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Secretary  
Federal Communications Commission  
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Washington, DC 20554

## **U.S. Chamber of Commerce Ex Parte Submission to the FCC on Space Modernization for the 21st Century, SB Docket No. 25-306**

### **Introduction and Interest of the U.S. Chamber of Commerce**

The U.S. Chamber of Commerce (“the Chamber”) appreciates the opportunity to participate in the Commission’s Space Modernization for the 21st Century proceeding, regarding the Notice of Proposed Rulemaking (“NPRM”). The Chamber represents a broad cross-section of diverse businesses, including terrestrial operators and many in the space economy, such as satellite manufacturers, launch providers, and operators. Based on input from Chamber members, the Chamber supports the Federal Communications Commission’s (“the Commission”) goal of achieving an efficient and modern space and earth station licensing system and offers the following observations in furtherance of that goal.

### **Overview: Support for Streamlining and Modernization**

The Chamber supports efforts to expedite the processing of applications; however, we strongly caution that procedural streamlining must not come at the expense of the Commission's essential transparency, stakeholder participation, or the legally protected rights of incumbent spectrum users. Specifically, proposed changes, particularly those that affect spectrum sharing with terrestrial operators, whether co-channel or adjacent channel, must be deliberate and measured. It is critical to recognize the careful balance achieved by the existing frequency-specific rules. To that end, no rule change resulting from this proceeding should result in any substantive change to established rights under the banner of procedural reform.

Chamber members generally view this procedures-focused NPRM as a net benefit to satellite manufacturers, operators, and the Commission. Streamlining and expediting licensing and authorization processes will reduce regulatory friction, promote investment, and support the Commission’s goal of making the United States the licensing forum of choice for space systems.

The Chamber supports the Commission’s efforts to streamline application processing and reduce unnecessary regulatory burdens so that authorizations can be issued more quickly and predictably.

### **Modernizing Earth Station Licensing**

We also support modernizing earth station licensing by transitioning from site-by-site licensing to nationwide, non-site-based licensing for earth stations in appropriate bands, such as those bands that are not shared between satellite and terrestrial operators. This approach can lower administrative costs while maintaining effective spectrum management and interference protection.

### **International Alignment and NGSO Licensing Framework**

We strongly support aligning the Commission’s processes with International Telecommunication Union (ITU) filing and coordination practices, including updating Non-Geostationary Orbit (NGSO) buildout milestones to better reflect ITU requirements. The current Commission’s milestone regime can impose undue burdens on NGSO licensees—especially large broadband constellations—by not fully accounting for the complexity of these systems and constraints on launch cadence. The proposed framework better balances the Commission’s objective of promoting U.S. leadership and reducing unnecessary burdens with the need to protect spectrum and orbital resources.

The Chamber also joins many other commenters in supporting the removal of the surety bond requirements for NGSO satellite systems of less than 200 spacecraft.

### **Maintain Part 25 Technical Standards While Focusing Part 100 on Process**

The Chamber supports retaining the existing technical elements and standards of Part 25, while separating spectrum-specific details and preserving

the current spectrum-sharing framework. This keeps the NPRM focused on process improvements and reduces the risk of creating unintended technical complexity in this or future proceedings.

### Targeted Refinements and Clarification for the Final Rules

While the Chamber and its members broadly support the direction of the NPRM, several areas would benefit from additional clarity in the final rules or subsequent guidance. In finalizing Part 100, the Chamber also urges the Commission to incorporate several targeted refinements that are broadly supported in the record:

- **Expedited processing and federal coordination:** Remove the proposed exception that would exclude applications involving bands subject to federal coordination from expedited processing, while working with NTIA to implement a modernized coordination framework that maintains robust protections for federal operations.
- **Definitions for clarity and continuity:** To reduce ambiguity and promote continuity, adopt into Part 100 the existing Part 2 and Part 25 definitions of “space station,” “satellite,” and “spacecraft.”
- **Nationwide, non-site based earth station licensing:** Transition to a nationwide, non-site based licensing framework with registration for immovable earth stations, supported by a robust, automated database similar to that used in the 70/80/90 GHz bands.
- **IT modernization:** Successful implementation of Part 100 will also depend on the Commission’s ability to invest in modern IT infrastructure so it can deliver on the policy enhancements in Part 100. We urge the Commission to allocate funding and staff oversight to develop and test filing software that can support Part 100 implementation. The Chamber encourages regular exchanges with industry for input and feedback, including opportunities to beta test updated systems.
- **Streamlined path for foreign spacecraft to communicate with U.S. ground infrastructure:** Several commenters emphasized the importance of establishing a streamlined process to enable foreign spacecraft to communicate with U.S. ground infrastructure in circumstances that do not require a market access analysis, including for Telemetry, Tracking,

and Command (TT&C) communications and Earth observation data downlink. Providing an expedited pathway would formalize a process that the Commission currently permits informally through waiver requests. It would also support U.S. leadership in the provisioning of ground-station-as-a-service and space-operations-as-a-service offerings while encouraging development of U.S. satellite ground station infrastructure.

- **Regulatory certainty and precedent:** To promote regulatory certainty, explicitly carry forward settled Part 25 precedent to analogous Part 100 scenarios and publish a clear cross-walk between the two regimes.

### **Implementation: Priority Topics for Ongoing Industry Engagement**

We encourage the Commission to engage closely with industry—through established trade associations and other stakeholder groups—on: (1) requirements for satellite maneuver and ephemeris reporting, including scope, format, and protection of sensitive operational data; (2) earth station Effective Isotropic Radiated Power (EIRP) limits and associated coordination obligations; and (3) the application of financial assurance requirements, including GSO bonds, in a modernized framework. Moreover, Chamber members agree that reducing public notice periods and adopting new restrictions on informal objections and reply comments will not improve efficiency but will negatively impact stakeholder participation, transparency, and the quality of the Commission's review.

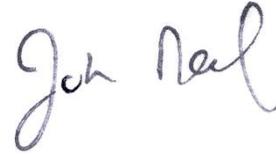
### **Conclusion**

The Chamber commends the Commission for undertaking this important modernization effort and for its focus on efficient, predictable, and internationally aligned processes. A clear and streamlined regulatory framework will support continued U.S. leadership in the space domain and enable sustained private-sector investment in next-generation space and satellite services.

The Chamber and its members stand ready to work with the Commission and its staff as this proceeding moves forward.

Respectfully submitted,

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

A handwritten signature in black ink that reads "John Neal". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.