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# 4th EACO Preparatory Meeting for WRC-23

**28 February 2022**

## Agenda Item 7

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**SES**

## Agenda Item 7

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### *AI 7 (WRC-07)*

*to consider any proposals which **deal with deficiencies and improvements** in the advance publication, **coordination, notification and recording procedures** of the Radio Regulations for frequency assignments pertaining to space services **which have either been identified by the Board and included in the Rules of Procedure or which have been identified by administrations or by the BR, as appropriate;***

*to ensure that these procedures, and the related appendices of the Radio Regulations reflect the latest technologies, as far as possible*

## Agenda Item 7 – in general

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### □ SES & Intelsat positions

- We support the current process of continuing evolution at successive WRCs of the regime governing space services, supporting the standing Agenda item 7 for each WRC improving the regulations by each WRC
- We favour a stable and predictable regulatory framework for efficient use of spectrum and orbit resources
- that enables efficiency for notifying administrations of satellite networks and systems to increase transparency and ease the regulatory burden
- In Agenda Item 7 specifically, we favour the review of RR provision bringing accurate solutions to specific detected inconsistencies i.e. well characterized problems addressed Topic by Topic, in order to avoid unintended consequences
- In addition to considering RR changes, we generally also support to in parallel explore if coordination solutions can address encountered problems on a case-by-case basis

## Identified Agenda Item 7 Topics so far in WP 4A...

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Topic A – Tolerances for non-GSO orbital characteristics

Topic B – Non-GSO BIU post-milestone procedure

Topic C – Protection of GSO MSS from non-GSO emissions in 7/8 & 20/30 GHz

Topic D – Modifications to Appendix 1 to Annex 4 of AP 30B

Topic E – Improved procedures in AP 30B for new ITU Member States

Topic F – Excluding uplink service area in AP 30A for Regions 1 & 3 and AP 30B

Resolution 559 – new BSS Plan submissions for degraded BSS assignments

Topic G – Resolution 770 on GSO protection from single entry non-GSO in Q/V bands



## Topic A – Tolerances for non-GSO orbital characteristics

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*Studies to determine notified vs. actual tolerances for 4 orbital characteristics of NGSO space stations in the FSS, MSS and BSS: Apogee and Perigee Altitudes, Inclination and Argument of Perigee.*

### □ SES & Intelsat positions

- We support the development of the definition of tolerances limited to the four orbital characteristics of non-GSO space stations in FSS, BSS and MSS identifying a “notified orbital plane”, as an expected continuation of the important work of WRC-19
- In the absence of such tolerances it is unclear whether the requirements of BIU and the milestone-based approach Resolution 35 (WRC-19) are met
- To avoid collision with another non-GSO space station or to permit re-organisation of satellites in an orbit-plane after a launch of new non-GSO space stations, we support specific regulatory measures to temporary exceed the defined tolerances if final tolerances definition could not address such operational requirements
- We support the development of appropriate regulatory consequences for frequency assignments to non-GSO space stations that do not maintain these orbital tolerances
- Hence we support the African Common Position, Recommendations and Way forward as concluded by APM23-3 in September 2021

## Topic B – Non-GSO BIU post-milestone procedure

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*Studies to develop NGSO post-milestone procedure aimed at defining acceptable reductions of the number of satellites deployed into a notified orbit, as compared to its ITU filing.*

### □ SES & Intelsat positions

- We support the development of final post-milestone procedures at WRC-23 to replace temporary post-milestone procedures contained in the Resolution 35 (WRC-19) in *resolves* 19, as an expected continuation of the important work of WRC-19
- We support to develop a new Resolution to replace *resolves* 19 of Resolution 35 , and to suppress that *resolves* 19 and leave the rest of the Resolution 35 as it is
- This new Resolution should permit some temporary flexibilities on the real number of non-GSO satellites deployed compared to the number of satellites contained in the MIFR, by aligning the post milestone procedures in this new Resolution with No. 11.49 and Resolution 35. Targeting a procedure that would allow a reduction of satellites deployed compared to the number of satellites notified in the MIFR for a maximum period of 3 years without alignment of the number of satellites notified in the MIFR
- This means that we do not consider application of only No. 13.6 by the BR as an adequate solution for Topic B
- We support the development of appropriate regulatory consequences for frequency assignments to non-GSO space stations that do not respect these post-milestone procedures.
- Hence we support the African Common Position, Recommendations and Way forward as concluded by APM23-3 in September 2021, and specifically the Part D summary of the on-going study work Nb. 1 , that “Having post-milestone procedures in place relieves the BR of the burden to conduct an investigation under No. 13.6 of the RR”

## Resolution 559 – new BSS Plan submissions for degraded BSS assignments

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*In the Agenda Item 7 debates in WP 4A, there are several Topics and items considering Planned bands, i.e. development relevant for RR Appendixes 30, 30A and 30B. Part of these debates concerns the very important development on implementing Resolution 559 (WRC-19) whereby 45 administrations with degraded BSS assignments have made new BSS Plan submissions in an attempt to replace their original BSS Plan assignments with new assignments.*

### □ SES & Intelsat positions

- We fully support to diligently address the situation for the identified 45 administrations having degraded BSS assignments, as targeted by WRC-19
- We applaud the tremendous efforts made by the BR facilitating and assisting all administrations involved in the coordination and have understood from the BR that these coordinations are generally progressing well
- We also note that “in this connection both parties are encouraged to make utmost efforts to communicate with each other and to timely reply in order to remove incompatibilities” as mentioned in the last WP 4A’s Note to the BR Director (Annex 32 of 4A/552)
- We too certainly encourage all administrations having received coordination requests based on Resolution 559 to make utmost efforts to timely engage in these coordinations and we ensure to contribute by taking all changes to actively promote progress in these bilateral coordinations
- We note that this will also address other Agenda Item 7 Topics, as mentioned in Part B of the APM23-3 outcome on Topic F from September 2021 “This Topic was proposed by African countries to the last Working Party 4A held in July 2021 as a result of challenges encountered during the implementation of Resolution 559.”



## Topic E – Improved procedures in AP 30B for new ITU Member States

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*Studying the discrepancy between the procedures for the addition of a new allotment to the Plan for a new ITU Member State, and the procedures for converting allotments into assignments for those Member States which do not have any assignments in the Appendix 30B List, or under coordination.*

### □ SES & Intelsat positions

- We fully support the possibility to grant new ITU Member States the same privileges as those granted to administrations having no assignments in the Appendix 30B List, or under coordination, as adopted in Resolution 170 (WRC-19)
- We further understand that this is not to be considered the single measure to be taken to address this fully recognized problem
- We would therefore welcome further inputs and assessments of the current problematic situation in order to find the best regulatory solution to facilitate equitable spectrum access to obtain national allotment rights for new ITU Member States
- We would support additional technical analysis of the interference scenarios for new ITU Member States and we stand ready to support such study efforts and would very much welcome cooperation with ITU Member states
- We also support to explore if coordination solutions can address encountered problems on a case-by-case basis
- Hence we support the Recommendations and Way forward as concluded by APM23-3 in September 2021, specifically to “**Encourage** new ITU Member States and interfered with administrations to actively undertake and cooperate in coordination discussions to resolve any interference cases;”
- But we are not aligned with the African Common Position to “**Support** the ideas proposed in the option three that was submitted to the Fourth meeting of WP4A that took place in July 2021 by the Administrations concerned by Article 7”



## Topic F – Excluding uplink service area in AP30A and AP30B

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*For the Planned bands downlink, there are RR provisions that facilitate an Administration or a group of named Administrations to coordinate the downlink, but it is not the case for the feederlink/uplink. Hence Topic F was proposed by African countries to the July 2021 WP 4A as a result of challenges encountered during the implementation of Resolution 559.*

### □ SES & Intelsat positions

- We understand and support the legitimate concerns expressed and support developing specific measures to avoid creating obstacles to establish space systems over national territories
- But the proposals so far submitted to WP 4A do unfortunately not seem feasible to technically implement avoiding unintended consequences
- For example, aligning the coverage area with the service area is not always feasible
- Therefore, additional technical analysis are required to define possible, specific measures to address these legitimate cases and we stand ready to support such study efforts and would very much welcome cooperation with ATU Member states
- In addition to consider RR changes addressing such specific inconsistencies, we also support to explore if coordination or national licensing conditions solutions can address encountered problems on a case-by-case basis
- Hence we agree with the 1. Note the African Common Position concluded by APM23-2 in September 2021 and with the principles portrayed, but not necessarily with the 2. Proposal considering a) allowing administrations to exclude its national territory from the service area of satellite networks, and specifically not with b) to shape the coverage with the service area, as it may not be technically feasible to implement in some cases