**Before the**

**Federal Communications Commission**

**Washington, D.C. 20554**

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| In the Matter of  2019 World Radiocommunication Conference Advisory Committee  To: The Commission | **)**  **)**  **)**  **)** | IB Docket No. 16-185 |

**comments of The GPS Innovation Alliance**

The GPS Innovation Alliance (“GPSIA”) hereby provides these comments in response to the Public Notice issued by the Federal Communications Commission (“Commission”) International Bureau on March 11, 2019 in the above captioned proceeding.[[1]](#footnote-1) GPSIA writes in particular to address the draft proposal in Document WAC/085 for an item on the agenda for the 2023 World Radiocommunication Conference (“WRC-23”) seeking spectrum allocations for wireless microphone use under the umbrella of terrestrial electronic news gathering (“ENG”) operations.[[2]](#footnote-2) As the GPSIA explains below, the proposal in Doc. WAC/085 includes a grossly overbroad range of spectrum for study, and the proposed future agenda item cannot be advanced in its current form.

At its March 11, 2019 final meeting, the 2019 World Radiocommunication Conference Advisory Committee (“WAC”) considered a number of proposals that had been agreed by the various informal working groups. In addition, the WAC received for noting only several documents – mostly pertaining to future agenda item proposals for WRC-23 – that had not been agreed in the informal working groups. These documents, including WAC/085, were included in a separate attachment to the PN that included draft proposals “presented for information and not formally agreed by the [WAC].”[[3]](#footnote-3)

GPSIA and other WAC members strongly objected to Document WAC/085 in Informal Working Group 2 (“IWG-2”). They did not object because the document sought new spectrum for ENG/wireless microphone operations after being displaced from spectrum in the UHF frequency range (600-700 MHz) by Commission actions designating spectrum for terrestrial mobile broadband operations incompatible with ENG/wireless microphone use. Instead, the objections were made because Document WAC/085 proposed to find up to 72 MHz of “suitable alternate spectrum” in the range “between 150-2000 MHz,” without meaningful limitation.[[4]](#footnote-4)

GPSIA expressed concern to the proposal’s author about the frequency range in the proposal. GPSIA made clear, and reiterates here, that the radionavigation-satellite service (“RNSS”), in which the U.S. Global Positioning System, the Russian Federation’s GLONASS system, the European Galileo system, and other Global Navigation Satellite Service (“GNSS”) systems operate worldwide in the 1164-1215 MHz, 1215-1300 MHz, and 1559-1610 MHz frequency bands, would, without question, be subject to harmful interference from co-frequency or in some cases adjacent-frequency wireless microphone operations. GNSS and other RNSS applications are highly vulnerable to the type of interference wireless microphones and other terrestrial ENG uses would produce. GPSIA noted that all of the RNSS bands listed above are in the range identified in Doc. WAC/085.

GPSIA urged the authors to focus their proposal on a more narrow range of frequencies that does not intrude upon GPS and GNSS use of the RNSS allocations. Unfortunately, the authors have not narrowed the scope of their proposed item to avoid consideration of the RNSS bands, so GPSIA continues to object to any favorable consideration of this proposal in its current form. In order for any proposal for terrestrial ENG/wireless microphone studies to go forward, the RNSS bands need to be explicitly excluded from any studies and expressly considered not available for purposes of global harmonization.

GPSIA recognizes that there are other segments of the broad 150-2000 MHz range that are used for aviation services, mobile-satellite service, and passive/space science applications. There will clearly need to be more exclusions from the bands to be studied than just the RNSS bands. GPSIA further notes that any other bands that may ultimately be proposed by the United States for consideration for terrestrial ENG/wireless microphone use will require careful consideration and detailed compatibility studies to ensure protection of these services.

At this juncture, GPSIA is content to emphasize the preliminary and wholly-unagreed status of Doc. WAC/085, as presented for information to the WAC on March 11. There is much refinement and work to be done within the United States preparatory machinery for WRC-19 before a proposal to study possible new spectrum (in a range that excludes the RNSS and other sensitive bands) for potential WRC-23 action will be ready to leave the United States. GPSIA is prepared to work within the appropriate fora to address the continuing concerns and achieve consensus on the language of a proposed future agenda item.

For the reasons provided herein, GPSIA cannot support any advancement of Doc. WAC/085 in its current form as a proposed future agenda item for WRC-23. GPSIA respectfully urges the Commission to submit the document, as appropriate, into the next phase of the U.S. preparatory effort for WRC-19 for further consideration and deliberation.

Respectfully submitted,

GPS INNOVATION ALLIANCE

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1. *See International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 19-172 (rel. Mar. 11, 2019) (“*PN*”). [↑](#footnote-ref-1)
2. PN, Attachment B, at pp. 9-15 (“Doc. WAC/085”). [↑](#footnote-ref-2)
3. PN, at Attachment B. [↑](#footnote-ref-3)
4. *Id.*, at 13. [↑](#footnote-ref-4)