|  |  |
| --- | --- |
| **World Radiocommunication Conference (WRC-15) Geneva, 2–27 November 2015** |  |
| **INTERNATIONAL TELECOMMUNICATION UNION** |  |
|  |  |
| PLENARY MEETING | **Addendum 9 to Document 61(Add.21)-E** |
|  | **14 October 2015** |
|  | **Original: English** |
|  | |
| Iran (Islamic Republic of) | |
| Proposals for the work of the conference | |
|  | |
| Agenda item 7(I) | |

7 to consider possible changes, and other options, in response to Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference, an advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution **86 (Rev.WRC‑07)** to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary‑satellite orbit;

7(I) Issue I – Possible method to mitigate excessive satellite network filings issue

Introduction

WRC-12 and previous conferences had introduced notable reinforcement to the current regulatory regime that governs the access to these natural resources. In studying this issue, it has been brought to the attention of the ITU-R that considerable portions of satellite network filings in the phases of advance publication and coordination are usually suppressed by the seven-year regulatory time-limit. Recognizing the uncertainties of coordinating frequency assignments in certain orbital positions in a timely manner, notifying administrations usually submit diverse network filings in order to accommodate these uncertainties and to ensure the availability of these scarce resources. On the other hand, some of these filings are kept in the coordination stage without being brought into use, rather than being suppressed. Consequently, this may result in increasing the coordination requirement and complexities for later-filed networks. As a result, these filings may appear to be an excess to the needs of the notifying administration, whereas some of these filings may have not been brought into use for other reasons. The supposed problem area targeted in Issue I is not caused by administrations correctly applying the RR, it is the failure of administrations with filings in the process to suppress frequency assignments that are not going to be used before the end of the seven-year regulatory lifetime. However, there is no requirement in the RR to suppress a filing early, even though this may be consistent with the guiding principles of the ITU in the Constitution and Convention, and multiple resolutions for the efficient use of spectrum resources.

Different forms of excessive filings were addressed. One form was the submission of multiple advance publication followed by additional advance publication every 18 months, which create uncertainties for later filings. A second form was submitting multiple coordination request filings, in some cases, every 1 to 3 degrees in some parts of the arc in the same frequency band which creates up to seven years of uncertainty for the later filings. A notable portion of these filings are suppressed after the expiry of the regulatory deadline time-limit of seven years. This results in a large number of network filings that may not be brought into use, adds complexities in frequency coordination process, and can result in inefficient use of radio-frequency spectrum and orbital resources.

One of the primary reasons for administrations periodically submitting multiple API requests at every 2 or 3 degrees around the geostationary orbit is precisely to minimize the impact of the six month delay between BR receipt of the API and CR/C and obtain a clear date of receipt priority as quickly as possible. Subsequent submission of multiple CR/Cs associated with these multiple APIs may be seen as providing some flexibility and reducing the uncertainties associated with the coordination process. On the other hand, these multiple coordination request filings can have a severe impact on later filed networks that are required to coordinate with a large list of networks that are likely to be deleted at the end of their regulatory deadline, which reaches in some cases for almost 70% of the list of coordination requirements for the network coming at a later time, which leads to add more of the complexities and difficulties for coordination process and results in increasing uncertainties for coordinating this networks in timely manner.

Once an administration has submitted the CR/C and paid the cost recovery charges associated with processing the CR/C, there is no financial incentive for the administration to suppress the filing, even those that are not intended to be used. On the other hand, by maintaining a filing until the end of the seven-year period, if there is a change in the satellite network architecture or a new business requirement is developed after the CR/C is filed, the administration can take advantage of the existing satellite network filing. Administrations without the resources available to other larger, more-established space-faring nations, have voiced concerns regarding the current administrative burden required to maintain a filing. While it would be most spectrally efficient to suppress undesired CR/C filings, there exist financial and strategic advantages for maintaining the satellite network filings which administrations may consider over the seven-year regulatory period.

Regarding APIs, at this stage ,I.R. of Iran supports Method I2.3.

ARTICLE 9

Procedure for effecting coordination with or obtaining agreement of other administrations1, 2, 3, 4, 5, 6, 7, 8, 8*bis*    (WRC‑12)

MOD IRN/61A21A9/1

Section I − Advance publication of information on satellite  
networks or satellite systems

General

For a complete regulatory solution, see § 5/7/3.6.3.2 of the CPM Report to the WRC-15 Conference (Issue C under WRC-15 agenda item 7 Method C3 option B).

**Reasons:** To suppress the six-month period between the date of receipt of API and the date of receivability of the associated coordination request under Section II of RR Article 9, in order to reduce the part dedicated to publication of special sections within the coordination process.

MOD IRN/61A21A9/2

Sub-Section IB − Advance publication of information on satellite networks or satellite  
systems that are subject to coordination procedure under Section II

For a complete regulatory solution, see § 5/7/3.6.3.2 of the CPM Report to the WRC-15 Conference (Issue C under WRC-15 agenda item 7 Method C3 option B).

**Reasons:** Consequential to the suppression of the six-month period because the coordination procedure can be initiated before the publication of the advance publication.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_