6.4. Views on Preliminary Agenda for WRC-2001

6.4.1 Identify carry-over proposals from WRC-99

6.4.2 New proposals

6.4.2.1 None identified

6.5. Proposed Preparatory Process for Future World Radiocommunication Conferences

Issue: What steps should the Commission take to improve and expedite its WRC preparatory activities and better coordinate with NTIA and the State Department?

Recommendation:

- The Commission should create an on-going (renewable) industry advisory committee within three months after each WRC to commence preparation for the next WRC, which committee to the extent permitted by FACA, will be quasi-permanent in practical effect.

- The new Radiocommunication Policy Branch should be responsible for administering the IAC process, keeping the committee in compliance with FACA provisions and assisting in the coordination process with NTIA and the State Department.

- The Commission NOI process for the next WRC should be initiated within three months after the last WRC, and should be closely related to the IAC process.

- The Commission is encouraged to support a more open IRAC process and increase early coordination by IRAC with the private sector.

- The Commission is encouraged to support the establishment of an informal (or formal) "steering" committee among RCS, FCC, State and IAC members to assure timely coordination.

- The Commission is encouraged to develop, in cooperation with the NTIA and the State Department, an agreed upon timeline for the institution and completion of essential conference preparatory activities. (See proposed schedule below).

- The preparatory process should be completed (or in nearly final draft form) in time for the second CPM meetings and CITEL coordination meetings.

Background: The 1992 ITU Constitution and Convention provide that a World Radiocommunication Conference shall be held every two years to consider substantive agenda matters and make recommendations for future conference agendas two and four years in advance. Experience since 1992 has demonstrated that a biennial conference schedule requires continuous and ongoing conference preparatory activities. The need for a well-defined and efficient process is particularly critical in the United States in light of the government's tri-partite decision making structure. The Commission's spectrum allocations and other proposals for WRCs must be coordinated with NTIA, and vice versa. Overall proposals to be submitted to the ITU and negotiated internationally are coordinated with the State Department. Hence an established and continuous coordination process during the preparatory period is essential.

Under provisions of the ITU Convention (No. 316), proposals from Members must be submitted at least four months prior to the start of the Conference, which normally means by June of the year of the Conference. The agenda for that conference will have been tentatively established some nineteen months prior to the date for submission of Member proposals (at the last WRC). Accordingly, the preparatory activities must be initiated and completed during that nineteen month period.

As a practical matter, the preparatory activities should be completed (or very far along) considerably ahead of the final submittal date of proposals, preferably by March-April of the year of the Conference. This will provide time to finalize an appropriate technical basis for the proposals (at the second meeting of the CPM) and to coordinate on a bilateral or multilateral basis with other countries and regions (as for example, CITEL in the Americas).

Agreeing upon final U.S. private industry positions (or substantially narrowing the differences) in the IAC is a difficult Commission-administered process. Also it is necessary to coordinate the Commission's proposals for the commercial use of the spectrum with the NTIA's proposals for government use of the spectrum. Responsible efforts to realistically determine spectrum requirements for new services and sophisticated studies to determine sharing feasibility take time. They also require good faith cooperation. An on-going coordination effort involving public/private sectors with government agencies will help the U.S. meet its tight preparatory process schedule.

Moreover, as later discussed, the ITU's biennial conference process, itself, has changed dramatically. No longer is each WRC a self-contained special purpose conference. Rather each conference is part of a continuum of events with past, present and future issues on each agenda. The emphasis will be on continuous preparation.

Specific Recommendations and Support Therefore

1. The FCC and the IAC Process

The major recommendation is the creation of an on-going industry advisory committee, renewable every two years, which to the extent permitted by the Federal Advisory Committee Act,[6] will be quasi-permanent in practical effect.

Section 14 of the Act provides that each advisory committee shall terminate "not later than" two years after the date of its establishment. Accordingly, the charter for a particular committee must be renewed or a separate IAC must be established for each WRC, in which case the charter and the terms of reference could contain common elements. In either case, it would be expected that some members would continue to serve on the committee. A renewal of the charter would appear to be the most appropriate option. The timing for the establishment of these on-going committees is discussed infra.

The crucial nature of the committee's work and its benefits to the Commission on matters of major international telecommunications policy clearly bring the establishment of this on-going committee within the intent of Executive Order No. 12838[7] issued by President Clinton on February 10, 1993. This Order permits the establishment of new advisory committees only where compelling consideration of national interests justify their creation. The IAC believes the preparatory work by these on-going industry committees is critical to the success of the U.S. at the biennial WRCs. Moreover, the importance of the IAC to the U.S. will become greater as the preparatory process is improved and as more effective coordination results among all the stakeholders, including private sector and government agency users.

The compelling need for an on-going committee results from the changing nature of the ITU's biennial radio conference process. The WRC's are no longer special purpose, randomly scheduled conferences. Each regularly scheduled conference will consider agenda matters not completed at the prior conference and new agenda matters proposed at the prior conference. It also will develop agenda proposals for conferences two and four years ahead. It also must give direction to the Radiocommunication Bureau and the Study Groups as to their responsibilities in conference preparations. The U.S. preparatory process must deal with each of these aspects as part of a continuum of ITU activities leading to new allocations, new services and amendments to the Radio Regulations.

---

[6]"FACA," Pub.L.92-463, 86 Stat. 770, 5 U.S.C.A. App. 2 (1994).

[7]Executive Order No. 12838, February 10, 1993, 58 F.R. 8207, reprinted in 5 U.S.C. A. Appendix 2, p. 214 (1994).

Several related recommendations further refine this proposal:

1. A new chairman of the renewed IAC should be appointed within three (3) months after the conclusion of each WRC to be responsible for the development of IAC recommendations for the next scheduled WRC. Alternatively, a Vice Chairman could also be appointed at the conclusion of a WRC, with the understanding that such person would move up to the Chairmanship for the IAC scheduled for two years later.

2. The IAC applauds the Commission for creating within its International Bureau, the Radiocommunication Policy Branch "with continuous conference planning responsibilities." (Par. 105, Second Notice of Inquiry, I C Docket No. 94-31) Creating the on-going advisory committee in timely fashion and complying with the FACA will be an important task. Also, as later discussed, this office should play a key role in implementing the inter-agency coordination process among FCC, NTIA and the State Department.

3. An initial NOI for a given WRC should be released within three months after a WRC, or about nineteen months prior to the next WRC. This NOI should be sufficiently broad to cover all of the subjects tentatively on the WRC agenda and should provide a short time period for response. Later, during the cycle more specific NOIs and/or NPRMs could be issued as appropriate. The work of the IAC should be closely related in timing and progress to the NOI process.

2. <u>Coordination Process Between the FCC and NTIA</u>

The IRAC process within the NTIA is responsible for determining the Government agency users requirements for new spectrum, new services and the Government requirements for continued use of existing spectrum. While this process has become more open in recent years, historically it has not been open to the private sector and even today, involves very little input from the private sector. In reality, the private sector has a vital interest in the IRAC output, not only because its hardware and software suppliers and operators supply products and services to the Government users, but also because the spectrum must be allocated between commercial and government use and the private sector frequently shares spectrum with the Government. While the FCC traditionally is responsible for the development of private sector and commercial requirements, both government and private

sector needs are closely intertwined. Close coordination is essential. The private sector should be involved in the total process.

In recent years, the IRAC process has become much more open. Most recently the NTIA has established a "Radio Conference Subcommittee" ("RCS") to coordinate the views of the various federal agencies on future WRC agenda matters; that committee is increasing its level of cooperation with the private sector, but much more must be done if the private sector is to become an effective part of the IRAC process.

More should be done to formalize this open process and increase at the earliest possible stage the involvement of private sector participants, including, if necessary, changes in the legislation creating the IRAC. The FCC is urged to encourage this open process. The IAC members would benefit from a timely exchange of information regarding the needs of the Executive Branch for existing as well as new radio spectrum and for information regarding new proposed government services. The converse is also true. Representatives from the RCS should actively participate in the IAC and act as liaison between the two groups. Through an early and mutual exchange of information at the working group levels, a more accurate assessment can be made as to requirements and a greater consensus can be reached.

Additionally, whether formally or informally, representatives of the RCS, the FCC's Radiocommunication Policy Branch, the State Department and the IAC should act from time to time as a "steering committee" to assure that the necessary coordination is being undertaken in a timely manner.

This proposal in no way negates the legal responsibility of the FCC and NTIA, respectively, to discharge their statutory obligations. Issues which cannot be resolved by consensus within the coordination process will still need to be negotiated and resolved within the government's decisional processes. The final decisions may be reached after the public process and IAC process has been concluded. How to keep the private sector involved in these negotiated decisions is an important question.

3. Coordination Between the State Department and the FCC/NTIA

The State Department plays an important role in WRC preparation conference activities, and is responsible for U.S. delegations and international negotiations. It has recently created an International Telecommunications Advisory Committee (ITAC) which replaces the previously existing CCITT and CCIR National Committees. Under the new structure three sector committees have been formed, which track the three sectors of the ITU, one of which is the National Radiocommunication Committee (ITAC-R)(the successor to the CCIR National Committee).

ITAC-R is charged with the responsibility nationally to provide the technical support and technical initiatives essential to the success at the WRCs. There is no reason to believe

that this responsibility will change. Indeed, because of the increased role of the "Conference Preparatory Meetings" (CPM) in Conference matters, the ITAC-R will have additional responsibilities, as it helps prepare the U.S. technical inputs to the CPM. Most of the members (government and private sector) of ITAC-R are actively involved in the conference preparatory work at FCC, NTIA and within the study groups and CPM's of the ITU-R. Hence, the technical experts of the ITAC-R will be totally familiar with and involved in the WRC agenda matters. This ongoing work should continue and should improve as the FCC and NTIA coordination processes become more efficient and timely. The FCC should continue to support this work with personnel and resources.

The ITAC itself, the parent umbrella organization, should also be involved in WRC preparatory activities, but only on a general policy or planning level. Specifically, the ITAC would be an appropriate forum to monitor and observe the WRC preparatory process, making such recommendations for improvement as are necessary and appropriate. It could deal with general policy, operational and structural matters affecting the ITU processes and U.S. participation in those activities. The FCC should support these ITAC activities. The State Department, of course, will remain responsible for the formation and conduct of U.S. delegations and for international negotiations. Also, to the extent there are specific WRC policy issues which must be resolved through inter-agency coordination, the State Department should continue to be a full participant.

4. The Importance of the Timeline

One major concern to the private sector is the need for timely ongoing preparatory activities. As earlier mentioned, final Member proposals should be submitted to the ITU four months in advance of the Conference. However, if U.S. positions are to be developed as effectively as possible and then promoted to other Member countries, the preparatory work must commence at the first meeting of the CPM, a few months after the Agenda setting conference, and be nearly completed at least several months in advance of the proposal submission date, or at least six months prior to the Conference.

The ITU conference preparatory process typically will start with the first meeting of the CPM, a few months after the WRC has tentatively established the agenda. The CPM establishes the work program for the study groups and the outline of the proposed CPM report. Some thirteen months later (in March) the second CPM is held to consider the work of the study groups and to develop the technical basis for the agenda items. U.S. technical input to the second CPM (through the ITAC-R) must be complete prior to the March CPM meeting. Using the CPM date as the control date, U.S. proposals for new allocations or modification to existing allocation constraints must be in reasonably complete draft form at that time, or some six months prior to the WRC.

Reinforcing this need for early action is the recent establishment in CITEL of a WRC Conference Preparatory Working Group, designed to afford early exchange of views regarding the agenda matters. This group also, over time, will try to coordinate common

proposals. Clearly this group could provide a forum for the consideration of specific U.S. proposals and those of other countries within the Americas Region. This CITEL group will likely hold its key meeting in the Spring of the year of the Conference. CITEL Members should be in a position to present and consider each others' proposals at that time.

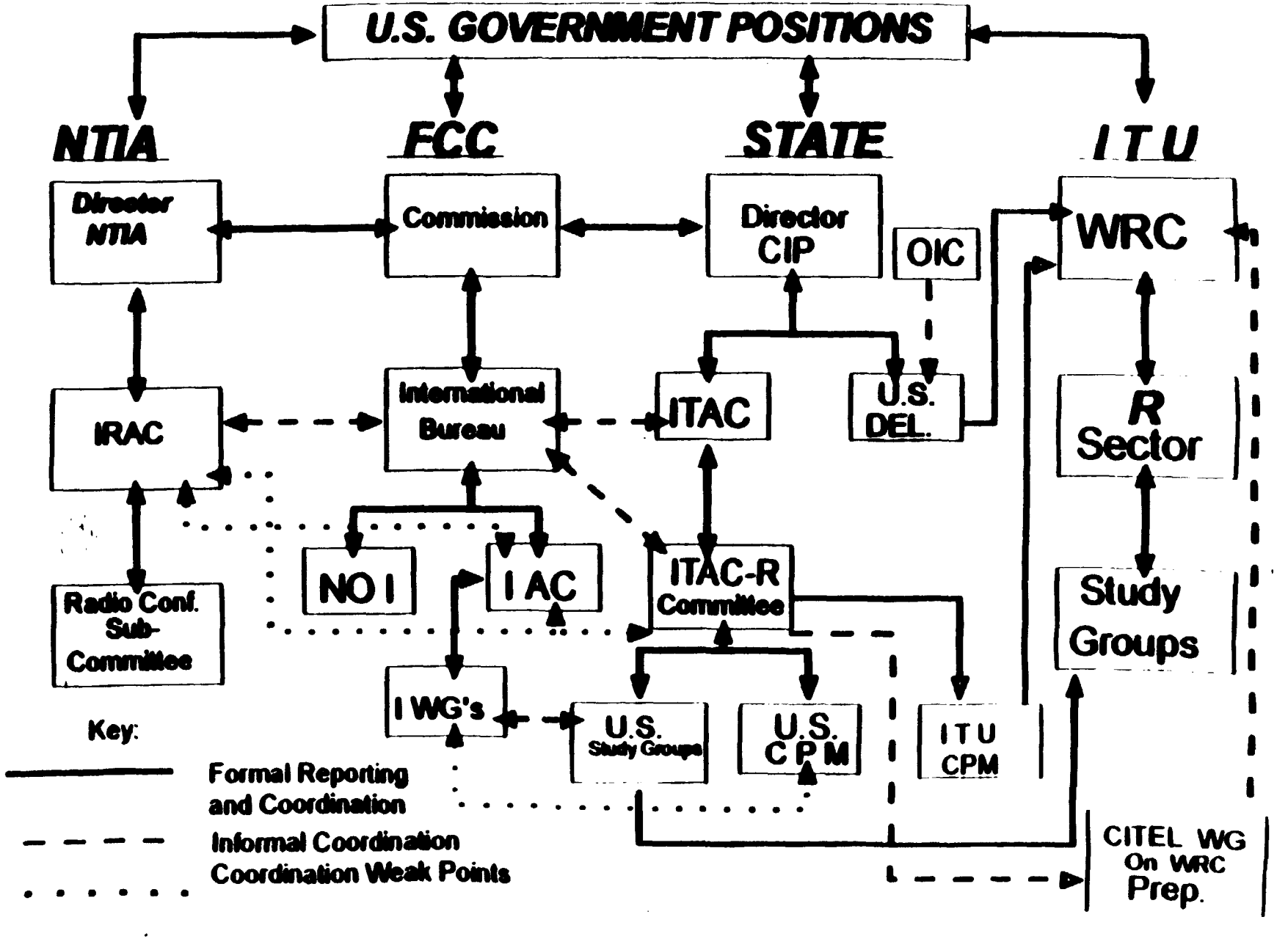
Finally, the U.S. will benefit from the early development of U.S. proposals through the opportunity to discuss such proposals in multi-lateral or bi-lateral forums well in advance of the Conference. Results of these consultations could cause a needed revision of some proposals. In any event other countries would better understand the U.S. proposals.

In summary, a schedule of U.S. preparatory activities might include the following timeline:

1.	Completion of WRC and adoption of Agenda for next conference	November, year 0
2.	First CPM	February, year 1
3.	Creation of next IAC	January - February, year 1
4.	Commission's First NOI	February, year 1
5.	Commission's Second NOI (as necessary)	September - October, year 1
6.	U.S. preparatory work for Second CPM (ITAC-R)	January - February, year 2
7.	Final IAC Report	March, year 2
8.	Proposed First FCC Report	March, year 2
9.	Second CPM	March - April, year 2
10.	Final FCC Report	May, year 2
11.	Supplemental FCC Reports (as necessary) and submission of U.S. proposals to ITU	June, year 2
12.	WRC	October - November, year 2

U.S. Preparatory Process for WRC's

Table of Organization



IWG-6 MEMBERS

Name	Affiliation	Fax No.	Phone No.
Audrey Allison	FCC	202-887-6121	202-739-0557
Barbara Baffer	Ericsson	804-948-6387	804-528-7037
John H. Bailey	ARINC	301-858-4049	301-858-4059
W.J. Blackburn	Ericsson Inc.-GE	804-528-7015	804-528-7391
James Byrd	Orbital Sciences Corp.	703-406-3505	703-406-5409
James R. Carroll	SFA	301-925-8612	301-925-9400
Fred Cwik	ITS America	202-484-3483	202-484-4137
Richard Denning	Dow, Lohnes & Albertson	202-857-2900	202-857-2638
Christine M. DiLapi	Motorola	602-732-2305	602-732-4169
Ben C. Fisher	Fisher, Wayland	202-296-6518	202-775-3537
Carl Frank	Wiley, Rein/Motorola/TIA	202-429-7207	202-429-7269
Loretta Garcia (Vice-Chairperson)	MCI	202-887-3175	202-887-2082
Bob Huang	Comsat World Systems	703-866-6045	703-866-0375
Kris Hutchison	Aeronautical Radio	410-266-2047	410-266-4386
Don Jansky	JBTI	202-296-6892	202-467-6400
Thomas J. Keller	Verner, Liipfert	202-371-6279	202-371-6060
Bob Kelly	Kelly & Povich	202-342-0458	202-342-0464
Leonard Kennedy (Chairperson)	Dow, Lohnes & Albertson	202-857-2900	202-857-2505
Damon C. Ladson	FCC	202-887-6121	202-739-0510
Mike Lewis	Wiley, Rein and Fielding	202-429-7049	202-429-7338
Jennifer A. Manner	Akin, Gump for Teledesic	202-887-4288	202-887-4576
Bob May	DoD	202-696-0798	202-696-0662
Edward F. Miller	Teledesic	216-234-3712	216-234-3712 (Same)
Kaye Nilson	Compass Rose	202-466-3055	202-833-2390
Stuart Overby	Motorola and TIA	202-842-3578	202-371-6940
Walter A. Pappas	Consultant CG	703-241-8863	703-241-8863
Wildu du Plessis	Akin Gump	202-887-4288	202-887-4281
Douglas Povich	Kelly & Povich	202-342-0458	202-342-0460
L.R. Raish	Fletcher, Heald & Hildreth	703-812-0486	703-812-0480
Jay Ramasastry	Qualcomm/LQP	202-833-2161	202-223-1720
Gene Rappoport	AT&T	908-234-8681	908-234-6230
Ron Repasi	FCC	202-634-6625	
Paul L. Rinaldo	ARRL	202-293-1319	202-296-9107
Eric Schimmel	TIA	703-907-7727	703-907-7707
Valerie Shuman	SEI Technology Group	708-699-6553	708-699-6500
Beverly Sincavage	Leslie Taylor Assoc./Loral	301-229-3148	301-229-9341
Thomas M. Sullivan	Computer Sciences Corp.	301-731-2238	301-731-2280
Leslie Taylor	LTA for LQP	301-229-3148	301-229-9341
Thomas Walsh	FCC	202-887-0175	202-418-0420
Alix Watson	AirTouch Communications	510-274-4811	510-210-3439
Jack Wengryniuk	Comsat	301-428-9287	301-428-5027
Gerald Wiggen	SFA, Inc.	301-925-8612	301-925-9400
Marcus Wolf	FCC	202-887-6121	202-739-0441

OTHER IWG MEMBERS

IWG-1	Chair	Raul R. Rodriguez	202-293-7783
	Vice Chair	Thomas J. Keller	202-371-6279
IWG-2	Chair	Donald M. Jansky	202-296-6892
	Vice Chair	Kathryn A. Martin	202-647-7407
IWG-3	Chair	Warren G. Richards	202-647-7407
	Vice Chair	Ben C. Fisher	202-296-6518
IWG-4	Chair	Jack Wengryniuk	301-428-9287
	Vice Chair	Michael L. Richmond	202-482-4396
IWG-5	Chair	Diane Garfield	202-647-0158
	Vice Chair	Jack Miller	301-262-2642

FCC INDUSTRY ADVISORY COMMITTEE

FOR THE

ITU 1995 WORLD RADIO COMMUNICATION CONFERENCE

FINAL REPORT

~~~~

ADDENDUM

~~~~

Submitted by:

Teledesic Corporation

1. Introduction

At the final meeting of Informal Working Group 4 (IWG-4) of the WRC-95 Industry Advisory Committee consideration of issues was limited to those systems intending to operate in the 1-3 GHz range. That necessitates this addendum to the IAC report to address feeder links for MSS networks with service links outside the range 1-3 GHz.

Within the terms of reference of IWG-4 and within the scope of the WRC-95 agenda there is a need to identify the bandwidth requirements, the frequency bands, the sharing possibilities, and the regulatory and procedural provisions for MSS feeder links while taking account of other uses of the bands that might be designated for MSS feeder links for proposed/potential U.S. GSO and non-GSO MSS systems. This addendum to the IWG-4 report addresses the Feeder Link Requirements for MSS Networks (Section 2), the Considerations Relating to the Choice of Frequency Bands (Section 3), Feasibility of Frequency Sharing Between MSS Feeder Links and Other Services (Section 4), Regulatory and Procedural Issues (Section 5), and finally, Specific Proposals for MSS Feeder Links (Section 6).

2. Feeder Link Requirements for MSS Networks Outside the Range 1-3 GHz

Information was provided to IWG-4 for a currently proposed, combined MSS and FSS network that would operate a system of 840 non-geostationary satellites in the Ka band frequencies (17.7-20.2 GHz and 27.5-30.0 GHz). This system has feeder link spectrum requirements as shown in the following table.

Feeder Link Requirements
for NON-GSO MSS Systems
Operating Service Links Above 17.7 GHz

Frequency Range	Spectrum (each direction)
17.7-30 GHz	400 MHz*

*The Teledesic system also performs feeder link operations within an additional 800 MHz of bandwidth in each direction, but this use could be shared with other FSS uses such as GSO FSS.

For feeder link spectrum above 16 GHz some MSS system proponents assume that dual polarization can not be used, while one proponent (Teledesic) incorporates dual polarization into its spectrum use plan.

The feasibility of multiple systems sharing the same feeder link spectrum continues to be evaluated. Geometric and computer analyses verify that in-line interference will occur when multiple systems use the same feeder link spectrum.

However, a variety of techniques, coordinated by the systems, may be available to reduce the frequency of occurrence and the duration of in-line interference events to acceptable values. The total non-GSO MSS feeder link bandwidth required at Ka band for all MSS systems depends upon the ability of systems to share the same feeder link spectrum and on the degree of polarization re-use of the spectrum. Analytic results for frequency sharing among non-GSO MSS systems are presented in section 4.

3. Considerations Relating to Choice of Frequency Bands for MSS Feeder Links at 20-30 GHz (Ka Band)

While the Ka band spectrum is relatively lightly used by operating systems, proposed FSS systems and the currently planned non-GSO FSS and MSS systems would occupy virtually all of the bands 17.7-20.2 GHz and 27.5-30.0 GHz, worldwide. Account must be taken of proposed uses of these bands by currently allocated existing services when considering these bands for non-GSO MSS feeder links. Additional complications in using these bands result from the small antennas and ubiquitous location of feeder link terminals for the proposed Ka band non-GSO MSS system. Similarly, small antenna sizes and the number of terminals planned by proposed FSS systems (both non-GSO and GSO) also make shared use of these bands more difficult.

4. Feasibility of Frequency Sharing

4.1 Co-Directional Frequency Sharing Between non-GSO MSS Feeder Links and GSO FSS Systems

As discussed previously, when non-GSO MSS feeder links and GSO FSS links share the same frequency band co-directionally, in-line coupling can occur. This in-line coupling can result in high levels of short term interference, and internationally, short-term interference criteria have been adopted for this case. Computer simulations of a Ka band non-GSO MSS system sharing spectrum with a GSO FSS system have statistically examined the frequency of occurrence and the periods of the resulting interference. These computer simulations of sharing between systems having large numbers of small antenna diameter earth stations have indicated that co-directional sharing at 20-30 GHz may be difficult. Hence, IWG-4 concluded that co-directional sharing may not be possible between all currently planned non-GSO MSS systems and planned GSO FSS systems. However, for certain high data rate terminals, which are fewer in number and have larger antenna diameters, co-directional frequency sharing is feasible.

4.2 Frequency Sharing Between non-GSO MSS Feeder Links and Fixed Service Networks

One non-GSO system, with combined FSS and MSS operation has the potential density of feeder link earth stations of approximately one per square mile, worldwide. While the number of earth stations is potentially quite high, the stations operate only above 40 degrees elevation angle, which would mitigate against interference to and from fixed service stations.

4.3 Frequency Sharing Between Multiple non-GSO MSS Feeder Link Networks

Studies of 20 and 30 GHz feeder link sharing between two Big LEO systems and a 840 satellite system with high data rate, standard, and mobile earth stations have shown that these systems can share frequencies with the high data rate earth stations. However, for the standard and the mobile terminals, without mitigating factors applied, sharing would be difficult. Thus, without frequency sharing between feeder links for Big LEO systems and the non-GSO MSS/FSS system with Ka band service links, the Ka band feeder link requirement to accommodate all planned/potential MSS systems, would be increased beyond that required for Big LEO systems alone. (A minimum of 1000 MHz Ka band allocation in each direction would be necessary to accommodate the three proposed non-GSO MSS feeder link uses, unless frequency sharing were determined to be practicable.)

5. Regulatory/Procedural Provisions for non-GSO MSS Feeder Link Networks

5.1 Introduction

There is general recognition that both the GSO satellite networks and non-GSO satellite networks must have a regulatory base which permits their orderly operation without unreasonable regulatory uncertainties to their full operational life. The regulatory structure governing satellite communications has evolved to fit the characteristics of geostationary satellites. That includes RR2613, which effectively treats GSO systems as primary and non-GSO systems as secondary with respect to co-frequency use. RR2613 places non-GSO satellite systems, including MSS feeder link networks, at a decided disadvantage by permitting GSO satellite networks to pre-empt non-GSO operation even after the non-GSO system has been deployed. Action is required at WRC-95 to remove this regulatory uncertainty with respect to currently proposed non-GSO systems, and to ensure equitable access to the orbit/spectrum resources by these non-GSO networks. The best way to achieve this objective is by a separate allocation of the Ka band spectrum on a primary basis for non-GSO satellite systems.

5.2 Possible Regulatory/Procedural Revisions to Article 8 in the Bands Above 17.7 GHz

Some of the allocations to the Fixed-Satellite Service could be qualified in a manner which would accommodate non-GSO FSS including MSS feeder link networks. These qualifications in the Table of Frequency Allocations could be used to provide frequency usage on an equitable basis for both non-GSO and GSO satellite networks.

In the FSS bands above 17.7 GHz, one regulatory approach that would guarantee future access by all FSS applications would be the following:

- RR2613 would be waived in those sub-bands identified for use primarily by non-GSO networks including MSS feeder link networks;

- accommodation of existing GSO networks would be provided such that they would continue to have equal status with respect to non-GSO networks in those specific sub-bands;

- within these specific sub-bands, future GSO networks would not cause harmful interference to, or receive protection from, non-GSO networks.

6. Proposals Regarding the Feeder Links for Mobile-Satellite Service Networks

To specifically accommodate the feeder links for the non-GSO MSS, and with due regard to existing services (both non-GSO networks and GSO networks) to which the frequency spectrum is also allocated, two proposals are offered. These proposals:

- Take account of <u>all</u> proposed/potential U.S. non-GSO MSS networks that plan to use Ka band for MSS feeder links.
- Give "due regard to existing services" by providing the regulatory opportunity for both non-GSO and GSO networks to be implemented in different parts of the band.

The proposals are:

A. In the frequency bands covering 18.8 - 19.8 GHz add the following footnote:

<u>ADD 872A</u>

<u>The frequencies in the band 18.8 - 19.8 GHz are primarily for use by non-GSO networks in the space-to-Earth direction. Such use is subject to the application of the coordination and notification procedures set forth in Resolution 46. The provisions of RR2613 do not apply. Stations of GSO fixed satellite service networks brought into use in the band 18.8 - 19.8 GHz after November xx, 1995 shall not claim protection from and shall not cause harmful interference to non-GSO networks in this band.</u>

B. In the frequency bands covering 28.6 - 29.6 GHz add the following footnote:

<u>ADD 882H</u>

<u>The frequencies in the band 28.6 - 29.6 GHz are primarily for use by non-GSO networks in the Earth-to-space direction. Such use is subject to the application of the coordination and notification procedures set forth in Resolution 46. The provisions of RR2613 do not apply. Stations of GSO fixed satellite service networks brought into use in the band 28.6 - 29.6 GHz after November xx, 1995 shall not claim protection from and shall not cause harmful interference to non-GSO networks in this band.</u>

000334