STATEMENT OF
COMMISSIONER JESSICA ROSENWORCEL,
CONCURRING

Re: *Mitigation of Orbital Debris in the New Space Age*, IB Docket No. 18-313.

These days it is hard to think about anything more than the here and now. But if the present crisis has taught us anything, it is that getting ahead of problems is important. This is the best way to prepare for the future. That future is full of challenges—some known, some unknown.

Among the former is the explosion of activity in space, courtesy of so many new constellations and satellite systems. Preparing for this rush is important. Because the opportunities are big, but to realize them we have to get the growing challenge of orbital debris under control.

That's because so much has changed in the space world since the FCC last updated its orbital debris rules in 2004. Back then, there were about 800 satellites in operation and roughly 10,000 pieces of orbital debris larger than ten centimeters. Today there are more than 2,200 operational satellites; 22,300 pieces of orbital debris larger than ten centimeters; and nearly one million pieces of debris larger than one centimeter. Plus over the past year or so this agency has approved more than 13,000 new satellites for launch. More are headed our way. So the potential for debris and collisions is multiplying fast.

How do we plan for this future? We act now to get ahead of it. To this end, after more than a year of work, we now have an update to the United States Government Orbital Debris Mitigation Standard Practices, thanks to an interagency process led by NASA and required by Space Policy Directive-3.

Now it falls to the FCC to update its own rules. And while we should strive to harmonize our policies with this earlier federal update, we also need to be honest and recognize its scope. That's because the issues raised by large constellations are more urgent in commercial activity—where they are already being designed, built, and launched. Moreover, we need to recognize the FCC has unique authority. We are the *only* ones with jurisdiction over commercial space activities.

That makes our work to update the agency's 2004 orbital debris policies really important. And after more than a year of review, our staff developed a range of good ideas though there were a few issues—like indemnification—where we needed to ask deeper questions and learn more. And now we do just that thanks to the willingness of my colleagues to work together and improve what was initially proposed.

But I concur today because while this is a start, there is more we need to do. To that end, we are passing on one of the most important opportunities we teed up in the rulemaking that kicked off this proceeding—tightening the "25-year" rule that allows a satellite and debris from its launch to stay in orbit for 25 years after its mission ends. This rule simply does not make sense in today's orbital environment. According to a NASA study of large constellations, if we fail to start deorbiting satellites that have completed their missions within a more reasonable timeframe, the likelihood of catastrophic collisions will grow. While I would have preferred that we address this here, I appreciate that my colleagues are willing to continue this conversation in an additional rulemaking. I also would have preferred the agency make more progress on the collision risks for large constellations, accidental explosion risk, and maneuverability issues.

Going forward we need to prepare for the future with more speed and urgency if we want the United States to retain our global authority in space matters. Because we are not the only ones looking to the skies for innovation and economic growth. European leaders have already approved funding for the first active debris removal mission. Japan is funding an effort to develop a commercial debris removal service, too. I am convinced we can play a leadership role. But to do so, more work on these issues is necessary.