

October 22, 2008



NATIONAL  
CATHOLIC  
EDUCATIONAL  
ASSOCIATION

*Since 1904*

**VIA Electronic Filing**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
Washington, D.C. 20554

**Re: Reply Comments WT Docket No. 03-66, RM 10586**

Dear Ms. Dortch:

The National Catholic Education Association (NCEA) submits these reply comments in support of the comments filed by the Catholic Television Network ("CTN") in the above-referenced proceeding on September 22, 2008.

NCEA is the largest private professional education organization in the world. The association's membership represents more than 200,000 educators serving over 7.6 million students in Catholic education at every level including pre-school, elementary and secondary schools, colleges and universities, seminaries, and parish religious education programs for public school children.

NCEA is committed to the goal of improving the quality of education for all American children, particularly those 2.2 million enrolled in the more than 7,300 Catholic elementary and secondary schools that serve this nation. America's Catholic schools serve a diverse population. More than half of Catholic schools are located in urban and inner-city neighborhoods, serving children from low and middle income families. Nearly 15% of students in Catholic schools are non-Catholic, and the minority enrollment nationwide is nearly 30% (percentages rise significantly in most inner city schools).

Catholic schools need new tools to support their educational mission. One of those tools is Educational Broadband Service ("EBS") spectrum. NCEA wants to ensure that EBS licenses are available to as many schools as possible without undue burden. Having reviewed the comments filed in this proceeding, NCEA believes that the proposal put forward by CTN is most likely to achieve this goal.

*A Clear Voice for Catholic Education*

CTN has proposed to license unassigned EBS spectrum (so-called "white space") without competitive bidding by first identifying eligible local educators that wish to use the spectrum, and then licensing the spectrum to those entities that serve the most enrolled students in each Basic Trading Area ("BTA"). To be eligible for EBS white space, parties must (1) have a physical presence within the BTA, (2) be an eligible EBS entity under FCC rules, and (3) provide, or propose to provide, educational services to enrolled students within the white space of the BTA. To maximize opportunities for new entrants and inhibit speculation, interested parties would be limited to seeking EBS licenses in just one BTA and one channel group in the BTA.

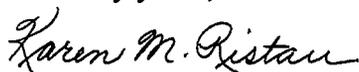
CTN's proposal is similar in many respects to the proposal put forward in comments filed on September 22, 2008 by a large segment of the education community including the American Association of School Administrators, National Association of Independent Schools, Association of Educational Service Agencies, Association of School Business Officials International, Consortium for School Networking, International Society for Technology in Education, National Association of State Boards of Education, National Education Association, National Rural Education Association, Organizations Concerned about Rural Education, and Rural Schools and Community.

Some parties have proposed to license EBS white space through expansion of existing geographic service areas ("GSAs") until they absorb virtually all available white space. GSA expansion proposals are touted as an easy fix to license GSA white space. But, in fact, they would result in random and irrational spectrum assignments to the complete exclusion of new entrants in most major markets. In NCEA's view, licensing EBS white space in this manner would be arbitrary and capricious.

Adoption of the CTN proposal would promote applications from new entrants while not precluding existing licensees from obtaining more spectrum to meet their educational needs. It also would license EBS spectrum to local entities serving the greatest number of students. In addition, it would encourage collaboration among educators, avoid the need for auctions, and require all new licensees to use the spectrum in satisfaction of the FCC's educational use and substantial service requirements.

For all of the reasons above, NCEA believes that the CTN proposal would serve the public interest.

Sincerely yours,



Karen M. Ristau,  
President