

May 10, 2018

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WRC-19 Recommendations
IB Docket No. 16-185**

Dear Ms. Dortch:

Motorola Solutions, Inc. (“MSI”) submits these comments in response to the Public Notice soliciting comments on recommendations approved by the Commission’s World Radiocommunications Conference (“WRC”) Advisory Committee (“WAC”).¹ These comments are limited to a singular draft proposal submitted by the National Telecommunications and Information Administration (“NTIA”) with respect to WRC-19 agenda item 1.3.² As further described below, MSI recommends that the U.S. position be modified from the NTIA’s recommendation to ensure protection to incumbent primary services.

Agenda Item 1.3 considers possible upgrading of the secondary allocation of the meteorological-satellite service (space-to-Earth) to primary status and adding a possible primary allocation to the Earth exploration-satellite service (space-to-Earth) in the frequency band 460 – 470 MHz. According to NTIA’s draft recommendation for the U.S. policy position on this matter, studies have demonstrated that sharing is possible between meteorological-satellite (space-to-Earth)/earth-exploration-satellite (space-to-Earth) services and the incumbent services.³ NTIA therefore recommends that the U.S. support the necessary modifications in the international regulations to elevate the allocation for the meteorological-satellite service in the 460 – 470 MHz band to primary and to add a new primary allocation for earth-exploration-satellite in the same band.

¹ *International Bureau Seeks Comment on Recommendations Approved By World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185 (Apr. 26, 2018).

² *Comment of Informal Working Group Three (IWG-3/046 NTIA/AA Coord. Letter on Agenda Items 1.1, 1.3, 1.7, 1.10, 1.15, and 7)*, IB Docket No. 16-185 (filed Apr. 16, 2018), at 4-5 (NTIA/AA Coord. Letter).

³ *Id.*



Internationally, the 460 – 470 MHz frequency band is allocated on a primary basis to the fixed and mobile services. In the U.S., the band comprises a significant portion of the dominant allocation for fixed and mobile services and is used intensely by public safety, critical infrastructure, industrial and commercial entities. Nearly 130,000 active licenses are currently reflected in the FCC’s Universal Licensing System (ULS) database. In addition, another 1,000 Federal assignments are also located in the band with “most used for land mobile systems for public safety interoperable communications between Federal, State and local public safety entities.”⁴ The NTIA’s Spectrum Use Report on the band concludes that “[with] the need for better coordination efforts between all levels of government, increased emphasis on homeland and border security protection, and a more effective and efficient response and recovery, Federal agencies will continue to operate, for the foreseeable future, land mobile communication systems in this band that are used in coordination and cooperation with State and local partners.”⁵

The meteorological-satellite service currently has a secondary allocation in the 460-470 MHz band. As a secondary allocation, the meteorological-satellite service shall not cause harmful interference to stations operating in accordance with the Table of Allocations. Existing international footnote 5.289 makes this condition explicit for earth exploration-satellite service applications that may be approved in the 460-470 MHz band.

By elevating the meteorological-satellite service to primary, the incumbent fixed and mobile services lose the overarching protection that satellite services shall not cause harmful interference to stations operating in accordance with the Table of Allocations. In part, the NTIA proposes to remedy this loss of protection by adding new footnote 5.A103 to make clear that “[t]he incumbent fixed and mobile allocations maintain a higher regulatory status over the primary meteorological-satellite (space-to-Earth) and earth exploration-satellite (space-to-Earth) services.”⁶ That footnote would state:

NTIA Proposed 5.A103 In the frequency band 460-470 MHz, earth stations in the meteorological-satellite (space-to-Earth) and earth-exploration-satellite (space-to-Earth) services shall not claim protection from, stations of the fixed and mobile services.

⁴ Federal Government Spectrum Use Reports 225 MHz – 7.125 GHz, 460-470 MHz, available at https://www.ntia.doc.gov/files/ntia/publications/compendium/0460.00-0470.00_01DEC15.pdf.

⁵ *Id.*

⁶ NTIA/AA Coord. Letter at 6.



MSI believes that it is essential to retain the band's current hierarchy and preserve the condition that satellite services shall not cause harmful interference to primary fixed and mobile services operating in accordance with the Table. Accordingly, MSI recommends that NTIA's draft policy statement be revised to read as follows [new text double underlined]:

ADD USA/AI 1.3/4

5.A103 In the frequency band 460-470 MHz, earth stations in the meteorological-satellite (space-to-Earth) and earth-exploration-satellite (space-to-Earth) services shall not cause harmful interference to stations of the fixed and mobile services and shall not claim protection from, stations of the fixed and mobile services.

Reasons: The incumbent fixed and mobile allocations maintain a higher regulatory status over the primary meteorological-satellite (space-to-Earth) and earth exploration-satellite (space-to-Earth) services by not being required to protect the metrological-satellite and earth-exploration satellite services. These Services shall not cause harmful interference to stations of the fixed and mobile services.

The NTIA's recommended U.S. position already acknowledges that incumbent fixed and mobile allocations should maintain a higher regulatory status over what would become primary meteorological-satellite and earth exploration-satellite services. MSI's proposed modification simply makes that point more clear and is a necessary addition as the U.S. enters into discussions with other administrations prior to WRC-19.

The 460-470 MHz band is critical for public safety and commercial applications in the U.S. and around the world. Full protection for this vital spectrum asset must be maintained.

Respectfully Submitted,

/S/ Frank Korinek

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