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COMMENTS

BY

ADMINISTRATIONS

ON THE

DRAFT NEW INTERNATIONAL FREQUENCY LIST

(Administrative Council Resolutions Nos. 154 & 200)

BOOKLET A

- I. — INTRODUCTION
- II. — GENERAL COMMENTS



INTERNATIONAL TELECOMMUNICATION UNION
GENEVA, 1951

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COMMENTS BY ADMINISTRATIONS ON
THE DRAFT NEW INTERNATIONAL FREQUENCY LIST

I - INTRODUCTION

Comments submitted by Administrations in accordance with Administrative Council Resolutions 154 (paragraphs 4 and 7) and 200 (paragraphs a and b) have been divided under two general headings :

General comments
Detailed comments.

1. - General Comments

Under this heading, general comments have been classified by countries, and are published in Booklet A. In this booklet, the countries are arranged in the order adopted in Annex 1 to the Convention, their names being preceded by the same numbers as in that Annex. Countries acceding to the Convention have been arranged in the chronological order of their accession, beginning with number 79. At the end are given comments from sources outside the Union.

Under each country, the documents containing the comments of that country are arranged in the chronological order of their receipt. For ease of reference, each document carries a number corresponding to that given to the country in Annex 1 to the Convention, followed by a number representing the chronological order in which the document is placed. Documents submitted pursuant to Resolution 200 bear the indication "A.C Resol. 200" under their reference numbers.

Generally speaking, each document is prefaced by a note indicating the parts of the draft list to which the comments in the document, or annexed to it, refer. For simplicity, the various parts of the draft list have been designated by letters (see Annex I to this Introduction). For easy reference a classification of the documents according to those parts of the list to which they refer, is given in an index (Annex II).

All the comments made by Administrations on requirements submitted between 25 February 1948 and 1 April 1950 (Booklets I to IV inclusive, annexed to circular letter No. 20/73) have been embodied in a copy of these booklets which will be available to the Extraordinary Administrative Radio Conference. The covering letters are not published unless other matters are also discussed.

Additional requirements submitted after 1 April 1950 will be listed and presented to the Conference.

2. - Detailed comments

This section contains the observations of Administrations on specific assignments.

The original documents from Administrations have been arranged in a series of files, each of which refers to a particular service, frequency band or Region. These files will be made available to the Extraordinary Administrative Radio Conference. In addition, individual cards giving full particulars of each detailed comment, have been prepared to facilitate their study by the Conference.

The detailed comments, arranged in the numerical order of frequencies according to the corresponding Service and frequency band, will be despatched to Administrations in the form of booklets (Booklet B et seq.) in which the actual nature of the comments is given in coded form, in order to reduce the volume of material which has to be circulated.

ANNEX I

SYMBOLS REPRESENTING VARIOUS PARTS OF THE DRAFT LIST

Symbol :	Part of the draft list :	Covering circular letter :
A	List for the aeronautical mobile OR service bands	20/20
B	Plan for the aeronautical mobile R service bands	
C	Draft list for the maritime mobile service bands between 4 and 23 Mc/s	20/30
D	Draft list for the band 14 - 150 kc/s	20/45
E	Draft list for the fixed service bands between 4 and 27.5 kc/s (except for K, L, M, N, and O)	20/59
F	List of frequencies to be included in the fixed service bands K, L, M, N and O	20/72
G	High-frequency broadcasting bands	
H	List for Region 1	
I	List for Region 2	
J	List for Region 3	
K	List for the African Region	

ANNEXE II - ANNEX II - ANEXO II

CLASSEMENT DES DOCUMENTS D'APRES LA PARTIE DU PROJET DE LISTE A LAQUELLE ILS SE REFERENT
 CLASSIFICATION OF DOCUMENTS ACCORDING TO THE PART OF THE DRAFT LIST TO WHICH THEY REFER
 CLASIFICACION DE LOS DOCUMENTOS SEGUN LA PARTE DEL PROYECTO DE LISTA A QUE SE REFIEREN

NOTES : (N) = PAS DE COMMENTAIRES OU PAS DE NOUVEAUX COMMENTAIRES (R) = LES COMMENTAIRES SERONT ENVOYÉS À UNE DATE ULTÉRIEURE
 NOTES : (N) = NO COMMENTS OR NO NEW COMMENTS (R) = COMMENTS WILL BE SENT LATER
 NOTAS : (N) = SIN COMENTARIOS O SIN COMENTARIOS NUEVOS (R) = LOS COMENTARIOS SERÁN ENVIADOS ULTERIORMENTE

MEMBRES DE L'UNION MEMBERS OF THE UNION MIEMBROS DE LA UNIÓN		PARTIE DU PROJET DE LISTE (VOIR ANNEXE I) PART OF THE DRAFT LIST (SEE ANNEX I) PARTE DEL PROYECTO DE LISTA (VÉASE ANEXO I)												
		ENSEMBLE WHOLE LIST CONJUNTO	A	B	C	D	E	F	G	H	I	J	K	DIVERS MISC. DIVERSOS
AFGHANISTAN	1													
ALBANIE (RÉP. POP. D')	2	2.1												
ARABIE SAÛDITE (ROY. DE L')	3		3.1											
ARGENTINE (RÉP.)	4		4.2 4.3	4.2 4.3	4.2 4.3	4.2 4.3					4.2 4.3			4.1(R)
AUSTRALIE (FÉD. DE L')	5	5.2	5.3	5.3	5.3		5.1 5.3	5.3				5.1 5.3		
AUTRICHE	6													
BELGIQUE	7	7.2	7.1		7.1	7.1	7.1	7.1						
BIÉLORUSSIE (RÉP. S. S. DE)	8	8.3 8.4	8.1		8.2	8.3	8.3							
BIRMANIE	9				9.1									9.2(N)
BOLIVIE	10													
BRÉSIL	11													
BULGARIE (RÉP. POP. DE)	12	12.3 12.4	12.1		12.2	12.3	12.3							
CANADA	13		13.1 13.3	13.3	13.1		13.1	13.1			13.3			13.2
CHILI	14													14.1(R)
CHINE	15		15.1					15.1						

MEMBRES DE L'UNION MEMBERS OF THE UNION MIEMBROS DE LA UNIÓN		PARTIE DU PROJET DE LISTE (VOIR ANNEXE I) PART OF THE DRAFT LIST (SEE ANNEX I) PARTE DEL PROYECTO DE LISTA (VÉASE ANEXO I)												DIVERS MISC. DIVERSOS
		ENSEMBLE WHOLE LIST CONJUNTO	A	B	C	D	E	F	G	H	I	J	K	
CITÉ DU VATICAN (ÉTAT DE LA)	16	16.1					16.2	16.2						VOIR 66 SEE 66 VÉASE 66
COLOMBIE (RÉP. DE)	17													
COLONIES PORTUGAISES	18				18.2		18.1 18.3	18.1 18.2		18.3		18.3		
COLONIES, ETC. ROYAUME-UNI	19													
TERRITOIRES, ETC. FRANCE	20		20.3	20.3	20.3	20.3	20.1 20.3	20.3		20.3	20.3	20.2 20.3		
CONGO BELGE, ETC.	21				21.4	21.1	21.2 21.5	21.3						
COSTA-RICA	22													
CUBA	23		23.1	23.1	23.1		23.1	23.1		23.1	23.1	23.1		
DANEMARK	24		24.2		24.1	24.1	24.1	24.1					24.3(N)	
DOMINICAINE (RÉP.)	25													
EGYPTE	26		26.1		26.1		26.1	26.1					26.2	
EL SALVADOR	27												27.1	
EQUATEUR	28													
ÉTATS-UNIS D'AMÉRIQUE	29		29.1	29.1	29.1	29.1	29.1	29.1	29.1	29.1	29.1	29.1		
ETHIOPIE	30	30.1												
FINLANDE	31	31.6			31.4 31.5	31.1	31.2	31.3		31.6				
FRANCE	32		32.4	32.4	32.1 32.4	32.1 32.4	32.3 32.4	32.3 32.4		32.2 32.4	32.4			
GRÈCE	33		33.2	33.2	33.1 33.2	33.1 33.2	33.1 33.2	33.1 33.2						
GUATÉMALA	34	34.2 34.3 34.4 34.5	34.1 34.3				34.4						34.6(N) 34.7 (RES. 200 & 206)	

MEMBRES DE L'UNION MEMBERS OF THE UNION MIEMBROS DE LA UNIÓN		PARTIE DU PROJET DE LISTE (VOIR ANNEXE I) PART OF THE DRAFT LIST (SEE ANNEX I) PARTE DEL PROYECTO DE LISTA (VÉASE ANEXO I)												
		ENSEMBLE WHOLE LIST CONJUNTO	A	B	C	D	E	F	G	H	I	J	K	DIVERS MISC. DIVERSOS
HAÏTI (RÉP. D ¹)	35					35.1	35.1 35.4	35.1 35.4			35.4			35.2 35.3(N)
HONDURAS (RÉP. DE)	36													
HONGRIE (RÉP. POP. DE)	37	37.1 37.2				37.1	37.1							
INDE	38		38.2 38.3	38.2 38.3	38.1 38.3	38.1	38.1 38.3	38.1 38.3	38.2			38.2 38.3		
INDONÉSIE (RÉP. B ¹)	39		39.1	39.1	39.1		39.1	39.1				39.1		39.2(N)
IRAN	40													
IRAK	41	41.2					41.3	41.1 41.3						
IRLANDE	42		42.2	42.2	42.2	42.2	42.1 42.2	42.1 42.2		42.1 42.2				
ISLANDE	43					43.1	43.1	43.1		43.1				
ITALIE	44				44.1 44.2	44.1	44.1 44.2	44.1 44.2		44.2				
LIBAN	45						45.1							45.2(N)
LIBÉRIA	46													
LUXEMBOURG	47													
MEXIQUE	48													
MONACO	49													
NICARAGUA	50													50.1 (N)
NORVÈGE	51		51.4	51.4	51.3	51.4	51.5	51.5		51.6				51.1(R) 51.2(R)
NOUVELLE-ZÉLANDE	52		52.3 52.6	52.4 52.6	52.1 52.2 52.6	52.6	52.5 52.6	52.5 52.6	52.6			52.6		
PAKISTAN	53	53.6	53.1		53.4	53.2	53.3 53.6	53.3				53.5 53.6		

MEMBRES DE L'UNION MEMBERS OF THE UNION MIEMBROS DE LA UNIÓN		PARTIE DU PROJET DE LISTE (VOIR ANNEXE I) PART OF THE DRAFT LIST (SEE ANNEX I) PARTE DEL PROYECTO DE LISTA (VÉASE ANEXO I)												
		ENSEMBLE WHOLE LIST CONJUNTO	A	B	C	D	E	F	G	H	I	J	K	DIVERS MISC. DIVERSOS
PANAMA	54													
PARAGUAY	55						55.1	55.2						
PAYS-BAS, SURINAM, ETC.	56	56.1			56.2		56.1 56.2	56.2						
PÉROU	57													
PHILIPPINES (RÉP. DES)	58													58.1(R)
POLOGNE (RÉP. DE)	59	59.1 59.2				59.1	59.1							
PORTUGAL	60		60.2	60.2	60.2		60.1 60.2	60.1 60.2	60.2	60.1 60.2				
MAROC ET TUNISIE (PROT. FRAN.)	61		61.3	61.3	61.2 61.3	61.3	61.1 61.3 61.5	61.3		61.1 61.3	61.3			61.4
YUGOSLAVIE (RÉP. P. F. DE)	62		62.3	62.3	62.1 62.3	62.3	62.1 62.3	62.3		62.3				62.2
UKRAINE (RÉP.S.S. D ¹)	63	63.3 63.4	63.1		63.2	63.3	63.3							
RHODÉSIE DU SUD	64	64.2					64.1	64.1		64.1				
ROUMANIE (RÉP. POP.)	65	65.1 65.2				65.1	65.1							
ROYAUME-UNI, ETC.	66		66.1 66.2		66.1	66.1 66.2		66.1		66.1	66.1	66.1	66.1	
THAÏLANDE	67													
SUÈDE	68		68.1	68.1	68.1	68.1	68.1	68.1		68.1				68.2(N)
SUISSE (CONFÉD.)	69		69.2 69.3	69.3	69.3		69.1 69.3			69.3				69.3
SYRIENNE (RÉP.)	70													
TCHÉCOSLOVAQUIE	71	71.1 71.2				71.1	71.1							
TERRITOIRES DES ETATS-UNIS	72													VOIR SEE VÉASE
TURQUIE	73						73.1							2

MEMBRES DE L'UNION MEMBERS OF THE UNION MIEMBROS DE LA UNIÓN		PARTIE DU PROJET DE LISTE (VOIR ANNEXE I) PART OF THE DRAFT LIST (SEE ANNEX I) PARTE DEL PROYECTO DE LISTA (VÉASE ANEXO I)												
		ENSEMBLE WHOLE LIST CONJUNTO	A	B	C	D	E	F	G	H	I	J	K	DIVERS. MISC. DIVERSOS
UNION DE L'AFRIQUE DU SUD, ETC.	74	74.3			74.2	74.2	74.2	74.2		74.2			74.2	74.1(R)
UNION DES RÉPUBLIQUES SOCIALISTES SOVIÉTIQUES	75	75.3 75.4	75.1		75.2	75.3	75.3							
URUGUAY (RÉP. OR. DE L')	76		76.1		76.4		76.2 76.3	76.3						
VÉNÉZUÉLA (ÉTATS-UNIS DE)	77				77.4		77.1 77.4	77.4						77.2(R) 77.3(R)
YÉMEN	78													
JAPON	79				79.1		79.1	79.2				79.3		
ISRAËL (ÉTAT D')	80													
CEYLAN	81						81.1					81.1 81.2		81.3

SOURCES EXTÉRIEURES À L'UNION SOURCES OUTSIDE THE UNION FUENTES AJENAS A LA UNIÓN														
ALLEMAGNE (ZONE BRIT.)	83						83							

II - GENERAL COMMENTS

(2)

People's Republic of Albania

Nº 2 .1
C.A. Res. 200

15th February, 1951
(published in Notification Nº 618)

Comments on : the whole of the draft list

With reference to your circular letter 9.6/764, of 14th October 1950, and to your telegram 157/18, of 18 November 1950, we have the honour to inform you that the present situation as regards frequencies, created by the draft plans prepared by the Provisional Frequency Board (P.F.B.), the International Administrative Aeronautical Radio Conference and the Administrative Radio Conference for Region 1 can only be solved by the Ordinary Administrative Conference, which is alone competent to make changes in the Radio Regulations and to lay new foundations for the preparation of an equitable list acceptable to all Members of the Union. Stop Adoption of the draft plans produced, and any decision contrary to the principles of the Atlantic City Conference, and in the interests of the United States of America, the United Kingdom and France would have effects on the aeronautical, broadcasting, radiotelegraph, radiotelephone services, etc. Stop

Kindly bring the above to the notice of all Members of the Union by publishing it in a forthcoming General Secretariat Notification +

(3)

SAUDI ARABIA

No 3.1

21 June, 1950.

Comments on: A

Referring to your circular letter N° 20/20 dated 10 th February 1950, I beg to inform you that Aeronautical Mobile Frequencies of Saudi Arabia Kingdom are 7920 and 6510 kc/s.

Frequencies of service are 7920, 6510 kc/s, 12812 and 13120 Mc/s.

(4)

ARGENTINE

(REPUBLIC)

Nº 4.1

30 May, 1950

Due to delay in reception of the later portions of the P.F.B.'s work the Argentine Administration regrets to inform you that it will be unable to send its comments with regard to the draft plan within the time limits laid down in Administrative Council Resolution Nº 154. Stop It will nevertheless do so at the earliest possible date+

(4) - 2 -

No 4.2
C.A. Res. 200

Received March 13th, 1951

Comments on : A, B, C, D, I

Reference Resolution 200 CA/5 Stop Comments of the Argentine Administration regarding plans for the Aeronautical Mobile Service R and OR (route and off route) : acceptable without modifications Stop Plans for Maritime Mobile Service radiotelegraph and radiotelephone coast stations are acceptable, subject to modifications which would not alter the general structure of the plans Stop Regarding regional allocations in bands below 4 000 kc/s, the coordination of the lists has not yet been completed Stop Regarding band 14-150 kc/s : this is acceptable without modifications Stop Regarding remaining P.F.B. plans, we abstain from formulating comments for the time being Stop We shall send you by air mail notes and individual comments +

No. 4.3
C.A. Res. 200

March 12th 1951

Comments on : A, B, C, D, I

In accordance with Administrative Council Resolution No. 200/CA5, I have the honour to send you herewith the comments my Administration has to make on the plans which, with a view to producing a new international frequency list, various Union conferences and meetings have drawn up.

As regards the plans for the aeronautical mobile R and OR services, this Administration is prepared to accept them as they stand.

As regards the plans for radiotelegraph and radiotelephone coast stations, the Argentine Administration is prepared to accept them, subject to the amendments suggested in the specific comments enclosed. The changes we propose in no wise alter the general structure of the plans and we are of the opinion that they are reasonable and thoroughly well-founded. It will suffice to point out - and this is brought out in the specific comments - that the steady increase in our mercantile marine, both as regards deep-sea and coastal vessels, has led to a development of the maritime mobile radio services, with a parallel expansion of Argentine marine services (a fact well-known internationally). The changes in power of the equipment in use (notified in the list of requirements submitted at Atlantic City, 1947) are a consequence of this.

As regards those parts of the spectrum below 4,000 kc/s regionally allotted, our Administration is making every effort to coordinate national lists, as decided upon at the Region 2 Conference in Washington, 1949. We believe that this work will be finished in good time for the Extraordinary Administrative Radio Conference.

Except as regards the 14-150 kc/s band, which we find acceptable as it stands (the problem is quite separate from that which arises for bands above 4 Mc/s), the Argentine Administration is unable, at present, to make any comments on the plans prepared by the Provisional Frequency Board.

(4) - 3 -

The Maritime Mobile Service :Comments on the plans evolved for radiotelegraph and radiotelephone coast stations :I - General comments

The steady increase in our merchant fleet, both deep-sea and coastal, involves an expansion of maritime mobile radio services and a parallel development of marine services. Hence our Administration has been obliged to make some changes in the power used by equipment in service, as notified in the list of requirements submitted at Atlantic City in 1947.

Acceptance of the plans for radiotelegraph and radiotelephone coast stations is therefore subject to adoption of the amendments proposed.

As regards the changes corresponding to circuits A0 91 (1), (2), etc., of the radiotelegraph plan, these refer to the requirements submitted at Atlantic City with powers of 1.5 kW. In a few cases these were mistakenly taken to be 0.1 kW.

All the changes mentioned above, together with those previously indicated, in no way affect the general structure of the plan and are considered to be reasonable and thoroughly well-founded.

II - Detailed comments
.....

Note : The detailed comments annexed to the previous letter have been classified in a file concerning the maritime mobile service. This file is at the disposal of the Extraordinary Administrative Conference.

(5)

AUSTRALIA

(Commonwealth of)

No 5.1

11th July, 1950

Comments on : E and J

With reference to the Resolution No 154 of the Administrative Council, which called for observations and proposals on the various frequency lists prepared by the P.F.B., regional and service conferences, the Australian observations are forwarded herewith.

The detailed observations refer only to the frequency lists prepared by the P.F.B., and no comments are offered concerning either the lists prepared by the Aeronautical Radio Conference or the Maritime Mobile Section of the P.F.B. list.

In connection with the list prepared by the Region 3 Administrative Radio Conference, the Australian Administration will have certain proposals to offer for alterations and additions to the list, and these will be presented directly to the Conference at The Hague.

Note : The detailed remarks and comments attached to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Radio Conference.

No 5,2 (received 23.10.50)

13th October, 1950

Comments on : the whole of the draft list

Adverting to my communication of 11th July, 1950, relating to the above subject, it is now desired to submit the attached list containing additional observations from this Administration on the various frequency lists prepared by the Provisional Frequency Board, regional and Service Conferences. The attachment also contains certain amendments to the comments already submitted.

It will be recalled that, as intimated in my letter of 11/7/1950, no Australian comments were submitted in relation to the list prepared by the Region 3 Administrative Radio Conference, it being intended to present these directly to the Hague Conference.

(5) - 2 -

Alteration of intentions in this regard has become necessary as a result of postponement of the Hague Conference and the work of completing Australia's Comments concerning assignments in the Region 3 Draft Frequency list is now proceeding. It is anticipated that finality in this connection will be reached at an early date and the relevant data will then be forwarded.

Note : The detailed remarks and comments attached to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Radio Conference.

(5) - 3 -

No. 5.3
C.A. Res. 200

8th December, 1950.

Comments on: A, B, C, E, F and J.

In accordance with the invitation contained in Annex 15 to your letter 9.6/764 dated 14th October, 1950, I have the honor to submit herewith the details requested under sub-paragraphs a) and b) thereof.

It will be recalled that in my letters of 11th July and 13th October, 1950 *, it was indicated that no Australian comments were being submitted in regard to the draft frequency list prepared by the Region 3 Conference, it being intended to present these directly to the Extraordinary Administrative Radio Conference scheduled to commence at The Hague in September last. The delay in submission was occasioned by the desire to discuss certain aspects of this draft list with representatives of the New Zealand Administration before submitting comments for consideration by the Extraordinary Conference.

The discussions mentioned have now taken place and, as a result, it is understood that the New Zealand Administration will desire considerable amendments to the list which will, however, have little or no effect on services operated by any other Administration than Australia.

Australian comments in connection with the Region 3 list are contained in Appendix 1, attached, but it is desired to emphasise that the comments relative to frequencies contained in bands other than that reserved for medium frequency broadcasting, 535 - 1 605 kc/s, may be subject to alteration at a later date in the light of negotiations with New Zealand.

Australia has no detailed comments to offer in connection with the draft frequency plans relating to the Maritime Mobile and Aeronautical Mobile Services. Both plans are acceptable for implementation provided Australian Services are not involved in any major modifications.

Individual comments in connection with P.F.B. bands between 3 900 and 27 500 kc/s have already been submitted but it is desired please to add the following thereto:

- a) Circuit No. AT 22 (Fiskville - Perth) - The frequency spacing between 10 906 kc/s and 18 651 kc/s for the complement allotted to this service is considered to be too great for satisfactory operation.
- b) Circuit No. HT 37 (Samarai - Port Moresby) - Transfer of this circuit to the band 9 040 - 9 500 kc/s is desired in lieu of the band 7 300 - 8 195 kc/s allotted.
- c) Circuit No. AT 77 (Townsville - Darwin) - Transfer desired to band 6 765 - 7 000 kc/s in lieu of the band 7 300 - 8 195 kc/s allotted.

* Published under Nos. 5.1 and 5.2 respectively.

(5) - 4 -

The following general comments are offered in relation to the invitation contained in sub-paragraph b) of Annex 15:

D Band)	
E ")	
F ")	
G ")	
H ")	
I ")	
J ")	Although certain unsatisfactory features are noted, and these have already been notified to the I.T.U., it is considered that the plans could be reasonably adjusted to suit requirements without major changes.
K Band)	
L ")	
M ")	
N ")	No plans produced.
O ")	
P ")	
Q Band)	
R ")	Unfortunately the plans for these bands can only be made acceptable with major modifications. They are unacceptable for introduction in their present form.
S Band)	
U ")	Acceptable for implementation without major modifications.
V ")	
T Band	(Although plans were not completed because of insufficient time, it is considered that if approach is made along the lines adopted for bands S, U and V an acceptable plan could be produced.
W Band)	
X ")	
Y ")	Insofar as Australian circuits are concerned, it is considered that acceptable plans could be produced without major modifications to the work already done.
Z ")	
aa Band)	
bb ")	
cc ")	
dd ")	With minor modifications the plans developed would be acceptable for implementation.
ee ")	
ff ")	

Action is in train to provide the Bureau with the information sought in sub-paragraphs c) and d) before the target date of 31st January, 1951, and the monitoring information sought under sub-paragraph e) will be forwarded each month as desired.

Note: The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

(7)

BELGIUM

N° 7.1

31 May, 1950

Comments on : A, C, D, E and F.

I have the honour to enclose herewith a set of cards containing the Belgian Administration's observations on the frequencies allotted to it in the P.F.B. draft list.

To supplement these observations, I produce below a communication sent to me by the Belgian Régie des Voies Aériennes (RVA), which may be of interest to you :

"I would draw your attention to the present requirements of the Belgian aeronautical fixed service which, according to the final I.C.A.O. plan, are as follows :

1. Circuit Brussels-Leopoldville : Duplex frequency-shift radio telex ;
2. Reserve network - one frequency in each of the 4, 6, 8, 11 and 17 Mc/s bands - All radiotelegraphy-allocation on a world basis.

The RVA reserves the right, during the intermediary period preceding the application of the final plan, and subject to the agreement of the administrations concerned, to participate in the groups of the aeronautical fixed network, to which Brussels should be linked for the routing of traffic, within the time limits recommended by I.C.A.O."

Note : The detailed remarks and comments contained in the cards annexed to the preceding letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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No 7.2
C.A. Res. 200

8 December, 1950

Comments on : the whole of the draft list

In response to the I.T.U. Administrative Council's invitation, I have the honour to submit herewith, in accordance with my telegram of 27 November last, the comments the Belgian Administration has to make on the frequency assignment plans prepared :

I - Frequency bands below 4 000 kc/s

The various plans prepared may be adopted as they stand, i.e., on condition that the Copenhagen Broadcasting Plan should not be questioned, and subject to the general remarks made in paragraph a) below, applicable to all frequencies of the aeronautical mobile R service.

II - Frequency assignment plans for the aeronautical mobile service

- a) Aeronautical mobile R service
The plan R produced by the Geneva Conference is acceptable as a general allocation plan for "air route areas". Nevertheless, it would be desirable for the Extraordinary Administrative Radio Conference to make no individual assignments to stations, but to let I.C.A.O. do so within the framework of that general plan, as and when aeronautical requirements arise.
- b) Aeronautical mobile OR service
The OR plan produced by the Geneva Conference is acceptable.
- c) Aeronautical fixed service
This frequency list would be acceptable if an extra frequency at about 7.5 Mc/s were made available to us for the day liaison Brussels-Prague-Zurich. Further, Belgium wishes to obtain the joint frequencies of the aeronautical fixed service, requested by I.C.A.O.

III- Assignment plans for the maritime mobile service

- a) Radiotelegraph coast stations
The list is generally acceptable.
- b) Radiotelephone coast stations
According to the plan, Belgium is to be offered only frequencies shared with neighbouring countries and with neighbouring stations of vastly superior power. We accept it only if agreement can be reached with these countries on equitable time sharing.

IV - Band E (3 950 - 4 000 kc/s)

Since the plan submitted takes no account of broadcasting requirements, we cannot define our attitude.

V - Assignment plans for frequencies between 4 000 and 27 500 kc/s

- a) Broadcasting service
Since the broadcasting conferences reached no agreement, we can make no comment.

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b) Fixed service

Our fixed service requirements would not be covered if the assignment plans for these frequencies were to be applied in their present form. We consider that these plans as a whole are not acceptable, and could not serve as a basis for preparation of the new list.

(8)

BIELORUSSIAN SOVIET SOCIALIST REPUBLIC

N° 8.1

22 May, 1950

Comments on : A

I have the honour to inform you that the views held by the Telecommunication Administration of the Bielorussian Soviet Socialist Republic with regard to the question raised in your circular letter N° 20/20 of 10 February 1950 were expounded by our Delegation at the 30th Plenary Meeting of the Aeronautical Conference, Document Aer/2 N° 162, and that our views have not changed +

N° 8.2

22 May, 1950

Comments on : C

I have the honour to inform you that the views of the Telecommunication Administration of the Bielorussian Soviet Socialist Republic on the matter discussed in your circular letter N° 20/30 of 2 March 1950 were explained by our delegation at the 32nd and 34th Plenary Meetings of the P.F.B., and that these views remain the same +

N° 8.3

19 June, 1950

Comments on : D, E, and the whole of the draft list.

In reply to your circular letters 20/45, 20/59 and telegram 92/2, the Delegation of the USSR to the Provisional Frequency Board repeatedly declared that the Board was wrong in adopting the principles and methods it did adopt. It likewise indicated that it would not accept the list so prepared, the attitude of the Communications Administrations of the USSR, the Ukrainian and Bielorussian Soviet Socialist Republics to the list which has been prepared remains unchanged, as to the plans prepared by Regional and Special Conferences, our attitude has been explained at sufficient length in the statements made by the Soviet Delegations at those Conferences +

(8) - 2 -

Nº 8.4
C.A. Res. 200

17th January, 1951
(published in Notification Nº 617)

Comments on : the whole of the draft list

Further to your circular letter Nº 9.6/764 of 14th October 1950, and your telegram Nº 157/18 of 18th November 1950, the Administration of the Bielorussian Soviet Socialist Republic has the honour to bring the following to your notice :

In the Provisional Frequency Board, and in the Administrative Radio Conference for Region 1, as well as in the International Administrative Aeronautical Radio Conference, our delegation, wishing to develop and reinforce international collaboration in the field of radio, repeatedly pointed out that the conferences whose task it was to evolve draft frequency lists had adopted as a basis for their work methods which had no scientific foundation and principles lacking in objectivity, and that, such being the case, an international frequency list meeting the requirements of all I.T.U. Members-States would never be produced. Stop Our delegation proposed that the Berne list of 1939 should be used for the preparation of the new list, on the grounds that, reflecting the actual needs and frequency requirements of countries, and having been tried and tested by many years of operational experience, they would provide a just and equitable basis for the new list. Stop

Our delegation drew the attention of Members of the Union to the fact that work on the new list was proceeding in a way which was in no sense conducive to international collaboration, and that the aim was to redistribute frequencies in the interests of the United States of America, Great Britain and France. Stop That this was in fact so is borne out by an analysis of the draft plans submitted. Stop

1. Thus, according to the plan prepared by the Provisional Frequency Board, 39% of all frequencies to be apportioned are to go to three countries : the United States of America, Great Britain and France, whereas the rest of the world is allotted a mere 61%. Stop According to this draft 17.2 % of all frequencies are to go to the United States of America, 10.8 % to Great Britain and 11% to France. Stop The Soviet Union receives 4.1 %, China 4.9% and India 3.7 % - figures which in no way correspond to the actual requirements of these countries, the size of their populations and the extent of their territories. Stop In relation to the Berne Lists, the number of frequencies to go to the United States of America, Great Britain and France, according to the P.F.B.'s draft, has increased, while those accorded to the Union of the Soviet Socialist Republics, China and other countries have been considerably cut down. Stop

2. The draft plan prepared by the International Administrative Aeronautical Radio Conference makes no allowance for the interests of I.T.U. Members-States. Stop According to this draft, half of all the frequencies of the R service (air navigation along regular air routes) have been accorded to the so-called Major World Air Routes, monopolized by the United States of America, while the interests of the aeronautical services operated by other Members-States are completely overlooked. Stop

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3. The draft plan which was adopted by a slender majority of the countries represented at the Administrative Radio Conference for Region 1 constitutes an open breach of the Atlantic City Radio Regulations and Resolutions. Stop It does not reflect the interests of Region 1 countries, and confirms the allocation of frequencies in the 1 900 to 2 000 kc/s band to Loran stations set up by the United States of America - stations which cause grave interference to fixed and mobile stations of Region 1 countries. Stop Many other examples might be adduced, but the above will be sufficient to show that the plans produced for incorporation in the International Frequency List do not cater for the interests of all Members of the Union, and cannot possibly be accepted as a basis for discussion, or even as working material, for the Extraordinary Administrative Radio Conference. Stop The task of putting the final touches to these draft lists, incumbent on the International Frequency Registration Board, therefore becomes pointless, so that the conditions necessary for that body to perform the tasks entrusted to it by Article 6 of the Convention do not at present exist. Stop The only way out of the situation thus created is to refer the matter to the next Administrative Radio Conference, this being the only authority competent to solve the problems arising out of changes to be made in the Regulations, and to lay the foundations for a list acceptable to all Members of the Union. Stop At the same time, we feel obliged to draw the attention of all administrations to the fact that adoption of a draft list unsatisfactory for the aeronautical, broadcasting, radiotelegraph, radiotelephone, emergency and other services would be a breach of the principles enshrined in the Atlantic City Convention and might have the gravest consequences. Stop

As has always been our practice in the past, we shall continue to respect the interests of all Members of the I.T.U., and to collaborate with all countries which sincerely desire the production of a new international Frequency List satisfactory for all countries. Stop

We should be grateful if you would kindly bring this to the notice of all Members of the Union by publishing it in the next notification to be issued by the General Secretariat +

(9)

BURMA

No 9.1

13th May, 1950

Comments on : C

It is observed that Burma's requirements as notified under my letter No ENG/X-18 of 25-11-49 have not been registered, instead only two other frequency allotments in the 6 Mc/s and 12 Mc/s bands have been shown as notified. This is incorrect.

I have the honour to state that Burma's only coast station Rangoon Radio XYR has been in post war operation since January 1946 and is actually using, and proposed to continue using the frequencies notified viz 4200 kc/s, 8400 kc/s, 12600 kc/s and 16800 kc/s. Since it is essential that we have four harmonically related frequencies, one in each band. Alternative harmonically related frequencies, one in each band if allotted by you will be acceptable, but failing such allotment I must reserve the right for Burma to operate her Coast Stations on the frequencies notified.

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Nº 9,2
C.A. Res. 200

Received 20 December, 1950

Reference your circular telegram Nº 157/18 dated 21st November
1950 Stop No comments +

(12)

BULGARIA (People's Republic of)

N° 12.1

23rd May, 1950

Comments on : A

Reference circular letter N° 20/20 Stop With reference to question dealt with in that letter, I have the honour to inform you that the Administration of the Posts, Telephones and Telegraphs of the People's Republic of Bulgaria fully supports views expressed by the Soviet Delegation at the 30th Plenary Meeting of the International Administrative Aeronautical Radio Conference, Document Aer/2 N° 162 +

N° 12.2

23rd May, 1950

Comments on : C

Reference circular letter N° 20/30 Stop With reference to question dealt with in that letter, I have the honour to inform you that the Administration of the Posts, Telephones and Telegraphs of the People's Republic of Bulgaria entirely supports the opinion expressed by the Soviet Delegation at the 32nd and 34th Plenary Meetings of the P.F.B. +

N° 12.3

24th June, 1950

Comments on : D, E, and the whole of the draft list

Reference circulars N°s 20/45, 20/59 and telegram N° 92/2 Stop Administration of People's Republic of Bulgaria retains unchanged its attitude expressed by its National Member concerning erroneous so-called technical methods and principles used as basis of work, together with the unacceptable nature of the partial drafts of the international frequency list being prepared by the P.F.B. Stop The attitude of the Bulgarian Administration towards the draft frequency lists prepared by the Conference for Region 1 and other conferences held under the aegis of the I.T.U. also remains unchanged and appears in the statements recorded by our respective delegations +

(12) - 2 -

Nº 12.4
C.A. Res. 200

12 January, 1951
(published in Notification Nº 617)

Comments on : the whole of the draft list

With reference to your circular letter Nº 9.6/764 of 14 October 1950 relative to the Extraordinary Administrative Radio Conference, to circular telegram Nº 157/18 of 18 November 1950 and to Administrative Council Resolution Nº 200, the Administration of the People's Republic of Bulgaria asks you to bring the following statement to the notice of I.T.U. Member-States

Stop

The Bulgarian Administration, represented by a delegation in the P.F.B., the Administrative Radio Conference for Region 1 and the International Administrative Aeronautical Radio Conference, pointed out that the working methods adopted for the preparation of the draft frequency plans were not conducive to the elaboration of a frequency list safeguarding the interests, and meeting the frequency requirements, of I.T.U. Member-States

Stop Those methods lacked objectivity since they overlooked the actual frequency requirements of all Members of the Union

Stop Wishing to ensure the closest international collaboration in the field of radiocommunications, we maintained that the Berne list of 1939 would constitute a solid basis for the preparation of the new frequency list, on the grounds that it made allowance for actual requirements and had been tried and tested by years of practical experience

Stop The same cannot be said of the frequency plans hitherto evolved

Stop Thus, in the draft plans prepared by the P.F.B., 39% of all frequencies are assigned to the United States of America, Great Britain and France, whereas no more than 61% are assigned to the rest of the world

Stop This shows that these three countries derive very substantial benefits from the draft, to the detriment of all other countries; a conclusion which receives confirmation from the fact that 17.2 % of all frequencies are assigned to the United States of America, while no more than 4.9 % are assigned to China and 4.1 % to the Union of Soviet Socialist Republics

Stop Quite obviously, no account has been taken of the fact that such figures bear no relation to the actual frequency requirements of countries other than the United States of America, Great Britain and France, to the size of their populations and the extent of their territories

Stop

According to the draft plan prepared by the International Administrative Aeronautical Radio Conference, half the aeronautical service frequencies are allotted to the so-called Major World Air Routes dependent on the United States of America

Stop This again is detrimental to the interests of other I.T.U. Member-States

Stop

The draft plan adopted by a slight majority at the Region 1 Conference is also designed to serve the interests of the United States of America

Stop It constitutes a breach of the Atlantic City Radio Regulations and Resolutions, and, in so far as it allocates frequencies in the 1 900 - 2 000 kc/s band to the Loran system, causes interference to stations of the fixed and mobile services in Region 1

Stop

Hence we must conclude that the draft plans produced do not correspond to the interests of the great majority of I.T.U. Member-States, and that they cannot be used as a basis for discussion or as working documents by the Extraordinary Administrative Radio Conference

Stop It follows that the duties entrusted to the I.F.R.B. have become pointless

Stop This being so,

(12) - 3 -

the conditions required for the Board to perform its duties, as laid down in Article 6 of the Convention, do not exist Stop

We therefore conclude that only the Ordinary Administrative Radio Conference is competent to solve the problems arising from changes in the Regulations, and to prepare the bases for a list such as would respect the interests of all I.T.U. Member-States Stop A breach of the principles enunciated above would have serious consequences for the aeronautical, broadcasting, radiotelegraph, radiotelephone and other services Stop

The Bulgarian Administration will continue to further the cause of international collaboration in the sphere of radiocommunications +

(13)

CANADA

N° 13.1

May 27, 1950

Comments on : A, C, E, F.

I have the honour to refer to Circular Letters N°s 20/20, 20/30, 20/59, 20/72, and 20/73 dealing with the action taken by the Provisional Frequency Board (P.F.B.) on the basis of the Atlantic City Resolution relating to the preparation of the new International Frequency List and the distribution of material prepared by the P.F.B.

The Canadian Administration wishes to make the following general observations concerning the various matters dealt with in the above mentioned Circular Letters and preliminary detailed comments are appended hereto concerning proposed assignments within the low frequency bands 14-150 kc/s, the Maritime Mobile Service bands 4063 -- 4438 kc/s

6200 -- 6525 kc/s
8195 -- 8815 kc/s
12330 -- 13200 kc/s
16460 -- 17360 kc/s
22000 -- 22720 kc/s

the Fixed Service bands

4000 -- 4063 kc/s (F)
4438 -- 4650 kc/s (G)
4750 -- 4850 kc/s (H)
4850 -- 4995 kc/s (I)
5005 -- 5060 kc/s (J)
9040 -- 9500 kc/s (Q)
9775 -- 9995 kc/s (R)
10100 -- 11175 kc/s (S)
11975 -- 12330 kc/s (U)
13360 -- 14000 kc/s (V)
14350 -- 14990 kc/s (W)
17360 -- 17700 kc/s (Y)
18030 -- 19990 kc/s (Z)
20010 -- 21000 kc/s (aa)
21750 -- 21850 kc/s (bb)
22720 -- 23200 kc/s (cc)
23350 -- 25600 kc/s (ee)
26100 -- 27500 kc/s (ff)

for which bands the P.F.B. has prepared contained plans, also within the bands

11400 -- 11700 kc/s (T)
15450 -- 16460 kc/s (X)

for which the P.F.B. has prepared extended plans not greatly in excess of the spectrum space available.

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1. The directives to the P.F.B. contained in the Administrative Council Resolution N° 154 have been complied with .
2. The Canadian Administration is greatly concerned that requirements filed with the P.F.B. for the bands listed below are such that even with "consolidation" by some Administrations, it was not possible to prepare contained plans :

5060-5250 kc/s	(K)	}	Due to the large number of requirements for these bands, the P.F.B. has prepared reports only.
5250-5450 kc/s	(L)		
5730-5950 kc/s	(N)		
6765-7000 kc/s	(O)	}	The P.F.B. has prepared an extended channeling plan for circuits over 3000 km only.
7300-8195 kc/s	(P)		

The situation in these bands would appear to be quite serious and in the opinion of the Canadian Administration, should receive priority consideration by the Extraordinary Conference.

3. It would appear that the P.F.B. has endeavoured in all cases to assign frequencies now in use by existing fixed services, although these frequencies are in the bands allocated to the Fixed Service in the Atlantic City Table of Frequency Allocations. Several large networks in Canada are affected and the frequencies now in use should not be changed unless absolutely necessary.
4. The P.F.B. proposed assignments in the Maritime Mobile bands between 4000 and 23000 kc/s, also in the low frequency bands 14-150 kc/s are generally satisfactory although some changes will be necessary, particularly in the latter band.
5. The preliminary detailed comments appended hereto do not necessarily contain all the objections of the Canadian Administration to the P.F.B. plans, particularly in the case of adjacent channel assignments to the same area.

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N° 13.2

August 1, 1950

Further to my letter of May 27th, 1950, I am attaching herewith additional comments to the draft new International Frequency List.

Note : The detailed remarks and comments annexed to the two previous letters have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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No. 13.3
C.A. Res. 200

(Received on 23 November, 1950)

Comments on: A, B and I

Reference 157/18 Book of Resolutions fifth session Administrative Council not yet received Stop Concerning IFRB request would advise no additions to general and detailed comments on PFB plans contained Canadian Administration letters May twenty seventh and August first * Stop Aero-nautical Conference plans are generally acceptable on basis United States Canada RDARA discussions Stop Anticipate coordination of Canadian frequency lists for Region 2 bands below four thousand kc/s will be completed by January 31 next +

* Published under Nos. 13.1 and 13.2 respectively.

(14)

CHILE

Nº 14.1

11 July, 1950

P.F.B. frequency list received July 1st Stop Request time extension
until August 15 to send our observations +

(15)

CHINA

N° 15.1

7 June, 1950

Comments on : A and F.

While acknowledging receipt of your Circular Letters N° 20/20, February 10 ; 20/30, March 2 ; 20/45, March 16 ; 20/59, April 6 ; 20/72, April 28 and 20/73, May 1, with five copies of annexes, we wish to say that other documents having connection with the above Circulars have as yet not been received.

In the absence of certain documents delayed on the way, it is impossible for us to make a complete survey of the stretch of work in its entirety, much less for us to make overall observations and proposals, as the case may be, within the time limit mentioned in Circular N° 20/59.

However, for the sake of facilitating your secretarial work, we give our observations and proposals which have been made from the documents already on hand.

1. With reference to Circular N° 20/20 concerning Aeronautical Mobile OR service, we propose that at least one frequency for each of the bands of 11 Mc/s, 13 Mc/s and 15 Mc/s be allotted to us for long distance services.
2. With reference to Circular N° 20/72, it is to be noted that China has asked for an allotment of 97 channels, of which 23 are for international services, while 74, for national purposes. These requirements were submitted during the period from February 25, 1948 to February 1, 1950. But on checking the allotted frequencies with the linking stations in corresponding countries mentioned in the draft list, we find that there are only 9 channels ; viz. from 931 to 939, while for national services, there does not appear any at all. Again, out of the 9 allotted, there are only two channels for Taiwan-Philippines, which are far too few for actual requirements, especially at the present moment when large number of new channels are required to serve the interests of countries concerned.

It is hereby requested that the whole 97 channels be assured to us to meet important requirements.

We enclose herewith a list showing three sections of channels, which have been either opened to work, or in the course of preparation for opening within this year.

We reserve the right to make further observations when the delayed documents are to hand.

Note : The list contained in the Annex to the previous letter has been classified in the files which are at the disposal of the Extraordinary Administrative Conference.

VATICAN CITY

(STATE OF)

No. 16.1
C.A. Res. 200

12th December, 1950.

Comments on : the whole of the draft list.

Reference telegram 157/18 of 18th November Vatican City accepts draft new frequency list established by P.F.B. as a basis for discussion. Stop For the time being no other comment to formulate +

No. 16.2
C.A. Res. 200

6th March, 1951.

Comments on : E, F

Observations on the draft frequency assignment plans
prepared by the P.F.B. (fixed services)

- Circuit 1 - The frequency complement planned includes 4 frequencies, but according to the drafts there are to be only 3 (bands L, P, U); the omission must be made good and a fourth frequency assigned in band Q.
- Circuit 2 - A fourth frequency in the band U is also necessary, but the frequency already planned for circuit 1 (12 137.75 kc/s) could be used.
- Circuit 5 - a) In the present draft there is an inadmissible gap between the bands P and V (7-8 and 13 Mc/s).
One frequency of the order of 9 Mc/s is required:
in December (solar activity low and medium),
one frequency of the order of 15 Mc/s is required:
at the equinox (solar activity slight),
and in June (solar activity medium).
The frequencies in the bands Q and W planned for circuit 2 might also be used for circuit 5.
- b) One frequency of the order of 5 Mc/s is also required on December evenings (solar activity slight); the frequency planned for circuit 1 might be used to this effect.
- Circuit 6 - There is an inadmissible gap in the draft between the bands U and aa (12 - 20 Mc/s) particularly since 12 Mc/s usually gives too slight a field. These frequencies are in general badly received and are of use only during the transition period.
One frequency of the order of 15 Mc/s is required:
in December (solar activity slight, medium and great),
at the equinox (solar activity slight),
on June evenings (solar activity slight and medium).

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The frequency from the band W planned for circuit 2 might be used.

One 17 or 18 Mc/s frequency (bands Y or Z) is required:
 at the equinox (solar activity medium),
 in June (solar activity slight, medium and great).

The frequency planned for circuit 5 (band Y, according to the draft) could be used.

(18)

PORTUGUESE COLONIES

N° 18.1

27 May, 1950

Comments on : E and F.

With reference to your circular letters Nos 20/59 and 20/72, dated 6 and 28 April 1950 and No. 20/73 of 1 May, I have the honour to send you herewith 25 charts :

- 1 concerning document 764-F (List of requirements submitted between 25/2/1948 and 1/2/1950) ;
- 19 concerning the preparation of the new international frequency list;
- 2 concerning the aa and bb bands ;
- 3 concerning the frequency requirements for inclusion in the K, L, M and N bands.

On all the charts the Administration of the Portuguese Colonies has made what it believes to be the most justifiable remarks.

We have also observed that several circuits of the Portuguese Colonies have been eliminated and the Administration of the Portuguese Colonies reserves the right to retain them.

The Administration of the Portuguese Colonies reserves the right to submit detailed comments on the above to the Extraordinary Radio Conference at the Hague.

Note: The detailed remarks and comments contained in the sheets annexed to the preceding letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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Nº 18.2

26 June, 1950

Referring to your letter PFB 13/78 of 20 June, I have the honour to enclose copies of requirements for the coast stations of the State of Portuguese India and the Portuguese Colonies of Macao and Timor, submitted between 25 February 1948 and 1 February 1950. They were sent on 1 November, 1948, with letter Nº 3033/IV, to the Director of the International Telecommunication Bureau. I also have the honour to inform you as follows :

1. The sheet which refers to document 764 - F (list of requirements submitted between 25 February 1948 and 1 February 1950) contains only our comments on the booklets annexed to that document. In addition to the frequencies contained in the P.F.B. booklets, the Portuguese Colonies also claim those included in the list sent to you.
 2. The Portuguese Colonies do not refuse the frequencies proposed by the P.F.B. but they claim in addition those which are contained in the sheets that accompany letter Nº 1447/IV/230 of 27 May, 1950.
 3. The Portuguese Colonies have no comments to make on band L.
-

(18) - 3 -

Nº 18.3
C.A. Res. 200

30th December, 1950

Comments on : E, H, J

Further to the General Secretariat's letter Nº 9.6/764, of 14th October 1950, I have the honour to convey the following information.

The Administration of the Portuguese Colonies, having taken no active part in the work of the P.F.B., nor in the Region 1 and Region 3 Conferences, nor in the preparation of the African Plan, limits its comments to those services which are of particular concern to it.

Thus, in accordance with paragraphs a) and b) of Annex 15 to the letter of 14th October 1950 (Administrative Council Resolution Nº 200), I would inform you that :

1) By letters of 27th May and 26th June 1950⁺, the first of which was addressed to the General Secretariat, the second to the Chairman of the P.F.B., this Administration submitted its comments on the P.F.B.'s plans, as despatched with circulars N^{os} 20/59 and 20/72 of 6th and 28th April 1950.

2) As you can see for yourself from charts 1 to 15, two copies of which are enclosed, many of the frequencies requested by us not only at Atlantic City, but also previously, to meet our minimum requirements, have been ignored, not only in the P.F.B.'s plans, but also in those evolved by the Region 1 and 3 Conferences and in the African Plan.

This being so, we are unable to approve these plans, except for those appertaining to the aeronautical mobile R and OR services. Judging from the treatment meted out to our own services, we feel that results acceptable to all can only be attained if the above-mentioned plans are equitably revised in an atmosphere of good will and mutual understanding, in the light of the requirements submitted by the various Administrations.

Note : Charts 1 to 15 have been classified in a file which is at the disposal of the Extraordinary Administrative Conference.

⁺ Published under N^{os} 18.1 and 18.2

(20)

OVERSEAS TERRITORIES OF THE FRENCH REPUBLIC

N° 20.1

25 May, 1950

Comments on : E.

Preparation of the Extraordinary Administrative Radio Conference of The Hague (1.9.50) .

Observations made with reference to the draft frequency assignment plans prepared by the P.F.B. (in two copies) .

N° of the documents	Summary	Number of documents	Remarks
1	Cards B, observations	34	
2	List of typographical errors	1	
3	Comment on the band Q	1	

N° 20.2

3 June, 1950

Comments on : J.

I have honour to send you, enclosed, three copies of a sheet giving the observations and proposals of the Administration of Oversea France, in connection with the new draft frequency list prepared by the Administrative Radio Conference for Region 3.

Note: The detailed remarks and comments annexed to the previous list and letter, have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

Additional detailed remarks and comments concerning Overseas Territories of the French Republic are shown among the remarks and comments submitted by Franco. (See N° 32.1, 32.2 and 32.3) .

N° 20.3
C.A. Res. 200

2nd January, 1951

Comments on : A,B,C,D,E,F,H,I and J

Further to Administrative Council Resolution 200 and your letter 9.6/764 of 14th October 1950, I have the honour to forward herewith the information requested in paragraphs a) and b) of the above-mentioned Resolution.

The comments and observations on individual assignments were sent to you on form of 24th May 1950* and also by the French Administration in letters dated 31st May and 6th June 1950*.

I shall therefore confine myself here to explaining my opinion on the use the Extraordinary Conference may make of each of the plans referred to in Resolution 200 :

a) 1. Band 14 - 150 kc/s : No frequency in this band is used by radio stations in the Oversea Territories of the French Republic.

2. Band 150-4000 kc/s :

Region 1 : The plan drawn up by the Geneva Conference, 1949, should, with minor amendments, be capable of leading to an agreement.

Region 2 : Information so far received from the Administrations of Region 2 seems to imply that an agreement may be reached.

Region 3 : The plan drawn up by the Geneva Conference, 1949, should, with minor amendments, be capable of leading to an agreement.

3. Maritime mobile service (radiotelegraph and radiotelephone coast stations) :

The plans prepared by the P.F.B. should, with minor amendments, be capable of leading to an agreement.

4. Aeronautical mobile service :

The plans prepared by the Administrative Aeronautical Conference, Geneva, 1948 and 1949, are acceptable for both the R and the OR services.

b) Plans drawn up by the P.F.B. (other than those referred to in a) above):

On the whole, these plans will need serious revision before they can be used as a basis for an agreement. However, for the geographical areas of interest to my Administration, certain partial regional agreements might possibly be reached on the plans for the D, E, F, G, H, I and J bands.

Similarly, the plans for the bb, cc, dd, ee and ff bands might serve as a basis for an agreement.

* letter dated 24th May, 1950 : published under N° 20.1

letter dated 31st May, 1950 : published under N° 32.2

letter dated 6th June, 1950 : published under N° 32.3

(21)

BELGIAN CONGO AND TERRITORIES OF RUANDA-URUNDI

N° 21.1

28 March, 1950

Comments on : D.

The Administration of Belgian Congo have no remarks to make concerning the draft of the list of frequencies decided upon by the P.F.B. for the 14-150 kc/s band, in so much as this band is not used by us.

N° 21.2

15 May, 1950

Comments on : E.

Further to your circular letter 20/59 of 6 April 1950, and after consideration of the documents relative to the draft new international frequency list prepared by the P.F.B., I have the honour to enclose the comments my Administration has to make with regard to the assignments which concern it.

Annex : Comments by the Administration of the Belgian Congo relative to the draft new international frequency list prepared by the P.F.B.

There were 456 requirements presented. The P.F.B. proposes to allocate to the Belgian Congo 289 frequencies, 81 of which are distributed over 60 blocks in band P (7.300 - 8.195 kc/s). The 208 others are specified individually.

It thus appears that the percentage satisfaction would be about 63 %.

However, among the frequencies assigned, various difficulties arise, due either to interference which would make traffic impossible on certain frequencies, or to a poor selection, regard being had to the propagation conditions obtaining for the frequencies in question.

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 21.3

25 May, 1950

Comments on : F.

Further to your circular letter N° 20/72 of 28 April 1950, for which I thank you, I have the honour to inform you that the Administration of the Belgian Congo has no comments to make on the list of frequency requirements to be included in bands K, L, M, N and O for which the Provisional Frequency Board has been unable to prepare an assignment plan.

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N° 21.4

15 June, 1950

Comments on : C.

Further to your circular letter N° 20/30 of 2 March 1950, I have the honour to inform you that the Administration of the Belgian Congo has no remarks to make on the draft list for coast stations operating in the bands exclusively allotted to the maritime mobile service between 4 and 23 Mc/s.

N° 21.5

29 June, 1950

Comments on : E.

Further to your circular telegram N° 92/2 of 12 ult., I have the honour to point out that :

1. the frequencies for LULUABOURG, 12.085 and 12.360 kc/s (circuits CE 263 A, 263 B, 264 A, 264 B) requested before 25 February 1948, have not been allocated to us by the P.F.B. These frequencies should be allocated at some future date, quite apart from the frequency 12.305 kc/s, which was also requested for LULUABOURG in Booklet 1 of the P.F.B. (List of requirements submitted between 25 February 1948 and 1 February 1950).
2. an assignment should also be made in the case of the frequencies 15.550 and 17.420 kc/s (circuit 410), 17.400 kc/s (circuit 411), designed for COSTERMANSVILLE. These frequencies are also shown in Booklet 1 mentioned above.

These remarks complete those given in my letters :

- 1983/65/1102 of 15/5/50
- 2110/65/1102 of 24/5/50 ¹⁾
- 2147/65/1102 of 25/5/50
- 2403/65/1105 of 15/6/50.

-
- 1) This letter concerns requirements submitted between 25 February 1948 and 1 April 1950.
-

(23)

C U B A

N°23.1

21 July, 1950

Comments on : A, B, C, E, F, H, I and J.

In view of Resolution N° 154 of the I.T.U. Administrative Council, I have the honour to expound below my Administration's attitude to the new International Frequency List prepared by the Provisional Frequency Board.

General observations : The Cuban Administration was represented in the Provisional Frequency Board, and is ready to continue its cooperation, as far as lies within its power to do so, in the work which will be done subsequently by the Extraordinary Administrative Radio Conference (the Hague, 1950), in order that the difficult problems which will confront this conference may be satisfactorily solved.

The fixed service in general : In the draft plans prepared by the Provisional Frequency Board as a preliminary to the new frequency assignment list for the fixed services, 70 % of the individual circuits required by Cuba (as a minimum) for this class of service have not been provided for. Such being the case, the Cuban Administration cannot accept these draft plans.

The Cuban Administration understands the insuperable difficulties besetting the Provisional Frequency Board in its struggle with the problems arising out of the excessive volume of requirements in relation to the frequencies available, and trusts that the Conference will find some method or criterion to reduce the acuity of these problems and find a satisfactory solution.

The aeronautical mobile service : The Cuban Administration agrees with all parts of the frequency assignment plan for the R and OR bands, as adopted at the first and second sessions of the International Administrative Aeronautical Radio Conference, held in Geneva, provided that, when the plan is finally adopted, the final recommendations prepared by the Joint Meeting of the Caribbean, South American and South Atlantic Regions (Havana, April/May 1950) are adopted in their entirety by the Conference in so far as the R bands are concerned.

The maritime mobile service : The Cuban Administration has studied the Maritime Plan prepared by the Provisional Frequency Board, and agrees with the frequency lists drawn up for radiotelegraph and radiotelephone coast stations ; it objects, however, to the limitation of protection to the radiotelegraph coast service, since Cuba wishes to communicate not only with ships flying the Cuban flag but also with any other ships at will, in any part of the world. It also objects to the fact that in the 12 Mc/s band, only one frequency has been assigned for the coast telegraph service.

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The P.F.B. List for the band 14 - 150 kc/s : The Cuban Administration has no objection to make to the list for this band, as proposed by the Provisional Frequency Board.

The regional bands : The lists for Regions 1 and 3 are acceptable for the Cuban Administration, since, provided the recommendations of the I.T.U.'s technical organs and of the P.F.B. are observed, relative to power, types of antenna, etc., there should be no objectionable interference in these bands below 4 Mc/s.

As to Region 2, the Cuban Administration has prepared lists for the bands 150 - 415 kc/s, 415 - 535 and 1605 - 2000 kc/s, and these have been circulated in accordance with Resolution 1 of the Administrative Radio Conference for Region 2 (Washington, 1949), in order to reach an agreement with regard to the frequencies included in these bands.

Our Administration has been unable to finish preparing the list for the 2000 - 4000 kc/s band, but hopes to have done so in time for the forthcoming Extraordinary Administrative Radio Conference.

At the Region 2 Conference in Washington, the Cuban Delegation submitted a proposal to the effect that instead of having the frequency lists circulated, neighbouring countries should hold informal meetings to prepare lists for these regional bands. That proposal was rejected, and the Cuban Delegation gave warning of difficulties ahead. Although the Cuban Government has in fact encountered such difficulties, we are still entirely prepared to collaborate in overcoming these problems.

Perhaps you would excuse the delay in sending these comments. The relevant documents were received by the Cuban Administration so late that it was impossible to send the comments on them any earlier.

(24)

DENMARK

N° 24.1

31st May, 1950

Comments on : C, D, E and F

With reference to your circular letter N° 20/59 of 6 April 1950, I have the honour to enclose herewith the comments, corrections, etc., to the draft frequency plans you sent me.

Note : The detailed remarks and comments annexed to the preceding letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 24.2

1st June, 1950

Comments on : A

Referring to your circular letter N° 20/20 of 10 February, 1950, I have the honour to inform you that the Danish Administration has no comments on the draft it received from you.

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No 24.3
C.A. Res. 200

14 December, 1950

Your telegram of 18 November No 157/18 Stop We have no further commentaries in accordance with paras. a) and b) of Resolution No 200 ♦

(26)

EGYPT

N° 26.1

30th May, 1950

Comments on : A, C, E and F.

In conformity with paragraph 7 of Resolution N° 154 of the Administrative Council (4th Session), I have the honour to inform you the following :

1. Reference is made to your circular letter N° 20/20 dated 10th February, 1950, the draft of the new international Frequency List of the Aeronautical Mobile "OR" Service is acceptable to this Administration.
2. Reference is made to your circular letter N° 20/30 dated 2nd March, 1950;
 - a) the draft plan for frequency assignments to coastal telegraph stations between 4 Mc/s and 23 Mc/s is acceptable to this Administration.
 - b) the report of the maritime group on frequency assignments to coastal telephone stations for the 4 Mc/s and 8 Mc/s is acceptable to this Administration. As regards the assignment Plan for the 13 Mc/s and 17 Mc/s, Egypt cannot share the same frequencies with the United Kingdom's 15 K.W. station, namely 13188.3 kc/s and 17348.3 kc/s respectively. This Administration reserves its rights to come back to this matter at the Extraordinary Conference.

3. As regards the other bands prepared by the P.F.B. this Administration has the observations which are mentioned below to submit at present.

Due to the fact that the published lists for the said bands have been received by this Administration only three weeks before the date of the 1st June, 1950, a complete analysis of the frequency sharing carried out by the Working Groups, where a contained plan was possible, could not be studied by this date. The Egyptian Administration therefore, reserves its rights to forward further observations and comments in the near future for submission to the Extraordinary Conference.

Band E : Circuits Nos CX 191 & CX 193 are two different categories of met. broadcast. Sharing frequency 3992,5 kc/s between them cannot be accepted. Both services have to operate at the same time. F CX 193 should therefore be assigned another frequency in the same band.

Band H : The frequency 4825 kc/s is assigned to both circuits L CX 56 & L CX 57. The corresponding two base stations operate simultaneously with their respective group of mobile stations and belong to two different organisations. The varying distances of the receiving stations, being mobile, from their respective base, necessitate the use of the same order of frequency by the two circuits at the same time most of the day. This consolidation cannot therefore be accepted by this Administration. Those two circuits need two different frequencies in the "H" band.

Band M : The medium frequency of CX 160 is missing.



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Band "O" : Due to the natural geographical position of the radio centres incorporated in our National Communication Systems, applying the Board's Engineering Rules, most of the calculated day frequencies have fallen in the band "O". Since this band is comparatively narrow i.e. 235 kc/s wide, this Administration suggests that requirements which cannot be included in this band are to be shifted to the next band "P" which is 895 kc/s wide. In our opinion, an adjustment of the loading for the two bands "O" and "P" can be effected at least for area 13 where, according to statistics, most of the requirements in that area are for day operation. This is a matter to be forwarded as a proposal to the Extraordinary Radio Conference.

Band "P" : The top frequency for circuit FOX 188 is missing.

Band "Q" : Serious re-consolidation was done by the Working Group to our requirements in this band. The consultation of our representative who was present and drew the attention of the Working Group in due time was ignored, the fact which we regret very much. Such an action by the Working Group apart from being outside the competence of the P.F.B., is contrary to the decision taken by the Provisional Frequency Board itself.

For example, the Group assigned frequency 9196.25 kc/s to circuits Nos CX 7, CX 15, CX 35 & CX 54 is obviously an impossible procedure. The operational details were explained at an early stage to the Working Group by our Representative. Circuits Nos CX 35 & CX 54 are indicated press circuits operated by two different Administrations with two different kinds of emission and intended to serve an area varying from 400 to 1300 kilometres and from 400 to 3500 kilometres respectively. Those two broadcasts have to use that order of frequency most of the 24 hours of the day simultaneously.

Other similar re-consolidation was carried out to our requirement which is completely inapplicable.

Under such circumstances, the contained plan in the "Q" band is unacceptable to this Administration.

The top frequency of circuit F CX 137 is missing.

I take this opportunity to convey my Administration's appreciation for the big effort paid by the participants to the P.F.B. and to the other conferences of the Union which took part in the work of the draft New International Frequency List and the associated Technical Principles.

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No 26.2
C.A. Res. 200

9 November, 1950

Comments on the Copenhagen Plan

Yours No 157/18 Stop In addition to comments submitted on 30th May, 1950 * in reply to your circular letters 20/20 dated 10th February and 20/30 dated 2nd March the Egyptian Administration would like to add the following Stop The Egyptian Administration did not sign the Copenhagen medium wave broadcasting Plan because of the following reasons Stop First the Copenhagen Conference has not fulfilled the stipulation laid down by the additional protocol to the Acts of the International Radio Conference of Atlantic City 1947 signed by the delegates of the European region especially in regards allocating exclusive wave to Egypt main station as stipulated in the document annexed to the additional protocol Stop Second Allocations to Egypt are not protected to the standards adopted by the Conference Stop For these reasons the Egyptian Administration requests that the allocations to Egypt should be reconsidered Stop Reference can be made to the statement of Egypt and Syria annexed to the Copenhagen Convention +

* Published under No 26.1

(27)

EL SALVADOR

(REPUBLIC OF)

Nº 27.1

4 July, 1950

I have the honour to send you herewith the list of frequencies which this Administration thinks should be reserved for El Salvador for the future, so that the Provisional Frequency Board may take it into account when drawing up the list of frequencies which will be submitted for consideration to the Extraordinary Administrative Conference to be held in September of this year.

Note : The list annexed to the preceding letter has been classified in a set of files which are at the disposal of the Extraordinary Administrative Conference.

(29)

UNITED STATES OF AMERICA AND TERRITORIES OF THE UNITED STATES OF AMERICA

N° 29.1

29 May, 1950

Comments on : A, B, C, D, E, F, G, H, I and J.

The enclosed document contains the comments of the United States of America and the Territories of the United States of America with respect to the reports and draft frequency assignment plans prepared pursuant to Resolution N° 154 of the Fourth Session of the Administrative Council.

It will be appreciated if, when circulating this document to the Members of the Union, you will indicate that these comments were prepared as of May 29, 1950 and that the United States and the Territories of the United States will naturally have further comments, observations, and proposals to make when the Extraordinary Administrative Radio Conference meets at The Hague on September 1, 1950.

I shall be grateful if you will be so good as to acknowledge the receipt of this letter.

COMMENTS OF THE UNITED STATES OF AMERICA AND THE TERRITORIES OF THE UNITED STATES OF AMERICA WITH RESPECT TO THE REPORTS AND DRAFT FREQUENCY ASSIGNMENT PLANS PREPARED PURSUANT TO THE RESOLUTION RELATING TO THE PREPARATION OF THE NEW INTERNATIONAL FREQUENCY LIST ADOPTED BY THE INTERNATIONAL RADIO CONFERENCE OF ATLANTIC CITY 1947 AND RESOLUTION 154 OF THE FOURTH SESSION OF THE INTERNATIONAL TELECOMMUNICATION UNION'S ADMINISTRATIVE COUNCIL REGARDING THE EXTRAORDINARY ADMINISTRATIVE RADIO CONFERENCE SCHEDULED TO CONVENE AT THE HAGUE, SEPTEMBER 1, 1950.

1. GENERAL

The United States considers that world radio usage makes it essential that the frequency allocation table of Atlantic City 1947 be implemented at the earliest practicable date in the most efficient and orderly manner possible, and thereby insure the maximum benefits for all services. Accordingly, the United States proposes that all members of the International Telecommunication Union come to the Extraordinary Administrative Radio Conference with a firm determination to work out methods at the Conference to achieve this goal.

2. AERONAUTICAL MOBILE SERVICE

It is the view of the United States that the allotment plan for the "R" bands agreed to at Geneva by the International Administrative Aeronautical Radio Conference (I.A.A.R.C.) is satisfactory and should be adopted by the Extraordinary Administrative Radio Conference. This view is based on the fact that the I.A.A.R.C. plan is not a station assignment plan but is a plan which allots frequencies to areas and sub-areas, and that it satisfactorily meets for the Aeronautical Mobile "R" Service the objectives of the P.F.B.

The I.A.A.R.C. Allotment Plan agreed to at the I.A.A.R.C. for the "OR" Service is acceptable to the United States on the assumption that it will be possible at the Extraordinary Administrative Radio Conference to add the names of additional specific areas to certain frequencies mentioned in the plan. The United States will have specific proposals in this regard at the Conference. It is not believed that these proposed additions will increase the possibilities of interference between frequencies allotted to the several administrations in this plan.

3. BROADCASTING SERVICE

Observations regarding frequency assignments in the bands allocated to the broadcasting service cannot be made until the results of the High Frequency Broadcasting Conference now in session in Italy are known.

4. FIXED SERVICE

4000 - 27500 kc. None of the plans prepared by the P.F.B. for the various bands of frequencies are acceptable to the United States for implementation as presently written and they will require revision or other acceptable methods will have to be devised to achieve the implementation of these bands. There are many factors which contributed to the unacceptability of the plans for these bands but the basic one is the excessive number of requirements with which the Board had to deal.

Unless the member states are willing to limit their requirements to their present essential operations, eliminating those which do not require international protection, reducing those needing maximum international protection to the minimum necessary, and satisfying their other requirements with the lesser protection afforded by notification status, it is the view of the United States that it will not be possible to rewrite satisfactory lists for these bands. In this connection it should be borne in mind that opportunities for obtaining the use of additional frequencies will not be foreclosed by the adoption of the initial international frequency list. Administrations will be free to use frequencies from the appropriate bands in the spectrum to accommodate further operations under the mechanism already provided for by the Radio Regulations of Atlantic City through the medium of the International Frequency Registration Board.

The spectrum space allocated to the Fixed Service by Atlantic City is less than that allocated by Cairo. Consequently, only by making very efficient use of this reduced spectrum space will it be possible for the countries of the world to conduct their essential operations satisfactorily. Attempting initially to provide for anything but essential operations on other than a notification basis not only makes the compilation of an acceptable list hopeless but also jeopardizes the possibility of providing satisfactorily for the essential operations of any country.

The United States considers that the basic objective of bringing the Atlantic City Frequency Allocation Table into force must be attained by The Hague Conference and is currently conducting comprehensive studies of the various problems now facing the Union in this regard in an effort to find acceptable methods of attaining this objective. The United States earnestly hopes that the other member states will do likewise and that their delegations will come to the Conference prepared in this regard. With this as a foundation and with an attitude of cooperation and good will, plus a determination to implement the Atlantic City Allocation Table, it should be possible for the Conference to evolve methods which are acceptable to the member states and which in turn will make possible the maximum use of the available spectrum space by all countries.

5. MARITIME MOBILE SERVICE

(a) Coastal Telephone. The Coastal Telephone Frequency List can be accepted by the United States if two additional frequencies in each of the 4 and 8 Mc bands are provided for use in the inland waterways of this country. The United States will have specific proposals as to frequencies for such use for presentation at the Extraordinary Administrative Radio Conference.

(b) Coastal Telegraph - 4000 - 27500 kc. Examination of the frequency lists for the Coastal Telegraph Service indicates that they may form the basis of agreement at the Extraordinary Administrative Radio Conference. Some co-channel adjustments will be required and some adjacent channel problems exist which must be corrected. The United States expects to have proposals in this regard for presentation at the Conference.

The Frequency Lists prepared for the Coastal Telegraph Bands were based on the three following assumptions:

- (i) That A2 emissions would not be used.
- (ii) That the service of any particular coast station would be protected within areas of approximately 2000 Km, 3000 Km, and 6000 Km radius in the 4, 6, and 8 Mc bands respectively.
- (iii) That maximum power limitations would be placed on all coastal stations.

Assumptions (i) and (iii) can be accepted by the United States. Assumption (ii) is contrary to the present operating practices of the United States; It is anticipated that the United States Coast Stations will always want the right to communicate with United States ships in all parts of the world, and for this reason assumption (ii) above is unacceptable.

The Coastal Telegraph Plan includes a recommendation that continuous transmission by use of call slips by coastal telegraph stations when not actually engaged in working would be forbidden. The United States cannot accept this recommendation as a basis for considering the draft frequency list. However, after implementation, the United States is willing to review the extent to which this operating practice may be modified.

6. REGIONAL BANDS

(a) Region 1. In general the Region 1 list is acceptable to the United States. However, there are certain assignments which it appears will cause harmful interference and the United States Delegation will be prepared to discuss these at the Conference. These are, of course, in addition to the changes which it is expected will be submitted by the United States in accordance with paragraph 2, page 236 E of the Final Acts of the Region 1 Conference.

(b) Region 2. The United States lists for the bands 150 - 415 kc, 415 - 535 kc, and 1605 - 2000 kc have been circulated to the countries concerned for comment and some comments have been received. However, since comments have not yet been received from all of the countries concerned, and as it is expected that some of the countries will also have lists which will be circulated for comment, the coordination is not yet complete for these bands.

The United States expects to have its list for the band 2000 - 3500 kc completed in the near future and will circulate it to the countries concerned for comment.

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The United States is cooperating to the fullest extent in an effort to insure that coordination within Region 2 for all of the regional bands will be effected by the time the Extraordinary Administrative Radio Conference convenes, and that the Region 2 lists resulting from this coordination will be available at the Conference.

(c) Region 3 In general the Region 3 list is acceptable to the United States. However, there are certain assignments which it appears will cause harmful interference and the United States Delegation will be prepared to discuss these at the Conference. These are, of course, in addition to the changes allowed by Article 2, Part 1, of the Final Acts of the Region 3 Conference.

7.P.F.B. LIST 14 - 150 KC

The United States Delegation to the Provisional Frequency Board has already called the attention of the Board to the fact that certain essential United States requirements were omitted from the list prepared for this band. Furthermore, the list presents serious adjacent channel problems. Accordingly, the United States considers that this list is unacceptable as presently written, and it will require revision or other acceptable methods will have to be devised to achieve the implementation of this band.

(30)

ETHIOPIA

N° 30.1 (received 6. 9.50)

August 25, 1950

Comments on : the whole of the draft list

I received the draft frequency lists prepared by the Provisional Frequency Board greatly delayed; actually on August 7th 1950.

My experts are now studying them and I will let you know our views and comments at the first opportunity.

However, I must inform you that our first perusal indicates that the draft list is not acceptable to Ethiopia because all the frequencies that have been registered and in use for some time by Ethiopia have been ignored.

Ethiopia's requirements are very modest and I am sure that they can be added to the list without interfering the plan as at present drafted.

FINLAND

N° 31.1

27 May, 1950

Comments on : D.

With reference to your circular letter No. 20/45 of 16.3.50, I have the honour to submit the following amendments :

1. The transmitter mentioned in our requirement F-DI-1-Helsinki will be transferred to Nummela, and its power will be raised to 40 kW.

Page 7, columns 3c and 8, read :

/ Nummela 60° N 24° E - Finl / 40 /

2. The transmitter mentioned in our requirement F-DI-2-Helsinki will also be transferred to Nummela :

Page 12, columns 3c and 5, read :

/ Nummela 60° N 24° E - Finl / 1700
600 /

N° 31.2

27 May, 1950

Comments on : E.

Referring to your circular letter N° 20/59 of 6.4.50, I have the honour to enclose herewith a corrected list for insertion in the annexes to circular in question.

In our letter N° V. 8355 of 17.12.1948 addressed to the P.F.B. concerning our requirements F-DI-8 and F-DI-14, in the column "Remarks" we indicated A3b (SSB-2) also as the type of emission, for which the corresponding entry is missing from Column 7. This fact has been taken into account in the list of amendments.

N° 31.3

27 May, 1950

Comments on : F.

Referring to your circular letter N° 20/72 of 28.4.50, I have the honour to enclose herewith a corrected list for insertion in the annexes to the circular in question.

In our letter N° V. 8355 of 17.12.1948 addressed to the P.F.B. concerning our requirements F-DI-8 and F-DI-14, in the column "Remarks" we indicated A3b (SSB-2) also as the type of emission, for which the corresponding entry is missing from Column 7. This fact has been taken into account in the list of amendments.

Note : The detailed remarks and comments annexed to the two previous letters have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 31.4

30 May, 1950

Comments on : C. (telegraphy).

Further to your circular letter N° 20/30 of 2.3.1950, I have the honour to inform you as follows :

The HF frequencies in the 4, 6, 8 and 13 Mc/s bands were proposed for the use of the Finnish coast stations. As Finland subsequently, however, also needed frequencies in the 16 and 22 Mc/s bands and as the 17 Mc/s band is already used by our coast stations, Finland is requesting :

- 1° frequencies in the 16 and 22 Mc/s for Kotka Radio OHF (C-DI-9) ;
 - 2° that account should be taken of the fact that the power of our requirements C-DI-8 and C-DI-9 will be increased to 3 kW ;
 - 3° that account should be taken of the fact that in column (10) the schedule (H) given for the coast station Kotka may be changed ; I would therefore ask you to enter the word "Intermittent" (I) in this column.
-

N° 31.5

30 May, 1950

Comments on : C (telephony).

In reply to your circular letter N° 20/30 of 2.3.50, I have the honour to inform you as follows :

Channel HF N° 5 has been proposed for the use of the Finnish maritime radiotelephone service. In List A there are assignments for Finland in the 4, 8 and 13 Mc/s bands. As the 17 Mc/s band is already being used by our coast stations and as it is highly probable that frequencies in the

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22 Mc/s band will be in use before the new Frequency List comes into force, I take the liberty of asking you to include in List A, opposite the frequencies 17325,2 kc/s and 22685,2 kc/s :

Finland (3),

these frequencies to be used by the public service coast station mentioned in our requirement C-DI-9-Kotka.

At the same time, I would inform you that the powers given for our requirements C-DI-8 and C-DI-9 in List A in the 6, 8 and 13 Mc/s bands will be raised to 3 kW.

The schedules 17/01, 17/03 and 06/16 given in column (10) of List B for the Kotka coast station will be changed. That is why I am asking you to be so good as to enter "Intermittent" (I) in that column.

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Nº 31.6
C.A. Res. 200

9 December, 1950

Comments on : H and the whole of the draft list

I have the honour to inform you that my Administration has no comments of substance to make on :

- a) the assignment plans already prepared for bands below 4 000 kc/s and for the maritime mobile and aeronautical mobile services;
- b) the draft assignment plans for the bands 4 000 - 27 500 kc/s, other than those indicated in a) above.

In my letters N^{OS} V. 5957 and V. 5959, of 27 May 1950*, and N^{OS} V. 5963 and V. 5965, of 30 May 1950**, addressed to the Secretary General of the Union, I submitted remarks and proposals in connection with the draft assignment plans mentioned above. I would draw the attention of the I.F.R.B. to two cases in which power has been increased by my Administration during the autumn, and to one in which an increase will be made before the end of the year.

In accordance with the proposal made by the Administrative Radio Conference for Region 1 (Geneva, 1949), the maximum powers indicated by us, namely, 1.0, 0.2 and 0.5 kW, have been requested for our requirements C DI 5 Helsinkki (2 810 and 3 795 kc/s), C DI 7 Kotka (2 649 kc/s) and C DI 11 Mariehamn (1 855 kc/s). As a result of the increases in power mentioned above, the powers used by Helsinkki and Mariehamn are now 2 kW, and the power of Kotka will be increased to 1 kW before the end of the year.

In these circumstances, we should be much obliged if you would bear these increases in mind when preparing the Frequency List in its final form.

* Published under N^{OS} 31.1 and 31.3

** Letter N^O V. 5963 published under N^O 31.4

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FRANCE

No 32.1

17 May, 1950

Comments on : C and D.

I have the honour to send you herewith, in two copies, the comments which the French Administration has to make on the frequency assignments made by the P.F.B.

- 1° in the band 14 - 150 kc/s,
- 2° in the frequency bands allocated by the Radio Regulations to coast stations between 4 and 23 Mc/s,
 - a) radiotelegraph coast stations, including a list of deletions,
 - b) radiotelephone coast stations.

No 32.2

31 May, 1950

Comments on : H.

On behalf of the following Members of the Union :

France

Oversea Territories of the French Republic and Territories administered as such

French Protectorates of Morocco and Tunisia,

I have the honour to forward to you herewith in duplicate :

1. comments on the frequency plan drawn up by the Administrative Radio Conference for Region 1, comprising :
 - a) 153 cards
 - b) a general note on the 2045 - 2065 kc/s band ;
2. an additional list of frequency requirements.

No 32.3

6 June, 1950

Comments on : E and F.

1. I have the honour to enclose, in duplicate, the comments of the French Administration on the documents which gave rise to your circular letter n° 20/59 dated 6 April, 1950.

2. You will observe that very many of these comments concern circuits with Moroccan and Tunisian call signs or with call signs allocated to the various Oversea Territories of the French Republic. The said comments should be regarded as an addition to those which you will receive direct from the administrations concerned.

3. The comments are submitted on cards of different types :

Type A : when it is necessary to comment on the circuit itself, especially when one of the frequencies of the complement calculated for that circuit has been omitted ;

Type B : when the comments concern a frequency assigned to a circuit or group of circuits in the draft plans drawn up by the P.F.B.

In addition, separate lists have been prepared for :

- a) omitted circuits, which are very few ;
- b) circuits whose examination by the P.F.B. has been postponed but which are to be studied by the Extraordinary Administrative Conference, because they will be opened very shortly ;
- c) the correction of certain typographical errors or the indication of recent changes in the technical characteristics of the circuits which do not effect the plans themselves.

4. As regards bands K, L, M and N, the French Administration observes that Document 712 and its annexes contain in substance an account of the principles and working methods that Group 4 intended to apply in drawing up an assignment plan.

It notes that, in the preamble to its report, the said Group describes the general difficulties it met with which, however, as it admits, do not provide an excuse for its failure to conclude its work, since these difficulties were the same for all the other Working Groups.

The French Administration feels that this is a regrettable state of affairs, especially since Group 4 elsewhere expresses its confidence in its ability to draw up an assignment plan for the frequency bands within the competence of the P.F.B. between 5065 and 5950 kc/s.

The French Administration does not wish to comment on the general considerations developed in Document 712. It feels that any undertaking of this kind would be pointless after the eighteen months' technical work of the P.F.B. In its work on the draft plans submitted, the French Administration has voluntarily restricted itself to an examination of concrete cases. It feels, however, that Document 712 does not provide the elements required to conduct a discussion in this spirit.

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5. As regards band O, for which an uncompleted plan has been published (Document 716 P.F.B.) and since the list of requirements needing frequencies in this band has been compiled in the same way as for bands K, L, M and N, the French Administration also refrains from making any comment. It is of the opinion that the problem of assignments in the K, L, M, N and O bands should be reviewed as a whole by the Extraordinary Administrative Conference.
6. The French Administration regrets that it could not respect the time limit laid down in Resolution 154 of the Administrative Council for the submission of its observations to the General Secretariat of the I.T.U. The delay was due to the fact that it did not receive the documents for study until 12 April, that is, 12 days late.

However, we sent you at various times before the prescribed date :

1. Remarks on :
 - a) the draft assignment plan for the 14 - 150kc/s band ;
 - b) the draft assignment plans for coast stations, both radiotelegraph and radiotelephone ;
 - c) the plans annexed to the Final Acts of the Radio Conference for Region 1.
2. Frequency lists for Region 2 in accordance with Resolution N° 1 of the Washington Conference.

Note : The detailed remarks and comments annexed to the three previous letters have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 32.4
C.A. Res. 200

14th December 1950.

Comments on : A, B, C, D, E, F, H and I

1. In accordance with Administrative Council Resolution N° 200, I have the honour to send herewith the information requested for the 15th of December.

In so doing I would draw your attention to the fact that the French Administration, for the sake of simplicity, makes no distinction between the various frequency plans to be examined by the Extraordinary Administrative Radio Conference, contrary to the provisions of Resolution 200.

Thus we may conveniently divide the data requested into three classes:

- 1) comments on individual assignments;
- 2) comments on the draft frequency plans;
- 3) information as to whether or not each of the plans is acceptable individually without major transformations.

2. As regards individual assignments, I would remind you that in the following communications :

2/361 CR of 17th May, 1950
2/368 CR of 31st May, 1950
2/371 CR of 6th June, 1950
2/375 CR of 8th June, 1950*,

you have been sent a collection of remarks which constitute our final comments on all the various plans mentioned by Resolution 200.

3. In its letter 2/371 CR*, the French Administration stated that it had deliberately restricted its comments to concrete cases. We are of the opinion that general comments can only throw into relief something which is now evident : that in many cases, the new frequency list cannot be drawn up in accordance with the Atlantic City Resolution.

Hence the French Administration will make no comments.

4. As to whether the frequency plans are acceptable or not, we would make the following observations :

1) Band 14 - 150 kc/s : This plan is acceptable with certain amendments.

2) Band 150-4000 kc/s :

a) Region 1 : the plan is acceptable without major transformations, and might serve as a basis for discussion.

b) Region 2 : the communications received from Region 2 Administrations in accordance with Washington Resolution N° 1 give reason for believing that an agreement will be possible.

* Letter 2/361 CR of 17 May, 1950 : published under N° 32.1
Letter 2/368 CR of 31 May, 1950 : published under N° 32.2
Letter 2/371 CR of 6 June, 1950 : published under N° 32.3
Letter 2/375 CR of 8 June, 1950 : published under N° 61.2

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3) R and OR Aeronautical Mobile between 2.85 and 24 Mc/s :

These plans are acceptable as they stand.

4) Maritime Mobile between 4 and 23 Mc/s :

a) Radiotelegraph coast stations :

This plan might serve as a basis for discussion, and is acceptable without major transformations.

b) Radiotelephone coast stations :

might conceivably serve as a basis for discussion but will need major amendments if it is to be acceptable.

5) P.F.B. plans between 4 and 27.5 Mc/s (apart from the maritime mobile service) :

Totally unacceptable, except perhaps for the plans drawn up for the bands bb, cc, dd, ee and ff which might be acceptable on condition other Administrations do not make proposals which would radically alter the initial plans.

I should be glad if you would kindly note that the views expressed above are also those entertained by the Administrations of Morocco and Tunisia, which have asked me to write on their behalf.

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GREECE

N° 33.1

26 July, 1950

Comments on : C, D, E and F.

1. In reply to your letters 20/30, 20/45, 20/59, 20/72 and 20/73, I have the honour to bring to your notice herewith the observations and proposals which the Greek Administration has to make with regard to the new frequency list prepared by the P.F.B.
2. Greece, wishing to facilitate the preparation of a frequency list which will meet the frequency requirements of all countries to the greatest possible degree and hence will be acceptable to all, has requested a very limited number of frequencies, barely sufficient to cover its present needs.
3. However, the P.F.B. has produced a draft plan which reduces the number of frequencies allocated to my country by almost 60 % throughout the spectrum ; this holds good more particularly in the higher bands, from 4 to 23 Mc/s. Moreover, even those frequencies allocated to us do not suit existing requirements and would not suffice to provide satisfactory transmissions. Hence my Administration finds itself unable to maintain all the radio communications it has been using over many years.
4. It is therefore clear that Greece is obliged to state that it cannot accept the new draft international frequency list as presented by the P.F.B.
5. In order to throw into relief how unfairly Greece has been treated, we are enclosing a table (Annex I) showing, by bands, the number of frequencies requested by Greece, and the number allotted. The bands shown run from 4 to 23 Mc/s.
6. Greece is not satisfied with the P.F.B.'s new draft frequency list, and is obliged to revert to its requirements as shown in the list of radio circuits, drawn up according to the decisions of the Atlantic City Conference.
7. On more general terms, Greece is of the opinion that it would be desirable to maintain the Bern frequency list and to transfer the frequencies out of band into the correct bands designated in the Atlantic City frequency allocation table.
8. Apart from these general remarks, we give our detailed observations on the frequencies allotted to Greece in a table to be found in Annex II.

9. We also enclose (Annex III) a list of the new frequencies requested by my country over and above those given in the list of radio circuits (volume II) of Atlantic City, and a table (Annex IV), showing modifications to the requirements previously notified.
10. Finally, I must inform you that there are neither British nor American stations in Greece, as has been gratuitously assumed without any statement to that effect from my Administration. Hence the frequencies shown in the P.F.B.'s draft as allotted to such stations, under the letters DS or LR, must be considered as being allotted to Greek stations.

Annex I

Bands	Number of frequencies required	Number of frequencies assigned by the P.F.B.	Remarks
4 Mc/s	8	3	
5	9	-	
6	8	-	
7	6	-	
8	5	-	
9	4	4	
10	3	2	
11	2	1	
12	4	3	
13	4	4	
14	-	-	
15	1	-	
16	1	-	
17	-	2	
18	-	-	
19	1	1	
20	1	3	

Note : The detailed remarks and comments contained in Annex II of the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files, as well as those in which have been classified the Annexes III and IV of the previous letter, are at the disposal of the Extraordinary Administrative Conference.

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Nº 33.2
C.A. Res. 200

5th January, 1951

Comments on : A, B, C, D, E, F.

Further to your letter 9.6/764 and Administrative Council Resolution Nº 200, I have the honour to inform you that the Greek Administration, in a letter dated 26th July 1950⁺, has sent in its comments on the P.F.B.'s frequency assignment plans.

I am sending you herewith a copy of these comments⁺. Further, I would stress that these plans do not include frequencies for the Greek aeronautical and meteorological services.

Hence this Administration reserves the right, at the forthcoming radio conference, to claim all the frequencies it is already using or is likely to use in the near future, to ensure the efficient operation of its services, aeronautical mobile, aeronautical fixed and meteorological. I am enclosing a list of these frequencies in two copies.

Note : The list referred to in the above letter has been placed in the files at the disposal of the Extraordinary Administrative Conference.

⁺ This letter is published under Nº 33.1

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GUATEMALA

Nº 34.1

14 April, 1950

Comments on : A

I have the honour to confirm the message of today's date signed DIRGENTEL concerning Circular 20/20 of the General Secretariat with respect to points three and four.

We have examined the list of frequencies assigned to OR stations and find that the frequencies used or planned for use in Guatemala have been omitted, in spite of the following facts :

1. At the Aeronautical Conference, Washington D.C., 1949, our Delegation submitted, along with its requirements, the charts and other documents required to justify the use of frequency channels both at home and on the established international routes. In the list of abbreviations of the Washington Agreement, Nº 32-A reads : AVIATECA GOBIERNO DE GUATEMALA. Reference to the national route segment charts will show that 12-E assigns to our country and other General American countries (Arca 12-E) the frequencies asked for and technically approved by the appropriate committee of the Conference, namely : 3.0, 3.5, 4.7, 5.6, 6.6, 9.0, 10.0, 11.3, 13.3 and 18 Mc/s. From the list of the Washington Agreement it will also be seen that pages 547 to 560 of the volume containing full details of the Aeronautical Agreement contain all the national stations of Guatemala. The Guatemala Delegation signed the agreement under the impression that its requirements, which it regarded as justified, had been accepted.
2. On 15 November 1949, my Administration, although quite certain that the Washington Agreement covered all the frequencies for the aeronautical services as a whole, including assignment for the Major R and OR Routes, in which my country appears as a segment of the routes operated by foreign companies, sent in lists of frequencies in accordance with the Regulations of Atlantic City, 1947, not only for the aeronautical services as a whole but also for all its radio services for inclusion in the lists prepared by the P.F.B. for submission to the Extraordinary Conference of September 1950. I would also point out that the Administration of Guatemala sent to all the Interamerican countries on this continent the lists of frequencies for their co-ordination in accordance with the Resolution of the Washington Agreement. So far we have received neither replies nor lists from any of these countries, with the exception of the United States of America, which has sent us its lists and the appropriate observations with a view to co-ordination, since several frequencies are repeated in both countries and it is easy to avoid interference by means of bilateral agreement for limiting power according to the type of emission and propagation characteristics, etc.

In view of the above, my Administration considers that the P.F.B.'s failure to include Guatemala's frequencies in the list for the OR services must be due to an involuntary error resulting from great pressure of work, as can be seen from the number of documents received on this point. We hope such is the case and that both this list and future lists will be corrected, so that these documents and those which will be submitted to the Guatemala Delegation at the Conference of September 1950 will act as a basis for acknowledging equal rights in the apportionment of the spectrum - an essential point for the coming Conference.

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On behalf of the Administration of Guatemala, I would request you to find out what the P.F.B. intends to do about the matter and whether (apart from the first point mentioned above - the fact that we submitted our requirements for our radio service more or less in time) we should send in new lists or submit them direct to the Conference of September 1950 for registration.

We have the following comments to make on circular N° 20/20 : my Administration takes the liberty of congratulating the P.F.B. on the system of co-ordination which led to the compilation of the list for OR stations, while deploring the unfortunate omission of Guatemala's requirements.

N° 34.2

15 June, 1950

Comments on : the whole of the draft list.

I have the honour to confirm my communication concerning the arrival of the draft frequency assignment lists in booklets comprising the international channel-frequencies within the competence of the P.F.B. My communication also expressed my Administration's disapproval of these lists, which have ignored the frequencies used by our different national and international services. As I announced in my communication, I am forwarding herewith COPY OF THE ORIGINAL REQUIREMENTS SUBMITTED IN DUE TIME, covering all the radio services in their various forms in use in Guatemala, from the frequencies in the Tropical Bands defined at Atlantic City, U.S.A. and recognized at the FIAR meeting in Washington, D.C. to the highest frequencies within the competence of the Board under the Radio Regulations. That we may be certain you have received these documents and that my Administration may avoid fresh difficulties due to loss in the post, I should be obliged if you would take steps to acknowledge receipt in good time, since it is also my wish that the Delegation of Guatemala at the Extraordinary Conference for the approval of these assignments in September next will not find itself in the position of having to raise justified obstacles in the way of a general approval, simply because our frequencies do not appear in the list which the Board will submit as the main item of the Conference. However, I am informing you in good time that our Delegation would not accept any agreement reached by the forthcoming Conference if its provisions and resolutions failed to cover the frequencies in use which are set out in the attached lists and which are comparatively few to meet our practical requirements for radio operation in our highly volcanic territory, whose geographical features prevent the installation of electrical communication networks of other types. This point has already been brought out at various Radio Conferences.

We trust that this time our appeal will be heard. We assume that lists of lower frequencies (long waves) between 550 and 1 600 kc/s will be of little use to the P.F.B. since these frequencies are of short range and

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we use them on low power to avoid mutual interference. If they were required, however, we would send them immediately. I must point out also that we use them for broadcasting exclusively.

Note : The frequency requirements shown in the list annexed to the previous letter cover the whole of the spectrum, with the exception of the band 550 - 1600 kc/s. They have been classified in the files which will be available to the Extraordinary Administrative Conference.

N° 34.3

20 June, 1950

Comments on : A and the whole of the draft list.

I have the honour to refer to your communication N° 13/5 dated 8 May 1950, informing me that our frequency requirements for the OR and R services arrived too late for inclusion in the new lists in conformity with the assignment plan, etc. I trust, however, that they will ultimately receive due attention, since we were awaiting the forms you were to send us for the despatch of our lists of requirements. So far these forms have not reached us. Because of the delay, we decided to have our own forms printed according to the Regulations and we sent you further lists which apparently never reached you either. We are sending for the third time lists of all our frequency (1) requirements in accordance with our own registers and would request you to make arrangements for the Board to extract the appropriate frequencies from these full lists, as mentioned in your letter.

Our difficulties in observing time limits are largely due to the distance which separates us. You will realize that correspondence is thereby often delayed. The new lists we have just sent you contain all our services, as we had not enough time to draw up separate lists of requirements ; we think, however, that you should have no trouble in understanding exactly what we need. We realize that the small spectrum space available cannot accomodate the enormous frequency requirements of all countries ; so we have restricted ourselves to the frequencies to which our present services are to be transferred, without claiming further frequencies for the future, except in cases of urgent necessity.

- (1) These lists have been received annexed to the letter of the 15th. June 1950.
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Nº 34.4

25 July, 1950

Comments on : E and the whole of the draft list.

I have the honour to refer to your radiotelegram PFB/13/119 of 17 July 1950, which made mention of our letters, one of which, dated 15 June 1950, was signed by Julio César Pais, and the other, dated 20 June 1950, and bearing the number 533, carried my own name.

The Department of Radiocommunications and the Inspectorate of Telecommunications have made a study of the various provisional frequency lists sent out by the P.F.B. With regard to the assignments made to Guatemala, we give below some comments which should enable you to see why certain frequency allocations made to Guatemala by the P.F.B.'s various working groups are not acceptable to us.

Band G : 4438 - 4650 kc/s.

Page 4. We shall simply refer to column 1a ; 4445.5 kc/s has been allocated to Guatemala, amongst other countries. However, Nicaragua has also been allocated this frequency ; so that there would have to be some coordination and fixing of powers. We did not request this frequency ; what we did request was 4455 kc/s, which is apparently not allocated in the Lists to any country. We should appreciate confirmation on this point.

Page 22. We have been assigned 4493 kc/s, with three kilowatts power, the hope being expressed that we should cause no interference to Chile or Venezuela during the Equinox. As such, we accept it.

Page 25. We have been allocated 4512.5 kc/s, the same hope being expressed as for the frequency mentioned above, only this time Colombia is mentioned. This latter country can be regarded as nearer to us from the point of view of omnidirectional propagation, even given a dipole antenna and an output power of five kilowatts, which we intend to use at night.

Page 36. 4580.5 kc/s has been allocated to Guatemala, Colombia, Chile, etc. We are authorized to use five kilowatts power, and the conditions are the same as for the preceding point.

Band K - 5060 - 5250 kc/s.

Band L - 5250 - 5450 kc/s

Band N - 5730 - 5950 kc/s

On page 16, Band K, and on page 37, Band L : channels have been allocated to Guatemala and other countries, but without specifying the frequencies, hence we should appreciate an explanation. The same state of affairs obtains as regards Bands O (6765 - 7000 kc/s), P (7300 - 8195 kc/s).

Band Q - 9040 - 9500 kc/s.

Page 45. Guatemala has been allocated 9263.25 kc/s. This we accept.

Band R : 9770 - 9995 kc/s

Page 4. The frequency 9792.87 kc/s has been allocated to the five Central American countries, but is unusable by us, because of the short

distances separating Guatemala from the other Central American Republics. We should appreciate an amendment to correspond with the requirements we have submitted.

Band S - 10100 - 11175 kc/s

Page 25. Guatemala has been allocated 10427.5 kc/s ; in such circumstances, this is acceptable.

Page 43. The frequency 10670 kc/s, allocated to Guatemala, is acceptable.

Page 73. We have been offered 11083 kc/s ; this we also accept.

Band U - 11975 - 12330 kc/s

Page 28. Guatemala has been allocated 12222.5 kc/s ; conditions being what they are, this is thoroughly acceptable.

Band V - 13360 - 14000 kc/s

Pages 1 and 34. We accept the frequencies allocated : 13361.75 and 13834.75 kc/s.

Band W - 14350 - 14990 kc/s

Page 10. The frequency 14551 kc/s appears allocated to Guatemala, as well as to El Salvador and Honduras, offering us a range of 1700 kilometers for covering the distance between our transmitter and the receiving station at Miami. Nevertheless, we might conceivably be able to reach an agreement with our neighbours, El Salvador and Honduras, on the joint use of this frequency, since the distances between us are very short.

Page 32. We accept the frequency 14958.25 kc/s, allocated to us exclusively.

Band X - 15450 - 16460 kc/s

Page 8. Guatemala has been allocated channel X-167; this is acceptable.

Band Z - 18030 - 19990 kc/s

Page 40. Guatemala has been allocated 19452 kc/s ; this is acceptable.

The Inspectorate of Telecommunications of Guatemala has found the following discrepancies between the frequency lists sent by the P.F.B., and the frequencies which, according to Article 5 of the Atlantic City Radio Regulations, we have been using so far together with those which, in conformity with those same Regulations, have to be shifted (lists of which are in your possession) (1)

Band G - 4438 - 4650 kc/s

We are requesting : 4455, 4500, 4510, 4520, 4530, 4540, 4550, 4560, 4570, 4580, 4600 kc/s, for the domestic fixed service, and 4635 kc/s for the international fixed service.

Band K - 5060 - 5250 kc/s

We are requesting : 5115 and 5137 kc/s for the fixed domestic service.

Band L - 5250 - 5450 kc/s

We are requesting : 5290, 5375, and 5435 for the fixed service.

Band N - 5730 - 5950 kc/s

(1) These lists were annexed to the letter of 15 June, 1950.

We are requesting : 5745, 5750, 5790, 5800, 5820, 5851, and 5900 kc/s, of which 5800 and 5900 kc/s are for the domestic fixed service ; 5851 kc/s is for the domestic aeronautical service, and the others for the international fixed service. .

Band O - 6765 - 7000 kc/s

We are requesting : 6765, 6770, 6780, 6785, 6790, 6795, 6800 kc/s for the domestic fixed service. 6810 for external, 6820 for internal use. 6840 and 6885 kc/s for external service and 6960 for the domestic fixed service (all fixed services).

Band P - 7300 - 8195 kc/s

We are requesting : 7300, 7320, 7330, 7340, 7350, 7500, 7550 kc/s for the domestic fixed service. 7812.5 for the mobile land service. 7830 and 7872.5 for the fixed service. 8100 for the domestic fixed service. 8155 for the external fixed service. 7425 kc/s for the external fixed service.

Band Q - 9040 - 9500 kc/s

We are requesting : 9350 kc/s for the fixed service. 9300 and 9360 kc/s for the domestic fixed service, and 9130 kc/s for the international fixed service.

Band R - 9770 - 9995 kc/s

We are requesting : 9940 kc/s for the international fixed service.

Band S - 10100 - 11175 kc/s

We are requesting : 10525, 10710, 10847.5 kc/s for the fixed service, and 10910 kc/s for the international fixed service.

Band U - 11975 - 12330 kc/s

We are requesting : 12010, 12115, and 12020 kc/s for the international fixed service.

Band V - 13360 - 14000 kc/s

We are requesting : 13380 and 13390 kc/s for the international fixed service.

Band W - 14350 - 14990 kc/s

We are requesting : 14485, 14575, and 14580 kc/s for the international fixed service.

Band X - 15450 - 16460 kc/s

We are requesting : 16230 kc/s for the external fixed service.

Band F - 4000 - 4063 kc/s

We are requesting : 4020 and 4060 kc/s for the external fixed service.

Band I - 4850 - 4995 kc/s

We are requesting : 4855 and 4860 kc/s for the external fixed service.

It should be noted that in the lists sent the frequencies 5851 and 5990 kc/s appear as allocated to the aeronautical service ; this was an error. They are being used for the Fixed Service, to which they belong.

No. 34.5

21st August 1950.

The PROVISIONAL FREQUENCY BOARD, set up by the International Telecommunication Conference of Atlantic City (1947) invited comments on the frequency lists it had prepared in Geneva for submission to the forthcoming Extraordinary Administrative Radio Conference of The Hague, Netherlands. Accordingly the Department of Radio of Guatemala has informed the above body that it is in complete disagreement with those lists, on the grounds that they IN NO SENSE REPRESENT the requirements submitted by my Administration. In cases where frequencies have been allotted to Guatemala in certain bands, either those frequencies have not been requested, or they cannot be used, for the technical reasons explained in the comments which were duly submitted to the Board.

I have therefore to inform you that:

FIRST: My Administration regrets that it can admit no obligation on its part for expenses incurred by the P.F.B. Not only were the frequencies we wanted not allotted, but also those we have been using for many years, and to which we are entitled as a Member of the I.T.U. Our other requirements have been neglected, for the benefit of other countries and with effects prejudicial to our own.

SECOND: It is true that when GUATEMALA signed the ATLANTIC CITY CONVENTION, 1947, it took upon itself certain obligations, as did the other signatories, but we also reserved to ourselves equal rights as a sovereign state and a Member of the Union. We therefore have a right to equitable treatment, and are not to be regarded merely as a source of funds, as seems to be the case, to judge from the way in which we are expected to pay for activities which were in no sense favourable to our Administration.

THIRD: We do not disown our contributory shares as Member of the ITU, nor do we disown those extraordinary expenses which may with justice be imputed to us, but we do not acknowledge debts which in our own internal accounting we cannot JUSTIFY. This applies in the case of the P.F.B., which in neglecting our frequency requirements not only omitted to give us our due, but has also taken upon itself to allot channels which are technically unusable unless interference is to be caused to adjacent countries, with all the grave difficulties which would ensue.

I would therefore be glad if you could use your good offices to put matters right, in such a way as to obtain a reasonable relationship between the benefits obtained by Guatemala and the way in which expenses have been apportioned. In making this request I refer to the "Resolution authorizing expenditure of funds of the Union for the functioning of the Provisional Frequency Board", which appears on page 111 of the volume containing the Final Acts of the International Telecommunication and Radio Conferences, Atlantic City, 1947.

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Nº 34.6
C.A. Res. 200

(received 11.12.50)

Your 157/18 dated 18th November Stop This Administration has already sent comments* on preparation new frequency Lists +

Nº 34.7
C.A. Res. (200
(206

10th January, 1951

I have the honour to refer to your air mail circular Nº 10.3/3 which reproduces Resolution Nº 206 of the Administrative Council and refers to Document CA 5/37, Reg. 2.

I refer to paragraphs 1 to 4 headed "Considering" and to the "Resolution".

Paragraph 1. The agenda for the Extraordinary Radio Conference to be held on August 16, 1951, states that there will be discussions to approve the "new frequency List" in the part of the Atlantic City table below 4 Mc/s. Our Administration feels that it would be both advisable and legitimate if the Administrative Council forthwith appointed an administration of Region 2 to effect a general coordination of the frequency lists for the bands below 4 000 kc/s and to facilitate bilateral or multi-lateral negotiations on any interference between neighbouring countries. However, in such cases reasonable solutions should be found, for instance by a reduction of power bearing in mind the need for a satisfactory internal service when there is frequency sharing. In this manner, we would avoid bringing to the Conference problems whose solution would delay the debates. A long conference would be a heavy burden for our countries, which are very far away from Geneva. Our Administration recommends that such coordination be carried out by the "Oficina Inter-Americana de Radio" (Inter-American Radio Office) in Cuba or by the Argentine Administration which made such an important technical contribution to the conferences at Mexico City and Washington.

Paragraph 2. We do not fully agree that the new lists should be based on the draft lists of the P.F.B. On examining the "tentative" assignment plans sent to us by the Board, we note that they do not satisfy even 2% of the requirements of my country and

* Published under Nºs 34.1 to 34.5

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we do not think that such a conference could be successful without previous reconsideration of these draft lists.

Paragraph 3. Here we confirm what we said in our comments on Paragraph 1. It is preferable to have a prior general coordination so that Region 2, like Regions 1 and 3, can present lists ready for inclusion in the general assignments without further discussion.

Paragraph 4. On this point we confirm our comments on Paragraphs 1 and 3 and repeat that the efforts made at coordination so far have suffered from reports of interference, without any agreement being reached.
In coordinating the use of such frequencies with neighbouring countries, we have reported the cases of frequency sharing liable to interference but we do not know what measures may have been taken. We suppose that the question of this harmful interference will be brought up at the Extraordinary Conference and that should be avoided as far as possible.

Resolution We are certain that our Administration's lists were duly sent to the P.F.B. and were collated with those of 5 neighbouring countries; they have already been received and coordinated with those of other countries in Region 2. It was of course the P.F.B.'s duty to report on possible interference in order to prevent the failure of conferences and conventions, which serve no purpose if anarchy continues to reign in the spectrum with the consent of the Office whose task it is to avoid it. Similarly it is the Board's duty to note down and to register the frequencies and to issue the lists, but in the 15th Edition of the Frequency List, for instance, we see that a frequency is registered by various neighbouring countries without any objection being made. We hope that the new I.F.R.B. will remedy this situation.

We would be grateful if you would provide us with a final copy of the agenda of the Extraordinary Radio Conference so that we may study it thoroughly.

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HAITI

(REPUBLIC OF)

N° 35.1

13 May, 1950

Comments on : D, E and F

We have the honour to send you some comments accompanying a revised list of requirements submitted by the National Radio Service. These comments concern frequencies assigned to the Haitian fixed service by the Provisional Frequency Board.

It is our hope that these comments will be taken into account by the Extraordinary Administrative Radio Conference which is to begin in The Hague in September next.

COMMENTS BY THE RADIO SERVICE

OF THE REPUBLIC OF HAITI

With reference to the frequency assignments proposed by the various working groups of the Provisional Frequency Board, and outlined in the annexes and reports dated 15-31 March, 1950, the Administration of Haiti wishes to make the following comments :

Haiti is not at present operating any station in the band 14-150 kc/s, nor it does contemplate doing so.

Haiti's requirements for frequencies in band E were not agreed to by the P.F.B., which apportioned frequencies with a separation of 10 kc/s. We now submit a requirement for a frequency of 3960 kc/s; this involves no risk of interference for Venezuela.

It will still be possible to use the frequency 4570 kc/s, in the band G, separated by 1.5 kc/s from the adjacent frequencies assigned, for A1 emissions, and use of 4600 kc/s will not involve any interference with the Hawaiian station to which that frequency has been assigned.

The use of the frequencies 4962 kc/s and 4967 kc/s in band I, employed in the domestic service with a low power, could not possibly jeopardize reception in Vancouver, Peru and Chile.

It has been agreed that we should use the frequency 5425 kc/s for the aeronautical service. However, we do not object to changing this frequency in favour of another in band L.

The Administration of Haiti has repeated its requirements in the bands N, O and P, whilst reducing them to a minimum, in view of the extent of the international or domestic services operated by their use.

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We are also requesting the frequencies 9815 kc/s (band R), 12315 kc/s (band V) and 16040 kc/s (band X), which complete the series of frequencies required by the West Indies Telephone Company and RCA Communications, Inc., established in Haiti and by the National Radio Service.

Note : The requirements of amendments contained in the list annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 35.2

21 June, 1950

We have the honour to send you a list of the frequencies at present being used by Haiti, in the bands between 15 and 6000 kc/s. We should be grateful if you would kindly add this list to the other documents of the Republic of Haiti which are to be submitted to the Extraordinary Administrative Radio Conference.

Note : The list annexed to the previous letter has been classified in a set of files which are at the disposal of the Extraordinary Administrative Conference.

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No. 35.3
C.A. Res. 200

24 November, 1950.

Reference telegram 157/18: Administration of Haiti will forward within the date fixed a development of its operations on assigned frequencies to Haiti but has no general comments on plans assignments P.F.B. +

No. 35.4
C.A. Res. 200

4 December, 1950.

Comments on: E, F and I

We have the honour to send herewith the comments which the Department of Telegraphs, Telephones and Radio has to make on frequencies assigned to the Republic of Haiti by the Provisional Frequency Board.

On the basis of the assignment plan prepared by the Provisional Frequency Board, sent to us in the reports and annexes of March 1950, we have drawn up the following table of frequencies allocated to Haiti:

<u>Bands</u>	<u>Frequencies</u>	<u>Bands</u>	<u>Frequencies</u>
F	(4 013.5 (4 035.5	Q	(9 211.25 (9 269.75
G	4 590.5	R	9 892.87
H	4 775	T	
I	4 948.5	U	12 229.5
L	5 250 - 5 450	W	14 506
N	5 730 - 5 950	Z	19 583

The various services in Haiti which cater for international traffic claim only such frequencies as will guarantee them reliable communications at all times of day and throughout the year.

Thus the RCA Communications, Incorporated, require:

1 frequency in the band G	(4 460 kc/s)
1 frequency in the band P	(8 020 kc/s)
1 frequency in the band X	(16 040 kc/s)
1 frequency in the band T	(11 540 kc/s)

The West Indies Telephone Company requires:

1 frequency in the band P	(7 570 kc/s)
1 frequency in the band U	(12 295 kc/s)
1 frequency in the band W	(14 940 kc/s)

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The International Telegraph, Telephone and Radio Service requires:

1 frequency in the band E (3 987 kc/s)
 1 frequency in the band F (4 005 kc/s)
 1 frequency in the band P (8 010 kc/s)
 1 frequency in the band U (12 295 kc/s)

The Haitian Army requires for its external service:

2 frequencies in the band F (4 000 and 4 050 kc/s)
 1 frequency in the band G (4 500 kc/s)
 1 frequency in the band R (9 815 kc/s)

The Aeronautical Service, for its point-to-point service with Miami, Kingston, Camaguey, Ciudad Trujillo, San Juan P.R. and Curacao, requires:

1 frequency in the band G (4 570 kc/s)
 1 frequency in the band J (5 040 kc/s)
 1 frequency in the band K (5 122.5 kc/s)
 1 frequency in the band L (5 425 kc/s)
 1 frequency in the band P (7 795 kc/s)
 2 frequencies in the band Q (9 110 and 9 270 kc/s)
 1 frequency in the band U (11 980 kc/s).

It will be readily seen that the total number of requirements for the international service exceeds the number of assignments made by the Provisional Frequency Board to the Republic of Haiti. We believe, nevertheless, that the Haitian Administration would be satisfied with the following arrangement:

RCA Communications would receive one frequency in each of the bands G, Q, T and Z.

The West Indies Telephone, 1 frequency in each of the bands Q, U, and W.

The Radio Service, 1 frequency in each of the bands F, R and U.

The Haitian Army, 1 frequency in the bands G, H, N.

The Aeronautical Service, 1 frequency in the bands F, I, L, N, Q or T.

From this it will be seen that to meet all Haiti's requirements for the international radiotelegraph service, one extra frequency is necessary in the bands G, N, U, Q and T.

Since the bands E to O are those on which the heaviest demands are made by the internal radio service and by the medium-distance external service (as is the case for quite a few countries in Region 2) it would seem that apart from P.F.B.'s assignments, we should be able to find the frequencies required to ensure a reasonable service without risk of harmful interference, by exchanging lists of stations used or planned in Region 2 (in accordance with Resolution No.1 of the Administrative Radio Conference

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for Region 2, Washington, D.C.), and by dint of attempts at "consolidation".

This view seems to have been that of the Administrative Council (Resolution No. 206 - Document PV CA5/37).

Thus the Telegraph and Telephone Department could use the whole series of frequencies in the bands N and O designed for trunk traffic with powers of less than 100 watts.

The Haitian Army could also provide its own means of communication within the same power limits.

As regards the aeronautical mobile service, we think that the final documents of regional conferences, such as that of Havana (February 1950) organized under the auspices of the International Civil Aviation Organization, should be used to draw up a final frequency assignment plan for Region 2.

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HUNGARIAN PEOPLE'S REPUBLIC

N° 37.1

30 June, 1950

Comments on : D, E and the whole of the draft list

Reference your circular letters 20/45 of 16 March and 20/59 of 6 April and your telegram 92/2 of 12 June. Stop The Hungarian Delegation representing the Hungarian People's Republic as National Member of the P.F.B. has repeatedly expressed in the plenary assemblies of the P.F.B. its disagreement with the methods of work and the so-called technical principles during its work. Stop The Hungarian Administration must emphasize that its attitude to the work of the P.F.B. has not changed and consequently it considers that the drafts of the new international frequency list prepared by the P.F.B. on the basis of these methods and principles are unacceptable +

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No.37.2
C.A.Res.200

24 January 1951
(published in Notification N° 617)

Comments on: the whole of the draft list.

With reference to your letter 9.6/764 of 14 October, and your circular telegram 157/18, of 18 November 1950, the Administration of the Hungarian People's Republic wishes to state that after a careful and objective examination of the work accomplished by the Provisional Frequency Board, the Administrative Radio Conference for Region 1, and the International Administrative Aeronautical Radio Conference, its attitude remains unchanged. Stop

1. The workings of the P.F.B., and the way that body was run, have demonstrated beyond all manner of doubt that the so-called technical principles adopted by the Board, and its working methods, were not conducive to the elaboration of an equitable frequency assignment plan such as would meet the actual requirements of all Members of the Union and hence lay the foundations for a new International Frequency List that would be generally acceptable. Stop The Hungarian Delegation repeatedly urged at meetings of the Board that only the 1939 Berne List could serve as a basis for the new Frequency List. Stop

2. The draft frequency assignment plan prepared by the Region 1 Conference did not take into account all the requirements presented by the countries concerned and did not correspond to the interests of all national administrations. Stop The assignments made were not based on any technical principle such as might give the countries in question effective protection against harmful interference, made no provision for the future development of national services, and overlooked dates of notification and priority rights - a state of affairs which constitutes a breach of the Atlantic City Resolution relative to the preparation of the new Frequency List. Stop

3. Nor did the draft plan prepared by the International Administrative Aeronautical Radio Conference make provision for the actual frequency requirements of administrations as expressed by them. Stop It catered chiefly for the so-called Major World Air Routes, allotting to them most of the frequencies available, to the detriment of regional and national services. Stop This was done in the interests of a certain group of countries, and was entirely unjust and irregular. Stop

Lastly, all these frequency assignments, designed for incorporation in the new Frequency List, correspond primarily to the interests of the United States of America, Gt. Britain and France: Hence the Hungarian Administration is obliged to repeat what it has already said, i.e., that in the absence of the new International Frequency List, there is no justification for maintaining the I.F.R.B., and that only the Ordinary Radio Conference is fully competent to solve all these problems of frequency assignment. Stop

I should be grateful if you would bring the above to the notice of all Members of the Union by publishing it in the next Notification.

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INDIA

N° 38.1

30th May, 1950

Comments on : C, D, E and F

1. I am directed to say that the Indian Administration has examined the draft frequency lists prepared by the various groups of the P.F.B. and considers that :

- (a) the assignments made to India are inadequate to meet effectively the needs of even the existing circuits;
- (b) there is no provision for projected additional circuits which, for India, are very essential;
- (c) draft frequency assignments in certain vital bands have not been prepared, thus making it impossible to form a correct and complete picture;
- (d) of the assignments made to India, a large number is unworkable on technical grounds;
- (e) in consequence of the non-inclusion of certain stations, as reported to be in operation by certain countries neighbouring India, who are large users of the radio spectrum, and of the revision to these countries' requirements having been made without their knowledge, the workability of the draft plan is doubtful.

2. For these reasons, India finds herself unable to accept the draft plan as it stands. Further action to be taken in the Hague Conference is under consideration.

N° 38.2

12th July, 1950

Comments on : A, B, G and J

Reference your cable N° 92/2 dated 13th June 1950 on the above subject.

Comments on the draft frequency assignment plans of the P.F.B. have already been forwarded to you, vide our letter dated 30th May, 1950.

The assignments made to India by the Aeronautical Administrative Conference are under examination.

No comments can be given on the assignment plans of the High Frequency Broadcasting Conference as they are not yet available.

The assignment plan produced by the Region 3 Conference, Geneva, 1949, has been examined by this Administration. Assignments made to India below 1 605 kc/s are fairly satisfactory, and the plan prepared is acceptable, presuming that there will be no interference from other I.T.U. Regions. Assignments made to India above 1 605 kc/s are generally not satisfactory.

No. 38.3
C.A. Res. 200

2 January, 1951.

Comments on: A, B, C, E, F and J

In continuation of this office cablegram No. IDWB-145/50, dated the 29th November 1950, regarding the preparation for Conference, I have the honour to forward herewith the additional comments of the Indian Administration on the examination of the draft plans forwarded by the Provisional Frequency Board and the assignment plans of the other conferences in amplification of those already sent.

2. As already pointed out, the draft plans forwarded did not give the complete picture of the assignment for all the circuits applied for by the Indian Administration as, in a number of bands, no "contained" plans are available. Nor is any finalised comments possible on the extended channeling plans or block assignments.

3. In the absence of the complete plans for all the bands between 10 kc/s and 27.5 Mc/s, it will not be possible to give any assessment of the workability or otherwise of the frequencies proposed to be assigned to India. But in compliance with Resolution No. 200 of the Administrative Council, comments of this Administration on the "contained" plans are attached (in duplicate).

4. Detailed comments will follow.

P.F.B. DRAFT PLANS

- NOTE:
1. Reduction in the number of channels proposed to be assigned as against our engineered requirements is unacceptable.
 2. Of the assigned channels, those classed as unsatisfactory are due to their liability to co-channel or adjacent channel interference.

Band	No. of channels engineered		No. of channels proposed to be assigned		REMARKS
	A1 A2	A3 & A3b3	A1 A2	A3 & A3b3	
1	2	3	4	5	6
D	3	3	-	2	No A1A2 channels have been assigned. Of the 2 A3 channels assigned both are unsatisfactory.
E	-	3	-	-	No plan.
F	19	19	11	5	5 A1 and 3 A3 channels unsatisfactory.

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1	2	3	4	5	6
G	25	90	11	9	All requirements of India have not been contained in this plan. A statement has already been made by India in the P.F.B. regarding this.
H	1	24	9	4	In these bands, against 13 channels asked for Tropical Broadcasting, only 10 have been assigned. Even of these 9 are unsatisfactory.
I	-	45	18	8	
J	-	6	4	3	
					Consequent on the assignments to Tropical Broadcasting not being final no comments can be given on the assignments to the other Services, as Tropical Broadcasting has priority in these bands.
K	20	48	-	-	No plan.
L	13	42	-	-	No plan.
M	3	-	-	-	No plan.
N	26	62	-	-	No plan.
O	44	46 + 2	-	-	No assignment plan. Only a block assignment plan is available and no comments are possible on it.
P	72	87	-	-	
Q	55	63 + 3	47	13 + 1	12 A1, 6 A3 and 1 A3b3 channels are unsatisfactory.
R	16	29	15	3	5 A1 channels are unsatisfactory.
S	27	58	34	24	2 A1 and 8 A3 channels are unsatisfactory.
T	20	28	15	9	Only channelling plan available and in this 7 A1 and 7 A3 channels are unsatisfactory. This comment is subject to the structure of this plan not changing.
U	23	15	16	5	6 A1 and 1 A3 channels are unsatisfactory.

1	2	3	4	5	6
V	19	8 + 3	15	3 + 3	7 A1. 1 A3 and 3 A3b3 channels are unsatisfactory.
W	13	25	29	5	4 A1 and 2 A3 channels are unsatisfactory.
X	26	40 + 2	50	18 + 2	Only channelling plan and in this 19 A1, 9 A3 and 2 A3b3 channels are unsatisfactory. Comment subject to the structure of this plan not changing.
Y	11	9 + 1	11	1	
Z	10	5	20	3 + 1	12 A1, 1 A3 and 1 A3b3 channels are unsatisfactory.
aa	14	7 + 3	12	6	
bb	-	2	-	-	
cc	8	6	10	-	
dd	1	-	8	2	
ee	-	-	3	2	
ff	-	1	1	-	

REGION 3 CONFERENCE ASSIGNMENT PLANS

Bands
kc/s

1. 150 - 1 605
 - (i) Generally satisfactory (except the assignments in the Broadcasting bands) subject to minor modifications.
 - (ii) Regarding the Broadcasting bands (535 - 1 605 kc/s) 8 assignments have a very poor protection ratio of the order of 25 dbs which should be raised to at least 40 dbs. In 19 other cases, the location requires slight changes. A statement of those is attached as Appendix I; these do not affect the assignments made to the other countries.

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2. 1 605 - 3 900 (i) Against 1216 channels that are proposed to be assigned to India, only
- 324 - A1 and
18 - A3
- channels are fairly satisfactory.
- (ii) The assignments proposed for A3 in most cases do not permit working that emission.
- (iii) Regarding Tropical Broadcasting in the bands 2.3 - 2.5 Mc/s, 5 channels have very poor protection ratio.
- (iv) In the Tropical Broadcasting band 3.2 - 3.4 Mc/s, only 11 channels have been assigned against the requirement of 13 channels and all the 11 channels are unsatisfactory.

AERONAUTICAL CONFERENCE ASSIGNMENT PLANS

1. OR - The OR assignment plan is satisfactory and is acceptable to India.
2. R - The R assignment plan is fairly satisfactory.

MARITIME MOBILE PLAN

1. Only one set of frequencies in the 4, 8, 13, 17 and 22 Mc/s is assigned in the telephony bands.
The plan is not satisfactory to India as the assignments in it are inadequate for the essential minimum needs.

Note: Appendix 1 to the previous letter has been classified in a file which is at the disposal of the Extraordinary Administrative Conference.

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INDONESIA (Republic of the United States of)

No 39.1

30 June, 1950

Comments on : A, B, C, E, F and J.

I have the honour to submit herewith, the comments of my Administration on the final results of the Provisional Frequency Board.

In this respect I would draw your attention to my telegram of May the 27th 1950, No 4530/RTT, in which the main points of our comment have been transmitted to the General-Secretariat of the International Telecommunication Union.

The attached document could not be prepared within the time limit set forward by the Administrative Council in its resolution 154, paragraph 7, because the P.F.B. documents concerned did not arrive before May the 15th, 1950.

This document contains four consecutive pages numbered 4-1, 4-2, 4-3, and 4-4.

It would be greatly appreciated if you could acknowledge the receipt of this document.

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Comments of the Administration of the Republic of the United States of Indonesia on the Draft Frequency Lists as prepared by the Provisional Frequency Board.

1.1. In submitting this document, the Indonesian Administration draws the attention to the previous submitted telegram dated 27 May 1950, No 4530/RTT.

1.2. As the P.F.B. documents concerned were received only the 15th of May, 1950, the available period between the said date and the limit as set forward by the Administrative Council in its Resolution 154 paragraph 7, for submission of remarks and suggestions on the Draft Frequency Lists as prepared by the P.F.B. being totally insufficient for a careful study, the Indonesian Administration was unable to produce this document before the ultimate date of June the first 1950.

1.3. In view of the fact, that the documents concerned were only received 15th of May 1950, there was no opportunity to study the co-channel and adjacent-channel sharing, this in respect of the transmitting as well as the receiving frequencies.

1.4. The Indonesian Administration wishes to submit hereunder the following remarks and suggestions on the draft frequency Lists, mainly in respect of the proposed bandwidth.

2.1. General.

It appears from the documents that in many instances an extra consolidation has been applied to the requirements of Indonesia by the P.F.B. working groups concerned. This extra consolidation is totally unacceptable, as the frequency requirements under consideration, have been consolidated to the lowest possible minimum number of frequencies necessary for a satisfactory operation of the essential services. In relation hereto it might be of some value to point out, that the territory of Indonesia consists of 5 large and hundreds of small islands among which the only possible means of communication is exclusively to be maintained by radio circuits.

2.2. It is felt here that, although the number of frequency requirements is vastly exceeding the available MF/HF frequency spectrum, an attempt for improving the general situation can be made, by leaving out of consideration the great number of requirements for very low power service which, in general, are unable to cause harmful interference during daytime operations outside the territory of the Administrations.

This Administration fails to see the necessity for coordination on international basis of circuits using frequencies up to 7 Mc/s, with a maximum transmitting power of one hundred watts and covering distances of less than 200 km., between the points of transmission and reception.

In this respect the Indonesian Administration proposes that the members states be invited to withdraw their frequency requirements to be operated within the aforesaid limits.

It is sincerely hoped that other administrations are in a position to agree to this point of view, and that they are able to withdraw these circuits from their frequency requirements. The operations of the majority of this kind of circuits could be dealt with, by the Administration concerned and in case of harmful interference by mutual agreement between the administrations involved.

The frequencies thus being put into use would have to be notified to the General Secretariat of the I.T.U. and to be included in the International Frequency List in the notification column (non-interference basis).

3.1. A further saving of frequencies could be reached, when the participating administrations are prepared to accept the fact, that the majority of long distance radio-circuits have no real need for a 4 to 5 frequency complement. The practical experience has shown, very clearly, that only very few of these circuits do use more than 3 frequencies to cover the 24 hours of service per day.

Frequency complements composed of more than 3 frequencies for one circuit should only be registered in very exceptional cases.

4.1. Remarks in detail.

The frequency requirement plan as produced by the Region 3 Administrative Radio Conference, Geneva, 1949, is acceptable for the Indonesian Administration.

4.2.-15.1. Fixed Service Bands : (detailed comments on : Bands D, G, HIJ, KLMN, O, P, Q, R, S, T, UVW, X, Y, Z, aa, bb, cc, dd, ee, ff)
.....

15.2. Aeronautical R and OR band frequencies :

Regarding the OR frequency plan as has been drawn up by the International Administrative Aeronautical Radio Conferences, Geneva 1948 and 1949, the Indonesian Administration declares that this plan is acceptable.

15.3. With respect to the R frequency plan, the Indonesian Administration wishes to point out that, a frequency assignment plan has been worked out for the S.E.A. Region during a conference in Delhi, India, from April 17th-May 13th 1950, held under auspices of the I.C.A.O. This frequency assignment plan is acceptable for the Indonesian Administration.

16.2. Maritime Mobile bands.

The frequency assignment plans as have been drawn up for the maritime mobile service are unacceptable for this Administration, as too much sharing has been applied. Furthermore, at least two more 13 Mc/s frequencies are necessary to cover the proposed service ranges of our various coast stations.

17.1. H.F. Broadcast frequency assignment plan.

As the final report of the second session of the H.F. Broadcasting Conference in Florence is not yet available, the Indonesian Administration reserves the right to submit its comments on this subject at a later date.

18.1. Proposal regarding the international aeronautical fixed requirements.

The Indonesian Administration wishes to draw the attention to the following items :

- A.- There is an increasing demand for aeronautical fixed radio telecommunication circuits throughout the world.
- B.- To some extent, plans for coordination of the required circuits have been made under supervision of the International Civil Aviation Organization.
- C.- In November 1949 a special working group of the P.F.B. produced a plan based on the submitted aeronautical circuit and frequency requirements (see P.F.B. doc. 688).
- D.- A further decrease in the number of frequencies could be attained by a careful study of the possibilities of a coordinated world wide communication system for this purpose.

This Administration therefore would propose :

- A.- To convene a meeting of Delegates of the States concerned at the same time and place as the forthcoming Extraordinary Administrative Radio Conference, under jurisdiction of the I.C.A.O.
- B.- That this Meeting study the possibilities of a world wide plan for the aeronautical fixed telecommunication service, bearing in mind the very severe shortage of suitable HF frequencies available for the fixed services.
- C.- The final results of this Meeting to form a basis of further discussion in the Extraordinary Administrative Radio Conference with a view to the ultimate allotment of the necessary suitable frequencies.
- D.- To include these final results in the new Frequency List in the registration column.

Note : The detailed remarks and comments contained in the paragraphs 4.2. to 15.1. included, of the preceding letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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Nº 39.2
C.A. Res. 200

received 30th November 1950

Reference 157/18 Stop Refer to our letter dated 30th June, 1950⁺ containing our comments in full on final results of P.F.B. Stop Refer also to your acknowledgment of 18th July 1950 Nº 13/121 Stop This Administration has no further comments to submit. +

* Published under Nº 39.1

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IRAQ

N° 41.1

17 May, 1950

Comments on : F.

With reference to your circular letters N° 20/72 and 20/73 dated 28.4.50 and 1.5.50 respectively, I have the honour to inform you that no alterations are required to be made to the frequencies already requested.

N° 41.2

15 June, 1950

Comments on : the whole of the draft list.

Your telegram N° 92/2 Stop No alterations to P.F.B. draft lists are required +

Nº 41.3
C.A. Res. 200

21st December 1950

Comments on : E and F

In reply to your telegram Nº 157/18 and to Resolution Nº 200 referred to therein, I am forwarding a List of frequencies in the band 4 000 kc/s to 27 000 kc/s which are required to enable the extensive system of radio services now being developed in Iraq to be put into operation.

Most of these frequencies were applied for or confirmed in the "Consolidated List of frequencies" sent to the Chairman, P.F.B., under cover of my letter of 3rd August 1949 Nº 60/66/26030, a copy of which is attached.

This was sent to you in reply to your circular letter Nº 60/86/60 dated 27th May 1949 asking for the submission of a list of frequencies required.

From the P.F.B. Booklet Nº 1 just received, it would appear that these frequencies have not been recorded as having been applied for by Iraq.

Copy of a letter Nº 60/66/26030 dated 3rd August 1949, from Director General of Posts and Telegraphs, Iraq, to the Chairman, P.F.B., Geneva, Switzerland.

With reference to the circular letter Nº 60/86/60 dated 27th May 1949, I have the following comments to make :

Consolidation :

The subject has been thoroughly studied and it is regretted that further consolidation other than that shown in the attached list is not possible.

The circuit requirements submitted are the minimum necessary for our immediate requirements.

General :

This Department is committed to a very comprehensive expansion of its telegraphy, telephony, coastal, broadcasting and aeronautical radio services to the extent of well over £. 150,000 all the equipment is either on order or already in the country and erection is in progress.

Furthermore, the Iraq Petroleum Company, the Basrah Petroleum Company and the Mosul Petroleum Company are in progress of expansion of their radio services. The Middle East Pipelines Co. Ltd., are already committed to a very extensive radio network.

All our requirements for these various services have already been submitted and I presume will receive consideration in due course, as none of these have been shown on the frequency complement attached to the above mentioned letter.

Please find attached list showing selected frequencies for our circuit as requested.

Note : The list annexed to the letter dated 21st of December, 1950, has been classified in a file which is at the disposal of the Extraordinary Administrative Conference.

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IRELAND

N° 42.1

1st June 1950

Comments on : E, F and H.

I am directed by the Minister for Posts and Telegraphs to acknowledge receipt of Circular letters N° 20/59 of the 6th April 1950 and N° 20/72 of the 28th April 1950 and enclosures and forward as requested a schedule giving

- a) the requirements of this Administration as submitted to the Atlantic City Conference.
- b) the frequencies assigned by the Provisional Frequency Board in bands Q, R, S, U, Z and Aero-bb corresponding to the requirements submitted.
- c) the frequency requirements which have been included in the channel assignments in the uncompleted bands G, P, T, and X.
- d) the frequency requirements which have been included in the list of requirements in bands K, L, M, N and O.
- e) the frequencies assigned by the Region 1 Conference.
- f) the outstanding frequency requirements which do not appear to have been included in any list.
- g) observations on the respective circuit assignments and omissions in the various lists.

In addition to the requirements dealt with in the schedule, there exists a requirement dealt with in recommendation N° 31 of the ICAO European-Mediterranean Aeronautical Fixed Telecommunication Special Meeting, Paris 1949 (Doc. 6952 COM/536, page 58) for a family of frequencies consisting of a single frequency in each of the 4, 6, 8, 11 and 17 Mc/s band with bandwidths adequate to accomodate normal A1 radio-telegraphy. These frequencies are required as a standby for emergencies on a common world-wide basis and if the ICAO recommendation be implemented it is requested that Shannon be one of the stations to which these frequencies are assigned.

Note : The detailed remarks and comments contained in the table annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.



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No. 42.2
C.A. Res. 200

12th December 1950

Comments on: A, B, C, D, E, F and H.

With reference to your circular letter of the 14th October (with Annexes) and your telegram 157/18 of the 18th November, I am directed by the Minister for Posts and Telegraphs to furnish hereunder, for the attention of the I.F.R.B., this Administration's comments on Request No. 1 in the Administrative Council's Resolution No. 200.

Resolution No. 200. Paragraph a).

The Frequency Assignment Plans already prepared for the frequency bands below 4,000 kc/s and the Frequency Assignment Plans prepared for the Maritime Mobile and Aeronautical Mobile Services are generally acceptable, with the exception that this Administration desires an additional frequency in the band 1 605 - 2 850 kc/s for Light House, Light Ship and Life Boat communications.

Resolution No. 200. Paragraph b).

The Draft Frequency Assignment Plans in the Frequency Range between 4,000 and 27,000 kc/s, other than those covered in a) above, are not acceptable. Detailed comments on the Draft Frequency Assignment Plan for this part of the frequency spectrum were forwarded to the Union with this Department's letter of the 1st June, 1950 *. This Administration has no amendments to or amplification of those comments to offer.

* published under No. 42.1

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ICELAND

N° 43.1

10th July, 1950

Comments on : D, E, F and H

This Administration has the honour to communicate to you its provisional remarks to the draft of the New Frequency List as prepared by the Provisional Frequency Board. The draft was not received here until the end of May and it has therefore not been possible to look it through and prepare remarks to it until now.

Note : The detailed remarks and comments contained in the previous letter have been classified in a set of files, each of which referring to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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ITALY

N° 44.1

31st May 1950.

Comments on : C, D, E and F.

In accordance with Resolution N° 154 of the I.T.U. Administrative Council, the Italian Administration has the honour to send you herewith its first general comments, and its first observations on points of detail, in connection with the different draft plans prepared by the P.F.B., and with more particular reference to the frequencies assigned to Italy.

These comments and observations are contained in the following annexes:

- Annex 1 :
- a) First general comments on the various draft plans;
 - b) First general comments on the draft frequency assignment plan for coast stations;
 - c) First general comments on the draft plans for the various bands of the fixed and mobile land services.
- Annex 2 : First observations and queries concerning frequencies assigned to Italian coast stations.
- Annex 3 : First observations and queries concerning assignments made to Italy in the various bands allocated to the fixed and mobile land service.

After a more careful examination of the different plans of the draft, and especially the Region 1 plan, the Italian Administration reserves the right to submit other comments and requests at the next Extraordinary Radiocommunications Conference.

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Annex 1a) First general comments in connection with the various draft plans

With regard to the activities of the P.F.B. and the task of the forthcoming Extraordinary Administrative Radio Conference, the Italian Administration is of the opinion :

- 1) That the technical work that has been done, and the results thereby achieved, have made an extremely valuable contribution to the progress of radio services ;
- 2) That, considering the very considerable difficulties encountered by the P.F.B. in preparing its various assignment plans, the work accomplished is most substantial ;
- 3) That, nevertheless, final completion of the new international frequency list will meet difficulties of the gravest nature ;
- 4) That these difficulties arise :

from the number of requirements, which in general exceed the essential requirements of countries ; this is particularly true of the requirements submitted by countries which have stations and territories scattered throughout the various continents ;

from the fact that frequency complements are in general on a too liberal scale ;

5) That, in consequence, the Extraordinary Administrative Radio Conference will have to make the requisite reductions in the two factors mentioned above ;

6) That if that Conference is to be a success, every country will have to show goodwill.

This holds true more particularly for those countries which occupy a dominant position in the realm of telecommunications and radio.

b) First general comments on the draft frequency assignment plan for coast stations.

In connection with the draft plans for assignment of frequencies to coast stations, the Italian Administration is of the opinion :

- 1) That, considering the grave difficulties encountered by the P.F.B., the solutions reached, even if not absolutely satisfactory, nevertheless constitute a very considerable step forward, and a firm basis on which better and more equitable plans may be evolved.

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2) That in many cases the sharing contemplated is technically inadmissible, when agreements between administrations for time sharing are still not practical politics ;

3) That to obtain an improvement in the plans for the different bands, and to make teletype transmissions possible, it would be desirable for certain countries, which have submitted the greatest volume of requirements and have stations, which might act as relays, scattered throughout the world, to realize the need to reduce their assignments, particularly in the bands around 12 and 16 Mc/s.

c) First general comments on the draft plans for the various bands of the fixed and mobile land services.

1) Coordination of plans in the different bands.

The plans prepared by each working group for the various bands should be coordinated in such a manner as to eliminate the drawback that has been noticed in several cases, i.e., that in sharing and "compression " the various frequencies of the complements were dealt with without due account being taken of what was being done to the other frequencies of the same complement,

The result has been that in several cases the frequencies of a circuit have suffered so severely as to make it impossible for the circuit to work.

The coordination mentioned would enable a new and more equitable assignment of frequencies to be made.

2) Frequency complements

There was a lack of uniformity in the rules applied for the assignment of frequency complements to circuits. These complements should be revised, applying the P.F.B.'s rules strictly.

This would eliminate the remarkable discrepancies at present observable between the treatment accorded to similar circuits, and would lead to the elimination of many frequencies which do not appear to be judiciously used.

3) Correlation

As appears from the reports of certain working groups, the studies undertaken by the P.F.B. with a view to "correlation" led in practice to a volume of requirements which seems unjustifiably large when compared with the actual needs of administrations. Hence it would be highly desirable for the question of "correlation" to be re-examined with the cooperation of the administrations concerned, to obtain a reduction in requirements.

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4) Adjacent channel separation

This must be made uniform for the different bands, and revised.

It is noticeable that in some bands the adjacent channel separation is greater than that obtaining, for the same service, in higher bands.

Note : The detailed remarks and comments contained in Annexes 2 and 3 have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 44.2
C.A. Res. 200

26th January, 1951

Comments on : C, E, F, H

With reference to the Administrative Council Resolution concerning preparations for the Extraordinary Administrative Radio Conference, I have the honour to send you herewith, in Annexes 1 and 2, the comments my Administration has to make on the assignment plans for frequencies below 4 000 kc/s and on those prepared by the P.F.B. for the range 4 000 - 27 500 kc/s.

I am also sending you herewith (Annex 3) a list of amendments to the comments on individual assignments notified on 31 May, 1950*.

I. Comments on the frequency assignment plans for frequencies below 4 000 kc/s

a) General comments :

The Italian Administration is prepared to accept the assignment plans for frequencies below 4 000 kc/s, subject to the amendments indicated in paragraph b), but should those plans be radically revised, we reserve full liberty of action as regards the use of those frequencies. In particular, we reserve the right to demand the assignment of numerous frequencies we are actually using, when those frequencies have not been assigned to us in the above plans.

b) Observations on individual assignments :

.....
(These observations have been classified in a file relating to Region 1, which will be at the disposal of the Extraordinary Administrative Conference).

II. Some further comments on the P.F.B.'s plans (4 000 to 27 500 kc/s)

a) General Comments :

As regards the question of whether the P.F.B.'s plans for the maritime mobile service and fixed services are acceptable or not, we have the following observations to offer :

- i) the maritime mobile service plans are the fruit of much patient labour by the delegates of the countries concerned, and, although they need further substantial amendments, they may be considered as, in general, highly satisfactory;
- ii) As regards the fixed service plans, the P.F.B. has been unable to do as much work on them as on the mobile service plans.
Hence, in their present draft form, they are far from acceptable.

Further, the P.F.B. was unable to discuss the motives for frequency requirements. An assembly which could discuss and perhaps reduce the assignments requested would have a reasonable chance of preparing a new International Frequency List based on technical rules,

* Published under N° 44.1

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as laid down by the Atlantic City Resolution.

In short, we consider the P.F.B.'s plans to be unacceptable, but hold, nevertheless that they constitute a draft such as might be reconsidered and amended with a view to application.

b) Observations on individual assignments :

.....
(These observations have been classified in a file relating to the Maritime Mobile Service, which will be at the disposal of the Extraordinary Administrative Conference).

Note : The information contained in Annex 3 to the previous letter has been filed with the observations and detailed comments of the letter dated 31st May, 1950 (N° 44.1)

LEBANON

N° 45.1

30th May, 1950

Comments on : E

Referring to circular letter N° 20/59 of 6th April 1950 concerning the draft of the new international frequency list prepared by the P.F.B., I have the honour to send you herewith a list of remarks on the frequencies allotted to the transmitters of Khaldé (Lebanon). An explanatory letter from the Société Radio-Orient is attached.

The frequency consolidation table referred to in the letter from the Société Radio-Orient was sent to the Technical Secretary of the Provisional Frequency Board, Geneva, enclosed in our letter N° 28/49-2-T of 24th August 1949.

I should be obliged if you would take note of the observations in the present list, with a view to their consideration by the forthcoming Extraordinary Radio Conference, 1st September, 1950.

AnnexLetter from the Société Radio-Orient

Referring to our letter TEC. 52-976 of 23rd August 1949 concerning the consolidation of the frequencies of the Radio-Orient transmitters and after studying the documents relating to the draft of the new international frequency list prepared by the P.F.B. we have the honour to inform you that the frequencies allotted to our transmitters do not give us satisfaction.

The table of consolidation of our frequencies enclosed in our letter of 23rd August 1949 corresponded to our essential requirements, taking into account not only propagation conditions but also our available transmitting equipment, the volume of traffic over the various circuits, the time limits to be respected and the forking possibilities. It was drawn up as a whole for acceptance as a whole to provide the greatest possible economy in our frequency requirements.

The allocations in the draft frequency list, instead of corresponding to our consolidation table with differences of only a few per cent over the frequencies requested for each circuit, are sometimes substantially different. Thus, for the considerable gap between the top of band V and the bottom of band Z, instead of the 10 frequencies originally envisaged by the P.F.B. (4 in band X, 3 in band Y, and 3 in band Z) we had requested only 4 frequencies : 16 075 kc/s (A1), 16 325 kc/s (A3), 17 375 kc/s (A1), and 18 455 kc/s (A1 and A3). We have been allotted 2, to represent the two extremes, of which one, 16 458.75 kc/s, falls outside band X, and the other, 18 454 kc/s is allotted to a different circuit (A1 circuit 2, instead of A1 and A3 circuits 4, 5 and 8). To make up for this, it is true, we have been allotted

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a frequency 19 920.5 kc/s (A1 and A3) at the top of band Z, as shown in the table below :

<u>Requirement</u>	<u>Circuits</u>	<u>Allotment</u>	<u>Circuits</u>
Band X (16 075 kc/s)	3, 4, 6	Band X (16 548.75 kc/s)	3, 4, 6
Band X (16 325 kc/s)	8	Nothing	
Band Y (17 375 kc/s)	2	Band Z (18 454 kc/s)	2
Band Z (18 455 kc/s)	4, 5, 8	Band Z (19 920.5 kc/s)	4, 5, 8

We lack, however, a frequency in band X, and the equipment in use on circuit 2 does not allow us to use the frequency 18 454 kc/s. Besides, we had requested this latter frequency for circuits 4, 5 and 8.

If it is impossible to respect the consolidation proposed in our letter TEC. 52-976 of 23rd August 1949, with no change other than a slight shift of the frequencies requested for each of the circuits indicated, the consolidation must not be such as to deprive us of frequencies in bands X (16 075 and 16 665 kc/s) and Y (17 160 kc/s) notified many years ago. Hence the assignment finally made should include, besides the frequencies allotted in the new draft list, at least 2 additional frequencies, 1 in band X, the other in band Y, as shown in the tables annexed, which sum up our observations.

Note : The detailed remarks and comments contained in the tables annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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No. 45.2
C.A. Res. 200

12 December, 1950.

Reference 157/18 of 18th November Stop Kindly refer our information given Technical Secretary of P.F.B. in Geneva on 22nd August, 24th August and 12th September 1949 as well as to contents our letter despatched later to I.T.U. General Secretariat on 30th May 1950 * which we hereby confirm again +

* Published under No. 45.1

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NICARAGUA

Nº 50.1
C.A. Res. 200

received 24th November 1950

Reference telegram 157/18 Stop Nicaragua does not propose to
formulate any new commentaries +

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NORWAY

Nº 51.1

31 May, 1950

The Norwegian Administration would like to inform you that its observations regarding the draft of the new international frequency list, submitted according to your circular letter Nº 20/59 of April, 6th, will follow within a few days.

Nº 51.2

17 June, 1950

Your service 92/2 Stop The dispatch of comments and proposals will unfortunately still be somewhat delayed +

No 51.3
C.A. Rés. 200

11 December, 1950

Comments on : C

With reference to your communication No 9.6/764 of October 14, Annex 15, para. 6.a, we beg to send you herewith, in duplicate, the comments by the Norwegian Administration on the frequency plans for the Maritime Mobile service, radiotelegraph and radiotelephone.

Other comments will follow in the next day or two.

I - Draft of frequency assignments to coast telegraph stations between 4 and 23 Mc/s (reference P.F.B. Doc. 591)

The Norwegian Administration finds that certain principles used for the preparation of this plan have been applied with too small caution, without due regard to other important aspects.

One important objection in this connection relates to the assignment to Bergen Radio in the 8 Mc/s band.

The proposed primary channel for this station, 8 678 kc/s, is on the junction between high power and low power transmitters in this band. The principle here referred to is found in Doc. 591, page 6, para. 2.1, section 5. We can not agree to this assignment for the following reasons :

This part of the 8 Mc/s band is shared by the Maritime Mobile service and the Fixed service in certain regions on equality of right. We are of the opinion that it is impossible to share this frequency with the other service on this basis. The 11 Mc/s band has until now been heavily exploited by Bergen Radio, perhaps with less interference than in the other bands, due to this band not being used by all the other countries. When this band must be abandoned, the 8 Mc/s band which probably already is the most important frequency band, must be the more important for the future exchange of the high traffic volume of this station.

In this connection we must also object to the principle of protected service range of 6 000 km being applied here, (see Doc. 591, page 8, para. 3.3). The 8 Mc/s band must be used during night time on longer distances, also to the Far East, where the sharing with the Fixed service would dangerously complicate the communications of both services. We must necessarily use directive aerials, but on east-west and west-east propagation paths the auroral absorption must cause certain drawbacks for our maritime service as regards interference. Another important aspect is that, in general, the propagation conditions for this station on approximately 60° N show somewhat lower MUF values than for stations on lower latitudes. It should be remembered that a high volume of traffic in this case is centralized to one single station, whereas in many other cases, from the standpoint of frequency utilization, a less economical arrangement with two or more stations is used. All these points seen together, mean that sufficient consideration must be taken to protect the service of this station.

The unsatisfactory assignment of 8 678 kc/s for Bergen Radio is in our opinion due to incorrect application of assignment rules, and must be corrected. A satisfactory solution of this problem is in our opinion the interchange of stations on the two channels 8 678 and 8 542 or a similar change of the plan.

For the same reasons as mentioned above we find it necessary to point out that the sharing with Waiouru, New Zealand, on the same channel is far from satisfactory, if Waiouru uses the 8 Mc/s band fairly continuously.

In the interest of obtaining a frequency plan where the equality of assignments, the consideration of established services and the possible sacrifices have been duly balanced, we would like further to make the following remarks:

4 Mc/s The Bergen Radio channels (4 325 and 4 301) are heavily loaded compared to some other assignments in this band. It is difficult to ascertain how far this is acceptable. We must, in any case, count on restricted ranges for these frequencies due to auroral absorption. The necessity of being able to use higher frequencies with superior protection is obvious. It is on the other hand possible that increase of power above 5 kW may be necessary on some bands, or all bands.

6 Mc/s The comparatively heavy sharing on the primary channel 6 467 (Simonstown, Bombay, Chittagong in addition to Panama and Choshi) means a sacrifice on our part as regards the usefulness of this frequency. If such loading must in general be effected, Bergen can not take more than its due part, matters also considered in the light of what has been said in other sections of this comment.

The frequency mentioned would be the main working frequency. We have no special comment on the secondary channel 6 432, except that some of the stations shared with on 6 467 could preferably be transferred to 6 432, or to another frequency.

8 Mc/s The Norwegian Administration considers that its station, Bergen Radio, must have at its disposal 3 frequencies in this band, for the reason already mentioned above on the abandonment of the 11 Mc/s band. The station must at certain times be able to work continuously on two of these frequencies. We would like to suggest the frequency 8 590 kc/s as a possible alternative for this additional channel. The proposed secondary frequency of 8 574 kc/s is too heavily loaded, both as a supplementary frequency during heavy traffic, and as a replacement frequency during possible interference.

The objections to the assignment of 8 678 kc/s have already been dealt with above, and are in our opinion far too important to justify our acceptance of the plan.

12 Mc/s An objection in this case is that the frequency 12 727.5 kc/s is very near the frequency band for cargo vessels, and that therefore duplex working may prove too difficult on this frequency. Otherwise the 12 Mc/s assignments to Bergen Radio are, as far as we can judge at the moment, acceptable to the Norwegian Administration.

17 Mc/s The 17 Mc/s assignments are also considered acceptable. This band will be heavily used in the winterseason and both channels must then at times be continuously available for our station.

22 Mc/s The sharing on the primary channel 22 425 is perhaps acceptable, provided the use of this frequency by Hillsboro is not too important at times when this band is utilized by Bergen Radio.

Duplex working may prove too difficult also on this channel. We may have to return to this subject later.

During the winter months it may be necessary to use both channels in this band regularly. The loading of the secondary channel 22 491 is too heavy for this contingency. We suggest that an acceptable alternative here might be to interchange the station Bergen Radio on 22 491 with Portishead on one of the channels 22 545, 22 503 or perhaps 22 431.

The Norwegian Administration has no particular comments on the following low power channels, 6 519.5 - 8 686 - 13 101 - 17 165.6 - 22 647 kc/s.

The sharing on the frequency 4 346 kc/s is however considered unsatisfactory, because the United Kingdom station DKXX 4 would interfere with communications on this frequency. A transfer, either of HJXX 1 or DKXX 4 should therefore be made to another frequency.

With regard to these low power channels for stations HJXX 1 it will be necessary to make use of the provision that mobile stations may utilize the same frequencies as the coast stations (Radio Regulations of Atlantic City, Art. 7, para. 4, No 238).

II - Draft of frequency list for radiotelephone coast stations (reference P.F.B. Doc. of 16/1.50, revised Doc. 602)

In general the Norwegian Administration must conclude that the requirements for frequency space for this service have not been and, indeed, can not be satisfied on the basis of the present frequency allocation. An immediate consequence is that a free growth of telephone communication in this service can not be counted upon.

This question, which is a rather difficult one, also embraces the problem of both the present and the future requirements and how far these are, or will be presented in a properly reduced form. A point in this connection is the number of requirements which have been accommodated under one frequency for each country sharing this frequency. The Norwegian Administration does not think that the right of use of this frequency should be set according to the number of assignments or stations on that frequency as shown in the plan.

Certain principles regarding sharing schedules might therefore have to be considered by the conference instead of leaving it entirely to the individual administrations concerned.

In view of the increasing demand for radiotelephone facilities in

the Norwegian maritime mobile service, the proposed frequency plan presents grave problems for the Norwegian Administration. At present the total number of short wave radio telephone installations is well above 600. Since both Sweden and Norway have great and wellfounded demands on this telephone service, the sharing on the same channels between these countries is a great drawback. Sharing between neighbour countries is on the other hand undoubtedly an advantage, since then the most effective use of the channels may be more readily effected. Although this sharing problem has not as yet been considered in detail, the Norwegian Administration believes that an agreement could be worked out for this. However, referring back to our remarks on channel loading, we must point out that such agreements will be more difficult to work out the more each channel is loaded. It is therefore essential that the single channel in each band proposed for Sweden and Norway should be less heavily loaded than in this plan. In particular the series of requirements for India on the 8 Mc/s channel (8 754.7 kc/s) will cause great difficulties, since radiotelephone communications between Scandinavia and ships in the Mediterranean Sea, the Indian Ocean and the Far East on 8 Mc/s might be impossible without a clear working channel.

In view of the importance of the 17 Mc/s band for communications in the Atlantic and South Atlantic, the sharing with Argentina on 17 302.1 is also too unfavourable.

We suggest that a perfection of this plan should be attempted in the light of the remarks made above.

A consequence of the sharing with Sweden and possible other sharing of these telephone channels is that a disadvantage is placed on our communications on the basis of the comparative small power set for the Norwegian station. We therefore intend to increase the power to 5 kW, or to the higher power used by other stations sharing the channel and the adjacent channels for long distance operations.

No 51.4
C.A. Res. 200

13 December, 1950

Comments on : A, B and D

We beg to refer to your communication No 9.6/764 of October 14, Annex 15, para. 6.a, and our letter of 11 inst.*

Further comments by the Norwegian Administration are enclosed with this letter in duplicate. The comments concern the low frequency band 14 - 150 kc/s and the aeronautical mobile service respectively.

* Published under No. 51.3

I - P.F.B. draft of Frequency List for the band 14 - 150 kc/s
(Reference : Plan of Febr. 15, 1950)

General remarks

According to the original explanation given on the principles used for setting up this plan (Doc. 632), the small channel spacing of 350 c/s has been used in order to accomodate the large number of requirements. As a counter-measure it has been endeavoured to give a great geographical separation between adjacent channels. If such separation were possible in all cases, a satisfactory list might result. There is, however, no doubt that the list shows several examples of insufficient protection to individual services.

The Norwegian Administration considers that a sound consolidation with due regard to the facilities provided in other frequency bands, might in the interest of all lead to the desired result.

A particular case in this connection is the assignment of channels for Hell transmissions, which occupy more frequency space and need better protection. It is essential to economize here. We must question the economy in providing for European Hell service on the following series of frequencies to one country : 55.8 - 62.45 - 64.9 - 75.4 - 79.25 and 81.7 kc/s.

It is realised that one must under adverse conditions on short waves often take recourse to long waves. This is particularly important for North Europe which for a great part is situated in the auroral zone. It is not, however, regarded as appropriate to claim a full set of low frequencies for this contingency, neither to utilize only low frequencies for FX communications in Europe. May we therefore suggest that some of the proposed assignments in this plan be considered in this light. As examples we might here refer to the following series, which concern one country only in each case :

1) 46.0 - 49.85 - 77.85 - 83.8 - 88.0 - 91.85 - 100.6 kc/s

2) 75.05 - 79.6 - 102.7 - 104.45 - 106.9 kc/s

3) 54.05 - 74.0 - 82.4 - 89.4 - 96.4 kc/s

4) 48.1 - 57.9 - 63.15 - 64.2 - 78.2 kc/s

Remarks on specific assignments

36.55 kc/s The distribution of broadcast programmes, which in Norway is effected partly by cable and partly by overhead landlines, has in the past been subject to interference from high power low frequency transmitters. The frequency band in question may be defined as extending from 43 to 34.5 kc/s, where the frequency 42.5 is the position of the carrier frequency. The interference depends on weather conditions and is most severe during the winter.

One important assignment in this connection is the one for Jely on 36.55 kc/s. This frequency which as we see it at the moment, will not be used continuously, but is supposed to be of greater use during low sunspot years, would cause interference with a pitch of

approximately 5000 c/s. The other assignment to Karlsborg on 40.4 would interfere with a tone of 2100 c/s. The present frequency in this last case is 40.5 kc/s and we have experience from last years of this type of interference.

The question has not yet been dealt with officially between the Swedish and Norwegian Administrations. We would here like to suggest that the matter of shifting slightly both these frequencies be studied. If possible they should not come within the band mentioned above, or alternatively, lie nearer the 34.5 end of the band.

55.10 kc/s There is not sufficient protection from the Hell transmissions on 55.8 kc/s, Radom 40 kW, for the important Met transmissions on 55.1, see General Remarks. It is in this connection necessary for the Norwegian Administration to take a reservation, namely, that the channel 55.1 kc/s may be used for Hell transmissions, as an alternative or an addition, to the channel 72.95 mentioned below. The present frequency 55.05 has sometimes been so used in the past.

72.95 kc/s Our press Hell transmissions on this frequency are not sufficiently protected from adjacent channel interference, respectively on 72.6, Sofia 13 kW, Tallinn 10 kW, on 73.3 kc/s, and also S. Assise, on 72.25 kc/s.

91.5 kc/s It is possible that the protection on the receiver site, Longyearbyen, is sufficient in this case.

94.65 kc/s The protection is quite insufficient in several places in Europe (among others Paris, Brussels, Praha) for reception of our FX transmissions on this frequency, mainly due to Paris transmitting on the adjacent channel 94.3 kc/s, but also Bucuresti on 95.35 kc/s.

98.5 kc/s Mutual interference might be expected between this AeroFX frequency and the press Hell transmissions on 98.85 kc/s from Podebrady.

104.8 kc/s The sharing with Narsarssuak, Greenland, is considered unworkable. The protection from Sofia, 13 kW, on the same channel might be insufficient, as well as from Sverdlovsk, 40 kW, on the adjacent channel 104.45 kc/s.

109 kc/s The protection of this channel should be improved, in order to allow for the utilization of this channel for FX communications to Europe, in cases of emergency and when the 100 kc/s radio navigation system comes into operation. This concerns Istanbul on the same channel, and Paris and Wien on the adjacent channels.

149.6 kc/s This AeFX simplex channel would now unfortunately be unworkable, because Tromsø Broadcasting station is working on 155 kc/s according to the Copenhagen Plan. We would suggest that the AeFX channel be transferred to 128.95 kc/s.

In conclusion we would like to add that it will be necessary for us, as a replacement for frequencies around 300 - 400 kc/s for FX communications in the North of Norway, to add two requirements (Auroral Zone requirements) between 120 and 140 kc/s. These will be dealt with according to Section 16 of Atlantic City Resolution.

II - Frequency Allotment Plan for the Aeronautical Mobile Service
Geneva 1948/1949.

The frequency Allotment Plan for the Mobile R service has later (Paris, June 1950) been dealt with according to recommendation N° 4 in the Final Acts of the I.A.A.R.C.

It is the hope of the Norwegian Administration that a plan based upon the original plan, and in accordance with the details worked out later, on station frequency assignments, may finally be implemented.

We have not studied the problem of interference to be anticipated between services working on common channels. Apart from specific cases, which may have to be settled at the Conference, it is further our hope that problems of this nature can effectively be dealt with after implementation of the plan, with the greater chance of success, since the questions in this case concern a service of a marked international character.

The Norwegian Administration does not intend to make detailed comments at this time regarding the plan, but will be pleased to do so later, before or during the conference, as far as this is found to be necessary. This also applies to the frequency allotment plan for the Aeronautical Mobile OR service.

N° 51.5
C.A. Res. 200

15 December, 1950

Comments on : E and F

With further reference to your communication N° 9.6/764 of October 14, (Annex 15, para. 6b), the Norwegian Administration encloses herewith its comments in duplicate to the P.F.B. frequency plans for the bands 4000 to 27500 kc/s.

Comments by the Norwegian Telegraph Administration :

In the Administrative Councils Resolution N° 200, para. 6b, the administrations have been asked to indicate for each plan whether or not the plan is acceptable without major modifications.

Since each plan must be considered in relation to all the other plans, it is not possible to give final opinions on the acceptance of any of these plans, except on the condition that all these other plans could be made acceptable by introducing the necessary amendments. For the time being, we would prefer to confine our remarks to the detailed comments made in the annexed list of remarks.

In order to facilitate further planning on these frequency bands, we have in some cases made suggestions for inclusion of new circuits on the channels proposed for Norway. One of these circuits, which have been notified according to Section 16 of the Resolution, has already been established (HJ 155, Jeloey-Lisboa).

This inclusion of new circuits may be regarded as provisional. A more satisfactory arrangement would be to include an extra assignment for Norway in the Y band.

The frequency plans show some examples of unacceptable or unsatisfactory sharing between Norwegian circuits. We have therefore found it necessary to suggest a rearrangement of the circuits on such individual Norwegian channels.

Unfortunately, the Norwegian Administration cannot in general accept group assignments or adjacent channel assignments. This is because :

- 1) We would like to avoid difficulties with cross modulation, which might occur when the adjacent assignments concern the same transmitting station,
- 2) in Norway transmitting and receiving stations for the same, or for different services, are often situated at close distances.

In connection with point 1) we would like to make special reference to the following assignments (see list of remarks) :

O band, blocks 33 and 34
R band, channels 9874.87 and 9876.5
X band, channels 552 and 555.75
Z band, channels 19567 and 19571.

As regards point 2) we refer to the list of remarks itself.

In conclusion we would like to make the following remarks on the use of frequencies :

The volume of traffic to Paris and Brussels is too great to be handled on the forked circuit HJ 9. We must therefore organize the communications on this circuit in a different manner.

In this and certain other cases we may have to use more than one frequency in the complement at the same time, or alternatively, to utilize a combined set of frequencies allotted to a group of circuits according to traffic needs.

The reservation on the simultaneous use of frequencies in a complement applies also to networks, where in some cases the whole complement may have to be used at the same time, according to distance and traffic.

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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N° 51.6 - C.A. Res. 200

16 December, 1950

Comments on : H

Referring to your communication N° 9.6/764 of October 14, (Annex 15, para. 6a), the Norwegian Administration encloses herewith its comments in duplicate on the Region 1 Plan of Geneva, 1949.

Comments by the Norwegian Telegraph Administration :

The Region 1 Plan has the appearance, at least in part, of being heavily overloaded. If the different channels were often to be used simultaneously on heavy traffic, serious interference could be expected in many important cases. It is impossible to foresee to which extent the services would utilize the frequencies assigned to them, and it is therefore very difficult to judge the quality of individual assignments.

In some cases, however, it is easier to estimate the quality and also the equality of such assignments, particularly when these concern stations in the same service.

During the latter part of the Region 1 Conference the Norwegian Delegation made certain suggestions for amending the plan, some of which could not then be carried through. Some of these suggestions are mentioned in the following, but others may have to be discussed later during the Conference.

The protection for our CP frequencies is in many cases rather small and often inferior compared with certain other assignments. The protection for our small power FX service is also very poor for quite a number of the channels assigned. It is however our intention, as far as possible, to make use of the VHF facilities in the future for this FX service. The change over can not be made quickly and can not be effected for all of these circuits. How far the assigned channels will serve our purpose is therefore a difficult matter to decide at this time.

The frequencies around 1950 kc/s should in our opinion have been assigned in a more efficient manner. The frequency 1967 kc/s assigned to Norway will be almost useless because of interference, and should have been at least 14 kc/s higher.

To avoid difficulties with low MUF values one of the frequencies 3677 or 3690 kc/s should if possible be shifted to the band 3155-3200 kc/s.

The frequency band 3500 to 3800 kc/s is to be shared between the Amateur, the Fixed and the Mobile, except the aeronautical mobile, services. These three services are supposed to share the band on equality of right.

Since this sharing problem has not been dealt with by splitting up the band for exclusive use by each individual service, we presume that the countries intend to allow the amateurs to work in the entire band, perhaps without any specific rules or recommendations to avoid serious or harmful interference to the other two services.

Inasmuch as the amateurs are free to choose their working frequencies, while the two other services must only use their definite assigned frequencies, the presupposition of equal terms for these services are not fulfilled. It therefore seems necessary to encourage the amateurs to take special precautions when working in this band, and always be ready to cease transmission when interference to the other services in the band is manifest or might be anticipated.

NEW ZEALAND

N° 52.1

8 June, 1950

Comments on : O.

In reference to your circular N° 20/30 of the 2nd March last about the draft of the new International Frequency List prepared by the Provisional Frequency Board ; it is desired to make the following comments in connection with the coast stations plans :

(1) Coast radio-telephone stations.

4413.8 kc/s. The New Zealand assignment is satisfactory, except that Hawaii (3 kW) is likely to cause harmful interference on the adjacent channel of 4420.7 kc/s when New Zealand stations are working ships in the Hawaii area.

8783.1 kc/s. There is a possibility of harmful interference from China on the adjacent channel of 8790.2 kc/s and of co-channel interference from the Argentine station.

13188.3 kc/s. The New Zealand assignment is satisfactory.

17325.2 kc/s. " " " " " "

The difficulties involved in providing suitable alternative frequency assignments in the 4 Mc/s and 8 Mc/s bands are recognized.

(2) Coast radio-telegraph stations.

8702 kc/s. Wellington. Satisfactory.

13056 kc/s. " "

17170.4 kc/s. " "

It is regretted that because of operational considerations, certain changes in the plan will be necessary in the case of Awarua and Waiouru.

..... (see telegram herounder)

With the exception of the above-mentioned changes, the plans are satisfactory from New Zealand's point of view, although it must be recognized that changes which may be requested by other Administrations are likely to have a further repercussion on the present New Zealand position.

N° 52.2

Telegram received 22 June 1950

Comments on : C.

Rf my letter P and T 1950/3085 of 8th June about coast station plans stop Disregard references to changes in frequency allocations of Awarua and Waiouru for circuits C HM 5 C HM 8 and C HM 9 stop Now proposed that frequencies shown in radiotelegraph plan for these circuits remain unchanged stop Present plan satisfactory to New Zealand for the circuits shown in the list +

N° 52.3

15 June, 1950

Comments on : A

In reference to your circular letter N° 20/20 of the 10th February last about the draft of the new International Frequency List for stations of the Aeronautical Mobile OR Service : it is desired to inform you that amendments are required to be made in respect of certain of the New Zealand allocations. Details in this regard are indicated on the attached sheet. In addition, the spelling of the place names Ohakea and Lauthala Bay require correction. In the printed list of assignments these places appear as "Ohakia" and "Lanthala Bay" respectively.

It is desired to point out that the list of Aeronautical Mobile OR assignments did not reach this Administration until the 8th May.

Regarding the list of assignments for the Aeronautical Mobile R service : this list is at present under consideration and you will be informed shortly of any comments it is desired to make.

Note : The detailed remarks and comments annexed to the preceding letter have been classified in a set of files, each of which refers to a given service, band or region. The files are at the disposal of the Extraordinary Administrative Conference.

N° 52.4

22 June, 1950

Comments on : B.

Further to my letters P. & T. 1950/3085 of the 15th June about the draft of the new International Frequency List for stations of the aeronautical mobile service : in accordance with the terms of Recommendation N° 4 of the Final Agreement of the International Administrative Aeronautical Radio Conference, discussions with the Australian authorities about station frequency assignments have been held and an assignment list for stations under New Zealand's control has now been prepared.

As form N° 2 is not now appropriate for notifying the frequencies to be used, forms in use by this Administration have been substituted and completed copies are attached hereto for your information. In order to avoid confusion it has been found desirable to allocate a new series of circuit numbers.

The frequency usage plan for New Zealand Aeronautical Mobile "R" Services is in conformity with the plan developed by the I.A.A.R.C. and consequently the frequency assignments to stations should be recorded in the REGISTRATION column. Thus full compliance with Resolution N° 6 of the Final Agreement of the I.A.A.R.C. is claimed.

Note : The forms annexed to the previous letter constitute the assignment frequency list for the Neo-Zealand stations of the Aeronautical Mobile "R" Service and have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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N° 52.5

22 June, 1950

Comments on : E and F.

In reference to your circular letters N° 20/59 and 20/72 of the 6th and 18th April respectively about the draft of the new International Frequency List prepared by the P.F.B. : a study of the draft lists has been made and it is apparent that all the New Zealand requirements submitted have been dealt with by the Provisional Frequency Board and that no circuits have been omitted. It is clearly evident, however, that some of the sharing plans are no satisfactory to New Zealand and detailed comments in this regard will be found on the attached sheets. (1)

Although this Administration requested that certain of its fixed stations be permitted to operate in the 4063-4438 kc/s maritime mobile band under the provisions of paragraph 155 of the International Radio Regulations, it would appear that the high power used by many coast stations would make operation of fixed services stations in this band extremely difficult. In these circumstances it is desired that these fixed service circuits be transferred to the "F" band of frequencies.

- 1) A new detailed comment has been given in a letter dated 6 July 1950.

Note : The detailed remarks and comments annexed to the previous letter and those contained in the letter of 6 July 1950 have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

No 52.6
C.A. Res. 200

18 December, 1950

Comments on : A, B, C, D, E, F, G and J

Your circular letter 9.6/764, 14th October, 1950 did not reach New Zealand until 28th November, 1950, and, consequently, little time has been available in which to reply. The copies sent by you on the 20th October were delayed due to being sent as "air freight" and it is desired that, in future, normal air letter mail facilities be used for such matters of importance and urgency. A cabled reply to your telegram 157/18th November indicated that because of the delay involved in receipt of the necessary information this letter may be slightly delayed.

The New Zealand Administration now desires to comment with particular reference to Annex 15 of 9.6/764 (Resolution 200 of the Administrative Council) as follows : -

1. Region 3 Plan.

The Region 3 Plan in its present form with a few amendments and additions is satisfactory to New Zealand, but leaves little scope for expansion in New Zealand radio services. This is due to the fact that we have had in the past a 5 kc/s channelling scheme above 1,605 kc/s, and continued on this basis during the Region 3 Conference, especially as the conference recommendation was based on a 5 kc/s system. However, the Australian Administration found it necessary to adopt a 4 kc/s scheme, and, after analysis in New Zealand during the past few months, it has been decided that it would be desirable to adopt the same channelling system as Australia, in order to simplify sharing and to avoid the presence of 1, 2 and 3 kc/s heterodynes.

This work could have been deferred, but it was considered that users could not reasonably be expected to be involved in two frequency changes, one to the existing Region 3 Plan, involving 77 New Zealand frequency changes and the second to meet a 4 kc/s channelling requirement at a later stage. Opportunity was accordingly taken of the deferment of The Hague Conference to initiate the work involved, and it is now under way. The process will not be completed until early next year and it will not be possible to notify the Union of all the changes involved until about April, 1951. These changes will be extensive and practically every New Zealand assignment in the Region 3 Plan above 1,605 kc/s will require alteration.

The repercussions on the work in Geneva are appreciated, and accordingly every effort will be made to present the modifications in a convenient form for easy incorporation in any list. To this end, data will be presented in the form of List I Appendix 6 R.R., i.e., the "International Frequency List". In preparing the amendments, full cognisance will be taken of interference questions, both by discussions with neighbouring countries, or by inspection of the Region 3 List already prepared at Geneva, 1949.

It should be appreciated that any changes in Tropical Broadcasting Plans will of necessity have a further repercussion on the New Zealand List. This cannot be assessed until the Extraordinary Conference.

So far as changes below 1,605 kc/s are concerned, these will be comparatively minor in scope and are not likely to affect countries other than Australia with which Administration prior understandings will have been obtained.

Please rest assured that we will do everything in our power not to allow these changes to affect unduly the work involved at the Extraordinary Conference. It is regretted that they are so extensive, but in the light of all factors the New Zealand Administration will have no alternative but to request the Conference to take cognisance of them.

2. Aeronautical Mobile Service Plans

These are completely acceptable to New Zealand in their present forms.

We have finalised such negotiation as appears necessary in respect of R.D.A.R.A. and sub-R.D.A.R.A. frequencies for the "R" plan. You have been notified of these frequencies together with M.W.A.R.A. frequencies in a form which permits of the preparation of a station assignment list (Reference Recommendation No. 4 I.A.A.R.C.).

The "OR" station assignment list has been corrected and amended.

We consider that the basic frequency allotment plan for the aeronautical "R" service should not be altered at the Extraordinary Conference, the work involved being too great. However, we are quite agreeable to new assignments being made providing the technical standards of the I.A.A.R.C. are respected, both for "R" and "OR" station assignment lists.

3. High Frequency Maritime Mobile Telephony and Telegraphy Plans.

These are acceptable to New Zealand in their present form with certain minor amendments and additions. The New Zealand Administration is prepared to support the contention that telegraph emissions should normally be limited to A1 and that power should normally be limited to the extent shown in Document No. 591 of the P.F.B. We believe that it is only by the limitation of power that satisfactory accommodation for requirements can be found.

4. Fixed service plans.

Despite the fact that plans were not prepared for several bands, we find that in the bands where plans have been made the majority of assignments made to New Zealand are satisfactory.

We are not satisfied with the Fixed Service Assignments made to New Zealand in the Maritime Mobile band of 4,063 - 4,438 kc/s under the terms of Number 155 R.R. We will suffer mutual interference between cargo ships and our own coast stations and fixed stations, and, further, the extremely high powers used by other coast stations would make the operation of our low power fixed services too difficult. We further note that certain of the assignments made to New Zealand are in derogation of Number 155 R.R.

and we do not agree that this should be the case. Consequently, we will request the transfer of these circuits to fixed service bands, preferably F.

Comments in respect of New Zealand assignments in fixed service plans (excluding consideration of Section 16 requirements) prepared by the Provisional Frequency Board are as follows : -

F Band	Almost entirely satisfactory as it stands, but we request certain additions (see above).
G Band	Two readjustments required.
H Band	One readjustment required.
I Band	Entirely satisfactory.
J Band	Satisfactory.
K Band	No Plan.
L Band	No Plan.
M Band	No Plan.
N Band	No Plan.
O Band	No Plan.
P Band	No Plan.
Q Band	One readjustment.
R Band	Satisfactory.
S Band	Satisfactory with one readjustment.
T Band	No Plan.
U Band	Satisfactory with two readjustments.
V Band	Satisfactory.
W Band	Unsatisfactory.
X Band	No Plan.
Y Band	Satisfactory with one readjustment.
Z Band	Satisfactory with one readjustment.
aa Band	Satisfactory.
bb Band	Satisfactory
cc Band	Satisfactory
dd Band	Satisfactory with two readjustments

ee Band Satisfactory.

ff Band Satisfactory.

There are, of course, Section 16 additions and amendments required in the above plans. The effect of these amendments may make the plans less satisfactory to New Zealand. Further, amendments being made by this Administration may make existing shares unacceptable to other Administrations. Where plans are stated as being satisfactory to this Administration it is on the clear understanding that other Administrations are utilizing sufficiently directive transmitting antennas on adjacent channels as well as co-channels. In most cases, the shares would necessitate the use of better receiving antenna systems by this Administration.

5. 14 -- 150 kc/s Plan - No assignments to New Zealand.

6. High Frequency Broadcasting Plan.

No comments as there is no plan. However, we are prepared to support fully the final Recommendations of the Rapallo Conference.

7. General (In relation to (c) of invitation of Resolution 200 of Administrative Council).

The New Zealand Administration adheres to the principle of an orderly development of use of the Radio Frequency Spectrum, and believes that the progress made to date, being substantial, cannot lightly be jettisoned. It is considered that the engineering rules developed by the P.F.B. if wisely used can produce a more economical frequency usage system. In our own case we have 242 Berne registrations for fixed circuits on frequencies higher than 3.9 mc/s. The P.F.B. procedure with an application of stringent consolidation of circuits and frequencies gives 194 frequencies, a saving of 48 frequencies or about 20%. Consequently, there is no inflation either in registration or in the engineering procedure.

It is our view that there can be no progress without some sacrifice, and while we recognise that countries must protect their important circuits, nevertheless we believe that it is the desire of the majority of countries to have order rather than confusion. If, to achieve this objective, it is necessary to restrict for the time being frequency demands, then this should be done.

We believe that there is greater room for consolidation of requirements on the part of all countries. We have 123 fixed circuits using frequencies above 3.9 mc/s. The P.F.B. rules have given 388 frequencies by straight application. With consolidation 194 frequencies are obtained. We are unable to go further at this stage, but we think, having reduced by 20% our Berne list filings for a small number of circuits, that countries having large numbers of circuits can at least reach this figure, there being more possibilities of reduction.

We find that cases of harmful interference are on the increase. Reports from stations under the control of this Administration indicate that congestion of the spectrum is not mere fantasy. Shifting fixed circuits into a narrower spectrum space will not decrease the effect but obviously will increase it. Consequently, for a proper approach we must limit the

assignments being made, Administrations must, therefore, if satisfaction is to be attained, reduce their demands. This cannot be over emphasised. If we do not sacrifice our demands then our services will be sacrificed by interference. The picture is very clear.

We are prepared to adopt any reasonable policy which will provide an orderly approach to the problem backed up by further consolidation and restriction. We fully realise that equipment design must play an important part in any such approach. The development will prove expensive. The time-sharing of circuits requires reconsideration.

It is our desire that the Aeronautical Plan be introduced at the earliest possible moment. This could not be accomplished frequency by frequency, since the frequencies for the Aeronautical Plan - and for the Maritime Mobile Plans - are not necessarily the same as exist to-day for other circuits occupying the adjacent spectrum space. With fast flying national and international aircraft depending upon a planned communications system, both mobile and fixed, we would not be able to agree with any move which may tend to leave any other circuits operating in the bands over any period of time. Therefore, we would require to shift frequencies band by band. As it would appear that any Aeronautical Mobile Plan must be introduced simultaneously world-wide, to provide for M.W.A.R.A. - similarly any Maritime Mobile Plan - it must then follow that all changes must be made in a relatively short period.

If this is to be done, then we feel that all fixed circuit frequencies must be negotiated in advance, which means negotiation at the Extraordinary Conference, and which in turn means an earnest endeavour to prepare an orderly and co-ordinated International Frequency List.

Summarising, we advocate the following approach to the existing problem.

1. The acceptance of existing plans as far as possible -- Regional, Aeronautical and Maritime Mobile and Fixed, as suggested by the Administrative Council.
2. The development of an orderly approach to the problem of the fixed bands based on a greater reduction of demands in the first instance.
3. The containing of international high frequency broadcasting services in the appropriate bands - preferably on a planned basis but in any case with limitation to the appropriate bands.
4. The implementation of services possessing frequencies lying above 3.9 mc/s within a restricted period.
5. The implementation of services possessing frequencies lying below 3.9 mc/s in a restricted period, not necessarily, but preferably at the same time as in 4.

The reply to (d) of the invitation contained in Resolution 200 will follow later. It will not be possible to furnish any data in respect of (e), since this Administration's monitoring activities are confined to its own services at the present time.

PAKISTAN

Nº 53.1

13 May, 1950

Comments on : A.

Please refer to your Circular letter Nº 20/20 of 10th February, 1950 on the above subject forwarding the draft frequency list for the Aeronautical Mobile OR service. This Administration has found the list acceptable and has no further comments or observations to make.

Nº 53.2

27 May, 1950

Comments on : D.

Please refer to your Circular letter Nº 20/45 of the 16th March, 1950 and the draft of the International Frequency List forwarded for the band 14 - 150 kc/s. This Administration has considered the list and has no comments to offer.

Nº 53.3

30 May, 1950

Comments on : E and F.

Reference your circular Nº 20/59 of 6th April 1950 stop This Administration has the following comments and observations on the draft frequency lists forwarded Stop

- a) The time given to the Administration for examination of the frequency lists for submission of comments and observations by 1st June most inadequate stop Considering the dated by which draft frequency lists were received and the volume of work involved in detailed examination it is impossible for this Administration to send any detailed comments and observations Stop
- b) From the preliminary examination made of some of the draft frequency lists by bands this Administration feels that the assignments made against Pakistan's requirements in certain bands have in a number of cases been unsatisfactory and hence unacceptable stop To furnish few examples in band Q out of a total of 460 kc/s 45 kc/s only assigned against 31 requirements a majority of which given adjacent channels stop Forced consolidation in many cases involving assignments between 5 to 6 national circuits of different departments considered incapable of satisfactory operation stop Similarly in band R out of a total bandwidth of 220 kc/s Pakistan's assignments are only 13 kc/s against 13 different requirements and hence unsatisfactory Stop

- c) Regarding extended channelling plans for bands P, T and X this Administration wishes to record that it has already consolidated its requirements in full and there is no possibility for any further reduction in its requirements Stop
- d) As regards bands K, L, M, N and O this Administration recommends that stations of power below 25 watts of all administrations may be considered on notification basis Stop
- e) This Administration wishes to bring it to the notice of the Members of the I.T.U. its exceptional position with regard to its frequency requirements as notified vide I.T.U. Notification No 567 of 16th January 1949 Stop Pakistan came into being on 15th August 1947 and requirements as filed with P.F.B. before April 1948 do not adequately represent the actual needs Stop The circuits of various departments had not stabilised and hence this Administration would request consideration of its Article 16 requirements along with the original requirements on an equal footing Stop
- f) In view of points a) to e) this Administration reserves its position with regard to these draft frequency lists +

No 53.4

30th May, 1950

Comments on : C

Reference your circular No 20/30 regarding maritime mobile telegraph telephone plans Stop Because of the fact that Pakistan is divided in two portions linked by sea she has perforce to rapidly develop her mercantile marine navy and establish new ports Stop The frequencies assigned for telegraphs working in maritime mobile bands are insufficient to cope with even our present requirements Stop Also no assignments have been made for telephone channels Stop Under the circumstances Pakistan reserves her right to submit additional demands for maritime mobile plans at the forthcoming September Conference and its acceptance of the maritime plan is depending on her essential requirements being satisfactorily met +

No 53.5

30th May, 1950

Comments on : J

Reference your letter No 10.4/1 of 16th January, 1950 regarding Region 3 Conference frequency list Stop From preliminary examination the list can be generally accepted Stop However detailed comments and amendments if any will be submitted later Stop This Administration would record that insufficient separation has been given to A1 A3 channels Stop The general spacing allotted is 2.5 kc/s and in some cases as low as 1.25 kc/s which is unsatisfactorily +

Nº 53.6
C.A. Res. 200

20th February, 1951

Comments on : E, J and the whole of the draft list

In continuation of our telegram dated the 31st December, 1950 in which comments amplifying those previously submitted were promised, I have been directed to invite your attention first to the original comments offered in June 1950⁺ on the various draft lists. Following additional comments are now offered :

I - Region 3 Plan

1. In the medium wave broadcasting assignment plan poor co-channel protection has been provided in the following assignments to Pakistan's stations :

570 kc/s, 750 kc/s, 830 kc/s, 1160 kc/s.

Poor adjacent channel protection has been provided in the following assignments to Pakistan's stations :

790 kc/s, 1030 kc/s, 1050 kc/s, 1080 kc/s, 1100 kc/s, 1210 kc/s, 1260 kc/s, 1340 kc/s.

Proposals for improving the protection will be made by the Pakistan Delegation at the Geneva August Conference.

2. Band 2300 to 2500 kc/s :

A number of low power fixed stations have been placed near the broadcasting stations with a separation of only 5 to 7.5 kc/s. Because of their proximity to the broadcasting stations harmful interference will be caused. In most of the cases, poor co-channel or adjacent channel protection have been provided which make the stations unsatisfactory for broadcast transmissions. Specific proposals for improving any assignments will be taken up by the Pakistan Delegation at the August Conference.

II - Provisional Frequency Board Plans (Broadcasting assignments)

Bands D and E (3900 - 3950 kc/s and 3950 - 4000 kc/s)

Our demand for 5 channels in this important band has not been met with satisfactorily. We have been assigned only 2 channels, that is, 3915 and 3955 kc/s for the period 0230 to 0730 GMT. The hours of operation of these frequencies require to be revised to cover the period 0100 to 1900 GMT.

Band 4750-5060 kc/s

In this band all the 5 channels have been assigned for operation from 0100 to 1800 GMT, whereas the requirement is for the period 0100 to 1900 GMT. A number of low power fixed stations have also been placed near to the broadcasting stations and the Pakistan Delegation to the August Conference will take up the cases for improvement of protection for the stations.

Pakistan's special position with regard to the radio frequencies is well known. The requests sent to the Provisional Frequency Board in 1947

⁺ See comments published under N^{os} 53.1 to 53.5

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do no longer represent the actual requirements of our expanded services. To meet the pressing needs for expansion of broadcasting a number of new services had to be introduced and the International Telecommunication Union is requested to consider these requirements on par with the requirements filed earlier. In many cases the additional services are being provided by extension of the hours of operation, increase of powers. To increase the zone of services and also to take care of the conditions of the lower sun spot activities specially during the winter season the frequency assignments in these bands have to be adequate.

Attached separately is also a list of the amendments (Appendix I) proposed to the assignments and it is hoped that the I.F.R.B. will find it possible to accept and introduce the amendments subject, of course, to the approval of the other countries.

III - Provisional Frequency Board Plans (other than broadcasting)

Detailed comments for different bands are enclosed herewith (Appendix II). It would appear from the comments that assignments in many cases have been prepared after ruthless consolidation of the requirements. In band Q out of a bandwidth of 460 kc/s, approximately 30 kc/s have only been allotted to Pakistan. In band R (225 kc/s) against 13 requirements, only 13 kc/s have been assigned. In band G 4438 kc/s to 4650 kc/s, in a majority of assignments, Russian stations with high powers are placed only 1 kc/s away from Pakistan stations.

In a majority of cases, our low power stations have not been given adequate protection. Considering the fact that we are using low powers for our internal services, with a view to economical use of spectrum, this interference would be most prejudicial to such operation and would defeat the purpose of operation with low power.

IV - Pakistan's special position with regard to frequency requirements

I have also been directed to invite your attention to Pakistan's exceptional position with regard to its frequency requirements as notified vide I.T.U. Notification No 567 of 16th January 1949. Pakistan came into being on 15th August 1947 and requirements as filed with P.F.B. before April, 1948 do not adequately represent our actual needs. Our circuits had not stabilised at the time of filing the requirements and hence this Administration would request consideration of our Article 16 requirements along with original requirements on an equal footing.

Note : Annexes 1 and 2 to the previous letter have been classified in a set of files, each of which refers to a given service, band or Region. These files are at the disposal of the Extraordinary Administrative Conference.

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PARAGUAY

N° 55.1

8 May, 1950

Comments on : E.

I have the honour to acknowledge receipt of your circular letter N° 20/59, dated 6 April 1950, together with some of the documents mentioned therein.

We have not, however, received the documents mentioned in paragraph 1 of the second part of your letter nor the list of frequency requirements for inclusion in bands K, L, M, N and O.

Since the draft assignment plans you have sent us do not include almost the totality of our country's requirements, a large percentage of which concern circuits already in operation, absolutely essential for the normal development of our communications, I have the honour, in accordance with paragraph 7 of Resolution N° 154 of the Administrative Council, to enclose herewith a list of these minimum requirements for consideration by the Extraordinary Administrative Radio Conference to be held at the Hague this September.

With respect to requirements in bands K, L, M, N and O, since we have not received the relevant documents, we are still in the dark as to whether our requirements have been included.

As soon as we have the relevant documents, we shall send the General Secretariat as soon as possible any comments we may have on the draft assignments.

Note : The list annexed to the previous letter has been classified in a set of files which are at the disposal of the Extraordinary Administrative Conference.

N° 55.2

31 May, 1950

Comments on : F.

List frequency requirements for inclusion in bands K, L, M, N and O does not cover major part of declared requirements our services Stop Confirmation and details follow by airmail.

NETHERLANDSSURINAM, NETHERLANDS ANTILLES AND NEW GUINEA

No 56.1

27 May, 1950

Comments on : E and the whole of the draft list.

Referring to your circular letter No 20/59 dated April 6th 1950, I have the honour to inform you of the following :

The Netherlands Administration is of the opinion, that generally speaking the engineering framework which the Provisional Frequency Board determined pursuant to par. 12 of the Atlantic City Resolution relating to the preparation of the new International Frequency List, is an important contribution to the field of radio communications. In future it will be possible to determine each frequency required for a given radio circuit wherever in the world and for any hour of the day in every season throughout the solar cycle. In this respect the work of the P.F.B. has become a complete success.

The said Resolution, however, states in par. 11 that the engineering principles are to be applied in the preparation of the new Frequency List in such a way as to improve the utilization of the radio spectrum by providing for the continued operation of all services in every country, while eliminating harmful interference.

The Netherlands Administration regrets very much, that in studying the draft List closely, it came to the conclusion that it has not been possible for the P.F.B. to come up to this point of its task satisfactorily, at least not as far as the frequencies for the services of the Netherlands, Surinam, Curaçao and Netherlands New Guinea are concerned.

It seems unnecessary to summarize here the various reasons for which it became impossible to draw up a draft List satisfactory to every country. From several documents of the P.F.B. on discussions which took place on this point, it results, that these reasons are very clear and well known to all those interested.

Nevertheless, it may be of importance to dwell on one of the main reasons.

In applying the engineering principles the P.F.B. found that the frequency complements for a large number of circuits had to be much more extensive than operational practice for many years had shown to be

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necessary. This means, that the total number of frequencies required in accordance with the adopted principles is still much higher than the number of frequency requirements submitted by the various Administrations already was.

The P.F.B. request to consolidate those requirements was, therefore, very reasonable.

From the very outset of the preparation of a new Frequency List, the Netherlands Administration restricted its requirements to the utmost, not only as far as the P.T.T. radio services were concerned, but also as regards the other radio services in the Netherlands. In addition to the request of the P.F.B. the requirements were reconsidered and consolidated as far as practicable.

A study of the draft List shows, that, in spite of this, the assignments to the Netherlands radio services have been cut down tremendously.

From the list annexed to this letter you may learn that in the Bern List of 1947, 402 frequencies were notified for the Netherlands, 124 of which having priority.

The Netherlands requirements amounted to 238 frequencies, whereas the P.F.B. draft List shows only a total of 164 frequencies.

When considering only the frequencies for P.T.T. services, you will observe from the annex that in the Bern List 195 frequencies were notified, 111 of which having priority. The requirements amounted to 89 frequencies, whereas only 59 were assigned.

The position proposed appears to be even more serious when considering the extremely important 18 Mc/s band alone. At present the Netherlands P.T.T. radio services have at their disposal 34 frequencies in this band, as laid down in the Bern List of 1947. Out of these 34 frequencies 25 have priority. We submitted requirements to a number of 17 and only 3 were assigned.

Taking into account the fact that prevention and elimination of harmful interference are the main objects in preparing a new Frequency List one may compare the indication "Priority" with the indication "International Protection from harmful interference", the latter meaning registration in the "Registration Column". When considering in this light the strong position of the Netherlands radio services in the Bern List as compared with the position in the draft List, one might jump to the conclusion that there would be an advantage for the Netherlands Administration in accepting this draft for 124 frequencies with "Priority" were to be replaced by 164 frequencies having the right to "International Protection."

Irrespective of the fact that it does not in any way hold good for the frequencies assigned to the P.T.T. services, especially not relative to the 18 Mc/s band, this reasoning cannot possibly be maintained when studying the numerous cases of frequency sharing from the point of view

of a sound engineering basis.

This may be illustrated by the following examples :

I. The frequency of 9 448.25 kc/s has been assigned to the circuit Amsterdam-Lima and to the circuits Amsterdam-Djakarta and Amsterdam-Curaçao as well. As this frequency must be used in all three directions at the same time, the assignment cannot possibly be implemented. Moreover, the circuit Amsterdam-Lima is a simple P.T.T. telegraph circuit; whereas both circuits Amsterdam-Djakarta and Amsterdam-Curaçao are press (Hell) circuits.

II. The frequency of 14 951.25 kc/s has been assigned to both circuits Amsterdam-Lisbon and Amsterdam-New York/Paramaribo. Here again a considerable difference in type of emission, morse and teletype respectively. Should the circuit Amsterdam-Lisbon become a teletype communication in the future, even then simultaneous use would be impossible. The draft list suggests that the frequency is to be used at different periods of time for the two circuits, but 14 or 15 Mc/s is usable for Lisbon from 7 a.m. to 4 p.m. (gmt) and for New York from noon till late in the evening, which results in an overlap of at least 4 hours.

III. In many cases the same frequency was assigned to the circuits Amsterdam-Cairo and Amsterdam-Tangier. Simultaneous use is impossible on account of the difference in type of emission, but in addition the traffic in both directions is heavy to such an extent that sharing cannot be accepted, not to mention one of the said cases where the circuit Amsterdam-Djakarta was added.

It needs hardly be said, that in these and also in many other instances the numerous cases of sharing with foreign circuits have contributed to the conclusion at which the Netherlands Administration has arrived. This conclusion reads as follows :

From the above remarks it results that the Netherlands Administration has shown to be quite willing to cooperate in preparing a new Frequency List even to such an extent, that it is ready to relinquish a good deal of its strong position with regard to the frequencies, thus sacrificing something for the sake of the I.T.U.

However, the Netherlands Administration is sorry to say that it cannot go so far as to accept the draft List as it reads at present. Acceptance would, no doubt, mean deterioration of the Netherlands radio services in an unwarranted way, for the simple reason that even the number of frequencies assigned is less than the number of frequencies in use at present.

The Netherlands Administration is well aware of the fact that the results of the work of the P.F.B. have turned out to be disappointing and also that it will be very difficult to show the way to achieve better results.

Due to lack of time the Netherlands Administration is unable to submit constructive proposals to improve the general situation at present, but it hopes to be in a position to do so in the course of the forthcoming Extraordinary Administrative Radio Conference.

Annex

Survey of the number of frequencies
mentioned for the Netherlands in the
P.F.B. draft Frequency List.

Frequency band	Number of frequencies							
	Notified		Priority		Required		Assigned	
	Netherlands	PTT	Netherlands	PTT	Netherlands	PTT	Netherlands	PTT
<u>kc/s :</u>								
14-150	5	4	5	4	7	4	7	4
2850-4000	3	-	-	-	3	-	8	-
<u>Mc/s :</u>								
4	40	3	1	1	26	-	7	-
5	25	1	2	1	11	1	3	-
6	32	7	1	1	19	1	5	-
7	27	19	7	7	16	8	unknown	-
8	44	7	4	2	35	4	9	-
9	17	9	4	4	7	6	10	3
10	35	26	6	6	14	13	18	11
11	8	2	-	-	9	-	5	2
12	17	4	2	1	11	2	13	4
13	17	7	3	2	7	3	6	2
14	18	13	2	2	7	7	7	6
15	6	2	2	2	-	-	1	-
16	15	3	9	3	6	2	6	2
17	8	3	2	1	9	1	15	3
18	34	34	25	25	21	17	6	3
19	5	5	5	5	6	4	8	4
20	18	18	16	16	7	7	5	5
21-27	28	28	28	28	17	9	25	10
Total	402	195	124	111	238	89	164	59

Nº 56.2
C.A. Res. 200

24th January, 1951

Comments on : C, E, F

1. With reference to Resolution Nº 200 of the Administrative Council "Preparation for the Extraordinary Administrative Radio Conference" and to the Secretary General's telegram Nº 157/18 of 18th November last, I advise you that in co-operation with all the Netherlands radio services the Netherlands Administration has reconsidered :

- a) the frequency assignment plans already prepared for the frequency bands below 4 000 kc/s and the frequency assignment plans prepared for the maritime mobile and aeronautical mobile services;
- b) the draft frequency assignment plans in the frequency range between 4 000 and 27 500 kc/s, other than those covered by a) above..

2. The Netherlands Administration has no objection to the frequency assignment plans for the frequency bands below 4 000 kc/s.

3. Comments, however, are made on the frequency assignments between 4 000 and 27 500 kc/s to :

- I) the P.T.T. fixed services;
- II) the aeronautical fixed services;
- III) the maritime mobile services;
- IV) the International Police Commission network;

for each of which a separate list in double is enclosed.

4. As already stated in my letter dated 27th May, 1950*, acceptance of the draft List as it reads at present, would, to my regret, be impossible. My Administration could of course not agree to a plan, which would mean the closing down of a number of its radiocircuits and the degrading of the quality of its radioservices or the substantial reduction of the traffic.

5. Our requirements have reflected the real position of the frequencies which we actually need for our various radioservices. No excessive or extravagant demands for frequencies have been made by us. It is therefore evident that we cannot accept the very large reductions in our requirements as have been proposed in the plans prepared by the P.F.B. These reductions were based on the excessive total demand for frequencies made by the various countries, a number of which has obviously sent in requirements in excess of those which would follow from the correct application of the rules laid down in the Atlantic City P.F.B.-Resolution.

6. I sincerely hope that the forthcoming Extraordinary International Administrative Radio Conference may succeed in solving problems then, as we could only sign a future plan if at least our present services can continue their operation, without experiencing harmful interference.

At present our services are operating generally in a satisfactory way, on the basis of the Bern List of 1947. This will grosso modo be also the position in most of the other countries.

* Published under Nº 55.1

The proposed severe reductions are therefore to a certain extent artificial and not based on the real situation of the loading of the ether.

7. The methods to be applied for the new International Frequency List should be such, that the present day radioservices could continue their operation, whilst space is created for future services and extensions. I do not doubt that after the strenuous and serious efforts already put in solving this important problem, the elaboration of such methods will appear to be possible, based on the reality on one side and on the strong will of international cooperation on the other side.

It is with great pleasure that I have noted that the I.F.R.B. is also studying new methods and new approaches of the problems. The Netherlands Administration will, within the limits of its possibilities gladly fully cooperate with the efforts leading to reach our common aim.

I) General comments concerning P.T.T. fixed services

a) Circuit Amsterdam - New York

Requirement numbers : EJ 64, 65, 66, 67, 68, 69, 71, 72, 74, 75.

At present 27 frequencies (12 for radiotelegraphy and 15 for radiotelephony) are in use, out of which 18 (8 for radiotelegraphy and 10 for radiotelephony) having priority according to the Bern List of 1947. The P.F.B. documents assign 12 frequencies (8 for radiotelegraphy and 4 for radiotelephony) to this circuit, one of which being entirely unserviceable and another two probably unserviceable owing to sharings.

The number of assignments is unacceptable, but moreover not a single frequency in the important 18 and 19 Mc/s-bands has been assigned.

Operational practice during many years has proved that these bands are usable for the greater part of the daylight hours.

b) Circuit Amsterdam - Indonesia

Requirement numbers : EJ 1, 2, 3, 4, 5, 7, 8.

At present 20 frequencies (9 for radiotelegraphy and 11 for radiotelephony) are in use, 12 of which (7 for radiotelegraphy and 5 for radiotelephony) having priority according to the Bern List of 1947.

The P.F.B. documents assign 14 frequencies (8 for radiotelegraphy and 6 for radiotelephony) to this circuit, 5 of which being entirely unacceptable and another one probably unserviceable on account of sharings. Moreover the number of assigned frequencies is less than the number actually in use.

c) Circuits Amsterdam - Curaçao, Amsterdam - Surinam

Requirement numbers : EJ 73, 76, 77, 78, 79, 80.

At present 20 frequencies used (6 for radiotelegraphy and 14 for radiotelephony), 7 of which (1 for radiotelegraphy and 6 for radiotelephony) having priority according to the Bern List of 1947.

The P.F.B. documents assign 16 frequencies (11 for radiotelegraphy and 5 for radiotelephony) 5 of which being entirely unacceptable.

The number of assignments is again below that of the frequencies already in use.

d) Circuit Amsterdam - Indonesia

Requirement number : EJ 18

At present 3 frequencies are in use, 2 of which having priority according to the Bern List of 1947.

The P.F.B. documents contain 3 frequencies one of which is unserviceable.

e) Direction Amsterdam - North Africa

i) Amsterdam - Cairo

Requirement number : EJ 22

At present 3 frequencies for radiotelegraphy are in use, all of which having priority according to the Bern List of 1947.

The P.F.B. documents contain 5 frequencies, 2 of which in the not-contained bands P and T.

ii) Amsterdam - Tangier

Requirement number : EJ 62

At present 3 frequencies for radiotelegraphy are in use, 2 of which having priority according to the Bern List of 1947.

The P.F.B. documents contain 5 frequencies, 2 of which in the not-contained bands P and T.

f) Direction Amsterdam - South America

i) Amsterdam - Rio de Janeiro/Buenos Aires

Requirement numbers : EJ 9, 10, 11, 12, 13 (Forked circuit)

At present 18 frequencies (11 for radiotelegraphy and 7 for radiotelephony) are in use, 14 of which (9 for radiotelegraphy and 5 for radiotelephony) having priority according to the Bern List of 1947.

The P.F.B. documents contain 10 frequencies (6 for radiotelegraphy and 4 for radiotelephony) for this circuit, 2 of which are entirely unserviceable.

The number of frequencies assigned to this important forked circuit is far below the need, and therefore, cannot possibly be accepted.

ii) Amsterdam - Lima

Requirement numbers : EJ 14

At present 3 frequencies for radiotelegraphy are in use, 2 of which having priority according to the Bern List of 1947.

The P.F.B. documents contain 3 frequencies for this circuit, 2 of which, however, being unserviceable.

g) Amsterdam - European countries

Requirement numbers : EJ 19 (Amsterdam - Lisbon), EJ 20 (Amsterdam - Bern), EJ 21 (Amsterdam - Rome), EJ 23 (Amsterdam - Stockholm).

At present 12 frequencies are in use for radiotelegraphy, 4 of which having priority according to the Bern List of 1947.

The P.F.B. and the Regional Conference for Region 1 assign only 7 frequencies, 2 of which being unserviceable. Moreover in the meantime the circuit Amsterdam - Prague has been reopened.

Recapitulation

Number of frequencies in use and assigned to P.T.T. fixed services

Mc/s band	Number of frequencies						Total		
	In use		Assigned by P.F.B.	In use		Assigned by P.F.B.	In use		Assigned by P.F.B.
	T.	P.		F.	P.		T+F	P.	
3	3	-	3	-	-	-	3	-	3
4	1	1	-	-	-	-	1	1	-
5	1	1	1	-	-	1 (1)	1	1	2 (1)
6	3	-	-	-	-	-	3	-	-
7	9	5	2 (2)	4	2	-	13	7	2 (2)
8	2	-	-	2	1	-	4	1	-
9	4	4	4 (3)	-	-	-	4	4	4 (3)
10	7	5	8	12	2	4	19	7	12
11	-	-	2 (2)	-	-	-	-	-	2 (2)
12	-	-	3 (2)	3	1	2 (2)	3	1	5 (4)
13	2	2	3 (3)	2	-	1	4	2	4 (3)
14	6	1	5 (2)	3	1	2 (1)	9	2	7 (3)
15	1	1	-	-	-	-	1	1	-
16	2	2	-	-	-	-	2	2	-
17	1	-	4 (2)	-	-	-	1	-	4 (2)
18	8	6	5 (5)	12	9	3 (3)	20	15	8 (8)
19	3	3	1	1	1	2	4	4	3
20 (and higher)	9	8	14 (2)	8	8	4 (1)	17	16	18 (3)
	62	39	55 (23)	47	25	19 (8)	109	64	74 (31)
<p>P = Priority T = Telegraphy F = Telephony</p> <p>Attention is drawn to the fact that frequencies assigned to different circuits have been counted for each circuit concerned. This means that the total number of frequencies assigned as compared with the number of frequencies in use is still more unfavourable than the recapitulation shows.</p> <p>The number of unserviceable frequencies is put between brackets.</p>									

II) General comments concerning Aeronautical Fixed Services

As a result of the I.C.A.O. Aeronautical Fixed Telecommunications Meeting for the European-Mediterranean Region, Paris 1949, the grouping of stations in the aeronautical fixed service differs in some respect from that originally submitted to the P.F.B.

The new grouping is shown in the annexed table.

Amsterdam (Schipol) is only in communication with the underlined airfields.

The frequency assignments to many networks are insufficient to ensure a satisfactory continuous service.

III) General comments concerning Maritime Mobile Services

- a) The remarks concerning the frequencies assigned by the P.F.B. to the Netherlands for public correspondence in the Maritime Radio Service, will at this stage be limited to the principal telegraphy bands 8, 12 and 16 Mc/s.
- b) As shown in the following table, eight channels in these bands, each with a high priority were in use before 1940.

Maritime Radiotelegraphy Frequencies - Scheveningen-Radio PCH			
Frequencies (kc/s)			Sharing
x) in use	Notified	Assigned by P.F.B.	
5 525	2. 1.1946	4 250	1) London, Anapolis, Summit, Guantanamo, Norfolk Va., Puget Sound Wash., Mare I. Cal., Kodiak, Adak, Guam, Lualualei, Tokyo, OKHA (Buenos Aires);
x 5 530	28.9 .1938		
5 535	2. 1.1946	6 404	
8 290	2. 1.1946	8 518 1)	2) Göteborg, Anapolis, Balbao, Mare I., Kodiak, Adak, Lualualei, Guam, Chollas Heights, Bombay;
x 8 295	12.11.1931		
8 300	2. 1.1946	8 562 2)	
8 460	2. 1.1946	8 646 3)	3) <u>Scheveningen notified</u> , Malta, Argentina, Buenos Aires, Noumea, Vizagapatam, Tiquisate;
x 8 465	28. 8.1939		
8 470	2. 1.1946	8 654 4)	
8 710	16.11.1946	12 768 5)	4) Choshi
x 8 715	27. 7.1939		
8 720	16.11.1946	12 779.5 6)	
x 12 320	16.11.1946	12 853.5 7)	5) Anapolis, San Juan, Summit, Mare I., Puget Sound, Guam, Lualualei, Adak, Kodiak;
12 760	2. 1.1946		
x 12 765	30. 3.1928	12 966 8)	
12 770	2. 1.1946	17 007.2 9)	6) Malta, Chatham Mass., (facsimile projected) Tsingtao (2 x);
13 155	2. 1.1946		
x 13 160	30. 2.1928	17 146.4 10)	
13 165	2. 1.1946	17 237.6 11)	7) Buenaventura;
16 585	2. 1.1946		
x 16 590	17.6.1936	17 261.6 12)	
16 595	2. 1.1946	22 539	8) London, Bombay, Puget Sound, Mare I., Chollas Heights;
x 16 995	2. 1.1946		
17 000	17. 6.1936	22 551	
17 005	2. 1.1946		9) Seattle;
x 17 270	17. 6.1936		
			10) Washington D.C., Westport Wash. San Francisco;
			11) London, Seattle, San Francisco, Chollas Heights;
			12) Anapolis, San Juan, Summit, Mare I., Puget Sound, Guam, Lualualei, Adak, Kodiak

Owing to the expected increase in traffic and in order to be able to ensure communication in cases of interference, an additional number of frequencies in these bands were notified after the war; the Bern List of 1947 thus shows in the 8, 12 and 16 Mc/s bands respectively 9, 7 and 7 frequencies, notified for the Netherlands, to be used by the coaststation Scheveningen-Radio (PCH).

- c) After careful reconsideration and taking into account the new possibility to utilize in some cases the 22 Mc/s band for traffic with ships, the requirements in the 8, 12 and 16 Mc/s band for assignment by the P.F.B. were limited to 4 channels in each of these bands.

A limitation, however, offered as a great contribution to international cooperation, which only can be maintained if full consideration is given to the important place the Netherlands have among the seafaring nations in general and in the field of maritime radiotelegraphy in particular.

- d) The official maritime traffic statistics of Geneva for the year 1949 are speaking in this respect a very clear language.

They show that the Netherlands, after world-war II having had to rebuild their whole maritime service with the restricted means available, have in Europe reached the second place after England as to the number of radiotelegrams received and transmitted.

Taking into account that these statistics give the whole traffic in all the telegraphy channels assigned to the coaststations of the countries concerned, thus including the traffic on the middle-frequencies, this place of the Netherlands still gains in importance with a view to the fact that over 90% of the total traffic of Scheveningen-Radio is handled in the 8, 12 and 16 Mc/s bands.

Radiotelegrams transmitted	France and Algeria	Netherlands	Great Britain and N. Ireland
1946	8 433	56 937	116 829
1947	12 806	77 276	145 221
1948	17 638	85 378	147 164
1949	21 238	85 876	156 187
Radiotelegrams received			
1946	47 142	113 120	439 686
1947	62 420	155 402	530 812
1948	71 649	167 512	587 531
1949	86 412	201 525	614 181
Total maritime traffic			
1946	55 575	170 057	556 515
1947	75 226	232 678	676 033
1948	89 287	252 890	734 695
1949	107 650	287 401	770 368

e) These results could only be obtained by an abnormal and outstanding effort of the coaststation itself and all the ships cooperating, notwithstanding the service was increasingly hampered in a most serious way by "newcomers" in the old PCH-channels, often resulting in an intolerable delay in the transmission of telegrams. The situation is getting worse.

f) It must be noted that in spite of many efforts to improve the situation by requesting the countries concerned to take account of the Netherlands priority, hardly any result in this direction was obtained.

With a view to this experience of the damaging effect of unreasonable sharing, the Netherlands Administration has serious objections to most of the frequencies in the 8, 12 and 16 Mc/s bands, assigned by the P.F.B. to the Netherlands.

g) The number of the channels asked being the absolute minimum for normal operation (provided each of them can indeed be used), the P.F.B. frequencies show in each of the 8, 12 and 16 Mc/s bands, practically only one channel that can be expected to give satisfaction.

The sharings for the other channels in these bands as indicated in the above table, clearly show, that, if the P.F.B. assignments were to be implemented, the situation for the Netherlands would in many respects be worse than it is even at the present time; without however the formal possibility to claim ancient rights.

h) Above was mentioned that in accordance with the Geneva statistics of 1949, the Netherlands were in Europe second in rank after Great Britain and Northern Ireland as to the maritime radiotelegraphy traffic handled.

However it reached this position already in 1946 and therefore it is worthwhile to make a comparison with two other European countries viz. Great Britain and France, as to the number of channels assigned respectively to Portishead and Agde/St. Nazaire, being the principal coaststations for handling the short-wave traffic in the public service.

i) In the table below is given the maritime radiotelegraphy traffic (on all wavelengths) in the years 1946, 1947, 1948 and 1949, for Great Britain and Northern Ireland, the Netherlands and France with Algeria, resulting in the following proportions :

	France and Algeria	Netherlands	Great Britain and Northern Ireland
1946	1	3.0	10.0
1947	1	3.1	9.0
1948	1	2.8	8.2
1949	1	2.7	7.2

The number of channels in the 4 - 22 Mc/s bands assigned to the public-service coaststations of these countries, are as follows :

	Agde and St. Nazaire	Scheveningen Radio PCH	Portishead
4 Mc/s	5	1	5
6 Mc/s	5	1	7
8 Mc/s	6)	4)	8)
12 Mc/s	5)	4)	8)
16 Mc/s	5)	4)	7)
22 Mc/s	6	2	7

- j) Comparison between these traffic-proportions and the number of channels in the bands from 4 - 22 Mc/s, strongly supports the statements of the Netherlands Administration, that the number of frequencies asked for Scheveningen-Radio is indeed the absolute minimum, especially as over 90% of the total traffic of the Netherlands is handled on short waves.

If however the comparison is extended to the quality of the channels as assigned by the P.F.B. to each of these three countries, the conclusion is evident that the Netherlands Administration sees no way to accept those of the frequencies in the most important telegraphy-bands of 8, 12 and 16 Mc/s, which do not guarantee a satisfactory operation.

- k) As stated, the foregoing refers only to the coaststation Scheveningen-Radio PCH.

Owing to unforeseen circumstances it is not yet possible to comment on frequencies allocated to the Netherlands Navy stations. As soon as possible additional comments, if any, will be forwarded.

IV) General Comments concerning International Police Commission Network

For the benefit of its participation in the work of the organization of the International Criminal Police the frequencies 3 593 kc/s (Region 1 Conference), 4 985.5 kc/s and a frequency in the band 6 765 - 7 000 kc/s (P.F.B.) have been assigned to the Netherlands.

At present among others the frequency 10 390 kc/s is in use, and it is necessary to have a frequency of the same Mc/s order at our disposal.

In the P.F.B. band Q (9 040 - 9 500 kc/s) the frequency 9 498.25 kc/s was assigned to many European countries for the purpose. The Netherlands Administration, therefore, requests to add the Netherlands to this International Police Commission Network.

Note : The detailed comments and some tables (in particular the table relating to the Aeronautical Fixed service) have been classified in a set of files, each of which refers to a given service, band or Region. These files are at the disposal of the Extraordinary Administrative Conference.

(58)

PHILIPPINES

(REPUBLIC OF THE)

Nº 58.1

30 May, 1950

Extension to fifteenth July requested for submission comments and corrections of P.F.B. lists on account of late receipt of same +

(59)

POLAND

Nº 59.1

30 June, 1950

Comments on : D, E and the whole of the draft list

Reference your circulars 20/45 and 20/59 and telegram 92/2 thirteenth June Stop Polish Administration has honour inform you that at meetings of PFB at Regional Conferences and Conferences for various services and at third and fourth sessions Administrative Council Delegates of Polish Administrations repeatedly expressed negative opinion concerning proposal to draw up new frequency list based on Atlantic City principles and pointed out its defects Stop In view of Polish Administration no new facts have arisen to cause any change in attitude previously taken and statements previously made by its Delegates +

(59) - 2 -

N° 59.2
C.A. Res. 200

14th February, 1951
(published in Notification N° 618)

Comments on: the whole of the draft list

In reply to your circular letter 9.6/764 of 14th October 1950 and to your telegram 157/18 of 18th November 1950, the Polish Administration declares that it fully agrees with the statement of the Union of Soviet Socialist Republics' Ministry of Postal and Electric Communications, as published in Notification N° 616 of 16th January, and wholeheartedly supports the attitude adopted by the Union of Soviet Socialist Republics' Administration Stop

Neither the P.F.B., the Region 1 Radio Conference, nor the International Administrative Aeronautical Radio Conference were guided by the spirit of international cooperation nor were the basic criteria which they adopted calculated to contribute to the drawing up of a new International Frequency List acceptable to all I.T.U. Members Stop The Polish Administration drew attention to this on many occasions through its delegates, pointing out that the 1939 Berne Frequency List was the only possible basis for drawing up a new Frequency List which would take into account the needs of all Members and the future development of radiocommunications, this being of special importance for Poland because of the losses suffered during two world wars Stop Contradicting the elementary principles of justice, the new draft Frequency List drawn up by the P.F.B. definitely favours the United States of America, the United Kingdom and France at the expense of the other countries which because of their area and population should be allotted frequencies several times more numerous than those assigned in the draft Stop

The plans prepared by the Region 1 Radio Conference and by the International Administrative Aeronautical Radio Conference are obviously in conflict with the provisions of the Radio Regulations and the decisions of the Atlantic City Telecommunications Conference Stop Our Administration has said more than once that, under these conditions, only the next Administrative Radio Conference was competent to establish the directives for drawing up a new Frequency List which would take into account the interest of all I.T.U. Members Stop As for the I.F.R.B., there are now no conditions to justify its existence as specified in Article 6 of the Convention Stop In seconding the statement made by the Union of Soviet Socialist Republics, we declare that in our actions we have always borne in mind the interest of all I.T.U. Members and we will continue to follow this principle by cooperating with all those countries which genuinely wish to draw up a new Frequency List acceptable to all Members Stop

We ask you to bring the foregoing to the notice of all the Members of the Union in the next Notification to be published by the General Secretariat +



PORTUGAL

No 60.1

13 June, 1950

Comments on : E, F and H.

I have the honour to forward to you herewith a 17-page document containing Portugal's remarks on the draft lists to be submitted for consideration to the Extraordinary Radio Conference which is to be held at the Hague next September.

REMARKS ON THE DRAFT FREQUENCY LIST

1. In accordance with Resolution 154 of the Administrative Council of the I.T.U., we are submitting the considerations we now think necessary on the draft frequency list drawn up by the P.F.B. from 15 January 1948 to 28 February 1950.
2. Portugal's position towards the P.F.B.
 - 2.1. During the first phase of the work of Committee 6 of the Atlantic City Conference (1947), the Portuguese Delegation could not agree with the organization of the P.F.B. on the lines finally adopted by the Conference.

This attitude was the consequence of our conviction that the compilation of a draft frequency list based on reasonable technical standards would be hampered by the presence of delegates from various countries. The P.F.B. would thereby take on all the characteristics of a conference, without having the powers a real conference would have and there would be the possibility of having to discuss conflicting opinions, with all the accompanying disadvantages and delays.
 - 2.2. We at that time favoured entrusting the compilation of the list to the I.F.B.B., a body whose members would act as the custodians of an international public trust.
 - 2.3. As the Atlantic City Conference did not adopt the above solution, we immediately gave all the collaboration in our power to the P.F.B., because we acknowledged - a position we still maintain - the imperative necessity of an orderly solution to the problem of frequency assignment by rational use of the spectrum to ensure the satisfactory operation of the basic radio services.
 - 2.4. The progress and outcome of the work of the P.F.B. seem to justify our original stand.

However, we shall continue to afford the same loyal collaboration during the Extraordinary Conference, trusting that it will successfully achieve the results that are expected of it.

3. Considerations on the work of the P.F.B.

3.1. There is no doubt that the P.F.B. had to replace the C.C.I.R. in the initial stages of its work by collecting a mass of technical data without which the execution of its mandate would have been impossible. In this way, the Board spent many months establishing a minimum of technical standards to serve as a basis for the new frequency list. The next stage was the application of these standards. Here, the Board was in many cases faced with the impossibility of applying them on account of the very many frequency assignments called for. To meet all the circuit requirements, the working groups of the P.F.B. were obliged to lower to a considerable extent the technical standards adopted by Committee 4.

Portugal views such a lowering of technical standards with grave misgiving, particularly since its effects on the general level of interference cannot be estimated without systematic tests to prove the practical expediency of applying such reduced standards.

3.2. In some frequency bands it proved impossible to draw up a draft list, despite all the consolidations and super-consolidations.

The successful outcome of the Extraordinary Conference - the production of a technically perfect list - depends therefore on the adoption of every device to reduce the number of frequencies for assignment, while meeting the real requirements of each country.

4. Possible ways of reducing the number of frequencies.

4.1. In the first place, the extremely high number of requirements submitted at Atlantic City seems to have resulted from different conceptions of how Form 1 should be filled in ; in some cases frequencies that would only be required in the distant future were included ; in addition, there existed at the time of the Conference exceptional circumstances that have since been completely changed or enormously attenuated.

We are convinced that a careful revision by administrations of their lists in a true spirit of cooperation would lead to a substantial reduction of requirements.

4.2. In some cases, the rules for calculating frequency complements have been very generously applied ; to be on the safe side, attempts have been made to obtain a maximum number of frequencies higher than that which practical operating experience has shown to be necessary. A comparison of the frequencies at present in use and the calculated complements for certain circuits will show this to be true. It will be observed that circuits for which the highest frequency at present in use is below the minimum required to avoid multipath effects have been regarded as high-speed automatic circuits ; in certain cases, the highest frequency is lower even than the LUF for any circuit that is not manual.

In other cases, circuits for which the lowest frequency in use is higher than the MUF at certain times of the days have been regarded as of continuous schedule.

A methodical analysis of these factors together with effective co-operation between countries might lead to an appreciable reduction in the total number of frequencies to be assigned.

4.3. The problem of intermittent circuits, in spite of the difficulties (which we do not wish to minimise), would repay for more thorough study and could mean considerable frequency saving.

Closer co-ordination inside each country might lead to arrangements for sharing traffic hours among many circuits operated intermittently.

Similarly, in other cases, arrangements can certainly be made between the various countries for frequency sharing in such circuits, without any great probability of interference, taking into account the special operating conditions of these circuits.

These operating conditions may allow of a smaller degree of protection for circuits operated intermittently.

4.4. We also believe that a greater saving in frequencies could be achieved, especially in the North Atlantic area, if a re-examination were undertaken of communications using either a direct circuit or a relay circuit, according to propagation conditions.

Whenever the order of frequencies to be assigned is the same for both circuits, the same frequency should be assigned to the relay circuit as to the circuit it replaces.

4.5. The problem of time-sharing between circuits of the same country or of different countries deserves more thorough analysis; considerable economies could be effected, while still maintaining the practical possibilities of carrying out the service.

Of the frequencies in a complement allotted to a circuit a distinction may be made between those corresponding to normal use and those needed for the transition periods. During such periods, when the schedule is more irregular on account of rapid changes in ionospheric conditions, it will very often prove possible to use indiscriminately more than one frequency in the complement.

In these cases, when the order of the frequencies is the same for both circuits, and when for a given period it corresponds in one of them to a normal working frequency and in the other, for the preceding or subsequent period, to a transition frequency, the same frequency could be allotted to both circuits, decreasing or even eliminating the separation between the probable periods of use of the frequency by the two circuits.

To do this, it would only be necessary to draw up rules giving priority for the use of the frequency to the circuit for which it is the normal working frequency. The rules would therefore be based on the relative importance of this frequency in the ensemble of the two complements.

4.6. The notion of circuit, indispensable for the preparation and maintenance of a technically acceptable list, should not be rigidly applied in all cases. If the idea of reception point be replaced by that of reception area, i.e. the area in which the reception of a frequency belonging to a given circuit is effectively protected, everything is to be gained by allowing this frequency to be used for transmission towards any point in this area, if all the other technical sharing conditions are retained.

This procedure will give greater flexibility in operation and thus decrease the number of frequencies required, especially in cases where one Administration operates various circuits whose reception points are not far apart.

5. Necessity for a revision of requirements.

In view of the preceding remarks, we believe that, in order to compile a list to meet the real requirements of each country, it is indispensable for administrations to take the initiative of studying the reductions that might be obtained by adopting the ideas mentioned in the preceding paragraphs, especially paragraph 4.

The quite fair method of work adopted by the P.F.B. is an indication that many fears will be set aside and that closer and more effective cooperation will be afforded by everyone.

If the above initiative is not taken, the Conference will find itself obliged to make reductions which, under these conditions, will be either arbitrary or spread out proportionately over the whole.

In the first case, the Conference will be faced with non-acceptance by countries whose basic radiocommunications would suffer heavily. In the second, it will meet with a formal objection by those countries which, like Portugal, submitted at Atlantic City only those requirements which corresponded exactly to their real needs, as a result of which the frequencies allocated to them by the P.F.B. constitute the minimum compatible with efficient operation of their radiocommunications.

6. Aeronautical Fixed Service.

6.1. The problem of aeronautical fixed service circuits has not been solved in the plans drawn up by the P.F.B.

6.2. This arises from the fact that the Board has had to work with data that are out of date for reasons which include the following :

a) instability of the exclusive aeronautical services, due to rapid development since Atlantic City ;

b) the taking over of certain military services by civil administrations after the war, which was still going on when the information that served as a basis for the plans was supplied ;

c) certain important changes in the distribution of world air lines brought about by the signing of airline agreements between various countries, the greater part of them during the last two years.

6.3. It is only quite recently that I.C.A.O. has been able to effect the coordination that is indispensable to the preparation of sufficiently stable plans. The P.F.B.'s attempt to take into account the partial results of this work that were available has not held to any practical achievement and has caused an exaggerated allocation of frequencies because, at the same time, there was no thorough overhaul of the requirements originally submitted by administrations.

6.4. Under these conditions, a revision of the lists of aeronautical circuit requirements is essential, either because the indications in the P.F.B. draft list do not, in many cases, correspond to the need of present-day operation or because of the belief that the acceptance of the service reorganization proposed by I.C.A.O. and based on rational technical principles will mean a substantial reduction in the number of frequencies to be assigned.

6.5. I.C.A.O. has adopted the term "network" for groups of circuits. Some of these groups actually are networks, others work on forking. The consolidation of the Portuguese aeronautical circuits received the generic name of "network 906" in P.F.B. document No 688.

Though some of these circuits work on networks, others use duplex. It is therefore essential to make the necessary amendments to the draft frequency list.

These amendments are given in Annex I.

7. Analysis of the allocations to Portuguese circuits.

7.1. As it may be proved in practice that the separations between adjacent channels are inadequate and since, as the Board's draft list now stands, it is impossible in practice to assess the frequency complements allocated to circuits which share in time one or more frequencies with Portuguese circuits - and they must be assessed if we are to draw up a schedule for each frequency - we have been unable to make a thorough study of the allocations to all the Portuguese circuits.

7.2. Thus, the comments in Annex II refer only to cases where the special conditions of sharing or separation between adjacent channels are so unfavourable that a glance will show the impossibility of operating the Portuguese circuits concerned.

7.3. The difficulty of knowing what frequencies are assigned to a given circuit of which we have spoken in 7.1. above, prompts us to suggest that the P.F.B. should prepare, before the opening of the Extraordinary Conference, a table of circuits of all countries giving the frequencies assigned to each circuit in both the contained and non-contained plans and place it at the disposal of the Conference.

8. Amendments to the P.F.B. draft lists.

Some typographical errors affecting Portuguese circuits have been noticed in the P.F.B. documents containing the frequency list drafts ; Annex III lists the necessary corrections.

9. Frequency List of the Administrative Conference for Region I.

Annex IV contains two observations on the frequency list of the Conference for Region I concerning Portuguese circuits.

Note : The detailed remarks and comments contained in the Annexes I, II, III and IV of the previous letter have been classified in a set of files, each of which referring to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

No.60.2
C.A. Res.200

23 December 1950.

Comments on: A, B, C, E, F, G, and H.

I have the honour to forward herewith a 6-page document containing the Portuguese observations drawn up in accordance with Resolution No.200 of the Administrative Council (5th Session).

OBSERVATIONS DRAFTED IN ACCORDANCE WITH RESOLUTION No.200
OF THE ADMINISTRATIVE COUNCIL

1. In accordance with paragraphs a) and b) of Resolution No.200 of the Administrative Council of the I.T.U., we are submitting the following comments on the various plans drawn up by the regional and service Conferences and by the P.F.B.
2. Before analysing these plans, we think attention should be drawn to the present position of high-frequency broadcasting. In spite of the efforts and the co-operation of various Administrations at the Mexico and Rapallo Conferences and during the work of the P.F.B. the preparation of a list of frequency assignments for high-frequency broadcasting stations was not possible.

This situation causes us grave misgivings. Because there are Portuguese territories in all parts of the world and many colonies of Portuguese people in other countries, a high-frequency broadcasting service is as essential for us as a domestic service for other countries.

In the absence of a modus vivendi to guarantee the efficiency of the essential high-frequency broadcasting services and if such efficiency cannot be achieved by the use of the frequencies in the bands allotted to broadcasting by the Atlantic City Conference, it is to be expected that frequencies in the bands allocated to other services will be used.

This situation will affect the decisions to be taken by the Extraordinary Conference in the frequency bands with which it will have to deal and for this reason the problem should be carefully reviewed in the light of all its possible consequences.

This same fact will quite possibly lead to situations identical with that which faced Portugal during the Cairo Conference and may, therefore, force us to make reservations similar to that which appears in the Final Protocol to the Regulations.

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3. Aeronautical OR plan

The plan's allocations to Portuguese stations are acceptable.

It should however be pointed out that the plan does not cover the requirements of Spain. The operation of the Spanish stations, without previous arrangement with the Spanish Administration concerning the frequencies they are to use, may rob the plan of any practical interest, especially, as far as we are concerned, in the lower frequencies.

We therefore regard it as indispensable that an arrangement should be made with Spain concerning the frequencies to be used by Spanish stations and that those frequencies should be incorporated in the plan.

4. Aeronautical R plan

The plan's allocations to the MWARA and RDARA which affect Portugal will be acceptable if the channels allocated to A3 telephony are not sub-divided into A1 telegraphy channels. We are greatly interested in the use of telephony instead of telegraphy in all ground-aircraft communications of the air traffic control service either on the major world air-routes or on the regional and domestic routes.

5. Maritime mobile radiotelephone service

The plan for allocating frequencies to radiotelephone coast stations drawn up by the P.F.B. is acceptable, in view of the limitations imposed by the excessive number of requirements.

6. Maritime mobile radiotelegraph service

The plan for allocating frequencies to radiotelegraph coast stations drawn up by the P.F.B. is a praiseworthy effort towards a fair distribution of the available spectrum-space among all users but it contains cases of sharing about which we feel serious apprehension.

For instance, the sharing of frequencies 8 462, 12 808.5, 12 993, 17 055.2 and 17 088.8 kc/s between Portuguese stations and English and French stations will cause serious interference, the extent of which cannot be estimated until the amount of traffic handled by the latter stations is known.

In our view, sharing possibilities of this kind can be assessed only by practical experience; this being so, the implementation of the maritime plan should be preceded or immediately followed by an experimental period. The results thus obtained would enable the plan to be modified or re-adjusted on the lines shown to be necessary by operating experience.

7. Region 1 plan

The allocation plan prepared by the Radio Conference for Region 1 (Geneva, 1949) is acceptable; we nevertheless insist on the solution of the two cases quoted in Annex IV to the remarks on the draft frequency list which we submitted with our letter of 13th June.*

The considerations in paragraph 3 above concerning the Spanish stations also apply to the Region 1 plan.

8. Plans prepared by the P.F.B. for the bands from 3950 to 27 500 kc/s

The Portuguese Administration is not losing sight of the motives for which the new frequency allocation table was adopted at Atlantic City and considers that every effort should be made to implement that table.

It should, however, be remembered that the spectrum space allotted to the fixed service between 3 950 and 22 000 kc/s by the Atlantic City table is only 70% as wide as it was in the Cairo table. If all the stations in the fixed service which are now working outside the Atlantic City bands were to operate in the new bands, the effect would be to increase the over-loading of those bands by some 43%.

If it be remembered that the fixed service is at present working under somewhat delicate conditions, it is to be expected that the quality of that service will deteriorate to a level that Administrations cannot accept - the Portuguese Administration, for one, since for us the long-distance fixed service is tremendously important.

The conclusion of all this must be that the resolutions for the implementation of the new frequency allocation table must be based on the principles laid down at Atlantic City, in other words, attempts must be made to assign frequencies so as to avoid mutual interference and not to decrease the quality of the service, which is somewhat unsatisfactory already.

As it is impossible to make a fresh start on the preparation of a frequency list, advantage should be taken of the enormous amount of work already done and the plans drawn up by the P.F.B. must be used.

In analysing these plans, we must draw attention to what we have already said in paragraph 7.1 of the remarks we submitted with our letter of 13 June* on the consequences of reducing technical standards in the P.F.B. working groups and the impossibility of assessing the efficacy of the allocations without knowing the frequency complements allocated to the circuits which share one or more frequencies in time with Portuguese circuits. We shall attempt to assemble as much data as possible so as to give a clear idea of our views on the

* Published under No. 60.1.

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matter. In the following paragraphs, we shall give our opinion on the assumption that the final technical standards adopted provide a service with a satisfactory minimum of efficiency.

In view of the principles on which the frequency complements were calculated, there would be no sense in adopting allocation plans for small parts of the spectrum with no continuity between the extreme frequencies in the series of plans adopted.

The P.F.B. has prepared contained plans for all the bands above 11 975 kc/s, except for the 15 450 - 16 460 kc/s band in which the available spectrum space was exceeded by only 10%. Below 11 975 kc/s, the P.F.B. did not succeed in drawing up contained plans in large portions of the spectrum.

Since 12 Mc/s may be regarded as a dividing frequency so far as the use of frequencies is concerned, the implementation of the Atlantic City table above 11 975 kc/s with the adoption of the P.F.B. plans could be envisaged.

The Portuguese Administration therefore believes:

a) that the Atlantic City allocation table should be adopted for the bands below 3 950 kc/s and above 11 975 kc/s, together with the results of the regional conferences, the Aeronautical Conference and the P.F.B., as soon as:

- i) administrations' objections to specific assignments have been met;
- ii) a contained plan has been prepared for the 15 450 - 16 460 kc/s band;
- iii) study has shown that the reduced technical standards adopted by the P.F.B. working groups will give satisfactory results.

As regards i) and ii), we think that the I.F.R.B. should be instructed to carry out the work and submit the results to the Conference.

The study mentioned under iii) should be carried out by the Administrations under the guidance of the I.F.R.B., which would also be entrusted with the compilation of the results.

b) that, in the 3 950-11 975 kc/s band, it should be the task of the Conference to study the most appropriate solution and, if necessary, to decide whether the implementation of the Atlantic City allocation table should be deferred for that part of the spectrum.

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9. Comments on individual assignments

We have nothing to add to the comments sent with our letter of 13 June, since the conditions under which the assignments to Portuguese circuits were analysed have not changed (see paragraph 7.1 of the comments attached to the letter of 13th June).*

* Published under No. 60.1.

FRENCH PROTECTORATES OF MOROCCO AND TUNISIA

N° 61.1

3 June, 1950

Comments of the French Protectorate of Tunisia on : E and H.

I have the honour to send you herewith remarks and proposals concerning the radio circuits operated by my Administration, the Security Services and the Highway Services.

The 22 cards enclosed contain comments on the following frequencies :

1) Post Office Circuits :

a) fixed service : 13 987.25 - 13 976.75 - 9 244 - 9 237.25 -
4 784.5 kc/s ;

frequency G : 3 775 - 3 784 - 3 377 - 3 264 kc/s ;

b) radiotelephone maritime service : 1 820 - 2 670 kc/s ;

2) Security Services Circuits :

3 215 - 3 279 - 4 933.5 - 5 008 ;

3) Highway circuits for Public Works :

3 254 - 3 320 - 3 387 - 3 713 - 3 716 -
3 884 kc/s.

As regards the P.T.T. circuits of Tunisia, I have the honour to inform you that I can only regard as provisional the deletion of the frequencies proposed for circuit N° 2 (Tunis - Paris - Algiers - Rabat - radiotelephony, 3 channels with side-bands) since my Office is planning to begin operation of this circuit in two years' time.

My Administration, therefore, reserves the right to use the necessary frequencies when they are required. On the other hand, I have nothing against the deletion of the frequencies of circuit 3 (Tunis - Paris : Baudot-Verdan).

The Security Services circuits at present need seven frequencies ; a reduction to 4, as proposed by the P.F.B., would hamper the efficient operation of these services. I am consequently requesting the allocation of 3 extra frequencies to be used in A3 with 0.4 kW power in the following bands :

1 frequency in the 5 730 - 5 950 kc/s band

1 frequency in the 6 765 - 7 000 kc/s band

1 frequency in the 9 775 - 9 995 kc/s band.

As regards the frequencies reserved for Tunisian mobile stations, the type of emission is to be either A1 or A3 indiscriminately.

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N° 61.2

8 June, 1950

Comments by the French Protectorate of Morocco on : C.

I have the honour to forward to you, enclosed, two copies of :

1. Observations submitted by Morocco relative to the frequency assignments made by the P.F.B. in the frequency bands which by the Radio Regulations have been allocated to coast stations between 4 and 23 Mc/s.
2. An additional list of requirements, also submitted by Morocco, in relation to the Geneva Plan for Region 1.

Note : The detailed remarks and comments annexed to the two previous letters have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

Additional detailed remarks and comments concerning French Protectorates of Morocco and Tunisia are shown among the remarks and comments submitted by France (see N° 32.1, 32.2, 32.3).

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Nº 61.3
C.A. Res. 200

14th December, 1950

Note : See letter from French Administration, Nº 32.4, stating that this Administration also represents the view of the Administrations of Morocco and Tunisia.

YUGOSLAVIA

(Federal People's Republic of)

No 62.1

29 May, 1950

Comments on : C and E.

Further to your letter 20/59 followed by the documents relating to the draft frequency assignments, we have the honour to forward the following observations :

Yugoslavia's frequency requirements, especially those for its international service, have not been adequately met even within the limits of the circuits already in use. For instance, the requirements of our press service Tanjug, working at present on 14 frequencies, have been completely overlooked.

The remainder of our requirements have been handled by the P.F.B. working groups with an entire lack of consideration for future relations between Yugoslavia and other countries, including those which have been given frequencies for their own relations with Yugoslavia. Here are some examples of links for which Yugoslavia has no frequencies : Sofia-Skoplje (5730-5950), Bucuresti-Beograd and Zagreb (12052), Stockholm-Beograd (7300-8195, 11400-11700).

Another example of the lack of attention given to Yugoslav requirements is the fact that the number of frequencies assigned for links between Yugoslavia and other countries is lower than the number of frequencies assigned to the same link operated from the other end.

Here are some examples : New-York-Beograd 8 frequencies, Beograd-New-York 6 frequencies ; Praha-Beograd 5 frequencies, Beograd-Praha 3 frequencies ; Bern-Beograd 3 frequencies, Beograd-Bern 2 frequencies.

We would also point out that since the lists of frequency requirements were delivered, the Yugoslav Administration has put the following circuits into operation : Beograd-Stockholm, Beograd-Paris, Beograd-Buenos-Aires.

In addition to these facts, we would ask you to take into consideration the following further remarks :

Although the difficulties in drawing up the plans in question imply prior consideration of existing circuits, planned circuits taking second place, the Yugoslav Administration holds that most of its future links should be placed on a level with existing circuits in countries which are economically further advanced than Yugoslavia.

During the war, destruction in Yugoslavia amounted in some cases to 90% of the country's material wealth, which meant another setback for a country that was already behind the others.

The new post-war economic and social order in Yugoslavia, however, inaugurated a period of considerable economic activity ; the percentage progress achieved is far above that of other countries.

Such great economic activity obviously entails the large-scale development of economic relations with other countries, including communications and especially radio communications.

This will mean new radio links between Yugoslavia and other countries, even those which at present do not recognize the necessity of a radio connection with Yugoslavia. Examples are links between Beograd and Amsterdam, Brussels, Frankfurt-am-Main, Istanbul, Cairo.

The same considerations oblige the Yugoslav Administration to maintain its frequency requirements for its internal relations. The extension of the territory, the geographical features of the land and especially the method of exploiting natural wealth (mines, forests, water-power, etc.) and industries, together with the meteorological service, mean a very wide-spread use of internal fixed and mobile radio communications. For these services, the P.F.B. working groups have proposed only 30 circuits in the 5730-5950 and 7300-8195 kc/s bands.

After receiving the documents concerning the frequency assignments, the Yugoslav Administration revised its frequency plan submitted to the P.F.B. (which moreover was submitted in a form based on a different sharing principle from that taken as a working basis for the P.F.B. working groups) and, after making the amendments necessitated by the general position, reached its final plan, which you will find attached.

In this revision, the Yugoslav Administration made allowances for the difficulties which the next P.F.B. Conference will have to face ; in basing its plan on the principles described above, it believes that it has kept within reasonable bounds.

On the maritime frequency plan, the Yugoslav Administration has the following observations to make :

The draft plan for the assignment of maritime frequencies drawn up by the P.F.B. in Geneva 1948/49 does not meet our requirements either in number or order of frequencies. That is why our Delegate in Geneva handed the P.F.B. a new list of frequencies for the Yugoslav maritime service, published in Booklet I of 15 February, 1950, page 313. Referring to your circular letter 20/59, we have the following remarks :

- a) we cannot possibly reduce our frequency requirements ;
- b) the power of stations in the 4 Mc/s band will be 1 kW ; range 1 000 km. ;
- c) the power of stations in the 6 Mc/s band will be 1-2 kW ; range 3 000 km. ;
- d) the other stations (8, 12-13 and 16-17 Mc/s) will have a power of 1-5 kW with world-wide range ;
- e) any of the frequencies required can be changed if its place in the corresponding band is maintained.

The Yugoslav Administration reserves the right, at the forthcoming P.F.B. Conference, to make any necessary amendment to its plan and states that it will not accept any plan for frequency-sharing which does not respect its legitimate interests.

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N° 62.2

24 July, 1950

In reply to your letter P.F.B. 13/74, of 16 June 1950, we have the honour to send you herewith our final frequency plan, on the forms used by the P.F.B.

The frequencies therein indicated have already been submitted to the P.F.B. as our requirements, on the Bern forms. This holds good for all except a few frequencies, which have just been notified to the International Telecommunication Union, and are indicated in the Observations column by "new requirement"; in general, we have taken our frequencies from the P.F.B.'s draft plan, whereas the new requirements are those indicated in column 1, under circuit numbers 16 and 18.

In the forms 1, we have shown the frequencies of the land mobile service, since we are of the opinion that they should not be given in forms 2. If that opinion is incorrect, we should be grateful if you would bear this remark in mind.

Note : The forms N° 1 and N° 2 annexed to the preceding letter have been classified in the files which are at the disposal of the Extraordinary Administrative Conference. For convenience in classification, the circuit numbers shown in these forms have been modified, particularly in regard to circuits 16 and 18, which in the P.F.B.'s files carry the numbers 616 and 618 respectively.

No. 62.3
C.A. Res. 200

18 December 1950

Comments on: A, B, C, D, E, F and H

In reply to your circular letter 9.6/764 of 14 October 1950, we have the honour to forward herewith our Administration's remarks on the draft new International Frequency List.

The frequency assignment plans already drawn up for the frequency bands below 4 000 kc/s are acceptable.

Frequency assignment plans for the maritime and aeronautical mobile services:

Our maritime mobile service needs one more frequency (1605 kc/s) for the coast stations Rijeka, Split, Zadar and Dubrovnik. Power of these stations 100 watts, type of emission A1, A2, A3.

For the aeronautical service, we need to be assigned the following extra frequencies:

8 942 kc/s for WT service R
10 095 kc/s or 11 265 kc/s for WT service OR and
11 247 kc/s for WT service R.

When the first frequency requirements were being drawn up, our aeronautical service plan did not cover long distance navigation and no frequencies were therefore expected to be required. However, new long distance relations, such as Beograd-Frankfurt and Beograd-Zurich have been opened and others are to follow. It is therefore absolutely necessary that the aeronautical service should have the frequencies we have mentioned.

Frequency assignment plans for 14 - 150 kc/s and 3 900 - 27 500 kc/s

Annex to document 702. Band 14 - 150 kc/s

We accept this draft.

Annex to document 704. Bands D and E (3 900 - 4 000 kc/s)

We accept this draft.

Annex to document 689. Band F (4 000 - 4 063 kc/s)

To satisfy our present requirements we asked for 9 frequencies in this band. The draft, however, contains no frequency for Yugoslavia. As Yugoslavia is a very mountainous country with many islands and its wire lines were destroyed during the war, there are a great many radiotelegraph stations for internal communication which cannot be replaced, in the near future, by wire.

Hence, we insist on a more equitable treatment of the requirements we submitted to the P.F.B., which were the very minimum. The above refers to both the bands which heads this paragraph and those which follow, in

which we are asking for frequencies for the fixed and mobile internal radiotelegraph services.

Consequently, we cannot accept this plan.

Documents 706 and 713. Maritime Band (4 063 - 4 438 kc/s)

We cannot accept this draft unless it covers our later requirements for our maritime service.

Annex to document 705. Band G (4 438 - 4 650 kc/s)

This plan proposes 4 frequencies only for our country, when we asked for 12. The frequencies we requested are necessary for the reasons mentioned in connection with Annex to document 689 and because of night working with countries in the European system (Berne, Brussels, London, Moscow). We are already operating on these frequencies. The frequencies requested for the press and maritime services are of very great importance to us.

Consequently, we cannot accept this plan.

Annexes 1, 2 and 3 to document 719. Bands H, I and J (4 750 - 5 060 kc/s)

In these bands, we asked for 16 frequencies and we have been assigned one only; in other words, our requirements have been ignored.

For this reason and for the reasons mentioned in connection with Annex to document 689, we cannot accept this plan.

Annex 1 to document 761. Band K (5 060 - 5 250 kc/s)

In this band, we asked for 10 frequencies and we have been given one only. The number of frequencies we requested are absolutely necessary for the internal radiotelegraph service and for communication with limitrophe countries (Albania) and especially for the needs of the meteorological service which is rapidly developing and already occupies 5 frequencies in this band.

We therefore cannot agree to this draft.

Annex 2 to document 761. Band L (5 250 - 5 450 kc/s)

In this band we require 17 frequencies, which are indispensable for night communication with European countries and the permanent internal service by day. The draft plan, however, does not even mention Yugoslavia. The recently organized Yugoslav meteorological service, for which we did not submit requirements to the P.F.B., is at present using 6 frequencies in this band. We consequently insist that it should be given an adequate number of frequencies.

In view of the above, we cannot accept this draft plan.

Annexes 3 and 4 to document 761. Bands M and N (5 450 - 5 950 kc/s)

We accept this plan.

Annex 5 to document 761. Band O (6 765 - 7 000 kc/s)

In this band we contemplated frequencies for our land mobile service for places situated outside existing communications where we are building large hydroelectric plants or exploiting mines and forests. Our requirements - 20 frequencies - are real ones, based on the importance of such works to our national economy. The plan proposes 8 frequencies for Yugoslavia and our meteorological service alone is already using 9.

Consequently, we cannot accept this plan.

Annex to document 718. Band P (7 300 - 8 195 kc/s)

In this band our requirements included frequencies for the fixed and mobile internal services, for communication in the European and extra-European systems and for the press service. 29 frequencies in all. The 11 frequencies proposed in this draft do not satisfy our real requirements, since planned circuits (Frankfurt, Tel Aviv, Ankara etc.) must be taken into account.

We therefore cannot accept this draft.

Annex to document 710. Band Q (9 040 - 9 500 kc/s)

We accept this plan.

Annex to document 715. Band R (9 770 - 9 995 kc/s)

All the observations we made in connection with Annex to document 718 apply also to this band. We insist on the 5 frequencies we demanded, even though the draft plan does not assign one single frequency to Yugoslavia.

Consequently, we cannot accept this plan.

Annex 1 to document 714. Band S (10 100 - 11 175 kc/s)

We cannot accept this plan which assigns no frequency to Yugoslavia, when we asked for 6, to cover our minimum requirements in this band.

Annex 2 to document 714. Band T (11 400 - 11 700 kc/s)

The one frequency contained in the plan cannot cover our requirements, since it can be used only for the press service and the other circuits mentioned in the list we submitted have not been covered.

Our Administration therefore cannot accept this plan.

Annex 3 to document 714. Band U (11 975 - 12 330 kc/s)

Since our transmitters in all bands are fairly low-powered, we demanded 5 frequencies, whereas the draft plan assigns only one to Yugoslavia. This single frequency cannot cover our requirements, since we are having considerable difficulty in effecting our communications with the 5 frequencies already being used by our service.

Annex 4 to document 714. Band V (13 360 - 14 000 kc/s)

The frequencies in this band have proved the most effective in practice for long-distance communication, especially with New York. We asked for 5 frequencies. The plan ignores our requirements and does not assign a single frequency to us.

We therefore cannot accept it.

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Annexes 1, 2 and 3 to document 708. Bands W, X and Y
(14 350 - 17 700 kc/s)

This draft, which proposes only 4 frequencies for Yugoslavia, is unacceptable to us, since even with the 20 frequencies we requested, our communications, especially with New York and Buenos Aires, cannot be entirely guaranteed.

Annex 4 to document 708. Band Z (18 030 - 19 990 kc/s)

The same remarks apply as for the other Annexes to document 708, and:

Annex 1 to document 711. Band aa (20 010 - 21 000 kc/s)

In these bands, we requested 14 frequencies and the draft plan gives us a single frequency which is totally inadequate to cover our real requirements.

Acceptance of this plan would gravely undermine our international communications, which it might even bring to a standstill, especially with the United States and the Argentine Republic.

Annexes 2, 3, 4, 5, 6 and 8 to document 711. Bands bb,
FX Aero Mobile R. cc, FX Aero Mobile OR. dd and ff
(21 750 - 24 990 kc/s and 26 100 - 27 500 kc/s)

We accept the draft plan.

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UKRAINIAN SOVIET SOCIALIST REPUBLIC

N° 63.1

22nd May, 1950

Comments on : A

In reply to your circular letter N° 20/20 of 10th February, I have the honour to inform you that the views held by the Telecommunication Administration of the Ukrainian Soviet Socialist Republic with regard to the matter raised by you were expounded by the Ukrainian Delegation at the 30th Plenary Meeting of the International Administrative Aeronautical Radio Conference, second session, Document Aer/2 N° 162 Stop These views have undergone no modification +

N° 63.2

22nd May, 1950

Comments on : C

In reply to your circular letter N° 20/30 of 2nd March, I have the honour to inform you that the views held by the Telecommunication Administration of the Ukrainian Soviet Socialist Republic on the point you raise have in no way changed Stop These views were expounded by the Ukrainian Delegation at the 32nd and 34th Plenary Assemblies of the P.F.B. +

N° 63.3

19th June, 1950

Comments on : D, E and the whole of the draft list

In reply to your circular letters Nos 20/45, 20/59 and telegram N° 92/2 the Delegation of the Union of Soviet Socialist Republics to the Provisional Frequency Board repeatedly declared that the Board was wrong in adopting the principles and methods it did adopt, it likewise indicated that it could not accept the list so prepared, the attitude of the Communications Administrations of the Union of Soviet Socialist Republics, the Ukrainian and Bielorussian Soviet Socialist Republics to the list which has been prepared remains unchanged, as to the plans prepared by Regional and Special Conferences, our attitude has been explained at sufficient length in the statements made by the Soviet Delegations at those Conferences +

№ 63.4
C.A. Res. 200

10 January, 1951
(published in Notification № 616)

Comments on the whole of the draft list

The Ministry of Postal and Electrical Communications of the Ukrainian Soviet Socialist Republic acknowledges receipt of your letter № 9.6/764 of 14 October 1950, and of your telegram 157/18, of 18 November 1950 Stop

In statements made to the Provisional Frequency Board, the International Administrative Aeronautical Radio Conference and the Administrative Radio Conference for Region 1, representatives of the Ukrainian Soviet Socialist Republic pointed out that the principles and methods on which the work of the conferences was based were faulty, as a result of which those conferences would never succeed - and have not in fact succeeded - in preparing a draft International Frequency List such as would be found satisfactory by all Members of the Union Stop This failure is attributable to the fact that, influenced by the Delegation of the United States of America, those conferences, in the course of their daily work, overlooked the vital need of international collaboration and of respect for the interest of other countries Stop One of the major reasons of this failure is that no account was taken of the 1939 Berne Lists, which constitute the only reasonable basis on which a List might be prepared Stop Study of the drafts submitted is sufficient to show that the List has been drawn up in the interests of the United States of America, Great Britain and France, without regard to the interests of the Union of Soviet Socialist Republics and other countries Stop According to the P.F.B. draft, the United States of America are to obtain more than 17 % of all frequencies, while the Union of Soviet Socialist Republics (including the Ukraine and Bielorussia) gets no more than 4.1 % Stop The number of frequencies allotted to China, Albania and other countries is inadequate Stop The Aeronautical Conference found a similar solution for the problems with which it was confronted, by allotting 50 % of the R frequencies to the United States of America for the "Major World Air Routes", the interests of other countries being overlooked Stop The decisions adopted by the Region 1 Conference are detrimental to the interests of the countries in that Region, and its decision to allocate the band 1 900 - 2 000 kc/s for Loran stations belonging to the United States of America (and causing grave interference to the fixed and mobile services of the Region) is illegal Stop The drafts prepared cannot be taken as a basis for the work of the Extraordinary Administrative Radio Conference, since, contrary to what was laid down at Atlantic City, they do not take account of the interests of all countries Stop This being so, there is no reason to call upon the I.F.R.B. to perform duties of which no mention is made either in the Convention or in the Radio Regulations Stop The Ukrainian Administration is therefore of the opinion that problems relative to the preparation of the new International Frequency List ought to be referred to the next Administrative Radio Conference Stop We would draw the attention of all countries to the fact that adoption of a faulty draft list would mean a gross breach of the Atlantic City decisions and might lead to the desorganization of essential telecommunication services Stop

I would request that the above statement be published in the next notification to be published by the General Secretariat of the I.T.U. +

(64)

SOUTHERN RHODESIA

No 64.1

21st August 1950

Comments on : E, F and H

With reference to telegram C.P.F. 5/896 relating to the frequency lists of Southern Rhodesia, I have to forward a complete frequency list for services in the frequency range 3 000 - 27 500 kc/s covering fixed service bands only.

Further lists for broadcasting services in the 3 000 to 10 000 kc/s range and additional fixed services in the 2 000 to 3 000 kc/s range will be submitted shortly.

Note : The frequency lists received with the above letter are drawn up in the same way as the draft of the New International Frequency List prepared by the P.F.B.. They show an extract of the P.F.B. assignments made for Southern Rhodesia and give, in addition, a number of frequencies which have not been assigned by the P.F.B.

The information received from Southern Rhodesia has been dealt with as follows :

- a) Modifications which Southern Rhodesia thinks should be made in the P.F.B. plans are published in the lists of detailed comments.
- b) Frequencies not appearing in the P.F.B. plans are published in the lists of requirements submitted under Section 16.

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No 64.2 (received 11.12.50)
C.A. Res. 200

Comments on : the whole of the draft list

Your CQ 207 157/18 Provided that this Administration's requirements as indicated in frequency assignment plans for frequency bands below 4 000 kc/s and band 4 000 - 27 500 kc/s with additions and corrections submitted are retained no comments offered (a) and (b) additions or revisions will be supplied separately +

(65)

ROUMANIAN PEOPLE'S REPUBLIC

N° 63.1

22 July, 1950

Comments on : D, E and the whole of the draft list

Reference your telegram 92/2 and your circular letters 20/45 and 20/59 Stop We remind you that the Delegation of the Roumanian People's Republic on the P.F.B. has repeatedly drawn attention to the impossibility of drawing up an international frequency list on the basis of the working methods and principles adopted by the Board Stop The position of our Administration as regards this question has not changed Stop Our views on the work and results of the Administrative Radio Conference for Region 1 and of the Special Conferences were also expressed by the Delegation of the Roumanian People's Republic at those Conferences +

(65) - 2 -

No 65.2
C.A. Res. 200

26th February, 1951
(Published in Notification No 620)

Comments on : the whole of the draft list

With reference to your circular letter No 9.6/764, of 14th October 1950, and to circular telegram No 157/18 of 18th November 1950 (Notification No 613, page 2), the Roumanian People's Republic informs you that it wholeheartedly supports the views expressed by the Ministry of Postal and Electrical Communications of the Union of Soviet Socialist Republics, as published in your Notification No 616 of 16th January 1951, page 4 Stop

Within the Provisional Frequency Board, at the Administrative Radio Conference for Region 1, and at the International Administrative Aeronautical Radio Conference, the Delegation of the Roumanian People's Republic showed that the draft plans prepared by those conferences, based as they were on inequitable principles which took no account of the requirements of a majority of Union Members, could not serve as a basis for the new Frequency List Stop One of the main causes of this setback is the fact that Berne List of 1939 was not taken as a basis for discussion - a List which has stood the test of practice and might provide a foundation for the new List Stop

The Administration of Posts and Telecommunications of the Roumanian People's Republic emphasizes that the draft prepared by the Provisional Frequency Board allotted to the United States of America, the United Kingdom and France 39% of all frequencies, no less than 17% of them to the United States of America; such a plan would desorganize telecommunication services with all the grave consequences that would ensue Stop

Hence the Administration of Posts and Telecommunications of the Roumanian People's Republic considers that these drafts cannot serve as a basis for discussion, or even as working documents, for the forthcoming Extraordinary Administrative Radio Conference, and that the work undertaken by the I.F.R.B. in preparation for that conference is irregular and purposeless Stop The Administration of Posts and Telecommunications of the Roumanian People's Republic repeats what it has already said in its telegram No 206390 of 27th September 1950, namely, that only the ordinary radio conference is competent to solve the problems arising from changes in the Radio Regulations, and to draw up a Frequency List which will prove acceptable for all Members of the Union Stop

Kindly bring this statement to the notice of all Members of the Union +

UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND,
AND COLONIES, etc. OF UNITED KINGDOM.

No 66. 1

22 July, 1950

Comments on: A,C,D,E,G,H,I,J, and K.

I have the honour, by direction of the Postmaster General to refer to your Circular telegram of the 12th June and to forward herewith, in accordance with the provisions of Resolution No 154 adopted by the Administrative Council at its 4th Session, the comments of the Administrations of the United Kingdom and the United Kingdom Colonies on the draft frequency assignment lists to be considered by the Extraordinary Administrative Radio Conference.

2. Enclosed are six copies of each of three documents
 - a) A memorandum containing a general commentary on the acceptability to the United Kingdom and United Kingdom Colonies of the draft plans prepared by the various planning bodies.
 - b) A schedule of comments on definitely unacceptable assignments to stations in the United Kingdom in the draft plans prepared by the P.F.B. ("contained" plans only) and the Region 1 Conference. The comments are arranged in frequency order, and to facilitate reference, the transmitting station and circuit numbers with which each frequency assignment is associated are given.
 - c) A similar schedule in respect of United Kingdom Colonies and Stations Anglaises, and including comments on the relative assignments in the plans prepared by the Region 3 Conference (in the African Plan there are no assignments which appear, at this stage, to be unacceptable).
3. Only "contained" draft plans have been examined in detail, and the absence in the schedules of comment regarding proposed sharing or additional consolidation contained in the "extended channelling" plans does not imply the agreement of the United Kingdom or the United Kingdom Colonies to the sharing and consolidation arrangements contained in those plans.
4. The detailed comments now offered are made on the draft plans as published and can therefore be regarded as preliminary only, and will necessarily have to be reconsidered in the light of the comments of all other Administrations when known. In particular, so far as these plans prepared by the Provisional Frequency Board are concerned, the comments have been made on the assumption that those Administrations which indicated at the Board that they would continue to use all their existing frequencies, will, in fact, conform with any plans that may be agreed by a majority. If this assumption proves to be wrong then the comments now offered will require major amendments.
5. I have to add that further comments may be made at the Extraordinary Conference in the light of a more detailed examination of the draft plans and the circumstances obtaining at that time.
6. Detailed comments in respect of assignments in the plans of the P.F.B. and of the Region 1 Conference to stations in the British Zone of Germany will be forwarded as soon as possible.

(a) General comments of the United Kingdom and the United Kingdom Colonies on the draft frequency assignment plans prepared by the various frequency planning bodies in accordance with the Atlantic City Resolution relating to the preparation of the new International Frequency List.

1. Region 1 Administrative Radio Conference.

The Regional Plan is generally acceptable as far as the United Kingdom and United Kingdom Colonies are concerned, subject to adjustments in some assignments to allow for equipment limitations. This conclusion is based on the assumptions that all of the frequencies which are provided for continuous operation in the Plan will not be used, and that, of those that are used, many will operate intermittently owing to the nature of their traffic. The United Kingdom and the United Kingdom Colonies are prepared to implement the Plan and would hope to resolve any difficulties that might arise in practice by negotiations in the ordinary way.

2. Committee of Countries in Region 1 outside Europe.

The "African Plan" is satisfactory to the United Kingdom Colonies, subject to adjustments in the frequency assignments proposed for certain of the Colonial coast stations concerned, whose equipment limitations may preclude acceptance of the assignments provided for them in the Plan.

3. Region 3 Administrative Radio Conference.

As far as the United Kingdom Colonies are concerned, the Plan is generally satisfactory, subject to adjustments in some assignments to suit the equipment concerned.

4. Region 2 Administrative Radio Conference.

The work of co-ordinating, where necessary, (in accordance with the provisions of Resolution No 1 adopted by the Region 2 Conference) the lists of frequency requirements of United Kingdom Colonial stations in the Region falling in the bands 10 - 14 kc/s and 150 - 4000 kc/s is proceeding; lists have not yet been received from some countries in the Region, however, and it seems very doubtful whether fully co-ordinated lists (particularly for the two bands 415 - 535 kc/s and 2000-4000 kc/s) will be prepared by all countries concerned before the Extraordinary Administrative Radio Conference. The Resolution of the Region 2 Conference provided that Administrations should submit their lists of co-ordinated requirements ninety days before the Special Conference. As this was not possible in the case of the United Kingdom Colonies in Region 2, complete lists, including un-co-ordinated requirements, have been submitted.

5. International Administrative Aeronautical Radio Conference.

The frequency assignment plan for the aeronautical mobile "off route" service, prepared at the first session of the Conference, is considered generally satisfactory as far as it concerns the United Kingdom and United Kingdom Colonies.

6. High Frequency Broadcasting Conference.

It is not possible to draw firm conclusions about the prospects of the preparation of acceptable plans in the high frequency broadcasting field.

7. P.F.B. - High Frequency Maritime Plans.

The draft telegraphy plan for coast stations, as it stands, cannot be regarded as satisfying the minimum requirements of the United Kingdom and United Kingdom Colonies. The earlier draft plan set out in P.F.B. Document 578 was far more acceptable but has been degraded by the inclusion of additional requirements, the rearrangement of certain assignments and the notification of the "derogation" requirements set out in P.F.B. Documents 706 and 713. The earlier plan appeared to be based on a reasonable compromise between the technical principles adopted by the Board and operating experience and hence to be a plan which would probably have given general satisfaction under normal operating conditions. The draft telephony plan for H.F. Maritime Services does not meet the minimum requirements of the United Kingdom and United Kingdom Colonies. It is considered, however, that the draft plan provides a basis for discussion.

8. P.F.B. - 14 - 150 kc/s Band.

Although there are a number of unsatisfactory assignments in this plan, particularly in respect of important maritime requirements, it is believed that a satisfactory plan, based on the present draft, can be produced. A number of assignments in the draft plan contravene the Atlantic City Radio Regulations, paragraphs 111, 113, 115 and 741 and these assignments should, it is considered, be amended.

9. P.F.B. - Fixed Services.

Examination of the reports of the P.F.B. shows that very few frequency assignment plans have been produced for that part of the spectrum between 4 and 7 Mc/s. A careful study has been made of the plans which have been produced, but not one plan is acceptable either to the United Kingdom or to the United Kingdom Colonies. The most prevalent defects are :

- a) consolidation beyond that provided for in the proposals submitted to the P.F.B. for the United Kingdom and United Kingdom Colonies ;
- b) the assignment of frequencies likely to suffer intolerable interference from co-channel and adjacent channel assignments ;
- c) inadequate frequency separation given to transmission frequencies and reception frequencies in the same locality.

Note : The detailed remarks and comments contained in the documents (b) and (c) mentioned in paragraph 2 of the previous letter have been classified in a set of files, each of which referring to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

No 66.2
C.A. Res. 200

13 December, 1950

Comments on : A and E (aeronautical fixed assignments)

I am directed by the Postmaster General to refer to request N° 1 of Resolution N° 200 adopted by the Administrative Council at its Fifth Session and to circular telegram N° 157 of the 18th November from the Secretary General of the I.T.U. about the submission of comments on the frequency assignment plans.

In a letter of the 22nd July, 1950* from this Administration to the Secretary General of the I.T.U. were enclosed copies of :

- a) a memorandum containing a general commentary on the acceptability to the United Kingdom and United Kingdom Colonies of the draft plans prepared by the various planning bodies,
- b) a schedule of comments on definitely unacceptable assignments to stations in the United Kingdom in the draft plans prepared by the P.F.B. ("contained" plans only) and the Region 1 Conference.
- c) a similar schedule in respect of assignments to stations in the United Kingdom Colonies and to "Stations anglaises" and including comments on the relative assignments in the plans prepared by the Region 3 Conference (in the African Plan there were no unacceptable assignments).

These comments remain valid ;

As regards a) this Administration has no amplification to make.

As regards the frequency assignment plan for the aeronautical mobile "off-route" service (which was not previously commented on by this Administration), there are no definitely unacceptable assignments, but this Administration will find it necessary to take advantage of the provisions of Part I, Section II, Article I, subsection 1, paragraph 3), of the Final Agreement of the International Administrative Aeronautical Radio Conference (Geneva 1948-1949) in order to meet all commitments. These references to the aeronautical mobile "off-route" plan apply also to assignments to stations in the United Kingdom Colonies and to "Stations anglaises".

I am to enclose six copies of a schedule setting out comments on definitely unacceptable assignments in the draft P.F.B. plans to the Civil Aviation H.F. fixed services of the United Kingdom Colonies and Stations Anglaises; these will no doubt be associated with the schedules of comments forwarded to the Secretary General on the 22nd July, 1950*.

*

Letter published under No. 66.1

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Six copies of a schedule setting out detailed comments in respect of definitely unacceptable assignments in the draft plans to stations in the British Zone of Germany are also enclosed herewith.

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

(68)

SWEDEN

N° 68.1

3rd August, 1950

Comments on : A, B, C, D, E, F and H.

With reference to the Resolution adopted by the International Radio Conference, Atlantic City, 1947, relating to the preparation of the New International Frequency List and to your circular letters N° 20/26 of the 10th February, 1950 ; N° 20/30 of the 2nd March, 1950 ; N° 20/45 of the 16th March, 1950 ; N° 20/59 of the 6th April, 1950 ; N° 20/72 of the 28th April, 1950 ; and N° 20/73 of the 1st May, 1950, as well as to our letter of the 13th June, 1950, we have the honour to send you herewith our observations and proposals regarding the frequency lists referred to in the above-mentioned circular letters.

Observations and proposals by Sweden regarding the draft new International Frequency List referred to in the Resolutions adopted by the International Radio Conference, Atlantic City, 1947, and in the circular Letters N° 20/20, 20/30, 20/45, 20/59, 20/72 and 20/73 from the General Secretariat of the International Telecommunication Union.

1. Geneva Plan for Region 1.

With regard to this plan Sweden has no proposals to make at the moment with the exception for a few formal corrections listed in Appendix 1. We reserve, however, the right in accordance with the Final Acts of the Administrative Radio Conference for Region 1, Geneva 1949, page 236, to submit certain amended or additional requirements at the time of the Extraordinary Administrative Radio Conference scheduled to take place in the Hague this year.

2. List of Frequency Assignments to stations of the Aeronautical Mobile OR and R Service. (Ref. Circular Letter N° 20/20).

Sweden has no observations or proposals to submit at the moment with respect to those lists.

3. Draft of the New International Frequency List for the band 14 - 150 kc/s. (Ref. Circular Letter N° 20/45).

Sweden considers that the channel spacing of 350 c/s is too small. In the cases of the assigned frequencies of 40.40 kc/s (Varberg/Karlsborg) and 48.80 kc/s (Karlsborg), the adjacent channels are left unassigned, and we thus have no observations to make regarding these two assignments as long as the adjacent channels remain unassigned.

In order to avoid interference to a Decca system working on the frequencies 88.516 kc/s, 118.021 kc/s and 132.774 kc/s and used for the surveying of the waters bordering on Sweden, we propose that the following amendments be made in the draft list: the frequency 89.05 kc/s should be assigned to Roma, now on 93.95 kc/s, and this frequency, 93.95 kc/s, should be assigned to Kaunas, now on 89.05 kc/s. Furthermore, Kamskoe Oustie should be given the frequency 130.70 kc/s instead of 133.15 kc/s.

The draft plan for the band 14 - 150 kc/s may serve as a basis for discussions at the Extraordinary Conference. It should be reviewed in order to avoid interference between adjacent channels and in order to take into consideration the new requirements submitted before the opening date of the Extraordinary Conference. The creation of adequate provision for the future development of new radio services and the expansion of existing services should also be considered.

4. Draft of the New International Frequency List for the bands allotted exclusively to the maritime mobile service between 4 and 23 Mc/s. (Ref. Circular Letter N° 20/30).

Regarding the telegraph plan we have the following observations to make.

The reduction of the service range in the 6 Mc/s band to 3000 km and in the 8 Mc/s band to 6000 km or even less cannot be accepted by Sweden. In fact, the 8 Mc/s band is very important for our long distance service

to ships in the Atlantics, in the Indian Ocean, in the Australian, Indonesian and Chinese waters, etc. During certain long periods of the day and of the sunspot cycle the 8 Mc/s band is the only one that can be successfully used for correspondence with ships in the above-mentioned waters. For Gothenburg, on 8498 kc/s, we cannot accept sharing with the Australian highpower station Darwin, as the latter station, which is working continuously, will certainly cause serious interference to our maritime mobile service.

With regard to the telephone plan we must point out that only one channel in each band has been assigned to the shared use of Norway and Sweden. As Denmark has announced no requirement of frequencies for its maritime mobile telephone service, also a great part of the Danish traffic will be handled by the Norwegian and Swedish coast stations. As the number of calls and installations of radiotelephone equipment in ships is great and permanently increasing the use of a common frequency for the Norwegian and Swedish channel will be very difficult. To this is to be added that in many cases the sharings with other stations proposed for the Norwegian/Swedish telephone channels are entirely unacceptable, as for example in the 8 Mc/s band where among others a sharing with seven 5 kW stations in India is proposed ; in the 13 and 22 Mc/s bands where sharings with Australia, 1 kW, are proposed and in the 17 Mc/s band where a sharing with Argentina, 3 kW, is proposed.

After a close study we have found that if the draft plans should be carried into effect, this would not allow of the continued operation of our maritime mobile service without harmful interference.

We are, however, fully aware of the great difficulties of satisfying all requirements and agree that the above-mentioned draft plans for the coast stations are a valuable basis for discussions at the Extraordinary Conference.

5. Draft frequency Assignment Plans prepared by the P.F.B. for the bands under its jurisdiction not covered by the draft Frequency Assignment Lists sent with Circular Letter N° 20/30 and 20/45. (Ref. Circular Letter N° 20/59.)

5.1. Observations and proposals concerning frequencies assigned to Sweden for its fixed international circuits for A1/F1, A3 and A4. (Excluding circuits for fixed aeronautical service.)

After engineering the circuits in question (i.e. those for which requirements were submitted before 25th February 1948 and those circuits projected to be in use before 1st September 1949 and for which requirements were submitted before 10th April 1948) in accordance with the technical principles and rules adopted by the P.F.B., Sweden reduced its frequency requirements by 25 % by consolidation in conformity with the recommendations of the P.F.B. Such consolidation could only be made under the condition that the use of the different specific frequencies was made more flexible than was necessary when applying the strict rules for engineering the frequency complement for each separate circuit. During the studies of the draft lists the correctness of this view has been further confirmed.

5.1.a) Observations regarding the number of channels assigned to Sweden in the draft lists.

A detailed study of the draft lists has shown that the number of frequencies assigned to Sweden between 3.9 and 27.5 Mc/s for the A1/F1, A3 and A4 circuits mentioned under 5.1. would not be sufficient even under the provision that all frequencies assigned to Sweden in the extended plans for the bands P, T and X were made available and furthermore also all the Swedish consolidated requirements in the bands K, L, M, N and O were assigned to Sweden.

The compression of the Swedish consolidated requirements made by the P.F.B. has namely gone too far in certain bands. We mention especially the extended draft plan for band P. Here two more channels are required for A1/F1 circuits. One of them could possibly be in the Q band and the other in the O band. The assignment of a common frequency for the circuit to Tanger and a fixed aeronautical circuit as well as for a fixed aeronautical net is not acceptable.

In the R band we need an additional frequency to be used separately by the meteo service. The proposed sharing of the same frequency between the meteo service and the Swedish commercial circuits to South America and Asia is not possible. In this band an additional frequency for the New York A1/F1 circuit is also required.

Another channel in the T (or S) band is necessarily required to carry out the Swedish A4- and PTS-service. The proposed simultaneous use of the same frequency for the A4/PTS-service and the Swedish A3-circuit to New York is not possible due to the traffic load on the telephone circuit.

In the band X it is proposed to use the same block of frequencies for an aeronautical fixed circuit and commercial A1/F1 circuits. This common use is not possible, and a separate channel is necessary for the aeronautical circuit.

5.1. b) Observations regarding the proposed sharings between Swedish and other circuits.

The simultaneous use of the same frequency for Swedish and other circuits are proposed in many cases. A study of the different assignments has shown that the protection ratios as a rule are 20-25 db, which also is in accordance with the reports from different working groups where it is stated that protection ratios of 20 to 25 db have been used for high quality circuits when making the draft lists. Sweden considers those values far too low and draws attention to the fact that a value of 25 db is considered necessary for the allowance for fading only when using diversity reception. Thus no consideration has been taken of the other factors e.g. the protection ratio when the signal strength of the wanted and unwanted stations are stable and the allowance for fluctuation.

Non-simultaneous sharings are also proposed in many cases, which necessarily means that efforts to conclude special administrative agreements in most of those cases have to be done.

5.2. Observations and proposals concerning frequencies assigned to Sweden for fixed international circuits for aeronautical service.

In the P.F.B. Document No 688, Annex No 9, page No 1, the fixed aeronautical circuit Prestwick-Stockholm, Ref. No 901, is indicated as a duplex network. In the draft list only one set of frequencies has been assigned to this duplex circuit whereas two sets are required.

In the same Document, Annex No 9, page No 1, the network Shannon-Stockholm-Iceland-Stavanger, Ref. No 952, is also indicated as a duplex network. In the S band, where two frequencies are requested for this network, only one frequency has been assigned.

5.3. Observations and proposals regarding frequencies assigned to fixed domestic radio circuits.

Sweden has very few circuits of this kind. In fact, there are only two duplex circuits of this kind in the original requirements. Two simplex circuits are however included in our requirements, filed after 10th April 1948. We may have to request frequencies for additional circuits before the opening date of the Extraordinary Administrative Conference.

5.4. Observations and proposals regarding frequencies assigned to land mobile circuits.

Also for this service Sweden has very few requirements. We only request frequencies for three base stations with a total of 5 frequencies, four of which are in the regional band and thus only one in a band dealt with by the P.F.B. i.e. the L band. Further requirements are however anticipated.

5.5. Observations regarding omissions and incorrectnesses.

In the Annex to Document 705 - 2nd edition, section 1., the circuit FIK 27 A has been omitted. This circuit should be included and reception provided for in New York.

In Document 714 - 2nd edition, page 3, the following corrections shall be made :

With regard to IK 13 the sentence : "Second frequency deleted by National Member" shall be deleted and rightly replaced by : "De-consolidated from IK 69 by working group". Also for IK 69 the sentence : "Second frequency deleted by National Member" shall be deleted and replaced by : "De-consolidated from IK 13 by working group".

5.6. Conclusions.

Sweden cannot accept the draft plans mentioned under this paragraph 5 as a real basis at the Extraordinary Conference for the preparation of the new International Frequency List for the following reasons :

- a) The compression of the consolidated Swedish requirements made by P.F.B. both in contained and extended plans has been too excessive.
- b) The proposed simultaneous use of the same frequency for Swedish and other circuits are in most cases based on protection ratios of 20-25 db, which is unacceptable for machine speed telegraphy circuits, for facsimile, p.t.s. and radiotelephone circuits extended to land lines.
- c) There is a great lack of uniformity in the principles and methods used by the different working groups.

6. List of Frequency Requirements to be included in the band K, L, M, N and O. (Ref. Circular Letter No 20/72).

With regard to this list we would make the following remarks.

In Annex 2 to Document 761 the consolidated requirement FIK 1, 2, 53, 23 and 15 has been omitted. Of this requirement FIK 1, 15 and 23 has been transferred to Band I and compressed with requirement for IK 24 from H band. We cannot accept this as the IK 23 is an auroral circuit where it is important to work on frequencies as close as possible to the MUF.

7. Frequency requirements presented between 25th February 1948 and 1st April 1950. (Ref. Circular Letter No. 20/73).

Sweden has no comments to make with respect to this list.

8. Special remarks.

8.1. In some cases P.F.B. has applied the method of "Notification" of frequencies. It has thus anticipated a procedure mentioned in article 11 of the Radio Regulations, an article which cannot come into force before the date of approval of the new international frequency list. By the fact of adopting the procedure of notification it is admitted that harmful interference is foreseen. For our part we are opposed to those notifications made on frequencies assigned to Sweden (e.g. in the maritime mobile telephone plan on the frequency of 8754.7 kc/s etc.). We further oppose the notifications made in the P band (Appendixes 1 and 2 to Annex to Document 718 - 2nd edition) and the notification of land mobile stations in the P band, which is exclusively allotted to the fixed service and for which P.F.B. has found it impossible to make a contained draft plan for the fixed stations. Under such circumstances it is not appropriate to notify frequencies for other services in this band.

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As a principle we cannot agree to notifications in Document 713, where fixed stations and one base station have been notified in bands allotted exclusively to Aeronautical mobile service R and OR, Standard frequency, Broadcasting, Maritime mobile and Amateurs.

The application of this notification method means in reality only a continuation of the existing state of affairs.

8.2. The figures in column 11 in the draft lists are in most cases misleading as regards frequencies assigned to Sweden. The figures indicate the number of frequencies assigned to the circuit in question when originally engineered in accordance with the rules for frequency complements. After this engineering we however consolidated our frequency requirement, thereby reducing the required number of frequencies by 25 %. Further heavy compression was made by the working groups. When therefore in column 11 a circuit is indicated as having for instance a complement of 4 frequencies, this circuit actually, on an average, disposes of less than three frequencies. If for example column 11 shows a figure 2/5, this means that there is a higher frequency assigned to the circuit. In reality this might not be true in many cases on account of the consolidation and compression made.

9. Additional observations and comments regarding details in the reports and draft plans will be presented by Sweden at the Extraordinary Conference.

In view of the present uncertainty regarding the time for the Extraordinary Conference Sweden does not at this occasion submit any proposals regarding the work of the conference. Such proposals will however be submitted at a later date.

Note : The drafting amendments contained in Appendix I to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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No 68.2
C.A. Res. 200

(received 11th December, 1950)

Your telegram 157/18 November Stop We do not propose to supply now new commentaries additional to the ones contained in our letter of August 3rd, 1950*.

* Published under No 68.1

SWITZERLAND

N° 69.1

31 May, 1950

Comments on : E

In accordance with the decisions of the Administrative Council of the ITU (Resolution 154/1949), we are submitting herewith our comments on the P.F.B. draft plan.

On the whole, a great many of the proposals for frequency-sharing proved unacceptable on account of the very loading of certain circuits. In this connection we would recall the letter sent by our delegation to the P.F.B. when consolidation was being effected, in which we insisted on the fact that consolidation had been carried very far and that our requirements were the minimum compatible with efficient operation of our circuits.

We regret our inability to accept the P.F.B. proposals in any larger measure.

Note : The detailed remarks and comments annexed to the preceding letter have been classified in a set of files, each of which refers to a detailed service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

N° 69.2

3 June, 1950

Comments on : A

The Swiss P.T.T. Administration, reverting to the reservation formulated by its delegation at the International Administrative Aeronautical Radio Conference (Allotment Plan, page 115) asks for two additional frequencies in the OR bands :

- a) 3088 or 3102 kc/s, to be incorporated in requirement JD 6 Form 2, instead of 3095 kc/s ;
- b) 4738,5 kc/s to be incorporated in requirement JI 6 instead of the requested frequency 5720 which has not been taken into account.

In its opinion, the above frequencies could be used in Switzerland without appreciable extra interference with the sharing countries.

No 69.3
C.A. Res. 200

14 December, 1950

Comments on : A, B, C, E, H and Copenhagen Plans

With reference to your circular letter of 14 October 1950 and your telegram 157/18 of 18 November, we have the honour to make the following comments :

I. 14 to 4,000 kc/s

- a) Region 1 plans. The various plans are acceptable. We maintain our reservation relative to the frequency 3159 kc/s*.
- b) Aeronautical plan. This plan is acceptable, provided account is taken of our reservation and the comments we made in our letter of 3 June 1950.**
- c) Copenhagen plan. This plan has been signed and ratified by the Swiss authorities, and is rigorously applied in Swiss territory. We have, however, noticed that other countries, amongst them some which signed, others which did not sign the plan, have used and are using, frequencies therein allocated to Switzerland, thus causing interference. We reserve the right to take such measures as may be required to ensure an efficient broadcasting service in Swiss territory, should this interference become intolerable.
- d) Copenhagen maritime plan. We have no comments.
- e) PFB plan for band E (3950 - 4000 kc/s) The remarks we made in our letter of 31 May 1950*** still hold good.

II. 4,000 to 27,500 kc/s

- a) Aeronautical plan. See I b) above.
- b) PFB maritime plans. We have no comments.
- c) PFB fixed station plans. Our comments are given in our letter of 31 May 1950***. In general, we find that too many proposals for frequency sharing are not acceptable, and would force us to do away with certain circuits. Our observations are given in detail in the annex to the letter referred to above, and we have no others to make.

* See Final Acts of the Administrative Radio Conference for Region 1, page 250.

** Published under No. 69.2

*** Published under No. 69.1

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CZECHOSLOVAKIA

N° 71.1

5 July, 1950

Comments on : D, E and the whole of the draft list

Reference your circular letters 20/45 and 20/59 and your telegram 92/2 Stop Our Administration maintains the position expressed during the work of the P.F.B. in several statements by its Delegation Stop We still believe that the principles and methods adopted by the P.F.B. are ineffective and that plans and proposals drawn up by the P.F.B. are unacceptable to our Administration Stop As regards special and regional Conferences our position has already been explained in the statements of our Delegations which took part in their work +

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Nº 71.2
C.A. Res. 200

31st January, 1951
(published in Notification Nº 618)

Comments on the whole of the draft list

Further to your circular letter Nº 9.6/764, of 14th October, 1950, and to your telegram Nº 157/18, of 18th November, 1950, we would point out that the Czechoslovak Administration has repeatedly drawn the attention of I.T.U. Members to the contradictory nature of the basic methods and principles used in preparing the draft new International Frequency List, from the moment of their adoption by the Provisional Frequency Board, the Administrative Radio Conference for Region 1, and the International Administrative Aeronautical Radio Conference. Study of these draft plans has shown that they do not correspond to the requirements of all I.T.U. Members. They are therefore far from being realistic and acceptable. We still think that only the Ordinary Radio Conference due to meet in 1952 is capable of finding a solution. A reasoned proposal in this sense, submitted by the Ministry of Postal and Electrical Communications of the Union of Soviet Socialist Republics, is to be found on pages 4 and 5 of General Secretariat Notification Nº 616. To this proposal we give our wholehearted support.

Please bring the above to the notice of all I.T.U. Members by publishing it in the next General Secretariat Notification +

(73)

TURKEY

N° 73.1

31 May, 1950

Comments on: E.

With reference to your circular N° 20/59 of 6th April, we have the honour to inform you that the Turkish Administration, having been unable, due to lack of time, to make a thorough study of the documents enumerated in the list annexed to your letter and to express an opinion with regard to the allocations and measures of consolidation which appear unsatisfactory from its own point of view, will submit its observations at the Extraordinary Conference +

UNION OF SOUTH AFRICA AND TERRITORY OF SOUTH-WEST AFRICA.

Nº 74.1

17 May, 1950

1. With reference to I.T.U. Circular letter Nº20/20 of 10th February 1950, it is desired to submit the following observations :
2. At the 38th Plenary Session of the Provisional Frequency Board the South African delegate stated that, in respect of the date of 1st June 1950, fixed by the Administrative Council for the submission of observations and proposals on the subject of the reports and draft plans prepared by the P.F.B., the South African Administration reserved the right to submit this information at any time up to the 1st September 1950.
3. The late delivery of the plans, which did not reach us before the beginning of May 1950, precludes the possibility of meeting the specified date of the 1st June 1950, for the submission of observations and comments.
4. This Administration has some general comments regarding the suitability of frequencies allocated and in respect of modifications which it is desired to make to details of certain South African circuits which have been catered for in the plans.
5. These comments will be presented as soon as possible.

Nº 74.2

12 June, 1950.

Comments on: C, D, E, F, H and K.

1. With further reference to my letter of the 17th May 1950, I have the honour to attach a schedule containing section 1 of the comments of this Administration on the draft International Frequency Plans.
2. The comments have been classified into two sections viz :

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I. SECTION 1AMENDMENTS OF SUBSTANCE.

This section contains amendments which it is thought will materially affect the structure of the plans; and

II. SECTION 2AMENDMENTS MAINLY OF AN EDITORIAL NATURE.

3. The comments were numbered before their subdivision into two categories with the result that numbers in each section are not consecutive.
4. In order to avoid delay in forwarding Section 1 it is being forwarded in advance of section 2, which will be submitted later. ¹⁾

Note: The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

1) Section 2 has been received annexed to a letter dated 17 July 1950.

No 74.3
C.A. Res. 200

4 December, 1950

Comments on : the whole of the draft list

With reference to your Circular Letter No 9.6/764 of 14 October, 1950, I have the honour to submit the subjoined memorandum :

Memorandum : Resolution No 200. Preparation for the Extraordinary Administrative Radio Conference (cf PV ca5/23) of the Administrative Council.

The following information is furnished by the Union of South Africa in reply to the Invitation of the above-mentioned Resolution :

a) The following plans are acceptable with minor adjustments which were notified on 12 June* and 17 July, 1950, respectively :

- i) 14 -- 150 kc/s Plan.
- ii) Region 1 Administrative Radio Conference.
- iii) Committee of Countries in Region 1 outside Europe (African Plan).
- iv) International Administrative Aeronautical Radio Conference.
- v) HF Maritime Telegraphy and Telephony Plans.

b) The following Plans are acceptable as a basis for discussion at the E.A.R.C. but they are not acceptable for implementation without amendment in accordance with the observations on specific assignments submitted to the Secretary-General in June and July, 1950 :

P.F.B. Plans for :

- i) H.F. Fixed,
- ii) Land Mobile; and
- iii) Tropical Broadcasting Services.

c) No proposal.

d) The desired schedule is attached.

e) The international monitoring station will be opened on 1 January, 1951. Thereafter summaries will be furnished monthly.

A further communication in regard to Resolution 202 will follow shortly.

* letter published under No 72.2

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UNION OF SOVIET SOCIALIST REPUBLICS

N° 75.1

22nd May, 1950

Comments on : A

In reply to your letter N° 20/20 of 10th February, I have the honour to inform you that the views of the Soviet Administration with regard to the question raised by you were explained in detail by the Soviet Delegation at the 30th Plenary Meeting of the International Administrative Aeronautical Radio Conference, Document Aer/2 N° 162 Stop These views remain the same +

N° 75.2

22nd May, 1950

Comments on : C

Reference circular letter N° 20/30 of 2nd March Stop I have the honour to inform you that the views of the Soviet Administration with regard to the question you raise were explained in detail by the Soviet Delegation in statements made to the 32nd and 34th Plenary Meetings of the P.F.B. Stop These views remain the same +

N° 75.3

19th June, 1950

Comments on : D, E, and the whole of the draft list

In reply to your circular letters 20/45, 20/59 and telegram 92/2, the Delegation of the Union of Soviet Socialist Republics to the Provisional Frequency Board repeatedly declared that the Board was wrong in adopting the principles and methods it did adopt, it likewise indicated that it could not accept the list so prepared, the attitude of the Communications Administrations of the Union of Soviet Socialist Republics, the Ukrainian and Bielorussian Soviet Socialist Republics to the list which has been prepared remains unchanged, as to the plans prepared by Regional and Special Conferences, our attitude has been explained at sufficient length in the statements made by the Soviet Delegations at those conferences +

No. 75.4
C.A. Res. 200

6 th January, 1951.
(Published in Notification N° 616)

Comments on: the whole of the draft list

Further to your circular letter No. 9.6/764, of 14 October 1950, and telegram No. 157/18 of 18 November 1950, the Ministry of Postal and Electrical Communications of the Union of Soviet Socialist Republics has the honour to inform you as follows:

In the Provisional Frequency Board, and at the Administrative Radio Conference for Region 1, as also at the International Administrative Aeronautical Radio Conference, the Soviet Delegation, desirous of developing and reinforcing international collaboration in the field of radio, repeatedly pointed out that the conferences called upon to prepare draft frequency allotment plans had adopted as a basis for their work, methods for which there was no scientific foundation and principles lacking in objectivity - methods and principles which offered no possibility of meeting the frequency requirements of all Member-States of the International Telecommunication Union Stop The Soviet Delegation maintained that the Berne Lists of 1939 provided a just and realistic basis from which the new International Frequency List might be prepared, on the grounds that those Lists reflected the actual needs and frequency requirements of countries and had been tried and tested by many years of operating practice Stop

The Soviet Delegation drew the attention of Members of the Union to the fact that work on the draft International Frequency List was proceeding in a way which had nothing in common with the principles of international collaboration, and was in fact designed to obtain a redistribution of frequencies in the interests of the United States of America, Great Britain and France Stop That this was so is confirmed by an analysis of the draft frequency allotment plans submitted Stop

1. Thus, for example, according to the draft plan presented by the Provisional Frequency Board, 39% of all frequencies to be redistributed are to go to three countries: the United States of America, Great Britain and France, the rest of the world receiving only the remaining 61% Stop By virtue of this draft, 17.2 % of the total number of frequencies are to go to the United States, 10.8 % to Great Britain and 11% to France, whereas the Soviet Union receives 4.1 %, China 4.9 % and India 3.7 % - figures which bear no relation to the actual need of these countries, the size of their populations and the extent of their territories Stop According to this same draft, the number of frequencies allotted to the United States, Great Britain and France is greater than it was in the Berne Lists, while those allotted to the Union of Soviet Socialist Republics, China and other countries are considerably fewer Stop

2. Neither does the plan prepared by the International Administrative Aeronautical Radio Conference take account of the interests of I.T.U. Member-States Stop This draft allots one half of the R service (regular air route) frequencies to what are called Major World Air Routes, monopolized by the United States, while the interests of the air services of other Members are completely ignored Stop

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3. The draft plan which was adopted by a small majority of the countries represented at the Administrative Conference for Region 1 represents a complete breach of the Radio Regulations and Atlantic City Resolutions. Stop This draft in no way reflects the interests of Region 1 countries, and in the interests of the United States confirms the allocation of frequencies in the band 1 900 - 2 000 kc/s to Loran stations set up by the United States of America - stations which cause grave interference to the fixed and mobile services of Region 1 countries. Stop

Many other examples could be quoted, but those already given suffice to show that the draft plans prepared for incorporation in the International Frequency List do not correspond to the interests of Members as a whole, and are unacceptable, not only as a basis for discussion, but even as working material for the Extraordinary Administrative Radio Conference. Stop The task of putting the final touches to the draft plans prepared, which has been entrusted to the International Frequency Registration Board, therefore becomes pointless. Stop As regards the Board itself, the necessary conditions for it to assume the tasks mentioned in Article 6 of the Convention do not at present exist. Stop A way out of this situation can be found only by the next Administrative Radio Conference, which alone is empowered to solve the problems arising from changes to be made in the Regulations, and is alone competent to lay the foundations on which a list acceptable to all Members of the Union might be built up. Stop At the same time, the Soviet Administration feels obliged to draw the attention of all administrations to the fact that adoption of a draft list which would not meet the requirements of the aviation, broadcasting, radiotelegraph, radiotelephone and safety services would represent a breach of the principles enshrined in the Atlantic City Convention and would have serious consequences. Stop

As far as the Administration of Postal and Electrical Communications of the Union of Soviet Socialist Republics is concerned, we shall continue, as hitherto, to respect the interests of all Members of the Union, and shall collaborate with all countries which sincerely wish to prepare a new International Frequency List, giving satisfaction to all countries. Stop

We would request you to bring this to the notice of all Members of the Union by publishing it in the next General Secretariat Notification +



URUGUAY

N° 76.1

24 June, 1950

Comments on : A

With reference to the subject of circular letter 20/20 of 10 February 1950 of the I.T.U. General Secretariat and the contents of letter 450/50 from this Administration sent to you on 13 May 1950, I have the honour to inform you :

- a) that Uruguay maintains with the General Secretariat the reservation formulated by its Delegate when signing the final agreement of the I.A.A.R.C. (Geneva, 1949) ;
- b) that its minimum requirements in the aeronautical mobile OR service are :

3 channels in the	3 025 to	3 195 kc/s band
3 channels in the	4 700 to	4 750 kc/s band
3 channels in the	5 680 to	5 730 kc/s band
2 channels in the	6 685 to	6 765 kc/s band
1 channel in the	8 965 to	9 040 kc/s band
1 channel in the	11 175 to	11 275 kc/s band
1 channel in the	13 200 to	13 260 kc/s band
1 channel in the	15 010 to	15 100 kc/s band
1 channel in the	17 970 to	18 030 kc/s band,

- c) that, to facilitate the work of the Extraordinary Administrative Conference, Uruguay proposes that the bands of 9 Mc/s and below, as far as Region 2 is concerned, be handled by the delegates of all the countries included in Region 2 at that Conference ;

- d) that Uruguay cannot indicate specific frequencies, as it would have liked to do to facilitate the work of the Conference, since the frequency Allocation Plan for the aeronautical mobile OR service does not contain the geographical positions of the aeronautical stations of the other countries.

N° 76.2

14 July, 1950

Comments on : E

With reference to the assignment plans drawn up by the P.F.B. for the fixed service sent to us with your circular letter 20/59, the Uruguayan Administration has the honour to forward herewith to the General Secretariat its comments on the part concerning the Aeronautical Fixed Service.

Comments and proposals on the rest of the Fixed Services will be sent to you as soon as possible.

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With regard to the Aeronautical Fixed Service, this Administration notes that the requirements it submitted at Atlantic City have not been considered, since the assignments made by the special Working Group for the co-ordination of the Aeronautical Fixed Services are inadequate and incomplete.

This is due to the fact that Uruguay originally made the mistake of entering its requirements for the aeronautical fixed service on Form 2, but the error was subsequently put right after reception of circular N° 111.14 in which the I.A.A.R.C. asked for them to be transferred to Form 1.

We therefore listed the circuits of the aeronautical fixed service on Form 1 instead of Form 2. The list was brought up to date - as regards the order of the frequencies - and submitted to the P.F.B. by our Delegate. For some unknown reason this list appears in Booklet N° 1 of Doc. 764 as new requirements by Uruguay.

We must make it quite clear that this list contains our real minimum requirements for the aeronautical fixed service both at home and in international relations.

Note : The requirements of Uruguay shown in pages 295 et seq. of Booklet I attached to document 764 were submitted to the P.F.B. on 24 November 1948 and 15 June 1949.

No. 76.3
C.A. Res. 200

18 December, 1950.

Comments on: E and F

In connection with the fixed services, this Administration has pleasure in sending you the following information, as promised in our telegram R 201:

- a) First and foremost, this Administration would point out that the frequency complement which the P.F.B. proposed to assign to circuits 7a and 7b, and to 8a and 8b, is totally inadequate to satisfy the requirements in the lists submitted at Atlantic City since, apart from the sharing of certain frequencies between the above circuits which it necessitates, it also involves circuits 2 and 10 of this Administration.

We must stress the fact that circuits 7a, 7b, 8a and 8b are four independent circuits, used simultaneously for totally different services. They are:

FSK and PTS press transmissions to North and Central America and to the Northern part of South America (7b).

FSK and PTS press transmissions to Europe (8b) and the point-to-point circuits Montevideo-New York (7a) and Montevideo-Moscow (8a).. In these circumstances:

1. operation of circuit 7a makes operation of 7b impossible, and vice-versa;
 2. operation of circuit 8a makes operation of 8b impossible, and vice-versa;
 3. operation of circuit 7 (7a or 7b) in the P band blocks operation of circuit 8 (8a or 8b) since, apart from the circuits which have been made useless by P.F.B. consolidation or unification, PTS operation of any one of circuits 7 and 8 allows only A1 operation of circuit 2;
 4. with circuits 7 (7a and 7b) and 8 (8a and 8b), the frequencies assigned in the dd band will not allow simultaneous PTS operation, since the operation of one puts the three others out of service;
 5. operation of circuit 8 in band Z cancels circuit 10. These circuits are completely independent and must of necessity be used at the same time;
 6. PTS operation of circuit 8 in band X suppresses circuit 2, which is quite independent.
- b) In circuit 9 the band-width assigned to the channel in band P excludes PTS operation.
- c) In circuit 10 the frequency assigned in band Z, as we observed under a) above, makes operation of circuit 8 impossible.

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- d) Several years' experience in the operation of circuit 12 proves that an extra frequency of the order of 9 Mc/s is absolutely indispensable for each of the three complements on which these 14 stations would have to operate.
- e) Circuit 13. We have not been able to gather from the draft lists how many frequency complements the P.F.B. intended to assign to this network. Observation d) above applies to this network also.
- f) Frequency 4 608 kc/s (Band G) for circuit 18 (network of 15 stations) is separated by only 1.5 kc/s from the frequency assigned to circuit 9 which also operates on A3. This means that circuit 18 cannot possibly work at the same time as circuit 9.
- g) Circuit 25. Observation d) above also applies to this circuit.

With regard to the special circuits shown on form 2 submitted by Uruguay at Atlantic City, we might point out that:

- h) Circuit 1 is a National Armed Forces network of 17 stations. Their requirements cannot be met with a single frequency complement, as the list annexed to P.F.B. document 761 would seem to suggest.
- i) Circuit 2 is for a Navy network of 6 stations of which the requirements cannot be met with a single frequency complement.

A few errors and omissions have been discovered in the draft lists. We have not included them in this report, since they are chiefly typographical. Details of them will be forwarded separately, as we do not think they greatly affect the draft assignment plan drawn up by the P.F.B.

This Administration regrets to state that it must be clearly understood that it repeats the statements of its Delegate on the P.F.B. to the effect that the very small number of requirements submitted by Uruguay at Atlantic City speak for themselves. They obviously constitute the basic minimum for the satisfaction of Uruguay's essential needs. Our Administration cannot, therefore, agree to any consolidation or unification which might make it impossible to operate simultaneously the extremely limited number of services of which the successful working is a vital necessity.

Nº 76.4
C.A. Res. 200

20 December, 1950

Comments on : C

I thank you for your circular Nº 20/30, on the draft new Frequency List prepared by the P.F.B., and I have to inform you that this Administration has neither comments nor proposals to make with respect to the frequency assignment plans evolved for coast stations by the P.F.B.

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VENEZUELA

Nº 77.1

28 June, 1950

Comments on : E

This Administration has carefully studied the list of frequencies assigned to Venezuela by the P.F.B. and finds that on account of the continuous development of our broadcasting this list (between 4755 and 5025 kc/s) does not meet our requirements Stop We therefore take the liberty of informing you that we reserve the right to review the matter at the forthcoming conference to be held at The Hague in september 1950+

Nº 77.2

4 July, 1950

Since we have not received draft international frequency list prepared by the P.F.B. we cannot submit any comments now Stop Any comments we may have to make will be submitted to the forthcoming conference of The Hague +

Nº 77.3

10 July, 1950

Acknowledge receipt your telegram 9 July Stop We have received letters 20/20 20/30 20/45 20/59 20/72 20/73 and corresponding documents to the first 3 letters Stop With regard to our telegram dated 28 June we refer to list of frequencies for broadcasting assigned by the P.F.B. and sent by our Delegate to the Conference at Florence Stop We should be grateful if you send us lists and documents annexed to your letters 20/59 20/72 and 20/73 1) +

1) These documents have been despatched by air mail on the 18 July, 1950.

No. 77.4
C.A. Res. 200

14 December 1950.

Comments on: C, E and F

It is my pleasure to send you, attached to this letter, the comments of the Venezuelan Administration on the draft International Frequency List prepared by the P.F.B., at the same time reserving the right to make more detailed comments at the Extraordinary Conference to meet in Geneva in August 1951.

My Administration trusts that the form in which these comments are submitted will facilitate their examination by the P.F.B.

Comments concerning the fixed service are submitted in two forms: one, by circuit and the other, in order of frequencies. We thought in this way to facilitate their analysis both by the Members of the Provisional Frequency Board and by the Administrative Conference which is to meet next year. For the same reasons, domestic services have been separated from international services, as the Venezuelan Administration assumes that the latter will deserve very careful prior attention and that the unavoidable frequency reductions in the 5, 6, 7 and 8 megacycle bands will apply to domestic, and not to international services.

As regards the 4 and 9 Mc/s bands, we are submitting for the consideration of the Board and the Conference a few requirements which we deem essential, since they are for National Defence services. For this reason, and also because they are base stations, we give only their bearings, power, schedule and distance in kilometres. Since the bands in question are not overloaded, we trust that these requirements will be included in the International Frequency List.

A list of requirements is also submitted for the Maritime Mobile Service proper and a list of notifications for the use of the 4 and 6 Mc/s maritime mobile service bands in the local daylight hours by fixed service stations with a power of less than 50 watts.

The Administration of Venezuela attaches special interest to the registration of circuit No. 181 (Caracas-New York), to be found on page 310 of Booklet 1, since this circuit has been in operation since mid-1950 and also to consideration of its domestic aeronautical fixed service requirements, which are submitted in a separate annex.

For tropical broadcasting, we have asked for the inscription of a few channels and also some changes in schedules and powers. In this connection, we think that an arrangement might be reached between the Administrations of Brazil, Mexico, Colombia, Cuba, Venezuela etc. for a distribution that would afford better quality reception in the tropical zone, without losing sight of the definition of this class of broadcasting.

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For the moment, we have no comments on protection coefficients and trust that this problem will receive joint attention at the forthcoming Extraordinary Administrative Conference.

Nevertheless, should other considerations arise before the Conference meets, the Administration of Venezuela is prepared to supply any other data that might be required in this connection and will accept any suggestions the Members of the Provisional Frequency Board or the General Secretariat may have to make.

Note: The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

JAPAN

N° 79.1

23 May, 1950

Comments on : C and E.

In conformity with your circular letter N° 20/59, dated 6th April, 1950, we send you herewith the comments on the draft Plans and a proposal thereto.

As the final documents (second edition) referred to in your circular letter were not available, we had prepared comments by referring to the first editions of the draft documents of P.F.B. We are sorry to say that the final documents did not arrive until 18 May, after which we were obliged to redraft our comments, and immediately forward same to you in effort to meet target date you have assigned in your circular letter.

The contents of the enclosures are as follows :

A Comments.

A-1 Comments for Fixed and Land Stations other than coastal stations.

A-2 Comments for Radio Telegraph coast stations.

A-3 Comments for Radio Telephone coast stations.

Annex 1 Corrigendum and omission to P.F.B. draft frequency lists.

Annex 2 Additional uses previously submitted or in process of submission under par. 16, Resolution adopted AC.

Annex 3 New requirements for circuits to be established before 1 Sept., 1950.

B Proposal on allocation of Frequencies to circuits under 300 Km.

A Comments.

Following explanatory notes may help you in interpreting our comments.

Explanatory notes on comments

1. In reviewing the list, we have found some instances misprinted or modified through clerical error, and such instances were picked up and listed them in the Annex 1.
2. We have compared our final proposal and the list plan, and where there is no difference or where the draft assignment is satisfactory we have indicated the assignments concerned as NO COMMENT.
3. However, there are some consolidated assignments which are impossible to carry out because of propagation characteristics or of foreseen harmful interferences, considered from operational experiences. In addition we have found some circuits for which we originally proposed

to share their frequencies, were impracticable on account of the later increase of traffic, and/or recent actual operational experiences.

These circuits were indicated as CANNOT AGREE.

4. We have divided into two parts our additional requirements which are to be made in accordance with paragraph 16 of the Resolution relating to the preparation of the New International Frequency List. One part, Annex 2, consists of the requirements previously submitted to P.F.B., also the circuits already established but not yet notified to P.F.B. Other part, Annex 3, consists of these circuits expected to start operation before 1st September, 1950, but not notified yet to P.F.B.
5. The changes or modifications, as well as additions of transmitting stations, receiving localities, class of emission, etc., concerning the existing circuits are indicated in Annex 2.

B - Proposal

On reviewing the draft plan, we have found many cases of assigning improper frequencies on some of the short distance circuits, especially in the band between 5 and 8 Mc/s. It seems to us that these assignments were made by referring solely to the frequency complements rule where the circuit distance of 0 to 400 km. is treated as a single category.

Our operational experiences show clearly that for the shorter circuit distance the lower frequencies are available as the optimum working frequency. If we were to transfer those higher frequencies used for circuits of less than 300 km. to the lower bands, the congestion on those heavily loaded bands might have been mitigated substantially.

We should like, therefore, to propose that the next conference would review those short distance circuits for the purpose of shifting them as far as possible to lower bands to accommodate more proper circuits.

No 79.2

June, 1950

Comments on : F

Soon after we despatched on 24 May 1950 our comments on the P.F.B. plan of frequency assignments and our proposals concerned, we have received the list of frequency requirements to be included in bands K, L, M, N and O, and the list of requirements submitted between 25th February 1948, and 1st April 1950 (Booklets I - IV). Accordingly, I beg to inform you that as a result of our study on these documents, we have compiled amendment of the above comments and list of further additional requirements which are enclosed herewith.

We are very sorry to trouble you, but these troubles were unavoidable owing to the fact that these documents reached us too late and we have been obliged to make our comments and proposals basing on old documents. We hope you would sympathize our circumstances and handle our additional documents favourably.

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Our additional documents include :

1. Amendment on Annex 1 of our comments previously submitted ;
2. Addition to the comments ;
3. Addition to Annex 2 of the comments ;

As to N° 1, we have listed these circuits on page 2 of the Annex 1 as omission in the Plan, but as they are included in the latest list, these circuits should be deleted from the Annex 1 and be inserted between pages 7 and 8, of comments previously submitted.

Note : The detailed remarks and comments annexed to the two previous letters have been classified in a set of files, each of which refers to a given service, band and region. These files are at the disposal of the Extraordinary Administrative Conference.

Nº 79.3
C.A. Res. 200

25th December, 1950

Comments on : J

The Japanese Administration has the honour to send you herewith the comments in respect of frequency assignment plans below 4 000 kc/s and those between 4 000 and 27 500 kc/s (additional requirements) in accordance with the appendix 15 of your circular letter Nº 9.6/764 of 14 October, 1950.

The comments consist of four parts, i.e.:

- | | | |
|--|---|------------------------|
| 1. General comments |) | |
| 2. Comments and amendments |) | for Region 3 frequency |
| 3. Additional requirements |) | assignment plans. |
| 4. Additional requirements for P.F.B. plans, | | |

of which part 1 was submitted through the United States Government as the comments for the Territories of the United States of America.

The Japanese Administration regrets to inform you that as your circular letter reached us too late, we could not prepare these documents in time requested by your letter. We should be very much obliged to you if you could accept these documents as filed in time.

1. General Comments

for Region 3 Frequency Assignment Plans

- 1) In view of the fact that many commercial broadcasting stations are to be established as the consequence of the enforcement of the new Radio Regulatory Law, the Japanese Administration desires to make some changes in assigning medium frequencies for broadcasting stations throughout Japan. It is anticipated that these changes will affect the present frequency assignment plan, prepared by the Region 3 Administrative Radio Conference in the band 535 - 1 605 kc/s, and the Japanese Administration requests reservation to make amendments and to submit additional requirements to the Extraordinary Administrative Conference.
- 2) In accordance with Article 3 of International Radio Regulations (Atlantic City, 1947) and considering the fact that Japanese areas are contiguous to Region 1, the Japanese Administration requests a reservation to amend assignments made by the Region 3 Conference, at the forthcoming Extraordinary Administrative Radio Conference, in the interest of avoiding interference with Region 1 assignments.

Note : Parts 2, 3 and 4 of the comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

(81)

CEYLON

No 81. 1

10 June, 1950

Comments on : E and J.

UK services and cable and wireless limited have following comments on frequency assignments in draft assignment plans prepared by P.F.B. to radio stations which they operate in Ceylon.

.....

They have no comments on the appropriate assignments in Region 3 plan +

Note : The detailed remarks and comments contained in the previous telegram have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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No. 81.2
C.A. Res. 200

14. December, 1950.

Comments on: J

Ceylon Administration accepts allocation to Ceylon in Region 3 plan subject to right to submit additional requirements for projected services Stop Regarding allocations 870 kc/s 1030 kc/s and 1310 kc/s propose to consult other interested administrations direct on reduction of power to minimise interference +

No 81.3
C.A. Res. 200

3rd March, 1951

Reference telegram 157/18 Stop Ceylon Government will be represented at Extraordinary Conference Stop Shall be submitting new comments Stop Please treat telegram of 14th December as first instalment of comments +

COMMENTS FROM SOURCES OUTSIDE THE UNION

Note : Inclusion in Booklet A of the following general comments, publication of the detailed comments annexed to them, and classification of these detailed comments in the corresponding files implies no recognition by the ITU of the status of the country concerned or of the competence of the originating authority in relation to the I.T.U.

GERMANY
(British Zone)

17 July, 1950

Comments on : E

1. Reference the above subject.
2. Herewith please find comments on the civil circuits in the British Zone of Germany which have been considered by the Provisional Frequency Board.
3. Other comments will be following as soon as they have been prepared.

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

COMMENTS BY ADMINISTRATIONS
on the
DRAFT NEW INTERNATIONAL FREQUENCY LIST

SUPPLEMENT No 1 TO BOOKLET A

ADDITIONAL GENERAL COMMENTS

International Telecommunication Union
Geneva, 1951



CANADA

CORRIGENDUM TO BOOKLET A

Page 33, No 13.1, paragraph 3 :

Amend the first line to read :

"3. It would appear that the P.F.B. has not endeavoured..."

(This corrigendum refers only to the English text).

REPUBLIC OF HAITI

No.35.5
C.A. Res. 200

2nd June 1951

We have the honour to send you corrections and additional remarks in connection with the comments we sent you with our letter dated 4 December 1950*. Perhaps you would be so good as to add this report to the Republic of Haiti's file for submission to the Extraordinary Administrative Radio Conference.

The List of Requirements of 4 December 1950 should be revised to incorporate the changes found necessary as the result of continuous radio development in Haiti.

Below will be found the list of requirements of the various Services:

BANDS	NUMBER OF FREQUENCIES	Kc/s FREQUENCIES IN USE	SERVICES UTILISING THESE FREQUENCIES
E	2	3960 3987	Service des Télégraphes, Téléphones et Radiocommunications.
F	3	4000 and 4305 4005	Armée d'Haiti Télégraphes, Téléphones et Radios
G	3	4460 4500 4570	RCA Communications Armée Service aéronautique
J	1	5040	Aéronautique
K	1	5122.5	"
L	1	5425	"
P	4	7570 7795 8010 8020	West Indies Telephone Service aéronautique Télégraphes, Téléphones et Radios RCA Communications
Q	2	9110 and 9270	Service aéronautique
R	2	9420 and (9815)	Armée
T	2	10040 11540	West Indies Telephone RCA Communications

* Published under No.35.4 (page 84)

BANDS	NUMBER OF FREQUENCIES	Kc/s FREQUENCIES IN USE	SERVICES UTILISING THESE FREQUENCIES
U	3	11960 12295 and 12875	Service aéronautique Télégraphes, Téléphones et Radios
W	1	14940	West Indies Telephone
X	1	16040	Rca Communications
Z	1	19312.5	Télégraphes, Téléphones et Radios

Comparing these requirements with the PFB allocations, we find that the following additions to the latter are necessary, to ensure effective relations at all periods of the day and year :

2	frequencies in the band	E
1	"	F
1	"	G
4	"	P
1	"	R
2	"	T
2	"	U
1	"	X

The calculation submitted in our comments of 4 December 1950 of the minimum of frequencies required to satisfy all the international radio needs of Haiti is found today to be inadequate.

The other observations on the frequencies employed in the inter-urban (trunk) service and in the aeronautical mobile service still hold good.

I N D I A

No.38.4
C.A. Res. 200

16th April, 1951

Comments on : F and J

In continuation of para 4 of this office letter No.IDWB 147/50 dated the 2nd January, 1951* on the above subject and in compliance with Resolution number 200 of the Administrative Council, I am directed to forward herewith detailed comments (in duplicate) in amplification of the comments already sent with this office letter quoted above.

2. The detailed comments consist of the following :-

- (1) A circuit-wise statement showing the frequencies asked for, engineered according to the P.F.B. Rules indicated by the band and the frequencies actually assigned to India in the draft plans that have been prepared by the P.F.B.
- (2) A statement frequency by frequency showing the workability of the assignments made to India in the ascending order of frequencies, plan by plan, according to the P.F.B. notation.

3. Only in cases where the frequencies are considered unworkable for India, it has been indicated by the letter 'B' in the remarks column. No remarks have been given in other cases. The following symbols have been used :-

B1 = assignment bad for emission A1.
B3 = assignment bad for emission A3.

The number after the letter B indicate the type of emission for which the assignment is considered bad.

4. Statement 2 gives the details of the interfering circuit, country and frequency also, which is considered to make the assignment to India unworkable.

* Published under No.38.3, page 90.

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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MEXICO

No. 48.1
C.A. Res. 200

26th March 1951.

Comments on : E and F

I have the honour to send you herewith three copies of the comments of my country's Government on the draft frequency assignment plans drawn up by the Provisional Frequency Board.

I hope that these comments may be taken into account by the International Frequency Registration Board.

COMMENTS ON P.F.B. DRAFT PLANS
CONCERNING TROPICAL BROADCASTING IN THE BANDS H, I and J

Taken as a whole, the assignments allocated to Mexico in these Bands are so reduced in power and in number in comparison with the needs in frequencies, that the Mexican administration cannot seriously take into consideration the Draft of the P.F.B. plans and therefore feels that these should be completely reexamined.

Note : The detailed remarks and comments annexed to this letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Conference.

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PAKISTAN

No 53.7
C.A. Res. 200

23rd June, 1951

Comments on : B

Aeronautical mobile R assignment plan considered satisfactory
by this Administration +

C E Y L O N

No. 81.4
C.A. Res. 200

30th May, 1951.

Comments on : A, B, D, E, J.

With reference to Resolution No.200 adopted by the Administrative Council of the I.T.U. at its 5th session and this Government's telegram of 3rd March, 1951*, the further comments of this administration on the frequency allocations to Ceylon as appearing in the Published work of the P.F.B. and other conferences are detailed below:-

I.T.U. Region 3 Conference.

The allocations to Ceylon in the I.T.U. Region 3 Frequency Allocation Plan are acceptable. This administration, however, reserves the right to submit requests for further allocations in the bands dealt with by the Region 3 Conference. With regard to power limitations on the frequencies 870 kc/s, 1030 kc/s and 1310 kc/s, this administration will consult directly other interested administrations.

Aeronautical Mobile (R) and (OR) Plans.

This administration accepts in general the allocations to Ceylon under the Aeronautical (R) and (OR) Plans subject to the condition that minor modifications that will be necessary to make the plans more acceptable will be submitted directly to the Extraordinary Administrative Radio Conference after consultations with the delegations of other interested administrations.

Allocations by the P.F.B.

The annexed schedule contains comments on the specific allocations made in various bands by the P.F.B. and refers to those cases which in consideration of the statements made in the comments, this administration thinks that satisfactory operation of those circuits will not be possible. It has, however, to be pointed out that these comments refer only to those bands for which draft allocation plans contained within the bands have been completed. No comments are forwarded in respect of frequency bands for which only sharing plans or extended allocation plans have been drawn up. These comments will have to be either modified or additional comments submitted direct to the Extraordinary Administrative Radio Conference, if such a course becomes necessary after studying the comments of other administrations on these plans.

Such proposals, relating to new methods of bringing into effect those parts of the Atlantic City Table for which the Conference is unlikely to establish a frequency list, as this administration may wish to submit, will be submitted direct to the Conference.

* Published under No.81.3 (page 214)

Note : The detailed comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Radio Conference.

COMMENTS BY ADMINISTRATIONS
on the
DRAFT NEW INTERNATIONAL FREQUENCY LIST

SUPPLEMENT No 2 TO BOOKLET A

ADDITIONAL GENERAL COMMENTS

International Telecommunication Union
Geneva, 1951



SAUDI ARABIA

No. 3.2
C.A. Res. 200

27th June, 1951

Comments on : A, B, E

.....
I request you to cancel the former aeronautical frequencies requested and to register the undermentioned ones as well as notifying this Administration of their registration:

Frequencies required for fixed aeronautical stations:

Frequency kc/s:	Type of emission:
3 050	A1
4 235	A1
4 400	A1
7 950	A1
9 000	A1
9 250	A1
12 100	A1
13 120	A1
14 440	A1

Frequencies required for mobile aeronautical stations:

Frequency kc/s:	Type of emission:
4 575	A1
6 510	A1
6 517	A1
6 583	A1
6 590	A1
370	A2
395	A2
3 105	A3
118 100	A3
119 100	A3
122 100	A3

These requested frequencies with the exception of 13 120 kc/s and 7 950 kc/s are according to the recommendations set forth by the International Civil Aviation Organization's special meeting on aeronautical fixed services in the AFI and MID Regions, Paris, March-April 1950, as amended by the second Middle East Regional Air Navigation Meeting Istanbul, October-November 1950.

I have requested frequency 13 120 kc/s for employment in the aeronautical fixed service. I am aware that this frequency does not fall in a fixed band as recommended by ITU in Atlantic City Conference. Neither do many of the frequencies which have been recommended by ICAO; therefore, I am prepared to withdraw my request for the frequency 13 120 kc/s, if ITU will assign an alternative frequency in the 11 975 - 12 330 kc/s band.

The requested frequency 7 950 kc/s falls in the 7 500 - 8 195 kc/s fixed service band. Again, I am prepared to accept any frequency in this band as assigned by the ITU.

.....

(4) - 4 -

ARGENTINE

(REPUBLIC)

No. 4.4
C.A. Res. 200

29th June 1951

Comments on : C (omissions in Booklet E)

I have to bring to your notice that in Booklet E (detailed comments by administrations on plans for the exclusive Maritime Mobile Bands) a whole series of Argentine proposals, sent you with our letter of 12 March, 1951*, have been omitted.

While confident that these omissions constitute no more than an oversight, since no reference is to be found in the Booklet concerned, the Argentine Administration notes that in Chapter VII of its proposal for the Extraordinary Conference the IFRB nevertheless quotes the Argentine proposals correctly, in a general way.

Hence I should be greatly obliged if, to make good the mistakes noted in the attached list, you would kindly publish the necessary material.

* Published under No. 4.3

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Radio Conference.

BURMA

No. 9.3
C.A. Res. 200

29th May, 1951

Comments on : C

.....
This Administration desires four harmonically related frequencies for Coast Station Telegraph Services preferably 4 200, 8 400, 12 600 and 16 800 kc/s as already intimated.

In addition, one Coast Station Telephone Service frequency in the 8 Mc/s band will meet our present needs. For this the frequency 8 768,9 kc/s is acceptable.
.....

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PORTUGUESE COLONIES

No. 18.4
C.A. Res. 200

25th July, 1951

Comments on : E

With reference to your circular letter No. D/1853/R of 29 June 1951 I have the honour to inform you that several frequencies requested on the forms which accompanied my letter of 27 May 1950* do not appear in Booklet F. I would consequently request you to check the Booklet and issue the requisite corrections.

* Published under No. 18.1

BELGIAN CONGO AND TERRITORIES OF RUANDA-URUNDI

No. 21.6
C.A. Res. 200

29th June, 1951

Comments on : H

I have the honour to inform you that the frequency assignment plan for the band 255 to 415 kc/s, drawn up in 1949 by the ITU Administrative Conference for Region 1, no longer meets the needs of the Belgian Congo.

Increasing air traffic has necessitated the installation of a radiobeacon at Kamina, Kigali, and Bumba, and of a radio marker beacon at the aerodromes of Léopoldville, Stanleyville, and Elisabethville, for which no frequency was claimed at the time.

To avoid any change in the existing plan, and in view of the power actually used, or contemplated, for these new radiobeacons, I suggest that the following frequencies, already assigned to one or more stations in the Belgian Congo, be assigned to the places mentioned below :

<u>Radiobeacons</u> :	Kamina	326 kc/s
	Kigali	388 kc/s
	Bumba	388 kc/s

<u>Radio marker</u>		
<u>beacons</u> :	Léopoldville	397 kc/s
	Elisabethville	320 kc/s
	Stanleyville	388 kc/s

Further, since Atlantic City allotted no frequency band for joint use by the aeronautical and maritime services, and since I have to use the radiobeacon at Banana for both these services at the same time, I propose that the frequency 364 kc/s assigned in the above-mentioned plan be replaced by 315 kc/s.

GREECE

No. 33.3
C.A. Res. 200

29th May, 1951

Comments on : A, B, E

.....
We have the honour to inform you that together with our letter dated January 5th 1951* were forwarded to you two lists containing our frequency requirements for the Aeronautical Service, of which List I refers to the Fixed, and List II to the Mobile Aeronautical Service.

Both those lists comprise frequencies which are already in operation and it is our desire to retain same.

More specifically, as regards the Mobile Aeronautical Service, we would point out that this country has not signed the Geneva Agreement (1948-1949), having explained the reasons by two declarations which were included in doc. AER/2, doc. 44E and 59E.

Notwithstanding the above, our Administration, being always inspired with a spirit of international cooperation, is willing to accept the Frequency Allotment Plan prepared by the Geneva Aeronautical Conference, if air-services, which were requested by the List forwarded together with our letter of January 5th 1951, are approved.

.....

* Published under No. 33.2

NEW ZEALAND

No. 52.7
C.A. Res. 200

26th June, 1951

Comments on : J

In further reference to your Circular Letter 9.6/764 of the 14th October and in particular to Annex No. 15 concerning Resolution 200 of the Administrative Council: forwarded herewith are two copies of a list setting out the amended requirements of this Administration for frequencies in the Region 3 bands, based on a frequency separation of 4 kc/s. The data is submitted in accordance with Article II of Part I of the Final Acts of the Region 3 Conference, 1949.

There has been some delay in completing the revised plan due in a measure to the need for close collaboration with the Australian Administration. Except in the case of a few isolated assignments, complete agreement has now been reached with Australia.

Note : Copies of this list are available for the use of the Extraordinary Administrative Radio Conference.

URUGUAY

No. 76.5
C.A. Res. 200

21st May, 1951

Comments on : C

.....
Referring to frequencies for the maritime mobile service, I have the honour to inform you that the remarks made by this Administration in para. i) of letter dated 18 December 1950*, refer to the frequencies of a fixed service network for the Military Marine and not for the Maritime Mobile Services.
.....

* Published under No. 76.3

JAPAN

No. 79.4
C.A. Res. 200

July, 1951

Comments on : J

In accordance with the appendix 15 of your circular letter 9.6/764 (Oct.14, 1950), the Japanese Government forwarded to you, on Dec. 25, 1950*, our comments on the frequency assignment list adopted at the Region 3 Radio Administrative Conference, in which we intimated, that, in view of the expected expansion of commercial broadcasting stations, the Japanese Administration would request some amendments in the band between 535 and 1605 kc/s at the Extraordinary Radio Conference. As the Commercial broadcasting service was established on July 1, 1951, and many changes in frequencies were put in force, we have the honour to forward to you herewith the comments and additional requirements.

These comments were prepared after careful investigation of the frequency assignment plan adopted at the Region 3 Radio Administrative Conference and the present conditions prevailing in the Region 3, and they concur with the status of medium wave broadcasting services in Japan.

The comments consist of two parts:

1. Comments and Amendments to the Region 3 Frequency Assignment Plan.
2. Additional requirements for the Region 3 Frequency Assignment Plan.

The Japanese Government regrets very much that it could not prepare these documents in time requested by your letter owing to the delay of the establishment of commercial broadcasting stations, and it would be highly appreciated if you would afford good offices in accepting these documents.

* Published under No. 79.3

Note : The detailed remarks and comments annexed to the previous letter have been classified in a set of files, each of which refers to a given service, band or region. These files are at the disposal of the Extraordinary Administrative Radio Conference.
