



**Civil Aviation Department
Ministry of International Business
and International Transport -
(Barbados)**



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**Building No.4
Grantley Adams Industrial Estate
Grantley Adams International Airport
Christ Church, BB17089, Barbados
West Indies, The Caribbean**

In reply to this letter please quote

Ref. No.: 2524/10-2

13 February 2009

Mr. Taïeb Chérif
Secretary General
International Civil Aviation Organisation
999 University Street
Montreal, Quebec
CANADA H3C 5H7

Dear Sir,

**Draft ICAO Position on Items of Interest to Aviation on the Agenda of the
International Telecommunication Union (ITU) World Radiocommunication
Conference (2011) (WRC-11)**

I refer to your State Letter Ref. E/3/5-08/69 dated 28 November 2008 on the above subject.

I wish to inform you that Barbados reviewed the ICAO Draft Position for the ITU WRC-11 and has found the contents to be in order and worthy of support. In this regard, Barbados awaits the receipt of the ICAO Position for the WRC-11 where the Telecommunications Unit, Ministry of Finance Investment, Telecommunications and Energy will be urged to support the ICAO's Position at the upcoming ITU WRC-11.

Yours faithfully

M.H. BECKLES
for Director of Civil Aviation

Copy: Permanent Secretary
Ministry of International Business and International Transport

2014
2015



JABATAN PENERBANGAN AWAM MALAYSIA
(DEPARTMENT OF CIVIL AVIATION MALAYSIA)
ARAS 1-4, BLOK PODIUM,
NO 27, PERSIARAN PERDANA, PRESINT 4,
PUSAT PENTADBIRAN KERAJAAN PERSEKUTUAN,
62618 PUTRAJAYA
MALAYSIA

Telefon : 6-03-88714000
Faks : 6-03-88901640
AFTN : WMKKYAYX
Teleks : PENAWA MA 30128
Kawat : CIVIL KUALA LUMPUR
Web : <http://www.dca.gov.my>



(13) DCA/PU/12/85/SJ.7 VOL.6

17 February 2009

Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec
Canada H3C 5H7

Dear Sir,

Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)

I am directed to refer to your letter of 28 November 2008 regarding the above mentioned.

We wish to inform you that the Department of Civil Aviation, Malaysia supports the ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11).

For your information, the Department of Civil Aviation, Malaysia has taken the following initiatives in support of ICAO's position:

- i. the draft ICAO position was forwarded to the State's frequency spectrum regulator emphasizing and urging them to seriously consider adopting the ICAO position as Malaysia's position;
- ii. participate actively in all meetings and discussions at the national level relating to the State's preparation for WRC-2011; and
- iii. endeavour to be represented as part of the State's delegation at regional and international meetings organized by ITU relating to the preparation for WRC-2011.

Thank you.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Gunaseelan V', with a horizontal line underneath the name.

(**GUNASEELAN. V**)

for Director General of Civil Aviation
Department of Civil Aviation, Malaysia.



2017

February 27, 2009

Ref. No. SOI/GM/001/SLAN E3/5-0869/ 02-09

Dr. Taieb Chérif
Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec H3C 5H7

Subject: ICAO State Letter E 3/5-08/69
Draft ICAO Position on items of interest to aviation on the agenda of
the International Telecommunication Union (ITU) World
Radiocommunication Conference (2011) (WRC-11)

Dear Dr. Chérif,

With reference to the proposed draft ICAO position on the agenda of the ITU/WRC-11 as specified in the above-mentioned State letter, I wish to inform that IATA's position is one of agreement. Nevertheless, regarding WRC-11 Agenda Item 1.3 additional study will be needed to identify appropriate spectrum for the links needed to safely integrate the different UAS into segregated airspace, and with regard to Agenda Item 1.21 IATA will stress the need to ensure non-interference to the aeronautical radionavigation service and acknowledge that further studies are needed and are being carried out.

Best regards,

Günther Matschnigg
Senior Vice President
Safety, Operations & Infrastructure

21

90/8



**REPUBLIC OF MACEDONIA
CIVIL AVIATION AGENCY**

ICAO REGISTRY

E3/5

CNS/ARIS

09 JAN 16 03 20

Skopje, 16 January 2009
Our Ref.: 03-178/1 FOR:

Mr. Taïeb Chérif
Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec
Canada H3C 5H7

Fax: +1 514 954 6077

Your Ref.: E 3/5 - 08/69

**Subject: Draft ICAO Position on items of interest to aviation
on the agenda of the International Telecommunication
Union (ITU) World Radiocommunication Conference
(2011) (WRC-11)**

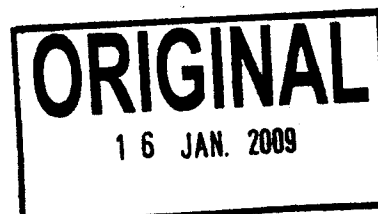
Dear Mr. Chérif,

I have the honour to refer to ICAO State Letter E 3/5 - 08/69 of 28 November 2008, in respect of the draft ICAO Position relating to the forthcoming International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11).

Herewith, please be advised that there are no comments on draft ICAO position for WRC-11 and that the statements therein are strongly supported by the by the Civil Aviation Agency of the Republic of Macedonia.

Accept, dear Sir, the assurances of my highest consideration.

Zoran KRSTEVSKI



1591825333

2019



REPUBLIC OF POLAND
PRESIDENT
CIVIL AVIATION OFFICE

Grzegorz Kruszyński

ORIGINAL REGISTRY:

Warsaw, 30 January 2009

FILED:

SENT TO:

E3/5
CNS/AIRS

09 FEB -2 08 52

COPY FOR:

ULC-LEP-5/0830-00071/01/2008

Dr. Taïeb Chérif
Secretary General of ICAO



000000091349

Dear Mr. Secretary General,

I would like to appreciate and express my gratitude for the work done by ICAO Secretariat in developing the *Draft Position on items of interest to aviation on the agenda of the ITU World Radiocommunication Conference (WRC-11)*, sent for consultation in your letter E 3/5-08/69 of 28 November 2008.

Nevertheless, I cannot agree to delete the footnote no. 5.362B (WRC-11 agenda item 1.1), concerning the use of the band 1559-1610 MHz nor to remove the name of Poland from the footnote, because this band is used in Poland by the military fixed tactical lines.

Due to the reason stated above I kindly ask you to change the draft ICAO position accordingly.

Please accept, Mr. Secretary General, the assurances of my highest consideration.



1861754985



CIVIL AVIATION
DIRECTORATE
OF THE REPUBLIC
OF SERBIA

2020

INTERNATIONAL CIVIL AVIATION ORGANIZATION

Mr. Taïeb Chérif
The Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec
Canada H3C 5H7

Reference: E 3/5-08/69

02 February 2008

Mr. Taïeb Chérif. 5206-0001/2009-0003

Subject: Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)

Dear Sir,

The Civil Aviation Directorate of the Republic of Serbia, in the capacity of the Aviation Authority of the Republic of Serbia, presents its compliments to the Secretary General of the International Civil Aviation Organization and has the honor to provide the following information:

The Republic of Serbia supports ICAO Position for the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11).

The Civil Aviation Directorate of the Republic of Serbia avails itself of this opportunity to renew to the Secretary General of International Civil Aviation Organization the assurances of its highest consideration.

With respect,

Director General

Nebojša Starčević
Nebojša Starčević

NOTE: Copy of this letter will be sent to you by postal mail


Luftfartstilsynet

Civil Aviation Authority - Norway

CENTRAL REGISTRY:

FILE NO:

E3/5

SENT TO:

CWS/ABR

09 FEB -9

Handled by 16
Namik Resulbegovic

Our reference:

200804145-4/501/NRE

Our date:

9 February 2009

COPY FOR:

Direct dial:
+47 98261681Your reference:
E 3/5-08/69Your date:
28 November
2008
 ICAO
999 University Street
MONTREAL, QUEBEC
Canada H3C 5H7

Sent by fax only +1 514-954-6077

Subject: Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011)(WRC-11)

Dear Sir,

With reference to your letter E 3/5-08/69 of 28 November 2008, I have the honour to inform you the following:

The Civil Aviation Authority - Norway does at the moment have no comments to the draft ICAO Position for the ITU WRC-11. We are participating in a national forum to clarify the Norwegian position. In this work we will actively bring forward the ICAO position.

Accept Sir, the assurances of my highest consideration.

Yours sincerely,

 Hege Aalstad
Head of section
Legal Department

SENT DIRECT

417672889

ORIGINAL

09 FEB. 2009



Bundesministerium für Verkehr, Bau und Stadtentwicklung • Postfach 20 01 00, 53170 Bonn

The Secretary General
International Civil Aviation
Organization
999 University Street
Montreal, Quebec
Canada, H3C 5H7

HAUSANSCHRIFT Robert-Schuman-Platz 1, 53175 Bonn

POSTANSCHRIFT Postfach 20 01 00, 53170 Bonn

TEL 0228 300-4828

FAX 0228 300-1454

BEARBEITET VON Doris Totzek

Referat LR 12

E-MAIL doris.totzek@bmvbs.bund.de

Ref-LR12@bmvbs.bund.de

INTERNET www.bmvbs.de

SUBJECT **Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)**

REFERENCE ICAO State letter – E 3/5-08/69 – of 28 November 2008
AZ 61322.2/5

DATUM **Bonn, 11 February 2009**

Sir/Madam,

In general, the draft ICAO Position for ITU WRC-11 as presented in the above referenced State Letter is supported. It should be noted, however, that Germany is currently in the process of developing its national position. The presented draft ICAO position is seen as an important input element for this activity. After a preliminary coordination with the relevant parties we would like to offer the following comments:

WRC Agenda Item 1.1

With regard to the protection of the radionavigation satellite service (RNSS) in the band 1 559 - 1 610 MHz from harmful interference that can be caused by stations operating in the fixed service, it should be noted that the protection of GPS as an essential element of GNSS is



SEITE 2 VON 3

achieved in Germany through the introduction of an appropriate guard band around the GPS L1 frequency. It is suggested to amend the text in the background section regarding the deletion of No. 5.362B in such a way that alternative means providing an adequate level of protection to GNSS are also addressed.

WRC Agenda Item 1.15

In the position box, the term „does not adversely affect” is seen to be ambiguous and should be replaced with a standard phraseology such as “shall not cause harmful interference”.

WRC Agenda Item 1.22

Under this agenda item WRC-11 is invited to examine the effect of emissions from short-range devices on radiocommunication services in accordance with Resolution 953. In order to ensure that radiocommunication services are adequately protected, this resolution resolves that further studies are required on the emissions from SRDs, inside and outside the frequency bands designated in the Radio Regulations for ISM applications. Since the studies on this agenda item have not been finalized in the ITU-R, it is not clear whether the current provisions in the Radio Regulations are adequate or a change of these regulations is required. It is therefore suggested to modify the position box accordingly.

WRC Agenda Item 1.23

In the position box, the term „does not adversely affect” is seen to be ambiguous and should be replaced with a standard phraseology such as “shall not cause harmful interference”.

WRC Agenda Item 4

WRC-07 agreed through its Resolution 97 to abrogate the following Resolutions 228, 544, 604 and 606. It is suggested to update the table “Resolutions” under this agenda item accord-



Bundesministerium
für Verkehr, Bau
und Stadtentwicklung

SEITE 3 VON 3 ingly.

Please accept the assurance of my highest consideration.

For the Federal Ministry of Transport,

Building and Urban Affairs

Doris Totzek

2023

Central Registry

From: Dirk-Olivier.von-der-Emden@bakom.admin.ch
Sent: 13 February 2009 3:59 AM
To: Central Registry
Cc: alexander.kuehn@bnetza.de
Subject: Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)

Attachments: CPGPTA(2009)027_Annex7_LS ICAO on AI 4.doc



CPGPTA(200
_Annex7_LS I

Your ref.: Ref.: E 3/5-08/69

Dear Sir/Madam,

Please find attached a liaison statement from CPT PTA of the Electronic Communications Committee (ECC) of the European Conference of Postal and Telecommunications Administrations (CEPT).

I stay at your disposal for any questions.

Best regards,

Dirk-Oliver von der Emden

Dirk-Oliver von der Emden, LL.M. (Durham) Legal and Economic Affairs Frequency Management

Federal Office of Communications OFCOM
Zukunftstrasse 44, 2501 Biel-Bienne

Federal Department of the Environment,
Transport, Energy, and Communication DETEC

Tel. +41 32 327 57 04

Fax. +41 32 327 57 77

mailto:dirk-olivier.von-der-emden@bakom.admin.ch

CENTRAL REGISTRY:

FILE NO: E3/5

SENT TO: CONSULERS

09 FEB 13 09 14

COPY FOR:

<<CPGPTA(2009)027_Annex7_LS ICAO on AI 4.doc>>

SENT DIRECT

879100846





CPG PTA

Attn.:

International Civil Aviation
Organization (ICAO)
Secretariat General
999 University Street
Montreal, Quebec
Canada H3C 5H7
(e-mail: icaohq@icao.int)

Your ref.: Ref.: E 3/5-08/69

Subject: Draft ICAO Position on items of interest to aviation on the agenda of the
International Telecommunication Union (ITU) World Radiocommunication Conference
(2011) (WRC-11)

Dear Sir/Madam,

CPG PTA was informed at its January 2009 meeting (see CPGPTA(2009)INFO08) about the draft ICAO position for the ITU WRC-11. The preparation on Agenda item 4 is included in its responsibility for the preparation of European common proposals within the European Conference of Postal and Telecommunications Administrations (CEPT).

CPG PTA reviewed the draft position of ICAO on Agenda item 4 and wishes to bring its comments to the attention of ICAO.

CPG PTA thanks ICAO for its good work and its advancement in reviewing WRC Resolutions and Recommendations on Agenda item 4.

Nevertheless it was noted by the project team that Resolution 228 and 544 and Recommendation 604 and 606 have been abrogated at the last world radio conference by Resolution 97 (Rev. WRC-07).

We look forward continuing the good co-operation with your organisation.

Yours sincerely,

Dirk-Oliver von der Emden
CPG PTA Chairman
(e-mail: dirk-olivier.von-der-emden@bakom.admin.ch)

Cc:

Mr Alexander Kühn

CEPT Coordinator on WRC-11 A.I. 2 & 4
Federal Network Agency – BNetzA
Tulpenfeld 4
53113 Bonn
Germany
(e-mail: alexander.kuehn@bnetza.de)



**REPRESENTATION OF ARGENTINA
ON THE COUNCIL OF THE
INTERNATIONAL CIVIL AVIATION ORGANIZATION**

999 University Street, Suite 15.20
Montreal, Quebec H3C 5J9

Tel.: (514) 954 8250
Fax: (514) 954 5732
E-mail: argentina@icao.int

2024
OSG
16 FEB. 2009

Montreal, 13 de febrero de 2009.

SEÑOR SECRETARIO GENERAL DE LA OACI

Tengo el agrado de dirigirme a usted en referencia con su comunicación E 3/5-08/69, de 28 de noviembre de 2008, concerniente a 'Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011)(WRC-11) (2008/69)'.

Al respecto, la Autoridad Aeronáutica Argentina no emite comentarios a la postura presentada por la Organización Internacional de Aviación Civil.

En la oportunidad reitero al Señor Secretario General las expresiones de mi más distinguida consideración.

Alberto Miguel SINGH
Representante de Argentina en el Consejo de la OACI

Dr. Taïeb Chérif
Secretario General de la OACI
Sala 12.14

ARG 10-02/09

2025

CENTRAL REGISTRY:

FILE NO: E315

SENT TO: CNS/AIRS

M.BRUCE

09 FEB 20 09 10

JOB NO E09-0607

COPY FOR:

KAZAKHSTAN

Astana, [date illegible] 2009

Civil Aviation Committee

17-1-17-15/16 3

Ref. : E 3/5-08/69, dated 28 November 2009

Sir,

Having reviewed the draft ICAO Position relating to the International Telecommunication Union World Radiocommunication Conference (2011) (WRC-11), the Civil Aviation Committee of the Ministry of Transport and Communications of the Republic of Kazakhstan would like to inform you that it has no comments to make on the proposed ICAO position.

Accept, Sir, etc. ...

1229935091

SENT DIRECT

[sgd] M. Kubayev
Chairman

Secretary General
ICAO
Montreal





transport

Department:
Transport
REPUBLIC OF SOUTH AFRICA

Private Bag X193, PRETORIA, 0001, Forum Building, cor Struben and Bosman Streets, PRETORIA

TO: The Secretary - General
ICAO
999 University Street
Montreal, Quebec
CANADA
H3C 5H7

Johannah Sekele

TEL: 27 12 309 3760

FAX: 27 12 309 3529

E-MAIL: multilateral@dot.gov.za

FAX NO: 00 1514 954 6077

20 February 2009

**SUBJECT: DRAFT ON ICAO'S POSITION ON ITEMS OF INTEREST TO THE
AVIATION ON THE AGENDA OF THE INTERNATIONAL
TELECOMMUNICATION UNION RADIO COMMUNICATION CONFERENCE
(2011)(WRC-11)**

1. The Department of Transport of the Republic of South Africa presents its compliments to the International Civil Aviation Organization and has the honour to refer your state letter Ref: SL 3/5-08/69 dated 28 November 2008 regarding the above-mentioned matter.
2. Kindly be informed that South Africa has noted the contents of the above-mentioned State Letter and has no input currently. UP
3. The Department of Transport of the Republic of South Africa avails itself of the opportunity to renew to the International Civil Aviation Authority the assurances of our highest consideration.

Yours sincerely


for **DIRECTOR-GENERAL: TRANSPORT**



transport

Department:
Transport
REPUBLIC OF SOUTH AFRICA

Private Bag X193, PRETORIA, 0001, Forum Building, cor Struben and Bosman Streets, PRETORIA

ACKNOWLEDGEMENT OF RECEIPT

ON RECEIPT, PLEASE RETURN THIS ACKNOWLEDGEMENT BY FAX OR E-MAIL

TO: Ms. Johannah Sekele

FAX NO: +27 12 309 3922

E-MAIL: sekelej@dot.gov.za

ORGANIZATION: ICAO

Hereby acknowledges the receipt of Republic of South Africa response to the following ICAO State Letter:

REF NO: SL 3/5-08/69

**SUBJECT: DRAFT ON ICAO'S POSITION ON ITEMS OF INTEREST TO
THE AVIATION ON THE AGENDA OF THE INTERNATIONAL
TELECOMMUNICATION UNION RADIO COMMUNICATION
CONFERENCE (2011) (WRC)**

NAME OF RESPONSIBLE PERSON:.....

SIGNATURE:

DATE:.....

2027



UNITED STATES MISSION
TO THE
INTERNATIONAL CIVIL AVIATION ORGANIZATION

TELEPHONE
(514) 954-8304

SUITE 14.10
999 UNIVERSITY AVENUE
MONTREAL, QUEBEC, CANADA
H3C 5J9

February 20, 2009

Dr. Taieb Chérif
Secretary General
Suite 12.15

Subject: State Letter E 3/5-08/69 dated November 28, 2008

Dear Dr. Chérif:

This is in response to ICAO State Letter E 3/5-08/69 requesting comments on the draft position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11). Noting that WRC-11 will not take place for approximately 33 months, the United States (U.S.) has not completed development of its views and proposals for all the agenda items. As a result, there are certain agenda items upon which the U.S. cannot comment at this time. Some U.S. views and proposals that are developed at a later date may not completely comport with the ICAO positions stated in this ICAO letter. At this point, however, the U.S. supports the ICAO positions as stated.

Please do not hesitate to call on me if you need further information.

With kindest regards,

A handwritten signature in black ink, appearing to read "Laura Faux-Gable", is written over a horizontal line.

Laura Faux-Gable
Alternate U.S. Representative

2028



CENTRAL REGISTRY:

FILE NO: E315
SENT TO: CNS/IAS

CIVILINĖS AVIACIJOS ADMINISTRACIJA 09 FEB 24 00 00

CIVIL AVIATION ADMINISTRATION COPY FOR:
REPUBLIC OF LITHUANIA

Mr. Taïeb Cherif
The Secretary General
International Civil Aviation
Organization

Date: 24.02.2009 Our ref. No. 12R-392(36)

28.11.2008 Your ref. No. E 3/5-08/69

Subject: Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)

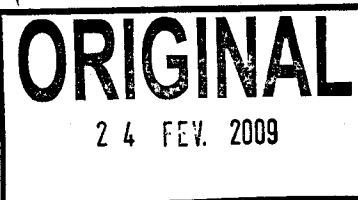
Dear Mr. Taïeb Cherif,

The Lithuanian CAA together with the Telecommunication Regulation Service (National Telecommunication Regulatory Authority) have looked into the ICAO position in the World Radiocommunication Conference and, hereby, informs you that have no comments and support the referred draft.

Accept the assurances of my highest consideration.

Director

Kęstutis Auryla



275019879

2029

Central Registry

From: Shadrack Wesechere [swesechere@kcaa.or.ke]
Sent: 24 February 2009 4:20 AM
To: Central Registry
Cc: Obeng, Mary A; rlubanga@kcaa.or.ke
Subject: DRAFT ICAO POSITION ON ITEMS OF INTEREST ON WRC-11

CENTRAL REGISTRY:

FILE NO: E3/5

SENT TO: CNS/ASRS

09 FEB 24 00 01

COPY FOR:

Mr. Taieb Cherif
ICAO Secretary General
999 University Street
Montreal, Quebec
Canada H3C 5H7

Dear Sir/Madam,

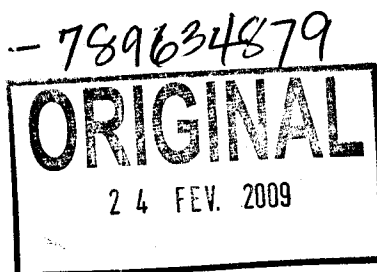
RE: DRAFT ICAO POSITION ON WRC 11

We have reviewed the ICAO Draft Position reference E 3/5-08/69 dated November 2008 and Kenya supports the position in its entirety.

We therefore have no additional comments on the position.

Accept, Sir /Madam, the assurances of my highest consideration.

Shadrack Wesechere,
Manager, Engineering Services,
Kenya Civil Aviation Authority,
JKIA-KAA Complex,
P.O. Box 30163,
Nairobi, Kenya.
Tel: +254 20827107,
Mobile: 0721 517968,
E-mail: swesechere@kcaa.or.ke
web: www.kcaa.or.ke



2030



THE REPUBLIC OF TURKEY
MINISTRY OF TRANSPORT
Directorate General of Civil Aviation

DGCA : B.11.1.SHG.0.12.01.02/304/.....**2679**

Ankara, 27 February, 2009

SUBJ. : Draft ICAO Position on items of interest to
aviation on the agenda of the WRC-11

Mr. Taleb Chérif
Secretary General,
ICAO (International Civil Aviation Organization)
999 University Street
Montreal, Quebec CANADA

CENTRAL REGISTRY:

FILE NO: **E3/5**

SENT TO: **CNS/ADRS**

09 FEB 27 12

COPY FOR:

REF. Your letter, E 3/5-08/69, dated 28 November 2008

Dear Mr. CHERIF,

Content of your referenced letter concerning "Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11)" was perused.

Taking into account the date of the meeting and ongoing studies for the conference, I would like to inform you that our studies within the internal bodies have not been finalized yet. After the completion of the studies, you will be informed about our final views and/or comments.

Accept, Sir, the assurances of my highest consideration.


G. Betül DOĞAN
Acting Deputy Director General
Civil Aviation

NP
SENT DIRECT
62084637

ORIGINAL
27 FEB. 2009



S-I045-10/9 (DW1173130-0)

27 February 2009

The Secretary General
International Civil Aviation Organisation
999 University Street
Montreal, Quebec H3C 5H7
CANADA

Dear Sir

Response to State Letter 08/69 – Draft ICAO Positions ITU World Radiocommunication Conference 2011

The New Zealand Aviation Spectrum Group (ASG) is sponsored by the CAA to provide a forum for the discussion, coordination and formulation of views from the New Zealand aviation sector on aeronautical spectrum issues.

The Group has developed a draft Position on WRC-11 Agenda Items relating to the aeronautical spectrum; this Position very closely aligns with the ICAO Position and, when finalised, will certainly be taken into account in forming the New Zealand Position for WRC-11.

The ASG position on aeronautical spectrum issues for WRC-07 was incorporated in its entirety into the NZ Position, and there is every reason to expect that the same will be the case for WRC-11.

The ASG may adjust its Position as a consequence of developments arising from amendments to the ICAO Position and, *inter alia*, from the outcomes of meetings of ICAO Working Group F and ITU(R) Working Party 5B.

A copy of the ASG draft Position is attached for your information.

It is anticipated that the CAA will have direct representation at the Asia Pacific Telecommunity Preparatory Group meetings leading up to WRC-11. Subject to any differences with the ASG or New Zealand Positions, the CAA will strongly support the ICAO Position at these and other forums.

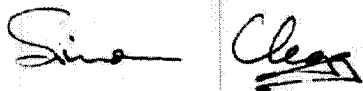
New Zealand's Focal Point for WRC-11 matters is:

Mr Toby Farmer
Aeronautical Services Officer
Aeronautical Services Unit
Civil Aviation Authority of New Zealand

Contact details:

Tel: +64 4 560 9583; Fax +64 4 569 2024; email farmert@caa.govt.nz.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Simon Clegg', with a stylized flourish at the end.

Simon Clegg
General Manager
Government Relations, Planning and Strategy

DRAFT

**New Zealand Aviation
Common Position on
WRC-11 Agenda Items**

Prepared by:

Aviation Spectrum Group

December 2008

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DRAFT

**New Zealand Aviation Spectrum Group:
common position for WRC-11**

1. Introduction

The New Zealand aviation common position for the 2011 World Radio Conference (WRC-11) has been prepared by the New Zealand Aviation Spectrum Group (ASG). The ASG comprises representatives from the aviation community in New Zealand who have a prime interest in the use of the radio spectrum by aviation, either as users or as spectrum and frequency regulatory experts.

Aviation requires access to appropriate, protected radio spectrum in order to maintain safe and efficient flight operations, to protect essential safety of life services from growing threats of harmful interference and to implement new technologies necessary to meet future growth and security requirements in the context of air to ground communications (covering air traffic services, aeronautical communications and airline public correspondence), navigation and surveillance operations. This is best achieved through access to adequate amounts of globally harmonized radio spectrum allocations.

2. WRC-11 Agenda Items of interest to the Aviation Spectrum Group

2.1 Agenda Items of direct and indirect interest

The agenda for WRC-11 contained in Resolution 805 (WRC-07) includes 25 specific agenda items and 8 standing items. Of the specific agenda items, the following are of direct interest to aviation:

Agenda Items: 1.1, 1.3, 1.4, 1.7 and 1.21.

The following agenda items are being followed by the aviation community in order to ensure aviation interests are taken account in decisions to meet the needs of other services:

Agenda Items: 1.2, 1.5, 1.12, 1.14, 1.23 and 1.25.

In addition standing items 8.1, the Report of the Director of the Radiocommunication Bureau, and 8.2, agendas for future conferences, are of interest; however, views and positions will not be formulated until after CPM-11.

2.2 Agenda Item 1.1

to consider and take appropriate action on requests from administrations to delete their country footnotes or to have their country name deleted from footnotes, if no longer required, taking into account Resolution 26 (Rev. WRC-07);

Background:

States add footnotes to the tables of frequency allocations in the International Radio Regulations to indicate alternate usage of the subject band in their countries. There is a general trend and effort to delete such footnotes wherever possible. For aviation the bands in which the deletion of the country footnotes is appropriate are:

- 255 – 526.5 kHz (Non-directional beacons).
- 74.8 – 75.2 MHz band (Marker beacons).
- 108 – 117.95 MHz band (ILS, VOR and Aeronautical Mobile (Route) Service).
- 328.6 – 335.4 MHz band (Glide Path).
- 1 215 – 1 300 MHz (Radionavigation Service).
- 1 559 – 1 610 MHz (Radionavigation Satellite Service).
- 4 200 – 4 400 MHz (Airborne Radio Altimeters).

NZ ASG position:

To support the ICAO position and encourage countries to remove their names from footnotes through which allocations are made to non-aeronautical services in bands that are allocated world-wide to aeronautical services.

Draft ICAO position:

To support the deletion of No 5.72 as access to these bands by the fixed service could create the potential for harmful interference to important radionavigation systems used by aircraft to navigate especially in the North Sea.

To support deletion of Nos. 5.181, 5.197 and 5.259, as access to these bands by the mobile service is not feasible and could create the potential for harmful interference to important radionavigation systems used by aircraft at final approach and landing as well as the aeronautical mobile service introduced as a result of WRC-03 and 07.

To support deletion of No. 5.330 as access to the band by the fixed and mobile services could potentially cause harmful interference to services used to support aircraft operations.

To support the deletion of Nos. 5.362B and 5.362C as of 2011 in order to remove harmful interference that can be caused by the fixed service to essential aeronautical radionavigation satellite functions in the band 1 559 - 1 610 MHz and to permit the full utilization of RNSS services to aircraft on a global basis.

To support deletion of No. 5.439 as a measure to protect safety critical operation of radio altimeters in the band 4 200 - 4 400 MHz.

2.3 Agenda Item 1.2

taking into account the ITU-R studies carried out in accordance with Resolution 951 (Rev. WRC-07), to take appropriate action with a view to enhancing the international regulatory framework;

Background:

It is widely understood and accepted that ways have to be found so that new users and new services can be accommodated in what is already heavily congested spectrum. Some administrations hold the view that the current ITU-R processes for addressing additional spectrum needs are not timely enough to meet the requirements of industry.

Resolution 951 seeks to review the way in which spectrum at the global level is managed with the objective of developing new practices which will lead to improved efficiency in the way spectrum can be assigned and used.

The aviation community has concerns that new concepts of spectrum management could impact on the access to the spectrum as it is currently enjoyed by aviation, particularly if liberalization of spectrum use or spectrum access were to result in interference to aeronautical services. Studies under Resolution 951 potentially offer aviation an opportunity to improve the flexibility with which spectrum allocated to aeronautical services can be used as well as to tighten the regulatory provisions for the protection of aviation systems. For example, while improvements in spectral efficiency would result from broadening the definitions of the aeronautical services in the Radio Regulations, compensating regulatory action would also be required to protect aviation systems in view of increased risk for interference due to the greater flexibility of use.

NZ ASG position:

To support proposals for new provisions based on Resolution 951 studies that:

- a) Neither impact adversely on access to the spectrum by aeronautical services nor are likely to lead to increased levels of interference to these services.*
- b) Improve flexibility in the use of allocations for aeronautical services while enhancing their protection through, for example, more broad-based definitions of aeronautical services in the Radio Regulations.*

Draft ICAO position:

Support new provisions or modifications to existing provisions that improve the flexibility with which spectrum allocated to aeronautical safety services can be used by aviation or tighten regulatory provisions that enhance the protection of aviation systems.

Ensure that any other measures taken at WRC-11 under Agenda Item 1.2 do not have an adverse impact on the protection of aeronautical systems.

2.4 Agenda Item 1.3

to consider spectrum requirements and possible regulatory actions, including allocations, in order to support the safe operation of unmanned aircraft systems (UAS), based on the results of ITU-R studies, in accordance with Resolution 421 (WRC-07);

Background:

Advances in aviation technology and electronics over recent years have lead to renewed interest in Unmanned Aircraft Systems (UAS) for civilian as well as military applications, especially for applications that are repetitive, routine and of long duration or where there is an increased level of danger. UAS consist of two main elements; Unmanned Aircraft (UA) and associated Control Stations (CS) used for remote mission control of the flight. UAs were previously known as Unmanned Aerial Vehicles (UAVs) and are aircraft that do not carry a human pilot and may be either controlled remotely or fly under their own control.

To date, the use of a UAS has often been as UAs substituting for traditional piloted aircraft but increasingly UAS are being deployed on applications which otherwise would be uneconomic, too monotonous or too risky for manned aircraft. UAS deployments have been demonstrated or proposed for a wide range of civilian applications including surveillance, scientific and economic research especially in agriculture and environmental management, communication relays, aerial reconnaissance and mapping, disaster relief and emergency management communications, traffic monitoring and control and law enforcement.

UAs currently are restricted to operate in segregated airspace separate from other air traffic; that is, in airspace designated for exclusive use of specific users. However, as demand grows for new UAS applications, ensuring the safe operation of UAs outside segregated airspace raises issues both from an air traffic management (ATM) perspective and of spectrum use that need to be resolved.

This agenda item seeks to identify the spectrum necessary to support the safe operation of UASs in current and future airspace structures including command and control, ATC relay and sense and avoid functions. While Resolution 421 (WRC-07) invites the ITU-R to prepare a report or recommendation on how to accommodate the radiocommunication requirements for UAS payloads, it is clear that under Agenda Item 1.3 WRC-11 is not required to take any action on spectrum for UAS payloads.

NZ ASG position:

To support the use of existing or new allocations to AM(R)S, AMS(R)S and/or ARNS in order to satisfy spectrum needs for UAS applications excluding spectrum for payload requirements while taking into account the need to protect and safeguard existing aeronautical systems.

Draft ICAO position:

To support, based on the results of studies identified in Resolution 421, any modification to existing allocations, or new allocations required to accommodate UAS operations in non-segregated airspace while maintaining the safety and regularity of flight of all types of aircraft.

Accordingly, to ensure that allocations used, in particular, for UAS command and control, ATC relay and sense and avoid in non-segregated airspace are in the AM(R)S, AMS(R)S and/or ARNS and do not adversely affect existing aeronautical systems.

To oppose the use of this agenda item to seek new spectrum allocations to meet payload requirements.

2.5 Agenda Item 1.4

to consider, based on the results of ITU-R studies, any further regulatory measures to facilitate introduction of new aeronautical mobile (R) service (AM(R)S) systems in the bands 112 -117.975 MHz, 960 - 1 164 MHz and 5 000 - 5 030 MHz in accordance with Resolutions 413 (Rev. WRC-07), 417 (WRC-07) and 420 (WRC-07);

Background:

WRC-11, Agenda Item 1.4 requires completion of studies under Resolutions 413 and 417 and proposals for any additional regulatory measures required to facilitate the introduction of new AM(R)S systems in the bands 112 - 117.975 and 960 - 1 164 MHz. Additionally it allows, under Resolution 420, proposals to be made for a new allocation to AM(R)S in the frequency band 5 000 - 5 030 MHz for surface applications at airports provided that requirements for that system cannot be satisfied in the 5 091 - 5 150 MHz band, and that it is compatible with RNSS in the 5 000 - 5 030 MHz band and the radio astronomy service (RAS) in the adjacent 4 990 -5 000 MHz band.

It should be noted that the existing AMS(R)S allocation in the 5 000 - 5 030 MHz band may be considered for unmanned aircraft systems as part of WRC-11, Agenda Item 1.3.

NZ ASG position:

To support regulatory provisions that facilitate the introduction of future AM(R)S systems based on studies under Resolutions 413 and 417 in the bands 112 – 117.975 MHz and 960 – 1 164 MHz and under Resolution 420 for the band 5 000 – 5 030 MHz, including if necessary a new AM(R)S allocation.

Draft ICAO position:

To support as required, based on the results of studies identified in Resolution 413, the inclusion in the Radio Regulations of further regulatory measures that will facilitate the introduction of future AM(R)S systems in the band 112 - 117.975 MHz.

To support as required, based on the results of studies identified in Resolution 417, the inclusion in the Radio Regulations of further regulatory measures that will facilitate the introduction of future AM(R)S systems in the band 960 - 1 164 MHz.

If the spectrum requirements for surface applications at airports cannot be fully accommodated within the 5 091 - 5 150 MHz band, and based on the results of successful compatibility studies identified in Resolution 420, support a new allocation to the AM(R)S in the band 5 000 - 5 030 MHz.

2.6 Agenda Item 1.5

to consider worldwide/regional harmonization of spectrum for electronic news gathering (ENG), taking into account the results of ITU-R studies, in accordance with Resolution 954 (WRC-07);

Background:

This agenda item seeks to address the spectrum needs associated with the use of portable and re-locatable radio equipment for electronic news gathering (ENG) purposes. The scope of this agenda item is not limited in terms of frequency bands within which studies can take place and aeronautical bands could become a target.

NZ ASG position:

To oppose proposals for allocation or spectrum identification for ENG applications that has the potential to impact adversely on the operation of aeronautical systems.

Draft ICAO position:

To oppose any allocation that would adversely affect the interests of aviation.

2.7 Agenda Item 1.7

to consider the results of ITU-R studies in accordance with Resolution 222 (Rev. WRC-07) in order to ensure long-term spectrum availability and access to spectrum necessary to meet requirements for the aeronautical mobile-satellite (R) service, and to take appropriate action on this subject, while retaining unchanged the generic allocation to the mobile-satellite service in the bands 1 525 - 1 559 MHz and 1 626.5 - 1 660.5 MHz;

Background:

This agenda item addresses concerns held by the aviation community that stem from the decision taken at WRC-97 to adopt generic MSS allocations in the 1 525 - 1 559 MHz and 1 626.5 - 1 660.5 MHz bands to replace the previous exclusive AMS(R)S allocations. To offset the loss of exclusive AMS(R)S allocations, WRC-97 also adopted No 5.357A which gives priority and protection to AMS(R)S in the MSS sub-bands 1 545 - 1 555 MHz and 1 646.5 - 1 656.5 MHz.

Although No. 5.357A gives priority status for AMS(R)S versus other MSS, in practice the current application of the regulatory conditions governing such priority status does not satisfy spectrum requirements for AMS(R)S. It is this situation which has raised strong concerns for the civil aviation community.

Moreover, it should also be noted that since 1997, the allotment of spectrum to mobile-satellite service providers has been effected under the provisions of various regional Memoranda of Understanding (MoU). The allotments agreed under the provisions of these MoUs are not available in the public domain and are not known to the aviation community or even to ICAO. This makes it virtually impossible for aviation to develop long-term plans for using this spectrum. It is also understood that ICAO is of the view

that the current provisions and procedures for AMS(R)S under these MoUs are insufficient to satisfy known future demand for AMS(R)S spectrum.

Taking into account the number of aircraft already equipped with ICAO standardized AMS(R)S technology, the AMS(R)S spectrum needs under this agenda item should be accommodated in the bands under No. 5.357A. Only if the long-term needs cannot be satisfied in those bands should additional spectrum be made available in other frequency bands. Also, depending on decisions taken by WRC-11, consequential action may be required to ensure the provisions contained in Resolution 222 that clarify the protection of AMS(R)S in the bands 1 525 - 1 559 MHz and 1 626.5 - 1 660.5 MHz are retained.

NZ ASG position:

To support new regulatory provisions to ensure that the priority access for AMS(R)S to the bands 1 545 - 1 555 MHz and 1 646.5 - 1 656.5 MHz as established in Resolution 222 can be realised in practice and that long term requirements for AMS(R)S can be satisfied. Also, depending upon decisions taken by WRC-11, to support consequential regulatory changes that safeguard spectrum access for AMS(R)S.

Draft ICAO position:

Taking into account the results of ITU-R studies, support further regulatory provisions to strengthen AMS(R)S access to the bands 1 545 - 1 555 MHz and 1 646.5 - 1 656.5 MHz including, if required, changes to No. 5.357A, No. 5.362A and Resolution 222.

If the studies identified by Res. 222 (Rev. WRC-07) indicate that the long term needs of AMS(R)S cannot be satisfied in the bands 1 545 - 1 555 MHz and 1 646.5 - 1 656.5 MHz, then support AMS(R)S in other frequency bands through appropriate regulatory provisions.

2.8 Agenda Item 1.12

to protect the primary services in the band 37 - 38 GHz from interference resulting from aeronautical mobile service operations, taking into account the results of ITU-R studies, in accordance with Resolution 754 (WRC-07);

Background:

Although there are no aeronautical mobile systems currently deployed in the frequency band 37 – 38 GHz, there are studies underway in the ITU-R on the use of wireless networks within aircraft known as wireless avionics intra-communications (WAIC) systems that may operate in this band. WAIC systems could be designed and implemented such that they are compatible with existing systems with co-primary service allocations in the 37 – 38 GHz band.

Until the ITU-R studies have shown that the 37 – 38 GHz band is not suitable for WAIC systems there should be no change made to the existing primary mobile service allocation in this band.

NZ ASG position:

Pending the outcome of ITU-R studies on WAIC systems, to support retention of the mobile service primary allocation without change in the band 37 – 38 GHz.

Draft ICAO position:

To oppose excluding aeronautical use of the existing mobile service allocation in the band 37 - 38 GHz.

To support the use of technical protection limits to ensure that any future AMS system in the band 37 - 38 GHz will be compatible with other co-primary services.

2.9 Agenda Item 1.14

to consider requirements for new applications in the radiolocation service and review allocations or regulatory provisions for implementation of the radiolocation service in the range 30 - 300 MHz, in accordance with Resolution 611 (WRC-07);

Background:

This agenda item seeks to identify suitable VHF spectrum to accommodate the needs of radar systems in the radiolocation service. On the one hand radar systems are under pressure from systems of the fixed and mobile services and on the other hand resolution and range requirements for new radar applications are increasing the demand for new spectrum for the radiolocation service.

Aviation operates a number of services in the frequency range 30 - 300 MHz including the instrument landing system (ILS), VHF omni-directional ranging (VOR) and air-ground communications. It is essential that these systems continue to be afforded protection under safety of life service provisions in particular within the frequency bands listed below:

74.8 - 75.2 MHz	Marker beacons
108 - 112 MHz	ILS localizers, GBAS, VOR
112 - 117.975	VOR, GBAS, GRAS, air-ground communications
117.975 - 137 MHz	Air-ground communications

In addition, due to the potential for high-powered transmitters in the radiolocation service, compatibility studies should consider adjacent aeronautical bands, as well as those that could be impacted by spurious and harmonic emissions.

NZ ASG position:

Not to oppose proposals to satisfy VHF spectrum requirements for new applications in the radiolocation service provided that any changes to allocations and/or identifications made under this agenda item do not impact adversely on the operation of aeronautical systems especially in bands between 74.8 MHz and 137 MHz.

Draft ICAO position:

Oppose, under this agenda item, any change to the allocations in the 74.8 - 75.2 MHz, and/or 108 - 137 MHz bands.

Ensure that any allocation made as a result of this agenda item does not adversely affect the operation of existing and planned aeronautical systems.

2.10 Agenda Item 1.21

to consider a primary allocation to the radiolocation service in the band 15.4 - 15.7 GHz, taking into account the results of ITU-R studies, in accordance with Resolution 614 (WRC-07);

Background:

This agenda item seeks to provide additional spectrum via a primary allocation to the radiolocation service for new radar systems in the band 15.4 - 15.7 GHz. The band is used by aeronautical radar systems (ground and airborne) operating under the ARNS allocation. In aviation, these radars are used in precision monitoring, approach and surface detection functions as well as for airborne weather radar (AWR) systems. AWR is used to give warning of hazardous weather to ensure safe separation of aircraft from hazardous weather conditions. In most countries it is mandatory for commercial and passenger transport aircraft to be equipped with AWR.

A primary allocation for the radiolocation service in these bands should only proceed if ITU-R studies conclude that sharing with the aeronautical radars is feasible. Moreover, such an allocation should be on the basis that the radiolocation service shall not cause harmful interference to nor claim protection from the aeronautical radionavigation service.

NZ ASG position:

Provided ITU-R studies show that sharing is feasible between radiolocation and aeronautical radionavigation systems in the band 15.4 – 15.7 GHz, not to oppose a primary allocation to the radiolocation service in this band.

Draft ICAO position:

Accept the primary allocation of the radiolocation service in the band 15.4 - 15.7 GHz, on the basis of agreed studies showing compatibility which take into account the protection of the use of this band by aviation.

Any allocation to the radiolocation service in this band shall be made with the condition that no harmful interference is caused to the aeronautical radionavigation service and that no protection is required to the radiolocation service from the aeronautical radionavigation service.

2.11 Agenda Item 1.23

to consider an allocation of about 15 kHz in parts of the band 415 - 526.5 kHz to the amateur service on a secondary basis, taking into account the need to protect existing services;

Background:

Aeronautical non-directional beacons (NDB) of the aeronautical radionavigation service are expected to continue to operate in the short to medium term in parts of the band specified in this agenda item. Protection for these systems will be required if a secondary allocation is made to the amateur service.

NZ ASG position:

Not to oppose a secondary allocation for the amateur service provided appropriate protection is afforded to NDBs operating in the aeronautical radionavigation service.

Draft ICAO position:

To ensure that any allocation made to the amateur service cannot adversely affect the operation of aeronautical systems operating under allocations to the aeronautical radionavigation service.

2.12 Agenda Item 1.25

to consider possible additional allocations to the mobile-satellite service, in accordance with Resolution 231 (WRC-07);

Background:

This agenda item is to identify new allocations for the mobile satellite service in both the Earth-to-space and space-to-Earth directions with particular focus on the frequency range 4 - 16 GHz.

Care must be taken to ensure any action taken as a part of this agenda item does not impact existing AMS(R)S allocations, or any new allocations that may result under Agenda Items 1.3 or 1.7. The bad experiences that have resulted from the WRC-97 decisions to replace AMS(R)S allocations with generic MSS allocations must not be repeated.

Furthermore, it is also important that any new allocations for the MSS do not impact adversely on aeronautical systems within the aeronautical radionavigation service and aeronautical mobile (route) service. It is noted that preliminary studies within the ITU-R have already targeted a number of aeronautical bands, including those supporting safety of life applications, as potential candidate bands for new MSS allocations.

NZ ASG position:

To support the ICAO position and ensure that any new MSS allocations do not constrain existing or planned future aeronautical operations.

Draft ICAO position:

To oppose any allocation that would adversely affect the interests of aviation.

2032

Central Registry**From:** P K. Kapoor [pkkapoor@AAI.AERO]**Sent:** 2 March 2009 6:17 AM**To:** Central Registry**Cc:** Saraswati, Sujan; Li, Peng; J M JOLLY; Rajith Ali**Subject:** Comments on Draft ICAO Position on items of interest to Civil Aviation on WRC-11 Agenda Items**Attachments:** Position on WRC-11 Agenda Items(India).doc

CENTRAL REGISTRY:

FILE NO: E315

SENT TO: CNS/AERS

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COPY FOR:

Dear Sir,

Please refer your letter as per ICAO reference E-3/5-08/69 dated 28th November 2008 regarding Draft ICAO Position on items of interest to aviation on WRC-11 Agenda Items.

Since standing ICAO Resolution mandates all contracting states to firmly support ICAO policy on radio frequency spectrum matters, India will also extend necessary support for ICAO position at all regional and international activities conducted in preparation for WRC-11 and subsequently at WRC-11 also.

Accordingly, the position to be adopted in India for each WRC-11 Agenda Item having impact on aeronautical services is provided briefly in "**Comments**" Column. This position is strictly in line with ICAO Draft Position.

A comprehensive national position strictly in accordance with ICAO position is being adopted and forwarded to the Indian Regulator seeking firm support. AAI representative participating in the National Working Group Meetings will ensure continued protection for civil aviation interests.

With kind regards

P.K.Kapoor
General Manager (Com)

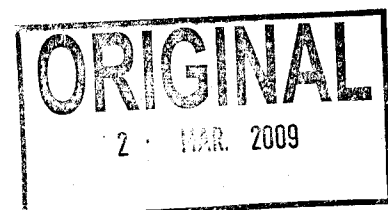
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2/03/09

Preliminary Position to be adopted at national level for WRC-11 in line with ICAO Draft Position

<i>Agenda Item</i>	<i>Agenda Item Title</i>	<i>Comments(Position to be adopted at National Level in India)</i>
1.1	To consider and take appropriate action on requests from administrations to delete their country footnotes or to have their country name deleted from footnotes, if no longer required, taking into account Resolution 26 (Rev. WRC-07).	ICAO Position is firmly supported. Efforts will be made for deletion of footnote No.5.330 (if no longer required) wherein access to the band 1215-1300 MHz is made in India for fixed and mobile services on a primary basis.
1.2	Taking into account the ITU-R studies carried out in accordance with Resolution 951 (Rev. WRC-07), to take appropriate action with a view to enhancing the international regulatory framework.	ICAO position is firmly supported for continued protection of aeronautical systems through new or modified regulatory provisions including tightening the existing provisions
1.3	To consider spectrum requirements and possible regulatory actions, including allocations, in order to support the safe operation of unmanned aircraft systems (UAS), based on the results of ITU-R studies, in accordance with Resolution 421 (WRC-07).	ICAO position is firmly supported with regard to UAS operations.
1.4	To consider, based on the results of ITU-R studies, any further regulatory measures to facilitate introduction of new aeronautical mobile (R) service (AM(R)S) systems in the bands 112 -117.975 MHz, 960 - 1 164 MHz and 5 000 - 5 030 MHz in accordance with Resolutions 413 (Rev. WRC-07), 417 (WRC-07) and 420 (WRC-07).	ICAO Position is fully supported for inclusion of further regulatory measures to facilitate introduction of new Aeronautical Mobile (R) Service (AM(R) S) in the proposed bands.
1.5	To consider worldwide/regional harmonization of spectrum for electronic news gathering (ENG), taking into account the results of ITU-R studies, in accordance with Resolution 954 (WRC-07).	ICAO Position is fully supported Any new allocation, if any, that would adversely affect the civil aviation interests will be resolutely opposed in the National Working Group Meetings.
1.7	To consider the results of ITU-R studies in accordance with Resolution 222 (Rev. WRC-07) in order to ensure long-term spectrum availability and access to spectrum necessary to meet requirements for the aeronautical mobile-satellite (R) service, and to take appropriate action on this subject, while retaining unchanged the generic allocation to the mobile-satellite service in the bands 1 525 - 1 559 MHz and 1 626.5 - 1 660.5 MHz.	ICAO position is fully supported including changes, if required, to relevant footnotes or support for appropriate regulatory provisions based on studies.
1.9	To revise frequencies and channelling arrangements of Appendix 17 to the Radio Regulations, in accordance with Resolution 351 (Rev. WRC-07), in order to implement new digital technologies for the maritime mobile service.	ICAO Position is fully supported. Regulator will be approached to ensure that revision of frequencies and channeling arrangements, if proposed, of Appendix 17 to Radio

		Regulations does not cause any harmful interference to the aeronautical mobile (R) service.
1.12	To protect the primary services in the band 37 - 38 GHz from interference resulting from aeronautical mobile service operations, taking into account the results of ITU-R studies, in accordance with Resolution 754 (WRC-07).	ICAO Position is fully supported for the continued protection of band 37-38 GHz allocated for aeronautical mobile (R) service.
1.14	To consider requirements for new applications in the radiolocation service and review allocations or regulatory provisions for implementation of the radiolocation service in the range 30 - 300 MHz, in accordance with Resolution 611 (WRC-07).	ICAO position is fully supported with regard to new allocation for radiolocation service in the range 30-300 MHz. Bands allocated for aeronautical use in this range will be protected.
1.15	To consider possible allocations in the range 3 - 50 MHz to the radiolocation service for oceanographic radar applications, taking into account the results of ITU-R studies, in accordance with Resolution 612 (WRC-07).	ICAO position is fully supported. It will be ensured that any new allocation in the frequency range 3-50 MHz to radiolocation service for oceanographic radar does not adversely affect the operation of existing and planned aeronautical systems.
1.19	To consider regulatory measures and their relevance, in order to enable the introduction of software-defined radio and cognitive radio systems, based on the results of ITU-R studies, in accordance with Resolution 956 (WRC-07).	ICAO position is fully supported for the inclusion of necessary regulatory measures in the Radio Regulations to enable the introduction of software-defined radio and cognitive radio systems
1.21	To consider a primary allocation to the radiolocation service in the band 15.4 - 15.7 GHz, taking into account the results of ITU-R studies, in accordance with Resolution 614 (WRC-07).	ICAO Position is supported. Primary allocation of the radiolocation service in the band 15.4-15.7 GHz may be considered on the basis of agreed compatible studies with a condition that no harmful interference is caused to the aeronautical radionavigation service and also no protection is required.
1.22	To examine the effect of emissions from short-range devices on radiocommunication services, in accordance with Resolution 953 (WRC-07).	ICAO position vis-à-vis operation of short-range devices is accepted.
1.23	To consider an allocation of about 15 kHz in parts of the band 415 - 526.5 kHz to the amateur service on a secondary basis, taking into account the need to protect existing services.	ICAO position is supported. Accordingly, it will be ensured that any allocation made to amateur service in parts of band 415-526.5 kHz on secondary basis cannot adversely affect the operation of

		aeronautical systems.
1.25	To consider possible additional allocations to the mobile-satellite service, in accordance with Resolution 231 (WRC-07).	ICAO position to oppose any additional allocation to mobile-satellite service that would adversely affect the interests of civil aviation
4	In accordance with Resolution 95 (Rev. WRC-03), to review the resolutions and recommendations of previous conferences with a view of possible revision, replacement or abrogation.	The review of the resolutions and recommendations of previous conferences with a view of possible revision, replacement or abrogation is accepted in line with the stated ICAO position

Action proposed in India:

Indian Regulator has already included Civil Aviation representatives in the concerned National Working Group constituted for the study period 2007-2011 for WRC-11, which will undertake studies on agenda items having impact on aeronautical services. Representatives actively participate in the deliberations to protect civil aviation interests at national level and to seek support for ICAO position in WRC-11. Accordingly, a national position strictly in line with above stated ICAO position will be adopted and is being forwarded to Indian Regulator eliciting firm support in regional and other international activities conducted in preparation for WRC-11 and subsequently at WRC-11.

2033

Central Registry

From: Greigeritsch Susanne [Susanne.Greigeritsch@bmvit.gv.at]
Sent: 2 March 2009 4:01 AM
To: Central Registry
Cc: Delegation, ABIS
Subject: State letter No. 69/08

CENTRAL REGISTRY:
FILE NO: E3/5
SENT TO: CNS/ATRS
09 MAR -2 08 17

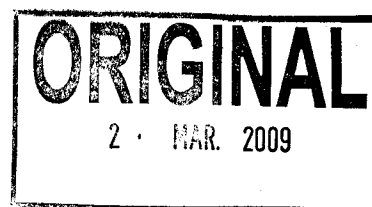
Subject: Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11) COPY FOR:

There are no comments from Austrian side to the above mentioned State letter.

NP

by order Susanne Greigeritsch
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2034



LE REPRÉSENTANT PERMANENT DU CANADA AU CONSEIL DE L'ORGANISATION DE L'AVIATION CIVILE INTERNATIONALE
PERMANENT REPRESENTATIVE OF CANADA ON THE COUNCIL OF THE INTERNATIONAL CIVIL AVIATION ORGANIZATION

La Maison de l'OACI, 999, rue University, bureau 1535, Montréal (Québec) H3C 5J9
"La Maison de l'OACI", 999 University Street, Suite 1535, Montreal, Quebec H3C 5J9

Téléphone / Telephone : (514) 954-5800
Facsimile / Télécopieur : (514) 954-5809

Notre dossier/Our file E 3/5-08/69

Montréal,
2 March 2009

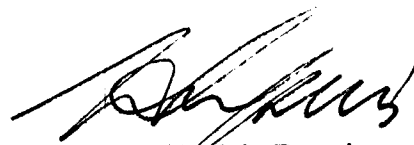
H. E. Dr. Taïeb Chérif
Secretary General
International Civil Aviation Organization
La Maison de l'OACI
Suite 12.15

Excellency :

I have the honor to refer to State letter 2008/69: *Draft ICAO Position on items of interest on the agenda of the ITU World Radiocommunication Conference.*

Canada has reviewed the above noted state letter and is in agreement without comments. Please find attached below Attachment B as requested. All previously filed differences remain valid.

I avail myself of this opportunity to renew to your Excellency the assurance of my highest consideration.


Lionel Alain Dupuis

see E 2035 (all reply)

ATTACHMENT B to State letter E 3/5-08/69

**RESPONSE FORM
TO BE COMPLETED AND RETURNED TO ICAO TOGETHER
WITH ANY COMMENTS YOU MAY HAVE ON THE PROPOSED
AMENDMENTS**

To: The Secretary General
International Civil Aviation Organization
999 University Street Montreal,
Quebec Canada, H3C 5H7

(State) Canada

Please make a checkmark (✓) against one option for each amendment. If you choose options "agreement with comments" or "disagreement with comments", please provide your comments on separate sheets. (Appendix A)

	<i>Agreement without comments</i>	<i>Agreement with comments*</i>	<i>Disagreement without comments</i>	<i>Disagreement with comments</i>	<i>No position</i>
Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011)	X				

* "Agreement with comments" indicates that your State or organization agrees with the intent and overall thrust of the amendment proposal; the comments themselves may include, as necessary, your reservations concerning certain parts of the proposal and/or offer an alternative proposal in this regard.

Signature [Signature] Date 2 March 2009

— END —

2035



MISSION PERMANENTE DU CANADA AU CONSEIL DE L'ORGANISATION DE L'AVIATION CIVILE INTERNATIONALE
PERMANENT MISSION OF CANADA ON THE COUNCIL OF THE INTERNATIONAL CIVIL AVIATION ORGANIZATION

La Maison de l'OACI, 999, rue University, bureau 1535, Montréal (Québec) H3C 5J9
"La Maison de l'OACI", 999 University Street, Suite 1535, Montreal, Quebec H3C 5J9

Téléphone / Telephone : (514) 954-5800
Facsimile / Télécopieur : (514) 954-5809

Notre dossier/Our file E 3/5-08/69

Montréal,
le mardi 2 décembre 2008


S. E. Monsieur Taïeb Chérif
Secrétaire général
Organisation de l'Aviation civile internationale
« La Maison de l'OACI »
Suite 12.15

Réponse intérimaire

Monsieur le Secrétaire général,

La Mission permanente du Canada auprès de l'OACI note le contenu de la lettre d'État E 3/5-08/69 *Projet de position de l'OACI sur les questions intéressant l'aviation qui seront examinées à la Conférence mondiale des radiocommunications de 2011 (CMR-2011) de l'Union internationale des télécommunications (UIT)* et assure Votre Excellence que la lettre a été portée à l'attention des autorités canadiennes pertinentes. Dès que la position canadienne sera connue, elle vous sera transmise dans les plus brefs délais.

Je saisis cette occasion pour vous renouveler, Monsieur le Secrétaire général, l'assurance de ma ~~considération~~ ~~la plus~~ ~~distinguée~~.


Lionel Alain Dupuis

see E 2034
for latest
reply

SENT DIRECT
1610806993

2036

**REPRESENTATION DE LA FRANCE
AUPRES
DE L'ORGANISATION DE L'AVIATION CIVILE INTERNATIONALE**

999, rue Université, Bureau 15.15
Montréal, Québec, Canada H3C 5J9
Téléphone : (514) - 954 - 8269
Télécopie : (514) - 954 - 5752
e-mail : france@icao.int

PL/ **42**

Montréal, le 10 février 2009

Monsieur le Secrétaire Général
de l'Organisation de l'Aviation
Civile Internationale
MONTREAL
B 12.15

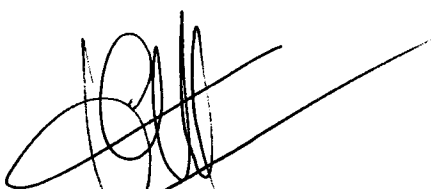
Objet : Réponse à la lettre aux États Réf. E 3/5-08/69 du 28 novembre 2008

Monsieur le Secrétaire Général,

Par lettre citée en objet, vous invitiez la France la France à lui faire parvenir ses observations éventuelles sur le projet de position de l'OACI pour la conférence mondiale des radiocommunications de 2011.

La Représentation permanente de la France a l'honneur de vous informer que la France n'a pas d'observation sur ce projet de position.

Je vous prie de croire, Monsieur le Secrétaire Général, à l'assurance de ma haute considération.



Jean-Christophe CHOUVET
Ambassadeur, Représentant permanent
de la France au Conseil de l'OACI

2037

C. HYDUSIK

CENTRAL REGISTRY:

FILE NO:

E3/5

SENT TO:

CNS/IA2/LS

JOB NO. E08-5245

08 DEC 16 11 05

COPY FOR:

KYRGYZ REPUBLIC

Bishkek, 12 December 2008

Ministry of Transport and Communications

Civil Aviation Authority

Ref. 05-4/1728

Sir,

In response to your letter E 3/5-08/69 dated 28 November 2008 concerning ICAO's position on the agenda items for the International Telecommunication Union's World Radiocommunication Conference 2011, I would like to inform you that the Civil Aviation Authority of the Kyrgyz Republic fully supports ICAO's position and has no comments or proposals.

Sincerely,

SENT DIRECT

1229453SSS

[sgd] B. Dzhunushaliyev
Deputy Director

Secretary General
ICAO
Montreal

ORIGINAL
DEC 16

2038

CENTRAL REGISTRY:

FILE NO:

E3/5

SENT TO:

CNS/IAAS



09 FEB - 5 10 04
**MINISTRY OF FOREIGN AFFAIRS, INTERNATIONAL
CO-OPERATION AND CIVIL AVIATION**
[Department of Civil Aviation]

Phone: (679) 330 9845
Fax : (679) 330 1741

Levels 8 & 9 Suvaou House, Victoria Parade
Department of Civil Aviation
PMB Suva, Fiji Islands

Web site: <http://www.foreignaffairs.gov.fj>
E-mail: alag@min.gov.fj



Our ref : AT.129/13**Date : 5 January 2009**

**The Secretary General
International Civil Aviation Organisation
Montreal
Canada**

Dear Sir,

**Re : DRAFT ICAO POSITION ON ITEMS OF INTEREST TO AVIATION ON
THE AGENDA OF THE INTERNATIONAL TELECOMMUNICATION UNION
(ITU) WORLD RADIOCOMMUNICATION CONFERENCE (2011)(WRC-11)**

The International Civil Aviation Organisation's correspondence on the above subject dated 28 November 2008 is hereby acknowledged.

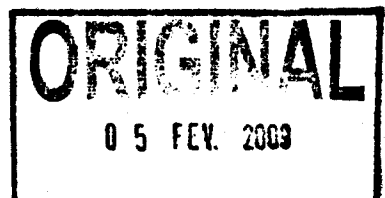
Should we have any comments to make, we will endeavor to submit these to your office accordingly within the timeframe specified.

Yours faithfully,

Alumi Lagicera
For **Permanent Secretary for Foreign Affairs, International
Cooperation & Civil Aviation**

1398/1736

SENT DIRECT



FROM : ICAOFAX

FAX NO. : 8799117

Mar. 06 2009 10:19AM P1

2039



Republic of the Philippines
Department of Transportation and Communications
CIVIL AVIATION AUTHORITY OF THE PHILIPPINES
MIA Road, Pasay City, Metro Manila 1300
www.caap.gov.ph



19 February 2009

MR. TAJEB CHERIF
Secretary General
International Civil Aviation Organization
999 University Street
Montreal, Quebec
Canada H3C 5H7

CENTRAL REGISTRY:
FILE NO: **E 315**
SENT TO: **CNS/AIRS**

Dear Mr. Cherif:

09 MAR -6 08 38

This has reference to your letter dated 28 November 2008 regarding the draft International Civil Aviation Organization (ICAO) position on items of interest to aviation on the agenda of the forthcoming International Telecommunication Union (ITU) World Radiocommunication Conference - 2011 (WRC-11).

We are pleased to inform you that the Civil Aviation Authority of the Philippines (CAAP) fully supports the said position. Further, said position has already been referred to our Regulatory Body, the National Telecommunications Commission (NTC) for their consideration in the preparation of the Philippines' position to WRC - 11.

For your information and reference.

Very truly yours,


RUBEN F. CIRON
Director General



SENT DIRECT

-190165317

2040



Czech Republic
Ministry of Transport

nábřeží Ludvíka Svobody 1222/12
PO BOX 9, 110 15 Praha 1

Prague 26 th February 2009
Ref: 181/2009-220-SP/1

International Civil
Aviation Organization
Mr. Taïb Chérif
Secretary General
999 University Street
Montréal, Quebec
Canada H3C5H7

Dear Sir,

In reply to your letter dated 28 November 2008, Ref. E 3/5-08/69 I would like to inform you that Czech Republic has not any comments on the draft ICAO position for the WRC – 11. Please note, that I have already engaged all responsible bodies to prepare the paperwork for the common position of the Czech Republic at WRC – 11 with the view to support the ICAO position during the WRC – 11.

Accept, Sir, the assurances of my highest consideration

Jaromír Štolc
Director
Civil Aviation Department



CENTRAL REGISTRY:

FILE NO: *E 3/5*
SENT TO: *CNS/AZRS*

2041

M. BRUCE

JOB NO. E09-0792

09 MAR -9 16 01

COPY FOR:

RUSSIAN FEDERATION

Montreal, 27 February 2009

Representation of the Russian Federation to ICAO

Ref. : 56/09

Sir,

In reply to your letter E 3/5-08/69 dated 28 November 2009 [sic] concerning the draft ICAO Position for the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11) relating to items of main concern to aviation, I have the honour to inform you that the Russian Federation on the whole supports the ICAO position.

At the same time the aviation authorities of Russia do not agree to the removal of the Russian Federation from footnote No.5.362B to Agenda Item 1.1 of WRC-11.

Accept, Sir, etc. ...

[sgd] A.A. Novgorodov
Representative of the Russian Federation to ICAO

Secretary General
ICAO
Montreal

2042

CENTRAL REGISTRY:

FILE NO: E3/5

SENT TO: CANS/HAIRS

M. BRUCE

09 MAR -9 16 01

JOB NO E09-0788

COPY FOR:

ARMENIA

27 February 2009

General Department of Civil Aviation

Ref.: 1.1-129

Sir,

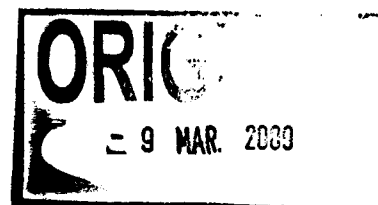
In reply to your letter E 3/5-08/69 dated 28 November 2008 concerning the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-2011), the General Department of Civil Aviation of the Republic of Armenia has no comments to make and fully supports the ICAO Position.

Accept, Sir, etc. ...

[sgd] A. Movsesyan
Head of the General Department

Secretary General
ICAO
Montreal

1236692085
SENT DIRECT





THE UNITED KINGDOM REPRESENTATIVE
on the COUNCIL of the
INTERNATIONAL CIVIL AVIATION ORGANIZATION
Suite 1415
999 University Street
MONTREAL
Quebec CANADA H3C 5J9

Tel: (514) 954 8302
Fax: (514) 954 8001

2043

Our Ref: 27/128

4 March, 2009

To: Secretary General of ICAO

From: The United Kingdom Representative on the Council

Subject: **DRAFT ICAO POSITION ON ITEMS OF INTEREST TO
AVIATION ON THE AGENDA OF THE INTERNATIONAL
TELECOMMUNICATION UNION (ITU) WORLD
RADIOCOMMUNICATION CONFERENCE (2011) (WRC-11)**

Further to your letter of 28 November 2008, reference E 3/5-08/69, the United Kingdom authorities recognizes that ICAO, and the aviation community, will wish to make every effort to secure allocations to aeronautical services in the Radio Regulations, both in quantity and status, their emphasis on safety aspects is understandable. However, we are obliged to consider the overall balance of interests between different users of the spectrum. In the UK, this is a duty of Ofcom and a responsibility of the International Frequency Planning Group, part of the UK Spectrum Strategy Committee structure, within which the UK CAA, Ministry of Defense and NATS are fully involved and represent the UK aeronautical interests.

Please see attachment for more specific comments.

I apologise for the delay in responding.

MICHAEL ROSSELL
United Kingdom Representative

e-mail: mrossell@icao.int

UK COMMENTS ON STATE LETTER E 3/5-08/69

1) PAGE A-3 PARA 2.3

Comment: - Whilst there is no issue with the content, the wording should demonstrate an awareness of the current economic climate.

The second sentence should be amended to read:

"Whilst recognising the current global economic climate, total world airline scheduled passenger traffic in terms of passenger-kilometres has been predicted to grow..."

2) PAGE A-5, AGENDA ITEM 1.1

Proposed Change

The UK believes the text should be modified as shown below:

- d) In the band 1 559 - 1 610 MHz, which is used for elements of the ICAO global navigation satellite system (GNSS), Nos. **5.362B** and **5.362C** allow the operation of the fixed service in some countries on a primary basis until 1 January 2010 and on a secondary basis until 1 January 2015. This band is allocated, on a worldwide, primary basis, to the aeronautical radionavigation service (ARNS) and to the radionavigation-satellite service (RNSS). The band already supports operation of two prime elements of the global navigation satellite system (GNSS), i.e. GLObal NAVigation Satellite System (GLONASS) and global positioning system (GPS), the standards for which have been adopted defined into ICAO SARPs. SARPs for other RNSS systems, such as the European Galileo system, are under development. Studies undertaken in preparation for WRC-2000 indicate that a geographical separation distance exceeding line-of-sight (in the order of 400 km) between aircraft using GNSS and stations of the fixed service is required to ensure safe operation of GNSS. This is a very severe restriction, which can prohibit the safe use of GNSS over wide areas around any fixed service installation. ~~To compensate for these restrictions, retention of current terrestrial radionavigation systems by aviation may be needed, leading to inefficient use of available spectrum. More importantly, Where a fixed service to be introduced into this band then harmful interference situations can~~ould arise leading to disruption to GNSS, affecting the safety of aircraft in flight. Thus, the WRC-2000 agreement to terminate all use by the fixed service in this band in 2015 still constitutes a severe and unacceptable constraint on the safe and effective use of GNSS in some areas of the world. It is, therefore, recommended that deletion of these allocations be effective from 2011.

Rationale for Proposed Change

- The standards for GNSS systems are defined by the relevant design authorities, ICAO have only adopted these standards. Therefore the following change should be made
- The European navigation strategy retains the use of DME-DME navigation as a backup to GNSS. The sentence that starts "To compensate..." would

indicate that terrestrial navigational aids will no longer be required which might be an ideal but cannot be guaranteed yet.

3) PAGE A-8, AGENDA ITEM 1.2 (ICAO POSITION)

Proposed Change

The UK believes the text should be modified as shown below:

Support new provisions or modifications to existing provisions that improve the flexibility with which spectrum allocated to aeronautical safety services can be used by aviation and/or tighten regulatory provisions that enhance the protection of aviation systems.

Ensure that any other measures taken at WRC-11 under Agenda Item 1.2 do not have an adverse impact on the use or protection of aeronautical systems

Rationale for Proposed Change

- Improvement of the wording and strengthen the intent

4) PAGE A-10, AGENDA ITEM 1.3, SENSE AND AVOID

Proposed Change

Modify the text as shown below:-

The safe flight operation of UA necessitates advanced techniques to detect and track nearby aircraft, terrain and obstacles ~~to navigation in order to ensure that theyse unmanned aircraft~~ avoid these objects in a manner equivalent to that achieved by manned aircraft. These advance techniques may require the use of additional radio systems and hence spectrum. The remote pilot will need to be aware of the environment within which the aircraft is operating and be able to identify the potential threats to the continued safe operation of the aircraft and take the relevant action. Given the scarcity of spectrum, care must be taken to ensure that the spectrum requirements identified to meet such applications are kept to a minimum.

Rationale for Proposed Change

- Improvement in the wording.

5) PAGE A-19, AGENDA ITEM 1.12

Proposed Change

Replace the existing text for both the discussion and ICAO Position with the following text:

Discussion:

The frequency band 37-38 GHz is currently allocated on a primary basis to the fixed, mobile, space research (space-to-Earth) and the fixed-satellite (space-to-Earth) services. Aeronautical mobile services that are not excluded from the mobile service allocation have the potential to cause interference to the systems operating in this band. This agenda item, noting that there are currently no aeronautical systems currently or planned to be deployed in the band seeks to ensure that the existing systems operating in the band continue to be able to operate without fear of interference from aeronautical mobile systems.

As previously mentioned aviation currently has no systems currently or planned to be deployed in this band. Aviation therefore can accept any regulatory measure proposed to ensure the protection of other existing services within the frequency band 37-38 GHz from interference from aeronautical mobile services.

ICAO Position:

Not to oppose any regulatory measure introduced to ensure the protection of existing systems operating in the frequency band 37-38 GHz

Rationale for Proposed Change

- There are no current or planned aeronautical systems that operate in the frequency band 37-38 GHz.
- Should a system be designed in the future then the case can be made for an additional allocation. I
- It is pointless and loses credibility to maintain an allocation, especially if it is likely to be severely constrained, when it is common knowledge that there are no systems that will use such an allocation

International Council of Aircraft Owner and Pilot Associations (IAOPA)
Comments on ICAO State letter E 3/5-08/69 Regarding the
Draft ICAO Position on ITU WRC-11 Agenda

The International Council of Aircraft Owner and Pilot Associations (IAOPA) appreciates the opportunity to comment on this important issue. Protection of the electromagnetic spectrum for aviation is essential to the continued viability of civil aviation, but more importantly, access to critical segments of the spectrum is an integral part aviation safety. IAOPA represents the interests of more than 470,000 general aviation and aerial work pilots and owner/operators who are members of our 67 worldwide affiliate organizations.

Traditionally, the spectrum interests of personal transportation and small aircraft segments of general aviation have been relatively elementary, centered on basic voice communications and ground-based radio navigation systems. With the advent of satellite-based CNS and elementary data link our interests have widened to include those useful and safety-linked systems. Yet, our dilemma regarding new technology continues to center on cost vs. effectiveness/efficiency of emerging technology devices. While the full range of modern CNS devices may all contain some marginal benefit for general aviation, the costs associated with those systems are often prohibitive for the small aircraft owner/operator. What may be an ideal system for a large airliner is frequently an economic impossibility for aircraft owner/operators who pays for system upgrades out of their own personal funds.

Therefore, we must take a very selective approach when embracing new or significantly altered devices employing the electromagnetic spectrum. A good example of this is the Global Navigation Satellite System (GNSS). Early GPS receivers were largely unaffordable for general aviation but showed great promise. As receiver and integrated database technology progressed rapidly the devices became more affordable and useful. Significantly, the increased safety and utility aspects of an integrated GPS/database system became a prime driver in the near-universal embrace of GPS by the general aviation community. However, integrated GPS systems certified for IFR enroute and approach purposes are still beyond the reach of many general aviation aircraft owner/operators.

In general we support most of the positions stated in the state letter but must abstain from commenting on those positions that have little apparent applicability for our segment of aviation. With this as a background we would like to submit the following comments regarding the ICAO draft WRC positions:

Agenda Item 1.2 (Resolution 915) – Increase Regulatory Flexibility. This agenda item proposes that regulations and processes be reviewed and changes be proposed to make them more flexible and responsive without specifying what those items might be. While the spectrum demands of emerging technology may make this an attractive proposition, in general changes to spectrum assignments are not in the best interest to general aviation

since they usually mean significant changes to avionics. There are exceptions, e.g. GPS and UAT, but making even positive changes to spectrum usually doesn't require more rapid processes to satisfy the needs of general aviation. Additionally, regulatory flexibility may work against aviation interests if commercial spectrum users use this process to gain an advantage over our requirements. Therefore, the concept of flexibility should not be synonymous with speed of execution or a *laissez faire* approach to protection of the aviation spectrum.

Agenda Item 1.3 (Resolution 421) - Spectrum for Unmanned Aeronautical Systems (UAS). UAS demand for spectrum will like become significant and most likely compete with that of manned aircraft. The allocation of UAS spectrum also has the potential to accelerate the deployment of UAS operations in airspace utilized by general aviation. However, we are faced with the dilemma of not wishing to share the lower airspace structure with UAS but insist that they have adequate sense and avoid and air/ground communications capability to protect our members' safety and utility. Therefore, we advocate allocation to UAS interests based strictly on need. Inherent in these assignments must be guarantees of communications and data link integrity and backups that will ensure the protection of piloted aircraft

Agenda Item 1.5(Resolution 954) – Harmonize spectrum used for news gathering. This item seeks to identify and harmonize spectrum that can be utilized for news gathering. It does not preclude allocation of aeronautical spectrum. We strongly support ICAO's opposition to this proposition.

Agenda Item 1.14 (Resolution 611) – Consider new applications in the range 30-300 MHz range. This agenda item recommends review current allocations in the 30-300 MHz frequency range and the consideration of new radiolocation (non-aeronautical) services in that band. In general, we support this initiative with the caveat that any "creative use" of existing terrestrially-based communications or navigation spectrum be balanced against the continuing need to maintain traditional voice communications and navigation systems for general aviation requirements.

Agenda Item 1.23 - Consider an allocation of about 15 kHz in parts of the band 415 - 526.5 kHz to the amateur service on a secondary basis, taking into account the need to protect existing services. We support the ICAO position with emphasis on ensuring that interference with non-directional beacons (NDB) be a primary consideration in granting amateur access to this spectrum. Aviation must protect this spectrum until last NDB has been decommissioned.

We look forward with interest to the many aspects of the WRC as it will significantly affect worldwide aviation. To this end we are alerting our affiliates to work closely with their State communications and aviation authorities to ensure that aviation interests are adequately protected.

Sincerely,

John Sheehan
IAOPA Secretary General



**DELEGATION OF BRAZIL TO THE
INTERNATIONAL CIVIL AVIATION ORGANIZATION**

Letter No.: 020/ BRASICAO

Montreal, February 20, 2008

Dr. Taïeb Chérif
Secretary General of ICAO
Suite 12.15

Dear Sir,

With respect to State Letter reference E 3/5-08/69, dated 28 November 2008, on Draft Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radiocommunication Conference (2011) (WRC-11), I would like to inform you that my Administration agreed with it.

Please accept, Sir, the assurances of my highest consideration.

A handwritten signature in dark ink, appearing to read "R. Magno", is positioned above the printed name.

RAYMUNDO SANTOS ROCHA MAGNO

Ambassador

Permanent Representative of Brazil to ICAO



CENTRAL REGISTRY: HEAD QUARTERS
 FILE NO: E315 PAKISTAN
 SENT TO: CIVIL AVIATION AUTHORITY
 Jinnah Int'l Airport
 Terminal - I
 Karachi 75200
 Tel: (92-21) 924-2034
 Fax: (92-21) 924-2032
 09 MAR 11 08 18
 COPY FOR:

Ref: HQCAA/1681/13/AT/(IR)

Dated: March 11, 2009

DRAFT ICAO POSITION ON ITEMS OF INTEREST TO AVIATION ON THE
 AGENDA OF THE INTERNATIONAL TELECOMMUNICATION UNION (ITU)
 WORLD RADIOCOMMUNICATION CONFERENCE (2011) (WRC-II)

Dear Sir,

Please refer to your letter No.E 3/5-08/69 dated 28th November 2008, on the subject noted above.

- 2 Enclosed please find item-wise comments as desired.
3. Accept Sir, the assurances of our highest consideration.

Yours sincerely,

M. Alam

SYED MUZAFFAR ALAM
 A/General Manager Air Transport
 (International Regulation)

Encl: As above.

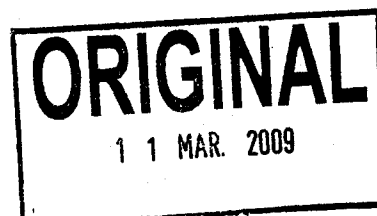
The Secretary General
 International Civil Aviation Organization,
 Montreal Quebec,
CANADA H3C 5H7
 Fax # 001-(514)-954-6077

-1383677998

SENT DIRECT

CC:-

Mr. Muhammad Rauhullah,
 PAREP ICAO,
 Montreal Quebec,
CANADA H3C 5H7
 FAX # 001-(514)954-6417



AGENDA ITEMS 1.1.**COMMENTS**

- a) CAA supports deletion of footnote No.5.72.
- b) CAA supports deletion of footnotes 5.181, 5.197 & 5.259 as access to these bands by the mobile service could create the potential for harmful interference to important radio navigation systems used by aircraft at final approach and landing.
- c) CAA supports deletion of Footnote No.5.330 as access to the band by the fixed and mobile services could potentially cause harmful interference to services use to support aircraft operations.
- d) CAA supports deletion of Footnotes 5.362B & 5.362C as of 2011 in order to remove harmful interference that can be caused by the fixed service to essential aeronautical radio navigation satellite functions in the band 1559-1610 MHz and to permit the full utilization of GNSS services to aircraft on a global basis.
- e) CAA supports deletion of Footnote No.5.439 to protect safety critical operation of radio altimeters in the band 4200-4400 MHz.

AGENDA ITEMS 1.2 to 1.5, 1.7, 1.12, 1.19, 1.21, 1.25 AND ITEM-4.**COMMENTS**

CAA supports ICAO Position.

AGENDA ITEM 1.9**COMMENTS**

CAA supports ICAO position to ensure that introduction by the maritime mobile service of any new modulation techniques, and or changes to the table contained in Appendix 17, does not cause harmful interference to the aeronautical mobile (R) service.

Cont'd...P/2.

-:2:-

AGENDA ITEM 1.14**COMMENTS**

CAA supports ICAO to oppose, under this agenda item, any change to the allocation in the 74.8-75.2 MHz, and/or 108-137 MHz Bands.

AGENDA ITEM 1.15**COMMENTS**

CAA supports ICAO position to ensure that any allocation made as a result of this agenda item does not adversely affect the operation of existing and planned aeronautical systems that operate in or adjacent to the frequency band 3-50 MHz.

AGENDA ITEM 1.22**COMMENTS**

CAA supports ICAO position to oppose operation of short-range devices in any bands allocated to aeronautical services and support the inclusion in Radio Regulations of appropriate regulatory provisions to ensure that short-range devices, operating outside of aeronautical bands, do not cause harmful interference to aeronautical systems operating in allocated aeronautical bands.

AGENDA ITEM 1.23**COMMENTS**

CAA supports ICAO position to ensure that any allocation made to the amateur service can not adversely affect that operation of aeronautical systems operating under allocations to the aeronautical radio navigation service.

CENTRAL REGISTRY:

FILE NO:

AN3/5

SENT TO:

CNS/AIR

09 MAR 11

51

COPY FOR:

TRANSLATION
(Original in Arabic)

KINGDOM OF BAHRAIN
CIVIL AVIATION AFFAIRS

AIR TRANSPORT DIRECTORATE

Ref. No.: AT/IR/ICAO/01/11-006/AN

Date: 8 March 2009

Dr. Taïeb Chérif
Secretary General
International Civil Aviation Organization
Montreal - Canada

Subject: Draft ICAO Position on items of interest to
aviation on the agenda of the International
Telecommunication Union (ITU) World
Radio communication Conference (2011) (WRC-11)

Sir,

With reference to the above-mentioned subject and further to your letter No. E 3/5-08/69 dated 28 November 2008, we would like to inform you that the Civil Aviation Affairs of the Kingdom of Bahrain endorses and supports the Draft ICAO Position on items of interest to aviation on the agenda of the International Telecommunication Union (ITU) World Radio communication Conference (2011) (WRC-11).

Please accept, Sir, the assurances of our highest consideration.

(signed)

Ibtissam Mohamed Alshmlan
Acting Director, Air Transport Directorate

SECRET DIRECT

-1388180937



**KINGDOM OF BAHRAIN
CIVIL AVIATION AFFAIRS**

AIR TRANSPORT DIRECTORATE



مملكة البحرين
شئون الطيران المدني
إدارة النقل الجوي

CENTRAL REGISTRY:

FILE NO:

SENT TO:

الرقم: AT/TR/ICAO/01/11-006/AN

التاريخ: 08 مارس 2009

09 MAR - 9

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08 10
حضرة الفاضل الدكتور/ الطيب شريف المحترم
الأمين العام لمنظمة الطيران المدني الدولي
منظمة الطيران المدني الدولي
مونتريال - كندا

تحية طيبة وبعد ،

الموضوع: مشروع موقف الايكابو بشأن البنود المهمة للطيران في جدول
أعمال المؤتمر العالمي للاتصالات الراديوية لعام 2011 الذي سيعقده
الاتحاد الدولي للاتصالات

بالإشارة إلى الموضوع أعلاه، وعطفاً على كتابكم رقم
E 3/5-08/69 المؤرخ في 28 نوفمبر 2008، نود إفادتكم بأن شئون
الطيران المدني بمملكة البحرين تؤيد وتدعم مشروع موقف الايكابو بشأن
المؤتمر العالمي للاتصالات الراديوية لعام 2011 للاتحاد الدولي
للاتصالات.

وتفضلوا بقبول فائق التحية والاحترام ،،،

ايتسام

ايتسام محمد الشمالان
مدير إدارة النقل الجوي بالوكالة



2009 - 00909/0