permit the Radio Regulations to be revised as necessary at WRC '97 with respect to pressing issues concerning MSS frequency allocations, including allocations for feeder links. However, Section 3.1 of the WRC '97 preliminary agenda should be modified to specify MSS service links as well as feeder links. Thus Section 3.1 should be modified to read: "unresolved and other pressing issues concerning frequency allocations and regulatory aspects as related to the mobile-satellite services, including allocations for service links and feeder links for mobile satellite services as appropriate."

In addition, Iridium would like to see the issue of frequency allocations and regulatory provisions relating to non-GSO fixed satellite services added to the agenda for WRC-97, but opposes having it considered at WRC '95.

Considering this issue at WRC-95 would be inappropriate and counter to U.S. interests for three reasons. First, as the Commission recognizes in footnote 13 of the NOI, "feeder link issues here are germane only to MSS Between 1 and 3 GHz." It is clear from the agenda for WRC-95 that the intent of item 2.1(c) on feeder links relates back to item 2.1(a) concerning MSS allocations below 3 GHz.

Consideration of issues pertaining to non-GSO FSS systems was never contemplated in establishing the agenda for WRC-95. Second, the necessary sharing studies have not been fully vetted nationally or in ITU Study Group 4. Finally, consideration of non-GSO FSS issues at WRC-95 would undermine more than two years of work that TG 4/5 has done on non-GSO feeder link issues and, more importantly, would jeopardize the ability of recently licensed non-GSO MSS systems to secure adequate feeder link spectrum and initiate service to the public in a timely manner. Thus, non-GSO FSS issues should instead be placed on the agenda for WRC-97, by which time they should be ripe for consideration.

CONCLUSION

WRC '95 presents an opportunity both to improve the current MSS allocations and associated regulatory procedures in order to facilitate their use by MSS operators, and to create new MSS allocations to meet anticipated demand in the near future. It also affords an opportunity to refine the agenda for WRC '97. In furtherance of these objectives, Iridium urges that the foregoing proposals be incorporated into the U.S. objectives for WRC '95 and WRC '97.

Respectfully submitted,
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Appendix 1: Proposal for Accommodating non-GSO MSS Feeder Links in Specific Bands above 17.7 GHz.

Attachment 1 IWG 4/39

Proposals for Ka Band Non-GSO MSS Feeder links

Consistent with the report of ITU-R TG-4/5 which has been endorsed by IWG-4, the following proposals are recommended for Ka band Non-GSO feeder links.

A. In the allocation 18.8-19.7 GHz add the following footnote:

ADD 872A

The frequencies in the band 19.2-19.7 GHz are primarily for use by Non-GSO MSS feeder links in the space-to-Earth direction. RR 2613 does not apply. Coordination of these frequencies will be carried out in accordance with the provisions of Resolution 46. Future GSO/FSS networks will not cause harmful interference to, or receive protection from Non-GSO MSS feeder link networks in this band.

Reason:

The language in this footnote was agreed to by ITU-R Task Group 4/5 as the basis for ensuring the availability of the frequencies in this band for Non-GSO MSS feeder links.

B. In the allocation 28.5-29.5 GHz add the following footnote:

ADD 882H

The frequencies in the band 29.0-29.5 GHz are primarily for use by Non-GSO MSS feeder links in the Earth-to-space direction. RR 2613 does not apply. Coordination of these frequencies will be carried out in accordance with the provisions of Resolution 46. Future GSO/FSS networks will not cause harmful interference to, or receive protection from Non-GSO MSS feeder link networks in this band.

Reason:

Same as 872A above.

Proposal for Article 27 Site Selection/Power Limit in bands shared with Non-GSO MSS feeder links and related services

Consistent with sharing studies currently in process in ITU-R WP-4/9S, the following proposals are recommended for terrestrial radiocommunication services sharing frequency bands with Non-GSO MSS feeder links and related space radiocommunication services in specific frequency bands.

ADD 2504B

As far as practicable, sites for transmitting stations, in the fixed or mobile service radiating at elevation angles of 2° or greater shall restrict their equivalent isotropic radiated power (e.i.r.p.) density to no more 24 dBW/MHz in clear air in the frequency bands 22.55-23.55 and 29.0-29.5 GHz. Operation at higher e.i.r.p. densities is permitted to the extent that the fixed or mobile service links are impaired by atmospheric conditions[1]

Reason:

The current Radio Regulations for the bands 22.55 to 23.55 GHz do not protect NGSO MSS feeder links (NGSO-MSS-FL) or inter-satellite links (NGSO-MSS-ISL) from possible interference from fixed (FS) and mobile stations (MS). These links carry satellite constellation trunking traffic over digital links. The NGSO-MSS-FL and NGSO-MSS-ISL links could be disrupted by the FS or MS stations pointing above the horizon at the e.i.r.p. limit of 55 dBW without an e.i.r.p. spectral density limit.

[1] This provision shall apply until such time as a recommendation on the e.i.r.p. density limit can be verified by further statistical studies on the interference relationships.