November 25, 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*

Dear Secretary Dorch,

The Computer & Communications Industry Association (CCIA)[1] is pleased to provide comments in response to the Federal Communications Commission's (FCC or Commission) Further Notice of Proposed Rulemaking (FNPRM).[2] CCIA commends the Commission, and particularly the Space Bureau, for its continued work in ensuring U.S. leadership in space by providing a streamlined licensing structure. To advance U.S. leadership, CCIA urges the Commission to build operational envelopes, permit flexible non-geostationary satellite orbit (NGSO) call sign consolidation, and support space safety, ephemeris sharing, and evidence-based coexistence with radio astronomy.

I. CCIA SUPPORTS OPERATIONAL ENVELOPES

CCIA supports the Commission's objective in the FNPRM to build "operational envelopes" within Part 100 subpart C, allowing licensees to modify technical and operational parameters without seeking repetitive authorization. ¶ 6. As the satellite industry and ground infrastructure rapidly evolve, it is important to have a flexible and reliable regulatory framework that prioritizes speed, predictability, and technological neutrality. Operational envelopes can provide the flexibility necessary to keep up with technological advancements and service deployment timelines.

II. CCIA SUPPORTS CALL SIGN CONSOLIDATION

CCIA supports allowing NGSO operators to consolidate multiple authorized satellites and legacy call signs into a single NGSO satellite system under one call sign. ¶¶ 17–18. Maintaining fragmented call signs for modular, continuously replenished constellations creates unnecessary administrative overhead and complicates lifecycle management. Giving both

[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] SB Docket No. 25-306, Further Notice of Proposed Rulemaking, FCC 26-47 (rel. Jul. 23, 2026), published at 91 Fed. Reg. 67225 (Oct. 26, 2026) (the "FNPRM").

pre-existing and post-Part 100 licensees the option to merge call signs via a straightforward request, while assuring existing holders that their underlying license terms remain intact, will promote operational agility and modular system design. ¶ 18.

III. CCIA SUPPORTS EVIDENCE-BASED SAFETY STANDARDS IN EPHEMERIS SHARING AND SPACE SAFETY

A. CCIA supports the baseline ephemeris sharing cadence encouraged in the accompanying Order

CCIA supports the baseline ephemeris sharing of every eight hours for satellites operating in Low Earth Orbit (LEO) and every 24 hours for satellites operating above LEO. ¶ 34. If the Commission later determines that a faster baseline reporting cadence is warranted, any such requirement should be phased in gradually to account for varying technical and operational capabilities across operators. Furthermore, to ensure global interoperability and avoid rigid regulatory constraints, the Commission should rely on internationally recognized data formats, such as Consultative Committee for Space Data Systems (CCSDS) standards and refrain from imposing prescriptive forecast horizons. While operators should share ephemeris data as frequently as necessary to support accurate conjunction risk assessments, the cadence should always be based on clear data that supports safety and efficiency.

With respect to specialized orbital activities, CCIA supports requiring operators engaged in rendezvous and proximity operations (RPO) to notify the Commission prior to commencing such operations. ¶ 34. Requiring advance notice can enable satellite operators and space situation awareness (SSA) providers to anticipate RPO maneuvers and coordinate effectively ahead of potential close approaches.

B. CCIA supports establishing a process for the Space Bureau to certify qualified private ephemeris tracking systems and SSA providers

CCIA supports establishing a process for the Space Bureau to certify qualified private ephemeris tracking systems and SSA providers as a compliant means of satisfying the Commission's ephemeris-sharing rules, supplementary to a free basic SSA service provided by the U.S. government. ¶ 35. As the Space Bureau looks to establish a process to certify private ephemeris tracking systems and SSA providers, it should adopt performance-based criteria focused on system reliability, data quality, and interoperability. These criteria should be developed collaboratively by U.S. government agencies possessing the relevant technical expertise alongside industry stakeholders. A multi-provider certification model promotes innovation and competition in SSA services, while providing additional data for future operations. Additionally, to ensure space safety data is not fragmented across multiple platforms, the Commission must ensure there is a good sharing mechanism between U.S. government-operated and privately operated systems.

C. CCIA supports establishing consistent space safety reporting requirements across all NGSO operators

CCIA believes that requiring space safety reporting across all NGSO operators will help avoid disposal failures and collision avoidance outages. ¶ 36. To avoid unnecessary administrative burdens, the Commission should keep the reporting format flexible and allow operators that are currently subject to license-specific reporting conditions to satisfy those obligations by simply complying with the new uniform rule. Additionally, the Commission should encourage operators to coordinate directly with SSA providers so that debris-generating anomalies, such as on-orbit fragmentations, are documented and shared rapidly.

IV. CCIA SUPPORTS MODERN, EVIDENCE-BASED COEXISTENCE WITH RADIO ASTRONOMY

CCIA supports protecting radio astronomy operations from harmful interference. ¶ 75. However, regulatory restrictions must reflect currently active facilities, demonstrated interference risks, and modern satellite capabilities. Outdated or disproportionate mandates restrict satellite coverage, reduce network capacity, hinder efficient spectrum utilization, and curtail operational flexibility without demonstrably delivering additional benefits for radio astronomy. To establish a balanced, bright-line coexistence framework in Part 100, the Commission should consider the following:

- Protection Levels Must Reflect Demonstrated Interference Risks: The Commission should reevaluate existing power flux-density (PFD) and emissions limits against modern satellite architectures and active mitigation capabilities. Any technical restrictions should be based on empirical evidence and tailored so they do not disproportionately impact operators' efficiency while protecting radio astronomy operations from harmful interference.
- Geographic Protection Zones Must Be Updated: Static 160-km and 50-km exclusion radii should be replaced with realistic, band-specific geographic contours. Outside of these contours, satellite and earth station operators should face no additional radio astronomy-specific restrictions or coordination mandates.
- Modern Technology Enables Less Restrictive Coexistence: Within a geographic contour, operators should have the flexibility either to coordinate directly with the observatory or to demonstrate protection using advanced technical mitigations such as geofencing, beam steering, dynamic frequency management, or operational data sharing. Additionally, a single, system-wide technical showing should suffice rather than requiring separate, repetitive showings for each individual site or frequency band.
- Protections Must Follow Established Spectrum Rights: Radio astronomy observations conducted outside of frequency bands allocated or otherwise protected for the radio astronomy service should not generate additional restrictions on authorized satellite operations in adjacent or other bands without empirical research of harmful interference. Part 100 rules must respect existing spectrum allocations and regulatory rights rather than expanding protections implicitly.

Ultimately, coordination must facilitate coexistence and not serve as a licensing veto. The Commission should not condition a satellite license grant on completed negotiations with radio

astronomy stakeholders or impose new pre-operational approval hurdles where existing technical rules and demonstrated mitigation techniques address interference risks.

V. CONCLUSION

By adopting operating envelopes, call sign consolidation, performance-based space safety standards, and updating radio astronomy protections to reflect modern technologies and mitigation strategies, the Commission can strengthen orbital sustainability while preserving the operational efficiency needed for U.S. commercial space leadership.

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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,

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