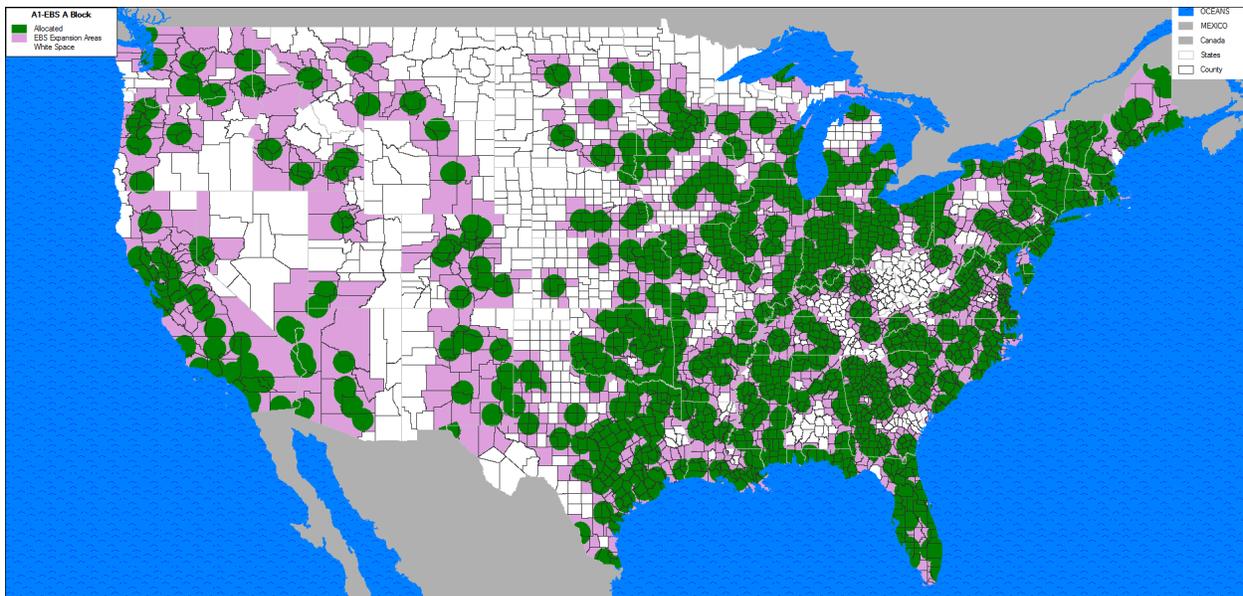


Your Action is Required:
Keep Educational Broadband Spectrum Licenses in the Hands of Educational Institutions
and Provide Rural America Internet Access

Background: The Educational Broadband Service (EBS) was created by the FCC to provide schools and other educational institutions and nonprofit organizations the access to transmit wireless broadband signals over specified radio frequencies. The Service also allowed for the option of school districts and colleges holding these licenses to lease any unused capacity on these channels to commercial operators in exchange for monetary payments in support of educational needs. **On an annual basis, over 2,000 such licenses generate over \$300 million in lease payments to the educational institutions that hold these licenses, and wireless networks using these frequencies have been built in areas covering the homes of 200 million.** As such, the assets held are critical in providing needed additional revenue to schools and educators, providing schools with wireless broadband networks in conjunction with Internet Service Providers, and providing wireless broadband internet to the community at large.

The FCC closed its “window” for accepting new EBS applications in 1995 before schools in most rural areas were aware of the opportunity. In June 2014, three leading organizations representing educational institutions and educational nonprofit organizations and one organization representing commercial wireless operators submitted a Consensus Proposal to the FCC recommending new procedures to allow schools that missed the initial window to submit applications to license the remaining unused and unassigned areas, known as EBS white space.



This map represents and shows areas with and without licenses. Each green shape represents the Geographical Service Area (GSA) of an existing EBS license which may extend up to 35 miles from a designated point. The Consensus Proposal suggests that EBS channels be licensed by counties. If adopted, existing licenses would automatically expand to county borders as shown in the areas shaded purple. Educational institutions or nonprofit educational organizations could apply for licenses in the counties shown in white which are not covered by an existing license.

Notice of Proposed Rulemaking: On April 19th, 2018 the FCC released a Notice of Proposed Rulemaking (“NPRM”), which was adopted May 10th, 2018, providing for a proposed update to the EBS spectrum rules. The new rules are largely influenced by the 2014 Consensus Proposal. The FCC currently seeks comments on establishing three local priority filing windows for new EBS License issuance:

1. First, a window for Existing Licensees, allowing them to expand their service to the county boundaries;
2. Second a Window for Tribal Nations located in rural areas;
3. Third, a window for “New Educational Entities” that do not currently hold any 2.5 GHz EBS Licenses.

The FCC proposes to make any spectrum remaining after these priority windows available for commercial use through competitive bidding.

What Does the NPRM Mean for Educational Institutions: The FCC is currently soliciting comments on a process that will allow Educational Institutions, in the third window for “New Educational Entities”, to obtain EBS licenses. Under the proposed process, accredited institutions and governmental organizations engaged in formal education to enrolled students, of which are deemed to have a local presence, will be eligible to obtain EBS licenses. The narrow proposal of whom is deemed eligible could exclude otherwise qualified educational institutions and nonprofit educational organizations to be denied from obtaining licenses, resulting in the spectrum being put up for auction directly to commercial entities. Current EBS rules have been working well, benefitting schools, communities, lessors and commercial operators in both urban and rural areas. It is Select Spectrum’s belief that the objective should only be to expand the current licenses service areas to county borders and to fix the allocation of new spectrum in EBS white space; which will ultimately keep the licenses in the hands of Educational Institutions.

How Can Educational Institutions Reserve the Right to Obtain an EBS License: Educators and Broadband Access Providers for Rural American Communities (“EBPARC”), founded by Select Spectrum, is an informal coalition of educational institutions that do not have EBS licenses, commercial wireless broadband providers. The EBPARC goal is to assist Educators in submitting comments to the FCC that are supportive of issuing new licenses to educational institutions at zero cost at the earliest possible date, and to retain the original spirit of EBS licenses being owned and controlled by Educational Institutions. The new licenses will support broadband access services, which will improve educational, social and business opportunities in rural communities that only want access to licenses similar to granted decades ago to school systems, colleges and universities.

To achieve this, comments should reflect that Educational Institutions that have not participated in past EBS windows for license assignment should be granted access on a first-come first served application process. Auctions to commercial entities will ultimately dissipate the opportunity for Educational Institutions. If Educators and nonprofit educational organizations request a revision to the current NPRM it will help facilitate a final revision to the rules by the FCC in favor of

Educational Institutions. By participating now, schools without licenses will have a better possibility of obtaining new licenses where there is currently no coverage.

If you agree, please send a letter to the FCC similar to the attached file provided or file a comment on the FCC's ECFS system. If the FCC allows applications, Select Spectrum will assist schools with applications at no cost.

Additional Information:

Select Spectrum is the founding commercial member of EBPARC. Select Spectrum provides spectrum marketing services to educators seeking to lease their spectrum. Since 2010, Select Spectrum clients have signed leases for over 90 EBS licenses committing commercial operators to pay over \$100 million in spectrum lease payments to schools, school districts, colleges, and universities.

If your School, School District, College or University may be Interested in Participating in EBPARC:

Please contact:

Andreas Bitzarakis
Select Spectrum LLC
andreas@selectspectrum.com
820 Great Cumberland Rd
McLean, VA 22102
571-287-8723
<http://selectspectrum.com/home.html>

There is no cost for educational institutions to participate in EBPARC.