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|  | **Document RAG/53-E** |
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| France |
| Considerations and Proposals on ITU-R E-Communications System Under Resolution **907 (Rev.WRC-15)** |

# 1 Introduction

Resolution **907 (Rev.WRC-15**) contained in the Radio Regulations is a key regulatory instrument paving the way for the development of the “e-Communications”system, a crucial support tool for more efficient satellite network coordination activities. As reported in previous RAG meetings, and with the remarkable support of Japan, the Radiocommunication Bureau (BR) has been considerably improving satellite network coordination processes by making available such a relevant tool. France welcomes this initiative.

# 2 Taking account of intergovernmental satellite organizations

The e-Communications system was developed in response to Resolution **907** **(Rev.WRC-15)** to allow the use of modern electronic means of communication for administrative correspondence:

• between an administration and the Radiocommunication Bureau;

• between two administrations.

As indicated in the rules of procedure concerning the treatment of change of the notifying administration which acts as the notifying administration of a satellite network on behalf of a group of named administrations, certain provisions of the Radio Regulations (Nos. **9.1, 9.6.1, 11.15.1,** Appendix **30** (§§ **4.1.25, 4.1.3, 4.2.6** and **5.1.1)**, Appendix **30A** (§§ **4.2.6, 4.1.25, 4.1.3** and **5.1.2**), Appendix **30B (§**§ **2.6** and **6.1)** allow for an administration to act on behalf of a group of named administrations for the purpose of notifying the Radiocommunication Bureau of frequency assignments to satellite networks. In such cases, the administration acting on behalf of the group is designated notifying administration for the group within the meaning of the Radio Regulations. In some cases, the above-mentioned provisions are used for the benefit of an intergovernmental organization (a grouping of States constituted on the basis of an international treaty and having its own common organs).

In this case, the administration acting on behalf of the group is designated notifying administration for the group within the meaning of the Radio Regulations. These provisions share the common feature that, whenever an administration acts on behalf of a group (including the notifying administration for its own purposes) of named administrations, all members of the group retain the right to respond in respect of their own services which could affect or be affected by the proposed assignment.

Satellite filings bearing such a symbol are treated separately from filings submitted by the notifying administration on its own behalf: the special sections of such satellite filings show the notifying administration labelled as ADM/ORG, where ADM is the symbol of the notifying administration and ORG the symbol of the intergovernmental satellite organization (instead of being simply labelled ADM). Moreover, the coordination requirements of the satellite system of ADM/ORG include the satellite systems of ADM if the relevant coordination thresholds are exceeded. This method ensures the appropriate implementation of the right of “all members of the group (…) to respond in respect of their own services”.

France requests the Radiocommunication Bureau to consider the possibility of sending and receiving administrative correspondence to ADM/ORG separately from ADM. This would make it possible to take better account of the specific features of frequency assignments that are managed by a notifying administration for the benefit of an intergovernmental organization, as well as the coordination requirements provided for under the Radio Regulations between ADM and ADM/ORG. Such a separation between ADM and ADM/ORG would also avoid administrative correspondence from third party administrations to ADM concerning both ADM satellite networks and ADM/ORG satellite networks.

# 3 Avoiding duplicate correspondence between administrations

According to *resolves* 2 of Resolution **907 (Rev.WRC-15)**, wherever the words “telegram”, “telex” or “fax” are inserted in provisions related to the advance publication, coordination, notification and recording processes of satellite networks, earth stations and radio astronomy stations, including the provisions contained in Appendices **30**, **30A** and **30B**, modern electronic means should be used to the greatest extent possible.

France considers that all correspondence between administrations can be sent by “electronic means”. However, *resolves* 3 of Resolution **907 (Rev.WRC-15)** allows for the possibility of continuing to use other traditional means of communication.

As pointed out in Brazil's contribution RAG20/23-E, this may result in the same letter, with the same content, being processed three or four times, and different copies being received by different departments of an administration on different dates, thus causing additional administrative overheads for all parties involved.

France invites other administrations to choose a single means of communication, preferably the “e‑Communications” tool, and not to duplicate or triplicate administrative correspondence by different means of communication.

# 4 Proposal

France requests:

1 the Radiocommunication Bureau to take account of intergovernmental satellite organizations in the “e-Communication” system;

2 administrations that have registered for the “e-Communications” tool to use only this means of communication, and not to multiply administrative correspondence by other means such as faxes, letters or e-mails.

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