



May 25, 2023

Katie Thomson
Chief of Staff
Federal Aviation Administration
800 Independence Avenue SW
Washington, DC 20591

Dear Katie,

Thank you for meeting with the Aerospace Industry Association's space launch community to discuss the FAA's *Notice of Updated Factors for Optimizing Use of the National Airspace System*. With over 320 member companies engaged across all uses of the national airspace, from commercial aviation, defense, and space, to emerging autonomous air mobility activities, the FAA is a key partner and critical to the continued success of America's aerospace industry. We greatly appreciate your consideration of the space industry's perspective on the recent *Notice* and the FAA's continued collaboration on national airspace coordination developments.

We welcome the spirit of transparency behind the FAA's release of the *Notice*, and urge continued transparency, flexibility, and collaboration in the refinement and implementation of the factors. In particular, AIA:

- Supports the continued use of the Space Collaborative Decision-making (CDM) process as a forum for addressing concerns and further refine the factors before convening a new Advisory Rulemaking Committee (ARC);
- Supports FAA implementing the recommendation of the FAA's 2019 Airspace Access Priorities ARC to expand ATC access to the FAA's Space Data Integrator (SDI) as soon as possible. SDI, which became operational in 2021, displays near real-time telemetry data on rocket status and location. However, these data are only available at the FAA Command Center in Warrenton, VA, meaning that even when airspace is quickly reopened, it takes additional time for this information to be manually distributed to air traffic controllers in the field, which can delay aircraft passage through reopened airspace. It is our understanding that the FAA does not intend to begin notional development work on this task until at least 2028, with completion no earlier than 2033—11 years after the ARC's recommended implementation deadline of 2022;
- Supports the development of more precise daytime analysis of peak air traffic windows versus a default presumption toward nighttime launches;
- Appreciates the clarification that the *Notice* prioritizes commercially licensed national security and other national interest launches and supports the FAA specifying this also includes NASA commercially licensed launches and critical test launches; and
- Further appreciates the FAA's consideration of limitations in the ability to shift certain launch windows due to the physics constraints of delivering payloads to certain destinations.



We look forward to continuing to work with you and the FAA on the critical importance of national airspace integration to ensure U.S. aerospace innovation across the airspace and beyond.

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
Aerospace Industries Association