



ARRL The national association for AMATEUR RADIO™

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Mr. S. Decker Anstrom
Head of United States Delegation to WRC-12
United States Department of State
2201 C St NW
Washington DC 20520

May 26, 2011

Dear Mr. Anstrom:

ARRL appreciates the opportunity to participate in United States preparations for WRC-12. We are particularly appreciative of the leadership of the United States in the substantive work on agenda item 1.23. After thorough discussions in which private sector and government inputs were considered, the United States proposed to satisfy the agenda item with two secondary allocations at 461-469 and 471-478 kHz. This proposal has attained CITEL Inter American Proposal status with the support of ten other administrations.

Nevertheless, we are concerned by the United States proposal on agenda item 1.15, considering allocations for oceanographic radars. We are particularly concerned by what we perceive as a lack of opportunity for ARRL to participate in the process by which this proposal was adopted. Our specific concern is the proposal to allocate 5250-5450 kHz to the radiolocation service on a primary basis.

As of May 25, 341,448 of the 698,513 United States Amateur Radio licensees hold operating privileges on five discrete channels within the range 5250-5450 kHz (47 C.F.R. §§ 2.106 n.US381, 97.303(s)). Similar domestic allocations have been made in several other countries. The final report of the Conference Preparatory Meeting notes that "Sharing with amateur, broadcasting, and radio astronomy services seems to be difficult due to their protection requirements." This finding is consistent with earlier United States contributions to the ITU-R Working Party responsible for agenda item 1.15.

ARRL participated in the work of the FCC's WRC-12 Advisory Committee (WAC). The WAC adopted a proposal initiated by HF radar manufacturer CODAR that did not include 5250-5450 kHz. ARRL had no reason to oppose CODAR's proposal and did not do so. It appears the suggestion to allocate 5250-5450 kHz was initially made in an NTIA proposal dated February 28, 2011. NTIA proposals have ordinarily been released in due course by the NTIA and transmitted to the FCC's International Bureau for circulation to and review by the WAC. Had the NTIA proposal been circulated to the WAC before its final meeting on April 19, 2011, ARRL would have stated its reservation and reason at that time, prior to the adoption of a reconciled United States proposal on May 9. While the WAC did have to end its deliberations at some point, post-WAC consideration of proposals should provide notice to affected United States private sector stakeholders and an opportunity to be heard.

We would appreciate the opportunity to contribute to improving the proposal through appropriate domestic processes in advance of its submission to the ITU.

Sincerely,

Kay C. Craigie
President

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