



September 9, 2026

Hon. Taylor Jordan
Director, Office of Space Commerce
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

Dear Assistant Secretary Jordan:

The Commercial Space Federation (CSF), the premier trade association representing the American commercial space industry, thanks the U.S. Department of Commerce and Office of Space Commerce (OSC) for their continued leadership in promoting the American space industry. To further bolster U.S. competitiveness and grow the commercial remote sensing sector, CSF respectfully requests that OSC streamline the implementation of private remote sensing licensing and commence a rulemaking proposing reforms to the Commercial Remote Sensing Regulatory Affairs (CRSRA) division's licensing of private U.S. remote sensing space systems.

American remote sensing companies continue to lead the world in innovation, and the remote sensing data provided by U.S. Earth observation satellite operators is critical to the furtherance of national security and economic development. The revised remote sensing regulations revisions issued under the first Trump administration in 2020 were welcomed by industry and represent a laudable government effort to reform and streamline regulatory requirements to better allow for the development and growth of the commercial remote sensing industry. These reforms have largely supported continued growth and innovation in the industry while increasing the efficiency of the remote sensing licensing process. However, American innovation has now outpaced the 2020 framework, and it is time that OSC and industry work together to reconsider of how U.S. policy, licensing frameworks, and regulatory requirements can best position the U.S. industry to succeed in a competitive international remote sensing marketplace. OSC can best support further industry innovation by minimizing bureaucracy, resolving regulatory obstacles including the current tiering structure and overbroad application of shutter control conditions, and creating and expanding commercial data acquisition opportunities.

CSF members stand ready to support a thorough rulemaking process that proposes reforms to the CRSRA licensing framework and associated regulatory requirements. In doing so, CSF respectfully requests that CRSRA consider the following actions in any proposed rulemaking.

1. Modernizing remote sensing licensing to support American competitiveness.

Modernize the structure of remote sensing licensing through a full review of the tiering system by: (A) identifying whether there are aspects of the tiered licensing framework that could be simplified or streamlined to better reflect the current remote sensing landscape, (B) reviewing

whether the current system is working or is instead disadvantaging U.S. companies relative to their foreign competitors, and (C) how a revised structure could be implemented to increase competitiveness and innovation.

2. Providing greater transparency and regulatory certainty.

Increase transparency through requirements that CRSRA regularly publish: (A) summaries of licensing decisions and underlying rationale (on an anonymized basis), (B) application templates, (C) guidance documents, and (D) other items that further regulatory certainty for operators.

3. Ensuring a streamlined transition to new framework.

Require that CRSRA identify the implementation procedures it will follow when adopting new guidance, revised application requirements, or regulatory changes. CRSRA should also provide advance notice of material policy or interpretive changes and establish a standard implementation grace period (e.g., 180 days) for any new or modified guidance, templates, or interpretive changes, ensuring that good-faith operations and pending applications are afforded a safe harbor during the transition. CRSRA should also consider whether existing licensees should automatically receive the benefit of any relaxed conditions or revised tier criteria without the need to re-apply and periodically review or sunset outdated or obsolete license conditions.

4. Clarifying the application of CRSRA's jurisdiction and licensing regulations in the context of multi-jurisdictional missions.

5. Streamlining compliance and enforcement.

Reduce overly broad compliance and enforcement and identify aspects of the current compliance and enforcement framework that create uncertainty or unnecessary burden for licensees and establish clear guidance on what changes to licensed systems warrant prior approval, license modification, or notification, and what factors distinguish substantive changes from routine operational or administrative changes.

6. Standardizing license application completeness standards.

Establish objective, published license application completeness standards and limit further inquiries strictly to information required by the regulations and license application guidelines.

7. Modernizing treatment of license conditions.

Standardize specialized conditions across like constellations (such as those for cyber security), minimize duplication with other Federal cybersecurity requirements, and ground them in industry standards and best practices.

8. Maintaining a waiver process as is currently available.

9. Limiting onerous restrictions that can be broadly implemented.

Restrictions that impact competitiveness should be clear, specific, and targeted to minimize impacts on business.

10. Establishing CRSRA performance metrics.

Define CRSRA performance metrics and benchmarks and require the annual publication of performance statistics.

11. Clarifying CRSRA evaluation of foreign commercial remote sensing capabilities.

Identify how CRSRA evaluates foreign commercial remote sensing capabilities when making licensing decisions and which information sources, methodologies, or processes would improve the accuracy, consistency, and transparency of foreign availability assessments.

12. Clarifying definitions as applied to non-imaging pathologies.

Examine whether the definitions of “remote sensing space system,” “unenhanced data,” and “available” are sufficiently clear as applied to non-imaging phenomenologies such as GNSS radio occultation, passive microwave sounding, RF signal collection and geolocation, short-range signal detection, and lightning and space-weather sensing and clarify, by rule or guidance, which phenomenologies fall outside the scope of the Act or are appropriate for a notification-only or streamlined pathway, and clarify to what extent non-Earth imaging falls within the scope of the Act.

13. Ensuring that any resulting reforms are aligned with and not duplicative to OSC’s Space Commerce Certification or any other Federal regulations.

CSF also notes that there are many changes that CRSRA and OSC could implement immediately, without a change to the regulations, that would significantly improve the process and increase U.S. remote sensing competitiveness in the near term. In particular, CSF recommends that OSC and CRSRA consider whether all or aspects of the proposals laid out above, particularly in numbers 2-8 and 11, can be implemented even before rule updates are adopted.

Thank you for your consideration of this request for OSC to initiate administrative improvements for CRSRA licensing along with a rulemaking proposing reforms to the CRSRA licensing framework and associated regulations. CSF looks forward to continuing to work with OSC to ensure continued American space superiority.

Sincerely,



Dave Cavossa
President
Commercial Space Federation