

## Comments on ECC Deliverable ECC/DEC/(11)HH

“Draft new ECC/DEC/(11)HH on harmonised frequency arrangements for mobile/fixed communications networks (MFCN) (including IMT) operating in the bands 3400-3600 MHz and 3600-3800 MHz”

### 0 Sources

#### Administration/Company/Entity:

- **International Amateur Radio Union (IARU) Region-1**
- Registered at the Swiss Association Register, Chamber of Commerce, c/o Baer-Nutz-AG, Scheuermattstrasse 8A, CH-6330 Cham ZG, File No. CH660.0.019.990-1

#### Name and Appointment of contributor:

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### 1 General Comments

Within the frequency range covered by this draft decision the Amateur Services are keen to harmonise and protect their own activities, particularly within the band 3400-3410MHz which we have historically shared with Primary governmental entities/services.

In CEPT this Amateur Service use is recognised and allocated by European Common Frequency Allocation Table Footnote EU17, which is current not referenced by the draft decision:

"In the sub-bands **3400-3410MHz**, 5660-5670MHz, 10.36-10.37GHz, 10.45-10.46GHz the amateur service operates on a secondary basis. In making assignments to other services, **CEPT administrations are requested wherever possible to maintain these sub-bands in such a way as to facilitate the reception of amateur emissions with minimal power flux densities.**"

Furthermore because of the current Primary usage (eg by Radiolocation etc) It is well established and recognised by amongst other things ECC REC (04)05 that 3400-3410 is not generally available for high density commercial wireless systems

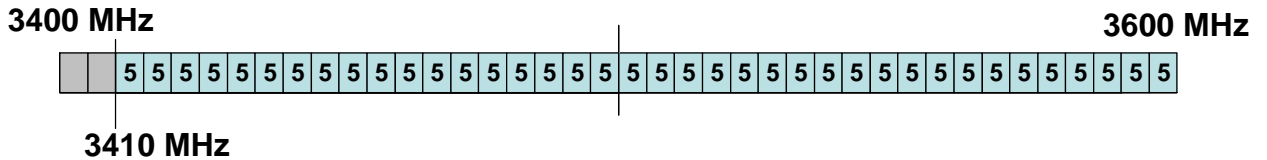
Therefore unless the TDD band plan is modified we are of the view that the FDD band plan is more compatible with existing services.

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## 2 Proposals related to the ECC Deliverable

Following from our general comments above, with respect to the consultation we are:

- a) Comfortable with the FDD Frequency plan in Annex-2 as it starts from 3410MHz upwards
- b) Have considerable concern with the current TDD frequency plan in Annex-1 which starts at 3400MHz and propose it is modified to:-



- c) Keen that the Considering (n) should also explicitly include the Amateur Service as a user of 3400-3410MHz (inc EU17)
- d) Have the view that Considering (hh) regarding TDD is insufficient, unless existing 3400-3410 usage is explicitly recognised
- e) That unless some modification is made, that neither Option-A or Option-B in Decides(2) directly address the concerns above in the current draft decision

We note that one other advantage of more explicitly recognising 3400-3410 usage by existing services and more consistently treating this range would be that:-

- The equality / neutrality between the FDD and TDD options would be improved;
- Better guidance for harmonised use by both MFCN in 3410+, as well as existing services in 3400-3410 MHz would result.