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| A close up of a sign  Description automatically generated | **World Radiocommunication Conference (WRC-23) Dubai, 20 November - 15 December 2023** | |  |
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| PLENARY MEETING | | **Addendum 2 to Document 111(Add.25)-E** | |
|  | | **30 October 2023** | |
|  | | **Original: Chinese** | |
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| China (People's Republic of) | | | |
| |  | | --- | | Proposals for the work of the Conference | | | | |
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| Agenda item 9.2 | | | |

9 to consider and approve the Report of the Director of the Radiocommunication Bureau, in accordance with Article 7 of the ITU Convention;

9.2 on any difficulties or inconsistencies encountered in the application of the Radio Regulations;[[1]](#footnote-1)1 and

Experience in the application of the radio regulatory procedures

Section 3.1 – Articles of the Radio Regulations

Introduction

Noting that the difficulties and inconsistencies encountered in the application of the relevant provisions are collected and analysed in Part 2 of the Report of the Director of Radiocommunication Bureau ([Doc.4 (Add.2](https://www.itu.int/md/R23-WRC23-C-0004/en))), views and proposals of this Administration with respect to a number of items are summarized in this document focusing on experience in the application of the radio regulatory procedures under section 3.1 – Articles of the Radio Regulations.

Proposals

This Administration submits its views and proposals with respect to a number of items for further discussion during the Conference.

CHN/111A25A2/1

#### 3.1.1.2 TT&C frequencies and other associated spectrum requirements for non-GSO satellite systems providing In-Orbit Servicing

The Conference is invited to note the proposed regulatory approach for the above-described IOSscenario.

**Views and proposals：**This Administration noted and supports the Bureau’s proposed regulatory approach.

**Reasons:** It is beneficial to sharing and compatibility with respect to existing satellite networks.

CHN/111A25A2/2

#### 3.1.2.1 Application of No. 4.4 in the Appendix 30B frequency bands

The Conference is invited to confirm the Bureau’s application of § 4.2of Appendix **30B** with respect to the use of No. **4.4** in the Appendix **30B** frequency bands, i.e. the Bureau does not accept the application of No. **4.4** in these frequency bands except for the four cases listed above.

**Views and proposals：**Regarding the frequency bands 10.7-10.95 GHz and 11.2-11.45 GHz in a non-GSO FSS in the last bullet, with respect to § 4.2of Appendix **30B**, this Administration has difficulty in agreeing to recording an assignment under No. **4.4** which does not meet RR Article **21** pfd limits.

**Reasons:** This Administration understands that the Bureau shall examine the submissions and publish the findings of a coordination request for a non-GSO satellite system. However, for the recording of an assignment which exceeds Article **21** pfd limits in the frequency bands 10.7-10.95 GHz and 11.2-11.45 GHz as indicated in the fourth bullet, the application of No. **4.4** would lead to the transmission of carriers of non-GSO FSS space stations in excess of pfd limits on a global basis. As a result, this would not only cause harmful interference to terrestrial services, but also to frequency assignments in the List under Appendix **30B**. However, pursuant to No. **5.441**, the complaint against unacceptable interference may be raised by the affected administrations. This will represent a significant burden for the administrations concerned. Besides, we don't think that the assignments recorded under No.**4.4** are suitable for the expected operation of a non-GSO satellite system.

CHN/111A25A2/3

#### 3.1.3.2 Case of application of No. 9.21 leaving potentially affected administrations with no means to submit comments (Nos. 5.228AC and 5.474A)

The Conference is invited to consider modifying No. **9.52.1**, as follows, to allow commenting procedures for administrations whose satellite networks or systems may affect or be affected by an incoming frequency assignment to a space station that is only subject to Section II of Article **9** with respect to terrestrial services or to a number of predetermined countries.

**9.52.1** An administration believing that unacceptable interference may be caused to its existing or planned satellite networks or systems not subject to the coordination procedure under Section II of Article **9** or subject to this Section only with respect to terrestrial services or to a number of predetermined countries may send its comments to the requesting administration. A copy of these comments may also be sent to the Bureau. Such comments shall however not by themselves constitute a disagreement under No. **9.52**. Thereafter, both administrations shall endeavour to cooperate in joint efforts to resolve any difficulties, with the assistance of the Bureau, if so requested by either of the parties, and shall exchange any additional relevant information that may be available.   (WRC‑23)  .

**Views and proposals：**This Administration agrees to the Bureau’s modification proposal.

**Reasons:** The modification identifies a commenting procedure for administrations whose satellite networks or systems may affect or be affected by an incoming frequency assignment to a space station that is only subject to Section **II** of Article **9** with respect to terrestrial services or to a number of predetermined countries.

CHN/111A25A2/4

#### 3.1.4.4 Proposal for the removal of advance publication information for satellite networks subject to coordination under section II of Article 9

Since the notice is submitted under No. 9.30, the Conference is invited to consider the removal of the advance publication information for satellite networks subject to coordination under Section II of Article 9. Consequential changes to the Radio Regulations are shown below.

**Views and proposals：**Noting that the Bureau may still need to thoroughly review to ensure the modification is consistent and complete, this Administration agrees to the Bureau’s modification proposal.

**Reasons:** The date of receipt is decided by the submission under No.**9.30**.

CHN/111A25A2/5

#### 3.1.5.2 Registration of mobile stations of terrestrial services in the MIFR

In order to address that concern and make the provisions of RR Nos. **8.1** and **11.14** fully consistent, WRC-23 may allow the notification of the following frequency assignments to the MIFR:

*a)* *the aircraft-to-aircraft, ship-to-ship and aircraft-to-ship radiocommunication links;*

*b)* *standalone aircraft and ship applications.*

In this context, RR No. **11.14** might need to be changed to enable the notification of such stations, for example:

*11.14* *Frequency assignments to mobile stations, except ship, aircraft, radiolocation and radionavigation mobile stations, to stations in the amateur service, to earth stations in the amateur-satellite service, and those to broadcasting stations in the high-frequency bands allocated to the broadcasting service between 5 900 kHz and 26 100 kHz which are subject to Article 12 shall not be notified under this Article.* (WRC‑23)

**Views and proposals:** Noting the complexity of frequency sharing and compatibility, as well as its relevance to other WRC-23 agenda items, further discussions are needed for the issue. At this stage, this Administration has difficulty in agreeing to this modification proposal.

**Reasons:** The issue is related to the complicated frequency sharing and compatibility situation . It is also relevant to some agenda items.

CHN/111A25A2/6

#### 3.1.5.4 Changes on the period for bringing into use made under No. 11.43A

The Conference is invited to consider if the five-year period for bringing into use the frequency assignments according to No. **11.43A** should be changed to seven years, to be consistent with the period provided under No. **11.44**。

**Views and proposals:** China has difficulty to agreeing to the revision to No.**11.43A**.

**Reasons:** 1) No. **11.43A** targets the modification of a satellite network instead of an initial submission.

2) It is relevant to No. **11.41.2** when both coordination request and notification information are submitted at the same time.

3) No. **11.43A** has been applied for a long time, and administrations have encountered no difficulty in its application.

CHN/111A25A2/7

#### 3.1.5.6 Implementation of No. 11.48, Resolution 552 (Rev.WRC-19) and Resolution 49 (Rev.WRC-19)

The Conference is invited to consider the modification of the regulatory text above to align No. **11.48** and § 4 of Annex 1 to Resolution **49** as described above.

**Views and proposals:** This Administration has encountered no difficulty in applying Nos. **11.48** and **11.48.1**. If the Conference considers deciding to modify these provisions, this Administration would like to provide an alternative, as an example, for consideration by the conference.

**Reasons:** There is no difficulty for this Administration to apply the existing provisions Nos. **11.48** and **11.48.1**. It is noted that BR is considering and has proposed the suppression No. **9.1A**. Therefore, further consideration is required to achieve the necessary consistency.

**Alternative:**

11.48 If, after the expiry of the period of seven years from the date of receipt of the relevant complete information referred to in No. **9.1** or **9.2** in the case of satellite networks or systems not subject to Section II of Article **9** or in No. **9.1A**in the case of satellite networks or systems subject to Section II of Article **9**, the administration responsible for the satellite network has not brought the frequency assignments to stations of the network into use, or has not submitted the first notice for recording of the frequency assignments under No. **11.15**, or, where required, has not provided the due diligence information no later than 30 days following the end of the period established as a limit to bringing into use in No. **11.44**,pursuant to Resolution **49 (Rev.WRC‑19)**, as appropriate, the corresponding information published under Nos. **9.1A**, **9.2B** and **9.38**, as appropriate, shall be cancelled, but only after the administration concerned has been informed at least six months before the expiry date referred to in Nos. **11.44** and **11.44.1** and, where required, § 10 of Annex 1 of Resolution **49** **(Rev.WRC‑19)**[[2]](#footnote-2)31.     (WRC‑23)

CHN/111A25A2/8

#### 3.1.9.3 Applicability of Article 21 pfd limits in the 37.5-40 GHz and 40.5-42.5 GHz frequency bands to non-geostationary satellite systems operating with 100 or more satellites

When examining compliance with pfd limits under No. **11.31** for the 37.5-40 GHz and 40.5-42.5 GHz frequency bands applicable to non-GSO FSS, MSS and BSS satellite systems, the Bureau will continue to apply, as explained above, the Article **21** limits to all satellite systems and assume that the pfd limits for non-GSO satellite systems operating with 100 or more satellites should not be less stringent than those with 99 or fewer satellites, unless advised otherwise by the Conference.

**Views and proposals：**This Administration agrees to the Bureau’s understanding and the applications of RR provisions.

**Reasons:** The protection requirement for the affected stations is not changed.

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1. 1 This agenda sub-item is strictly limited to the Report of the Director on any difficulties or inconsistencies encountered in the application of the Radio Regulations and the comments from administrations. Administrations are invited to inform the Director of the Radiocommunication Bureau of any difficulties or inconsistencies encountered in the Radio Regulations. [↑](#footnote-ref-1)
2. 31 **11.48.1** If the information pursuant to Resolution **552 (Rev.WRC‑19)** has not been provided, the corresponding information published under No. **9.38** shall be cancelled, after informing the notifying administration based on Annex 1 to this Resolution, 30 days after the end of the seven-year period following the date of receipt by the Bureau of the relevant complete information under No. **9.1A**.     (WRC‑23) [↑](#footnote-ref-2)