



World Meteorological Organization
Organisation météorologique mondiale

Secrétariat

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Our ref.: 11689-12/OBS/WIS/CTS/FREQ

Ms Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
WASHINGTON, D.C. 20554
USA

GENEVA, 21 December 2012

Subject: WMO comments in opposition to Rule-Making Request RM-11681: "Petition for Rulemaking to Allocate the 675-1680 MHz Band for Terrestrial Mobile Use" submitted by LightSquared Subsidiary LLC

Dear Ms Dortch,

The World Meteorological Organization (WMO) has noted the Petition for Rulemaking RM-11681: "Petition for Rulemaking to Allocate the 675-1680 MHz Band for Terrestrial Mobile Use" submitted by LightSquared Subsidiary LLC.

WMO is the United Nations Specialized Agency with responsibility for coordinating international activities in meteorology, climatology, operational hydrology and related geophysical sciences. WMO has responsibility for advising the sovereign states that are its Members on the potential impacts of the use of the radio spectrum on these sciences, including the impact on operational weather forecasting.

WMO notes that in its petition, LightSquared asks for an amendment of the U.S. Table of Frequency Allocations to add a primary allocation permitting non-Federal terrestrial mobile use of the 1675-1680 MHz band. LightSquared refers to its proposal in IB Docket IB 12-340 to permanently relinquish its right to deploy terrestrial downlink operations at 1545-1555 MHz and to permanently relocate those terrestrial operations instead to 1670-1680 MHz.

WMO recognizes the legitimate actions LightSquared is taking in finding solutions to deploy its broadband network and that this is a US national issue. However, WMO is extremely concerned about the potential precedence setting nature of this solution should it be implemented.

As you are aware, the 1675-1710 MHz band is allocated on a co-primary basis to the Meteorological Aids Service (METAIDS) and the Meteorological Satellite Service (METSAT) (Space-to-earth). The 1675-1680 frequency range is actually used for raw data downlink and for the retransmission of Data Collection Platform data.

Atmospheric soundings form the basis of all weather modelling and forecasting. Atmospheric soundings in the USA are made with radiosondes utilizing the 1680 MHz frequency. As is the case in the USA, the Caribbean nations also use 1680 MHz radiosondes, and this information is vital in providing warnings for severe weather (e.g. tornados and hurricanes forecasting) in the region. Furthermore, 1680 MHz radiosondes are also used globally, including in the USA, by radio theodolite systems, which are independent sounding systems that do not rely on GPS or other navigation aids.

I refer you to ITU Resolution 673 (Rev. WRC-12) and to WMO Resolution 11 (EC-64), both of which highlight the importance of Earth Observations and their social and economic value. Successful weather forecasting for the USA relies on the supply of observations from other countries that use these frequencies in their observing programmes. Setting a precedent within the USA that uses these frequencies for other than meteorological purposes would weaken the ability of other, less influential, nations to retain these frequencies for meteorological observing. The resulting loss of observations from these countries would harm the ability of all countries, including the USA to forecast and respond to severe weather events.

WMO, therefore, urges you to take into account the importance of the global harmonization of frequencies allocated and used in the Earth Observing Systems. WMO further urges you to take a global view and to avoid this precedence.

Thank you for the opportunity to comment on this proposal.

Yours sincerely,



(J. Lengoasa)
for the Secretary-General

cc: Mr J Hayes, Permanent Representative of the USA with WMO, Silver Spring
Dr B Ryan, Director, Group on Earth Observations, WMO Secretariat