

November 2, 2020

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20554

Re: *FCC Launch and Reentry Licensing (ET Docket No. 13-115)*

Dear Ms. Dortch:

An industry coalition (“the Coalition”) representing Blue Origin, Relativity Space, Sierra Nevada, SpaceX, and Virgin Orbit, together the Nation’s leading commercial launch and reentry services providers, files the attached consensus principles related to launch and reentry spectrum licensing, with regard to above referenced proceedings.

The Coalition appreciates the Commission’s attention to this urgent issue and urges the Commission to undertake appropriate reforms of its launch and reentry licensing processes consistent with the direction outlined in Space Policy Directive 2 (SPD-2). Timely Commission action can help facilitate a rapidly growing commercial space industry that supports the public interest, streamlines outdated regulatory procedures, and protects spectrum use for both Government and commercial users.

As a continuation of the Commission’s ongoing dialogue with stakeholders, we strongly encourage the Commission to incorporate the consensus principles outlined below into any proposed rulemaking and to hold additional dialogues with the Coalition prior to publishing any draft rules.

Sincerely,

/s/ Audrey Powers
Audrey Powers
Vice President, Legal & Compliance
Blue Origin

/s/ Caryn Schenewerk
Caryn Schenewerk
Vice President of Regulatory & Government Affairs
Relativity Space

/s/ Steve Lindsey

Steve Lindsey
Senior VP, Strategy & Programs
Sierra Nevada Corporation

/s/ David Goldman

David Goldman
Director, Satellite Policy
SpaceX

/s/ Collin Corey

Collin Corey
Manager, Safety & Mission Assurance
Virgin Orbit

FCC Launch & Reentry Spectrum—Consensus Industry Principles Improve, Streamline, and Automate

America's commercial launch industry supports the nation's critical national security, scientific, and economic policy objectives. This industry coalition, which represents the leading commercial launch 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 industry has expanded both in number of launches and providers since the Commission last reviewed these processes in 2013 and is encouraged by the Commission's work to ensure it keeps pace with technological and market developments. To aid in this effort, this coalition offers the following principles for any update to the Commission's processes:

- **Improve spectrum access for commercial launches and reentries.** 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 and reentry because no spectrum is currently allocated for these purposes, even on a secondary basis. The Commission should address this 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/reentry.
- **Streamline the coordination process with other spectrum users to ensure safety for all users of shared spectrum bands.** To maintain safe and secure launch/reentry services, commercial 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/reentry, but also that launches and reentries do not interfere with other essential uses of shared bands. To continue the viability of this coordination as the cadence of launches and reentries increases, the processes must be streamlined, such as using blanket coordination agreements and launch/reentry notification procedures.
- **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/reentry 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.

The coalition recognizes that its use of spectrum is time and location limited. By adhering to these three simple principles, the Commission can ensure the United States maintains its position as the global leader in commercial space.