

# Commenting on Special Sections

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# Introduction of Commenting process

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# General Concepts (1)

## What is a comment?

- An indication from an Administration on **whether or not it accepts the technical characteristics** of a frequency assignment to a satellite network submitted to the Bureau.
- The acceptance of the characteristics of an assignment may imply
  - **the acceptance of potential interference** to radiocommunication services, or
  - **the inclusion of the territory** of the commenting Administration in the service area of the incoming satellite network.

## Why do Administrations have to comment?

- To protect their radiocommunication services against potential interference
- To exclude the territory of an Administration from the service area

## Which Administrations have to comment?




- **All Administrations** may need to comment,
  - **even if they are not responsible of any satellite network** (potential interference to terrestrial services or to assignments/allotments in the Plans), and
  - **even if they are not identified as potentially affected** in Special Section.

# General Concepts (2)




## When do Administrations have to comment?

- Within **4 months** from the date of publication of the corresponding Special Section
  - Except for exclusion of territories, replies to BR assistance or commenting under 11.28.1

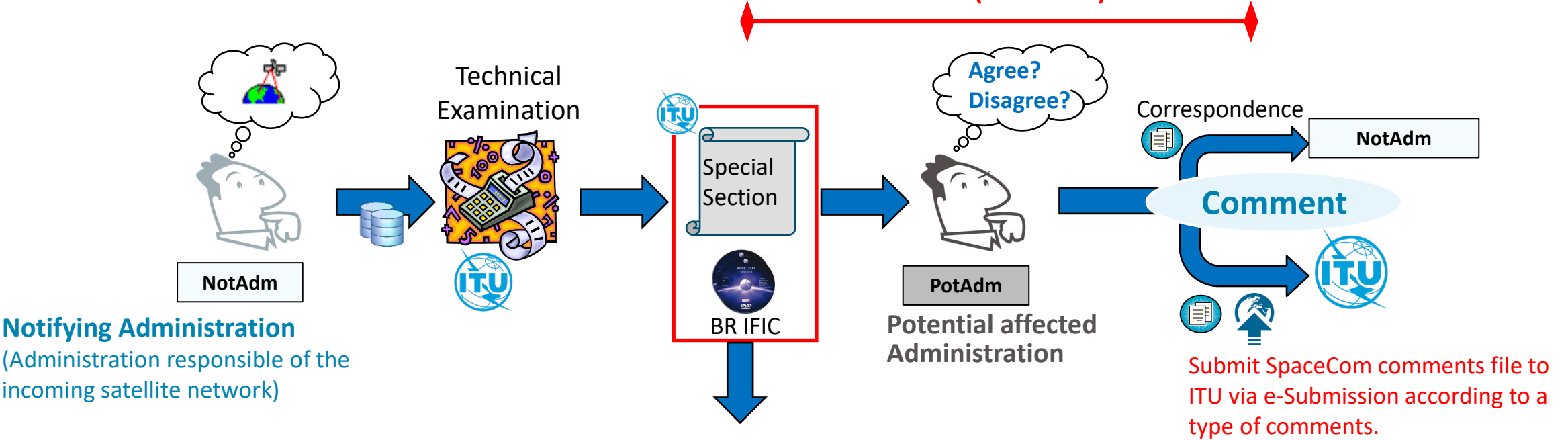
## To whom should comments be sent?

- To the notifying Administration
  - By correspondence 
- To the Bureau
  - By correspondence  and e-Submission (SpaceCom comments file) 

## How do Administrations have to comment?

-  BR software **SpaceCom** to capture your comments
-  Send Correspondence (**e-Communications**, telefax, letter, email)
-  **e-Submissions system** to submit SpaceCom comments to the Bureau

# General Commenting Workflow



## Special Sections subject to comments:

	Non-Planned Services			Planned Services					
				Appendices 30 and 30A				AP30B and Res.121 (WRC-23)*	
	Sub-section IA of Article 9	Section II of Article 9	Part I-S under 11.28.1*	Article 4 of AP30/30A		Article 2A of AP30/30A			
				Regions	All	All	All	Regions 1&3	Region 2
Special Section	API/A	CR/C	-	AP30/E (Part A) AP30A/E (Part A)	AP30-30A/E (Part A)	AP30-30A/F/C	AP30-30A/F/C	AP30B/A6A	AP30B/ESIM/A

\* This provision is to enter into force as from 1.1.2025.

# Type of Comments

 When an Administration is identified as potentially affected

- **Agreement or disagreement.**

 When an Administration is not identified as potentially affected

- Comments submitted under **No.9.3** (comments to **API/A**), **No.11.28.1\*** (comments to **Part I-S**)
  - Criteria for commenting: (1) Interference to terrestrial services  
(2) Interference to space services  
(3) Exclusion of territory (For comments under No.11.28.1, only (2) is applicable.)
- Request for inclusion/exclusion in coordination list under **No.9.41** (comments to **CR/C** for **CR/E**)

 Regardless of identification as affected

- Request for exclusion of territory:
  - **No.23.13B/C**: Only applicable to assignments in the Broadcasting-Satellite Service (BSS)
  - **§ 4.1.10e of Article 4 of Appendix 30A**: Applicable to assignments published in accordance with **Appendix 30A**
  - **§ 6.16 of Article 6 of Appendix 30B**: Applicable to assignments published in accordance with **Appendix 30B**

# Commenting on Special Sections at a glance



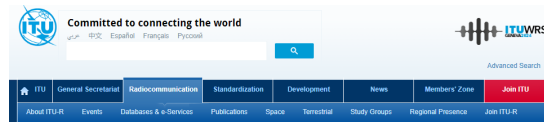
Special Section	Region	Identification (provisions)	Comments submitted under	Commenting approach	How to comment	Summary of comments (Special Section)	BR Assistance procedure
API/A	All	-	No.9.3	SpaceCom req.	SpaceCom	API/B	-
(Part I-S)*	All	-	No. 11.28.1	SpaceCom req.	SpaceCom	-	-
CR/C	All	9.7, 9.7A, 9.7B	No.9.52	SpaceCom <b>not</b> req.	Corresp.	-	Nos.9.60-9.62
		AP30#7.1, AP30A#7.1 RS539					-
		9.11 9.11A (9.12, 9.12A, 9.13, 9.14) 9.21/A, 9.21/B, 9.21/C	No.9.52	SpaceCom req.	SpaceCom	CR/D	-
		-	No.9.41	SpaceCom req.	SpaceCom	CR/E	-
AP30/E (Part A) AP30A/E (Part A)	1 & 3	All	§ 4.1.7, 4.1.9, 4.1.10 of AP30/30A	SpaceCom <b>not</b> req.	Corresp.	-	§ 4.1.10a - 4.1.10d
AP30-30A/E (Part A)	2	All	§ 4.2.10, 4.2.13, 4.2.14 of AP30/30A	SpaceCom req.	SpaceCom	AP30-30A/E (Part D)	-
AP30-30A/F/C	1 & 3	AP30#4.1.1D	§ 4.1.7, 4.1.9, 4.1.10 of AP30/30A	SpaceCom <b>not</b> req.	Corresp.	-	§ 4.1.10a - 4.1.10d
		9.7	No.9.52	SpaceCom <b>not</b> req.	Corresp.	-	Nos.9.60-9.62
		AP30#7.1, AP30A#7.1					-
AP30-30A/F/C	2	AP30#4.2.3D	§ 4.2.10, 4.2.13, 4.2.14 of AP30/30A	SpaceCom req.	SpaceCom	AP30-30A/F/D	-
		9.7	No.9.52	SpaceCom <b>not</b> req.	Corresp.	-	Nos.9.60-9.62
		AP30#7.1, AP30A#7.1					-
AP30B/A6A	All	AP30B#6.5	§ 6.10 of AP30B	SpaceCom <b>not</b> req.	Corresp.	-	§ 6.13-6.15
		AP30B#6.6	-	SpaceCom <b>not</b> req.	Corresp.	-	-
AP30B/ESIM/A*	All	§5 of Section A of Part I of Annex 1 of RES121	§9 of Section A of Part I of Annex 1 of RES121	SpaceCom <b>not</b> required	Corresp.	-	§ 6.13-6.15 (with exceptions)
	All	§2 of Part II of Annex 1 of RES121	§3 of Part II of Annex 1 of RES121	SpaceCom req.	SpaceCom	-	-



# Installation of SpaceCom

Install latest Space Software v10\* from SSD site here:

<https://www.itu.int/en/ITU-R/software/Pages/space-network-software.aspx>



Space networks and related software

YOU ARE HERE: ITU > HOME > ITU-R > SOFTWARE

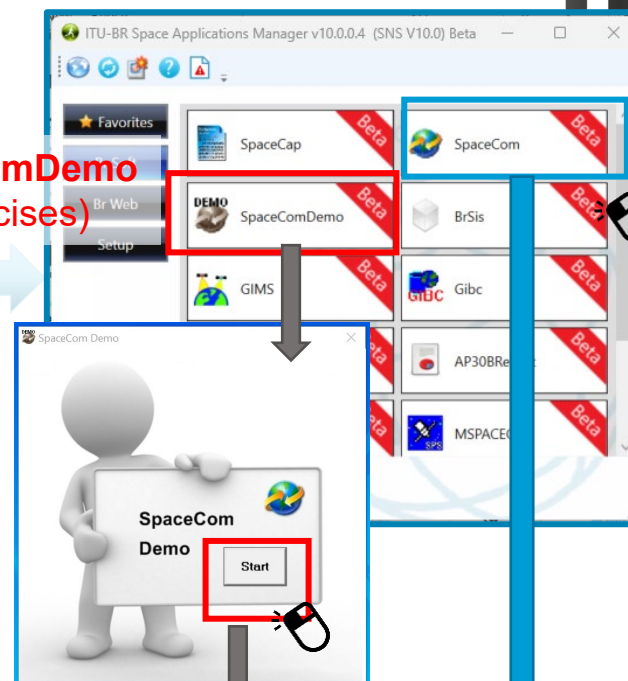
Antenna Patterns  
APT/Captures  
Archives  
BR-SIS  
BRSS-Query  
EFPD  
GISC  
GIMS  
GIMS Exercises & Videos  
SAM  
Software Libraries  
SpaceCap  
SpaceCom  
SpacePub  
SpacePubLib  
SpaceSim  
SpaceSimLib

**Download and Install!**

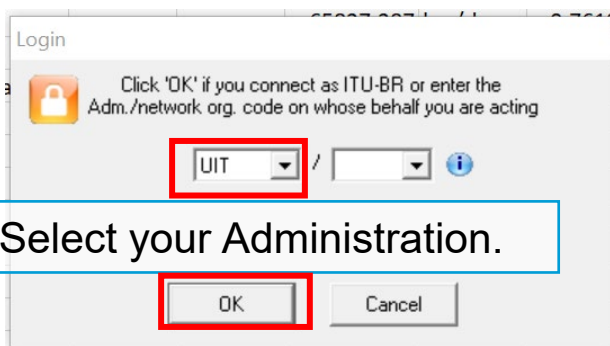
Open



**SpaceComDemo**  
(For exercises)

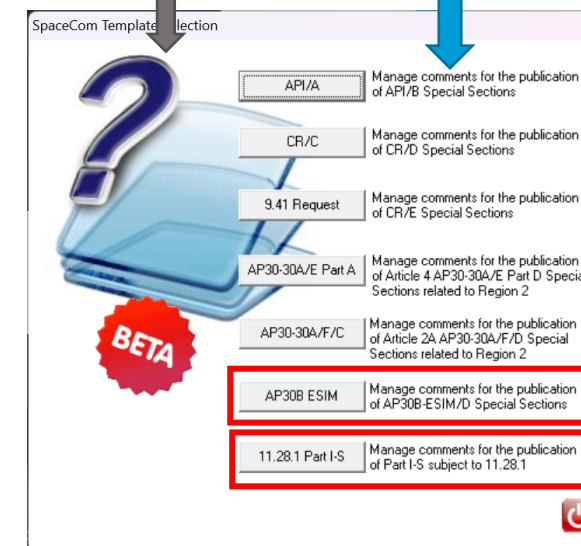


SpaceCom



**Select your Administration.**

Select a type of comments your Administration wishes to create.



**NEW!**  
**AP30B ESIM**

**Part I-S under  
11.28.1**

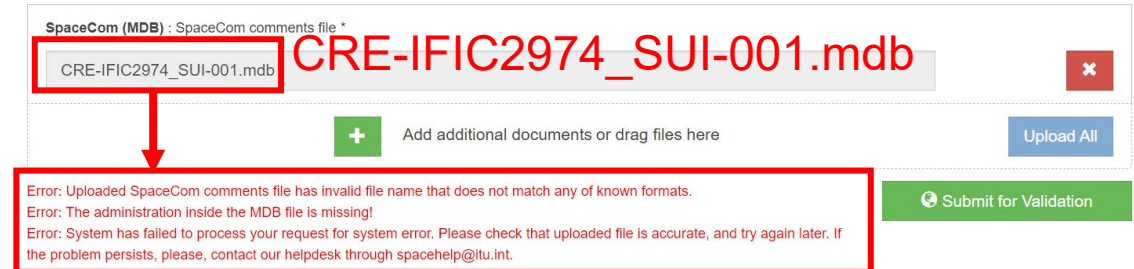
- 1.SpaceCom **ver9.1** is used to make comments to Special Sections up to IFIC **3036** (10.12.2024).
- 2.SpaceCom **ver10** is used to make comment to IFIC **3037** (7.1.2025) and subsequent IFICs.

# Tips to submit SpaceCom comment files via e-Submission

## ! Take care of a file name of a SpaceCom comments file

Acceptable file names of SpaceCom comments files are limited to

- IFICxxxx\_ADM.mdb
- CRE-IFICxxxx\_ADM.mdb
- API-IFICxxxx\_ADM.mdb
- PLAN-IFICxxxx\_ADM.mdb
- SOF-IFICxxxx\_ADM.mdb
- 30B-ESIM-IFICxxxx\_ADM.mdb
- NOTIF-IFICxxxx\_ADM.mdb



SpaceCom (MDB) : SpaceCom comments file \*

CRE-IFIC2974\_SUI-001.mdb

+ Add additional documents or drag files here

Upload All

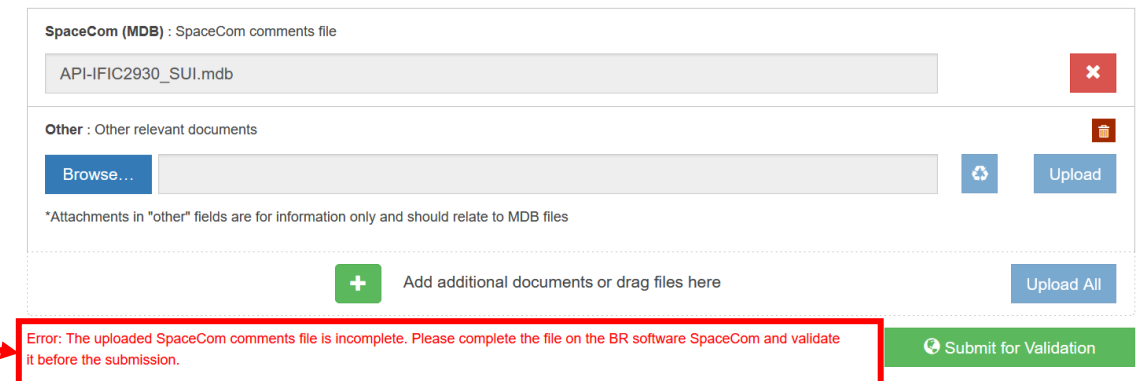
Submit for Validation

Error: Uploaded SpaceCom comments file has invalid file name that does not match any of known formats.  
Error: The administration inside the MDB file is missing!  
Error: System has failed to process your request for system error. Please check that uploaded file is accurate, and try again later. If the problem persists, please, contact our helpdesk through spacehelp@itu.int.

**Submission of unacceptable file name is blocked and shows error messages.**

## ! Make all comments completed

- Make all comments completed on SpaceCom.
- Submission of uncompleted SpaceCom comment file is blocked with an error message.



SpaceCom (MDB) : SpaceCom comments file

API-IFIC2930\_SUI.mdb

Other : Other relevant documents

Browse... Upload

\*Attachments in "other" fields are for information only and should relate to MDB files

+ Add additional documents or drag files here

Upload All

Submit for Validation

Error: The uploaded SpaceCom comments file is incomplete. Please complete the file on the BR software SpaceCom and validate it before the submission.

**Error: The uploaded SpaceCom comments file is incomplete. Please complete the file on the BR software SpaceCom and validate it before the submission.**

# Tips to submit SpaceCom comment files via e-Submission

## ! Withdraw former SpaceCom file in submitting another SpaceCom file to a same IFIC

- Withdraw initial SpaceCom comments file when submitting another SpaceCom comments file to the same IFIC.
- The process may be delayed or confused if duplicated comments have been submitted to BR.

BR Registry Date	Comments type	IFIC	IFIC date	Status
16.10.2022	CR/D	2974	28.06.2022	Submitted to BR
14.10.2022	CR/D	2974	28.06.2022	Accepted by BR

Click on "Request for withdrawal"

## ! Submission after 4 months period is warned

- Warning message is shown when comments are submitted after 4 months commenting period.
- Administrations can submit comments after 4 months period. However, the comments may be **not receivable**.
- The BR registry date of comments submitted after 4 months is shown in red texts to stand out.
- Contact BR for any difficulties in advance of a deadline.

Warning!

Your submission date is outside the BR IFIC 4 month commenting period and may not be **receivable** by Bureau.

Cancel Submit Anyway

BR Registry Date	Comments type	IFIC	IFIC date	Status	Uploaded
16.10.2022	API/B	2973	14.06.2022	Submitted to BR	ADM.
					ITU

# Thank you!

ITU – Radiocommunication Bureau

Questions to

[brmail@itu.int](mailto:brmail@itu.int)

[SpaceCom\\_Support@itu.int](mailto:SpaceCom_Support@itu.int)

[brsas@itu.int](mailto:brsas@itu.int) (for SpaceCom software)