



Radiocommunication Bureau (BR)

Circular Letter
CR/519

10 June 2025

To the Administrations of ITU Member States

Subject: **Implementation of No. 11.28.1 of the Radio Regulations, as modified by the World Radiocommunication Conference 2023**

The World Radiocommunication Conference (Dubai, 2023) (WRC-23) modified provision No. **11.28.1** of the Radio Regulations (RR), with a date of entry into force of the modified provision on 1st January 2025.

According to the modified provision adopted by WRC-23, an administration believing that unacceptable interference may be caused to its existing or planned satellite networks or systems by submitted modifications to the characteristics initially published under No. **9.2B** may provide its comments to the notifying administration with copy to the Bureau and the Bureau shall publish any such comments received on its website.

In this regard, the Radiocommunication Bureau is pleased to provide the following information concerning the implementation of No. **11.28.1**, particularly concerning the submission of the comments and the publication of the received comments:

- The modified provision No. **11.28.1** shall apply to comments on notification of satellite networks or systems not subject to the coordination procedure under Section II of Article 9, for which the date of receipt is on or after 1 January 2025.
- The comments can be made on a Part I-S publication of a notification when there are modifications to the characteristics previously published under No. **9.2 B** (API), if an administration believes that unacceptable interference may be caused to its satellite networks or systems by these modifications.
- The comments on the Part I-S publication shall be sent by the commenting administration to the notifying administration of the satellite network or system, as well as recorded in the SpaceCom software and submitted via the e-Submission system to the Bureau.
- The SpaceCom software and the e-Submission system have been updated to allow administrations to capture and submit comments when the Space Network System database version 10.0 (SNS 10.0) was introduced. Please refer to Annex 1 for the updated interface of the SpaceCom software that accommodates comments under No. **11.28.1**.

More detailed information can also be found in the following webpage:

<https://www.itu.int/go/spacecomments/part1s>

- The comments submitted via the e-Submission system are published as received on the ITU As Received webpage:

<https://www.itu.int/ITU-R/space/asreceived/Publication/AsReceived>

- A consolidation of all the comments on a Part I-S notification notice received during a 4-month period from the date of publication of the notification notice will be carried out by the Bureau, aligning with the period for commenting on API/A under No. **9.3**. This consolidated information will be published on a dedicated ITU webpage:

<https://www.itu.int/go/spacecomments/part1s>

- Comments submitted to the Bureau via the e-Submission system more than 4 months after the date of publication of a Part I-S notification notice will only be published as received by the Bureau.

Support and Contacts

The Bureau remains at your administration's disposal, via e-mail brmail@itu.int, for any clarification it may require with respect to the content of this circular letter.

Queries relating to the software's installation and functionality may be addressed to the following e-mail address: brsas@itu.int.

Mario Maniewicz
Director

Annex 1 (1 page)

Distribution:

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

Annex 1

New interface for commenting under No. 11.28.1 in the SpaceCom software

The interface to capture comments to Part I-S under No. **11.28.1** can be accessed by clicking the “11.28.1 Part I-S” button at the bottom of the main page of the latest version of the SpaceCom software.

