

**PROPOSED EDITS TO NTIA DRAFT PROPOSAL ON WRC-15 AI 1.1  
(REF. WAC/105(20.05.15))**

**With Respect to 1300-1400 MHz**

IWG-2 members were not able to reach consensus on a proposal for WRC-15 agenda item 1.1 regarding the 1 300-1 400 MHz frequency range and, therefore, forwards two views on how the FCC should handle this matter.

View A is supported by Aviation Spectrum Resources, Inc., EchoStar Corporation, Inmarsat, Intelsat, Lockheed Martin Corp., New Wave Spectrum Partners LLC, SES Americom, and The Boeing Company.

View B is supported by Alcatel-Lucent, AT&T, Ericsson, Intel Corporation, Motorola Mobility, Nokia Solutions and Networks, Samsung, Sprint Corporation, Telecommunications Management Group Inc. and Verizon.

# VIEW A

**VIEW A: SUPPORT FOR THE U.S. PROPOSAL FOR NO CHANGE UNDER AI 1.1,  
FOR THE FREQUENCY BAND 1300-1400 MHz IN ALL THREE ITU REGIONS**

The following WAC members are of the view that IWG-2 and the WAC should accept and endorse the current United States Proposal to WRC-15, under Agenda Item 1.1, for no change (NOC) in all three ITU Regions in the frequency band 1300-1400 MHz: Aviation Spectrum Resources, Inc., EchoStar Corporation, Inmarsat, Intelsat, Lockheed Martin Corp., New Wave Spectrum Partners LLC, SES Americom, and The Boeing Company.

Document WAC/105, from NTIA, contains a draft proposal for NOC for the 1300-1400 MHz frequency range. The United States took a slightly modified version of this proposal to the CITEL PCC.II meeting in Medellin, Colombia in February 2015. This NOC proposal is now a Preliminary Proposal in CITEL. Now, IWG-2 is considering whether to accept, reject, or propose comments to the proposal the U.S. has in CITEL.

There are two distinct segments in this frequency range – the 1300-1350 MHz band and the 1350-1400 MHz band. There appears to be consensus within IWG-2 that the three-Region NOC proposal for 1300-1350 MHz is acceptable, as this band segment is not identified in Section 1/1.1/4.2 of the CPM Report as a potential candidate frequency band. That makes the segment consistent in substance with the NTIA proposal in Document WAC/105.

For the 1350-1400 MHz band, the View A proponents agree with the NTIA proposal in WAC/105 for NOC across all three ITU Regions is the appropriate proposal. The View B proponents seek to limit the NOC proposal for 1350-1400 MHz to Region 2, despite not disputing that ITU-R compatibility studies all show that co-frequency sharing between radars and IMT systems in the same geographical area is not feasible in the 1300-1400 MHz range, and despite acknowledging that there is no technical basis for WRC-15 to assess compatibility between IMT and non-IMT mobile service in the 1350-1400 MHz band.

The only approach the FCC and the U.S. should consider for WRC-15 under these circumstances is to propose no change under Agenda Item 1.1 for WRC-15; these facts do not justify the View B approach of saying no change for our country and region, but leaving open the possibility that other countries and regions could ask WRC-15 to take actions not technically justified that inure to the extreme detriment of existing services. The View A proponents also do not support modifying the background section of the proposal to include references to future intra-U.S. Government studies. This proposal is for WRC-15, and not the future. Again, the View A proponents agree with NTIA and the WAC/105-based current U.S. proposal that for WRC-15, the only appropriate and justifiable proposal is for NOC across all three ITU Regions.

# VIEW B

**VIEW B: Revisions to WRC-15 AI 1.1  
Proposal Regarding 1 300- 1 400 MHz**

View B (attached) proposes revisions to the US proposal as submitted to the February 2015 meeting of CITEL PCC II for the 1 300 – 1 400 MHz frequency range under WRC-15 agenda item 1.1, in response to WAC/105 (20.05.15).

View B is supported by Alcatel-Lucent, AT&T, Ericsson, Intel Corporation, Motorola Mobility, Nokia Solutions and Networks, Samsung, Sprint Corporation, Telecommunications Management Group Inc. and Verizon.

Noting that the 1 300-1390 MHz frequency range is designated “for future study” in the NTIA Ten-year Plan and Timetable, the proponents of View B realize that the United States cannot support identification of spectrum within this frequency range to IMT due to existing operations in the United States. The attached proposal supports NOC in 1350-1400 MHz in Region 2, while not making a proposal regarding other Regions.

In addition, the proponents of View B have significant concerns about text regarding the role of the ITU-R in determining the “practicality” of mitigation techniques. Regarding another important issue, text regarding the possibility of harmonization has also been corrected based upon CPM text.

**ATTACHMENT TO VIEW B:  
Revisions to WRC-15 AI 1.1  
Proposal Regarding 1 300- 1 400 MHz**

**Draft**

**United States of America**

**PROPOSALS FOR THE WORK OF THE CONFERENCE**

**Agenda item 1.1**

1.1 to consider additional spectrum allocations to the mobile service on a primary basis and identification of additional frequency bands for International Mobile Telecommunications (IMT) and related regulatory provisions, to facilitate the development of terrestrial mobile broadband applications, in accordance with Resolution **233 (WRC-12)**;

**Background Information:** The 2012 World Radiocommunication Conference (WRC-12) recognized a need for additional radio spectrum to support the increasing mobile data traffic, and placed consideration of additional spectrum allocations for terrestrial mobile broadband applications on the agenda for WRC-15. The ITU established the Joint Task Group (JTG) 4-5-6-7 to consider spectrum requirements for IMT/mobile broadband and conduct compatibility studies taking into account protection requirements of other services from concerned ITU-R Working Parties.

JTG 4-5-6-7 ~~conducted~~carried out studies on the compatibility between IMT systems and the radars that operate in the 1 300-1 400 MHz range and all studies show that co-frequency sharing between radars and IMT systems in the same geographical area is not feasible. These studies are contained in a working document attached to the final JTG 4-5-6-7 Chairman's Report (Annex 25 document 4-5-6-7/715). Additionally, the studies show that global harmonization of this band for IMT use may not be feasible, ~~and that any use of portions of this frequency range for IMT is possible only at the national level. Moreover, the mitigation techniques in Annex 25 that might allow compatible operations at the national level "have not at this point been determined as practical by the expert working parties" of the ITU-R.~~

In Region 1 and the United States, the frequency range 1 350-1 400 MHz (1 350-1 390 MHz in the United States) has co-primary allocations to the fixed service (FS), mobile service (MS), and

radiolocation services. In addition, the 1350-1370 MHz frequency band has a co-primary allocation to the aeronautical radionavigation service in the United States and Canada via footnote 5.334). The JTG did not conduct sharing studies between IMT and other MS systems operating in the band. Therefore, no technical basis exists to assess the compatibility between these differing MS applications. ~~Given the importance of these MS operations in the United States, including critical aeronautical mobile telemetry (AMT) operations, and the lack of studies in the ITU-R on compatibility between the differing MS uses of the band, the United States cannot support identification for IMT use in the 1 300-1 400 MHz frequency range.~~

The 1 300-1390 MHz frequency range is designated “for future study” in the NTIA Ten-year Plan and Timetable and “...to assist in identifying additional frequency bands for potential repurposing, NTIA will work with federal agencies to complete quantitative assessments of actual spectrum use in five frequency bands”, which include 1 300- 1 390 MHz.<sup>1</sup>

Given the results of the ITU-R studies in the working document, the lack of studies in the ITU-R on compatibility between the differing MS uses of the band, and the importance of these MS operations in the United States, the United States cannot support IMT identification in the 1 300-1 350-1 400 MHz band in Region 2. The US makes no proposal regarding other Regions for the 1350-1400 MHz band. The 1 300-1 350 MHz band was not identified as a potential candidate band by JTG 4-5-6-7: the United States proposes NOC for all 3 Regions for the 1 300- 1 350 MHz band.

**Proposal:**

NOC                      USA/1.1/1

**ARTICLE 5**

**Frequency allocations**

Section IV – Table of Frequency Allocations  
(See No. 2.1)

**1 300-1 400 MHz**

Allocation to services		
Region 1	Region 2	Region 3
<b>1 300-1 350</b>	RADIOLOCATION AERONAUTICAL RADIONAVIGATION 5.337 RADIONAVIGATION-SATELLITE (Earth-to-space) 5.149 5.337A	

<sup>1</sup> [http://www.ntia.doc.gov/files/ntia/publications/ntia\\_5th\\_interim\\_progress\\_report\\_on\\_ten-year\\_timetable\\_april\\_2015.pdf](http://www.ntia.doc.gov/files/ntia/publications/ntia_5th_interim_progress_report_on_ten-year_timetable_april_2015.pdf)

<p><del>*****</del>  <del>1 350-1 400</del>  <del>FIXED</del>  <del>MOBILE</del>  <del>RADIOLOCATION</del>  <del>5.149 5.338 5.338A 5.339</del></p>	<p><b>1 350-1 400</b>  RADIOLOCATION 5.338A  5.149 5.334 5.339</p>	<p><del>*****</del></p>
---	--	-------------------------

**Reasons:** Preliminary ITU-R studies show that co-frequency sharing between IMT and incumbent radiolocation systems in the same geographical area is not feasible. The compatibility between IMT and other mobile service applications was not studied. 1 300- 1 350 MHz was not identified as a potential candidate band by JTG4-5-6-7: NOC is proposed for all 3 Regions. For the 1350-1400 MHz frequency band, NOC is proposed for Region 2: no proposal is made for the other Regions.