



**REC Networks / REC ネットワーク**  
**J1 Radio/J1 ラジオ**  
11541 Riverton Wharf Rd  
Mardela Springs, MD 21837  
+1 202 621-2355  
<http://www.recnet.com>  
<http://www.J1FM.tokyo>

**Michelle ("Michi") Bradley**  
太田道子  
Founder of REC/Director of J1 Radio  
REC 代表取締役  
J1 ラジオ ディレクター  
Tokyo: 03(4510)2365  
mae@recnet.com

Riverton, Maryland USA, 28 May 2018

To: Irish Radio Transmitters Society (IRTS)

Re: Consultation on new amateur spectrum.

To whom it may concern,

It is an exciting time to be an amateur operator in Ireland. Ireland has achieved a massive expansion in spectrum in the low VHF with new allocations at 30-49 MHz and 54-69.9 MHz. With the hope of a successful reallocation of 52-54 MHz to the Amateur Service in ITU Region I at the upcoming 2019 World Radio Conference, this is a nearly continuous throughout the amateur band we hope could someday inspire some movement in the USA for the FCC to consider a secondary allocation to the amateur service, especially at around 40 MHz.

In the USA, the Table of Allocations (47 C.F.R. 2.106) does show a federal government fixed and mobile allocations from 40-42 MHz and a non-government fixed and land mobile allocation from 42-46.6 MHz. This spectrum may still be use by many state and local agencies. The FCC's Universal Licensing System is showing over 9,000 licenses nationwide in the 42-46.6 MHz spectrum. Unfortunately, there is no view into the federal government use of 40-42 MHz. With the evolution of narrowband land mobile technologies and the desire of interconnection of public safety agencies as well as the characteristics of VHF low-band, I anticipate more of these licensees discontinuing their low band operations over time and based on the US government use of 40-42 MHz, it may be a bit easier to get that spectrum reallocated to the amateur service as a potential for transatlantic communications. I am very sure that there is discussion between the IARU Region I and its societies and the ARRL working with the FCC and NTIA to secure at the minimum a 40-42 MHz secondary amateur allocation, which could garner some new interesting transatlantic opportunities.

One of the position statements of REC Networks is the eventual reallocation of some low-band television channels in the United States to non-television broadcast use including the reallocation of 54-60 MHz to the amateur radio service as well as the reallocation of 76-88 MHz to sound broadcasting. 54-60 MHz is our TV channel #2. I do feel that this spectrum does offer an interesting opportunity for transatlantic "TV DX", especially as we get closer to the peak of the next cycle. It is very highly unlikely that the US would ever give up 54-60 MHz for amateur radio but it may be possible for experimental operations from the US east coast using directional antennas towards Europe for TVDX testing.

Likewise, those tests also have the opportunity to go the other way from Ireland to the eastern USA. The draft 5 metre band plan for the US TV channel 2 region calls for a mix of weak signal, digital and

narrowband voice usage and then in the 60.1-69.9 MHz band, the ability to use up an 8 MHz bandwidth for experimental broadband and wideband video. US TV Channel #3 is from 60.0-66.0 MHz. In the days of analog TV in the USA, there were many opportunities to receive "DX" TV stations from thousands of miles away, especially on Channel 2. With that, there is an opportunity for analog monochrome or NTSC system M video experiments, especially during sunspot peaks.

I do feel that Ireland should not stop their band plan for the sake of a rare opportunity for TVDX on US Channel 2 (54-60 MHz) however, the band plan and rules with ComReg should take into consideration the potential of transatlantic experimentation in this band, especially from the western coast of the Republic using directional antennas towards the Atlantic and that special emphasis be placed on the following frequencies:

- 55.25 MHz – Video carrier frequency.
- 58.30 MHz (58.829545) – NTSC colorburst frequency.
- 59.75 MHz – Audio carrier frequency.

Likewise, the plan should be cognizant of "Channel 3" television experiments starting at 60.0 MHz (as opposed to 60.1 MHz). I know the intention of the band plan is to protect existing beacon operations at 60.05 MHz. Like with Channel 2 (54-60 MHz), the ability for directional transatlantic experimentation should not be hampered by beacons on the backscatter.

Of course, any viable transatlantic television operations may require a variance from ComReg as effective radiated powers exceeding 50 watts may be needed for the experiments will be viable (though a 50-watt analog ATV signal on US Channel 2 reaching the northern US east coast would be incredible.

Myself, I am a United States and Ireland dual citizen and holds a US Extra Class license. I currently do not hold an EI call.

Again, congratulations on this big win for amateur radio. Let's have fun with this new spectrum!

If you have any further questions regarding this spectrum use in the USA, please let me know.

73,

Michelle Bradley, KU3N

Founder

REC Networks

<http://recnet.com>

<http://recnet.ie>