

COMMENTS ON AI 7, ISSUE D PROPOSAL
(REF. WAC/105(20.05.15))

The following reflects comments of IWG-4 on the NTIA draft proposal for Agenda Item 7, Issue D, from Document WAC/105. In the proposal, suggested changes are shown in yellow highlighting. Most changes, but not all, are to align the draft U.S. proposal with the single method for Agenda Item 7, Issue D, that is presented in Section 5/7/4.6 of the CPM Report to WRC-15. Changes proposed to *resolves 3* of Resolution 907, and to *noting a)* of Resolution 908 include changes that are intended to clarify the regulatory text.

* * *

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 D: General use of modern electronic means of communications in coordination and notification procedures

Background Information: Business Communication efficiencies can be achieved by using modern electronic means compared to older technologies, and that there are advantages to using a generic reference to modern electronic means instead of naming specific technologies, e.g., “telegram”, “telex”, and “fax” in regulatory text.

Resolution **907 (WRC-12)** is directly related to this issue and the United States proposes to amend it to ensure that, wherever the words “telegram”, “telex” or “fax” are inserted in provisions related to coordination, ~~and~~ notification and recording procedures of satellite networks (including Articles 9 and 11 of the Radio Regulations and Appendices 30, 30A, and 30B and relevant Resolutions), modern electronic means ~~should~~ be used instead. The BR would also continue to be tasked to implement the resolves part and to report to administrations on such an implementation. The proposed modifications to Res **907 (WRC-12)** preserve the rights of administrations to continue to use the traditional means of communications specified in the Radio Regulations.

Similarly, Res **908 (WRC-12)** deals with electronic submission and publication of advance publication of information. The BR’s SpaceWISC application fulfills the mandate of this Resolution (see Circular Letter CR/376). Building upon this, the United States proposes to expand the scope of this Resolution to all kind of satellite network filings and to request the BR to analyze whether it is possible to have a single consolidated interface for both the submission

Formatted: Font: Bold

Formatted: Font: Bold

Formatted: Font: Not Bold

WAC/123(05.20.15)
IWG-4/057 (20.04.15)

of satellite network filings and the related correspondence (correspondence between the BR and the notifying administration, comments submitted following the publication of the special section, correspondence between administrations about the special section, etc.).

These proposals are substantively aligned with the single method proposed in the CPM ~~text~~ Report for WRC-15 agenda item 7, Issue D.

Proposals:

MOD USA/7/1

RESOLUTION 907 (WRC-1215)

Use of modern electronic means of communication for administrative correspondence related to advance publication, coordination and notification of satellite networks including that related to Appendices 30, 30A and 30B, earth stations and radio astronomy stations

The World Radiocommunication Conference (Geneva, 201215),

considering

that the use of electronic means of communication for administrative correspondence related to advance publication, coordination and notification of satellite networks, earth stations and radio astronomy stations would facilitate the tasks of the Radiocommunication Bureau and of administrations and has the potential to improve the coordination and notification process by reducing the amount of duplicated correspondence,

noting

that Decision 5 (Rev. GuadalajaraBusan, 20142010) includes, in its Annex 2, paragraph 2820, which proposes to “~~Discontinue to the greatest extent possible communications by fax and traditional postal mail between the Union and Member States and replace it with modern electronic communication methods~~move, to the extent practicable, from present communications by fax between the Union and Member States to modern electronic communication methods”,

recognizing

that administrations could use the time freed by a reduction of administrative correspondence to effect coordination,

resolves

1 that modern electronic means of communication shall be used whenever possible in the administrative correspondence between administrations and the Radiocommunication Bureau related to ~~the~~ advance publication, coordination, and notification ~~and recording processes~~, including correspondence related to Appendices 30, 30A and 30B ~~and relevant Resolutions~~, ~~where applicable, to due diligence~~ for satellite networks, earth stations and radio astronomy stations;

2 that, wherever the words “telegram”, “telex” or “fax” are inserted in provisions related to ~~the~~ advance publication, coordination, and notification ~~and recording processes~~ of satellite networks, earth stations and radio astronomy stations, including the provisions contained in Appendices 30, 30A ~~and 30B~~ ~~and relevant Resolutions~~, modern electronic means shall be used ~~instead~~, ~~whenever to the utmost possible~~;

Formatted: Highlight

~~23~~ that ~~the other~~ traditional means of communication ~~referred to in resolves 2~~ ~~shall~~ continue to be used ~~unless the administration informs the Bureau of its willingness to discontinue such use if modern electronic means are not available~~,

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

instructs the Radiocommunication Bureau

- 1 to provide administrations with the necessary technical means to ensure that the modern electronic correspondence between administrations and the Radiocommunication Bureau is secure;
- 2 to inform administrations of the availability of such means and of the associated schedule of implementation;
- 3 to automatically acknowledge receipt of all electronic correspondence;
- 4 to report to the next world radiocommunication conference on the experience gained in the application of this Resolution, with a view to making any necessary consequential amendments to the Radio Regulations,

urges administrations

to use, to the extent possible, modern electronic means of communication in the administrative correspondence between themselves related to advance publication, coordination and notification of satellite networks, including that related to Appendices **30**, **30A** and **30B**, and to earth stations and radio astronomy stations, recognizing that other means of communication may still be used if necessary (see also *resolves 23*).

Reasons: To specifically address replacement of the words “telegram”, “telex”, and “fax” with the generic phrase modern electronic means.

MOD USA/7/2

RESOLUTION 908 (WRC-~~12~~15)

Electronic submission and publication of ~~advance publication information satellite network filings~~

The World Radiocommunication Conference (Geneva, 20~~12~~15),

considering

- a) that the volume of advance publication information (API), ~~coordination requests (CR/C), notification, application of Appendices 30, 30A and 30B~~ ~~on for~~ satellite networks or systems ~~subject to the coordination procedure under Section II of Article 9 of the Radio Regulations~~ has been steadily increasing in recent years;
- ~~b) that this increasing trend may be due in part to the fact that there is no cost recovery fee for these APIs;~~
- e) that the Bureau has also observed that many of the APIs are not followed by a coordination request within the period of 24 months prescribed under No. ~~9.5D~~;
- ~~db) that a significant amount of effort is therefore required to update/maintain the relevant databases by deleting either in total or partially the obsolete APIs;~~

considering further

~~a) that a paperless electronic approach for the submission of APIs on satellite networks filings would make API this information readily accessible to all, and would limit the workload for administrations and the Bureau in the processing of APIs for satellite networks or systems subject to coordination these filings;~~

~~b) that, at the end of 24 month period prescribed in No. 9.5D, the entries will automatically be removed from the list;~~

~~e) that coordination requests that are submitted within the 24 month period, together with relevant API information (date of receipt, nominal orbital position), will then be processed and entered in the SNS database in the normal way;~~

noting

~~a) that the API requested under Section IB of Article 9 of the Radio Regulations contains only a limited amount of information, the most pertinent being the date of receipt of complete information, the frequency bands and, for GSO networks, the orbital position;~~

~~b) that the current API publication will continue to apply to the advance publication of information on satellite networks or systems which are not subject to coordination procedures under Section II of Article 9;~~

a) that, through Circular Letters CR/363 and CR/363376, the Bureau informed administrations about, and that implemented as of 1 March 2015, a web-based application (SpaceWISC), as of 1 March 2015, was developed for the submission and publication of API notices for satellite networks or systems subject to coordination and for the administrations' comments under No. 9.5B;

b) that, through Circular Letter CR/360, the Bureau informed administrations that a web-based on-line distribution of the International Frequency Information Circular BR IFIC (Space services) on DVD-ROM in ISO format was developed, allowing the data to be available without delay on the BR IFIC publication date and administrations to get a secure local reproduction of the BR IFIC (Space services) DVD-ROM,

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

Formatted: Highlight

resolves

that administrations shall submit API all satellite network filings, under Articles 9 and 11 as well as Appendices 30, 30A, 30B and relevant Resolutions, using a secure paperless electronic approach upon being advised that the means for such an electronic submission of API a satellite network filing for satellite networks or systems subject to coordination has been implemented and upon receiving assurances that such means are indeed secure,

Formatted: Highlight

instructs the Director of the Radiocommunication Bureau

1 to implement a secure paperless electronic approach for the electronic submission and publication of API satellite network filings for satellite networks or systems subject to coordination, taking into account the conditions mentioned in the resolves of this resolution;

2 to study and implement, as appropriate, a consolidated approach for both the electronic submission of satellite network filings and their related correspondence.

Reasons: To 'extend' Res 908 (WRC-12) from the successfully implemented secure paperless electronic approach for submission and publication of APIs (SpaceWISC) to all satellite network filings.