



Document
RRB24-2/DELAYED/2-E
5 June 2024
Original English

Director, Radiocommunication Bureau

**SUBMISSION BY THE ADMINISTRATION OF NORWAY REGARDING THE
PROVISION OF STARLINK SATELLITE SERVICES IN THE TERRITORY OF
THE ISLAMIC REPUBLIC OF IRAN**

The attached delayed submission from the Administration of Norway regarding the provision of STARLINK satellite services in the territory of the Islamic Republic of Iran, is for the consideration of the Radio Regulations Board.

Attachment

Attachment



International Telecommunication Union - ITU
Radio Regulations Board
CH-1211 Geneva 20
Sveits

Our ref.: 2210797-46 - 551
Our date: 4.6.2024

Your ref.: 01RB(DIR)O-2024-000803
Your date: 14.3.2024

Contact: Frode Målen

Submission from the administration of Norway regarding questions from the 95th RRB

References:

- 1) Joint letter from Norway and USA Ref. 2210797-21-551 dated 11 October 2023
- 2) Your letter: 01RB(DIR)O-2023-004017 dated 2 November 2023
- 3) Our letter ref. 2210797-37-551 dated 12 February 2024
- 4) Your letter: 01RB(DIR)O-2024-000803 dated 14 March 2024

We thank you for your letter 01RB(DIR)O-2024-000803 dated 14 March 2024, informing us about the decisions made in the 95th meeting of the RRB. We have carefully considered the points raised in this letter and offer the following responses to your questions.

1) *“What was the reason for the warning message in English and Persian to users indicating: “Use caution in regions that may be hostile to Starlink usage. Starlink will not provide information about you or your Starlink usage to law enforcement or governments, ... Use a VPN service to help hide the fact that you’re using Starlink. ...”? (see Figure 1 of the Attachment to Document RRB23-3/8)”*

SpaceX has informed us that they provide notices through their system from time to time. This notice was sent to inform those that may have come into possession of a Starlink terminal and/or established communications through the Starlink systems of the potential for legal action against them for using such a terminal if they were doing so without a license from the territory in which the terminal is located. The text of the message was developed by the

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operator for use in other geographical areas where the use of a terminal could have severe repercussions.

2) *“Could the administrations confirm the capability of the space operator to disable Starlink services over a territory?”*

As reported in reference 3) it is possible for SpaceX to disable a particular earth station if it is brought to its attention. We understand that the space station operator was able to identify the earth stations in question based on the information on the screenshots provided by the reporting administration. The space station operator made a determination to delete the associated user accounts from its list of authorized accounts, and permanently disabled the identified earth stations. We understand that this procedure has been followed for all terminals identified by the reporting administration.

We would like to further re-iterate the response given in our last submission to the RRB in reference 3 above. Any terminals found to be operating without authorization within the territory of the Islamic republic of Iran, or any other country where such authorization has not been given, could be brought to our attention via firmapost@nkom.no. The information will be forwarded to SpaceX for identification and subsequent shutdown of these terminals if found to be used in contradiction with the end user license agreement between the customer and SpaceX.

We appreciate the clarifications made by the RRB on their interpretation of the applicability of Resolution 25 to the case in question. The commitments on a filing administration from the resolves part of this resolution, and other relevant resolutions and articles in the Radio Regulations discussed during this case in the RRB, is met by the fact that the Starlink services are not marketed, sold or can be activated within the borders of any country that has not authorized the service. A Starlink terminal would have to be bought outside such a country, activated with a false customer address in contradiction with the end user agreement with Starlink and unlawfully brought into the country where no authorization is given to the use of the service.

Norway is of the opinion that the requirements set out in the relevant resolutions cannot be interpreted in such a way that filing administrations of satellite systems, FSS or MSS, GSO or NGSO, are obliged to impose on their operators technical requirements that require satellite systems to exclude territories from the downlink coverage areas on the request of other



administrations at any point during the lifetime of their systems. This is not a question of whether it could be technically feasible now or in the future, but if this is what is specifically required from the relevant resolves.

Lastly, we point to the fact that there are studies in the preparation for the WRC-27 under agenda item 1.5 to have a competent WRC decide if new regulations are required to address this issue beyond what is currently found in the Radio Regulations.

With regards

Morten Frestad
Acting Director Spectrum Department

Frode Målen
Head of Section

Electronically approved. No signature required