

# Comments to the DSI Phase III Workshop in Copenhagen on September 22nd 1999

Addressed to ERO (EU) and RegTP (D)

Dr. Ralph P. Schorn

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## Amateur Radio Service

The amateur radio service shares the following secondary allocations with other services within the range 862–3400 MHz in the Radio Regulations and in the European Common Allocation Table (ECA):

- 1240–1260 MHz : Amateur (secondary)
- 1260–1270 MHz : Amateur (secondary) / Amateur Satellite E/S (Secondary - S5.282)
- 1270–1300 MHz : Amateur (secondary)
  
- 2300–2400 MHz : Amateur (secondary)
- 2400–2450 MHz : Amateur (secondary) / Amateur Satellite (Secondary - S5.282)

## Recommendation (ERO-Workshop September 22nd 1999)

### It is recommended (by ERO)

- 20.1 that in connection with planning for future WRCs a European proposal should be developed to allow the amateur satellite service in the band 1260-1270 to operate also in the Space to Earth direction in accordance with footnote S5.282

## Comments by AGZ e.V.

We strongly appreciate the intended ERO recommendation to allow the amateur radio satellite service to operate in the space-to-earth-direction within the subband 1260–1270 MHz, as this gives more flexibility to innovative projects being planned and performed in this context. We encourage ERO to submit this recommendation to a future WRC as a European proposal.

On the other hand, we deeply regret that ERO does up to now not even consider to upgrade a single subband of an amateur service allocation to a primary status within DSI Phase III. We in contrast see a crucial necessity for primary amateur service allocations for several reasons:

- The frequency range under discussion in DSI Phase III offers optimal propagation properties for mobile applications, for digital cellular network structures, and for the distribution of digital video information. Frequencies below 862 MHz do not allow for the necessary bandwidths and show up with too wide coverage areas. Frequencies above 3400 MHz have unfavourable propagation features, such as quasi-optical propagation and severe multipath interference, and they comprise considerably smaller coverage areas with the need to install much more hardware equipment.

- The primary users of the amateur segments within DSI Phase III more and more employ these frequencies on a broad temporal and territorial scale, especially concerning 2320–2450 MHz with Electronic News Gathering (ENG) as well as Outside Broadcasting (OB) and Short Range Devices (SRD). Also, 1240–1300 MHz is affected by growing use of military and civil services concerning radionavigation and radiolocation applications. Thus, amateur radio applications are hindered from expansion. Furthermore, even established applications are more and more threatened by this ongoing development. Extensively and comprehensively used primary band segments do not allow for a serious co-existence with amateur radio.
- The amateur radio service, as being a technologically and scientifically oriented service by legal definition (see ITU Radio Regulations and the resp. national laws), must be granted the necessary frequency space and the necessary utilisation status in order to comply with this demand.
- To justify its spectrum allocations, the amateur radio service must engage in current topical technologies such as digital video broadcasting, cellular digital networks, and spread spectrum protocols. To comply with this, a mandatory long term planning perspective must be given by the legal bodies (such as ITU/WRC and the national authorities) within the suited spectral segments.
- There is not even a single primary amateur radio allocation between 440 MHz and 24 GHz.

AGZ e.V. therefore recommends to upgrade the following subbands to a primary status for the amateur radio service, to be used on an equal rights basis with other services:

- 1240 – 1244 MHz
- 1270 – 1300 MHz
- 2390 – 2417 MHz.

We ask ERO to submit this recommendation to a forthcoming WRC as a European proposal.

For AGZ e.V.:

Dr. Ralph P. Schorn, DC5JQ

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