



World Radiocommunication Seminar 2016

RECEIVABILITY OF FORMS OF SPACE NOTICES

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RECEIVABILITY OF NOTICES

Receivability - Presentation Summary

1. General rules - Receivability entry examination
2. Communication problems between the ADM & BR
3. *Reply from ADM*
4. *Cost recovery / Withdraw of filing by ADM*
5. Results of the Receivability process
6. Coordination request
7. Notification
8. Due Diligence Information (RES-49)
9. Notification Resubmission

RECEIVABILITY OF THE NOTICES

Entry examination of the notice received by the Bureau

- Submission of information in *electronic format (RES 55)*
- Application of the Radio Regulations (RR)@2016
<http://www.itu.int/pub/R-REG-RR/en>
- Application of the Rules of Procedures (RoP)
<http://www.itu.int/pub/R-REG-ROP/en>
concerning the ***Receivability*** of forms of notice
 - ***its completeness*** - All related RR items (for example commitments, AP4 and GIMS data) *are provided*
 - ***its correctness (AP4 and GIMS data)***
using the BR validation software

RECEIVABILITY OF THE NOTICES

ROP 3.3 on Receivability of notices – Validation software

- *RoP Receivability 3.3* - Considering the requirement for *mandatory electronic filing and availability to ADM of capture and validation software*, where a notice received by the Bureau does not contain all of the mandatory information as defined in Annex 2 of Appendix 4 or appropriate reason for any omissions, the Bureau shall regard the notice as **incomplete**
- When ADM execute the Bureau validation software (SpaceVal), there can be an error message in the Validation report - *the error levels may be:*
- **F** *the error is fatal and the transaction cannot pass validation and submitted to the Bureau if any fatal errors exist*
- **W** - *this is a warning to the user to check the flagged data item. A transaction with "warnings" can proceed and submitted to the Bureau, if the ADM desires*

RECEIVABILITY OF THE NOTICES

ROP 3.3 on Receivability of notices – Validation software

- In case of “**F**atal” error, ADM in the covering letter for submission of AP4 data to the Bureau, are requested to report to the Bureau any difficulties encountered in the use of the SpaceVal software, when it concerns any unresolved “*Fatal*” error messages in the validation report
- If no report to the Bureau about of “**F**atal” error, notice submission is NOT Receivable
- The Bureau shall immediately inform the administration and seek the information not provided
- Further processing of the notice by the Bureau will remain in abeyance and a formal date of receipt (see RoP § 3.1) will not be established until the missing information is received. The formal date of receipt will be the date of receipt of the missing information (see also RoP § 3.6 to 3.10)

RECEIVABILITY OF THE NOTICES

ROP 3.3 on Receivability of notices – Validation software

- In case of “Warning” error the Bureau recommends that administrations also review the “*Warning*” error messages in the validation report
 - These “*Warning*” messages identify any potentially incorrect, impossible or implausible data values
 - “*Warning*” messages may lead to the identification of incorrect AP 4 data or unfavourable findings during the regulatory and technical examination of the notice by the Bureau

RECEIVABILITY OF THE NOTICES

Basic ROP related to the Receipt of notices - BR registry date

- **ROP 2** - *It is incumbent on all ADM to meet deadlines established in the RR and, accordingly, to take account of possible mail delays, holidays or periods during which ITU may be closed*
 - *ITU-R CR letters: <http://www.itu.int/md/R00-CR-CIR/en>*
 - *Mail received through the postal service shall be recorded as received on the first working day following period of closure*
 - *E-mail or telefax documents shall be recorded as received on the actual date of receipt*
 - *In the case of E-mails, an administration is required to send, within 7 days of the date of the E-mail, a confirmation by either telefax or mail which shall be regarded as being received on the same date as the original E-mail*
- ❖ *Administration shall not use the BR staff E-mail address for submission of their notices to the BR Registry*

RECEIVABILITY OF THE NOTICES

Basic ROP related to submission of the notices

All surface mail must be sent to:
ITU Radiocommunication Bureau
Place des Nations
CH-1211 Geneva 20
Switzerland

All telefaxes must be sent to: **+41 22 730 5785**
(several lines)

All E-mail **must be sent to BR Registry:** brmail@itu.int

E-mails received by the BR Registry
shall be acknowledged
by the BR mail server *(PLS check your emails!)*

RECEIVABILITY OF THE NOTICES

Basic ROP related to submission of the notices BR mail server acknowledgement sample





Mon 05.12.2016 08:46

brdms

Re: 09C(SSC)I-2016-028615 02/12/2016 BR IFIC 2825 CR/C comments from Affected Administration CAN

To BRMAIL, ITU

Message  i-2016-028615.pdf (58 KB)  i-2016-028615.eml (1 MB)

Le Bureau des radiocommunications accuse réception de votre message électronique.
The Radiocommunication Bureau acknowledges receipt of your e-mail.
La Oficina de Radiocomunicaciones acusa recibo de su correo electrónico.

Sender email = [m\[redacted\]@canada.ca](mailto:m[redacted]@canada.ca).

This is an automatically generated email, please do not reply. For inquiries please refer to BRMAIL@itu.int.

If no email acknowledgement received on the next Bureau working day PLS contact

Radiocommunication Bureau (BR)

Voice: +41 22 730 5560

Fax: +41 22 730 5785

Email: brmail@itu.int

RECEIVABILITY OF THE NOTICES

FAX /communication problems between the BR/ADM and ADM/ADM

- **FIRST check ADM contact address at:**
http://www.itu.int/online/mm/scripts/org_br_admin.list
- The Bureau has been facing difficulties in informing ADMs of its actions in application of the RR through telefaxes
- *Under this circumstance, the Bureau has no other option than to send the same information by surface mail*
- In addition to the surface mail, ***the Bureau is ready to send an e-mail with PDF attachment*** (scanned telefax) to ADMs whose official e-mail address (max 3) has been communicated to the Bureau, whenever the communication through telefax would not be successful (see **CR/366**)
- ***In case of difficulties sending telefax to the Bureau***, ADM shall inform the Bureau about a temporary arrangement – sending ***e-mail with PDF attachment*** (scanned telefax) to the BR Registry

RECEIVABILITY OF THE NOTICES

Basic rules related to submission of the notices

Please don't FORGET !

- As far as possible, submit one notice in one mdb file
- To *change the file extension from .mdb to .ITU* before sending them to the BR
- Ensure that all SNS and GIMS (**V8**) data are in mdb format and all relevant ADM notes have been included in a zip file
- Notice to be submitted to **BRMAIL@ITU.INT**
- Submit a confirmation fax/letter within 7 days to

+41 22 730 5785

Establishment of Date of Receipt (1)

- If a notice *does not contain all of the mandatory information* as defined in the AP 4 of the RR, or for example - *the email from ADM is without attached data or a letter with an empty CD-ROM etc...*, further processing of the notice will remain in abeyance and *a date of receipt will not be established until the missing information is received*
- If all mandatory data have been submitted and further clarification is required concerning the correctness of the mandatory data, the Bureau shall request the ADM to provide the *clarification within 30 days*
- *If the information is received within the 30 days period, the original date of receipt is retained,* otherwise, *a new date of receipt will be established*

Establishment of Date of Receipt (2)

- Nevertheless, for replies received within the above period of 30 days, **a new** formal date of receipt (**and cost recovery**) is established in those cases (or for the concerned part of the network) where the information submitted subsequently is **outside the scope and beyond the objective** of the Bureau's enquiry, if the **new or modified data** has impact on the **regulatory and technical examination** *irrespective of whether the newly provided information adds new affected administrations or not*

RECEIVABILITY OF THE NOTICES

Result of the Receivability

- *In case of Coordination request:*
 - Acknowledgment letter by the Bureau and
 - confirmation of the Bureau Registry date - establishment of the formal regulatory date of receipt
- *In case of Notification – NO Acknowledgment letter by the Bureau – see PART I-S publication in the BR IFIC (Space)*
- *In case of API - NO Acknowledgment letter by the Bureau – see API/A publication in the BR IFIC (Space)*
- ***Cost recovery invoice - upfront Stage***
 - Upfront Invoice will be issued based on the category and units of the filing as received by the Bureau
- ***Withdraw of notice*** - any subsequent cancellation received by the Bureau within 15 days of the date of receipt of the filing shall remove the obligation to pay the Cost recovery fee

List of notices "as received"

- According to **RES-55**, Coordination Requests (CR) or Notifications are made available "as received" by the BR within 30 days on its website - **SNL PART-C**
<https://www.itu.int/ITU-R/go/space/snl/en>
- **This advance version of the information "as received" from the ADM is not to be confused with the official publication of the relevant PART or Special section which is yet to occur**
- WRC-15 removed the requirement to make "as received" available on the BR IFIC DVD ROM
- *As part of the adoption of No. **9.1A** by WRC-15, ADM requested the Bureau to provide a short summary of the CR on its website as soon as possible after the receipt of the submission*

To meet both requirements, the Bureau will endeavor to make available CR "as-received", along with a short summary, within a **max period of 7 days after the receipt of the complete CR** on its "as-received" website at: <https://www.itu.int/en/ITU-R/space/snl/Pages/asreceivedCR.aspx>

Sect. II of ART 9 – Request for Coordination (CR) submissions

Receivability rules for **CR submitted** to the BR up to **31.12.2016**

- In accordance with **RES-31**, from 1 July 2016, No. **9.1 is no more applicable** to satellite networks subject to the coordination procedures in Sect. II of ART 9
- From the same date, the *SpaceWISC system will cease to accept* any new API filings or related amendments
- For a CR referring to **an API received on or before 30 June 2016**, it shall be considered as having been received on the date of receipt of the CR that *cannot be earlier than six months after the date of receipt of the associated API* in accordance with No. **9.1** of the RR (edition 2012)
- For a CR not referring to **any API received by 30 June 2016**, the **CR** will be considered as having been received by the Bureau on **1 January 2017**, and treated accordingly

Submission of notices that are subject to coordination procedure under

Transitional measures for API procedure

(See also BR Circular Letters **CR/401** and **CR/415**)

- In accordance with RES-31, any API for a satellite network subject to the coordination procedures in Sect. II of ART 9 for which a CR has not been received by the Bureau under No. 9.30 by 31 December 2016 shall be subsequently suppressed by the Bureau and no longer taken into account
- From 1 July 2016, the Bureau doesn't publish *MODs* API/A concerning changes of satellite name and/or orbital positions within $\pm 6^\circ$ received in CR
 - *These changes are available online for consultation by administrations at:*

<https://www.itu.int/net4/ITU-R/space/satnamechanges>

Sect. II of ART 9 – Request for Coordination (CR) submissions

(See also BR Circular Letter **CR/415**)

Receivability rules for **CR submitted** to the BR as of **01.01.2017**

- In conformity with No. **9.1A**, the *API basic characteristics, extracted from the CR* received on or after 01.01.2017 will be published in a new series of “**API/C**” special section - *with the **same date of receipt as the CR** of the satellite network*
- There is no change in the CR/C publication process
- The **CR date of receipt** will serve as the **regulatory start date** (*grp.d_start*) for defining the **“7 years”** regulatory date limit (*grp.d_reg_limit*) for bringing into use any frequency assignments of the satellite network under No. **11.44**. Both dates will be available in the CR for each frequency assignment group
- Any MOD to a CR involving the *use of an additional frequency band or modification of the orbital location for a space station using the geostationary-satellite orbit* will require a **new API** publication under No. **9.1A**

Notification and recording of frequency assignments procedure under ART 11 of the RR

- No. **9.1** Before initiating any action under ART**11** in respect of frequency assignments for a satellite network or a satellite system not subject to the coordination procedure (ART**9**), an ADM, shall send to the Bureau a *general description* of the network for API publication in the BR IFIC [*not earlier than seven years and*] *preferably not later than two years before the planned date of bringing into use* of the network or system
- When *Notification* is communicated to the BR at the same time as the API, the *formal date of receipt* of Notification information (PART I-S) *shall be 6 months after the date of publication* of relevant **API/A** publication

RECEIVABILITY OF THE NOTICES for **API** that are **NOT** subject to coordination procedure under Sect. II of ART 9

- API phase is ***obligatory***, before Notification under Article **11**
- No priority in being first to start API
- ***Formal date of receipt of the API*** (No.**9.1**) starts the ***"7 years regulatory clock"*** for the notified date of bringing into use (see No.**11.44**)

RECEIVABILITY OF THE NOTICES for **API** that are **NOT** subject to coordination procedure under Sect. II of ART 9

Where to find the API/A formal Date of Receipt?



UNION INTERNATIONALE DES TÉLÉCOMMUNICATIONS
BUREAU DES RADIOCOMMUNICATIONS

INTERNATIONAL TELECOMMUNICATION UNION
RADIOCOMMUNICATION BUREAU

UNIÓN INTERNACIONAL DE TELECOMUNICACIONES
OFICINA DE RADIOCOMUNICACIONES

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RÉSEAU À SATELLITE SATELLITE NETWORK RED DE SATÉLITE	AST-NG-NC-QV		SECTION SPÉCIALE N° SPECIAL SECTION No. SECCIÓN ESPECIAL N.º	API/A/11923
			BR IFIC / DATE BR IFIC / DATE BR IFIC / FECHA	2834 / 06.12.2016
ADM. RESPONSABLE RESPONSIBLE ADM. ADM. RESPONSABLE	F	LONGITUDE NOMINALE NOMINAL LONGITUDE LONGITUD NOMINAL	NGSO	NUMÉRO D'IDENTIFICATION IDENTIFICATION NUMBER NÚMERO DE IDENTIFICACIÓN
RENSEIGNEMENTS REÇUS PAR LE BUREAU LE / INFORMATION RECEIVED BY THE BUREAU ON / INFORMACIÓN RECIBIDA POR LA OFICINA EL				10.08.2016

Ces renseignements sont publiés par le Bureau des radiocommunications en application du No. 9.2B. Ils font l'objet de la (les) procédure(s) suivante(s), indiquée(s) ci-dessous par un X dans la case pertinente.

This information is published by the Radiocommunication Bureau in accordance with No. 9.2B. It is subject to the procedure(s) indicated below by an X in the relevant box.

Esta información se publica por la Oficina de Radiocomunicaciones en virtud del No. 9.2B. Está sujeta al (a los) procedimiento(s) siguiente(s), señalado(s) con una X en la casilla apropiada.

X	Les renseignements ont été reçus conformément à l'Article 9, sous-section IA	The information has been received pursuant to Article 9, Sub-Section IA	La información ha sido recibida de conformidad con el Artículo 9, sub-sección IA
	Toute administration estimant que des brouillages inacceptables peuvent être causés à ses réseaux ou à ses systèmes à satellites existants ou en projet devra communiquer ses commentaires à l'administration qui a demandé la publication, avec copie au Bureau des radiocommunications, dans le délai de quatre mois qui suit la date de la présente publication.	Any administration which believes that unacceptable interference may be caused to its existing or planned satellite networks or systems shall communicate its comments to the publishing administration, with a copy to the Radiocommunication Bureau, within four months after the date of this publication.	Toda administración que estime que pueden causarse interferencias inaceptables a sus redes o sistemas de satélites existentes o previstos comunicará sus comentarios a la administración que haya publicado la información, con copia a la Oficina de Radiocomunicaciones, en un plazo de cuatro meses cortados a partir de la fecha de esta publicación.
DATE LIMITE POUR LA RÉCEPTION DES COMMENTAIRES EXPIRY DATE FOR THE RECEIPT OF COMMENTS FECHA LÍMITE PARA LA RECEPCIÓN DE LOS COMENTARIOS			06.04.2017

RECEIVABILITY OF THE NOTICES for **API** that are **NOT** subject to coordination procedure under Sect. II of ART 9

*Relevant RoP on Receivability
are applicable also to the API*

- Submission of MOD (No. **9.2**) will requiring the application of **API** with a **new date of receipt**
 - for *new frequency band(s)*
 - the **modification of the direction of transmission** for *a space station using a non-GEO satellite orbit*
 - the **modification of the reference body**
 - as well as the use of inter-satellite links of a GSO space station communicating with a non-GSO space station

Notification (1)

- Notification ***not*** earlier than ***3 years before dBiU*** (No. **11.25**)
- Relevant AP4 data have to be provided – see No. **11.15** and RES-55 apply.
No more “only changes” to CR/C
- **ROP 4.3** multiple procedures (API)**C/N** or **API/N** = previously applicable procedures have to be effected
 - assignments that require coordination under Sect II of ART9 ***shall be supported*** by a publication of coordination request (CR/C)
 - assignments that do not require coordination under Sect II of Article 9 ***shall be supported*** by an API/A

Notification (2)

Acknowledgement / Publication of Notification

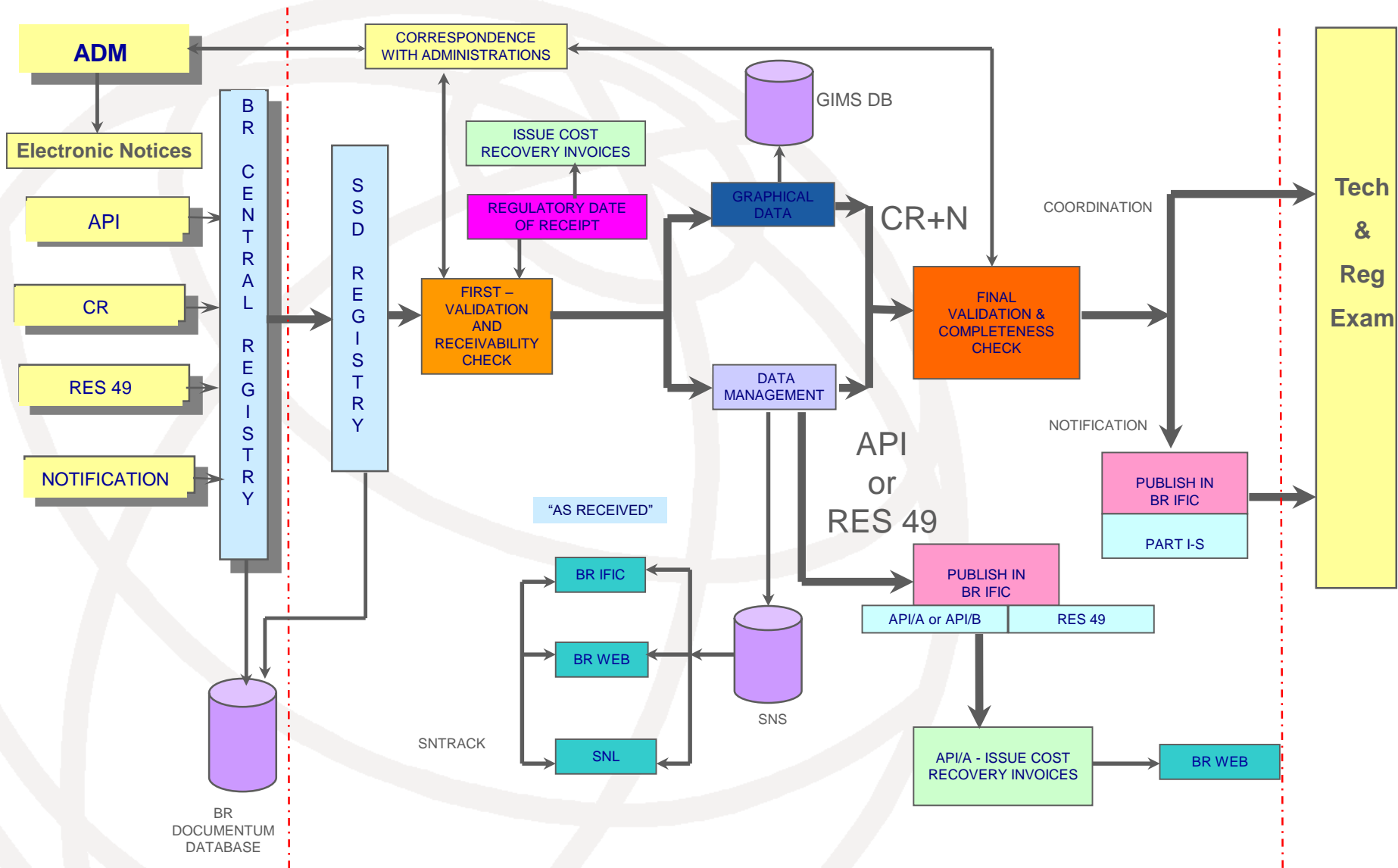
- Complete notices are published in **PART I-S** of the BR IFIC (Space services) with the date of receipt
- This publication shall constitute the acknowledgement to the notifying ADM of receipt of its notice
- PART I-S notices will be used for further technical and regulatory examination by the Bureau

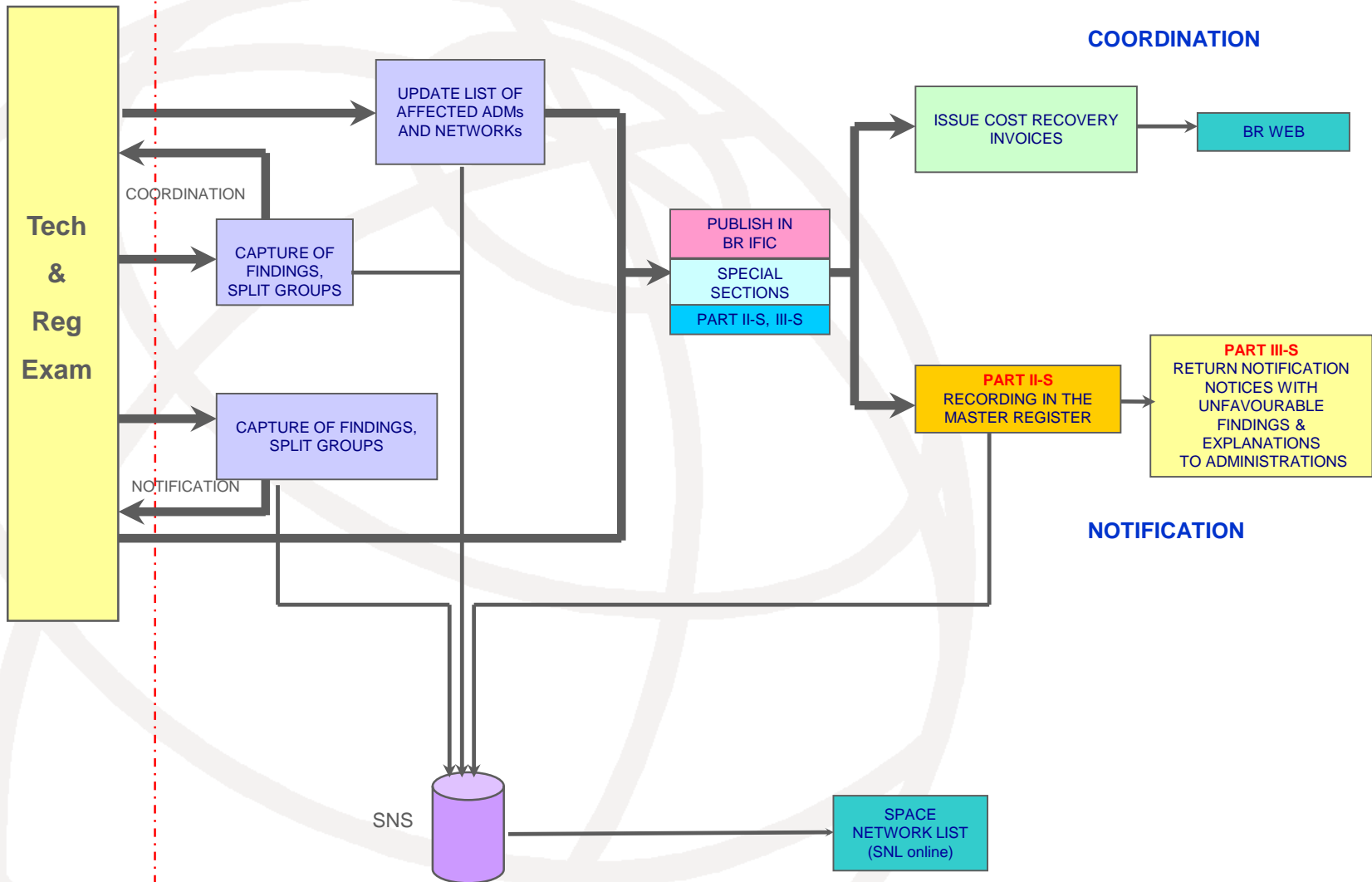
RECEIVABILITY OF THE NOTICES

Time Limit under RES49

- *ADM shall submit RES-49 Annex 2 information with Notification **before** = Ds (No.9.1 or 9.1A) + 7 years or*
- **Before** the confirmed date of bringing into use, *if notified earlier (para12 of Annex 1 of RES-49)*
- **In the absence of RES49 information beyond 7 years (under No.11.44) notice will become not receivable or provisional recording will be deleted and assignments will not be taken into account by BR and Administrations (para11 of Annex 1 of RES-49)**

Processing of Satellite Network Filings





RECEIVABILITY OF THE NOTICES

Time Limit for Resubmission Under No. **11.46**

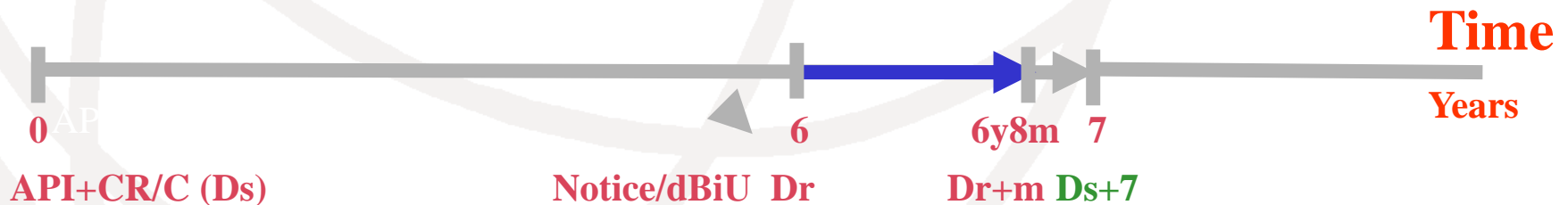
- Date before which Notice has to be Resubmitted after return by the BR in the PART III-S Return letter under Nos. **11.37/11.38**
 = **Dr** (Date stamped on the Return letter by BR) + **6 months**
- **If resubmitted after 6 months BR advises to restart ART 9 procedure** when period for submission under No. **11.44.1** of first notice has expired



RECEIVABILITY OF THE NOTICES

Time Limit for Resubmission Under No. **11.46**

- If resubmitted after 6 months it will be treated as **first submission (cost recovery fee)** and shall comply with provisions of No. **11.44.1**
- The submission is accepted as valid first Notice **ONLY** within **7** year No. **11.44** period



Conclusions 1

- It is and take extremely important to keep track action within the Time Limits for your networks
- *Valuable time may be lost (and cost recovery fee) in applying the procedure all over again **if the time limits are not respected***
- BR may send telefax and Circular Telegrams to remind administrations

Conclusions 2

- Administrations are **strongly encouraged** to keep track of the regulatory Time Limit, **on their own**, without waiting for the reminder from BR
- The RRB may not accept non-receipt of reminders as a good reason for consideration
- The BR is posting only CTs and not individual telefaxes on the WEB in the following address:
<http://www.itu.int/md/R00-CTITU-CIR/en>

RECEIVABILITY OF FORMS OF NOTICES

Attila MATAS

BR SSD-SPR

Questions ?