

CPG19-9**Ankara, Turkey, 26th - 30th August 2019****Date issued: 14th August 2019****Source: International Amateur Radio Union (IARU)****Subject: RNSS Proposal WRC-19 AI 10**

Group membership required to read? (Y/N)

N

Summary:

For WRC-19 AI 10, a WRC-23 AI proposal was made to CPG PTA-7 for the RNSS and Amateur Service in the range 1240-1300 MHz. However it was not supported by the meeting and therefore it is not included in the draft ECP for WRC-19 AI10 PTA(19)105 Annex V-24. However, IARU understands that a further proposal on this topic may be made at the final CPG meeting.

The proposal is driven by a small number of interference cases that have occurred between the amateur service and the Galileo control centres in Oberpfaffenofen (DE) and Fucino (IT) reported in CPG PTA. These have been satisfactorily resolved and action is underway in CEPT (WGFM and WGSE) to develop further guidance so that future cases can be avoided as the Galileo system rolls out. IARU fully supports this initiative in CEPT. In the range 1240-1300 MHz the Amateur Service is already a secondary service in the ITU-R Radio Regulations and is therefore already bound to not cause interference to the primary services.

IARU understands that it is not the intention of the proposers to seek removal of the amateur service allocation in this range. It is an important band for the amateur service offering an entry point to the higher microwave frequencies encouraging new engineers to explore the possibilities for radio communications in these bands. However, IARU is concerned that any WRC action could lead to unintended outcomes that would be detrimental to the amateur service globally and that such action is unjustified at this time.

IARU continues to request that administrations do not support a proposal for a WRC-23 agenda item concerning the 1240-1300 MHz frequency band.

Proposal:

to CPG19-9 to:

- take into account the position and concerns of the amateur service community and not propose a WRC-23 AI on this topic.
- allow CEPT activities to continue and focus on dealing with the specific issue of protecting Galileo E6 signal reception, and
- note that IARU fully supports this CEPT initiative and shall develop procedures guided by CEPT, so that future cases of interference can be avoided as the Galileo system rolls out.

Background:

The International Amateur Radio Union (IARU) represents the interests of amateur radio experimenters and operators worldwide. Amateur radio provides the possibility for people of all ages, gender and nationalities to gain practical hands on experience through the nationally regulated use of radio spectrum for the study and understanding of terrestrial and space wireless communications. Indeed many radio amateurs who

experienced amateur radio communications in their youth have used the skills gained for their technical and/or scientific careers in later life. (See: <https://www.iaru-r1.org/index.php/web-links-sp-999616743>).

Previous contributions to CPG and interventions in PTA have laid out the concerns of the amateur community with the WRC-23 agenda item proposal. A summary of IARU views is that:

- 1 Although two interference cases have been well documented and investigated, others seem somewhat anecdotal. For example and despite enquiries IARU has not been able to find any information relating to the Italian "moonbounce" example cited by the European Commission representatives and by France. As a result this interference scenario cannot be studied in sufficient detail.
- 2 The few reported interference cases have occurred to a Galileo control centre and not to end user devices, which will operate in a more cluttered terrestrial propagation environment. IARU believes that the possibility for widespread interference to end user devices from the most common amateur applications is over stated and is extremely unlikely to occur, given the directional nature of amateur transmissions and the deployment scenario envisaged for the Galileo devices (again in a more cluttered environment and generally "looking up" towards the satellite constellation) .
- 3 Despite the interesting laboratory measurement campaigns, which the amateur service supported, there are still no firm service failure criteria in place to understand the point at which Galileo receivers (either individually or as a network/community) will fail to provide a useful service to the end user when receiving interference.
- 4 Some parties cite the potential for an "administrative burden" resulting from interference cases. IARU believes this is also over stated. There are examples where national licences stipulate operational constraints on the amateur service (geographic, time of operation etc.) and these are easily administered without any undue burden. The amateur service has always collaborated on any such issues, has respected any such restrictions and will continue to do so, including amending its band plans if the studies in CEPT conclude that this is required.
- 5 IARU believes that the preliminary measurement studies presented in PTA warrant more detailed consideration and already offer the potential for developing opportunities for inter-service coexistence that does not warrant WRC action.