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Socialist Republic of Viet Nam

**preliminary views on WRC-15 agenda items 1.6, 7, 9.1.2**

# Agenda Item 1.6:

*to consider the development of a regulatory framework for non-GSO FSS satellite systems that may operate in the frequency bands* *37.5-39.5 GHz (space-to-Earth), 39.5 42.5 GHz (space‑to‑Earth), 47.2-50.2 GHz (Earth-to-space) and 50.4-51.4 GHz (Earth-to-space), in accordance with Resolution* ***159 (WRC-15)****;*

Resolution **159 (WRC‑15)–** Studies of technical, operational issues and regulatory provisions for non-geostationary fixed-satellite services satellite systems in the frequency bands 37.5-39.5 GHz (space-to-Earth), 39.5-42.5 GHz (space-to-Earth), 47.2‑50.2 GHz (Earth-to-space) and 50.4-51.4 GHz (Earth-to-space)

**1. Background**

The frequency bands 37.5-39.5 GHz (space-to-Earth), 39.5-42.5 GHz (space-to-Earth), 47.2‑50.2 GHz (Earth-to-space) and 50.4-51.4 GHz (Earth-to-space) are allocated to fixed-satellite services. In the FSS, there are GSO satellite networks and non-GSO satellite systems operating and/or planned for near-term operation in the frequency band allocated to the FSS in the range 37.5-51.4 GHz.

There are currently no regulatory provisions for sharing between non-GSO systems and GSO networks in the 50/40 GHz frequency bands. In addition, there are no mechanisms in the RR establishing coordination procedures applicable to non-GSO systems operating within the FSS and BSS allocations in frequency bands in the 37.5 to 51.4 GHz frequency range.

ITU-R studies in the 50/40 GHz frequency bands have been conducted on sharing between non-GSO systems and GSO FSS and BSS networks. These studies concluded that developing epfd limits based on the operational parameters for a single, specific, non-GSO system results in spectrum inefficiencies for other non-GSO systems.

In addition, there may not be an agreement on epfd limits, there is general consensus that it is possible to achieve compatibility in the 50/40 GHz frequency bands that would allow non-GSO FSS systems to operate while ensuring protection to GSO satellite networks in the FSS, MSS, and BSS, based on a decrease in availability and capacity loss.

Four methods have been proposed to respond to this agenda item in the draft CPM Report.

In addition, Resolution **238 (WRC-15)** calls for studies to determine the spectrum needs for the terrestrial component of IMT in the frequency range between 24.25 GHz and 86 GHz, as well as sharing and compatibility studies, taking into account the protection of services to which the frequency band is allocated on a primary basis, for the frequency bands:

– 24.25-27.5 GHz, 37-40.5 GHz, 42.5-43.5 GHz, 45.5-47 GHz, 47.2-50.2 GHz, 50.4‑52.6 GHz, 66-76 GHz and 81-86 GHz, which have allocations to the mobile service on a primary basis; and

– 31.8-33.4 GHz, 40.5-42.5 GHz and 47-47.2 GHz, which may require additional allocations to the mobile service on a primary basis.

**2. Preliminary Views**

Taking the spectrum needs into account for the terrestrial component of IMT in the frequency range between 24.25 GHz and 86 GHz, Viet Nam does not support the consideration of the bands considered under AI 1.6 for non-GSO FSS satellite systems.

Considering the result of sharing study between non-GSO systems and GSO networks, Viet Nam is of the view that: support having the method No change to Radio Regulations.

**Agenda Item 7:**

*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;*

Resolution **86 (Rev.WRC‑07)** – *Implementation of Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference*

**Issue C – Issues for which consensus was achieved in ITU-R**

Issue C1 - Inconsistency between provisions of RR No.11.43A of RR Article 11 and paragraph 8.13 of Article 8 of RR Appendix 30B

**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 RRNo. **11.43A** of RR Article **11**. However, in so doing an important element as contained in RRNo. **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. Preliminary Views**

Viet Nam supports the single method to address this issue by aligning the text of paragraph 8.13 of Article 8 of RR Appendix **30B** with that of RR No. **11.43A** of RR Article **11** while ensuring that this alignment should not impact on any other current regulatory practice.

Issue C2 - Clarification of the possibility to notify/bring into use only one of the blocks/one sub-band under AP30B Article 6

**1. Background**

RR Appendix **30B** consists of two blocks/sub-bands of 250 MHz each in 13-11 GHz band, i.e. 10.70‑10.95 GHz, 11.2-11.45 GHz for downlink and 12.75-13.0 GHz, 13.0-13.25 GHz for uplink. 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 or while successfully applying Article 6for the two blocks/sub‑bands, when applying Article 8, only bring into use one block/sub-band of the 13-11 GHz.

There is no provision in the Appendix prohibiting, strictly speaking, to allow Administrations 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. Nevertheless, the Rules of Procedure relating to paragraphs 6.5 of Article 6 of the RR Appendix**30B** in its sub paragraph 1 stipulates that:

Quote

*“1 The planning exercise and the interference analysis were made by WARC Orb-88 for the whole band of 300 MHz (6/4 GHz) or 500 MHz (13/11 GHz) on a co-channel basis. It may happen that two administrations conclude agreement on the shared use of the frequency bands. In the compatibility examination by the Bureau, the mutual interference between non-overlapping frequency assignments shall not be taken into consideration in formulating findings”*

Unquote

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. Preliminary Views**

Viet Nam supports a single method as described in § 3/7/3.4.2 of CPM report.

Issue C3 - AP30B MOD to Article 6 No. 6.10

**1. Background**

Issue C3 addresses the consequences for not replying to the letters from the Bureau initiated by a request for its assistance by a notifying administration seeking the inclusion of the territory of a foreign administration under §6.6 of RR Appendix**30B**.

An administration intending to convert an RR Appendix **30B** allotment into an assignment, introduce an additional system[[1]](#footnote-1) or modify the characteristics of an assignment in the Appendix **30B** List must submit the information specified in Appendix **4** to the Bureau. Following the receipt of the notice, the Bureau examines and publishes it in a special section of the BR IFIC. Among other things, this special section can contain two types of requirements to seek and obtain the agreement of those affected administrations whose:

– allotments in the Appendix **30B** or assignments in the Appendix **30B** List or those already examined by the Bureau (requirements identified under § 6.5 of Appendix **30B**), or

– territories have been included in the service area of the assignment under consideration (requirements associated with §6.6 of Appendix **30B**).

It is important to note that under the current regulatory framework, there is a specific provision (§ 6.13) in Appendix **30B** to seek the assistance of the Bureau in case of a non-response of an affected administrations identified under § 6.5 of Appendix **30B** within the four-month comment period. In case of a non-response to the letters from the Bureau initiated under § 6.13, 6.14 and 6.14*bis* of Appendix **30B**, it will be deemed that this administration, identified under § 6.5 of Appendix **30B** has agreed as per § 6.15 of Appendix **30B**. However, none of the provisions referred above (§ 6.13 to 6.15) applies in the case of affected administrations identified under § 6.6 of Appendix **30B**. In fact, there is not a single regulatory mechanism in Appendix **30B** to seek the assistance of the Bureau in this case. For a request for the assistance of the Bureau on issue relating to the inclusion of the territory of an administration, the notifying administration, in its request to the Bureau and the Bureau, in its subsequent letters to the affected administration, have to invoke RR No. **13.1** for this matter. Furthermore, the current Radio Regulations do not specify any action from the Bureau with respect to an administration that did not respond to any of its letters initiated under RR No. **13.1**. This implies that the inclusion of the territory of an administration identified under § 6.6 of RR Appendix **30B** can only result from a formal agreement of this administration and, in no circumstance, results from a non-response to neither the original request for inclusion of its territory nor any subsequent letters from the Bureau on this matter.

**2. Preliminary Views**

Viet Nam supports the single method to add a new provision in Article 6 of RR Appendix **30B** to clearly state that § 6.13 to 6.15 of RR Appendix **30B** do not apply in the context of requirements associated with §6.6 of RR Appendix **30B**.

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

**1. Background**

Normally, 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 and § 5.1.1/5.1.2, 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.

**2. Preliminary Views**

Viet Nam supports a single method to modify §4.1.12*bis* to allow administrations to request the Bureau to examine the submission made under §4.1.12 also in respect of notification under §5.1.1.

**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 unfavourable 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. Preliminary Views**

Viet Nam supports the single method addressing the lack of a reminder when Bureau allows notifying administrations six months to resubmit their frequency assignments under RR **No. 11.46.**

Issue C6 - Single AP4 notice for entry into the RR Appendix 30B List (under § 6.17) and Notification (under § 8.1)

**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). In addition, the data items required for the submission under § 6.17 and for Notification under § 8.1 are not the same.

**2. Preliminary Views**

Viet Nam is of the view that one notice and request in a letter to the Bureau for entry into the List under §6.17 and for notification under §8.1 of RR Appendix **30B** could reduce workload of both administration and the Bureau. Therefore, Viet Nam supports a single method.

**Issue C7 - Harmonization of AP30B with AP30/30A on Possibility of Obtaining Agreement for a Specific Period**

**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 Appendices **30A** and **30B** to be harmonized among RR Appendices **30**, **30A** and **30B**.

**2. Preliminary Views**

Viet Nam supports a single method which would add a new provision 6.15*bis* to Article 6 and a new provision §8.16bis to Article 8 of RR Appendix **30B** in order to recognize the possibility of obtaining agreement from affected administrations for a specified period.

Issue D – Identification of those specific satellite networks and systems with which coordination needs to be effected under RR Nos. 9.12, 9.12A and 9.13

**1. Background**

The 2012 World Radiocommunication Conference (WRC-12) decided to modify RR No. **9.36.2** to Article **9** of the Radio Regulations. Following this provision, the Bureau now publishes a “definitive list” of those networks, systems and earth stations with which coordination under RR Nos. **9.7**, **9.7A**and **9.7B**needs to be effected once a coordination request (a new one or a modification to an existing one, as appropriate) for a satellite network or system is processed. Such a list is published in the relevant Special Section of the BR International Frequency Information Circular (BR IFIC).

The above-mentioned provision (RR No. **9.36.2**) is very useful, because, in the cases of coordination under RR Nos. **9.7**, **9.7A**and **9.7B**, it reduces the administrative workload of identifying the names of specific satellite networks, systems and earth stations with which a new satellite network or system needs to effect coordination.

However, in the cases of coordination under RR Nos. **9.12**, **9.12A** and **9.13**, the Bureau does not publish a list of the satellite networks or systems potentially affected to complement the list of administrations potentially affected by incoming satellite networks or systems that they do provide.

Three methods have been identified to satisfy this issue.

**2. Preliminary Views**

Viet Nam supports method D2

Under this method, it is proposed to add the requirements to have:

a) a pre-compiled list of potentially affected satellite networks and/or systems, published for information only, included in the CR/C Special Section for coordination under RR Nos. **9.12**, **9.12A** and **9.13**, by stipulating it in RR No. **9.36.1**;

b) the definitive list of affected satellite networks or systems to be considered when effecting coordination under RR Nos**. 9.12**, **9.12A** and **9.13**to be included in the CR/D Special Section by stipulating it in RR No. **9.53A**.

Issue E: Resolution related to RR Appendix 30B

**1. Background**

ITU-R considered studies relating to the Enhancement of Regulatory Provisions of RR   
Appendix 30B to observe the principles based on which it was initially established for Regions 1and 3 with that of Region 2.

An administration which decides to convert its National Allotment into assignments in an economically viable manner very often needs to modify the initial characteristics of its National allotments, taking into account the latest available development and advancement in technology as well as the most economically viable solution.

In so doing, a) when the request for conversion is submitted, the application would be queued at the end of the last submission received before it and b) once its turn to be processed is reached, due to the nature of those additional systems/uses it would be extremely difficult, if not totally impossible, to succeed coordination within the regulatory deadline. In summary, as it could be noted from the above, the probability that an administration could successfully complete coordination for the conversion of its national Allotment to assignments with characteristics beyond the initial allotment within that regulatory period is very low.

**2. Preliminary Views**

Viet Nam supports a new resolution with regards to additional measures for satellite networks in the fixed-satellite service in frequency bands subject to Appendix 30B for the enhancement of equitable access to these frequency bands

Issue K – Difficulties for Part B examinations under § 4.1.12 or 4.2.16 of RR Appendices 30 and 30A and § 6.21 *c)* of RR Appendix 30B

**1. Background**

Examination under RR Appendix **30B** § 6.21 c) is based on theassignments for which the Bureau has previously received complete information in accordance with § 6.1 (i.e. Network SR-Part A) even though the Network SR-Part B has already been published under § 6.23 or § 6.25 with much reduced characteristic (e.g. reduced service area and coverage area) and from that Part B publication, Network SR-Part A no longer exists in the AP**30B** databases.

This creates difficulties to the notifying administration and may prevent its notice submitted under § 6.17 (Network JR-Part B) from entering into the List with favourable findings as the examination of its submission in respect of the senior network (Network SR-Part A) is unfavourable even though in reality, its network (Network JR-Part B) can co-exist with the senior network in the List (Network SR-Part B) and if examination in respect of Network SR is based on its Part B, examination result will become favourable.

**2. Preliminary Views**

Viet Nam supports method A which adds one more examination under §4.1.12 and 4.2.16 of RR Appendix **30** and**30A** and§ 6.21 c) of RR Appendix **30B** such that should any remaining affected networks whose assignments have been entered in the List before the submission under§4.1.12 and 4.2.16 of RR Appendix **30** and **30A** or § 6.17of RR Appendix **30B**, the Bureau shall further examine if the remaining corresponding assignments in the List are still considered as being affected.

Issue M – Simplified regulatory regime for non-GSO satellite systems with short duration missions

**1. Background**

At WRC-15 a proposal for a new agenda item for WRC-19 “to consider modifications to the regulatory procedures for notifying satellite networks to accommodate nanosatellite and picosatellite missions”was submitted.WRC-15 decided not to include this as an item on the WRC-19 agenda, and concluded that this matter could best be dealt with by the ITU-R under the standing WRC agenda item 7.

Considering that the size of a satellite is independent of the nature of the service that it is intended to provide, a simplified regulatory regime has been developed for satellites with short duration missions,independent of the size of the satellite.

Based on the above, ITU-R developed a method to address this issue that consists of modifications to the existing regulatory procedures for advanced publication and notification of satellite networks and systems that are not subject to Section II of RR Article **9** to facilitate the recording of non-GSO satellite systems with short duration missions in the MIFR.

**2. Preliminary Views**

Viet Nam supports a new WRC Resolution, together with an associated regulatory regime for non-GSO satellite systems with short duration missions.

# Agenda Item 9.1, Issue 9.1.2

*“Resolution 764 (WRC-15) – Compatibility of International Mobile Telecommunications and broadcasting-satellite service (sound) in the frequency band 1 452 – 1 492 MHz* *in Region 1 and 3”*

**1. Background**

The frequency band 1 452-1 492 MHz is allocated to the fixed service (FS), mobile service (MS), broadcasting service (BS) and broadcasting-satellite service (BSS). Based on the outcome of WRC-15, this frequency band 1 452-1 492 MHz is identified for use by administrations wishing to implement IMT in accordance with Resolution 223 (Rev.WRC-15) and Resolution 761 (WRC-15). Pursuant to Resolution 528 (Rev.WRC-03), broadcasting-satellite systems, in the interim period, may only be introduced within the upper 25 MHz of this frequency band.

Pursuant to Resolution 761 (WRC-15), the regulatory and technical studies between International Mobile Telecommunications (IMT) and the broadcasting-satellite service (sound) (BSS (sound)) in the frequency band 1 452-1 492 MHz in Regions 1 and 3 were conducted by ITU-R, taking into account IMT and BSS (sound) operational requirements.

Based on the results of ITU-R studies as detailed in the draft CPM text, 08 possible actions are proposed in order to facilitate the long-term stability of IMT and BSS (sound) in the frequency band 1 452-1 492 MHz in Regions 1 and 3.

| Possible action | Protection of IMT stations | Protection of BSS (sound) receivers |
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| 1 | Maintain status quo (i.e. no changes to the Radio Regulations). | Maintain status quo (i.e. no changes to the Radio Regulations). |
| 2 | Maintain status quo (i.e. no changes to the Radio Regulations) for those countries for which the frequency band is not identified for IMT. | Maintain status quo (i.e. no changes to the Radio Regulations) for those countries for which the frequency band is not identified for IMT. |
| 3 | Stipulate pfd limit(s) for BSS (sound) space stations. Three alternatives are available in this action.  Alternative 1: The pfd limit is stipulated in RR Table **21-4** under RR No. **21.16** taking into account protection of IMT mobile stations.  Alternative 2: The pfd limit is stipulated in RR Table **21-4** under RR No. **21.16** taking into account protection of IMT base and mobile stations.  Alternative 3: The pfd limit is stipulated in a new footnote taking into account the operational requirement of BSS (sound) system. | Maintain status quo (i.e. no changes to the Radio Regulations). |
| 4 | Maintain status quo (i.e. no changes to the Radio Regulations). | Stipulate pfd limit for IMT stations by modification of RR Nos. **5.346** and **5.346A**. |
| 5 | Stipulate a new coordination threshold for RR No. **9.11** based on pfd value.  The pfd value is stipulated in a new footnote taking into account the e.i.r.p. value of 70.8 dBW for a space station of BSS (sound). | Maintain status quo (i.e. no changes to the Radio Regulations). |
| 6 | Maintain status quo (i.e. no changes to the Radio Regulations). | Stipulate a new coordination threshold for RR No. 9.19 based on pfd value to reach coexistence for protection of BSS (sound) receivers. |
| 7 | Stipulate pfd limit(s) for BSS (sound) space stations. Three alternatives are available in this action. | Stipulate pfd limit for IMT stations by modification of RR Nos. 5.346 and 5.346A. |
| 8 | Stipulate a new coordination threshold for RR No. **9.11** based on pfd value.  The pfd value is stipulated in a new footnote taking into account the e.i.r.p. value of 70.8 dBW for a space station of BSS (sound). | Stipulate a new coordination threshold for RR No. 9.19 based on pfd value to reach coexistence for protection of BSS (sound) receivers. |

Possible action 4 proposes to maintain the status quo (i.e. no changes to the Radio Regulations) for the protection of IMT stations and to stipulate pfd limitation to IMT for the protection of the BSS (sound) receivers by modification of RR Nos. 5.346 and 5.346A: the power flux-density (pfd) produced by any IMT transmitting station at 3 m above the ground of any point of the territory of any other administration which is within the service area of a satellite network in the broadcasting-satellite service in this frequency band does not exceed −159.4 dB(W/(m2⋅ 4 kHz)).

**2. Preliminary View**

Viet Nam is of the view that:

* Support Possible action 4: Stipulate pfd limit for IMT stations by modification of RR Nos. **5.346** and **5.346A**

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1. See § 2.6 of RR Appendix **30B**. [↑](#footnote-ref-1)