



Radiocommunication Bureau (BR)

Circular Letter
CR/522

25 August 2025

To Administrations of Member States of the ITU

Subject: **Advance publication of information and notification of satellite networks or systems that are not subject to the coordination procedure under Section II of Article 9 of the Radio Regulations**

Submission of the Advance Publication Information

As indicated in Sub-Section IA of Article 9 of the Radio Regulations, the submission of an Advance Publication of Information (API) is followed by a commenting procedure, which aims at minimizing unacceptable interference prior to operations.

In accordance with No. 9.3 of the Radio Regulations, administrations that believe interference from a new incoming satellite system may be unacceptable and could impact their existing or planned satellite networks or systems can submit their comments to the notifying administration within four months of the date of publication of the API/A special section in the BR IFIC.

Thereafter, both the notifying administration and the administrations that provided comments shall endeavour to cooperate through joint efforts to resolve any difficulties and exchange any additional relevant information.

The Radiocommunication Bureau has noted a recurring issue where notifying administrations submit APIs with little lead time before the launch of their satellite networks or systems.

This limited time between the API submission and the launch would not allow sufficient time for the publication of the API, the 4-month commenting process and the consultation process between administrations, that are required under No. 9.3, to take place and be effective, prior to the launch of the planned satellite networks or systems and subsequent bringing into use of the frequency assignments.

Therefore, it is important that notifying administrations, when submitting an API for their planned satellite networks or systems, take the No. 9.3 consultation process into account, and ensure that sufficient time is allocated. This consultation process is important to effectively address potential interference issues between the satellite networks or systems of the notifying administrations with those of administrations that provided comments.

Ideally, this phase of the procedure should be initiated as early as possible during the satellite project (but not later than 7 years before the planned date of bringing into use) and well before the launch of the planned satellite networks or systems.

At the latest, considering the various regulatory periods: the two-month time for publication of the API following the API submission (No. **9.2B**), the four-month time for commenting (No. **9.3**) and possibly the time for publication of the list of comments (No. **9.5**), it would be reasonable to submit the API information with a minimum lead time of 9 months to 1 year before the launch.

The Bureau takes this opportunity to reiterate and emphasize the importance of carrying out the API procedure in a timely manner, providing sufficient time for each phase of the process before bringing into use the planned satellite network or system.

Notification of Frequency Assignments Under Article 11 of the Radio Regulations and Communication of the Date of Bringing into Use

Following the API procedure, the frequency assignments to satellite networks or systems should be notified in accordance with Article **11** of the Radio Regulations, in order to be recorded in the Master International Frequency Register (MIFR).

Under No. **8.1** of the Radio Regulations, the international rights and obligations of administrations in respect of their own and other administrations' frequency assignments shall be derived from the recording of those assignments in the MIFR. Once recorded with favourable findings, the assignments acquire the right to international recognition, which in turn obligates other administrations to take these assignments into account when making their own, in order to avoid harmful interference (see No. **8.3**).

Therefore, it would be in the best interest of all administrations to notify their frequency assignments.

Furthermore, at the notification stage, the notifying administration can provide updated information should there be late modifications to the satellite network or system other than those described in No. **9.2**. No. **11.28.1** of the Radio Regulations, in this regard, enables other administrations to address interference issues resulting from the modifications, and supports the continued resolution of difficulties between the administrations.

While No. **11.44.1** specifies a regulatory period of seven years within which the first notice of recording the assignments of a satellite network or system should be submitted, the notification additionally serves to communicate the date of bringing into use of the satellite networks or systems.

In order for other administrations to be aware and informed in advance of when a satellite network or system is brought into use, the submission of a notice for recording under Article **11** by the notifying administration is encouraged to be made either in advance of the planned date of bringing the satellite network or system into use or, at the latest, at the time of bringing into use.

Additionally, notifying the date of bringing into use allows the Bureau to carry out procedures under No. **13.6**, ensuring the efficient and legitimate use of radio frequencies and orbits.

In view of the above considerations, administrations are urged to carry out the notification procedure and communicate the date of bringing into use in a formal submission of the notice under Article **11** in advance of their bringing in to use, or at the latest, at the time of bringing into use, so that this information can be made available to all administrations for effective management, coordination and sharing of the radio frequency spectrum and orbital resources.

Maintenance of the MIFR

When a frequency assignment or the entire filing is no longer applicable or no longer in use, administrations are encouraged to inform the Bureau and to request the suppression of this information from the Master International Frequency Register (MIFR).

This voluntary communication is vital for maintaining the accuracy and reliability of the MIFR, which serves as an essential reference for international radio frequency management and coordination. It will help ensure that the data contained within the MIFR remains current, reliable, and free from outdated or obsolete entries, which may otherwise hinder effective decision-making and prolong the consultation process.

This is especially important for non-geostationary satellite (non-GSO) networks and systems, which typically have shorter operational lifespans than GSO satellite networks and systems, making timely removal of obsolete filings and frequency assignments essential to maintaining accuracy of the MIFR information.

The Bureau, therefore, invites administrations to notify the Bureau of any filings and frequency assignments that are no longer in use.

Summary

In the light of the above considerations, administrations are to recognize the importance of the regulatory framework outlined in Articles **9** and **11** of the Radio Regulations. Carrying out and complying with these procedures is essential to ensure the long-term viability of radiofrequency spectrum and orbital resources. Administrations are also encouraged to inform the Bureau of any filings and frequency assignments that are no longer in use in order to keep the MIFR up to date.

Mario Maniewicz
Director

Distribution:

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