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COSMIC

CONSORTIUM FOR SPACE MOBILITY AND ISAM CAPABILITIES

POLICY AND REGULATION

U.S. ISAM REGULATORY REPOSITORY

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REVISION AND HISTORY PAGE

Revision No.	Description	Release Date
Baseline	Initial Baseline	06/25/2024
Rev B	Relevant new entries added as appropriate; minor wording updates throughout	01/15/2025
Rev C	Clarifies which items in the international section are binding and which are non-binding, adds newly issued export control rules, adds legislation introduced into the 119th Congress, updates the status of legislation introduced during the 118th Congress, updates ongoing rulemaking proceedings, adds newly initiated rulemakings on NGSO/GSO spectrum sharing, foreign ownership, and satellite broadband, divides proposed legislation and proposed regulations into separate sections, and makes non-substantive editorial changes.	09/08/2025

Contents

1. Introduction

This document provides COSMIC members a list of laws, regulations, policies, and definitions relevant to in-space servicing, assembly, and manufacturing (ISAM). Guidance documents, policy statements, and white papers also appear. Each item is briefly summarized and accompanied by a link to the relevant materials or websites. This document will be updated quarterly by the Policy & Regulation Focus Area.

2. International Treaties, Regulations, and Non-Binding Agreements

This section covers international treaties, regulations issued by the International Telecommunication Union ("ITU"), and non-binding international agreements, which collectively inform the laws and regulations adopted by the United States.

Name	Section	Governing Body	Summary
The Outer Space Treaty	Art. VI, VII, & XI	United Nations Office for Outer Space Affairs	The Outer Space Treaty ("OST") is the foundation of international space law. It governs the exploration and use of outer space, including the Moon and other celestial bodies. Relevant provisions appear below: • Article VI – "The activities of nongovernmental entities in outer space, including the Moon and other celestial bodies, shall require authorization and continuing supervision by the appropriate State Party to the Treaty." • Article VII – The nation from whose territory or facility an object is launched into space is liable for damages to others. • Article XI – Nations conducting activities in space must inform the U.N. Secretary-General and the public of those activities to the greatest extent practicable.
Convention on Registration of Objects Launched into Outer Space	Art. II, IV	United Nations Office for Outer Space Affairs	The Registration Convention expands on Articles VI and XI of the OST. Relevant provisions appear below: • Article II – States must maintain a registry in which it records objects launched into space. • Article IV – Each state must provide information concerning each space object in its registry to the U.N. Secretary-General.

Name	Section	Governing Body	Summary
Principles Relating to Remote Sensing of the Earth from Outer Space	Principle I, IV	United Nations Office for Outer Space Affairs	This non-binding UN resolution adopts certain principles relating to remote sensing. "Remote sensing" means the sensing of the Earth's surface from space by making use of the properties of electromagnetic waves emitted, reflected or diffracted by the sensed objects, for the purpose of improving natural resources management, land use and the protection of the environment. Remote sensing activities "shall be conducted on the basis of respect for the principle of full and permanent sovereignty of all States and peoples over their own wealth and natural resources, with due regard to the rights and interests, in accordance with international law, of other States and entities under their jurisdiction. Such activities shall not be conducted in a manner detrimental to the legitimate rights and interests of the sensed State."
Space Debris Mitigation Guidelines of the Committee on the Peaceful Uses of Outer Space	Section 4	United Nations Office for Outer Space Affairs	This non-binding document contains recommendations on space debris mitigation measures for UN Member States. Section 4 details general space debris mitigation guidelines.
ITU Radio Regulations	ITU RR Art. 5, Art. 9	International Telecommunication Union	This page provides the complete texts of the ITU Radio Regulations, which govern spectrum use for satellites, including Earth-to-space, space-to-Earth and space-to-space links. Art. 5 contains the Table of Frequency Allocations and Art. 9 indicates the procedure for affecting spectrum coordination.

Name	Section	Governing Body	Summary
World Radiocommunication Conference 2019	ITU Resolution 660, 32 Annex	International Telecommunication Union	ITU Resolution 660 designates the frequency band 137-138 MHz for use by non-geostationary satellites with short-duration missions in the space operation service. ITU Resolution 32 Annex applies the provisions of Articles 9 and 11 of the ITU Radio Regulations to non-geostationary-satellite networks and systems identified as short-duration missions.
ITU-R Resolutions	Resolution 74	International Telecommunication Union	The ITU resolved to develop a Handbook on best practices for the sustainable use of frequencies and associated NGSO orbits by space radiocommunication services, including active space debris removal. The ITU noted that "it is important to consider long-term space sustainability in the formation of policies and procedures for the efficient use of radio-frequency spectrum and satellite-orbit resources." The ITU's resources and guidelines on space sustainability can be accessed via the Space Sustainability Gateway.

Name	Section	Governing Body	Summary
World Radiocommunication Conference 2023	Resolutions 679, 680, 249	International Telecommunication Union	Resolution 679 extends the inter-satellite service allocation in the frequency bands 18.1-18.6 GHz, 18.8-20.2 GHz, and 27.5-30 GHz for use by non-geostationary space stations within specified conditions. Resolution 680 resolves to complete studies on frequency-related matters, including possible new or modified space research service (space-to-space) allocations, for future development of communications on the lunar surface and between lunar orbit and the lunar surface. Resolution 249 resolves to complete studies of the frequency bands 1518-1544 MHz, 1545-1559 MHz, 1610-1645.5 MHz, 1646.5-1660 MHz, 1670-1675 MHz, and 2483.5-2500 MHz for space-to-space transmissions applications.
Artemis Accords	Artemis Accords	Inter-governmental non-treaty agreement	The Artemis Accords are a series of non-binding multilateral arrangements between the United States government and other world governments that elaborates on the norms expected to be followed in outer space. As of this document's production, fifty-five countries have signed the Accords.

3. U.S. Current Legislation and Rules

This section covers legislation and rules that are currently in effect. ISAM operators should make efforts to comply with these requirements.

Law/Regulation	Relevant Rules	Agency	Summary
UN Space Object Registration	Outer Space Treaty Registration Convention	U.S. Department of State	The State Department Office of Space Affairs manages space object registration for the United States and usually registers FCC- or NOAA-licensed missions.
UN Liability Convention	Liability Convention	U.S. Department of State	Claims for damages under the Liability Convention would be sent to the State Department. U.S. licensing regulations reflect obligations under the Liability Convention.
Communications Act	47 C.F.R. Parts 5, 25	Federal Communications Commission	The Communications Act and FCC regulations establish requirements for satellite radiofrequency communications. The rules include access to frequency bands, band sharing, and interference protection. The FCC has also established requirements for orbital debris mitigation.
National and Commercial Space Programs Act	16 C.F.R. Part 960	National Oceanic & Atmospheric Administration	The use of cameras on spacecraft may require a commercial remote sensing license. Operators can fill out the Initial Contact Form to receive guidance on whether a license is necessary.
Commercial Space Launch Act	14 C.F.R. Parts 415, 450	Federal Aviation Administration[1]	The FAA, in consultation with the FCC and other agencies, reviews payloads on a proposed launch to ensure that all payloads have obtained all required licenses. FAA also sends payload information to the State Department for the purpose of Space Object Registration (see above).

[1] The FAA also uses the term "ISAM" to refer to the Integrated Safety Assessment Model, which evaluates aviation accidents.

Law/Regulation	Relevant Rules	Agency	Summary
			The Part 450 reentry rules apply to satellite reentry missions landing intact on Earth's surface.
Arms Export Control Act	22 C.F.R. §§ 120-130	U.S. Department of State; Directorate of Defense Trade Controls	The Department of State's Directorate of Defense Trade Controls regulates the export, re-export, retransfer, temporary import, and brokering of defense articles and defense services, as well as related technical data. Known as the ITAR (International Traffic in Arms Regulations), these regulations apply primarily to military technology, technical data and services. However, certain satellite technologies, GPS systems, navigation systems, and sonar and radar systems may fall under the scope of ITAR. ITAR-controlled items presumptively require a license for the brokering of or export, re-export, or retransfer to any country.
Export Administration Act Export Control Reform Act of 2018	15 C.F.R. §§ 730-774	U.S. Department of Commerce; Bureau of Industry and Security	The Commerce Department's Bureau of Industry and Security ("BIS") administers laws, regulations, and policies governing the export, re-export, and transfer of commercial and "dual-use" *(i.e.,* having both commercial and military applications) commodities, software, and technology subject to the Export Administration Regulations ("EAR"). Items not controlled by another agency are controlled under the EAR, such as certain telecommunications equipment. Whether the item requires a license to export, re-export, or transfer (in-country) to a foreign destination depends on the item's Export Control Classification Number, the destination country, the end user, and the end use.
Export Administration Regulations Amendment	15 C.F.R. Parts 742, 774	U.S. Department of Commerce; Bureau of Industry and Security	The BIS recently: • Amended the EAR to remove the license requirement for exports and re-exports to Australia, Canada, and the United Kingdom of certain spacecraft and related items involving remote sensing or space-based logistics,

Law/Regulation	Relevant Rules	Agency	Summary
			assembly, or servicing. The rule became effective October 23, 2024. • Issued an interim final rule[2] to clarify and build on export controls related to advanced computing integrated circuits and semiconductors. • Rescinded an interim final rule regarding advanced computing integrated circuits and a new control on artificial intelligence model weights for certain AI models and announced additional steps to strengthen export controls on semiconductors worldwide. • Issued an interim final rule removing license requirements for exports of certain spacecraft components to over 40 allies and partners worldwide, reducing licensing requirements for the least sensitive components for most destinations, and broadening license exceptions to support additional NASA cooperative programs.
Foreign Assets Control Regulations	31 C.F.R. Chapter V	U.S. Department of the Treasury; Office of Foreign Assets Control	The Treasury Department's Office of Foreign Assets Control administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. The sanctions can be either comprehensive or targeted, using the blocking of assets and trade restrictions to accomplish foreign policy and national security goals. License requirements apply for activities involving sanctioned individuals and entities and activities in comprehensively sanctioned countries or in certain sectors of a foreign country's economy.

[2] Interim final rules become effective immediately upon publication in the Federal Register. The issuing agency may later amend or modify the rule after receiving public comment.

4. U.S. Proposed Legislation

This section discusses legislation introduced in Congress. Most bills introduced during the 118th Congress were not passed but are included for reference if the bills are reintroduced or similar legislation is proposed.

Entity	Item	Status	Summary
118th Congress	H.R.8787 – ORBITS Act	Not passed; with the House Committee on Science, Space, and Technology	The Act would: • Require the Department of Commerce to publish and periodically update a list of orbital debris that may be remediated to reduce the risk of harm to orbiting satellites and on-orbit activities; • Require NASA (or third-party NASA contracts) to: 1. Establish a demonstration program to foster the development of technologies to remediate orbital debris on the list; and 2. Carry out other research and development activities to advance technologies for remediating orbital debris; • Require the National Space Council to update the *Orbital Debris Mitigation Standard Practices* within 90 days of the bill's enactment and periodically thereafter to address satellite constellations and planned space systems, collision risks, and disposal of space systems post-mission.
118th Congress	S.4010 – SAT Streamlining Act	Not passed; with the Senate Committee on Commerce, Science, and Transportation	The Act would: • Require the FCC to streamline procedures for granting licenses for both GSOs and NGSOs; • Establish a 1-year shot clock for the FCC to grant or deny satellite or earth station license applications;

Entity	Item	Status	Summary
			• Establish a 180-day shot clock for the FCC to grant or deny a renewal of GSO and NGSO licenses, grants of market access, or earth stations; • Allow the FCC to authorize emergency licenses for 180 days if needed for national security or defense purposes; • Establish a 30-day shot clock for the FCC to put an application out for public notice or notify the applicant if their application is incomplete; and • Require the FCC to update its rules for interference protection and spectrum sharing every two years.
118th Congress	H.R.290 – Commercial Remote Sensing Act of 2023	Not passed; with the Senate Committee on Commerce, Science, and Transportation after it passed the House	This bill modifies provisions relating to the licensing of private remote sensing space systems. The bill decreases from 120 to 60 days the amount of time in which the National Oceanic and Atmospheric Administration must review and make a determination on an application for a license to operate a private remote sensing space system. Further, the bill expands annual reporting on the licensing of private remote sensing systems to include a list of all applications, listed by tier, as well as the rationale for each tier categorization (currently, each license is categorized into one of three tiers based on whether the system produces or is capable of producing unenhanced data that is already available from other entities). Additionally, the report must include all terms, conditions, or restrictions placed on licensees.

Entity	Item	Status	Summary
118th Congress	H.R.6131 – Commercial Space Act of 2023	Not passed; with the House Committee on Science, Space, and Technology	The Act would: • Provide a streamlined authorization and supervision certification process for nongovernmental space activities; • Designate the Department of Commerce Office of Space Commerce ("OSC") as the single authority responsible for the authorization and supervision certification process; • Establish a Private Space Activity Advisory Committee to monitor the effectiveness and efficiency of the new certification process, make recommendations on how the U.S. can further promote and facilitate a robust and innovative private space sector, and identify challenges the U.S. private space sector faces; • Support private sector development and ISAM deployment and encourage U.S. development of space nuclear power and propulsion technology.
119th Congress	S.428 – Situational Awareness of Flying Elements (SAFE) Orbit Act	Amended and reported favorably out of the Senate Committee on Commerce, Science, and Transportation	This bill provides statutory authority for the Traffic Coordination System for Space, which is being developed by the Office of Space Commerce ("OSC") to provide space situational awareness data and services to space operators. The bill also authorizes OSC to acquire location tracking data, positional and orbit determination information, conjunction data messages, and other data, analytics, information, and services deemed necessary to avoid collisions in space. OSC must disseminate this information

Entity	Item	Status	Summary
			at no charge (1) through a public database of space situational awareness information and services, including space traffic coordination; and (2) through the provision of basic situational awareness services to satellite operators. The bill also sets forth certain requirements for the collection and dissemination of such information, including that, to the extent practicable, the provision of service to satellite operators may not compete with private situational awareness products.
119th Congress	H.R.2313 – Celestial Time Standardization Act	Ordered to be reported by voice vote by Committee on Commerce, Science, and Transportation	This bill requires the NASA Administrator to develop celestial time standardization to support future operations and infrastructure on and around the Moon and other celestial bodies other than Earth.

5. U.S. Proposed and Recently Granted Regulations

This section discusses proposed rules issued by federal agencies. Many of these requirements are not yet effective. ISAM operators might use public comment opportunities to provide feedback.

Entity	Item	Status	Summary
Department of Commerce	End-Use and End-User Based Export Controls, Including U.S. Persons Activities Controls: Military and Intelligence End Uses and End Users	Comments were due by October 15, 2024. Comments may be accessed at BIS-2024-0029.	The proposed rule expands current restrictions on "military end users" and "military end uses" and adds additional categories of end users subject to these restrictions – "intelligence end users," and "military support end users." These expanded restrictions include requiring a license for exports, re-exports, or transfers of all items subject to the EAR to "military end users" and "intelligence end users" and expand the countries to which this license is required. The proposed rule also imposes restrictions on U.S. person "support" of military end users and intelligence end users.
Department of Commerce	Export Administration Regulations: Crime Controls and Expansion/ Update of U.S. Persons Controls	Comments were due by October 15, 2024. Comments may be accessed at BIS-2023-0006.	This proposed rule identifies new categories of end users, including foreign security end users, to which a license would apply to export, re-export, or transfer items subject to the EAR. The proposed rule also proposes controls of facial recognition technology.
Department of Commerce	Export Administration Regulations Interim Final Rule	Comments were due November 22, 2024. Comments may be accessed at BIS-2024-0031.	The interim final rule removes license requirements for exports of certain spacecraft components to over 40 allies and partners worldwide, reducing licensing requirements for the least sensitive components for most destinations, and broadening license exceptions to support additional NASA cooperative programs.

Entity	Item	Status	Summary
Department of Commerce	Revisions to Space-Related Export Controls Notice of Proposed Rulemaking	Comments were due November 22, 2024. Comments may be accessed at BIS-2018-0029.	The NPRM, published alongside a Department of State NPRM (summarized below), proposes to transfer jurisdiction of certain space-related defense articles that no longer provide a critical military or intelligence advantage from the U.S. Munitions List ("USML") maintained by the Department of State to the more flexible Commerce Control List. The NPRM also proposes additional license exceptions to authorize official exports, re-exports, or transfers related to official agency programs or space tourism and research subject to certain conditions. Examples include spacecraft that contribute to space domain awareness, collision avoidance, cooperative docking, and tracking of ground vehicles and aircraft, among other capabilities. This proposed transfer would enable the use of BIS license exceptions that facilitate exports of commercial space items to close allies and partners.
Department of State	International Traffic in Arms Regulations: Revisions to Definition and Controls Related to Defense Services	Comments were due by October 15, 2024. Comments may be accessed at DOS-2024-0023.	The proposed rule intends to control activities by U.S. persons that provide a critical military or intelligence advantage to foreign persons and therefore warrant control under the ITAR (and are not currently controlled) and adds reference to two new USML paragraphs related to Intelligence and Military Assistance that would be controlled under the ITAR regardless of whether defense articles are involved.

Entity	Item	Status	Summary
Department of State	ITAR: U.S. Munitions List Categories IV and XV Notice of Proposed Rulemaking	Comments were due November 22, 2024. Comments may be accessed at DOS-2024-0035.	The Department of State proposes to amend ITAR in multiple USML Categories, including to revise USML Categories IV (Launch Vehicles, Guided Missiles, Ballistic Missiles, Rockets, Torpedoes, Bombs, and Mines) and XV (Spacecraft and Related Articles) and related sections to clarify and standardize the regulatory text, add items that warrant designation on the USML, and remove items that no longer warrant designation on the USML (discussed above). The Department further proposes to add three new license exemptions to ITAR: • An official space agency exemption that would exempt certain transfers of defense articles and services within specific U.S. government space programs; • A space activity exemption that would (1) authorize certain transfers of defense articles and services for space launches, including some electrical connectors deemed low-risk; (2) allow services for telemetry transmission related to space launch vehicles to enhance flight safety; (3) permit collaboration with foreign entities using on-orbit defense articles for fundamental research; (4) authorize services for radiofrequency transmissions involving on-orbit defense articles, such as geolocation and emergency broadcasts. • A space tourism and research exemption that would authorize transfers of manned spacecraft for space tourism or fundamental research, with exemptions specifically for basic and applied research (not applicable to engineering

Entity	Item	Status	Summary
			development, design and development of defense articles, or research under publication restrictions or non-disclosure agreements).
Federal Aviation Administration	Aerospace Rulemaking Committee	The FAA chartered a rulemaking advisory committee, the Part 450 SpARC, to advise the FAA on improvements to the Part 450 launch and reentry licensing requirements.	The committee will gather recommendations from industry and other stakeholders to help the FAA improve the Part 450 launch and reentry licensing requirements. This includes the issuance of new licenses, the renewal or modification of existing licenses, and conducting payload reviews.
Federal Aviation Administration	Orbital Debris Notice of Proposed Rulemaking	Comments were due December 26, 2023, and AST was expected to issue a rule in early 2025; this has been delayed to early summer 2025. Comments may be accessed at FAA-2023-1858.	The NPRM proposes to require commercial space operators to choose from among five options to dispose of the upper stages of launch vehicles: • Conduct a controlled reentry; • Move the upper stage to a less congested storage or graveyard orbit; • Send the upper stage on an Earth-escape orbit; • Retrieve the upper stage within five years; or • Perform an uncontrolled atmospheric disposal.
Federal Communications Commission	ISAM Notice of Proposed Rulemaking	Comments were due April 29, 2024; reply comments were due May 29, 2024. Comments may be accessed at IB Docket Nos. 22-271 and 22-272.	Although the comment period has passed, opportunities still exist for engagement with the Commission on this proceeding. The FCC proposes to define "ISAM space stations," establish a new framework for licensing them, and adopt the following provisions: • License ISAM space stations through existing rules and processes, including a proposal to allow

Entity	Item	Status	Summary
			operators of ISAM space stations to elect to apply through existing license procedures; • Exempt ISAM space stations from the NGSO processing round rules and the GSO first-come-first-served process, provided that the ISAM applicant demonstrates that operations will be compatible with existing operations and not materially constrain future use; • Require ISAM applicants to provide licensing information for any space station with which the ISAM applicant proposes to conduct RPO; • Require operators of ISAM space stations, including operators of space stations conducting debris remediation, to comply with the Commission's existing orbital debris mitigation rules; • Review ISAM operators' requests for frequency use on a case-by-case basis; and • Establish a one-year grace period for ISAM space station licensees or market access grantees to meet the Commission's milestone requirement or else file a surety bond.
Federal Communications Commission	Third Report and Order on Space and Earth Station Regulatory Fees Regulatory Fees Notice of	The Third Report and Order is effective September 14, 2025. Comments on the NPRM are due July 7, 2025; reply comments are due July 21,	Each year, the FCC proposes, collects comments on, and then adopts regulatory fees for space and earth stations, among others. The Third Report and Order makes the following changes:

Entity	Item	Status	Summary

	Proposed Rulemaking for Fiscal Year 2025	2025. Filings may be accessed at MD Docket Nos. 24-85 and 25-190.	• Assesses regulatory fees on space and earth stations once they are authorized (instead of when the stations are certified to be operational); and
			• Splits the NGSO Other regulatory fee category into two new categories: Small Constellation (<1,000 authorized space stations) and Large Constellation (>1,000 or more authorized space stations).
			
			The NPRM proposes annual regulatory fee changes for space and earth stations authorized as of October 1, 2024 (FY 2025). Summarized below are the possible related rates using the newly adopted NGSO fee categories.
			• Earth Station at $2,840 (a $230 increase from FY 2024)
			• GSO at $136,505 (a $7,650 decrease from FY 2024)
			• NGSO
			  ○ Small Satellites at $12,330 (a $115 increase from FY 2024)
			  ○ Less Complex at $239,260 (a $202,665 decrease from FY 2024)
			  ○ Other (Small Constellation (<1,000 Satellites)) at $441,715 (a $522,485 decrease from FY 2024's general NGSO Other category)
			  ○ Other (Large Constellation (>1,000 Satellites)) at $1,914,095 (a $949,895 increase from FY 2024's general NGSO Other category)

Entity	Item	Status	Summary
			• Principally Rendezvous & Proximity Operations or On-Orbit Servicing, including Orbit Transfer Vehicles at $12,330 (a $115 increase from FY 2024)
Federal Communications Commission	Orbital Debris Record Refresh	FCC Space Bureau sought comments by Public Notice released May 2, 2024. Comments were due June 27, 2024; replies were due July 12, 2024. Comments may be accessed in IB Docket Nos. 18-313 and 22-271	Although the comment period has passed, opportunities still exist for engagement with the Commission on this proceeding. The PN seeks comment generally on issues raised in the 2020 Further Notice of Proposed Rulemaking (FCC 20-54) and the existing record in the proceeding as well as: • Whether it should analyze collision risks based on the entire system (system-wide or in the aggregate) or on individual satellites (per-satellite) within a multi-satellite NGSO system; • If system-wide, the relevant factors in a collision-risk analysis; • Whether it should adopt a safe harbor or bright-line rule for orbital debris and the process for analyzing orbital debris showings by systems that do not meet the safe harbor; • A 100 object-years metric for assessing collision risk; • The role of maneuvering capabilities in mitigating collision risk; • Ways to assess collision risk associated with failed satellites; and • The present state of the orbital debris environment and the satellite industry at large.

Entity	Item	Status	Summary
Federal Communications Commission	NGSO/GSO Spectrum Sharing Notice of Proposed Rulemaking	Comments are due July 28, 2025; reply comments are due August 27, 2025. Comments may be accessed in SB Docket No. 25-157.	The NPRM seeks comment on the spectrum sharing regime between GSO and NGSO systems operating in the 10.7-12.7, 17.3-18.6, and 19.7-20.2 GHz bands. Specifically, the NPRM invites comment on how satellite technology and operations have changed since equivalent powerflux density limits were adopted, how the current limits protect GSO networks and impact the services provided by NGSO systems, and whether alternative sharing frameworks would promote greater efficiency.
Federal Communications Commission	Satellite Broadband Further Notice and Notice of Proposed Rulemaking	Comments are due July 28, 2025; reply comments are due August 27, 2025. Comments may be accessed at SB Docket No. 25-180.	The FNPRM seeks further comment on ways to use the 12.7-13.25 GHz band and the 42.0-42.5 GHz band more efficiently and intensively by satellite communications. The NPRM seeks comment on proposals to make additional spectrum resources available for satellite communications, particularly satellite broadband, in the 51.4-52.4 GHz band and certain "W-band" frequencies (92.0-94.0 GHz, 94.1-100 GHz, 102.0-109.5 GHz, and 111.8-114.25 GHz).
Federal Communications Commission	Foreign Ownership Notice of Proposed Rulemaking	Comments are due July 21, 2025; reply comments are due August 19, 2025. Comments may be accessed at GN Docket No. 25-166.	The NPRM proposes to require holders of covered Commission-issued licenses, authorizations, or approvals to certify whether they are owned by, controlled by, or subject to the jurisdiction or direction of a foreign adversary and, if so, to disclose foreign ownership interests and the nature of the foreign adversary ownership and control.

Entity	Item	Status	Summary
National Oceanic & Atmospheric Administration	Request for Information	Comments were due April 8, 2024.	NOAA's Commercial Remote Sensing Regulatory Affairs ("CRSRA") seeks industry input regarding what rules or guidance it should pursue for private remote sensing satellite disposal and debris mitigation. Specifically, CRSRA seeks input on the following: • Whether CRSRA should issue guidance or initiate a rulemaking and whether rules would apply to all CRSRA licensees or only satellites without FCC licenses; • How any rulemakings or guidance should address existing licenses; • Benefits and drawbacks of CRSRA clarifying its supervision; • Which industry standards and best practices CRSRA should consider; • How to define the kinds of activities that are captured by the term "termination of operations"; • The list of means or methods CRSRA should permit for disposal; • The type and content of documentation CRSRA should require; • Any disposal and orbital debris mitigation considerations unique to remote sensing systems; and • Methods for CRSRA to verify compliance with the license requirement to make disposition of satellites.

Entity	Item	Status	Summary
National Telecommunications and Information Administration	National Spectrum Strategy Implementation Plan	Meetings for non-federal stakeholders occurred in August and October 2024.	NTIA identified the 7.125-8.4 GHz band for study and potential repurposing. It is currently unclear whether the current Administration will continue to follow the National Spectrum Strategy.

6. Policy Statements & Guidance

This section covers policy documents, guidance, and other non-binding releases. ISAM operators might consider how their missions align with the strategic goals outlined by these documents. Note that with the current Administration, many of these policy statements are no longer effective.

Entity	Item	Summary
White House	Executive Order 14192	**Sec. 3**. *Regulatory Cap for Fiscal Year 2025.* (a) Unless prohibited by law, whenever an executive department or agency (agency) publicly proposes for notice and comment or otherwise promulgates a new regulation, it shall identify at least 10 existing regulations to be repealed.
White House	Novel Space Activities Authorization and Supervision Framework (Dec. 20, 2023) No longer on White House website; moved to archives.gov	The Framework directs the Secretaries of Commerce and Transportation to co-lead a Private Sector Space Activities Interagency Steering Group in consultation with the FCC Chairperson. The Steering Group will consist of members of various government agencies. In consultation with industry, the Group will "collate, develop, and promote standards, best practices, and information sharing protocols to address core U.S. Government interests common to novel space activities." The Framework also directs Commerce and Transportation to minimize burdens on industry and U.S. Government entities by aligning oversight processes for private space sector novel activities, including strict timelines for applications and interagency reviews, with a transparent elevation process to adjudicate disagreements, and harmonize the timing of, and language in, legislative proposals and respective Administrative Procedure Act rulemakings.

Entity	Item	Summary
White House	National ISAM Implementation Plan (Dec. 19, 2022) No longer on White House website; moved to archives.gov Copy available at COSMIC website	The Implementation Plan breaks down the ISAM policy goals listed in the National Strategy (see below) into discrete objectives. The Implementation Plan calls for agencies to define future missions and architectures to use ISAM capabilities and study ISAM capability needs and gaps to further advance ISAM technologies. The U.S. government has a clear role in helping the spacecraft and mission designers and operators develop standards to facilitate ISAM use not only through engagements with commercial partners, but through incorporating those well-developed standards into government spacecraft. Regarding test infrastructure, the Plan highlights activities to assess the gaps in the current capabilities as well as directs agencies to develop an approach for in-space propellant infrastructure.
White House	ISAM National Strategy (Apr. 5, 2022) No longer on White House website; moved to archives.gov Copy available at COSMIC website	The Strategy establishes six goals for U.S. ISAM development and commits to supporting efforts to achieve them: • Advance ISAM research and development; • Prioritize the expansion of scalable infrastructure; • Accelerate the emerging ISAM commercial industry; • Promote international collaboration and cooperation to achieve ISAM goals; • Prioritize environmental sustainability; and • Inspire a diverse future workforce.

Entity	Item	Summary
White House	National Spectrum Research and Development Plan (Oct. 9, 2024) No longer on White House website; moved to archives.gov	The Office of Science and Technology Policy created this tool to help guide government decisions and private sector efforts in spectrum-related research, ensuring U.S. leadership in the field. It identifies opportunities in four key areas: • Finding cost-effective solutions tied to current and future operational spectrum use cases; • Exploring advanced spectrum science, potentially leading to long-term breakthroughs from speculative ideas; • Promoting initiatives designed to expedite spectrum research and development progress; and • Creating strategies for enhancing the structure of spectrum research and development efforts.
White House	National Spectrum Strategy Implementation Plan (Mar. 12, 2024) Still available on NTIA website; dubious validity	The Implementation Plan provides a public roadmap to realize the goals of the National Spectrum Strategy (see below). For each strategic objective, the Plan identifies specific outcomes, with responsible Federal agencies, contributing stakeholders, and a timeline for both the beginning and the expected completion of the effort.

Entity	Item	Summary
White House	National Spectrum Strategy (Nov. 13, 2023) No longer on White House website; moved to archives.gov Copy also available on NTIA website	The Strategy establishes four pillars to modernize spectrum policy and make the most efficient use possible: • Create a spectrum pipeline to ensure U.S. leadership in advanced and emerging technologies; • Engage in collaborative long-term planning to support the nation's evolving spectrum needs; • Support spectrum innovation, access, and management through technology development; and • Expand spectrum expertise and elevated national awareness.
White House	National Cislunar Science & Technology Strategy (Nov. 17, 2022) No longer on White House website; moved to archives.gov	The Cislunar Strategy provides a vision and the first science and technology objectives for realizing U.S. leadership in cislunar space, including the Moon. The key objectives of the strategy are: • Support research and development to enable long-term growth in cislunar space; • Expand international science and technology cooperation in cislunar space; • Extend U.S. space situational awareness capabilities into cislunar space; and • Implement cislunar communications and positioning, navigation, and timing capabilities with scalable and interoperable approaches.

Entity	Item	Summary
White House	National Orbital Debris Implementation Plan (June 28, 2022) No longer on White House website; moved to archives.gov	This Orbital Debris Implementation Plan provides tangible actions the United States will pursue to address the hazards posed by orbital debris. It identified 43 actions for agencies across three pillars: debris mitigation; tracking and characterization of debris; and remediation of debris.
White House	United States Space Priorities Framework (Dec. 1, 2021) No longer on White House website; moved to archives.gov	The Framework outlines policy priorities for the United States: • Maintain U.S. leadership in space exploration and space science; • Advance the development and use of space-based Earth observation; capabilities that support action on climate change; • Foster a policy and regulatory environment that enables a competitive and burgeoning U.S. commercial space sector; • Protect space-related critical infrastructure and strengthen the security of the U.S. space industrial base; • Defend its national security interests from the growing scope and scale of space and counterspace threats; • Invest in the next generation; • Lead in strengthening global governance of space activities; • Bolster space situational awareness sharing and space traffic coordination; and • Prioritize space sustainability and planetary protection.

Entity	Item	Summary
Federal Communications Commission	Statement of Chairwoman Rosenworcel (Feb. 15, 2024)	"I believe our grandest ambitions for space will depend on developing these ISAM capabilities. Because if we want to expand connectivity on Earth, address global climate change, protect our national security, and support human life on the moon and beyond, we will benefit from ISAM systems."
Federal Communications Commission	Transparency Initiative	The Transparency Initiative provides guidance on licensing for satellites and earth stations, as well as orbital debris mitigation. Specifically, it explains the FCC's: • Space Station Licensing Process, breaking down licensing types, general requirements for applications, regulatory fees, license terms, and the streamlined process in place for small satellites; • Earth Station Licensing Process, discussing the application and licensing process, license contents, license terms and renewals, common defects seen in applications, and frequently asked questions; and • Orbital Debris Mitigation (ODM) Plan requirements, including guidance documents, open house resources, NASA's Debris Assessment Software (DAS), disclosure requirements, and relevant FCC documents. The page also explains the required national and international frequency coordination when an application is filed, the U.S. government's interagency payload review process, and the FCC's authorization to issue experimental licenses.
NOAA Office of Space Commerce	Navigating U.S. Commercial Space Regulations	This page hosts links to FAQs, application checklists, and application portals for the FAA, NOAA, and FCC.
NOAA Commercial Remote Sensing Regulatory Affairs	CRSRA FAQs	This page hosts frequently asked questions regarding obtaining a commercial remote sensing license.

Entity	Item	Summary
NOAA Office of Space Commerce	U.S. Export Controls for the Commercial Space Industry	The U.S. Department of Commerce and the Federal Aviation Administration published in 2017 a handbook on export controls for the space industry. The handbook provides basic information to serve as a starting point for commercial space operators to familiarize themselves with export control regulations. The 2017 version of the handbook is the most recent.
NOAA Office of Space Commerce	Satellite Export Control Regulations	This page hosts links to export control regulations and information on Russian sanctions as they affect commercial launch services.
NOAA Office of Space Commerce	Traffic Coordination System for Space (TraCSS)	This traffic coordination system aims to provide basic space situational awareness (SSA) data and services to civil and private space operators and support spaceflight safety, space sustainability, and international coordination. OSC is implementing TraCSS in the following phases: • Phase 1.0: launched Sept. 30, 2024, and provides conjunction data messages to a beta set of users via Space-Track.org; • Phase 2: slated to begin FY 2026 and focus on launch collision avoidance; and • Phase 3: to focus on re-entry assessment/management and other priority areas.

7. White Papers

This section covers papers and articles discussing ISAM U.S. policies and regulations, or the need for such policies and regulations were none currently exist.

Publication	Title	Summary
Center for Space Policy and Strategy	In-Space Servicing, Assembly, and Manufacturing for the New Space Economy	The paper describes the state of the ISAM industry as of July 2022, including market and growth challenges. The paper also describes how various satellite industry players are responding to these challenges with new technologies, architectures, and business models to drive adoption and advance the ISAM state of play.
MIT Science Policy Review	Regulatory Challenges and Policy Gaps for In-Space-Servicing, Assembly, and Manufacturing Technologies	This article explores how ISAM technologies fit into the existing satellite policy landscape. It focuses on two key areas: (1) unique regulatory challenges, including supervision responsibilities, ownership issues, and intellectual property rights of space objects, and (2) the broader satellite-related issues that also impact ISAM.
npj Advanced Manufacturing	Conceptualizing Space Environmental Sustainability	This article discusses recent advancements in ISAM and the need to redefine "space sustainability," particularly in low-Earth orbit and cislunar space. It proposes a framework for assessing space sustainability, focusing on areas like pollution, resource depletion, landscape alteration, and environmental justice, along with metrics to evaluate impacts in these domains.