

International Amateur Radio Union Region 1

Europe, Middle East, Africa and Northern Asia Founded 1950
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The 23cm Band is under scrutiny

The EU Galileo "sat-nav" team and European CEPT regulators have imposed a global study programme to consider new regulations that are likely to constrain amateur and amateur satellite operations in the 23cm band. The constraints could include, reductions in power, antenna limitations or reductions in the band available especially for wider bandwidth applications (e.g.DATV).

As <u>reported in December 2020</u>,¹ IARU is deeply involved in the discussions in ITU and CEPT, providing studies and representing the views of the amateur service generally. This work is ongoing and updates will be provided from time to time.

IARU believes that operational experience suggests that widespread disruption to any satnav services from amateur transmissions is very unlikely and that it is now time for local and national amateur communities to step up and make their voices heard in the discussion.

Please would Member Societies read the following from the Chair of our Spectrum and Regulatory Liaison Committee carefully and take action as requested.

73, Don Beattie, G3BJ

President

Dear Member Society,

As you may know the 23cm band (1240-1300MHz) is the subject of technical studies in both CEPT and in ITU-R. These studies will continue throughout 2021/22 up to the WRC in 2023 (and possibly beyond) and are likely to result in some technical and operational constraints being considered for amateur activities in the band. The Radio Navigation Satellite Service (RNSS) wants these, to protect them as a primary service operating across the band. The systems operating within the range 1240-1300 MHz include the European GALILEO system, the Russian GLONASS system, the Chinese COMPASS system and potential new systems from Korea. Globally, the regulatory community has reported only two cases of interference that have been dealt with in one country.

These RNSS systems are backed by huge investments from governments and multi-national industry players.

¹ https://www.iaru-r1.org/2020/iaru-is-fully-engaged-in-the-23cm-band-galileo-radio-navigation-satellite-service-coexistence-studies-in-cept/

Early Reactions

Unfortunately, the IARU is aware that some national regulators are already reacting to this matter by restricting amateur access or even removing the band from the amateur licences in their country. This is happening despite the unfinished and immature status of the technical studies which are currently at an early stage and it may be the result of early political or commercial lobbying by some RNSS proponents.

IARU Engagement

The IARU is fully engaged in the studies in all the relevant fora (both regionally and internationally) and has been promoting a view that the potential for interference is being overstated. We now need everyone to continually express this view and to explain to **national** regulators the importance of the band to the amateur service everywhere. IARU cannot do this – it is for member societies to speak with their regulators.

National Support needed

This letter is now a <u>call to action</u> for the member societies to act now to ensure that their respective licensing authorities and regulatory bodies are fully aware of the importance of this band to the development of the amateur services. We need to ensure that they clearly hear the voice of their local amateur stakeholders as the work progresses and therefore have no doubt about the views in their country.

To help you in speaking with your regulator, you will find a set of discussion points attached that underpin the IARU views and should be used as a basis for your national discussion. It is vital that the message from the amateur community remains consistent.

Global Issue

Although this may look to be a "CEPT/Region 1 issue" this is not the case. The RNSS community seeks to have any technical constraints and measures that may result from the studies applied **globally** through inclusion in the ITU-R Radio Regulations. Therefore the call to action is equally applicable to the member societies in Regions 2 and 3.

What am I asking you to do?

Speak with your spectrum regulator and confirm in writing your concerns about the 1296 MHz band, using your own interpretation of the attached discussion points. To avoid confusion, please do not deviate from the IARU agreed preliminary position.

When you have done that, please feed back to me a summary of the discussion so that we know what the regulator's position is.

73,

Barry Lewis, G4SJH

Chair, IARU Region 1 Spectrum & Regulatory Liaison Committee

Attachment 1

IARU Agreed Preliminary IARU position on WRC-23 Agenda Item 9.1 Topic B (Feb 2021)

During many years of operational experience, the secondary amateur and amateur satellite services have successfully co-existed with all the primary services in the range 1 240-1 300 MHz with very few issues. In cases where certain applications (in particular wide bandwidth, high duty cycle applications) could increase the potential for interference, careful spectrum management and national licensing conditions have minimised any risk. Radio amateurs have successfully co-existed and innovated in this frequency range for many years and IARU believes that the regulatory status of the amateur and amateur satellite services in this range is already clear. Therefore any additional regulatory, operational or technical measures incorporated into the Radio Regulations are unnecessary. Any recommendations resulting from studies under Resolution 774 can be applied on a national basis and should be based on realistic assumptions, proportionate in scope and carefully justified so as not to unnecessarily inhibit development of the amateur services.

Supporting Discussion points

- <u>Secondary allocation:</u> The secondary status of the amateur and amateur satellite service allocations and the responsibilities of a secondary service are already clear in Article 5 Section II of the Radio Regulations. This should provide adequate assurance to primary services, without needing further action.
- <u>Long term coexistence:</u> In keeping with the status of the allocations, careful national coordination with primary service users has facilitated coexistence with the amateur services for many years without difficulty.
- <u>National authorisations regulate the service:</u> All amateur service operation is subject to national authorisation conditions. These conditions define any operational constraints such as transmitter power limitations or geographical operation limitations etc and can regulate any local issues with the RNSS services.
- A varied and evolving set of applications with varied characteristics are deployed: A wide range of amateur service applications are deployed, and experimental activities are undertaken in the 1240-1300 MHz band ranging from propagation experiments and voice communications to more complex technology experimentation with television and data transmissions.
- <u>An experimental and learning resource:</u> This is a key aspect of amateur service operation in this band which must be maintained for the services to develop.
- <u>A tiny number of confirmed interference cases in just one country:</u> Only two cases of unacceptable interference that required intervention from an administration in just one country are known to have occurred. These were both related to a high duty cycle amateur service transmitting stations and local enforcement action resolved the matter successfully for all parties.
- Low probability of interference from "personal" stations into any primary service user: A review of published activity data has confirmed that amateur service user density and activity factors for "personal" stations (meaning a manned station operated from home or a temporary outdoor environment) are extremely low suggesting a very low probability of interference which might disrupt RNSS services.

- Some applications (unmanned repeater stations) may have the potential for higher duty cycle transmissions: It is recognised that the higher activity factor and wide bandwidth associated with certain applications could be a source of longer term interference to a nearby RNSS service user.
- <u>Careful spectrum management at a national level can minimise the possibility of interference where this might be considered an issue:</u> This can be achieved through local knowledge and careful coordination. There are examples of this already in the relationship between the amateur service users and national administrations.
- <u>Any measures resulting from studies must be proportionate:</u> They must reflect the realistic potential for interference so as to avoid unnecessarily preventing the continued achievement of the objectives of the amateur services in a band where the amateur service has been an incumbent for more than 70 years.

Additional resources are updated in the web page dedicated to this topic at
