



Space Commerce Certification Proposal Industry Feedback

Executive Summary

The Aerospace Industries Association (AIA), representing more than 300 aerospace and defense companies and over two million American workers, supports the Department of Commerce's newly proposed framework for authorizing novel commercial space activities, and the Consortium for Execution of Rendezvous and Servicing Operations (CONFERS), a global industry consortium focused on advancing in space servicing, joins in supporting this effort. This policy marks a significant step toward strengthening U.S. leadership in the rapidly evolving global space economy.

Tasked with developing a streamlined, light-touch approach for mission authorization, the U.S. Department of Commerce's Office of Space Commerce (OSC) has established a long-awaited pathway for emerging space capabilities, including in-space servicing, assembly, and manufacturing (ISAM); active debris removal (ADR); space nuclear power; lunar infrastructure; and other next-generation commercial missions.

The Space Commerce Certification approach promises significant economic benefits for U.S. companies, fostering faster deployment of cutting-edge technologies, lowering regulatory uncertainty, and enabling the commercial sector to attract investment, accelerate innovation, and compete more effectively on the global stage. Ensuring clarity, predictability, and appropriate scope in implementation will be critical to realizing these benefits.

AIA and CONFERS applaud the administration for recognizing the urgency of enabling these activities and for signaling the U.S. commitment to maintaining technological advantage in low-Earth orbit and beyond.

To fully align with industry needs, AIA and CONFERS recommend strengthening interagency accountability, clarifying guardrails against regulatory creep, and reinforcing predictability and safety to support long-term investment in the following ways:

Define Certification's Scope and Role in Interagency Decision-Making

While we strongly support the direction of the proposal, additional detail on implementation, including timelines, reviewing agencies, decision authority, and compliance expectations, particularly as they relate to interagency coordination and review timelines, will be important to

fully assess its effectiveness and ensure it provides the level of regulatory certainty needed by industry.

While the proposal establishes a centralized entry point, it does not yet function as a fully integrated one stop shop. The effectiveness of the framework will depend on clear accountability, defined timelines, and consistent interagency alignment to avoid delays or fragmented outcomes.

The framework should further establish clear interagency accountability, including identification of a single decision authority and defined processes for resolving interagency disagreements, to avoid delays and uncertainty in application outcomes.

Additional clarity on the scope of “novel activities” would further improve predictability. This includes defining eligibility criteria and ensuring that activities already subject to existing regulatory regimes are not inadvertently captured in overlapping review processes.

Avoid Duplicative Reviews and Inconsistent Agency Conditions

Additional clarity is needed to ensure that certification does not introduce duplicative review or inconsistent conditions across agencies. The framework should clearly define whether certification outcomes are advisory, supplemental, or determinative in interagency decision making, and should clarify the sequencing of certification relative to existing licensing processes to avoid uncertainty in timing and dependencies.

The voluntary nature of the framework also raises questions regarding how consistently certification will be recognized and relied upon across agencies and stakeholders. Greater clarity on how certification outcomes will be applied in practice will be important to ensuring the framework provides meaningful regulatory certainty.

Preserve Orbital Debris Mitigation and Responsible Operations Practices

This framework underscores the vital role of safety, responsible operations, and continuous supervision, which are essential to ensuring long term sustainability of the space environment. By providing clearer expectations and predictable reviews, the policy has the potential to reduce operational risk, improve mission planning, and strengthen public trust in the safety of commercial space activities. To support these objectives, the framework should also ensure that requirements remain narrowly tailored and do not expand over time beyond the intended scope of a light touch, risk-based approach. The framework should also ensure that existing orbital debris mitigation and responsible operations practices are maintained and not diminished through implementation.

Protect Proprietary and Operational Data and Accommodate Dynamic Operations

Given that certification may require submission of detailed mission and operational information, it is important to establish strong protections for proprietary and operationally sensitive data. This

includes limiting redistribution of applicant information and ensuring that only information necessary to assess statutory interests is required.

The framework should also account for dynamic and multi mission operations, including activities involving rendezvous and proximity operations and servicing architectures that may evolve over time. Requirements should avoid assumptions based on static or single purpose spacecraft.

The Space Commerce Certification proposal represents a strong step forward in implementing industry principles of speed, risk-based oversight, and regulatory coordination. We look forward to continued engagement as OSC refines implementation details, including interagency coordination practices, data-protection protocols, and how the certification process will interface with existing licensing, procurement, and acquisition regimes.