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|  | **Document EG-DEC482-3/2** |
| **10 January 2025** |
| **English only** |
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| Report by the Secretary-General | |
| ADDITIONAL DATA AND INFORMATION ON PROCESSING OF SATELLITE NETWORK FILINGS | |
| **Purpose**  This document provides an update to the document of the data on processing of satellite network filings based on the comments and requests received during the second meeting of the Expert Group.  **Action required**  The Expert Group on Decision 482 is invited to **take into account** the information contained in this document in its work on the revision of Decision 482.  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  **References**  [*EG-DEC482 website*](https://www.itu.int/en/council/Pages/eg-d482.aspx)*;* [*Data on processing of satellite network filings*](https://www.itu.int/md/S24-EG2DEC482-C-0003/en)*;* [*Final Report of the second meeting of the Council Expert Group on Council Decision 482*](https://www.itu.int/md/S24-EG2DEC482-C-0004/en) | |

a) In the case of non-receivable filings, the appropriateness or otherwise of charging a fraction of the amount of an equivalent receivable filing for such cases, taking into account the needs of developing countries

Request from the second meeting of the Expert Group: *The Group requested that the Bureau explain where the above-mentioned percentage comes from and how much the fee could be increased by charging a fraction of the amount of an equivalent receivable filing for non-receivable filings.*

Information provided in response to the Expert Group’s request:

As it was noted during the first meeting of the Council Expert Group during the period 2018-2022 and reiterated in the introduction of Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en), “the use of an individual staff tracking mechanism for processing satellite network filings was implemented in the early 2000 but finally abandoned in 2005”. As such, the information about percentages of work is based on internal assessment by the Radiocommunication Bureau.

Non-receivable filings are determined so after the end of the completeness check, which could be estimated by the following percentage of the total work of processing a submission:

 Advance publication of information (API): 85%

 Coordination request (CR/C): 50%

 Notification in non-planned bands: 60%

 Space Plans[[1]](#footnote-2):

– RR Appendices **30** and **30A**: Part A 30%, Part-B 60%, Notification 30%, Article 2A 30%

– RR Appendix **30B**: Part-A 30%, Part-B 40% and Notification 30%

If the above percentages would have been charged for non-receivable filings during the period 2020-2023, the following amounts would have been invoiced:

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| Special sections | API | CRC | | Notification | | Total |
| GSO | Non-GSO | GSO | Non-GSO |
| 2020 | 5 814.00 CHF | - | 13 370.00 CHF | 30 910.00 CHF | - | 50 094.00 CHF |
| 2021 | 2 907.00 CHF | 5 860.00 CHF | 13 670.00 CHF | - | 37 940.00 CHF | 60 377.00 CHF |
| 2022 | 969.00 CHF | - | 65 740.00 CHF | - | 14 060.00 CHF | 80 769.00 CHF |
| 2023 | 1 453.50 CHF | - | 61 400.00 CHF | - | 7 030.00 CHF | 69 883.50 CHF |
| Total | 11 143.50 CHF | 5 860.00 CHF | 154 180.00 CHF | 30 910.00 CHF | 59 030.00 CHF | 261 123.50 CHF |

Request from the second meeting of the Expert Group: *Additionally, in cases of non-receivability, the Group noted the need for further study to determine whether using the date of submission, rather than the date of receipt for the amendment to the Annex to Council Decision 482 is appropriate.*

Information provided in response to the Expert Group’s request:

Cases of non-receivability can procedurally fall into two categories: either the receivability examination performed by the Radiocommunication Bureau concludes that the submission is not receivable, or this examination indicates that the submission is incomplete and the Bureau requests additional information or clarification within 30 days.

Noting that non-receivability can only be determined either following the return of the submission by the Bureau with an indication that it is not receivable or at the expiry of the 30-day period given by the Bureau to provide clarifications, it is suggested to use the dates of the return of submission or the date of expiry of the 30-day period as starting points for the invoicing process of such non-receivable or incomplete submissions. In cases of incomplete submissions for which the required clarifications would be provided after the expiry of the 30-day period, the remaining part of the fee would be due and the starting date of this second part of the invoicing process would be the date of reply to the Bureau’s query.

See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for a possible implementation of the above suggestions.

b) Whether there are categories of filings for non-GSO satellite systems that, due to their complexity, should not be eligible for free entitlement

Request from the second meeting of the Expert Group: *The Group noted the importance of maintaining the current free entitlement mechanism but considering certain limitations imposed on filings eligible for exemption from charges. The Group requested that the Bureau suggest, for the next meeting, possible amendments to the Council Decision 482 to indicate that filings related to “large non-GSO satellite systems” will not be eligible for free entitlement.*

See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en).

Request from the second meeting of the Expert Group: *Additionally, the Bureau is asked to describe which types of non-GSO should be considered as “large non-GSO satellite systems”.*

Information provided in response to the Expert Group’s request:

Noting that the intent of this item is to recover the costs of submissions requiring a lot of ITU resources, non-GSO satellite systems meeting at least one of the three following criteria should be considered as *“large non-GSO satellite systems”* andbe excluded from eligibility for free entitlement because they each require substantially higher resources to be processed:

 non-GSO satellite systems with more than 25 000 units;

 non-GSO satellite systems containing two or more mutually exclusive configurations;

 non-GSO satellite systems subject to epfd limits of Article **22** of the Radio Regulations.

c) Whether specific fees should be paid for processing submissions related to earth stations in motion, while avoiding double invoicing

Request from the second meeting of the Expert Group: *The Group requested that the Bureau reassess the workload involved in processing ESIM notices submitted under Resolutions* ***121 (WRC-23)****,* ***123 (WRC-23)****, and* ***169 (Rev.WRC-23)****, with a view to fully implementing the Resolutions in their entirety. It was noted that the comprehensive implementation of these Resolutions and their annexes entails a workload that exceeds that of processing a single space notice.*

Information provided in response to the Expert Group’s request:

The workload involved in the processing of ESIM notices from submission until publication of the special section was described in section c) of Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en).

However, Resolutions **121 (WRC-23)** and **123 (WRC-23)** alsocontain provisions in the event that unacceptable interference is reported, which would add to the overall implementation workload of the Bureau, should it occur. Noting that these provisions are applied only in cases of the actual occurrence of unacceptable interference and the lack of experience since they have only entered into force on 1st January 2025, it is difficult to estimate the workload associated with such provisions and to compute a corresponding fee that would be added to the processing costs of every such submission.

Alternatively, the Expert Group may wish to consider a mechanism by which a fee is paid only in cases where unacceptable interference is actually caused.

d) The cost of processing resubmissions of notification requests.

No specific additional information was requested under this item. See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

e) The costs associated with the BR’s implementation of additional provisions: Resolutions 4 (Rev.WRC-03) and 49 (Rev.WRC-23), and RR Nos. 11.32A, 11.41, 11.47, 11.49, Subsection IID of Article 9, Sections 1 and 2 of Article 13, Article 14

Request from the second meeting of the Expert Group: *(…) The Group requested that the Bureau provide, if possible, more information about the workload (…).*

Information provided in response to the Expert Group’s request:

The workload associated with the BR’s implementation of additional provisions like Resolutions **4 (Rev.WRC-03)** and **49 (Rev.WRC-23)**, and Nos. **11.32A**, **11.41**, **11.47**, **11.49**, Subsection IID of Article **9**, Sections I and II of Article **13**, Article **14** is described in section e) of Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en). However, some of these provisions only apply to certain filings or when they are explicitly requested by administrations.

The table below aims to provide more information on the workload related to these provisions for any given filing and provides further elements to justify why notifications under categories N1 to N3 entail much more work than under category N4. It also provides additional justification about the need to distinguish between notifications of satellite networks or systems not subject to coordination and those of satellite networks or systems subject to RR No. **9.21** only.

| Type of notification | Performed by the Radiocommunication Bureau if some conditions are met | Performed only if there is a specific request from the administration |
| --- | --- | --- |
| Satellite networks or systems subject to coordination (except those subject to RR No. **9.21** only) (categories N1 to N3) |  Bringing into use, bringing back into use, Resolution **40**, suspension, extension of the period of validity   Application of RR No. **13.6**   Resolution **35**   Implementation of RR No. **11.41A**   Suppression of frequency assignments |  Assistance under Sub-Section IID of Article **9**   Objection to coordination agreement after publication of Part I-S   Implementation of RR No. **11.41B**   Application of RR No. **23.13**   Assistance under RR Nos. **13.1** to **13.3**   Application of No. 13.6 |
| Satellite networks or systems subject to No. **9.21** only (current category N4) |  Bringing into use, bringing back into use, suspension, extension of the period of validity   Application of RR No. **13.6**   Suppression of frequency assignments |  Objection to agreement after publication of Part I-S   Application of RR No. **23.13**   Assistance under RR Nos. **13.1** to **13.3**   Application of RR No. **13.6** |
| Satellite networks or systems not subject to coordination (current category N4) |  Bringing into use, bringing back into use, suspension, extension of the period of validity   Application of RR No. **13.6**   Suppression of frequency assignments |  Application of RR No. **23.13**   Assistance under Assistance under RR Nos. **13.1** to **13.3**   Application of RR No. **13.6** |

See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

f) The costs of processing non-GSO filings having more than 75 000 units or, alternatively, whether the formula to compute units for such non-GSO satellite systems should take into account the impact of the number of different orbital altitudes, number of satellites, number of earth stations, or other characteristics affecting workload associated with the processing of non-GSO systems

Request from the second meeting of the Expert Group: *(…) The Group requested that the Bureau add a description of the more complex and larger non-GSO systems in the update to the document (…).*

Information provided in response to the Expert Group’s request:

As indicated in section b), there are three types of more complex and larger non-GSO systems:

 Those with different sets of orbital parameters and different applicable forms of coordination per frequency range: the impact of these parameters on the processing of the filings is explained in section e) of Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en). A revision of the description of cost recovery units would be required to insert into Decision 482 these additional parameters.

 Those containing several mutually exclusive configurations: this is possible only at the coordination stage and has been previously addressed by the Council by revising Decision 482 to indicate that each mutually exclusive configuration needs to be charged separately. Apart from excluding such filings from free entitlement (see section b)), no further revision of Decision 482 is needed.

 Those subject to epfd limits of Article **22** of the Radio Regulations: the examination of compliance with epfd limits requires additional resources that make these types of filings more complex to process. This case is dealt with under item h).

See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

g) Consider the introduction of units in categories A1 and N4, with a different fee being charged for more complex or larger systems, depending on the number of units

Request from the second meeting of the Expert Group: *(…) The Group requested that the Bureau update data related to time spent in processing of these satellite filings in the relevant statistic (…).*

Information provided in response to the Expert Group’s request:

The table below is extracted from section g) of Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en).

|  |  |  |  |
| --- | --- | --- | --- |
|  | Total examination time  (days) | Number of satellite  networks or systems | Average time  (days) |
| GSO | 24 210 | 242 | 100.0 |
| Non-GSO subject to coordination | 3 314 | 29 | 114.3 |
| + epfd | 634 | 4 | 158.5 |
| Non-GSO not subject to coordination | 11 719 | 353 | 33.2 |
| Not around Earth | 887 | 25 | 35.5 |
| **9.21** | 476 | 10 | 47.6 |

The table below provide more detailed information about the examination time of notifications.

|  |  |  |  |
| --- | --- | --- | --- |
|  | Minimum examination  time  (days) | Median examination  time  (days) | Maximum examination  time  (days) |
| GSO | 6 | 79 | 898 |
| Non-GSO subject to coordination | 21 | 65 | 558 |
| + epfd | 65 | 143 | 283 |
| Non-GSO not subject to coordination | 3 | 22 | 288 |
| Not around Earth | 13 | 28 | 98 |
| 9.21 | 8 | 44 | 97 |

See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

h) An additional fee for recovering the costs of epfd examination of coordination requests and notifications

No specific additional information was requested under this item. See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

i) Consequences of modifications introduced by any WRC after WRC-2000, if any, to regulatory provisions governing the Space Plans

No specific additional information was requested under this item. See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for the suggested amendments to Decision 482.

j) The cost of dedicated resources needed to continually update and modernize the Bureau software applications used for satellite filings. However, satellite cost recovery should not be used to fund the development of software tools for processing terrestrial filings

No specific additional information was requested under this item. See Document [EG-DEC482-3/3](https://www.itu.int/md/S25-EG3DEC482-C-0003/en) for a discussion about the importance of properly including the required resources in the ITU Financial Plan and budgets.

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1. Concerning notices in RR Appendices **30**, **30A** and **30B**, the last case where a notifying administration did not reply to the completeness letter was in 2017. The estimated percentage of the workload of processing completeness in the three Appendices is computed as the percentage of work related to registration, pre-examination and completeness compared the overall processing tasks of registration, pre-examination and completeness, examination, publication, database update, multi-fax and reminders. [↑](#footnote-ref-2)