

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

THE FCC’S ADVISORY COMMITTEE)
FOR THE 2007 WORLD)
RADIOCOMMUNICATION) IB Docket 04-286
CONFERENCE CONSIDERS)
RECOMMENDATIONS ON WRC-07)
ISSUES)

COMMENTS OF MOTOROLA, INC.

Motorola, Inc. (“Motorola”) hereby respectfully submits these comments in response to the Public Notice seeking comments on draft proposals for the 2007 World Radiocommunication Conference (WRC-2007) developed by the Executive Branch Agencies and provided by the National Telecommunications and Information Administration.¹ Specifically Motorola provides comments with respect to two of the proposals considered in the Public Notice. Motorola believes that the proposal contained in WAC document 058 related to WRC-2007 agenda item 1.14 requires additional analysis. Motorola opposes the proposal in WAC document 057 to suppress agenda item 2.8 on the provisional WRC-10 agenda.

¹ Public Notice, *The FCC’s Advisory Committee For the 2007 World Radiocommunication Conference Considers Recommendations on WRC-07 Issues*, June 27, 1002, DA 05-1774 (“Public Notice”)

Document WAC/058(22.06.05) - Agenda Item 1.14

Background

The Public Notice includes a proposal (Agenda Item 1.14, at p. 16) to allocate the band 162.0125-162.0375 MHz, centered on 162.025 MHz (Channel 88B), for maritime mobile-satellite use. Although that band is presently allocated for terrestrial maritime use, the proposal seeks to extend that allocation to allow reception by low earth satellites that support the Automatic Identification System (AIS) used, among other things, to enhance navigation safety. Specifically, the proposal states, “In order to locate and identify vessels for security purposes beyond VHF range of shore, the U.S. plans to install AIS receivers on aircraft and on low earth orbit mobile satellite platforms.”²

To that end, a new paragraph has been proposed for insertion into Note 5.226 of Article 5— Frequency allocations — Section IV – Table of Frequency Allocations, as follows:

In the maritime mobile service the frequency 162.025 MHz shall be used exclusively for automatic identification systems (AIS) (see Appendix 18). The band 162.0125-162.0375 MHz is also allocated on a primary basis to the maritime mobile-satellite service (earth-to-space) for reception by satellites of emissions from AIS transmitting at 162.025 MHz.³

In addition, the subsequent paragraph already appearing in Note 5.226 would be modified to insert the underlined language shown below:

Any use of frequencies in these bands by stations of other services to

² Public Notice, at 16.

³ *Id.* at 17.

which they are allocated should be avoided in areas where such use might cause harmful interference to the maritime mobile and maritime mobile-satellite services.⁴

Discussion

Motorola respectfully asks the agency to ensure that the proposal does not negatively affect the availability and performance of channels deployed for non-maritime public safety and homeland security purposes on bands adjacent to Channel 88B. Although Motorola understands that non-maritime use of this band is secondary to maritime operations, such systems have operated successfully in the past under the limitations imposed by the current FCC rules without causing interference to maritime operations. This is due primarily because of the geographic separation that operators have been able to maintain between terrestrial maritime and non-maritime systems.

Motorola also believes that additional technical information is necessary to fully understand the proposal. Because the proposal does not include the specifications of the proposed AIS satellite operation, it is simply impossible to evaluate whether non-maritime use of adjacent VHF channels would cause interference to such operations. Interference protection of satellite operations may raise technical considerations that are different from terrestrial operations. It is noted that studies pertaining to AIS detection via satellite are just underway in the ITU-R, so it would be beneficial to await the results of these studies before concluding on a U.S. proposal pursuant to this agenda item. WP 8B of ITU-R SG 8 has the responsibility to develop a draft CPM report text element related to the technical aspects of this agenda item, and has not yet completed its work (See Abstract of Doc. US8B05-46.)

⁴ *Id.*

Accordingly, Motorola urges the agency to consider the effect the proposed changes would have on non-maritime use of adjacent, non-AIS channels in this band before it adopts or endorses any changes that could further limit such operations that currently support public safety and homeland security activities.

Document WAC/057(22.06.05) - Agenda Item 7.2

Background

The Public Notice contains a proposal to delete agenda item 2.8 in the provisional WRC-10 agenda given in Res. 803(WRC-2003).⁵ This agenda item calls for WRC-10 to:

consider the progress of the ITU-R studies concerning the development and regulatory requirements of terrestrial wireless interactive multimedia applications, in accordance with Recommendation 722 (WRC-03) and to take any appropriate action on this subject;

The draft proposal from NTIA proposes that this item be suppressed from the WRC-10 agenda because it does “. . .not address regulatory or allocation issues and is not considered mature enough for consideration for action by a WRC.”

Discussion

Motorola disagrees with the proposal to delete agenda item 2.8. It is far too early to determine whether the reason given for proposing deletion of the proposal is valid. While Motorola would agree with the proposal’s contention that consideration of this issue at WRC-03 was premature and resulted in a lack of resolution, it is not reasonable to extend this logic without further examination to a conference seven years later. Given current developments in the ITU-R and elsewhere, it is likely that these issues will have sufficiently matured by 2010 for consideration by a WRC.

⁵ Public Notice at 19.

As indicated in considering *b)* and noting *d)* of ITU-R Rec. 722, the companion recommendation to agenda item 2.8, convergence is starting to occur in multimedia wireless applications and the boundary between mobile, fixed, and broadcasting services as currently defined by the ITU-R are likely to both blur and blend in the future. The dramatic changes in technology and provision of services may well result in changes to the Radio Regulations. Indeed, there is currently a study underway in the ITU-R with respect to convergence of applications within the radio services. WP 1B of ITU-R SG1 is developing an ITU-R Report on technical convergence with respect to terrestrial fixed, mobile, and broadcasting interactive multimedia applications (see Annex 4 to Doc. 1B/16). A possible result of this effort may be the identification of regulatory and/or allocation issues pursuant to the convergence of these multimedia applications. WP 1B has also sent Liaison Statements to other ITU-R groups requesting their views on radiocommunication service definitions in light of evolving wireless applications, and has been receiving liaison replies. (See Docs. 1B/ 53, /59, /61, etc.). Accordingly, it is premature to adopt any proposal that concludes that this agenda item will not be mature for consideration at WRC-10, or that it does not warrant consideration at that conference.

Conclusion

Motorola urges that proposals for use of AIS channels by the maritime mobile satellite service not adversely impact use of these channels for non-maritime mobile services which provide critical capacity for land mobile systems in areas where they do not cause interference to the current primary maritime use of these channels. Motorola proposes that no final decision on this proposal be made until the mitigation measures necessary to allow sharing between

terrestrial systems and satellite systems is fully understood. In addition, Motorola opposes suppression of agenda item 2.8 on the preliminary WRC-10 agenda. Considering ongoing work in the ITU, it is premature to consider suppression of this agenda item at this time.

Respectfully submitted,

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