
Document RRB18-3/DELAYED/3-E
19 November 2018
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Director, Radiocommunication Bureau

FURTHER SUBMISSION BY THE ADMINISTRATION OF EGYPT
REQUESTING AN EXTENSION OF THE REGULATORY TIME-LIMIT TO
BRING INTO USE THE FREQUENCY ASSIGNMENTS TO EGYCOMM0A
SATELLITE NETWORK AT 35.5°E

This additional delayed submission from the Administration of Egypt, which complements the information contained in Documents [RRB18-3/7](#) and [RRB18-3/8](#), is for the consideration of the Radio Regulations Board.

Annex

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18 NOVEMBER 2018

Our Reference:
NTRA/ITU/RRB/2/2018

To: Director of Radio Communication Bureau
International Telecommunication Union
Geneva, Switzerland
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From: National Telecom Regulatory Authority (NTRA)
B4 Smart Village, K28 Giza,
Arab Republic of Egypt
Fax: +2 02 3534 4155

Pages: (4) pages.

Subject: Extension of Regulatory Deadline for EGYCOMM0A Satellite Network.

References:

1. EGYCOMM0A Published in Part-Is of BRIFIC 2822 dated 21/6/2016
2. EGYCOMM0A published in special section Nos. CR/C/2534, CR/C/2534 MOD-1, CR/C/2534 MOD-2, of BRIFIC 2667, BRIFIC 2821 and BRIFIC 2846.
3. Document RRB18-3/7-E dated 1/11/2018.
4. Document RRB18-3/8-E dated 5/11/2018.

Dear sirs

In Reference to Egyptian administration input to RRB18.3/7-E, NTRA had noted comments submitted regarding the Egyptian administration request for an extension of the regulatory time-limit to bring into use the frequency assignments to the EGYCOMM0A satellite network at 35°E, due to co-passenger issue.

In this context, NTRA would like to confirm that there is no any basis for these comments, or warehousing claims underpin these comments.

In this regard, NTRA would like to kindly draw the attention of the RRB to the following:

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- Egyptian administration scheduled the launch of EGYCOMM0A satellite network located 35.5E initially during period from 1/2/2019 to 30/4/2019 which in the scheduled deadline on Ariane V in upper position based on the extension granted by RRB in its meeting No.79
- unfortunately, the launcher (Arianespace) of the EGYCOMM0A Satellite network indicated that the launch of Egyptian satellite network will be rescheduled to be during the period 1/7/2019 to 31/12/2019 due to unavailability of the potential co-passengers for lower position.
- As a result, launch delay was totally beyond the control of the Egyptian administration.

With respect to claims for Egyptian administration to spectrum warehousing, NTRA would like to clarify the following facts:

- In 2009 Egyptian government decided to manufacture and launch number of satellites to provide essential Aeronautical and broadband services to fill current Gap and critical needs for African member states.
- Technical studies results revealed that at least two satellite in apart orbital location is necessary to meet these objectives.
- NTRA submitted satellite network filings in different six orbital locations and directly initiated technical coordination process for the subject filings.
- Unfortunately, in 2011 Egypt indulged a force majeure incident that was beyond its control, which directly negatively affected satellite procurement process due reducing credit ratings. However, NTRA continued to effect coordination procedures for the networks filings.
- As results of reforms taken by the Egyptian government in 2014, Egypt economic outlook was promising enough for international institutions to raise back credit rating. Which allow the Egyptian administration to fund the procurement process for the first Egyptian Telecommunication satellite.
- Egyptian administration faced difficulties to meet original dates scheduled for satellite procurement process and consequently to meet dates of bring into use by the end of seven years limits which ended in May 2015.
- The Egyptian government assessed the situation and studies revealed that the only solution is to utilize one of the in orbit satellite to BIU the Egyptian filing at the two different orbital location. However, NTRA had a faith in the cooperation among ITU member states, to understand the matter, as a result



- NTRA submit for RRB to extend regulatory deadline limit for three orbital locations (two as main and one as backup) for additional three years.
- In this regard and once the Egyptian government had found difficulty in providing funding for the required number of satellites, NTRA submitted in delayed contribution RRB16-1/DELAYED/2-E requesting the RRB to consider the reduction of the requirement to one orbital location, based on success of technical coordination with potential affected member states, such requirements also were lessening down to be limited to single band rather than other frequency bands contained in the Egyptian filing.
 - Such action was based on avoidance of any misuse or warehousing Radio Spectrum resources and orbital positions.

It is worth to mention, that based on the decision take on 79th meeting of RRB granting three-year extension of for the Egyptian satellite network filing at 35.5° East. Egyptian administration, headed directly to sign contracts with the manufacturers Thales Alenia Space and Airbus Defence in 10/5/2016 and with the Launcher Arianespace in 20/5/2016 to launch Egyptian satellite network located 35.5E within regulatory deadline, which considered an achievement to finalize these contracts in less than 3 months. to ensure that the Egyptian Government meet the confidence that granted by the Radio Regulations Board.

In the view of the above, it may be crystal clear that warehousing or misuse of spectrum is very far from the Egyptian government intention.

- Thereby, NTRA would like to confirm that the manufacturing of the Egyptian satellite network to be launched in 35.5E will be finalized in February **2019 i.e. before the regulatory deadline** and **the only reason for request of extension is co-passenger issue**, and as a hosted payload the Egyptian operator is not in a position to compel or influence the launcher (Arianespace) in their selection of the co-passenger for preceding launch and there is no connection between the delay and any action taken by the operator or the Egyptian administration As such, the present request is significantly different in nature of the first Egyptian request, which was based on force majeure, not on co-passenger delay.

NTRA would like to address further that the subject filing is the first telecommunication satellite to be launched into geostationary orbit to provide essential telecommunication services, leveraging telecommunication infrastructure across developing countries in Africa and Middle East that will assist developing




countries to be able to access radio spectrum and orbital resources as a common heritage resource, in order to provide essential telecom services for rural areas across Egypt, Africa and Middle East.

Finally, Egyptian government is totally in confident with respect to decisions that the RRB may consider that as long as any extension is limited and qualified, the decision by WRC-12, confirmed by WRC-15, on the ability of the Board to provide extensions based on either a co-passenger issue or on force majeure **does not contain any reference or any text limiting the number of extensions that could be given to a satellite network.**

In addition, Egyptian administration would like to kindly invite RRB to consider its decision in its meeting as postponing decision will severely impact the Egyptian administration satellite program, despite the request highlighted to postpone the RRB decision, has no any basis neither in Radio Regulation nor in other precedent of actions considered by RRB for similar cases.

Sincerely,

Eng. Mostafa Abdel Wahed


Acting Executive President
National Telecom. Regulatory Authority.