



June 7, 2017

The Honorable Lamar Smith  
Chairman  
House Committee on Science, Space, and  
Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

The Honorable Edie Bernice Johnson  
Ranking Member  
House Committee on Science, Space, and  
Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

The Honorable Brian Babin  
Chairman  
Subcommittee on Space  
House Committee on Science, Space, and  
Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

The Honorable Ami Bera  
Ranking Member  
Subcommittee on Space  
House Committee on Science, Space, and  
Technology  
2321 Rayburn House Office Building  
Washington, DC 20515

Re: American Space Commerce Free Enterprise Act of 2017

Dear Chairman Smith, Ranking Member Johnson, Chairman Babin and Ranking Member Bera,

The Satellite Industry Association<sup>1</sup> (SIA) respectfully requests this letter be entered into the record for the full committee mark-up of the American Space Commerce Free Enterprise Act of 2017 on June 8, 2017 with relevance to Chapter 802 – Permitting of Space-Based Remote Sensing Systems<sup>2</sup>.

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<sup>1</sup> SIA Executive Members include: The Boeing Company; AT&T Services, Inc.; EchoStar Corporation; Intelsat S.A.; Iridium Communications Inc.; Kratos Defense & Security Solutions; Ligado Networks; Lockheed Martin Corporation; Northrop Grumman Corporation; OneWeb; SES Americom, Inc.; Space Exploration Technologies Corp.; SSL; and ViaSat, Inc. SIA Associate Members include: ABS US Corp.; Artel, LLC; Blue Origin; DataPath, Inc; DigitalGlobe Inc.; DRS Technologies, Inc.; Eutelsat America Corp.; Global Eagle Entertainment; Glowlink Communications Technology, Inc.; Hughes; Inmarsat, Inc.; Kymeta Corporation; L-3 Electron Technologies, Inc.; O3b Limited; Panasonic Avionics Corporation; Planet; Semper Fortis Solutions; Spire Global Inc.; TeleCommunication Systems, Inc.; Telesat Canada; TrustComm, Inc.; Ultisat, Inc.; and XTAR, LLC.

<sup>2</sup> This letter reflects comments of SIA to section 802 only. SIA and its members may have additional views on the legislation to be provided separately. SIA also recognizes and agrees

The United States is clearly a leader in commercial satellite remote sensing in terms of technology, innovation, bringing new capabilities to market, and leveraging remote sensing data to solve challenging problems. However, regulating it requires a fundamental shift in approach as commercial remote sensing platforms evolve into digital information services in a more competitive international landscape. This shift in regulation must ensure greater predictability, transparency, and accountability for the U.S. commercial remote sensing industry to thrive.

On May 12<sup>th</sup>, 2017, SIA sent a letter to Chairman Babin and Ranking Member Bera thanking them for their support of the satellite industry and a productive round table discussion on March 15<sup>th</sup>, 2017 that addressed the needs, challenges, and opportunities for reforming the U.S. commercial remote sensing regulatory regime. SIA outlined further specifics that would help to achieve this fundamental shift in regulating the industry and we are pleased to see many of those elements incorporated into the draft legislation.

In particular, we support much of the draft legislation addressing commercial remote sensing, and its general goals:

- Recognizing that the commercial remote sensing industry brings benefit to security and economic growth;
- Clarifying that technology not capable of imaging the earth is not subject to licensing requirements;
- Reorganizing the commercial remote sensing regulatory responsibilities within the Department of Commerce to a level commensurate with the importance and potential of this sector for the United States;
- Introducing regulatory transparency for stakeholders;
- Eliminating the possibility of de facto vetoes of a pending application;
- Giving clear authority to Department of Commerce to consult, as necessary, with other Departments and Agencies;
- Establishing a decreased review time with a presumption of approval for license applications to be more responsive to business opportunities, and, further, assures that the Department of Commerce can be held accountable to congressionally-established review periods for license applications; and
- Prohibiting the Department of Commerce from instituting retroactive changes to operational licenses that have immediate and irreversibly negative impact on

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with the exemption of this legislation of commercial space stations licensed by the Federal Communications Commission.

established, and/or long-standing technical and business operations of licensees, especially when or if other methods are available to the United States government to achieve the same ends to protect national security.

SIA strongly supports these goals addressed in the draft legislation; we applaud the sponsors of this bill and the Committee's leadership for their efforts to date to advance reform of the commercial remote sensing regulatory regime. SIA believes that introducing greater transparency and discipline into the U.S. Government's regulatory review processes will ultimately encourage industry growth and bring a multitude of benefits to the U.S. economy and security.

Sincerely,

/s/  
Tom Stroup  
President  
Satellite Industry Association