

**Comments of IWG-2 on Draft U.S. Proposal from Exec. Branch Agencies on  
WRC-07 Agenda Item 1.20 (Document IWG-2/057)**

IWG-2 has considered the satellite elements of Document IWG-2/057, which contains draft U.S. proposal for WRC-07 Agenda Item 1.20 from the Executive Branch agencies. It offers the following comments:

1. IWG-2 endorses the NOC proposals for the bands 22.55-23.55 GHz and 30-31 GHz (inter-satellite service and fixed-satellite service (Earth-to-space), respectively) that are contained in Proposals USA/ /5 and USA/ /7.
2. IWG-2 also endorses the SUP proposal for Resolution 738 that is contained in Proposal USA/ /13.
3. IWG-2 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. The FSS industry is continuing to address this question with respect to the operation of earth stations in the 47.2-50.2 GHz FSS (Earth-to-space) band.
4. IWG-2 is concerned with the proposal for mandatory limits on FSS earth 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.BBB, 5.DDD, 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 (Doc. IWG-2/057), IWG-2 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 subject FSS and space operations earth stations to BR examination. The language of the alternative text was coordinated with IWG-1, which has responsibility for the terrestrial service elements.
5. With respect to the proposal for an unwanted emission value for FSS earth stations operating in the 47.2-50.2 GHz band (proposed note 5.DDD in Proposal USA/ /10), it appears that the derivation of the 30 dBW/200 MHz level that is stated as needed to protect the EESS (passive) from unwanted emissions into the 50.2-50.4 GHz band may have been based on unrealistic

assumptions regarding FSS deployment and parameters. Furthermore, it should be emphasized in the proposal that the protection level is a clear-sky level, and that FSS earth stations in the 47.2-50.2 GHz band can increase their transmit power density by TBD dB, to overcome fading conditions without causing additional impact to the EESS (passive) systems. IWG-2 emphasizes that it has no difficulty with the concept of identifying an unwanted emission level that would protect the EESS (passive) service in that band; at this time, however, that level remains under discussion between interested representatives from both the active service and passive service communities.

6. There is an inconsistency between the language of No. 5.DDD in Proposal USA/ /10 and the proposed modification to Article 5 in Proposal USA/ /9. The former indicates that the note is to apply only to the 49.44-50.2 GHz portion of the 47.2-50.2 GHz band in Region 1, while the latter applies No. 5.DDD to the entire 47.2-50.2 GHz band. IWG-2 recommends that this discrepancy be resolved, but as long as No. 5.DDD reflects a satisfactory resolution of the matter addressed in Comment No. 4 above, IWG-2 takes no position on how this discrepancy should be resolved.