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|  | **Document EG-DEC482-4/4** |
| **28 March 2025** |
| **English only** |
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| Contribution by France, Germany, Montenegro | |
| REVIEW OF *REVISION 2 TO DOCUMENT EG-DEC482-2/DT/3* | |
| **Purpose**  France, Germany and Montenegro provide observations, comments and proposals on the document *Revision 2 to Document EG-DEC482-2/DT/3*.  **Action required**  The Expert Group on Decision 482 is invited to **consider** this document. | |

We present hereafter our views on each of the items that the Expert Group has to examine according to the Council Decision. It is recognized that the mandate of the group is limited to technically understand and validate the formula and calculation process taking into account the new role played by NGSO constellations. Costs and Budget issues themselves are out of scope and to be discussed at Council level.

We are of the view that any discussion that would suggest a reconsideration of the Resolution 91 about the indirect and direct costs is out of the scope of the Expert Group on Decision 482. Such consideration has to be limited to ITU-Council preparation.

Following the third meeting of the Expert Group on Decision 482, held on 10 and 11 February 2025, and the associated report from the Secretary (Document [CWG-FHR-20/29](https://www.itu.int/md/S25-CWGFHR20-C-0029/en)), it is noted that an agreement leading to increases in cost recovery was reached for only four items (b, e, h, and i of the Terms of Reference). Several key items related to non-geostationary systems (items f and g of the Terms of Reference) remain unresolved. The Secretariat document states that no changes should be made to Decision 482 in response to two items (a and j of the Terms of Reference) and that no changes can be proposed at this stage in response to item c).

We consider that the decisions related to items c) and d) remain unclear and that the status of item d) was not included in the Secretariat's report.

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| 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  Relevant part of the outcome of the second meeting of the Expert Group: *(…) 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.*  Possible amendments to Council Decision 482: This item could be implemented into a revised Decision 482 by adding a new *decides* 2o) and a footnote giving the proposed percentage of fees to be invoiced for cases of non-receivable filings, according to the same categories listed in the Annex to the Decision 482. A possible example of such implementation is given in the Annex of this document.  See Document [EG-DEC482-3/2](https://www.itu.int/md/S25-EG3DEC482-C-0002/en) for background information on the proposed suggestions. |
| We agree with the proposal of the Bureau. |

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| b) Whether there are categories of filings for non-GSO satellite systems that, due to their complexity, should not be eligible for free entitlement  Possible amendments to Council Decision 482: This item could be implemented into a revised Decision 482 by inserting exceptions for “large non-GSO satellite systems” to the free entitlement mechanism in *decides* 4. A possible example of such implementation is given in the Annex of this document. See Document [EG-DEC482-3/2](https://www.itu.int/md/S25-EG3DEC482-C-0002/en) for information about which types of non-GSO should be considered as “large non-GSO satellite systems”.  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. |
| We agree that large non-GSO satellite systems as defined by the BR should not be eligible for the current free entitlement filing per administration.  We agree with the principles of the Bureau. |

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| c) Whether specific fees should be paid for processing submissions related to earth stations in motion while avoiding double invoicing  *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*  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. |
| We agree that the proper words for this item ***is the cost recovery for the submission of a space station to which associated earth stations in motion (ESIM)*** and charges as for a single space notice is adequate.  We are of the view that interference resolution cannot be subject to cost recovery, in particular when the interfering system is compliant with the RR. |

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| d) The cost of processing resubmissions of notification requests.  Relevant part of the outcome of the second meeting of the Expert Group: *During the meeting, concerns were expressed about the idea of charging each resubmission separately. The possibility of charging resubmissions, particularly those with modified technical characteristics, which lead to a lot of workload, was discussed. The Group requested that the Bureau suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 to address this issue. The possible amendments would introduce an additional fee for notices that are likely to be resubmitted under RR No.* ***11.46****, to be included in the first notification fee, thereby reducing the need for multiple invoices.*  Possible amendments to Council Decision 482: Notifications under categories N1 to N3 (i.e. those related to satellite systems subject to coordination) are those susceptible to be resubmitted under No. **11.46** since examination under Nos. **11.32** and **11.32A** applies only to these cases. It is therefore proposed to add a note in the description of these three categories indicating that an additional fee equal to 80% of the initial fee will be charged for these categories. This percentage takes into account the fact that some notifications may be resubmitted twice (i.e. after unfavourable findings under No. **11.32** and after unfavourable findings under No. **11.32A**) and assumes that resubmissions may contain modified technical parameters. The value of 80% is an average between different cases of resubmissions (i.e. with or without modified technical parameters, updating information on coordination agreements or not, applying No. **11.32A** or not) in order to avoid the need for multiple invoices as requested by the Expert Group. |
| We are concerned with an additional increase of 80% for all N1 to N3 submissions, which will result in N2 and N3 notifications fee of over CHF 125K for one GSO network. The Bureau has not fully justified the 80% increase or provided sufficient granularity in its information for administrations to propose alternative percentages if any. It would be useful for the Bureau to provide a list of the filings notified in 2024 and indicate how many of these included modified technical parameters, which seems to be the driving factor for this very high fee.  At this stage we do not support the inclusion of the proposed note by the Bureau.  We disagree with the arguments expressed in the group that multiple invoices have to be avoided, and each resubmission should be charged individually.  We are of the view that finalisation of coordination is nowadays not feasible at 100% in 7 years period and one first resubmission is almost systematic.  We propose to limit the overall increase of question d) from 80% to only 20% (this 20% increase is the one already contained in item e) below) including the first resubmission. Each additional resubmission with modification of technical parameters may imply an additional cost of 60% and a new invoice. We are also of the view that additional resubmission should only be subject to cost recovery when the resubmission is a request from the notifying administration. Resubmission requests by the Bureau to align some parameters should be exempt of cost recovery.  Resubmission without modification of the technical parameters should be exempt of additional cost recovery. |

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| e) The costs associated with the BR’s implementation of additional provisions: Resolutions 4 (Rev.WRC-03) and 49 (Rev.WRC-23), Nos. 11.32A, 11.41, 11.47, 11.49, Subsection IID of Article 9, Sections 1 and 2 of Article 13, Article 14  Relevant part of the outcome of the second meeting of the Expert Group: *The Group noted that charging a separate fee for each provision should be avoided and that assistance to developing countries should not be charged. The Group also discussed whether it is necessary to increase the fee for notification considering that the current fee for notification is already high. The Group requested that the Bureau (…) suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 to address this issue. The possible amendments could introduce an additional fee, ranging from 10% to 30% of the first notification fee, taking into account that certain provisions, such as Resolution* ***49*** *or Resolution****35****, are not applied to all notifications.*  Possible amendments to Council Decision 482: It is suggested to increase the starting fee and the flat fee of categories N1 to N3 by 20% compared to the value of 2005 (i.e. the one currently contained in the Annex to Decision 482). These categories relate to the notification of satellite networks and systems that are subject to coordination, which are also those linked with the application of most of the additional provisions decided by WRCs since 2005.  See also document [EG-DEC482-3/2](https://www.itu.int/md/S25-EG3DEC482-C-0002/en). |
| The proposal to increase the Notification fees by 20% does not seem unreasonable at first glance, however it is noted that the current Decision 482 already indicates that the current fee “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.” Therefore, it is not totally clear what additional work the Bureau needs to undertake under the stated provisions that would require such an increase in the fee structure. We view this paragraph and d) as related since the N1 to N3 filings would be impacted twice and seem to cover some of the same provisions.  (…)  Other matters  Given the significant impact of fees being proposed, we are of the view that the filings subject to these fees should be those submitted after 1 January 2026. Budgets for 2025 have been established and applying new fees may impact planned ITU filings.  We agree with the 20% increase for N1, N2 and N3 accepted at the last meeting. |

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| 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  Relevant part of the outcome of the second meeting of the Expert Group: *The Group requested that the Bureau (…) suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 revising the ceilings, in particular that of 75 000 units and also reconsidering the methodology for calculating units for non-GSO satellite systems.*  Possible amendments to Council Decision 482: Ceilings in the fee structure inherently create difficulties to properly recover the costs associated with the processing of filings having more units than the threshold value corresponding to the ceiling, because adding units beyond the threshold level does not result in increased fees. In order to minimize this issue, while also keeping a cap on cost recovery invoices, it is suggested to raise the threshold number of units at which the fee ceiling starts from 75 000 to 500 000 (noting that the maximum number of units for a given satellite system received by the Bureau had reached 485 640 in previous years). See suggested modification of note e) in the Annex of Decision 482.  Concerning the methodology for calculating units for non-GSO satellite systems, it is suggested to insert in the computation of units the number of different sets of orbital planes and the number of forms of coordination per frequency range (see Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en) for background information) in the description of the cost recovery unit for categories of coordination (C) and notification (N).  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”*:   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. |
| We disagree with a raise of the fee with the number of units above 25000 for satellite systems subject to Res 35 as during the EG 482 meeting the Bureau agreed satellite networks even with 500000 units did not change significantly the workload.  We agree with principles that large constellations satellite systems should be more charged when the number of set of configurations of orbitals characteristics or technical parameters increase significantly the workload of the Bureau (including submission of different set of power for the same assignments that force the Bureau to execute several calculations).  We disagree with the use of a set of orbital plans as a factor as it does not represent the way constellation is really deployed and would support to take the number of orbital positions (i.e. number of satellite) as an appropriate parameter with a factor to be defined.  We propose to use a multiplication factor to the number of units (with no modification to the definition of units) that represents slices of thousands of satellites: i.e. 1 for 0 to 1 000 satellites, 2 for 1 000 to 2 000 satellites, 3 for 2 000 to 3 000 satellites: and to apply the following formula:   * New number of units = current number of units x multiplication factor. * For new number of units > 25 000: Flat fee + (Flat fee / 50 000) \* (additional units – 25 000).  Above 500 000 units, there is no additional fee per additional unit. * Proposed coefficient of 50 000 to be discussed. |
| 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  Relevant part of the outcome of the second meeting of the Expert Group: *The Group noted that significant changes to the fee structure of the small satellite networks should be avoided when considering the introduction of units in categories A1 and N4. The Group requested that the Bureau (…) suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 to take account of the ideas set out above.*  Possible amendments to Council Decision 482: five suggested revisions are included in the Annex to this document as possible implementation of this item:   Concerning API (category A1), units are suggested to be introduced with a description similar to the revised description of units for non-geostationary satellite systems in categories C and N (see item f) but with the number of frequency assignments replaced by the number of frequency ranges since API contains frequency ranges instead of centre frequencies and without the number of forms of coordination per frequency range since API relates to satellite filing not subject to coordination.   In addition to the introduction of units in category A1, it is suggested to introduce a starting fee and a flat fee for API. Assuming that the threshold value of units to start the flat fee is 100 as in all other categories, the value of the flat fee takes into account the fact that about 5% of the API will have more than 100 units (see Doc. [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en) for background information) and require significantly higher resources to be processed. The value of the starting fee is lower than the current flat fee since very simple API are less costly to process.   Concerning notifications under category N4, units are also introduced by using the same description as for categories N1 to N3 since frequency assignments also exist for notifications.   In addition to the introduction of units in category N4, it is suggested to introduce a starting fee and a flat fee set at about 33% of those for category N1 (see Doc. [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en) for background information) as updated under item e above. The value of the starting fee is lower than the current flat fee reflecting the fact that “small” notifications are less costly to process.   Concerning notifications under category N4, it is suggested to split this category into two and create a new category N5 for non-geostationary satellite networks or systems subject to No. 9.21 only. The fees for this new category would be set at about 47% of those for category N1 (see Document [EG-DEC482-2/3](https://www.itu.int/md/S24-EG2DEC482-C-0003/en) for background information) as updated under item e above.  See also Document [EG-DEC482-3/2](https://www.itu.int/md/S25-EG3DEC482-C-0002/en). |
| We agree with the proposal of the Bureau. |

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| h) An additional fee for recovering the costs of epfd examination of coordination requests and notifications.  Relevant part of the outcome of the second meeting of the Expert Group: *The Group requested that the Bureau suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 with the inclusion of additional processing charges to be applied to satellite networks or systems subject to epfd limits contained in Article* ***22*** *of the Radio Regulations considering the number of sets of validated epfd parameters and number of examination scenarios.*  Possible amendments to Council Decision 482: it is suggested to add a footnote to the categories of coordination (C) and notification (N), which would give the details of the additional processing charges, namely that a flat fee applies for filings with up to 7 examination scenarios, with an additional fee for each scenario beyond 7. The description of what constitutes a scenario is also described. A possible example of such implementation is given in the Annex of this document. |
| We agree with the proposal of the Bureau to charge 3 200 CHF per examination scenario. |

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| i) Consequences of modifications introduced by any WRC after WRC-2000, if any, to regulatory provisions governing the Space Plans  Relevant part of the outcome of the second meeting of the Expert Group: *The Group requested that the Bureau suggest, for the next meeting, possible amendments to the Annex to Council Decision 482 to introduce an additional fee for filings requiring further examination, set at half the fee for Part B.*  Possible amendments to Council Decision 482: it is suggested to add a note to categories P1 (for Appendices **30** and **30A**) and P4 (for Appendix **30B**) in order to indicate that, for Part B submissions for which a further examination is required, an additional fee equal to half the fee of the associated category is applicable. A possible example of such implementation is given in the Annex of this document. |
| We recognize that the workload of the Bureau may have been changed by decisions of the WRCs. We agree with the outcome of the last meeting that 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 6 337.50 CHF is applicable. |

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| 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.  Noting the conclusion of the Expert Group at its second meeting that “(…) the costs of updating or modernizing the software applications used for satellite filings cannot be included in the costs of satellite filings”, no suggested revision of Decision 482 is included with respect to this item.  As indicated by the Expert Group, it should however be noted that there is a “need for a clear and specific budget to be allocated for the implementation of WRC decisions, to avoid the need to request assistance from administrations or to dip into the existing budget”. |
| We support the view from the Bureau that resources for the upgrades of space software should be better identified.  We also well received explanations from the ITU that cost recovery go to the general budget and cannot be specifically pointed to one activity.  Nevertheless, we are of the view that country contribution also largely benefits to the upgrade of space software and note that some large companies notify through countries with a limited contribution with a large number of filings.  We are of the view that any discussion that would suggest a reconsideration of the Resolution 91 about the indirect and direct costs is out of the scope of the Expert Group on Decision 482. Such consideration has to be limited to ITU-Council preparation. |

ATTACHMENT

DECISION 482 (C01, last amended C25)

Implementation of cost recovery for satellite network filings

The ITU Council,

considering

*a)* Resolution 88 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference on the implementation of cost recovery for satellite network filings;

*b)* Resolution 91 (Rev. Guadalajara, 2010) of the Plenipotentiary Conference on cost recovery for some products and services of ITU;

*c)* Council Resolution 1113, on cost recovery for the processing by the Radiocommunication Bureau of space notifications;

*d)* Document [C99/68](http://www.itu.int/itudoc/gs/council/c99/docs/docs1/068.html) reporting on the Council Working Group on implementation of cost recovery for satellite network filings;

*e)* Document [C99/47](http://www.itu.int/itudoc/gs/council/c99/docs/docs1/047.html) on cost recovery for some ITU products and services;

*e bis)* Document [C05/29](http://www.itu.int/md/S05-CL-C-0029/en) on cost recovery for the processing of satellite network filings;

*f)* that WRC-03 and WRC-07 adopted provisions referring to Council Decision 482, as amended, under which a satellite network filing is cancelled if payment is not received in accordance with the provisions of this decision;

*g)* that WRC-07 significantly revised the regulatory procedures associated to the fixed‑satellite service Plan contained in Appendix **30B** that entered into force as of 17 November 2007;

*h)* that the date of entry into force of Decision 482 (modified 2005) was 1 January 2006,

recognizing

the practical experience of the Radiocommunication Bureau in implementing cost-recovery filing charges and the methodology as reported to the Council at its 2001 to 2007 sessions in accordance with Decision 482 as revised by the Council,

decides

1 that all satellite network filings concerning advance publication, their associated requests for coordination or agreement (Article **9** of the Radio Regulations (RR), Article 7of Appendices **30**/**30A** to the RR, Resolution **539 (Rev.WRC-19)**), the use of the guardbands (Article 2A to Appendices **30**/**30A** to the RR), requests for modification of the space service plans and lists (Article 4 of Appendices **30** and **30A** to the RR), requests for the implementation of the fixed-satellite service plan (former Sections IB and II of Article 6 of Appendix **30B** to the RR up to 16 November 2007), and requests for the conversion of an allotment into an assignment with modification which is beyond the envelop characteristics of the initial allotment, the introduction of an additional system, modification of the characteristics of an assignment in the List of Appendix **30B** to the RR (Article 6 of Appendix **30B** to the RR as from 17 November 2007) shall be subject to cost-recovery charges if, and only if, they have been received by the Radiocommunication Bureau on or after 8 November 1998;

1*bis* that all satellite network filings concerning notification for recording of frequency assignments in the Master International Frequency Register (Article **11** of the RR, Article 5 of Appendices **30**/**30A** to the RR and Article 8 of Appendix **30B** to the RR) received by the Radiocommunication Bureau on or after 1 January 2006 shall be subject to cost-recovery charges if, and only if, they refer to advance publication or modification of the space service plans or lists (Part A), requests for the implementation of the fixed-satellite service plan or requests for the conversion of an allotment into an assignment with modification which is beyond the envelop characteristics of the initial allotment, the introduction of an additional system, the modification of the characteristics of an assignment in the List of Appendix **30B** to the RR, as appropriate, received on or after 19 October 2002;

1*ter* that all requests for the implementation of the fixed-satellite service plan (former Sections IA and III of Article 6 of Appendix **30B** to the RR) shall be subject to cost-recovery charges if, and only if, they have been received by the Radiocommunication Bureau on or after 1 January 2006;

1*quater* that all requests for 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)at the same orbital position into frequency assignments of a single satellite network received by the Radiocommunication Bureau on or after 1 July 2013, shall be subject to cost recovery charges;

1*quinquies* that all requests submitted in accordance with Resolution **121 (WRC-23)** for using frequency assignments in the List of Appendix **30B** and in MIFR in support of the operations of an earth station in motion (Appendix **30B** ESIM) and received by the Radiocommunication Bureau on or after 1 January 2025, shall be subject to cost recovery charges;

2 that for each satellite network[[1]](#footnote-2) filing communicated to the Radiocommunication Bureau, the following charges[[2]](#footnote-3) shall apply:

a) for filings received on or after 1 September 2020, Decision 482 (C-20) applies; the fee, calculated in accordance with the fee schedule in force at the date of receipt, is payable after receipt of the notice;

b) for filings received on or after 1 July 2024, Decision 482 (C-24) applies; the fee, calculated in accordance with the fee schedule in force at the date of receipt, is payable after receipt of the notice;

c) for filings received on or after DD/MM/YYYY, Decision 482 (C-25) applies; the fee, calculated in accordance with the fee schedule in force at the date of receipt, is payable after receipt of the notice;

3 that the fee shall be regarded as a charge for a satellite network filing. There will be no charge for modifications which do not result in further technical or regulatory examination by the Radiocommunication Bureau, except modifications under 1*quater* above, including but not limited to the name of the satellite/earth station and its associated satellite name, name of the beam, responsible administration, operating agency, date of bringing into use, period of validity, associated satellite (and beam) or earth station name;

4 that each Member State shall be entitled to the publication of Special Sections or parts of the BR IFIC (Space Services) for one satellite network filing (except non-GSO satellite system filings meeting at least one of the three following criteria: non-GSO satellite systems with more than 25 000 units, non-GSO satellite systems containing two or more mutually exclusive configurations or non-GSO satellite systems subject to Nos. **22.5C**, **22.5D**, **22.5F** and **22.5L** of Article **22** of the Radio Regulations) each year without the charges referred to above. Each Member State in its role as the notifying administration may determine which network shall benefit from the free entitlement[[3]](#footnote-4);

5 that the nomination of the free entitlement for the calendar year of receipt by the Bureau of the satellite network filing based on the formal date of receipt of the filing shall be made by the Member State no later than the end of the period for payment of the invoice in *decides* 9 below. The free entitlement cannot be applied to a filing previously cancelled for non-payment;

6 that for any satellite network for which the advance publication information (API) was received prior to 8 November 1998, there will be no cost-recovery charges for the first coordination request referring to that API, regardless of when the Radiocommunication Bureau receives it. Any modifications received on or after 1 January 2006 shall be subject to a charge in accordance with *decides* 2 above;

7 that there will be no cost-recovery charges for any Part A submission involving the application of Article 4 of Appendices **30**/**30A** received by the Bureau prior to 8 November 1998 or Part B submission involving the application of Article 4 of Appendices **30**/**30A** where the associated Part A was received prior to 8 November 1998. Any request for publication in Part A received after 7 November 1998 under § 4.3.5 up to 2 June 2000 and then § 4.1.3 or § 4.2.6 of Appendices **30**/**30A** and corresponding Part B submitted under § 4.3.14 up to 2 June 2000 and the § 4.1.12 or § 4.2.16 of Appendices **30**/**30A** shall be subject to a charge in accordance with *decides* 2 above;

7*bis* that there will be no cost-recovery charges for any submission under § 6.17 of Article 6 of Appendix **30B** where the associated submission under § 6.1 of that Article was received prior to 17 November 2007;

8 that the Annex (Schedule of processing charges) to this decision should be reviewed periodically by the Council;

9 that the payment of charges shall be made on the basis of an invoice issued upon receipt of the filing by the Radiocommunication Bureau and sent to the notifying administration or, at the request of that administration, to the satellite network operator in question within a period of a maximum of six months\* after issue of the invoice;

\*During the discussion, some administrations proposed another alternative “or by the end of the same submission calendar year”.

10 that any subsequent cancellation received by the Radiocommunication Bureau within 15 days of the date of receipt of the filing shall remove the obligation to pay the fee;

11 that publication of Special Sections or parts of the BR IFIC (Space Services) for the amateur-satellite service, the notification for recording of frequency assignments for earth stations, for the conversion of an allotment into an assignment in accordance with the procedure of former Section I of Article 6 of Appendix **30B**, the addition of a new allotment to the plan for a new Member State of the Union in accordance with the procedure of Article 7 of Appendix **30B**, the application of Resolution **170 (Rev.WRC-23)** shall be exempt from any charges;

12 that the date of entry into force of Decision 482 (modified 2025) shall be DD/MM/YYYY;

13 that the provisions of this decision need to be revised when further data from time recording are available,

recommends

that should Council revise the schedule in the Annex, any credits that may arise should be applied by the Bureau to subsequent invoices as requested by administrations,

encourages Member States

to develop domestic policies that will minimize the occurrence of non-payment and consequential revenue loss to ITU,

instructs the Director of the Radiocommunication Bureau

1 to enhance the Radiocommunication Bureau’s electronic notice form software (SpaceCap) in order to enable the calculation of the best estimated charges associated with a satellite network filing of any type prior to its submission to ITU;

2 to submit an annual report to the Council on the implementation of this decision, including analyses of:

a) the cost of the different steps of the procedures;

b) the impact of the electronic submission of information;

c) enhancement in quality of service, including, among others, reduction of the backlog;

d) the costs of validating filings and requesting corrective action thereto; and

e) difficulties encountered in applying the provisions of this decision,

3 to inform the Member States of any practice used by the Radiocommunication Bureau to implement the provisions of this decision and the rationale for that practice.

**Annex**: 1

ANNEX 1

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. | 570 | | Not applicable | |
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| 2 | Coordination (C)f) | 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. | 20 560 | 5 560 | 150 | Product of the number of frequency assignments, number of classes of station and the number of emissions, summed up for all frequency assignment groups |
| C2\* | 24 620 | 9 620 |
| C3\* | 33 467 | 18 467 |
| 3 | Notification (N)a), f) | 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.  \*During the discussion in 3rd EG Dec 482 meeting, the following clarification were sought:   1. For categories N1   If an administration submit a Notification for recording in the MIFR of frequency assignments to a satellite network subject to coordination under Section II of Article **9** together with No. **9.21**, should that administration pay the amount this column with or without application of **No. 9.21**.   1. For categories N2   If an administration submit a Notification for recording in the MIFR of frequency assignments to a satellite network subject to coordination under Section II of Article **9** together with No. **9.21,** which does not involve 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** or some of this provisions, should they pay the full amount reflected in this column (69 504 CHF)?  Justification are required for the above full amount. | 37 092 | 19 092 | 180 |
| 69 504 | 51 504 |
| N2\* |
| 69 504 | 51 504 |
| N3\* |
| N4 | Notification for recording in the MIFR of frequency assignments to a satellite network not subject to coordination under Section II of Article **9**, or to a non-geostationary satellite network subject to No. **9.21** only. | 7 030 | | Not applicable | |
|  |  |  |  |
| 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 7 217.50 CHF is applicable. | 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). | 11 550 | |
| P3 | Coordination request in accordance with Article 2A of Appendices **30** and **30A**. | 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 6 337.50 CHF is applicable. | 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)**. | 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 C1, C2, C3, N1, N2 and N3 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 no additional fee per additional unit.

f) For categories C1 to C3 and N1 to N4, each filing subject to Nos. **22.5C**, **22.5D**, **22.5F** and **22.5L** is subject to an additional fee of 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.

**\* 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**[[4]](#footnote-5) |
| F | No. **9.21** |

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1. In this decision, the term “satellite network” refers to any space system in accordance with No. **1.110** of the Radio Regulations. [↑](#footnote-ref-2)
2. The fee per “unit” (see Annex) shall not be understood as a tax imposed on spectrum users. It is used here as a driver for the calculation of cost recovery relating to publication of satellite systems. [↑](#footnote-ref-3)
3. A submission of filings under Article 4 of Appendix **30** and Appendix **30A** in the Regions 1 and 3 Plans, referring to a single orbital position with the same satellite name and received on the same date shall be considered as one “satellite network” filing for the purpose of free entitlement. [↑](#footnote-ref-4)
4. Cost recovery for category C1 only. See also *decides* 11. [↑](#footnote-ref-5)