

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

|                                |   |                      |
|--------------------------------|---|----------------------|
| In the Matter of               | ) |                      |
|                                | ) |                      |
| Recommendations Approved By    | ) | IB Docket No. 04-286 |
| The Advisory Committee For The | ) |                      |
| 2015 World Radiocommunication  | ) |                      |
| Conference                     | ) |                      |

**COMMENTS OF IRIDIUM SATELLITE LLC**

Iridium Constellation LLC (“Iridium”) hereby files comments on two draft recommendations of the Advisory Committee for the 2015 World Radiocommunication Conference (“Advisory Committee” or “WAC”) as set forth in Attachment A to the Commission’s *Public Notice*<sup>1</sup> in the above-captioned proceeding.

Iridium supports the Advisory Committee’s position with respect to Agenda Item 1.1, *i.e.*, that the U.S. should recommend no change (“NOC”) for frequency bands above 6425 MHz. Iridium agrees with the Advisory Committee that the finding of the expert group (WP 5D) that no bands above 6 GHz are suitable for International Mobile Telecommunications (“IMT”) should be dispositive.

Iridium does not oppose the recommendation of the Advisory Committee with respect to Agenda Item 9.0, *i.e.*, that the Table of Allocations should permit fixed-satellite service networks in the 19.7-20.2 GHz and 29.5-30 GHz bands to include links between earth stations that are at unspecified points or in motion (“ESOMPs”). It

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<sup>1</sup> DA 14-1248 (Aug. 28, 2014).

should be made clear, however, that any action on the recommendation does not prejudice issues relating to ESOMP operations in other FSS bands.

**I. A NOC RECOMMENDATION SHOULD BE MADE WITH RESPECT TO AGENDA ITEM 1.1 FOR FREQUENCIES ABOVE 6425 MHz.**

Agenda Item 1.1 (WAC/082 (27.08.14)) proposes with respect to frequencies above 6425 MHz “to consider additional spectrum allocations to the mobile service on a primary basis and identification of additional frequency bands for International Mobile Telecommunications (IMT).” Iridium agrees with the Advisory Committee that the U.S. position on this agenda item should be NOC.

The expert group (WP 5D) that was charged to identify suitable bands for IMT did not identify any bands above 6425 MHz. This group’s finding should be dispositive.

Moreover, no compatibility studies of bands above 6425 MHz were conducted in JTG 4-5-6-7. Although proponents of additional spectrum allocations for IMT above 6425 MHz have recently initiated compatibility studies, the studies will not be completed in time to be adequately considered in advance of WRC-15. Given these circumstances, the U.S. should oppose any efforts to add allocations at WRC-15 for frequencies above 6425 MHz.

Iridium is concerned that proponents of Agenda Item 1.1 may attempt to target Ka-band frequencies in the 17.3-30 GHz band for an IMT allocation. Proposals in ITU-R-WP 5D and JTG 4-5-6-7 to permit use of this band for IMT were highly contentious, and for good reason. Ka-band frequencies are seeing rapidly increased use

for satellite services – including critical feeder link applications and planned high-density FSS deployments. High-density terrestrial mobile deployments would be incompatible with these existing satellite uses, and a NOC position by the U.S. should help quell pursuit of this path.

Comfort cannot be taken from the fact that no specific frequencies have been identified in the agenda item. As the Commission is aware, once an item is on the agenda, it can take on a life of its own at the WRC. Absent a NOC finding, other administrations would be free to make proposals at the conference to use bands above 6425 MHz for IMT. A NOC position, therefore, is essential.<sup>2</sup>

There is precedent that supports submitting a U.S. NOC proposal in the absence of foreign proposals for bands above 6425 MHz. For example, earlier this year the U.S. made a NOC proposal in response to a similar agenda item concerning the 2025-2110 MHz and 2200-2 290 MHz frequency bands.<sup>3</sup> Similarly, NTIA has made a NOC proposal for other bands that potentially could be affected by Agenda Item 1.1.<sup>4</sup>

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<sup>2</sup> Some parties have expressed concerns as to the impact a U.S. NOC position for WRC-15 could have on U.S. proposals for future WRC agenda items. Concerns about what may happen in the future, however, should be left for the future, when they can be addressed in the context of specific and concrete proposals.

<sup>3</sup> Inter-American Telecommunication Commission, Agenda Item 1.1 (2025-2290 MHz Band): Preliminary Proposal for WRC-15, Doc. No. CCP.II-RADIO/doc. 3468/14 (Feb. 24, 2014).

<sup>4</sup> See draft proposals contained in June 24, 2014, letter from Karl B. Nebbia, Associate Administrator Office of Spectrum Management, to Mindel De La Torre, Chief of the International Bureau, Federal Communications Commission.

**II. AGENDA ITEM 9.0 SHOULD NOT BE USED TO PREJUDGE ISSUES RELATING TO OTHER FSS BANDS.**

Iridium does not oppose the Advisory Committee's recommendation for Agenda Item 9.0 (WAC/091 (27.08.14)) that the Table of Allocations permit fixed-satellite service ESOMP links in the 19.7-20.2 GHz and 29.5-30 GHz bands. Proper attention needs to be given, however, to the potential bleed over effect of the current proposal to future proposals for ESOMPs. It should be made clear, therefore, that any action on the current proposal does not prejudice issues relating to ESOMP operations in other FSS bands.

**III. CONCLUSION**

For the reasons set forth above: (i) the Advisory Committee's recommendation for Agenda Item 1.1 (IMT on frequencies above 6425 MHz) should be adopted; and (ii) if the Advisory Committee's recommendation for Agenda Item 9.0 (ESOMPs) is adopted, it should be stated that no prejudgments are being made as to ESOMP operations in other FSS bands.

Respectfully submitted,

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