UNITED STATES DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Washington, D.C. 20230

NOV 22 2002

Mr. Donald Abelson
Chief of the International Bureau
Federal Communications Commission
445 12th Street SW
Washington, D.C. 20554

Dear Mr. Abelson:

The National Telecommunications and Information Administration (NTIA), on behalf of the Executive Branch Agencies, has approved the release an additional draft Executive Branch proposal for WRC-03. This proposal considers the federal agency inputs toward the development of U.S. Proposals for WRC-03.

The enclosed proposal addresses agenda item 1.20, which looks at non-GSO MSS allocations with service links operating below 1 GHz. NTIA is proposing, no change (NOC), to the current allocation table and the suppression of Resolution **214**. This proposal is forwarded for your consideration and review by your WRC-03 Advisory Committee. Jim Vorhies from my staff will contact Alexander Roytblat and reconcile any differences between the NTIA and FCC views.

Sincerely,

Fredrick R. Wentland
Acting Associate Administrator
Office of Spectrum Management

Enclosure

United States of America

DRAFT PROPOSAL FOR THE WORK OF THE CONFERENCE

Agenda Item 1.20: to consider additional allocations on a worldwide basis for the non-GSO MSS with service links operating below 1 GHz, in accordance with Resolution **214 (Rev.WRC-2000)**;

Background Information: A total of 1.525 MHz (space-to-Earth) and 1.9 MHz (Earth-to-space) are presently allocated on a worldwide primary basis to the mobile satellite service (MSS) below 1 GHz and 300 kHz (Earth-to-space) is allocated for land MSS on a worldwide primary basis. An additional 151.5 MHz may be used subject to the agreement obtained under No. **9.21**. In addition, 2 MHz (Earth-to-space) in Region 2 is allocated to the MSS below 1 GHz. Some individual countries have additional allocations (Earth-to-space) for the MSS below 1 GHz appearing in footnotes. These allocations are for both the MSS service links and feeder links.

During WRC-03 preparation, no evidence of spectrum congestion of MSS service links below 1 GHz was provided to the ITU-R. The 7-10 MHz requirement identified in the CPM-95 Report assumed six million users of the little LEO service by the year 2000. In actuality, the service did not have 100,000 users in 2002. That report has been overtaken by events and it should not be relied-upon.

Finally, the study done for CPM-95 indicated 500,000 users could be served in one MHz of spectrum. In a study for CPM-97, it was assumed that 3.2 million users could be served in the same one MHz. With 1.9 MHz of uplink spectrum, this means that 6.08 million users could be supported in the current allocations. The downlink calculation is 6.1 million users per MHz with 1.525 MHz of allocated spectrum can support 9.3 million customers.

Regarding Resolution **214**, requirements studies to show current need have not been done. Resolves 2 of Resolution **214** states, "that WRC-03 be invited to consider, on the basis of the results of the studies conducted within ITU-R and the studies referred to in *resolves* 1 above, additional allocations on a worldwide basis for the non-GSO MSS below 1 GHz." There are no studies for additional allocations for WRC-03 to consider. Retaining the resolution is not warranted given the status of the LEO below 1 GHz market.

Proposal:

USA/ /1 **NOC**

Article 5

Frequency Allocations

Reasons: Given the demonstrated slow growth of subscribers of MSS below 1 GHz, the future growth of traffic could be accommodated in the existing frequency bands without a requirement for an additional allocation.

USA/ /2 SUP

RESOLUTION 214 (WRC-2000)

Reasons: Requirements studies to show the existing or future need exceeds the current allocations have not been done and with no new allocations needed, the Resolution should be suppressed.