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Mongolia

**preliminary views on WRC-19 agenda item 7**

**Agenda Item 7:**

*To consider possible changes, and other options, in response to Resolution****86 (Rev. Marrakesh, 2002)*** *of the Plenipotentiary Conference, an advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution****86 (Rev.WRC‑07)****, in order to facilitate rational, efficient and economical use of radio frequencies and any associated orbits, including the geostationary‑satellite orbit.*

# General

**1. Background**

The advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks are the regulatory foundation for space services. In application of these procedures, a number of issues were observed by various administrations. Administrations and the Bureau have been contributing to the improvement of the satellite network procedures, eliminating the deficiencies thereof and transforming the provisions in the Rules of Procedures into the Radio Regulations (RR).

In the implementation of Resolution **86** (Rev. Marrakesh, 2002), WRC-19 is invited by Resolution **86** (Rev. WRC-07) to consider, under the standing Agenda Item 7, any proposals which deal with deficiencies and improvements in the Regulatory/Procedural matters for frequency assignments pertaining to space service, ensuring these procedures, and the related Appendices of the Radio Regulations support latest technologies and regulatory practices, as far as possible.

**2. Preliminary Views**

The administration of Mongolia intends to develop the National allotments for the Mongolian National Satellite program which was approved by the Government of Mongolia in 2013. Mongolia considers it necessary further improvements in the notification, coordination and recording procedures for frequency assignments to satellite networks in different services in order to ensure equitable access of ITU Member States to orbital and frequency resource.

**Issue B: Ka-band coordination arc - FSS vs other services**

**1. Background**

This issue considers the introduction of the coordination arc criteria as the coordination trigger between fixed-satellite service (FSS) & mobile-satellite service (MSS) geostationary satellite networks and between MSS geostationary satellite networks in the Ka band.

Based on the current regulatory situation, the bands 29.9-30 GHz (Earth-to-space)/20.1-20.2 GHz (space-to-Earth) are allocated to the MSS and FSS both on a primary basis in all 3 Regions. The bands 29.5-29.9 GHz (Earth-to-space)/19.7-20.1 GHz (space-to-Earth) are also allocated to the MSS and FSS on a primary basis, but only in Region 2. To determine whether coordination under RR No. **9.7** is required, the following criteria are applied:

* FSS vs FSS: Coordination arc of 8º
* FSS vs MSS: ΔT/T > 6%
* MSS vs MSS: Δ*T/T* > 6%

In addition, in the FSS vs FSS coordination, Administrations can request application of RR No. **9.41** to include additional satellite networks that would be affected taking into account the Δ*T/T* > 6% criteria.

Considering that some characteristics of MSS earth stations are similar to those used by the FSS earth stations in the frequency bands 29.9-30 GHz (Earth-to-space)/20.1-20.2 GHz (space-to-Earth) in all 3 Regions and 29.5-29.9 GHz (Earth-to-space)/19.7-20.1 GHz (space-to-Earth) in Region 2, this issue studies the possibility of introducing the coordination arc concept to determine the coordination requirements between MSS and FSS geostationary satellite networks and between MSS geostationary satellite networks.

**2. Mongolian Preliminary Views**

The Administration of Mongolia considers that applying the coordination arc criterion would increase the efficiency of coordination procedure while maintaining the possibility to apply the RR No.9.41. Mongolia is of the view to support the Method B2 in the draft CPM19-2 report text.

**Issue C1: AR11 and AP30/30A/30B discrepancies**

**1. Background**

Further review of the provisions dealing with any changes to the characteristics of an assignment submitted under provisions of RR No. **11.43A** of RR Article **11**, and that submitted under paragraph 8.13 of Article 8 of RR Appendix **30B** and confirmed as having been brought into use, reveals that there is a regulatory inconsistency between the objectives of the two provisions/paragraph as follows:

*“8.13 A notice of a change in the characteristics of an assignment already recorded, as specified in Appendix****4****, shall be examined by the Bureau under § 8.8 and § 8.9, as appropriate. Any changes to the characteristics of an assignment that has been notified and confirmed as having been brought into use shall be brought into use within eight years from the date of the notification of the modification. Any changes to the characteristics of an assignment that has been notified but not yet brought into use shall be brought into use within the period provided for in §§ 6.1, 6.31 or 6.31bis of Article 6.    (WRC‑12)”*

*“11.43A A notice of a change in the characteristics of an assignment already recorded, as specified in Appendix 4, shall be examined by the Bureau under Nos. 11.31 to 11.34, as appropriate. Any change to the characteristics of an assignment that has been recorded and confirmed as having been brought into use shall be brought into use within five years from the date of the notification of the modification. Any change to the characteristics of an assignment that has been recorded but not yet brought into use shall be brought into use within the period provided for in No. 11.44.    (WRC‑07)”*

It is to be emphasized that the concept of the text of paragraph 8.13 of Article 8 of RR Appendix **30B** was borrowed/taken from provisions of RR No. **11.43A** of RR Article **11**. However, in so doing an important element as contained in RR No. **11.43A** which referred to any change to the characteristics of an assignment that has been *recorded* and confirmed as having been brought into use was changed to *notified* and confirmed as having been brought into use*,* which is quite different.

An assignment may be notified but due to one or other reasons not yet recorded in the MIFR, but the notifying administration might have brought that assignment into use and its date of bringing it to use might have been confirmed.

It is also worth mentioning that an assignment may be notified but being returned to its notifying administration on relevant regulatory grounds. That assignment shall not be benefited as being recorded.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C2: Frequency bands submitted under AP30B Article 6**

**1. Background**

RR Appendix **30B** consists of two blocks/sub-bands of 250 MHz each in 10-11 GHz frequency range, i.e. 10.70-10.95 GHz and 11.2-11.45 GHz. Submission from administrations when applying Article 6 of RR Appendix **30B** for additional use usually covers both blocks/sub-bands of 250 MHz mentioned above or may only submit either of the two blocks for additional use either 10.70-10.95 GHz or, 11.2-11.45 GHz or while successfully applying Article 6 for the two blocks/sub‑bands, when applying Article 8, only bring into use one block/sub-band of the 10-11 GHz.

There is no provision in the Appendix prohibiting, strictly speaking, to allow Administration to submit an application for one of the blocks/sub-bands in an explicit submission of one of the blocks/sub-bands under RR Appendix **30B**. This concept is analogous to that stipulated in footnote 4 associated with paragraph 6.1 of Article 6 of the Appendix. However, there is no specific provision authorizing that application when submitting RR Appendix **4** for either of two sub-bands.

The Rules were established during 90th in order that a dispute between two administrations relating the use of the entire bands (two blocks/sub-bands) on a given orbital position be satisfactorily resolved. The adoption of the Rules mentioned above permitted each of these two administrations using one of the two blocks/sub-bands, each of 250 MHz be used at two closely orbital positions.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C3: AP30B MOD to Article 6 No. 6.10**

**1. Background**

According to RR Appendix **30B**, Administrations may submit their new frequency assignment(s) whether to convert their national allotment to assignment or to introduce some additional use.

The majority of the additional uses either have:

1) a global service Area or in some case regional or;

2) a sub-regional service area with global coverage.

In 1) above, pursuant to application of paragraph 6.6 of Article 6 of RR Appendix **30B** and in conduction with paragraphs 6.13 to 6.15 of the same Article, agreement may reached or not succeeded.

Cases may arise that for a given satellite network, say covering the globe, out of some double or triple figure of countries, many fall under the application of 6.16. It might happen that the countries disagreed spread over the globe in an irregular manner, i.e. the disagreed countries are not contiguous territories.

To explain how territories of the disagreed countries will be protected in the future via a vis their existing networks from operational view points since the satellite continues to cover those countries even if the test points of the networks were eliminated from the territories of those objecting countries, it is worth noting that actually there are two categories to get agreement from affected administrations:

1. The first category is based on interference calculation (PFD and C/I, see § 6.3 and § 6.5 § 6.19c) and §§ 6.21, 6.22 of Appendix**30B**), irrespective of the territory of an administration to be in or out of the service area of the new network. The purpose of these examinations is to ensure that the allotment, the assignments and radio communication services of other Administrations are fully protected.

Any services of an administration would be considered to be affected and agreement would be required when the potential interference from a newly proposed network exceeds the corresponding criteria in Annex 3 and Annex 4 of Appendix**30B** as well as in RR Articles **21** and **22**.

If not identified in the examination, national allotment in the Plan as well as other services would be considered protected. If identified, it would be the obligation of the notifying administration of the new network to seek required agreement.

2. The second category is the examination under §6.6 of Appendix**30B**. Without agreement from a country, its territory will be excluded from service area of the proposed new network when the notifying administration will request to include the network in the List. The other characteristics of the network, including the coverage, can be kept without modification. Therefore, it could find in BR Publications some networks with global coverage but a very small service area (in some cases, only some tiny isolated territories). This examination does not give any consideration to interference issue.

In summary, according to current Radio Regulations, the protection of the radio communication services are implemented through the first category of examinations and the corresponding coordination/agreement-seeking procedures, not through the examination under § 6.6 or the application of § 6.16 of Appendix**30B**. It would be noted that § 6.13 to § 6.15 of Appendix**30B** does not apply to the agreement requested under § 6.6 of Appendix**30B**.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C4: AP30/30A single AP4 notice for List and Notification**

**1. Background**

This issue studies the possible amendments to RR Appendices 30 and 3**0**A to allow submission of one RR Appendix **4** data set to be treated both in respect of entry into the List (§ **4.1.12**) and Notification (§ **5.1.1** and **5.1.2** of RR Appendices **30** and **30A** respectively).

Typically, at the end of the coordination process for Regions 1 and 3 under Article 4 of RR Appendices **30** and **30A** and when a network is about to be implemented, systems are submitted for entry into the List under § **4.1.12** and for Notification under §§ **5.1.1** and **5.1.2** of RR Appendices **30** and **30A**, respectively at the same time. This is logical since both these two provisions refer to actions following the completion of the coordination process and since they are both required to implement the network.

It would therefore reduce the workload of both administrations and the Bureau if one physical submission could be treated as, and examined in respect of both these provisions. In respect of RR Appendix **30A**, it would seem that this would be in particular of value for notification of receiving space stations and typical earth stations while specific earth stations probably in many cases would be subject to separate notices as the requirements change with time.

Looking at the RR Appendix **4** information required for submission under § **4.1.12,** § **5.1.1** and § **5.1.2**, these would seem to be identical for entry into the List and notification. The data requirements of RR Appendix **4** therefore should not create any practical difficulties in achieving this goal.

At the last meeting of WP4A, it was recognized that this issue is straightforward. Hence, WP4A meeting decided to group this issue with other straightforward issues under Issue C, for which consensus was easily reached and for which a single “method” was proposed, as sub-topic Issue C4.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C5: MOD to No. 11.46 and six-month resubmission**

**1. Background**

Pursuant to RR No. **11.46**, the Bureau allows Notifying Administrations six months to resubmit their notified frequency assignments which were returned due to an unfavorable finding with respect to RR Nos. **11.32**, **11.32A** or **11.33**. Any notification resubmitted beyond six months is considered as a new notification with a new date of receipt and would be subject to cost recovery fees. However, neither RR No. **11.46** nor any other provision in the Radio Regulations requires the Bureau to send a reminder to the Notifying Administration at any point during the six-month period. If the Notifying administration resubmits the notice to the Bureau beyond the required six-month period, the Bureau assigns a new date of receipt and reviews whether the notice complies with the period in RR No. **11.44.1** or RR No. **11.43A** and takes the appropriate action. In the case that a notice resubmitted beyond the six-month deadline is receivable, cost recovery fees would be required for the resubmitted assignments. Addressing this lack of a reminder would be beneficial to Administrations who may have experienced difficulties receiving or addressing the Bureau’s return of notice and the need to ensure that frequency assignments that are in use are properly recorded in the Master Register.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C6: AP30B single AP4 notice for List and Notification**

**1. Background**

Normally, at the end of the coordination process under Article 6 of RR Appendix **30B** and when a network is about to be implemented, systems are submitted for entry into the List under § 6.17 and for Notification under § 8.1 at the same time. This is logical since both these two provisions refer to actions following the completion of the coordination process and since they are both required to implement the network.

Enabling, as an option, administrations to submit one notice and request in a letter to the Bureau that it should be treated both in respect of entry into the List and Notification would simplify the processing and reduce the workload of the Bureau and administrations. However, this is not possible under the current provisions of RR Appendix **30B** (§ 6.17).

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

**Issue C7: AP30B temporary agreements**

**1. Background**

Taking into account that the possibility of obtaining agreement from affected administrations for a specified period would considerably facilitate the tasks of those administrations applying Article 4 of RR Appendices **30** and **30A** as well as Article 6 of RR Appendix **30B**, it is proposed to amend RR Appendix **30B** to be harmonized with RR Appendices **30** and **30A** for Regions 1 and 3 and that for Region 2.

**2. Mongolian Preliminary Views**

Mongolia is of the view to support the single method of the draft CPM Report text which provides clarity to the Radio Regulations.

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