

30TH WORLD RADIOCOMMUNICATION SEMINAR

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Commenting on Special Sections in general

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www.itu.int/go/wrs-22

#ITUWRS



General Concepts (1)

S What is a comment?

- An indication from an Administration on whether or not it accepts the technical characteristics of an assignment to a satellite network, just as it has been 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

SWhich 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 the corresponding Special Section.
 TUWRS



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 or replies to BR assistance

S To whom should comments be sent?

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

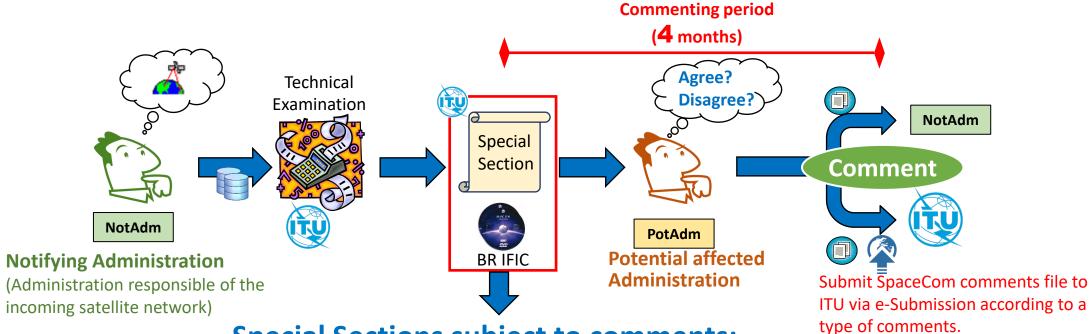
S How do Administrations have to comment?

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



General Commenting Workflow

/RS



Special Sections subject to comments:

	Non-Planned Services		Planned Services					
				Article 6 of				
	Sub-section IA of Article 9	Section II of Article 9	Article 4	of AP30/30A	Article 2A of AP30/30A		Appendix 30B	
Regions	All	All	Regions 1&3	Region 2	Regions 1&3	Region 2	All	
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	



Type of Comments

SWWhen an Administration is identified as potentially affected

• Agreement or disagreement.

SWWhen an Administration is not identified as potentially affected

- Request for inclusion/exclusion in coordination list under No.9.41 (comments to CR/C)
 - Under No.9.7: Criteria for inclusion: $\Delta T/T > 6$ %
 - Under No.9.7A and No.9.7B: Verification of Equivalent Power Flux Densities levels produced by Non-GSOs
- Comments submitted under No.9.3 (comments to API/A)
 - Criteria for commenting: (1) Interference to terrestrial services

(2) Interference to space services

(3) Exclusion of territory

S <u>Regardless of identification</u> as affected

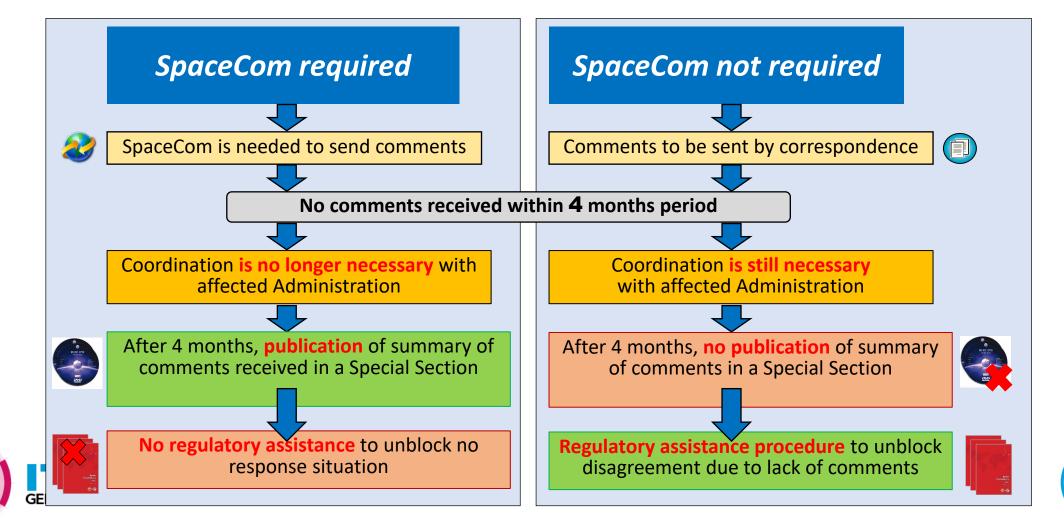
- Request for exclusion of territory:
 - No.23.13B/C: Only applicable to assignments in the Broadcasting-Satellite Service (BSS)
 - § 6.16 of Article 6 of Appendix 30B: Applicable to assignments published in accordance with Appendix 30B



Assumption by default when no reply

What happens when an Administration that has been identified as potentially affected does not reply within the **4** months commenting period?

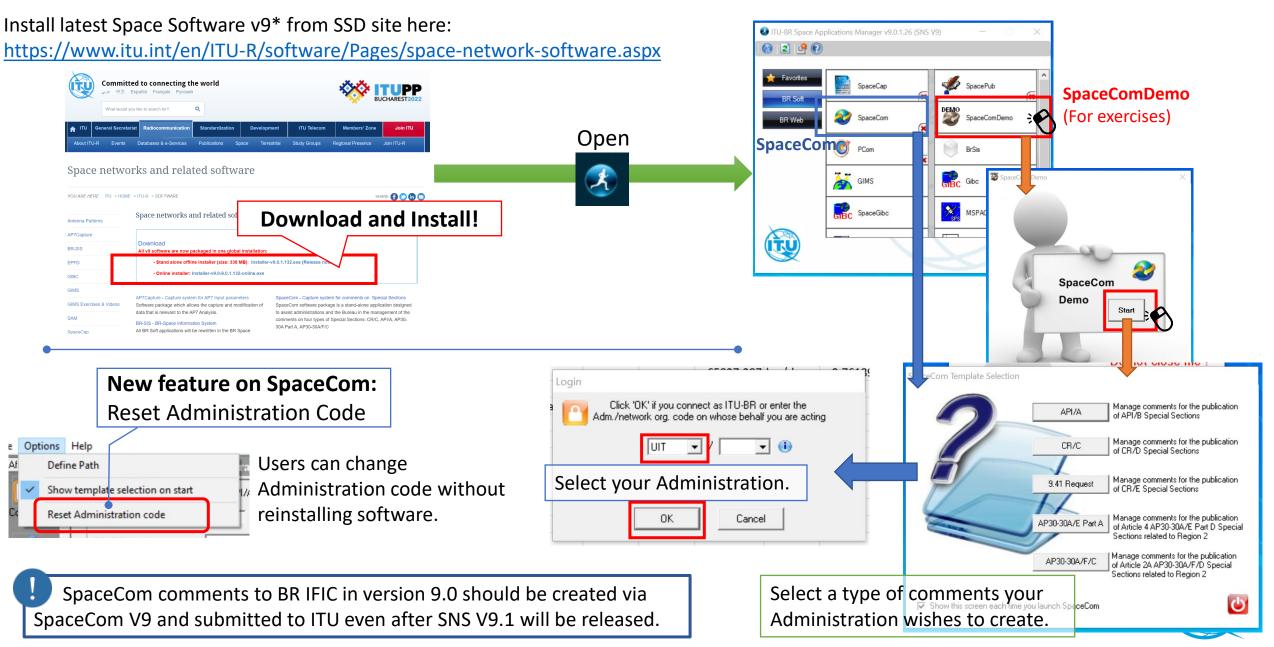
• Two approaches:



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	-
		9.7, 9.7A, 9.7B AP30#7.1, AP30A#7.1 RS539	No.9.52	SpaceCom not req.	Corresp.	-	Nos.9.60-9.62 -
CR/C	All	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 not 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)	-
	1&3	AP30#4.1.1D	§ 4.1.7, 4.1.9, 4.1.10 of AP30/30A	SpaceCom not req.	Corresp.	-	§ 4.1.10a - 4.1.10d
AP30-30A/F/C	1 4 5	9.7 AP30#7.1, AP30A#7.1	No.9.52	SpaceCom not req.	Corresp.	-	Nos.9.60-9.62 -
	2	AP30#4.2.3D	§ 4.2.10, 4.2.13, 4.2.14 of AP30/30A	SpaceCom req.	SpaceCom	AP30-30A/F/D	-
AP30-30A/F/C	2	9.7	No.9.52	SpaceCom	Corrosp	-	Nos.9.60-9.62
		AP30#7.1, AP30A#7.1	110.9.52	not req.	Corresp.		-
	All	AP30B#6.5	§ 6.10 of AP30B	SpaceCom not req.	Corresp.	-	§ 6.13-6.15
AP30B/A6A	All	AP30B#6.6	-	SpaceCom not req.	Corresp.	-	-

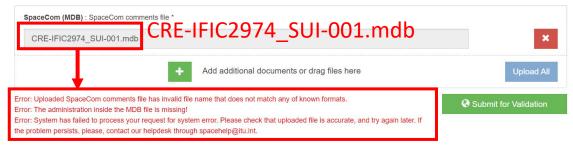
Installation of SpaceCom



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
 - API-IFICxxxx_ADM.mdb
 - SOF-IFICxxxx_ADM.mdb
- CRE-IFICxxxx_ADM.mdb
- PLAN-IFICxxxx_ADM.mdb



Submissions of unacceptable file name are blocked and show 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	â
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
Error: The uploaded SpaceCom comments file is incomplete. Please complete the file on the BR software SpaceCom and validate it before the submission.	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.





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 in order to proceed the process in BR smoothly without confusions.

BR Registry Date	Comments type	IFIC	IFIC date	Status	Click on	Status
16.10.2022	CR/D	2974	28.06.2022	Submitted to BR		Submitted to BR
14.10.2022	CR/D	2974	28.06.2022	Accepted by BR	**	Requested for withdrawal to BF

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.
- Solution The BR registry date of comments submitted after 4 months is shown in red texts to stand out.



Warning!	×
Your submission date is outside the BR IFIC 4 month commenting period and may not be receivable by Bureau.	
Cancel Submit Anyway	

ŀ	BR Registry Date	Comments type	IFIC	IFIC date	Status	Uploaded by
-	16.10.2022	API/B	2973	14.06.2022	Submitted to BR	O ADM.



Submission: e-Submission and e-Communications

- SpaceCom comments shall be submitted to ITU via e-Submission.
- Non SpaceCom comments can be send to notifying Administrations and ITU via e-Communications, email and telefax. (e-Communications is recommended!)
- e-Submission
 - <u>https://www.itu.int/ITU-R/space/e-submission/</u>
 - Users are requested to be registered on the system.
 - Test site: <u>https://www.itu.int/ITU-R/space-submissions/external/wrs/</u>
 - All Administrations can test submissions of SpaceCom comments
- e-Communications
 - <u>https://www.itu.int/itu-r/space/e-communications</u>
 - Users are requested to be registered on the system.
 - Test site: <u>https://www.itu.int/itu-r/e-communications/external/wrs</u>
- User accounts on test sites (common for e-Submission and e-Communications)
 - Username: rtrain_xxx ("xxx" is a symbol of Administration (e.g., F, SUI, AFS)
 - Password: rtrain@itu



Spacecom C	omments
SpaceCom Comments	

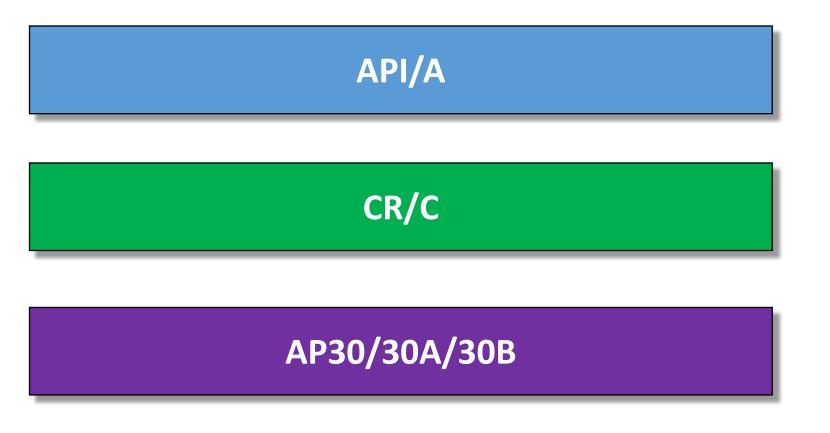
e-Submission site

1	Choose category
	Please choose the category for your correspondence. Click subtitle Note:
ıç	 Multiple categories can be chosen for "Comments and corr Only 1 category can be chosen for other categories. Space network filings and Comments with SpaceCom co filings and SpaceCom comments submitted through e-Co
0	 Comments and correspondence between ADMs
	 Comment to NGSO not subject to Coordination (without SpaceCom file)
	 Comment to GSO and NGSO subject to coordination (without SpaceCom file)
l	 Comment referencing to 9.41 (without SpaceCom file)
	Exclusion of service area of BSS
	 Exclusion from service area (AP30B) under §6.16 of AP30B
	e-Communications site





Commenting on Special Sections







Thank you!

ITU – Radiocommunication Bureau

Questions to

brmail@itu.int

SpaceCom_Support@itu.int

brsas@itu.int (for SpaceCom software)



