June 26, 2025

The Honorable Jerry Moran
U.S. Senate Committee on Appropriations
Commerce, Justice, Science, and
Related Agencies
S-128, The Capitol
Washington, D.C. 20510

The Honorable Chris Van Hollen
U.S. Senate Committee on Appropriations
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S-128, The Capitol
Washington, D.C. 20510

Dear Chairman Moran and Ranking Member Van Hollen:

We write to you today on behalf of our more than 150 member companies and 30,000 aerospace employees working in America's thriving commercial space industry. Our members represent multiple sectors of the space economy including satellite operators, low-Earth orbit research and manufacturing, and commercial space situational awareness providers. As you know, maintaining access to space is critical to U.S. national security, scientific discovery, and economic growth. As activity in space grows, so do services provided by space-based assets that are increasingly a part of everyday life for many Americans. Given our reliance on a sustainable space domain, the space industry is extremely concerned by reports that the Fiscal Year 2026 budget requests no funding for the Department of Commerce's Office of Space Commerce (OSC) to provide Space Traffic Coordination (STC) services; OSC is currently developing and building the Traffic Coordination System for Space (TraCSS) program for this purpose.

TraCSS is already providing U.S. government-supported basic Space Situational Awareness (SSA) data and services to a small group of beta users and is continuously expanding. While this service has long been performed by the Department of Defense (DoD), this function was appropriately transferred to the Office of Space Commerce (OSC) by Space Policy Directive-3. A 2020 report from the National Academy of Public Administration also recommended OSC as the best federal agency to undertake public SSA services, with the report noting that OSC's "operating plan to move forward is not defined by a vision to build a large bureaucratic structure, but rather is intended to set about its organizational development following a collaborative model that places the highest priority on serving as a trusted convener, coordinator, and provider of respected leadership for the larger domestic and international community."[1] OSC has received appropriations for SSA activity for several years.

Industry believes that maintaining a basic SSA service at no cost to the end user is inherently a government function that benefits both government and private space activities. OSC is the right agency to manage this function, given their relationships and experience with

[1] https://s3.us-west-2.amazonaws.com/napa-2021/studies/united-states-department-of-commerce-office-of-space-commerce/NAPA_OSC_Final_Report.pdf

commercial space operators and their statutory mandate to "foster the conditions for the economic growth and technological advancement of the United States space commerce industry" (51 USC 50702). Maintaining this function at OSC is also critical for U.S. leadership and ongoing international discussions on space sustainability, and the implications of those discussions for U.S. operators. Furthermore, cancelling public facing STC functions at OSC means this function would likely revert back to DoD, re-introducing a non-core mission to an already overloaded workforce and distract from their core national security space concerns in an increasing threat regime. This outcome is not in the best interest of the government or space operators given issues with timeliness and fidelity of the existing DoD conjunction notification regime.

There are reforms that could be made to the TraCSS/STC program to adjust the effort, in line with OSC's original vision of a small government footprint and partnering with commercial entities to outsource capabilities and services. There may be no need for a new SSA command center or additional studies that admire the problem. OSC can improve DoD's legacy SSA capabilities with respect to accuracy and timeliness by purchasing and validating commercial SSA data and leveraging commercial processing and fusion software to integrate source data - U.S. government, commercial, operator-provided, international - to generate the necessary high accuracy, low latency SSA to support STC. Once OSC has a proven minimum viable product, commercial SSA providers can continue to work closely with satellite operators to understand their needs and continually improve upon the system. All of this does require continuous U.S. government investment, but the returning to the old paradigm will set back a capability and likely result in loss of service for safe operations in space that is affecting all operators.

Thank you for your consideration.

Sincerely,

Dave Cavossa
President
Commercial Space Federation

Clay Mowry
CEO
American Institute of Aeronautics and Astronautics