



March 9, 2026

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

Re: Satellite Licensing and Milestone Extension/Waiver Request - SAT-MOD-20260129-00065

Dear Ms. Dortch:

The U.S. Chamber of Commerce (“Chamber”) appreciates the opportunity to provide input on the Federal Communications Commission’s (“FCC” or “Commission”) satellite licensing and milestone frameworks.

Space Modernization and Innovation

In October, Chairman Carr spoke about the FCC’s efforts to modernize its space licensing regime as part of the President’s Build America Agenda. This is critical to America winning the second space race and the Chamber commends the Commission for seeking to update outdated regulatory frameworks to keep pace with the evolution of modern satellite systems and the rapidly growing space economy.

U.S. businesses are making multi-billion-dollar investments in building Low Earth Orbit (LEO) satellite constellations that will ensure the United States leads the world in developing LEO for commercial purposes. Once deployed and operational, the services these constellations provide will have a massive impact on America’s economy. U.S. companies have invested in complex manufacturing processes to build these constellations, and innovation from these efforts is being transferred to other manufacturing activities, which is regenerating American industrial capability.

Threatening this is a bottleneck in the transportation system that has emerged from the lack of available heavy-lift launch vehicles and space launch sites nationwide to deploy these constellations. This is preventing satellite operators from delivering value to their customers and getting a return on the invested capital.

The chronic delays impacting heavy-lift launch providers are beyond the satellite operator’s control. The Chamber strongly believes that satellite operators who

can demonstrate the readiness to deploy at scale should not face undue penalties for delays such as launch vehicle availability, range limitations, scrubs, or government mission prioritization.

Milestone Extensions

The FCC designed the milestone rules to prevent spectrum warehousing. It did not account for the evolution of satellite constellations and large-scale deployments in LEO which require a much greater supply of launch vehicles to support a more frequent launch cadence than was required under previous architectures.

In this case, U.S. companies are actively working to deploy their satellites and utilize the allocated spectrum. Strict enforcement of interim milestones by the FCC due to the lack of launch capability and availability could halt launches that have been bought and paid for and interrupt deployment. This will delay the expansion of broadband services and reduce competition in the marketplace, which benefits the American consumer.

As operators remain on track to meet final deployment milestones, the Chamber recommends that the FCC restructure penalties for missed interim milestones to reduce the number of authorized satellites rather than halting deployment entirely. This approach would prevent unnecessary disruptions to active deployment efforts while upholding the Commission's goal of preventing spectrum warehousing.

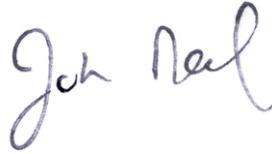
Granting relief in such cases serves the public interest. It would align U.S. milestone rules with international standards that the FCC seeks to accomplish in its space modernization proceeding. Operators who are investing billions of dollars in their workforce, manufacturing facilities and launch infrastructure should be supported in their efforts to deploy their constellations so we can connect rural and underserved communities, advance U.S. broadband goals, and strengthen the Trump Administration's industrial policy objectives.

Conclusion

The Chamber strongly supports the Commission's efforts to modernize space and earth station licensing rules. By aligning U.S. milestone frameworks with international standards, restructuring penalties, and ensuring flexibility in enforcement, the FCC can foster innovation, attract more investment into this industry, and maintain U.S. leadership in the global space economy.

We appreciate the Commission's consideration of these comments and look forward to continued collaboration on this important initiative.

Sincerely,

A handwritten signature in black ink that reads "John Neal". The signature is written in a cursive, flowing style.

John Neal
Vice President, Space Policy
U.S. Chamber of Commerce