DOCKET FILE COPY ORIGINAL

RECEIVED
MAR 9 2001
FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's Rules to Allocate Spectrum Below 3 GHz For Mobile and Fixed Services to Support the Introduction of New Advanced Wireless Services, including Third Generation Wireless Systems	)	ET Docket No. 00-258
	)	
Petition for Rulemaking of the Cellular Telecommunications Industry Association Concerning Implementation of WRC-2000; Review of Spectrum and Regulatory Requirements for IMT-2000	)	RM-9920
	)	
Amendment of the U.S. Table of Frequency Allocations to Designate the 2500-2520/ 2670-2690 MHz Frequency Bands for the Mobile-Satellite Service	)	RM-9911

To: The Commission

REPLY COMMENTS OF THE COUNCIL OF THE GREAT CITY SCHOOLS

The Council of the Great City Schools, the coalition of over 50 of the nation's largest central city school districts, is pleased to submit our reply to selected comments filed pursuant to the Commission's January 5, 2001 Notice of Proposed Rulemaking (NPRM) on the possible use of frequency bands below 3GHz to support the introduction of new advanced wireless services (FCC 00-455).

The Council of the Great City Schools opposes the reallocation of the 2500-2690 MHz band away from educational institutions, the predominant entities operating Instructional Television Fixed Services (ITFS) in this portion of the spectrum. As an educational resource, the spectrum is of great worth, particularly to the large city school systems that enroll the largest number of students, employ the highest number of teachers, and occupy the greatest number of school buildings. The Council of the Great City Schools represents approximately 30% of the nation's Hispanic students, 35% of the nation's African American students, and 25% of the nation's children living in poverty. The

No. of Copies rec'd 0+8
List ABCDE

arguments for preserving the 2500-2690 MHz band for educational purposes were made in the original comments submitted by the Council of the Great City Schools, and the spirit of those arguments were echoed repeatedly by an endless number of organizations within the education community. However, the absolute need for using the ITFS spectrum for third generation (3G) services was not demonstrated by 3G proponents, nor was the assurance that educational institutions would not be negatively affected. The Council of the Great City Schools restates its opposition to the reallocation of the 2500-2690 MHz band away from educational institutions with the following comments:

1. THE PROPONENTS OF 3G AND THE COMMERCIAL ENTITIES THAT HOPED TO ADOPT THE 2500-2690 MHZ BAND FOR NON-EDUCATIONAL PURPOSES HAVE NOT ADDRESSED THE PROBLEMS THAT ITFS MAY FACE.

Proponents of 3G did not dismiss the notion that relocation on the spectrum or the band sharing options presented to ITFS would produce detrimental effects for the incumbent educational users. Motorola noted that band sharing on 2500-2690 MHz was simply not a feasible option. Also, the difficulties that relocation would cause to education entities are the same problems that cause 3G proponents to seek residence in 2500-2690 MHz, and also reject alternative locations on the spectrum.

2. THERE IS DISAGREEMENT ON THE ABILITY OF 2500-2690 MHZ TO CREATE GLOBAL SPECTRUM HARMONIZATION.

A universal desire by 3G proponents, regardless of their opinion on 2.5 GHz, was to locate a portion of the spectrum that could be used throughout the world, e.g. spectrum that provides global harmonization and global roaming. There is substantial agreement among 3G proponents that another portion of the spectrum (1.7 GHz) provides the best opportunity for international success, and just as substantial disagreement as to whether 2500-2690 MHz would even work in such a capacity. The comments of Lucent Technologies, Inc. directly stated that 2500-2690 MHz would not work in such a venture.

3. A DECISION TO REALLOCATE THE ITFS SPECTRUM WOULD BE PREMATURE, AS WELL AS DAMAGING TO INCUMBENT EDUCATION USERS.

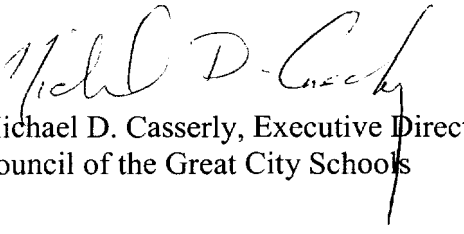
The Council of the Great City Schools feels that a decision that reverses educational progress, particularly in the nation's neediest schools, should never be made. At the very least, however, such a decision must be preceded by intense study. In the NPRM, the FCC stated that, "The anticipated increase in demand for new data services, as well as expected continued increases in mobile telephone service, may be met in part by the introduction of new technologies." This possibility, coupled with commenters' pervasive speculation that current spectrum allocation is sufficient for emerging wireless services, should be more than enough to bring pause to any impending action. Options other than reallocation have not been thoroughly explored. The benefits that ITFS provides to education—repeatedly cited as the most prominent national priority—is well

documented. An undisputed and absolute need to reallocate educational spectrum for advanced wireless services is not documented.

CONCLUSION

The primary interest of the Council of the Great City Schools is to ensure that the neediest schools and school children are not left behind in antiquated schools with inadequate services and equipment. ITFS allows districts to ensure this does not happen, providing what one set of comments referred to as "significant public interest benefits." The lack of findings to the contrary by the FCC, and the hesitancy of 3G proponents to declare 2500-2690 MHz as the sole savior for future advanced services, deepens our position. As the complexity and importance of technology continues to increase, the Council of the Great City Schools repeat our belief that preservation of the 2500-2690 MHz allocation for educational institutions is necessary for the nation's neediest urban school districts to keep pace.

Respectfully Submitted,



Michael D. Casserly, Executive Director
Council of the Great City Schools

Address:
Council of the Great City Schools
1301 Pennsylvania Avenue, NW Suite 702
Washington, D.C. 20004
Phone: 202-393-2427