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Resolution **956 (WRC-07)**

North American Broadcasters Association (NABA)

COMMENTS ON THE WORKING DOCUMENT TOWARDS DRAFT CPM TEXT ON WRC-12 AGENDA ITEM 1.19

The North American Broadcasters Association (NABA, www.nabanet.com) is an association of broadcasters in Canada, Mexico, and the United States, and the NABA Technical Committee is its standing technical body. NABA is thus in a position to present the technical viewpoints of the most authoritative association of professional North American Broadcasters in television and sound programme production, post-production, and distribution for terrestrial, satellite, and cable broadcasting.

NABA is a Sector Member of ITU-R and a long-time participant in ITU-R Study Groups, Working Parties, Task Groups, Rapporteur groups, etc. NABA numbers among its members Chairmen, Vice-Chairmen and members of the above groups. NABA also participates widely in the ITU work on radio, television and multimedia services and has a strong interest in spectrum management studies including spectrum engineering techniques, spectrum management fundamentals, spectrum monitoring, and inter-service sharing, interference and compatibility. NABA supports the view that sound technical studies and testing are the only practical way to lead to the establishment of effective protection criteria.

In this context, NABA notes the liaison statement from Working Party 6A in Document 1B/162. NABA fully supports the concerns and views expressed by Working Party 6A. In particular, the NABA supports the inclusion of the text proposed by Working Party 6A addressing the concern of the broadcasting service as well as those ITU-R Recommendations relevant to broadcasting.

NABA notes that the broadcasting service is often planned on a noise-limited basis. It may be difficult for Software Defined Radio (SDR) and Cognitive Radio Systems (CRS) technologies to be applied in those frequency bands allocated to the broadcasting service without introducing interference. Consequently, any device using these frequency bands must do so on a non-interference and non-protection basis. NABA also notes that the “Working document towards draft CPM text on WRC-12 Agenda item 1.19” (Annex 5 of Document 1B/158) contains the statement “Some administrations have already authorized the use of unused spectrum in the UHF bands through license-exempt devices which operate on a non-interference and non-protection

basis.” We agree with Working Party 6A that the application of CRS technologies needs to be supported by a solid guarantee, backed by detailed, independently conducted technical studies by recognized research institutions, that such interference would not actually occur. Since the above example does not provide such a guarantee, the statement is inappropriate and does not address the international issue. The statement should be deleted from the CPM text.
