

**Document IWG-2/019 Rev.1**

**Comments of IWG-2 on RCS Draft Preliminary View on Agenda Item 1.18**

IWG-2 has prepared its own preliminary view on agenda item 1.18. In reviewing the RCS preliminary view on this agenda item, IWG-2 found one additional aspect on which it wishes to comment.

IWG-2 agrees with the conclusion of the RCS preliminary view that the Article 21 pfd limits should not be changed and that HEO or HIO systems are a sub-category of non-GSO systems and are therefore subject to the provisions of the Radio Regulations applicable to non-GSO systems. However, IWG-2 opposes the inclusion of the second sentence of the US view #2: “The results of studies will be improved by considering only 2-3 HIO systems and using realistic assumptions for the characteristics for fixed-satellite service and fixed service systems.” This sentence addresses a specific underlying assumption for studies that are ongoing in the ITU-R and is not appropriate for text in preliminary view or proposal language for a WRC. As an alternative to deletion of the sentence, it could be generalized in an acceptable manner as follows: “Studies will be improved by using realistic assumptions for the fixed-satellite service and fixed service systems.”