

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of:)	
)	
WRC-12 Advisory Committee)	IB Docket No. 04-286
)	
To: The Commission)	

COMMENTS OF SHIPCOM, LLC

Introduction

ShipCom, LLC. (ShipCom) owns and operates Public Coast Stations WLO, WCL, KNN and KLB. ShipCom stations provide public correspondence service on numerous frequencies in the High Frequency (HF) spectrum. ShipCom stations provide radio-telephone service, Narrow Band Direct Printing (NBDP) service as well as Internet email-over-radio service. ShipCom station WLO has been providing continuous service to the maritime community since 1948. Therefore, ShipCom has a direct interest in those proposals the FCC will support at WRC-12 regarding the maritime service in the HF spectrum. ShipCom hereby respectfully submits its comments regarding these proposals.

ShipCom believes that certain changes to Appendix 17 would have a negative impact on ShipCom's ability to provide service to its customers and that the same would be true for other similarly licensed maritime radio stations operating in other worldwide regions.

ShipCom opposes the adoption of certain portions of IWG-1 Agenda item 1.9. In addition ShipCom opposes certain changes to Appendix 17 part A. The scope of this formal opposition to the cited items follows.

Comments

Agenda Item 1.9

Parts 1,2,3

IWG-1 Agenda Item 1.9, Parts 1, 2, 3, calls for the Commission's support of recommendations at WRC-12 that would have a severe negative impact on the operations of ShipCom stations WLO, KNN, KLB, WCL and other coast stations using NBDP world wide.

Agenda item 1.9 (Part 1,2,3) proposes to significantly reduce the number of frequencies assignable to NBDP. While ShipCom recognizes that the use of NBDP has been on the decline, ShipCom stations still derive a significant portion of their revenue from NBDP operations in the 4, 6, 8, 12, 16, 18/19, 22, and 25/26 MHz bands. The proposed changes would cause an undue financial burden on ShipCom by forcing ShipCom to expend significant sums to modify its equipment to shift operations to newly assigned channels, if these channels would even be available.

The proposed changes affect a large portion of ShipCom's now-licensed frequencies, In the 4 MHz band ShipCom loses 83 percent of its now licensed channels. In the 6 MHz band ShipCom loses 71 percent of its now licensed channels. In the 8 MHz band ShipCom loses 100 percent of its now licensed channels. In the 12 and 16 MHz bands ShipCom loses 93 percent of its now licensed channels. ShipCom loses 100 percent of its now licensed channels in the 18/19, 22, and 25/26 MHz bands.

ShipCom would be unable to serve the majority of its NBDP customers with its remaining channels under this proposal.

The burden to make the necessary modifications to infrastructure equipment and antennas systems would be unduly onerous.

The proposed changes likewise result in only a small net increase in the amount of spectrum available for wideband data transmission by coast stations. As an example, in the 4MHz band there are sixteen allocated 0.5KHz bandwidth channels, for a total bandwidth of 8 KHz. The proposal provides that four of these channels (2 KHz of bandwidth) be retained for NBDP. The result is a remaining 6 KHz of bandwidth available for data transmission. If a wideband data transmission channel is considered to be 6 KHz wide, as in the case of some ISB systems, then only one wideband channel would be available in the 4 MHz band allocation world wide. If a wide band channel is considered to be 3 KHz wide then only two channels are available world wide.

It is also important to note that the frequencies selected for retention as NBDP frequencies in the 4, 6, 8, and 16 MHz bands fall near the middle of the frequency range for each respective band. In the case of the 4 MHz band, and according to the proposed new plan, only 3.5 KHz of spectrum is retained at the lower end of the band and only 2.5 KHz is retained at the upper end. ShipCom believes this is an inefficient division of this and other bands. This proposed frequency plan eliminates any possibility of using more than one channel of 3.0 KHz bandwidth. It does not allow for any use of a 6 KHz channel. Even if the frequencies retained for NBDP are moved to either end of the band, we are left with two 3.0 KHz channels world wide or only one 6.0 KHz channel world wide in the 4 MHz band. ShipCom alone would require more than 2 channels to support its current operations. If ShipCom were licensed to these channels there would be no available spectrum for other stations to operate in this band. Conversely if some other station were licensed in this band there would be no available spectrum for ShipCom to continue its operations or to engage in newer wide band technologies. Selecting either end of the band for NBDP also creates the need to reassign the frequencies used for Distress and Safety NBDP in the Global Maritime Distress Safety System (GMDSS). This would force the modification of equipment aboard every compulsory equipped vessel using the GMDSS as well as the associated shore stations.

Taking the effects of the proposed Plan even further, in the 6MHz band only two channels of 6.0 KHz bandwidth or four channels of 3.0 KHz bandwidth would be available. However, because of the proposed NBDP allocation only one usable 3.0 KHz channel would exist at the low end of the band and only two 3.0 KHz channels would exist in the higher portion of the band.

In the 8 MHz band the proposal would yield only two usable 6.0 KHz bandwidth channels or four 3.0 KHz bandwidth channels.

In the 12 MHz band the proposal would yield only eight 6.0 KHz channels or sixteen 3.0 KHz channels as opposed to the eighty nine currently available narrow band channels.

In the 16 MHz band the proposal would yield ten 6.0 KHz channels or twenty 3.0 KHz channels.

The proposed changes completely eliminate NBDP in the 18/19, 22 and 25/26 MHz bands. Because of the long range propagation characteristics of these bands, the bands are of more importance than in the past due to the decreased number of Public Coast Stations world wide.

ShipCom believes that the spectrum gained under the current proposal is minimal at best and does not justify the proposed changes in the NBDP Coast Station portions of appendix 17.

Agenda Item 1.9

Part 5

ShipCom is particularly concerned with Agenda Item 1.9 part 5 which proposes to:

“Neither specify nor limit the bandwidth of new digital transmissions”

ShipCom believes that part 5 as proposed is inappropriate. By not specifying the bandwidth or the limits of bandwidth of new digital transmissions it is conceivable that a single station could occupy the entire spectrum available in any given band thereby leaving no spectrum available for other stations world wide to use. Among other obvious ramifications is the possibility of creating a de facto monopoly. The number of Coast Stations would be significantly reduced due to the lack of available bandwidth for Coast Station transmissions. ShipCom feels that it is essential that bandwidth limitations be placed on any frequency allocations in all appendix 17 and other maritime spectrum.

Agenda Item 1.9

Part 6

Agenda Item 1.9 part 6 proposes to

“Allow stations using wide-band telegraphy or Morse telegraphy A1A/A1B to continue on their currently assigned frequencies subject to not claiming protection from nor causing harmful interference to stations in the maritime mobile service using digital data transmissions;”

While ShipCom agrees that the use of A1A and A1B is very minimal, ShipCom would support retaining one or two frequencies assignable to coast stations and one or two working frequencies assignable to Ship stations in each band; in addition to the retention of a calling frequency in each band. ShipCom is aware that there is at least one Coast Station in the United States and in other countries that operate A1A and A1B. A protected frequency for these operations, especially if it were located at either end of the band, would allow these stations to continue operations and would require very little spectrum. In addition these frequencies could also be used as control channels for certain types of wide band data systems and to further develop robust narrowband technologies that could be used to disseminate safety information to ships at sea if these stations discontinue their A1A and A1B operations.

ShipCom proposes that:

- a) The changes referenced in Agenda 1.9 parts 1,2,3 be rejected in their current form.
- b) The changes referenced in Agenda item 1.9 part 5 be rejected in favor of some specification to bandwidth limitations.
- c) The changes referenced in Agenda item 1.9 part 6 be rejected in their current form in favor of the allocation of one or two protected frequencies as stated above.
- d) Any ITU approved A-17 spectrum re-organization be done on an incremental basis in order to facilitate an orderly transition as the use of NBDP declines. Specifically that the First implementation not occur until 2016 with the final

implementation occurring in 2020. If any part of the proposed changes are adopted this would give time to Coast Stations to effect the changes that would be necessary.

- e) That the licensing fees associated with frequency applications be waived where such applications are as a result of A-17 re-organization.

Respectfully submitted,
ShipCom, LLC.

By: Rene Stiegler, President