

Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: i of iv
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	



RELEASE DATE: 12/08/2025

COSMIC-E01-PR004-2025-A

COSMIC

CONSORTIUM FOR SPACE MOBILITY AND ISAM CAPABILITIES

REGULATIONS 102: NOAA CRSRA SATELLITE IMAGING LICENSING & ISAM OPERATIONS

Dr. Sarah Brothers
Director
Commercial Remote Sensing Regulatory Affairs (CRSRA)

Derek Hanson
Attorney Advisor
NOAA Office of General Counsel

Tony Lin
Partner
Cooley LLP



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: iii of iv
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

Contents

1.	Workshop Report	1
1.1	Summary	1
1.2	Key topics and questions addressed at the Workshop.....	1
1.2.1	What does CRSRA regulate?.....	1
1.2.2	How does CRSRA authority apply to foreign companies and operations?	1
1.2.3	What are common regulatory challenges with respect to jurisdictional matters?.....	1
1.2.4	What should applicants that have complex ownership or operational structures do?	2
1.2.5	How many types of licenses are there?.....	2
1.2.6	Does CRSRA regulate ISAM activities? Are there ISAM specific rules?	2
1.2.7	Are ISAM activities exempt from CRSRA jurisdiction under the mission assurance exemption?	2
1.2.8	Please describe the CRSRA licensing process and timeline.....	3
1.3	Audience Questions.....	4
1.3.1	Is a CRSRA license considered “authorization” for a space mission, as defined under the Outer Space Treaty Act?.....	4
1.3.2	Can operators obtain a license for multiple future missions, or must they seek authorization for each new mission?	4
1.3.3	Does CRSRA require licensing for short-range, low-powered SAR modes used only for sensing highly localized areas?	4
1.3.4	What is CRSRA’s jurisdiction over suborbital flights?	4
1.3.5	CRSRA rules regarding orbital disposal technically differ from those of the FCC. How does CRSRA implement disposal requirements under its rules?	4
1.3.6	When does CRSRA jurisdiction end?.....	4
1.3.7	Does CRSRA follow the FCC’s 5-year rule for licensing termination?.....	5
1.3.8	Is there an end in sight for CRSRA’s current staffing limitations and backlog?.....	5



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: iv of iv
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1.3.9 How does the August Executive Order affect CRSRA?..... 5



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: 1 of 5
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1. Workshop Report

1.1 Summary

On September 15, 2025, COSMIC hosted a Policy and Regulation workshop focused on the satellite imaging licensing process for the Commercial Remote Sensing Regulatory Affairs (CRSRA) division of the National Oceanic and Atmospheric Administration (NOAA), part of the U.S. Department of Commerce, in connection with in-space servicing, assembly, and manufacturing (ISAM) operations. Workshop panelists included Dr. Sarah Brothers, Director of CRSRA; Derek Hanson, Attorney Advisor at the NOAA Office of General Counsel; and Tony Lin, Partner and lead of the space tech and satellite initiative at Cooley LLP. The session provided practical insights into CRSRA’s jurisdiction, licensing classification tiers, the CRSRA regulatory process, and the evolving landscape for ISAM missions.

A summary of the workshop and the questions asked during the event are provided below. A recording of the workshop is available to COSMIC members [here](#).

1.2 Key topics and questions addressed at the Workshop

1.2.1 What does CRSRA regulate?

[CRSRA](#) regulates remote-sensing space systems capable of collecting unenhanced data that can be processed into imagery of Earth’s surface features. Jurisdiction is determined by imaging capability, not intent or use of imaging. Even coarse imagery taken by a satellite falls under CRSRA jurisdiction and may require licensing.

CRSRA’s rules are available in [15 C.F.R. Part 960](#) and the rules were recently updated [in 2020](#).

1.2.2 How does CRSRA authority apply to foreign companies and operations?

CRSRA’s authority covers U.S. persons and operations from the U.S., including subsidiaries and affiliates. Complex ownership and operational structures require careful analysis to identify the regulated entity. See [Guidance Circular, Determining whether a licensee is required based on mixed U.S. and foreign involvement in a private remote-sensing space system, GC No. 960.4-1 \(March 1, 2022\)](#).

1.2.3 What are common regulatory challenges with respect to jurisdictional matters?

Applicants often encounter difficulties in identifying the “operator” of satellite systems, which complicates the process of obtaining proper authorization for system operations. The diversification of the industry and complex contractual arrangements can make it unclear who is responsible for operational control, as defined under CRSRA’s rules. See [Guidance Circular, Guidance for Applicants and Licensees on Scope of Affiliates and Subsidiaries, GC No. 960.16-1 \(June 7, 2022\)](#).



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: 2 of 5
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1.2.4 What should applicants that have complex ownership or operational structures do?

CRSRA’s regulatory process requires case-by-case assessments to ensure thorough reviews of the capabilities and roles of all participating entities.

Applicants should contact NOAA through the [initial contact form](#) process (discussed below) to initiate discussions.

1.2.5 How many types of licenses are there?

There are three licensing classification tiers ([15 C.F.R. § 960.6\(a\)](#)):

Tier 1: System that collects unenhanced data that is substantially the same as unenhanced data already available from entities or individuals not licensed under this part, such as foreign entities.

Tier 2: System that collects unenhanced data that is substantially the same as unenhanced data already available from entities or individuals, but only from entities or individuals licensed under this part.

Tier 3: System that collects unique, unenhanced data not substantially the same as unenhanced data already available from any domestic or foreign entity or individual.

1.2.6 Does CRSRA regulate ISAM activities? Are there ISAM specific rules?

No ISAM-specific rules exist. Accordingly, CRSRA does not directly regulate ISAM activities.

Instead, CRSRA regulates the imaging activities associated with ISAM activities. ISAM missions often require instrumentation capable of remote sensing, bringing them under CRSRA authority.

CRSRA applies its general remote sensing regulations to ISAM missions.

1.2.7 Are ISAM activities exempt from CRSRA jurisdiction under the mission assurance exemption?

The “mission assurance exemption” allows for certain “self-imaging” activities but is narrow and fact specific. See [Guidance Circular, Instruments used primarily for mission assurance or other technical purposes, GC No. 960.2-1 \(April 1, 2022\)](#).

To avoid running afoul of licensing requirements, operators should seek CRSRA guidance.



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: 3 of 5
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1.2.8 Please describe the CRSRA licensing process and timeline.

1.2.8.1 Prefiling:

[Initial Contact Form](#) (ICF): The ICF is an optional process whereby a party may seek preliminary guidance from CRSRA regarding its regulations, including whether the party needs a CRSRA license at all.

- If CRSRA determines the party does not need a license, it will issue a letter to that effect.
- CRSRA encourages parties to seek guidance through the ICF process, rather than make its own assessment of whether it needs a CRSRA license.
- Completion of the ICF process can take from two weeks to several months, depending on the specific facts.
- Meetings: Parties may also request meetings with CRSRA to clarify CRSRA regulations and to facilitate processing of an application to be filed. [15 C.F.R. § 960.5\(a\)](#).

1.2.8.2 Application filing.

- A template application in Word format with embedded CRSRA guidance has historically been available on the CRSRA website.
- CRSRA encourages a consultation meeting with potential applicants before the application is submitted. [15 C.F.R. § 960.5\(a\)](#).
- When the application is ready for formal review, CRSRA will send the license application to the USG Agency partners for a complete review. This process will take no longer than seven days. [15 C.F.R. § 960\(c\)](#).
- After the application is identified as complete, CRSRA has 60 days to process the license application. [15 C.F.R. § 960.7\(b\)](#).
- There are no CRSRA application fees or annual regulatory fees.
- As part of this final review process, CRSRA consults with interagency partners (including the Department of Defense, Department of State, Director of National Intelligence, and Department of Interior) to determine the tier classification for the applicant's system.
- CRSRA sends the applicant an initial tier determination letter, allowing the applicant to respond and/or provide feedback. This process is designed to encourage applicant engagement and transparency throughout the categorization steps. [15 C.F.R. § 960\(a\)](#).

1.2.8.3 Grant/Denial

- To the panelist's knowledge, CRSRA has not denied a license to date.
- Applicants may appeal or seek modifications of any license determination, as outlined in [15 C.F.R. § 960.13](#).



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: 4 of 5
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1.3 Audience Questions

1.3.1 Is a CRSRA license considered “authorization” for a space mission, as defined under the [Outer Space Treaty Act](#)?

A CRSRA license is considered authorization for remote-sensing activities. A party may also need other authorizations (e.g., FCC) in order to conduct its proposed operations.

For additional guidance regarding “authorization” under the Outer Space Treaty Act, parties should consult the Department of State.

1.3.2 Can operators obtain a license for multiple future missions, or must they seek authorization for each new mission?

A single license can cover multiple missions over a spacecraft’s lifespan, provided the mission description accounts for all intended activities.

1.3.3 Does CRSRA require licensing for short-range, low-powered SAR modes used only for sensing highly localized areas?

Licensing depends on the sensor’s capability. If the system cannot collect unenhanced data of Earth’s surface features, it may fall outside of CRSRA’s jurisdiction. CRSRA reviews such cases on a case-by-case basis.

1.3.4 What is CRSRA’s jurisdiction over suborbital flights?

CRSRA does not regulate suborbital flights, i.e., generally flights that do not complete at least one full orbit of the Earth.

1.3.5 CRSRA rules regarding orbital disposal technically differ from those of the FCC. How does CRSRA implement disposal requirements under its rules?

[In 2020](#), CRSRA adopted rules stating that it would defer orbital debris mitigation requirements to the Federal Communications Commission (FCC).

[In 2024](#), CRSRA initiated a request for information proceedings, inviting comments on how and whether it should implement orbital debris disposal rules for CRSRA-licensed systems that are not licensed by the FCC.

1.3.6 When does CRSRA jurisdiction end?

Applicants must request termination of a license. [15 C.F.R. § 960.15\(b\)](#).

An operator that could still conduct imaging operations, even if the operator is not doing so, or the satellite is demising, is still required to have a license and comply with all license requirements, including completing the annual certification.



Revision: Rev A	Document No: COSMIC-E01-PR004-2025-A
Release Date: 12/08/25	Page: 5 of 5
Title: Regulations 102: NOAA CRSRA Satellite Imaging Licensing & ISAM Operations	

1.3.7 Does CRSRA follow the [FCC's 5-year rule](#) for licensing termination?

At present, CRSRA addresses those situations on a case-by-case basis. In general, CRSRA strives to be consistent with FCC orbital debris regulations.

1.3.8 Is there an end in sight for CRSRA's current staffing limitations and backlog?

No immediate resolution is expected; applicants should plan accordingly.

1.3.9 How does the [August Executive Order](#) affect CRSRA?

CRSRA is aware of the order but cannot comment on its impact at this time.

