



## Radiocommunication Bureau (BR)

Circular Letter  
CCRR/64

17 December 2019

### To Administrations of Member States of the ITU

Subject: **Draft Rules of Procedure related to satellite systems submitted by an administration acting on behalf of a group of named administrations**

At its 82<sup>nd</sup> meeting (14-17 October 2019), the Radio Regulations Board agreed on the need to develop a rule of procedure related to satellite systems submitted by an administration acting on behalf of a group of named administrations (see items A.1.f.2 and A.1.f.3 of Annex 2 to Appendix 4 (**Rev. WRC-19**)). This draft rule of procedure is contained in Annex 1.

In accordance with No. **13.17** of the Radio Regulations, the draft Rules of Procedure are made available to administrations for comments before being submitted to the RRB pursuant to No. **13.14**. As indicated in No. **13.12A d)** of the Radio Regulations, any comments that you may wish to submit should reach the Bureau not later than **24 February 2020**, in order to be considered at the 83<sup>rd</sup> meeting of the RRB, scheduled for 23 – 27 March 2020. Comments should be sent either by telefax to +41 22 730 5785 or by email to [brmail@itu.int](mailto:brmail@itu.int).

Mario Maniewicz  
Director

### Annex: 1

#### Distribution:

- Administrations of Member States of ITU
- Members of the Radio Regulations Board

## ANNEX 1

ADD

**Rules related to satellite systems  
submitted by an administration acting on behalf of a group of named administrations**

**9.1.1, 9.6.1, 11.15.1, AP4 Annex 2 items A.1.f.2 and A.1.f.3, AP30 (4.1.3, 4.1.25, 4.2.6, 5.1.1), AP30A (4.1.3, 4.1.25, 4.2.6, 5.1.2), AP30B (2.6, 6.1)**

Certain provisions of the Radio Regulations (Nos. **9.1.1, 9.6.1, 11.15.1**, Appendix **30** (§§ 4.1.3, 4.2.6 and 5.1.1, see also § 4.1.25), Appendix **30A** (§§ 4.1.3, 4.2.6 and 5.1.2, see also § 4.1.25), Appendix **30B** (§§ 2.6 and 6.1)) allow for an administration to act on behalf of a group of named administrations for the purpose of notifying the Bureau of frequency assignments to satellite systems. In such cases, the administration acting on behalf of the group is designated as the notifying administration for the group within the meaning of the Radio Regulations. These provisions share the common feature (albeit expressed in different manners) that, whenever an administration acts on behalf of a group of named administrations, all members of the group retain the right to respond in respect of their own services which could affect or be affected by the proposed assignment.

For the implementation of these provisions, symbols of “Intergovernmental satellite organizations” (see Table 2 of the Preface to the BR IFIC for Space Services), irrespective of the legal status of the group of administrations forming the entity, shall be created. Such symbols shall be submitted to the Bureau under item A.1.f.3 of Annex 2 to Appendix 4 (“if the notice is submitted on behalf of an intergovernmental satellite organization, the symbol of that organization (see the Preface)”). Satellite filings bearing such a symbol shall be treated separately from filings submitted by the notifying administration on its own behalf: the special sections of such satellite filings show the notifying administration labelled as ADM/ORG, where ADM is the symbol of the notifying administration and ORG the symbol of the intergovernmental satellite organization (instead of being simply labelled ADM). Moreover, the satellite systems of ADM shall be listed in the coordination requirements of the satellite system of ADM/ORG if the relevant coordination thresholds are exceeded. This method ensures the appropriate implementation of the right of “all members of the group (...) to respond in respect of their own services”.

In parallel, the Bureau can list several administrations under item A.1.f.2 of Annex 2 to Appendix 4 (“if the notice is submitted by the notifying administration in association with other administrations, the symbols of each of the administrations (see the Preface)”) without the creation of “Intergovernmental satellite organizations”. In these cases, the notifying administration shall be labelled ADM and no coordination requirements with other satellite systems of that notifying administration shall be considered. In other terms, the right of the notifying administration of the group to respond in respect of its own services is not applied to these cases (other administrations of the group do however retain this right).

The following table shall apply for treatment of notices submitted by an administration acting on behalf of a group of named administrations depending on whether the group is submitted through item A.1.f.2 or A.1.f.3 of Annex 2 to Appendix 4.

Note: some intergovernmental satellite organizations have more than one notifying administration. In such a case, the following table is applicable separately for each notifying administration in respect of the satellite system for which it acts as the notifying administration on behalf of the group of named administrations.

	Group of named administrations submitted through item A.1.f.2 (list of administrations)	Group of named administrations submitted through item A.1.f.3 (intergovernmental satellite organization)
<b>1. Creation of the group of named administrations</b>		
<p><u>Case 1-1</u>: the group is created when administration ADM submits a satellite system on behalf of administrations ADM, ADM_1, ADM_2, etc.</p>	<p>A special section is published with ADM as the notifying administration and administrations ADM_1, ADM_2, etc. listed under item A.1.f.2.</p> <p>In special sections where coordination requirements are listed, coordination may be required with regards to administrations ADM_1, ADM_2, etc. but not with regards to administration ADM.</p>	<p>A code ORG for the group of administrations ADM, ADM_1, ADM_2, etc. is created and inserted in Table 2 of the Preface.</p> <p>A special section is published with ADM/ORG as the notifying administration. Administrations ADM, ADM_1, ADM_2, etc. may or may not be listed in item A.1.f.2, at the request of the notifying administration.</p> <p>In special sections where coordination requirements are listed, coordination may be required with regards to administrations ADM, ADM_1, ADM_2, etc. but not with regards to ADM/ORG.</p>
<p><u>Case 1-2</u>: the group is created when notifying administration ADM, on behalf of administrations ADM, ADM_1, ADM_2, etc., requests to do so on an existing ADM satellite system.</p>	<p>A modification to the last special section of the existing satellite system is published with ADM as the notifying administration and administrations ADM_1, ADM_2, etc. listed under item A.1.f.2.</p> <p>The list of coordination requirements is unchanged.</p>	<p>A code ORG for the group of administrations ADM, ADM_1, ADM_2, etc. is created and inserted in Table 2 of the Preface.</p> <p>Modifications to all the special sections of the existing satellite system are published with ADM/ORG as the notifying administration. Administrations ADM, ADM_1, ADM_2, etc. may or may not be listed in item A.1.f.2, at the request of the notifying administration.</p> <p>Notifying administration ADM has to clarify in its request the coordination status of its other satellite systems with regards to the satellite system for which the change is requested. Depending on the information provided by administration ADM, the list of coordination requirements of the existing satellite system may have to be revised.</p>
<b>2. Modification (including closure) of the group of named administrations</b>		
<p><u>Case 2-1</u>: Administration ADM_3 joins the group</p>	<p>A modification to the last special section of the existing satellite system(s) is published with ADM as the notifying administration and administrations</p>	<p>The list of administrations for the organization ORG is updated in Table 2 of the Preface by including administration ADM_3.</p>

	<b>Group of named administrations submitted through item A.1.f.2 (list of administrations)</b>	<b>Group of named administrations submitted through item A.1.f.3 (intergovernmental satellite organization)</b>
	<p>ADM_1, ADM_2, ADM_3, etc. listed under item A.1.f.2.</p> <p>The list of coordination requirements is unchanged.</p>	<p>A modification to the last special section is necessary if a group of administrations ADM, ADM_1, ADM_2, etc. has also been listed in item A.1.f.2, at the request of the notifying administration.</p> <p>The list of coordination requirements is unchanged.</p>
<u>Case 2-2</u> : Administration ADM_1 leaves the group	<p>A modification to the last special section of the existing satellite system(s) is published with ADM as the notifying administration and administration ADM_1 removed from the list published under item A.1.f.2.</p> <p>Administration ADM annexes a copy of the letter of consent from administration ADM_1 to leave the group.</p> <p>The list of coordination requirements is unchanged.</p>	<p>The list of administrations for the organization ORG is updated in Table 2 of the Preface by removing administration ADM_1.</p> <p>A modification to the last special section is necessary if a group of administrations ADM, ADM_1, ADM_2, etc. has been listed in item A.1.f.2, at the request of the notifying administration.</p> <p>The list of coordination requirements is unchanged.</p>
<u>Case 2-3</u> : Notifying administration ADM leaves the group	<p>Notifying administration ADM cannot leave the group without suppressing the satellite system.</p>	<p>Notifying administration ADM cannot leave the group without requesting the BR, or RRB, to change the notifying administration (see Case 2-4 below).</p>
<u>Case 2-4</u> : The group decides to change its notifying administration	<p>WRC-19 decided that the Board shall deny such requests (see Section 3 of Document <a href="#">CMR19/569</a>).</p>	<p>Possible based on the Rules of Procedure concerning the treatment of change of notifying administration which acts as the notifying administration of a satellite system on behalf of a group of named administrations.</p> <p>RRB to consider the matter on a case-by-case basis if the Rules are not applicable.</p>
<u>Case 2-5</u> : The group decides to transfer the satellite system to one of its members, acting independently of the group	<p>The satellite system shall not be transferred to another notifying administration.</p>	<p>RRB to consider the matter on a case-by-case basis.</p> <p>WRC-19 confirmed the approach so far used by the Board for treating such cases and further decided that a letter from an appropriate responsible authority of this intergovernmental satellite organization is required to confirm their agreement with</p>

	<b>Group of named administrations submitted through item A.1.f.2 (list of administrations)</b>	<b>Group of named administrations submitted through item A.1.f.3 (intergovernmental satellite organization)</b>
		the change of notifying administration (see Section 3 of Document <a href="#">CMR19/569</a> ).
<u>Case 2-6</u> : The group decides to transfer the satellite system to an administration, which is not a member of the group	The satellite system shall not be transferred to another notifying administration.	The satellite system shall not be transferred to another notifying administration.  WRC-19 decided that the Board shall deny such requests (see Section 3 of Document <a href="#">CMR19/569</a> ).
<u>Case 2-7</u> : The group is discontinued	If the notifying administration ADM does not request the suppression of the satellite system(s), a modification to the last special section of the existing satellite system(s) is published with ADM as the notifying administration and all administrations removed from the list published under item A.1.f.2.  The list of coordination requirements is unchanged.	Unless for situations addressed under Case 2-5, the existing satellite systems are suppressed.
<p><b>3. Issues concerning the correspondence and regulatory actions related to a satellite system submitted on behalf of a group of named administrations</b></p> <p>Note – in treating regulatory actions affecting satellite systems submitted on behalf of an intergovernmental satellite organization, the Bureau shall exercise additional care in order to ensure that such regulatory actions, in particular partial or total suppressions, are requested on behalf of the group of named administrations.</p>		
Which administration can request regulatory actions (ADD, MOD, SUP) on the satellite system?	Only the notifying administration ADM	Only the notifying administration ADM/ORG on behalf of the group
Which administration exchanges correspondence on the satellite system with the Radiocommunication Bureau?	Only the notifying administration ADM	Only the notifying administration ADM/ORG on behalf of the group
<p><b>4. Issues related to cost recovery</b></p>		
Is a notice submitted on behalf of a group of named administrations	Yes, but only the annual free entitlement from the notifying administration can be used.	Yes, but only the annual free entitlement from the notifying administration can be used.

	<b>Group of named administrations submitted through item A.1.f.2 (list of administrations)</b>	<b>Group of named administrations submitted through item A.1.f.3 (intergovernmental satellite organization)</b>
subject to free entitlement?	Note: if the notifying administration uses a free entitlement for the group, the notifying administration cannot use the free entitlement for one of its own submissions.	Note: if the notifying administration uses the free entitlement for the group, the notifying administration cannot use the free entitlement for one of its own submissions.
Is there any cost recovery fee specifically related to the creation, modification or closure of a group of named administrations?	Such requests are currently free of charge, because it does not involve a detailed technical examination by the Bureau.	Such requests are currently free of charge, because it does not involve a detailed technical examination by the Bureau.

**Reasons:** in accordance with No. **13.12A b)**, to document the understanding of the Bureau in the implementation of data provided under items A.1.f.2 and A.1.f.3 of Annex 2 to Appendix 4.

*Effective date of application of this Rule: immediately after approval.*

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