*Ex parte* comments for IB docket 16-185

March 18, 2019

My comments relate to WRC-19 Agenda Item 1.13, concerning spectrum above 24.25 GHz.

I recommend no change in the 45.5 - 47 and 47 - 47.2 GHz bands.

NO sharing and compatibility studies have been performed between IMT-2020 systems and the relevant incumbent services in the 45.4 – 47 GHZ and 47 – 47.2 GHz bands. Sharing and compatibility studies for incumbent services were required under Resolution 238 of World Radiocommunication Conference 2015 (WRC-15).

In the absence of ITU Radiocommunication Sector studies, the only sustainable conclusion is that it has not been demonstrated that the incumbent services in either band – the Mobile-Satellite Service, the Radionavigation Service, and the Radionavigation- Satellite Service in the 45.5 – 47 GHz band, and the Amateur and Amateur-Satellite services in the 47 – 47.2 GHz band – can be protected, as required by Resolution 238.

In this regard, the View A proposal is fatally flawed. The absence of studies in the responsible ITU-R task group leaves the proposals unsubstantiated and incapable of adoption.

I am a View B proponent and urge the FCC to accept the proposals of the National Telecommunications Information Administration (NTIA) for no change in the Table of Allocations in the 45.5 – 47 GHZ and 47 – 47.2 GHZ bands.

Respectfully submitted,

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