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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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|  | | **Doc. CPG(23)060 ANNEX V-25C** | |
| PLENARY MEETING | | **Addendum 3 to Addendum 25 to Document XXXX-E** | |
|  | | **5 September 2023** | |
|  | | **Original: English** | |
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| European Common Proposals | | | |
| 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

Part 3: Section 3.1.4 of Addendum 2 to the Report of the Director to WRC-23

Introduction

The Bureau noted that the increase in usage of non-geostationary satellite systems has resulted in a number of new questions, including the practice of splitting a non-geostationary satellite system into several filed systems, which may affect the effectiveness of single-entry epfd limits contained in Article 22 to protect geostationary systems or have an impact in the implementation of Resolution 76 (Rev.WRC-15). The Bureau notes that agenda item 1.19 of WRC-03 studied the issue and section 3.1 of Chapter 3 of the [CPM report for WRC-03](https://www.itu.int/md/R00-CPM-SP-0001/en) concluded that (i) “the only reason for misapplication of […] single entry epfd limits by artificially splitting or combining non-GSO FSS systems, will be to lower the epfd levels and therefore to get a favourable finding status as a result of this regulatory examination” and (ii) that “No difficulties have been experienced so far with similar limits, which could be similarly misapplied”.

The Bureau suggests that the Conference may have to reassess this conclusion in light of recent practices.

Proposal

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CEPT is concerned with the practice of splitting a non-GSO FSS system into multiple filed systems in order to meet single-entry epfd limits. CEPT believes that this issue should be addressed using standard ITU-R processes, as appropriate, and proposes to include a statement in the WRC-23 minutes to that effect. CEPT notes that related work is being carried out under Topic J of WRC-23 agenda item 7. CEPT notes that there is also a link between this issue and the ongoing work on scaling factor.

In view of the above, CEPT proposes that WRC-23 invites the ITU-R to study the impact of the practice of splitting a non-GSO FSS system into multiple filed systems and, in particular, on the possible misapplication of epfd single-entry limits contained in Article **22** of the Radio Regulations.

CEPT therefore proposes to include the following statement in the WRC-23 minutes:

*“The World Radiocommunication Conference 2023 (WRC-23) considers that the possible misapplication of epfd single-entry limits contained in Art.* ***22*** *of the Radio Regulations shall be avoided by administrations. In fact, artificially splitting a unique non-geostationary-satellite-orbit (non-GSO) system in the fixed-satellite service (FSS) into multiple systems can lead to an underestimation of the epfd statistics of that unique system, and may therefore lead to errors with respect to the result of the examination of the epfd single-entry limits contained in Article* ***22*** *of the Radio Regulations by the Bureau.*

*WRC-23 also notes that artificially splitting non-GSO FSS systems may have an impact on other examinations carried out by the Bureau, in particular with respect to Article* ***21*** *(No.* ***21.16.6****) and No.* ***5.551H*** *of the Radio Regulations.*

*In view of the above, WRC-23 invites the ITU-R to study the impact of the practice of splitting a non-GSO FSS system into multiple filed systems and, in particular, on the possible misapplication of epfd single-entry limits contained in Article* ***22*** *of the Radio Regulations.”*

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)