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| **Council Expert Group onCouncil Decision 482****Second meeting – Geneva, 28 February-1 March 2019** |  |
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|  | **Document EG-D482-2/4-E** |
| **15 February 2019** |
| **English only** |
| **People’s Republic of China** |
| COST RECOVERY APPLICABLE TO NON-GSO SATELLITE SYSTEMS FILINGS |

During the first meeting of the Council Expert Group on Decision 482, when discussing Document [EG-D482-1/4](https://www.itu.int/md/S18-EGD482-C-0004/en), it was mentioned that “Complexity of a non-GSO satellite filing may not be modelled in the most precise way by cost recovery units however alternatives, such as those presented by the BR during the October 2017 meeting of ITU-R Working Party 4A would lead to additional formulas to be inserted in Decision 482, which may complicate the Decision.” However, the Chinese administration is of the current view that precise modelling the complexity of a non-GSO satellite filing should eventually be done by this Group as there are a few parameters which has strong correlations with the workload of the BR. These parameters include

* the number of different orbital altitudes within the filing that affects the number of pfd examinations to be performed; and
* the number of different orbit inclinations within the filing.

The impact of these factors are elaborated in BR’s contribution to the October 2017 meeting of ITU‑R Working Party 4A. It should be noted that currently a number of published filings already contain number of different inclination and/or number of different altitudes as high as over 15. It should also be noted that that these factors, unique to non-GSO system, may give rise to significant increase of the workload of the BR, and the possibility that such filing may increase sharply in the future. Therefore, The Chinese administration is of the view that when considering Procedure B, the expert group should reconsider the introduction of these factors, in line with its mandate.

The Chinese administration does not object to having an upper boundary to invoices, with a view to avoiding non-payment by administrations of very large invoices. However, this upper bound should be carefully studied so as not to encourage or invite the submission of very large/very complex filings, taking into account the limited resource of the BR. The target filings (the top x% filings representing complex/large non-GSO satellite filings) of the study should also be carefully chosen.

The Chinese administration welcomes changes to relevant provisions of the Radio Regulations with a view to the improvement of the efficiency of the BR.