricula, and VOIP.