



Document
RRB24-1/DELAYED/2-E
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Original English

Director, Radiocommunication Bureau

**FURTHER SUBMISSION BY THE ADMINISTRATION OF THE ISLAMIC
REPUBLIC OF IRAN IN RESPONSE TO THE SUBMISSIONS FROM THE
ADMINISTRATIONS OF NORWAY AND THE UNITED STATES REGARDING
THE PROVISION OF STARLINK SATELLITE SERVICES IN THE TERRITORY
OF THE ISLAMIC REPUBLIC OF IRAN**

The attached delayed submission from the Administration of the Islamic Republic of Iran, in response to the submissions from the Administrations of Norway and the United States as contained in [Documents RRB24-1/11](#) and [RRB24-1/13](#) respectively, regarding the provision of STARLINK satellite services in the territory of the Islamic Republic of Iran, is for the consideration of the Radio Regulations Board.

Attachment.

Attachment

ISLAMIC REPUBLIC OF IRAN
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To: Mr. Maniewicz,
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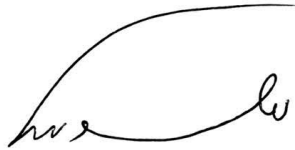
Reference: a) Document RRB24-1/10-E dated 12 February 2024
b) Document RRB24-1/11-E dated 12 February 2024
c) Document RRB24-1/13-E dated 13 February 2024

Subject: Provision of unauthorized Starlink satellite services in the territory of the Islamic Republic of Iran

Dear Mr. Maniewicz,

Pursuant to the submissions of Administrations of Norway and United States referenced above and the document submitted by I.R. of Iran to RRB-95, this Administration feels necessary to provide brief comments to the above-mentioned letters as contained in the Attachment for the consideration by distinguished members of RRB in the upcoming meeting.

Yours Sincerely,



Amir Mohammadzadeh Lajevardi

President of Communications Regulatory Authority

Attachment

Further to the documents submitted by Administrations of Norway and United States, this Administration would like to provide brief comments in response to the above-mentioned messages for consideration by the distinguished RRB Members as follows:

Under Question No.1, the Administration of Norway stated the following:

Quote

"... Our understanding is that the STARLINK system operating under FSS in frequency bands above 3 GHz is out of scope of this resolution..."

Unquote

Response from the Administration of the I. R. of. Iran:

Even though Recommendations-R M.1343 and ITU-R M.1480 may make reference to operation of GMPCS in the range of 1-3 GHz, however neither the title of Resolution 25 (**Rev.WRC-23**). "Operation of global satellite systems for personal communications" nor the resolves part of Resolution 25 (**Rev.WRC-23**), "Administrations licensing global satellite systems and stations intended to provide public personal communications by means of fixed, mobile or transportable terminals shall ensure, when licensing these systems and stations, that they can be operated only from the territory or territories of administrations having authorized such service and stations in compliance with Articles 17 and 18, in particular No. 18.1" do not limit the scope of this Resolution to specific frequency band but merely referred to fixed, mobile or transportable terminals. Consequently, it is clear that the Starlink system is within the scope of Resolution 25 (**Rev.WRC-23**).

The Administration of Norway in response to Question No.1 in the last part of paragraph 2 on page 3 of its document stated that:

Quote

"...STARLINK also has in place significant operational limitations that prevent individuals within the territory of the Islamic Republic of Iran from ordering STARLINK terminals as well as obtaining the network service..."

Unquote

Response from the Administration of the I. R. of. Iran:

This statement is NOT factual due to the fact that despite of such claim smuggled terminals continued to communicate with Starlink at the time of sending this contribution / comment to RRB.

Similarly, the Administration of United States in response to Question No.1 in the second sentence of paragraph 1 on page 3 of its document stated that:

Quote:

"...when a prospective user attempts to place an order for starlink, starlink report its internal system check the location of address entered by the user and if an address is located in the territory in which the use of starlink is not offered, these systems prevent that order being completed. Starlink also has processes in place to ensure that the earth stations are not shipped to the locations where the service has not been authorized...."

Unquote

In addition to the contractual prohibitions, the above paragraphs refers to limitations by Starlink for ordering Starlink service and shipment of earth stations, if the address entered by user is in a territory where the service has not been authorized. But no other measures or operational solution has been referred to ensure that earth stations including the smuggled terminals can be operated only from the territory or territories of administrations having authorized such service and stations.

As a result, providing contractual limitation and other referred measures are not an operational restriction or solution for such a global satellite system and will not function to remedy or prohibit the illegal /unauthorized usage of the satellite terminals in a very large area of the territories of those administrations from which no authorization has been obtained.

The Administration of United States in response to Question No. 1 in the second paragraph on page 3 of its document stated that:

Quote

".....Beyond these policies, it is neither possible nor practicable to determine the intention of the user to import or operate a Starlink terminal into a territory in which the service has not been authorized....."

.....once a terminal has been purchased and the service initiated with the space station operator in a country where such services are authorized it is not practicable for the space station operator to check every single user terminal that communicates with its space station worldwide to see whether there are instances in which such user terminals have been brought into another country"

Unquote

Response from the Administration of the I. R. of. Iran:

This statement is also NOT factual due to the fact that despite of such claim smugly imported terminals continued to communicate with Starlink at the time of sending this contribution / comment to RRB.

Consequently, in spite of the United States claims, this Administration reiterates that (as mentioned in document No. RRB23-3/8-E to RRB-94 and reproduced in Annex 1) once a terminal turns on/ start to operate in a location within the I.R. of Iran territory, a message will be appeared for the user in English and Persian languages giving caution to the users that *"Starlink will not provide information about you or your Starlink usage to law enforcement or governments, however the websites, apps and services you access and any entities monitoring those services might be able to see you are using Starlink "* This clearly proves that the Starlink system would be /is aware of the location of the smuggled/ illegally imported terminals in the I.R. of Iran and has the ability to disable them/ deny access. Moreover, the founder of the SpaceX tweets in 2022 (as mentioned in document No. RRB23-1/7-E to RRB-92 and reproduced in Annex 2) officially and publicly stated that some Starlink terminals are active in I.R. of Iran which is a clear evidence that the Starlink is aware of the location of smuggled/ illegally imported terminals.

In addition to the above clear evidences, there are possibilities for Starlink management center to determine the location of its terminals and cease / deny the access of the terminals to Starlink system when operate in a country from which authorization has NOT been obtained. For instance, one solution could be that upon turns on/setup process or within a specified time interval, Starlink terminals transmit a message to the network which includes terminal ID as well as its location which results in a determination as it is located in territories of administrations having authorized such service.

The Administration of United States in response to Question No. 2 stated that:

Quote

".....space station operator made a determination to delete the associated user account from its list of authorized accounts and permanently disabled the identified earth stations.....we understand that this procedure has been followed for all terminals identified by the reporting administration."

Unquote

The Administration of Norway in response to Question No.3 stated that:

Quote

"... We want to be clear on that the transmission of the starlink terminals identified and reported by the Islamic republic of Iran have not been authorized the Administration of Norway. STARLINK as network operator confirm that these transmissions have not been authorized by them either...."

Unquote

Response from the Administration of the I. R. of Iran:

As mentioned by this Administration in the documents to the previous RRB meetings, the unauthorized terminals deployed by this Administration for the measurement purpose in order to provide evidences for the distinguished RRB members that such service is illegally available/ rendered in territory of the Islamic Republic of Iran. From the response of the Administration of United States, it seems that only the earth stations / terminals used for the measurements by the Administration of I.R. of Iran were disabled, while many other terminals which smuggled to / illegally imported in the Islamic Republic of Iran are still illegally operating.

The responsible Administrations of the Starlink system are kindly requested to provide evidence that how other smuggled terminals are disabled/ denied access or will be disabled/ denied access.

Administrations licensing global satellite systems shall ensure that their terminals can be operated only from the territory of administrations having authorized such service, as it is not possible and practicable for other administrations to identify the smuggled terminals to Starlink in order to disable them.

In the light of the foregoing, Starlink continues providing service in the territory of the I.R. of Iran after more than a year, despite the obligations under Article 18 and Resolutions 22 and 25 and decisions of RRB to disable / deny access.

Thus, the Administration of I.R. of Iran requests the distinguished members of the RRB to have a concrete decision regarding this consecutive infringement of Constitution and Radio Regulations of ITU and oblige the relevant Administrations to cease immediately the service availability in I.R. of Iran.

Annex 1- Caution message

The screenshot shows a mobile phone interface with a dark background. At the top, the status bar displays the time 17:23, signal strength, Wi-Fi, and battery icons. Below the status bar, the title "USE STARLINK WITH CAUTION" is displayed in white. The main text is in English, followed by a Persian translation. The English text includes: "Use caution in regions that may be hostile to Starlink usage. Starlink will not provide information about you or your Starlink usage to law enforcement or governments, however the websites, apps, and services you access and any entities monitoring those services might be able to see you are using Starlink. This may include but is not limited to: Services run by the government or entities that may be compelled to report to the government. Services run within the geographic region controlled by a government, or otherwise in a position to monitor internet traffic. Precautions you may want to take include but are not limited to: Don't use websites, apps, or services that could be monitored by these entities, including previously installed apps and services running in the background of your devices. Use a VPN service to help hide the fact that you're using Starlink. Ensure the VPN is always active when using sensitive services, including apps and services running in the background of your devices." The Persian text below reads: "در استفاده از استارلینک (Starlink) احتیاط کنید. در استفاده از استارلینک (Starlink) احتیاط کنید، به خصوص در مناطقی که ممکن است برای استفاده از استارلینک خطراتی وجود داشته باشد و یا از طرف دولت موانعی وجود داشته باشد. استارلینک اطلاعاتی درباره شما یا استفاده شما از استارلینک را در اختیار نیروی انتظامی یا دولت ها قرار نمی دهد. ولی وب سایت ها، برنامه ها و خدمات اینترنتی که از آنها استفاده می کنید و هر نهاد و یا دولتی که بر این خدمات نظارت می کند، ممکن است مطلع شوند که شما از استارلینک استفاده می کنید. نمونه هایی که ممکن است استفاده شما از استارلینک را مشخص کند، ولی محدود به این لیست نمی شود، عبارت است از: استفاده از خدمات اینترنتی که توسط دولت اداره می شود، و یا توسط نهادهایی اداره می شود که ممکن است ملزم شوند به دولت گزارش دهند. استفاده از خدمات اینترنتی که در مناطقی اداره میشوند که توسط".

Annex 2- The founder of the SpaceX'S tweet

