The United States of America’s commercial launch and reentry industry supports and facilitates the nation’s core & critical national security, scientific, and economic policy objectives. Recognizing the collaborative, important, and necessary partnership that industry has with the FCC, America’s commercial space industry appreciates the opportunity to provide feedback to its proposed rulemaking and looks forward to continued collaboration on matters relating to spectrum usage.

This industry coalition response, which represents the most active commercial launch and reentry providers in the United States, applauds the Commission for initiating a much-needed effort to update and improve its processes for commercial launch and reentry spectrum access. The commercial launch and reentry industry has expanded both in the number of launches/reentries and providers since the Commission last reviewed these processes in 2013; industry is encouraged by the Commission’s work to ensure it keeps pace with technological and market developments.

Accordingly, our industry coalition supports the following items under consideration:

- ** Adopting a primary space operations allocation for the 2200-2290 MHz band and the 2025-2110 MHz band, provided industry is not limited to these bands. **
  
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- ** Expanding use of the 2200-2290 MHz allocation beyond the proposed sub-bands and allow any portion to be used for launch/reentry activities. **
• Using the 420-430 MHz, 2025-2110 MHz, and 5650-5925 MHz bands for additional access opportunities not supported in the 2200-2290 MHz band, provided industry is not limited to these bands.

This coalition respectfully requests additional consideration on these following areas in the proposed action, to alleviate concerns broadly held among members:

• **Commercial space support for federal users:** The commercial space industry’s activities are symbiotic with federal spectrum users. Commercial launch and reentry vehicles facilitate many of the government’s missions utilizing the same hardware and same spectrum bands as used during commercial space operations. In working to provide regulatory certainty and improved efficiencies in the licensing framework, this interdependence should be accounted for as commercial entities apply for commercial spectrum use.

• **Use of other spectrum bands:** While the coalition strongly supports the Commission’s efforts, the Commission should be aware that its actions may have unintended consequences for access to spectrum. For example, requests for bandwidth use beyond those approved in the 2021 Report and Order\(^1\) are already being met with non-concurrences by federal users with directions to only use approved frequencies. Such results undermine the Commission’s stated goal of supporting a dynamic and growing industry. Without clear direction from the Commission, frequencies utilized by hardware already or currently in development can expect to be denied access via current standard processes. To this end, this coalition suggests that explicit language be included in the final rule that states explicitly that launch and reentry are not limited to the proposed spectrum bands and no bias is created by the Commission’s actions in this proceeding.

• **Single rule for all mission stages:** The Commission should also recognize that the space industry is expanding beyond the legacy operations of the past. For instance, in many cases the vehicles performing launch and reentry activities also have an on-orbit component to their mission. A truly streamlined process that supports next-generation space services should treat vehicles the same, no matter what stage of the mission they are operating, whether it’s initial testing, launch, in-orbit, or re-entry. A vehicle does not change its fundamental characteristics at each stage, and

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neither should the rules governing its operations. Under the proposed rule, an additional burden is potentially being placed on these operators to coordinate within the secondary authorization for launch and reentry and then also seek temporary authorization for on-orbit activities even if both activities use the same hardware and frequencies. **This coalition encourages the FCC to consider rules that treat a single vehicle using a single system the same at all stages of operation.** Otherwise, rather than achieving the Commission’s goals of streamlining the process, it risks making future operations even more cumbersome. The Commission should therefore consider including on-orbit activities in its streamlined processes.

Recognizing the recommendations put forth above, this Coalition appreciates the opportunity to contribute toward future rulemakings by the FCC that may address these issues. To that end, for any future rulemakings under consideration by the FCC, this coalition stands by principles previously submitted². For completeness, they are included herein:

**Simplify, Streamline, and Automate**

- **Improve spectrum access for commercial launches.** Despite the unprecedented advances in the commercial launch industry in the United States, launch providers must still make one or more requests for special temporary authority (STA) for every launch because no spectrum is currently allocated for this purpose, even on a secondary basis. The Commission should address the lack of spectrum allocation. Additionally, the Commission can reduce the costly risk associated with acquiring these STAs by allocating and adopting service rules for spectrum designated for commercial launch.

- **Streamline the coordination process with other spectrum users to ensure safety for all users of shared spectrum bands.** To maintain safe and secure launch services, launch providers will continue to coordinate with other users of the spectrum. This coordination is necessary to ensure both that other uses of the spectrum do not disrupt mission critical operations during launch, but also that launches do not interfere with other essential uses of shared bands. To continue the viability of this coordination as launch cadences increase, the processes must be streamlined, such as using blanket coordination agreements and launch notification processes.

• Automate the application and review process to increase transparency, reduce duplication, and eliminate risk for mission critical operations. The outdated manual process for securing STAs can be slow, cumbersome, and often opaque, risking the delicate balance necessary to successfully launch payloads that cost tens or even hundreds of millions of dollars. Through automation, the Commission can speed up, smooth out, and clarify the process. The coalition stands ready to work with the Commission to develop a launch portal through which all stakeholders have transparent access to the review process. This new portal would also modernize the current intergovernmental coordination process, currently conducted by email for every application.

Sincerely,

/s/ Martin Attiq  
Martin Attiq  
Chief Business Officer  
Astra

/s/ Sagi Kfir  
Sagi Kfir  
Senior Legal Counsel  
Blue Origin

/s/ David Caponio  
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