

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of:

International Bureau Seeks Comment on	)	
Recommendations Approved by the World	)	IB Docket No. 16-185
Radiocommunication Conference Advisory	)	
Committee	)	

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

ARRL, the national association for Amateur Radio, also known as the American Radio Relay League, Incorporated (“ARRL”), submits these comments in response to the Public Notice seeking comment on the draft recommendations approved by the World Radiocommunication Conference Advisory Committee (“WAC”) on October 20, 2020.<sup>1</sup> ARRL responds to two of the draft recommendations, WAC-23/0015 / IWG-2/009r2 (10.07.20) (addressing 3.3-3.4 GHz) and WAC-23/0018 / IWG-2/012r1 (10.07.20) (addressing 10.0-10.5 GHz).

**I. Introduction**

ARRL is the national organization of amateur radio operators in the United States. Its representatives have actively participated in the work of the WACs for

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<sup>1</sup> International Bureau Seeks Comment on Recommendations Approved By World Radiocommunication Conference Advisory Committee, IB Docket No. 16-185, DA 20-1243 (rel. Oct. 22, 2020).

this and past World Radio Conferences.

Since 1947 radio amateurs in ITU Region 2 have operated in the 3.3-3.4 GHz and the 10.0-10.5 GHz bands that are subjects of WRC-2023 considerations. Radio amateur use is on a secondary basis and subject to all of the protections accorded primary users.<sup>2</sup> Radio amateurs in all three ITU Regions also have secondary status in the 10.0-10.5 GHz band.

Radio amateurs make substantial use of both bands. They have conducted experiments and designed systems that protect primary users. The lack of interference complaints is evidence that they have been successful in doing so. In this manner new spectrum horizons are explored and new techniques are developed that put spectrum to productive use that otherwise would represent lost opportunities and waste of the natural resource.

## **II. No Change Should be Made to the 3.3-3.4 GHz Amateur Service Secondary Allocation**

While there is no suggestion in WAC-23-0015 that the international secondary allocation to the Amateur Service in ITU regions 2 and 3 for 3.3-3.4 GHz should not continue, we believe it important to affirm our strong belief that the secondary allocation continues to be important and useful. In Region 2, this spectrum was allocated on a primary basis to the Amateur Service in 1947. In

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<sup>2</sup> See 47 C.F.R. § 97.303. Secondary status for the Amateur Service extends from 3.3 to 3.5 GHz in Region 2, but only the 3.3-3.4 GHz portion is subject to consideration in this proceeding. Radio amateurs in ITU Region 3 have similar secondary status in the 3.3-3.5 GHz band.

1959, the allocation was changed to secondary and radiolocation was made primary.

Sharing between primary users and secondary amateur radio users has been highly successful and the U.S. domestic Table reflected the International allocations until this year. On September 30, 2020, the Commission adopted an Order to delete the secondary allocations to the Amateur Service and Amateur-Satellite Service in the 3.3-3.5 GHz spectrum. However, amateur radio operations are permitted to continue on a secondary basis subject to decisions to be made on issues raised in the Further Notice of Proposed Rulemaking adopted in WT Docket No. 19-348.<sup>3</sup>

Although the Commission regrettably has taken this recent action, the results will only become apparent well into the future. The technical characteristics and future operations of new users are not well-defined at this time. In the immediate future, the Commission is addressing future uses and licensing only in the 3.45-3.5 GHz portion of the band, outside the 3.3-3.4 GHz portion to be addressed at WRC-2023. The Commission also has allowed experimental licensees to continue to operate throughout this spectrum on a *de facto* secondary basis. Consequently, as of this date the Commission has not proposed any changes to the services that

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<sup>3</sup> See In the Matter of Facilitating Shared Use in the 3100-3550 MHz Band, Report and Order, 85 Fed.Reg. 64062 (publ. Oct. 9, 2020); Further Notice of Proposed Rulemaking, 85 Fed.Reg. 66888 (publ. Oct. 21, 2020).

employ 3.3-3.4 GHz, other than to delete the secondary Amateur Service and Amateur-Satellite Service allocations while permitting amateur operations to continue on a secondary basis until later decisions are made.

We therefore urge that no consideration be given to changing the amateur secondary allocation in the 3.3-3.4 GHz band during the WRC-2023 process. The situation in other countries is not necessarily reflective of that in this country, and in any event the Amateur Service should remain secondary in the international allocations until more is known about the technical characteristics of equipment that will be used by new services and the extent of geographic build-out.

### **III. No Change Should be Made to the 10.0-10.5 GHz Amateur Service and Amateur-Satellite Service Secondary Allocation**

As with WAC-23-0015, above, there is no suggestion in WAC-23-0018 that the worldwide secondary allocations for the Amateur Service and Amateur-Satellite Services should not continue in the 10.0-10.5 GHz band. We believe it especially important to affirm that the secondary allocation will be available to radio amateurs and that no consideration will be given to change it. This spectrum was allocated on a primary basis for amateur radio purposes in 1947. In 1959, the allocation was changed to secondary and radiolocation was made primary. Sharing between primary users and secondary radio amateur users has been highly successful and the U.S. domestic Table of Allocations reflects the International allocation.

The 10.0-10.45 GHz band has been used for many amateur terrestrial experiments and tests that have helped to develop the technical characteristics of the band. The adjacent amateur satellite allocation at 10.45-10.5 GHz is in daily use throughout much of the world and important to the Amateur-Satellite Service.<sup>4</sup>

#### **IV. Conclusion**

The radio amateurs who operate on the secondary spectrum discussed above have developed and honed their equipment and capabilities to share with the existing services. The Amateur Service has earned its reputation for making careful and non-preclusive use of its secondary allocations and will continue doing so. Therefore we respectfully request that the Amateur Service and Amateur-Satellite Service be continued as secondary services in the above bands.

Respectfully submitted,

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<sup>4</sup> The downlink for Qatari amateur satellite Es'hail-2, Qatar OSCAR-100, is operating in the 10 GHz amateur satellite band and used daily by radio amateurs worldwide.