



September 5, 2025

The Honorable Howard Lutnick  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

Dear Secretary Lutnick,

On behalf of the Commercial Space Federation (CSF), the leading trade association for the U.S. commercial space industry, thank you for your continued support of policies that will cut red tape and bolster U.S. competitiveness and leadership in space. As evidenced by the recent executive order, “Enabling Competition in the Commercial Space Industry,” it is clear that this administration and leaders across the federal agencies understand the critical role of commercial space capabilities to the U.S. economy, national security, and civil space exploration.

Section 5 of the executive order, “Reforming Novel Space Activity Authorization,” directs the Department of Commerce (DOC) to propose a process for authorizing non-governmental space activities not governed by existing regulatory frameworks, consistent with the 2020 National Space Policy. CSF strongly agrees with the EO’s direction that any new framework must be guided by the “goal of expediting and streamlining authorizations to enable American space competitiveness and superiority.” Accordingly, CSF respectfully submits the following recommendations for your consideration as you evaluate how to implement this directive.

The mission authorization process should be voluntary for industry and rooted in the Department’s existing promotional authority.<sup>1</sup> Consistent with the spirit of the EO to minimize regulatory burdens, DOC would confirm through this voluntary process that a proposed activity complies with U.S. law and U.S. treaty obligations. This would ensure that companies, particularly startups, can receive a seal of approval—if they choose to seek one— from the U.S. Government for their activities in space, facilitating investment and global competitiveness, directly aligned with the Department’s broader objectives for the U.S. economy. It will be helpful for Congress to codify DOC as the department responsible for this activity, to ensure continuity across administrations and needed resources, but DOC should not wait for such direction from Congress.

The mission authorization process should have the following characteristics:

- **Presumption of Authorization:** An application should be deemed authorized unless explicit violations of U.S law or U.S. treaty obligations are identified and communicated to the applicant, utilizing appropriate security measures as needed. An explicit deadline should

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<sup>1</sup> 15 U.S.C. § 1512.

be set for the timely review of all applications. If no response is received by the applicant prior to the expiration of such a deadline, the activity should be deemed authorized. Once a mission is authorized, that mission should continue to be authorized to conduct the approved activities unless significant changes to the mission parameters are planned. DOC should articulate and document examples of what constitutes a significant change.

- **Light Touch:** Authorizations should require limited data from an applicant; any limitations on operations should only relate to explicit violations of U.S. law and applicable international treaties. This process must not replicate, duplicate, or otherwise insert the Department into regulatory authorities performed by other agencies. The commercial space industry is already highly regulated by the Federal Aviation Administration (FAA), Federal Communications Commission (FCC), National Oceanic and Atmospheric Administration (NOAA), among others.
- **Predictable, Transparent, Responsive, Repeatable:** DOC should establish clear, stable requirements, consistency in review processes, and strict timelines for authorizing an activity. There must be timely and detailed communications between an applicant and DOC and the ability to track the status of an application. DOC should act as an ombudsman to support questions and resolution of any issues between the applicant and the relevant U.S. government entities. Additionally, the mission authorization process should provide the applicant with an opportunity to cure any issues raised with the proposed activity within a set timeframe. During the cure period, if classified information or communications are at issue, the mission authorization applicant should be provided with an opportunity to review such information or communications if they have personnel with the appropriate clearance status. Information (with the exception of proprietary data) on approved applications should be posted publicly to ensure consistency by the government and establish precedent that industry can leverage.
- **Clear authority:** DOC must maintain exclusive decision authority. While the Department may consult other Federal agencies, the Secretary should retain unilateral authority to approve or deny an application under this voluntary regime.

As DOC implements this new authorization regime, CSF recommends that the Department clearly establish points of contact to facilitate discussions with industry. Eventually, DOC should develop an electronic application portal, utilizing commercial off the shelf products to the greatest extent possible, to allow for internal and external tracking of an electronic application for mission authorization. This portal could eventually be used to input data required for all U.S. government licensing activities, including those conducted by other federal agencies.

DOC should clarify the kinds of space activities authorized under this new regime. In 2020, consistent with statutory obligations, DOC published new regulations governing the license of commercial remote sensing systems (CRSRA). These updated regulations are providing a predictable pathway to operations for the U.S. remote sensing industry. DOC completes license reviews within 12 days on average—a success borne of the first Trump



Administration's efforts to cut regulatory burden. CSF respectfully requests that DOC maintain CRSRA as a pathway to a license for remote sensing activities, separate from the novel space activities regime, and ensure remote sensing licensing remains a part of the Office of Space Commerce, functioning as it is today. In addition, section 5 of the executive order states "nothing in this section shall be construed to apply to human spaceflight." CSF recommends that DOC authorize space activities like commercial space stations and the commercial operations that they will enable, but not implement requirements related to human safety.

Finally, leveraging its promotional authority, the Department should lead an interagency review of existing regulations applying to the commercial space industry and issue recommendations for how to further harmonize and streamline federal oversight of commercial space activities. DOC should strive to prevent duplication in the provision of information by space companies for mission authorization and other licenses and regulatory approvals.

Thank you for your consideration. This trailblazing Executive Order is a substantial step forward relative to an issue that has languished for decades, and the CSF applauds the focus and support that the White House and DOC are providing to commercial space development. CSF looks forward to continuing to work with the administration to advance partnerships in the global space economy.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Cavossa". The signature is fluid and cursive, with a large initial "D" and a stylized "Cavossa".

Dave Cavossa  
President  
Commercial Space Federation