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| **World Radiocommunication Conference (WRC-19)Sharm el-Sheikh, Egypt, 28 October – 22 November 2019** |  |
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| **PLENARY MEETING** | **Addendum 22 toDocument 16-E** |
| **8 October 2018** |
| **Original: English** |
| European Common Proposals |
| proposals for the work of the conference |
|  |
| Agenda item 9.2 |

9 to consider and approve the Report of the Director of the Radiocommunication Bureau, in accordance with Article 7 of the Convention:

9.2 on any difficulties or inconsistencies encountered in the application of the Radio Regulations[[1]](#footnote-1)\*; and

Introduction

WRC-19 agenda item 9.2 deals with the Report of the Director of the Radiocommunication Bureau on inconsistencies in the Radio Regulations and difficulties encountered in the application of the Radio Regulations that are identified by the administrations, the Radiocommunication Bureau and the Radio Regulations Board, as well as the suggestion of the Radiocommunication Bureau and the Radio Regulations Board of modifications of the Radio Regulations to alleviate such difficulties and inconsistencies.

CEPT studied numerous issues covered by the Director of the Radiocommunication Bureau in its Report and prepared the European views and proposals.

Summary of European proposals

As the procedures of coordination and notification for non-planned satellite networks are concerned, these European proposals support to cease the publication of API/C Special Sections in BR IFIC as all necessary data the Bureau can make available at its website (3.1.3.1). Also, the modification of RR No. **9.4** (3.1.3.3) is proposed in order to make the preparation of progress report for administrations in question non-obligatory.

In addition to that, the European proposals support the alignment of the procedure of bringing back into use with the bringing into use procedure in RR Article **11** (3.1.4.1), as well as the introduction of possibility to indicate the status of coordination under RR No. **9.7** at notice level for examination under RR Nos. **11.32** and **11.32A** (3.1.4.2.2), which would make the notification procedure of RR Article **11** more straightforward and practical and would decrease the number of future RR No. **11.41** applications.

Concerning regulatory procedures for planned broadcasting-satellite service (BSS) frequency bands covered by RR Appendices **30** and **30A**, these European proposals support the introduction of reminders in RR Appendices **30** and **30A** in cases of temporary agreements between RR Appendices **30** and **30A** networks (3.2.4.2), as well as in cases of expiry of first 15 years of operation of BSS List assignments (3.2.4.3). Also, modifications to Section 6 of Annex 1 to Appendix **30** are proposed in order to correct the inconsistencies between different Sections of Annex 1 to RR Appendix **30** and with Annex 4 to RR Appendix **30** (3.2.4.8).

In addition to that, the incorporation of Rule of procedure on RR No. **5.510** (3.2.4.6) is supported, as well as the introduction of a footnote in Article 2A of RR Appendices **30** and **30A** to clarify the non-applicability of administrative due diligence procedure for planned BSS submissions for space operation functions (3.2.4.10).

With respect to regulatory procedures of planned fixed-satellite service (FSS) networks of RR Appendix **30B**, these European proposals support the removal of mandatory 2-year period for bringing into use from § 6.1 of RR Appendix **30B** (3.2.5.1), and propose to modify § 6.16 of Appendix **30B** to allow relocation of test points in the case of request for exclusion of a country on whose territory these test points are situated (3.2.5.2).

In the case of two-months deadline for the publication of notification submission in § 8.5 of RR Appendix **30B** (3.2.5.3) it is proposed to modify this provision in order to correct the current inconsistency and to differentiate two possible cases of notification submissions under RR Appendix **30B**.

As well, these European proposals support the modification of § 6.19 of Appendix **30B** (3.2.5.7) in order to put an obligation for the administration submitting its assignments for entry into the RR Appendix **30B** List to obtain explicit agreements from all administrations whose territories are placed in the final service area.

At the end, these European proposals support modifications of Resolution **49 (Rev.WRC-15)** (3.3.1) in order to correct the inconsistency with respect to deadline for submission of the administrative due diligence data, as well as to supress all transition measures that were implemented long time ago and that are not needed any more in the body of the Resolution. In addition to that, an obligation to make updates of due diligence information is included into the revised Resolution **49 (Rev.WRC-15)** text.

The European proposals summarized above are divided into 14 distinct addenda. For each Addendum, the corresponding sub-section number from the Director’s Report is also indicated.

**Addendum 1** Part 1 – Cease of publication of API/C in BR IFIC (3.1.3.1)

**Addendum 2** Part 2 – Requirement of a progress report under RR No. **9.4** (3.1.3.3)

**Addendum 3** Part 3 – Procedure of bringing back into use of a suspended assignment (3.1.4.1)

**Addendum 4** Part 4 – Indication of status of coordination under RR No. **9.7** at notice level for examination under RR No. **11.32A** (3.1.4.2.2)

**Addendum 5** Part 5 – Modifications to Resolution **49 (Rev.WRC-15)** (3.3.1)

**Addendum 6** Part 6 – Reminder before the expiry of temporary agreement between RR Appendices **30** and **30A** networks (3.2.4.2)

**Addendum 7** Part 7 – Reminder before the expiry of first 15 years of operation of a RR Appendices **30** and **30A** Region 1 and 3 List assignment (3.2.4.3)

**Addendum 8** Part 8 – Rule of procedure on RR No. **5.510** (3.2.4.6)

**Addendum 9** Part 9 – Inconsistency in Section 6 of Annex 1 to RR Appendix **30** (3.2.4.8)

**Addendum 10** Part 10 – Non-applicability of Resolution **49** for submissions under Article 2A of Appendices **30** and **30A** (3.2.4.10)

**Addendum 11** Part 11 – Removal of mandatory 2-year period for bringing into use from § 6.1 of RR Appendix **30B** (3.2.5.1)

**Addendum 12** Part 12 – Relocation of downlink test points following the application of § 6.16 of RR Appendix **30B** (3.2.5.2)

**Addendum 13** Part 13 – Two-months deadline for the publication of notification submission in § 8.5 of RR Appendix **30B** (3.2.5.3)

**Addendum 14** Part 14 – Proposed modification to § 6.19 of RR Appendix **30B** (3.2.5.7)

**Addendum 15** Part 15 – Proposed modifications of RR No **5.441B** (3.6.6)

In addition to proposals presented above, CEPT has the following views and positions with respect to different items covered in the above-mentioned Director’s Report.

With respect to the issue of draft CR/D database that is made available in BR IFIC before publication of CR/D in accordance with RR No. **9.53A** (3.1.3.4 of the Director’s Report), CEPT agrees with the Bureau that this procedure has no practical usefulness and at the same time it is using considerable resources of the Bureau. CEPT supports to cease such practice. Each administration could react to official publications of CR/D special sections in order to request a modification or an addition to the published data. In such a case, a modification of the CR/D Special Section in question would be published.

Concerning the examination under RR No. **11.32** and **11.32A** based on coordination agreement status at group level of RR Appendix **4** notice forms (3.1.4.2.1), CEPT supports the development of a software tool by the Bureau in order to help administrations, while notifying their networks, to define a coordination status with respect to an affected administration at network and group level by indicating the satellite networks for which they have completed or not completed coordination. In addition to that, such coordination status would be reflected in a publication.

In the subject of submissions containing antennas with the antenna contours that results in a minimum absolute antenna gain value less than −10 dBi (3.2.4.4), CEPT is of the view that additional studies are needed. With respect to multiple earth station per submission in RR Appendices **30** and **30A** (3.2.4.5), CEPT understands the Bureau’s idea to limit the number of antennas to 3 for each RR Appendices **30** and **30A** submission, however since there are administrations linking antenna characteristics to landing rights (they need an exact match), the maximum number of antennas might need to be increased to maximum 5.

In the issue concerning the coordination arc for Article 2A in 14 GHz (3.2.4.7), CEPT supports the incorporation of the existing Rule of Procedure on § 2A.1.2 of RR Appendix **30A** into the Radio Regulations. With respect to calculation of ΔT/T in Section 2 of Annex 4 to RR Appendix **30A**, (3.2.4.9) CEPT supports the Bureau’s proposed modification of the section 2 of Annex 4 of RR Appendix **30A**.

With respect to the use of earth station antenna radiation patterns specific to RR Appendices **30** and **30A** for submissions under RR Appendix **30B** (3.2.5.4), CEPT is of the view that the MODRES radiation pattern should continue to be accepted in new RR Appendix **30B** submissions on provisional basis, until a modification of Recommendation ITU-R BO.1213 is approved. The MODRES radiation pattern is very spread, not only for RR Appendix **30** and **30A** submissions, but in general. MODRES radiation pattern is the one preferred for the BSS reception and DTH reception in general.

Regarding the issue of possible alignment of coverage and service area for submissions under RR Appendix **30B** (3.2.5.5) and subsequent change to item B.3.b.1 of Annex 2 to RR Appendix **4**, CEPT doesn’t see the need to align the coverage and service area for submissions under RR Appendix **30B** as CEPT prefers to keep the flexibility of definition of coverage areas of fixed beams in submissions to the BR. Also, it should be stressed that possible changes to this item would have much broader implications then just to future RR Appendix **30B** submissions.

With respect to proposed modifications to § 6.21 of RR Appendix **30B** (3.2.5.8), CEPT support the suggestion of the Bureau to modify § 6.21 of RR Appendix **30B** in order to take into account also the networks under examination that were not identified as affected under § 6.5 of RR Appendix **30B**.

As the issue of assignments with global or regional coverage but small service area in RR Appendix **30B** (3.2.5.9) is concerned, CEPT emphasizes that this is a delicate issue which is mainly due to the explicit agreement to be included in the service area. As a satellite needs to be ordered 3 or 4 years before the end of the 8-year period, it’s difficult to know in advance which countries will finally agree to be included in the service area. Therefore, CEPT doesn’t support the Bureau suggestion.

With respect to possible update of Article 10 of RR Appendix **30B** (3.2.5.10), CEPT supports the Bureau’s suggestion.

In the case of possible revision to the implementation of RR No. **11.47** with respect to provisional recordings (3.1.4.3) CEPT supports the Bureau’s suggestion to remove the requirement to submit under item A.2.a foreseen date of bringing into use (i.e. a date later than the date of receipt of the notification notice).

Concerning issue of small holes and unrealistic gain contours in the satellite antenna gain diagrams to avoid coordination (3.2.6) CEPT would like to emphasize that this is a delicate issue and CEPT encourages administration to contribute to this question during the next study cycle.

For the issue of Resolution **55 (Rev.WRC-15)** (3.3.2) CEPT supports the Bureau’s idea to suppress the possibility to submit graphics in paper from. As the issue of Resolution **554 (WRC-12)** (3.3.3) is concerned, CEPT agrees with the Bureau suggestion to clarify that the pfd masks are only applicable over the service area of frequency assignments of existing satellite networks and no assessment of pfd levels should be carried out in the service area of the incoming assignment.

Also, CEPT agrees with the Bureau suggestion to clearly indicate that Resolution **762 (WRC-15)** (3.3.4) should be used only to identify probability of causing harmful interference in space-to-Earth and Earth-to-space directions of transmission and endorse the proposed modification of RR No. **11.32A.2**.

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1. \* This agenda item is strictly limited to the Report of the Director on any difficulties or inconsistencies encountered in the application of the Radio Regulations and the comments from administrations. [↑](#footnote-ref-1)