



Secretary  
Federal Communications Commission  
The Portals  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

October 23, 2003

Re: Reply Comments of University of Cincinnati  
WT Docket 03-66, RM-10586

The University of Cincinnati is licensed on the A and D groups of ITFS, call signs KHX47, WHR662 and WLX805.

For over 30 years the University of Cincinnati has utilized its ITFS channels entirely for video programming related to medical and health education. We have broadcast a mix of programs, both live and taped, presenting patient education topics as well as accredited continuing education in numerous health professions (Pediatrics, Social Work, Nursing, Environmental Health, Internal Medicine, Surgery, and others). ITFS has also been used to disseminate satellite teleconferences of a medical nature to area health care institutions.

Today, the University is in the process of shifting its ITFS use into a broader range of video services. The channels will be programmed and operated by University students as part of an academic degree program in Electronic Media which is already in place and expanding. Our students will be learning about the entire process of video production – not just “concept to completion,” but all the way through the broadcast chain and on-air operations: scheduling, traffic, master control, distribution. The program schedule being developed includes Distance Learning materials for specific University courses, college news and event coverage, professional development training for local business and industry, lifelong learning opportunities for nursing-home-bound senior citizens, as well as programs produced in cooperation with the local community. Receive sites will be installed at points of access to cable systems on both sides of the Ohio River, as well as public and private institutions. All of these plans depend on the retention of part of the ITFS spectrum for traditional video operations.

In addition, the University is contemplating plans to use ITFS to provide two-way wireless broadband services to students, faculty and staff. However, because of

Cincinnati's location on the Ohio River, and terrain issues such as the hills and valleys separating the University's outlying campuses, implementation of these plans will depend on the success of third-generation, non-line of sight technology.

We join our fellow ITFS licensees in fully supporting the band plan proposal of the Coalition, as reflected in the Comments and Reply Comments filed by its representatives from WCA, NIA and CTN; as well as the separate issues raised in separate Comments by NIA and CTN. Specifically, we feel that the current eligibility requirements for ITFS licenses must be retained, and the spectrum not be permitted to be sold outright to any commercial entity; and we strongly agree with the Coalition's position that the ITFS spectrum should be kept free of unlicensed operations.

Respectfully submitted,  
University of Cincinnati

By: \_\_\_\_\_ /s/

H. Michael Sanders  
Director, Electronic Media Communications