

April 15, 2026

CCIA Comments to the Office of Space Commerce on Space Commerce Certification

The following comments were shared with the Office of Space Commerce in response to a request for comment on the proposed framework for the Space Commerce Certification.

The Computer & Communications Industry Association's (CCIA) Space & Spectrum Center appreciates this opportunity to comment on the updated Mission Authorization Proposal that was released on March 24, 2026. We applaud the swiftness with which this proposal was drafted and released following the Commercial Space Competition Executive Order and the initial comments from industry. As the commercial space industry continues to evolve and expand, it is more important than ever for there to be a framework for novel space activity authorization and supervision.

Overall, we support the Office of Space Commerce's (OSC) proposed framework for a voluntary, light-touch certification framework. We believe that it will provide the right level of regulatory certainty to enable a vibrant and sustainable space economy. We recognize that the proposal is still an early draft and that the framework will continue to evolve once implemented, and we hope to be of service to OSC as you consider future changes to the framework to remain responsive to the needs of the industry. Below, we offer more specific comments and questions on the current proposal that we hope will assist OSC in further refining the proposal.

Transparency

- To the extent possible, without revealing trade secrets or classified information, OSC should publish the conditions applied to granted certifications along with the justifications for each condition. Being transparent on what conditions are being required of operators will make it easier for future applicants to design their missions to be in compliance prior to submission for certification.
- OSC should consider forming an industry advisory committee to ensure that a wide range of industry voices are considered when creating new conditions for certification. The current proposal would only consider the voice of the specific applicant and relevant government offices. While the opinion of a full advisory committee is not necessary for every specific condition on an individual license, it would be useful for conditions that are under consideration for broad use across multiple different applications.
- As applications are under consideration, OSC should implement a public comment period similar to that used for FCC applications. This ensures that a broad range of voices and concerns about specific applications are heard, which will reduce the risk of unintended damage to third parties.

Enforcement

- Currently, the main enforcement mechanism OSC has in the case of an operator violating the terms of a certificate is to revoke the certification or label the operator as being in violation. That said, other regulatory agencies are able to enact punitive measures if they condition regulatory authorization under maintaining an OSC certificate.

This could lead to an operator being liable for penalties under multiple regulatory authorities for a single infraction. Such a possibility could push operators to continue under the current regulatory process, where authorization under one agency is not tied to another's. In the cases where there is a serious enough infraction to warrant punitive measures, we encourage OSC to include a coordinated review of violations and enforcement action across regulatory agencies to prevent snowballing penalties.

Setting Conditions for Certification

- Under the proposed framework, OSC would set light-touch conditions for certification on the basis of national security, international obligations, foreign policy, and public safety. We would like clarification on how OSC determines if an action falls under one of these categories.
 - Does an operator only need to consider the safety of existing space objects when applying for certification, or will they need to account for potential future missions?
 - How will OSC consider issues such as dark and quiet skies, which do not neatly fall into the above categories?
 - How will OSC craft specific technical requirements for certificate conditions? Will OSC be consulting with standards bodies and industry groups?

Intersection with TRACSS

- As OSC crafts this certification framework, it is also working on the TRACSS program for space situational awareness. We support the efforts to create a free, publicly accessible SSA program, which will be highly beneficial for research groups, small enterprises, and international operators. As the TRACSS program approaches its full release to the public, we seek clarification on if participation in TRACSS will be a condition for certification.

Staffing

- We are concerned that implementing the proposed certification framework will require a significant increase in staff and resources at OSC. This concern is compounded by the recent budget cuts to the Office and the proposed cuts in the most recent Department of Commerce budget outlook.

International Regulatory Harmonization

- As OSC refines the certification framework, we urge OSC to continue to work with regulatory bodies in close trading partners to harmonize conditions and regulation across borders. Disparate regulatory requirements remain the top barrier to foreign markets, which in turn stifles the growth of the commercial space economy.

General Federal Regulations

- We recommend that OSC make it explicit to operators that they are expected to abide by any relevant regulatory requirements that would be applicable to the similar terrestrial activity.