

STATEMENT OF COMMISSIONER AJIT PAI

Re: *Comprehensive Review of Licensing and Operating Rules for Satellite Service*, IB Docket No. 12-267, Notice of Proposed Rulemaking

Opening a comprehensive review of our satellite licensing and operating rules has been a long time coming. More than a decade ago, our biennial regulatory review process identified the need to streamline and revise our satellite rules.¹ And this has become a regular refrain at the Commission, with recommendations to reexamine the rules issuing in 2005,² again in 2007,³ and in a follow-up to the 2006 biennial review adopted by the Commission just this week.⁴

That's why I am so pleased to support this Notice of Proposed Rulemaking that opens up a plenary review of our licensing and operating rules for satellite service. As reflected in the Notice, Commission staff have pored over literally hundreds of sections and subsections, provisions and subprovisions. They have tried to find ways to harmonize conflicting rules, to delete provisions that are no longer in effect, and to ensure that the rules on the books conform to our practice. Those few, those happy few, that band of lawyers that already knows the rules and understands how the system works may not benefit much from these clean-up efforts. But scrubbing the rules so that they are easier for companies, start-ups, and government watchdogs to understand is a valuable exercise in good government. I applaud Chairman Genachowski for starting us down this path, and I thank every member of the International Bureau staff who has dipped a laboring oar in these waters.

As we move forward with this proceeding, I hope we will hear back from stakeholders not only about the modifications proposed in this Notice but also about larger-scale reforms to our satellite licensing and operating rules. We propose streamlining a myriad of licensing and reporting obligations here, but we should think about whether all of these requirements are necessary as a threshold matter. We propose consolidating rules that apply differently to different satellite operators so that they apply across the board, but we should consider whether these rules deter satellite operators from investing in and launching new satellites. In short, we should focus on a basic question: What steps do we need to take to make the United States the most desirable country in the world for licensing and operating satellites? I look forward to reviewing the comments of all stakeholders and the analysis of our expert staff.

¹ *2000 Biennial Regulatory Review -- Streamlining and Other Revisions of Part 25 of the Commission's Rules Governing the Licensing of, and Spectrum Usage by, Satellite Network Earth Stations and Space Stations*, IB Docket No. 00-248, Notice of Proposed Rulemaking, 15 FCC Rcd 25128 (2000).

² *2004 Biennial Review*, IB Docket No. 04-177, International Bureau Staff Report, 20 FCC Rcd 343 (2005).

³ *2006 Biennial Regulatory Review*, IB Docket No. 06-154, International Bureau Staff Report, 22 FCC Rcd. 3138 (2007).

⁴ *2006 Biennial Regulatory Review -- Revision of Part 25*, IB Docket No. 06-154, Report and Order, FCC 12-116 (rel. Sept. 28, 2012).