

**POSITION OF ARRL REGARDING NTIA PROPOSAL ON AGENDA ITEM 1.10**

ARRL objects to the NTIA proposal expressed on pages 2 and 3 of Document WAC/055. ARRL has no objection to the separate proposal regarding AIS on pages 4-7 of WAC/055.

ARRL's objections are as follows:

- 1) On September 1, 2009, the full WAC approved a proposal for Agenda Item 1.23 (Document WAC/053) that is fundamentally incompatible with NTIA's proposal for an exclusive allocation to the maritime mobile service at 495-505 kHz. The WAC cannot adopt the NTIA proposal without altering its proposal on Agenda Item 1.23.
- 2) ARRL contends that Agenda Item 1.10 is not an appropriate forum to consider MF applications. The supporting Resolution 357 fails to explicitly mention MF as a solution for ship and port safety matters. As for safety in ports, which are relatively small areas, the long range propagation characteristics of MF make this band unsuitable for addressing the Agenda Item. As for broader ship safety, the implementation of the Global Maritime Distress Safety System has rendered past safety uses of MF by the maritime mobile service obsolete and renders future uses superfluous.
- 3) The purported future needs of the maritime mobile service within the 415-526.5 kHz band have, at best, been poorly and vaguely defined. To date, the only attempt to characterize a future system known to ARRL is contained in a preliminary draft new report introduced at the November meeting of ITU-R Working Party 5B, carried forward as Annex 20 to Document 5B/417, titled, "Utilisation of the 500 kHz band for the digital broadcasting from shore-to-ships of information related to the safety and the security" [sic]. The PDNR has not been vetted and is far from a finished product.
- 4) Despite suggestions by NTIA to the contrary, a globally harmonized allocation to the maritime mobile service already exists at 495-505 kHz, and one would exist even if additional secondary services were introduced to the band. Harmonization is a function of a common worldwide allocation, not of the exclusivity of such an allocation.

When WRC-07 set the agenda for what was then WRC-11, it decided to make requirements for safety systems for ships and ports a separate Agenda Item from consideration of a secondary allocation to the amateur service within 415-526.5 kHz. Had WRC-07 intended for the two Agenda Items to be linked, it could have and would have approved an agenda in which the two issues were combined under one Agenda Item. The fact that two Agenda Items were listed indicates no such linkage, and that 415-526.5 kHz is not contemplated for the satisfaction of Agenda Item 1.10. ARRL declines to make a counterproposal for Agenda Item 1.10 at this time, as matters relating to 415-526.5 kHz are appropriately addressed within IWG-2 when considering Agenda Item 1.23.