

**Comments of IWG-1 on Draft U.S. Proposal from Exec. Branch Agencies on
WRC-07 Agenda Item 1.20**

IWG-1 has considered the terrestrial elements of the draft U.S. proposal for WRC-07 Agenda Item 1.20 from the Executive Branch agencies. It offers the following comments:

1. IWG-1 observes that it is premature for the United States to assert, in the background or in the reasons for any specific proposal, that values proposed for the protection of the EESS (passive) are based on an assessment of the impact on the relevant active service. To the extent that any ITU-R studies have even considered the impact on the active service involved – a requirement of both Resolution 738 (WRC-03) and the agenda item – no conclusions have yet been reached, which calls into question the proposals for specific levels at this time. The terrestrial industry is continuing to address this question with respect to the operation of stations in the 1350-1400 MHz, 1427-1452 MHz, 31-31.3 GHz and 51.4-52.6 GHz bands.
2. IWG-1 is concerned with the proposal for mandatory limits on fixed service station emissions into adjacent bands. For protection against unacceptable interference caused by unwanted emissions, mandatory limits may be without precedent in the RRs. The language in the Exec. Branch agencies' proposals for new footnotes (including 5.AAA, 5.CCC, and 5.EEE) would appear to invite BR examination under Art. 11 of compliance with unwanted emission limits. Even if BR examination is not what the Exec. Branch agencies contemplate, the mandatory nature of the wording does not clearly exclude examination, and has serious negative implications for the operation and evolution of advanced services in the affected active service bands. In Document WAC/096, a redline of the Exec. Branch agencies' proposal for Agenda Item 1.20, IWG-1 offers suggestions for the wording of the proposed footnotes that aligns the notes generally with the approach taken by WRC-03 with respect to protection of the radioastronomy service from detrimental interference (see Resolution 739 (WRC-03)), and removes any suggestion that the footnotes would require BR examination.
3. IWG-1 concurs with proposals USA/ /3, 5, 7 and 13.