

Please dismiss this proposal for the administrative and technical reasons stated in the comments by the American Radio Relay League.

Additionally:

-The proposed automated contention based interference detection would be ill suited to detect a common operating style of amateur radio operators on this band, namely temporary (1-12 hour) operation from fixed locations from hill tops or shorelines.

-The proposal does not address potential interference issues with services in Canada or other countries. I am an amateur radio operator and regularly use the 10 GHz band for contacts across Lake Erie to Ontario, Canada. Amateurs on the north shore of Lake Erie could be subject to severe interference from this proposed service and would not be able to hear my transmitter, even if I could detect no interfering signals from this service (when my directional antenna is pointed out over the lake). This would preclude two way communications.

-The proposal is flawed because it discusses rain fade, but it does not discuss transmission impairments caused by multipath and doppler-shift caused inter-symbol interference from heavy rain and snow. These can be very severe in the 10 GHz band so "99.999% uptime" is not likely to be realistic in most of the U.S.A. despite the excessive power levels proposed.