World Ham Radio Organisation

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Members of the SE40 Group,

We would like to draw the attention of the committee to our comments on the resolution on point 9.1b of WCR19.

- Duration of use of a ham radio station. The duration is calculated globally over a year, it absolutely does not take into account the reality of a radio exchange. On average a radio exchange does not last for a maximum of 10 minutes with exchanges every minute maximum, that is to say one minute in transmit and one minute in reception.
- In the uses of Galileo, the duration of interruption of the service would therefore be of 1 minute at the most, see less if the user of Galileo is mobile and that it crosses the field of an ham radio emission. It is highly likely that the reception system is intended for this kind of desynchronization equivalent to crossing a tunnel by a car that can last more than 5 minutes.
- The uses proposed by Galileo are not sufficiently technically informed, in this case we cannot ask for precise protections.
- In the document, it says a power of 300W, what power are we talking about? The legally authorized power is 120W transmitter output. The power usually used in transmitter output is 1 to 10 watts.
- On what study does Switzerland base the distribution of ham radio on the band? If they are Swiss ham radio, this study cannot be taken as a reference for all CEPT countries. The traffic recorded on the clusters is only partial. The clusters are only used by an extreme minority of ham radio.
- The production by France of the map taken from the declarations of amateur radio stations does not at all reflect the reality of the terrain. Indeed ham radio declare their station if the power is greater than 5W, so many stations are not declared because less than 5 W. On the other hand, many ham radio have reported stations in 1.2 GHz and are not equipped, they intended to do so one day and therefore made a statement of principle.
- Evaluation scenarios: it is obvious that 2 transmits/receipts on the same band cause disturbances, it is useless to produce pages of diagrams, and it is obvious. We'll never be able to stop it. Receivers must be equipped with adequate filters, and software capable of withstanding temporary desynchronisation.
- The measures taken in Germany and Italy are purely theoretical, and real measures must be taken. They show that the disturbances caused do not require special protection.

In conclusion, putting a distance between the stations of 35 km is unverifiable, for example in my case I live in the field, how can I know that the tractor which plows the field next to me, uses a Galileo GPS and aims versa, how can the grower know that I have a 1.2 GHz station unless they know something and take binoculars to see a 1/4 wave antenna, 7 cm at 18 m high. Setting a power limitation is also unverifiable. Limiting the type of antenna is also unverifiable. The GPS installed on

the band must provide for possible desynchronization, and there are no restrictions to impose on ham radio. To think that if there are restrictions they must be able to be verified to possibly be punished, otherwise it is useless to make limitations. Moreover, the primary status of the radiolocation already protects them from disturbances opposite a secondary user.

We also have a general comment on the use of the 1.2 GHz band for radiolocation. Indeed the geopolitical situation is totally called into question by the latest events of 24 February 2022 and the exclusion of the Russian Federation and Belarus from the CEPT. The American GPS is on a frequency band where they are alone, and the amateur radio band is shared with the GPS of Russia, France, Japan, China and Korea. Don't think that for a strategic global security issue, all GPS should be on the same operating band and require guarantees from each other in order to monitor this band that would only be allocated to GPS. With the view that ham radio stations would no longer be allowed on the band (which we absolutely do not want), the security of that band would not be preserved at all in the sense that you're not going to be able to remove all the ham radio transmitters that build them themselves, and you're not going to be able to remove all the open-access documentation. There will always be opportunities for interference from unknown and malicious users. We therefore think that the CEPT should question the appropriateness of answering question 9.1b asked by the CMR19 and consider the transfer of the activity radio localization on a single operating band with international management and agreements between users. So it's a real issue that depends on the ITU and therefore the UN. We think this issue needs to be resolved quickly and not wait for WRC 27 with an issue on the agenda at WRC 23.

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