



## Radiocommunication Bureau (BR)

Circular Letter  
**CR/527**

20 January 2026

### To Administrations of Member States of the ITU

Subject: **Minutes of the 100<sup>th</sup> meeting of the Radio Regulations Board**

Pursuant to the provisions of Nos. **13.18** of the Radio Regulations and in accordance with §1.10 of Part C of the Rules of Procedure, please find attached the approved minutes of the 100<sup>th</sup> meeting of the Radio Regulations Board (10 – 14 November 2025).

These minutes were approved by the Members of the Radio Regulations Board by electronic means and are available on the RRB pages of the ITU web site.

Mario Maniewicz  
Director

Annex: Minutes of the 100<sup>th</sup> meeting of the Radio Regulations Board

**Distribution:**

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



**Radio Regulations Board**  
**Geneva, 10–14 November 2025**



**Document RRB25-3/34-E**  
**28 November 2025**  
**Original: English**

MINUTES\*  
OF THE  
100<sup>th</sup> MEETING OF THE RADIO REGULATIONS BOARD  
10–14 November 2025

Present: Members, RRB

Mr A. LINHARES DE SOUZA FILHO, Chair

Ms S. HASANOVA, Vice-Chair

Mr A. ALKAHTANI, Mr E. AZZOUZ, Ms C. BEAUMIER, Mr J. CHENG, Mr M. DI CRESCENZO,  
Mr E.Y. FIANKO, Mr Y. HENRI, Ms R. MANNEPALLI, Mr R. NURSHABEKOV, Mr H. TALIB

Executive Secretary, RRB

Mr M. MANIEWICZ, Director, BR

Précis-writers

Ms S. MUTTI, Ms L. MUNSLOW and Ms C. RAMAGE

Also present: Ms D. TOMIMURA, Deputy Director, BR, and Chief, IAP  
Mr A. VALLET, Chief, SSD  
Mr J.A. CICCOROSSI, Head, SSD/SSS  
Mr C. LOO, Head, SSD/CSS  
Mr D. THAM, Head, SSD/USS  
Mr J. WANG, Head, SSD/SPS  
Mr A. KLYUCHAREV, SSD/SPS  
Mr N. VASSILIEV, Chief, TSD  
Mr B. BA, Head, TSD/TPR  
Ms I. GHAZI, Head, TSD/BCD  
Mr C. RYU, TSD/FMD  
Mr K. BOGENS, Head, TSD/FMD  
Ms K. GOZAL, Administrative Secretary

\* The minutes of the meeting reflect the detailed and comprehensive consideration by the members of the Radio Regulations Board of the items that were under consideration on the agenda of the 100<sup>th</sup> meeting of the Board. The official decisions of the meeting can be found in Document RRB25-3/33.

Subjects discussed	Documents
1 Opening of the meeting	-
2 Adoption of the agenda	<a href="#">RRB25-3/OJ/1(Rev.2)</a> ; <a href="#">RRB25-3/DELAYED/9</a>
3 Report by the Director, BR	<a href="#">RRB25-3/11</a> <a href="#">RRB25-3/11(Add.1)</a> <a href="#">RRB25-3/11(Add.2)</a> <a href="#">RRB25-3/11(Add.3)</a> <a href="#">RRB25-3/11(Add.4)</a> <a href="#">RRB25-3/11(Add.5)</a> <a href="#">RRB25-3/11(Add.6)</a>
4 Rules of Procedure	-
4.1 List of proposed rules of procedure	<a href="#">RRB25-3/1</a> <a href="#">RRB24-1/1(Rev.5)</a>
4.2 Draft rules of procedure	<a href="#">CCRR/79</a>
4.3 Comments from administrations	<a href="#">RRB25-3/14</a>
4.4 Submission by the Administration of the United States regarding the timing of Working Party 4A review of the draft rule of procedure on No. <b>13.6</b>	<a href="#">RRB25-3/12</a>
4.5 Submission by the Administration of Australia regarding the consideration of the draft rules of procedure on No. <b>13.6</b>	<a href="#">RRB25-3/18</a>
5 Request for the cancellation of the frequency assignments to satellite networks under No. <b>13.6</b> of the Radio Regulations	-
5.1 Request for a decision by the Radio Regulations Board to cancel frequency assignments to the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks at 113°W under No. <b>13.6</b> of the Radio Regulations	<a href="#">RRB25-3/17</a>
6 Requests to extend the regulatory time-limit to bring into use/bring back into use the frequency assignments to satellite networks/systems	-
6.1 Submission by the Administration of the United Kingdom of Great Britain and Northern Ireland requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the GANTS-2 and GANTS-3 satellite networks	<a href="#">RRB25-3/9</a> , <a href="#">RRB25-3/30</a>
6.2 Submission by the Administration of Indonesia requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the NUSANTARA-NS1-A (113°E) satellite network	<a href="#">RRB25-3/15</a>
6.3 Submission by the Administration of India requesting an extension of the regulatory time-limit to bring back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network	<a href="#">RRB25-3/19</a> <a href="#">RRB25-3/DELAYED/7</a>
6.4 Submission by the Administration of the Islamic Republic of Iran requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the IRANDBS4-KA-G2 satellite network	<a href="#">RRB25-3/20</a>
6.5 Submission by the Administration of the Republic of Korea requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the KOMPSAT-6 satellite network	<a href="#">RRB25-3/21</a>

Subjects discussed	Documents
6.6 Submission by the Administration of the Islamic Republic of Iran requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the IRN-TTC-34 satellite network	<a href="#">RRB25-3/23</a> <a href="#">RRB25-3/DELAYED/8</a>
6.7 Submission by the Administration of the Sultanate of Oman requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the OMANSAT-73.5E satellite network	<a href="#">RRB25-3/27</a> <a href="#">RRB25-3/DELAYED/3</a>
7 Submission by the Administration of Cyprus requesting regulatory leniency to bring into use and bring back into use the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks at 89.5°E	<a href="#">RRB25-3/2</a> , <a href="#">RRB25-3/16</a>
Submission by the Administration of Malaysia in response to the submission by the Administration of Cyprus requesting regulatory leniency to bring into use and bring back into use the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks at 89.5°E	<a href="#">RRB25-3/6</a> <a href="#">RRB25-3/DELAYED/2</a>
8 Submission by the Administration of Canada requesting an extension of the first milestone period (M1) for the MULTUS satellite system	<a href="#">RRB25-3/5</a> , <a href="#">RRB25-3/24</a>
9 Submission by the Administration of Nigeria requesting to retain the frequency assignments to the NIGCOMSAT-2D satellite network	<a href="#">RRB25-3/31</a> <a href="#">RRB25-3/DELAYED/5</a>
10 Cases of harmful interference	-
10.1 Issues regarding harmful interference to emissions of high frequency broadcasting stations published in accordance with RR Article 12	-
Submission by the Administration of the United Kingdom of Great Britain and Northern Ireland regarding harmful interference to emissions of its high frequency broadcasting stations published in accordance with RR Article 12	<a href="#">RRB25-3/3</a> , <a href="#">RRB25-3/4</a> , <a href="#">RRB25-3/10</a>
Submission by the Administration of China (People's Republic of) in response to the submissions by the United Kingdom of Great Britain and Northern Ireland regarding harmful interference to emissions of its high frequency broadcasting stations published in accordance with RR Article 12	<a href="#">RRB25-3/8</a> , <a href="#">RRB25-3/28</a> <a href="#">RRB25-3/DELAYED/1</a>
10.2 Submission by the Administration of the Russian Federation regarding harmful interference to its satellite networks	<a href="#">RRB25-3/26</a> <a href="#">RRB25-3/DELAYED/4</a>
11 Submission by the Administration of the Dominican Republic on the situation in the FM sound broadcasting band on the border between the Dominican Republic and the Republic of Haiti	<a href="#">RRB25-3/7</a>
12 Issues regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran	-
Submission by the Administration of the Islamic Republic of Iran regarding the provision of Starlink satellite services in its territory	<a href="#">RRB25-3/22</a>
Submission by the Administration of Norway regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran	<a href="#">RRB25-3/29</a>

Subjects discussed	Documents
Submission by the Administration of the United States regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran	<a href="#">RRB25-3/32</a> <a href="#">RRB25-3/DELAYED/6</a>
13 Submission by the Administration of Canada requesting clarification on the application of Resolutions <b>8 (WRC-23)</b> and <b>35 (Rev.WRC-23)</b> to non-geostationary-satellite networks during the milestone process	<a href="#">RRB25-3/25</a>
14 Election of the Vice-Chair for 2026	-
15 Confirmation of the next meeting for 2026 and indicative dates for future meetings	-
16 Other business	-
17 Approval of the summary of decisions	-
18 Closure of the meeting	-

## 1 Opening of the meeting

1.1 The **Chair** opened the historic 100<sup>th</sup> meeting of the Radio Regulations Board at 0900 hours on Monday, 10 November 2025. He welcomed the participants and noted with satisfaction that the Director and Mr Henri were able to attend in person. He looked forward to a productive meeting with the support of all involved.

1.2 The **Secretary-General** said that it was a pleasure for her to join the Board's 100<sup>th</sup> meeting – a milestone grounded in more than a century of shared endeavour. When nations had met in Berlin in 1906 to sign the first international radiotelegraph convention, they had agreed even then that radio must serve the common good through technical cooperation and had sought to regulate so that ship-to-shore communications could pass freely and without interference. Recalling the steps leading to the establishment of the Radio Regulations Board, she said that, since its first meeting, in February 1995, the Board had set a tone of both fairness and cooperation and held the conviction that, while technologies evolved, the values of collaboration, foresight and equity remained constant. Although seemingly technical, the Board's work to maintain the invisible world that powered everything from mobile phones to disaster response had a deeply human impact, and the central question of sharing spectrum and resources for the benefit of all had, in many ways, remained unchanged since 1906.

1.3 In 2025, the importance of the Board's role had been brought into sharp focus with the surge in jamming and spoofing of signals affecting the radionavigation satellite service (RNSS). The number of reports remained significant and had been 14 per cent higher between January and October 2025 than over the same period the previous year. The Board's work to mediate between administrations and maintain confidence in the unseen infrastructure that kept the increasingly digital world functioning was critical to prevent chaos. It also served as a reminder that cooperation remained the driving force behind shared work. The Board would be central in ensuring that new technological advances did not deepen digital divides but rather expanded access and opportunity, especially for developing countries seeking equitable access to spectrum and space resources.

1.4 She sincerely thanked all Board members, past and present, for their service, expertise and commitment to keep humanity connected and wished the Board a productive meeting.

1.5 The **Director of the Radiocommunication Bureau** expressed satisfaction that he and Mr Henri were able to participate in person. He thanked the Secretary-General for addressing the Board's symbolic 100<sup>th</sup> meeting and for recognizing the Board's important work. While the Board was facing issues that were more difficult to resolve, its commitment and effort remained unchanged.

## 2 Adoption of the agenda (Documents [RRB25-3/OJ/1\(Rev.2\)](#) and [RRB25-3/DELAYED/9](#))

2.1 **Mr Bogens (Head, TSD/FMD)** drew the Board's attention to two further addenda from the Bureau to the Director's report (Addenda 4 and 5 to Document RRB25-3/11). Addendum 4 contained an updated report concerning harmful interference to receivers in the RNSS. Addendum 5 reported on the meetings between the Administrations of France, the Russian Federation and Sweden concerning harmful interference affecting satellite networks notified by the Administration of France on its own behalf or acting as a notifying administration of the intergovernmental organization EUTELSAT and satellite networks notified by the Administration of Sweden. The Board might wish to consider both addenda alongside the Report by the Director under agenda item 3.

2.2 He further drew attention to seven late submissions (Documents RRB25-3/DELAYED/1 to 7). In response to a query from the **Chair**, he added that all the delayed documents had been received in accordance with the appropriate regulatory deadline under § 1.6 of the Board's internal arrangements and working methods (Part C of the Rules of Procedure). Document RRB25-3/DELAYED/1 had been received from the Administration of China in response to the submissions from the Administration of the United Kingdom under agenda item 10.1. The Board might therefore wish to consider it for information under agenda item 10.

2.3 Document RRB25-3/DELAYED/2 had been received from the Administration of Malaysia in response to the submission from the Administration of Cyprus under agenda item 7. The Board might therefore wish to consider it for information under that item.

2.4 Document RRB25-3/DELAYED/3 had been received from the Administration of Oman and supplemented the contents of that administration's submission under agenda item 6.7.

2.5 Document RRB25-3/DELAYED/4 had been received from the Administration of Ukraine in response to the submission by the Administration of the Russian Federation under agenda item 10.2.

2.6 Document RRB25-3/DELAYED/5 had been received from the Administration of Nigeria and supplemented the contents of that administration's submission under agenda item 9.

2.7 Document RRB25-3/DELAYED/6 had been received from the Administration of the Islamic Republic of Iran and supplemented the information in that administration's submission under item 12. It also responded to the submission by the Administration of the United States under the same agenda item.

2.8 Document RRB25-3/DELAYED/7 had been received from the Administration of India and supplemented the contents of that administration's submission under agenda item 6.3.

2.9 **Mr Vallet (Chief, SSD)** drew attention to two further documents received by the Bureau over the weekend, namely a letter from the Administration of Israel providing additional information on cases of harmful interference to receivers in the RNSS, as requested by the Board at its previous meeting; and an additional delayed submission from the Administration of the Islamic Republic of Iran supplementing the contents of that administration's submission under agenda item 6.6. He asked how the Board wished to proceed in regard to those documents.

2.10 The **Director**, noting that the submission of the Administration of Israel had been addressed not only to himself but also to the Chair of the Board, said that both documents were intended for the Board's consideration.

2.11 **Mr Azzouz** said that the submission of the Administration of Israel responded to a decision of the Board at its previous meeting and should be included as Addendum 6 to the Director's report. The additional submission from the Administration of the Islamic Republic of Iran should be considered for information as Document RRB25-3/DELAYED/8 under agenda item 6.6. **Mr Talib** agreed.

2.12 **Mr Cheng** said that it would be more efficient to discuss agenda items 6.4 and 6.6 (requests for extension from the Administration of the Islamic Republic of Iran) consecutively.

2.13 **Ms Beaumier** said that she was unsure whether Document RRB25-3/DELAYED/6 was compliant with the 10-day deadline provided for in § 1.6 of the Board's internal arrangements and working methods. That submission (dated 5 November) was responding to a submission received before the 20 October 2025 deadline but posted only on 28 October 2025. It was not reasonable to expect administrations to prepare a response in only two days (i.e. before 30 October 2025, the date of expiry of the 10-day deadline), and for that reason, she would have no objection to the Board considering Document RRB25-3/DELAYED/6 for information under agenda item 12.

2.14 In a subsequent discussion, the **Chair** informed the Board that the Bureau had received another late submission after the start of the meeting and after the agenda had been adopted. The document had been published as Document RRB25-3/DELAYED/9. Recalling § 1.6 of the Board's internal arrangements and working methods, he said that, as there were no exceptional circumstances, the late submission would not be considered at the current meeting.

2.15 The **Chair** proposed that the Board should conclude as follows:

"The draft agenda was adopted as amended in Document RRB25-3/OJ/1(Rev.2). The Board decided to note for information:

- Document RRB25-3/DELAYED/1 under agenda item 10;
- Document RRB25-3/DELAYED/2 under agenda item 7;
- Document RRB25-3/DELAYED/3 under agenda item 6.7;

- Document RRB25-3/DELAYED/4 under agenda item 10.2;
- Document RRB25-3/DELAYED/5 under agenda item 9;
- Document RRB25-3/DELAYED/6 under agenda item 12;
- Document RRB25-3/DELAYED/7 under agenda item 6.3;
- Document RRB25-3/DELAYED/8 under agenda item 6.6.

Document RRB25-3/DELAYED/9 had been received but not considered by the Board, in accordance with § 1.6 of Part C of the Rules of Procedure."

2.16 It was so **agreed**.

**3 Report by the Director, BR (Documents [RRB25-3/11](#), [RRB25-3/11\(Add.1\)](#), [RRB25-3/11\(Add.2\)](#), [RRB25-3/11\(Add.3\)](#), [RRB25-3/11\(Add.4\)](#), [RRB25-3/11\(Add.5\)](#) and [RRB25-3/11\(Add.6\)](#))**

3.1 The **Director** introduced his customary report in Document RRB25-3/11. All the actions arising from the previous Board meeting set out in Table 1 had been implemented.

3.2 Referring to § 2 of the report, he said that, as detailed in § 2.1.2, the Bureau had reviewed the findings for 6 490 assignments to stations of fixed and mobile services recorded in the Master International Frequency Register (MIFR) in the light of WRC-23 decisions. Turning to the tables set out in § 2.2 of the report, he said that processing times for all Special Sections except the publication of coordination requests were within the specified regulatory period. Drawing attention to Table 2-6, on coordination requests publication, he said that the number of networks under treatment had been decreasing since May 2025 as a result of the Bureau's efforts to address the backlog. However, those efforts were in danger given the current budgetary uncertainty and recruitment freeze. Without proper staffing, the Bureau would not be able to clear the backlog in a timely manner.

3.3 Referring to § 4, he said that statistics concerning reports of harmful interference and/or infringements of the Radio Regulations (RR) during the reporting period were quite typical. Further information from the Bureau on specific cases concerning space services (Table 4-3) was provided in Addenda 4 and 5 to the report. Turning to § 4.1 on harmful interference to broadcasting stations in the VHF/UHF bands between Italy and its neighbouring countries, he said that information on the multilateral frequency coordination meeting organized by the Bureau in October was contained in Addendum 1 to the report. In general, progress related to the FM interference situation was quite limited. While there had been some progress relating to DAB broadcasting, notably in regard to the Adriatic-Ionian agreement, certain issues persisted.

**Actions arising from the previous RRB meeting (§ 1 of Document RRB25-3/11)**

3.4 **Mr Vallet (Chief, SSD)** confirmed that all actions arising from the previous Board meeting in respect of space services had been implemented. Referring to § 3 a) of Table 1-1, he said that the Bureau had published on its website the revised version of the dedicated webpage to provide relevant information on cases of harmful interference affecting the RNSS. There had been some exchange of information and communications between the Administrations of Egypt, Jordan and Israel, and the Israeli Administration had taken some steps to minimize interference, as detailed in Addendum 6 to the report.

3.5 **Mr Vassiliev (Chief, TSD)** confirmed that all actions arising from the previous Board meeting in respect of terrestrial services had been implemented.

3.6 **Mr Wang (Head, SSD/SPS)**, responding to a question from **Mr Azzouz** regarding § 10 of Table 1-1, confirmed that the Bureau had received all eight submissions under Resolution **170 (Rev.WRC-23)** and had resolved the issue of the notifying administration for those submissions. The submissions had been examined, the Bureau had received a reply to its enquiry, and the network would be published in January

2026. After the Part B stage, the administrations of the Southern African Development Community Member States would choose one orbital position.

3.7 The Board **noted** all the action items under § 1 of Document RRB25-3/11 arising from the decisions of the 99<sup>th</sup> Board meeting.

#### **Processing of filings for terrestrial and space systems (§ 2 of Document RRB25-3/11)**

3.8 **Mr Vassiliev (Chief, TSD)** outlined the information contained in the tables on the processing of notices to terrestrial services in § 2.1 of Document RRB25-3/11. As detailed in § 2.1.2, the Bureau had conducted a review of findings for 5 032 assignments to stations of fixed and mobile services in the frequency bands for which the allocation situation had changed following WRC-23 decisions. It had also reviewed the findings for 1 458 mobile service assignments of the Administration of the Republic of Korea in the light of the WRC-23 decision concerning the calculation of power to antenna for active antenna systems.

3.9 **Mr Vallet (Chief, SSD)** drew attention to the tables on the processing of space notices in § 2.2 of the same document. As shown in Table 2-5, the regulatory time-limit for the processing of the API for satellite networks was now being met, as a result of the Bureau's efforts to reduce the treatment time. Turning to Table 2-6 on publication of coordination requests, he said that treatment time was decreasing, as was the number of filings under treatment. Those elements should be considered together in order to obtain a better understanding of how the backlog was progressing. The Bureau's efforts to reduce treatment time, which currently stood at 14 months, were, however, under threat because of the ITU budgetary uncertainty and recruitment freeze. Treatment times regarding the processing of satellite networks under Appendices **30**, **30A** and **30B** were within the six-month period specified in the Bureau's operational plan, and processing times for Part I-S and Part II-S/Part III-S examinations for satellite networks under Article **11** were relatively low. Referring to Table 2-11, he noted that the number of earth stations received varied considerably by month.

3.10 **Ms Beaumier** said that, while she was pleased that treatment times had begun to decrease, especially for coordination requests for satellite networks, it was worrisome that the progress might not be sustained given the Bureau's current recruitment restrictions. Noting that over a year had elapsed since the four-month regulatory time-limit under No. **9.38** had last been respected, she said that the backlog was beginning to cause difficulties for the membership. Although members might have some patience for delays caused by temporary surges in the number of networks received, they would expect the backlog to reduce over time and the regulatory deadline to be met. The Board should therefore encourage the Bureau to try to return to compliance with the regulatory time-limits.

3.11 **Mr Vallet (Chief, SSD)**, responding to a question from **Ms Beaumier** concerning Table 2-11, confirmed that the fluctuations in the number of Part I-S examinations under treatment and the treatment time were due to the variations in the number of earth stations received. Only a certain number of earth stations could be processed at a time, and the number of earth stations received often exceeded the number that could be published, leading to an increase in Part I-S examinations under treatment.

3.12 The **Director** said that work was ongoing on the biennial budget for 2026–2027: the management of the Union had been tasked with identifying further cost savings, and recruitment had been frozen. The Bureau was trying to avoid making cuts across the board and to prioritize the core functions of ITU. Once the 2026 budget had been approved, the Bureau would be able to make a clearer impact assessment and evaluate its capacity to reduce the backlog.

3.13 **Mr Henri** pointed out that the Radio Regulations constituted an international treaty, binding on all Member States, with specific tasks and responsibility for the Bureau. Although understanding the difficulties leading to the relatively lengthy backlog in the treatment time for coordination requests, compounded by possible recruitment restrictions, he expressed the worry that members and operators would gradually lose interest in the registration of satellite network or system procedures under the Radio Regulations and in ITU's crucial role in managing frequency issues, due to the backlog in treatment.

3.14 **Mr Vallet (Chief, SSD)**, responding to a question from **Mr Henri** concerning Table 2-12, said that the backlog in the Part II-S/Part III-S examination of notifications pertaining to earth stations under Article **11** was driven by cases related to disputed territories, some of which had been pending since 2015. There was no

backlog in regard to radio astronomy stations. While it was common to have several cases awaiting the notification of the associated space stations, those cases did not tend to influence the backlog. The Bureau would be reviewing some cases involving disputed territories in the coming months in the light of the Board's previous decisions on certain disputed territories.

3.15 The **Chair** proposed that the Board should conclude as follows on § 2 of Document RRB25-3/11:

"The Board noted § 2 of Document RRB25-3/11, on the processing of filings for terrestrial and space systems, and encouraged the Bureau to continue to make all efforts to process such filings within the regulatory time-limits.

On the review of findings of terrestrial frequency assignments recorded in the Master International Frequency Register, the Board expressed satisfaction at the implementation of the instruction by the 90<sup>th</sup> meeting with respect to the review of findings for 1 458 assignments of the Administration of the Republic of Korea in the frequency band 24.45–27.5 GHz and of findings for 5 032 assignments to stations of the fixed and mobile services in frequency bands for which the allocation situation had been changed as a result of WRC-23 decisions.

On the processing time for coordination requests related to space services, despite continuous improvement since June 2025, the Board noted the slow progress in reducing the backlog, which still exceeded the 4-month regulatory period set out in No. **9.38** of the Radio Regulations. The Board expressed concern that the current ITU budgetary situation might lead to a lack of adequate resources for processing satellite network filings and emphasized the requirement for the Bureau to be funded at a level consistent with the performance of its duties under the Radio Regulations."

3.16 It was so **agreed**.

#### **Implementation of cost recovery for satellite network filings (§ 3 of Document RRB25-3/11)**

3.17 **Mr Vallet (Chief, SSD)**, drawing attention to § 3.1 of Document RRB25-3/11, said that three of the four satellite network filings cancelled as a result of non-payment and listed in Table 3-2 were from the Administration of the United States. There had been a number of such cases, and the Financial Resources Management Department had raised the issue with that administration. According to Council Decision 482, the amount remained due from the notifying administration and would therefore be added to the debt of the Administration of the United States.

3.18 **Mr Vallet (Chief, SSD)** drew attention to § 3.2 of Document RRB25-3/11, on Council activities. Recalling that the revised version of Decision 482 (C01, last amended C25) would enter into force on 1 January 2026, he said that a test version of the updated software would be made available to administrations on 11 November. With regard to the recovery of indirect costs associated with the processing of satellite network filings, the 2025 Council session had agreed that in 2026 and 2027 all fees provided for by Decision 482 would be increased by around 10 per cent. The Council Working Group on financial and human resources, which was tasked with devising a methodology for recovery of indirect costs, would be holding an information session on 16 December. The Council was expected to revise Decision 482 once again at its session in 2027.

3.19 The Board **noted** §§ 3.1 and 3.2 of Document RRB25-3/11, on late payments and Council activities, respectively, relating to the implementation of cost recovery for satellite network filings.

#### **Reports of harmful interference and/or infringements of the Radio Regulations (Article 15 of the Radio Regulations) (§ 4 of Document RRB25-3/11)**

3.20 **Mr Vassiliev (Chief, TSD)**, drawing attention to the tables in § 4 of Document RRB25-3/11, said that the Bureau had received 578 communications concerning harmful interference and/or infringements of the Radio Regulations in the reporting period.

3.21 **Mr Vallet (Chief, SSD)**, drawing attention to Table 4-3, said that the number of cases of harmful interference concerning space services had returned to normal levels over previous months. Addenda 4 to 6 to the Director's report provided updates on certain cases and would be considered later in the meeting.

3.22 The Board **noted** § 4 of Document RRB25-3/11, containing statistics on harmful interference and infringements of the Radio Regulations.

**Harmful interference to broadcasting stations in the VHF/UHF bands between Italy and its neighbouring countries (§ 4.1 of, and Addenda 1, 2 and 3 to, Document RRB25-3/11)**

3.23 **Ms Ghazi (Head, TSD/BCD)** introduced Addendum 1 to Document RRB25-3/11, which reported on the multilateral frequency coordination meeting held between the Administrations of Croatia, France, Italy, Malta, Slovenia and Switzerland, on 1 and 2 October 2025. No major progress had been made since the previous multilateral meeting in May 2024. The Italian Administration had not been able to provide the list and technical characteristics of Italian broadcasting stations interfering with neighbouring stations on the priority lists, citing database format incompatibilities.

3.24 With regard to the status of interference to FM stations on the priority lists, the Administration of Italy had drawn attention to the litigation that followed in the wake of administrative ordinances requiring changes to FM stations to resolve cases of international interference. The courts often ruled in favour of the operators, effectively rejecting the action proposed, and did not automatically consider the interference measurements submitted by a foreign administration to be valid. The administration had informed the meeting of the intention of the relevant Italian Ministry to establish a new legal and technical framework and to allocate an annual compensation fund from savings made to encourage the voluntary return of FM licences from identified operators.

3.25 The report also summarized the interference situation between the Administration of Italy and the Administrations of Croatia, France, Malta, Slovenia and Switzerland. While harmful interference cases with some neighbouring countries had persisted for years, the Administrations of France and Italy had reached a consensus on the methodology for the compatibility analysis. Moreover, the Administration of Switzerland had informed the meeting that the public broadcaster had lost more than 30 per cent of listeners in the transition to DAB and that private broadcasters were seeking to extend their FM licences beyond 2026. If the Swiss federal parliament rejected the licence extensions, the Swiss Administration might negotiate a bilateral agreement to give the Italian Administration the right to use some of its GE84 frequencies for a certain number of years.

3.26 With regard to DAB, the Administration of Italy undertook to release the two uncoordinated frequency blocks 7C and 7D as soon as the Adriatic-Ionian agreement had been signed. Despite significant efforts, final signature continued to be delayed because of two diverging views concerning frequency allotments.

3.27 The meeting had also issued a number of recommendations. In particular, it had requested the Administration of Italy to provide complete technical data by the end of 2025; to revise FM operations and establish and share a roadmap for migration from Band II to Band III; and to apply the relevant Board decisions and officially inform FM broadcasters that, in accordance with the Radio Regulations, uncoordinated stations had no right to protection. The Italian Administration might also wish to conduct its own interference measurements or participate in those taken by other administrations.

3.28 In Addendum 2 to Document RRB25-3/11, the Administration of Slovenia confirmed that there had been no improvement in the interference situation. It drew attention to numerous cases in Italian courts concerning assignments not recorded in the GE84 Plan, and called on the Italian Administration to officially inform Italian FM operators that none of the uncoordinated frequency assignments had the right to protection.

3.29 In Addendum 3 to Document RRB25-3/11, the Administration of Croatia reported no improvement in the interference situation, informing the Board that it had submitted 965 new Appendix **10** reports from June to September 2025.

3.30 **Mr Azzouz** thanked the Bureau for organizing the multilateral meeting and welcomed the valuable information in Addendum 1. He thanked the administrations for their efforts and welcomed the activities and bilateral meetings held since the previous multilateral meeting. The Board should request the Bureau to follow up and report on the implementation of the recommendations made. He hoped that, at its next meeting, the Board would learn of further progress in reducing or eliminating the harmful interference, including through the signing of the Adriatic-Ionian agreement.

3.31 **Ms Beaumier**, thanking the Bureau for convening the multilateral meeting, said that the Board should note the severe lack of progress made in addressing the cases of harmful interference to FM stations. The Administration of Slovenia had reported that not a single case had been resolved for 22 years, and the Administration of Croatia and others had been waiting for relevant technical data for eight years. While the Administration of France had been able to resolve certain issues, the assignment of Bonifacio 88.3 MHz remained unusable, and a new interference case (Porto Vecchio 106.4 MHz) had been observed. Moreover, the recommendations of the most recent multilateral meeting were identical to those of the previous such meeting. On the positive side, the Board should appreciate the offer of the Administration of Switzerland to give Italy the right to use some of its GE84 frequencies for a certain number of years, should FM licence extensions be rejected by the Swiss federal parliament. The Board should reiterate its previous conclusions, including those made after the 2024 multilateral meeting, and strongly urge the Administration of Italy to respect its commitment to provide technical data by the end of 2025; implement all the other recommendations of the multilateral meeting; take all necessary measures to eliminate harmful interference to the FM sound broadcasting stations of neighbouring administrations; and cease the operation of all uncoordinated stations. It should also urge all administrations concerned to continue their coordination efforts with a view to resolving the issues and instruct the Bureau to continue providing assistance to them.

3.32 **Ms Ghazi (Head TSD/BCD)**, responding to a question from **Mr Fianko**, said that she was not entirely sure whether the 30 per cent loss of listeners experienced by the public broadcaster in Switzerland was due to the availability of DAB receivers or to the change of programmes. **Mr Henri** added that, although programming changes might be a factor, people might be reluctant to purchase a DAB receiver in the early stages of the transition.

3.33 **Mr Fianko** said that the Board should welcome the allocation by the relevant Italian Ministry of a compensation fund to incentivize the voluntary switch-off of certain stations causing harmful interference to neighbouring countries and encourage it to follow through on that initiative. Given the experience of the public broadcaster in Switzerland during the transition to DAB, he highlighted the importance of consumer education and suggested that receivers might be made available under the incentives programme to prevent claims being made for loss of listeners or market share. He also endorsed the comments made by Ms Beaumier.

3.34 The **Chair** questioned whether the Board, which was tasked with resolving harmful interference issues, should enter into a discussion of public policy considerations.

3.35 **Mr Cheng** thanked the Bureau for its efforts to convene the very useful multilateral meeting and encouraged all parties to implement fully the agreed recommendations.

3.36 **Ms Ghazi (Head TSD/BCD)** said that the litigation process was problematic for the Italian Administration. As things stood, when operators were informed of changes they needed to make to resolve cases of international interference, they challenged the administrative ordinances in court in the knowledge that they were likely to win. The compensation fund was to be financed by annual savings, not government funds, and stood at EUR 20 million for 2024. The administrations at the multilateral meeting had considered that amount to be low, given the large number of stations and operators involved.

3.37 **Mr Azzouz** said that channels of communication should be established between Italian operators and the regulator to resolve issues related to changes in conditions to licences held for a long time in order to prevent recourse to the courts. A letter from ITU on the impact on neighbouring countries might help the regulator in the event of legal action.

3.38 **Ms Beaumier** said that, although the Italian Administration appeared to be trying its best at the working level, its efforts were not yielding meaningful progress and prompt action, which was what the Board had been seeking for several years. The Board might therefore wish to take further steps to ensure that proper attention was paid to the issue by the Italian Government by requesting the Director to intervene.

3.39 **Mr Vassiliev (Chief, TSD)** pointed out that the regional agreement on FM broadcasting was not recognized by the Italian Government. Any appeal to the Ministry to cease the harmful interference was unlikely to expedite resolution of the issue, given that administrative decisions were usually successfully challenged in court by the operators.

3.40 The **Director** said that precedent existed for himself and subsequently the Secretary-General, if required, to communicate with the authorities of an administration causing harmful interference, as a means of escalation. Such correspondence was not likely to assist the Italian regulator, as the court would rule in favour of the operators whose licences had been legally granted. However, it would serve to raise awareness of non-compliance at higher levels in the Permanent Mission to the United Nations in Geneva, as well as in the Ministry of Foreign Affairs. It was the Board's duty to inform the Government of Italy that binding legal obligations under the Radio Regulations had not been met for some time; otherwise, the Board's relevance might be questioned.

3.41 **Mr Fianko** agreed that a letter from the Director could add validity to the regulator's position and foster greater support for action. Noting that Italy was not a signatory to the GE84 Agreement, he said that the focus should be on non-compliance with the Radio Regulations. **Ms Manneppalli** agreed, suggesting that support from a higher level could help the Italian Administration in resolving the cases.

3.42 **Ms Beaumier** said that the purpose of a letter from ITU was not to assist the Italian regulator in court but to raise awareness among the Italian authorities of non-compliance with treaty obligations and facilitate the resolution of the long-standing harmful interference issues. She was unsure why the Italian Administration had not been able to provide the relevant technical data for many years. Moreover, as the courts did not automatically consider valid the interference measurements submitted by a foreign administration, the Administration of Italy should be encouraged to participate in a collaborative measurement campaign with interested administrations.

3.43 The **Chair** proposed that the Board should conclude on the matter as follows:

"The Board considered in detail § 4.1 of, and Addenda 1, 2 and 3 to Document RRB25-3/11, on harmful interference to broadcasting stations in the VHF/UHF bands between Italy and its neighbouring countries. The Board noted the following points:

- A multilateral coordination meeting organized and assisted by the Bureau had been held on 1 and 2 October 2025 in Switzerland between the Administrations of Croatia, France, Italy, Malta, Slovenia and Switzerland.
- There had been no improvement regarding FM interference in Band II since the 2024 multilateral coordination meeting, and a new interference case had been added to the French priority list.
- Bilateral discussions were ongoing or planned between some administrations to address those cases.
- The Administration of Italy had not respected its commitment to provide technical data on possible interfering stations to its neighbouring administrations.
- Operators requiring changes to the interfering FM stations had successfully challenged decisions by the Italian regulator in court, questioning the provenance of the interference measurements.
- The compensation scheme to incentivize operators causing interference to stations in neighbouring countries to voluntarily return station licences would be launched by the end of 2025, with initial funding of 20 million euros, but would likely require additional funding.
- No interference had been reported in Band III to DAB stations. However, the Administration of Italy was still using the uncoordinated frequency blocks 7C and 7D.
- The multilateral Adriatic-Ionian agreement on the VHF Band III had not yet been signed.

The Board thanked the administrations that had participated in the multilateral coordination meeting, the Administrations of Croatia and Slovenia for their report on the status of the situation and the Bureau for convening the meeting and providing assistance.

The Board continued to express profound disappointment at the almost total absence of progress towards resolving cases of harmful interference to FM sound broadcasting. The Board once again strongly urged the Administration of Italy to:

- fully commit to implementing all the recommendations resulting from the 2025 multilateral coordination meeting;
- expeditiously provide the complete technical data required by the neighbouring administrations to facilitate the process of mitigating interference cases;
- take all necessary measures to eliminate harmful interference to the FM sound broadcasting stations of its neighbouring administrations, focusing on the priority list updated at the 2025 multilateral coordination meeting;
- cease the operation of all uncoordinated DAB stations not contained in the GE06 Agreement;
- pursue its efforts to finalize the Adriatic-Ionian agreement, in order to encourage the transition to the DAB platform and alleviate congestion in the FM band;
- promptly implement the compensation procedure for operators voluntarily returning their licences and switching off their FM broadcasting stations causing interference;
- participate in a collaborative measurement campaign with the administrations concerned, to allow for endorsement of the interference measurements.

The Board again encouraged the Administration of Italy to accelerate the introduction of the compensation scheme relating to the voluntary switch-off of FM stations causing interference to its neighbours and to allocate more funds whenever possible, as the funds allocated might not be enough to solve all interference cases.

Furthermore, the Board urged all administrations to continue their coordination efforts in goodwill and to report on progress to the 101<sup>st</sup> Board meeting.

The Board also thanked the Bureau for its report and the support provided to the administrations concerned, and instructed the Bureau to:

- continue providing assistance to those administrations;
- write a letter to the Government of Italy calling for the prompt resolution of the matter;
- organize a multilateral coordination meeting between Italy and its neighbouring countries in June 2026;
- continue reporting on progress on the matter to future Board meetings.”

3.44 It was so **agreed**.

#### **Implementation of Nos. 9.38.1, 11.44.1, 11.47, 11.48, 11.49, 13.6 and Resolution 49 (Rev.WRC-23) of the Radio Regulations (§ 5 of Document RRB25-3/11)**

3.45 The Board **noted** § 5 of Document RRB25-3/11, on the implementation of Nos. **9.38.1, 11.44.1, 11.47, 11.48, 11.49, 13.6** and Resolution **49 (Rev.WRC-23)** of the Radio Regulations.

#### **Review of findings to frequency assignments to non-GSO FSS satellite systems under Resolution 85 (Rev.WRC-23) (§ 6 of Document RRB25-2/4)**

3.46 **Mr Vallet (Chief, SSD)** recalled that the Bureau no longer issued qualified favourable findings under Resolution **85 (Rev.WRC-23)** unless requested to do so by an administration that considered that the current version of the software did not properly model its system. It was, however, reporting on the updated status of CR/C modifications submitted under the rule of procedure on No. **9.27** in order to maintain the original

date of protection, as Table 6 showed. The examination of NSL-1 had been completed and would be published at the end of November; the date of protection would not be kept as the examination had concluded that the modification would create more interference.

3.47 **Mr Henri** suggested that the table might also include information on the earliest date of receipt of the CR/C modifications to be considered, which would give a clearer view on the backlog and work yet to be done.

3.48 Responding to requests for clarification from **Mr Henri** and **Mr Azzouz, Mr Vallet (Chief, SSD)** said that the backlog under Resolution **85 (Rev.WRC-23)** had caught up with the backlog in the examination of coordination requests. The Bureau was currently processing coordination requests from September 2024. He recalled that the modified coordination request (CR/C modification 2) for NSL-1 received by the Bureau in 2019 and published in 2021 had been found to contain both unfavourable and favourable assignments. The Bureau had since completed the examination of a further modified coordination request (CR/C modification 3) received from the Administration of Israel on 1 August 2023, meaning that the second phase of the processing of the filing had been completed and would be published in the Bureau's International Frequency Information Circular (BR IFIC) on 28 November 2025. The examination had shown that the Israeli Administration had requested to modify the orbital parameters to move from 19 to more than 300 satellites. As that would increase interference, the original date of protection could not be retained. Those assignments found to be in conformity with the Radio Regulations would therefore be published as CR/C modification 3 with a new date of protection of 1 August 2023 (date of receipt of the modified coordination request). The date of protection was determined by the Bureau in accordance with the Radio Regulations and Rules of Procedure. The usual four-month commenting process for administrations would apply.

3.49 The Board **noted** § 6 of Document RRB25-3/11, on the implementation of Resolution **85 (Rev.WRC-23)**. Noting that modifications of coordination requests accompanied by a request to not change the date of protection in accordance with the rule of procedure related to No. **9.27** of the Radio Regulations were currently processed according to the same processing queue as other coordination requests, the Board concluded that the report on the implementation of Resolution **85 (Rev.WRC-23)** could be discontinued in future Director's reports to the Board.

#### **Implementation of Resolution 35 (Rev.WRC-23) (§ 7 of Document RRB25-3/11)**

3.50 The Board **noted** § 7 of Document RRB25-3/11, on the implementation of Resolution **35 (Rev.WRC-23)**.

#### **Late submission information cases (§ 8 of Document RRB25-3/11)**

3.51 **Mr Vallet (Chief, SSD)** introduced § 8 of Document RRB25-3/11, which informed the Board of the reasons why the Bureau had, on an exceptional basis, decided to accept the late submission and due diligence notification for the B-SAT-2R satellite network from the Administration of Brazil, and the late resubmission of the THEO satellite system from the Administration of the United Kingdom.

3.52 **Mr Henri** said that he fully concurred with the Bureau's decisions. Referring to the B-SAT-2R satellite network, he observed that the Bureau had decided to accept the notices because of a misunderstanding about the fact that submissions were registered according to Geneva date and time, resulting in a few hours' delay from the time difference with Brazil. In the report, however, the Bureau had also noted that the satellite network was already operational, which should not, in itself, be sufficient justification to accept a late submission. Referring to late resubmission of the THEO satellite system, he recognized the difficulty for administrations sometimes to find the reasons for fatal errors identified by the Bureau's validation software. When advertising tools to operators or administrations, the Bureau should indicate that, to avoid missing the regulatory deadline, it would be preferable for administrations to provide their submissions to the Bureau including fatal errors, but with an accompanying letter explaining why they had been unable to rectify those errors. In his experience, the Bureau was always pleased to provide assistance in such cases.

3.53 The Board **noted** the decisions of the Bureau on the late submission of the notification and due diligence information for the B-SAT-2R satellite network and on the late resubmission of the THEO satellite system, as reported in § 8 of Document RRB25-3/11.

**Update concerning harmful interference to receivers in the RNSS (Addendum 4 to Document RRB25-3/11)**

3.54 **Mr Vallet (Chief, SSD)** introduced Addendum 4 to Document RRB25-3, which provided an updated report on harmful interference to receivers in the RNSS. Since the Board's previous meeting, the Bureau had made available on its main website a dedicated webpage on RNSS and had continued to support the efforts of the administrations concerned to convene bilateral or multilateral meetings. The Administrations of Lithuania and the Russian Federation had now agreed to meet, and dates would be coordinated after the Board's meeting. Since the beginning of 2025, the Bureau had received 24 reports of harmful interference affecting the RNSS and several requests for assistance. In view of the persistence of such cases, the Bureau recommended that the Board reiterate to the administrations concerned their obligation to cooperate urgently in the resolution of the cases, and urge administrations to prevent any type of transmission that could adversely affect RNSS receivers of other administrations.

3.55 **Ms Beaumier** said that it was troubling to learn that cases of harmful interference affecting the RNSS persisted given the severe risk to safety-of-life operations. She appreciated the Bureau's actions to support the efforts of the administrations concerned and hoped that the bilateral meeting between the Administrations of Lithuania and the Russian Federation would take place shortly, given the urgency of resolving the situation. She agreed that the Board should reiterate its previous decision, but in stronger terms.

3.56 **Mr Azzouz** said that he agreed with the Bureau's recommendations set out in Addendum 4. The Board's conclusion should be published on the new webpage.

3.57 **Ms Hasanova** thanked the Bureau for helping to convene meetings between the administrations concerned and expressed support for the Bureau's recommendations.

3.58 The **Chair** proposed that the Board should conclude on the matter as follows:

"The Board noted Addendum 4 to Document RRB25-3/11, on harmful interference to receivers in the RNSS.

The Board thanked the Bureau for its report, the publication of a dedicated Bureau webpage for informing the ITU membership and the general public about such harmful interference cases, and the support provided to the administrations concerned.

Concerning the global situation of interference to RNSS receivers, in view of the persistence of harmful interference cases, the Board reiterated to the administrations concerned their obligation to cooperate urgently in the resolution of the cases in compliance with the ITU Constitution and the Radio Regulations. The Board again urged administrations to prevent any type of transmission that could adversely affect the RNSS receivers of other administrations.

Concerning the specific case of RNSS receivers located in Estonia, Finland, Latvia and Lithuania and subject to interference from a source located on the territory of the Russian Federation, the Board instructed the Bureau to:

- again, urge the Administration of the Russian Federation to take all possible actions to immediately cease any source of harmful interference to safety services in the RNSS;
- continue providing assistance to the administrations concerned to resolve the cases of harmful interference and prevent their reoccurrence;
- continue assisting in the organization of bilateral or multilateral meetings between the Administration of the Russian Federation, on the one hand, and the Administrations of Estonia, Finland, Latvia and Lithuania, on the other;
- report on progress on the matter to future Board meetings."

3.59 It was so **agreed**.

## Harmful interference to satellite networks (Addendum 5 to Document RRB25-3/11)

3.60 **Mr Vallet (Chief, SSD)** introduced Addendum 5 to Document RRB25-3/11, which reported on the meetings that the Board had asked the Bureau to convene between the Administrations of the Russian Federation, France and Sweden and Luxembourg. No meeting had yet been held between the Administrations of the Russian Federation and Luxembourg. The Administration of the Russian Federation had sought further clarification of the scope of the meeting, since it had responded to the point raised by the Administration of Luxembourg regarding interference to BSS feeder links and such interference had ceased to be reported. The Bureau had been informed orally that the Administration of Luxembourg would reply in writing to the questions of the Administration of the Russian Federation.

3.61 The Administrations of the Russian Federation and France had met online, with the participation of the Bureau, on 23 October 2025. Some procedural aspects relating to acknowledgement of receipt of interference reports had been clarified. The Administration of the Russian Federation had also indicated that the interference to the satellites of the Administration of France was due to the operation of Russian military installations used to protect its civilian facilities; no harm to the satellite operations of the Administration of France had been intended. In response to a request for clarification from the Administration of the Russian Federation, the Administration of France had indicated that it had last submitted an interference report in March 2025 but would have to consult with the French satellite operator to confirm whether the interference persisted. The Administration of the Russian Federation had agreed to engage in a direct dialogue with the Administration of France and to endeavour to address any other interference cases that might arise.

3.62 The Administrations of the Russian Federation and Sweden had met online, with the participation of the Bureau, on 24 October 2025. The Administration of Sweden had confirmed that, although the interference had decreased over time, satellite transmissions in the 14 GHz range continued to be affected by intermittent harmful interference. It had also explained that no additional report had been submitted to the Bureau or the Board as the interference followed the same patterns as previously reported to the 99<sup>th</sup> Board meeting. The Administration of the Russian Federation had indicated that the harmful interference reports had been investigated and found to be caused by operations of its military installations for national defence purposes, and that there had been no intent to deliberately interfere with the satellite operations of the Administration of Sweden. It had also explained that, as those military installations operated in accordance with Article 48 of the ITU Constitution, details of the earth stations could not be shared with the Administration of Sweden. It had, however, emphasized its willingness to cooperate with that administration to minimize the impact on Swedish satellites, and requested more details about the most recent interference cases. Both administrations had agreed to exchange the details of focal points to expedite reporting and action. Those details had subsequently been shared by the administrations and the Bureau would monitor progress.

3.63 **Mr Azzouz** welcomed the collaborative spirit and efforts of the administrations to resolve the harmful interference, including the sharing of details of focal points. The Board should encourage the administrations concerned to cooperate in goodwill to solve the harmful interference cases and prevent their reoccurrence. It should also instruct the Bureau to continue to provide support to the administrations concerned and to report on progress to the Board's next meeting.

3.64 **Ms Beaumier** applauded the spirit of cooperation shown by all participants in the online meetings and the willingness of the administrations to engage in a constructive dialogue to solve the harmful interference issues. While the Administration of the Russian Federation had indicated that the activities of military installations operating in accordance with Article 48 of the Constitution were beyond the mandate of the Board, cases of harmful interference involving such installations were not. Recalling Article 45 and Nos. 202 and 203 of the ITU Constitution, she said that Article 48 did not give administrations a blank cheque to cause harmful interference, deliberately or otherwise. While the Board was not able to pressure an administration to provide details on its military installations operating under Article 48, it could request that administration to cease the transmissions causing harmful interference, especially when they affected third parties. It could also request that administration to carry out investigations and report on their status and actions taken to address the harmful interference.

3.65 The Administration of the Russian Federation had not provided a report to the present meeting on the status of its investigation and actions carried out since the cases had been reported, as it had been urged

to do by the Board at the previous meeting. However, as it appeared to be collaborating with the Administrations of France and Sweden, the Board should, at the current meeting, focus on urging the Administration of the Russian Federation to take the necessary steps to eliminate the harmful interference to the frequency assignments of the Administration of Sweden in the 14 GHz band, and on encouraging all the administrations concerned to continue to cooperate in goodwill to solve the harmful interference cases.

3.66 **Mr Henri** said that because the operation of military radio installations under Article 48 of the ITU Constitution was not preventing compliance with the regulatory provisions, in particular the recording of earth stations in the MIFR.

3.67 **Mr Vallet (Chief, SSD)**, recalling the Board's decision at its 99<sup>th</sup> meeting to accede to the request to publish relevant information about the harmful interference cases under *resolves to instruct the Radio Regulations Board 2 of Resolution 119 (Rev. Bucharest 2022)* of the Plenipotentiary Conference, said that the Bureau had developed a draft webpage for the Board's consideration.

3.68 **Mr Henri** said that, following the Bureau's update and the fact that discussions of the highly sensitive issue were ongoing between the administrations concerned, it would be premature for the Board to publish the webpage at the current meeting. The decision should be kept in abeyance pending further developments. **Ms Beaumier** agreed.

3.69 The **Chair** said that he also considered that publication of the webpage should be kept in abeyance, as further progress might be made in the discussions. **Ms Manneppalli** shared that view, adding that the Board should adopt a "wait and watch" approach.

3.70 **Mr Vallet (Chief, SSD)** pointed out that varying levels of progress had been made in the cases of harmful interference involving the Administrations of the Russian Federation, France, Luxembourg and Sweden. He summarized the most recent developments, noting that the Administration of the Russian Federation had expressed a willingness to cooperate. As the Administration of Sweden had confirmed that the harmful interference persisted, but the Administration of France had not, the actions expected from the Administration of the Russian Federation with respect to those administrations would therefore be different. He also asked whether the Board, should it decide to publish the webpage, would wish to include information on harmful interference to BSS feeder links in the 18 GHz range, as that issue appeared to have been resolved following the Board's actions.

3.71 **Mr Henri** agreed that simply reproducing the Board's decisions on the website could be confusing and misleading for the reader, who might not have a full understanding of the cases. The Bureau might wish to prepare a foreword or summary of the issue to assist the reader.

3.72 The **Chair** said that the Bureau should report to the next meeting, and the Board should evaluate the progress made before making a decision. He proposed that the Board should conclude on the matter as follows:

"The Board noted Addendum 5 to Document RRB25-3/11, containing reports on the meetings between delegations of the Administrations of France, the Russian Federation and Sweden concerning harmful interference affecting satellite networks notified by the Administration of France, on its own behalf or acting as the notifying administration of the intergovernmental organization Eutelsat, and by the Administration of Sweden.

The Board noted that:

- The Bureau had organized meetings in October 2025 between the Administrations of France and the Russian Federation and between the Administrations of Sweden and the Russian Federation.
- Interference to the satellites of the Administrations of France and Sweden originated from the operation of Russian military installations.
- The earth stations causing the interference were not recorded in the Master International Frequency Register and details could not be shared as they were military radio installations.

- However, the Administration of the Russian Federation had indicated its willingness to cooperate with the administrations concerned in order to minimize the impact of the operation of military installations on French and Swedish satellites.
- Harmful interference continued to affect transmissions on Swedish satellites in the 14 GHz band.
- The Administrations of France and Luxembourg were assessing whether harmful interference originating from the territory of the Russian Federation continued to affect their satellite networks.

Taking into account Article 45 and No. 203 of the ITU Constitution, the Board expressed the view that the consideration of harmful interference cases involving military radio installations operated under Article 48 of the Constitution was within its mandate. Consequently, the Board again strongly urged the Administration of the Russian Federation to immediately cease any transmissions causing harmful interference to frequency assignments of other administrations. The Board also encouraged the administrations concerned to continue to cooperate in goodwill to solve harmful interference cases and prevent their reoccurrence.

As instructed by the Board during its 99<sup>th</sup> meeting, the Bureau had developed a draft webpage related to the publication of information about the harmful interference cases under *resolves to instruct the Radio Regulations Board 2 of Resolution 119 (Rev. Bucharest, 2022)* of the Plenipotentiary Conference. In light of the recent developments and ongoing discussions between the administrations concerned, the Board decided to keep publication of the webpage in abeyance.

Finally, the Board instructed the Bureau to:

- continue to provide support to the administrations concerned;
- report on progress to the 101<sup>st</sup> Board meeting.”

3.73 It was so **agreed**.

**Additional information on cases of harmful interference to receivers in the RNSS (Addendum 6 to Document RRB25-3/11)**

3.74 **Mr Vallet (Chief, SSD)** introduced Addendum 6 to Document RRB25-3/11, in which the Administration of Israel provided an update, as requested by the Board at its 99<sup>th</sup> meeting, on actions taken to cease harmful interference that adversely impacted safety services. Following internal consultations, the Israeli Defense Forces had committed to an operational safeguard to minimize such interference, as detailed in the document, and the administration had subsequently not received any reports of harmful interference to the RNSS. The Israeli Administration also expressed its commitment to cooperating fully with ITU and neighbouring administrations to ensure adherence to the international regulatory framework. He noted that the Ministry of Communications was very concerned about the issue, having received numerous complaints from Israeli citizens.

3.75 Following a question from **Ms Manneppalli**, he added that, since the safeguard had been put in place, the Bureau had also not received any further complaints from the Administrations of Egypt or Jordan.

3.76 **Ms Manneppalli** thanked the Administration of Israel for its consistent efforts to minimize interference to the RNSS. She was pleased that the Board's decisions and the Bureau's interventions had led to some improvements.

3.77 **Ms Hasanova** thanked the Israeli Administration for its actions and report, noting with satisfaction that the Bureau had not received any further interference reports from the administrations concerned.

3.78 The **Chair** proposed that the Board conclude on the matter as follows:

“The Board noted Addendum 6 to Document RRB25-3/11, containing a submission from the Administration of Israel providing additional information on cases of harmful interference to receivers in the RNSS. The Board noted the following points:

- Following its meetings with the Administrations of Jordan and Egypt in July 2025, the Administration of Israel had committed to implement operational safeguards to ensure that transmissions were strictly limited to situations where there was an imminent and verifiable threat to human life or critical national infrastructure, and in such cases, did not exceed a duration of 15 minutes.

- Since then, no complaint regarding cases of interference to the RNSS had been reported.

The Board thanked the Administration of Israel for its report on the status of the situation and the work done. It noted that the positive attitude demonstrated by the Administration of Israel and the cooperation of the Administrations of Jordan and Egypt had resulted in the resolution of the harmful interference cases.”

3.79 It was so **agreed**.

3.80 Having considered in detail the Report by the Director of the Radiocommunication Bureau, as contained in Document RRB25-3/11, and its Addenda 1 to 6, the Board **thanked** the Bureau for the extensive and detailed information provided.

## 4 Rules of Procedure

### 4.1 List of proposed Rules of Procedure (Documents [RRB25-3/1](#) and [RRB24-1/1\(Rev.5\)](#))

4.1.1 **Ms Hasanova**, Chair of the Working Group on the Rules of Procedure, reported that the working group, which had met three times during the 100<sup>th</sup> Board meeting, had reviewed and updated the list of proposed rules of procedure set out in Document RRB25-3/1, adding, at the behest of the Bureau, two new rules, one on coordination requirements for passive sensors on board a geostationary satellite network, the other on the implementation of Resolution **679 (WRC-23)**, on the use of the frequency bands 18.1-18.6 GHz, 18.8-20.2 GHz and 27.5-30 GHz by the inter-satellite service.

4.1.2 The working group had also considered the comments received from the Administration of the Russian Federation in response to Circular Letter CCRR/79, regarding the rules of procedure on Nos. **5.434** and **5.435**, and on Nos. **5.429D** and **5.429G**. It had not accepted the administration's proposed modifications, as they involved additions to the minutes of WRC-23 Plenary meetings, which Member States were not authorized to change. Consequently, the working group had approved the rules of procedure as circulated to administrations in Circular Letter CCRR/79.

4.1.3 Following up on the comments made by the Administration of Canada in Document RRB25-2/5, the working group had reviewed the Bureau's proposed modifications to the rules of procedure related to Section B6 of Part B of the rules and had agreed to include the mobile service as a protected service in the frequency bands 470-960 MHz and 3 400-3 800 MHz. It had also agreed to replace "LMS (IMT)" with LMS in No. **5.307A**, so as to align the rules with the provisions of the Radio Regulations. In addition, on the proposal of Board members, it had agreed to replace the term "IMT Advanced" in § 3.7 with the generic term "IMT", to take account of developments in IMT technologies. The working group recommended that the Bureau be instructed to circulate the draft rules of procedure related to Section B6 to administrations for consultation.

4.1.4 With reference to the addition of new rules of procedure on No. **13.6**, the working group, having discussed the Bureau's report on the recent deliberations of Working Party 4A and the contributions received from the Administrations of the United States and Australia (see §§ 4.4 and 4.5 below), had agreed to defer consideration of the matter to its 102<sup>nd</sup> meeting and recommended that the Bureau be instructed to maintain its current practice in the meantime.

4.1.5 The working group had also approved the 2025 edition of the Rules of Procedure prepared by the Bureau since the Board's previous meeting. The working group recommended that the 2025 edition be approved in plenary and the Bureau instructed to publish it.

4.1.6 Lastly, the working group had continued its review aimed at identifying rules of procedure that might be candidates for transfer to the Radio Regulations. Proposed amendments to the relevant provisions would be considered at the next working group meeting.

4.1.7 **Mr Henri** suggested that the working group should consider resuming its discussion of the application of Resolution **1 (Rev.WRC-97)** in the processing of frequency assignments.

4.1.8 **Mr Vallet (Chief, SSD)** explained the Bureau's current practice with regard to No. **13.6** and orbital tolerances for space stations not subject to Resolution **8 (WRC-23)**. The Bureau used the less stringent of the envelopes set out in the resolution and the values that had applied before WRC-23, i.e. a 10 per cent maximum distance between the notified and actual orbital parameters, to calculate the parameters. If the actual parameters were outside the envelope, the Bureau wrote to the administration concerned and informed it that there appeared to be a considerable difference between the notified and actual parameters and proposed that the administration align the former with the latter. If the satellite network was not subject to coordination, the administration could simply inform the Bureau of the notified parameters it agreed to change. If the satellite system was subject to coordination, the administration would have to submit a modified notification.

4.1.9 The **Chair** proposed that the Board should conclude as follows on the working group's deliberations: "Following a meeting of the Working Group on the Rules of Procedure, under the leadership of Ms S. HASANOVA, the Board:

- revised and approved the list of proposed rules of procedure contained in Document RRB25-3/1, taking into account proposals by the Bureau for the revision of certain rules of procedure and proposals for new rules of procedure;
- instructed the Bureau to publish the revised version of the document on the website and to prepare and circulate those draft rules of procedure well in advance of the 101<sup>st</sup> Board meeting, to allow administrations enough time to comment.

The working group also continued its review of rules of procedure and identified additional rules that might be candidates for transfer to the Radio Regulations. Proposed amendments to the relevant provisions would be considered at its next meeting. The Board instructed the Bureau to proceed with the publication of the 2025 edition of the Rules of Procedure."

4.1.10 It was so **agreed**.

## 4.2 Draft rules of procedure (Document [CCRR/79](#))

4.2.1 The Board, having considered the comment from one administration in Document RRB25-3/14, reviewed the draft new and modified rules of procedure set out in Circular Letter CCRR/79.

### **MOD rules concerning the receivability of forms of notice generally applicable to all notified assignments submitted to the Radiocommunication Bureau in application of the Radio Regulatory Procedures**

4.2.2 **Approved**, with effective date of application immediately after approval.

### **MOD rules concerning Article 4**

4.2.3 **Approved**.

### **ADD rules concerning Article 5**

4.2.4 **Approved**.

### **MOD rules concerning the extension of the regulatory time-limit for bringing into use satellite assignments**

4.2.5 **Approved**.

### **MOD rules concerning Article 21**

4.2.6 **Approved**.

### **ADD rules concerning Article 4 of APPENDIX 30**

4.2.7 **Approved**.

## MOD title of and ADD rule concerning Article 4 of Appendix 30A

4.2.8 **Approved.**

## MOD titles of Articles 6 and 7 of Appendix 30B and ADD rule concerning Article 6 of Appendix 30B

4.2.9 **Approved.**

## ADD rules concerning Resolution 559 (WRC-19)

4.2.10 **Approved.**

4.2.11 The **Chair** proposed that the Board should conclude as follows:

“The Board discussed in detail the draft rules of procedure circulated to administrations in Circular Letter CCRR/79, along with the comments received from the Administration of the Russian Federation as contained in Document RRB25-3/14.

The comments of the Administration of the Russian Federation were not accepted, since the administration had suggested modifications to the minutes of WRC-23 plenary meetings. The decisions of plenary meetings were to be kept as they were, without any change. In addition, the concern of the Russian Federation was related to the term ‘neighbouring country’ and had been covered by the addition of a footnote to item 2.2 of Part B6 of the Rules of Procedure that had been approved at the 99<sup>th</sup> Board meeting.

The Board approved the rules of procedure as published in CCRR/79 without further modifications, as contained in the annexes to this summary of decisions.”

4.2.12 It was so **agreed**.

## 4.3 Comments from administrations (Document [RRB25-3/14](#))

4.3.1 The **Chair** noted that Document RRB25-3/14 had been considered in conjunction with Circular Letter CCRR/79 under § 4.2 above.

## 4.4 Submission by the Administration of the United States regarding the timing of Working Party 4A review of the draft rule of procedure on No. 13.6 (Document [RRB25-3/12](#))

4.4.1 The **Chair** proposed that Document RRB25-3/12 be considered in conjunction with Document RRB25-3/18, under sub-item 4.5.

4.4.2 It was so **agreed**.

## 4.5 Submission by the Administration of Australia regarding the consideration of the draft rules of procedure on No. 13.6 (Document [RRB25-3/18](#))

4.5.1 **Mr Vallet (Chief, SSD)**, introducing Documents RRB25-3/12 and RRB25-3/18, recalled that, at its 99<sup>th</sup> meeting, the Board had decided to defer its consideration of the draft rule of procedure on No. **13.6**, relating to orbital tolerances for non-GSO systems not subject to Resolution **8 (WRC-23)**, to the 100<sup>th</sup> Board meeting and instructed the Bureau to bring the content of the draft rule of procedure to the attention of Working Party 4A. In document RRB25-3/12, the Administration of the United States pointed out that any output from Working Party 4A would not be available in time for consideration at the current meeting, as the working party had concluded its deliberations on 6 November, after the deadline for submissions. The administration therefore suggested that, in order to ensure that the Board benefited from relevant technical input, consideration of the draft rule of procedure should be further deferred to the 101<sup>st</sup> meeting and that the working party be given specific instructions on the scope of its review.

4.5.2 In Document RRB25-3/18, the Administration of Australia made the same request, citing similar grounds.

4.5.3 Moreover, in a note to the Director contained in Document 4A/TEMP/252, Working Party 4A had confirmed that it had been unable to discuss the draft rule of procedure in detail but that it planned to provide input in due course.

4.5.4 Given that the next meeting of Working Party 4A was scheduled to take place only after the 101<sup>st</sup> Board meeting, he proposed that the Board defer consideration of the draft rule of procedure on No. **13.6** to its 102<sup>nd</sup> meeting.

4.5.5 **Ms Beaumier, Ms Hasanova and Mr Henri** considered that it would be better to wait for input from Working Party 4A rather than attempt to reach a conclusion on the draft rule of procedure at the current meeting; they therefore agreed to defer the discussion to a later meeting.

4.5.6 **Mr Vallet (Chief, SSD)** said that, pending approval of the rule of procedure, the Bureau could continue to apply the current rules of procedure to process the bringing into use of a large number of non-GSO systems not subject to coordination, in order to avoid the accumulation of a backlog, but noted that those rules had been challenged. It could also stop processing such systems.

4.5.7 **Mr Henri** considered that the Bureau should continue processing such systems, even though that might mean that the Board would be called on to consider cases in which the contested rules of procedure had been applied.

4.5.8 **Mr Azzouz**, noting that the output of Working Party 4A would not be available for over six months, agreed that the Bureau should continue to process relevant systems in accordance with its current practice.

4.5.9 **Ms Beaumier** agreed that deferral of consideration of the draft rule of procedure should not lead to a stop in processing.

4.5.10 The **Chair** proposed that the Board should conclude as follows on the matter:

“The Board considered document RRB25-3/12 from the Administration of the United States regarding the timing of the Working Party 4A review of the draft rule of procedure on No. **13.6** and document RRB25-3/18 from the Administration of Australia regarding the consideration of the draft rules of procedure on No. **13.6**.

In view of the comments made by the Administrations of the United States and Australia, and of the information provided by Working Party 4A, the Board decided to defer its consideration of the draft rule of procedure on No. **13.6** to the 102<sup>nd</sup> Board meeting.

In the meantime, the Board instructed the Bureau to continue its current practice.”

4.5.11 It was so **agreed**.

## 5 Request for the cancellation of the frequency assignments to satellite networks under No. 13.6 of the Radio Regulations

### 5.1 Request for a decision by the Radio Regulations Board to cancel frequency assignments to the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks at 113°W under No. 13.6 of the Radio Regulations (Document [RRB25-3/17](#))

5.1.1 **Mr Ciccorossi (Head, SSD/SSS)**, introducing Document RRB25-3/17, said that the Administration of Mexico had informed the Bureau in June 2024 that it had suspended the frequency assignments to the SATMEX 7 satellite at 113°W on 25 March 2024. After having performed a number of routine checks, the Bureau had informed the Administration of Mexico in November 2024 that frequency assignments were also recorded at 113°W for the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks but that it had found no evidence that a satellite existed at that position. It had requested the administration to provide evidence that the satellite networks in question continued to operate and to identify the satellite in operation; reminders were sent in March and April 2025. In the absence of any response from the Administration of Mexico, the Bureau had informed the administration in June 2025 that it would ask the Board to cancel the frequency assignments to both satellite networks in the MIFR, in line with No. **13.6** of the Radio Regulations.

5.1.2 In the absence of any evidence to show that the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks continued to operate, **Mr Azzouz** and **Mr Talib** agreed with the Bureau's proposal to cancel the frequency assignments to those networks.

5.1.3 The **Chair** proposed that the Board should conclude on the matter as follows:

"The Board considered the request made by the Bureau in Document RRB25-3/17 for a decision on the cancellation of the frequency assignments to the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks under No. 13.6 of the Radio Regulations. The Board considered that the Bureau had acted in accordance with No. 13.6 in that it had requested the Administration of Mexico to provide evidence that the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks remained operational and to identify the actual satellite currently in operation, followed by two reminders, but had received no response.

Consequently, the Board instructed the Bureau to cancel the frequency assignments to the SOLIDARIDAD 2M and SOLIDARIDAD 2MA satellite networks in the Master International Frequency Register."

5.1.4 It was so **agreed**.

## 6 Requests to extend the regulatory time-limit to bring into use/bring back into use the frequency assignments to satellite networks/systems

### 6.1 Submission by the Administration of the United Kingdom of Great Britain and Northern Ireland requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the GANTS-2 and GANTS-3 satellite networks (Documents [RRB25-3/9](#) and [RRB25-3/30](#))

6.1.1 **Mr Loo (Head, SSD/CSS)** introduced Document RRB25-3/9, in which the Administration of the United Kingdom requested an extension of the regulatory time-limit to bring into use the frequency assignments to the GANTS-2 and GANTS-3 geostationary satellite networks on the grounds of co-passenger delay and *force majeure*. According to the submission, lease rights to the SIGMA-SAT-1 satellite had been procured for a planned launch in late 2022, ahead of the regulatory time-limit of 26 July 2025. However, for reasons not explained in the document, the planned launch vehicle had become unavailable; the operator had found an alternative – the EPIC CHIMERA-GEO-1 orbit transfer vehicle (EPIC OTV) – for launch on-board a Falcon 9 rideshare mission on 4 April 2024. Owing to a co-passenger delay, the rideshare mission had faced significant delays, ultimately launching on 26 February 2025.

6.1.2 Subsequently, the EPIC OTV had suffered a *force majeure* event: a radio-frequency communication failure had prevented it from performing the trajectory correction manoeuvre required for lunar swing-by. As a result, the EPIC OTV was now heading into deep space – the SIGMA-SAT-1 satellite still in its dispenser – some 3.5 million km from Earth. The administration therefore requested an extension of the regulatory time-limit for the GANTS-2 and GANTS-3 satellite networks until 31 December 2027 and 30 June 2028, respectively. It detailed the timeline of events, explained how it believed the situation met the four *force majeure* conditions, outlined the ongoing process of procuring a replacement satellite and provided various supporting documents in the annexes to Document RRB25-3/9, including the lease and launch services agreements. In Document RRB25-3/30, the administration gave an update on the procurement of two replacement satellites, providing copies of communications and a milestone chart.

6.1.3 **Ms Manneppalli** said it appeared that, despite the co-passenger delay causing the postponement of the Falcon 9 mission launch, the GANTS-2 and GANTS-3 satellite networks would have reached their orbital positions within the regulatory time-limit had it not been for the subsequent *force majeure* event. The administration had explained how it considered the communication failure to have met the four *force majeure* conditions. It seemed, however, that the administration had not immediately made alternative arrangements following the *force majeure* event; since the Ka and Ku bands were common, other in-orbit satellites might have been available to bring those filings into use. While the situation seemed to fulfil the

four *force majeure* conditions, she found it difficult to determine the length of extension required, since the projected milestones and timelines were based on a contract for the procurement of two replacement satellites that was still being negotiated. Further information would therefore be needed.

6.1.4 **Mr Cheng** said that, in his view, there was insufficient information to demonstrate that the gap-filler satellite launched in February 2025 would have reached the 45°W orbital position before the regulatory time-limit. Such information was needed to be able to determine whether the case met the *force majeure* threshold.

6.1.5 **Ms Beaumier** said that, at first glance, the four *force majeure* conditions might have seemed to have been met; however, the decision by the administration and the operator to use a new, unproven vehicle to carry a small gap-filler satellite had been inherently high risk. Technical problems had therefore been foreseeable and not inevitable. No information had been provided to explain why the administration had opted for that solution over all the other options at its disposal. The high-risk strategy was compounded by the use of what appeared to be Epic Aerospace's first OTV designed for high-energy transfers; while it was stated that no anomalies with the transfer vehicle had been found, there was no supporting evidence to that effect. Moreover, unlike typical geostationary satellites with built-in redundancy, gap-fillers were small satellites which usually lacked redundancy features. The inevitable outcome of those decisions, which had been within the administration's control, could not therefore be considered a *force majeure* event.

6.1.6 She found it difficult to understand why the administration had apparently planned to use a gap-filler satellite from the outset. The more usual approach would have been to initiate satellite manufacture and resort to a gap-filler only in the event of project delays to meet the regulatory time-limit. In the current case, the sequence of events had been reversed: a contract had been signed in 2022 to build and launch the gap-filler satellite, using an unproven solution to launch it into geostationary orbit; discussions on building a permanent satellite had begun only in early 2025 and the attendant contract had yet to be signed. No rationale for that approach had been provided. It was also unclear how long the SIGMA-SAT-1 satellite would have spent at the 167°W orbital location, after operating at 45°W for the required 90 days, raising concerns of spectrum reservation. Overall, more clarification was needed to explain the action that had been taken and justify the extensions requested. As things stood, she would not be inclined to support the granting of an extension.

6.1.7 **Mr Henri** concurred with **Ms Beaumier**'s concerns and said that he had doubts about qualifying the case as one of *force majeure*. The administration had taken a risky approach by using a small type of cube satellite that inherently lacked the redundancy of a more stable satellite. The aim appeared to have been to bring into use the frequency assignments within the regulatory time-limit with a view to immediately suspending them after deploying the satellite and maintaining it at the notified orbital position for ninety days. A long-term plan for the use of those assignments seemed to have been lacking before the gap-filler failed. Based on the information provided, it remained unclear what type of replacement satellites were being procured, i.e., small satellites, fully operating satellites or gap-filler satellites. More information about the nature of those satellites would have therefore been welcome, as would information on the current status of the contract negotiations and a more detailed rationale of the length of extension requested. At that stage, he was not in a position to accede to the request.

6.1.8 **Mr Azzouz** said that he was of a similar view, noting that responsibility for the decision to use a gap-filler satellite, which lacked a powerful propulsion system, rested with the administration and the operator. The submission largely concerned gap-filler satellites; information was absent on the long-term satellite and on the justification for the long extensions requested. The Board could not grant an extension at the current meeting.

6.1.9 **Ms Beaumier** said that, on further reflection, it was clear that the four *force majeure* conditions had not been met: the inherent risk of failure associated with using an untested OTV that was also required to perform a special corrective manoeuvre had been foreseeable and avoidable. The decision to take such an approach had been entirely within the administration's control. Moreover, she found the sequence of events troubling. Since the administration had addressed all the information requirements, as agreed at the 13<sup>th</sup> Plenary Meeting of WRC-23 (see § 13.4 of Document WRC23/528), she was not in favour of the Board seeking more information. If the administration decided to clarify events at a future meeting, the Board could re-examine the case.

6.1.10 The **Chair** proposed that the Board conclude on the matter as follows:

“The Board considered in detail the submission from the Administration of the United Kingdom of Great Britain and Northern Ireland requesting an extension of the regulatory time-limits for bringing into use the frequency assignments to the GANTS-2 and GANTS-3 satellite networks, as presented in Documents RRB25-3/9 and RRB25-3/30.

The Board noted the following points:

- The Administration of the United Kingdom had planned to launch the SIGMA-SAT-1 satellite in the 45°W orbital position and then to relocate it after 90 days to the 167°W orbital position. The satellite was a CubeSat intended to be used solely for the purpose of meeting the regulatory time-limit of 26 July 2025 for bringing into use the frequency assignments to the GANTS-2 (45°W) and GANTS-3 (167°W) satellite networks.
- The satellite operator had not initiated discussions for the development of long-term satellites until the first quarter of 2025, three years after a contract had been signed to build and launch a gap-filler satellite, and there was no description of the satellite project itself, suggesting the intent was speculative. The project had experienced co-passenger delays, but those delays had not impacted the operator’s ability to meet the regulatory time-limit.
- The SIGMA-SAT-1 satellite was successfully launched on 26 February 2025, but the orbit transfer vehicle EPIC OTV (Chimera-Geo-1) was unable to execute the correction manoeuvre to direct the satellite towards the geostationary orbit due to radio-frequency communication issues.
- While no anomalies with the transfer vehicle had been identified prior to the launch, it was a new low-cost vehicle that had never been used in space.
- The decision to use an unproven vehicle to launch a satellite came with a higher risk that it would not complete its mission that was known and accepted by the satellite operator, and that could not be considered unforeseeable, inevitable or beyond the operator’s control.

Consequently, the Board concluded that the situation did not qualify as a case of *force majeure*. The Board therefore decided that it was not in a position to accede to the request from the Administration of the United Kingdom to extend the regulatory time-limits for bringing into use the frequency assignments to the GANTS-2 and GANTS-3 satellite networks.”

6.1.11 It was so **agreed**.

## 6.2 Submission by the Administration of Indonesia requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the NUSANTARA-NS1-A (113°E) satellite network (Document [RRB25-3/15](#))

6.2.1 **Mr Ciccorossi (Head, SSD/SSS)** introduced Document RRB25-3/15, in which the Administration of Indonesia requested a further extension of the regulatory time-limit to bring into use the frequency assignments to the NUSANTARA-NS1-A (113°E) satellite network, to 28 February 2026. According to the administration’s summary of events since the Board’s 98<sup>th</sup> meeting, the SNL N5 satellite, which would be used to bring the frequency assignments into use, had completed its on-ground delivery from Boeing on 31 July 2025, approximately six weeks after the initial target date of 15 June 2025, owing to a hardware failure that had occurred during the spacecraft thermal vacuum testing. The satellite had subsequently been successfully launched on 11 September 2025, the launch window of 1 June to 31 August 2025 having been changed to 8 to 14 September 2025 following the prioritization of a United States government programme. The satellite was expected to arrive at its orbital position at 113°E in approximately six months. For the Administration of Indonesia, the entire sequence of events was beyond the control of both the administration and the network operator; the request therefore qualified as a case of *force majeure*. The annexes to the document contained substantiating communications from the satellite manufacturer (Boeing) and the launch operator (SpaceX).

6.2.2 Replying to comments made by **Ms Mannepalli** and **Ms Beaumier**, he added that six months was a typical orbit-raising period for this satellite. In Annex 5 to Document RRB25-3/15, Boeing confirmed that the satellite was forecast to reach its orbital position at 113°E by 28 February 2026, i.e. the end of the extension requested.

6.2.3 **Ms Mannepalli** considered that the case continued to meet the conditions for *force majeure*, owing to the circumstances of the delayed delivery and launch window, and said that she agreed to grant the additional extension.

6.2.4 **Ms Beaumier** said that, as had been the case with its previous submissions, the Administration of Indonesia did not demonstrate in Document RRB25-3/15 how the four conditions of *force majeure* had been met. For example, the administration had not demonstrated that the satellite would have been ready to begin using the frequency assignments before the end of December had it not been for the hardware failure. It had not stated when the failure had occurred, what the status of the satellite was at that time and whether there was any connection between the hardware failure and the change in launch window. If the Board was going to be serious about asking administrations to demonstrate clearly and explicitly how they satisfied each of the four conditions of *force majeure*, the Administration of Indonesia should be asked to do so, even for an extension of only two months.

6.2.5 **Mr Azzouz** commended the efforts of the Administration of Indonesia to maintain the satellite network filing. A satellite had been launched and was currently in the orbit-raising process. While the submission might not have provided all the necessary details about the difficulties encountered before delivery to the launch site, the case was clearly one of *force majeure*. Moreover, the extension requested was for a period of under three months as of the end of the current meeting. He therefore agreed to the request for an extension to 28 February 2026.

6.2.6 **Ms Hasanova** said that, while she understood the concerns expressed by Ms Beaumier, a satellite had been launched and the frequency assignments were scheduled to be brought into use before the next Board meeting. Moreover, the new request was for an extension of only two months beyond the original extension granted by the Board at its 98<sup>th</sup> meeting. She therefore had no difficulty in granting the request.

6.2.7 **Mr Cheng** noted that the Board had concluded at its 98<sup>th</sup> meeting that the case was one of *force majeure* and that the circumstances remained similar. He was willing to accede to the request for an extension to 28 February 2026, bearing in mind that the satellite had already been launched.

6.2.8 **Mr Talib** also expressed understanding for Ms Beaumier's concerns but considered that the situation remained one of *force majeure*. Given that the request came from a developing country and was for an extension of two months only, he was of the view that the extension should be granted.

6.2.9 **Mr Henri**, noting that the case was not the first concerning a launch postponement caused by the prioritization of a United States government programme to come before the Board, an element that operators knew, said that the Board was right to formally request that administrations provide a complete explanation of how their requests complied with the conditions for *force majeure*. The Board should note in its conclusion that the Administration of Indonesia had failed to do so. Each case before the Board had to be reviewed on its own merit and could not be related to a previous decision by the Board on the case. Despite some shortcomings in the information submitted by Administration of Indonesia, he was, however, in favour of granting the extension.

6.2.10 **Mr Nurshabekov** said that the reasons for the delay had been documented and were well founded. He therefore considered that the Board should grant the two-month extension requested, especially since a satellite was already on its way to its position and since the case concerned a developing country.

6.2.11 **Mr Di Crescenzo** said that he understood Ms Beaumier's concerns but believed that the Board should grant the extension.

6.2.12 **Ms Beaumier** said that she had no objection to granting the extension but wanted to stress three points: the request did not concern a continuation of the previous *force majeure* case but dealt with a completely separate issue that had to be assessed independently of the Board's decision at its 98<sup>th</sup> meeting; the Board's conclusion should note that the submission had not addressed each of the conditions for *force*

*majeure* specifically; and the Board's conclusion should not be based on the fact that a satellite had already been launched. Administrations and operators should not be led to believe that their requests were more likely to be granted if a satellite had already been launched or if the Board had made an earlier decision to grant an extension.

6.2.13 The **Chair** proposed that the Board should conclude as follows on the matter:

"The Board considered in detail the request of the Administration of Indonesia for an extension of the regulatory time-limit to bring into use the frequency assignments to the NUSANTARA-NS1-A (113°E) satellite network as presented in Document RRB25-3/15.

The Board noted the following points:

- The satellite had been delivered by the manufacturer approximately six weeks late owing to a hardware failure.
- A more precise launch window had been set on 2 May 2025 for the week of 24-30 August 2025, at the end of the previous launch window.
- The satellite had been successfully launched on 11 September 2025 following launch delays by the launch service provider.
- The satellite's ongoing orbit-raising process toward the assigned orbital location at 113°E was expected to be completed by the end of February 2026, based on the information provided by the satellite manufacturer.

While the Administration of Indonesia had again not addressed how the four conditions of *force majeure* were met, the Board concluded that sufficient information and evidence had been provided to conclude that the situation qualified as a case of *force majeure*. The Board therefore decided to extend the regulatory time-limit for bringing into use the frequency assignments to the NUSANTARA-NS1-A (113°E) satellite network to 28 February 2026."

6.2.14 It was so **agreed**.

### 6.3 Submission by the Administration of India requesting an extension of the regulatory time-limit to bring back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network (Documents [RRB25-3/19](#) and [RRB25-3/DELAYED/7](#))

6.3.1 **Mr Wang (Head, SSD/SPS)** introduced Document RRB25-3/19, in which the Administration of India requested an extension of the regulatory time-limit for bringing back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network, from 3 to 30 November 2025. In the document, the administration explained the importance of the project and why it planned to use the FSS KUP band under Appendix 30B. The CMS-03 satellite that would serve to implement the satellite network at its designated orbital position at 74°E had passed the pre-shipment review and been handed over for integration with the LVM3/M5 launch vehicle on 13 October 2025. The launch had been scheduled to take place on 26 October 2025 and the satellite would have reached its orbital position by 2 November 2025. However, as the LVM3/M5 launch vehicle was being readied for satellite integration on 13 October, a last-minute check found a problem with the engine's gimbal control. As a result, the launch had been delayed by two to three weeks. The Administration of India had explored the possibility of using an alternative launch vehicle or of relocating an in-orbit satellite to bring the frequency assignments back into use, but neither possibility was feasible. The document concluded with an analysis of the events from the point of view of the four conditions for *force majeure*, which the Administration of India considered were met. The annexes to the document provided evidence of the relevant events.

6.3.2 In Document RRB25-3/DELAYED/7, the Administration of India informed the Bureau that the CMS-03 satellite had been successfully launched on 2 November 2025 and was expected to reach its orbital slot at 93.5°E by 9 November, i.e. six days late.

6.3.3 In reply to a question from **Mr Di Crescenzo**, he confirmed that the satellite network is an additional system of the Appendix 30B, but has only Ku band with a service area covering India.

6.3.4 **Mr Di Crescenzo** observed that the Administration of India had provided technical information about the reasons for the delay and explained why there were no alternatives. It had requested a very short extension of four weeks. Moreover, the satellite had been successfully launched on 2 November 2025 and was currently in its transfer orbit. In his view, therefore, the Board should grant the extension to 30 November 2025, as requested.

6.3.5 **Mr Azzouz**, summing up the facts in the case, agreed to grant an extension of the six or seven days that would be required to bring the frequency assignments back into use once the satellite had reached its orbital position.

6.3.6 **Ms Beaumier** agreed that the case met the four conditions for *force majeure*. The satellite had been ready and would have been able to reach its orbital position before the regulatory deadline were it not for a technical problem with the launcher. The request was justified and time-limited, and she was therefore in favour of granting it.

6.3.7 **Mr Talib** said that the situation qualified as a case of *force majeure* and that he therefore agreed to grant the extension requested.

6.3.8 **Mr Henri** said that it was his understanding that the CMS-03 satellite would be used at 93.5°E for three months to bring the frequency assignments back into use and would then be moved to its primary location at 74°E. No information had been provided on the long-term use of the satellite network filing at 95.3°E; he felt uncomfortable about maintaining the filing in the absence of such information. Despite some weaknesses in the submitted information, he nevertheless agreed to grant the Administration of India a six-day extension on the basis of the situation as presented.

6.3.9 **Mr Wang (Head, SSD/SPS)** subsequently informed the Board that the Bureau had received information from the Administration of India during the present meeting to the effect that the CMS-03 satellite had reached its orbital position at 93.5°E on 8 November 2025. To be on the safe side, he proposed that the date of the extension be changed to 14 November 2025, the end of the current Board meeting.

6.3.10 The **Chair** proposed that the Board should conclude as follows on the matter:

“The Board considered the submission from the Administration of India requesting an extension of the regulatory time-limit to bring back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network, as presented in Document RRB25-3/19, and noted Document RRB25-3/DELAYED/7 for information.

The Board noted the following points:

- The regulatory time-limit for bringing back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network at 93.5°E was 3 November 2025.
- The satellite had been delivered for integration with the launch vehicle and was scheduled to be launched on 26 October 2025, with arrival at its orbital position on 2 November.
- Due to a technical problem with the launch vehicle, the launch had been delayed to 2 November 2025.
- The satellite needed up to two weeks to reach its orbital position.
- The administration had invoked a case of *force majeure* and had demonstrated how the situation had satisfied all four conditions.
- The length of the extension requested was time-limited and justified.

Consequently, the Board concluded that the situation qualified as a case of *force majeure* and decided to grant an extension of the regulatory time-limit for bringing back into use the frequency assignments to the INSAT-KUP-FSS (93.5°E) satellite network to 14 November 2025.”

6.3.11 It was so **agreed**.

**6.4 Submission by the Administration of the Islamic Republic of Iran requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the IRANDBS4-KA-G2 satellite network (Document [RRB25-3/20](#))**

6.4.1 **Mr Ciccorossi (Head, SSD/SSS)** introduced Document RRB25-3/20, in which the Administration of the Islamic Republic of Iran requested an extension of the regulatory time-limit to bring into use the frequency assignments to the IRANDBS4-KA-G2 satellite network, which had expired on 4 October 2024, on the grounds of *force majeure*. The initial contract for the design, manufacture and in-orbit delivery of the satellite had been signed in 2016, with launch planned for the first quarter of 2020. Owing to sanctions imposed on the Islamic Republic of Iran, a new manufacturer had had to be found; a new manufacturing contract had been signed in March 2020, with launch scheduled for October 2023. According to the administration, a number of *force majeure* events, including the coronavirus disease (COVID-19) pandemic and the Russian Federation-Ukraine crisis, had caused a cumulative delay of 29 months, with the launch window now set for early 2026. Thanks to its use of an 11-month schedule margin, the administration had initially submitted a request for an 18-month extension, to March 2026, to the Board's 98<sup>th</sup> meeting. It had been preparing a submission for the Board's 99<sup>th</sup> meeting when two further *force majeure* events (the attacks of 13–24 June 2025, during which the headquarters of the Islamic Republic of Iran broadcasting organization had been damaged, and the reimposition – or “snapback” – of international sanctions) had rendered it unable to do so. Those events had further delayed the project: the administration was therefore now seeking a three-year extension of the regulatory time-limit, to 4 October 2027. It had also submitted a similar extension request, regarding the IRN-TTC-34 satellite network, for the Board's consideration (see Documents RRB25-3/20 and RRB25-3/DELAYED/8 and § 6.6 below).

6.4.2 **Mr Azzouz**, summarizing the situation as it related to both the IRANDBS4-KA-G2 and the IRN-TTC-34 satellite networks – for which the regulatory time-limits were 4 October 2024 and 9 January 2026, respectively – said that the administration had faced co-passenger delay and multiple *force majeure* events that had affected its satellite project, despite its best efforts. While some of those events had occurred at a time when the administration would still have been able to comply with the regulatory time-limit of 4 October 2024, others had resulted in considerable delays requiring an extension of that time-limit. In his view, there was clear evidence of co-passenger delay and *force majeure* events. What the submission lacked was the contract with the satellite manufacturer, letters regarding the changes to the launch window and supporting information to justify an extension of either 18 months or three years. Additional information on the situation following the *force majeure* events of 2025 would be useful. He was of a mind to request the administration to provide the information and supporting documentation needed and to instruct the Bureau to maintain the frequency assignments until the end of the 101<sup>st</sup> Board meeting.

6.4.3 **Ms Mannepalli** said that the administration's more detailed submission, which she welcomed, chronicled the efforts it had made to address various challenges caused by several *force majeure* events. Those efforts had included changing satellite manufacturer, switching from a dual to a single payload launch and sourcing local rather than imported components due to sanction-related restrictions. She was satisfied that the *force majeure* conditions had been met. Having initially sought an 18-month extension of the regulatory time-limit of 4 October 2024, the administration was now seeking an increased extension of three years in total owing to two more recent events – the June 2025 attacks and the snapback sanctions. More information was needed to justify that request.

6.4.4 **Mr Talib, Mr Nurshabekov** and **Mr Cheng** agreed with previous speakers that there was evidence of *force majeure*, that more information should be requested to enable the Board to determine the extension needed and that the frequency assignments should be taken into account until the end of the Board's 101<sup>st</sup> meeting.

6.4.5 **Mr Di Crescenzo** and **Mr Talib** agreed that there was a link between the cases relating to the IRANDBS4-KA-G2 and IRN-TTC-34 satellite networks.

6.4.6 **Mr Di Crescenzo** said that he would support granting an extension to the regulatory time-limits in both cases on the grounds of *force majeure*.

6.4.7 **Ms Beaumier**, recalling that the Board had considered the request for an 18-month extension of the regulatory time-limit with regard to the IRANDBS4-KA-G2 satellite network at its 97<sup>th</sup> and 98<sup>th</sup> meetings, said that she welcomed the more detailed information that had been provided by the Administration of the Islamic Republic of Iran to aid the Board in understanding the nature and impact of the *force majeure* events. Each of those *force majeure* events had to be considered individually to determine whether the conditions had been met. In her view, the delays caused by the COVID-19 pandemic did not qualify as *force majeure*, since the administration would still have been able to launch in September 2024, within the existing regulatory time-limit. It however served to demonstrate that the administration had begun activities to build and launch a satellite in good time.

6.4.8 As for the remaining *force majeure* events, not enough information had been provided to demonstrate why, for example, the administration had found it impossible to overcome the effects of sanctions imposed as a result of the Russian Federation-Ukraine crisis. Other administrations facing similar situations had terminated contracts or made alternative arrangements with other parties not subject to those sanctions. While the Administration of the Islamic Republic of Iran had more limited options, it had not demonstrated what, if any, other options it had pursued. The third condition of *force majeure*, that the event must make it impossible – not merely difficult – for the obligor to perform its obligation, had not been met; more information should therefore be provided. Similarly, no supporting evidence had been furnished to substantiate the damage caused to certain facilities and ground equipment by the June 2025 attack, justify the additional delays incurred or account for the extension requested. In addition, it was unclear whether the satellite would have been ready for launch in September 2025, given that, according to information in the submission, the assembly, integration and testing phase only began in June. Lastly, the snapback sanctions, which had been imposed by the United Nations, not unilaterally by a single country, could have been foreseen and possibly avoided: such sanctions were lifted or reapplyed by the international community depending on whether certain conditions had been met. At its 84<sup>th</sup> meeting, the Board, in its consideration of a similar case, had sought the advice of the ITU Legal Adviser and concluded that sanctions might not necessarily meet the *force majeure* conditions (see Document RRB20-2/30).

6.4.9 **Ms Hasanova** said she agreed that the third condition of *force majeure* had not been met. Moreover, there was no evidence to support a three-year extension. She was of the view that the Board could not accede to the administration's request at the current time.

6.4.10 **Mr Henri** stressed that there was an absence of substantive new information compared with that submitted to the Board's 98<sup>th</sup> meeting, apart from the references to the June 2025 attacks and snapback sanctions. While he recognized that there were some elements that could be qualified as *force majeure*, there was little in the way of substantiating evidence to prove that all four *force majeure* conditions had been met and to warrant an extension to late 2027. He was unconvinced that the June 2025 attacks and the snapback sanctions could be qualified as *force majeure* events, in particular the sanctions for which legal advice could be welcome. He considered those issues to be beyond the scope of the Board's mandate. He, too, considered that the Board was not in a position to accede to the administration's three-year extension request. Information to support the initial additional 18-month extension requested, such as on the status of the satellite project before and after the events of 2025, should nevertheless be sought to clear that request before considering the new one.

6.4.11 **Mr Fianko** and **Ms Hasanova** said that, while there were undoubtedly elements of *force majeure*, proof that all of the conditions had been met was lacking. It was difficult to see a direct link between the June 2025 attacks, the snapback sanctions and the impact on satellite manufacturing, for example. **Mr Fianko** said that he agreed with other speakers that the administration should be given the chance to provide additional, more specific information, with a view to enabling the Board to make a decision at its 101<sup>st</sup> meeting.

6.4.12 **Mr Azzouz** suggested that, should the Board agree that the initial 18-month extension was justified in the case of the IRANDBS4-KA-G2 satellite network, then the regulatory time-limit for the IRN-TTC-34 satellite network, which was currently 9 January 2026, should be extended to the same date in March or April 2026. The Board could then consider whether the additional 18-month extension requested for both satellite networks was justified on the basis of the events of 2025.

6.4.13 **Ms Mannepalli** clarified that the administration first needed to prove that all four *force majeure* conditions had been met and that the project could have been successfully launched within the initial 18-

month extension period had it not been for the events of 2025. No decision had yet been made as to whether to grant that initial extension.

6.4.14 Following informal discussions on whether to request additional information and instruct the Bureau to take into account the frequency assignments until the end of the Board's 101<sup>st</sup> meeting, the **Chair** proposed that the Board should conclude on the matter as follows:

"The Board considered in detail the request of the Administration of the Islamic Republic of Iran for an extension of the regulatory time-limit for bringing into use the frequency assignments to the IRANDBS4-KA-G2 satellite network as presented in Document RRB25-3/20.

The Board noted the following points:

- The Administration of the Islamic Republic of Iran had provided additional information that demonstrated that most conditions of *force majeure* had been satisfied to justify the 18-month extension requested in its previous submissions.
- The administration had presented the key milestones with estimated revised times to their completion, arguing that various *force majeure* events had caused a cumulative programme delay of approximately 29 months.
- The administration had made efforts to reduce the delay from 29 to 18 months.
- The administration had not demonstrated that it had pursued all options to avoid being impacted by the sanctions resulting from the Russian-Ukraine crisis, such as making arrangements with a different manufacturer not subject to those sanctions.
- In addition to the *force majeure* events submitted to the 98<sup>th</sup> Board meeting, the administration had identified two additional *force majeure* events, the June 2025 attacks and the United Nations snapback sanctions imposed in September 2025, that were said to have impacted the IRANDBS4-KA-G2 project.
- Based on those additional two events, a three-year extension to the regulatory time-limit for bringing the subject assignment of the network into use had been requested.
- The administration had provided the information that a satellite was scheduled to be launched in the first quarter of 2026 but had presented no evidence to demonstrate that the regulatory time-limit could have been met in the absence of the two additional events.
- While the impact of those two events had been described, no information had been provided to demonstrate that all four *force majeure* conditions had been satisfied or to justify the additional 18-month extension requested.
- The United Nations snapback sanctions would not necessarily qualify as a *force majeure* event.

While the Board recognized some elements of *force majeure*, in view of the lack of supporting information and substantive evidence to justify the request from the Administration of the Islamic Republic of Iran, the Board concluded that it was not in a position to accede to the request for an extension of the regulatory time-limit for bringing into use the frequency assignments to the IRANDBS4-KA-G2 satellite network. The Board invited the Administration of the Islamic Republic of Iran to provide, at the 101<sup>st</sup> Board meeting, the information and supporting documentation agreed at the 13<sup>th</sup> Plenary Meeting of WRC-23 (see § 13.4 of Document WRC23/528), including the project milestones and the status of the satellite network construction before and after the June 2025 and September 2025 events. Clarifications should be provided as to whether other options had been considered or pursued to avoid being impacted by the sanctions resulting from the Russian-Ukraine crisis.

In addition, the Board instructed the Bureau to take into account the frequency assignments to the IRANDBS4-KA-G2 satellite network until the end of the 101<sup>st</sup> Board meeting."

6.4.15 It was so **agreed**.

**6.5 Submission by the Administration of the Republic of Korea requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the KOMPSAT-6 satellite network (Document [RRB25-3/21](#))**

6.5.1 **Mr Tham (Head, SSD/USS)** introduced Document RRB25-3/21, in which the Administration of the Republic of Korea requested a further eight-month extension of the regulatory time-limit for bringing into use the frequency assignments to the KOMPSAT-6 satellite network owing to a co-passenger delay. The Board had granted a first extension at its 94<sup>th</sup> meeting, for reasons of *force majeure*. It had granted further extensions at its 97<sup>th</sup> and 99<sup>th</sup> meetings, on the grounds of co-passenger delay. The current request for an extension, from 28 February to 31 October 2026, had been made because the co-passenger was still not ready. The administration's request was backed up by the information provided in the annexes to the document.

6.5.2 In reply to a question from **Mr Nurshabekov**, he said that the Bureau had not been informed of the identity of the co-passenger.

6.5.3 **Ms Mannepalli** observed that the present request was the third made on the basis of a co-passenger delay over a period of two years and wondered whether the Administration of the Republic of Korea had explored the possibilities of launching the satellite as the main payload or of making alternate launch arrangements. She would find it difficult to accede to the request if no such efforts had been made.

6.5.4 **Mr Azzouz** said that the events described in the document were beyond the control of the administration and the operator. Furthermore, it would be difficult for the administration to change launch service provider after all the time it had already invested in the project. He therefore agreed to grant the request for a further extension to 31 October 2026.

6.5.5 **Mr Fianko** expressed concern at the persistent delays on the grounds of co-passenger delay. The submission did not provide information on what difficulties had been encountered with the main payload or specific dates for the launch window. He also wondered, like Ms Mannepalli, whether the administration had considered alternative launch options. The case as presented qualified as one of co-passenger delay, but he would nevertheless prefer to ask the Administration of the Republic of Korea to provide clear information to the Board, at the next meeting, on the launch window and on any action it could take in the event that the main payload continued to experience problems.

6.5.6 **Mr Cheng, Mr Talib and Ms Hasanova** said that it was clear from the material provided by the administration, including the launch service contract and a letter from the launch service provider, that the case was one of co-passenger delay. They therefore considered that the extension could be granted on that basis.

6.5.7 **Mr Nurshabekov** said that in principle he had no objection to granting the extension, even though the information provided in the submission was not complete.

6.5.8 **Ms Beaumier** said that she shared the reluctance of some Board members to specify the duration of the extension without having a specific launch window. KOMPSAT-6 was a small satellite, and she therefore understood why it was a co-passenger; knowing the identity of the main passenger would certainly help the Board understand why the delays kept occurring. She was of two minds about granting the extension but would feel more comfortable if the launch window dates were clarified.

6.5.9 **Mr Henri** agreed that it would have been useful to know the identity of the primary payload, and in particular its launch status and the associated launch window. As KOMPSAT-6 was a small satellite, he understood that there might not have been an alternative in terms of launch as primary payload. In a letter to the Korea Aerospace Research Institute dated 15 October 2025 (Annex 4 to Document RRB25-3/21), Arianespace supported the request for an extension to 31 October 2026, which appeared to provide some assurance that the satellite would be at the right orbital position or within the right orbital parameters by that time. He considered that the case qualified as one of co-passenger delay and would be willing to grant one more extension but would feel more comfortable doing so if the Administration of the Republic of Korea were requested to provide more precise information on the requested extension, in particular on the satellite launch window.

6.5.10 **Mr Di Crescenzo** said that, while the case was clearly one of co-passenger delay, the Administration of the Republic of Korea should be asked to provide information on the launch window before the Board reached a conclusion.

6.5.11 The **Chair** observed that similar cases might be brought before the Board in the future and that the administrations concerned could cite the present case as setting a precedent for the amount of information to be provided. Moreover, according to WRC decisions on the subject, the Board had to be provided with information on the initial and revised project milestones for the launch window, the launch and the orbit-raising process. He would also feel more comfortable if the Board asked for additional information before reaching a conclusion, and therefore proposed that the Board should conclude as follows on the matter:

“The Board considered the submission from the Administration of the Republic of Korea requesting an eight-month extension of the regulatory time-limit for bringing into use the frequency assignments to the KOMPSAT-6 satellite system, to 31 October 2026, as presented in Document RRB25-3/21.

The Board noted the following points:

- The launch service provider had again postponed the launch of the KOMPSAT-6 satellite owing to delays in the preparation of the co-passenger.
- The administration had requested an extension, from 28 February 2026 to 31 October 2026, based on the recommendation of the launch service provider, without providing a clear launch window.

Consequently, the Board concluded that the situation qualified as a case of co-passenger delay. However, the length of the extension requested had not been fully justified. The Board therefore invited the Administration of the Republic of Korea to provide the 101<sup>st</sup> Board meeting with detailed information and a revised launch window, with supporting evidence to justify the requested extension.

The Board instructed the Bureau to retain the frequency assignments to the KOMPSAT-6 satellite network in the Master International Frequency Register until the end of the 101<sup>st</sup> Board meeting.”

6.5.12 It was so **agreed**.

## 6.6 Submission by the Administration of the Islamic Republic of Iran requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the IRN-TTC-34 satellite network (Documents [RRB25-3/23](#) and [RRB25-3/DELAYED/8](#))

6.6.1 **Mr Wang (Head, SSD/SPS)** introduced Document RRB25-3/23, in which the Administration of the Islamic Republic of Iran requested an extension of the regulatory time-limit of 9 January 2026 to bring into use the frequency assignments to the IRN-TTC-34 satellite network on the grounds of *force majeure*. The administration had documented those *force majeure* events, in particular the attacks of June 2025 and the imposition of snapback sanctions, in Document RRB23-3/20 on the extension requested in relation to the IRANDBS4-KA-G2 satellite network (summarized in § 6.4 above). In Document RRB25-3/DELAYED/8, the administration provided further background information on the IRN-TTC-34 satellite network, including that it was filed under Article 2A of Appendices **30** and **30A** and that it was intended to provide the telemetry, tracking and command functions for the corresponding satellite network in Planned BSS service. As the assignments to IRN-TTC-34 satellite network would be brought into use on the same satellite platform as the IRANDBS4-KA-G2 satellite network, the administration was therefore requesting that the regulatory time-limit for the IRN-TTC-34 and the IRANDBS4-KA-G2 satellite networks be extended to the same date, 4 October 2027.

6.6.2 The Board’s discussion of the merits of the case is summarized in §§ 6.4.2–6.4.13 above.

6.6.3 The **Chair** said that, while there were clear linkages between the administration’s submissions concerning the IRN-TTC-34 and the IRANDBS4-KA-G2 satellite networks, certain elements differed, such as the maturity of the projects and the length of extension being requested. In the current case, a 21-month extension, to 4 October 2027, was being sought.

6.6.4 **Mr Talib** noted that the information provided on the IRN-TTC-34 satellite network was brief and relied on the information provided under agenda item 6.4.

6.6.5 **Mr Henri** said he agreed that the cases were linked; at the same time, each case should be considered on its own merits, evidence and supporting documentation. As with agenda item 6.4, the Board could consider additional information at its 101<sup>st</sup> meeting.

6.6.6 Following informal discussions on whether to request additional information and instruct the Bureau to take into account the frequency assignments until the end of the Board's 101<sup>st</sup> meeting, the **Chair** proposed that the Board should conclude on the matter as follows:

"The Board considered in detail the request of the Administration of the Islamic Republic of Iran for an extension of the regulatory time-limit for bringing into use the frequency assignments to the IRN-TTC-34 satellite network, as presented in Document RRB25-3/23, and noted Document RRB25-3/DELAYED/8 for information.

The Board noted the following points:

- With reference to the same reasons explained in Document RRB25-3/20, the administration indicated that it would no longer be able to fulfil its obligation to bring the frequency assignments to the IRN-TTC-34 satellite network into use by the current regulatory deadline.
- The administration stated that the IRN-TTC-34 filing was intended to be brought into use on the same satellite platform as the one used for the IRANDBS4-KA-G2 satellite network.
- In support of the request for the IRN-TTC-34 satellite network, no evidence had been provided about the satellite manufacturer, the status of satellite construction, the scheduled co-platform launch and project milestones before and after the *force majeure* events.
- While the administration had invoked the application of *force majeure*, citing the impact of attacks in June 2025 and the reimposition of United Nations snapback sanctions, no supporting evidence had been provided to substantiate those factors or how they had been assessed as satisfying the four conditions for the situation to qualify as a case of *force majeure*.
- Furthermore, the administration had provided no evidence to justify the extension of the regulatory time-limit by 21 months.

Consequently, the Board concluded that, given the considerable lack of supporting information, it was not in a position to grant an extension of the regulatory time-limit for bringing into use the frequency assignments to the IRN-TTC-34 satellite network. The Board invited the Administration of the Islamic Republic of Iran to provide, at the 101<sup>st</sup> Board meeting, the information, evidence and supporting documentation agreed at WRC-23, especially the project milestones, before and after June 2025, and the effects on the Iranian satellite project.

In addition, the Board instructed the Bureau to continue to take into account the frequency assignments to the IRN-TTC-34 satellite network until the end of the 101<sup>st</sup> Board meeting."

6.6.7 It was so **agreed**.

## 6.7 Submission by the Administration of the Sultanate of Oman requesting an extension of the regulatory time-limit to bring into use the frequency assignments to the OMANSAT-73.5E satellite network (Documents [RRB25-3/27](#) and [RRB25-3/DELAYED/3](#))

6.7.1 **Mr Ciccorossi (Head, SSD/SSS)** introduced Document RRB-25/27, in which the Administration of Oman requested a further extension of the regulatory time-limit for bringing into use the frequency assignments to the OMANSAT-73.5 satellite network, from 13 December 2025 to 8 November 2026. Since the previous Board meeting, the administration had selected Airbus Defence and Space as the prime contractor for the project, and the relevant contract would be finalized by the end of 2025. The orbit transfer vehicle provider, Epic Aerospace, had informed the orbit service provider, Infinite Orbits, that the launch window for the OG2 gap-filler satellite had been rescheduled for 20 January to 20 July 2026, owing to unforeseen schedule changes requested by the launch service provider, SpaceX, as a result of delays faced

by the primary payload, the CHIMERA GEO-2 mission. The satellite was expected to reach its geostationary orbit at 73.5°E on 1 November 2026. An additional week had been built into the extension request to allow for any meteorological events. The document provided information on the mission timelines, which were confirmed in the appended correspondence from Airbus Defence and Space, Infinite Orbits and Epic Aerospace.

6.7.2 In Document RRB25-3/DELAYED/3, the Administration of Oman confirmed that the contract to manufacture the OMANSAT-73.5E satellite had been awarded to Airbus Defence and Space.

6.7.3 **Mr Azzouz** commended the efforts made by the Administration of Oman to successfully implement its first national satellite, including by ensuring that all issues had been resolved before the end of the suspension period. Outlining the chronology in the case as also described at the Board's 98<sup>th</sup> and 99<sup>th</sup> meetings, he considered that the co-passenger delay suffered by the OG2 gap-filler satellite was due to the non-readiness of the primary payload and was beyond the control of the Administration of Oman. He was therefore in favour of granting the extension to 8 November 2026, including the one-week margin for meteorological events. In its decision at the 99<sup>th</sup> meeting, the Board had granted a similar margin, considering that it was not uncommon for launch dates to be delayed by a few days.

6.7.4 **Ms Hasanova**, citing the information provided by the Administration of Oman regarding the satellite manufacturer, the mission timelines, the new launch schedule, the satellite's arrival at its orbital position and the delay caused by the unreadiness of the primary payload, considered that the administration had provided enough elements to support the requested extension to 8 November 2026.

6.7.5 **Mr Talib** also considered that the Administration of Oman had provided sufficient information regarding the co-passenger delay and the efforts made to implement the project. He therefore agreed to grant the extension requested.

6.7.6 **Mr Nurshabekov** said that the Administration of Oman had clearly made every effort to meet the original timelines but had been unable to do so for the reasons cited in the document. He, too, agreed to grant an extension to 8 November 2026.

6.7.7 **Ms Mantepalli** observed that the Board had asked the Administration of Oman at its 99<sup>th</sup> meeting about its longer-term plans for using the OG2 gap-filler satellite. Clearly progress had been made in the case, with a manufacturer having been selected. She found the new launch window of six months to be very long but noted that the information had been provided by Epic Aerospace and not the actual launch service provider, SpaceX, which could probably have defined a narrower window of roughly three months. It was unfortunate that the submission did not contain the correspondence between SpaceX and Epic Aerospace on the matter. She was inclined to grant the request but did have some difficulty with the length of the launch window.

6.7.8 **Mr Cheng** noted that the Board had granted the Administration of Oman an earlier extension, to 13 December 2025, based on a situation of *force majeure*. At the current meeting, the administration was asking for an extension on the grounds of co-passenger delay, as justified by a letter from the OG2 orbit transfer vehicle provider. The submission did not, however, contain information on the primary payload, the launch service contract or a letter from the launch provider, all of which were, to his understanding, required in such cases. He was therefore not convinced that the Board had sufficient information to decide that the case qualified as one of co-passenger delay. He suggested that the frequency assignments to the OMANSAT-73.5 satellite network be maintained until the end of the 101<sup>st</sup> Board meeting and that the Administration of Oman be asked to provide more detailed information on the primary payload and evidence from the launch service provider, including the launch service contract, as required pursuant to the minutes of the Thirteenth Plenary Meeting of WRC-23.

6.7.9 The **Chair** observed that there were two issues in the case: the length of the launch window and the possibility that it might be updated to a shorter time-frame; and the need to provide the Board with the contract of the launch service provider when deciding on a case of co-passenger delay.

6.7.10 **Mr Azzouz** said that the launch window had not been decided by the satellite operator (Space Communications Technologies SPC) but by Epic Aerospace and that the actual launch might take place at the end of the six-month window. The Board usually calculated the time required for orbit raising as of the last day of the launch window. In the current case, the Board should take into account the full six-month launch window if it granted the request.

6.7.11 **Ms Mannepalli** said that she could agree to allow for the full launch window. With regard to the contract of the launch service provider, the Board could take account of the information and documents provided at previous meetings.

6.7.12 **Mr Cheng** said that he had no strong views on either issue and could agree to grant the extension if the majority of Board members so decided.

6.7.13 **Ms Beaumier** noted that the CHIMERA GEO-2 satellite was itself a secondary payload. The project of the Administration of Oman had suffered from delays that had been compounded by other delays, and she therefore felt some sympathy for the administration's plight. That said, she could not recollect that the Board had ever granted an extension based on a six-month launch window. She agreed with Mr Cheng that it would have been useful to have the communications between SpaceX and Epic Aerospace to confirm the additional delay. She had no difficulty in principle in supporting an extension on the grounds of co-passenger delay but did not think that the Board had the information it needed to decide on the length of the extension.

6.7.14 **Mr Henri** considered that the launch window of a six months was more information on a launch opportunity than a launch window as such and definitely too long. He also considered that the submission contained second-hand launch information, which is acceptable: it was his understanding that Epic Aerospace was, after all, in charge of the launch. More precise information from SpaceX would however be welcome. The Board did not, as a matter of principle, accede to requests for additional time for contingencies, such as meteorological events, and should not do so in the current case. He had no difficulty in principle to grant the request for extension but suggested that the Board should be specific about the additional information required from the Administration of Oman to compete consideration of the case at the next meeting.

6.7.15 The **Chair** proposed that the Board should conclude as follows on the matter:

"The Board considered in detail the submission from the Administration of Oman requesting an eleven-month extension of the regulatory time-limit for bringing into use the frequency assignments to the OMANSAT-73.5E satellite network, as presented in Document RRB25-3/27, and noted Document RRB25-3/DELAYED/3 for information.

The Board noted the following points:

- The launch of the OG2 satellite, contracted as an interim satellite to bring into use the frequency assignments within the regulatory time-limit, had been delayed by unforeseen schedule changes requested by the launch provider due to delays faced by its primary payload. The launch had been rescheduled with a new launch window from 20 January 2026 to 20 July 2026.
- An extension had been requested from 13 December 2025 to 8 November 2026, based on a new six-month launch window and the time needed for the satellite to reach its orbital position.
- No supporting documentation had been provided by the launch service provider regarding a contract or the launch delay.

Based on the information provided at the current and previous Board meetings, the Board concluded that the current situation might qualify as a case of co-passenger delay but that it was not in a position to accede to the request from the Administration of Oman as things stood. The Board invited the Administration of Oman to provide additional information, including supporting evidence from the launch service provider, to support a more precise launch window and the length of the extension requested, to the 101<sup>st</sup> Board meeting.

In addition, the Board instructed the Bureau to retain the frequency assignments for the OMANSAT-73.5E satellite network until the end of the 101<sup>st</sup> Board meeting."

6.7.16 It was so **agreed**.

**7 Submission by the Administration of Cyprus requesting regulatory leniency to bring into use and bring back into use the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks at 89.5°E (Documents [RRB25-3/2](#) and [RRB25-3/16](#))**

**Submission by the Administration of Malaysia in response to the submission by the Administration of Cyprus requesting regulatory leniency to bring into use and bring back into use the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks at 89.5°E (Documents [RRB25-3/6](#) and [RRB25-3/DELAYED/2](#))**

7.1 **Mr Loo (Head, SSD/CSS)**, introducing the item, said that the case concerned the ONETEL-89.5E and KYPROS-ORION satellite networks at the 89.5°E orbital position; the regulatory time-limits were 1 December 2024 and 5 August 2024, respectively. On 4 September 2024, the Administration of Cyprus had informed the Bureau of the bringing into use and bringing back into use, respectively, of the frequency assignments to the ONETEL-89.5E and the KYPROS-ORION satellite networks, and on 27 January 2025, requested the suspension of the two network filings from 16 August 2024. In response to the Bureau's enquiry under No. **13.6**, The administration had provided evidence that the GS-1 satellite reached the orbital position of 89.5°E around 17 May 2024, but no evidence was provided that the satellite was maintained at this position for the required period of 90 days, as required by the provisions of Nos. 11.44B and 11.49.1 of the Radio Regulations. On 25 March 2025, the administration was informed that, in the absence of evidence that the satellite had been deployed and maintained at the notified orbital position for a continuous period of 90 days, in accordance with No. **11.44B**, the Bureau would request the Board's approval to cancel the frequency assignments. On 3 June 2025, the administration had requested a tolerance waiver of  $\pm 2.7$  degrees; it was advised to submit its case to the Board. 7.2 In Document RRB25-3/2, the Administration of Cyprus requested regulatory leniency in the form of a tolerance waiver of  $\pm 2.7$  degrees. It justified that request on the grounds of an unforeseeable in-orbit anomaly, occurring on 5 July 2024, that had impaired the satellite's station-keeping function, leading to its gradual 2.7-degree drift westward before the end of the 90-day bringing-into-use period. The administration emphasized that there had been no impact on adjacent satellites, and had not caused any harmful interference to nearby satellites. In Document RRB25-3/16, it stated that a *force majeure* event – namely unforeseeable high levels of solar activity – had caused the anomaly. In the annexed mission completion report, the satellite operator outlined how, in its view, that event, which had resulted in loss of communications with the spacecraft, met the four *force majeure* conditions. Despite the anomaly, it said, the satellite had remained within the 89.5°E  $\pm 2.7$ ° corridor, although its station-keeping capacity had been compromised. Among the annexed documents were plot charts of the gradual longitudinal drift between 17 May and 14 August 2024, and links to publicly available information to substantiate the claim of *force majeure* owing to solar activity.

7.3 In Document RRB25-3/6, the Administration of Malaysia, responding to the request of the Administration of Cyprus, emphasized that the 90-day requirement had been introduced by WRC-12 to ensure genuine use of and equitable access to orbital and spectrum resources and to discourage the use of practices such as spectrum warehousing. The Administration of Malaysia further referred to the Radio Regulations and the Rules of Procedure, according to which a space station must have the capacity to remain within  $\pm 0.1$  degrees of its nominal position, with a tolerance extending up to  $\pm 0.5$  degrees, provided that no unacceptable interference was reported. It was concerned that the situation contravened No. **11.44B**, as the space station had maintained its position within  $\pm 0.1$  degrees of its nominal position for only half of the 90-day requirement and the maximum allowable deviation of  $\pm 0.5$  degrees had been exceeded. The Administration of Malaysia also noted that the Ka-band frequency assignments had been brought into and brought back into use several times since 2018.

7.4 In Document RRB25-3/DELAYED/2, the Malaysian Administration addressed the *force majeure* claim, stating that the four *force majeure* conditions had not been met. It noted that, while the solar prominence of 5 July 2024 had occurred at the peak of a period of high solar activity, routine space weather alerts had been issued and the event's intensity had remained within expected operational thresholds for

geostationary missions. It highlighted other elements of concern, such as the use of a cube satellite (CubeSat), which was inherently less resilient than a conventional geostationary satellite; the satellite operator's decision to conduct the mission during a period of heightened solar activity; and the fact that the bringing into use period had not been extended so as to meet the 90-day station-keeping period. The administration also contended that, in the absence of any firm plans to launch a satellite since 2018, the repeated bringing or bringing back into use of the Ka-band frequency assignments over a prolonged nine-year validity period, rather than the regulatory seven years, amounted to deliberate warehousing of the orbital slot and frequency assignments.

7.5 Following questions from **Mr Henri** and **Ms Mannepalli**, on the status of and long-term plans for the network filing, on the number of times that the GS-1 satellite had been used to bring frequency assignments into use, and on the Bureau's communications with the Administration of Cyprus, **Mr Loo (Head, SSD/CSS)** explained that the KYPROS-ORION satellite network had been brought into use on 29 December 2017 and suspended from 4 May 2018. It had subsequently been brought back into use and suspended twice, namely on 4 May and 5 August 2021 and on 17 May and 16 August 2024. Including the KYPROS-ORION and ONETEL-89.5E satellite networks, the GS-1 satellite had been used to bring into use, or partially bring into use, seven satellite networks at three orbital positions. According to the information contained in Document RRB25-3/16, the satellite operator was pursuing its efforts to build and launch a satellite, although a contract had yet to be finalized. Lastly, all concerned correspondence between the Bureau and the administration would be provided to the Board in future submissions.

7.6 **Mr Cheng** and **Ms Beaumier** said that it was unclear what the Administration of Cyprus was asking the Board to do. On the one hand, the administration requested regulatory leniency; on the other, it cited *force majeure* conditions but did not seek an extension of the regulatory time-limit. **Ms Beaumier** concluded that the case should be treated as a regulatory leniency request.

7.7 **Mr Cheng**, **Ms Beaumier**, **Ms Mannepalli**, **Ms Hasanova** and **Mr Nurshabekov** agreed that the Radio Regulations and the Rules of Procedure were clear with regard to the 90-day and station-keeping requirements. The Board had no authority to deviate from those provisions or to accede to a request for regulatory leniency.

7.8 **Ms Beaumier** said that, at the 99<sup>th</sup> Board meeting, she had noted that similar submissions had been presented as requests for an extension of the regulatory time-limit, and she had encouraged the Administration of Cyprus to update its submission accordingly (see Document RRB25-2/21, § 2.3). While the administration had subsequently provided information regarding the four *force majeure* conditions, it had continued to request leniency instead of an extension. Even if the Board were to consider whether the case met the conditions of *force majeure*, the arguments presented by the Administration of Malaysia were persuasive: the solar activity had been foreseeable, with the 2025 solar cycle having been forecast to reach its peak in July 2024. It was unclear why that fact had not been taken into account during the GS-1 mission-planning phase. Satellite operators were expected to anticipate such conditions and implement avoidance strategies, and spacecraft usually had built-in redundancy to deal with such events. Moreover, there seemed to be no specific plans to build and launch a replacement satellite, even though the Administration of Cyprus had submitted its first satellite network filing for the position in 2011. In her view, there were no grounds on which the Board could accede to the request or grant an extension.

7.9 **Mr Azzouz** said that he had noted in particular the following points about the GS-1 satellite: it was a 25 kg CubeSat, with an expected lifetime of six years; given its low-thrust electric propulsion system, it was less resilient than other types of geostationary satellites to the conditions of space; it had been used as a gap-filler for the bringing and bringing back into use and suspension of the frequency assignments; and it had maintained the nominal orbital position at 89.5°E for just 49 days, from 17 May to 4 July 2024 within ±0.5 degrees as no interference occurred. Not only had it not met the 90-day requirement, as established by No. **11.44B**, but it had also drifted ±2.7 degrees by 14 August 2024, which is beyond the maximum allowable deviation of ±0.5 degrees. In addition, he saw no link between the *force majeure* conditions and the satellite's station-keeping function. The peak of the solar cycle had been the subject of routine space-weather alerts and the intensity had been within operational thresholds for geostationary missions. In his view, practices such as spectrum warehousing should be discouraged to ensure optimum and equitable use of orbital

positions and spectrum resources. That issue should be included in the Board's report under Resolution **80 (Rev.WRC-07)** to WRC-27.

7.10 **Ms Manneppalli** and **Mr Henri** said it was concerning that, while the frequency assignments to the KYPROS-ORION satellite network had been suspended and brought back into use multiple times, there was still no long-term arrangement or contract in place for the deployment of a real satellite. **Mr Henri** added that the frequency assignments had spent more time in suspension than in operation, suggesting a degree of spectrum warehousing.

7.11 **Ms Manneppalli** said that she agreed with other Board members that the decision to use a CubeSat had been risky; the solar activity had been predictable and CubeSats were less able to withstand intense solar flares. Even had the administration instead requested an extension of the regulatory time-limit, she considered that the event would not qualify as one of *force majeure*.

7.12 **Mr Henri** said that he, too, considered that the event did not meet the *force majeure* threshold. The solar activity of July 2024, if more intense than average, had been foreseen. Moreover, there was an inherent risk associated with using a small off-the-shelf CubeSat to bring or bring back into use the frequency assignments. The CubeSat lacked redundancy and resiliency to space conditions and was already in its third orbital location since 2023. The Board could not accede to a request for leniency under No. **11.44B**.

7.13 **Mr Cheng** agreed, adding that since the small CubeSat had already been in orbit for quite some time to service seven satellite networks, the station-keeping malfunction was foreseeable.

7.14 The **Chair** clarified that had the satellite drifted by, say,  $\pm 0.6$  degrees, it would still have contravened the maximum threshold established by No. **11.44B**. The Board had no mandate to make exceptions in that regard.

7.15 **Ms Hasanova** agreed with previous speakers. The satellite had not remained at the notified orbital position for the required 90-day period. In her view, the Administration of Cyprus had misused the orbital position and lacked a real long-term satellite project. She and **Ms Beaumier** said that the Bureau had acted correctly in applying the Radio Regulations.

7.16 The **Chair** proposed that the Board conclude on the matter as follows:

"The Board considered in detail Documents RRB25-3/2 and RRB25-3/16 from the Administration of Cyprus, and Document RRB25-3/6 from the Administration of Malaysia, concerning the request of the Administration of Cyprus for regulatory leniency to bring into use and bring back into use the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks at 89.5°E. The Board also noted Document RRB25-3/DELAYED/2 from the Administration of Malaysia for information.

The Board noted the following points:

- On 25 March 2025, the Bureau had communicated to the Administration of Cyprus that it could not consider the frequency assignments to the ONETEL-89.5E and KYPROS-ORION satellite networks as having been brought into use or brought back into use, respectively, within the regulatory period since the GS-1 satellite had not been maintained within  $\pm 0.5$  degrees of the notified orbital position at 89.5°E for a continuous period of 90 days after 17 May 2024, a fact confirmed by the notifying administration.
- On 6 June 2025, the Bureau had informed the Administration of Cyprus that the request for regulatory leniency was beyond the mandate of the Bureau and advised the notifying administration to submit its request to the Board no later than 23 June 2025.
- The Board did not have the authority to make decisions that were contrary to the provisions of the Radio Regulations and the Rules of Procedure.
- The GS-1 satellite had been maintained at the 89.5°E orbital position for only approximately 49 days, from 17 May 2024 to 3 July 2024.

- The GS-1 satellite had suffered from a high level of solar activity that had impaired its ability to maintain its nominal station-keeping function, leading to a westward drift of 2.7 degrees by the end of the bringing-into-use period.
- The Administration of Cyprus had presented the mission anomaly as a *force majeure* event and addressed the four conditions of *force majeure* but had not requested an extension of the regulatory time-limit.
- There were inherent risks assumed by the satellite operator in using gap-filler satellites with less resilient components or adequate protection from the harsh conditions of space. There were no concrete plans to build and launch a replacement satellite, even though the first satellite network filing for the position had been submitted in 2011.

While the case had not been submitted and was not treated as a request to extend a regulatory time-limit due to *force majeure*, the Board considered that the situation did not qualify as a case of *force majeure* since the high level of solar activity was foreseeable and operators were expected to anticipate such conditions and implement appropriate mitigation strategies.

Consequently, the Board decided not to accede to the request from the Administration of Cyprus for leniency regarding the bringing or bringing back into use of the ONETEL-89.5E and KYPROS-ORION satellite networks, as the satellite had not been maintained within 0.5 degrees of the notified orbital position at 89.5°E for a continuous period of 90 days, in accordance with Nos. **11.44B** and **11.49.1**."

7.17 It was so **agreed**.

## 8 Submission by the Administration of Canada requesting an extension of the first milestone period (M1) for the MULTUS satellite system (Documents [RRB25-3/5](#) and [RRB25-3/24](#))

8.1 **Mr Ciccorossi (Head, SSD/SSS)** said that Document RRB25-3/24 supplemented the information provided in Document RRB25-3/5, consideration of which had been deferred from the previous meeting and in which the Administration of Canada had originally requested an extension of the first milestone period (M1) for the MULTUS satellite system, from 28 June 2025 to 31 March 2026; that request had been shortened to 6 January 2026 in Document RRB25-3/24. The request was based on *force majeure* events affecting two satellites originally intended to contribute to achievement of the M1 milestone; it was submitted in the expectation that the report for the M1 satellite deployment under Resolution **35 (Rev.WRC-23)** would lead to an unfavourable finding because of certain specific provisions of Resolution **8 (WRC-23)** (see § 13 below for a discussion of a potential contradiction between the two resolutions). In making the request, the Administration of Canada was acting as though no M1 report had been filed under Resolution **35 (Rev.WRC-23)**.

8.2 Kepler Communications Inc., the satellite operator and manufacturer, had encountered an unforeseen anomaly in the onboard propulsion system of two technical demonstration satellites known as the Pathfinder mission. The Pathfinder satellites were intended to count towards the 10 per cent constellation threshold required under the M1 obligations for a planned 20-satellite network but, as a result of the anomaly, could not be maintained at the filed altitude of 575 km. The Administration of Canada thus sought additional time to allow the satellite operator to launch 10 second-generation satellites (the T1 mission) that had been ready for launch in November 2025 but were currently scheduled for deployment in January 2026. Of those 10 satellites, at least 2 were intended to contribute to the M1 requirement.

8.3 Documents RRB25-3/5 and RRB25-3/24 contained a detailed description of the sequence of events pertaining to the propulsion anomalies and a detailed analysis of how the situation met the four conditions for *force majeure*. Should the extension request be granted, the Administration of Canada sought the Board's confirmation that the modifications required to the characteristics of the frequency assignments recorded for the MULTUS system (for a total of 20 satellites) were to be submitted within 90 days after the end of the extension period, as was typically the case for modifications under *resolves 11 c* of Resolution **35 (Rev.WRC-23)**.

8.4 The annexes to Documents RRB25-3/5 and RRB25-3/24 comprised the encapsulation certification letters, the propulsion vendor public release, the propulsion test summary, confirmation of an in-orbit anomaly, the list of satellites outside the Resolution 8 (WRC-23) tolerances, orbit data for the Pathfinder satellites, confirmation from SpaceX that the launch service agreement would be executed no earlier than 5 January 2026, and the vibration testing certificates.

8.5 In reply to a query from **Mr Henri**, he confirmed that the Administration of Canada planned to limit the MULTUS system to 20 satellites, not the 60 to 80 satellites indicated in Table 7-2 of the Director's report (Document RRB25-3/11).

8.6 In reply to a query from **Mr Azzouz**, he confirmed that the 10 satellites in the T1 mission were currently scheduled for deployment in January 2026.

8.7 **Mr Henri** said that he would find it difficult to accede to the request from the Administration of Canada given that, according to the information provided, the operator had been informed before the launch about the possibility that the two satellites would suffer a propulsion system anomaly but had nevertheless decided to go ahead with the launch and to operate both satellites for testing purposes. The event was therefore not beyond the obligator's control and was not unforeseen.

8.8 The request from the Administration of Canada raised again the issue of whether the Board should show greater flexibility in cases where a satellite had already been launched, as had been raised in other cases brought by administrations requesting extensions for bringing frequency assignments into use or back into use. It might be useful for the Working Group on the Rules of Procedure to consider the issue at some point.

8.9 **Mr Azzouz**, having summed up the facts in the case, noted that one of the two Pathfinder satellites had also suffered a single event upset. In his view, the propulsion system anomaly was unforeseeable and beyond the operator's and the administration's control. He was therefore in favour of granting the extension to 6 January 2026.

8.10 **Ms Manneppalli** pointed out that the Administration of Canada had been made aware of the *force majeure* event only once the satellite had been integrated into the launch vehicle and was ready to be launched. She therefore considered that the event met the conditions for *force majeure*, noting that the operator had endeavoured to resolve the issue by means of software updates and by minimizing propulsion so that the orbital position could be maintained. The administration had explained those efforts in detail. Moreover, the *force majeure* event had been compounded by a single event upset. The launch was currently scheduled to take place on 5 January 2026, with 24 hours required for orbit raising. She therefore agreed to the request for an extension of the M1 milestone time-limit to 6 January 2026.

8.11 **Mr Talib** said that, in view of the detailed information provided in the documents and the efforts made by the Administration of Canada since it had been informed of the risk that a propulsion anomaly could occur, in November 2023, he would agree to grant the request for an extension of the M1 milestone to 6 January 2026.

8.12 **Ms Hasanova** thanked the Administration of Canada for the detailed information provided. Given the facts in the case, she had no difficulty in joining other Board members and acceding to the request of the Canadian Administration.

8.13 **Mr Cheng** said that it was his understanding that two satellites launched on 11 November 2023 had encountered an unforeseen anomaly in the on-board propulsion system; as a result, they could not be maintained within the orbital tolerance of 575 km and therefore could not meet the M1 requirements. The case was clearly one of *force majeure* and he would be willing to grant the requested extension but considered that the Board might need more information before reaching a conclusion. That information might include evidence demonstrating that the satellite would have reached the 575 km orbit before the M1 time-limit were it not for the propulsion system anomaly; a letter from the launch service provider, SpaceX, confirming that the satellite had been launched and its orbital altitude; and a copy of the launch service

contract. He suggested that the Bureau be asked to maintain the system filings until the end of the 101<sup>st</sup> Board meeting and that the administration be asked to provide further information.

8.14 **Mr Nurshabekov** thanked the Canadian Administration for the detailed information provided, which had left him with the impression that the satellites in question were experimental. Five days before the launch, the operator had been warned of a possible propulsion anomaly. It had indicated that the warning had come too late for any design changes to the satellites and had proceeded with the launch anyway, raising the question as to whether the situation could be considered as *force majeure*. The Board would need additional information in order to reach a conclusion.

8.15 **Mr Fianko** said that since, according to the submission, the operator had been alerted before the launch, it could not be said that it had been unaware of the risk. That said, once the root cause of the problem had been detected, every effort had been made to mitigate the impact. In his view, the Canadian Administration should be given the opportunity to address the fact that it had taken a calculated risk before the Board concluded that the case qualified as one of *force majeure*.

8.16 **Mr Di Crescenzo** noted that the situation had been complicated by the Canadian Administration's perception that Resolution 35 (Rev.WRC-23) and Resolution 8 (WRC-23) conflicted.

8.17 Following informal discussions to resolve the difference of opinion on the best way forward, the **Chair** proposed that the Board should conclude as follows on the matter:

"The Board considered in detail Documents RRB25-3/5 and RRB25-3/24, in which the Administration of Canada requested an extension of the first milestone period (M1) for the MULTUS satellite system.

The Board noted the following points:

- The Administration of Canada had requested an extension, from 28 June 2025 to 31 March 2026, later updated to 6 January 2026, to the M1 milestone associated with the MULTUS satellite system.
- The Canadian satellite operator and satellite manufacturer Kepler had encountered an anomaly in the propulsion system affecting two satellites intended to contribute to the M1 (10%) milestone deployment requirement for the 20-satellite MULTUS constellation.
- The satellites could not be maintained in orbit within the orbital tolerance requirements specified in Resolution 8 (WRC-23) and, as such, could not be considered under Resolution 35 (Rev.WRC-23).
- Although the event had been foreseeable since the satellite operator had been informed of the propulsion system anomaly before the launch, it was inevitable given that it was too late to make any modifications, as the satellites had already been integrated into the launch vehicle as part of a secondary payload.
- The operator had considered different options to avoid missing the deadline, but none could launch additional satellites before the planned launch of its next mission in November 2025.

Consequently, the Board concluded that the situation qualified as a case of *force majeure* and decided to accede to the request from the Administration of Canada by extending the regulatory time-limit to the M1 milestone for the MULTUS satellite constellation to 6 January 2026."

8.18 It was so **agreed**.

8.19 In reply to the Canadian Administration's request for confirmation that the modifications required to the characteristics of the frequency assignments recorded for the MULTUS system (for a total of 20 satellites) were to be submitted within 90 days after the end of the extension period, as was typically the case for modifications under *resolves 11 c* of Resolution 35 (Rev.WRC-23), **Mr Vallet (Chief, SSD)** said that when the Board extended a regulatory time-limit it was extending that specific time-limit; it would have to state explicitly if its intention was to extend other regulatory time-limits as a consequence of that decision, otherwise the Bureau would consider that such had not been its intention. That said, if the Board decided to extend a time-limit which completion has to be reported within 30 days from the date of the time-limit, that 30-day period would apply as of the new time-limit. It was his understanding that the Administration of Canada should submit the filing modifications within the time-frame stipulated in Resolution 35

(Rev.WRC-23) but counted from the date of the milestone as extended by the Board. In his view, that would not move the time-limits for subsequent milestones absent a specific Board decision to that effect.

8.20 **Mr Henri** said that it was also his understanding that the extension granted in the current case had no bearing on subsequent milestone time-limits under Resolution 35 (Rev.WRC-23), in the same way that a Board decision to extend the time-limit for bringing into use a frequency assignment had no impact on an administration's obligation to provide the notification under Resolution 49 (Rev.WRC-23) within the regulatory time-limit.

8.21 **Ms Beaumier**, addressing an issue of general concern that was not specifically related to the request from the Administration of Canada, pointed out that the request was the first in which an administration had sought an extension for a milestone time-limit after having encountered difficulties in meeting the deployment requirements under Resolution 35 (Rev.WRC-23). While no Board member had questioned whether the Board had authority to decide such cases, the Board should bring the matter to the attention of WRC-27 in its report under Resolution 80 (Rev.WRC-07) and state that it believed that the authority it had been granted by past conferences to consider requests for extensions to the regulatory time-limits for bringing frequency assignments into use or back into use also applied in such new situations.

8.22 The **Chair** and **Mr Di Crescenzo** agreed that the request from the Administration of Canada was a good example of an item to include in the Board's report under Resolution 80 (Rev.WRC-07).

## 9 Submission by the Administration of Nigeria requesting to retain the frequency assignments to the NIGCOMSAT-2D satellite network (Documents [RRB25-3/31](#) and [RRB25-3/DELAYED/5](#))

9.1 **Mr Ciccorossi (Head, SSD/SSS)**, introducing the item, said he recalled that, at its 98<sup>th</sup> and 99<sup>th</sup> meetings, the Board had considered requests from the Administration of Nigeria for an extension of the regulatory time-limit to bring into use the frequency assignments to the NIGCOMSAT-2D (at 9.5°W) and NIGCOMSAT-2B (at 16°W) satellite networks (see Document RRB25-1/28, § 5.1) and for the Bureau to be instructed to retain those frequency assignments until the end of WRC-27 (see Document RRB25-2/21, § 6.6). The Board had concluded that it was not in a position to accede to those requests.

9.2 In Document RRB25-3/31, the Administration of Nigeria appealed the Board's decision. Noting that the Board had cited a lack of supporting information, the administration provided details of the project, explaining, among other things, that it was part of the country's national space programme and was intended to expand coverage, capacity and redundancy in Nigeria and across Africa, demonstrating the administration's long-term commitment to satellite development in Africa. The benefits of the project for Nigeria included digital inclusion, support for e-learning, e-health and e-governance, and strengthened regional cooperation. Efforts to implement the project and meet the regulatory time-limit included the following: coordination with neighbouring satellite networks, in accordance with Articles 9 and 11; budgetary and institutional support provided by the Government; and the conclusion of the bidding process, with four vendors in the running for selection. The administration requested the Board to consider the special needs of Nigeria as a developing country by allowing it to submit a request for an extension of the regulatory time-limit to WRC-27 and instructing the Bureau to maintain the frequency assignments until the end of WRC-27.

9.3 In Document RRB25-3/DELAYED/5, the administration provided additional information on the status of coordination with adjacent satellite networks and copies of news articles on plans to replace the NIGCOMSAT-1R satellite network. In response to questions from **Mr Azzouz** and **Ms Hasanova**, he clarified that the Bureau had not yet cancelled the frequency assignments and that no update had been received on the status of the administration's technical and financial evaluation phase of the project, expected to have been concluded on 7 October 2025.

9.4 **Mr Azzouz** said that he recognized the concerted efforts of the Administration of Nigeria to implement and launch the satellite project within the regulatory time-limit. Those actions included the signing of a lease agreement for the use of the AsiaSat-4 satellite network at the 9.5°W orbital position to

bring into use the NIGCOMSAT-2D frequency assignments, and coordination with neighbouring satellite networks. The administration's enduring commitment to advancing African satellite infrastructure was borne out by its announcement of plans to launch two additional satellites. In the light of the administration's endeavours and the ongoing discussions in relation to situations in which developing countries might be granted regulatory time-limit extensions, he was inclined to suggest that the Board might reconsider its decision and instruct the Bureau to maintain the satellite network filings until the end of WRC-27. The Administration might also be invited to provide updated information periodically on the progress of the project. The Board should include the issue of the criteria and conditions under which it could grant extensions of regulatory time-limits to developing country administrations in its report to WRC-27 under Resolution 80 (Rev.WRC-07). It should also work with the Bureau to provide guidance for discussion of the matter at WRC-27, just as it had done in respect of Resolution 559 (WRC-19).

9.5 **Mr Fianko** said that, in its appeal, the Administration of Nigeria did not contest the basis on which the Board had made its decision, instead providing the information that had previously been lacking. He noted that, since the Board's 99<sup>th</sup> meeting, the administration had made alternative arrangements to bring into use the frequency assignments and that it asked for those assignments to be retained until the end of WRC-27 on the basis that Nigeria was a developing country facing specific challenges. While those were legitimate elements, WRC-23 had not clarified any criteria or conditions under which the Board could grant extensions to developing countries. In view of the efforts that the administration had made to realize the project, however, he was minded to support the filings being maintained until the end of WRC-27.

9.6 **Mr Henri, Ms Hasanova, Mr Cheng** and the **Chair** all expressed sympathy for the difficulties faced by the Administration of Nigeria and acknowledged the efforts it had made to advance the satellite project.

9.7 **Mr Fianko** and **Mr Cheng** emphasized that the Board could grant limited and qualified extensions in two specific circumstances – on the grounds of co-passenger delay or *force majeure* – and that the administration had made the case for neither.

9.8 **Mr Henri** said that, notwithstanding the new information provided, there were no regulatory grounds related to the condition of *force majeure* on which the Board could accede to the request. He could not support a decision to instruct the Bureau to retain the frequency assignments of the satellite network until the end of WRC-27. The administration always had the possibility to resubmit the network filings at any time; if it wished for the case to be considered at WRC-27, provision was made therefor under No. 14.6.

9.9 **Ms Beaumier, Ms Hasanova** and **Mr Cheng** agreed with that assessment.

9.10 **Ms Beaumier** added that, while the information provided was interesting, the new developments, including the efforts to bring into use the frequency assignments, had all occurred after the Board's decision at the 99<sup>th</sup> meeting. The Board could not revisit its decisions on that basis. It would in, fact, send the wrong message to accede to the request. The best strategy would be for the administration to submit new network filings rather than rely on ones that had already expired.

9.11 The **Chair** agreed that the Board had no mandate to grant such a request and that there were no grounds to maintain the filing until WRC-27. He proposed that the Board conclude on the matter as follows:

"The Board carefully considered Document RRB25-3/31, in which the Administration of Nigeria sought reconsideration of the decision of the 99<sup>th</sup> Board meeting concerning the request to retain the frequency assignments to the NIGCOMSAT-2D satellite network at 9.5°W until the end of WRC-27. The Board also noted Document RRB25-3/DELAYED/5 from the Administration of Nigeria for information.

The Board noted the following points:

- The regulatory time-limit for bringing into use the frequency assignments to the NIGCOMSAT-2D satellite network at 9.5°W was 6 December 2024.
- The Administration of Nigeria had provided information on recent developments and efforts made to bring into use the frequency assignments to the NIGCOMSAT-2D satellite network since the previous Board meeting.
- The Board could not revisit past decisions that were unfavourable based on efforts made by an administration after the fact.

Consequently, the Board reiterated its decision from the 99<sup>th</sup> meeting that there were no grounds to instruct the Bureau to retain the frequency assignments to the NIGCOMSAT-2D satellite network.”

9.12 It was so **agreed**.

## 10 Cases of harmful interference

### 10.1 Issues regarding harmful interference to emissions of high frequency broadcasting stations published in accordance with RR Article 12

**Submission by the Administration of the United Kingdom of Great Britain and Northern Ireland regarding harmful interference to emissions of its high frequency broadcasting stations published in accordance with RR Article 12 (Documents [RRB25-3/3](#), [RRB25-3/4](#) and [RRB25-3/10](#))**

**Submission by the Administration of China (People's Republic of) in response to the submissions by the United Kingdom of Great Britain and Northern Ireland regarding harmful interference to emissions of its high frequency broadcasting stations published in accordance with RR Article 12 (Documents [RRB25-3/8](#), [RRB25-3/28](#) and [RRB25-3/DELAYED/1](#))**

10.1.1 **Mr Ba (Head, TSD/TPR)**, introducing the item, said that the Board had previously considered the long-standing issue of harmful interference to emissions of high frequency broadcasting stations of the United Kingdom. At its 91<sup>st</sup> meeting, the Board had concluded that stations within the territory of the Administration of China had produced unnecessary transmissions causing interference to British Broadcasting Corporation (BBC) emissions (see Document RRB22-3/18, § 6.1.20).

10.1.2 In Document RRB25-3/3, the Administration of the United Kingdom explained that, following the Board's decision, it had paused its reporting of harmful interference in order to facilitate bilateral discussions, noting a temporary reduction of interference and the willingness expressed by the Administration of China to resolve the issue. Evidence of persistent and ongoing harmful interference had, however, led it to seek recourse to the Board: it was requesting that the Bureau conduct an international monitoring campaign, pursuant to No. **15.44**, to independently monitor and record the ongoing interference, with a view to resolving the matter. Document RRB25-3/4 contained an Appendix 9 infringement report concerning BBC World Service broadcasts emitted from the transmitting station in Oman to CIRAF zone 41NE on the 15 295 kHz frequency, with interference being reported at the receiving stations in Bangalore, Kolkata and Kathmandu. The Administration of the United Kingdom suggested that such interference was in contravention of No. **15.1** and No. 197 of the ITU Constitution and Convention.

10.1.3 In Document RRB25-3/8, the Administration of China, emphasizing its continued willingness to cooperate bilaterally, explained the measures it had taken to address the interference issue since 2022. Those measures included monitoring and detection activities to locate the sources of interference to the BBC broadcasting frequency, which, it had concluded, did not originate from within its territory. It had received two interference complaints from the Administration of the United Kingdom since September 2024. In response, it had conducted detailed investigations of the indicated location but had found no evidence of harmful interference, detecting only the English-language emission sources, which, it said, were being broadcast from Oman and Pakistan.

10.1.4 In Document RRB25-3/10, the Administration of the United Kingdom provided further information, clarifying that coordination of high frequency broadcasting assignments and timeslots had been discussed at High Frequency Coordination Conferences and that no conflicts or disagreements regarding Article **12** seasonal planning had been found. Responding to the information provided by the Administration of China, it suggested that direction-finding, or radiogoniometry, errors had mistakenly located the BBC transmission signals as being broadcast from Oman and Pakistan, when there was only one legitimate Article **12**-published station, in Oman, which it believed was the subject of targeted monitoring.

10.1.5 Documents RRB25-3/28 and RRB25-3/DELAYED/1 contained the responses of the Administration of China. The Administration reiterated the efforts it had made to locate the interference sources, detecting only the emission sources; asserted that the claims of “targeted monitoring” and interference coming from its territory were unfounded; emphasized that no interference had been identified on the cited frequency, which differed to those frequencies that had been the subject of the international monitoring campaign in 2021; and objected to the allegation that it had breached Article 15. It submitted the results of its monitoring of the 15 295 kHz frequency, from 10 September to 8 October 2025, according to which no signals had been detected on that frequency other than the BBC English-language broadcasts. The administration concluded by restating its willingness to collaborate with the Administration of the United Kingdom to find a common solution, in accordance with Articles 12 and 15.

10.1.6 Following questions from **Mr Talib**, **Ms Mannepalli**, **Mr Azzouz** and **Ms Beaumier**, he explained that the Bureau did not itself carry out international monitoring campaigns. Instead, it sought the cooperation of administrations able to help in identifying the source of harmful interference, which was exactly what it had done previously, in 2021, at the Board’s request. In its decision at the 91<sup>st</sup> meeting, the Board had considered that sufficient information from the international monitoring campaign had been collected to confirm the existence of interference originating from within the territory of the Administration of China; as a result, no further campaign had been ordered. The subject of the current complaint was interference to the 15 295 kHz frequency; in the previous interference complaint, 15 frequencies had been affected, none of them the 15 295 kHz frequency. For that reason, the Administration of China argued that the conclusions of the 2021 international monitoring campaign could not be applied to the current case. According to information available to the Bureau, the reference by the Administration of China to an emission source in Pakistan seemed to be a radiogoniometry error; the administration had acknowledged that possibility in Document RRB25-3/28. Lastly, he clarified that broadcasting frequencies changed every six months on the basis of seasonal broadcasting schedules – with coordination carried out at High Frequency Coordination Conferences – so as to facilitate as broad and efficient use as possible of spectrum resources.

10.1.7 **Mr Azzouz**, **Ms Mannepalli**, **Ms Beaumier** and **Mr Talib** welcomed the commitment of the two administrations to engage in monitoring activities and cooperate constructively to resolve the long-standing interference issue.

10.1.8 **Mr Azzouz**, summarizing the technical aspects of the case, said it was worth considering that any number of technical causes, including the propagation characteristics associated with the broadcasting signals, might account for the interference reported. The Board should encourage the administrations to continue their cooperation and collaboration efforts on the basis of goodwill and mutual cooperation to resolve the long-standing harmful interference issue. To that end, the administrations could be invited to exchange the latest technical and administrative information; and the Administration of China could be requested to take all possible action to measure, investigate and, if found, stop any source of interference on its territory, with support from the Bureau. He was minded to accede to the request of the Administration of the United Kingdom to instruct the Bureau to conduct a new international monitoring campaign, since the results thereof might shed more light on the situation.

10.1.9 **Mr Talib** said that, since the case involved reported interference to frequencies not previously affected, he was of the view that the Board should instruct the Bureau to gather relevant information on the interference, organize an international monitoring campaign and invite the two administrations to meet in a bilateral setting, facilitated by the Bureau, to find a solution.

10.1.10 **Ms Mannepalli** said that the monitoring carried out by the Administration of China seemed to have detected the actual BBC transmitting stations in Oman and, albeit erroneously, Pakistan, rather than finding the sources of interference. Since the case was a new interference complaint – not an extension of the previous case – and the Administration of China had shown willingness to cooperate, there was scope for the administrations to continue working together to locate the interference and find a solution; that approach should be tried before resorting to an international monitoring campaign.

10.1.11 **Ms Beaumier** said that the case presented a clear dilemma: on the one hand, the Administration of the United Kingdom believed that, according to its analysis and monitoring, broadcasts on the 15 295 kHz frequency were experiencing interference, the source of which, it said, was in China; the Administration of China, having conducted its own monitoring and investigation of the complaint, had found no such

interference. She wondered whether the best way to resolve the issue might be to have the Bureau, as an independent third party, conduct an international monitoring campaign.

10.1.12 Subsequently, **Mr Vassiliev (Chief, TSD)** explained that international monitoring of high frequency broadcasting bands was a time-consuming and resource-heavy task for all involved. The monitoring stations required were already fully occupied in monitoring high frequency and other bands, including in relation to safety-of-life, maritime and aeronautical transmissions. At least three-four monitoring stations located in different parts of the world would be needed to achieve the triangulation required. He drew attention to Addendum 10 to the Director's report to the 87<sup>th</sup> Board meeting (Document RRB21-2/3(Rev.1)), in which the Bureau had reported on the outcome of the international monitoring campaign conducted in response to the previous case involving the two administrations. In that case, which had concerned interference to 15 frequencies, the Bureau had requested the assistance of 10 administrations, only 4 of which had agreed to participate, performing monitoring at synchronized timeslots in their different time zones over a four-week period. Of the 15 frequencies monitored during the campaign, at 2 frequencies no interference was detected. On one of the 15 frequencies the source of interference had been detected had been detected in a country different from other cases. Since the current case concerned just one frequency, the chances of finding interference might be reduced. In the previous case, the Board had analysed the situation over several meetings; detailed information on the interference had been provided, including audio samples, and the Administration of the United Kingdom had obtained informal measurements from two other administrations to support its case. The Board had subsequently concluded that an international monitoring campaign was necessary. In the current case, bilateral cooperation, with the support of the Bureau, might be the appropriate first step.

10.1.13 Following a question from the **Chair**, the **Director** added that the Board's first recourse in the previous case had been to call for the two administrations to hold bilateral meetings, facilitated by the Bureau. For various reasons, that approach had been rejected and the situation had further deteriorated, ultimately leading to the Board's request for the international monitoring campaign to be carried out. Currently, there seemed to be readiness on both sides to cooperate. He pointed out that international monitoring campaigns relied upon the goodwill of administrations to help in identifying the source of harmful interference; such requests should be kept to a minimum and made only when strictly necessary.

10.1.14 **Mr Azzouz** and **Ms Mannepalli** agreed with that approach: the administrations should be encouraged to continue their cooperation, including through bilateral meetings, exchange the necessary information and find a mutually acceptable solution. The Board could consider any next steps, which might include international monitoring, if the outcomes of other efforts had not been satisfactory.

10.1.15 **Ms Beaumier**, welcoming the Bureau's input, said that she sympathized with the plight of the Administration of the United Kingdom, given the long and drawn-out history of the case. The interference was not seasonal; rather, the frequencies changed in accordance with the semi-annual seasonal planning. As a result, there were temporary reductions of interference before it restarted. While the Administration of the United Kingdom had paused its reporting of harmful interference to facilitate bilateral discussions, there was no indication that the two administrations had held recent meetings nor that past meetings had produced any results. She had no objection to the Board taking a measured, step-by-step approach, by first encouraging bilateral cooperation, given that the Administration of China had indicated its willingness to cooperate. At the same time, she recalled similar messaging back in 2021. In that case, results had only been achieved after the international monitoring campaign and the obtention of audio samples, which proved that the interference transmissions were in contravention of No. 15.1. She agreed that the Bureau should organize a meeting between the two parties; one frequency was currently affected, but that could just be the start.

10.1.16 The **Chair** proposed that the Board conclude on the matter as follows:

"The Board considered the submissions from the Administration of the United Kingdom of Great Britain and Northern Ireland as contained in Documents RRB25-3/3, RRB25-3/4, RRB25-3/10 and the Administration of China as contained in Documents RRB25-3/8, RRB25-3/28. The Board also noted Document RRB25-3/DELAYED/1 from the Administration of China for information.

The Board noted the following points:

- After a temporary reduction of the harmful interference, the Administration of the United Kingdom had experienced persistent and ongoing evidence of harmful interference to its HF broadcasting stations.
- The harmful interference transmissions affected a single frequency assignment and had different characteristics than in past cases identified by the 2021 international monitoring campaign.
- The Administration of China had investigated but had not identified any source of harmful interference to the HF broadcasting station within its territory.
- The Administration of China had expressed its willingness to cooperate and continue discussing the case of harmful interference.

The Board concluded that it was premature to consider launching an international monitoring campaign.

The Board urged the Administrations of the United Kingdom and China to continue their efforts with utmost good will and mutual cooperation to resolve the long-standing harmful interference problem.

The Board instructed the Bureau to:

- invite the administrations concerned to exchange the necessary technical and administrative information to support the resolution of the harmful interference cases;
- Continue to provide support to the administrations concerned and, if necessary, to convene a bilateral meeting on the harmful interference problem;
- report on progress to the 101<sup>st</sup> Board meeting.”

10.1.17 It was so **agreed**.

## **10.2 Submission by the Administration of the Russian Federation regarding harmful interference to its satellite networks (Documents [RRB25-3/26](#) and [RRB25-3/DELAYED/4](#))**

10.2.1 **Mr Vallet (Chief, SSD)** introduced Document RRB25-3/26, in which the Administration of the Russian Federation reported on cases of harmful interference occurring since March 2022 in the frequency bands of the YAMAL-601 (49°E), YAMAL-402 (55°E) and YAMAL-401 (90°E) satellites and affecting the transmission of television and communication channels of governmental and civilian users in the FSS. In several instances, the harmful interference had led to the complete interruption of the transmission of public digital broadcasting packages or spoofing of programme content. According to satellite monitoring systems in the Russian Federation, the harmful interference had been deliberately generated from the territory of Ukraine. The Administration of the Russian Federation asked the Bureau to report on the harmful interference to the Board, in application of Article 15, and to inform the administration of the results of the Bureau’s work on the matter.

10.2.2 In the annex to Document RRB25-3/26, the Administration of the Russian Federation provided seven examples of deliberate harmful interference against the three Yamal satellites between 18 January 2023 and 25 February 2025, with images of spectrum plots and geolocation results.

10.2.3 In Document RRB25-3/DELAYED/4, the Administration of Ukraine, citing Article 15 of the Radio Regulations, indicated that the reports of harmful interference cases from the Administration of the Russian Federation did not contain the data required under item *j* of Appendix 10 and were therefore insufficient to identify the frequency assignments that might be affected. In addition, most of the reports appeared to be outdated and might no longer be relevant.

10.2.4 In response to a question from **Ms Mannepalli**, he added that the cases of harmful interference about which the Bureau had been informed were in the C and Ku bands only.

10.2.5 In reply to a question from **Ms Beaumier**, he said that the introduction to each case of harmful interference described in the annex to Document RRB25-3/26 contained a brief description of the nature of the interference (e.g. scanning emission, intermittent pulsed signal emissions).

10.2.6 **Mr Azzouz** pointed out that the delayed document from the Administration of Ukraine indicated a list of references, and he asked the Bureau to make all such references available to Board members, especially correspondence between the administration and the Bureau.

10.2.7 After summing up the facts alleged by the Administration of the Russian Federation and the assertions of the Administration of Ukraine, he concluded that the Board should urge the administrations concerned to work with the utmost goodwill and in a spirit of mutual cooperation to resolve the cases of harmful interference. It should encourage the Administration of the Russian Federation to provide the most recent information on current cases of harmful interference to the Bureau and to the Ukrainian Administration. It should request the Administration of Ukraine to take all possible measures to identify and immediately stop any source of interference existing on its territory. Lastly, it should instruct the Bureau to convene a bilateral coordination meeting with both administrators to resolve any interference issues and to report on progress to the 101<sup>st</sup> Board meeting.

10.2.8 **Mr Talib**, noting that the Administration of Ukraine had argued that the seven examples of harmful interference described in the annex to Document RRB25-3/26 were not new and had in some instances been resolved, commended the administration for its willingness to cooperate and conduct the requisite investigations. The Bureau should be asked to collect updated information on the cases of harmful interference, to organize one or several bilateral meetings between the two administrations with a view to resolving the issue and to report on progress to the 101<sup>st</sup> Board meeting.

10.2.9 In reply to a comment from the **Chair** on the advisability of having the Bureau organize bilateral meetings before steps had been taken to verify that the harmful interference continued to occur and to obtain the requisite Appendix 10 information, **Mr Azzouz** said that the important thing was to ensure that everything was done through the Bureau.

10.2.10 **Mr Vallet (Chief, SSD)** cautioned that the Board's decision should be mindful of the current geopolitical situation between the two countries. It might be more judicious to start by requesting the Bureau to ask the administrations to provide certain information and to exchange that information before convening a formal meeting.

10.2.11 In reply to a question from **Ms Beaumier**, he added that the annex to Document RRB25-3/26 bore out the Ukrainian Administration's argument that there were discrepancies in the dates on which the harmful interference had occurred. For example, according to the title of § 7 of the annex, the harmful interference had occurred on 18 September 2024 but the geolocation results depicted in Figure 7.2 indicated a sampling date of 24 January 2023.

10.2.12 With regard to the Ukrainian Administration's argument that the Administration of the Russian Federation had failed to comply with Appendix 10, he pointed out that ITU had long recognized that Appendix 10 had been developed with terrestrial services in mind and that it was problematic to report harmful interference to satellite services in strict compliance with the format indicated in Appendix 10, which was therefore generally not used for that purpose. Working Party 1C had consequently issued Report ITU-R SM.2181 and Recommendation ITU-R SM.2149-0, on the information to provide when reporting such cases, and the ITU Satellite Interference Reporting and Resolution System (SIRRS) had been designed to allow administrations to submit items of information that were truly relevant. That said, the Ukrainian Administration was correct to argue that, where it needed to know the frequency assignments interfered with, the submission from the Administration of the Russian Federation indicated only commercial satellite names. That was a point that the Bureau could ask the Administration of the Russian Federation to clarify.

10.2.13 **Ms Mannepalli**, noting that all the examples but one given by the Administration of the Russian Federation were over a year old, with no indication of the frequency assignment or network concerned, said that the Bureau should ask the administration to provide the latest information on the harmful interference, if it persisted, with the most relevant details, such as networks and frequency assignments. Further action could be decided on after that information had been obtained.

10.2.14 **Mr Fianko** recalled that the Administration of the Russian Federation had first alleged harmful interference against the satellites in question at the Board's 96<sup>th</sup> meeting and that the Bureau had informed

the Board at that time that it – the Bureau – had received no reports on such cases. He suggested that the administration might have submitted Document RRB25-3/26 so as to bring those cases to the Board's attention. The Board should ask the Bureau to invite the administration to confirm that the harmful interference persisted, in which case the administration should provide more specific data in respect of the frequency assignments concerned. The Board could then consider the matter further.

10.2.15 **Ms Beaumier** agreed with the course of action proposed by Ms Manepalli and Mr Fianko. The Board's decision should also refer to the need for administrations to comply with Article 15.1, as there was some evidence of transmissions that were not in compliance.

10.2.16 **Mr Azzouz**, noting that the Yamal satellites had different orbital positions, said that they could not all be subject to interference simultaneously unless the source of the interference was distributed over a very large area. That was one more reason why it was important to have specific and recent information on each satellite.

10.2.17 **Mr Cheng** said that, given that all the examples provided by the Administration of the Russian Federation had occurred sometime ago, it was his understanding that the satellites of the Russian Federation were not currently subject to interference. He noted that the Administration of the Russian Federation had first mentioned its cases of harmful interference during the Board's discussion of the harmful interference by that administration to French and Swedish satellites and wondered whether the cases might not be connected and whether the Administration of the Russian Federation had submitted Document RRB 25-3/26 in response to the Board's discussion of those cases at its 96<sup>th</sup> meeting. He also wondered whether the webpage developed by the Bureau in response to the request from the Administrations of France and Sweden to apply *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022) of the Plenipotentiary Conference should not also refer to the Russian cases of harmful interference.

10.2.18 The **Chair** said that, so far as he could recall, the Administration of the Russian Federation had made no request of the Board pursuant to *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022) and that the Board could take action pursuant to that provision only at the request of a Member State.

10.2.19 The **Chair** proposed that the Board should conclude as follows on the matter:

"The Board considered in detail Document RRB25-3/26 from the Administration of the Russian Federation regarding harmful interference to its satellite networks and also noted Document RRB25-3/DELAYED/4 from the Administration of Ukraine for information.

The Board noted the following points:

- The Administration of the Russian Federation had reported cases of harmful interference, observed since March 2022, in the frequency bands of the Yamal-601 (49°E), Yamal-402 (55°E) and Yamal-401 (90°E) satellites and affecting the transmission of television channels and communication channels of governmental and civilian users in the fixed satellite service.
- According to satellite monitoring systems in the Russian Federation, the harmful interference had been deliberately generated from the territory of Ukraine.
- The Administration of Ukraine had indicated that the descriptions of harmful interference cases reported by the Administration of the Russian Federation were insufficient to identify the frequency assignments that might be affected.
- The Administration of Ukraine had also indicated that most of the reports appeared to be outdated and might no longer be relevant.

The Board stressed that all Members States had to respect their obligations and the rights of other Member States, in accordance with ITU instruments.

The Board instructed the Bureau to:

- invite the Administration of the Russian Federation to verify whether the reported cases had been resolved and provide the latest reports of harmful interference cases, including the frequency assignments and satellites affected;

- invite the Administration of Ukraine to investigate and take appropriate action to resolve the reported cases of harmful interference, in case of their continuation;
- support the efforts of both administrations to solve the cases of harmful interference and to prevent their reoccurrence;
- report on progress to the 101<sup>st</sup> Board meeting.”

10.2.20 It was so **agreed**.

**11 Submission by the Administration of the Dominican Republic on the situation in the FM sound broadcasting band on the border between the Dominican Republic and the Republic of Haiti (Document [RRB25-3/7](#))**

11.1 **Mr Vassiliev (Chief, TSD)** introduced Document RRB25-3/7, in which the Administration of the Dominican Republic provided background information on cases of interference affecting the FM sound broadcasting band in areas on the border between the Dominican Republic and Haiti. It also outlined aspects of cooperation and coordination between the two administrations, since 2001, including the signing of various bilateral agreements between the administrations' respective regulators and the holding of coordination meetings and roundtables. Notwithstanding all the measures that had been taken, the issue had not been resolved. Instead, there had been a substantial increase in the number of Haitian FM stations broadcasting in the border area, prompting complaints from Dominican residents. A technical survey on the coverage of Dominican and Haitian stations along the border had revealed that there were more Haitian (158) than Dominican (142) stations and that 21 Dominican FM stations licensed to operate in the area were affected by Haitian transmissions.

11.2 He added that, owing to the political instability in Haiti, many areas, including those along the border, were outside the control of the central government of that country. Moreover, a part of country's radio and television stations were unlicensed. The Administration of the Dominican Republic had made no specific request to the Board: the document was for information only. The Bureau had exchanged correspondence and held two in-person meetings with the administration. It had recommended that the administration take steps to record its stations in the MIFR, so as to obtain international recognition, and submit interference reports. The administration, at the current time, had declined the Bureau's offer to provide technical assistance or organize a bilateral meeting.

11.3 In response to questions from **Mr Fianko** and the **Chair**, he clarified that the Administration of the Dominican Republic did not currently have frequency assignments for broadcasting stations recorded in the MIFR. Explaining how priority was accorded in respect of primary and secondary allocations using the same frequency bands in the MIFR, he said that when one administration recorded a station with full rights, thus obtaining international recognition, the other administration shall take it into account when making their own assignments, to avoid harmful interference. However, the Radio Regulations did not outline any specific measures that should be taken if this obligation is not met. Recording stations in the MIFR had other advantages, which included facilitating coordination among countries.

11.4 **Mr Fianko** said that the issue seemed to be one of national policy and equitable access, rather than of interference. The Administration of the Dominican Republic had not specified the frequencies affected by the interference, had no frequency assignments recorded in the MIFR, meaning that they could not claim protection, and had not shared the special agreements concluded between it and the Administration of Haiti, as required under Article 6.

11.5 **Mr Azzouz**, noting that there were only around 3 per cent more Haitian stations than Dominican stations broadcasting in the border area, said that the submission provided an opportunity for the Bureau to draw attention to the benefits of recording frequency assignments for broadcasting stations in the MIFR.

11.6 The **Chair** observed that it would be challenging to record all 300 FM channels operating along the border between the two countries.

11.7 **Ms Hasanova** emphasized that the decision as to whether to record frequency assignments for broadcasting stations in the MIFR lay with the administrations concerned. That said, in the absence of any such record, the Dominican stations had no priority and thus could not benefit from international recognition.

11.8 **Ms Beaumier, Mr Azzouz** and **Mr Nurshabekov** noted that the submission from the Administration of the Dominican Republic seemed to be an internal document and suggested that, since no specific request had been made, the Board could, in its decision, simply take note of the information provided.

11.9 The **Chair** said that the Board could provide some guidance to the Administration of the Dominican Republic or offer some assistance, if desired, with a view to addressing the issue of interference. **Mr Azzouz, Mr Fianko, Mr Nurshabekov** and **Mr Cheng** agreed with that approach. **Ms Beaumier** and **Mr Azzouz** said that the Board might also point to the benefits of recording frequency assignments in the MIFR.

11.10 The **Chair** proposed that the Board should conclude on the matter as follows:

“The Board considered the submission from the Administration of the Dominican Republic concerning the situation in the FM sound broadcasting band on the border with Haiti, as presented in Document RRB25-3/7.

The Board noted the following points:

- The submission of the Dominican Republic did not request any action from the Board but rather contained information about the interference situation and the deployment of FM broadcasting stations in the border area of both countries.
- Between May and October 2025, the Bureau had exchanged correspondence with the Administration of the Dominican Republic on the interference issue and had two in-person meetings with its representatives, offering assistance. However, such assistance was not required at the moment.
- Only frequency assignments that were duly recorded in the Master International Frequency Register were entitled to international recognition.

The Board instructed the Bureau to:

- invite the Administration of the Dominican Republic to consider the possibility of recording its FM stations in the Master International Frequency Register, to obtain the status of international recognition and to submit reports of harmful interference.
- again offer technical or administrative assistance to the Administration of the Dominican Republic, with a view to mitigating the interference situation.”

11.11 It was so **agreed**.

## 12 Issues regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran

**Submission by the Administration of the Islamic Republic of Iran regarding the provision of Starlink satellite services in its territory (Document [RRB25-3/22](#))**

**Submission by the Administration of Norway regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran (Document [RRB25-3/29](#))**

**Submission by the Administration of the United States regarding the provision of Starlink satellite services in the territory of the Islamic Republic of Iran (Documents [RRB25-3/32](#) and [RRB25-3/DELAYED/6](#))**

12.1 **Mr Vallet (Chief, SSD)**, introducing the item, said that, in Document RRB25-3/22, the Administration of the Islamic Republic of Iran provided information, as requested by the Board at its 99<sup>th</sup> meeting, on the steps it had taken to identify and deactivate unauthorized Starlink terminals operating in its territory. It reiterated the issues it faced in that regard, including the small size and portability of terminals and the country's challenging geography. The administration pointed to measurements proving that Starlink services remained operational and accessible within its territory. It restated arguments that it had previously

submitted to the Board and requested that: the operator immediately deny access to Starlink services by unauthorized terminals; the Board condemn the notifying administration for failure to meet obligations and to implement the Board's decisions; and the Board publish information on the case in accordance with *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022) of the Plenipotentiary Conference. In Attachment 2, the administration listed the Board's decisions on the matter since the 94<sup>th</sup> meeting and sought clarification on the regulatory situation of the "associated administration".

12.2 In Document RRB25-3/29, the Administration of Norway explained that enforcement against a licensee operating under a satellite filing was limited to clearly stipulated regulatory provisions. It deemed that Resolution 22 (Rev.WRC-23) contained no provision requiring the notifying administration to force Starlink to disable all terminals in a specific area. In its view, the issue of whether Starlink had taken such action at the request of other administrations was beyond the scope of the Board's discussions; that assertion, he said, seemed to be a tacit admission that Starlink did have the technical capability to do so. The crux of the matter was thus that the notifying administration did not believe there was any legal obligation requiring it to compel Starlink to take such a step. The administration contended that references to inputs by other satellite operators to Working Party 4A were irrelevant, since they related to discussions under agenda item 1.5 of WRC-27, not to Resolution 22 (Rev.WRC-23); and that the Board's mandate did not extend to interpreting the intentions of WRC-19 in adopting that resolution or implying requirements that were not explicitly stated therein. It had met its obligations and urged the Board to exercise caution with regard to publication of a webpage, in accordance with *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022), given the difference of opinion regarding the interpretation of Resolution 22 (Rev.WRC-23).

12.3 In Document RRB25-3/32, the Administration of the United States referred to previous submissions in which it had responded to the Board's questions and asserted that it had met its obligations under Article 18 and Resolutions 22 (Rev.WRC-23) and 25 (Rev.WRC-23). Lastly, it emphasized its long-standing support for the ITU mission to connect the unconnected and advance the free flow of information, a mission, it said, that the Iranian Administration regularly failed to respect.

12.4 In Document RRB25-3/DELAYED/6, the Administration of the Islamic Republic of Iran responded to the submission by the Administration of the United States, disputing that the latter had met its commitments, since the operation of unauthorized Starlink terminals continued unabated, and objecting to the claim that the Administration of the Islamic Republic of Iran did not support the ITU mission. It appended a news article, dated 24 October 2025, in which it was stated that SpaceX had "proactively identified and disabled" thousands of Starlink devices being used by so-called scam centres. Lastly, it emphasized that the obligations with regard to the satellite network operator were the sole responsibility of the notifying administration.

12.5 **Mr Vallet** concluded his presentation by saying that the core of the issue seemed to be the wording of *resolves 2 and 3 of Resolution 22 (Rev.WRC-23)*, particularly the reference to "unauthorized earth station transmissions". The Administrations of Norway and the United States had previously indicated that they deactivated any such earth stations brought to their attention, in accordance with those provisions. In their view, however, Resolution 22 (Rev.WRC-23) contained no obligation to pre-emptively or proactively request a satellite operator to shut down the entire service, which was what the Administration of the Islamic Republic of Iran was requesting.

12.6 Following a question from **Mr Azzouz**, he clarified that the Administrations of Norway and the United States considered that it was the Iranian Administration's responsibility to identify and report to them the individual earth stations being used illegally in Iranian territory, whereas the Administration of the Islamic Republic of Iran considered that approach to be an impossible task, calling instead for the deactivation of all unauthorized terminals in its territory. What was in dispute was no longer whether it was technically feasible for Starlink to disable all unauthorized terminals in a specific area, but rather whether there was a legal requirement for the notifying administration to force Starlink do so, be it under Article 18 or Resolutions 22 (Rev.WRC-23) or 25 (Rev.WRC-23).

12.7 **Mr Cheng** said that the Administration of the Islamic Republic of Iran had continued to make every effort to identify unauthorized terminals operating in its territory, notwithstanding the technical challenges

it faced in that endeavour. The Board had given a clear explanation of Resolutions **22 (Rev.WRC-23)** and **25 (Rev.WRC-23)** and Article **18**. It had also noted that compliance with *resolves* 2 and 3 ii) of Resolution **22 (Rev.WRC-23)** might involve geolocating and deactivating terminals remotely, if those capabilities were available to the satellite system operator; it was now clear that the satellite operator did indeed have that capability. The Board should reiterate that the operation of unauthorized transmitting earth stations in a territory was a breach of obligations and strongly urge the Administration of Norway to take all appropriate actions at its disposal to have the operator of the Starlink system immediately disable unauthorized transmissions of its terminals within the territory of the Islamic Republic of Iran, just as had been done in other countries.

12.8 **Mr Azzouz** agreed with that assessment, adding that there was a need for enforcement measures to be applied in cases of non-compliance.

12.9 **Mr Fianko** said that the Board should reiterate its previous decision. It was clear that *resolves* 2 and 3 ii) of Resolution **22 (Rev.WRC-23)** were not separate but complementary. Under *resolves* 2, the notifying administration was required, to the extent practicable, to limit the operation of transmitting earth stations on an administration's territory to only those that were licensed or authorized by said administration. None of the terminals operating in the Islamic Republic of Iran were licensed or authorized by that administration; moreover, the feasibility of limiting the operation of terminals based on their location seemed no longer to be contested.

12.10 **Mr Cheng** said that the Board should restate the notifying administration's obligations under Article **18** and Resolutions **22 (Rev.WRC-23)** and **25 (Rev.WRC-23)**. **Ms Beaumier** and **Mr Fianko** agreed with that suggestion.

12.11 **Ms Beaumier** said that the Administration of Norway seemed to be relying on a narrow interpretation of *resolves* 3 of Resolution **22 (Rev.WRC-23)**, according to which the reporting administration was responsible for the onerous task of identifying and locating any and all unauthorized stations on its territory – which was not explicitly stated in the provision – before the notifying operator was obliged to request Starlink to take action, irrespective of the latter's proven technical capabilities. Reliance on such a narrow interpretation would render the obligation on the reporting administration impossible to achieve.

12.12 She pointed out that the Administration of the Islamic Republic of Iran had repeated the difficulties it faced in detecting, identifying and locating terminals on its territory; however, it had failed to provide the information that the Board had requested, namely the specific measures it had taken and was continuing to take in that endeavour. That information should be provided. Regarding the associated administration, she emphasized that it had no obligations or status under the Radio Regulations. The associated administration was identified on a filing for information purposes only, to facilitate the identification of interested parties in the exchange of information; in the current case, doing so might have caused some confusion.

12.13 She disagreed with the assertion by the Administration of Norway that, in interpreting the intent of WRC-19, the Board was overstepping its mandate. It was a clear misunderstanding of the role of the Board. She noted that, in its decisions, the Board routinely considered the intent of WRCs, since it was not always explicitly rendered in the resulting provision of the Radio Regulations; if it was, there would be no ambiguities or inconsistencies for the Board to address. The Board was sometimes required to identify the intent and go beyond the written word to ensure the meaningful implementation of a particular resolution, just as it had done, for example, in respect of Resolution **559 (WRC-19)**. The situation was no different with Resolution **22 (Rev.WRC-23)**. The **Chair** agreed that it was part of the Board's mandate to do so, pursuant to the ITU Constitution and the Rules of Procedure.

12.14 **Mr Henri**, referring to the news article on the deactivation of terminals in Myanmar, said he was concerned at what appeared to be a double standard by Starlink. There was no indication that the Administration of Myanmar had provided Starlink with a list of unauthorized terminals, requesting their deactivation; instead, Starlink seemed to have proactively taken that step. While the case under consideration had been considered in-depth by the Board at several meetings, there was now greater clarity on the administrations' differing views of the provisions of Resolution **22 (Rev.WRC-23)** and confirmation of the feasibility of the operator disabling all unauthorized earth stations. He noted that, at the 99<sup>th</sup> meeting,

the Board had already outlined its view in respect of *resolves 2 and 3 ii* of Resolution 22 (Rev.WRC-23) and agreed to include the issue in its report to WRC-27 under Resolution 80 (Rev.WRC-07).

12.15 **Mr Azzouz**, noting that administrations supported the ITU mission in different ways, said that, according to the information submitted by some satellite operators to Working Party 4A, the capability to disable unauthorized terminals could be applied within a very short time-frame. It was clear from the news article on the action taken in Myanmar and past information brought to the Board's attention that Starlink had the capability to disable terminals en masse.

12.16 **Mr Cheng**, **Mr Henri** and **Mr Azzouz**, noting that the matter had been considered in-depth by the Board at several meetings, agreed that it was time to proceed to the publication of information under *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022) of the Plenipotentiary Conference.

12.17 **Mr Vallet (Chief, SSD)** presented the draft webpage developed by the Bureau, at the Board's behest, for the publication of information under *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022). He noted that the Board had previously agreed that it would prepare a statement for publication. It was proposed that the webpage should also contain documents relating to the relevant meetings and links to the summary of decisions, the minutes of meetings and the related regulations and resolutions. An alternative approach might be to replace the Board's statement with the decision taken at each meeting.

12.18 Following extensive discussion, **Mr Fianko**, **Ms Beaumier**, **Mr Henri**, **Ms Manneppalli**, **Mr Azzouz**, **Ms Hasanova** and **Mr Di Crescenzo** agreed that, in accordance with *resolves to instruct the Radio Regulations Board 2* of Resolution 119 (Rev. Bucharest, 2022), which referred to the publication of relevant information, the Board would not make any additional commentary or statement. Information on the webpage would be organized by meeting, starting from the first meeting at which the matter was discussed, thereby enabling readers to follow the case's progression. It would bring together in one place information that was already available, namely the following: the Board's decision at each meeting; input provided by the administrations concerned, with existing access permissions; and background information on the relevant regulations and resolutions. No link would be provided to the minutes of the Board's meetings, since they did not relate solely to the case in hand. The Bureau should publish the webpage, once finalized.

12.19 The **Chair** proposed that the Board conclude on the matter as follows:

"The Board carefully considered Document RRB25-3/22 from the Administration of the Islamic Republic of Iran, Document RRB25-3/29 from the Administration of the Norway and Document RRB25-3/32 from the Administration of the United States, on the provision of Starlink satellite transmissions in Iranian territory. The Board also noted Document RRB25-3/DELAYED/6 from the Administration of the Islamic Republic of Iran for information.

The Board noted with grave concern the following points:

- The Administration of the Islamic Republic of Iran had again reported the continuing unauthorized operation of Starlink terminals within its territory.
- The Administration of Norway was unwilling to enforce the Board's prior decisions to immediately cease unauthorized transmissions of Starlink terminals within the territory of the Islamic Republic of Iran on its satellite operator in the absence of an explicit requirement in the regulatory framework.

The Board further noted that:

- Starlink had recently proactively identified and disabled over 2 500 terminals operating illegally in a given area, demonstrating that it was capable of geolocating and deactivating terminals remotely.
- The Administration of Norway was of the view that it was outside the scope of the Board's mandate to interpret the intentions of WRC-19.

- The Administration of the Islamic Republic of Iran had reiterated the difficulties it faced but had not described the efforts undertaken to detect and identify the location of terminals.
- The Administration of the Islamic Republic of Iran had experienced difficulties related to receiving and addressing correspondence from both a notifying administration and its associated administration.

The Board concluded that:

- It was acting within its mandate under Article 14, No. 96 of the ITU Constitution.
- The associated administration had no obligations or status under the Radio Regulations. An associated administration was identified on a filing for information purposes only to facilitate the identification of interested parties in the exchange of information, for instance during the coordination process.
- There was no explicit requirement in *resolves* 3 of Resolution **22 (Rev.WRC-23)** for the reporting administration to identify and locate any and all unauthorized stations on its territory in order for the satellite network operator to provide assistance; reliance on such a narrow interpretation would render the obligation on the reporting administration impossible to achieve and would be contrary to the objective of the resolution to prevent unauthorized transmissions.

Consequently, the Board decided to:

- request the Administration of the Islamic Republic of Iran to pursue its efforts, to the extent possible, to identify and deactivate unauthorized Starlink terminals in its territory, in accordance with *resolves* 3 i) of Resolution **22 (Rev.WRC-23)**;
- again request the Administration of Norway to comply with Resolutions **22 (Rev.WRC-23)**, **25 (Rev.WRC-23)** and Article **18** of the Radio Regulations;
- strongly urge the Administration of Norway to take all appropriate actions at its disposal to have the operator of the Starlink system immediately disable unauthorized transmissions of its terminals within the territory of the Islamic Republic of Iran.

In addition, the Board instructed the Bureau to publish the webpage on the matter under *resolves to instruct the Radio Regulations Board* 2 of Resolution 119 (Rev. Bucharest, 2022) of the Plenipotentiary Conference."

12.20 It was so **agreed**.

### 13 Submission by the Administration of Canada requesting clarification on the application of Resolutions 8 (WRC-23) and 35 (Rev.WRC-23) to non-geostationary-satellite networks during the milestone process (Document [RRB25-3/25](#))

13.1 In reply to a query from **Ms Beaumier** about her participation in the deliberations, **Ms Hasanova**, **Mr Azzouz** and **Mr Talib** said that they would be pleased to hear her views on agenda item 13, which concerned a matter of principle that was applicable to any country, not just Canada.

13.2 **Mr Ciccorossi (Head, SSD/SSS)** introduced Document RRB25-3/25, in which the Administration of Canada observed that *resolves* 9 c) of Resolution **35 (Rev.WRC-23)** allowed the number of satellites declared in a milestone report to be greater than the number deployed at the expiry of the relevant milestone period, provided that proper justification was given for the discrepancy. *Resolves* 12 of Resolution **8 (WRC-23)**, on the other hand, appeared to deny that possibility, particularly in cases in which the tolerances had been exceeded for more than 60 days. In other words, when Resolution **35 (Rev.WRC-23)** was initially adopted, administrations had had the possibility to have different numbers of satellites between milestones. If they were reaching the maximum required for the subsequent milestone, they could move satellites to remain within the tolerances if they provided an explanation; Resolution **8 (WRC-23)**, however, stipulated that once a satellite had been deployed and was in the "small box" phase ( $\pm 30$  km), it could not be moved outside the box for more than 60 consecutive days.

13.3 In its submission, the Administration of Canada asked which resolution took precedence for the purposes of counting satellites towards milestone compliance and why. The answer was essential for

determining whether a non-GSO satellite deployed at a notified orbit – taking into account the tolerances stipulated in the relevant provisions of Resolution **8 (WRC-23)** – for only a limited time within the milestone period could be counted towards the milestone in question or had to be excluded owing to the restrictions stipulated in *resolves* 12.

13.4 In reply to a query from **Mr Azzouz**, he added that Resolution **8 (WRC-23)** had entered into force on 1 January 2025. It covered two scenarios. The first related to systems for which the seven-year regulatory deadline for bringing or bringing back into use under Resolution **35 (Rev.WRC-23)** fell before 1 January 2025, in which case the submission deadline for Resolution **8 (WRC-23)** information was 1 April 2025. The second related to systems for which the seven-year regulatory deadline for bringing or bringing back into use under Resolution **35 (Rev.WRC-23)** fell on or after 1 January 2025, in which case the deadline was the same as the milestone submission time-limit under Resolution **35 (Rev.WRC-23)**.

13.5 **Mr Henri** said that, in his view, *resolves* 12 of Resolution **8 (WRC-23)** referred to the number of space stations deployed at the end of a milestone period for a system that had not completed the milestone process. However, under *resolves* 9 c) of Resolution **35 (Rev.WRC-23)**, the system could have had more satellites during the milestone period taken into account, provided that the notifying administration had furnished a detailed explanation. The Bureau would take into account the total number of satellites deployed during the period as reported by the notifying administration for future milestones so long as the tolerance referred to in *resolves* 11 of Resolution **8 (WRC-23)** had not been exceeded for a period of 60 consecutive days. It was the relationship between those two provisions that the Board was being asked to clarify. He construed the two *resolves* to mean that the total number of satellites deployed during a milestone period could continue to be taken into account if, as stipulated in *resolves* 12 of Resolution **8 (WRC-23)**, the extra satellites had been operating within the tolerance of Resolution **8 (WRC-23)**, i.e. had been outside the “small box”, for less than 60 consecutive days. The approach was similar to that applying in the case of a satellite that had been brought into use on a certain date and for which the information had been provided subsequently; the past bringing into use would be taken into account insofar as the frequency assignments to the satellites concerned had been operating continuously in accordance with the Appendix 4 information recorded since that past date. WRC-27 might consider reviewing both Resolutions **8 (WRC-23)** and **35 (Rev.WRC-23)**, but in the meantime he did not see one resolution as having precedence over the other and considered that the relationship between them was clearly indicated in *resolves* 2 and 3 of Resolution **8 (WRC-23)**, which pertained to systems received before the resolution’s date of entry into force and systems received after its entry into force, respectively.

13.6 The Board might, at some point in the future, endeavour to define the term “detailed explanation” under *resolves* 9 c) i) of Resolution **35 (Rev.WRC 23)**, through a rule of procedure or in some other way.

13.7 **Mr Cheng** thanked the Administration of Canada for its thought-provoking question and agreed that there did not appear to be a regulatory inconsistency between the two resolutions. It was his understanding that *resolves* 9 c) of Resolution **35 (Rev.WRC-23)** related to the number of satellites on expiry of the relevant milestone period, i.e. it dealt with one particular milestone period; *resolves* 12 of Resolution **8 (WRC-23)** dealt with two consecutive milestones and addressed the question of whether a satellite that had already counted towards a milestone could be counted for another milestone. For example, a satellite launched before the M1 expiry date could be counted towards milestone 1 at the end of the M1 period but not towards milestone 2, because it did not comply with the tolerance defined in Resolution **8 (WRC-23)**.

13.8 **Ms Beaumier** said that no resolution had precedence over the other; both Resolution **35 (Rev.WRC-23)** and Resolution **8 (WRC-23)** applied concurrently. When calculating the number of satellites deployed to determine compliance with a milestone under Resolution **35 (Rev.WRC-23)**, all the satellites that had been deployed could be counted and reported even if they were no longer in orbit or at the same location, but an explanation of the difference had to be provided. However, Resolution **8 (WRC-23)** added another condition which was to only include satellites that did not exceed tolerances for more than 60 consecutive days. The purpose of *resolves* 2 of Resolution **8 (WRC-23)** was to enable the Bureau to collect baseline information on tolerances for systems that had already been brought into use. The way the resolution was drafted made it clear that it was meant to apply to all systems before and after the resolution’s entry into force, and therefore allowed for some variance in tolerances.

13.9 **Mr Ciccorossi (Head, SSD/SSS)** agreed, adding that both *resolves* 2 and 3 applied equally to *resolves* 6, 7 and 9 of Resolution **8 (WRC-23)** for all tolerances. In response to a request from **Mr Azzouz** and **Ms Mannepalli**, he gave two examples of the application of both resolutions in the case of a non-GSO constellation that had been notified with an altitude of less than or equal to 2 000 km (a LEO system), a notified apogee that was equal to the perigee at a nominal altitude of 600 km and a total of 100 satellites. The first satellite had been launched and the constellation brought into use at 650 km, within  $\pm 70$  km (the “big box”) of the tolerances of the first declaration with respect to the nominal altitude. Subsequently, nine more satellites were launched, meaning that the 10% M1 requirement had been attained. In the first scenario, the milestone had been reached before 1 January 2025, or before the entry into force of Resolution **8 (WRC-23)**, and at that point only five satellites had remained – the other five had been moved outside the tolerances. They nevertheless counted towards the milestone under *resolves* 9 c) of Resolution **35 (Rev.WRC-23)**. *Resolves* 2 of Resolution **8 (WRC-23)** clearly applied in such cases, i.e. those received before the seven-year regulatory deadline of 1 January 2025, and gave administrations until 1 April 2025 to provide the information required under Resolution **8 (WRC-23)**.

13.10 In the second scenario, the first milestone had been reached after 1 January 2025. In such cases, it was *resolves* 3 and 4 of Resolution **8 (WRC-23)** that applied. Again, one satellite had been launched and brought into use within the tolerances ( $\pm 70$  km, or the “big box”) of the first declaration. Nine more satellites were subsequently launched, fulfilling the 10% requirement for an unknown period. By the time milestone 1 was achieved, five satellites had been moved away from the  $\pm 30$  km “small box”. They could not count towards achievement of the milestone under *resolves* 12 of Resolution **8 (WRC-23)**. Instead, *resolves* 14 or 15 of Resolution **8 (WRC-23)** would apply, as a modification or discontinuation of the frequency assignments was required.

13.11 To sum up, in the first scenario, ten satellites had been deployed within the tolerances and five had subsequently been moved outside the tolerances before milestone 1 and before 1 January 2025. *Resolves* 2 of Resolution **8 (WRC-23)** applied and the Resolution **8** information had to be submitted before 1 April 2025. In the second scenario, ten satellites had been deployed within the tolerances and five had subsequently been moved outside the tolerances before milestone 1 but after 1 January 2025. *Resolves* 3 and 4 of Resolution **8 (WRC-23)** applied and the Resolution **8** information had to be submitted together with the Resolution **35** submission (i.e. before the milestone deadline).

13.12 It was the Bureau’s view, therefore, that there was no conflict between Resolution **35 (Rev.WRC-23)** and Resolution **8 (WRC-23)** and that neither took precedence over the other. Resolution **8 (WRC-23)** added a restriction. While *resolves* 12 dealt with two consecutive milestones and the issue of a satellite to be counted towards the next milestone provided that the tolerances were not exceeded for more than 60 consecutive days, *resolves* 6, 7 and 9 stated that the tolerances applied equally in the case of *resolves* 2 (seven-year regulatory time-limit before 1 January 2025) and *resolves* 3 and 4 (seven-year regulatory time-on or after 1 January 2025).

13.13 In reply to questions from **Ms Mannepalli** and **Ms Beaumier**, he confirmed that the difference between the two scenarios was the deadline for milestone 1, before or after 1 January 2025. In the first scenario, the five satellites that had been moved away could count towards the M1 requirement provided that they had been within the tolerances when brought into use, as verified by the Bureau.

13.14 The **Chair** proposed that the Board should conclude as follows on the matter:

“The Board carefully considered Document RRB25-3/25, in which the Administration of Canada submitted a request for clarification on the application of Resolutions **8 (WRC-23)** and **35 (Rev.WRC-23)** regarding the counting of satellites during the milestone process.

The Board noted the following points:

- Resolution **35 (Rev.WRC-23)**, in its *resolves* 9 c), allowed for the number of satellites declared in the milestone report to be greater than the number deployed at the expiry of the relevant milestone period, provided that proper justification for the discrepancy was given.
- When a satellite exceeded the tolerances for more than 60 consecutive days, Resolution **8 (WRC-23)** prevented its inclusion in the number of satellites at the reported milestone submission.

- The Administration of Canada expressed concern that the possibility provided under *resolves* 9 c) of Resolution **35 (Rev.WRC-23)** appeared to be restricted by the adoption of Resolution **8 (WRC-23)**, with no indication that the implication on the application of those two specific resolues of Resolutions **35 (Rev.WRC-23)** and **8 (WRC-23)** had been investigated or even noted during WRC-23.

The Board concluded that:

- Resolutions **35 (Rev.WRC-23)** and **8 (WRC-23)** did not conflict with one another and had the same status;
- neither resolution had precedence over the other but Resolution **8 (WRC-23)** did introduce a new criteria or requirement that must be respected;
- *resolves* 6, 7 and 9 of Resolution **8 (WRC-23)** stated that tolerances applied equally in the case of *resolves* 2 (7-year regulatory deadline before 1 January 2025) and *resolves* 3 or 4 (7-year regulatory deadline on or after 1 January 2025)."

13.15 It was so **agreed**.

## **14 Election of the Vice-Chair for 2026**

14.1 Having regard to No. 144 of the ITU Convention, the Board agreed that Ms S. HASANOVA, Vice-Chair of the Board for 2025, would serve as its Chair in 2026. The Board agreed to elect Mr J. CHENG as its Vice-Chair for 2026 and thus as its Chair for 2027.

## **15 Confirmation of the next meeting for 2026 and indicative dates for future meetings**

15.1 The Board confirmed the dates for the 101<sup>st</sup> meeting as 23-27 March 2026 (Room L).

15.2 The Board further tentatively confirmed the dates for its subsequent meetings in 2026, as follows:

- 102<sup>nd</sup> meeting: 29 June–3 July 2026 (Room L);
- 103<sup>rd</sup> meeting: 26-30 October 2026 (Room L);

and in 2027, as follows:

- 104<sup>th</sup> meeting: 15-19 February 2027 (Room L);
- 105<sup>th</sup> meeting: 24 May–1 June 2027 (Room L);
- 106<sup>th</sup> meeting: 20-24 September 2027 (Room L).

## **16 Other business**

16.1 The Chair of the Working Group on Resolution **80 (Rev.WRC-07)**, Ms C. BEAUMIER, said that she would circulate the list of items to include in the report to Board members for comment.

## **17 Approval of the summary of decisions**

17.1 The Board approved the summary of decisions as contained in Document RRB25-3/33.

## **18 Closure of the meeting**

18.1 At the conclusion of the historic 100<sup>th</sup> meeting of the Board, the **Chair** said that it had been a privilege to lead a group made up of such remarkable individuals. The expertise of Board members and

Bureau staff had made his journey as chair a memorable experience. He was sure that Ms Hasanova would do an excellent job in 2026.

18.2 The **Director** congratulated the Chair on the excellent job he had done over the year, maintaining the Board's group spirit, productivity and neutral standing. He, too, was sure that Ms Hasanova would continue in the same vein and that she would bring the same passion to that role as she had shown as Chair of the Working Group on the Rules of Procedure.

18.3 **Ms Hasanova** thanked all Board members and Bureau staff for their trust and support.

18.4 The **Chair** closed the meeting on Friday, 14 November 2025 at 1730.

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