



Radio Technical Commission for Maritime Services

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

In the Matter of)
)
Recommendations Approved by the Advisory) IB Docket No. 04-286
Committee for the 2012 World)
Radiocommunication Conference) DA 10-372
)
) March 5, 2010

**COMMENTS OF THE RADIO TECHNICAL COMMISSION FOR MARITIME
SERVICES (RTCM)**

The Radio Technical Commission for Maritime Services (RTCM) respectfully submits these Comments in response to the Public Notice published March 5, 2010.

RTCM supports the NTIA proposal on WRC Agenda item 1.10 as it appears in document WAC/055(02.03.10). We agree with the need for an exclusive primary allocation for the maritime services in the 415 – 526.5 kHz band for MMSI, security related broadcasts, and data communication systems.

However, we are aware that the WRC-12 Advisory Committee (WAC) has approved a recommendation on Agenda item 1.23 that is in conflict with WAC/055. The WAC approved document WAC/053 at its September 1, 2009 meeting. This paper proposes the addition of a secondary allocation for the Amateur service in the bands 495-505 kHz and 505-510 kHz.

We are concerned that the new maritime services cannot coexist with an Amateur allocation in this band, even on a secondary basis. Paper WAC/053 suggests a listen-before-transmit protocol for the secondary service, which might have been appropriate when the primary service was using manual Morse Code transmissions. However, modern automated digital communications at high bit rates may only require a fraction of a second to transmit. This cannot be detected by a listen-before-transmit protocol. In fact, use of this band by an Amateur secondary service might interfere with the digital transmissions, and prevent the reception of messages by users of the primary service. We urge that the addition of the secondary allocation in this band not be supported by the United States.

For the Radio Technical Commission for Maritime Services

A handwritten signature in black ink, appearing to read "R. L. Markle". The signature is written in a cursive, flowing style.

R. L. Markle
President