



AIA Mission Authorization and Supervision Principles December 2023

The Aerospace Industries Association (AIA) represents over 320 companies and over 2.2 million U.S. workers across the aerospace and defense supply chain. Our members design, manufacture, and operate ground systems, launch vehicles, and spacecraft for commercial, civil, and national security space missions. Our members include global leaders in researching, developing, and operating novel space systems, including human space habitats and in-space servicing, assembly, and manufacturing capabilities. AIA supports the establishment of a transparent process to satisfy the United States' mission authorization and continuing supervision requirement following the principles below.

- **Public Review and Comment** – Given the novel and evolving nature of space activities that may require mission authorization, new processes could create unintended consequences or disrupt incentives that have enabled U.S. leadership in these capabilities. Review and comment on any proposed framework will minimize these negative outcomes and should be required before any new process is implemented.
- **Technical Support Approach** – The framework and authorizing authority should be established and incentivized with a “technical support” approach. Submitters should be provided an individual point of contact tasked with guiding the submitter from submission to authorization. This individual should be incentivized to provide timely, transparent communication with submitters on the status of their submission and the steps required toward authorization. Submitters should be provided with a concise roadmap of the process and requirements from submission to authorization. Submissions should be able to be completed electronically, and submitters able to view the status of their submissions via electronic platform.
- **Presumption of Authorization** – Given the varied and novel nature of activities that have and may require mission authorization coupled with the U.S.'s strong interest in maintaining novel space activity innovation and leadership, submissions should be provided with the presumption of authorization in any proposed process. Under this presumption, the U.S. government would be required to justify a mission authorization denial or delay, following the additional principles below.
- **60-Day Authorization Timeline** – Similar to the NOAA Commercial Remote Sensing regime, the U.S. government should have no more than 60 days from submission to determine authorization. At the expiration of 60 days with no U.S. government action, the activity should be deemed authorized.
- **Under Secretary Required Timeline Waiver** – Should the U.S. government require an extension of the 60-day timeline, a limited extension should be provided (e.g., no more than 15 days) only with approval at the Under Secretary level of the authorizing Department. This reflects the importance of the 60-day timeline and ensconces that extensions should be rare.
- **Transparency** – The authorization process should be guided by transparency between the submitter and the U.S. government. Should a U.S. government agency in the interagency process



have a concern with a submission, that concern should be raised as soon as identified to the submitter. This should include providing the concern, the agency raising the concern, and a point of contact to directly discuss the concern.

- **Existing Authorities** – The mission authorization process should be explicitly and appropriately tailored for its purpose to implement the Nation’s obligations under Article VI of the Outer Space Treaty. The mission authorization process should not be or become duplicative of processes already established in law, including processes to carry out existing authorities for launch and reentry licensing and permitting, spectrum use licensing, and remote sensing licensing.
- **No Additional Information Required** – Submissions should not require additional information beyond what is already required under preexisting U.S. government space activity licensing processes. Across FCC, FAA, and NOAA required licensing processes, companies are required to provide a vast array of information on mission specifications and plans. This information should be sufficient to accomplish the mission authorization. If the U.S. government determines additional information is required for the authorization process, the additional information sought and its justification should be put out for public review and comment under the signature of the head of the authorizing Department.
- **Mission-Level Authorization** – Authorizations should apply to all activities reasonably assumed for the entire scope of a mission and applications not required for each mission component. For example, a satellite servicing vehicle should be authorized for the scope of servicing activities and not require individual authorizations before each servicing activity.
- **Protect Proprietary Information** – Under the NOAA remote sensing licensing process, NOAA has an obligation to keep confidential, proprietary information submitted by licensees or potential licensees. Documents considered business confidential or proprietary information may include foreign agreements and supporting documentation explicitly designated and marked as business confidential or proprietary by the applicant. The mission authorization process should contain similar safeguards for submitters or potential submitters.
- **Continued Validity of Existing and Pending Authorizations** – The U.S. government has provided mission authorization to existing and planned space operations. Additional operations may also be in the process of being considered under existing processes at the time a new framework is established. Any updated process should not impact the validity of existing mission authorizations. Moreover, submissions currently under process at the time a new process is established should not be delayed and should be allowed to continue under preexisting processes if the submitter desires.