

WRC-2003 Advisory Committee

IWG-2/IWG-3

Comments on NTIA Draft U.S. Proposal on WRC-03 Agenda Item 1.8.2 (Document WAC/173)

IWG-2 and IWG-3 have reviewed the draft proposal for WRC-03 Agenda Item 1.8.2 from NTIA (Document WAC-173, dated December 19, 2002). IWG-2 and IWG-3 offer the following comments on the NTIA draft proposal:

1. The NTIA draft proposal takes a significantly different approach to Agenda Item 1.8.2 and the subject of unwanted emissions than the approach the WAC recommended to the Commission in Document WAC/109 in June 2002. The participants in IWG-2 and IWG-3 stand behind the approach they took in Document WAC/109, and believe that the WAC approach is the preferred method to satisfy Agenda Item 1.8.2.
2. The CPM Report to WRC-03, in Section 6.1.2, contains four methods to satisfy Agenda Item 1.8.2, and one of these methods includes three options. The draft proposal in Document WAC/109 from IWGs 2 and 3 directly reflects Method C in Section 6.1.2.3.3 of the CPM Report. By contrast, the NTIA draft proposal in Document WAC/173 is a completely new method that has not been addressed in the ITU-R. In fact, the NTIA draft proposal, unlike all of the other methods in the CPM Report, does not account for or even acknowledge the results of studies that are reflected in Draft New Recommendation ITU-R SM.[BbB] from Task Group 1/7.
3. The NTIA draft proposal in Document WAC/173 introduces new and potentially difficult concepts. For example, it calls upon future WRCs generally to avoid making allocations in the space-to-Earth direction to space services in bands that “are adjacent to or nearby frequency bands allocated to” the radio astronomy service and the EESS (passive) services. The terminology used is new and vague; it may be perceived within the ITU as offensive for the U.S. to suggest that future allocations could be made without taking into account the impact of such allocations on existing services (whether in the same or adjacent bands); and there is a difficulty in principle with having WRC-03 direct the handling of matters by future conferences in perpetuity.
4. The NTIA draft proposal in Document WAC/173 calls for further studies on how radio astronomy and EESS (passive) services are to be protected from space services’ unwanted emissions. Three difficulties seen here are: a) that the proposal ignores DNR ITU-R SM.[BbB] and the results included there; b) that it implicitly calls for a continuation of Task Group 1/7 (perhaps through a successor group); and c) that it does not contain any provision that would call for examination of what measures the “victim” services can and should be taking to reduce their respective susceptibility to interference caused by unwanted emissions.

In summary, and for the reasons identified above, IWG-2 and IWG-3 do not endorse the approach proposed by NTIA in Document WAC/173, and urge the approval of Document WAC/109 as the U.S. proposal for WRC-03 Agenda Item 1.8.2.