

ComReg is the National Regulatory Authority for telecommunications in Ireland. Within this remit ComReg also manages Ireland's radio spectrum and numbering resource and consults on past and proposed spectrum strategies. On 10 September 2021 ComReg published in document 21/90 their proposed strategy for managing the spectrum in the years 2022 to 2024. IRTS and a number of clubs as well as individual amateur licensees submitted comments. ComReg published an assessment of these comments on 17 December 2021 in document 21/136a.

IRTS has developed a table below which hopefully explain the subjects raised by IRTS together with ComReg's take on the issue. Please note that not all amateur issues are addressed in this table since this would cause considerable repetition.

Subject	IRTS	ComReg Assessment
Novice & Entry Class Licences	Mixed views. Proposed that ComReg & IRTS should be guided by examination tender & IARU future studies	Strong support for Novice and/or ELL. Subject to resources ComReg may introduce a framework for novice licences.
Power Increase	Proposed an online project team to develop proposals.	Will consider general power increase &/or individual authorisations. All subject to NIR, spurious emissions and power measurement.
Amateur service's status in CEPT and insufficient local resources.	Difficult to get positive outcomes on amateur issues. Smaller admins say too many meetings to join project teams. Resource sharing?	ComReg not sure how resource sharing and multi country proposals would work. IRTS could further suggest an online system and ECO support.
Self regulation	IRTS explained how the 30 - 70.5 MHz consultation was carried out.	In order to facilitate self-regulation ComReg will direct licensees to adhere to IARU band plans and any applicable Irish national band plans.
SII Forum	IRTS sought membership of this Forum in order to express views on WRC preparations and other spectrum issues.	Membership of the Forum is limited to Electronic Communications Service Providers. IRTS could discuss the AREN network as a key strategic body?
WARC 79 GHz microwave allocations	IRTS requested that the 1979 microwave	ComReg has agreed to align the RFPI with the

	allocations above 75.5 GHz to the amateur and amateur-satellite services as detailed in the ECA should be included in the RFPI.	CEPT ECA during December 2021.
50 - 54 MHz Point 1	IRTS requested that at WRC-23 Ireland should seek to join the UK and 14 other CEPT countries in RR 5.166A which would provide primary status for the amateur service in the band 50.0 - 50.5 MHz.	ComReg has agreed to bring this request to the national preparatory group. IRTS will seek further clarification on the language used by ComReg in its response to this matter.
50-54 MHz Point 2	IRTS proposed that 52 - 54 MHz be allocated to the amateur service on a secondary basis in the RFPI	ComReg will consider.
50-54 MHz Point 3	Subject to Point 1 consider raising the power level to 20 dBW in the lower 500 kHz of 50 - 52 MHz	ComReg will not wait until WRC-23 to consider power levels. IRTS believes a meeting online or offline is necessary to address the complications in the range 50 - 54 MHz.
50-54 MHz Point 4	Compatibility studies concerning a new secondary allocation to the Earth exploration-satellite service for space borne radar sounders centred on 45 MHz need to avoid causing harmful interference to the amateur service above 50 MHz.	ComReg has indicated that it is aware that studies need to be conducted. IRTS is seeking ComReg support for protecting its propagation beacons close to the 50 MHz band edge.
5250 - 5450 kHz	IRTS requested the transfer of 5.280 MHz, 5.300 MHz, 5.332 MHz, 5.348 MHz, 5.400 MHz and 5.405 MHz from A1.4 to A1.3 of the Amateur Station Licence Guidelines 09/45 with the current operating conditions. This would	ComReg agreed to this proposal and will adjust the Guidelines accordingly.

	provide more flexibility to avoid primary services operating in the band 5 351.5 – 5 366.5 kHz.	
Quiet Zones 10 MHz to 144 MHz	IRTS raised the issue of how the possible establishment of Quiet Zones would impact the amateur service	ComReg stated that if Quiet zones were to be established in Ireland the intent would be to protect sensitive sites from direct interference. See https://www.craf.eu/radio-quiet-zones-around-observatories/
WRC-23	IRTS Provided the IARU position on agenda items of importance to the amateur service and requested that the views of the amateur service would be taken into account in developing the Irish national position.	ComReg agreed to relay the IRTS/IARU position into the national preparatory group.