UNITED STATES OF AMERICA

PROPOSALS FOR THE WORK OF THE CONFERENCE

Agenda Item 7: *to consider possible changes in response to Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference, advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution* ***86 (Rev.WRC-07)*** *to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary-satellite orbit* (Issue C)

Background Information: There has been a longstanding requirement in Article 9 of the Radio Regulations, under No. **9.1**, for the Radiocommunication Bureau to wait a required six months after receiving the advanced publication information (API) for satellite networks requiring coordination under Section II of Article 9 before accepting the coordination request information, even if both sets of information are submitted to the Bureau (BR) at the same time. While this six-month delay may have served a purpose in years past when there was a substantial amount of technical data included in, the API for administrations to consider and potentially comment upon, this is no longer the case. As a consequence of the simplification of the Radio Regulations at WRC-95, the API for satellite networks requiring coordination under Section II of Article 9 includes very limited information (e.g. orbital position and frequency bands) and, as such, there is little for administrations to review and comment. This required six month delay therefore serves no purpose other than to delay the overall start of coordination process for satellite networks.

In addition to creating a delay to the start of the coordination process, the six-month period adds considerable uncertainty as to the potential availability of frequency assignments at any given orbital location. Whereas the SRS database maintained by the ITU BR can be queried and carefully examined in the process of searching for and identifying a potential orbital location at which a new satellite network could be launched and operated in a given frequency band, once an API for this new network is submitted there is six months of uncertainty as the filing administration must wait to see if another administration, which may have an API in the vicinity that has already been submitted to the ITU and is still valid, files a coordination request in advance of the BR's receipt of the coordination request associated with the new API. Discussion within the ITU-R has revealed that one of the primary reasons for administrations periodically submitting multiple API requests at every 2 or 3 degrees, or even every 6 degrees, around the geostationary orbit is precisely to circumvent this six-month delay between Bureau receipt of the API and CR/C. Six- months after the first "batch" of APIs is accepted by the BR from an administration, the administration is then in a position to subsequently submit a CR/C to the BR at virtually any orbital position. As long as the administration submits the next batch of APIs within 18 months of the first batch this workaround solution continues.

The United States proposes modifications to Article 9 of the Radio Regulations to address the six-month delay between the Bureau receipt of an API and CR/C, which no longer serves a useful purpose. Under the current practice, the BR publishes an API submitted under No. **9.1** within 3 months according to the provisions of No. **9.2B**. Administrations may submit comments within 4 months under No. **9.3**, however, the coordination cannot start any sooner than 6 months after BR receipt of the API. With the six-month delay between API and CR/C, the timing for comments on an API and start of coordination are already in close alignment. A modified scenario with no 6 month delay would allow for coordination to start immediately, even before receiving administration comments under No. **9.3**.

Proposal:

ARTICLE 9

Procedure for effecting coordination with or obtaining agreement of other administrations[1, 2, 3, 4, 5, 6, 7, 8, 8*bis*] (WRC-12)

Section I − Advance publication of information on satellite networks or satellite systems

General

MOD USA/7/1

9.1 Before initiating any action under this Article or under Article **11** in respect of frequency assignments for a satellite network or a satellite system, an administration, or one[9] acting on behalf of a group of named administrations, shall, prior to the coordination procedure described in Section II of Article **9** below, where applicable, send to the Bureau a general description of the network or system for advance publication in the International Frequency Information Circular (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 (see also No. **11.44**). The characteristics to be provided for this purpose are listed in Appendix **4**. The coordination or notification information may also be communicated to the Bureau at the same time~~; it shall be considered as having been received by the Bureau not earlier than six months after the date of receipt of the information for advance publication, where coordination is required by Section II of Article 9~~. Where coordination is not required by Section II, notification shall be considered as having been received by the Bureau not earlier than six months after the date of publication of the advance publication information. (WRC-15~~03~~)

Reasons: To address the unnecessary requirement for the Radiocommunications Bureau to wait six months after receipt of the advanced publication information before receiving the coordination request information for satellite networks requiring coordination under Section II of Article 9.

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9.5B If, upon receipt of the BR IFIC containing information published under No. **9.2B**, any administration considers its existing or planned satellite systems or networks or terrestrial stations[11] to be affected, it may send its comments to the publishing administration, so that the latter may take those comments into consideration~~ when initiating the coordination procedure~~. A copy of these comments may also be sent to the Bureau. Thereafter, both administrations shall endeavor to cooperate in joint efforts to resolve any difficulties, with the

assistance of the Bureau, if so requested by either of the parties, and shall exchange any additional relevant information that may be available. (WRC-2015~~00~~)

Reasons: To address the unnecessary requirement for the Radiocommunications Bureau to wait six months after receipt of the advanced publication information before receiving the coordination request information for satellite networks requiring coordination under Section II of Article 9.