

AAR	APCO
ARRL	ITA
AASHTO	ITSA
API	NAB
ATA	PCIA
AMSAT	FIT
FCCA	UTC
DOD [added]	

IWG-2A/#107

13 February 1997

Arguments in Opposition to NVNG Allocations Across Entire Band Below 1 GHz

In Document IWG-2A/86 (Rev. 5), proponents of additional spectrum for NVNG MSS below 1 GHz ("Little LEO") advocate that the U.S. propose at WRC-97 to allocate hundreds of MHz of spectrum between 135 and 806 MHz for mobile-satellite services. According to the Little LEOs, such broad allocations "will give administrations the flexibility to change their domestic allocation tables and decide on individual assignments/licenses in smaller portions of larger bandwidth international allocations." See IWG-2A/86 (Rev. 5) at 5.

The frequency bands targeted by Little LEOs are now occupied by millions of users in the U.S. Those potentially affected include terrestrial land mobile systems operated by the Federal government and US military as well as private industrial and public safety agencies. Other potentially affected users include television broadcasters and amateur radio operators. It is estimated that, over the years, the potentially affected users have invested hundreds of billions of dollars in their radio networks and infrastructure.

The signatories to this paper (see attached legend) oppose the broad allocation approach presented by the Little LEOs. Never before has the U.S. -- or any other country -- submitted such an open-ended allocation proposal. Contrary to the assertions in Document IWG-2A/86, obtaining broad allocations of hundreds of MHz of spectrum below 1 GHz, then attempting to conform such allocations on a country-by-country or regional basis would be totally new and unprecedented. Broad allocations that have been created before -- for example, to the mobile services below 1 GHz -- were done at a time when the spectrum allocated was at or above the level of then-current technology, and thus the allocation was both essentially vacant and required new manufacturing techniques. By contrast, the Little LEO proponents advocate a broad allocation that overlays generations of prior allocations that are used for assignments for existing and useful services. The Little LEO proposal is much more difficult; it will imperil communications for millions of existing users and endanger the infrastructure investment mentioned above.

As has previously been noted (see Land Mobile objections to the proposed allocation at 450-470 MHz attached to the IWG-2A report to the IAC; IWG-2A/101), there are numerous reasons to believe that the Little LEO approach will not succeed. First, the Little LEO proponents appear to favor an allocation technique that avoids the necessity to perform studies of frequency sharing. In so doing, they seek to avoid the express request of WRC-95 (Resolution 214) to conduct frequency sharing studies as a precondition to additional allocations at the next WRC. (The Little LEO interests have conducted virtually no studies to justify the sharing they now propose, and what few studies are available actually prove that sharing is not feasible.) Absent such a study or studies, it will be all the more difficult to persuade a majority of nations to support the Little LEO proposal.

Second, the Little LEO approach is inconsistent with decades of ITU practice. Traditionally, types of services are given specific allocations, not broad general direction to use the entire table of allocations. Such a dramatically new approach would be controversial and a political liability among other nations at the WRC. Indeed, this plan would, essentially, promise that the private sector Little LEO operators will not use the band where infeasible -- a promise that other governments may not view as credible or enforceable. For the U.S. to place its credibility and stature behind this proposal would undercut other important U.S. positions at the conference.

Third, the MSS plan would dramatically alter the international frequency allocation process in a manner that would not be in U.S. interests. By requesting broad international allocations, which would be implemented differently in each country (uplink) or region (downlink), the Little LEOs essentially would delegate the international frequency allocation responsibility to national licensing and coordination requests on a country-by-country basis. This would render the international allocation table meaningless. The result likely would be international chaos and confusion; an entity would have to hire frequency manager experts just to discern what allocations were available in what country.

In recent years, the U.S. has made substantial progress in obtaining global -- yet narrowly focused -- allocations for services in which U.S. companies can take leadership positions on a worldwide basis. This is particularly true regarding mobile satellites. The Little LEO "broad allocation" approach could vitiate this success, and make it more difficult for the next generation of U.S. initiatives to achieve international acceptance. For the foregoing reasons, the sponsors of this paper recommend that the U.S. not adopt the Little LEO "broad allocation" approach as a position for the WRC-97.

Attachment (Sponsor Legend)

SPONSORS (Broad Allocation Paper)

MR	Association of American Railroads
ARRL	American Radio Relay League (Amateur Radio Operators)
AASHTO	American Association of State Highway and Transportation Officials
AMSAT	Radio Amateur Satellite Corp.
APCO	Association of Public Safety Communications Officers
API	American Petroleum Institute
ATA	American Trucking Association
FIT	Forest Industries Telecommunications
FCCA	Forestry-Conservation Communications Association
ITA	Industrial Telecommunications Association
ITSA	Intelligent Transportation Society of America
NAB	National Association of Broadcasters
PCIA	Personal Communications Industry Association
UTC	UTC, The Telecommunications Association (Utilities)
DOD	Department of Defense [added]