

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 14-88, released January 28, 2014, hereby respectfully submits its comments with respect to the draft recommendations of the 2015 World Radiocommunication Conference (WRC-15) Advisory Committee (WAC) on issues that will be considered at WRC-15. Specifically, ARRL’s comments address WAC recommendations relative to two WRC-15 agenda items: Item 1.4, which considers an allocation to the Amateur Service in the band 5250-5450 kHz; and Item 1.12, which considers allocations in the bands 8700-9300 MHz and 9900-10500 MHz. For its comments on the WAC Recommendations<sup>1</sup> in the interests of the Amateur Radio Service therein, ARRL states as follows:

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<sup>1</sup> The *Public Notice* states that the International Bureau, in coordination with other Commission Bureaus and Offices, tentatively concludes that it can generally support “most” of the WAC draft recommendations attached to the *Public Notice*.

## **I. The Recommendation For Agenda Item 1.4 Permits Maximum Flexibility For Radio Amateurs To Operate Near 5.3 MHz While Avoiding Conflict With Primary Services.**

1. Document WAC/069 recommends a secondary allocation to the amateur service at 5275-5450 kHz. Such an allocation would permit maximum flexibility for amateur stations to operate while meeting their absolute and undisputed obligation to not cause interference to incumbent, primary services (fixed and mobile). ARRL supports the recommended proposal for the reasons described in the document.

2. The recommendation excludes the 5250-5275 kHz frequency band because of the worldwide allocation to the radiolocation service authorized at WRC-12. This allocation is intended for oceanographic applications which occupy substantial bandwidths and operate for substantial durations. Past operational experience has established that radiolocation of this type is not compatible with amateur service operation, and the exclusion of this segment is warranted.

3. ARRL notes that the United States position with respect to the 5250-5450 kHz frequency band at the previous World Radiocommunication Conference sought exactly the same treatment for the radiolocation service that ARRL now seeks for the amateur service: the allocation of a broad frequency band on a secondary basis to a new service, permitting effective operation in the new service by providing maximum flexibility to avoid interference to incumbent, primary services. In ARRL's view, the same treatment is warranted for the amateur service; 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, have not presented a compelling distinction between amateur operation and radiolocation that would justify a departure from the general policy adopted on the advice of federal agencies less than three years after its adoption.

## **II. The Recommendation for Agenda Item 1.12 Reflects A Proven, Successful Arrangement For Accommodating Earth Exploration Satellite And Amateur Operation In The Same Band.**

4. Document WAC/073 proposes to allocate the 9.9 – 10.5 GHz band to the earth exploration-satellite service on a secondary basis. The recommendation of the WAC offers a way to protect incumbent operation in the amateur and amateur-satellite services that is not reflected in the parallel proposal from the NTIA (Document WAC/059), upon which the WAC proposal is based.

5. ARRL does not dispute that ITU-R studies conclude that the interference potential to incumbent services in the frequency range under consideration is nominal. Further, there is one other instance in the Table of Allocations, at 432-438 MHz, where the earth exploration-satellite service shares spectrum with the amateur service, both on a secondary basis, and successfully so. However, ITU-R studies have not fully considered the effect of space-directed operation in the amateur and amateur-satellite services on the measurements that earth exploration satellites would make, using the same spectrum. For instance, in the amateur-satellite service, the 10.45-10.5 GHz allocation has been used for both uplinks and telecommand of amateur satellites, the latter being required by international treaty and domestic regulation.

6. Existing operation by amateur and amateur-satellite service stations in the earth-to-space direction should not be precluded by the introduction of a new service. By proposing a secondary allocation to the earth-exploration satellite service, the WAC recommends a solution that has precedent at 432-438 kHz and maintains the right to operate existing stations in the amateur and amateur-satellite services. As the Commission engages with NTIA to reconcile the views in Documents WAC/059 and WAC/073, ARRL urges that existing operations in the

amateur services be considered and accommodated, either as reflected in Document WAC/073, or through some other appropriate provision of the United States proposal.

Therefore, the foregoing considered, ARRL, the national association for Amateur Radio, encourages the Commission's support of the recommendations found in Documents WAC/069 and WAC/073 in the development of United States positions for WRC-15.

Respectfully submitted,

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

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February 18, 2014