

October 22, 2003

Marlene H. Dortch, Secretary
FCC
445 12th St.
Washington, DC 20554

Re: Comment and Reply Comments
WT Docket # 03-66 (RM-10586)
WT Docket # 03-67
MM document # 97-217
WT document # 02-68 (RM-9718)

Dear Ms. Dortch:

Ivy Tech State College, Region 2 North Central, in South Bend, Indiana, submits its comments and reply comments in this proceeding to address significant issues impacting the future of Instructional Technology Fixed Serve (ITFS). Ivy Tech's comments are in support of its understanding of the Federal Communication Commission's mandate to:

- Provide policies and rulings for use of the spectrum that support overall public interest in the US
- Encourage the use of telecommunications to support the improvement of the nation's education system at all levels
- Establish processes that are equitable and provide assurance that the spectrum will be used to improve education
- Support, through its actions, the policies and goals of the government departments such as the department of Education and Department of Commerce that support the use of technologies to bring about systemic changes in our nation's educational system.

Behind these above statements is the realization that the future progress of our citizens depends upon the capability of our educational system to prepare them for the workplace, the communities, and the voting booths. The Commission's policies regarding the ITFS spectrum act as a major determiner in this endeavor.

In this effort, Ivy Tech State College urges the Commissioners to consider only those changes that offer the protection of the spectrum for educational programming, and the opportunity for educational systems to build broadband wireless systems in the ITFS spectrum that expedite the digital data sharing required in the 21st Century.

Ivy Tech State College is a statewide system of 32 campuses, effectually Indiana's community college system, and just one of these campuses has had the availability to license and ITFS channel (Call sign: WHR491, G Group). For the past ten years, Ivy Tech North central, representing three campuses within the system, has provided one-way video distance education for more than 13,000 students, averaging 15 courses a semester. In sharing our educational resources among the campuses, the ITFS system has been a critical and quality methodology allowing rural students to obtain their associates' degrees, find a worthy career or even move on to a four-year college

Ivy Tech Plans for its ITFS Future

With the move from analog to digital signals, Ivy Tech is planning to provide not only two-way microwave video, but run concurrent data streams that provide students continual access to the World Wide Web and other course management systems available. The region has invested in IP video equipment, currently running on land-based T1 lines, as we move to digital broadcasting. Not only was a wing dedicated in our new South Bend building for distance technologies, but also our two other campuses have recently redesigned classrooms to carry two-way video in various classrooms.

In addition, offering broadband wireless opportunities to other institutions and agencies in our communities will provide opportunities that these smaller cities of Warsaw and Elkhart would not normally be provided by commercial operators. This would offer an infinite variety of distance possibilities to each receive site.

Ivy Tech's Support of WCA/NIA/CTN reply comments

Along with my 10-year history at Ivy Tech State College, developing their distance programs as well as the discussion with others involved with educational media over the years, I have developed strong feelings related to the use of the ITFS spectrum. We fully support that WCA/NIA/CTN position and the need to retain current eligibility requirements for educational ITFS licensees. As well, having dealt with public access channel issues in various communities. As cable companies wooed the city managers with many promises of free and public access and educational channels, the 5% set-aside for education is and always will be untenable and unworkable over the long run to benefit the educational community. For many year educational institutions worked in ITFS because it was a system unused and abandoned by commercial interest. The idea of "selling" parts of the educational spectrum runs counter to the spirit of the original formation of the FCC in the 1930s, but many educational institutions have invested heavily in the licenses we protect and would not think of "selling" them.

Broadband wireless and the role ITFS has in its future deployment is a major resource for community colleges such as Ivy Tech, one only waiting for the rules and regulations, development and standardization of equipment at the national level in order to develop. As soon as this becomes solidified, we plan to build out our licensed spectrum with penetration in areas not normally served by commercial interests. All these plans are on hold, and could turn to ashes if this spectrum is taken away, like so many other "protected" areas for education.

Ivy Tech State College urges the Commission to retain the current eligibility requirements for ITFS licensees, to refrain from allowing the spectrum to be taken from the educational community, or even provide educational licensees to right to "sell" their channel groups. We fully support the WCA/NIA/CTN's reply comments, and urge the preservation of our ITFS use.

Regards,

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