



May 6, 2019

VIA ECFS

Marlene H. Dortch
Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: Mitigation of Orbital Debris in the New Space Age, IB Docket No. 18-313

Dear Ms. Dortch:

The Satellite Industry Association (“SIA”)¹ submits these reply comments in response to the above referenced proceeding (the “Orbital Debris NPRM”).² As SIA noted throughout its initial comments, orbital debris mitigation, along with space traffic management (“STM”) and space situational awareness (“SSA”), demand a whole-of-government approach in order to ensure that a single set of comprehensive, effective, and efficient regulations are adopted to govern these critical aspects of safe space operations. As it considers adopting the proposed rules or changes in the Orbital Debris NRPM, the Federal Communications Commission (“Commission”) should give appropriate consideration to the expertise and resources of other federal agencies with relevant technical and mission experience to ensure regulatory certainty, transparency, and comprehensiveness across all licensing authorities and mission profiles.

To achieve that end, SIA supports the creation of an interagency working group for the development of a unified, and cohesive U.S. policy on safe space operations. The Secretary of Commerce, in coordination with the Secretary of Transportation, the Secretary of Defense, the Secretary of State, the Director of the Office of Science and Technology Policy, and the National Aeronautics and Space Administration, should work with the Commission, to ensure that Federal Government activities related to STM, SSA, and orbital debris mitigation are developed on a

¹ SIA Executive Members include: AT&T Services, Inc.; The Boeing Company; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; Spire Global Inc.; and Viasat, Inc. SIA Associate Members include: ABS US Corp.; Airbus Defense and Space, Inc.; Analytical Graphics, Inc.; Artel, LLC; Blue Origin; DataPath Inc.; Eutelsat America Corp.; ExoAnalytic Solutions; Globalstar, Inc.; Glowlink Communications Technology, Inc.; HawkEye 360; Hughes; Inmarsat, Inc.; Kymeta Corporation; Leonardo DRS; Panasonic Avionics Corporation; Peraton; Planet; SSL; Telesat Canada; Ultisat, Inc.; and XTAR, LLC. For more information on SIA, see www.sia.org.

² *Mitigation of Orbital Debris in the New Space Age*, Notice of Proposed Rulemaking and Order on Reconsideration, IB Dkt No. 18-313, FCC 18-159 (rel. Nov. 19, 2018) (“Orbital Debris NPRM”).



unified and coordinated basis to ensure an effective, integrated regime that balances innovation with space safety for all spacefaring activities authorized by the United States. Such whole-of-government collaboration will enable development of a single, comprehensive U.S. policy on STM, SSA, and orbital debris mitigation, thereby helping to ensure the long-term sustainability of the space environment.

Respectfully submitted,

/s/

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