



March 4, 2015

Representative Doris O. Matsui
 Representative Brett Guthrie
 Representative Anna G. Eshoo
 Representative Robert E. Latta
 Senator Cory A. Booker
 Senator Marco Rubio

Honorable Ladies and Gentlemen:

On behalf of more than 700,000 licensed radio amateurs in the United States, including 160,000 members of the ARRL, I am writing to bring to your attention important information that may not have been in your possession before your letter concerning 10 GHz sharing was sent to FCC Chairman Wheeler on March 2.

As important as wireless broadband may be, the 10 GHz band is an unsuitable choice for expansion. The band, specifically 10.0-10.5 GHz, is already shared by federal and licensed non-federal radio-communication services. Based on extensive compatibility studies conducted during preparations for the 2015 World Radiocommunication Conference (WRC-15), additional sharing for an important scientific purpose is already planned.

The primary occupant of the band is the federal radiolocation service. The ARRL understands that federal use is extensive and largely airborne, which makes sharing with high-density wireless broadband impossible. The principal non-federal services to which the band is allocated are the amateur service (10.0-10.5 GHz) and the amateur-satellite service (10.45-10.5 GHz). The non-federal radiolocation service is permitted to use the band provided that no harmful interference is caused to the Federal radiolocation service, the amateur service, or the amateur-satellite service. There is also an allocation to the meteorological-satellite service that overlaps the low end of the band.

Several years of effort by the representatives of the interested parties, including the ARRL, have resulted in an agreed United States WRC-15 proposal for a primary allocation of 9.900-10.500 GHz to the earth exploration-satellite service (active), or EESS (active), subject to appropriate protections for incumbent services. A request by a wireless broadband equipment manufacturer to permit broadband was considered but could not be accommodated.

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The 10 GHz band is the most popular of the allocations to the amateur service above 2.3 GHz. Based on the studies conducted for WRC-15, the ARRL is satisfied that EESS (active) can be accommodated in the band without causing intolerable harmful interference to the amateur service. The same is not true for wireless broadband. Accordingly, the ARRL opposes the introduction of wireless broadband into the 10 GHz band.

Through a Notice of Inquiry in GN Docket No. 14-177, the FCC already has initiated a proceeding to identify spectrum above 24 GHz that can be designated for mobile wireless broadband, including additional spectrum that can be authorized on an unlicensed (Part 15) basis. The ARRL believes that this is the appropriate mechanism, and the appropriate frequency range, to address the need identified in your March 2 letter.

If you or your staff have any questions with regard to this matter, or with regard to any matter involving the Amateur Radio Service, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "David Sumner". The signature is fluid and cursive, with a large initial "D" and "S".

David Sumner
Chief Executive Officer

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cc: FCC Chairman Wheeler
NTIA Administrator Lawrence E. Strickling