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| **Council 2018 Geneva, 17-27 April 2018** |  |
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| **Agenda item: ADM 1** | **Document C18/83-E** |
| **3 April 2018** |
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| Note by the Secretary-General | |
| CONTRIBUTION FROM THE rUSSIAN FEDERATION | |
| COST RECOVERY FOR THE processing of complex non-geostationary  (non-GSO) satellite SYSTEM filingS | |

I have the honour to transmit to the Member States of the Council a contribution submitted by the **Russian Federation.**

Houlin ZHAO  
 Secretary-General

Russian Federation

COST RECOVERY FOR THE processing of complex non-geostationary   
(non-GSO) satellite SYSTEM filingS

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| **Summary**  The present contribution sets out the view of the Russian Federation on the question of cost recovery in connection with processing of complex non-geostationary (non-GSO) satellite system filings.  **Action required**  The Council is invited to **consider** the view of the Russian Federation set out in this document and **adopt** a decision regarding modification of Decision 482 (modified 2017).  \_\_\_\_\_\_\_\_\_\_\_\_  **References**  *Documents*[*С18/36*](https://www.itu.int/md/S18-CL-C-0036/en)*,* [*Council Decision 482 (modified 2017)*](https://www.itu.int/md/S17-CL-C-0135/en) |

Introduction

The contribution sets out the view of the Russian Federation on the question of cost recovery for the processing of complex non-GSO satellite system filings.

Discussion

In accordance with the instructions of Council 2017, the Radiocommunication Bureau carried out a study on the technical issues arising in connection with the processing of complex non-geostationary (non-GSO) satellite system filings, and analysed the main technical and regulatory issues associated with the proposal of splitting non-GSO filings containing non-homogeneous satellite orbits. On the basis of the results of the study, the Radiocommunication Bureau proposed revising Decision 482 (modified 2017) on the basis of three possible non-mutually exclusive procedures for improving the cost recovery scheme for non-GSO satellite systems:

– Procedure A: Computing separately charges for mutually exclusive configurations and adding them.

– Procedure B: Limiting the flat fee to a maximum number of units.

– Procedure C: Introducing an additional fee for cases subject to Article 22 epfd limits.

The results of the study were submitted and examined by the Radio Regulations Board (RRB), by Working Parties 4A, 4B, 4C, 7B and 7C, and submitted in Document [C18/36](https://www.itu.int/md/S18-CL-C-0036/en) for consideration by the Council.

Analysis of these procedures by ITU working bodies indicates the possibility of the Council adopting a decision at its 2018 session to apply Procedure A.

The Russian Federation, however, considers that adopting Procedure A is not sufficient to solve the problems arising in connection with the processing of complex non-geostationary (non-GSO) satellite system filings, for the following reasons:

– The number of filings for complex non-GSO systems has not been falling in recent times.

– Even a filing with a single configuration may include combinations of operating modes not typical of traditional non-GSO systems. These combinations may include splitting of orbital planes for operation with different beams.

– The time required for processing non-GSO system filings is not being reduced, obviously because of the complexity of processing large networks. Therefore an additional dissuasive factor is needed for notifications of "unrealistic" networks with large numbers of frequency assignment combinations.

The Russian Administration therefore suggests that consideration be given to the possibility of adopting Procedure B which, applied together with Procedure A, will make it possible to redress the discrepancy between the costs incurred by the Bureau in processing complex non-GSO system filings and the cost recovery for such filings. This should also reduce the time required for processing filings, as it will become economically not cost-effective to file unrealistic non-GSO systems.

It should be noted that applying Procedure A, involving separate computing of charges for mutually exclusive configurations of a non-GSO network and adding them, will act as a constraint on the maximum costs under Procedure B owing to the physical constraints that make it impossible to file an infinite number of frequency assignments in a single configuration.

In addition, in order to prevent unjustifiably high invoice fees when using Procedure B, it is possible to introduce a limit on the maximum number of units, as proposed by ITU-R Working Party 4A (Addendum 1 to Document C18/36), beyond which a flat fee will be applied.

Taking into account the limited statistical data available on the application of the epfd limits established in Article 22 of the Radio Regulations, the Russian Federation considers that it is essential to conduct additional studies as a matter of urgency on implementing Procedure C on the basis of up-to-date statistical information. Given that setting up a special group of experts to carry out such urgent studies will entail an additional financial burden for both the Radiocommunication Bureau and ITU Members, we consider that such studies can be arranged using the relevant ITU-R working parties (WP 4A, 4B, 4C, 7B and 7C) and other ITU bodies (such as RRB and CWG-FHR) in accordance with their respective terms of reference. The Russian Federation is of the view that there should also be discussion of conditions for applying Procedure C to those filings that have been received by BR but have not been checked for compliance with Article 22 epfd limits at the time of entry into force of Procedure C.

Conclusion

The Russian Federation considers that adopting proposals on modifying Decision 482 (modified 2017) in order to implement Procedures A and B, as proposed by the Radiocommunication Bureau in Document [C18/36](https://www.itu.int/md/S18-CL-C-0036/en) and supplemented by ITU-R WG 4A, will help to redress the discrepancy between the costs to the Bureau of processing filings for complex non-GSO systems and cost recovery for such filings. In addition, this will help to reduce the time needed to process filings, as it will not be cost effective in economic terms to file unrealistic non-GSO systems.

As regards Procedure C the Russian Federation considers that urgent additional studies are needed with the help of relevant ITU-R working parties (WP 4A, 4B, 4C, 7B and 7C) and other ITU bodies (such as RRB and CWG-FHR) in accordance with their respective terms of reference, in order to come to a considered decision on cost recovery for processing filings for complex non-GSO systems.

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