Space Agency / Civil Security and Regulatory affairs

Deutsches Zentrum
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German Aerospace Center

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Your reference
Your letter
Our reference

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05 August 2022

Subject: German Space Agency Response to the Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023

Dear Madam, dear Sir,

The German Space Agency at DLR welcomes the opportunity to respond to the public consultation on the Public Consultation on the Draft RSPG Opinion on ITU-R World Radiocommunication Conference 2023.

As you may know, the German Space Agency conceives and executes the German Space Program on behalf of the German government, and integrates the German space activities on national and European level. Also, the German Space agency is assigned with the implementation of the Space strategy adopted by the German government on 30th November 2010.

Please find below our comments on the Draft RSPG Opinion, in particular on the RSPG recommendations:

- The German Space Agency appreciates and supports the current RSPG recommendations, in particular those on the agenda items 1.2, 1.11, 1.14, 9.1.a and 9.1.d.

  For Agenda item 1.2, we would like to add explicitly that the German Space Agency shares the RSPG opinion and its RSPG recommendation for the frequency range 10 – 10.5 GHz to protect the EESS (active) and EESS (passive) against potential interference produced by 5G devices in Region 2, if WRC-23 allocates this frequency range to IMT. Current studies show that the impact from 5G transmissions on EESS receivers would be imminent and lead to a loss of data in areas which are of high interest for the monitoring of climate change.

  In general, from our point of view the positions and recommendations given in your document allow the scientific space sector to successfully play a vital role for the protection of life and property and for our weather sensitive economy by keeping the spectrum resources for these operations within the framework of the MetSat and EESS services globally available and effectively protected in the long term.

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- Concerning agenda item 9.1.b, the German Space Agency supports the RSPG recommendation that the EU should establish technical conditions applicable to the secondary amateur service that provide adequate protection of the radionavigation satellite service, including various Galileo services (HAS, CAS and PRS) receivers, in the frequency band 1 260 - 1 300 MHz in an ITU-R Recommendation. But the German Space Agency also believes that it would benefit the Galileo programme to investigate and incorporate technical solutions to improve the robustness of Galileo devices against interference events occurring from other incumbent services, including the amateur service, in the frequency band 1240 – 1300 MHz. We also believe that it will be very difficult to convince the ITU member states at the next World Radiocommunication conference to limit the usage of the frequency band 1260 – 1300 MHz for the amateur service. Therefore, we kindly ask you to consider a balanced approach which allows the coexistence of all the concerned services in this frequency band.

Considering the above, the German Space Agency encourages the RSPG to be diligent in their efforts to ensure the necessary protection of the frequency bands used by the scientific space sector and to consider our comments in regard to agenda item 9.1.b.

Sincerely

Ralf Ewald

Digital signiert von Ralf Ewald
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