
Document RRB18-2/DELAYED/1-E
2 July 2018
Original: English

Director, Radiocommunication Bureau

**SUBMISSION BY THE ADMINISTRATION OF CYPRUS REQUESTING A
DECISION BY THE RADIO REGULATIONS BOARD FOR THE BRINGING INTO
USE OF THE FREQUENCY ASSIGNMENTS TO THE KYPROS-SAT-3 (39°E)
SATELLITE NETWORK**

The attached submission from the Administration of Cyprus¹ requesting a decision for the bringing into use of the frequency assignments to the KYPROS-SAT-3 (39°E) satellite network, which complements the information contained in Document [RRB18-2/2\(Addendum 2\)](#), is for the consideration of the Radio Regulations Board.

Attachment.

¹ This submission refers to annexes related to the HS-4 satellite together with its planned launch schedule, and in conformity with § 1.6 *bis* of the RRB internal arrangements and working methods (Part C of the Rules of Procedure), these annexes are not published.

Attachment



REPUBLIC OF CYPRUS
MINISTRY OF TRANSPORT,
COMMUNICATIONS AND WORKS



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Mr. F. Rancy
Director
Radiocommunication Bureau
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CH-1211 Geneva 20
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Reference:
(a) Addendum 2 to Document RRB18-2/2-E dated 26 June 2018

Dear Mr. Rancy,

**Request for a Decision by the Radio Regulations Board for the Bringing
Into Use of the KYPROS-SAT-3 (39° E) Satellite Network**

The administration of the Republic of Cyprus notes and appreciates the Director's contribution to the forthcoming 78th meeting of the Radio Regulations Board, reference (a) above, regarding the bringing into use status of our KYPROS-SAT-3 (39° E) Satellite Network, and some particular difficulties faced by my Administration in this regard.

2. My Administration would like to bring to the attention of the BR and the esteemed RRB members the following additional information regarding the regulatory and operational situation of its KYPROS-SAT-3 satellite network:

- a) My Administration confirms and concurs with the explanation of the events regarding the bringing into use, Part-B recording and notification of the KYPROS-SAT-3 satellite network as explained by the Director in his report, reference (a) above.
- b) With regard to §4 of the Director's report, my Administration confirms the confusion regarding the status of the UKR00001 allotment, and notes that at the time of the filing of the Part-A submission of our KYPROS-SAT-3 satellite network, this Ukrainian network was identified as a "Pending" "List" system and not as a national allotment, the procedures of Article 7 of Appendix 30B having not at that time been completed. My Administration regrets this confusion on the part of our satellite operator, which led to an inadvertent

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triggering of the UKR00001 national allotment, as affected, by our 3 June 2016 Part-B and notification submissions.

- c) Unfortunately, by the time that this issue was drawn to my Administration's attention by the BR, on 18 April 2017, the BADR-7 physical spacecraft, which had brought into use and been operating at 39° E under the KYPROS-SAT-3 satellite network filing, had had to be redeployed to another orbital position, for operational reasons. Nonetheless, my Administration did resubmit the Part-B and notification filings to the BR on 22 September 2017, taking proper account of the UKR00001 national allotment (which was no longer identified as affected).
- d) Because of the operational redeployment of the BADR-7 spacecraft, my Administration had already, on 5 December 2016, requested the suspension of the KYPROS-SAT-3 satellite network filing. However, this suspension request was not acted on by the BR, on the basis that the network was not at that point treated by the BR as having been brought into use for regulatory purposes (although physically operational at 39° E for more than 90 days), since Article 8 of Appendix 30B had not been successfully applied.
- e) My Administration would like to inform the RRB members that the manufacturing and launch contracts for the satellite intended to replace BADR-7 at 39° E, the HS-4 spacecraft, were signed on 9 April 2015 and 7 April 2015 respectively, and the satellite will be launched within the next 6 months.
- f) Further supporting information about the HS-4 satellite (also known as "HS4/SGS-1" or as "ARABSAT-6G") currently under construction, and its planned launch in the 4th quarter of 2018, are attached to this letter for the information of RRB members. Annex 1 is the construction schedule provided by the satellite manufacturer, and Annex 2 is a confirmation of the launch slot provided by the launch services company. Please note that these Annexes contain information of a confidential or proprietary nature, and you are kindly requested not to circulate them beyond the RRB members¹.
- g) My Administration, and our operator, would like to confirm that there has been, and continues to be, a firm and long-term plan for the launch and operation of a satellite operating under the KYPROS-SAT-3 filing. At significant expense, our operator initially operated the BADR-7 satellite at 39° E and at the same time contracted for the manufacture and launch of the HS-4 satellite to operate long-term in the slot. It is therefore of critical importance to my Administration that the KYPROS-SAT-3 filing is maintained for support of this satellite.
- h) On the basis of the previously requested 6 June 2016 suspension of KYPROS-SAT-3, my Administration's operator has been working strenuously with their satellite manufacturer and launch provider to ensure that the KYPROS-SAT-3 filing can resume operation by 6 June 2019, i.e. 3 years from the date of the requested suspension, in accordance with RR No. 11.49. As shown in Annex 2, the HS-4 satellite is currently planned to be launched in November 2018

¹ As, for example, was done with Document RRB15-2/8-E.

which, allowing for the orbit-raising time, will ensure that the 6 June 2019 limit for resumption of operations can be met with some margin.

- i) Noting §8 of the Director's report, my Administration agrees that the provision No. 11.44B.2 "was adopted [in WRC-15] following discussions that were assuming that a submitted notification may always be concluded by a recording in the MIFR, notably because of the existence of No. 11.41 or of similar procedures in Appendices 30, 30A and 30B." However, as the Director further notes, the provision 11.44B.2 was adopted without taking into account the specificities of the procedures of Appendix 30B and in particular the fact that § 6.25 of Article 6 of Appendix 30B does not apply to allotments in the Plan (and thus it is not similar to provision 11.41) and create a specific relationship between the entry into the List under §6.17 of Article 6 of Appendix 30B and under §8.1 of Article 8 of that Appendix.
- j) In view of the above, the Cypriot administration kindly requests the distinguished RRB members to take this information, the particular difficulties of my Administration, and our operator's efforts to build a new satellite which will make use of the frequency assignments of KYPROS-SAT-3 satellite network, into account and exceptionally allow the processing by the BR of our 22 September 2017 resubmission of the Part-B and notification information for the KYPROS-SAT-3 network maintaining the original date of receipt of the first submission, i.e. 3 June 2016, thus maintaining the associated 7 March 2016 date of bringing into use, based on the BADR-7 satellite, and the requested suspension as of 6 June 2016.
- k) If this is not possible, we request RRB members to agree to maintain the 7 March 2016 date of bringing into use, based on the BADR-7 satellite, and the requested suspension as of 6 June 2016, and to associate this bringing into use with the 22 September 2017 resubmission of the Part-B and notification for KYPROS-SAT-3.

3. My Administration is ready to provide any further information that might be requested by the RRB members, and trusts that the RRB will be able to agree to the request made by the Republic of Cyprus, so as to ensure the long-term operation of the HS-4 satellite at 39° E under the KYPROS-SAT-3 filing.

4. The Director is kindly requested to transmit this communication to the RRB for consideration at their 78th meeting.

Yours sincerely,



Stavros Tsiakkouris
Electronic Communications Officer
For Director

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