

Donald Abelson
Chief of the International Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Mr. Abelson:

The National Telecommunications and Information Administration on behalf of the Executive Branch Agencies, has approved the release of three Draft Executive Branch (NTIA) proposals considering federal agency inputs toward the development of U.S. Proposals for WRC-03. Your WRC Advisory Committee drafted the two proposals addressing agenda item 1.27 and 1.7.2. These proposals were approved by the RCS and reformatted in the WRC proposal format and included in the enclosure. The third proposal, drafted by the RCS, addresses agenda item 1.19.

The Executive Branch Agencies have also approved the release of two additional Preliminary Executive Branch (NTIA) Views considering federal agency inputs toward the development of U.S. Preliminary Views for WRC-03. The enclosure contains these preliminary views addressing WRC-03 agenda items 1.15c and 1.31c.

The new documents are forwarded for review by your WRC-03 Advisory Committee. Karl Nebbia from my staff will contact Julie Garcia and reconcile any differences in the proposals or preliminary views.

Sincerely,

(Signed 26 September 2001)
William T. Hatch
Associate Administrator
Office of Spectrum Management

Enclosure

United States of America**PROPOSALS FOR THE WORK OF THE CONFERENCE¹**

Agenda Item 1.27: to review, in accordance with Resolutions **540(WRC-2000)** and **735 (WRC-2000)**, the ITU-R studies requested in those resolutions, and modify, as appropriate, the relevant regulatory procedures and associated sharing criteria contained in Appendices **S30** and **S30A** and in the associated provisions;

USA/ /1
MOD

S5.491 *Additional allocation:* in Region 3, the band 12.2-12.5 GHz is also allocated to the fixed-satellite (space-to-Earth) service on a primary basis. The power flux-density limits in Article **S21**, Table **S21-4** shall apply to this frequency band. The introduction of the service in relation to the broadcasting-satellite service in Region 1 shall follow the procedures specified in Article **7** of Appendix **S30**~~7~~ ~~with the applicable frequency band extended to cover 12.2-12.5 GHz.~~

Reasons: WRC-2000 updated Article **7** of Appendix **S30** so that it now specifically includes 12.2-12.5 GHz. Consequently, the above deleted phrase is no longer needed.

¹ Ref. WAC/063(28.08.01)

United States of America

DRAFT PROPOSALS FOR THE WORK OF THE CONFERENCE ²

Agenda Item 1.7: to consider issues concerning the amateur and amateur-satellite services:

1.7.2 review of the provisions of Article **S19** concerning the formation of call signs in the amateur services in order to provide flexibility for administrations;

Background Information: Agenda item 1.7.2 was proposed to provide more flexibility in amateur station call sign structure, especially to commemorate special events or for special situations. There is some demand in the United States for amateur station call signs that do not conform to Article **S19**. On occasion the FCC has granted permission for amateur stations to use call signs that are at variance with Article **S19** to commemorate, for example, U.S. hosting of the Olympics and the bicentennial of the Constitution of the United States.

Proposal:

USA/ /2
MOD

S19.68 § 30 1)

- one character (see No. **S19.50.1**) and a single digit (other than 0 or 1), followed by a group of not more than ~~three letters~~ four characters, the last of which shall be a letter, or

Reasons: Greater flexibility would be afforded.

USA/ /3
SUP

S19.49

Reasons: This paragraph prohibits amateur station call signs commencing with a digit when the second character is the letter O or the letter I. This unnecessarily limits the call selections of administrations that are allocated such international call sign series. In the case of Yemen, which has been allocated only the international call sign series 7OA-7OZ, no amateur call sign can be formed that conforms to No. **S19.49**.

² Ref WAC/061(28.08.01)

United States of America

PROPOSALS FOR THE WORK OF THE CONFERENCE³

Agenda Item 1.19: to consider regulatory provisions to avoid misapplication of the non-GSO FSS single-entry limits in Article **S22** based on the results of ITU-R studies carried out in accordance with Resolution **135 (WRC-2000)**;

Background Information: WRC-2000 adopted, in Article **S22**, a combination of single-entry validation, operational and, for 3 and 10 meter antennas in the 10.7-12.75 GHz band, single-entry additional operational equivalent power flux-density (epfd) limits to be met by non-GSO FSS systems in order to protect GSO FSS and GSO BSS networks in parts of the frequency range 10.7-30 GHz. Misapplication of non-GSO FSS single-entry epfd limits could occur by artificially splitting or combining the number of transmit stations associated with a non-GSO FSS system. As stated in the CPM Report to WRC-2000, it was agreed that such misapplication would invalidate the entire basis of the derivation of the single-entry limits. Misapplication of these limits could:

- a) Cause excess interference into GSO networks;
- b) Reduce the number of non-GSO FSS systems that could be implemented in an allocated frequency band;
- c) Affect the regulatory requirements for a non-GSO FSS system in the ITU coordination notification process; and
- d) Affect non-GSO FSS systems that meet the single-entry limits in Article **S22**.

Resolution **135 (WRC-2000)** was adopted for the purpose of conducting technical studies and considering regulatory procedures, in time for consideration by WRC-03, to ensure that there will not be any misapplication of limits in Tables **S22-1** (epfd_↓), **S22-2** (epfd_↑), and **S22-3** (epfd_{is}) of Article **S22**. Further, Resolution **135** instructs the Director of the Radiocommunication Bureau to review and, if appropriate, revise as of the end of WRC-03, any finding previously made in respect of compliance with the limits contained in Article **S22** for a non-GSO FSS system, for which notification information has been received on or after 22 November 1997. The Bureau's review and revision of findings is to be based on the studies undertaken by the ITU-R pursuant to Resolution **135** after WRC-2000.

Proposal:

ARTICLE S22

Space services¹

USA/ /4

NOC

Section II – Control of interference to geostationary-satellite systems

Reasons: The current Radio Regulations are adequate. There have been no apparent cases involving potential misapplication of the single-entry epfd limits nor technical studies to support new regulatory procedures.

³ RCS – 1393_rev1

UNITED STATES
DRAFT PRELIMINARY VIEWS ON WRC-03

WRC-2003 Agenda Item 1.31c: to consider the additional allocations to the mobile-satellite service in the 1-3 GHz band, in accordance with **Resolutions 226 (WRC-2000)** and **227 (WRC-2000)**;

ISSUE: Additional allocations to MSS (Earth-to-space) in the 1- 3 GHz band

BACKGROUND: Resolutions **226** and **227** call for expanding the frequency bands to be examined for possible allocation to MSS in the event that the studies of the specific frequency band referred to in these resolutions (1 518-1 525 and 1 683-1 690 MHz - see additional preliminary views under agenda item 1.31) lead to an unsatisfactory conclusion. The ITU-R is to carry out sharing studies in order to recommend alternative MSS (Earth-to-space) frequency bands in the 1-3 GHz range, but excluding the band 1 559-1 610 MHz, for consideration at WRC-03. The Resolutions go on to state that the MSS allocations should be on a global basis, preferably in the vicinity of the existing MSS allocations around 1.5/1.6 GHz.

The need for additional spectrum for MSS is not well supported. Previous ITU-R conference preparatory documentation refers to a substantial unmet need for additional MSS spectrum. However, in light of recent developments where many MSS services have not had market success, it is questionable whether additional MSS is a high priority given other demands for spectrum in the 1 to 3 GHz range. No immediate need for additional MSS spectrum has been expressed in the United States. In fact the FCC is currently conducting a proceeding (ET-Docket-00-258) that may result in reducing the amount of MSS spectrum allocated in the 2 GHz bands.

The scope of the WRC agenda item might include consideration of any spectrum band between 1 and 3 GHz and so could affect many different spectrum interests. Only the 1 670-1 675 MHz band has been mentioned as an alternative. Internationally, this band was identified for aeronautical public correspondence by WARC-92 in RR **S5.380**. The band is included in the preliminary WRC-03 documentation from the responsible ITU-R study group, WP8D, as a possibility for a new MSS earth-to-space allocation. This band is also the subject of a current U.S. reallocation proposal in FCC Docket ET-00-221. In this rulemaking there was a proposal made for MSS uplinks but this was not acted on.

U.S. VIEW: No requirements for additional MSS allocations in the 1 to 3 GHz range have been identified. There are large demands by many other services for additional spectrum in this frequency range. The United States does not believe that the 1 670-1 675 MHz band will be suitable for MSS use for uplinks, nor has any corresponding downlink spectrum been identified. (September 15, 2001)

UNITED STATES
DRAFT PRELIMINARY VIEWS ON WRC-03

WRC-2003 Agenda Item 1.15c: to review the results of studies concerning the radionavigation-satellite service in accordance with Resolutions **604 (WRC-2000)**, **605 (WRC-2000)** and **606 (WRC-2000)**;

ISSUE: Resolution 604: To determine whether the provisional pfd of -171 dB (W/m²) is the appropriate value.

BACKGROUND: WRC-2000 introduced new space-to-space and space-to-Earth allocations to the RNSS in the band 5 010-5 030 MHz. In order to protect radio astronomy from detrimental interference, RR **S5.443B** includes a provisional aggregate pfd value of -171 dB (W/m²) in a 10 MHz bandwidth at any RA observatory site that cannot be exceeded for more than 2% of the time in the band 4 990-5 000 MHz. Under Resolution **604 (WRC-2000)**, the ITU-R is to review the provisional limit.

ITU-R Working Party 8D is the lead group addressing this issue and developing Conference Preparatory Meeting text. Working Party 7D has confirmed that the value of -171 dB(W/m²) is the necessary value and is considering a methodology for computing the aggregate level, as well as, how to address the time during which the pfd can be exceeded taking into account the characteristics of the radio astronomy antenna.

U.S. VIEW (Resolution 604): The United States believes that the pfd value of -171 dB(W/m²) is the appropriate level. The United States continues to study the regulatory aspects of use of an aggregate protection level. At the same time, the United States is concerned about extensive requirements that might be placed on the ITU Radio Bureau to implement processes to verify that such pfd's are not exceeded. In addition, the use of allocation provisions (footnotes) in one frequency band that specify protection levels for services operating in a different band should be limited to particular cases where such protection is not obtainable otherwise. In this instance the allocation table has been modified to add allocations where there is a high probability that interference may result from the operation of the new systems unless special measures are taken. In other cases the normal provisions of the Radio Regulations are sufficient to ensure compatibility of use. (September 15, 2001)
