

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

In the Matter of)	
)	
WRC-11 ADVISORY COMMITTEE)	IB Docket No. 04-286
)	
Recommendations Approved by the Advisory Committee for the 2011 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* dated September 3, 2009, DA 09-1994 (the Public Notice), hereby respectfully submits its comments regarding recommendations made by the WRC-11¹ Advisory Committee (WAC) and proposals provided to the FCC by the National Telecommunications and Information Administration (NTIA). Specifically, ARRL supports the recommendation of the WAC with respect to Agenda Item 1.23 and opposes the adoption of NTIA’s proposal on this Agenda Item as a United States position.

I. Introduction and Background

1. Agenda Item 1.23 calls on the next World Radiocommunication Conference “to consider an allocation of about 15 kHz in parts of the band 415-526.5 kHz to the amateur

¹ ARRL understands that the Advisory Committee is still formally titled the “WRC-11 Advisory Committee,” although ITU has changed the date of the next World Radiocommunication Conference to 2012 since the Committee’s inception.

service on a secondary basis, taking into account the need to protect existing services[.]”²
The spectrum between 415-526.5 kHz is currently allocated to the maritime mobile and aeronautical radiolocation services, with some variation in the allocations among the three ITU Regions.

2. As reflected in Document WAC/053,³ the WAC has proposed a secondary allocation to the Amateur Service from 495-510 kHz. NTIA, as reflected in Document WAC/040,⁴ has proposed “no change” in the existing allocation. Obviously, reconciliation is necessary to arrive at a uniform position of the United States in preparations for the next WRC.

II. The WAC Proposal Should Be Adopted

3. The proposal put forth by the WAC acknowledges the need to protect incumbent services, particularly NAVTEX transmissions at 490 and 518 kHz. The WAC proposal of a secondary Amateur allocation from 495-510 kHz provides nearly 5 kHz of separation from NAVTEX operation at 490 kHz and nearly 8 kHz of separation from operation at 518 kHz.⁵ The separation afforded this existing and obviously vital maritime application is more than that mandated from incumbent stations in the maritime mobile service. This separation is aimed at providing the protection called for by footnote 5.82B of the Radio Regulations.⁶

² Agenda Item 1.23, Resolution 805 (WRC-07) (Agenda for the 2011 World Radiocommunication Conference)

³ WAC Draft Proposal for the Work of the Conference, Agenda Item 1.23, adopted September 1, 2009.

⁴ Letter from Karl B. Nebbia to John Giusti, August 11, 2009.

⁵ NAVTEX is an application of direct printing telegraphy, as defined by ITU-R Recommendation M.476-5. The bandwidth of a NAVTEX receiver is recommended to be between 270 and 340 Hz. *Id.* Annex 1 § 1.5 NOTE 1.

⁶ Footnote No. 5.82B advises, “Administrations authorizing the use of frequencies in the band 495-505 kHz by services other than the maritime mobile service shall ensure that no harmful interference is caused to the maritime mobile service in this band or to the services having allocations in the adjacent bands, noting in particular the conditions of use of the frequencies 490 kHz and 518 kHz, as prescribed in Articles 31 and

4. While NAVTEX remains an active and vital application, it is not reasonably in dispute that legacy maritime use of the spectrum around 500 kHz has diminished. Historically, the band 495-505 MHz has been utilized for distress and calling by radiotelegraphy. With the advent and universal adoption of the Global Maritime Distress Safety System, this use for safety of life purposes has vanished, and use of the band otherwise greatly diminished. Two of the past three WRCs have recognized this, as the designation of 500 kHz as an international distress and calling frequency was suppressed at WRC-2000, and the broader designation of 495-505 kHz as a distress and calling band was suppressed at WRC-07. There is simply not sufficient use of this band by incumbent services to suggest that a secondary allocation to the Amateur Service cannot be accommodated at the frequencies proposed.

III. The NTIA Proposal Assumes Systems Not In Operation and NTIA's Concerns May Be Addressed By Other Means

5. NTIA's "no change" proposal cites the universal allocation from 495-505 kHz to the maritime mobile service as providing capability for international harmonization. While this is indisputable, the opportunity for harmonization is dependent upon the common frequencies assigned to the maritime mobile service throughout the world, not the existence or lack of secondary sharing partners within those frequencies. The WAC proposal does not seek to change the primary worldwide allocation to the mobile service from 495-505 kHz anywhere in the world, and harmonized operation therein will be maintained.

6. NTIA also asserts, without explanation, that "the maritime community also has emerging requirements for globally harmonized interoperable maritime spectrum in

52." The WAC proposal seeks to extend this requirement to any amateur stations authorized to operate up to 510 kHz.

support of safety and security requirements in 415-526.5 kHz.” This assertion flies squarely against the removal of the designation of 495-505 kHz as a distress and calling band at WRC-07. The Agenda Item contemplates an analysis of the protection needs of existing services within the 415-526.5 kHz. The existing services necessarily must be analyzed as they presently exist. No characteristics for future, different uses of this band by the maritime mobile service have been proposed, despite solicitations for them.⁷

7. Any concerns regarding interference to incumbent services should be addressable by the ultimate implementation of power limitations and operation protocols, such as those successfully used by Amateur Radio operators within secondary allocations from 10.100-10.150 MHz worldwide, as well as near 5.4 MHz in the United States and several other countries around the world. It is likely that Amateur use of any segment of the 416-526.5 kHz band would predominantly involve radiotelegraphy, as is the case at 10.100-10.150 MHz. A listen-before-transmit protocol, as utilized by amateurs at 10.100 MHz, should be similarly successful at MF.

⁷ See, e.g., ITU-R Study Group Document 5B/290, “Liaison Statement to Working Party 5B on studies related to WRC-11 Agenda item 1.23” (May 22, 2009), *responding to* ITU-R Study Group Document 5A/180, “Reply liaison statement to Working Party 5A, copies to Working Parties 5C, 6A on studies related to WRC-11 Agenda item 1.23” (November 17, 2008). In Document 5A/180, Working Party 5B states, “Prior to identification of preferred frequency bands for secondary amateur allocations in the 415 526.5 kHz bands, the maritime service must first consider existing and future requirements for ship and port safety spectrum in existing maritime spectrum to solve Agenda item 1.10.” Given the typical nature of propagation between 416-526.5 kHz, this suggestion is inappropriate. Ports are relatively small areas; therefore, port safety applications are suited to predominantly locally propagating frequencies, at VHF or higher. Resolution 357 (WRC-07) suggests as much, failing to mention MF as a contemplated solution to Agenda Item 1.10.

IV. Conclusion

Therefore, for all of the above reasons, ARRL, the national association for Amateur Radio, respectfully requests that the Commission support the Agenda Item 1.23 Proposal made by the WAC in accordance with the foregoing.

Respectfully submitted,

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

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