

ARRL Files Comments To Protect The 70 Centimeter Amateur Band

The ARRL, The National Association for Amateur Radio, has filed comments with the Federal Communications Commission to oppose part of an application that would impact the 70 centimeter amateur band for telemetry, tracking and command of satellites. The application, from AST & Science, LLC, requests unprecedented authorization to 430 through 440 MegaHertz for a constellation totaling 248 satellites to communicate with five ground stations using up to five channels with up to 256 kiloHertz bandwidth.

The formal opposition, filed by ARRL's Washington Counsel, asserts that the permission AST seeks to use the 430 through 440 MegaHertz band should be denied because AST does not demonstrate need for telemetry, tracking and command spectrum beyond that available within existing allocations. The filing goes on to highlight just how unprecedented the request is.

The Requested Spectrum Is Not Allocated for the Requested Purpose.

The 430 through 440 MegaHertz band is not allocated domestically or internationally for the requested space to Earth and Earth to space satellite telemetry, tracking and command operations. As others already have noted in this proceeding, signals in this band from AST's current 5 satellite constellation have been observed throughout the world, including in the United States, notwithstanding that the satellites are authorized to communicate only with five ground stations well outside the United States.

From the operations by the current five satellites, it appears that the satellites at times have transmitted continuously in the 430 through 440 MegaHertz band throughout their orbit, not just when in communication with one of the authorized ground stations. This activity defeats the purpose of preventing interference in the United States by limiting operations in this band to ground stations distant from the United States. Authorizing an additional 243 satellites to use this band, which would result in multiple satellites over the United States at all times, would effectively usurp this band's allocated use.

The 70 centimeter band is also used in emergency communications. As recently as early July, ARRL volunteers serving in the Amateur Radio Emergency Service, made headlines for providing critical communications in flood ravaged areas of the Texas Hill Country. Allowing the 70 centimeter band to become overrun with telemetry, tracking and command satellite operations, could impact the ability for the Amateur Radio Service to be used in future disasters. Telemetry, Tracking and Command operations in the 430 through 440 MegaHertz band are capable of causing harmful interference to radio amateur communications, including to amateur satellites operating in the 435 through 438 MegaHertz subband, the comments state.

The comments go on to outline why the application would be non-compliant with the International Telecommunications Union Radio Regulations Treaty.

Reply comments to the application are due by August 5th, 2025. ARRL will continue to promote and protect the amateur radio spectrum.