

**Director, Radiocommunication Bureau**

**SUBMISSION BY THE ADMINISTRATION OF NORWAY CONCERNING  
THE APPLICATION OF ARTICLE 48 OF THE ITU CONSTITUTION  
TO THE RECORDED FREQUENCY ASSIGNMENTS TO  
THE INSAT-2(48), INSAT-2M(48), INSAT-2T (48), AND  
INSAT-EK48R SATELLITE NETWORKS AT 48°E**

This delayed submission, contains in Annex 1, a communication from the Administration of Norway indicating its support for the Administration of Germany, which expressed its concern regarding the application of Article 48 of the ITU Constitution to the recorded frequency assignments to the INSAT-2(48), INSAT-2M(48), INSAT-2T (48), and INSAT-EK48R satellite networks at 48°E which complements the information contained in [Document RRB18-1/7](#).

Annex.

## Annex 1

From:NKOM

To:0041227305785

06/03/2018 12:42

#735 P.001/002



Norwegian  
Communications  
Authority

International Telecommunication Union - ITU  
Place des Nations  
1211 GENEVA 20  
Sveits

Our ref.:1503773-71 - 551  
Our date: 6.3.2018

Your ref.: Document RRB18-1/7E  
Your date: 26.2.2018

Contact: Hæge Andersen

### Norwegian support to German submission – IND application of Article 48 of the ITU constitution

Dear Sirs,

The Administration of Norway writes to express its support for the German Administration's submission, Document RRB18-1/7E of 26th February 2018, concerning the INSAT-2(48), INSAT-2M(48), INSAT-2T(48), and INSAT-EK48R satellite networks at 48E. In Annex 3 and 4 to their submission, the German Administration noted its concern that the Indian Administration had invoked Article 48 to end an enquiry into satellite filings for its orbital locations that were vacant from May 2011 to January 2017. The German Administration maintains that, "as a matter of principle, the invocation of Article 48 to shield these filings from being examined under No. 13.6 cannot be supported or justified."

Although not an issue that has ever been directly before the RRB, the Administration of Norway understands that, the RRB has recently been contemplating the management of potential abuses stemming from Article 48 of the ITU Constitution. As Mr. Strelets remarked at the 71st meeting of the RRB, "the essential problem [is] how to avoid abuse in the application of the conference's decisions, i.e. how to ensure that administrations [do] not notify as military

Norwegian  
Communications Authority  
Office address:  
Nygård 1, Lillesand

Postal address:  
P.O. Box 93  
N-4791 LILLESAND  
NORWAY

Tel +47 22 82 46 00  
Fax +47 22 82 46 40  
firmapost@nkom.no

NO 974 446 871  
www.nkom.no

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To: 0041227305785

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installations stations that were in fact used for commercial purposes." The letter submitted by the German Administration raises an issue ripe for review by the RRB.

The Administration of Norway is facing a similar issue with one of its own networks, and consider submitting our issue for the next RRB meeting. The Administration of Norway supports the German Administration's request for careful attention and consideration as to how Article 48 is applied. The Administration of Norway recommends that the RRB restricts the application of Article 48 to military bands, and allows inquiries into the legitimacy of invocations of Article 48 to proceed.

With regards

John-Eivind Velure  
Director, Frequency Management Department

Hæge Andersen  
Senior Engineer

*Electronically approved. No signature required.*