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| **Agenda item: ADM 1** | **Document C25/74-E** |
| **19 May 2025** |
| **Original: English** |
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| Report by the Secretary-General | |
| ANALYSIS OF THE OUTCOME OF THE EXPERT GROUP ON DECISION 482 | |
| **Purpose**  Following the completion of the report of the Expert Group on Decision 482 to the 2025 session of Council on 10 and 11 April 2025, this document contains the assessment of the financial impact of the proposals of the group based on an example year (2023). An example of the modifications to the Annex of Decision 482 (C01, last amended C24) that would be needed to bridge the gap between such estimated financial implications of the Expert Group's proposals and the cost recovery requirements laid down in document [C25/64](https://www.itu.int/md/S25-CL-C-0064/en) is also annexed to this document.  **Action required by the Council**  The Council is invited to **consider** the information provided in this document and to **adopt** the revised fees contained in the [Annex](#Annex) as a means to close the financial gap between the proposals of the Expert Group on Decision 482 and the cost recovery requirements for satellite network filings that need to be recovered, as assessed in document [C25/64](https://www.itu.int/md/S25-CL-C-0064/en).  **Relevant link(s) with the Strategic Plan**  Universal connectivity; Spectrum for Space and Terrestrial Services; Development and application of the ITU Administrative Regulations; Allocation and management of resources.  **Financial implications**  The financial impact of the modifications to Decision 482 (C01, last amended C24) that are proposed by the Expert Group are assessed to be **CHF 1 955** **986** based on 2023 data, i.e. a 17.4% increase compared to what has been invoiced that year (CHF 11 215 321).  In document [C25/64](https://www.itu.int/md/S25-CL-C-0064/en), the secretariat has made a proposal to limit the full costs of satellite network cost recovery to CHF 18 032,400. In order to recover this amount, it would be necessary to increase all of the fees proposed in document [C25/10](https://www.itu.int/md/S25-CL-C-0010/en) by around 37%.  **References**  *Council* [*Decision 482*](https://www.itu.int/md/S24-CL-C-0135/en) *(C01, last amended C24), Council Documents* [*C25/10*](https://www.itu.int/md/S25-CL-C-0010/en),[*C25/16*](https://www.itu.int/md/S25-CL-C-0016/en) *and* [*C25/64*](https://www.itu.int/md/S25-CL-C-0064/en) | |

**1. Outcome of the fourth meeting of the Council Expert Group on Decision 482**

The fourth meeting of the Council Expert Group on Decision 482 took place on 10th and 11th April 2025 and completed the report of the Group to the 2025 session of Council.

Under the able leadership of Ms. Cheng, Chair of the Expert Group, all ten items of the Terms of Reference (see [Decision 632](https://www.itu.int/md/S23-CL-C-0126/en) of Council) were reviewed to consider possible modifications to Council Decision 482 (C-24). Agreement leading to increases in cost recovery was reached on seven items (b, d, e, f, g, h, i of the Terms of Reference). In particular, the consideration of two key items related to non-geostationary systems (items f and g of the Terms of Reference) led to specific proposals of revisions of Decision 482 aimed at better taking into account the workload generated by such systems.

The Group also concluded that no change should be made to Decision 482 in reply to two items (a and j of the Terms of Reference) and that item c of the Terms of Reference should be reviewed when more data and experience are available.

**2. Analysis of the outcome of the 4th meeting of the Expert Group on Decision 482**

The financial impact of the agreed modifications was assessed based on the submissions invoiced in 2023. As a reminder and as indicated in document [C25/16](https://www.itu.int/md/S25-CL-C-0016/en), in 2023, the total invoiced amount (minus the free entitlements) was CHF 11 215 321 and the full costs were estimated at CHF 19 438 401. In document [C25/64](https://www.itu.int/md/S25-CL-C-0064/en), the Secretariat has made a proposal to limit the full costs of satellite network cost recovery to CHF 18 032 400.

Simulating the financial impact of the proposals on the invoices issued in 2023, the estimated additional revenue from the proposals for modifications to Decision 482 (C24) agreed by the Expert Group would be **CHF 1 955** **986** as detailed in the table below.

In order to achieve recovery of the proposed full cost limit of CHF 18 032 300, it would be necessary to increase all of the fees proposed in document [C25/10](https://www.itu.int/md/S25-CL-C-0010/en) by around 37% (see the [annex](#Annex) of this document for a proposal of a revised Annex of Decision 482 implementing such an increase).

**It is important to note, however:**

1. Any deterring effect of the proposed revisions to Decision 482 on the submission of very large filings has not been considered.
2. The impact of item b) (limits on free filings taking into account the change in the equation for computing units) is taken into account in the computation of the differential impact of other items, since item b) ensures that invoices for submissions that generate more work do not benefit from the free entitlement.

|  | **Total estimated impact based on 2023 data (CHF)** | **Geostationary satellite networks** | **Non-geostationary satellite systems** |
| --- | --- | --- | --- |
| Differential impact of item d) (additional fees on resubmissions of notification with modified technical characteristics) | 34 750 | 34 750 | - |
| Differential impact of item e) (Post-notification activities for geostationary satellite networks, categories N1 to N3) | 436 740 | 436 740 | - |
| Differential impact of items e) and f) (Change in the equation for computing units and additional fees above 75 000 units for notifications of non-geostationary satellite systems as well as post-notification activities, categories N1 to N3) | 200 982 | - | 200 982 |
| Differential impact of item f) (Change in the equation for computing units and additional fees above 75 000 units for coordination requests of non-geostationary satellite systems, categories C1 to C3) | 151 951 | - | 151 951 |
| Differential impact of item g) (API, category A1) | 791 907 | 43 632 | 748 275 |
| Differential impact of item g) (Notifications of systems not subject to coordination, category N4) | 64 148 | -740 | 64 888 |
| Differential impact of item g) (Notifications of systems subject only to No. **9.21**, proposed new category N5) | 22 328 | - | 22 328 |
| Differential impact of item h) (epfd examination costs) | 201 600 | - | 201 600 |
| Differential impact of item i) (additional examination in the Space Plans) | 51 580 | 51 580 | - |
| **Total differential impact** | **1 955 986** | **565 962** | **1 390 024** |

ANNEX[[1]](#footnote-2)

Schedule of processing charges to be applied to satellite network filings   
received by the Radiocommunication Bureau on or after [DD/MM/YYYY]

| Type | | Category | | Flat fee per filing (in CHF) ( 100 units,  if applicable)e) | | Start fee per filing (in CHF) (< 100 units) | Fee per unit (in CHF) (< 100 units) | Cost-recovery unit | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| 1 | Advance publication (A) | A1 | Advance publication of a non-geostationary-satellite network not subject to coordination under Section II of Article **9**; Advance publication of inter-satellite links of a geostationary-satellite space station communicating with a non-geostationary space station provisionally not subject to coordination under Section II of Article **9** in accordance with the Rule of Procedure on No. **11.32**, § 6 (MOD RRB04/35).  Note: Advance publication also includes the application of No. **9.5** (API/B special section) and will not be separately charged.  Note: For advance publication information of a non-geostationary satellite network where the notifying administration has indicated that the different sub-sets of orbital characteristics would be mutually exclusive, the processing charges are separately computed for each of the sub-sets and thereafter added to produce the processing charge of the satellite network. |  | | |  | | |
| 7 809  [5 700] | | 411  [300] | 74  [54] | Product of the number of frequency ranges, number of classes of station, number of emissions and a multiplier in footnote f), summed up for all frequency assignment groups | |
| 2 | Coordination (C)g) | C1\* | Coordination request for a satellite network in accordance with No. **9.6** along with one or more of Nos.  **9.7**, **9.7A**, **9.7B**, **9.11**, **9.11A**, **9.12**, **9.12A**, **9.13**, **9.14** and **9.21** of Section II of Article **9**, § 7.1 of Article 7 of Appendix **30**, § 7.1 of Article 7 of Appendix **30A** and Resolution **539 (Rev.WRC-19)**.  Note: Coordination also includes the application of Nos. **9.1A**, **9.53A** (CR/D special section) and **9.41**/**9.42** and will not be separately charged.  Note: For coordination requests of a non-geostationary satellite network where the notifying administration has indicated that the different sub-sets of orbital characteristics would be mutually exclusive, the processing charges are separately computed for each of the sub-sets and thereafter added to produce the processing charge of the satellite network. | 28 167  [20 560] | | 7617  [5 560] | 205.5  [150] | Product of the number of frequency assignments, number of classes of station, number of emissions and a multiplier in footnote f), summed up for all frequency assignment groups | |
| C2\* | 33 729  [24 620] | | 13 179  [9 620] |
| C3\* | 45 850  [33 467] | | 25 300 [18 467] |
| 3 | Notification (N)a), h) | N1\*d) | Notification for recording in the MIFR of frequency assignments to a satellite network subject to coordination under Section II of Article **9** (with the exception of non-geostationary-satellite network subject to No. **9.21** only).  Note: Notification also includes the application of Resolutions **4** and **49**, Nos. **11.32A** (see footnote *a)*), **11.41**, **11.47**, **11.49**, Sub‑section IID of Article **9**, Sections 1 and 2 of Article **13**, Article **14** and will not be separately charged.  Note: The first resubmission of notices in categories N1, N2, and N3 which includes new technical characteristics, under No. **11.46**, shall be charged an additional fee of CHF 25 400 [CHF 18 540], CHF 47 608 [CHF 34 750], and CHF 47 608 [CHF 34 750] respectively, to cover the examination and processing of the resubmission. | 50 816  [37 092] | | 26156  [19 092] | 246.6  [180] |
| N2\* | 95 220  [69 504] | | 70 560  [51 504] |
| N3\* | 95 220  69 504 | | 70 560  51 504 |
| N4 | Notification for recording in the MIFR of frequency assignments to a satellite network not subject to coordination under Section II of Article **9**. |  | | |  | | |
| 16 851 [12 300] | 8 631 [6 300] | | 82.2 [60] | | [*Editor’s note: same description as for categories N1 to N3. To be merged once revisions marks are approved.*] |
| N5 | Notification for recording in the MIFR of frequency assignments to a non-geostationary satellite network or system subject to No. **9.21** only. | 24 112 [17 600] | 12 330 [9 000] | | 117.8 [86] | |
| 4 | Plans (P) | P1 | Part A Special Section for a proposed new or modified assignment in the Regions 1 and 3 List or feeder-link Lists of additional uses under § 4.1.5 or proposed modification to the Region 2 Plans under § 4.2.8 of Appendices **30** or **30A**; or Part B Special Section for a proposed new or modified assignment in the Regions 1 and 3 List or feeder-link Lists of additional uses under § 4.1.15 (except Part B special section related to the application of Resolution **548 (Rev.WRC-12)**) or proposed modification to the Region 2 Plans under § 4.2.19 of Appendices **30** or **30A**b).  Note: for Part B Special Sections for which a further examination under Note 7*bis* of § 4.1.12 of Appendix **30**, Note 16bis of § 4.2.16 of Appendix **30**, Note 9*bis* of § 4.1.12 of Appendix **30A**, Note 19*bis* of § 4.2.16 of Appendix **30A** is required, an additional fee of 9 888 [7 217.50] CHF is applicable. | 39 552 [28 870] | | | Not applicable | | |
| P2d) | Notification for recording in the MIFR of frequency assignments to space stations in the broadcasting-satellite service and its associated feeder-link in Regions 1 and 3 or Region 2 under Article 5 of Appendices **30** or **30A**b). | 15 824 [11 550] | | |
| P3 | Coordination request in accordance with Article 2A of Appendices **30** and **30A**. | 16 440 [12 000] | | |
| P4 | Request for the conversion of an allotment into an assignment with modification which is beyond the envelop characteristics of the initial allotment, or for the introduction of an additional system, or for the modification of an assignment in the List in accordance with § 6.1 of Article 6 of Appendix **30B**; or request for inclusion of assignments into the List for converted allotment with modification which is beyond the envelop characteristics of the initial allotment, or for an additional system or for modified assignments in the List in accordance with § 6.17 of Article 6 of Appendix **30B**c); or request for assignments to Appendix **30B** ESIM in accordance with § 1 of Section A of Part 1 in Annex 1 of Resolution **121 (WRC-23)**; or request for inclusion of assignments to Appendix **30B** ESIM into the Appendix **30B** ESIM List in accordance with § 11 of Section A of Part 1 in Annex 1 of Resolution **121 (WRC-23)**.  Note: for Part B Special Sections for which a further examination under Note 7*bis* of § 6.21 *c)* of Appendix **30B** is required, an additional fee of CHF 8 682 [6 337.50] is applicable. | 34 730 [25 350] | | |
| P5d) | Notification for recording in the MIFR of frequency assignments to space stations in the fixed satellite service under Article 8 of Appendix **30B** or of frequency assignments to Appendix **30B** ESIM under Section B of Part 1 in Annex 1 of Resolution **121 (WRC‑23)**. | 27 784 [20 280] | | |

a) Fees for Categories N1, N2 and N3 are applicable to the first notification of assignments that also contains a request to apply No. **11.32A**. If the application of No. **11.32A** is not requested, 70% of the indicated fees will apply, with the remaining 30% to be charged to a subsequent request, if any, for application of No. **11.32A**.

b) Under this category, taking account that a filing for the broadcasting-satellite service and its associated feeder link in Region 2 includes both the downlink (Appendix **30**) and the feeder link (Appendix **30A**), which are examined and published together, the total fee application to such filing shall be twice the fee indicated in the column “Flat fee per filing”.

c) Fees for a request in accordance with § 6.17 of Article 6 of Appendix **30B**also contains a possible subsequent request (resubmission) in accordance with § 6.25. A request in accordance with § 6.17 of Article 6 of Appendix **30B**for a submission treated as that under § 6.1 in accordance with § 7.7 of Article 7 shall not be charged.

d) For cases of consolidation of frequency assignments in the MIFR of different GSO networks submitted by an administration (or an administration acting on behalf of a group of named administrations) under Article **11** of the Radio Regulations, category N1 shall apply, for cases submitted under Appendices **30** or **30A**, category P2 shall apply, and for cases submitted under Appendix **30B**, category P5 shall apply.

e) For non-geostationary satellite networks, the flat fee for categories A1, C1, C2, C3, N1, N2, N3, N4 and N5 is applicable from 100 units to 25 000 units. From 25 000 units to 75 000 units, there is an additional fee per additional unit, equal to the flat fee divided by 50 000. Above 75 000 units, there is an additional fee per additional unit, equal to the flat fee divided by 400 000.

f) The multiplier for each frequency group shall be the sum of factors A and B but not less than 1, factor A being 80% of the number of sets of orbital planes associated with the group under consideration, factor B being 20% of the mean number of satellites per set of orbital planes associated with the group under consideration divided by 1 000 and rounded up. For the purposes of Decision 482, two orbital planes are in the same set if they have the same value of apogee, perigee, angle of inclination and, in the case of non-circular orbits, the same value of the argument of the perigee.

g) For categories C1 to C3, each filing subject to Nos. **22.5C**, **22.5D**, **22.5F** and **22.5L** is subject to an additional fee of 4 384 [3 200] CHF per examination scenario. The number of examination scenarios corresponds to those submitted by the notifying administration in accordance with Appendix **4** of the Radio Regulations and using the latest version of the BR SpaceCap software.

h) For categories N1 to N3, each filing subject to Nos. **22.5C**, **22.5D**, **22.5F** and **22.5L** is subject to an additional fee of CHF 4 384 [3 200] per examination scenario only if the examination scenario contains modified or new parameters compared to the corresponding CR/C filing.

**\* Definition of category for coordination (C) and notification (N)**

The category for coordination (C1, C2, C3) and for notification (N1, N2, N3) is related to the number of forms of coordination applicable to a particular satellite network coordination request or notification submission, as follows:

• C1 and N1 correspond to a satellite network filing referring to only one cost-recovery form of coordination (A, B, C, D, E or F). Both categories also include cases for which no form of coordination applies as a result of unfavourable finding under No. **11.31** of the Radio Regulations for all frequency assignments of the submitted filing, or cases including frequency assignments published for information only.

• C2 and N2 correspond to a satellite network filing referring to any two or three cost recovery forms of coordination amongst A, B, C, D, E or F.

• C3 and N3 correspond to a satellite network filing referring to any four or more cost recovery forms of coordination amongst A, B, C, D, E or F.

|  |  |
| --- | --- |
| Cost-recovery form of coordination | Individual Radio Regulations forms of coordination |
| A | No. **9.7** |
| B | Appendix **30** 7.1, Appendix **30A** 7.1 |
| C | No. **9.11**, Resolution **539** |
| D | Nos. **9.7B, 9.11A**, **9.12, 9.12A**, **9.13**, **9.14** |
| E | No. **9.7A[[2]](#footnote-3)4** |
| F | No. **9.21** |

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1. Figures in square brackets are those contained in document [C25/10](https://www.itu.int/md/S25-CL-C-0010/en). [↑](#footnote-ref-2)
2. 4 Cost recovery for category C1 only. See also *decides* 11. [↑](#footnote-ref-3)