
Document RRB18-3/DELAYED/4-E
21 November 2018
Original: English

Director, Radiocommunication Bureau

**SUBMISSION BY THE ADMINISTRATION OF THE UNITED ARAB
EMIRATES REGARDING THE BRINGING INTO USE OF THE YAHSAT-G6-
17.5W SATELLITE NETWORK AND THE APPLICATION OF ARTICLE 48 OF
THE ITU CONSTITUTION**

The attached submission from the Administration of the United Arab Emirates, which complements the information contained in Document [RRB18-3/12](#), is for the consideration of the Radio Regulations Board.

Annex.

Annex



Date: 13 November 2018
Ref.: TRA/SA/18/S-1/Y/1673

Mr. Francois Rancy
Director, Radiocommunication Bureau

Subject: Bringing Into Use of YAHSAT-G6-17.5W satellite network

Reference:

- A. RRB submission 18-3/12-E from Norway dated 6 Nov 2018
- B. UAE letter dated TRA/SA/18/S-1/Y/18/1331 dated 10 June 2018 (attached)
- C. Norway letter no. 1503773-76-551 dated 3rd May 2018 (attached)

Dear Sir/Madam,

The Administration of the United Arab Emirates (UAE) takes note of the submission from the Administration of Norway to the RRB (Ref A) concerning the YAHSAT-G6-17.5W satellite network. As Ref A was made public by the BR on the day after the deadline for the submission of comments for the upcoming 79th meeting of the RRB, the UAE Administration provides response after the deadline, with the expectation that the matter will be addressed at the 80th RRB meeting in March 2019.

To assist the RRB in its deliberations, the UAE wishes to provide the following information:

- (a) Our national satellite operator, Al Yah Satellite Company ("Yahsat") has been licensed the use of the UAE filing called YAHSAT-G6-17.5W ("the UAE Filing") at 17.5W and as well the YAHSAT-N-20W filing at 20W (together "the UAE Filings"). Our understanding, based on correspondence received, is that "Global IP" is the satellite operator licensed to use the Norwegian filing at 18W called "DUB DUB-5-18W" ("the Norwegian Filing").
- (b) No coordination agreement is currently in place between the Norwegian Filing and the UAE Filings.
- (c) Yahsat and Global IP met on 5 December 2017 to discuss possible solutions for the compatible operations of these filings. While some possible ways forward were considered, none have been agreed upon at this time.
- (d) Based on the text in Ref A, the UAE Administration once again acknowledges that Norway has found no information in the public domain concern the UAE Network. As this is a governmental network, no information has been placed in the public domain and consequentially none should be available upon a search of public sources. At this point, the UAE Administration also reconfirms the relevant information that it has already provided to the Radiocommunication Bureau under Resolution 49, but regretfully can provide no further information.



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- (e) On March 3rd 2018, the Administration of Norway sent a letter to the UAE and the BR putting forward that the strategy for the eventual operation under its Norwegian Filing is prefaced on the suppression of the UAE Filing.¹ This strategy, which is the basis for this submission, was established without any communication with either Yahsat or this Administration as to the future plans of its networks.
- (f) In Ref C, the Administration of Norway also put forward that "Yahsat is claiming its absolute rights to this orbital position". No such affirmation has been made by Yahsat or this Administration. In its response, this Administration re-stated its support to the ITU process as defined in the Radio Regulations, in its belief that it has discharged its obligations regarding the UAE Filings and that both operators should continue coordination activities under Article 9.7 of these rules.
- (g) Since our response in Ref B, which was sent to both the BR and Norway, neither the UAE Administration or Yahsat has record of any communication from the Administration of Norway aimed at forwarding coordination discussions regarding the networks under consideration.

In light of the above, this Administration is of the view that the petition put forward is without basis and should be dismissed. Furthermore, this Administration reiterates its view that the appropriate path forward is through the encouragement by both respective Administrations of a constructive dialog between its satellite operators, with the end goal of a successful coordination agreement.

Best Regards,

For/
Tariq Al-Awadhi
Executive Director Spectrum Affairs

Copy to: Director of Radiocommunication Bureau, ITU, GENEVA, SWITZERLAND (Fax No.: +41 22 730 5785)

¹ See ref B, ±This orbital position was selected when it became clear that coordination with neighboring satellites would be feasible, and based on the operator's assessment that the YAHSAT-G6-17.5W network would expire before being brought into use.

[Ref A]
Document [RRB18-3/12](#)

[Ref. B]



Date: 10 June 2018
Ref.: TRA/SA/18/S-1/Y/18/1331

NORWEGIAN COMMUNICATIONS AUTHORITY
P.O. BOX 93
4791 LILLESAND
NORWAY
Email: firmapost@nkom.no;

FAX: +47 22 824640

Subject: Bringing Into Use of YAHSAT-G6-17.5W satellite network

- Reference:
- 1) Your letter no. 1503773-76-551 dated 3rd May 2018
 - 2) YAHSAT-G6-17.5W PART I-S BR IFIC 2855 dated 3.10.2017
 - 3) YAHSAT-G6-17.5W RES49 2073 BR IFIC 2860 dated 12.12.2017
 - 4) ITU SNL database - suspended network list

Dear Sir/Madam,

The Administration of the United Arab Emirates (UAE) acknowledges receipt of your letter referenced above. We can confirm that YAHSAT-G6-17.5W satellite network has been brought into use in accordance with the appropriate provisions of the ITU Radio Regulations.

The UAE Administration would also like to highlight that the Notified frequency assignments are solely for national defence services under Article 48 of the ITU Constitution. This payload is not used to provide commercial services and therefore related information is not provided for distribution in the public domain. Moreover, this Administration has already provided the ITU BR with the necessary information related to the BIU of the frequency assignments, which are currently published in the ITU databases (see Ref B and C).

As to the compatibility between your future network at 18° W with our network at 17.5° W, the UAE Administration was informed by its relevant satellite operator that preliminary discussions have taken place between both operators and stand to continue with the aim of a successful resolution of this coordination.

This Administration would also like to take the opportunity to point out that coordination has also not been completed between the planned Norwegian network at 18° W and our suspended network at 20° W. This network has been returned into use on 30th April 2018 following the arrival at this location of the Al Yah 3 satellite (see Ref D above).

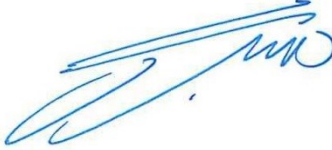


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The UAE remains supportive of the ongoing coordination discussion between both operators' satellite networks at 17.5° W, 18.0° W and 20° W.

Best Regards,



Tariq Al-Awadhi
Executive Director Spectrum Affairs

Copy to: Director of Radiocommunication Bureau, ITU, GENEVA, SWITZERLAND (Fax No.: +41 22 730 5785)

[Ref. C]

From: NKOM

To: 0097126118229

03/05/2018 12:07

#829 P.001/002



Norwegian
Communications
Authority

Telecommunications Regulatory Authority
P. O. Box 26662
ABU DHABI

De forente arabiske emirater

Our ref.: 1503773-76 - 551
Our date: 3.5.2018.

Your ref.:
Your date:

Contact: Hæge Andersen

Bringing into use of the YAHSAT-G6-17.5W Network

Dear Sir/ Madam,

The Administration of Norway would like to bring to the attention of the Administration of the United Arab Emirates, the serious concern we have in regard of bringing into use of the YAHSAT-G6-17.5W satellite network.

The satellite operator Global IP is for the time being building a high capacity Ka broadband satellite that will be located at the 18W orbital position, operating under the DUB DUB-5-18W satellite network filing. This orbital position was selected when it became clear that coordination with neighboring satellites would be feasible, and based on the operator's assessment that the YAHSAT-G6-17.5W network would expire before being brought into use. This assumption concerning the expiration of the YAHSAT-G6-17.5W network was documented to be correct insofar as no public information sources was indicating that a satellite was placed at this orbital position prior to the YAHSAT-G6-17.5W network's expiration date of 8 November 2017. However, it appears that your administration has submitted RES49 filings to ITU indicating that this network was indeed brought into use prior to the regulatory deadline in order to preserve its ITU rights.

Global IP has approached your operator, Yahsat, to attempt to reach a mutually agreeable understanding that might allow both satellite networks to operate despite the very small (0.5 degree) orbital separation. Unfortunately, Yahsat is claiming its absolute rights to this orbital

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03/05/2018 12:08

#829 P.002/002



position based upon the fact that this satellite is a military installation, subject to Article 48 of the ITU Constitution, accordingly said that the current bringing into use could not be challenged within the ITU.

The Administration of Norway has informed the ITU-BR of its concern related to this matter. We also submitted a contribution to support a similar case on the March 2018 meeting of the Radio Regulations Board. The Administration of Norway respects the rights of other administrations to apply the provisions of Article 48 of the ITU Constitution in respect of valid military radio installations. However, after making a detailed search of all launch manifests and other public data, we could not find any evidence of a satellite that could have been operating under the YAHSAT-G6-17.5W network filing in Ka-band on the 17.5W orbital position prior to the 8 November 2017 expiration date. In addition, we note that your operations at 17.5W have not been suspended at ITU. We therefore kindly ask you to provide us with the necessary information to support the fact that your network at 17.5W has been brought into use according to the ITU procedures.

Anyhow, we do hope that this matter can be resolved bilaterally between our two administrations, thus avoiding any need for us to take any further action at the ITU. To this end we look forward to receiving your response in the soonest possible timescale given the urgency of this matter.

With Regards

John Eivind Velure
Director

Bent Andre Støyva
Head of Section

Electronically approved. No signature required.

Copy to: International Telecommunication Union - ITU, Place des Nations, 1211 GENEVA 20,
Sveits