**Comments on ECC Deliverable**

**“Draft ECC Report 358”**

**1 Sources**

**Entity: Administration Italy – Ministry of Enterprises and Made in Italy**

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**2 General Comments**

The changes proposed are mostly editorial in nature. The proposals are concentrated in sections that are related to Fixed Satellite services. Some changes were also made to parts of conclusions of studies of WBB LMP with Fixed Service that are similar to the conclusions of FSS to make it consistent.

**3 Proposals related to the ECC Deliverables**

**Note:** Contributors shall use the following table to provide comments. It is also encouraged to provide as an annex a separate document showing the proposals with track changes. Minor editorial corrections do not need to be recorded in the table. The table is used in the resolution meeting to record how each proposal is addressed.

*The* following information must be included.

* **Comment number**: Sequential numbering of comments in the format “XX/1”, “XX/2” etc, where “XX” is the organisation name or a suitable abbreviation. Administrations may use CEPT country codes
* **Section number/Clause**: Relevant section number of the deliverable, use numbers where applicable e.g. “1.1”, “A1.4”, “List of abbreviations”
* **Paragraph/Figure/Table**: Paragraph number in section, e.g. “1”,”2”.. or Figure/Table, e.g. “Figure 1”, “Table 2”
* **Type of comment**: “General”, “Technical” or “Editorial” depending on the nature of the proposed changes
* **Comment**: Background/justification for proposed changes
* **Proposed change**: Proposed modifications shown in revision marks where possible. For more complicated changes (e.g. proposed deletion/addition of whole sections) or changes to tables it is sufficient to refer to the annex including the changes

| **Comment number** | **Section number**  **Clause** | **Paragraph**  **Figure**  **Table** | **Type of comment**  (General,  Technical or  Editorial) | **Comment** | **Proposed change** |
| --- | --- | --- | --- | --- | --- |
| I/1 | **0** | Paragraph 2 Page 3 | Editorial | The real terrain hinders or favours protection, not data | because real terrain can not only hinder, but also favour propagation |
| I/2 | 0 | Paragraph 5 Page 3 | General | Text proposal to better clarify that mitigation techniques could be used when needed and on a case by case basis during coordination.  In addition it seems appropriate to mention at this point that CEPT will provide guidelines for such coordination. | Nevertheless, appropriate mitigation techniques could be considered during coordination on a case by case basis to facilitate coexistence between WBB and FS/FSS systems, both at national level and with the neighbouring countries. CEPT is developing recommendations for administrations to provide guidance for coordination between these services. |
| I/3 | 0 | Paragraph 4 Page 4 | General | It is preferable to use the same terms to refer to the guidelines to be provided by CEPT, otherwise there is a risk of misunderstandings and it seems that they are different things. It is suggested to always use “recommendations” or “guidelines” | CEPT is developing recommendationsfor administrations to provide guidance on the approach to coexistence in the band. There may be also a need to further develop relevant cross border recommendations. |
| I/4 | 1 | Paragraph 1  Page 9 | Editorial | It is clearer to have separate bullet points for in-band studies and those in adjacent bands. | … results of:   * sharing and compatibility studies between WBB LMP networks; * sharing and compatibility studies between WBB LMP networks and incumbent users in the 3.8-4.2 GHz frequency band, notably receiving satellite earth stations in the fixed satellite service and terrestrial fixed links to ensure the protection and the future evolution and development of incumbent users sharing this band and, * sharing and compatibility studies between WBB LMP networks and spectrum users in adjacent bands (such as MFCN below 3.8 GHz). |
| I/5 | 3 | Paragraph 1 Page 12 | General | it is proposed to specify that the allocations refer to the ECA table to be found in EFIS because it is more correct | Allocation of services and application according to ECA Table [3] in ECO Frequency Information System (EFIS) for frequency range 3400-4400 MHz are provided in Table 1. |
| I/6 | 3 | Table 1 Page12 | Technical | Proposal to include in Table 1 the information that the band 3800-4200 MHz is allocated on a secondary basis in the Radio Regulations in Region 1 and that in some CEPT countries the mobile service may be on secondary basis.  In fact if in the ECA table there is an allocation to the mobile as primary status, it means that there are at least 15 CEPT countries that have the mobile as primary in the band, but the rest could have the mobile as secondary according to the RR. | Note1: The band 3800-4200 MHz is allocated on a secondary basis in the Radio Regulations [4] in Region 1 to the mobile service and in some CEPT countries the mobile service may be on secondary basis. |
| I/7 | 6.2.2 | Paragraph 7 Page 39 | Editorial | There is a minus sign which must be deleted. | the flat terrain and the real terrain elevation, some conclusions can be drawn:   The altimetry of the real terrain should be taken into account in the coexistence assessments on a case-by-case basis. |
| I/8 | 6.2.2 | Paragraph 10 Page 39 | General | Text proposal to better clarify that mitigation techniques could be used when needed and on a case by case basis during coordination. | taking into account the use of appropriate mitigation techniques that could facilitate coexistence on a case by case basis. |
| I/9 | 6.2.4 | Paragraph 1 Page 41 | **Editorial** | The real terrain hinders or favours protection, not data | because real terrain can not only hinder, but also favour propagation |
| I/10 | 6.2.4 | Paragraph 3 Page 41 | General | See comment I/1 | Nevertheless, appropriate mitigation techniques could be considered during coordination on a case by case basis to could be considered during coordination on a case by case basis to facilitate coexistence between WBB and FS systems, both at national level and with the neighbouring countries. |
| I/11 | 6.3.8 | Paragraph 4  Page 49 | General | See comment I/1 | Appropriate mitigation techniques could be considered during coordination on a case by case basis to facilitate coexistence between WBB and FSS systems, both at national level and with the neighbouring countries. |
| I/12 | 7.1.4 | Paragraph 2  Page 58 | General | See comment I/2  Proposal to replace “toolbox” with “guidelines” or “recommendations” | The particular semi-synchronisation could be further investigated as part of relevant guidelines in order to implement this approach on case-by-case basis in order to ensure more efficient usage of the spectrum as appropriate. |
| I/13 | 7.1.8 | Paragraph 4  Page 63 | General | See comment I/2  Proposal to replace “toolbox” with “guidelines” or “recommendations” | CEPT is developing recommendations for administrations to provide guidance on the approach to coexistence in the band. |
| I/14 | Annex 4 | Page 85 | Editorial | Proposal to add references to the Radio Regulations and the ECA Table that are mentioned in section 2 | [3] European Table of Frequency Allocations and Applications (ECA) Table  [4] ITU Radio Regulations, Edition of 2020 |