January 20, 2026

Via ECFS

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

Re: SB Docket 25-306, *Space Modernization for the 21st Century*

The Computer and Communications Industry Association (CCIA)[1] is pleased to provide comments in response to the Federal Communications Commission (FCC or Commission) Notice of Proposed Rulemaking (NPRM) seeking to streamline space licensing.[2] CCIA commends the Commission, and particularly the Space Bureau, for taking this major step in ensuring U.S. leadership by providing a streamlined licensing structure.

I. INTRODUCTION

CCIA supports the Commission's efforts to establish "Part 100" as a replacement for existing components of the Part 25 rules, as this new framework can help facilitate the rapid development and deployment of emerging technologies. NPRM ¶168. To ensure the continued growth of the Non-Geostationary Satellite Orbit (NGSO) industry, CCIA encourages the Commission to align these new rules with International Telecommunication Union (ITU) milestone requirements. Such alignment would significantly reduce compliance burdens and support the full deployment of space assets as launch capacity expands to meet global demand. Furthermore, provided that Part 100 adopts these ITU-aligned milestones, CCIA supports the proposed surety bond formulas and extended licensing timelines. Ultimately, adopting these cohesive changes will strengthen the American space economy and directly advance the objectives of Chairman Carr's "Build America Agenda."[3]

II. CCIA RECOMMENDS THE COMMISSION MATCH ITU DEPLOYMENT MILESTONE REQUIREMENTS

CCIA recommends the Commission match the ITU's milestone requirements to ensure that NGSO systems do not lose critical spectrum access and can fully realize their operational

[1] CCIA is an international, not-for-profit trade association representing a broad cross section of communications and technology firms. For more than 50 years, CCIA has promoted open markets, open systems, and open networks. CCIA members employ more than 1.6 million workers, invest more than $100 billion in research and development, and contribute trillions of dollars in productivity to the global economy.
[2] FCC 25-69 (rel. Oct. 28, 2025), published at 90 Fed. Reg. 56338 (December 5, 2025), (the "NPRM").
[3] Chairman Brendan Carr, "A Build Agenda for America" (July 2, 2025), https://www.fcc.gov/document/chairman-carr-build-agenda-america-speech (last visited Dec. 8, 2025).

potential. NPRM ¶171. While CCIA agrees that spectrum warehousing must be prevented, launch delays remain largely outside of a licensee's control. Despite delays caused by launch unavailability or range congestion, licensees bear the full weight of regulatory consequences for missing milestones. Consequently, CCIA strongly urges the Commission to match the ITU's milestone requirements to safeguard the delivery of connectivity to millions of currently unserved people.

A. THE EXISTING LAUNCH GAP

While 65, 000 communication satellites are slated for launch over the next five years, global launch capacity remains behind satellite production.[4] Annual launch capacity must reach 15 kilotons by 2030 to meet projected demand,[5] a stark contrast to the 2025 level, which remained stagnant at a mere 3.1 kilotons.[6] Despite the entry of new commercial rockets into the market, the physical infrastructure of the U.S. federal ranges currently hinder deployment cadences. As highlighted in a 2025 Government Accountability Office (GAO) report, both Cape Canaveral and Vandenberg are experiencing "infrastructure exhaustion" that leads directly to cancelled or delayed launch windows.[7] This issue is compounded by a lack of coordination in payload processing schedules between the U.S. Space Force and commercial operators, creating significant scheduling congestion and subsequent cascading delays.[8] While there are efforts to address this launch capacity gap, it remains a critical factor that the Commission must take into account when evaluating deployment milestone requirements.

III. CCIA SUPPORTS THE COMMISSION'S PROPOSED SURETY BOND FORMULAS AND LICENSING TIMES

CCIA believes that if the Commission aligns its milestone requirements with the ITU, no major changes will be needed to the proposed surety bond structure in the NPRM. ¶¶175, 176. Under this alignment, CCIA supports the proposed surety bond formulas as they provide greater flexibility to licensees, specifically through the revision that relieves licensees of their bond obligations upon reaching 90% deployment. NPRM ¶181.

Additionally, CCIA supports the Commission's proposal to extend NGSO licensing terms to 20 years. ¶186. Although NGSO satellites typically have shorter lifespans than those in geosynchronous orbit, a long license term can accommodate the need for launching replacement stations over the life of the license. Thereby ensuring uninterrupted connectivity for the public.

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[4] Chris Daehnick, John Gang & Ilan Rozenkopf. *Space launch: Are we heading for oversupply or a shortfall?* McKinsey & Company *(*April 17, 2023), https://www.mckinsey.com/industries/aerospace-and-defense/our-insights/space-launch-are-we-heading-for-oversupply-or-a-shortfall. (Visited Dec. 18, 2025).

[5] *Id.*

[6] Jonathan McDowell, *Satellite statistics: Payloads* https://planet4589.org/space/stats/pay.html. (Visited Dec. 18, 2025).

[7] Government Accountability Office, GAO-25-107228, *National Security Space Launch: Increased Commercial Use of Ranges Underscores Need for Improved Cost Recovery* (June 30, 2025), https://www.gao.gov/products/gao-25-107228. (Visited Dec. 18, 2025).

[8] *Id.*

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CCIA appreciates the opportunity to participate in this proceeding and is available to provide any additional information that might be helpful to the Commission.

Sincerely,

Karina Perez
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CCIA