

*Check against delivery*

**Agenda Item No. 15: Examination of the Physical Nature and Technical Attributes of the Geostationary Orbit and Its Utilization and Applications, including in The Field of Space Communications, As Well as Other Questions Relating to Developments in Space Communications, Taking Particular Account of the Needs and Interests of Developing Countries, Without Prejudice to The Role of the International Telecommunication Union**

**Thank you Chair**

Pakistan believes that the Geostationary Orbit (GSO) is a limited natural resource which must be made available to all Member States on an equitable basis irrespective of their technical capacities and its use must be governed by the relevant provisions of the ITU constitution and Outer Space Treaty of the United Nations.

**Chair,**

Pakistan has an in-orbit GSO satellite, the Paksat-1R at 38°E. This satellite provides telecommunication services in C and Ku bands. The launch of the next GSO satellite, the Paksat-MM1 at 38.2°E is planned during 2024 as well. This would be a multi-mission communication satellite consisting of L-, C-, Ku- (planned & unplanned) and Ka-band payloads. It will allow millions of Pakistani citizens to have access to advanced telecommunications services.

Moreover, we also consider that equitable access to spectrum and orbital resources at Geostationary Orbit has several regulatory challenges at the International Telecommunication Union (ITU) platform. Some specific regulations are creating difficulties in permitting unbiased distribution of this limited natural resources to the Member States. Equitable access to frequency and orbital resources is a big challenge for new entrants in the commercial space industry. There are as follows:

1. The planned space services specifically aim to ensure the principle of equitable access to the satellite orbit and frequency spectrum for broadcasting satellite services (BSS) and fixed satellite services (FSS) in

accordance with Article 44 of the ITU Constitution. The Table of Frequency Allocations contained in Article 5 of International Radio Regulations (IRR) have many frequency bands for space services but there are only a few frequency bands that are used for planned space services (IRR Appendices 30, 30A and 30B).

2. Resolution 170 (from the World Radio Conference 2019 i.e. WRC-19) defines some procedures for additional systems in the FSS plan. This procedure has created difficulties for new ITU Member States in order to obtain national allotments in FSS plans without coordination with other Member States. National allotments could not be directly obtained under Article 7 of Appendix 30B procedure despite the fact that these requests received preferential treatment by the ITU. The solution of this issue was also under consideration in WRC-23.
3. The unplanned space services are based on a first come, first serve basis. New entrants do not have access to desired spectrum and orbital resources as the early users have already utilised all. This limited natural resource is difficult for new entrants / countries that do not have the technology or are late in their application to ITU. A country cannot even provide unplanned space services within their own national territory without going through hectic frequency coordination procedures.
4. Certain provisions of ITU-RR (especially No. 11.49) have developed a monopoly of active space entities for decades. It has been observed that satellite operators perform satellite manoeuvres for temporary operations at particular orbital slots for 90 days to fulfil ITU's condition and then remove the satellite claiming suspension of satellite operations under No 11.49 to retain the GSO for next 3 years. In some cases, this practice is repeated several times for an orbital slot thereby restricting the access of others to nearby orbit slots for commercial use outside the country's territory.
5. With the introduction of Mega LEO constellations, the protection of GSO satellites from harmful interference is severely undermined because of the criterion which was developed when a constellation of 288 satellites was considered large. The other issues of these Mega LEO constellations

are the overpopulation of orbits and irrational use of limited spectrum resources.

**Chair**

Lastly, we consider that in order to ensure sustainability of the optimum utilisation of geostationary orbit, it is necessary to continue discussions on this issue. The Subcommittee may also consider the revision of this agenda for inclusion of other satellite orbits (LEO, HEO, MEO) for sustainability of the optimum utilisation of orbit and spectrum resources through the technical studies by ITU, creation of appropriate working groups and intergovernmental panels, as necessary.

**I thank you**

----- **End of Statement** -----