

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 2015 World Radiocommunication)
Conference)

To: The Commission

**COMMENTS OF ARRL, THE NATIONAL ASSOCIATION
FOR AMATEUR RADIO**

ARRL, the national association for Amateur Radio, formally known as the American Radio Relay League, Incorporated (ARRL), by counsel and pursuant to the *Public Notice*, DA 14-1248, released August 28, 2014, hereby respectfully submits its comments with respect to certain draft recommendations of the 2015 World Radiocommunication Conference (WRC-15) Advisory Committee (WAC) on issues that will be considered at WRC-15, as well as a draft proposal provided to the FCC by the National Telecommunications and Information Administration. Specifically, ARRL’s comments address three WRC-15 agenda items: item 1.1, which considers additional spectrum allocations to the mobile service and identification of additional frequency bands for International Mobile Telecommunications (IMT); item 1.4, which considers an allocation to the Amateur Service in the band 5250-5450 kHz; and item 9.1.8, which considers regulatory procedures for the facilitation and deployment of nanosatellites and picosatellites. For its comments on the WAC Recommendations and NTIA proposal listed above, ARRL states as follows:

I. The NTIA Proposal For No Change On Agenda Item 1.4 Is Not Supported By Fact, Domestic Practice, or International Practice.

1. Document WAC/076 contains a proposal from the NTIA calling for no change at 5250-5450 kHz in response to agenda item 1.4. ARRL is able to concur with the view that the 5250-5275 kHz range should be excluded from consideration, for reasons previously stated in the WRC Advisory Committee's view on agenda item 1.4 and in ARRL's comments thereon.¹ The remainder of the proposal is unsupportable in light of actual domestic and international practice, and contains assertions of incompatibility that are demonstrably not correct.

2. The United States has authorized operation on a discrete number of channels within the 5275-5450 kHz frequency range for more than a decade. A number of other administrations have made similar, and in some cases, more generous accommodations to the amateur service. ARRL is not aware of *any* instance of an amateur station being unable to resolve an instance of interference with incumbent operations during the history of amateur operation in this frequency range, despite a standing invitation from ARRL to help resolve any such matters. Against this backdrop, the stated reason for the no change proposal, that “[e]xperience has shown that sharing is not possible between the amateur service and the fixed and mobile service,” fails the straight-face test.

3. The NTIA proposal is particularly puzzling given the position of federal agencies to allow a *more disruptive* service (radiolocation) in the *identical* frequency range under consideration here *less than three years ago*. We reiterate that the United States position with respect to the 5250-5450 kHz frequency band at the previous World Radiocommunication Conference sought a broad allocation to the radiolocation service across the entire frequency range. With the exception of the 5250-5275 kHz segment, this is exactly the same treatment that

¹ See Comments of ARRL in this same docket, February 18, 2014, ¶2.

ARRL now seeks and that the WAC has recommended for the amateur service. As argued by NTIA *less than three years ago*, the allocation of a broad frequency band on a secondary basis to a new service permits effective operation in the new service by providing maximum flexibility to avoid interference to incumbent, primary services.

4. Neither NTIA nor its constituent federal agencies have credibly or persuasively articulated why fixed and mobile systems in the 5250-5450 kHz range can withstand the demonstrated potential for interference from automated, wideband, HF oceanographic radars, but cannot withstand operation by trained, licensed operators using smaller bandwidths, actually monitoring the spectrum to be used before and during a transmission, and with the capability to shift frequency immediately to avoid incidents of interference with a primary service. In the absence of such articulation, ARRL continues to assert that the same treatment proposed for HF radiolocation by NTIA and many its same constituents *less than three years ago* is warranted for the amateur service, particularly since amateur stations would, on average, occupy narrower bandwidths for shorter durations than the radiolocation systems under consideration in 2012. Proponents of a different treatment, particularly a channelized treatment or a no change approach, have still not presented a compelling distinction between amateur operation and radiolocation that would justify a departure from the general policy followed by the United States at WRC-12.

II. The Efficient Consideration Of Agenda Item 1.1 Requires Explicit Bounds On The Frequency Range Under Consideration.

5. ARRL supports View A as expressed in Document WAC/084, and endorses a no change proposal on agenda item 1.1 for frequencies above 6425 MHz. Agenda item 1.1 is unique in that there are no bounds to the frequency range under consideration. The failure to set

bounds was a mistake, inviting a lack of focus in the conduct of ITU-R preparatory work and in eventual proposals to WRC-15.

6. While bands above 6425 MHz have not been studied under agenda item 1.1, there is no text in the agenda item or the supporting resolution that would preclude a proposal for a mobile allocation or IMT identification above 6425 MHz from being considered in scope. By explicitly asserting that frequencies above 6425 MHz have not been studied and ought not to be considered, the United States would be well positioned to resist any such proposals that may be made by other administrations.

III. Any Necessary Regulatory Changes For Nanosatellites And Picosatellites May Be Addressed Under Standing Agenda Item 7 At WRC-19.

7. ARRL does not dispute that studies on nanosatellites and picosatellites being conducted in ITU-R are mature, and welcomes the intent of Document WAC/092 to simplify the advance agenda of the 2019 World Radiocommunication Conference by calling for continued education of administrations and operators on regulatory issues affecting nanosatellite and picosatellite systems.

8. Our general support for the approach advocated in Document WAC/092 is conditioned on the inclusion of the *recognizing* clause referencing Resolution 642 in the proposed amendment to Resolution 757. Nothing in the studies conducted so far justifies a departure from the procedures in Resolution 642 being an option for nanosatellites and picosatellites that are properly licensed in the amateur-satellite service and are operated consistent with the purposes of the amateur and amateur-satellite services.

9. While further consideration of regulatory changes addressing nanosatellites and picosatellites may be appropriate in the future, such could be accommodated under the standing agenda item 7, which addresses advance publication, coordination, notification and recording

procedures for frequency assignments pertaining to all satellite networks. While such work may eventually be deemed necessary, it is not necessary to complicate the WRC-19 agenda to accomplish it.

Therefore, the foregoing considered, ARRL, the national association for Amateur Radio, encourages the Commission's support of the views expressed herein in the development of United States positions for WRC-15.

Respectfully submitted,

**ARRL, THE NATIONAL ASSOCIATION FOR
AMATEUR RADIO**



By: _____

Brennan T. Price
Its Chief Technology Officer

225 Main Street
Newington, CT 06111-1494

Washington Area Office
3545 Chain Bridge Road, Suite 209
Fairfax, VA 22030-2708
(703) 934-2077

September 12, 2014