

Telesat view on WRC-27 AI 1.5

TELESATTM

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AI 1.5 WRC-27

- ▲ The issue originally brought into the attention of WRC-23 is associated with reported challenges faced by some member states in relation to the unauthorized operation of some NGSO user terminals
- ▲ The issue of “unauthorized user terminals operation” is not new. It was studied also during the study cycle leading to WRC-19 **for all types of FSS earth stations** and the outcome was Resolution **22 (Rev WRC-23)**
- ▲ Resolution **25 (Rev WRC-23)** also exists with provisions for MSS
- ▲ Telesat has concerns regarding:
 - Proposals that diverge significantly from the provisions and the intent in Res **14 (WRC-23)**
 - Excessive technology-driven differentiation in relation to equivalent/same GSO earth station operation, which risks to unfairly penalize one specific technology

WRC-27 AI 1.5 - Res 14 (WRC-23)

Resolution **14 (WRC-23)**: Studies on development of regulatory measures, and implementability thereof, to limit the unauthorized operations of non-geostationary-satellite orbit (non-GSO) earth stations in the fixed-satellite service (FSS) and mobile-satellite service (MSS) and associated issues related to the service area of non-GSO FSS and MSS satellite systems

Resolves 1

studies on regulatory measures to limit the unauthorized operations of non-GSO FSS and MSS earth stations in the Earth-to-space direction in order to address and cease such operations, taking into account technical and operational aspects, as appropriate

Resolves 2

studies on regulatory measures, taking into account *recognizing c)* with regard to non-GSO FSS and MSS satellite systems, **and the implementability of such measures, without adversely affecting the provision of service in the rest of the service area of the non-GSO satellite system**

Recognizing c)

that Member States may wish to exclude its territory from the service area of the non-GSO satellite system

Current Methods for AI 1.5

Method A	Method B	Method C	Method D
No Change (NOC)	New Resolution	New Resolution	Modification to existing Res 22
	Contain measures in relation to Resolves 1 for, among other things: • Deactivation of unauthorized non-GSO earth stations; and • Procedure for reporting unauthorized operations and actions taken by the Radiocommunications Bureau and RRB		
	Resolves 2		
	Measures taken in respect of <i>resolves 1</i> (e.g. geofencing/NCMC) ensure no service provision in countries where not authorized. Hence, also addresses <i>resolves 2</i> .	Options to address <i>resolves 2</i> are either – a need for explicit agreement from all countries in the world for inclusion in the service area or exclusion at ITU level of the territory of a country from the service area	Similarly to Method B, measures taken in respect of <i>resolves 1</i> ensure no service provision in countries where not authorized Hence, also addresses <i>resolves 2</i> .

Exclusion at ITU level of a country's territory from the service area of a NGSO satellite system (1/2)

- ▲ Method C includes provisions for exclusion from the service area along the lines of those for GSO planned bands (AP30A and AP30B)
- ▲ Discussion at the WP4A meeting in July showed how complex/controversial this issue is
- ▲ Similar proposal under AI 7 for GSO unplanned bands was discussed in WP4A and rejected
- ▲ Agreed by all WP4A that this is an ineffective measure against unauthorized user terminal transmission
- ▲ If a country excludes itself from the service area, this has implications on the status and international rights of that satellite network
 - If an administration wants to be included in the service area at a later stage, the notifying administration of the non-GSO satellite system will need to submit an additional filing containing the additional service area, which would, in case of systems subject to coordination, entail a new priority date for the assignments in question

Exclusion at ITU level of a country's territory from the service area of a NGSO satellite system (2/2)

- ▲ While AI 1.5 was triggered by internet provision to users on land, non-GSO systems can provide a variety of services, including maritime and aeronautical ones, which are global in nature
- ▲ While it is within the sovereign right of all member states to authorize different services in their territories, a full exclusion of a territory from the service area of an NGSO system would render all services unauthorized, thereby also creating gaps in the provision of aeronautical and maritime services.
- ▲ In practice, service provision can be effectively restricted through appropriate measures for *Resolves 1*

Explicit agreement for “inclusion” of a country’s territory

- ▲ Method C includes the requirement for each country to provide “explicit agreement” for their territory to be “included” in the service area of a NGSO satellite system
- ▲ Completely different from *Resolves 2/recognizing c) “ Member States may wish to exclude its territory”*
- ▲ The notifying administration of a NGSO system would need to undertake a substantial effort, requiring an action from most countries worldwide, even though many of these nations do not have any issue with NGSO service provision in the first place and may have limited resources.
- ▲ Overall:
 - outside the scope of Resolution **14 (WRC-23)**
 - huge undertaking by the notifying administration
 - will cause administrative delays and gaps in service provision

Conclusions

▲ Overall, there is a need to oppose

- any departures from WRC-23 agreed provisions
- concept of explicit agreement for inclusion of the territory of a country
- exclusion at ITU level of the territory of a country from the service area
- undue differentiation with respect to the same/similar GSO operation

All NGSO stakeholders do not support Method C, as excessively punitive and discriminatory towards a specific technology.

Explicit agreement for inclusion or exclusion from the service area at ITU level will place NGSO systems at a distinctive disadvantage with respect to GSO systems, while failing to effectively prevent unauthorized operation

Need to strike a balance between the concerns of some Administrations and a fair treatment and operational viability for all satellite systems

Thank you!