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Working Group 5

PROPOSED MODIFICATIONS TO THE DRAFT CPM REPORT

CHAPTER 5, AGENDA ITEM 7, ISSUE I

AGENDA ITEM 7

7 to consider possible changes, and other options, in response to Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference, an advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution 86 (Rev.WRC-07) to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary-satellite orbit;

Resolution **86** (**Rev.WRC-07**): Implementation of Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference

5/7/9 Issue I – Possible method to mitigate excessive satellite network filings issue

5/7/9.1 Executive summary

Resolution **86** (**Rev.WRC-07**) resolved to consider possible changes, and other options, to advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary-satellite orbit. Issues were raised regarding coordination difficulties that arise for newcomer networks, as a result of multiple advance publication and multiple coordination requests submitted to the BR which may be in excess of what is actually required and practically implementable, in which many of these networks are usually suppressed after the expiry of the regulatory deadline time-limit of seven years as a result of not being brought into use or not being notified to the BR. However, during such regulatory time-limit, these networks need to be taken into account by subsequently filed networks and thus complicate the coordination process or even prevent subsequently filed networks to have timely access to the orbital/spectrum resources. This may result in misuse or irrational usage of frequency assignments and associated orbital resources.

Taking into account the number of coordination requests that are suppressed after the seven-year regulatory lifetime, one may infer that such filings, in some cases, could be considered as excessive and could create barriers and difficulties for coordinating later filed satellite networks.

However, uncertainties associated with procedures of effecting coordination properly, may be resolved by submitting multiple filings to provide flexibilities for notifying member states.

This issue aims to address these difficulties by reducing, the number of networks subject to coordination under Section II of RR Article **9** noting that, in some cases, no chance exists that these satellite networks will be brought into use. However, there are valid reasons why administrations file multiple satellite network filings. Uncertainties about the viability of a particular orbital location and the limitation in the Radio Regulations on how far a network can be relocated from its originally filed location without requiring a restart of the RR Article **9** process could lead administrations to file for multiple orbital locations in order to maximize the prospect that its planned satellite network will be brought into use. These factors should be considered when addressing the Methods under this Issue.

This issue was addressed from two perspectives, the first addresses the coordination request (CR/C) excessive filing, in which four methods were proposed, and the second addresses advance publication information (API) excessive filing, in which three methods were proposed.

With respect to coordination request (CR/C) excessive filing, Methods I1.1, I1.2 and I1.3 were proposed to provide a possible way for administrations and the BR to examine a filing at some point before the seven-year regulatory limit and make a determination as to whether the filing should be suppressed. Methods I1 and I2 (along with Method I3) represent a novel approach to tackling the supposed issue of excessive satellite network filings. Method I1.4 proposes No Change.

With respect to Advance publication information (API) excessive filing. Methods I2.1, I2.2 and I2.3 were proposed, the first proposes no change to the RR and the other two methods propose whether to suppress the API for satellite networks subject to coordination under Section II of RR Article **9**, or to remove the six months between the date of receipt of an API and the date of receivability of the associated coordination.

For both the CR/C and API aspects, the methods include a no change (NOC) option.

It is worth mentioning that advance publication information (API) filings procedures, were discussed in detail under § 5/7/3 of Issue C.

5/7/9.2 Background

WRC-12 and previous conferences had introduced notable reinforcement to the current regulatory regime that governs the access to these natural resources. In studying this issue, it has been brought to the attention of the ITU-R that considerable portions of satellite network filings in the phases of advance publication and coordination are usually suppressed by the seven-year regulatory timelimit. Recognizing the uncertainties of coordinating frequency assignments in certain orbital positions in a timely manner, notifying administrations usually submit diverse network filings in order to accommodate these uncertainties and to ensure the availability of these scarce resources. On the other hand, some of these filings are kept in the coordination stage without being brought into use, rather than being suppressed. Consequently, this may result in increasing the coordination requirement and complexities for later-filed networks. As a result, these filings may appear to be an excess to the needs of the notifying administration, whereas some of these filings may have not been brought into use for other reasons. The supposed problem area targeted in Issue I is not caused by administrations correctly applying the RR, it is the failure of administrations with filings in the process to suppress frequency assignments that are not going to be used before the end of the sevenyear regulatory lifetime. However, there is no requirement in the RR to suppress a filing early, even though this may be consistent with the guiding principles of the ITU in the Constitution and Convention, and multiple resolutions for the efficient use of spectrum resources.

Different forms of excessive filings were addressed. One form was the submission of multiple advance publication followed by additional advance publication every 18 months, which create uncertainties for later filings. A second form was submitting multiple coordination request filings, in some cases, every 1 to 3 degrees in some parts of the arc in the same frequency band which creates up to seven years of uncertainty for the later filings. A notable portion of these filings are suppressed after the expiry of the regulatory deadline time-limit of seven years. This results in a large number of network filings that may not be brought into use, adds complexities in frequency coordination process, and can result in inefficient use of radio-frequency spectrum and orbital resources.

One of the primary reasons for administrations periodically submitting multiple API requests at every 2 or 3 degrees around the geostationary orbit is precisely to minimize the impact of the six month delay between BR receipt of the API and CR/C and obtain a clear date of receipt priority as quickly as possible. Subsequent submission of multiple CR/Cs associated with these multiple APIs may be seen as providing some flexibility and reducing the uncertainties associated with the coordination process. On the other hand, these multiple coordination request filings can have a severe impact on later filed networks that are required to coordinate with a large list of networks that are likely to be deleted at the end of their regulatory deadline, which reaches in some cases for almost 70% of the list of coordination requirements for the network coming at a later time, which leads to add more of the complexities and difficulties for coordination process and results in increasing uncertainties for coordinating this networks in timely manner.

Once an administration has submitted the CR/C and paid the cost recovery charges associated with processing the CR/C, there is no financial incentive for the administration to suppress the filing, even those that are not intended to be used. On the other hand, by maintaining a filing until the end of the seven-year period, if there is a change in the satellite network architecture or a new business requirement is developed after the CR/C is filed, the administration can take advantage of the existing satellite network filing. Administrations without the resources available to other larger, more-established space-faring nations, have voiced concerns regarding the current administrative burden required to maintain a filing. While it would be most spectrally efficient to suppress undesired CR/C filings, there exist financial and strategic advantages for maintaining the satellite network filings which administrations may consider over the seven-year regulatory period.

5/7/9.3 Summary of technical and operational studies, including a list of relevant ITU-R Recommendations

In order to address this issue more fully, the BR was requested to provide a statistical analysis of satellite network filings submitted and subsequently suppressed in accordance with RR No. **11.44**. The results of that analysis are shown in Table 5/7/9.3-1 below which lists, by year for the years 2000 through 2006 based on IFICs through 2780 as of 14/10/2014, the number of CR/Cs received, the number of those CR/Cs that were ultimately notified and entered into the MIFR and the number that were ultimately suppressed. Also shown are the resulting percentages.

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TABLE 5/7/9.3-1

Coordination request filing statistics since 2000 to 2006

Year	Request for coordination (No. of networks)	Number of networks in the MIFR	Number of networks suppressed (Total suppression)	Percentage of networks in MIFR	Percentage of networks suppressed
2000	456	107	349	23.46%	76.54%
2001	299	64	235	21.40%	78.60%
2002	220	74	146	33.64%	66.36%
2003	333	149	184	44.74%	55.26%
2004	267	101	166	37.83%	62.17%
2005	253	91	162	35.97%	64.03%
2006	192	64	128	33.33%	66.67%

The number of APIs received in the years 2000-2013 are shown in Table 5/7/9.3-2.

TABLE 5/7/9.3-2

Year	Number of APIs (GSO) received during the year
2000	709
2001	633
2002	289
2003	576
2004	393
2005	572
2006	466
2007	513
2008	567
2009	642
2010	732
2011	777
2012	1135
2013	770

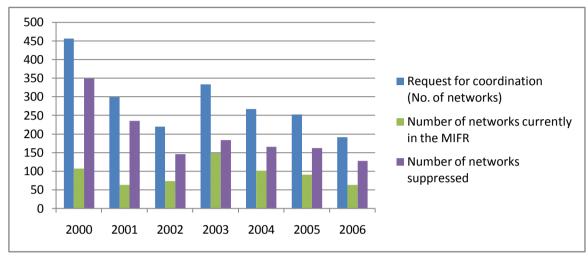
Number of API submission 2000-2013

5/7/9.4 Analysis of the results of studies

The results presented in the previous section reveal that a range from 55% to 70% of the CR/Cs submitted in the period from 2000 to 2006 were ultimately suppressed, after ending the seven-year regulatory deadline, which could be inferred that a notable portion of these networks are suppressed due to failure in fulfilling the coordination requirement in the seven years or for not being notified for operation, based on the bureau findings.

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Considering that payload manufacture may take in some cases minimum 12 months, and in other cases may reach more than 36 months to assemble and manufacture the satellite payload depend on its size, as a result notifying administration may decide at least 12 months to 36 months before ending the seven-year deadline its intent to brought filed frequency assignment for coordination into use or not, however, these files are kept consideration for later comer network for the entire seven years without being suppressed, hindering this later coming network to finalize its coordination requirement in timely manner.



Some member states believe that the number of API filings submitted to the BR since 2000 are excessive and increase the uncertainties associated to the coordination activities of subsequently filed satellite networks, moreover, some member states believes that results of studies under this section have no any evidence supporting that API filing affects coordination process.

5/7/9.5 Methods to satisfy issue I

5/7/9.5.1 Methods to address excessive coordination request (CR/C) filings

5/7/9.5.1.1 Method I1.1: Initial notification and due diligence information without Bureau examination

This method aims to facilitate coordination of satellite networks based on reduction of coordination request filings to the practical and implementable extent possible, by setting milestones for the satellite network status based on the practical facts relating to manufacturing and launching process of satellite payloads, in which the notifying administration shall report to the Bureau at a certain time, at least [three] years before the seven-year regulatory deadline the status of subject network filing by submitting initial notification in a new PARTXS and Resolution **49** information. In case of the absence of Initial notification information, the satellite network filing shall be suppressed.

Initial notification information should be limited to frequency information, shall not add any coordination requirements to the original file submitted in the coordination request, which was the basis identified the coordination requirements for subject network.

The [three]-year limit before the seven-year regulatory deadline could be adjusted to take account of the requirements of some administrations that may have the capabilities to manufacture, launch a satellite payload and brought it into use earlier than the [three]-year above limit; an alternative approach may consist in providing the additional information within the seven-year time limit but at least [$x \le 3$] years before the actual bringing into use of the satellite.

The Bureau shall inform the notifying administration at least [six] months before the time [X] and upon receipt of initial notification PARTXS information, the Bureau shall take necessary actions to

publish this information in the BRIFIC within at least [two] months from date of receipt without any processing or examination of the contained information.

5/7/9.5.1.2 Method I1.2: Initial notification and due diligence information with Bureau examination

This method implements the same procedures adopted in Method II except that the contained information of the initial notification PARTXS will be processed by the Bureau to identify a new list of affected networks i.e. new coordination requirements to subject network, in which notifying member states may modify network parameters including modification orbital location of subject network by $[\pm 1]$ degree.

Submitted information will be subject to examination, and the Bureau should publish these information, not later than [four months], that may contains modified network parameters, new coordination requirements, coordination status updates, and the Bureau findings, which will be subject for comments by affected member states in accordance with RR provisions, as appropriate, however, notifying administration, in adopting procedures under this method, should have lower priority with respect to networks added to coordination requirements list, but will preserve its status versus any subsequently filed network.

This method propose also, that notifying administration should pay a [Z%] of the cost recovery fees of original notification, and remaining [100%-Z%], should be paid for final notification submission.

5/7/9.5.1.3 Method I1.3: Optional submission to initial notification information

This method proposes to implement both procedures described in Methods I1 and I2, but will be subject to decision by notifying administration, that notifying administration may decide whether to submit initial notification information with or without Bureau processing, and in that case it will be not subject to any cost recovery fees, otherwise, notifying administration believes that there is a need to modify subject network filing parameters than originally submitted for coordination, may proceed forward with initial notification submission subject to Bureau processing and examination.

5/7/9.5.1.4 Method I1.4: No Change

This Method proposes No Change (NOC) to the Radio Regulations.

Methods I1.1, I1.2 and I1.3 were proposed to provide a possible way for administrations and the BR to examine a filing at some point before the seven-year regulatory limit and make a determination as to whether the filing should be suppressed. Some administrations believe the addition of a new initial notification step proposed in these three Methods will not result in smaller numbers of future filings because there is not any new requirement or incentive in the methods that will cause an administration to suppress satellite networks filings that are undergoing coordination and for which cost recovery charges have been paid. The information required by the new initial notification notices can easily be filled out by the administration but the addition of this new step will increase the administrative efforts for the administrations and the BR. Finally, the BR will have to expend more resources to process these notices, a cost which will impact the budget of both the notifying administration and BR. As Method I3 is only a choice for an administration between Methods I1 and I2, all of the issues above apply equally.

Some other administrations believe that additional initial notification procedures (named PARTXS), as proposed in Methods I1.1 to I1.3, would allow limited modifications to information submitted, based on results of coordination. The concepts in these Methods provide (to limited extent) ability of notifying member state to reflect these modifications to original filing as resulted from the coordination process, without changing their protection date. Furthermore these methods propose to suppress either the filing or at least the contained frequency and limited modification to the orbital

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location of these filings, consequently, with the purpose of enhancing the reliability of the information contained in the MIFR, and reducing coordination requirements for the subsequent incoming satellite networks.

5/7/9.5.2 Methods to address excessive advance publication information (API) filings

5/7/9.5.2.1 Method I2.1: No change to the API mechanism

No change.

5/7/9.5.2.2 Method I2.2: Suppression of the current API mechanism for satellite networks subject to coordination under Section II of RR Article 9

This method proposes to suppress the need for an API for satellite networks subject to coordination under Section II of RR Article 9.

See also Issue C under WRC-15 agenda item 7 Method C2 options A and B.

5/7/9.5.2.3 Method I2.3: Reducing the number of APIs by removal of six months requirement between API and CRC

There is the requirement in Article **9** of the Radio Regulations, under RR No. **9.1**, for the Radiocommunication Bureau to wait a requisite six months after receiving the advanced publication information (API) for satellite networks requiring coordination under Section II of RR Article **9** before receiving the accompanying coordination request information (CR/C), even if both sets of information are submitted to the Bureau at the same time. One of the primary reasons for administrations periodically submitting multiple API requests at every 2 or 3 degrees around the geostationary orbit is precisely to minimize the impact of this six-month delay between BR receipt of the API and CR/C and obtain a clear date of receipt priority as quickly as possible. Six months after the first set of APIs is submitted the administration is then in a position to have a CR/C accepted immediately at virtually any orbital position. As long as the administration submits the next set of APIs within 18 months of the first set this workaround solution continues.

While this six-month delay may have served a purpose in years past when there was a substantial amount of technical data included in the API for administrations to consider and potentially comment upon, this is no longer the case. As a consequence of the simplification of the Radio Regulations at WRC-95, the API for satellite networks requiring coordination under Section II of RR Article **9** includes very limited information (e.g. orbital position and frequency bands) and, as such, there is little for administrations to review and comment upon. This required six-month delay therefore serves no purpose other than to delay the overall start of the coordination process for satellite networks.

In addition to creating a delay to the start of the coordination process, this six-month period adds considerable uncertainty as to the potential availability of frequency assignments at any given orbital location. Whereas the SRS database maintained by the BR can be queried and carefully examined in the process of searching for and identifying a potential orbital location at which a new satellite network could be launched and operated in a given frequency band, once an API for this new network is submitted there is six months of uncertainty as the filing administration must wait to see if another administration, which may have an API in the vicinity that has already been submitted to the ITU and is still valid, files a coordination request in advance of the BR's receipt of the coordination request associated with the new API. It is therefore not uncommon, and in fact may be considered prudent, for an administration seeking one viable orbital location to submit CR/Cs at multiple locations in order to address this uncertainty. As the administration was truly only seeking one orbital location, the remaining CR/Cs are left to expire at the end of the regulatory lifetime.

Since it is clear that the six-month delay between the BR receipt of an API and CR/C no longer serves a useful purpose, but instead has encouraged: i) a practice whereby large numbers of APIs are periodically submitted to work around this six-month delay, and ii) a situation where multiple CR/Cs are essentially required to be submitted even when seeking only a single viable orbital location, the six-month delay needs to be removed. Note that this issue is being addressed as Issue C under WRC-15 agenda item 7 and that regulatory solutions for this issue can be found under that issue.

Remove the requirement for a six-month delay between the API and BR receipt of a CR/C for satellite networks requiring coordination under Section II of RR Article 9. This would not change requirements for the API or CR/C but would make the coordination request receivable by the BR on the date on which it was received.

See Issue C under WRC-15 agenda item 7 Method C3 option B.

5/7/9.6 Regulatory and procedural considerations for issue I

Should the draft Resolutions associated with Methods I1 to I3 be adopted together with their corresponding Methods, providing options to notifying administrations on how to apply RR Article 11, there would be a need to careful consideration and examination of RR Articles 8, 9, 11, 13, 14 and 15, with in particular RR Article 11, and Council Decision 482 dealing with Cost Recovery.

5/7/9.6.1 Regulatory and procedural considerations for excessive coordination request (CR/C) filings

5/7/9.6.1.1 Method I1.1

ADD

DRAFT NEW RESOLUTION [AI7-I1] (WRC-15)

Initial notification regulatory arrangements for frequency assignments to space radiocommunication stations that are subject to coordination procedure under Section II of Article 9

The World Radiocommunication Conference (Geneva, 2015),

considering

a) that rational and efficient use must be made of the frequency spectrum and the geostationary-satellite orbit and that account should be taken of the provisions of Resolution 2 (**Rev.WRC-03**) relating to the use by all countries, with equal rights and equitable access to the frequency bands and the associated satellite orbits for space radiocommunication services;

b) that Article 44 of the ITU Constitution stipulates that: "In using frequency bands for radio services, Member States shall bear in mind that radio frequencies and any associated orbits, including the geostationary-satellite orbit, are limited natural resources and that they must be used rationally, efficiently and economically, in conformity with the provisions of the Radio Regulations, so that countries or groups of countries may have equitable access to those orbits and frequencies, taking into account the special needs of the developing countries and the geographical situation of particular countries"; c) that ITU-R studies revealed that notable portion of satellite networks usually suppressed after the seven-year deadline expiry as stipulated in No. **11.44** bands;

d) that current uncertainties in effecting coordination for satellite networks may require flexibilities that could be offered by multiple network filings in order to accommodate coordination requirements;

e) that multiple network filings may overflow the coordination requirements for later-filed networks, and result in preventing these networks from accessing the orbit in a timely manner;

f) that reinforcement of the current procedures may enhance the ease of access to the radio spectrum and associated orbital resources multiple network filings and reduces uncertainties and risks associated with effecting coordination and promote flexibility for future expansion,

recognizing

a) that Resolution **807** (WRC-12) resolved to consider possible changes, and other options, in response to Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference, an advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution **86** (Rev.WRC-07) to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary-satellite orbit by the world radiocommunication conference be held in 2015;

b) that Resolution **86** (**Rev.WRC-07**) invited future world radiocommunication conferences to consider any proposals which deal with deficiencies and improvements in the advance publication, coordination, notification and recording procedures of the Radio Regulations for frequency assignments pertaining to space services which have either been identified by the Board and included in the Rules of Procedure or which have been identified by administrations or by the Radiocommunication Bureau, as appropriate,

resolves

1 that notified date of bringing into use of any frequency assignment to a space station of a satellite network shall be not later than seven years following the date of receipt by the Bureau of the relevant complete information under Nos. **9.1** or **9.2**, as appropriate, if responsible administration submits initial notification information [three] years prior to expiry date of this period;

2 if, after the expiry of the period of four years from the date of receipt of the relevant complete information referred to in Nos. **9.1** or **9.2**, as appropriate, the administration responsible for the satellite network effect coordination, as required in Nos. **9.6** or **9.30**, as appropriate has not brought the frequency assignments to stations of the network into use, or has not submitted initial notification information six months before expiry of this period, and has not provided the due diligence information pursuant to Resolution **49** (**Rev.WRC-12**) six months before expiry of this period the corresponding information published under No. **9.5B**, shall be suppressed;

3 initial notification information should be limited to the following:

3.1 modifications to frequency information submitted for coordination;

3.2 coordination status information;

4 upon recipient of the initial notification information, the Bureau shall publish contained information in special section of PARTXS not later than [two months], and publish contained information in BR IFIC, for information purposes. ADD

DRAFT NEW RESOLUTION [AI7-I2] (WRC-15)

Initial notification regulatory arrangements for frequency assignments to space radiocommunication stations that are subject to coordination procedure under Section II of Article 9

The World Radiocommunication Conference (Geneva, 2015),

considering

a) that rational and efficient use must be made of the frequency spectrum and the geostationary-satellite orbit and that account should be taken of the provisions of Resolution 2 (**Rev.WRC-03**) relating to the use by all countries, with equal rights and equitable access to the frequency bands and the associated satellite orbits for space radiocommunication services;

b) that Article 44 of the ITU Constitution stipulates that: "In using frequency bands for radio services, Member States shall bear in mind that radio frequencies and any associated orbits, including the geostationary-satellite orbit, are limited natural resources and that they must be used rationally, efficiently and economically, in conformity with the provisions of the Radio Regulations, so that countries or groups of countries may have equitable access to those orbits and frequencies, taking into account the special needs of the developing countries and the geographical situation of particular countries";

c) that ITU-R studies revealed that notable portion of satellite networks usually suppressed after the seven-year deadline expiry as stipulated in No. **11.44** bands;

d) that current uncertainty in effecting coordination for satellite networks may require flexibilities that should be associated with multiple network filings in order to accommodate coordination requirements;

e) that multiple network filings may overflow the coordination requirements for later-filed networks, and result in preventing these networks from accessing the orbit in a timely manner;

f) that reinforcement of the current procedures may enhance the ease of access to the radio spectrum and associated orbital resources multiple network filings and reduces uncertainties and risks associated with effecting coordination and promote flexibility for future expansion,

recognizing

a) that Resolution **807** (WRC-12) resolved to consider possible changes, and other options, in response to Resolution 86 (Rev. Marrakesh, 2002) of the Plenipotentiary Conference, an advance publication, coordination, notification and recording procedures for frequency assignments pertaining to satellite networks, in accordance with Resolution **86** (Rev.WRC-07) to facilitate rational, efficient, and economical use of radio frequencies and any associated orbits, including the geostationary-satellite orbit by the world radiocommunication conference be held in 2015;

b) that Resolution **86** (**Rev.WRC-07**) invited future world radiocommunication conferences to consider any proposals which deal with deficiencies and improvements in the advance publication, coordination, notification and recording procedures of the Radio Regulations for frequency assignments pertaining to space services which have either been identified by the Board and included in the Rules of Procedure or which have been identified by administrations or by the Radiocommunication Bureau, as appropriate,

resolves

1 that the notified date of bringing into use of any frequency assignment to a space station of a satellite network shall be not later than seven years following the date of receipt by the Bureau of the relevant complete information under Nos. **9.1** or **9.2**, as appropriate, if the responsible administration submits initial notification information [three] years prior to expiry date of this period;

2 if, after the expiry of the period of four years from the date of receipt of the relevant complete information referred to in Nos. **9.1** or **9.2**, as appropriate, the administration responsible for the satellite network effect coordination, as required in Nos. **9.6** or **9.30**, as appropriate has not brought the frequency assignments to stations of the network into use, or has not submitted initial notification information six months before expiry of this period, and has not provided the due diligence information pursuant to Resolution **49** (**Rev.WRC-12**) six months before expiry of this period the corresponding information published under No. **9.5B**, shall be cancelled;

3 the initial notification information should be limited to the following:

3.1 modifications to frequency information;

3.2 orbital location modification within ± 1 degree;

3.3 modifications to service area;

3.4 coordination status information;

3.5 modifications to beams technical information;

4 upon recipient of the initial notification information, the Bureau shall publish contained information in special section named PARTXS not later than [four months], and contained information should be published in BR IFIC within four months upon receipt of complete information, for comments by affected member states.

Note: Should WRC-15 adopt this Resolution, it may wish to consider the appropriateness to invite the Council to review Decision 482.

5/7/9.6.1.3 Method I1.3

Given that Method I3 is based on a choice by the notifying administration between the approaches described in Methods I1 and I2, the appropriate parts of the draft new Resolutions from those two methods would apply for Method I3.

5/7/9.6.1.4 Method I1.4

NOC to the Radio Regulations.

5/7/9.6.2 Regulatory and procedural considerations for excessive advance publication information (API) filings

5/7/9.6.2.1 Method I2.1

NOC to the Radio Regulations.

5/7/9.6.2.2 Method I2.2

For a complete regulatory solution, see § 5/7/3.6.2 (Issue C under WRC-15 agenda item 7 Method C2 options A and B).

5/7/9.6.2.3 Method I2.3

For a complete regulatory solution, see § 5/7/3.6.5 (Issue C under WRC-15 agenda item 7 Method C3 option B).