



**International Amateur Radio Union**

**Region 1**

Comments on

**Public consultation on the Draft RSPG Opinion on**

**5G implementation challenges (RSPG 3rd opinion on 5G)**

The International Amateur Radio Union (IARU) is a Non-Governmental Organisation representing the interests of Radio Amateurs. The amateur radio service is one of the oldest radio services recognised and regulated by the International Telecommunication Union (ITU) and pre-dates the regulation of radio communications. Having a strong Amateur Radio service has been recognised by Governments not only for the development of technical knowledge but as providing a network of radio stations which is geographically diverse and is able to assist in times of disaster.

The economic importance of having a sufficient supply of trained engineers and scientists within the Union to meet future employment needs and technological development is critical. Amateur radio can provide an introduction to practical engineering, mathematics and physics to youth which directly contributes to a promotion in interest in careers in STEM.

Concerning the stated defragmentation of the 3.4-3.8 GHz frequency band IARU notes that the RSPG recommends that Member States (MS) design spectrum award mechanisms that provide the opportunity to obtain sufficiently large contiguous spectrum blocks to facilitate high throughput multi-Gb/s 5G services such as enhanced mobile broadband.

IARU also notes that RSPG recommends that Member States phase out, as soon as possible, legacy Electronic Communications Systems (ECS) use of the band, which is not compatible with the 5G harmonized technical conditions.

Since amateur radio falls within the definition of an ECS, IARU which represents the views of its Member Societies in most countries of the World feels it necessary to respond to the RSPG's statement. Concerning Article 5 of the ITU Radio Regulations, in ITU Regions 2 and 3 there is a secondary allocation to the amateur service in the band 3 300 – 3 500 MHz and by means of Radio Regulation 5.431 in Germany 3 400 – 3 475 MHz.

In the 1990's CEPT conducted a spectrum review in order to develop wherever possible a harmonized approach to the use of spectrum. This resulted in a guard-band 3 400 – 3 410 MHz separating radiolocation below 3 400 MHz and the fixed and fixed-satellite services above 3 400 MHz. That 10 MHz guard-band was then made available to the amateur service on a secondary basis for *inter alia* inter-continental Earth-moon-Earth communications as it was available in all 3 ITU regions. The European Common Allocation table reflects this situation and a number of CEPT administrations have authorized their amateurs to operate in this frequency band.

Since 3 400 – 3 410 MHz sits on the edge of the 3.4 – 3.8 GHz band which is the subject of consultation, IARU therefore wishes to request RSPG to recommend the continued use of 3 400 – 3 410 MHz by the amateur service in Member States of the EU, subject to the views of national administrations.

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