

10 Feb 2014

NARCC/ARRL 420-450 MHz PAVE-PAWS Mitigation Update

Since the initial mitigation process began in 2007 and one-year NARCC moratorium on new 420-450 coordinations began in 2011, and the expiration of the moratorium in 2012, the Board sought an update and guidance from the ARRL on how we should proceed.

The communications with the ARRL is presented here [<link to PavePawsThread.PDF>](#). At this time we are continuing to work with the ARRL on processes and additional contact information to assist all amateurs in establishing and maintaining compliance with the DoD/FCC/ARRL agreement and methods of cooperation.

This has always been and remains a very serious issue for ham radio. It is imperative we all become informed, work together among ourselves and with the ARRL, as well as heed any and all mitigation/enforcement advice from the FCC.

Of note:

- **You** as a licensee are solely responsible for the legal, compliant operation of your transmitter(s). The FCC will contact **you and hold you and only you** responsible. Neither NARCC nor the ARRL can, will or are able to share or protect that responsibility.
- The 420-450 MHz segment is shared on a secondary basis with the U.S. Federal Government having priority. The FCC is the instrument and agent of enforcement for any and all issues of legal or illegal operations, including concerns from the Department of Defense.
- Our presence even as a secondary user has been and is still in jeopardy relative to our cooperation and compliance. Yes, we could still “lose the band”!
- Whatever we think we know from anecdotal accounts and interpretations of technology, government policy or budgets - be it from friends at Raytheon/Lockheed/Loral, the Air Force, DHS, NSA, CIA, etc. that ‘dismiss’ these concerns - are **irrelevant and risky**. Unless or until otherwise decided and published the DoD and FCC have the only and final say – we MUST heed the conditions imposed.
- This applies to all modes of operation - repeaters, link, auxiliary, remote base, simplex, packet, analog, digital, SSB, and **whether or not you are a NARCC member, ARRL member, a repeater is coordinated or uncoordinated**.
- The ARRL has inserted itself on the behalf of all affected amateur radio operators as the liaison with the FCC and DoD. In effect they are our professional technical and **legal resources** in this matter. We should respect their generosity, contribution, assistance and guidance. The agreements and understandings arranged are not formal, or binding. Indeed, they are not authoritative nor acting as enforcement or excuse/substitute for

our license and regulatory obligations. Their interest and efforts are to help protect 420-450 MHz band for all.

- ***There are no guarantees*** – we do not know the tolerance of the DoD in this regard and ***should not attempt to challenge them technically or administratively***. EVERYONE's use of 420-450 is at risk by any or all uncooperative actions - ***we can still "lose the band"***.
- A little recognized portion of Part 97:

47 CFR 97.313 (f) No station may transmit with a ***transmitter power exceeding 50 W PEP*** on the UHF 70 cm band from an area specified in footnote US7 to §2.106 of part 2, unless expressly authorized by the FCC after mutual agreement, on a case-by-case basis, between the ***District Director of the applicable field facility and the military area frequency coordinator at the applicable military base***. An Earth station or telecommand station, however, may transmit on the 435–438 MHz segment with a maximum of 611 W effective radiated power (1 kW equivalent isotropically radiated power) without the authorization otherwise required. The transmitting antenna elevation angle between the lower half-power (–3 dB relative to the peak or antenna bore sight) point and the horizon must always be greater than 10°.

Relevant contact information:

FCC Engineer-in-Charge – San Francisco (tbd)

DoD – forward authorization requests to Dan Henderson, ARRL, dhenderson@arrl.org, 860-594-0200

- The above indicated/affected area: <http://transition.fcc.gov/oet/info/maps/us7/> = f) In the State of California within a 240-kilometer (150 mile) radius around locations at Beale Air Force Base, California (latitude 39°08' North, longitude 121°26' West);
- Note: above defined area may be expanded relative to DoD/FCC experience with determination and mitigation need.