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Via E-mail and U.S. Mail  
[Julius.Knapp@fcc.gov](mailto:Julius.Knapp@fcc.gov)

Mr. Julius Knapp, Chief  
Office of Engineering and Technology  
Federal Communications Commission  
445-12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

Re: ET Docket 12-338, Implementation of the Final Acts of  
The World Radiocommunication Conference (Geneva 2007)

Dear Mr. Knapp:

The purpose of this letter, written on behalf of my client, ARRL, the national association for Amateur Radio, is to request that long-overdue final action be taken relative to the *Notice of Proposed Rule Making and Order*, FCC 12-140, 27 FCC Rcd. 14598, released November 19, 2012 (the "Notice"), a docket proceeding that is now *two years old*. The Notice proposed, among other things, to elevate the existing secondary Amateur Service allocation in the upper half (i.e. 1900-2000 kHz) of the 160-meter Amateur allocation (1800-2000 kHz) to primary status. *The 1900-2000 kHz band is now allocated internationally to the Amateur Service on a primary basis.* However, under the terms of Footnote US290, domestically the band 1900-2000 kHz is secondary to the radiolocation service for Federal and non-Federal use.

The Notice proposed to (1) amend the U.S. Table (47 C.F.R. § 2.106) to remove the Federal and non-Federal radiolocation allocations from the 1900-2000 kHz band; (2) raise the secondary Amateur Service allocation to primary status in that band segment; (3) delete US290 from the list of U.S. footnotes in the Table of Allocations; (4) delete the 1900-2000 kHz band and limitations that pertain only to that band from the Radiolocation Service Frequency Table in Section 90.103(b) of the Commission's rules; and (5) amend Section 97.303 by revising paragraph (c) thereof to remove the 1900-2000 kHz segment from the list of frequency segments that are allocated to the radiolocation service in the United States and other nations.

There was but one comment questioning this proposed action, filed by a manufacturer of offshore ocean buoys which have been illegally deployed for years and which have caused and continue to cause severe interference to authorized users of the 1900-2000 kHz band. *All other comments filed were favorable to this proposal.* There is no substantive reason why this portion of the Docket should not have been resolved prior to 2014.

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The Commission's inexplicably long delay in resolving this docket proceeding and implementing the two-year old Notice proposal has put Amateur Radio licensees in a seriously disadvantageous position that clearly the Commission did not intend relative to use of the 1900-2000 kHz band in the United States.

Recently, a strong interfering signal has been detected at times by radio Amateurs on or about 1915 kHz, emanating from a radar facility located near Halifax, Nova Scotia. This facility, though consistent with Canada's domestic table of allocations, is causing substantial harmful interference in the United States to large numbers of Amateur Radio stations operating in the 1900-2000 kHz band. Because of the inordinate delay in resolving Docket 12-338, United States Amateur Radio licensees apparently are not in a position to complain about this harmful interference, given the current wording of Section 97.303(c) of the Commission's Rules, which reads as follows:

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(c) Amateur stations transmitting in the 1900-2000 kHz segment... must not cause harmful interference to, and must accept interference from, stations authorized by the United States Government, the FCC, or other nations in the radiolocation service.

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It is respectfully requested, therefore, that the Office of Engineering and Technology reprioritize this Docket proceeding and, if necessary, sever from it the 1900-2000 kHz band allocation issue and issue a Report and Order with respect to that band, modifying Sections 2.106 and 97.303 of the Commission's Rules appropriately so that the purposes of the Docket proceeding can be effectuated without further delay.

We would greatly appreciate knowing the timetable for the Commission's addressing this Docket proceeding in any case.

Yours very truly,



Christopher D. Imlay  
General Counsel, ARRL