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Request for Comment
In-Space Servicing, Assembly, and
Manufacturing National Strategy

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The Aerospace Industries Association (AIA) represents over 300 companies and nearly 2 million U.S. workers across the aerospace industry, including several companies currently engaged in ISAM-related businesses and leading the development of ISAM capabilities.

Thank you for the opportunity to comment on the implementation of the In-Space Servicing, Assembly, and Manufacturing National Strategy. AIA provides the following recommendations to support the implementation of the strategy.

1. Budget requests to support implementation. Implementation of the strategy will require corresponding budget support in the President's FY2024 budget and beyond. Absent specific funding, ISAM interagency-driven activity may be considered an "unfunded mandate" by agency participants, resulting in more limited resources and support at the agency and program level. Additional ISAM strategy-driven activities should include corresponding new funding, and not pull resources from existing United States Government (USG) ISAM efforts - for example, existing ISAM programs within NASA's space technology mission directorate.

2. Industry communication and partnerships. Implementation should include ongoing industry partnerships and communication at the interagency, agency, and program levels. AIA commends OSTP for taking this approach here. Communication serves at least two distinct purposes for implementation: First, it will benefit USG to understand the current and developing industry ISAM capabilities, and where USG needs may be met by industry in the near term. Second, ongoing communication will help USG define needed support to develop additional or enhanced capabilities, such as a specific NASA space technology "tipping point" solicitation to advance US industry innovation.

3. Regulatory and policy coordination. ISAM businesses present cases of first impression to some existing regulatory regimes and may require the development or further refinement of policies in other areas. Relevant policy areas include spectrum use and allocation, in-space authority, space situational awareness, and space traffic coordination. This should also include enhanced regulatory and licensing clarity for the continued supervision of commercial US ISAM service providers. OSTP, working with the National Space Council, should support interagency efforts to provide regulatory or policy alignment and clarity for ISAM activities.

4. Prioritize sustained R&D investment and procurement. Implementation should prioritize the investment and procurement of commercial ISAM capabilities to establish a robust demand signal. For example, investment and procurement could be specifically focused on facilitating the advancement of Administration priorities such as space sustainability. Additional concepts

could include an active debris removal demonstration program to advance removal of large, high-risk debris facilitating the advancement of many enabling ISAM technologies.

Thank you again, and we welcome the opportunity to comment and discuss further.

Sincerely,

A handwritten signature in black ink that reads "Michael J. French". The signature is written in a cursive style with a large initial "M".

Mike French
Vice President, Space Systems