

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

In the Matter of)	
)	
Amendment of Parts 1, 21, 73, 74 and 101 of the)	WT Docket No. 03-66
Commission's Rules to Facilitate the Provision of Fixed)	RM-10586
and Mobile Broadband Access, Educational and Other)	
Advanced Services in the 2150-2162 and 2500-2690 MHz)	
Bands)	
)	
Part 1 of the Commission's Rules - Further Competitive)	WT Docket No. 03-67
Bidding Procedures)	
)	
Amendment of Parts 21 and 74 of the Commission's Rules)	WT Docket No. 02-68
With Regard to Licensing in the Multipoint Distribution)	RM-9718
Service and in the Instructional Television Fixed Service)	
for the Gulf of Mexico)	

To: The Secretary, FCC
Attention: The Commission

**REPLY COMMENTS OF THE CALNET CONSORTIUM OF FIVE CALIFORNIA
STATE UNIVERSITY CAMPUSES**

The Calnet consortium substantially and strongly supports the comments submitted by the National Educational Broadband Services Association (NEBSA) in this matter. Calnet consists of five Southern California campuses of the California State University:

California State Polytechnic University, Pomona

California State University, Dominguez Hills

California State University, Fullerton

California State University, Long Beach

California State University, Los Angeles

More than 150,000 matriculated students are enrolled on our campuses, with tens of thousands of additional “non-traditional” students also served. Calnet has successfully operated the “E” group of EBS channels for a quarter century.

Existing EBS Geographic Service Areas (GSAs) in our region, or BRS BTA-wide licenses, already cover the respective BTAs. Calnet therefore has nothing to gain directly from the proposal for the expansion of GSAs that is at the core of NEBSA’s and several other submissions. We nevertheless see great wisdom in the GSA expansion solution in that it results in immediate licensing of EBS spectrum areas adjacent to existing GSAs, including rural areas, thus facilitating the deployment of wireless broadband services in both metropolitan and rural areas. Auctions of EBS spectrum should be avoided to the greatest degree possible. Auctions will not provide the greatest benefit to either educators or students, and they are almost certain to delay and vastly complicate the effective utilization of spectrum that the FCC and all responsible parties desire.

The NEBSA proposal also preserves approximately 200 new licensing opportunities which are identified clearly and should result in viable service area. Calnet supports that aspect of the NEBSA proposal, but suggests that applications for the approximately 200 licenses that under the NEBSA proposal are expected to be available after expansion of GSAs be limited to qualified, accredited educational institutions that are based within the region to be served. This measure will further insure that spectrum is utilized for the maximum benefit of students.

Lastly, Calnet agrees with NEBSA that outstanding EBS licensing issues, including license renewals filed late, must be resolved. An accurate and definitive EBS database is critical

to any solution that may be reached. We urge the Commission to promptly implement the findings and intent of its Declaratory Ruling issued earlier this year.

Respectfully submitted,

The California State University Chancellor's Office on behalf of the Calnet Consortium

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