

REALLOCATION IMPACT STUDY OF THE 1990 - 2110 MHz BAND

Response to Title III of
The Balanced Budget Act Of 1997



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The Balanced Budget Act Of 1997

Ernesto A. Cerezo



U.S. DEPARTMENT OF COMMERCE
William M. Daley, Secretary

Larry Irving, Assistant Secretary
for Communications and Information, and
Administrator, National Telecommunications
and Information Administration

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KEY WORDS

1990-2025 MHz Band
2025-2110 MHz Band
Spectrum Usage
Space Programs/Systems
National Issues
International Agreements

EXECUTIVE SUMMARY

OVERVIEW

The National Telecommunications and Information Administration (NTIA) serves as the President's principal advisor on telecommunications policies pertaining to the Nation's economic and technological advancement and to the regulation of the telecommunications industry. It also serves as manager to the Federal Government's use of the radio frequency spectrum. NTIA's responsibilities include establishing policies concerning spectrum assignment, allocation and use, and providing the various departments and agencies with guidance to ensure that their conduct of telecommunications activities is consistent with policies as mandated in the NTIA Manual of Regulations and Procedures for Federal Radio Frequency Management. As part of these responsibilities, NTIA conducted a reallocation impact study of the 1990-2110 megahertz (MHz) band to the Federal users.

The Balanced Budget Act of 1997 (Act) was signed by the President on August 8, 1997. The Act requires the Federal Communications Commission (FCC), among other things, to reallocate the 2110-2150 MHz band, a total of 40 MHz of spectrum, and another 15 MHz of spectrum from the 1990-2110 MHz band for assignment by competitive bidding. With regards to the reallocation of the 15 MHz from the 1990-2110 MHz band, if the President determines that such spectrum cannot be reallocated due to the need to protect incumbent Federal systems from interference, Title III of the Act permits him to identify alternative bands of frequencies totaling 15 MHz and report to the Congress no later than August 8, 1999.

This report presents information that could be used to evaluate the impact, on Federal systems, of reallocating the 15 MHz from the 1990-2110 MHz band for competitive bidding. Specific information includes: overview of current allocation rules and regulations, as well as, pertinent national and international footnotes governing the use of the entire radio frequency spectrum; Federal Government spectrum usage; Federal Government current and future space programs/systems operating in the 1990-2110 MHz band; and international agreements and national issues pertaining to the 1990-2110 MHz frequency spectrum. In addition, the report addresses the impact on the closely related 2200-2290 MHz band if 15 MHz of spectrum is reallocated from the 1990-2110 MHz band.

This report also identifies operational requirements for the National Aeronautics and Space Administration's (NASA's) space research operations at Goldstone, California and the National Oceanic and Atmospheric Administration's (NOAA's) space research and Earth exploration-satellite services at Wallops Island, Virginia, Fairbanks, Alaska, and the soon to be developed back-up station at Goddard Space Flight Center in Maryland.

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Aspects of frequency sharing between Government and non-government operations in the 2025-2110 MHz band have not been considered in this report. However, technical analyses of sharing potential have been addressed within the domain of the International Telecommunications Union (ITU). Two specific ITU Recommendations, SA.1154 and F.1247, present provisions to facilitate sharing between space and terrestrial services in the 2025-2110 MHz band. Both of these Recommendations recognize the susceptibility of space science services to interference from terrestrial services, especially in the space-to-space direction. Specifically, Recommendation SA.1154 stipulates that, implementation of mobile systems in the band be limited to “low-density” services. Recommendation F.1247 describes the characteristics of the fixed service which will facilitate frequency sharing with space science services in the band.

REALLOCATION IMPACT ASSESSMENT OF THE 15 MHz TO FEDERAL USERS

The impact assessment for reallocating 15 MHz of spectrum from the 1990-2110 MHz band is predicated on the following five key factors: 1) Federal Government band usage; 2) the major systems, including their critical functions or missions, supported in each of the band segments; 3) international agreements, as well as, national issues relating to the 1990-2110 MHz band or portions thereof; 4) the reallocation impact to other bands; and 5) Federal Government investment/relocation costs. A summary of the findings by band segment is presented below.

1990-2025 MHz Band

Reallocation of 15 MHz of spectrum from this band segment would have little or no impact to the Federal users. This band is practically unused by the Federal Government. As such, there are no major systems operating in the band and the Federal investment is minimal.

2025-2110 MHz Band

Reallocating 15 MHz from this band for competitive bidding would:

1. Affect numerous NASA and NOAA operations in the space science services, including safety-of-life operations;
2. Create uncertainty as to the type of services that will be employed by future FCC licensees but, more likely generate bidding from high-density wireless communications services which are not compatible with space sciences services in this band;
3. Severely impact the space operations in the companion downlink band (2200-2300 MHz);

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4. Impact NASA's and NOAA's abilities to support national space science directives and fulfill international agreements;
5. Dramatically increase the current investment cost, which is in the tens of billions of dollars, because of detailed new studies and designs, inflation and systems' costs, and extra expenditures including monetary support to joint space ventures with other administrations;
6. Create an immeasurable problem for NASA and NOAA as to what band would their space science operations move to, as well as, what will be the corresponding companion or downlink band, and, more importantly, who will pay for the reallocation costs; and
7. Potentially compromise the United States' abilities to honor and fulfill its international obligations with respect to space science services.

Furthermore, any changes regarding space operations in the United States, because of the reallocation of 15 MHz from the 2025-2110 MHz band, have to be coordinated with the international community for compatibility. Especially, to those administrations whose space programs are being supported by the United States or those administrations that have joint space ventures with the United States in this band. Enforcing these changes, however, with foreign space agencies would be very difficult, specifically if the United States would require them to undergo modifications commensurate to any changes in United States space systems' operations to maintain compatibility.

GOVERNMENT SPECTRUM USAGE AND MAJOR SYSTEMS

1990-2025 MHz Band

Based on the retrieved data from the Government Master File, the band segment 1990-2025 MHz is unused by the Federal agencies. There are only two Federal Government frequency assignments in this band and both are experimental in nature. As such, these assignments may not be afforded electromagnetic interference protection.

2025-2110 MHz Band

The 2025-2110 MHz band is extensively used by NOAA and NASA. There are more than 200 Federal Government frequency assignments in this band, as of September 1998. The 2025-2110 MHz band is used in the United States as the primary backbone communications link for the National Space Programs within NOAA and NASA to support their respective national space directives. Specifically, NOAA has 30 frequency assignments in this band, as of September 1998 and, all, virtually support the Geostationary Operational Environmental Satellite (GOES), Landsat and the Polar-orbiting Environmental Satellite Systems. These assignments also support other

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administrations' space programs through NOAA's commitment with the World Meteorological Organization and other international space organizations. The GOES satellite system provides timely, high-resolution weather data that includes, inter alia, input into the Numerical Weather Prediction (NWP) models resulting in accurate weather forecasts over the continental United States, and the collection and dissemination of meteorological data. The Landsat 7 system scheduled for launch in Spring 1999, will collect a global archive of multi-spectral images. These data will be used for global monitoring of agriculture, forestry, and range resources, land use and mapping, geology, water resources, coastal resources, urban change and planning, environmental monitoring and assessment, and other uses. The polar orbiters track and/or monitor environmental pollution, forest fires and volcanic activities to name just a few applications.

NASA is the largest Federal user in the 2025-2110 MHz band. Common uses allow for "cross support" between NASA and other international space agencies; emergency operations, particularly where astronaut safety is concerned; and the ability to control and de-orbit errant spacecraft. NASA has over 180 frequency assignments, as of September 1998, in this band supporting the operations of numerous United States and international satellite systems. This band is of very critical importance to NASA's space tracking; space telecommand; space operation; space telemetering; space research; satellite emergency position-indicating radio beacon; and other services in support to national space science directives. This band also supports NASA's numerous and complex space-related experiments.

NASA has used the 2025-2110 MHz portion of the spectrum in support of virtually all of its mission spacecraft since the days of the Apollo Program and, continuing to this date, in support of more complex programs: such as the National Space Transportation System (Space Shuttle), Tracking and Data Relay Satellite, Hubble Telescope; Spaceflight Tracking & Data Network; Deep Space Network to name just a few and, in the very near future, the International Space Station Program. The missions of these space systems are summarized below.

In addition, the 2025-2110 MHz band is currently used and is expected to be more fully used in the future for commercial space endeavors. Both, the Land Remote Sensing Act of 1992 and the Commercial Space Act of 1997 strongly promote commercial space opportunities as a priority goal of the United States. Many new and innovative commercial space projects have been initiated by such companies as Boeing, Kistler Aerospace, Earthwatch, and Space Imaging L.P. These efforts in a large part are supported by communications in the 2025-2110 MHz band. Also, NASA, when requested, provides S-band (2 GHz) support to commercial users as required for launch orbit insertion and for emergency situations.

MISSIONS AND FUNCTIONS OF UNITED STATES SPACE SYSTEMS

- Collect meteorological data and some of which are used as input into the NWP models which provide timely and accurate weather forecasts.

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- Provide environmental data used to track/monitor forests fires and depletions, volcanic activities, ozone depletion and environmental pollution.
- Study other planets and celestial bodies, the properties of the Earth's upper and lower atmosphere, and various solar phenomena (*e.g.*, X-ray and gamma ray sources, Ultraviolet, X-ray and gamma radiation, diffuse radiation of cosmic origin, charged and neutral particles, element and isotropic composition of several distinct samples of matter, the universe age and size, etc.);
- Conduct measurements on high resolution plasma, magnetic and electric field, the motion of local inertial space with respect to distant inertial space, temperature difference in cosmic microwaves, nitric oxide in terrestrial lower atmosphere and inputs from the Sun and magnetosphere, visible and near-infrared radiation reflected by Earth, etc.
- Conduct interplanetary and planet Earth missions, space sciences experiments using scientific payloads, and three-dimensional imaging techniques to study the global responses of the Earth's magnetosphere to variation of solar winds.
- Surveys the entire celestial sphere in extreme ultraviolet spectrum.

NATIONAL ISSUES AND INTERNATIONAL AGREEMENTS (1990-2110 MHz BAND)

National issues encompass those emanating from the Office of the President, the Congress, the FCC and, by in large, the public. International agreements or treaties include, but not limited to, those that were adopted by the ITU and its study groups, and those bilateral or multi-lateral treaties in which an administration is a signatory. International agreements, treaties and obligations are usually tied to domestic policy matters. As such, they must be considered if spectrum auctions are to be viable because they affect the potential for new radio services in and outside the United States. Some of the national issues and international agreements germane to the 1990-2025 MHz and 2025-2110 MHz bands are presented in this report.

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INVESTMENT/REALLOCATION COSTS

- NASA's total current investment on space programs that utilize the 2025-2110 MHz band is over \$42 billion.
- NASA's total current and projected investment on space programs that utilize the 2025-2110 MHz band is over \$76 billion.
- NOAA's current investment on space programs that utilize the 2025-2110 MHz band is almost \$5 billion.
- NOAA's total current and projected investment on space programs that utilize the 2025-2110 MHz band is over \$11 billion.

Relocation costs of Federal users of the 2025-2110 MHz band have not been specifically assessed in this report since the overall economic impact of such a relocation is directly a function of the following factors: 1) which 15 MHz portion of the band is selected for reallocation; 2) when the Federal Government operations in this portion of the spectrum must cease; and 3) where in the spectrum are the services, which were formerly conducted in this 15 MHz, to be relocated. NASA, however, provided a Federal system replacement cost of about \$13 billion.

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LIST OF ACRONYMS AND ABBREVIATIONS

AF	Air Force
ATDRSS	Advanced Tracking and Data Relay Satellite System
BAS	Broadcast Auxiliary Service
CCSDS	Consultative Committee on Space Data Systems
CDA	Command and Data Acquisition
CNES	National Space Agency of France
COSPAS	Cosmicheskaya Sistyema Poiska Avariynich Sudov
CTRS	Cable Television Relay Service
DARA	German Space agency
DOI	Department of Interior
DoD	Department of Defense
DORIS	Doppler Orbitography and Radiopositioning Integrated by Satellite
EES	Earth Exploration Satellite
EESS	Earth Exploration Satellite Service
EIRP	Equivalent Isotropically Radiated Power
EMI	Electromagnetic Interference
ENG	Electronic News Gathering
EPIRB	Emergency Position-Indicating Radiobeacon
EROS	Earth Resource Observation System
ESA	European Space Agency
EUMETSAT	European Meteorological Satellite
EUTELSAT	European telecommunication Satellite
FAS	Frequency Assignment Subcommittee
FCC	Federal Communications Commission
FNPRM	Further Notice of Proposed Rule Making
FPLMTS	Future Public Land Mobile Telecommunications Systems
FS	Fixed Service
GMF	Government Master File
GOES	Geostationary Operational Environmental Satellite
GPS	Global Positioning System
GRO	Gamma Ray Observatory
GSFC	Goddard Space Flight Center
GSTDN	Ground Spaceflight Tracking and Data Network
HST	Hubble Space Telescope
IGMSDCS	International Geostationary Meteorological Satellite Data Collection System
IRAC	Interdepartment Radio Advisory Committee
ISEE	International Sun Earth Explorer
ISS	International Space Station
ITCOP	Interagency Tracking, Communications, Operations Panel
ITU	International Telecommunication Union
LEO	Low Earth Orbit
LTTS	Local Television Transmission Service

LIST OF ACRONYMS AND ABBREVIATIONS (Continued)

METEOSAT	Meteorological Satellite
METOP	Meteorological Operational
MSS	Mobile Satellite Service
NASA	National Aeronautics and Space Administration
NASDA	Japanese Space Agency
NOAA	National Oceanic and Atmospheric Administration
NPOESS	National Polar-orbiting Environmental Satellite System
NTIA	National Telecommunications and Information Administration
NWP	Numerical Weather Prediction
OMB	Office of Management and Budget
PCS	Personal Communications Services.
PEACESAT	Pacific Education and Communications Experiments by Satellite
POESS	Polar-orbiting Environmental Satellite System
RFI	Radio Frequency Interference
SARSAT	Search and Rescue Satellite
SFCG	Space Frequency Coordination Group
SGLS	Space Ground Link Subsystem
SNIP	Space Network Interoperability Panel
SOS	Space Operation Service
SRS	Space Radiocommunications Station
SRS	Space Research Service
SRV	Systems Review File
STDN	Spaceflight Tracking and Data Network
TDRSS	Tracking and Data Relay Satellite System
TOPEX	Topography Ocean Experiment
TT&C	Tracking, Telemetry, and Command
UARS	Upper Atmosphere Research Satellite
USGS	United States Geological Survey
WARC	World Administrative Radio Conference
WEFAX	Weather Facsimile
WMO	World Meteorological Organization
WRC	World Radiocommunication Conference

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BACKGROUND

The National Telecommunications and Information Administration (NTIA), an agency of the U.S. Department of Commerce, is responsible for managing the Federal Government's use of the radio spectrum. NTIA establishes policies concerning frequency assignment, allocation and use, and provides the various U.S. Departments and Agencies with guidance to ensure that their conduct of telecommunications activities is consistent with these policies.¹ Further, NTIA serves as the President's principal advisor on telecommunication policies pertaining to the nation's economic and technological advancements and to the regulation of the telecommunications industry. NTIA develops executive branch positions to ensure that policy is effectively presented to Federal agencies, the Federal Communications Commission (FCC), Congress, and the public.

On August 8, 1997, the President signed the Balanced Budget Act of 1997 (Act). The Act requires the FCC, among other things, to reallocate from the 2110-2150 MHz band, a total of 40 MHz of spectrum, for assignment by competitive bidding. If, however, the FCC determines that auction of other spectrum better serves the public interest, convenience, and necessity, and can reasonably be expected to produce greater receipts, then the Commission shall identify an alternative 40 MHz of spectrum and report to Congress no later than August 8, 1999.²

The Act also requires the FCC to reallocate and auction a total of 15 MHz from the 1990-2110 MHz band for assignment by competitive bidding, unless the President determines that such spectrum cannot be reallocated due to the need to protect incumbent Federal systems from interference.³ In addition, if the President determines that the allocation of other spectrum better serves the public interest, convenience, and necessity, and can reasonably be expected to produce comparable receipts, then the President, after making such determination, shall identify alternative bands of frequencies totaling 15 MHz and report to the Congress an identification of such alternative bands for assignment by competitive bidding no later than August 8, 1999.⁴

¹ The National Telecommunications and Information Administration Organization Act, Pub. L. No. 102-538, 106 Stat. 3353 (1992) (codified at 47 U.S.C. § 901 *et seq.*).

² The Balanced Budget Act of 1997, Pub. L. 105-33, 111 Stat. 251 (1997) Title III-Communications and Spectrum Allocation Provisions, (1997).

³ In accordance with Section 3002(c)(2)(D) and (E) of the Budget Act, the FCC, in making available bands of frequencies for competitive bidding, must, among other things comply with the requirements of international agreements concerning spectrum allocations and coordinate with the Secretary of Commerce when there is any impact on Federal Government spectrum use. Budget Act, §§ 3002(c)(2)(D),(E), *supra* note 2.

⁴ *See* Budget Act, § 3002 (c) (4), *supra* note 2.

The FCC, in making available bands of frequencies for competitive bidding, shall:

1) seek to promote the most efficient use of the electromagnetic spectrum; 2) consider the cost of relocating existing uses to other bands of frequencies or other means of communication; 3) consider the needs of existing public safety radio services; 4) comply with the requirements of international agreements concerning spectrum allocations; and 5) coordinate with the Secretary of Commerce when there is any impact on Federal Government spectrum use.⁵

As a result of the NTIA Ad Hoc 206 tasking, Implementation of the Results of the World Administrative Radio Conference of 1992 (WARC-92) and the World Radiocommunication Conference of 1995 (WRC-95), the national allocation of the 1990-2110 MHz frequency span has been amended, as shown in Table 2-1. The 1990-2025 MHz and 2025-2110 MHz frequency bands are allocated exclusively to the non-government on a primary basis for mobile-satellite, and fixed and mobile services, respectively. Although the 2025-2110 MHz band has been allocated exclusively to the non-government, there are footnotes in this frequency range that accommodate Federal Government use, as indicated in Table 2-2. However, the National Aeronautics and Space Administration (NASA) through NTIA has proposed to the FCC that the 2025-2110 MHz band be upgraded to primary status in the United States in order to bring the National Table of Frequency Allocations in line with that of the international allocation where the space science services are afforded primary allocation status worldwide (*see* Annexes C and D).

The majority of Federal use in the 2025-2110 MHz frequency range is vital to the successful operation of numerous Federal satellite and spacecraft systems, as well as, foreign systems that the United States supports by virtue of international agreements. The services provided by these systems include, but are not limited to: accurate weather forecasts, ozone measurements, scientific research on the Sun-Earth interaction, atmospheric surveillance and mapping, oceanography research, monitoring of volcanoes, forest fires, pollution and rain forest depletion, probing the secrets of the universe and analyzing light sources, delivering satellites to low-Earth orbit, conducting in-orbit scientific experiments, detecting visible and near infrared radiation, exchanging social environmental, health, and educational information between countries of the Pacific Basin, and, in the near future, servicing facility for various free-flying spacecraft and staging base for space exploration just to name a few. Federal Government investment costs in these satellite and spacecraft systems, along with their associated earth stations, are in the tens of billions of dollars.

Specifically, the 2025-2110 MHz band is used in the United States as the primary backbone communications band for the National Space Programs within NASA and the National Oceanic and Atmospheric Administration (NOAA). NASA has used this portion of the spectrum in support of virtually all of its mission spacecraft since the days of the Apollo Program. The band supports the Tracking and Data Relay Satellite System (TDRSS), the Mission to Planet Earth Program, Space Shuttle and Hubble Telescope Programs, and is slated to provide baseline service to the International Space Station (ISS). It also supports NOAA's Geostationary Operational Environmental Satellite

⁵ *Id.*

(GOES), Landsat 5 and 7 systems, and the polar orbiters, as well as, evolving commercial systems and other various space systems.

The physics of this frequency range allow for *all weather communications links through the atmosphere* and provide the capability to establish communications with a satellite which has lost its ability to orient itself. This band was used in re-establishing control of the first TDRSS satellite (TDRSS-1), the Solar Heliospheric Observatory (SOHO) spacecraft, and the Olympus satellite which is owned by the European Space Agency (ESA). Other frequency bands, specifically higher bands, would not have provided this very crucial capability.

In a related matter, the FCC, on March 14, 1997, released the First Report and Order and Further Notice of Proposed Rule Making (FNPRM) regarding the allocation of the 1990-2025 MHz to the mobile-satellite service (MSS).⁶ Specifically, the Commission plans to allocate 70 MHz of spectrum at 1990-2025 MHz and 2165-2200 MHz to the MSS, effective January 1, 2000. In the plan, FCC proposed to modify the current Broadcast Auxiliary Service (BAS), Cable Television Relay Service (CARS), and Local Television Transmission Service (LTTS) allocation at 1990-2110 MHz by providing an allocation to these services at 2025-2130 MHz band. In addition, the FCC proposes to re-channelize BAS at 2 GHz from seven channels of 17 and 18 MHz of bandwidths to seven channels of 15 MHz bandwidth.

This report presents information that could be used to evaluate the impact of reallocating the 15 MHz of spectrum for competitive bidding from the 1990-2110 MHz band. Specific information includes: overview of current allocation rules and regulations, as well as, pertinent national and international footnotes governing the use of the entire frequency range; Federal Government spectrum usage; Federal agencies' current and future space programs or systems operating in the 1990-2110 MHz band; international agreements and national issues pertaining to the 1990-2110 MHz frequency span; and reallocation impact of the 15 MHz to the 2200-2290 MHz band. In addition, it identifies the operational requirements for NASA's space research service at Goldstone, California and NOAA's space research and Earth exploration-satellite services at Wallops Island, Virginia, Fairbanks, Alaska and the soon to be built backup earth station at Goddard Space Flight Center (GSFC) in Greenbelt, Maryland. It should be noted that these transmitting earth stations can operate at a maximum range of 500 watts to 500 kilowatts of power.

Further, this report focuses only on the 1990-2110 MHz frequency span because of Federal Government's extensive investment and vital interest in this portion of the band. Section II presents discussion on allocation rules that include applicable footnotes for each segment of the 1990-2110 MHz band. It also includes discussion on the unclassified information on Federal Government's spectrum usage, and description of major systems and their functions. Section II,

⁶ FCC, First Report and Order and Further Notice of Proposed Rule Making, Amendments of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service, ET Docket No. 95-18, (March 14, 1997).

however, does not include discussion on non-government spectrum usage. Section III presents the discussion on international agreements and national issues relating to the 1990-2110 MHz band or portion thereof, and the 15 MHz reallocation impact to the 2200-2290 MHz band, as well as, NASA's and NOAA's investment/relocation costs. Section IV presents the summary on the 15 MHz reallocation impact assessment.

OBJECTIVE

The objective of this task was to research, examine and present current data that could be used to evaluate the impact, on Federal systems or users, of reallocating 15 MHz of spectrum from the 1990-2110 MHz band, for assignment by competitive bidding.

APPROACH

To accomplish the objective of the task, the following approach was undertaken:

1. Coordinate with major Federal Government users of the 1990-2110 MHz band;
2. Examine the Government Master File (GMF) and the Systems Review File (SRF) records, the Space Radiocommunications Station (SRS) and the Space Frequency Coordination Group (SFCG) data, along with governing rules, applicable footnotes, spectrum usage and channeling plans in the 1990-2110 MHz band;
3. Examine international agreements and outstanding national issues regarding the 1990-2110 MHz band or portion thereof;
4. Investigate the 15 MHz reallocation impact on the 2200-2290 MHz band; and
5. Estimate overall current and projected economic investment on Federal systems in the 1990-2110 MHz band.

The major sources from which the information on Federal Governments's spectrum usage, system's description and functions, and estimate overall economic investment were derived from either one of the following sources: the GMF, SRV, agencies' input documents and literature, and other government documents. As far as the international agreements and national issues relating to the 1990-2110 MHz band, the following texts were used: the International Telecommunication Union's (ITU) Radio Regulations, the Final Acts of the World Radiocommunication Conferences (i.e., WARC-92, WRC-95 and WRC-97), other ITU documents, and relevant FCC rule making documentation.

SECTION II

SUMMARY OF FEDERAL GOVERNMENT SPECTRUM USAGE IN THE 1990-2110 MHz BAND

ALLOCATION RULES

The international and national allocations, along with the corresponding footnotes, for the 1990-2110 MHz span are shown in Table 2-1.⁷ This table includes international changes to frequency allocations that resulted from WARC-92 and WRC-95 that have not as yet been reflected within the U.S. National Table of Frequency Allocations. Also included are domestic changes to the U.S. Table of Frequency Allocations that have been proposed by NTIA and forwarded to the FCC for consideration for national adoption. Footnotes that were approved or modified at the WRC-97 are shown with brackets. Note that only international footnotes relevant to the United States are included in the Table. Nationally, the entire frequency span is composed of two major bands, the 1990-2025 MHz and the 2025-2110 MHz bands. These bands are exclusively allocated to the non-government for mobile-satellite, and fixed and mobile services on a primary basis, respectively. However, there are footnotes in this entire span of spectrum that accommodate Federal Government use. These footnotes are enumerated and described in Table 2-2.

Government use of these bands ranges from secondary use or non-interference basis, in some cases, to primary co-equal use, in one case. Specifically, in the entire 1990-2110 MHz span, Government space research earth stations may be authorized to use specific frequencies at specific sites for Earth-to-space transmissions. These authorization shall be secondary to non-government operations in the band. In the 2025-2110 MHz band segment, Earth-to-space and space-to-space transmissions may be authorized in the space research and Earth exploration-satellite services, however, such transmissions shall not cause harmful interference to non-government stations operating in accordance with the National Table of Frequency Allocations. Also, in the 2025-2110 MHz band segment, Government earth resources satellite earth stations in the Earth exploration-satellite service may be authorized to use the frequency 2106.4 MHz for Earth-to-space transmissions for tracking, telemetry, and telecommand at certain sites. Such transmissions, however, shall not cause harmful interference to non-government operations. On the other hand, the GOES earth stations on the space research and Earth exploration-satellite services may be authorized on a co-equal basis to use the frequency band 2025-2035 MHz band for Earth-to-space transmissions for tracking, telemetry, and telecommand at certain sites. These sites are included on the list in Table 2-7.

⁷ The National Allocation of the 1990-2110 MHz frequency range presented here is a result of the NTIA Ad Hoc 206 Report, AH 206-388/8, Implementation of the Results of WARC-92 and WRC-95, (April 1998).

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SUMMARY OF FEDERAL GOVERNMENT SPECTRUM USAGE IN THE
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TABLE 2-1: INTERNATIONAL AND NATIONAL ALLOCATIONS AND FOOTNOTES
ATTRIBUTED TO THE 1990-2110 MHz FREQUENCY SPAN ^a

INTERNATIONAL			UNITED STATES		
Region1 (MHz)	Region 2 (MHz)	Region 3 (MHz)	Frequency Band (MHz)	Government Allocation	Non-gov't. Allocation
1980-2010 FIXED MOBILE MOBILE-SATELLITE (Earth-to-space) S5.388 S5.389A S5.389B			1980-1990		FIXED MOBILE
2010-2025 FIXED MOBILE S5.388	2010-2025 FIXED MOBILE MOBILE-SATELLITE S5.388 [S5.389C] S5.389D S5.389E	2010-2025 FIXED MOBILE S5.388	1990-2025	US111	MOBILE-SATELLITE (Earth-to-space) US111 NG156^b
2025-2110 FIXED MOBILE SPACE RESEARCH (Earth-to-space) (space-to-space) SPACE OPERATION (Earth-to-space) (space-to-space) EARTH EXPLORATION-SATELLITE (Earth-to-space)(space-to-space) [S5.391] ^c S5.392			2025-2110	US90 US111 US219 US222	FIXED MOBILE US90 US111 US219 US222 NG23 NG118 [S5.391]

^a This table includes international changes to frequency allocations that resulted from WARC-92 and WRC-95 that have not as yet been reflected within the U.S. National Table of Frequency Allocations. Also included are domestic changes to the U.S. Table of Frequency Allocations that have been proposed by NTIA and forwarded to the FCC for consideration for national adoption.

^b This is a proposed footnote for the 1990-2025 MHz band. *See Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for Use by the Mobile-Satellite Service, ET Dkt. No. 95-18, First Report and Order and Further Notice Of Proposed Rule Making, 12 FCC Rcd 7388 (1997).*

^c This international footnote is a result of WRC-97.

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SUMMARY OF FEDERAL GOVERNMENT SPECTRUM USAGE IN THE 1990-2110 MHz BAND

SUMMARY OF FEDERAL SPECTRUM USAGE

The information on spectrum usage is based entirely on the frequency assignment records in the GMF, as of September 1998, and supplemental data provided by the Federal agencies. A summary of the current total number of Federal Government frequency assignments, as per the GMF, is shown in Table 2-3.

A graphical representation of these assignments in the entire 1990-2120 MHz frequency span is shown in Figure 2-1. Note, however, that Figure 2-1 only includes Federal Government and non-government authorized frequency assignments that are in the GMF and not those authorized for the private sector, such as for electronic news gathering. Figure 2-2 represents the graphical representation of the current plus future frequency assignments in the entire 1990-2120 MHz band. In this study, future frequency assignments only include those of NASA and NOAA that were planned for submission to the Frequency Assignment Subcommittee (FAS) of the Interdepartment Radio Advisory Committee (IRAC) for approval. Again, Figure 2-2, does not include private sector's current and future frequency assignments for electronic news gathering. The majority of the frequency assignments or listings represented in Figures 2-1 and 2-2 are for the space science services (i.e., space research, space operation, and Earth exploration-satellite services). It can be seen from both figures that the 2025-2120 MHz band segment is or will be heavily used by the Federal Government.

A graphical representation of the current, and current plus future international frequency assignments in the 1990-2120 MHz band is depicted in Figures 2-3 and 2-4, respectively. Current international frequency assignments refer to those listed, as of September 1998, in the Space Radiocommunications Station (SRS) of the ITU. Future international frequency assignments refer to those that are unpublished in the ITU register, but have already been received in the SRS and are either under coordination or notification process, as of September 1998. It is noteworthy that in Figure 2-3, the band segment 2010-2025 MHz presently has no registered international frequency assignments. Again, in the same band segment in Figure 2-4, it appears that there are very few pending request for frequency assignments before the ITU. Figures 2-3 and 2-4 only represent space science and mobile satellite services assignments. All figures use a 0.5 MHz resolution and were derived by plotting the carrier frequency and the emission bandwidth (i.e., carrier frequency \pm 1/2 bandwidth).

For practical purposes and convenience, discussion regarding Federal Government spectrum usage, and description and functions of major systems in the entire frequency span, including the portrayal of total number of authorized frequency assignments, is divided into two sub-bands, namely 1990-2025 MHz and 2025-2110 MHz sub-bands.

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TABLE 2-2: APPLICABLE FOOTNOTES FOR THE 1990-2110 MHz BAND

U.S. FOOTNOTES

US90: In the band 2025-2110 MHz Earth-to-space and space-to-space transmissions may be authorized in the space research and Earth exploration-satellite services subject to such conditions as may be applied on a case-by-case basis. Such transmissions shall not cause harmful interference to non-government stations operating in accordance with the National Table of Frequency Allocations. All space-to-space transmission reaching the Earth's surface shall adhere to a power flux density of between -144 and -154 dBW/m²/4 kHz depending on the angle of arrival per ITU Radio Regulation 2557 and shall not cause harmful interference to the other space services.

US111--In the band 1990-2120 MHz, Government space research earth stations may be authorized to use specific frequencies at specific locations for earth-to-space transmissions. Such authorizations shall be secondary to non-Government use of this band and subject to such other conditions as may be applied on a case-by-case basis.

Corpus Christi, Texas, 27° 39' N 097° 23' W.	Fairbanks, Alaska, 64° 59' N 147° 53' W.
Goldstone, California, 35° 18' N 116° 54' W.	Greenbelt, Maryland, 39° 00' N 076° 50' W.
Guam, Mariana Island, 13° 19' N 144° 44' E.	Kauai, Hawaii, 22° 08' N 159° 40' W.
Merritt Is., Florida, 28° 29' N 080° 35' W.	Roseman, North Carolina, 35° 12' N 082° 52' W.
Wallops Is., Virginia, 37° 57' N 075° 28' W.	

US219: In the band 2025-2110 MHz Government earth resources satellite earth stations in the Earth exploration-satellite service may be authorized to use the frequency 2106.4 MHz for Earth-to-space transmissions for tracking, telemetry, and telecommand at the sites listed below. Such transmissions shall not cause harmful interference to non-government operations:

Sioux Falls, South Dakota, 43° 32' 03.1"N 096° 45' 42.8"W;
Fairbanks, Alaska, 64° 58' 36.6"N 147° 30' 54.2"W.

US222: In the band 2025-2035 MHz Geostationary Operational Environmental Satellite Earth stations of the space research and Earth exploration-satellite services may be authorized on a co-equal basis to use the frequency band 2025-2035 MHz band for Earth-to-space transmissions for tracking, telemetry, and telecommand at the sites listed below:

Wallops Island, Virginia, 37° 50' 48"N 075° 27' 33"W;
Seattle, Washington, 47° 34' 15"N 122° 33' 10"W;
Honolulu, Hawaii, 21° 21' 12"N 157° 52' 36"W.

US252: The bands 2110-2120 and 7145-7190 MHz, and 34.2-34.7 GHz are also allocated for Earth-to-space transmissions in the space research service, limited to deep space communications at Goldstone, California.

NON-GOVERNMENT

NG23: Frequencies in the band 2100-2200 MHz may also be assigned to stations in the international fixed public radio service located south of 25° 30' north latitude in the State of Florida and in U.S. Possessions in the Caribbean area, provided, however, no new assignments in the band 2150-2162 MHz will be made to such stations after February 25, 1974.

NG118: Television translator relay stations may be authorized to use frequencies in this band on a secondary basis to stations operating in accordance with the Table of Frequency Allocations.

NG156: In the 1990-2025 MHz band, incumbent fixed and mobile service operations (Television Broadcast Auxiliary and Cable Television Relay) may continue to use the band on a primary basis until a mobile satellite service applicant(s) relocates all affected operations according to the transition plan- found at 47 C.F.R. Sections 74.690 and 101.69. [*This is a proposed footnote for this band*].

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TABLE 2-2: APPLICABLE FOOTNOTES FOR THE 1990-2110 MHz BAND
(Con't)

INTERNATIONAL

S5.388: The bands 1885-2025 MHz and 2110-2200 MHz are intended for use, on a worldwide basis, by administrations wishing to implement the future public land mobile telecommunication systems (FPLMTS). Such use does not preclude the use of these bands by other services to which these bands are allocated. The bands should be made available for FPLMTS in accordance with Resolution 212 (Rev. WRC-95).

S5.389A: The use of the bands 1980-2010 MHz and 2170-2200 MHz by the mobile-satellite service is subject to coordination under Resolution 46 (Rev.WRC-95)/No. S9.11A and to the provisions of Resolution 716 (WRC-95). The use of these bands shall not commence before 1 January 2000; however the use of the band 1980-1990 MHz in Region 2 shall not commence before 1 January 2005.

S5.389B: The use of the bands 1980-1990 MHz by the mobile-satellite service shall not cause harmful interference to or constrain the development of the fixed and mobile services in Argentina, Brazil, Canada, Chile, Ecuador, the United States, Honduras, Jamaica, Mexico, Peru, Suriname, Trinidad and Tobago, Uruguay and Venezuela.

[MOD S5.389C]: The use of the bands 2010-2025 MHz and 2160-2170 MHz in Region 2 by the mobile-satellite service shall commence before 1 January 2005 and is subject to coordination under Resolution 46 (Rev.WRC-95)/No. S9.11A and to the provisions of Resolution 716 (WRC-95).

S5.389D: In Canada and the United States the use of the bands 2010-2025 MHz and 2160-2170 MHz by the mobile-satellite service shall not commence before 1 January 2000.

S5.389E: The use of the bands 2010-2025 MHz and 2160-2170 MHz by the mobile-satellite service in Region 2 shall not cause harmful interference to or constrain the development of the fixed and mobile services in Regions 1 and 3.

[MOD S5.391]: In making assignments to the mobile service in the bands 2025-2110 MHz and 2200-2290 MHz, administrations shall not introduce high-density mobile systems, as described in Recommendation ITU-R SA.1154, and shall take this Recommendation into account for the introduction of any other type of mobile system.

S5.392: Administrations are urged to take all practicable measures to ensure that space-to-space transmissions between two or more non-geostationary satellites in the space research, space operation and Earth exploration-satellite services in the bands 2025-2110 MHz and 2200-2290 MHz, shall not impose any constraints on Earth-to-space, space-to-Earth and other space-to-space transmissions of those services and in those bands between geostationary and non-geostationary satellites.

1990-2025 MHz Band Federal Usage

Based on the retrieved data from the GMF, the band segment 1990-2025 MHz is unused by the Federal agencies, as shown in Figure 2-1. Essentially, the two Federal Government assignments are both experimental in nature and may not be afforded electromagnetic interference (EMI) protection. This minimal Federal usage follows from the lack of any Federal allocations in this band segment.

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2025-2110 MHz Band Federal Usage

In contrast, the 2025-2110 MHz band is *extensively used*. The two major Federal Government users of the band are NASA and NOAA of the Department of Commerce. Under the Space Act of 1958, NASA and NOAA operate mission spacecraft that are totally dependent on radio spectrum access. Thus, as expected, there is an extensive use of this band for tracking, telemetry, and command (TT&C) of manned and unmanned Earth-orbiting satellites and space vehicles either through Earth-to-space links for satellites in all types of orbits or through space-to-space links using geostationary data relay satellites. Currently, all Federal Government uses in this band are shared with the non-government's use of low-density terrestrial communication; such as, the electronic news gathering. Such government and non-government shared-use in this band has been proven successful for over three decades through coordination. WARC-92 concluded that sharing between high density and conventional land mobile systems on the one hand and space services on the other hand is not feasible.⁸

NOAA uses the 2025-2110 MHz band to support numerous space-related radio services such as: space telecommand; space operation; space research; and meteorological services. NOAA has an ongoing requirement to provide continuous coverage of the Western Hemisphere for accurate weather prediction. This service being provided by NOAA is vital not only to the citizens of the United States but also to other countries. Presently, this image coverage is provided by the GOES satellites. In addition, NOAA has a worldwide commitment through the World Meteorological Organization (WMO), a part of the United Nations, to provide low resolution, direct readout weather imagery to *178 administrations*, as well as, a national commitment to support space science directives in this band.

NASA is the largest Federal user of this band. Common uses allow for "cross support" between NASA and other international space agencies; emergency operations, particularly where astronaut safety is concerned; and the ability to control and de-orbit errant spacecraft. Currently, it has approximately 160 authorized frequency assignments, as of September 1998, supporting the operations of numerous United States and international satellite systems. The 2025-2110 MHz band is of very critical importance to NASA's space tracking, space telecommand, space operation, space telemetering, space research, satellite emergency position-indicating radiobeacon (EPIRB), and other services in support of national space science directives. This band also supports NASA's numerous and complex space-related experiments.

⁸ Recommendation ITU-R SA. 1154, Provisions to Protect the Space Research, Space Operations and Earth-Exploration Satellite Services and to Facilitate Sharing with the Mobile Service in the 2025-2110 MHz Band.

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TABLE 2-3: NUMBER OF FREQUENCY ASSIGNMENTS FOR FEDERAL GOVERNMENT IN THE 1990-2110 MHz BAND, AS PER THE GMF (SEPT.1998)

Freq. Band (MHz)	Agency	No. of Freq. Assignments Per Station Class
1990-2025	Air Force	1/XT
	Army	1/XT
2025-2110	Air Force	7/XT
	Commerce	5/TD, 5/TW, 6/TH, 1/TF, 1/TC, 3/TT, 17/TM
	Interior	2/TC
	NASA	16/EK, 16/ED, 9/ET, 67/TH, 38/TD, 26/TW, 1/TF, 1/TE, 9/XT, 2/XC, 2/XD, 2/XR

LEGEND:

ED = Space Telecommand Space
MOEC = Surface Telemetry Mobile
TE = Mobile-Satellite Sat. EPIRB
TM = Meteorological-Satellite Earth
XC = Experimental Contract
XR = Experimental Research

EK = Space Tracking Space
TC = Fixed-Satellite Earth
TH = Space Research Earth
TT = Space Operation Earth
XD = Experimental Developmental
XT = Experimental Testing

ET = Space Operation Space
TD = Space Telecommand Earth
TF = Radiodetermination Satellite Earth
TW = Earth Exploration-Satellite Earth

Since the early 1960's, NASA has successfully used this band to support the many missions that started from the Apollo Program and, continuing to this date, supports more complex missions, such as; TDRSS, Hubble Space Telescope and the National Space Transportation System (Shuttle) Programs to name a few and, in the near future, the International Space Station Program. Some of the other space programs that are supported in this band are: Magellan, Mars Global Surveyor, International Comet Explorer, Cosmic Background Explorer, Earth Radiation Budget, International Solar Physics, Upper Atmosphere Research Satellite, Galileo, Ulysses, Cassini, Gamma Ray Observatory, Extreme Ultraviolet Explorer, Laser Geodynamic Satellite, Ocean Topography Experiment, Mars Pathfinder, GOES, Landsat and other NOAA series. A more complete listing of these programs/systems is shown in Table 2-5. Included in Table 2-5 is a brief description of the functions of these space programs/systems.

In addition, the 2025-2110 MHz band is used currently and is expected to be more fully used in the future, for commercial space endeavors. Both the Land Remote Sensing Policy Act of 1992 and the Commercial Space Act of 1997 strongly promote commercial space opportunities as a priority goal of the United States. Many new and innovative commercial space projects have been initiated by such companies as Boeing, Kistler Aerospace, Earthwatch and Space Imaging L.P. These

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efforts are in a large part supported by communications in the 2025-2110 MHz band. Also, NASA, when requested, provides S-band (2 GHz) support to commercial users as required for launch, orbit insertion and for emergency situations.

The other users of the bands are the Air Force (AF), with seven assignments, and the Department of Interior (DOI) with two assignments. Use of this band by the Air Force is confined to its test ranges in the East Coast for pre-launch check of missiles and satellites. In addition, the AF uses this band to support the pre-launch check of the NOAA Polar-orbiting satellites and the testing of the Space Shuttle's antenna systems. Although the DOI has only two assignments in this band, these frequency assignments support international agreements with Pacific Rim countries. Particularly, the DOI, in conjunction with NOAA, uses this band to promote community educational developments in the Pacific region through communications experiments with the use of the Pacific Education and Communications Experiments by Satellite (PEACESAT) network.

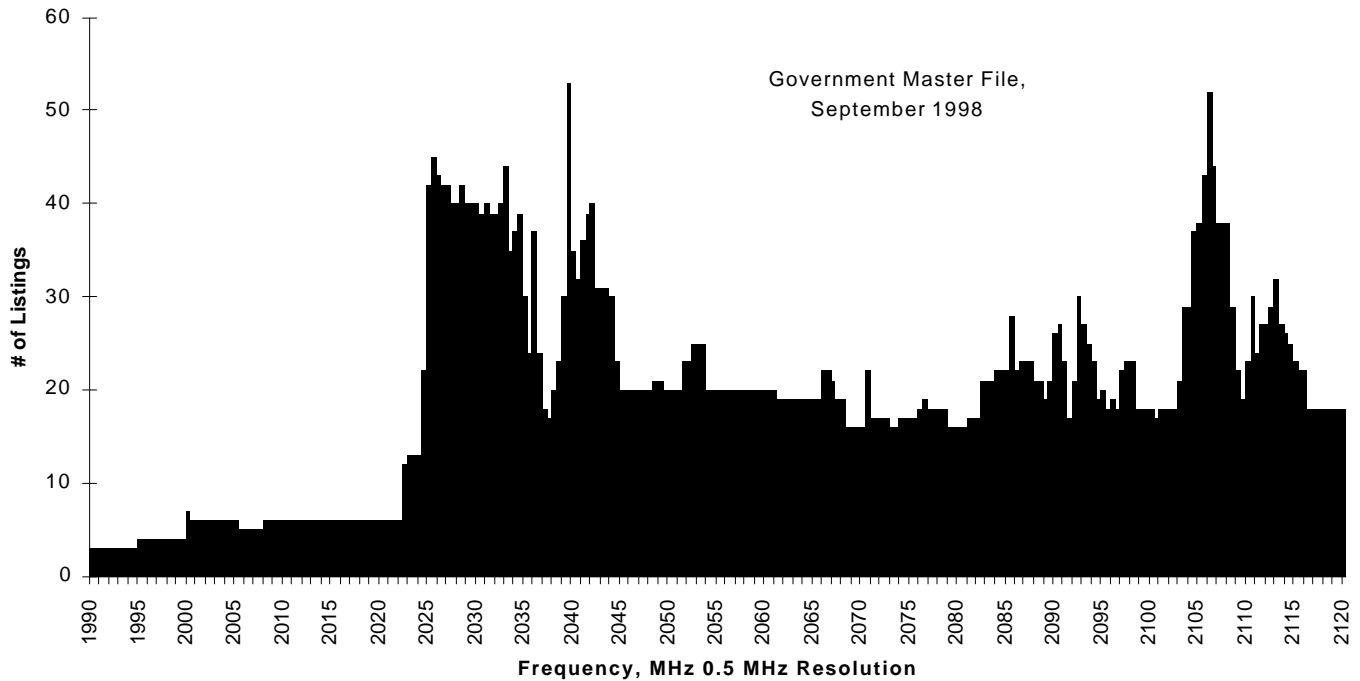
MAJOR SPACE PROGRAMS/SYSTEMS IN THE 2025-2110 MHz BAND

The GMF and the SRV are the primary sources of data used to identify the major systems operating in this band. The Federal agencies' input and other Federal Government documents, as well as literature, were used to augment the information taken from the GMF and the SRF. As indicated earlier, the 1990-2025 MHz band segment is essentially unused by the Federal Government and, as expected, there are no major systems found to be operating in the band. Therefore, only the major systems operating in the 2025-2110 MHz band are discussed in this Section. Table 2-4 provides a lists of these major systems and their respective operational uplink and downlink frequency bands. A short description of their functions and technical characteristics (as available) is presented in subsequent paragraphs. Figure 2-5 illustrates the data transfer and some of the benefits from space systems to the public or end-users.

Space programs/systems that were not discussed in detail are listed in Table 2-5. Basically, these are dependent on or receive communication link support from some of the major systems. Furthermore, the United States supports space programs of other administrations or space agencies or has joint space ventures with these. A list of these joint venture space programs is shown in Table 2-6. Table 2-6 only includes current foreign space programs.

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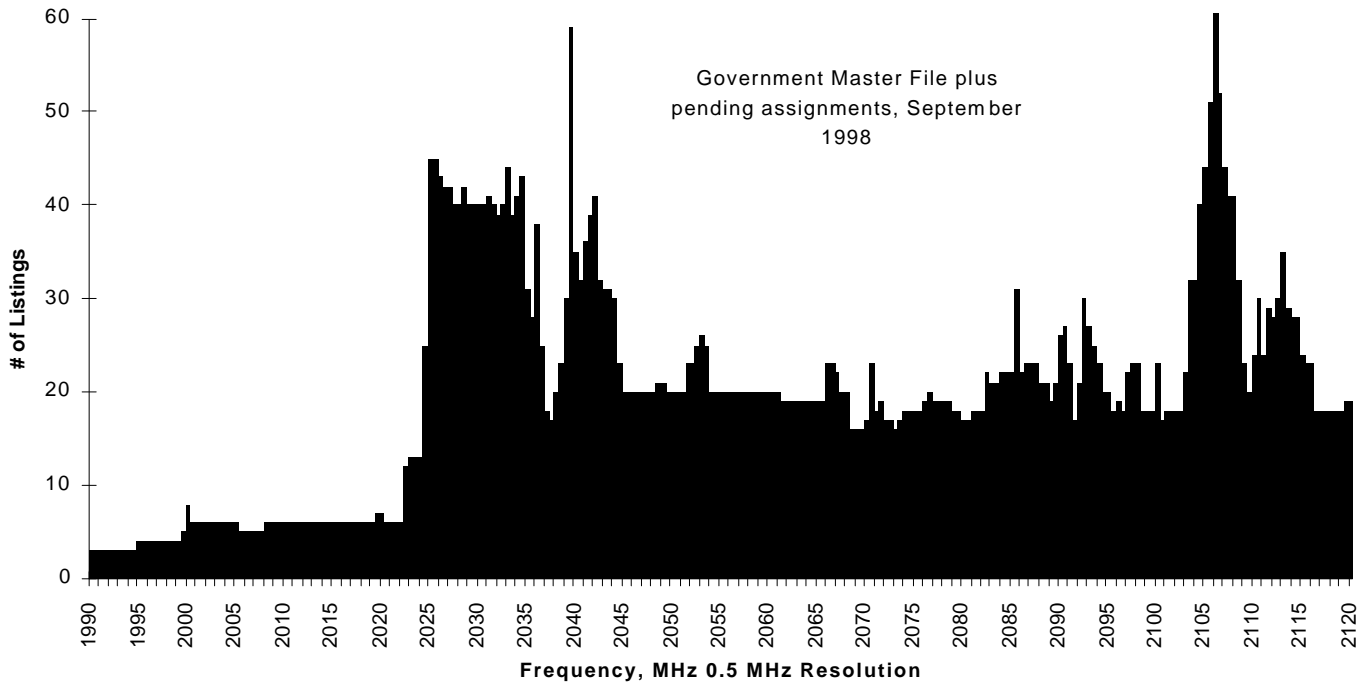


- Note: 1) The figure represents authorized frequency assignments or listings in the GMF, as of September 1998, and does not include the private sector's authorized frequency assignments such as for electronic news gathering.
- 2) The majority of the authorized frequency assignments are for space science services.

Figure 2-1.
**A graphical representation of the frequency assignments or listings in the
1990-2120 MHz band, as per the GMF (September 1998).**

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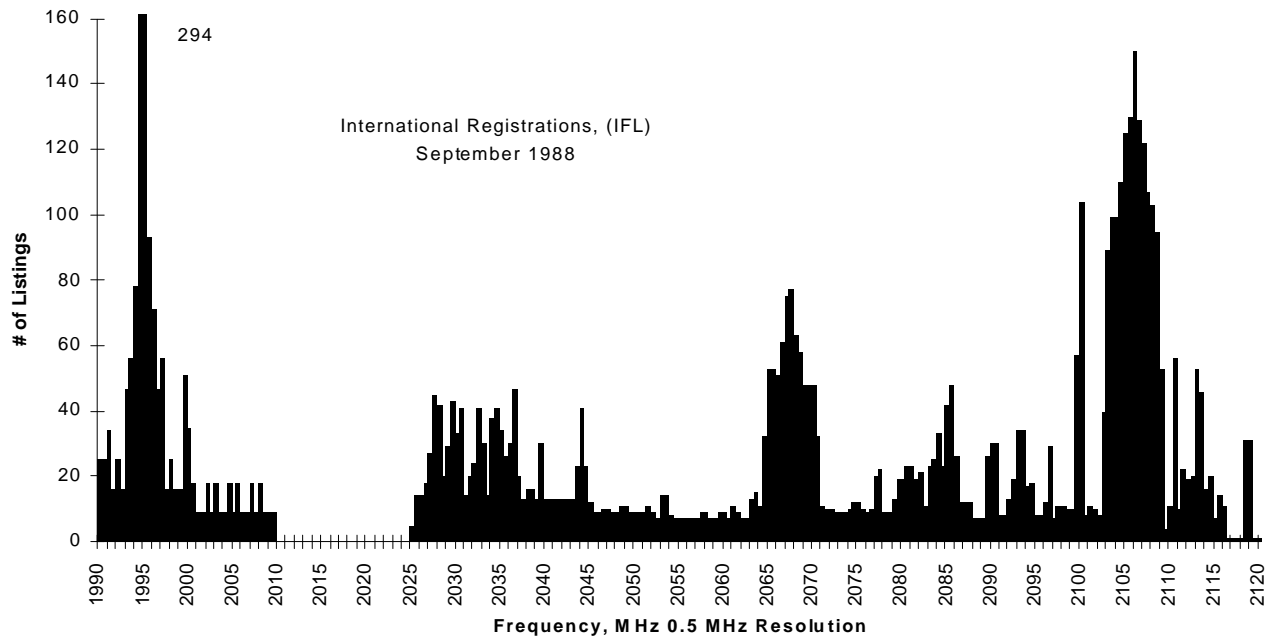


- Note: 1) The figure does not include the private sector's current and future frequency assignments or listings such as for electronic news gathering.
- 2) The majority of the frequency assignments are for space science services.

Figure 2-2.
A graphical representation of the current frequency assignments or listings in the GMF, as of September 1998, plus NASA's and NOAA's future frequency assignments planned for submission to the SPS in the 1990-2120 MHz band.

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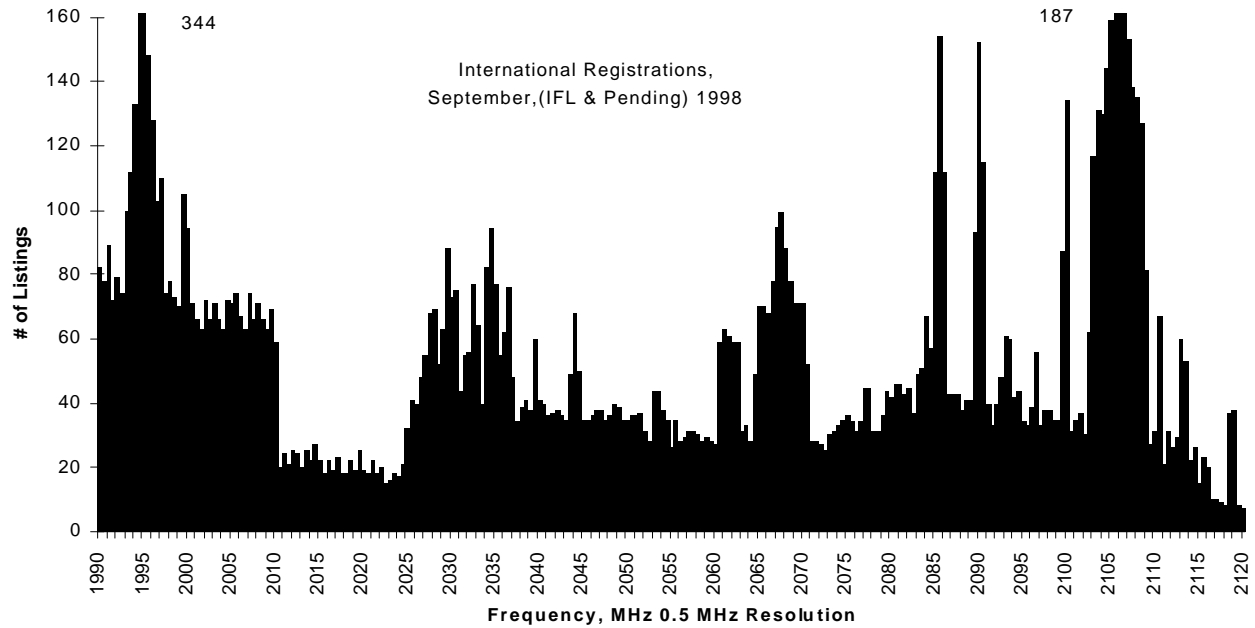


Note: The figure only represents international space science and mobile-satellite services listings.

Figure 2-3.
**A graphical representation of the current international frequency listings in the
1990-2120 MHz band, as per the SRS of the ITU (September 1998).**

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Note: The figure only represents international space science and mobile-satellite services listings.

Figure 2-4.
A graphical representation of the current and future international frequency listings in the 1990-2120 MHz band, as per the SRS of the ITU (September 1998).

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TABLE 2-4: MAJOR SPACE PROGRAMS/SYSTEMS IN THE 1990-2110 MHz AND
2200-2290 MHz BANDS

Program/System	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launch Date	Opn. Life (Yrs) ^a	Current Investment (Billions) ^b	Planned Investment (Billions) ^c
Geostationary Operational Environmental Satellite	2025-2035	2200-2290	1990-2010	5	2.0 ^d	3.9
Landsat	2106.4	2287.5	1999	6	0.8 ^f	0.9 ^f
Polar-orbiting Environmental System	2026	2247.5	1998-2007	3	2.0	6.4
Tracking & Data Relay Satellite System	2025-2120	2200-2300	1983-2000	15	2.6	4.4
National Space Transportation System	2025-2120	2200-2300	On-going	10	19.2	36.0
Hubble Space Telescope System	2106.4	2255.5 & 2297.5	1990	15	3.9	4.2
International Space Station	2025-2118.7	2200-2290	1998	15-20	10.4	21.3
Earth Orbiting Scientific Satellites	Not Available	Not Available	1999-2006	5	2.6	6.6
Spaceflight Tracking & Data Network	2025-2120	2200-2300	Ground based	Indef. ^e	1.8	2.0
Deep Space Network	2025-2120	2200-2300	Ground based	Indef.	1.6	1.8
TOTAL					46.35	87.5

^a Operational life expectancy of a space system, in years. Most satellites can be expected to operate beyond their design or operational life.

^b Investment to-date in FY 1998 dollars.

^c Total current and projected investment over mission life.

^d Cost is for the current 5 GOES satellites only.

^e Indefinite

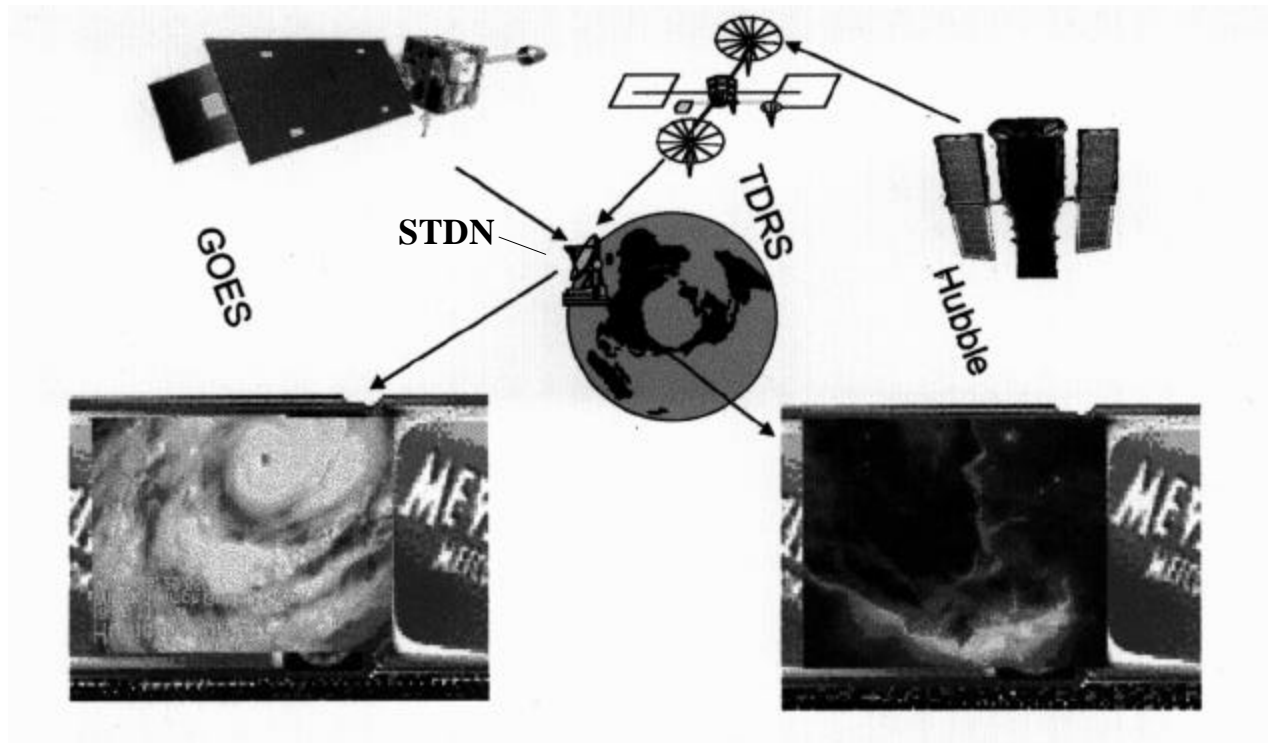
^f This is the cost for Landsat 7 only.

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Weather Images

Scientific Data



The NOAA GOES system provided opportunity for scientists to examine data and follow-up on hurricanes and other natural disasters.

The NASA Hubble Telescope system provided scientist with valuable data on the Super Nova.

Note: 1) Communications links are in the 2025-2110 MHz and 2200-2200 MHz bands.

2) For simplicity, the figure does not depict interaction between major and other space systems.

Figure 2-5.
Benefits and data transfer from space systems to the end users.

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It is important to note that these earth stations transmit to NASA and NOAA satellites at quite a high equivalent isotropically radiated power (EIRP). Typically, the transmitter power levels employed exceed the multi-kilowatt levels and, in the case of the Goldstone, California site, can be as high as 500 kilowatts. As a result, the areas around the earth stations within which interference can be caused to other shared services is quite large as seen in Annexes A-1 through A-15. Thus, any sharing situation proposed for this band must consider this radio frequency interference (RFI) potential.

Geostationary Operational Environmental Satellite (GOES) System

NOAA's GOES satellite system is a part of the International Geostationary Meteorological Satellite Data Collection System (IGMSDCS) which also include several satellites of other nations. GOES satellites provide timely, high resolution weather data over North and South America, and the collection and dissemination of meteorological data. At present NOAA operates GOES-8 and GOES-10 located at the orbital positions 75⁰ West and 135⁰ West longitudes, respectively. NOAA recently replaced the faulting GOES-9 with GOES-10, an orbiting spare, moving it from its stored location at 105⁰ West longitude.

GOES satellites receive command and processed data uplinks from the NOAA command and data acquisition (CDA) facility at Wallops Island, Virginia using frequencies in the 2025-2035 MHz band. The processed data are distributed to client weather facilities located throughout the United States and possessions. Present budgetary plans identify GOES-L and GOES-M, and subsequent series, GOES-N, -O, -P, and -Q, to use the same uplink frequency band at 2025-2035 MHz ***through the year 2015***. In addition, NOAA is developing a backup GOES CDA facility which will also use the 2025-2035 MHz band for command uplink transmissions. This CDA facility will be at Goddard Space Flight Center (GSFC) in Greenbelt, Maryland and will consist of a single earth station with a 16.2 meter antenna. GOES functions likely to be carried out at GSFC are processed data relay, weather facsimile, command, ranging and data collection platform interrogation.

Landsat System

Currently, the Landsat system is composed of Landsat 5 and 7. Landsat 5 was launched in 1984 and continues to operate, acquiring multi-spectral image data for 16 ground stations around the world. The Remote Sensing Act of 1992 authorized the development of Landsat 7 as a follow-on mission. Landsat 7 is completing its final testing and a change in frequency would cause a multi-year launch delay and, hence, a financial burden that would cancel the mission and effectively end the Landsat Program⁹. Landsat 7 is scheduled for launch in late March 1999, and is designed for a six year mission life.

⁹ Facsimile from Jim Ellickson, NOAA Landsat 7 Manager, NASA, to Ernie Cerezo, NTIA, Subject Landsat 5/7 Mission, (September 10, 1998).

TABLE 2-5: OTHER FEDERAL GOVERNMENT SPACE PROGRAMS IN THE 2025-2110 MHz BAND

Space System/Agency	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launch Date	Opn. Life (Yrs) ^a	Description/Function
PIONEER/NASA ^{b, c}	2110-2120	2290-2300	1965-1978	Indef.	Provide data from planetary encounters and comet observation.
VOYAGER/NASA ^c	2110-2120	2290-2300	1977	Indef.	Provide data from planetary encounters.
Earth Radiation Budget/NASA	2106.4	2287.5	1984	14+	Study processes related to Earth's climate.
ISEE/NASA	2040	N/A	1985	N/A	This is a high Earth-orbit system that studies solar physics.
San Marco D/L/NASA	2025-2110	2200-2290	1988	N/A	Investigate charged and neutral particles.
Galileo/NASA	2025-2110	2290-2300	1989	10+	Study atmosphere, magnetosphere and satellites of Jupiter.
Cosmic Background Explorer/NASA	2106.4	2287.5	1989	N/A	Explore and study diffuse radiation of cosmic origin.
Gamma Ray Observatory/NASA	2106.4	2287.5	1990	6+	Study various sources of gamma rays (Leo System).
Upper Atmosphere Research/NASA	2106.4	2287.5	1991	N/A	Perform extensive studies of the properties of the Earth's upper atmosphere between 20 km and 120 km.
Extreme Ultraviolet Explorer/NASA	2106.4	2287.5	1994	2+	Surveys the entire celestial sphere in extreme ultraviolet spectrum.
MICROLAB /NASA	2092.59	2272.5	1994	4+	Circular orbit-optical transient detector. University Corporation for Atmospheric Research

^a Operational life expectancy of a space system, in years. It should be noted that most satellites can be expected to operate well beyond their design or operational life if proper and sufficient station keeping is accomplished. Where there is a plus sign next to the number of years, this implies that the operation is still continuing or could be activated in the future.

^b NASA is still communicating with PIONEER

^c This system has the capability to operate at the edge of the band and uses a wide bandwidth which goes below 2110 MHz.

**TABLE 2-5: OTHER FEDERAL GOVERNMENT SPACE PROGRAMS IN THE 2025-2110 MHz BAND
(Con't)**

Space System/Agency	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launch Date	Opn. Life (Yrs) ^a	Description/Function
SEA WIFS (SeaStar)/NASA	2025, 2093.054 2090.59	2287.5	1994	10	Provide measurable data to enable calculations of the viability of ocean chlorophyll.
X-Ray Timing Explorer/NASA	2106.4	2287.5	1995	5	Study X-ray sources.
HETE/NASA	2092.133	2272.5	1995	3+	Measures Ultraviolet, X-ray and Gamma radiation.
Mars Pathfinder/NASA	N/A	N/A	1996	2+	Study Mars surface and launch support.
Mars Global Surveyor/NASA	N/A	N/A	1996	2+	Surveys the planet Mars.
TOMS - EP/NASA	2087.5- 2095	N/A	1996	4	Free flying spacecraft and the total ozone mapping spectrometer instrument
CRAF - Cassini/NASA	2040-2097	2298.33- 2299.074	1997	11	Interplanetary mission.
TRMM/NASA-NASDA	2076.94	2255.5	1997	3	Integral part of the mission to Planet Earth Program under Earth probe series.
SNOE (STEDI)/NASA	2092.96	2272.9	1997	2+	Measure Nitric Oxide in terrestrial lower atmosphere and inputs from Sun and magnetosphere.

^a Operational life expectancy of a space system, in years. It should be noted that most satellites can be expected to operate well beyond their design or operational life if proper and sufficient station keeping is accomplished. Where there is a plus sign next to the number of years, this implies that the operation is still continuing or could be activated in the future.

**TABLE 2-5: OTHER FEDERAL GOVERNMENT SPACE PROGRAMS IN THE 2025-2110 MHz BAND
(Con't)**

Space System/Agency	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launch Date	Opn. Life (Yrs)^a	Description/Function
ACE/NASA	2097.9806	2278.35	1997	5	Determine and compare the element and isotropic composition of several distinct samples of matter.
EQUATOR - 2/NASA-DARA *	2284.5	2103.6	1997	2+	High resolution plasma, magnetic and electric field measurements.
AXAF - 1/NASA	2071.875	2250	1998	10	Study the universe age and size.
FUSE/NASA	2065-2072.5	2249	1998	5	Obtain high resolution spectrum in far ultraviolet wavelength
Polar-Orbiting Satellite/NOAA	2026.0	2247.5	1998	3	Collecting weather information and climatology.
HELIOS-1A & 1B/NASA-ESA*	2022-2040	2200-2220	1994/1A 1999/1B	5 5	Polar-orbiting remote sensing data.
MAP-MIDEX/NASA	2035-2042.5	N/A	1999	2	Conduct space sciences investigation in Explorer Program using scientific payloads.
Medium-Class Explorer (MIDEX)/NASA	N/A	N/A	1999	N/A	Three-dimensional imaging techniques to study the global responses of the Earth's magnetosphere to variation in solar winds.
Microwave Anisotropy Program (MAP)/NASA	2090.66	2270.42	2000	N/A	Probe conditions in the early universe measuring temperature difference in cosmic microwaves.
CLUSTER/NASA	2077.4	2256	2000	N/A	N/A
Gravity Probe-B/NASA	2102.5-2110	2287.5	2000	1.5	Directly measures the motion of local inertial space with respect to distant inertial space.

* **Legend:** **ESA- European Space Agency** **NASDA- Japanese Space Agency** **DARA- German Space Agency**

^a Operational life expectancy of a space system, in years. It should be noted that most satellites can be expected to operate well beyond their design or operational life if proper and sufficient station keeping is accomplished. Where there is a plus sign next to the number of years, this implies that the operation is still continuing or could be activated in the future.

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Landsat 7 will continue a systematic imaging of the Earth that began in 1972. It will collect a global archive of multi-spectral images, by acquiring imagery of about one-quarter of the Earth's land surface every 16 days. These data will be available to the public at a greatly reduced price, compared to past Landsat data and current United States and foreign commercial systems. Data will be distributed from the U.S. Geological Survey/Earth Resource Observation System (USGS/EROS) Data Center operated by DOI. These data will be used for global monitoring of agriculture, forestry, and range resources, land use and mapping, geology, water resources, coastal resources, urban change and planning, environmental monitoring and assessment, and other uses.

Both Landsat satellites require the use of the 2106.4 MHz for uplink commands for their normal operations. These command data are sent either by the ground stations or by NASA's TDRSS satellites.

Polar-orbiting Operational Environmental Satellites

NOAA and NASA have jointly developed a valuable series of polar-orbiting Earth environmental observation satellites since 1978. These satellites provide global data to NOAA's short and long-range weather forecasting systems. The system consist of two polar-orbiting satellites known as the Advanced Television Infrared Observation Satellites (TIROS-N). Operating as a pair, these satellites ensure that environmental data, for any region of the Earth, are no more than six hours old. These satellites have not only provided cost-effective data for every immediate and real needs but also for extensive climate and research programs. The weather data has afforded both convenience and safety to viewers throughout the world. The satellites also support the Search and Rescue Satellite Aided Tracking (SARSAT) part of the COSPAS-SARSAT constellation. The COSPAS is the Russian space system for the search of vessels in distress.¹⁰

NOAA-K, launched on May 13, 1998 and now called NOAA-15, is the latest in the Advanced TIROS-N series. The spacecraft will continue the provision, as a polar-orbiting platform, to support the environmental monitoring instruments for imaging, and measurements of the Earth's atmosphere, its surface, and cloud cover, including Earth radiation, atmospheric ozone, aerosol distribution, sea surface temperature, vertical temperature and water profiles in the troposphere; measurement of proton and electron flux at orbit altitude, and for SARSAT. Additionally, NOAA-15 is the first in the series to support dedicated microwave instruments for the generation of temperature, moisture, surface and hydrological products in cloudy regions where visible and infrared instruments have decreased capability.¹¹ Construction of three new antenna systems have been completed at Fairbanks, AK to support the polar-orbiting environmental satellites.

¹⁰ NOAA/NASA Publication, NOAA-K, NP-1997-12-052-GSFC, (1997).

¹¹ *Id.*

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Tracking and Data Relay Satellite System (TDRSS)

The TDRSS is a NASA system developed to reduce the cost and improve the efficiency of returning spacecraft-gathered scientific data to Earth. In addition, real-time coverage low earth-orbit (LEO) satellites can be provided on a more complete basis, as compared to the previous network of U.S. earth stations which can support a given space mission for about 15 percent of the time due to visibility constraints. The TDRSS was principally designed to provide communication links between LEO spacecraft, including the Space Shuttle, and earth stations via geostationary satellites. It is an integral part of NASA's Spaceflight Tracking and Data Network (STDN).

The TDRSS at full operation can track up to 26 satellites at a time and will consist of six geostationary tracking and data relay satellites (TDRS); five operational satellites located at 41⁰ West, 62⁰ West, 79⁰ West, and 171⁰ West longitudes and one in-orbit spare; and an earth station at White Sands, New Mexico. The first satellite, TDRS-East or TDRS-1, was launched in 1983 and positioned at 41⁰ West longitude. A second satellite was lost with the Space Shuttle Challenger in 1986, but was replaced. In 1988, TDRS-3 was launched and placed at 171⁰ West longitude to work in tandem with TDRS-1. The TDRS-3 allows mission control to stay in near-continuous contact with the Shuttle crews and other low-orbit satellites. Because of the importance in improving communications with future Shuttle crews, NASA launched another satellite (TDRS-4) in 1989. Described as the most complex non-military communications satellite, the TDRS-4 has dramatically improved communications with LEO spacecraft, in particular, the Space Shuttle. Another satellite, TDRS-5, was launched in 1991 as a possible replacement for either TDRS-1 or TDRS-3. NASA augmented the TDRSS to enhance its capacity with the increase in the number of satellites (46⁰ West and 174⁰ West) and the addition of a second earth station at White Sands, NM. Again, in 1992, NASA requested the Spectrum Planning Subcommittee (SPS) of the IRAC for two more additional geostationary orbit location for TDRSS (107⁰ West and 85⁰ East) as a response to the technical difficulties with the Gamma Ray Observatory (GRO) satellite regarding data transfer and planned to move one of the earth stations at White Sands, New Mexico to Guam. All of these added TDRSS and earth station will use the 2025-2120 MHz and 2200-2300 MHz bands. A follow-on TDRSS, consisting of TDRS-H, I and J, is pending approval for operational use by the NTIA certification process. Eventually, the new TDRSS will be phased-in to replace all the original TDRSS satellites as their useful lifetimes are realized or as increases in capacity is needed for mission support. All follow-on TDRSS satellites will require access to the 2025-2110 MHz band for their orbital lifetimes.

TABLE 2-6: CURRENT FOREIGN SPACE PROGRAMS BEING SUPPORTED BY THE UNITED STATES

Space Programs/ Administration or Space Agency	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launch Date	Opn. Life (Yrs) _a	Description/Function
ROSAT/DARA	2096.27	2276.5	1990	N/A	Study individual X-ray & perform general X-ray survey.
TOPEX-Ocean Topography Experiment-Poseidon/CNES	2040.943	2215.922	2000	5	Joint U.S./France mission for oceanographic data collection. JASON is a follow-on to TOPEX.
ADEOS-2/NASDA-NASA	2027.5- 2102.5	N/A	1996	6	N/A
SPOT (SPOT 4&5)/CNES	2027.5- 2080	N/A	1998	5	Earth observation and development qualification of a multi- mission platform.
COMETS/NASDA	2075	2295.5	1995	5	Commercial experiment transporter.
METOP/EUMETSAT	2050- 2057.5	2230	2003	3-5	Polar-orbiting meteorological system that will function with future NOAA NPOESS system.
RADARSAT -1A/Canada	2053	2130	1995	6	Radar survey of Antarctica.
International Solar Terrestrial Physics-SOHO/ESA, Japan	2065-2095	N/A	1995	2.5+	Collaborative solar-terrestrial research.

Legend: EUTELSAT- European Telecommunication Satellite ESA - European Satellite Agency
EUMETSAT- European Meteorological Satellite CNES - National Space Agency of France
DARA - German Space Agency NASDA - Japanese Space Agency

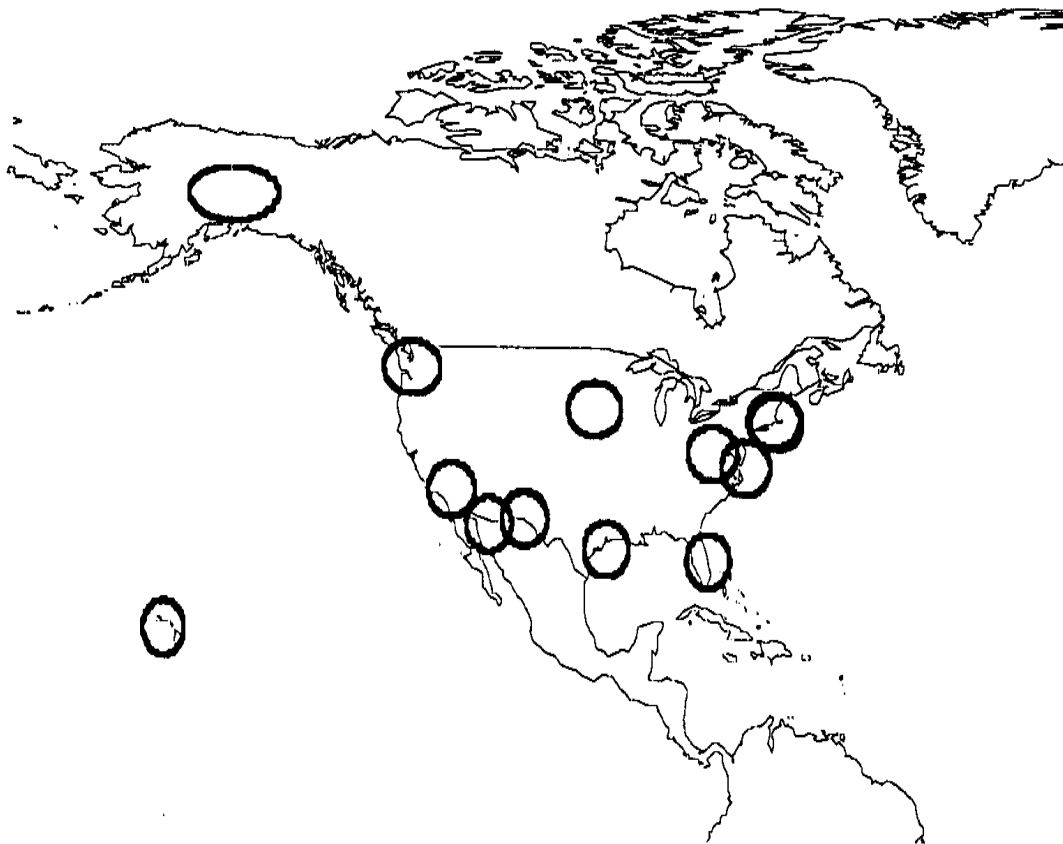
^a Operational life expectancy of a space system, in years. It should be noted that most satellites can be expected to operate well beyond their design or operational life if proper and sufficient station keeping is accomplished. Where there is a plus sign next to the number of years, this implies that the operation is still continuing or could be activated in the future.

**TABLE 2-6: CURRENT FOREIGN SPACE PROGRAMS BEING SUPPORTED BY THE UNITED STATES
(Con't)**

Space Programs/ Administration or Space Agency	Uplink Freq. (MHz)	Dnlink Freq. (MHz)	Launc h Date	Opn. Life (Yrs) _a	Description/Function
SAC-B/Argentina-CNES	2076.9	2255.5	1996	3+	Observe solar flares with instrument to measure the X-ray time profile of gamma ray burst.
HOTBIRD3,4,&5/ EUTELSAT	2090.51	2270.58	1998	12	N/A
ISO/ESA	2087.6	2266.5	1995	2+	Provide spectroscopic, photometric imaging and polarimetric observations.
LUNAR -A/NASDA	2081.1	2059.91	1999	1+	Launch and early orbit-trans lunar.
STRV-1A &1B/ United Kingdom	2093.75	2273	N/A	N/A	N/A
ULYSSES/ESA	2111.6072	2293.1481	1990	N/A	Formal ISPM sun and polar orbit (EOL still working).
DORIS/CNES	2036.25	401.25	N/A	N/A	Beacon earthquake-tracking polar orbit.
PEACESAT/Pacific Countries	2025-2033	1683-1691	N/A	N/A	Uses GOES-3 Satellite. Department of Commerce experiment on cultural and educational ventures.

Legend: EUTELSAT - European Telecommunication Satellite ESA - European Satellite Agency
EUMETSAT- European Meteorological Satellite CNES - National Space Agency of France
NASDA - Japanese Space Agency

^a Operational life expectancy of a space system, in years. It should be noted that most satellites can be expected to operate well beyond their design or operational life if proper and sufficient station keeping is accomplished. Where there is a plus sign next to the number of years, this implies that the operation is still continuing or could be activated in the future.



Note: 1) The figure only illustrates the general sites of the earth stations in the United States.

2) The circles do not represent the interference areas, an interference coordination contour is provided for each of the earth station in annexes A-1 through A-15.

Figure 2-6.
A pictorial representation of existing NASA and NOAA earth stations in the United States.

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Spaceflight Tracking and Data Network (STDN)

NASA operates and maintains a worldwide system of ground stations to provide tracking, telemetry, and command to all authorized user spacecraft missions. The set of ground stations presently supporting the low-Earth orbit spacecraft, together with the communication links connecting NASA centers with the ground stations, is referred to as the STDN. In the 1980's, the TDRSS was added to the STDN. With this addition, the STDN provided the increased support required by user missions. A key benefit of the STDN in the TDRSS era is that data flow between mission spacecraft and user ground station facilities is in real time.

TABLE 2-7: NASA AND NOAA EARTH STATION SITES

Site	Agen.	Lat. ^o (North)	Long. ^o (West)	Site	Agen.	Lat. ^o (North)	Long. ^o (West)
Goldstone, CA	NASA	35.34	116.92	Wallops Is. VA	NOAA	37.95	075.46
Merritt Is., FL	NASA	28.51	080.69	Fairbanks, AK	NOAA	64.97	147.52
STGT, NM	NASA	32.54	106.61	Honolulu, HI	NOAA	21.35	157.88
WSGT, NM	NASA	32.50	106.61	Sioux Falls, SD	NOAA/ DOI	43.53	096.76
Houston, TX	NASA	29.54	095.06	Seattle, WA	NOAA	47.57	122.55
Kitt Peak, AZ	NASA	31.95	111.62	Greenbelt, MD*	NOAA	39.00	076.84
Westford, MA	NASA	42.62	071.49				
Fairmont, WV	NASA	39.26	080.11				
Boston, MA	NASA	42.35	071.11				
Chantilly, VA	NASA	38.89	080.69				
Poker Flats, AK	NASA	63.13	147.51				

Legend: Agen. - Agency STGT - Second TDRSS Ground Terminal
 Lat. - Latitude WSGT - White Sands Ground Terminal
 Long. - Longitude * - Future GOES earth station

The earth stations operating at eight locations around the world comprise the Ground Spaceflight Tracking and Data Network (GSTDN). These earth stations usually track spacecraft during launch, sub-orbital phases, and in-orbit. Three of the GSTDN ground stations located at

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SUMMARY OF FEDERAL GOVERNMENT SPECTRUM USAGE IN THE 1990-2110 MHz BAND

Goldstone, California; Madrid, Spain; and Canberra, Australia, provide primary support for high and synchronous orbit spacecraft and for the eccentric orbit spacecraft. A fourth GSTDN ground station at Fairbanks, Alaska, supports existing Earth-orbiting spacecraft which are not compatible with TDRSS. Launch support facilities are located at Merritt Island, Florida. The Vandenberg facility is operated by the AF for West Coast launches, while Wallops Island, Virginia, will continue to support a limited number of orbiting research satellites.

Deep Space Network (DSN)

NASA's DSN facilities consist of earth stations located in Spain, Australia and in the United States at Goldstone, California. One technical characteristic that makes these earth stations very different from other earth stations is that they employ very high-powered transmitters (see Annex A-1 for the coordination contour for Goldstone).

Although, the DSN at Goldstone emits a power of up to 500 kW, the highly directive characteristics of the earth station antenna and remoteness of its location reduces the probability of harmful interference to terrestrial services. Normally, DSN uplink operations are conducted in the 2110-2120 MHz but for some missions, especially during emergencies such as when contact with a mission spacecraft is lost, the 2025-2110 MHz band can be utilized in order to command the errant spacecraft.

These DSN facilities support deep space missions using 26-, 34-, 64-, and 70-meter antennas and augment NASA's GSTDN and the Air Force's Space Ground Link Subsystem (SGLS) for certain other missions. In addition, the DSN supports a wide variety of exploration spacecraft and research missions.

National Space Transportation System (Shuttle)

The Space Shuttle is a NASA program designed to support a wide range of scientific, environmental, defense, commercial, and international interests. It is a manned, re-usable space transportation system that could deliver satellites to low-Earth orbit where an upper stage rocket could be used to boost them into a higher-energy orbit. In addition to this launch capability, the Shuttle also carries spacelab payloads, modules, and pallets used to conduct in-orbit experiments from the cargo bay. Five reusable orbital vehicles comprise the Shuttle fleet with flights beginning in the early 1980's.

The 2 GHz communication links for the Shuttle are shown in Figure 2-7. The primary links of interest are the ones emanating to and from the NASA payload, STDN earth station, the TDRSS and the Space Shuttle. Note that the bands 2025-2120 MHz and 2200-2300 MHz are always paired

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in these links. Not shown in the link diagram is the NASA payload communicating with STDN and TDRSS and vice-versa also at 2025-2120 MHz and 2200-2300 MHz bands.

Hubble Space Telescope (HST) System

Launched by the Space Shuttle in 1990, the HST is the first complete observatory in space and will have an expected orbiting lifetime of 15 years. It is an unmanned astronomical observatory consisting of a support system module, an optical telescope assembly and a complement of scientific instruments. It is used to probe the secrets of the universe and analyze light sources which cannot be detected by ground-based telescopes. The HST, although unmanned, can be serviced by astronauts during extra-vehicular activity missions and can be returned to Earth for refurbishment. Command signals are transmitted to the Hubble at 2106.4 MHz, whereas housekeeping and some research telemetry data are transmitted by the telescope on 2287.5 MHz and wideband data near 2255.5 MHz on several discrete frequencies. All communications to and from the HST will be through the TDRSS.

International Space Station (ISS)

When fully operational, the ISS will be a multi-purpose facility which will provide the United States with a permanent, manned-orbital facility serving many functions including the following: a national laboratory in space for scientific research, a permanent observatory in space, a servicing facility for various free-flying spacecraft, a transportation node, a manufacturing facility, an assembly facility, and a staging base for space exploration. In addition to Federal Government use, the ISS will also be available for non-government and foreign activities.

When the various space station elements are finally assembled, the main platform, or core, will occupy a low-Earth orbit inclined at 51.6° . The polar-orbiting platform, containing payloads such as remote sensors that do not require frequent servicing from the core, will occupy a Sun-synchronous orbit inclined about 98° . Other elements include the free-flying spacecraft and various orbit transfer vehicles. Telecommunications for the ISS will be provided primarily by many existing NASA frequency resources including the TDRSS and its follow-on systems. The Shuttle will provide primary logistics support. The Global Positioning System is the most likely system to be used in conjunction with the ISS traffic function.

Earth Observing System (EOS)

Part of NASA's Earth science enterprise is the EOS Program. This system will consist of a series of satellites for extended space-based studies of the Earth and its environments as an integrated system. The EOS AM, PM, CHEM and LAM spacecraft will observe how the Earth is changing both

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naturally and as a result of human activity by obtaining measurements of the atmosphere, oceans, land surfaces, polar regions and solid Earth. Separate EOS platforms will host a compliment of scientific and remote sensing instruments. These spacecraft utilize the 2025-2110 MHz band through TDRSS. The initial spacecraft (EOS AM-1) is scheduled for launch in June 1999.

FUTURE SPACE PROGRAMS/SYSTEMS in the 2025-2110 MHz BAND

Enumerated in Table 2-8 are NASA's and NOAA's future space programs/systems. Since the majority of these systems are still in their early stages, the description and other information pertaining to these systems are not available at this time. Only the projected launch dates are known. Additionally, as agency funding is secured, new mission program offices will require communications support in the 2025-2110 MHz band. As discussed earlier, NASA's TDRSS H, I, and J will soon be operational and, in the near future, the ISS or at least the first few components of the ISS will be launched. In addition, NOAA's Landsat 7 and GOES series will soon be also launched. Note that, NOAA has indicated that the GOES, specifically the continuation series, will still be operational by the year 2015.

There are over 260 existing and planned worldwide satellite systems in the 2025-2110 MHz band. A complete listing of these worldwide space satellite systems is shown in Annex B. The annex was derived from NASA's data base, as of 1997, which is a compendium of data from the ITU and other sources. Some of the space systems listed in Annex B are still being coordinated or under notification process within ITU (e.g., NASA's TDRSS H, I, and J, EOS Systems) The listing includes the space program or satellite nomenclature and the respective operating administration. Included in this listing are existing and future United States space systems.

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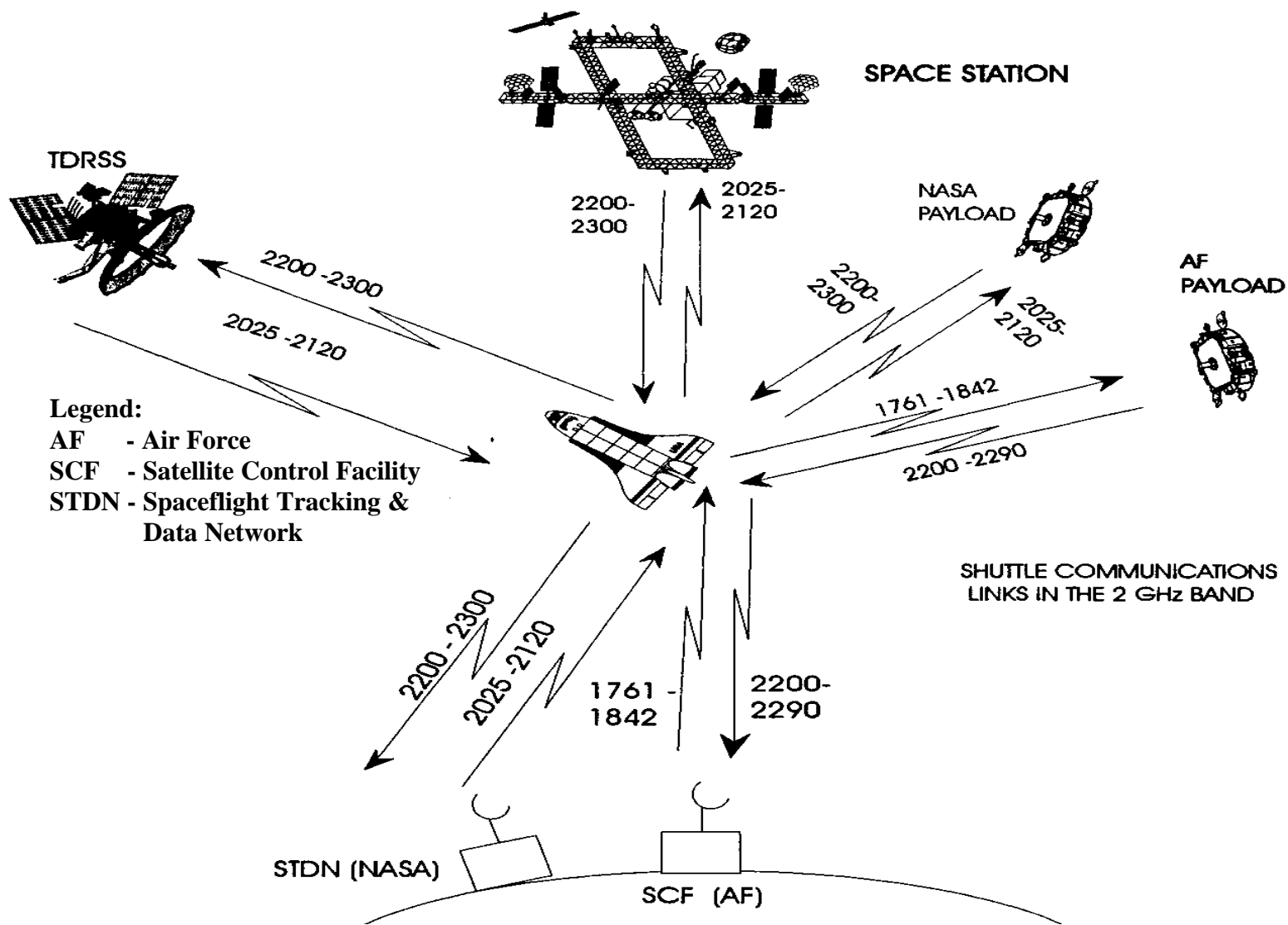
TABLE 2-8: FUTURE NASA AND NOAA SPACE PROGRAMS/SYSTEMS IN THE
2025-2110 MHz BAND ^a

SPACE PROGRAMS/SYSTEMS	# of Satellites	Launch Date
ASTRONOMY (ASTRO)	2	2000 & 2003
CLUSTER	2	2000
EARTH OBSERVING SYSTEM (EOS)	7	1999-2006
ENGINEERING TEST SATELLITES VIII (ETS-VIII)	1	2001
INTEGRAL	1	2001
LONG DURATION BALLOON PROGRAM (LDBP)	1	on-going
MEDIUM CLASS EXPLORER MISSIONS (MIDEX-03)	8	2000-2008
NPOESS ^b	4	2007-2025
SATELITE de APLICACIONES CIENTIFICAS (SAC-C) ^c	1	1999
SMALL EXPLORER MULTI-MISSION PROJECT (SMEX)	7	2004-2010
STARLINK	1	on-going
X-RAY MEASURING MISSION (XMM)	1	1999
INTERNATIONAL SPACE STATION	1	1999
TDRSS H, I, & J	3	1999
LANDSAT 7	1	1999

^a The downlink frequency band for these systems will be in the 2200-2290 MHz band

^b National Polar-orbiting Operational Environmental Satellite System

^c This will be a space joint venture between NASA and Argentina



Note: NASA payloads also communicate with STDN and TDRSS at 2025-2110 MHz and 2200-2300 MHz bands.

Figure 2-7: Communication links between the Space Shuttle and some of the space systems.

SECTION III

RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

INTRODUCTION

This section discusses domestic issues and international agreements dealing with radio spectrum in the 1990-2110 MHz band. Investment costs, as they relate to spectrum issues, are also discussed. Domestic issues encompass those emanating from the Office of the President, the Congress, the FCC, and, by in large, the public. Examples would be those spectrum issues contained in the Balanced Budget Act of 97, which was signed into law by the President and adopted by Congress on August 8, 1997, that are currently being address by both the FCC and NTIA. Other examples are issues introduced in the Commission's published FNPRM regarding the allocation of the 1990-2025 MHz to the MSS. In part, the FCC initiated and acted on the FNPRM because of the private sector's requests for MSS spectrum in the 2 GHz band.

International agreements or treaties include, but not limited to, those that were adopted by the ITU and its study groups and those bilateral or multi-lateral treaties in the United States is a signatory. International agreements, treaties and obligations are usually tied to domestic policy matters. As such, they must be considered if spectrum auctions are to be viable because they affect the potential for new radio services in and outside the United States.

NATIONAL ISSUES

The FCC released the FNPRM to the public for comments on the proposed allocation of spectrum at 2 GHz for use by the MSS, on March 14, 1997. The FCC plans to allocate 70 MHz of spectrum at 1990-2025 MHz and 2165-2200 MHz to the MSS, effective January 1, 2000. In the plan, FCC proposed to modify the current BAS, CARS, and LTTS allocation at 1990-2110 MHz by providing an allocation to these services in the 2025-2130 MHz band. In addition, the FCC proposes to re-channelize BAS at 2 GHz from seven channels with 17 and 18 MHz bandwidths to seven channels of 15 MHz bandwidth.

Another domestic issue in this band is NASA's petition to the Commission. NASA through NTIA submitted a petition to the FCC requesting that the national allocation of the 2025-2110 MHz band be upgraded to primary status in order to bring the U.S. Table of Frequency Allocation in line with that of the international allocation where the space science services are afforded primary status worldwide^{12,13} (*see* Annexes C, D, and E).

¹² Letter from David Struba, IRAC Representative, NASA, to William Gamble, IRAC Chairman, NTIA, (July 19, 1996).

¹³ Letter from William Hatch, Acting Associate Administrator, Office of Spectrum management, NTIA, to Richard Smith, Chief, Office of Engineering and Technology, FCC, requesting primary status for Government operations in the 2025-2110 MHz band, (Feb. 11, 1998) (attached as Annex E).

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INTERNATIONAL AGREEMENTS

International agreements regarding the use of the radio frequency commence, culminate, and are agreed upon at world radiocommunication conferences sponsored by the ITU or in technical recommendations approved by the ITU-R study groups. An administration enters into an agreement when it becomes a signatory of world radiocommunication conferences or signed a bilateral or multi-lateral agreement with other administrations. Agreed-upon documents at ITU conferences may come in the form of approved international radio regulations, recommendations, resolutions, appendices, and articles, as define by the ITU, and thus become a part of the Final Acts of the Conference and part of the ITU Radio Regulations. There are also bilateral or multi-lateral agreements outside the domain of the ITU.

By virtue of these agreements and treaties, cooperation between the United States and other administrations or space agencies in regard to providing support to each other's satellite programs/systems is common. NOAA, for instance, is fulfilling its ongoing international obligation in this band to support the French satellite Doppler Orbitography and Radiopositioning Integrated by Satellite (DORIS). On the other hand, METEOSAT-3 was borrowed from the European Meteorological Satellite (EUMETSAT) by NOAA and used as a temporary gap filler for the GOES project when earlier GOES satellites failed prematurely. Also, NOAA, under international agreement will provide orbital support to the Meteorological Operational (METOP) system, a European satellite that will become part of the future National Polar-orbiting Operational Environmental Satellite Systems (NPOESS). Another example is a space program called the Topography Ocean Experiment (TOPEX)/Poseidon which is a joint mission between NASA and the National Space Agency of France (CNES). NASA provides the satellite and the TOPEX sensors (dual-frequency altimeter, microwave radiometer, laser retro reflector array, and Global Positioning System (GPS) receiver), while CNES provides the Ariene launch and the Poseidon sensors (solid-state altimeter and DORIS tracking system receiver).

At times, agreements only involve the use of geographic areas for earth terminals. Cases like NASA's DSN and Upper Atmosphere Research Satellite (UARS) are examples, where some of the earth stations are in foreign countries such as, Spain, Australia, and England. The use of these earth stations, however, are locally coordinated with regards to NASA's frequency use.

In previous world conferences, the United States has been one of the more active administrations pursuing changes, introducing new documents relating to the efficient use of the radio spectrum, and recommending the type of radio services that would be appropriate in certain frequency bands. Some of the international issues regarding the 1990-2110 MHz band in which the United States played a key role in the negotiation processes are summarized and discussed below.

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RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

1990-2025 MHz Band

The United States has a long-standing commitment to find sufficient spectrum for MSS in the 2 GHz band. At WARC-92, the frequency bands 1980-2010 MHz and 2170-2200 MHz were allocated to MSS for Earth-to-space and space-to-Earth transmissions, respectively, worldwide on a primary co-equal basis with fixed and mobile services with a date of entry into force on January 1, 2005. Prior to the WRC-95, however, a 10 MHz portion of the 1980-2010 MHz band (i.e., the 1980-1990 MHz band) was reallocated to the Personal Communications Services (PCS) in the United States. As a consequence, at the WRC-95, the United States sought more spectrum for MSS and gained a primary Region 2 allocation for MSS (Earth-to-space) in the frequency bands 2010-2025 MHz and 2160-2170 MHz.

Also, at WRC-95, recognizing that the MSS allocations at the 2 GHz needed to be adjusted in order to account for the different regional allocations and access dates, the United States, together with Region 2 administrations, strongly supported for the adoption of Resolutions 716 and 717. Resolution 716 called for, among other things, the consideration of the MSS allocations to the above mentioned bands and the need to facilitate the introduction and future use of the 2 GHz bands by MSS. Resolution 717 called for WRC-97 to review the MSS allocations with a view to harmonize them, including the access dates in the 2 GHz band. These resolutions were adopted.

At the recent WRC-97 conference, the United States again introduced numerous proposals to amend, among other ITU documents, Resolutions 716 and 717, and Article 5 to complete the harmonization needed in the 2 GHz for MSS. These proposals ensure that there would be compatible operations between MSS and other radio services. Further, the proposals took into account the planned date to bring into use the IMT-2000 technology, and promote the goal of the World Telecommunications Policy Forum and the Global Mobile Personal Communications by Satellite. As a result of WRC-97, the MSS allocations in Region 2, including the United States, and the MSS allocation in the rest of the world have been harmonized in the years 2000 and 2007, respectively.

2025-2110 MHz Band

As a result of WARC-92, the international allocations for space services in the 2 GHz bands, specifically the 2025-2110 MHz band paired with the 2200-2290 MHz band, were elevated to primary status worldwide. However, in the U.S. Table of Frequency Allocations, although the 2200-2290 MHz band is now primary, the 2025-2110 MHz band is still designated to space science services on a secondary basis. In 1998, NTIA submitted a petition to the FCC requesting that the national allocation of the 2025-2110 MHz band be upgraded to primary status in order to bring the National table of frequency Allocation in line with that of the international allocation where the space science services are afforded primary status worldwide (*see* Annex E).¹⁴ NTIA's petition attempts

¹⁴ *Id.*

SECTION III

RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

to reconcile the differences between the domestic and international allocations. Specifically, the petition proposes to modify the U.S. Table of Frequency Allocations to add space research, space operations and Earth exploration-satellite services in the 2025-2110 MHz band for Earth-to-space and space-to-space transmissions on a primary basis.

The 2025-2110 MHz band has many international agreements associated with space sciences services negotiated by the United States. For example, the United States has negotiated NASA's rights of use in the 2 GHz band for over 35 years at five international conferences. At WARC-92, the United States proposals were fundamental to the allocation of Earth-to-space and space-to-space transmissions in the 2025-2110 MHz band on a primary basis for the space operation, space research, and Earth exploration-satellite services. Also, between WARC-92 and WRC-97, the technical body of the ITU study groups (ITU-R) addressed sharing studies between terrestrial systems and space science services in this band. The ITU Resolution 211 and three sharing recommendations (ITU-R SA.1154, ITU-R F.1247, and ITU-R F. 1248) described briefly below resulted from these studies and were approved at the ITU conferences. Further, at the WRC-97, the United States proposed to modify the provisions of Article S5.391, which referenced Resolution 211, in order to take into account the results of Recommendation ITU-R SA.1154. As a result, the International Footnote S5.391, also described below, has been added to the International Table of Frequency Allocations addressing Resolve 1 of Resolution 211.

ITU Resolution 211

Resolve 1 of Resolution 211 (WARC-92), use by the mobile service of the frequency bands 2025-2110 MHz and 2200-2290 MHz, invites the ITU-R to develop appropriate provisions to protect the space services operating in the bands 2025-2110 MHz and 2200-2290 MHz from harmful interference from emissions by stations of the mobile service. The ITU-R has completed its task on this issue and, as a result, adopted Recommendation ITU-R SA.1154.

Recommendation ITU-R SA.1154

Recommendation ITU-R SA.1154 specifically addresses the provisions to protect the space science services and enables mobile service to share the 2025-2110 MHz and 2200-2290 MHz bands with the space science services. This recommendation sets forth the levels of acceptable interference to the stations in the space science services from the emissions of mobile system. Similarly, it provides the technical and operating characteristics of mobile systems that will not cause the aggregate interference to the stations of the space science services to exceed acceptable levels. Mobile electronic news gathering (ENG) systems are representative of compatible mobile systems. More importantly, Recommendation ITU-R SA.1154 determined and confirmed earlier study results that sharing between space sciences and high density and even conventional, mobile systems is not

SECTION III

RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

feasible. Further, the introduction of such mobile systems in the above mentioned bands may preclude the continued operation of space science services.

Recommendation ITU-R F.1247

Recommendation ITU-R F.1247 addresses the technical and operational characteristics of systems in the fixed service (FS) to facilitate sharing with the space research (SR), space operation (SO) and Earth exploration-satellite (EES) services (collectively, space science services) operating in the bands 2025-2110 MHz and 2200-2290 MHz bands. This recommendation considers, among other things, that space science services have operated satisfactorily for many years with the FS in these bands but, should large numbers of FS systems be introduced, it will be important to identify preferred FS technical characteristics to ensure long term compatibility.

Recommendation ITU-R F.1248

This recommendation addresses the limiting interference to satellites in the space science services from the emissions of trans-horizon radio-relay systems in the 2025-2110 MHz and 2200-2290 MHz bands. It considers some issues that include the difficult sharing conditions with trans-horizon radio-relay systems and urges administrations to keep to a minimum the number of trans-horizon systems in certain bands, including the bands 2025-2110 MHz and 2200-2290 MHz, and that limits on the emissions of trans-horizon radio relay systems are required to prevent harmful interference to space science services operating in these bands.

International Footnote S5.391

In making assignments to the mobile service in the bands 2025-2110 MHz and 2200-2290 MHz, administrations shall not introduce high-density mobile systems, as described in Recommendation ITU-R SA.1154, and shall take this Recommendation into account for the introduction of any other type of mobile system

One of the studies indicated that the introduction of high density terrestrial transmitters would be a potential source of interference to space science service operations. Recent technical studies by NASA confirm the earlier conclusions that only low-density mobile or fixed systems similar both technically and operationally to the current ENG occupants could be introduced into the band.

Another issue supported by the United States at the WRC-97 was the suppression of Resolution 711. This resolution describes the possible reallocation of frequency assignments to certain space missions from the 2 GHz band to bands above 20 GHz. This is because of the wealth of study that has taken place since WARC-92 which indicated that the spectrum around 2 GHz, including the 2025-2110 MHz band, is required for satellite use.

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RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

OTHER INTERNATIONAL AGREEMENTS

In addition to ITU, there are other international organizations in which the United States made agreements regarding this band. Some of these are: the World Meteorological Organization (WMO); the Interagency Tracking, Communications, Operations Panel (ITCOP); the Space Network Interoperability Panel (SNIP); the Space Frequency Coordination Group (SFCG); and the Consultative Committee on Space Data Systems (CCSDS). Numerous international agreements have evolved concerning worldwide use of the 2025-2110 MHz band. For example, this band has been adopted by civil space agencies worldwide as the primary space uplink communications band. Some of the more current and significant agreements are listed in Table 3-1. Table 3-1 includes a brief description of each.

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RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

TABLE 3-1: INTERNATIONAL AGREEMENTS RECOGNIZED BY THE UNITED STATES PERTAINING TO THE 2025-2110 MHz BAND

Document Identification	Int'l Group	Description
Resolution 211	ITU	Invites the ITU-R to develop appropriate provisions to protect the space services operating in the bands 2025-2110 MHz and 2200-2290 MHz from harmful interference from emissions by stations of the mobile service.
Rec. SA.1154	ITU	Addresses the provisions to protect the space science services and enables mobile service to share the 2025-2110 MHz and 2200-2290 MHz bands with the space science services.
Rec. F.1247	ITU	Addresses the technical and operational characteristics of systems in the fixed service (FS) to facilitate sharing with the space research (SR), space operation (SO) and Earth exploration-satellite (EES) services operating in the bands 2025-2110 MHz and 2200-2290 MHz bands.
Rec. F.1248	ITU	Addresses the limiting interference to satellites in the space science services from the emissions of trans-horizon radio-relay systems in the 2025-2110 MHz and 2200-2290 MHz bands.
Article S5	ITU	Radio Regulations: SO, EES, & SR, all have primary allocations for Earth-to-space and space-to-space transmissions.
Article S21	ITU	Power limits for terrestrial and earth stations, and limits of power flux-density from space stations.
Rec. SA.509-1	ITU	Preferred frequencies and bandwidths for manned and unmanned near-Earth research satellites.
Rec. SA.1019	ITU	Preferred frequency bands and transmission directions for data relay satellites.
Rec. SA.1024	ITU	Necessary bandwidths and preferred frequency bands for data transmission from Earth exploration satellites, not including meteorological satellites.
Rec. SA.363-5	ITU	Frequencies, bandwidths and protection criteria for space operation systems.
Rec. 622 (WRC-97)	ITU	Use of the frequency bands 2025-2110 MHz and 2200-2290 MHz by the space research, space operations, Earth exploration-satellite, fixed and mobile services.
	SNIP	S-band communications services and requirements for interoperability.
Rec. 401(3.2.1) B-1	CCSDS	Limitations on Earth-space link power levels.
Rec. 4-3 R2	SFCG	Utilization of the 2 GHz bands for space operations.
Rec. 6-1R4	SFCG	Interference from space-to-space links between non-geostationary satellites to other space systems.
Rec. 6-2 R1	SFCG	Transponder turnaround frequency ratios for category A missions.
Rec. 7-1 R3	SFCG	Transponder turnaround frequency ratios for category A missions.
Rec. 12-5	SFCG	Limitations on Earth-space link power levels.
Res.14-2 R1	SFCG	Protection of space science services from FS interference in the bands 2025-2110 and 2200-2290 MHz.

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RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

15 MHz REALLOCATION IMPACT ON THE 2200-2290 MHz BAND

The 2200-2290 MHz band is the companion downlink band for the 2025-2110 MHz band. Virtually, all the space systems that use the 2025-2110 MHz uplink band also use the 2200-2290 MHz downlink band. NASA specifically uses this band to downlink spacecraft telemetry, and engineering and scientific data to earth stations all over the globe.

There exists a very critical relationship between the uplink and downlink frequency bands used in the 2 GHz bands by NASA and NOAA. In order to acquire and accurately track orbiting spacecraft NASA uses a specific ratio between the up and down links that allows precision doppler tracking of mission range and range-rate information. The frequency band corresponding to the 2025-2110 MHz uplink band is the 2200-2290 MHz downlink band. Almost all mission transponders are designed with this “turn-around ratio” as an integral part of its operation.¹⁵ These transponders, known as Unified S-band (2GHz) transponders, are used on virtually all space science missions because of their low cost, proven reliability, and space qualified nature. The reallocation of 15 MHz in the 2025-2110 MHz band will result in an associated loss of more than 15 MHz of spectrum in the 2200-2290 MHz band for space science use. Figure 3-1 illustrates the bandwidth-use ratio. The figure also shows examples of some frequency pairings between the 2025-2110 MHz and 2200-2290 MHz bands. *Note that the missions listed and frequency pairings depicted in Figure 3-1 are only a partial indication of frequency use in both bands.*

Moreover, NASA has indicated that, finding new spectrum at the 2200-2290 MHz band to be paired with new frequencies is more difficult than at other bands. This is because of existing congestion in the 2200-2290 MHz band and, more importantly, the complex and sensitive use by the DoD, in particular, the channeling plan of the Air Force’s Space Groundlink Subsystem (SGLS). NASA’s current spectrum uses in this band have been negotiated with practically all the Federal agencies; especially, the DoD, over the last few decades and has proven to be compatible.

INVESTMENT/REALLOCATION COSTS

NASA stated that its total current space program investment cost to-date in the 2025-2110 MHz band is about \$42 billion and the total current and projected space program investment is about \$76 billion.¹⁶ These values only include the cost of the major systems that are listed in Table 2-4 and do not take into account all of the other space programs/systems, both current

¹⁵ NASA’s Working Papers on S-Band Workshop, 2025-2110 MHz and 2200-2290 MHz Bands, Goddard Space Flight Center, July 14-15, 1997.

¹⁶ Facsimile from Wayne Whyte, Spectrum Manager, NASA, to William Hatch, Associate Administrator, Office of Spectrum Management, NTIA, Subject: Replacement and Investment Costs (October 16, 1998).

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RADIO SPECTRUM ISSUES IN THE 1990-2110 MHz BAND

and future, that are listed in Tables 2-5 and 2-8. The values also do not include the U. S. expenditures associated with joint space ventures with other space agencies. NOAA's total current space program investment in the 2025-2110 MHz band is about \$5 billion and about \$11 billion in total current and projected space program investment.

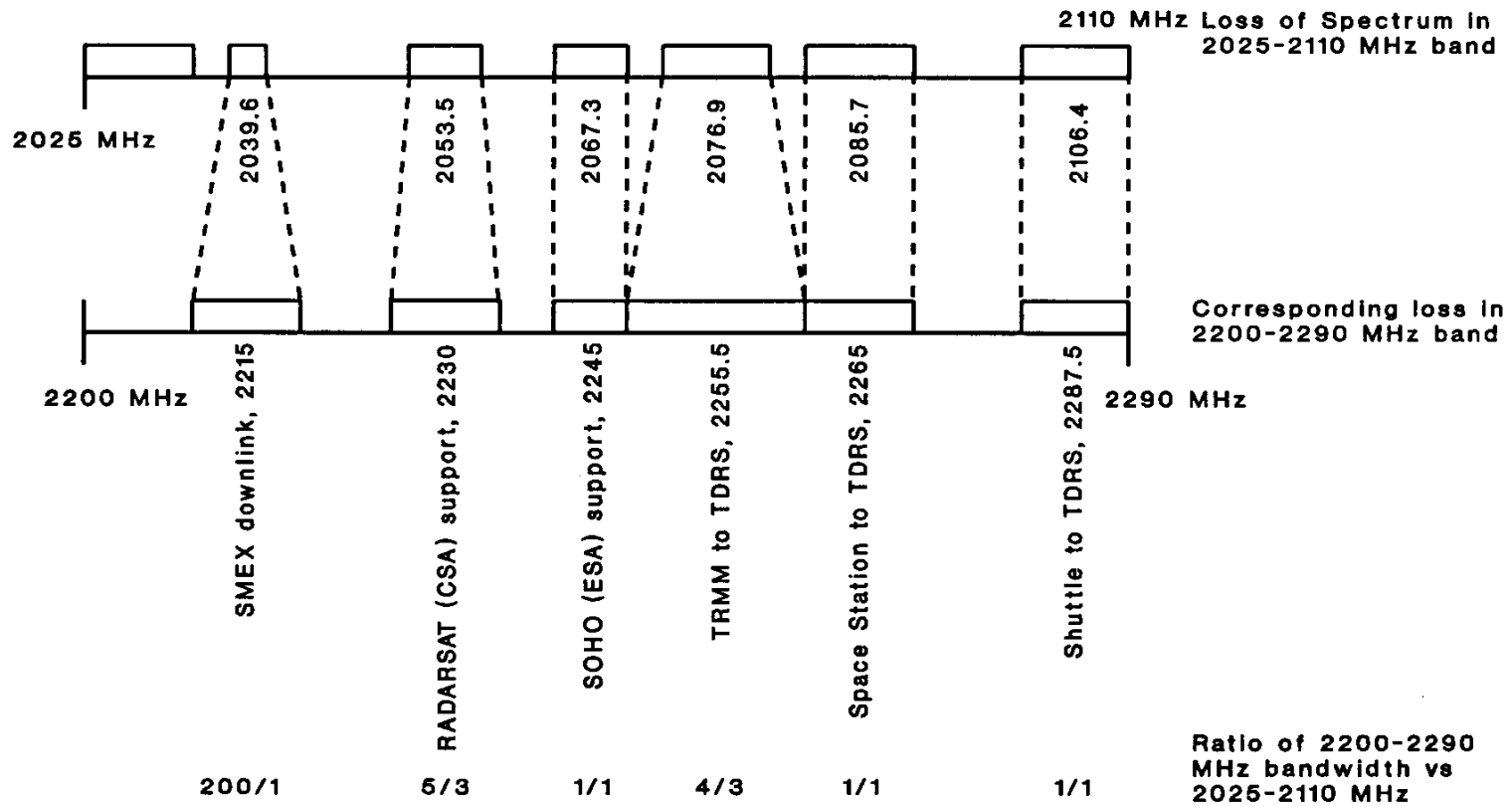
NASA provided a Federal system replacement cost estimate of \$13 billion for relocation purposes.¹⁷ This estimate, however, could only be a portion to the total Federal relocation costs. Reallocation costs of Federal users of the 2025-2110 MHz band have not been specifically assessed in this report since the over all economic impact of such a relocation is directly a function of the following factors: 1) which 15 MHz portion the band is selected for reallocation; 2) when government operations in this portion of the spectrum must cease; and 3) where in the spectrum, the services which were formerly conducted in this 15 MHz, are to be relocated.

To relocate Federal Government operations from the 2025-2110 MHz band to another band would require at least 15-20 years to implement if one is to consider the following: the impact on existing systems; replacement of systems; and other systems awaiting to be implemented. To try to gauge this overall relocation cost, NOAA, which is dwarfed by comparison to NASA's use of the 2025-2110 MHz and the number of spacecraft systems, provided an estimate of \$50-\$100 million for *extra expenditures only* that are not presently envisioned. This cost does not include the value of existing satellites and CDA facilities, and future systems that are being constructed to operate in the band. NOAA also stated that a change in frequency would cause a multi-year launch delay and, hence, a financial burden that would cancel the mission and effectively end the Landsat Program. Further, NASA indicated that, a redesign of the command uplink (2025-2110 MHz band) would be prohibitively expensive at this late date.¹⁸

Therefore, it is safe to assume that the cost to reallocate 15 MHz from the 2025-2110 MHz band could dramatically increase the current Federal Government investment cost in this band segment. A large portion of the cost will be attributed to: research and development, including detailed design and studies needed to identify alternative uplink band; inflation; and systems' cost. The overall cost for such relocation, which is estimated to be in the billions of dollars, would need to be reimbursed to affected Federal agencies.

¹⁷ Letter from Wayne Whyte, Spectrum Manager, NASA, to Ernie Cerezo, NTIA. Subject: Federal System Replacement Cost, (November 2, 1998).

¹⁸ NASA/NOAA Briefing Material to OMB on Use of the Spectrum in the 1990-2110 MHz Band, September 30, 1997.



Note: Missions listed and frequency pairings are only a partial indication of actual frequency use in both bands.

Figure 3-1: An example of frequency pairings in the 2025-2110 MHz and 2200-2290 MHz bands.

SECTION IV
SUMMARY OF THE 15 MHz REALLOCATION IMPACT ASSESSMENT

INTRODUCTION

The impact assessment for reallocating 15 MHz of spectrum from the 1990-2110 MHz band is predicated on the following five key factors: 1) Federal Government band usage; 2) the major systems, including their critical functions or missions, supported in each of the band segments; 3) international agreements, as well as, national issues relating to the 1990-2110 MHz band or portions thereof; 4) the reallocation impact to other bands; and 5) Federal Government investment/relocation costs. A summary of findings by band segment is presented below.

SUMMARY OF FINDINGS

1990-2025 MHz Band

Nationally, the band segment 1990-2025 MHz is essentially unused by the Federal Government. All the Federal Government authorized frequency assignments in the band are experimental in nature and, therefore, are not afforded EMI protection. There are also no major systems operating in this band segment. As such, the Federal Government's investment in this band is minimal. Reallocation of 15 MHz from this band may not have a direct impact on other bands, but, it could impact the FCC's plan for this band. The FCC, as per ET Docket No. 95-18, wanted this band available for MSS. This plan was set in motion when FCC released the First Report and Order and FNPRM to the public for comments, on 14 March 1997, regarding the allocation of the 1990-2025 MHz to MSS.

Internationally, extensive effort has been expended by the United States negotiating for this band to be allocated for MSS for Earth-to-space transmissions. This effort started before the WARC-92 conference and, finally, at the WARC-92 conference, the frequency bands 1980-2010 MHz and 2170-2200 MHz were allocated to MSS for Earth-to-space transmissions worldwide on a co-equal basis with fixed and mobile services with a date of entry into force on January 1, 2005. Again, at WRC-95, the United States sought for more MSS spectrum because a portion of the 1980-2010 MHz band (i.e., 1980-1990 MHz band) was reallocated to the PCS nationally. As a result, the frequency bands 2010-2025 MHz and 2160-2170 MHz were allocated for MSS in Region 2 on a primary basis.

Also, at WRC-95, the United States supported the adoption of Resolutions 716 and 717. Resolution 716 considers, among other things, that the use of the frequency bands 1980-2010 MHz and 2170-2200 MHz in all three regions and 2010-2025 MHz and 2160-2170 MHz in Region 2 is subject to a date of entry into force of 1 January 2000 or 1 January 2005. In addition, Resolution 716

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SUMMARY OF THE 15 MHz REALLOCATION IMPACT ASSESSMENT

also considers the MSS allocations to these bands and resolves to facilitate the introduction and future use of the 2 GHz bands by the MSS. Resolution 717 resolves to review the MSS allocations at the 2 GHz bands with a view to harmonize them. Consequently, at the WRC-95, Resolutions 716 and 717 were adopted.

At the recent WRC-97, the United States again introduced proposals to amend Resolutions 716 and 717, and Article S5 with the purpose of finally harmonizing the MSS (Earth-to-space) allocations and the date of entry into force worldwide so that there would be compatible operations between MSS and other radio services. As a result of WRC-97, the MSS allocation in Region 2, including the United States, and the MSS allocation in the rest of the world have been harmonized in the years 2000 and 2007, respectively.

The United States, being a signatory to previous ITU conferences and other bilateral and multi-lateral treaties with other space agencies, has an obligation to honor adopted international agreements. If the 15 MHz will be reallocated from this band, the future use of this band cannot be guaranteed to be in harmony with the intent of previously adopted international agreements. As such, it could disrupt the implementation of previously adopted international agreements, as well as, those currently being negotiated. Further, it will certainly disrupt FCC's planned activities regarding this band.

2025-2110 MHz Band

Of the two band segments discussed, the 2025-2110 MHz band is the most heavily used by the Federal Government, especially for space sciences services. There are more than 200 Federal Government authorized frequency assignments in this band, as of September 1998. The Federal agencies have indicated that this band will even be more populated in the future for space sciences services. NOAA and NASA are the predominant users of the band. NOAA has about 30 frequency assignments, as of September 1998 and, all, virtually support the GOES, Landsat and Polar-orbiting environmental satellites. These assignments also support other administrations' space programs through NOAA's commitment with the WMO and other international organizations.

NOAA's GOES system has primary allocations, via Footnote US222, and operates in the 2025-2035 MHz portion of this band. This system provides vital services to the public. GOES provides meteorological data information that includes, inter alia, various input parameters that are derived from satellite sensor data for numerical weather prediction models. The Landsat system collects a global archive of multi-spectral images data. These data are used for global monitoring of agriculture, forestry, and range resources, land use and mapping, geology, water resources, coastal resources, urban change and planning, environmental monitoring and assessment. The polar orbiting satellites provide global data to NOAA's short and long-range weather forecasting systems. Specifically, these support the environmental monitoring instruments for imaging, and measurements of Earth's atmosphere, its surface, and cloud cover, including Earth radiation, atmosphere ozone, aerosol distribution and others.

SECTION IV

SUMMARY OF THE 15 MHz REALLOCATION IMPACT ASSESSMENT

NASA has the most frequency assignments (180 assignments as of September 1998) in this band. NASA is one of the prominent leaders in space research activities worldwide and it is common that it share space research ventures with other foreign space agencies. Hence, some of NASA's frequency assignments are used in support of foreign space missions. Although the U. S. footnotes applicable in this band (except for US 222 granting GOES allocation as co-equal with non-government fixed and mobile services) suggest secondary use by Federal Government, NASA's rights of use has been negotiated by the United States at five international conferences over 35 years and its international allocation, which is primary worldwide, holds treaty status.

The 2025-2110 MHz band was first used by NASA to support the Apollo Program in the 1960's. NASA's frequency assignments in this band support major space programs including, but not limited to the following: Space Shuttle; TDRSS; Hubble Space Telescope; MARS Pathfinder; and, in the near future, the ISS; and others, including GOES and international space programs of foreign space agencies.

The 2025-2110 MHz band has many negotiated international agreements by the United States. Some of the most recent ones are discussed in Section III and listed in Table 3-1. One of the negotiated agreements (ITU-R SA. 1154) concerning this band indicates that space sciences services *share well with low density communications systems; whereas, high density systems could render this band useless for the space sciences services*. At the recent WRC-97 conference, the international Footnote S5.391 was modified to state that high-density mobile systems shall not be introduced in this band. Through international negotiations and agreements, this band has been adopted as the primary spacecraft communications band by civil space agencies worldwide that include; Russia, France, United Kingdom, Japan, Germany, Canada, Mexico, ESA, Italy, China, and more than 100 other countries. Thus, the use of this band is coordinated through international organizations like the ITU, SFCG, SNIP, CCSDS, and WMO.

The 2025-2110 MHz uplink band, which is used basically for command and control of spacecraft, has a companion downlink band (i.e., 2200-2290 MHz band). This downlink band is used mainly for telemetry of engineering and scientific data to Earth, and NASA shared this band with virtually all the Federal agencies, particularly with the DoD. NASA has negotiated its current frequency uses in the 2200-2290 MHz band with the DoD over the last few decades. The current frequency pairings between both bands are vital to the successful operations of NASA and other international space systems and have to be maintained because of flexibility constraints in the 2200-2290 MHz band. That is, if portions of the 2025-2110 MHz band will be reallocated, the paired frequencies in the 2200-2290 MHz band will be unusable and finding another set of frequencies in the 2200-2290 MHz band to accommodate NASA's space requirements is essentially next to impossible because of the existing congestion in the band. Further, it could ensue a massive relocation of numerous DoD, as well as other agencies, operations to other bands in order to accommodate NASA in the band.

SECTION IV

SUMMARY OF THE 15 MHz REALLOCATION IMPACT ASSESSMENT

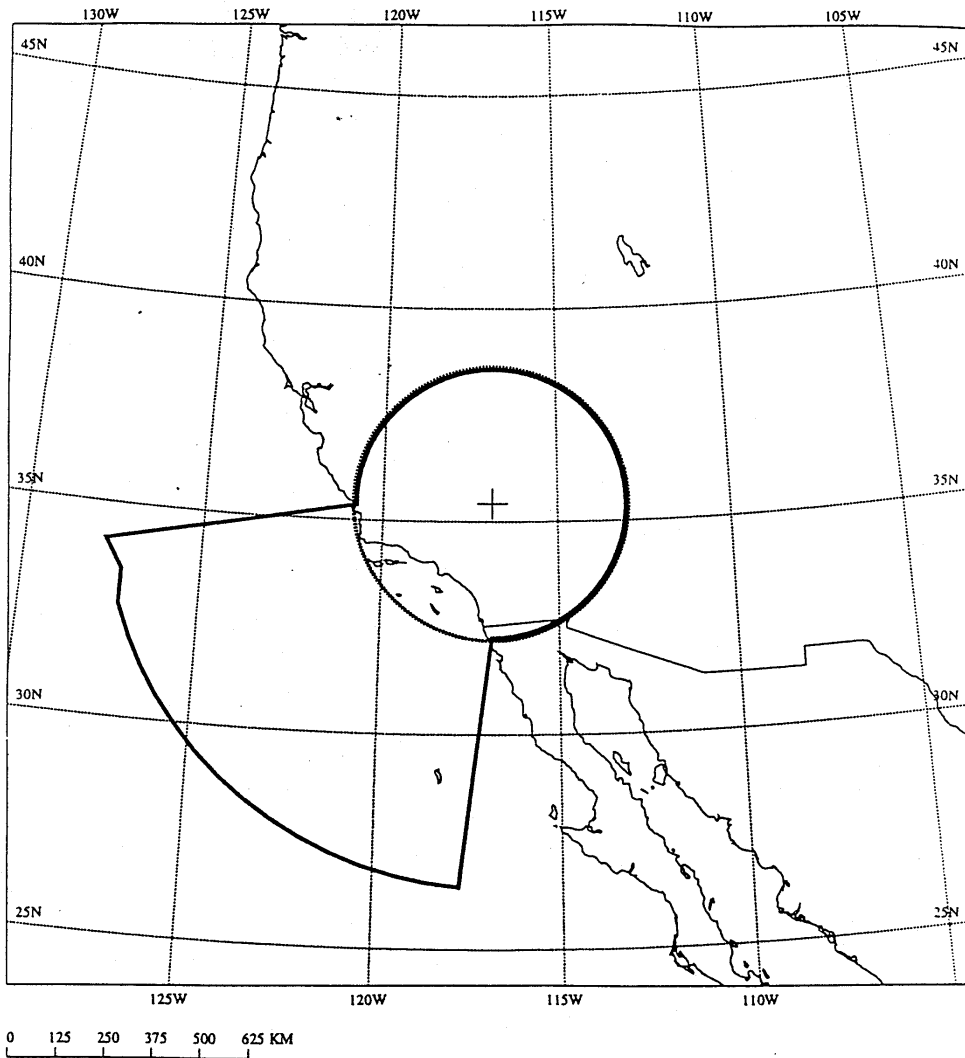
NOAA and NASA have a combined total current investment of about \$46 billion in the 2025-2110 MHz band for their existing spacecraft and satellite systems, along with their respective earth stations. Another \$40 billion is invested in new generations of systems currently being developed to operate in this band. Moreover, there could be also substantial investment in foreign space systems because of joint ventures with other administrations.

Reallocating 15 MHz from this band for competitive bidding would: 1) affect numerous NASA and NOAA operations in the space science services, including safety-of-life operations; 2) create uncertainty as to the type of services that will be employed by future FCC licensees but, more likely generate bidding from high-density wireless communications services which are not compatible with space sciences services in this band. Further, convincing the international community to adopt to future United States uses of this band would entail a very laborious and difficult negotiations; 3) severely impact the space operations in the 2200-2300 MHz band; 4) impact NASA's and NOAA's abilities to support national space science directives and fulfill international agreements; 5) dramatically increase the current investment costs in this band because of detailed new studies and designs, inflation and systems' costs, and extra expenditures, including support to joint space ventures with other administrations; 6) create an immeasurable problem for NASA and NOAA as to what band would their space science operations move to, as well as, what will be the corresponding companion or downlink band, and, more importantly, who will pay for the reallocation costs; and 7) potentially compromise the United States abilities to honor and fulfill its international obligations with respect to space science services.

Furthermore, any changes regarding to space operations in the United States because of the reallocation of 15 MHz from the 2025-2110 MHz band have to be coordinated with the international community for compatibility. Especially, to those administrations whose space programs are being supported by the United States or those administrations that have joint space ventures with the United States in this band. Enforcing these changes, however, with foreign space agencies would be very difficult, specifically if the United States would require them to undergo modifications commensurate to any changes in U.S. space systems' operations to maintain compatibility.

**ANNEXES A-1 THROUGH A-15
COORDINATION CONTOUR OF THE EARTH STATIONS LISTED
IN TABLE 2-7**

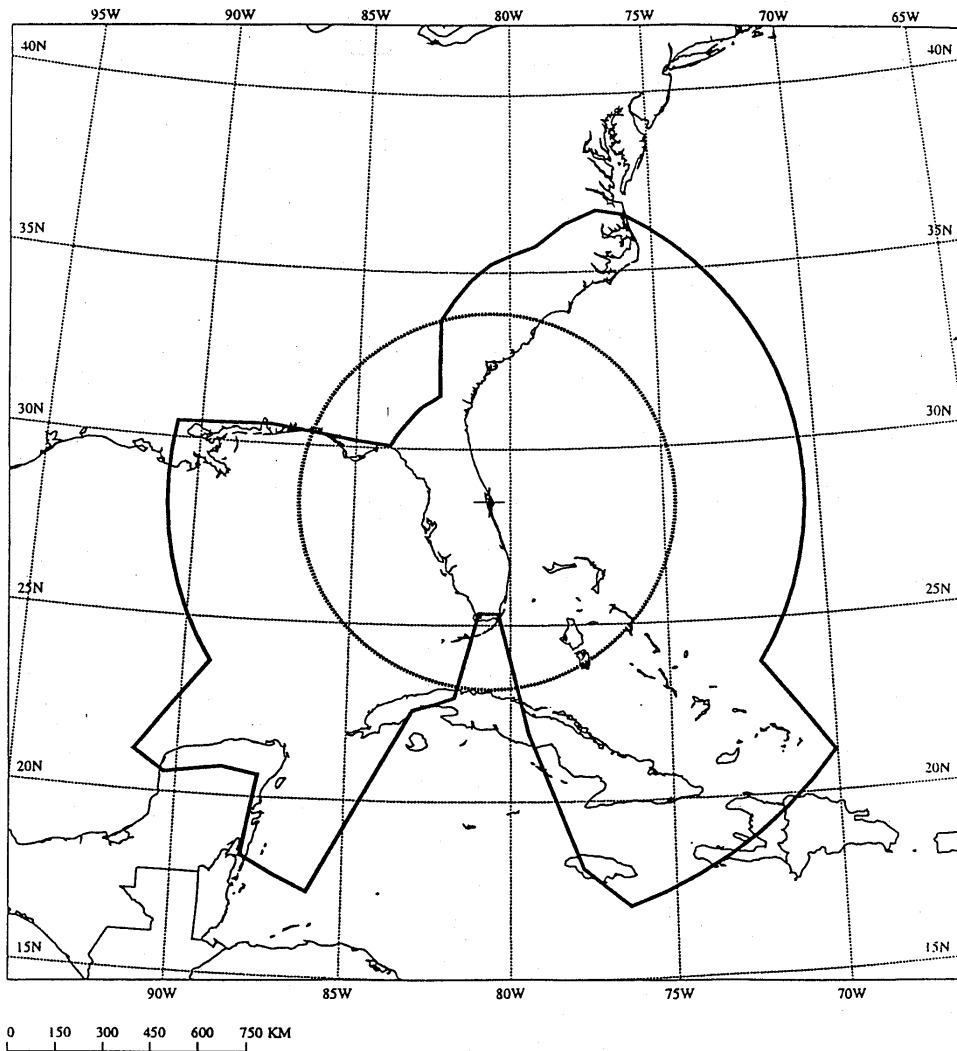
ANNEX A-1



Coordination contour of the earth station in Goldstone, CA.

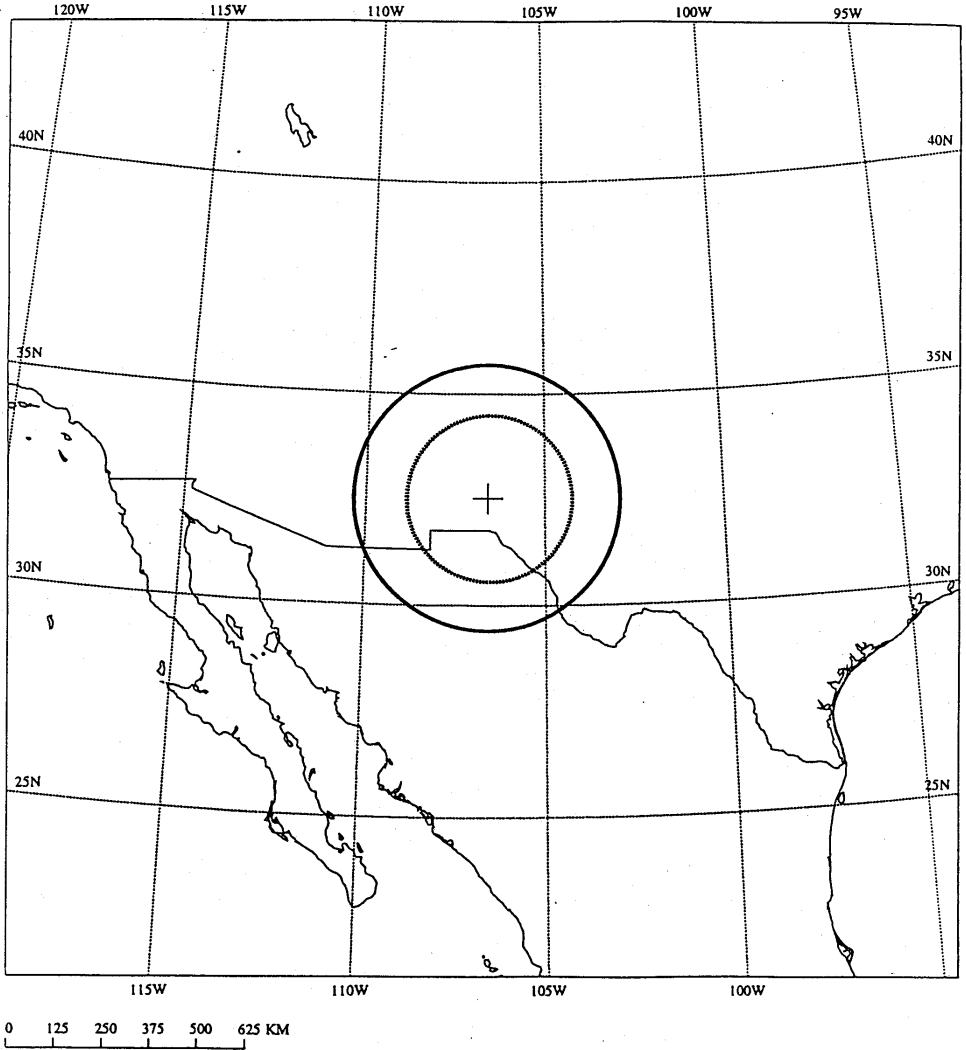
Note: There are two other earth stations (2025-2110 MHz and 2110-2120 MHz bands) within proximity to this station. The contours are similar as above.

ANNEX A-2



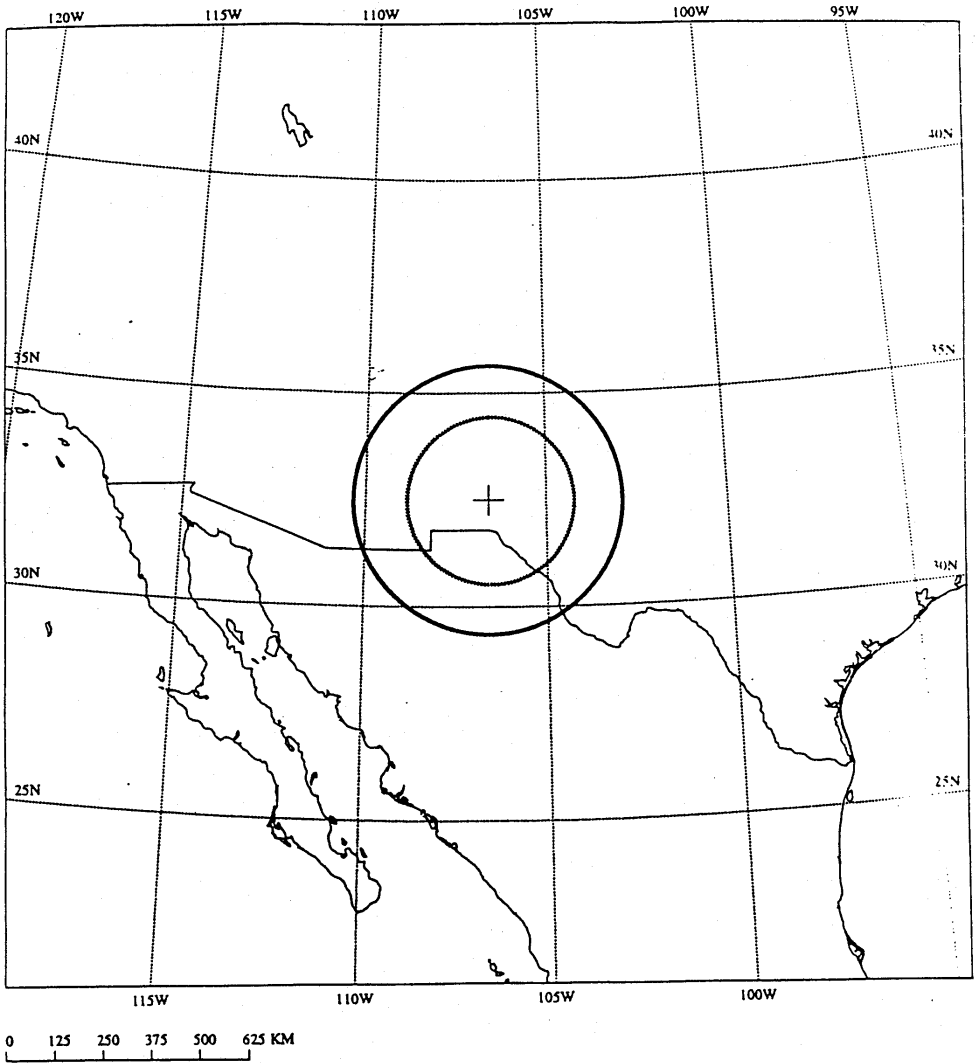
Coordination contour of the earth station in Merrit Is., Florida

ANNEX A-3



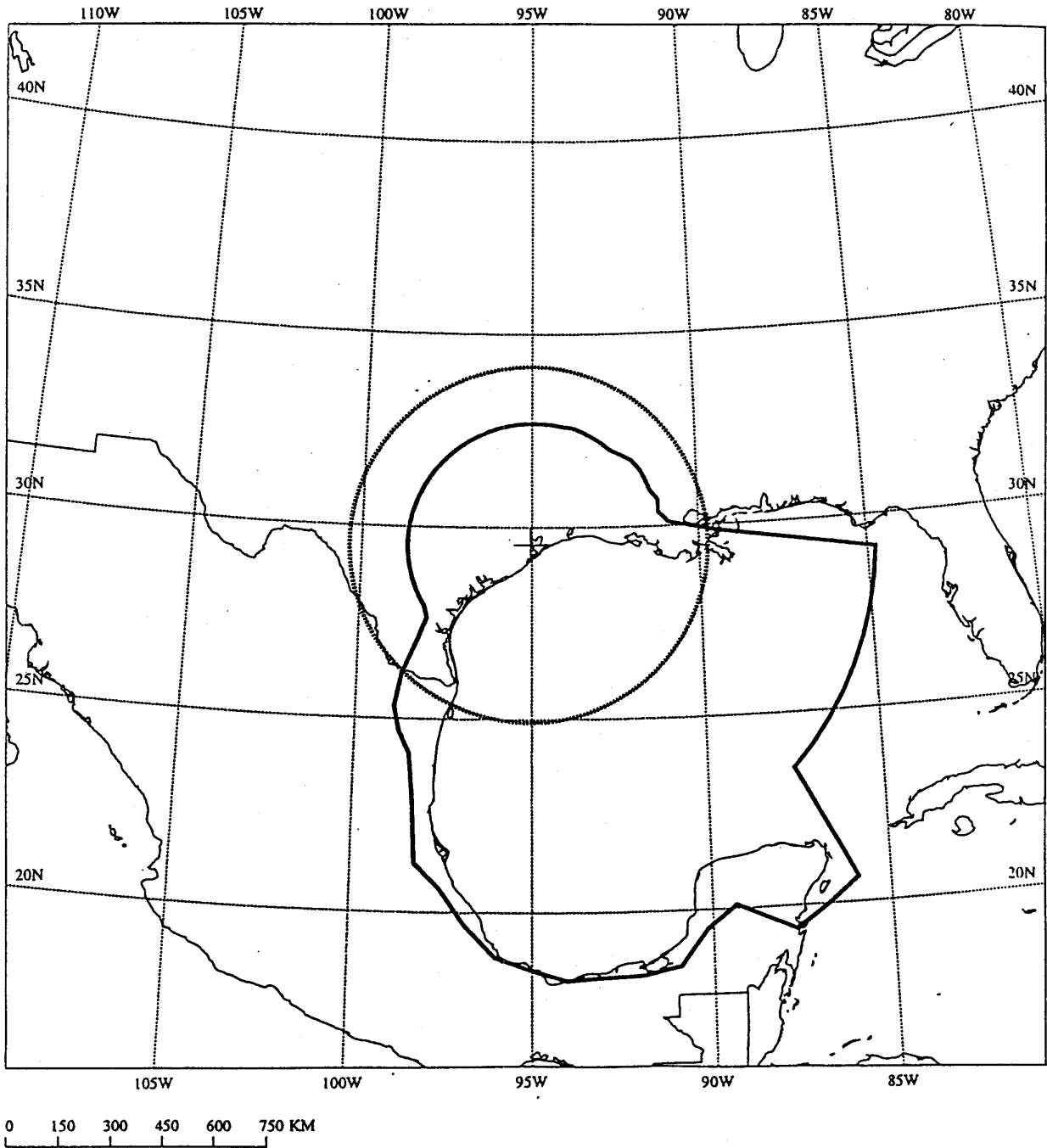
Coordination contour of the second TDRSS ground terminal in White Sands, New Mexico

ANNEX A-4



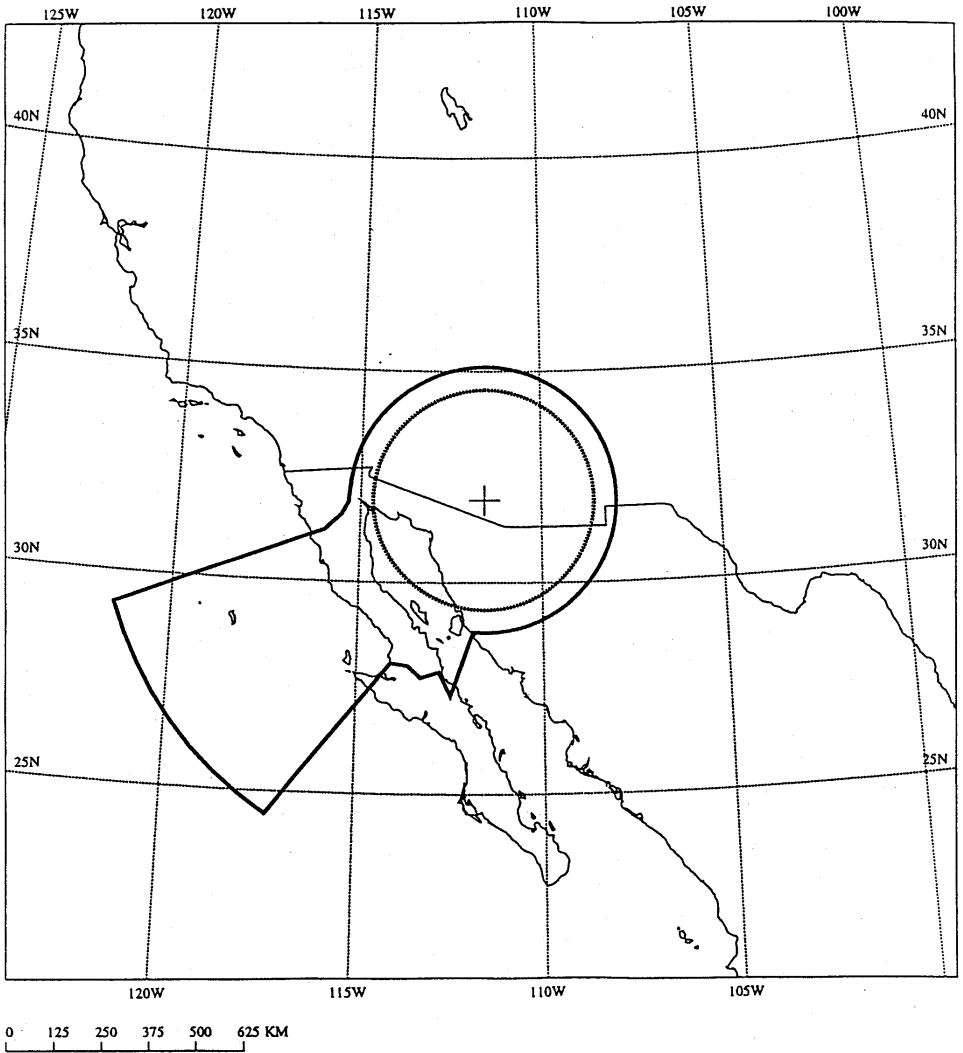
Coordination contour of the ground terminal in White Sands, New Mexico

ANNEX A-5



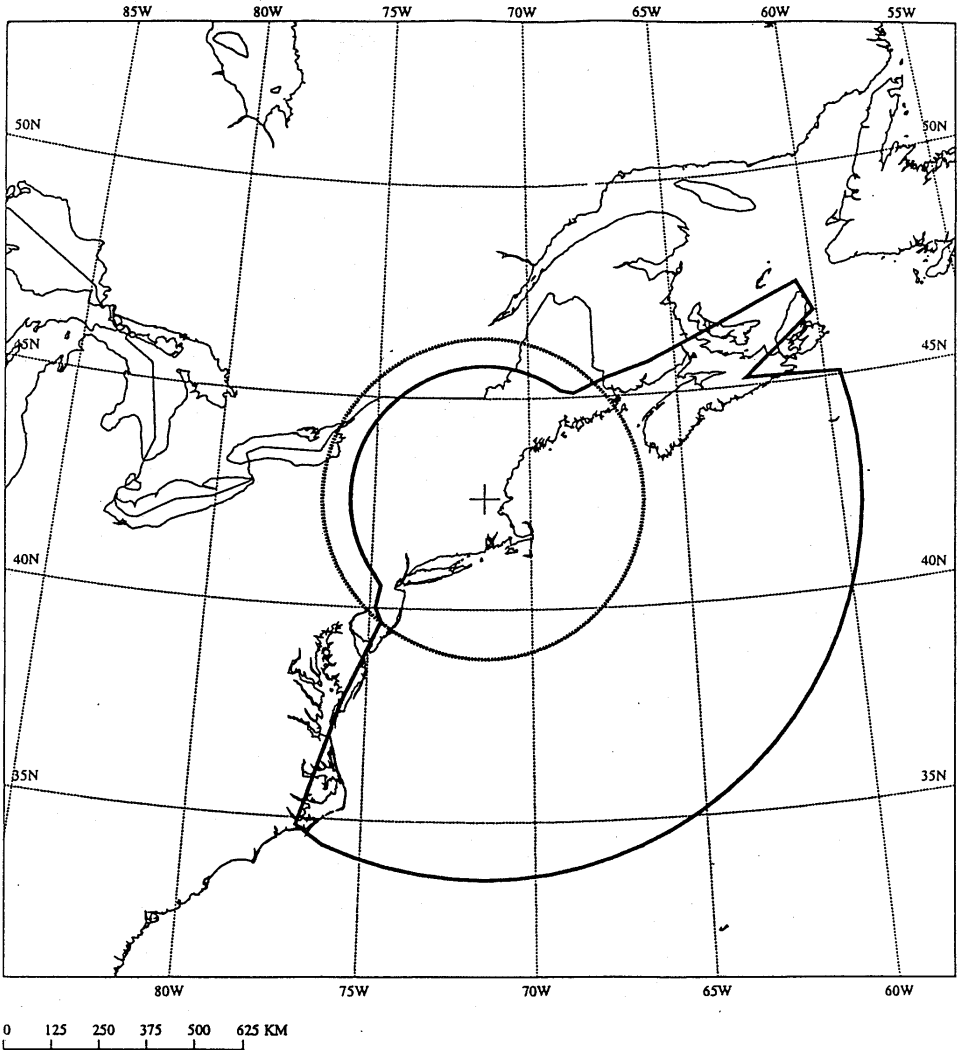
Coordination contour of the earth station in Houston, Texas

ANNEX A-6



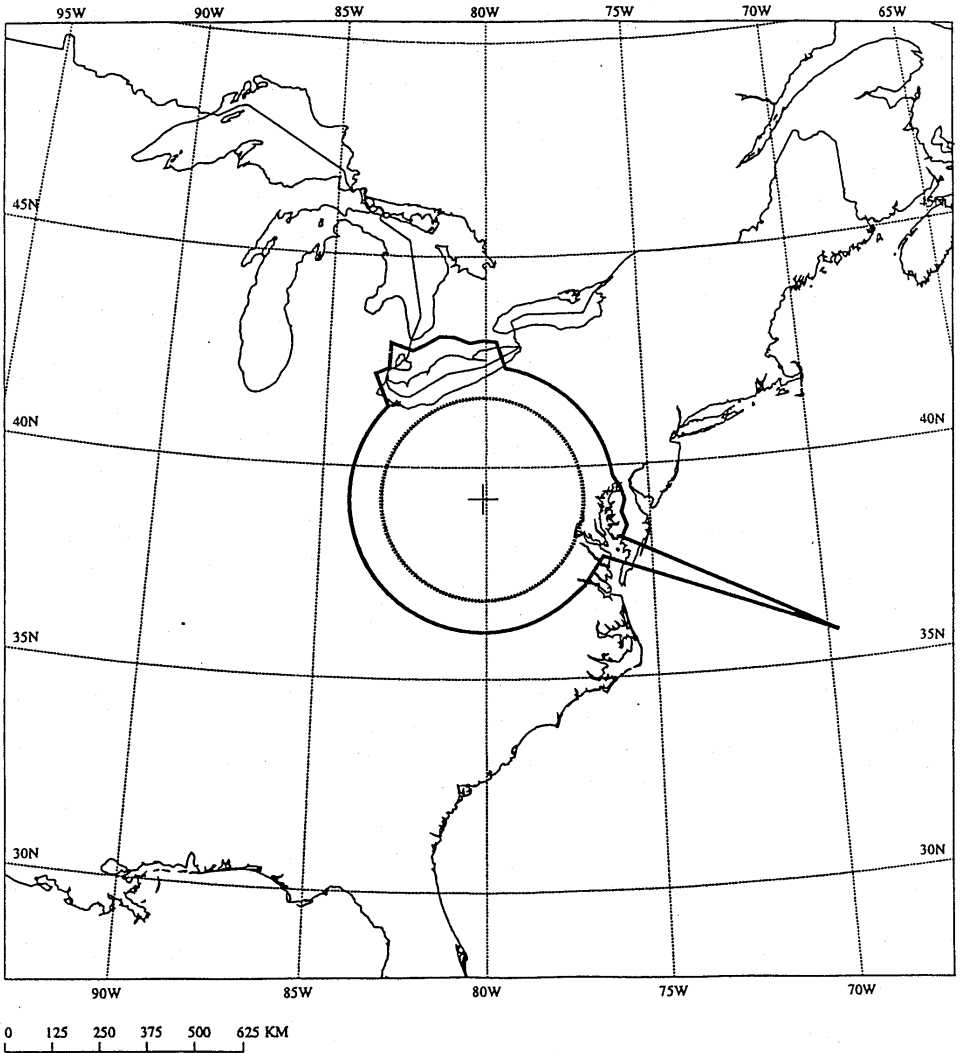
Coordination contour of the earth station in Kitt Peak, Arizona

ANNEX A-7



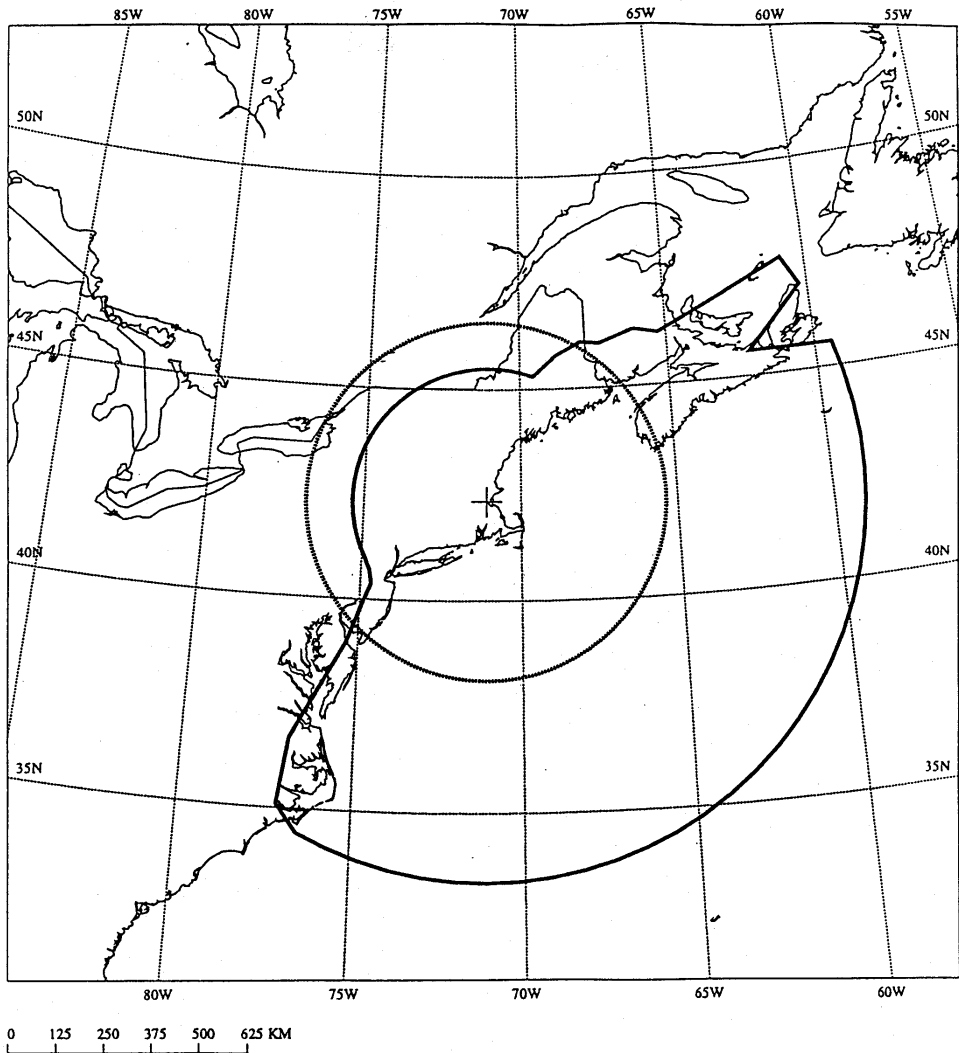
Coordination contour of the earth station in Westford, Massachusetts

ANNEX A-8



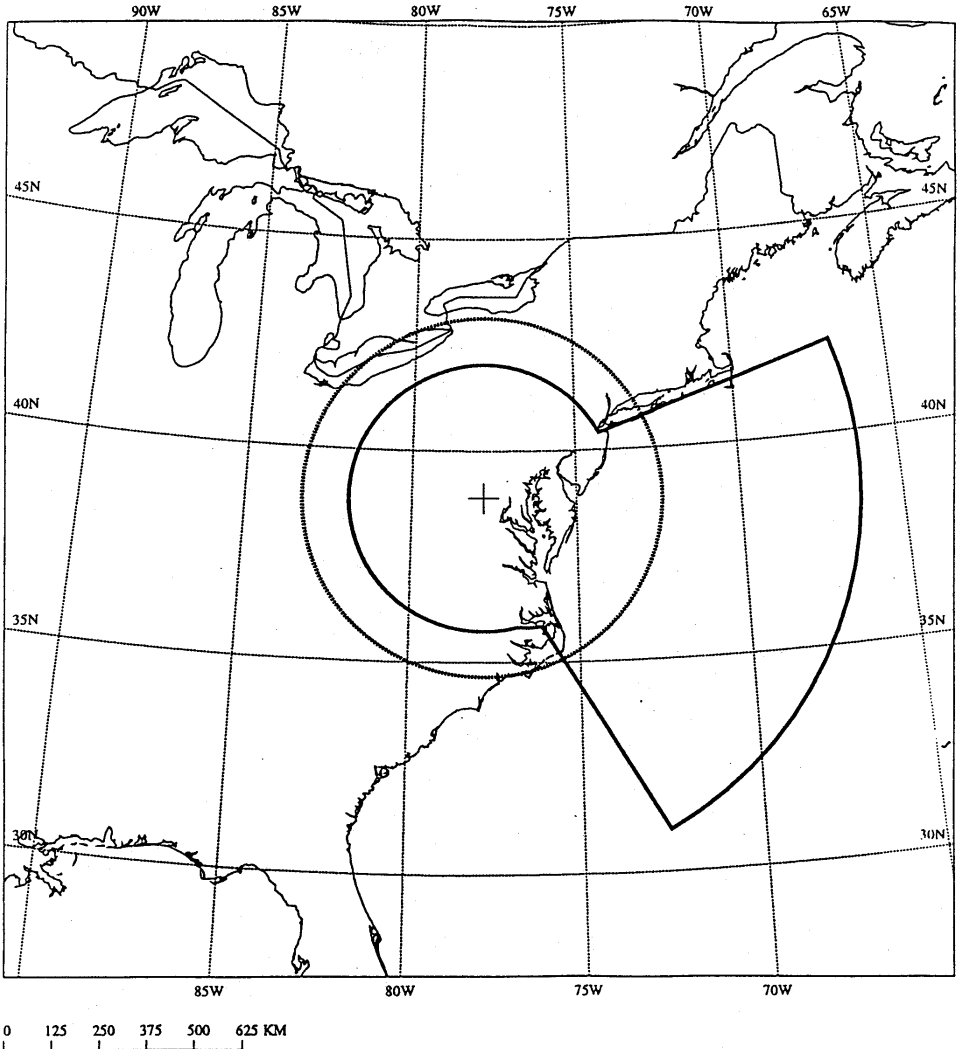
Coordination contour of the earth station in Fairmont, West Virginia

ANNEX A-9



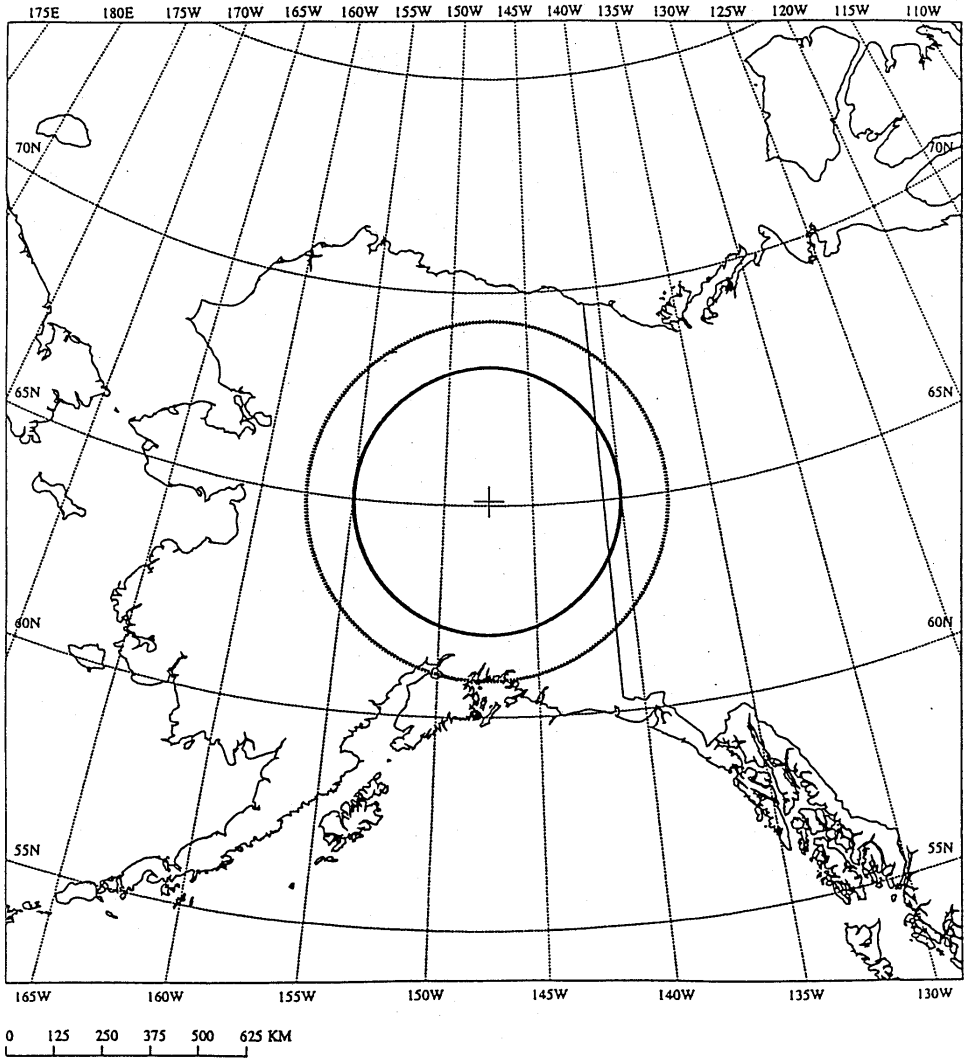
Coordination contour of the earth station in Boston, Massachusetts

ANNEX-A-10



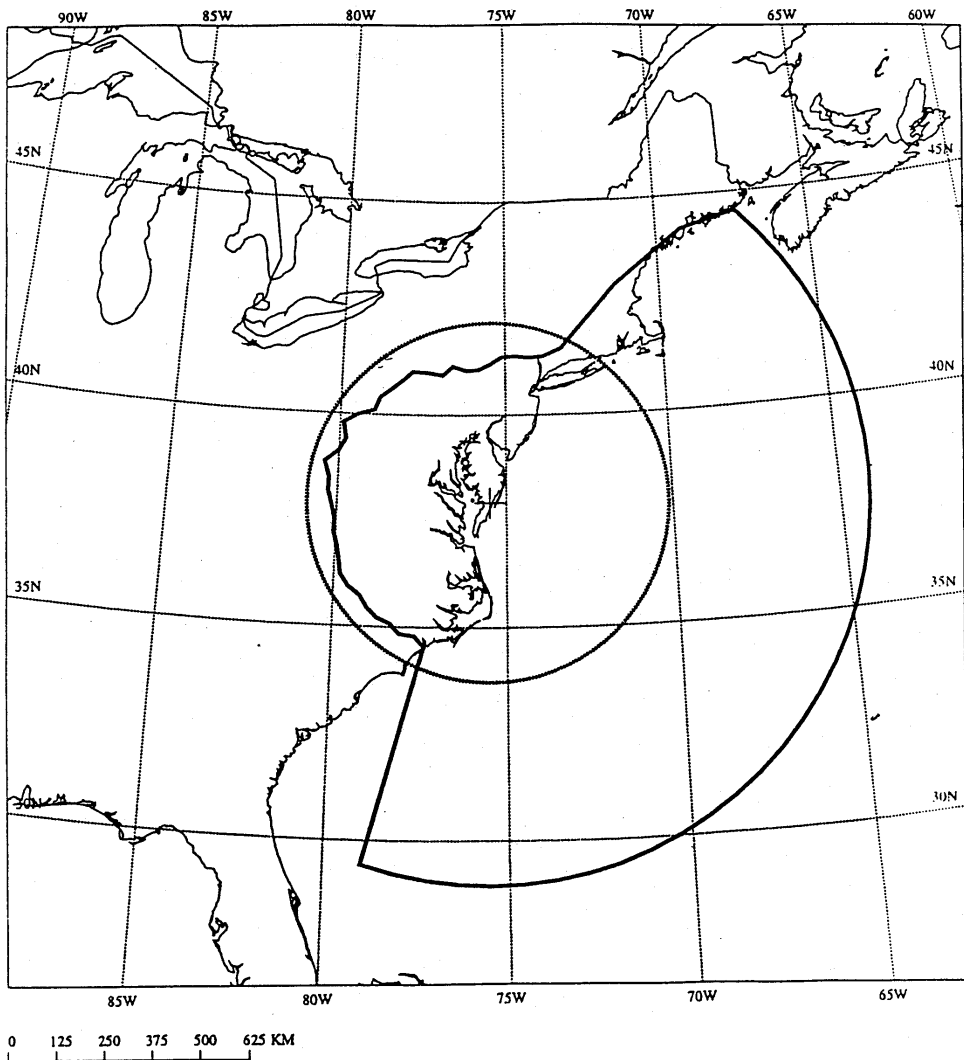
Coordination contour of the earth station in Chantilly, Virginia

ANNEX A-11



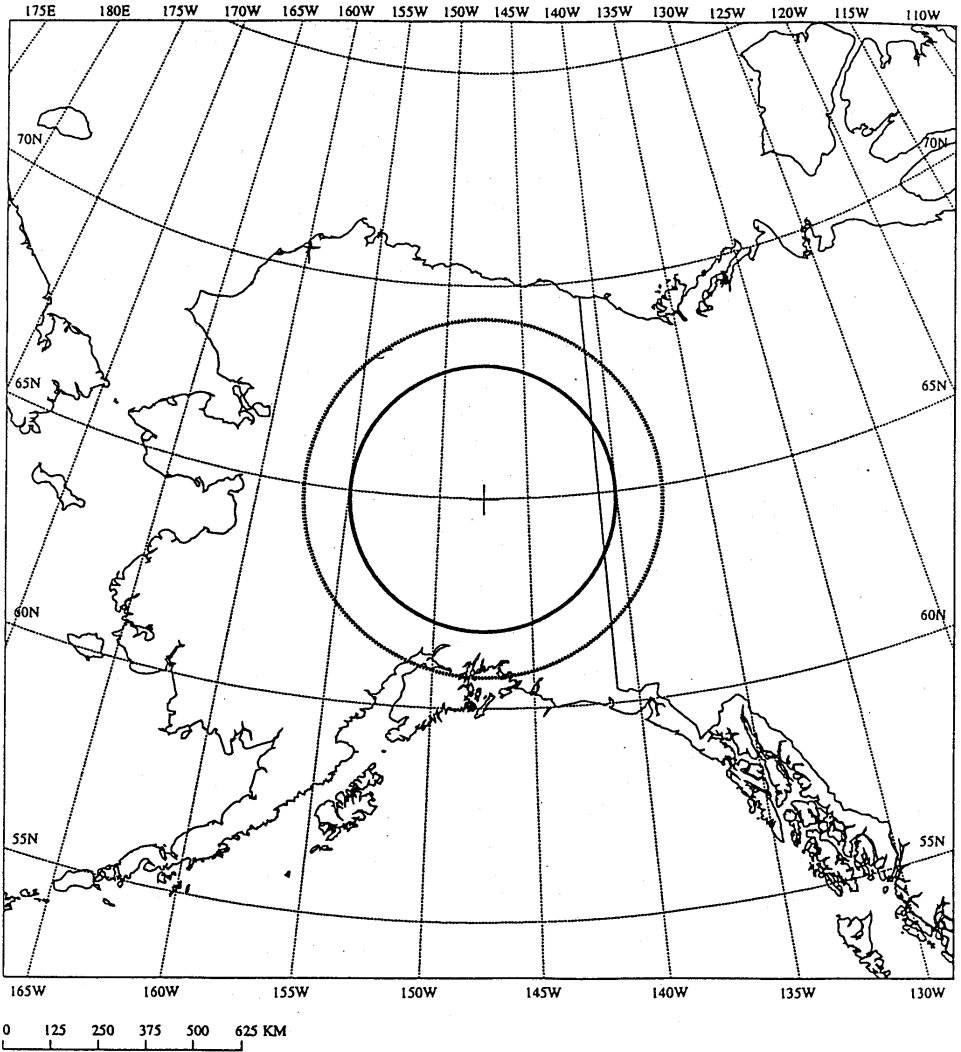
Coordination contour of the earth station in Poker Flats, Alaska

ANNEX A-12



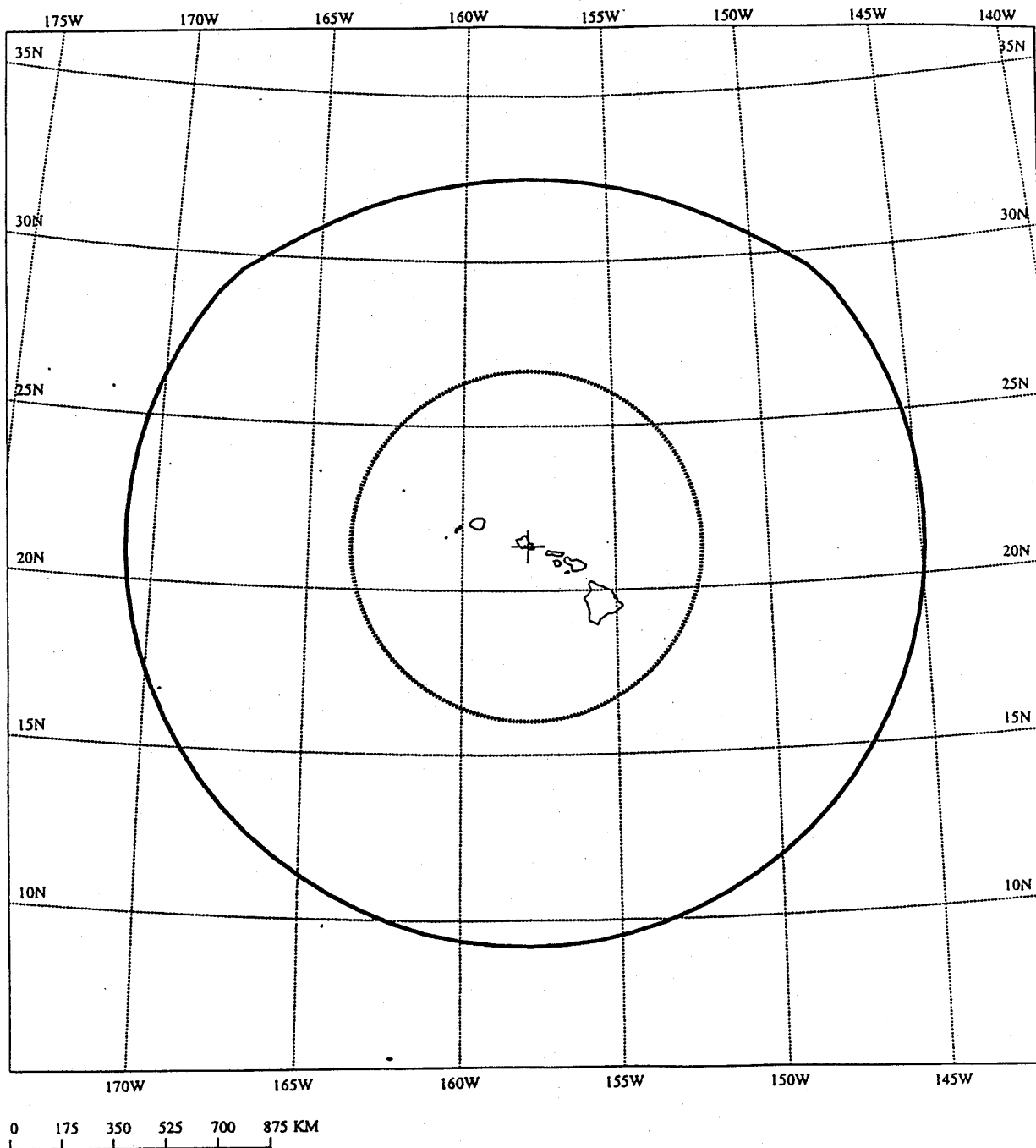
Coordination contour of the earth station in Wallops Is., Virginia

ANNEX A-13



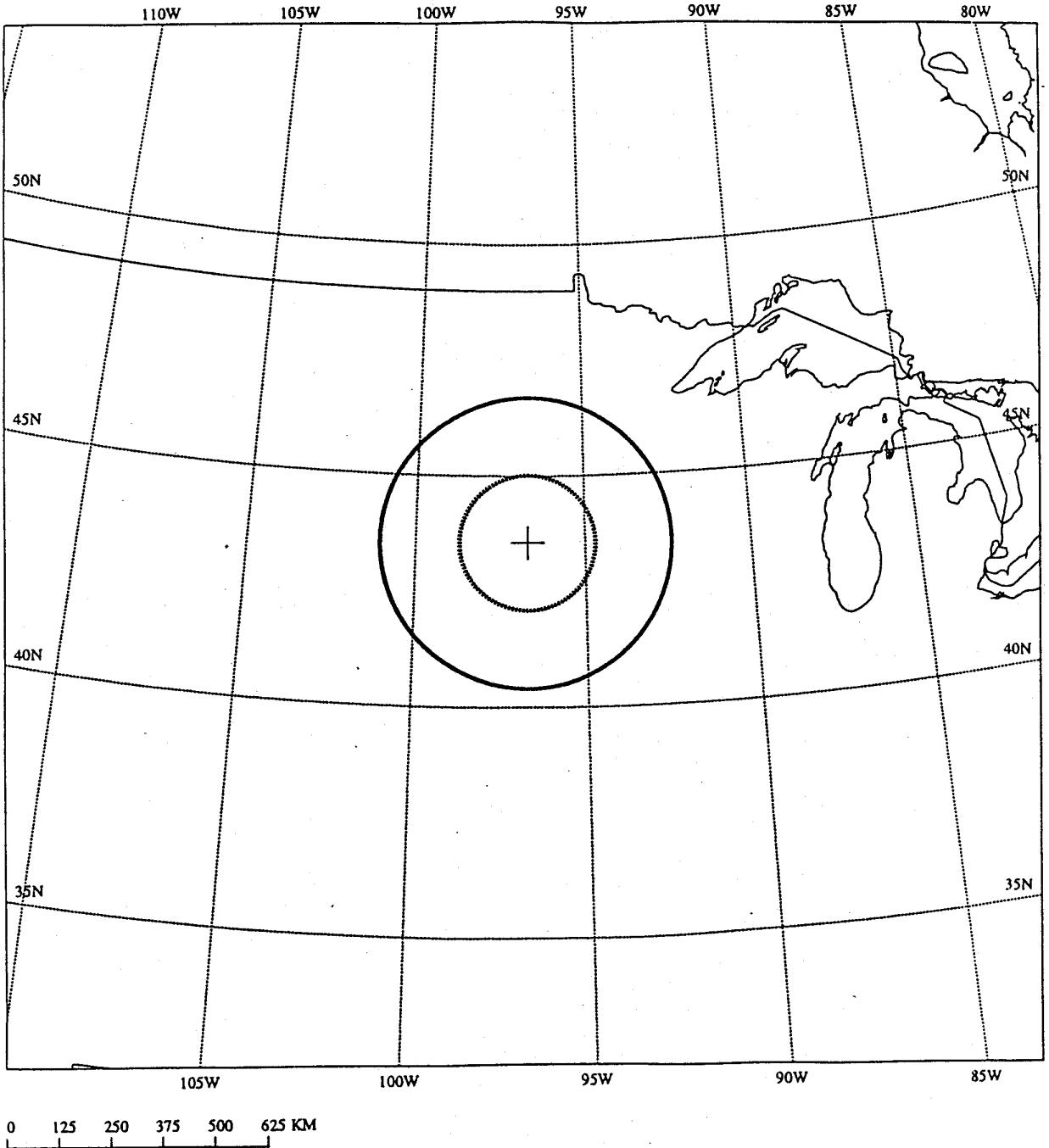
Coordination contour of the earth station in Fairbanks, Alaska

ANNEX A-14



Coordination contour of the earth station in Honolulu, Hawaii

ANNEX A-15



Coordination contour of the earth station in Sioux, South Dakota

**List of Worldwide Satellite Systems
2025-2110 MHz**

	Satellite name	Country/Agency
1	SAC-A	ARGENTINA
2	SAC-B	ARGENTINA
3	SAC-C	ARGENTINA
4	MLMS	BELGIUM
5	CBERS	BRAZIL
6	MECB/S1	BRAZIL
7	RADARSAT 1A	CANADA
8	CHINASAT-41	CHINA
9	CHINASAT-42	CHINA
10	CHINASAT-43	CHINA
11	CHINASAT-44	CHINA
12	CHINASAT-45	CHINA
13	CHINASAT-46	CHINA
14	CHINASAT-47	CHINA
15	FY-2A	CHINA
16	ORSTED	DENMARK
17	ERS-1	ESA
18	ERS-2	ESA
19	ISO	ESA
20	METEOSAT	ESA
21	METEOSAT 4	ESA
22	METEOSAT 5	ESA
23	METEOSAT S1	ESA
24	METEOSAT S2	ESA
25	SOHO	ESA
26	ARTEMIS 16.4E-DR	ESA
27	ARTEMIS 21.5E-DR	ESA
28	ENVISAT-1	ESA
29	INTEGRAL	ESA
30	XMM	ESA
31	ABRIXAS	F.R. GERMANY
32	EUTELSAT 2 7E	FRANCE
33	EUTELSAT 2 13E	FRANCE
34	EUTELSAT 2 16E	FRANCE
35	EUTELSAT 2 21.5E	FRANCE
36	EUTELSAT 2 36E	FRANCE
37	SIRIO 2	FRANCE
38	SPOT 1	FRANCE
39	SPOT 2	FRANCE
40	SPOT 3	FRANCE
41	TDF-2	FRANCE
42	TELECOM 2A	FRANCE
43	TELECOM 2B	FRANCE
44	TELECOM 2C	FRANCE
45	TELECOM 2C	FRANCE
46	DORIS 1	FRANCE

**List of Worldwide Satellite Systems
2025-2110 MHz**

47	DORIS 2	FRANCE
48	EDRSS-E	FRANCE
49	EDRSS-EC	FRANCE
50	EDRSS-W	FRANCE
51	EDRSS-WC	FRANCE
52	EUTELSAT 2 4E	FRANCE
53	EUTELSAT 2 33E	FRANCE
54	EUTELSAT 3 4E	FRANCE
55	EUTELSAT 3 7E	FRANCE
56	EUTELSAT 3 10E	FRANCE
57	EUTELSAT 3 12.5W	FRANCE
58	EUTELSAT 3 13E	FRANCE
59	EUTELSAT 3 14.8W	FRANCE
60	EUTELSAT 3 16E	FRANCE
61	EUTELSAT 3 21.5E	FRANCE
62	EUTELSAT 3 33E	FRANCE
63	EUTELSAT 3 36E	FRANCE
64	EUTELSAT 3 44E	FRANCE
65	EUTELSAT 3 48E	FRANCE
66	EUTELSAT 3 70.5E	FRANCE
67	EUTELSAT 3 76E	FRANCE
68	EUTELSAT 3 80.5E	FRANCE
69	EUTELSAT 3 83.5E	FRANCE
70	EUTELSAT 3 88.5E	FRANCE
71	EUTELSAT-E-44E	FRANCE
72	EUTELSAT-E-48E	FRANCE
73	EUTELSAT-E-70.5E	FRANCE
74	LOCSTAR CENTRAL	FRANCE
75	LOCSTAR EAST	FRANCE
76	LOCSTAR WEST	FRANCE
77	MSG	FRANCE
78	MSG-S1	FRANCE
79	MSG-S2	FRANCE
80	OPS-1	FRANCE
81	OPS-1.1	FRANCE
82	OPS-2	FRANCE
83	OPS-3	FRANCE
84	PROTEUS-OBS	FRANCE
85	PROTEUS-SCI	FRANCE
86	PROTEUS-TPFO	FRANCE
87	SPOT 4	FRANCE
88	SPOT 4-ESBT	FRANCE
89	SPOT 5	FRANCE
90	SPOT 6	FRANCE
91	SYRACUSE-3A	FRANCE
92	SYRACUSE-3B	FRANCE
93	SYRACUSE-3C	FRANCE

**List of Worldwide Satellite Systems
2025-2110 MHz**

94	SYRACUSE-3D	FRANCE
95	SYRACUSE-3E	FRANCE
96	SYRACUSE-3F	FRANCE
97	SYRACUSE-3G	FRANCE
98	SYRACUSE-3H	FRANCE
99	SYRACUSE-3I	FRANCE
100	VIDEOSAT-6	FRANCE
101	VIDEOSAT-7	FRANCE
102	DFS-2	GERMANY
103	DFS-5	GERMANY
104	EQUATOR-S	GERMANY
105	EXPRESS	GERMANY
106	ROSAT	GERMANY
107	TV-SAT 2	GERMANY
108	DFS-6	GERMANY
109	KEPLER 1	GERMANY
110	ASLV	INDIA
111	IRSL-1A	INDIA
112	IRSL-1B	INDIA
113	IRSL-1C	INDIA
114	IRSL-P3	INDIA
115	PSLV	INDIA
116	SROSS-1	INDIA
117	SROSS-C2	INDIA
118	IRSL-P4	INDIA
119	SSR-1	INDIA
120	SAX	ITALY
121	SICRAL 1A	ITALY
122	SICRAL 1B	ITALY
123	EUROSKYWAY-5E	ITALY
124	EUROSKYWAY-10.2E	ITALY
125	EUROSKYWAY-13.2E	ITALY
126	EUROSKYWAY-16.4E	ITALY
127	EUROSKYWAY-22E	ITALY
128	EUROSKYWAY-30E	ITALY
129	EUROSKYWAY-39E	ITALY
130	ITALSAT 10.2E	ITALY
131	ITALSAT 13.2E	ITALY
132	ITALSAT 16.4E	ITALY
133	SARIT	ITALY
134	SICRAL 2A	ITALY
135	SICRAL 2B	ITALY
136	ASTRO-D	JAPAN
137	BS-3	JAPAN
138	CS-3B	JAPAN
139	ETS-5	JAPAN
140	ETS-7	JAPAN

List of Worldwide Satellite Systems
2025-2110 MHz

141	EXOS-C	JAPAN
142	EXOS-D	JAPAN
143	GEOTAIL	JAPAN
144	GMS-4	JAPAN
145	GMS-5	JAPAN
146	HAGAROMO	JAPAN
147	JERS-1	JAPAN
148	LUNAR ORBITER	JAPAN
149	SFU	JAPAN
150	SOLAR-A	JAPAN
151	ADEOS-II	JAPAN
152	COMETS	JAPAN
153	DRTS-113E	JAPAN
154	DRTS-160E	JAPAN
155	DRTS-177E	JAPAN
156	DRTS-E	JAPAN
157	DRTS-W	JAPAN
158	ETS-8-129E	JAPAN
159	ETS-8-135E	JAPAN
160	ETS-8-146E	JAPAN
161	GMS 120E	JAPAN
162	GMS 140E	JAPAN
163	GMS 160E	JAPAN
164	LUNAR-A	JAPAN
165	MTSAT-135E	JAPAN
166	MTSAT-140E	JAPAN
167	MTSAT-145E	JAPAN
168	MUSES-B	JAPAN
169	OICETS	JAPAN
170	TAIKI-109.65	JAPAN
171	KITSAT-3	KOREA
172	KOMPSAT-1	KOREA
173	KOMPSAT-2	KOREA
174	MALTASAT-1A	MALTA
175	MALTASAT-1B	MALTA
176	MALTASAT-1C	MALTA
177	MALTASAT-1D	MALTA
178	ACE	NASA
179	CASSINI	NASA
180	COBE	NASA
181	ERBS	NASA
182	EUVE	NASA
183	FAST	NASA
184	GRO	NASA
185	HST	NASA
186	ISTP POLAR	NASA
187	LANDSAT-4	NASA

ANNEX - B (con't)

List of Worldwide Satellite Systems
2025-2110 MHz

188	LANDSAT-5	NASA
189	LUNAR PROSPECTOR	NASA
190	MICROLAB-1	NASA
191	SAMPEX	NASA
192	SPACE SHUTTLE	NASA
193	TDRS-1	NASA
194	TDRS-3	NASA
195	TDRS-4	NASA
196	TDRS-5	NASA
197	TDRS-6	NASA
198	TDRS-7	NASA
199	TOMS-EP	NASA
200	TOPEX/POSEIDON	NASA
201	TRMM	NASA
202	UARS	NASA
203	WIND	NASA
204	WSF	NASA
205	XTE	NASA
206	AXAF-I	NASA
207	COMET	NASA
208	EOS AM 1	NASA
209	EOS AM 2	NASA
210	EOS CHEM	NASA
211	EOS LAM	NASA
212	EOS PM	NASA
213	FUSE	NASA
214	GRAVITY PROBE-B	NASA
215	HETE	NASA
216	IMAGE	NASA
217	INT'L SPACE STATION ACS	NASA
218	NMP/EO-1	NASA
219	QUIKSCAT	NASA
220	SNOE	NASA
221	SWAS	NASA
222	TDRS H	NASA
223	TDRS I	NASA
224	TDRS J	NASA
225	TERRIERS	NASA
226	TIMED	NASA
227	TRACE	NASA
228	WIRE	NASA
229	GOES 10	NOAA
230	GOES 7	NOAA
231	GOES 8	NOAA
232	GOES 9	NOAA
233	GOES EAST 1	NOAA
234	GOES WEST 1	NOAA

ANNEX - B (con't)

List of Worldwide Satellite Systems
2025-2110 MHz

235	GOES L	NOAA
236	GOES M	NOAA
237	NOAA-K	NOAA
238	NOAA-L	NOAA
239	NOAA-M	NOAA
240	NOAA-N	NOAA
241	NOAA-N'	NOAA
242	BADR-B	PAKISTAN
243	GOMS-1M	RUSSIA
244	GOMS-2M	RUSSIA
245	GOMS-M	RUSSIA
246	GONETS	RUSSIA
247	KOSKON	RUSSIA
248	GREENSENSE-1	SOUTH AFRICA
249	GROENSAT-TP1	SOUTH AFRICA
250	HISPASAT-1	SPAIN
251	MINISAT 1	SPAIN
252	SIRIUS-2	SWEDEN
253	TELE-X	SWEDEN
254	ASTRID-2	SWEDEN
255	ODIN	SWEDEN
256	ROCSAT-1	TAIWAN
257	STRV-1	UK
258	CRSS-1	USACommercial
259	EARTHWATCH-1A	USA-Commercial
260	EARTHWATCH-1B	USA-Commercial
261	ORBVVIEW-2	USA-Commercial

FOR AGENDA

Doc. 29872/1-4.9.2/2.4.2/6.15

National Aeronautics and
Space Administration
Headquarters
Washington, DC 20546-0001

ANNEX - C



Reply to Attn of:

OI

JUL 19 1996

Mr. William Gamble
Chairman, IRAC
NTIA/Department of Commerce
Room 4099A
14th and Constitution Avenue, NW
Washington, DC 20230

Dear Mr. Gamble:

As you know, NASA makes use of frequency allocations to the Space Research, Space Operations and Earth Exploration Satellite services in the 2 GHz spectrum region for support of all of the Agency's spacecraft missions. This includes such major Programs as the Space Shuttle, the Tracking and Data Relay Satellite System (TDRSS) and the Hubble Space Telescope. In the future, the same bands will provide a major portion of the communications support for the International Space Station.

Until 1992 at the World Administrative Radio Conference (WARC-92) in Geneva, the use of these frequency allocations was per Article 14 of the Radio Regulations and required a great deal of "coordination with Administrations concerned." As a result of NASA and U.S. efforts at that Conference, allocations in the 2 GHz bands (specifically 2025-2110 and 2200-2290 MHz) were elevated in status to Primary worldwide. However, in the U.S. Table of Allocations, although the 2200-2290 MHz band is now Primary, the 2025-2110 MHz band is still designated Secondary status via U.S. Footnote 90.

NASA believes that the time has come to recognize such major economic and scientific programs as the Space Shuttle, the Hubble Space Telescope, the TDRSS and the International Space Station as national resources, requiring more explicit documentation of its Secondary status in the U.S. Table. It has become evident after nearly 30 years of use, that the space services can continue to successfully share the band with other allocated users and in fact, Enclosure 2 presents good evidence of this. As a result, NASA is submitting a proposal to IRAC to bring the U.S. Table of Allocations more nearly in line with the International Table in the 2025-2110 MHz band.

Enclosures 1 through 4 present background and support information for this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "David Struba".

David Struba
NASA Representative, IRAC
Office of Space Communications

4 Enclosures

FOR AGENDA



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

Doc. 30063/1-2.8.2.1/4.22/6.15
Ref. Doc. 29872/1-4.9.2/2.4.2/6.15
30032/1-2.8.2.1/4.22/6.15

January 2, 1997

Mr. Richard Smith
Chief, Office of Engineering
and Technology
Federal Communications Commission
Washington, D.C. 20554

Dear Mr. Smith:

I am writing on behalf of NASA and the Department of Commerce to request that the Federal Communications Commission (FCC) take into account the Government requirements for the use of the band 2025-2110 MHz in any reallocation of this band. The Government use includes such programs as the Hubble Space Telescope, the Space Shuttle, and the Tracking and Data Relay Satellite System (TDRSS).

Early in the national space programs the band 2025-2110 MHz was chosen as the uplink for NASA and other Government agency's space programs for the space research and earth exploration-satellite services. This Government use was recognized in the National Table of Frequency Allocations through footnotes US90, US111, US219 and US222. Internationally this type of use in the band is recognized as it is allocated worldwide on a primary basis to these services.

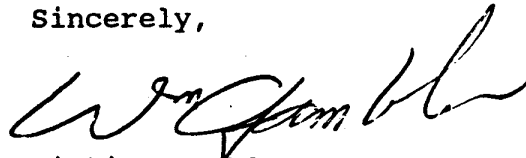
The Government agencies have been able to operate in the band on a secondary basis to the current FCC licensees since there has been good coordination and cooperation among the parties.

We understand that the FCC is considering reallocating this band to mobile services and may then use competitive bidding. We request that the FCC recognize the Government use when considering such uses of the band and provide adequate protection for these national systems.

It is noted that the potential problem from the introduction of high density mobile users in this band has been recognized in the International Telecommunication Union. The ITU-R has adopted Recommendation SA. 1154, "Provisions to Protect the Space Research (SR), Space Operations (SO) and Earth Exploration Satellite Services (EES) and to Facilitate Sharing with the Mobile Service in the 2025-2110 MHz and 2200-2290 MHz Bands," which is enclosed. That document recommends specific limits to protect the SR, SO, and EES services from aggregate interference from emissions of mobile systems in the 2025-2110 MHz band.

Staff from this office will work with the Commission staff to determine any sharing agreements or transition plans to protect these Government services. Thank you for your attention to this matter. Please contact either Richard Parlow or Edward Davison of this office at 202-482-1850 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "William Gamble". The signature is fluid and cursive, with a large initial "W" and a long, sweeping tail.

William Gamble
Deputy Associate Administrator
Office of Spectrum Management

cc: Michele Farquhar
Donald Gips



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

February 11, 1998

Mr. Richard Smith
Chief, Office of Engineering and Technology
Federal Communications Commission
2000 M Street N.W.
Washington, D.C. 20554

Dear Mr. Smith:

In the OSM January 2, 1997 letter to you, the importance of the band 2025-2110 MHz to the Federal government was indicated, and we requested that the Federal government's requirements be taken into account in any proceedings that the Commission undertakes in this band. Of principle concern were the potential sharing problems which would arise if high-density mobile systems were introduced into the band. These concerns and certain changes in the international rules and regulations have now prompted OSM to request that the National Table of Frequency Allocations be modified to reflect primary status for space services by the Federal Government in the 2025-2110 MHz band. (Proposed changes to the National Table of Frequency Allocations are provided at Enclosure 1.)

As you know, this is the primary band used by the National Aeronautic and Space Administration (NASA), the National Oceanic and Atmospheric Administration (NOAA), and space agencies worldwide for Earth-to-space and space-to-space communications. The Federal government has been operating in this band for over 30 years and has a financial investment of over 30 billion dollars in the band. For a number of technical and policy reasons, NASA and NOAA cannot satisfy critical mission requirements in other allocated spectrum. NASA and NOAA use this band for over 60 U.S. satellites, including such programs as the Space Shuttle, the Tracking and Data Relay Satellite System (TDRSS), the Hubble Space Telescope, Geostationary Operational Environmental Satellite (GOES), and the International Space Station. Note that under existing Footnote US222 of the National Table certain Federal government sites already have co-equal status.

The U.S. also has long-standing international treaty obligations with respect to allocations to the space services in the International Table of Frequency Allocations. (A historical summary of the international space allocations for this band is shown in Enclosure 2.) NASA and NOAA have numerous obligations to support other administrations' space programs in this band. Among others, Brazil, Canada, France, Germany, India, Italy, Japan, Russia, Spain, Sweden, Ukraine, and the United Kingdom have launched satellites that use this band. Additionally, many administrations have indicated that the 2025-2110 MHz band will be used when they launch their first satellites. (A listing of existing and planned world wide satellite systems is shown in

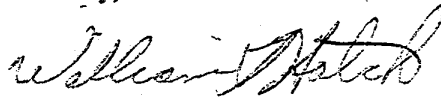
Enclosure 3.)

Since OSM's earlier letter, there have been many developments concerning this band that support this request for modifying the National Table of Frequency Allocations. For example, auction of spectrum within the 1990-2110 MHz frequency range was identified as a potential source of revenue in the Balance Budget Act of 1997. The FCC has issued a rulemaking on mobile-satellite and terrestrial services (FCC 97-93). And finally, WRC-97 acted to prohibit the introduction of high-density mobile systems into this band.

NTIA believes now is the opportune time to modify the National Table of Frequency Allocations in the 2025-2110 MHz band. Such modification would conform with the International Table of Frequency Allocations and will implement nationally the results of WARC-92, WRC-95, and WRC-97. FCC should ensure that terrestrial systems in the band be limited to those that conform with the relevant ITU Radio Regulations and ITU-R Recommendations. Such assurance is needed to safeguard the ability of the Federal government space programs to continue to satisfy their requirements in this frequency band -- the backbone of the U.S. space program.

NTIA looks forward to working with the Commission to assure the protection of national and international space services. If you have any questions, please contact Mr. Edward M. Davison (phone (202)-482-1164; fax (202)-482-2830; email edavison@ntia.doc.gov).

Sincerely,



William T. Hatch
Acting Deputy Associate Administrator
Office of Spectrum Management

Enclosures

- 1 - Proposed Changes to the U.S. Table of Allocation
- 2 - Summary of the History of the International Allocation
- 3 - List of Worldwide Satellite Systems

cc: Daniel Phythyon, Chief, FCC Wireless Telecommunications Bureau
Regina Keeney, Chief, FCC International Bureau

REFERENCES

1. The National Telecommunications and Information Administration Organization Act, Pub. L. No. 102-538, 106 Stat. 3353 (1992) (Codified at 47 U.S.C. § 901 *et seq.*).
2. The Balanced Budget Act of 1997, Pub. L. 105-33, 111 Stat. 251. (1997) Title III-Communications and Spectrum Allocation Provisions, (July 26, 1997).
3. FCC, First Report and Order and Further Notice of Proposed Rule Making, Amendments of Section 2.106 of the Commission's Rules to Allocate Spectrum at 2 GHz for use by the Mobile-Satellite Service, ET Docket No. 95-18, Released on March 14, 1997.
4. Draft NTIA Ad Hoc 206 Report, AH 206-388/8, Implementation of the Results of WARC-92 and WRC-95, April 1998.
5. Facsimile form Jim Ellickson, NOAA Landsat 7 Program Manager, NASA, to Ernie Cerezo, NTIA, Subject: Landsat 5/7 Mission, (Sept. 10, 1998).
6. NOAA/NASA Publication, NOAA-K, NP-1997-12-052-GSFC, (1997)
7. Letter form David Struba, IRAC Representative, NASA, to William Gamble, IRAC Chairman, NTIA, Subject: Request to Upgrade the Allocation of the 2025-2110 MHz Band to Primary Status, (July 19, 1996).
8. Letter from William Hatch, Acting Associate Administrator, Office of Spectrum Management, NTIA, to Richard Smith, Chief, Office of Engineering and Technology, FCC, requesting primary status for Government operations in the 2025-2110 MHz Band, (February 11, 1998) (Attached as Annex E).
9. NASA's Working Papers on S-Band Workshop, 2025-2110 MHz and 2200-2290 MHz Bands, Goddard Space Flight Center, (July 14-15, 1997).
10. Facsimile from Wayne Whyte, Spectrum Manager, NASA, to William Hatch, Associate Administrator, Office of Spectrum Management, NTIA, Subject: Replacement and investment costs (October 16, 1998).
11. Letter from Wayne Whyte, Spectrum Manager, NASA, Ernie Cerezo, NTIA, Subject: Federal system replacement costs, (November 2, 1998).
12. NASA/NOAA Briefing Material to OMB on Use of the Spectrum in the 1990-2120 MHz Band, (September 30, 1997).