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| FRANCE  |
| further development under resolution 55 (REV.WRC-23) ELECTRONIC SUBMISSION AND PUBLICATION OF SATELLITE NETWORK FILINGS |

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# 1 Background

Resolution **908 (Rev. WRC-15)** instructed the Director of the Radiocommunication Bureau (BR) to implement a secure paperless electronic approach for the electronic submission and publication of satellite network filings and comments (e-Submission). Following WRC-23, Resolution **908 (Rev. WRC-15)** was integrated into Resolution **55 (Rev. WRC-23)** which instructs the BR to continue to develop and improve the e-Submission of Satellite Network Filings, e-Communications and SIRRS platforms to meet the needs of the Radio Regulations with respect to the submission of, and comments on, satellite network filings, as well as the associated correspondence.

# 2 Proposals

France recognizes the BR's efforts in this project have made significant progress, with the help of administrations. In particular, the administration of Japan has contributed significantly to the development of e-submissions and e-communications.

## 2.1 Make the e-Communications system available for use by satellite operators

The desire to include satellite operators in the e-Communications systems of the International Telecommunication Union is an interesting objective. Operators are an integral part of the radiocommunications landscape, and should be included as much as possible in the operating mechanisms of the International Telecommunication Union. However, it should be remembered that the International Telecommunication Union is an intergovernmental organization, as stipulated in its Constitution. As such, any action aimed at strengthening the position of operators to the detriment of that of States could undermine this intergovernmental nature. Thus, the e-Communications system must continue to give a special place to exchanges between member states, while communications with operators must occupy only a secondary position. Furthermore, in keeping with this intergovernmental logic, only administrations should be able to communicate with their operators.

The administration of France therefore agrees with the proposal of Japan in document [[40](https://www.itu.int/md/R23-RAG-C-0040/en)] to consider enabling operators to use e-Communications to communicate with their administration efficiently, and also to promote administrations to use e-Communications. However, the permission of each operator should be designed in such a way that the operator is able to view only the communications between its administration and itself.

The French administration considers that the decision to which operator to forward each incoming letter from the BR has to be made on a case by case basis. Such a decision cannot be made automatically based on the “operating agency”, which is not fully reliable as of today.

First of all, an incoming letter is sometimes relevant to more than just one operator, if it may contain information about several satellite network filings belonging to different operators. It is up to the administration to decide on which operator each letter is forwarded to. Even for incoming letters which contain information about a single satellite network filing, it may still be relevant to different satellite operators, as some filings are shared between multiple satellite operators.

Furthermore, the situation can also evolve over time when a satellite network filing is transferred from one operator to another. In such a case, the rules and restrictions may be decided by the Administration only. Administration may have the ability to deny access to an operator to a specific communication or to all past communications already registered in the tool; essentially to comply with confidentiality issues when a national transfer of use of assignments occur between two national operators

The French administration kindly requests the BR to take these elements into account when enhancing the functionalities of e-Communications to enable satellite operators to communicate efficiently with their administration. France is engaged to help the BR for the development of such a tool.

## 2.2 Encourage administrations to use the e-Communications platform only

The use of a single global communication mode could greatly simplify and standardize international exchanges between administrations, offering considerable advantages in terms of efficiency, security and accessibility. At present, the multiplicity of communication channels, whether by e-mail, e-Communication, facsimile or regular mail, often leads to problems of security and confusion, especially when systems vary from one country to another. Adopting a single mode of communication would not only standardize exchanges, but also speed up the processing of files. This would promote better coordination between governments, which is the aim of the International Telecommunication Union, and guarantee smoother communication, particularly in emergency situations. Using multiple communications tools between administrations for the same transmission creates an unnecessary burden.

If the e-Communications system was made compulsory, it would also provide a simpler framework for exchange, avoiding the risks associated with fragmented communication channels, while facilitating universal access to a reliable communication tool accessible to all. Making this mode of communication compulsory would also promote digital inclusion, ensuring that every state, regardless of location, has access to high-performance communications technology. It would also be in line with the International Telecommunication Union's policy of inclusion of developing countries. In this way, the introduction of a single, mandatory communications system would represent a major step forward in modernizing and securing global exchanges in the field of radiocommunications.

Finally, the French administration considers that the e-Communications system provides a better security and traceability of the correspondence between administrations. It is indeed very easy to find a correspondence from another administration with the search criteria provided by the e-Communications system. It is also possible to find out exactly when a correspondence has been sent by one administration and read by the other administration or the BR, which is of high importance in some regulatory procedures.

Considering the above, France proposes to make the e-Communications platform mandatory for correspondence between administrations in the ITU context. Exceptions could be granted to some administrations when properly explained.

## 2.3 Improve BR Space Software and develop online applications

The administration of France agrees to the proposal from Japan in document [[40](https://www.itu.int/md/R23-RAG-C-0040/en)] to further develop the online tools. However, we kindly request the BR to also continue to develop the software which is directly installed on the user PCs, such as BR-SIS. The PC installed software provides the advantage of doing a full analysis of satellite network filings in situations of low or no connectivity, which is sometimes important, for example in satellite coordination meetings.

The administration of France concurs with the analysis of the administration of Japan that there are sometimes discrepancies between the validation errors of BR-SIS and the ones of the e-Submission tool. The administration of France would kindly request the BR to fix such discrepancy.

# 3 Conclusion

The Administration of France kindly requests the BR to develop and improve the e-Communications system continuously as mentioned above, under Resolution **55 (Rev. WRC-23)**.

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