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| **Council Expert Group on Council Decision 482**  **Third meeting – Geneva, 6-7 June 2019** |  |
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|  | **Document EG-D482-3/5-E** |
| **25 May 2019** |
| **English only** |

Arab Republic of Egypt

COST RECOVERY MECHANISM FOR SATELLITE FILINGS CONTAINED IN DECISION 482

During the second meeting, it was mentioned that “the definition of complexity with respect to non-GSO satellite filings is related to a precise definition of the orbital parameters”. However, the Egyptian administration is in the view of a clear and precise definition of complex satellite filings for non-GSO satellite filings.

With respect to exceptionally complex GSO satellite filings:

* The Egyptian administration notes the report of the Director of the Radiocommunication Bureau to the 80th meeting of the Radio Regulations Board regarding the processing of filings for terrestrial and space systems which indicates that:
* the treatment time of the Advance Publication Information (API) has been maintained around 2 months, i.e. **below the 3-month regulatory deadline**;
* the treatment time of Coordination Requests publication (CR/C) was below the 4-month regulatory deadline during the last trimester of 2018, while being slightly above it at the end of January 2019 (notably because of the end-of-year closure of ITU, which automatically introduces a delay);
* the treatment time of submissions under paragraph 4.1.3/4.2.6 of Article 4 of Appendices 30/30A continues to be **below the 6-month performance indicator set** for this type of satellite networks (there is no regulatory deadline for such submissions in the Radio Regulations) and has continued to decrease since the last meeting;
* the treatment time of submissions under Articles 6 and 7 of Appendix 30B continues to decrease step by step (note that there is no regulatory deadline for such submissions in the Radio Regulations but a 6-month performance indicator has been set for this type of satellite networks);
* the treatment time of Part I-S publications for space stations **oscillated around the 2-month regulatory deadline**;
* the average treatment time of submissions of space stations under Article 11 has stabilised around 6.5-7 months;
* the treatment time of Part I-S publications for earth stations has remained below the 2-month regulatory deadline.
* In addition, as referred in the final report of the second meeting of the Council Expert Group on Council Decision 482 **there is no increase in complex GSO satellite filings as happen in the case of non-GSO satellite filings as the statistics indicate that no GSO satellite filing with more than  
  100 000 units was received by the BR.**
* In this context, the Egyptian administration needs further clarification in the following points:

1. What is the definition of complex and what is the threshold after which the filling becomes complex. (complexity of GSO satellite filings depends on both No. of units and forms of coordination that the BR uses during examination of the file)
2. Percentages of the overall treatment time spent by various categories of staff in processing non-GSO satellite filings and explanation on how these percentages may be affected by the complexity and size of these filings.
3. Information on the processing time of complex GSO satellite networks.
4. What is the percentage of these complex GSO satellite networks.
5. With respect to option 1 in section 6 of the final report, how this could affect cost recovery of fillings and what happens if administrations refuse to modify their fillings.
6. What are the difficulties mentioned in option 1 that were faced by the BR during examination of these files.

* Based on the above, the Egyptian administration considers that there is no urgent need to review the cost recovery for GSO satellite filings. However, Egypt could support adding a break point after which the cost recovery of satellite fillings increases linearly with respect to the no. of units (this break point could be after currently 90% of GSO satellite filing units or in case of no. of units above 100 000 units) taking into consideration that:
* Based on information provided in Document EG-D482-1/6 there are:

1. 31 GSO satellite fillings related to 4 administrations above 100 000 units in comparison with 4 non-GSO satellite fillings related to 2 administrations.
2. 11 GSO satellite fillings related to 2 administrations above 200 000 units in comparison with 1 non-GSO satellite filling related to 1 administration.
3. 6 GSO satellite fillings related to 1 administration above 300 000 units.

* This increase of cost recovery will prevent some administrations to send fillings in a periodic way which could prevent other administrations to finalize coordination and lead to spectrum warehousing.
* That approach will avoid large invoices for the administrations which may lead to increase of non-payment of invoices.
* In addition, assess the processing time taken by the BR for complex GSO satellite filings.

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