

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Recommendations Approved by World)	IB Docket No. 16-185
Radiocommunication Conference Advisory)	
Committee)	

COMMENTS OF INMARSAT

Inmarsat, Inc. (“Inmarsat”) submits these comments in response to the Public Notice issued by the International Bureau on October 30, 2017 in above captioned proceeding (the “PN”).¹ The PN seeks comments on the draft recommendations provided by the World Radiocommunication Conference Advisory Committee (“WAC”), which are contained in Attachment A, and draft proposals provided by the National Telecommunication and Information Administration, which are contained in Attachment B. These issues will be considered by the 2019 World Radiocommunication Conference (“WRC-19”).

Introduction

Inmarsat comments are limited to proposals addressing WRC-19 Agenda Item 1.8 contained in Attachment A of the PN. As stated in the PN consensus was not reached on this agenda item, which is assigned to Informal Working Group 1, and therefore two proposals, reflected as View A and View B, are included in the PN along with narrative justifications for each view. WRC-19 Agenda Item 1.8 is to “consider possible regulatory actions to support

¹ See *International Bureau Seeks Comment on Recommendations Approved by World Radiocommunication Conference Advisory Committee*, Public Notice, IB Docket No. 16-185, DA 17-1059 (Oct. 30, 2017) (“PN”).

Global Maritime Distress Safety Systems (GMDSS) modernization and to support the introduction of additional satellite systems into the GMDSS, in accordance with Resolution 359 (Rev.WRC-15)”.

The proposals outlined in the two Views are not that different and contrary to the observations by the View A proponents View B does not overcomplicate the proposal but offers greater clarity compared to View A. Each proposed change to the RRs are compared in the following sections.

1.0 Addition of 5.GMDSS to Article 5 of the Radio Regulations

View A

5.GMDSS The band 1616-1626.5 MHz may also be used for the provision of distress, urgency, and safety communications of the Global Maritime Distress and Safety System (GMDSS). (See Table 15-2 of Appendix 15, No. 33.50 and No. 33.53 of Article 33).

View B

5.GMDSS The band 1 618.725-1626.5 MHz may also be used for the provision of distress, urgency, and safety communications of the Global Maritime Distress and Safety System (GMDSS). (See Table 15-2 of Appendix 15, No. 33.50 and No. 33.53 of Article 33).

The only difference with respect to a proposed new footnote to allow GMDSS is the specified frequency range. View B is quite clear that, since it is the Iridium system that may be approved by the IMO to provide GMDSS services, the band should be limited to the spectrum where Iridium is licensed to operate. Extending the bands to include frequencies where Iridium will not provide GMDSS is not appropriate and may raise uncertainty with respect to which bands this important service can be provided in.

2.0 Application of No. 4.10

View A

5.368 With respect to the radiodetermination-satellite service and the mobile-satellite services the provisions of No. 4.10 do not apply in the band 1 610-1626.5 MHz MHz, with the exception of the aeronautical radionavigation-satellite service and aeronautical mobile-satellite (route) service in the band 1610-1626.5 MHz, and the Global Maritime Distress and Safety System in the band 1616-1626.5 MHz.

View B

5.368 With respect to the radiodetermination-satellite service and the mobile-satellite services the provisions of No. 4.10 do not apply in the band 1610-1626.5 MHz MHz, with the exception of the aeronautical radionavigation-satellite service in that band, and with the exception of the Global Maritime Distress and Safety System in the band 1 618.725-1626.5 MHz to which No. 4.10 applies only with respect to the assignment to, and use of frequencies on, the satellite system operating in the relevant portion of the band 1 618.725-1626.5 MHz band and comprising such GMDSS system.

The most significant differences between View A and View B is with respect to modification to RR No. 5.368 that addresses the application of No. 4.10 under Agenda Item 1.8. Aside from the frequency range that is addressed in the above section, View B would make clear that No. 4.10 applies intra-system, i.e. with respect to the prioritization of different spectrum uses by the satellite system providing GMDSS and hence does not introduce any new requirements or constraints on other systems operating in the same or adjacent frequency bands. This approach is consistent with the stated understanding of View A proponents that that the interference relationship between Iridium and services and systems in adjacent bands will remain unchanged as well as the View A proposal for Appendix 15. It is imperative that the U.S. proposal accurately capture this element and Inmarsat is prepared to work with all parties to ensure that

this is the case. In that spirit Inmarsat provides the following alternative modification to RR No. 5.368 that may be acceptable to all parties:

5.368 With respect to the radiodetermination-satellite service and the mobile-satellite services the provisions of No. 4.10 do not apply in the band 1610-1626.5 MHz, with the exception of the aeronautical radionavigation-satellite service in that band, and with the exception of the Global Maritime Distress and Safety System in the band 1 618.725-1626.5 MHz to which No. 4.10 applies only with respect to possible interference to GMDSS communications from within the satellite system providing GMDSS.

Another significant concern with the View A modification to RR No. 5.368 is the overreach by View A proponents to address Aeronautical Mobile Satellite (Route) service (AMS(R)S) under Agenda Item 1.8. This agenda item is clearly limited to possible regulatory action regarding GMDSS modernization and makes absolutely no mention of AMS(R)S. Any proposals to address (AMS(R)S) under Agenda Item 1.8 are completely out of scope and the Commission should not seek to address the AMS(R)S under a U.S. proposal on agenda item 1.8.

3.0 Modification to Appendix 15 of the Radio Regulations

Appendix 15 of the RRs addresses frequencies for distress and safety communications for GMDSS. Both View A and View B proposals add an entry to Table 15-2 to recognize the identification of GMDSS per footnote 5.GMDSS. Again aside from the frequency range that is addressed in Section 1 above the difference between the proposals are in the Notes column that is intended to provide information on the use of the spectrum by GMDSS.

View A

In addition to its availability for routine non-safety purposes, the band 1 616-1 626.5 MHz is used for distress and safety purposes in the Earth-to-space and space-to-Earth directions

in the maritime mobile-satellite service. GMDSS distress, urgency and safety communications have priority over non-safety communications within a satellite system (see No. 5.GMDSS).

View B

In addition to its availability for routine non-safety purposes, the band 1618.725-1626.5 MHz is used for distress and safety purposes in the Earth-to-space and space-to-Earth directions in the maritime mobile-satellite service. GMDSS distress, urgency and safety communications have priority over non-safety communications within the satellite system providing such GMDSS communications (see No. 5.GMDSS).

Both Views address priority of GMDSS traffic over non-safety communications, however the View B proposal provides further clarity that the priority between safety and non-safety is limited to within the satellite system that is providing the safety GMDSS communications, where the View A proposal can be interpreted to applying to other satellite systems.

Conclusion

The View A proponents tout their proposal as minimalist and superior to the View B proposal when in fact it is ambiguous and over reaching. Inmarsat urges the Commission to adopt the View B proposal for the reasons provided herein.