Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
	)	
Expediting Initial Processing of Satellite and Earth Station Applications	)	IB Docket No. 22-411
	)	
	)	
Space Innovation	)	IB Docket No. 22-271

SECOND REPORT AND ORDER

Adopted: August 7, 2025 **Released: August 8, 2025**

By the Commission: Chairman Carr and Commissioners Gomez and Trusty issuing separate statements.

I. INTRODUCTION

1. To support America's booming space economy, the Commission is undertaking a series of reforms to better orient its rules toward permissionless innovation. Through sensible changes, we are eliminating outdated barriers to space industry business models, giving satellite operators more flexibility to deliver new services, and deleting burdensome, unnecessary requirements. Today's action represents another milestone in the Commission's work to streamline, simplify, and modernize the processing of space and earth station applications.

2. The Commission's existing regulatory framework was developed for a space economy of the past.[1] While the space industry has become a pivotal force for America's economy and national security, the Commission's rules have not kept pace. In 2023, the U.S. space economy accounted for $142.5 billion of total U.S. Gross Domestic Product (GDP) and $240.9 billion of gross output.[2] Additionally, the global space economy expanded by 4 percent with the satellite ground segment specifically generating $155.3 billion in 2024.[3] The growth in economic output has created new jobs.[4]

[1] We note that the current part 25 rules were primarily adopted in the years prior to the establishment of large non-geostationary orbit (NGSO) constellations, Earth exploration-satellite services (EESS), and in-space servicing, assembly, and manufacturing (ISAM). *See, e.g.*, *Amendment of Part 25 of the Commission's Rules and Regulations to Reduce Alien Carrier Interference Between Fixed-Satellites at Reduced Orbital Spacings and to Revise Application Processing Procedures for Satellite Communications Services*, CC Docket No. 86-496, Order, 6 FCC Rcd 2806 (1991); *Comprehensive Review of Licensing and Operating Rules for Satellite Services*, IB Docket No. 12-267, Second Report and Order, 30 FCC Rcd 14713 (2015).

[2] *See* Patrick Georgi and Chris Surfield, New and Revised Statistics for the U.S. Space Economy, 2012-2023 at 2 (2025), https://apps.bea.gov/scb/issues/2025/03-march/0325-space-economy.htm?_gl=1*1k612fe*_ga*MTE3NDk1MjMyMC4xNzQxMzQ5MjQ4*_ga_J4698JNNFT*MTc0MzQzNzkyNy44LjEuMTc0MzQzNzkyNy42MC4wLjA (New and Revised Statistics for the U.S. Space Economy).

[3] *See* Press Release, Satellite Industry Association, Historic Number of Launches Powers Commercial Satellite Industry Growth – Satellite Industry Association Releases the 28th Annual State of the Satellite Industry Report (May 13, 2025), https://sia.org/historic-number-of-launches-powers-commercial-satellite-industry-growth-satellite-industry-association-releases-the-28th-annual-state-of-the-satellite-industry-report/.

[4] *See, e.g.*, New and Revised Statistics for the U.S. Space Economy at 6 ("Private industries employment for the space economy represented 373,000 full- and part-time employees in 2023…[e]mployment grew by 10,000 employees in 2022 and by 12,000 employees in 2023, partially reversing the long-term decrease from 2012-2021."); The World Economic Forum, Space: The $1.8 Trillion Opportunity for Global Economic Growth (2024),

(continued….)

The Commission, meanwhile, has seen a corresponding surge in licensing activity, as applications to operate space and earth stations have grown in complexity and number.[5] Faced with this uptick, the agency's licensing rules have resulted in inefficiencies and backlog. We are accordingly focused on revising and updating our part 25 space and earth station license application policies and processing procedures.

3. In this Second Report and Order (Order), we take the following actions to free operators of unnecessary regulatory hurdles:

- First, we adopt a new process by which earth station operators may receive a baseline license without identifying a specific satellite point of communication, and adopt processes by which earth station applicants can easily add or remove identified points of communication.[6] Under our prior rules, earth station operators could not receive a license without an identified point of communication and thus could not establish themselves as Ground-Station-as-a-Service (GSaaS) providers until they had already secured a satellite client, causing a classic chicken and egg problem. These changes will support GSaaS business models, which in turn will increase access to the infrastructure needed by space companies small and large.[7]
- Second, we expand the list of license modifications that do not require prior authorization. For earth stations, we remove the overly restrictive "electrically identical" language in our prior rules. Geostationary orbit (GSO) satellites no longer will be required to file for special temporary authority (STA) for relocation during drift, so long as certain conditions are satisfied. And for NGSO satellites, we no longer require prior authorization for certain minor changes, which previously became effective only once acted upon by the Commission. Such changes now will become effective in most cases upon 60 days notification to the Commission. These actions will free operators to make certain system changes without the burden of regulatory paperwork or waiting for Commission action.
- Third, we eliminate the outdated requirement to retain paper copies of applications. Our prior rules included a requirement that operators print and retain a paper copy of the International Communications Filing System (ICFS) application for their files.

(Continued from previous page)
https://www.weforum.org/publications/space-the-1-8-trillion-opportunity-for-global-economic-growth/; Global Satellite Operators Association, The Socio-Economic Value of Satellite Communications (2025), https://gsoasatellite.com/wp-content/uploads/GSOA-VVA_LSTelcom_Socio-Economic-Value-of-Satcom_Final_FINAL-en.pdf.

[5] *See Expediting Initial Processing of Satellite and Earth Station Applications*; *Space Innovation*, IB Docket Nos. 22-411 and 22-271, Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 8838 (2023) (*First Report and Order*).

[6] In this case, a "satellite point of communication" is used to mean a satellite system that will be used to transmit or receive radiofrequency signals to or from one or more antennas on the Earth (i.e. earth station(s)).

[7] GSaaS refers to an emerging business model in which third-party earth station operators offer satellite operators and their customers access to earth station infrastructure on a pay-per-use basis. Doing so offers additional flexibility to satellite operators, who gain access to a global earth station network without needing to own and operate their own individual earth stations. Other value-added services may also be included. According to one commenter, "[U]nder the GSaaS model, ground station operators provide non-geostationary-satellite orbit, fixed satellite service ("NGSO FSS") satellite operators with access to a global, managed ground station network that is connected to a cloud platform. This is especially valuable for satellite operators providing remote sensing services as it provides a widely distributed network for rapid tasking and downlinking of payload data." Microsoft Comments at 3.

- Fourth, we adopt expanded timeframes to file license renewal applications for earth stations and space stations. The prior rules had two different filing windows for earth station and NGSO space stations, each of which was early in the license term.
- Fifth, we change the default *ex parte* status of all applications to "permit-but-disclose." Changing the default *ex parte* status will eliminate the need to change the status for each individual application where broad public participation is desired.
- Sixth, we provide non-U.S. licensed market access grantees the ability to receive a grant of special temporary access.[8] Under prior rules, which did not allow for STA for market access grantees, such changes were required to be made through a modification.
- Lastly, we adopt a 30-day shot clock for earth station renewal applications. Prior rules had no such deadline for Commission action, resulting in a backlog of earth station renewal applications.

4. Through a bias towards permissionless innovation, we are eliminating barriers to a range of services: broadband connectivity to rural communities, direct-to-device services in remote areas beyond the reach of terrestrial wireless service, Internet of Things applications, and new applications of space-supported technology. Unleashing these new technologies and services will help every community get a fair shot at the opportunities that come from greater connectivity.

II. BACKGROUND

5. In September 2023, the Commission adopted the *First Report and Order* and *Further Notice of Proposed Rulemaking* (*FNPRM*).[9] In the *FNPRM*, the Commission sought comment on additional streamlining measures.[10] First, the Commission sought comment on eliminating outdated, unnecessary and burdensome requirements, including the requirement for operators to maintain paper copies of electronically filed applications, and whether to change the default status of space and earth station proceedings to "permit-but-disclose" under the *ex parte* rules.[11] The Commission also sought comment on several proposals to promote efficiency, including: (1) expanding the list of modifications not requiring prior authorization, (2) allowing market access for operators by permitting applicants to obtain the equivalent of STAs, (3) allowing operators to file STA extensions concurrently with the initial STA application, (4) expanding the window for operators to file renewal applications for existing licenses, and (5) exploring the feasibility of creating a Permitted List for NGSO operations.[12] Additional

[8] Throughout this Order, we use the terms "space station," "satellite," and "spacecraft." "Space station" is defined in the Commission's rules as "[a] station" located on an object which is beyond, is intended to go beyond, or has been beyond, the major portion of the Earth's atmosphere." 47 CFR §§ 2.1, 25.103. This is consistent with terminology used by the International Telecommunication Union (ITU). *See* ITU Radio Regulations (R.R.) 1.64. The Commission's rules define "satellite" as "[a] body which revolves around another body of preponderant mass, and which has a motion primarily and permanently determined by the force of attraction of that other body." 47 CFR § 2.1. In this document, the term "satellite" refers only to artificial satellites. The Commission's rules define "spacecraft" as "a man-made vehicle which is intended to go beyond the major portion of the Earth's atmosphere." 47 CFR §§ 2.1, 25.103. These terms are used interchangeably in this Order, recognizing that part 25 of our rules is titled, "Satellite Communications," and that "satellite" is a more commonly understood term than the technical definition of "space station" in our rules. We observe that "satellite" and "spacecraft" are more broadly defined than "space station."

[9] *See First Report and Order,* 38 FCC Rcd at 8838-75, paras. 9-86.

[10] *Id.* at 8876-87, paras. 88-113.

[11] *Id.* at 8884-87, paras. 111-13.

[12] *Id.* at 8876-80, 8885, paras. 89-97, 101. The term "Permitted List" is defined as "[a] list of all U.S.-licensed geostationary-orbit space stations providing Fixed-Satellite Service in the conventional C band, the conventional Ku band, or the 18.3-18.8 GHz, 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.25-30.0 GHz bands, as well as non-U.S.-licensed geostationary-orbit space stations approved for U.S. market access to provide Fixed-Satellite Service in the (continued….)

measures upon which the Commission sought comment include: (1) streamlining the Commission's internal and inter-agency coordination process, (2) eliminating potentially duplicative coordination for space and earth station applications, (3) expanding conditions under which earth station operators may access the streamlined "deemed granted" process for adding points of communications, and (4) limiting timeframes for the Commission to take action on license applications.[13] Finally, the Commission proposed to revise its existing rules to facilitate new modes of business by permitting earth station operators that do not yet have a specified satellite point of communication to apply for a limited license under certain conditions.[14] In response to the *FNPRM,* the Commission received fourteen comments, twelve reply comments, and multiple *ex parte* submissions.[15]

III. DISCUSSION

6. In this Order, we revise our part 25 satellite communications rules and take a number of steps to reduce regulatory burdens on applicants and licensees.

A. Establishing Earth Station Baseline Licensing and Modified Procedures for Adding Points of Communication for All Licensees

7. Under the Commission's rules, applicants seeking authorization to operate an earth station must identify "either the specific satellite(s) with which it plans to operate or the eastern and western boundaries of the arc it plans to coordinate."[16] In the *FNPRM*, the Commission sought comment on its proposal to allow earth station operators to apply for and receive a limited license without first identifying a satellite point of communication under the condition that the license will require modification prior to operations with a specific point of communication, unless the point of communication is on the Permitted List and the operations fit within the parameters specified therein.[17]

8. We revise our rules to permit applicants seeking authority to operate an earth station to apply for and receive a "baseline license" [18] without first identifying the specific satellite(s) with which it plans to operate.[19] Applicants will now be permitted to either submit their initial application with or without an identified point of communication. Applicants who do not include a point of communication with their initial application, however, will need to add a point of communication prior to communicating with any satellite, following the process we establish here today. Removing this regulatory barrier and

(Continued from previous page)
conventional C band, conventional Ku band, or 18.3-18.8 GHz, 19.7-20.2 GHz, 28.35-28.6 GHz, and 29.25-30.0 GHz bands." 47 CFR § 25.103 (Definitions).

[13] *Id.* 8880-81, 8882-85, paras. 98-99, 102-10.

[14] *Id.* at 8881-82, para. 100.

[15] *See infra* Appx. C.

[16] 47 CFR § 25.115(a)(5)(i).

[17] *First Report and Order*, 38 FCC Rcd at 8881-82, para. 100.

[18] *See* Microsoft Comments at 7-8. Instead of designating this license as a "limited license" as originally proposed, we will use the term "baseline license." A commenter disagrees with the characterization of this license type as "limited," and we are persuaded by these concerns. *See id.* at 7-8. The term "baseline" more appropriately describes the license as an initial step. The terms also avoids confusion with regular licenses because operators obtaining these licenses are not, in fact, authorized to communicate without an identified point of communication, which will be added at a later date.

[19] *See infra* Appx. A. (modifications to our rules pursuant to this section are captured in § 25.115(a)(5)(i) and 25.118(g)). In addition, we address the proposal to allow operators to change their points of communication pursuant to part 25.118 of our rules and updated 47 CFR § 25.118(a)(3) to remove the current limitations regarding when an operator may add a point of communication via notification to the Commission.

permitting a new baseline license should allow GSaaS operators to be more agile, while also potentially lowering barriers to entry for newer entrants in the space economy.[20]

9. To obtain a baseline license, applicants must provide all other information as required by the Commission's rules for applications for authority to operate an earth station, except for listing an identified point of communication.[21] If the application is granted, a license will then be generated with a place-holder for the identified point(s) of communication field, which the applicant must later modify to add one or more identified points of communication prior to operating. Satellite points of communication must be added in accordance with the process described below before an earth station may communicate with a satellite system.[22]

10. In conjunction with allowing applicants to file an application for a baseline license without a specified point of communication, we adopt a modified method for licensees to add a subsequent point of communication. Specifically, earth station operators must provide notice to the Commission by filing in ICFS FCC Form 312 and Schedule B pursuant to section 25.118 of our rules.[23] By filing notice, earth station operators certify that: (1) the operator has permission from the satellite operator to communicate with the satellite system; (2) the operator is not repointing the earth station's antenna beyond any coordinated range; (3) adding a point of communication does not result in an increased risk of harmful interference;[24] (4) the operator does not request any change to authorized frequencies; and (5) the operator does not request to communicate with a satellite that does not have market access.[25] The licensee will be permitted to begin operations with the new point(s) of

[20] *See, e.g.*, Microsoft Comments at 2 ("The current requirement for earth station license applications to identify at least one point of communication also presents additional, unnecessary regulatory obstacles, especially for GSaaS providers.").

[21] As noted below, applicants continue to be subject to any rules and application requirements, including coordination, relating to operations in frequency bands shared with terrestrial or federal users. *See, e.g.*, 47 CFR § 25.136. CTIA requests that the Commission exclude bands shared with UMFUS from the new baseline licensing procedures. In the alternative, CTIA requests that the Commission explicitly incorporate section 25.136 in the rules to remind licensees that they must follow the requirements of section 25.136 *See* Letter from Michael Mullinix, Vice President, Regulatory Affairs, CTIA to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed July 30, 2025). We are not convinced that a reminder in section 25.118 about compliance with section 25.136 or other rules is necessary. Adding such verbiage also runs counter to the Commission's efforts to eliminate unnecessary or duplicative rules and streamline our processes. *See* Letter from Michael J. Carlson, Senior Corporate Counsel, Kuiper Systems, LLC, to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed July 31, 2025)

[22] 47 CFR § 25.276. A licensee must comply with 47 CFR § 25.276 and may not communicate with a satellite system that is not listed as a point of communication on their license. Therefore, licensees granted a license without an identified point of communication must add a point of communication under the procedures adopted here today before the licensee may communicate with one or more satellites or satellite systems.

[23] *Id.* § 25.118(a) (permitting earth station licensees to make certain modifications without prior authorization so long as the licensee provides notice to the Commission using FCC Form 312 and Schedule B within 30 days of the modification).

[24] Licensees remain subject to the Commission's rules requiring coordination with other potentially affected licensees in shared frequency bands. *See, e.g.*, *id.* §§ 25.136(a)(4)(iv), 25.136(c)(4), 25.136(d)(4)(iv), 25.136(e)(4)(iv) (requiring successful coordination with UMFUS licensees in a variety of frequency bands) and 101.103(d)(1) (requiring that the operator notify potentially affected licensees directly, that they be allowed 30 days to respond, and that coordination be completed prior to filing). In addition, applicants seeking waiver of the Commission's rules are not eligible for this notification process due to the prior requirement for a Commission decision on the waiver request.

[25] *See infra* Appx. A (revising 25.115(a)(5)(i) and adding § 25.118(g) accordingly). Note that a separate certification is not required; by submitting the notice, the applicant is certifying that they meet the conditions laid out herein.

communication immediately upon both filing notice of the change pursuant to section 25.118 of our rules, and payment of the filing fee.[26] Although several parties have requested the Commission exclude bands shared with terrestrial operations or bands subject to specific sharing requirements, we decline to do so.[27] We find that this process affords maximum flexibility, while still ensuring that other operators in shared bands, such as Upper Microwave Flexible Use (UMFUS), Iridium and federal operators, remain protected under the rules from harmful interference.[28]

11. Finally, licensees will be subject to a 15-day evaluation period that will permit the Space Bureau (Bureau) to remove a newly added point of communication if the point of communication would violate the conditions discussed herein and set forth in section 25.118(g) of the Commission's rules.[29] In that case, the Bureau will provide notice to the licensee that the newly added point of communication was removed and is no longer authorized for use, and will provide an explanation as to why the point of communication is in violation of the Commission's rules.[30] The licensee must terminate operations using the new point of communication immediately. Any violations of the Commission's rules discovered during or after the expiration of the 15-day evaluation period may be addressed via an enforcement action.[31]

12. The record on the proposal to create a limited license option is mixed. Some commenters support issuing a limited license only if the Commission is able to navigate the various existing licensing requirements,[32] while others argue there are no clear benefits and that permitting such a license would result in additional administrative burdens.[33] But commenters generally agree with permitting expanded access to expedited treatment for adding points of communication.[34] Upon review of the record, we are persuaded that the initial proposal would have created new burdens and would not have solved the regulatory burdens of adding a point of communication.[35] Other proposals suggesting the Commission receive no notice of an update to the point of communication or ability to review the notice for

[26] 47 CFR § 25.118(a); *see also id.* § 25.110.

[27] *See* Letter from Joseph A. Godles, Attorney for Iridium Communications Inc., Iridium Communications Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed July 24, 2025); *see also* Letter from Michael Mullinix, Vice President, Regulatory Affairs, CTIA to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed July 30, 2025).

[28] *See FNRPM*, 38 FCC Rcd at 8881-82, para. 100.

[29] *See infra* Appx. A.

[30] In this notice, which will appear in the Bureau's weekly "Earth Station Actions Taken" Public Notice, the Bureau will provide a brief explanation of the deficiency and/or violation of section 25.118(g).

[31] Operators choosing to commence service during this evaluation period do so at their own risk. For example, communications during the evaluation period with a foreign satellite without U.S. market access would violate section 25.118(g) and thus may be subject to enforcement action. We delegate authority to the Bureau, after notice and comment to the extent required or desired, to release instructions after the new rules adopted here are effective on how pending applications to add a point of communication will be able to take advantage of this new process.

[32] *See* Microsoft Comments at 7-8; Verizon Reply at 2-4; Mangata Reply at 10; ViaSat Comments at 8.

[33] *See* SIA Comments at 6-7; Intelsat Comments at 3-4; Eutelsat Group Reply at 9; Iridium Comments at 1-3.

[34] *See* AWS Comments at 5; Spire Comments at 9-10; SpaceX Comments at 10-11; Microsoft Comments at 4-6; SIA Comments at 9; Eutelsat Comments at 11; Microsoft Reply at 2-3; Eutelsat Reply at 6; Intelsat Reply at 6-7. *But see* Iridium Reply at 1-2.

[35] *See* Intelsat Comments at 3-4 (arguing that the proposal would actually add steps to the process and was too narrow to be effective); Iridium Comments at 3 (arguing that the proposal in the *FNPRM* would not improve flexibility and it should not be considered for bands requiring coordination).

conformance with the Commission's rules would remove necessary oversight.[36] The proposal we adopt strikes the right balance between improving regulatory efficiency and fostering innovation while still affording the Commission and the public notice of the change and preserving the Commission's ability to maintain oversight.[37]

B. Earth Station Licensing Adding Points of Communication Under Section 25.117

13. Under current Commission rules, an application to modify an earth station license by adding a space station point of communication will be deemed granted 35 days after public notice if it meets certain parameters.[38] In the *FNPRM*, the Commission sought comment on whether and how to expand access to the process established in section 25.117(i) to a broader universe of operators, and on whether it would be possible to extend this process in any of the bands that require coordination.[39] Given the expedited process we establish in this Order by permitting earth station operators to add new identified points of communication without prior authorization,[40] we find the procedures established in section 25.117(i) are no longer necessary. Specifically, because the procedures adopted in 25.118(g) will simultaneously expand access to an expedited process of adding a point of communication while also protecting other spectrum users and ensuring that licensees adding points of communication coordinate with affected users as required by our rules.[41] Accordingly, we eliminate section 25.117(i) in its entirety and find that the procedures we adopt today in section 25.118(g) better promote efficiency because Commission resources will no longer be spent processing applications that merely seek to add a new point of communication. In addition, this change will eliminate regulatory burdens on applicants, which will no longer need to file an application simply to add points of communication. As a result the section 25.117(i) procedures and the proposed expansion are unnecessary. Therefore, we remove section 25.117(i) and instead adopt the revisions to section 25.118(g) discussed above.[42]

14. Generally, commenters support the approach of including more spectrum bands in the

[36] *See* SpaceX Comments at 10-11; Microsoft Comments at 4-6.

[37] All licensees may avail themselves of the provisions adopted in section 25.118(g) without regard to whether they are a new licensee or an existing licensee with an existing identified point of communication, or whether they specify a point of communication in their initial application. To better afford the public notice of the changes, and to address the concerns raised by Iridium, we delegate to the Bureau authority to establish procedures to issue a weekly public notice listing notifications filed pursuant to this new rule part. *See* Letter from Joseph A. Godles, Attorney for Iridium Communications Inc., Iridium Communications Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed July 24, 2025). We delegate to the Bureau authority to determine how and what day to release the public notice and to determine what information is included in the public notice.

[38] *See* 47 CFR § 25.117(i) (providing that "an application to add a space station point of communication to an earth station authorization will be deemed granted 35 days after the date of the public notice that the application has been accepted for filing, provided: (1) the license modification is limited to adding one or more points of communication, (2) the modification will not cause the earth station transmissions to exceed the highest EIRP, EIRP density, and bandwidth prescribed for any already authorized emission; and (3) the new space station point of communication will operate with the earth station only in frequency bands that are not shared with Federal or terrestrial wireless users and are not subject to coordination requirements with other non-Federal satellite services").

[39] *See FNPRM*, 38 FCC Rcd at 8884-85, paras. 109-10.

[40] *See supra* para. 9; *see also infra* para. 19.

[41] *See infra* Appx. A.; *see also* Iridium Reply Comments at 1-2 (stating that if the Commission adopts any proposal to expand access to expedited treatment for adding points of communication, it should preserve the special requirements for certain frequency bands).

[42] *See supra* para. 9; *infra* Appx. A; *see also infra* para. 19.

section 25.117(i) process.[43] We agree with this premise but find that permitting earth station operators to add new points of communication under the 25.118(g) process we establish in this Order is better suited to the goal of eliminating regulatory burdens and promoting efficiency. Specifically, the approach we adopt in 25.118(g) establishes limits on when and how a licensee can add a point of communication while still requiring that licensees seeking to add a point of communication coordinate with other affected users as needed, the new approach adopted in 25.118(g) will both ease regulatory burdens and protect other spectrum users.[44]

C. Expanding the List of Modifications Not Requiring Prior Authorization

15. The current rules specify circumstances under which an operator can make modifications to its existing license without prior authorization. Depending on the nature of the modification, the operator may be required to notify the Commission of the change within 30 days after the modification,[45] notify the Commission in advance of making the change,[46] or make the change without notifying the Commission.[47] In the *First Report and Order*, the Commission sought comment on whether to expand the list of modifications not requiring prior authorization and, if the Commission were to expand the list, what notification process should operators be required to follow.[48]

16. *Modifications to Earth Station Equipment Pursuant to Section 25.118(b)(1)*. Section 25.118(b)(1) allows equipment in an authorized earth station to be replaced without prior authorization and without notifying the Commission "if the new equipment is electrically identical to the existing equipment."[49] In the *FNPRM*, the Commission sought comment on whether to expand upon the list of minor modifications that can be made by operators without prior authorization, including those identified in section 25.118(b).[50] We change our rules to remove the language requiring equipment to be "electrically identical" and remove 25.118(b)(1) in its entirety[51] Although undefined in part 25, the term "electrically identical" has been used in part 2 equipment authorization procedures to mean equipment

[43] We agree with commenters that increasing the ability to add points of communication for earth station operators is necessary to promote efficiency and remove regulatory burdens.

[44] *See, e.g.*, Verizon Reply Comments at 2 ("But in others, where the modification may have an impact on the interference environment—such as adding a point of communication or changing antenna parameters—such proposed modifications should not be made without allowing interested parties the opportunity to review and comment."); Iridium Comments at 1-2 ("Procedural efficiency, though, should not override substantive rights or interests; prevention of harmful interference to licensed operations should be a paramount concern. For this reason, the Commission should exercise caution before applying new processing procedures to earth station applications that involve the use of shared bands for which coordination is required.").

[45] 47 CFR § 25.118(a).

[46] *Id.* § 25.118(e)-(f).

[47] *Id.* § 25.118(b).

[48] *See FNPRM*, 38 FCC Rcd at 8876-78, paras. 89-91. Commenters generally support the expansion of minor modifications not requiring prior authorization. *See* Intelsat Comments; Spire Comments at 3-5; SpaceX Comments at 10-11; Myriota Comments at 2; Viasat Comments at 2; SIA Comments at 2; Eutelsat Group Comments at 7-9; TechFreedom Reply at 7; Microsoft Reply at 6; Mangata Reply at 6; Eutelsat Reply; Intelsat Reply; Astroscale Reply at 1-2; SES Reply; SpaceX Reply at 4. Some commenters, however, urged caution or opposed expanding the list of minor modifications not requiring prior authorization. *See* Verizon Reply at 2-3; Viasat Reply at 1-2; CTIA Ex Parte at 2.

[49] 47 CFR § 25.118(b)(1).

[50] *See FNPRM*, 38 FCC Rcd at 8876, para. 89 & n.276.

[51] *See infra* Appx. A.

that is marketed under different names but is otherwise identical.[52] This parameter is overly restrictive as applied to part 25. As a practical matter, unless the replacement earth station equipment will increase harmful interference or increase the radiation risk to humans beyond levels permitted by our rules, prior authorization or notification is unnecessary. Accordingly, we delete 25.118(b)(1) and revise 25.118(b)(2) to allow earth station operators to replace equipment without prior authorization and without notifying the Commission provided the replacement equipment does not involve a change enumerated in 25.118(b)(2) or increase the radiation risk to humans beyond the limits established in section 25.115(p)[53] and the earth station operator does not claim additional interference protections. This revision to section 25.118(b)(2) allows operators the flexibility and predictability to change equipment so long as it is not a change expressly enumerated in the rules as being impermissible without an application. Although some commenters oppose overly broadening section 25.118, our decision agrees with commenters who proposed broadening the scope of modifications not requiring prior authorization, including permitting modifications that will not negatively affect the interference environment. The proposal we adopt will reduce regulatory burdens without creating negative impacts to other users or causing a harmful change in the interference environment.[54]

17. *NGSO Modifications, Notification Required.* We will allow NGSO space station operators to modify without prior authorization, upon 60 days prior notice to the Commission, the antenna, sensor or microelectronics, provided that the changes do not cause: (1) an increase in the transmit power, effective isotropic radiated power (EIRP), EIRP density, out-of-band emissions, or a change in the antenna pattern(s), or a change in the antenna gain characteristics beyond the technical parameters specified in the underlying authorization;[55] (2) a change in the area-to-mass ratio of the satellite; (3) an increase in the in-orbit collision risk; (4) an increase in the re-entry risk; (5) an increase the risk of in harmful interference to other system(s); or (6) an increase in the need for harmful interference protection for the system.[56]

---

[52] See 47 CFR § 2.924 ("[A] device will be considered to be electrically identical if no changes are made to the authorized device….").

[53] *See* Letter from Jameson Dempsey, Director, Satellite Policy, Space Exploration Technologies Corp. to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 28, 2025). *See also* Letter from Michael Mullinix, Vice President, Regulatory Affairs, CTIA to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 30, 2025) (proposing that the Commission delete 25.118(b)(1) given the overlap between 25.118(b)(1) and 25.118(b)(2)); Letter from Michael J. Carlson, Senior Corporate Counsel, Kuiper Systems, LLC, to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 31, 2025).

[54] *See* Spire Comments at 3-5; SpaceX Comments at 10-11; Viasat Comments at 2; Astroscale Reply at 1-2; Eutelsat Group Reply at 4; Mangata Reply at 6; TechFreedom Reply at 7. We note, however, that some commenters urged caution or opposed expanding the list of minor modifications not requiring prior authorization. *See* Viasat Comments at 2; SIA Comments at 2; Verizon Reply at 2-3; Viasat Reply at 1-2; CTIA Ex Parte at 2.

[55] A space station operator is permitted to make changes within the technical parameters outlined in its authorization. However, any increase in the operating parameters (*e.g.*, transmit power, EIRP, EIRP density, out-of-band emissions) or changes in the antenna pattern(s) or antenna gain characteristics beyond what is already authorized may require new or modified ITU filing(s) and new coordination agreements(s) given the increased interference potential as a result of these changes. Therefore, we will continue to require licensees to apply to modify their licensees if they are seeking to increase any of their already authorized operating parameters. *See* Letter from Jameson Dempsey, Director, Satellite Policy, Space Exploration Technologies Corp. to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 28, 2025); *see also* Letter from Kara Azocar, Vice President Regulatory & Public Policy, Iridium Communications Inc. to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 30, 2025).

[56] *See infra* Appx. A. We decline to permit NGSO space station operators to modify the area-to-mass ratio of the satellite because any change to this parameter will necessarily change the orbital debris analysis currently governed by section 25.114(d). *See* 47 CFR § 25.114(d). Regarding harmful interference risk to other systems, SpaceX asked the Commission, in order to guide operators, to clarify that "modifications falling within the newly adopted NGSO-

(continued….)

18. The *FNPRM* sought comment on expanding the list of minor modifications that can be made by NGSO space station operators without prior authorization by the Commission.[57] In response to the Commission's request for comment, one commenter proposed to permit NGSO space station operators to notify the Commission of any changes to the size or mass of the satellite form factor, and changes to equipment and sensors that do not involve: (1) an increased risk of harmful interference to other systems not permitted by coordination agreements, (2) a request for increased interference protection, (3) an increased risk of causing orbital debris, or (4) a change in orbital altitude unless it meets the criteria otherwise provided by section 25.118 of the Commission's rules.[58] Other commenters supported this proposal.[59]

19. We adopt this commenter's proposal with some modifications to further our goals of providing operators with flexibility and reducing administrative burdens while still ensuring that we retain oversight over important technical details of the satellite system. In addition, the changes we permit here allow an operator to make modifications to their system as newer, more efficient technology is developed. Further, we will require 60-days' notice prior to the change to allow Commission staff the opportunity and time to review the proposed modification, and if needed place the modification on public notice. This 60-day timeframe, as opposed to a shorter timeframe, ensures that if the modification is placed on public notice, there is sufficient time for comment, Commission review, and for the operator to make the change.[60]

20. *Removal of Satellite Points of Communication*. In the *FNPRM*, the Commission sought comment on a suggestion from commenters to allow earth station operators to remove authorized points of communication without prior authorization.[61]

21. We adopt the proposal to permit earth station operators to remove points of communication without prior authorization via notifying the Commission of the change within 30 days of

(Continued from previous page)
NGSO protection criteria and applicable technical rules- e.g., limits to protect terrestrial and out-of-band operations- would not cause harmful interference and therefore would not increase the risk of harmful interference." *See* Letter from Jameson Dempsey, Director, Satellite Policy, to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 28, 2025). These differences were not addressed in that narrowly-focused proceeding, and the record before us is insufficient to address whether the protection criteria established in that proceeding would be sufficient to protect all operations in all bands. *See* Letter from Jameson Dempsey, Director, Satellite Policy, Space Exploration Technologies Corp. to Marlene H. Dortch, Secretary, FCC, IB Docket Nos. 22-411, 22-271 (filed Jul. 28, 2025). *See generally Revising Spectrum Sharing Rules for Non-Geostationary Orbit, Fixed-Satellite Service Systems*, IB Docket No. 21-456, Second Report and Order and Order on Reconsideration, 39 FCC Rcd 12656 (2024).

[57] *FNPRM*, 38 FCC Rcd at para 89-90. These proposals included permitting earth station operators to remove satellite points of communication and modification of antenna identification without prior authorization.

[58] *See* Spire Comments at 4. Other commenters offered similar proposals to expand significantly the category of minor modifications without prior authorization, but these proposals offered maximum operator flexibility and discretion without sufficient Commission regulatory oversight.

[59] We note that some commenters expressed support for this proposal on the record. *See* SES Reply at 4 (supporting the Spire proposal so long as the alterations do not increase the risk of harmful interference, cause orbital debris, or require additional protections); *see also* Intelsat Reply at 2 and 8 (supporting Spire's proposal).

[60] We delegate to the Bureau the authority to adjust public notice and other deadlines on a case-by-case basis to meet this 60-day period, or to adopt specific deadlines (after notice and comment to the extent required or desired) for all such modifications consistent with the 60-day period, to ensure efficient processing and review of these modifications.

[61] *FNPRM*, 38 FCC Rcd at 8876-77, para. 89.

the modification pursuant to section 25.118 of our rules.[62] We find that requiring notification of the change within 30 days of the modification is necessary because removing a point of communication requires Commission staff to revise and reissue a license. Accordingly, requiring notification will allow Commission staff to update the license and ensure the license accurately reflects which points of communication an individual earth station is permitted to communicate with.[63]

22. There is general support on the record to permit earth station operators to remove points of communication without prior authorization.[64] We find that providing earth station operators the flexibility to remove points of communication without prior authorization will promote efficiency and reduce regulatory burdens as well as ease administrative burdens on the Commission, allowing it to dedicate staffing resources to other priorities.

23. *Modification of Earth Station Antenna Identification*. In the *FNPRM*, the Commission sought comment on a suggestion from commenters to permit earth station operators to modify antenna identification without prior authorization.[65] We adopt the proposal to permit earth station operators to modify antenna identification without prior authorization or notification to the Commission.[66] We find that permitting earth station operators to modify antenna identification without notice to the Commission or prior authorization is appropriate because such a change is purely administrative and clerical, and does not require Commission review as there is no standard procedure for antenna identification conventions.[67] We note that if the applicant does require the license be updated to reflect the new antenna identification, then an applicant can seek a modification pursuant to section 25.118(a) of the Commission's rules, or can choose to inform the Commission as part of any other application associated with the license such as renewal or modification. This action will allow Bureau staff to update the license to reflect the changed antenna identification should the applicant wish.[68]

24. Commenters agree with the proposal to permit earth station operators to modify antenna identification without prior authorization.[69] We concur and find that providing earth station operators the flexibility to modify antenna identification without prior authorization or notice to the Commission will promote efficiency and ease administrative burdens, allowing the Commission to dedicate staffing resources to other priorities. Some commenters proposed including all "administrative changes" as

---

[62] Notification to the Commission is required to inform staff so they may make changes to Commission databases to reflect accurate points of communications for earth stations.

[63] We reflect this change to our rules in 47 CFR § 25.118(a)(3).

[64] *See* Intelsat Comments at 7; Spire Comments at 3-5; SIA Comments at 2;Viasat Comments at 2; Eutelsat Group Reply at 4; Intelsat Reply at 2; Microsoft Reply at 6; TechFreedom Reply at 7; Verizon Reply at 2-3; Viasat Reply at 1-2.

[65] *FNPRM*, 38 FCC Rcd at 8876- 77, paras. 89-90.

[66] We adopt this proposal at 47 CFR § 25.118(b)(3) of our rules.

[67] Antenna identification is a required portion of the FCC Form 312 Schedule B as a means to identify and accurately match information found in table B4 of the Schedule B with other information found throughout the Schedule B. As indicated in the Notes of the Schedule B, the naming convention used in the antenna identification field is subject to the applicant's discretion so long as the naming convention selected is consistent throughout the Schedule B.

[68] We note that applicant and licensee contact information is also administrative and clerical in nature and therefore can be updated in a similar manner. However, applicants and licensees must maintain accurate contact information for licenses as required by the Commission's rules. *See, e.g.*, 47 CFR §§ 25.171(b), 25.228(e), 25.228(g), 25.271(c)(5).

[69] *See, e.g.*, Intelsat Comments at 7; Spire Comments at 5; SIA Comments at 2; Viasat Comments at 2; Eutelsat Group Reply at 4; Intelsat Reply at 2; TechFreedom Reply at 7; Verizon Reply at 2-3.

modifications not requiring prior authorization or notice to the Commission.[70] We decline to allow for all administrative changes to be included as modifications not requiring prior authorization or notice to the Commission because our rules do not define "administrative changes" from other types of changes. Instead, we remind applicants that a modification requires prior Commission approval under section 25.117 if it does not fall under one of the provisions in section 25.118 specifying modifications that do not require prior approval.

25. *Modification of Space Station Antenna Parameters*. In the *FNPRM*, the Commission sought comment on a proposal from a commenter to permit NGSO space station operators to modify antenna parameters without prior authorization so long as those changes fall within the authorized parameters of the satellite system and the operator provides notice to the Commission after the modification is made.[71] Most commenters support the proposal to permit NGSO space station operators to modify antenna parameters without prior authorization,[72] though some disagree citing the increased potential for interference.[73] Rather than permitting operators to make the change prior to notification to the Commission, we instead allow changes to antennas, sensors, or microelectronics to be made to NGSO systems without authorization, upon 60 days prior notice to the Commission, as outlined herein.[74] We find that other actions we take today to allow NGSO operators to make certain changes without prior authorization and upon notice to the Commission[75] strike an appropriate balance between ensuring efficiency and reducing unnecessary regulatory burdens on operators, and ensure that operators are protected from harmful interference.

26. *GSO Operations During Relocation*. In the *FNPRM*, the Commission sought comment on a proposal from a commenter to permit operations beyond telemetry, tracking and command functions (TT&C) to continue during GSO satellite relocation drifts so long as the operator certifies that the "operations are limited to coordinated transmissions during the relocation and drift transition period."[76] We adopt the proposal to permit GSO operators to continue operations during relocation and drift subject to certain conditions.[77] Specifically, operations must be on an unprotected, non-harmful inference basis and all operations must be coordinated with any existing GSO space station.[78]

27. Some commenters argue in favor of this approach,[79] while others oppose modifying the

[70] *See* Spire Comments at 3-5; SpaceX Reply at 4.

[71] *FNPRM*, 38 FCC Rcd at 8876-77, paras. 89-90.

[72] *See* Eutelsat Group Comments at 9; Myriota Comments at 2; Spire Comments at 4-5; Mangata Reply at 6; SpaceX Reply at 4.

[73] *See* Viasat Reply at 3.

[74] *See supra* paras. 17-18 ("We will allow NGSO space station operators to modify without prior authorization, upon 60 days prior notice to the Commission, the antenna, sensor or microelectronics, provided that the changes do not cause: (1) an increase in the transmit power, effective isotropic radiated power (EIRP), EIRP density, out-of-band emissions, or a change in the antenna pattern(s), or a change in the antenna gain characteristics beyond the technical parameters specified in the underlying authorization; (2) a change in the area-to-mass ratio of the satellite; (3) an increase in the in-orbit collision risk; (4) an increase in the re-entry risk; (5) an increase the risk of in harmful interference to other system(s); or (6) an increase in the need for harmful interference protection for the system.")

[75] *See id*.

[76] *FNPRM*, 38 FCC Rcd at 8877-78, para. 91 (citing Intelsat Comments to the Notice of Proposed Rulemaking at 12).

[77] *See infra* Appx. A (relevant language contained in section 25.118(e)).

[78] *See infra* Appx. A (relevant language contained in section 25.118(e)(4)).

[79] *See* Intelsat Comments at 7; Astroscale Reply at 1-2 (stating that including non-TT&C transmissions during relocation or drift would be a benefit for in-space servicing, assembly, and manufacturing operators).

existing rules because an STA or a waiver is available to operators seeking to continue satellite operations during GSO relocation.[80] While we recognize an STA or waiver is available to operators seeking to continue satellite operations during relocation, we disagree with commenters that this weighs against modifying our existing rules. We find that the actions we take today will promote efficiency by reducing unnecessary regulatory burdens on operators. There is minimal risk of interference in allowing GSO operations beyond TT&C during relocation, given that operations in different locations for a GSO are already authorized by the Commission.

28. *Repositioning of NGSO Space Stations.* In response to the Commission's request for comment on whether and how to expand the list of modifications not requiring prior authorization, one commenter suggested permitting NGSO space station operators to make modifications to their orbital configuration or to add replacement satellites without prior authorization and subject to a reduced notice requirement.[81] We decline to adopt this proposal at this time absent a more comprehensive record, but note that this concept may be worth exploring further as part of our future modernization efforts.[82]

D. Updating Procedural Rules

29. *Eliminating Printed Hardcopies Requirement*. Under the Commission's current rules, operators must retain an original paper copy of an electronically filed Form 312.[83] In the *FNPRM*, the Commission sought comment on its proposal to eliminate the requirement for operators to retain an original paper copy of an electronically filed application.[84] We now eliminate this requirement[85] consistent with the reasoning articulated in the *FNPRM* to maximize efficiency and eliminate regulatory burdens,[86] and with the overwhelming support in the record.[87]

30. *Change of Default Ex Parte Status of Space Station and Earth Station Applications*. Under the Commission's *ex parte* rules, space and earth station applications are classified as "restricted" proceedings by default because they are applications for authority under Title III of the Communications

[80] *See* SES Comments at 2 (arguing that a streamlined regulatory framework is ill-suited for rare and more complex cases involving the operation of a satellite's communications payload during drift); Astroscale Reply at 1-2 (agreeing with SES that operations during drift should be considered through waiver requests, but noting that changes allowing operations beyond TT&C could be beneficial to in-space servicing, assembly, and manufacturing operators).

[81] *See* Eutelsat Group Comments at 7-8; Eutelsat Group Reply at 4.

[82] *See e.g.*, Brendan Carr, *Building on a Fast Start* (Apr. 30, 2025), https://www.fcc.gov/news-events/blog/2025/04/30/building-fast-start; Federal Communications Commission, *FCC Chairman Carr Announces Early Wins at Launch of Satellite Week*, https://docs.fcc.gov/public/attachments/DOC-410075A1.pdf (May 12, 2025).

[83] 47 CFR § 25.110(e) (requiring applicants to maintain a physical hardcopy of their electronically filed application).

[84] *See First Report and Order*, 38 FCC Rcd at 8885-86, para. 111.

[85] *See infra* Appx. A (removing and reserving section 25.110(e)).

[86] *See First Report and Order*, 38 FCC Rcd at 8885-86, para. 111; *see also Delete, Delete, Delete*, Public Notice, DA 25-219 (Mar. 12, 2025).

[87] *See* Eutelsat Group Reply at 9; Intelsat Comments at 8; Intelsat Reply at 2; SIA Comments at 9; Spire Comments at 12; Viasat Comments at 3; Viasat Reply at 2. As the Commission noted in the *First Report and Order*, we find that applicants are free to continue retaining hard copies if they choose. We note that although section 25.110(e) is titled "signing," the part 25 application review process is triggered by the electronic filing and electronic signing of the application in ICFS and not by the signing of a printed, hardcopy of the electronically filed application. Therefore, the elimination of this rule makes no change to the rights or procedures of the application filing or review process. Rather its elimination removes an additional procedural requirement for applicants.

Act.[88] In restricted proceedings, *ex parte* presentations, i.e. written presentations not served on the parties in the proceeding or oral presentations made without advance notice to other parties and an opportunity to be present, are prohibited.[89] In a restricted proceeding with only one party, such as an uncontested application, the sole party may freely make presentations to the Commission because there is no other party to be served or with a right to be present.[90] The Commission may modify applicable *ex parte* rules in a particular proceeding, such as a change to an application's status, if it is in the public interest to do so.[91] The Commission may also change an application's *ex parte* status for various reasons, including because the application covers the same subject area as a related rulemaking proceeding[92] or the topic to be discussed in a particular application has applicability across a wide number of applications.[93]

31. In the *FNPRM*, the Commission sought comment on its proposal to change the status of space and earth station applications, including requests for U.S. market access through non-U.S. licensed space stations, to the list of proceedings that are categorized as "permit-but-disclose" in our rules, i.e. *ex parte* presentations are permitted but must be disclosed.[94] We now amend part 1 of the Commission's rules to add "applications for space and earth station authorization, including requests for U.S. market access through non-U.S. licensed space stations" to the list of proceedings that are "permit-but-disclose" under section 1.1206(a) of our rules.[95] Because of the fast pace of change in the satellite industry and the fact that most spectrum use is shared with other users, many applications contain information important to a broad cross section of services and operations both in space and terrestrially. Thus, designating these applications as permit-but-disclose by default serves the public interest by making it easier for stakeholders to communicate with Commission staff while increasing transparency for the public.[96] As

[88] 47 CFR § 1.1208 ("Proceedings in which *ex parte* presentations are prohibited, referred to as "restricted" proceedings, include, but are not limited to, all proceedings that have been designated for hearing, proceedings involving amendments to the broadcast table of allotments, applications for authority under Title III of the Communications Act, and all waiver proceedings (except for those directly associated with tariff filings).").

[89] The Administrative Procedure Act (APA) defines "*ex parte* communication" as "an oral or written communication not on the public record with respect to which reasonable prior notice to all parties is not given, but it shall not include requests for status reports on any matter or proceeding covered by this subchapter." 5 U.S.C. § 551(14). Consistent with that definition, the Commission's rules define an *ex parte* presentation as "[a]ny presentation which: (1) If written, is not served on the parties to the proceeding; or (2) If oral, is made without advance notice to the parties and without opportunity for them to be present," with "presentation" defined as "[a] communication directed to the merits or outcome of a proceeding, including any attachments to a written communication or documents shown in connections with an oral presentation directed to the merits or outcome of a proceeding." 47 CFR § 1.1202(a)-(b); *see also id.* § 1.1208 ("Proceedings in which *ex parte* presentations are prohibited, referred to as "restricted" proceedings, include, but are not limited to, all proceedings that have been designated for hearing, proceedings involving amendments to the broadcast table of allotments, applications for authority under Title III of the Communications Act, and all waiver proceedings (except for those directly associated with tariff filings.)").

[90] 47 CFR § 1.1208 Note 1.

[91] *Id.* § 1.1200(a); *id.* § 1.1208 Note 2 ("Consistent with § 1.1200(a), the Commission or its staff may determine that a restricted proceeding not designated for hearing involves primarily issues of broadly applicable policy rather than the rights and responsibilities of specific parties and specify that the proceeding will be conducted in accordance with the provisions of § 1.1206 governing permit-but-disclose proceedings.").

[92] *Id.* § 1.1206(a)(1)-(3) (listing informal rulemaking proceedings as "permit-but-disclose proceedings").

[93] *See, e.g.*, *Satellite Licensing Division and Satellite Programs and Policy Division Information, Actions Taken*, Report No. SAT-01901 (Mar.14, 2025) (designating application proceeding as "permit but disclose" to serve public interest in resolution of broad policy issues raised by application).

[94] *See FNPRM*, 38 FCC Rcd at 8886, para. 112.

[95] *Id.*

SIA notes, the Commission frequently treats contested application proceedings as "permit-but-disclose" for these reasons.[97] Further, by changing the default status, the Commission will no longer need to devote staff resources to changing individual applications from "restricted" to "permit-but-disclose" status in circumstances warranting broader participation, and stakeholders will no longer need to petition the Commission to make this change.[98] Additionally, this change reduces the risk that new space industry entrants or entrants from other countries will inadvertently submit impermissible *ex parte* presentations in a restricted proceeding, and minimizes the expenditure of public and private resources associated with addressing inadvertent violations.[99]

32. There is general support from commenters to change the default status of space and earth station applications from "restricted" to "permit-but-disclose."[100] One commenter recommends the Commission provide guidance on the applicable rules in different proceedings in order to avoid confusion for inexperienced parties.[101] The Commission already publishes its *ex parte* rules and related information on its website, and the Bureau provides additional guidance as part of its Transparency Initiative, which is published on the Bureau website.[102]

E. Expanding Timeframes for Filing License Renewal and Replacement Applications

33. *Earth Station Renewal Window*. Under the Commission's current rules, earth station license holders may seek a renewal of their license no earlier than 90 days and no later than 30 days prior to the expiration of the license term.[103] In the *FNPRM*, the Commission sought comment on a proposal to expand the window for earth station operators to file an application for renewal from no earlier than 180 days and no later than 30 days prior to the expiration of the existing license, and on any alternatives to expand the filing window.[104] Additionally, the Commission tentatively declined to expand the renewal application period up to the license expiration date because of the increased administrative burden to Commission staff, which would increase inefficiency.[105]

34. After considering the comments submitted on this issue, we amend section 25.121(e) to expand the filing window for earth station renewal applications to allow applicants to file for renewal no

(Continued from previous page)

[96] 47 CFR § 1.1206(b). We note that as "permit-but-disclose" proceedings, applications for space and earth station authorization are nevertheless subject to the disclosure requirements applied to *ex parte* presentations in such proceedings.

[97] SIA Comments at 10.

[98] 47 CFR § 1.1200(a).

[99] *FNPRM*, 38 FCC Rcd at 8886, para. 112.

[100] *See* Intelsat Comments at 7; Myriota Comments at 4; SIA Comments at 10; Viasat Comments at 3; Eutelsat Group Reply at 9; Intelsat Reply at 2; Viasat Reply at 2. As commenters point out, this proposal would promote efficiency by reducing the labor and paperwork needed to address applicants' requests to change the status of their application.

[101] *See* SIA Comments at 10.

[102] Federal Communications Commission, *Ex Parte Rules (2011)*, https://www.fcc.gov/proceedings-actions/ex-parte/general/ex-parte-rules-2011, (last visited May 5, 2025); Federal Communications Commission, *Ex Parte Resources*, https://www.fcc.gov/proceedings-actions/ex-parte/general/ex-parte-resources (last visited May 5, 2025). *See also* Federal Communications Commission, Space Bureau, *Meet with Us*, https://www.fcc.gov/space/meet-us (last visited May 5, 2025).

[103] 47 CFR § 25.121(e).

[104] *FNPRM*, 38 FCC Rcd at 8880, para. 96.

[105] *Id.* at 8880, para. 96.

earlier than 12 months, and no later than 30 days, prior to the expiration of the existing license.[106] We agree that expanding the filing window for earth station applications allows more flexibility for operators, and will not negatively impact Commission processing.[107] Moreover, we find that requiring licensees to file a request for renewal no later than 30 days prior to the expiration of the existing license—as required under current rules— is necessary to ensure sufficient time for any necessary review[108] and to ensure that if a renewal application requires revisions or changes an applicant will be able to make those changes prior to the expiration of the license.

35. Many commenters support expanding the renewal window for earth station licenses.[109] Some commenters support the proposal to expand the timeframe to allow earth station licensees to file an application for renewal no earlier than 180 days prior to the license expiration date,[110] while other commenters suggest further expansion of the timeframe to 365 days or 12 months prior to the license expiration date.[111] We find that amending section 25.121(e) to expand the opening of the renewal filing window to 12 months before license expiration is a better option because doing so provides an ample application window to support operator flexibility while also being easy to administer.[112] Additionally, SIA proposes we eliminate the existing filing windows for earth station applications for renewal.[113] As provided above, we expand the timeframe in which a renewal application can be filed, but retain the requirement that earth station licensees file an application for renewal at least 30 days prior to the expiration of the license term.

36. *NGSO Space Station Replacement Window*. We expand the filing window for NGSO space station replacements to allow applicants to file for renewal no earlier than 12 months, and no later than 30 days, prior to the expiration of the existing license. The Commission's current rules require NGSO space station licensees to file applications for replacement no earlier than 90 days and no later than 30 days prior to the end of the 12th year of the existing 15-year license term.[114] In the *FNPRM*, the Commission sought comment on whether it should consider expanding the filing window within the twelfth year of the existing term for NGSO space station operators as another means of providing flexibility for applicants.[115] We find that a single, expanded timeframe for both earth station and space station renewals provides operators of NGSO systems with a simple and consistent set period in which

[106] *See* Intelsat Comments at 8; Eutelsat Group Comments at 10; SIA Comments at 4.

[107] Eutelsat Group Comments at 10; SIA Comments at 4; Intelsat Reply at 2.

[108] *See FNPRM*, 38 FCC Rcd at 8880, para. 96. We note that while the Commission does not routinely place earth station applications for renewal on public notice nor is it required to do so, instances may arise in which it may be necessary to place such an application on public notice. *See* 47 CFR § 25.151. As a result, retaining the requirement that earth station applications for renewal are filed by no later than 30 days prior to the expiration of the license ensures sufficient time to place the application on public notice when it is necessary. Operators who have timely filed an application for renewal may continue to operate if the license term expires prior to a final determination by the Commission subject to the requirements of 47 CFR § 1.62.

[109] *See* Intelsat Comments at 8; Eutelsat Group Comments at 10; SIA Comments at 4; Viasat Comments at 3; Spire Comments at 12; Mangata Reply at 10. No commenters opposed expanding the filing window beyond 180 days.

[110] *See* Spire Comments at 12; Viasat Comments at 3; Mangata Reply at 10.

[111] *See* Intelsat Comments at 8; Eutelsat Group Comments at 10; SIA Comments at 4.

[112] For example, the date of the window opening will be readily apparent from the license—12 months or a year before the listed expiration date.

[113] *See* SIA Comments at 4.

[114] *See* 47 CFR § 25.121(e).

[115] *FNPRM*, 38 FCC Rcd at 8880, para. 97.

they can seek renewals.[116] We are also persuaded that having a very early filing window during the twelfth year of a fifteen year license is not necessary for the review of the renewal application, especially given the steps the Bureau continues to take to reduce processing timeframes. A filing window which commences at the start of the final year of the expiration date of the license provides sufficient time for review by the Commission. As we explained in our discussion of the earth station renewal window, we require that the application be filed no later than 30 days prior to the expiration of the license to ensure sufficient time for review.

37. All commenters support expanding the filing window for NGSOs,[117] while many propose eliminating the existing window and creating a uniform, year-long window for both earth station and NGSO license renewals during the final year of the license.[118] We recognize commenters' interest in a uniform window for earth station and NGSO operators, we no longer find it appropriate to maintain two distinct renewal filing windows, establish a uniform filing window that maintains the opportunity for Commission review.[119]

38. *Market Access and Requests for STA*. We adopt our proposal to permit non-U.S. licensed satellite operators that have been granted market access to seek special temporary access pursuant to the procedures set forth in section 25.120 of our rules.[120] Non-U.S. licensed operators must first receive a grant of U.S. market access by filing a petition for declaratory ruling, including the operating parameters of the proposed system.[121] Under the current framework, U.S. satellite licensees may apply for STA to make certain changes to the operating parameters of their satellites under certain circumstances.[122] If a non-U.S. licensed satellite operator that has been granted market access seeks to make similar changes, however, the rules do not provide for the filing of an STA request and instead the operator must file the equivalent of a modification application seeking authority to operate under the requested parameters.[123] In practice, due to the inability of market access grantees to obtain STAs, each U.S. earth station licensee operating with the non-U.S. licensed satellite must request an STA to operate using the revised technical parameters while the market access grantee's modification application for approval of the changes to its operating parameters is pending. This process, however, is limited to changes to the operating parameters

[116] *See* SIA Comments at 4. Since NGSO systems are generally licensed for terms of 15 years, certain commenters advocate for the expanded timeframe to take place during the 15th year of the license. However, since the Commission retains discretion to establish an alternative license term other than 15 years, our new rule refers to the "final year of the license." Authorizations that are not eligible for renewal are excluded (e.g., NGSO satellites receiving authorizations under the small satellite and small spacecraft processes). *See* 47 CFR § 25.121(a)(3).

[117] *See* Mangata Reply at 10 (stating this would provide additional administrative flexibility for operators as they balance their internal resources dedicated to FCC licensing); *see also* Spire Comments at 12; Viasat Comments at 3.

[118] *See* Intelsat Comments at 8; Intelsat Reply at 2; SIA Comments at 4; Eutelsat Group Comments at 10; Eutelsat Group Reply at 8.

[119] See Eutelsat Group Reply at 8.

[120] 47 CFR § 25.120; *see also First Report and Order*, 38 FCC Rcd at 8878-79, paras. 92-94.

[121] *See* 47 CFR § 25.137; *see generally Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Satellites Providing Domestic and International Service in the United States*, IB Docket No. 96-111, Report and Order, 12 FCC Rcd 24094 (1997) (*DISCO II Order*).

[122] *See generally* 47 CFR § 25.120. The FCC has issued recent STAs for brief changes to operations, such as when an operator sought to communicate with a different earth station to restore services from a teleport directly affected by the wildfires in California, or when a space station operator sought to continue operations at lower altitudes while the satellite deorbits. *See, e.g.*, *Intelsat License LLC*, ICFS File No. SES-STA-20241108-02356 (granted Nov. 12, 2024); *Capella Space Corp.*, ICFS File No. SAT-STA-20241105-00252 (granted Mar. 26, 2025).

[123] 47 CFR § 25.137(e)-(f). STAs may generally be granted for immediate or temporary periods up to 180 days without public notice. *Id.* § 25.120(b). Except in certain circumstances, modifications must be filed and granted prior to any changes being made. *Id.* § 25.117(a).

related to earth station operations.

39. In the *FNPRM*, the Commission sought comment on whether to permit non-U.S. licensed space station operators that have been granted market access to request and receive an equivalent of an STA to communicate with U.S.-licensed earth stations.[124] There is general support on the record for the proposal to amend our rules to permit market access applicants to seek and receive grants of special temporary access.[125] We agree with commenters that the existing process imposes an unnecessary regulatory burden on market access grantees as well as an administrative burden on the Commission, as the end result requires each U.S. earth station licensee operating with the non-U.S. licensed space station to file individual applications seeking STA. We find that permitting market access grantees to request special temporary access will promote efficiency by eliminating the need for each U.S. earth station licensee operating with the market access grantee to request operational changes through an earth station STA request, which complicates the process for the market access grantee. Additionally, we find the action we take today will reduce the burden on Commission staff as filings to change operating parameters via earth stations must be done for each individual earth station resulting in multiple filings versus a single special temporary access for the space station. We decline, however, to allow *initial* market access via the special temporary access request because there are special considerations related to country of origin, competition, and ITU registration that must be considered before permitting a non-U.S. licensed system to access the market. Prior to seeking special temporary access, the non-U.S. licensed operator must first file a petition for declaratory ruling and receive a grant of market access pursuant to the existing procedure to obtain such grants.[126] Once a grant of market access is received, the market access grantee may make changes to its operating parameters using the special temporary access procedures we adopt today.

40. *Concurrent STA Requests*. Pursuant to the framework set forth in our rules, the Commission may grant earth and space station operators an STA for up to either 30 or 60 days in certain circumstances without public notice, or for up to 180 days if the request is placed on public notice.[127] In the *FNPRM*, the Commission sought comment on a proposal raised by commenters to permit operators to request multiple extensions of an initial 60-day STA as part of the same initial STA application.[128] The Bureau has already taken special temporary measures to expedite STA processing to a period of seven days after public notice – rather than 30 days after public notice.[129] These actions have significantly reduced the number of pending STAs, and facilitated faster processing of 180-day STAs – obviating the

[124] *See First Report and Order*, 38 FCC Rcd at 8878-79, paras. 92-94. Non-U.S. operators are not granted licenses but rather must file petitions for declaratory ruling to obtain market access authorization. *Amendment of the Commission's Regulatory Policies to Allow Non-U.S. Licensed Space Stations to Provide Domestic and International Satellite Service in the United States*, First Order on Reconsideration, 15 FCC Rcd 7207, 7212, para. 9 (1999) (adopting a procedure to allow operators of non-U.S. licensed space stations to file petitions for declaratory rulings to access the U.S. market but stating "this procedure in no way affects our *DISCO II* decision that we will not relicense non-U.S. satellites").

[125] *See generally* Eutelsat Group Comments at 2-5; Intelsat Comments at 7; Myriota Comments at 2-3; SIA Comments at 2-3; Spire Comments at 6-7; Viasat Comments at 3; Eutelsat Group Reply at 1; SES Reply at 1-2; Viasat Reply at 2.

[126] *Id.* § 25.137.

[127] 47 CFR § 25.120; *see also* 47 U.S.C. § 309(c)(2)(G), (f).

[128] *First Report and Order*, 38 FCC Rcd at 8879-80, para. 95; *see also* Intelsat Comments at 4-6; SpaceX Comments at 7-8; Eutelsat Group Reply at 9-10; SpaceX Reply at 5. *But see* Viasat Comments at 8; TechFreedom Reply at 8-10; Viasat Reply at 2.

[129] *See, e.g.*, *Space Bureau Announces Temporary Expedited Processing Procedures for Earth Station Applications Seeking Special Temporary Authority*, Public Notice, DA 25-207 (SB Mar. 10, 2025) (*Expedited Earth Station STA PN*) (temporarily expediting the processing procedures for STAs for a period of 365 days).

need for 60 day extensions in many cases. We agree with commenters that the STA process generally is in need of reexamination, and we plan to address the process holistically as part of future modernization efforts.

F. Feasibility of a Permitted List for NGSO Operations

41. Under our current rules, earth station operators may specify points of communication with authorized GSO space stations providing fixed-satellite service in certain frequency bands where GSO fixed-satellite service has primary status, under the Permitted List procedure.[130] The Permitted List allows earth stations operators to add space stations on the Permitted List as points of communication to their existing license without requiring an *application* and approval by the Commission.[131] For space stations that are not on the Permitted List and for operations that fall outside "routine" earth station technical parameters, applications to add satellite points of communication are required.[132] In the *FNPRM*, the Commission sought further comment on the feasibility of allowing earth station applicants to specify that they will communicate with certain authorized NGSO systems, similar to the existing Permitted List procedures for earth station communications with GSOs.[133]

42. We decline to adopt, at this time, a Permitted List for NGSO space stations as we do not have enough information on the record to determine whether the administrative burdens of establishing and maintaining such a list is warranted. Few commenters address this issue.[134] Some commenters raise concerns about establishing a Permitted List for NGSOs such as increased risk of aggregate interference levels, consuming available spatial look angles, and impacts to competition.[135] However, because the considerations vary based upon spectrum band, we are unable to determine at this time whether such a list is a workable solution for specific bands. There may be merit to further considering this issue as we continue our modernization initiatives.

G. Timing for Completion of Application Review

43. In the *FNPRM*, the Commission sought additional comment on implementing timeframes for application review, including whether to impose shot clocks for final action on certain types of space station or earth station applications, and relevant comparisons to other forms of timelines or shot clocks.[136] Although we find that there may be a benefit to establishing either internal or external shot clocks, we decline to pursue broad adoption at this time. We may seek further comment in a future proceeding to explore the implementation of shot clocks as needed. In any event, the actions taken today to permit earth station operators to more easily add and remove satellite points of communication,[137] permit NGSO licensees to make certain modifications without prior authorization,[138] and establish shot clocks for certain earth station renewal applications as discussed below, will reduce administrative burdens and expedite staff review of applications.[139]

---

[130] 47 CFR §§ 25.103, 25.115(k).

[131] *Id.* § 25.115(k)(1).

[132] *See id.*

[133] *See First Report and Order*, 38 FCC Rcd at 8883, para. 101.

[134] *See* SES Comments at 3; Mangata Comments at 8-9; Spire Comments at 12; Viasat Comments at 6-7.

[135] *See* Viasat Comments at 6-7.

[136] *First Report and Order*, 38 FCC Rcd at 8880-81, paras. 98-99.

[137] *See supra* paras. 19-21.

[138] *See supra* paras. 16-18; *infra* Appx. A.

[139] *See also Expedited Earth Station STA PN.*

44. Although we decline at this time to adopt broad final action shot clocks for space station and earth station applications, we do adopt a 30-day shot clock for earth station renewal applications that meet the criteria set forth here.[140] Earth station renewal applications are typically routine, and we find that establishing shot clocks for final action on these applications will promote efficiency and preserve scarce Commission resources.[141] To this end, if the Bureau does not affirmatively act on a renewal application or place it on public notice within 30 days of the application filing date and filing fee paid, the renewal will be automatically granted without further action. This 30-day shot clock does not apply to earth station renewal applications that: (1) include an application for modification; (2) make any changes to currently authorized operating parameters; or (3) seek to operate in frequency bands subject to a freeze or limitations.[142]

45. The majority of commenters oppose implementing shot clocks for final action on space station or earth station applications.[143] Of the few that support shot clocks, some commenters suggest internal review milestone shot clocks limited to sending applications to the National Telecommunications and Information Administration (NTIA) for coordination,[144] or for seeking clarification from applicants after the public notice period.[145] Other commenters suggest final action shot clocks on all types of licenses,[146] while the remainder suggest limited final action shot clocks for "routine" earth station applications[147] or for NGSOs that are outside of processing rounds.[148] As discussed above, while we recognize there may be benefits to establishing either internal or external shot clocks, the practical and technical complexities of space station and earth station licensing coupled with conflicting views from the industry warrant exploration of this proposal in a future proceeding except in the specific case of earth station renewals. The Commission remains committed to speed, efficiency, and eliminating regulatory burdens on applicants, and the steps we take today mark our initial efforts to streamline and modernize the licensing process.

H. Streamlining Inter-Agency and Inter-Bureau Coordination and Eliminating Duplicative Coordination Requirements

46. Radiofrequency spectrum is a limited resource for communications, and many frequency bands are allocated on a shared basis between various types of operators, including federal and non-

[140] *See infra* Appx. A. (adopting a new 47 CFR § 25.121(g)).

[141] Earth station renewal applications are not typically placed on public notice, and thus are not typically subject to the provisions allowing for comments or oppositions. *See* 47 CFR § 25.151 (excluding renewals among applications or other filings required to be placed on public notice); *see also id.* § 25.154.

[142] *See, e.g.*, 47 CFR § 25.138 (limiting the ability to renew or apply for new earth station licenses in the 3.7-4.2 GHz band).

[143] *See* Intelsat Comments at 2-3; Myriota Comments at 3; SES Comments at 2-3; Viasat Comments at 3-5; Globalstar Reply at 1-3; Intelsat Reply at 4; SES Reply at 2-3; Viasat Reply at 5.

[144] *See* AWS Comments at 5-6.

[145] *See* Myriota Comments at 3.

[146] *See* SpaceX Comments at 3-9; Mangata Reply at 3-5; TechFreedom Reply at 11-13; SpaceX Reply at 2-3; *but see* Letter from Jameson Dempsey, Director Satellite Policy, Space Explorations Technologies Corp., to Marlene H. Dortch, Secretary, FCC, WC Docket No. 22-411 et al. (rec. Feb. 8, 2024) (SpaceX *Ex Parte*); SpaceX Comments, GN Docket No. 25-133, at 2 (rec. Apr. 14, 2025) (explaining that any shot clocks established should be internal).

[147] *See* SIA Comments at 6; Globalstar Reply at 1-3; Eutelsat Group Reply at 9.

[148] *See* Spire Comments at 11-12.

federal users.[149] To facilitate shared use of frequency bands and to avoid harmful interference between operators, the Commission's bureaus and offices coordinate among each other, and the Commission coordinates with other agencies such as NTIA. Under the current coordination procedures with NTIA, earth stations are identified and coordinated in the satellite application and conditions are placed on the satellite authorization regarding communication parameters with the specified earth stations. Then, as part of the earth station license application, the same earth stations that were previously coordinated at the space station authorization stage are yet again coordinated with NTIA. In the *FNPRM*, the Commission sought comment on measures to expedite coordination process, including how to make the inter-agency review process in spectrum bands shared with federal operators more efficient, and ways to eliminate duplicative coordination requirements.[150] The Commission also sought comment on how to eliminate duplicative coordination requirements for earth and space station operators, including the possibility of coordinating the earth station sites and frequencies utilized with those earth stations once as part of either the space station or earth station coordination with NTIA.[151] Generally, commenters support efforts to increase processing speed and eliminate inefficiencies in the inter-agency coordination processes,[152] eliminate duplicative coordination requirements, and point to specific frequency bands in which duplicative coordination tends to occur.[153]

47. We agree with commenters that eliminating duplicative coordination will increase efficiency. The Commission will continue to update internal processes, including inter-bureau coordination procedures, to address inefficiencies and eliminate unnecessary regulatory burdens. In addition, the Commission will continue to work with NTIA on changes to the existing inter-agency coordination process that will promote speed and efficiency.[154] We will announce additional changes at a later date as these internal processes are finalized.

I. Additional Comments Raised

48. In the *FNPRM*, the Commission sought further comment to develop the record on additional proposals to streamline the part 25 licensing framework.[155] In response, some commenters advocate for additional rule and policy changes including: (1) limits on the use of "bespoke" conditions

[149] *See* 47 CFR § 2.106 (Table of Frequency Allocations); *see generally*, Federal Communications Commission, *Radio Spectrum Allocation*, https://www.fcc.gov/engineering-technology/policy-and-rules-division/general/radio-spectrum-allocation (last visited Apr. 17, 2025).

[150] *First Report and Order*, 38 FCC Rcd at 8882-84, paras. 102-08.

[151] *Id.* at 8884, para. 108.

[152] *See, e.g.*, AWS Comments at 6-7; Myriota Comments at 4; SIA Comments at 7, 12; Spire Comments at 1, 8, 10; SpaceX Comments at 13.

[153] *See, e.g.*, AWS Comments at 3-4; Spire Comments at 9; Microsoft Comments at 3-4; SpaceX Comments at 12; SIA Comments at 8; Eutelsat Group Reply at 8; SpaceX Reply at 8.

[154] The Commission and NTIA's shared licensing authority is guided by an established set of procedures for developing regulations for radio services in the shared bands and for authorizing frequency use by federal agencies and Commission licensees. These procedures implement the obligation of NTIA and the Commission under their Memorandum of Understanding (MOU) that the agencies endeavor to give notice to each other of "all proposed actions that could potentially cause interference" to non-Federal and Federal operations respectively. *See* Memorandum of Understanding Between the Federal Communications Commission and the National Telecommunications and Information Administration (Aug. 1, 2022), https://docs.fcc.gov/public/attachments/DOC-385867A1.pdf (MOU). Therefore, we note that the Commission cannot unilaterally adopt changes to the overall inter-agency coordination process as such changes must be addressed by the MOU between the Commission and NTIA. *See First Report and Order*, 38 FCC Rcd at 8883-84, paras. 104, 106.

[155] *See First Report and Order*, 38 FCC Rcd at 8876, para. 88.

and instead issue standardized conditions for satellites;[156] (2) use the call sign and entity name in the point of communication for an earth station license as opposed to using a snapshot of the system's orbital configuration at the time of authorization;[157] (3) publication of application processing data,[158] and (4) revised proposed rules to align with environmental concerns per the National Environmental Policy Act (NEPA) and Council on Environmental Quality guidelines.[159] We decline to adopt the proposals submitted by commenters as described above because they are outside the scope of this proceeding. We may explore such suggestions in future modernization efforts. We also note that the Bureau already identifies points of contacts on earth station licenses using the call sign when available. Some authorizations, however, are specific to orbital slots and therefore require identification beyond use of the call sign.

J. Benefits and Costs

49. We find that the rules we adopt today will promote efficiency in the Commission's processing of space and earth station applications and significantly reduce regulatory compliance costs. Applying conservative assumptions, we estimate that our actions would result in annual cost savings of approximately $45,000. These costs savings are in addition to more difficult to quantify, but nevertheless important benefits such as enhanced flexibility in regulatory compliance and more efficient application processing.

50. We implement the following proposals in this Report and Order. We offer licensees significantly greater flexibility by adopting a new licensing process for earth station operators, allowing them to receive a license without specifying a satellite point of communication and to more easily remove previously identified points of communication. We take deregulatory steps to allow operators to more freely implement certain system changes by expanding the range of circumstances under which they can modify their existing licenses without prior Commission authorization. We further promote flexibility in the application process by adopting rules that extend the timeframe for license renewal applications, change the default *ex parte* status of all applications to "permit-but-disclose," and allow non-U.S.-licensed market access grantees to receive a grant of special temporary access. We reduce regulatory burden by eliminating the procedural requirement to retain paper copies of applications. Finally, we promote regulatory efficiency by adopting a 30-day shot clock for earth station renewal applications.

51. The estimate that the deregulatory steps we take today will result in annual cost savings of approximately $45,000. This reduction will occur in two specific areas. First, we estimate that costs associated with applications to update points of communication, including expenses related to salaries, benefits, and filing fees—will decrease by approximately $34,000 annually.[160] This estimate is based on

[156] *See* SpaceX Comments at 12.

[157] *See* Eutelsat Group Comments at 11.

[158] *See* Astroscale Reply at 3.

[159] Healthy Heavens Trust Initiative Comments at 2-5. *But see* TechFreedom Reply at 14 (arguing NEPA does not apply to satellite systems because the statute only applies to the "human environment" and the "biosphere," which satellite systems do not operate in).

[160] We estimate that it takes a single lawyer preparing an application to modify an earth station license by adding a space station point of communication requires between 30 minutes and 2.5 hours. We use a simple average of 1.5 hours per application. According to Commission records, there were 131 such applications filed between 2022 and 2024, yielding an average of approximately 44 applications per year. Applying the 1.5-hour estimate and a lawyer wage of $106.10 per hour, we estimate an annual compliance cost of approximately $7,000 (1.5 hours × 44 applications × $106.10/hour = $7,002.6, rounded to $7,000). In addition, we estimate annual savings of approximately $26,800 in application fees, based on applicants no longer needing to file for these modifications (44 applications × $610 per application = $26,840, rounded to $26,800). Summing these figures, we estimate total annual cost savings associated with updating points of communication to be approximately $34,000 ($7,000 + $26,800 = 33,800, rounded to $34,000). *See* Bureau of Labor Statistics, Occupational Outlook Handbook, April

(continued….)

reduced attorney filing times and savings from application fees across an anticipated 44 filings per year. Second, we estimate a cost reduction of approximately $11,000 annually associated with the elimination of hard copy retention requirements.[161] This figure is based on decreased paralegal time needed for an estimated 3,000 applications per year.

IV. PROCEDURAL MATTERS

52. *Regulatory Flexibility Act.* The Regulatory Flexibility Act of 1980, as amended (RFA),[162] requires that an agency prepare a regulatory flexibility analysis for notice and comment rulemakings, unless the agency certifies that "the rule will not, if promulgated, have a significant economic impact on a substantial number of small entities."[163] Accordingly, the Commission has prepared a Final Regulatory Flexibility Analysis (FRFA) concerning the possible impact of the rule and policy changes contained in this Second Report and Order on small entities. The FRFA is set forth in Appendix A.

53. *Paperwork Reduction Act Analysis*. This Second Report and Order may contain new or substantively modified information collection requirements subject to the Paperwork Reduction Act of 1995 (PRA), Public Law 104-13. All such requirements will be submitted to the Office of Management and Budget (OMB) for review under Section 3507(d) of the PRA. OMB, the general public, and other federal agencies will be invited to comment on any new or modified information collection requirements contained in this proceeding. In addition, we note that pursuant to the Small Business Paperwork Relief Act of 2002, Public Law 107-198, *see* 44 U.S.C. § 3506(c)(4), we previously sought specific comment on how the Commission might further reduce the information collection burden for small business concerns with fewer than 25 employees.

54. In this present document, we have assessed the effects of revising our earth station licensing rules and adopting streamlined earth station rules and rules related to relocating GSOs and certain STA applicants and find that they will have a small impact on small business concerns. Due to the significant costs involved in earth station and space station development and deployment, we anticipate that few entities impacted by this rulemaking would qualify as small businesses.

(Continued from previous page)
2025 (Jul. 9, 2025), https://www.bls.gov/ooh/legal/lawyers.htm. According to the Bureau of Labor Statistics, as of April 2025, the median wage for lawyers was $72.67/hour and benefits averaged $33.43/hour. Total compensation therefore averaged $72.67 + 33.43 = $106.10. Press Release, Bureau of Labor Statistics, Employer Costs for Employee Compensation – March 2025 at 1 (Jul. 9, 2025), https://www.bls.gov/news.release/pdf/ecec.pdf. Using these figures, benefits constitute a markup of $15.00/$32.92 = 46%. We therefore mark up wages by 46% to account for benefits ($72.67 × 1.46 = $106.10).

[161] We estimate that the time saved by no longer requiring applicants to retain hard copies of applications is five minutes per application. With an average of 3,000 applications per year, the total time saved annually is estimated at 250 hours (5/60 hours × 3,000 applications = 250 hours). Assuming 250 hours of paralegal time saved and a median paralegal wage of $42.82 per hour, we estimate an annual cost savings of approximately $11,000 (250 hours × $42.82/hour = $10,705, rounded to $11,000).

See Bureau of Labor Statistics, Occupational Outlook Handbook, April 2025 (Jul. 9, 2025), https://www.bls.gov/ooh/legal/paralegals-and-legal-assistants.htm. According to the Bureau of Labor Statistics, as of April 2025, the median wage for paralegals and legal assistants was $29.33/hour. Benefits averaged 46% of wages, or $13.49/hour ($29.33 × 0.46 = $13.49), yielding a total compensation estimate of $42.82/hour, rounded to $43/hour. Press Release, Bureau of Labor Statistics, Employer Costs for Employee Compensation – March 2025 at 1 (Jul. 9, 2025), https://www.bls.gov/news.release/pdf/ecec.pdf. Using these figures, benefits constitute a markup of $15.00/$32.92 = 46%. We therefore mark up wages by 46% to account for benefits ($29.33 × 1.46 = $42.82).

[162] 5 U.S.C. §§ 601 *et seq.*, as amended by the Small Business Regulatory Enforcement and Fairness Act (SBREFA), Pub. L. No. 104-121, 110 Stat. 847 (1996).

[163] *Id.* § 605(b).

55. Additionally, this document may contain non-substantive modifications to approved information collections. Any such modifications will be submitted to OMB for review pursuant to OMB's non-substantive modification process

56. *Congressional Review Act.* The Commission has determined, and the Administrator of the Office of Information and Regulatory Affairs, Office of Management and Budget, concurs that this rule is "non-major" under the Congressional Review Act, 5 U.S.C. § 804(2). The Commission will send a copy of this Second Report and Order to Congress and the Government Accountability Office pursuant to 5 U.S.C. § 801(a)(1)(A).

57. *People with Disabilities.* To request materials in accessible formats for people with disabilities (braille, large print, electronic files, audio format), send an e-mail to fcc504@fcc.gov or call the Consumer and Governmental Affairs Bureau at (202) 418-0530 (voice).

58. *Further Information.* For additional information on this proceeding, contact Gregory Coutros, Space Bureau, Earth Station Licensing Division, at gregory.coutros@fcc.gov or at (202) 418-2351.

V. ORDERING CLAUSES

59. IT IS ORDERED, pursuant to Sections 4(i), 7(a), 301, 303, 307, 308, 309, 310, 332 of the Communications Act of 1934, as amended, 47 U.S.C. §§ 154(i), 157(a), 301, 303, 307, 308, 309, 310, 332, that this Second Report and Order IS ADOPTED.[164]

60. IT IS FURTHER ORDERED that this Second Report and Order SHALL BE EFFECTIVE 30 days after publication in the Federal Register, with the exception of revisions to sections 25.110(e), 25.117(i), 25.118(a)(3), 25.118(b)(1), 25.118(b)(2), 25.118(b)(3), 25.118(e)(4), 25.118(h), and 25.137(h) of the Commission's rules, 47 CFR § 25.110(e), 47 CFR § 25.117(i), 47 CFR § 25.118(a)(3), 47 CFR § 25.118(b)(1), 47 CFR § 25.118(b)(3), 47 CFR § 25.118(e)(4), 47 CFR § 25.118(h), and 47 CFR § 25.137(h) (amendatory instructions 4, 6, 8, and 10 in Appendix A below), which may contain new or modified information collection requirements and will not be effective until after the Office of Management and Budget completes any review the Space Bureau determines is required under the Paperwork Reduction Act and provide an effective date by subsequent Public Notice.

61. IT IS FURTHER ORDERED that the Office of the Secretary, SHALL SEND a copy of this Second Report and Order, including the FRFA Analysis, to the Chief Counsel for Advocacy of the Small Business Administration, in accordance with Section 603(a) of the Regulatory Flexibility Act.

62. IT IS FURTHER ORDERED that the Office of the Managing Director, Performance Program Management, SHALL SEND a copy of this Second Report and Order in a report to be sent to Congress and the Government Accountability Office pursuant to the Congressional Review Act.[165]

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

[164] Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 20, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 68708 (Dec. 28, 1993).

[165] *See id.* § 801(a)(1)(A).

APPENDIX A

Final Rules

For the reasons detailed in the document, the Federal Communications Commission amends 47 CFR parts 1 and 25 as follows:

PART 1 – Practice and Procedure

1. The authority citation for part 1 continues to read as follows:

AUTHORITY: 47 U.S.C. chs. 2, 5, 9, 13; 28 U.S.C. 2461 note, unless otherwise noted.

2. Amend § 1.1206 by revising paragraph (a)(12) to read as follows:

§ 1.1206 Permit-but-disclose proceedings.

(a) * * *

(12) Applications for space and earth station authorizations, including requests for U.S. market access through non-U.S. licensed space stations.

* * * * *

PART 25 – SATELLITE COMMUNICATIONS

3. The authority citation for part 25 continues to read as follows:

AUTHORITY: 47 U.S.C. 154, 301, 302, 303, 307, 309, 310, 319, 332, 605, and 721, unless otherwise noted.

4. Delayed indefinitely, amend § 25.110 by removing and reserving paragraph (e):

§ 25.110 Filing of applications, fees, and number of copies.

* * * * *

(e) [reserved]

* * * * *

5. Amend § 25.115 by revising paragraph (a)(5)(i) to read as follows:

§ 25.115 Applications for earth station authorizations.

(a) * * *

(5) * * *

(i) A detailed description of the service to be provided, including frequency bands and satellites to be used. The applicant may identify either the specific satellite(s) with which it plans to operate, or the eastern and western boundaries of the arc it plans to coordinate.

* * * * *

6. Delayed indefinitely, amend § 25.117 by removing and reserving paragraph (i):

§ 25.117 Modification of station license.

* * * * *

(i) [reserved]

* * * * *

7. Amend § 25.118 by adding paragraph (g) to read as follows:

§ 25.118 Modifications not requiring prior authorization.

* * * * *

(g) *Adding Satellite Points of Communication.* An earth station operator may add a point of communication without prior authorization, provided: (1) the operator has permission from the satellite operator to communicate with the satellite system; (2) the earth station operator does not repoint the earth station's antenna beyond any coordinated range; (3) adding a point of communication does not result in an increased risk of harmful interference; (4) adding the point of communication does not involve any change to authorized frequencies; and (5) the added point of communication is not a satellite that does not have U.S. market access. An earth station applicant may begin operating with the added point of communication under this rule part after both electronically filing Form 312 and Schedule B in the International Communications Filing System (ICFS) in accordance with the applicable provisions of part 1, subpart Y of this chapter and paying the applicable filing fee. This filing shall constitute a conditional authorization. The conditional authorization will automatically expire and the operator must terminate operations immediately using the new point of communication if, within 15 days of paying the filing fee, the Commission notifies the earth station operator that the added point of communication does not comply with requirements of this paragraph. If the Commission does not provide the foregoing notice within the prescribed period, the conditional authorization will automatically expire and the license will be modified in ICFS to add the point of communication as of the date of payment of the filing fee. Nothing in this rule part prohibits the Commission from pursuing enforcement action after the lapse of the 15-day period for noncompliant operation, including noncompliant operation occurring during the period of conditional authorization.

8. Delayed indefinitely, amend § 25.118 by revising paragraphs (a)(3), (b)(2) and (e)(4), removing and reserving paragraphs (a)(3)(i)-(ii), (b)(1), and adding paragraphs (b)(3) and (h) to read as follows:

§ 25.118 Modifications not requiring prior authorization.

(a) * * *

(3) An earth station operator may remove a point of communication without prior authorization.

(i) [reserved]

(ii) [reserved]

* * * * *

(b) * * *

(1) [Reserved]

(2) Licensees may make other changes to their authorized earth stations, including replacing equipment or the addition of new transceiver/antenna combinations, without notifying the Commission, provided the modification does not involve:

* * * * *

(vii) additional interference protections; or

(viii) increased radiation to humans beyond the limits permitted by the Commission's rules.

(3) An earth station operator may modify the antenna identification for its authorized earth stations without prior authorization and without notifying the Commission.

* * * * *

(e) * * *

(4) The licensee certifies that all operations during the drift will be conducted on an unprotected, non-harmful interference basis and that all operations will be coordinated with any existing GSO space stations to ensure that no unacceptable interference results from operations during the relocation.

* * * * *

(h) *NGSO modifications, 60-day notification required.* NGSO space station licensees may make the following modifications upon notifying the Commission and any potentially affected licensed spectrum user at least 60 days prior to implementation of the change, provided the operator certifies in the notice that it meets the following requirements. The notification must be filed electronically on FCC Form 312 through the International Communications Filing System (ICFS), or any successor system as announced via public notice, in accordance with the applicable provisions of part 1, subpart Y of this chapter:

(1) NGSO space station operators may change an antenna, sensor or microelectronics so long as the changes do not cause:

(i) an increase in the transmit power, EIRP, EIRP density, out-of-band emissions, or change in the antenna pattern(s) or antenna gain characteristics beyond any technical parameters specified in the underlying authorization;

(ii) a change in the area-to-mass ratio of the satellite;

(iii) an increase in the in-orbit collision risk;

(iv) an increase in the re-entry risk;

(v) an increase in the risk of harmful interference to other system(s); or

(vi) an increase in the need for harmful interference protection for the system.

9. Amend § 25.121 by revising paragraph (e) and adding paragraph (g) to read as follows:

§ 25.121 License term and renewals.

* * * * *

(e) *Renewal of licenses*. Applications for renewals of earth station licenses must be submitted on FCC Form 312R no earlier than 12 months, and no later than 30 days, before the expiration date of the license. Applications for space station system replacement authorization for non-geostationary orbit satellites shall be filed no earlier than 12 months, and no later than 30 days, before the expiration date of the license.

* * * * *

(g) *Autogrant procedures for certain earth station renewals.*

(1) An application for renewal of an earth station license will be deemed granted without any further action by the Commission 30 days after filing and paying any associated regulatory fees if the application meets all of the following criteria:

(a) The renewal application does not make any modifications to the license;

(b) The renewal application does not make any changes to the currently authorized operating parameters;

(c) The renewal application is not for operations in a frequency band that is subject to a freeze on new or renewed licenses or is restricted in how a license may be renewed; and

(d) The Commission does not choose to place the application on public notice pursuant to § 25.151.

10. Delayed indefinitely, amend § 25.137 by adding paragraph (h) to read as follows:

§ 25.137 Requests for U.S. market access through non-U.S.-licensed space stations.

* * * * *

(h) A non-U.S. licensed space station operator with a grant of market access may seek special temporary access for operations under the procedures set forth in § 25.120.

APPENDIX B

Final Regulatory Flexibility Analysis

1. As required by the Regulatory Flexibility Act of 1980, as amended (RFA),[1] the Federal Communications Commission (Commission) incorporated an Initial Regulatory Flexibility Analysis (IRFA) in the *Expediting Initial Processing of Satellite and Earth Station Applications Further Notice of Proposed Rulemaking* (FNPRM) released in September 2023.[2] The Commission sought written public comment on the proposals in the FNPRM, including comment on the IRFA. No comments were filed addressing the IRFA. This Final Regulatory Flexibility Analysis (FRFA) conforms to the RFA.[3]

A. Need for, and Objectives of, the Rules

2. In recent years, the Commission has received an unprecedented number of applications for earth and space station licenses. The Second Report and Order (Order) facilitates and expedites the acceptance for filing of earth and space station applications under 47 CFR part 25 and adopts other streamlining measures to keep pace with the growing demand for satellite services and innovative satellite operations. This rulemaking will open new modes of business to further fuel the growth of the space economy, eliminate unnecessary and burdensome requirements on earth and space station operators, and promote efficiency and eliminate administrative burdens.

3. The Order adopts changes to Commission's rules aimed at removing barriers and regulatory burdens on earth and space station operators. Specifically, the Order revises section 1.1206(a) to reclassify the status earth and space station applications as permit-but-disclose pursuant to the Commission's *ex parte* rules; section 25.115(a)(5)(i) to establish a baseline license for earth station applicants that do not require an identified point of communication prior to receiving a grant of authority to operate; section 25.118(a)(3) allowing earth station operators to remove a point of communication without prior authorization; section 25.118(b)(2) to expand equipment modifications to authorized earth stations that operators can make; section 25.118(e)(4) to enable GSO space station operators to conduct operations beyond telemetry, tracking, and command during relocation without prior authorization; and section 25.121(e) to extend the timeframe for earth and space station licensees to file an application for renewal. Additionally, the Order removes and reserves section 25.110(e), eliminating the requirement that the applicant maintain paper copies of their application; removes section 25.117(i), eliminating a limited procedure for earth station licensees to add identified points of communication; removes and reserves section 25.118(b)(1), eliminating a redundant rule that could cause confusion with 25.118(b)(2). Finally, the Order adds section 25.118(b)(3) which allows for earth station operators to modify antenna identification without prior authorization and without providing notice to the Commission; section 25.118(g), enabling earth station operators to add a point of communication provided certain criteria are met; section 25.118(h) to permit certain modifications to NGSOs upon 60-days' notice to the Commission; and section 25.137(h), permitting non-U.S. licensed market access grantees to request special temporary access pursuant to the procedures for special temporary authorization typically available to U.S. licensees.

B. Summary of Significant Issues Raised by Public Comments in Response to the IRFA

4. There were no comments filed that specifically addressed the proposed rules and policies presented in the IRFA.

---

[1] 5 U.S.C. § 603. The RFA, 5 U.S.C. §§ 601-612 has been amended by the Small Business Regulatory Enforcement Fairness Act of 1996 (SBREFA), Pub. L. No. 104-121, Title II, 110 Stat. 847 (1996).

[2] *See Expediting Initial Processing of Satellite and Earth Station Applications*; *Space Innovation*, IB Docket Nos. 22-411 and 22-271, Report and Order and Further Notice of Proposed Rulemaking, 38 FCC Rcd 8838 (2023) (*First Report and Order*).

[3] 5 U.S.C. § 604.

C. Response to Comments by the Chief Counsel for Advocacy of the Small Business Administration

5. Pursuant to the Small Business Jobs Act of 2010, which amended the RFA,[4] the Commission is required to respond to any comments the Chief Counsel for Advocacy of the Small Business Administration (SBA) filed in this proceeding, and provide a detailed statement of any change made to the proposed rules as a result those comments.[5] The Chief Counsel did not file any comments in response to the proposed rules or policies in this proceeding.

D. Description and Estimate of the Number of Small Entities to Which the Rules will Apply

6. The RFA directs agencies to provide a description of, and where feasible, an estimate of, the number of small entities that may be affected by the rules adopted herein.[6] The RFA generally defines the term "small entity" as having the same meaning as under the Small Business Act.[7] In addition, the term "small business" has the same meaning as the term "small business concern" under the Small Business Act.[8] A "small business concern" is one which: (1) is independently owned and operated; (2) is not dominant in its field of operation; and (3) satisfies any additional criteria established by the Small Business Administration (SBA).[9]

7. *Satellite Telecommunications*. This industry comprises firms "primarily engaged in providing telecommunications services to other establishments in the telecommunications and broadcasting industries by forwarding and receiving communications signals via a system of satellites or reselling satellite telecommunications."[10] Satellite telecommunications service providers include satellite and earth station operators. The SBA small business size standard for this industry classifies a business with $44 million or less in annual receipts as small.[11] U.S. Census Bureau data for 2017 show that 275 firms in this industry operated for the entire year.[12] Of this number, 242 firms had revenue of less than $25 million.[13] Consequently, using the SBA's small business size standard most satellite telecommunications service providers can be considered small entities. The Commission notes however, that the SBA's revenue small business size standard is applicable to a broad scope of satellite

---

[4] Small Business Jobs Act of 2010, Pub. L. No. 111-240, 124 Stat. 2504 (2010).

[5] 5 U.S.C. § 604(a)(3).

[6] *Id.*

[7] *Id*. § 601(6).

[8] *Id*. § 601(3) (incorporating by reference the definition of "small business concern" in the Small Business Act, 15 U.S.C. § 632). Pursuant to 5 U.S.C. § 601(3), the statutory definition of a small business applies "unless an agency, after consultation with the Office of Advocacy of the Small Business Administration and after opportunity public comment, establishes one or more definitions of such term which are appropriate to the activities for the agency and publishes such definition(s) in the Federal Register."

[9] 15 U.S.C. § 632.

[10] *See* U.S. Census Bureau, *2017 NAICS Definition, "517410 Satellite Telecommunications,"* https://www.census.gov/naics/?input=517410&year=2017&details=517410.

[11] *See* 13 CFR § 121.201, NAICS Code 517410.

[12] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 517410, https://data.census.gov/cedsci/table?y=2017&n=517410&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[13] *Id*. The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

telecommunications providers included in the U.S. Census Bureau's Satellite Telecommunications industry definition. Additionally, the Commission neither requests nor collects annual revenue information from satellite telecommunications providers, and is therefore unable to more accurately estimate the number of satellite telecommunications providers that would be classified as a small business under the SBA size standard. Additionally, based on Commission data in the 2024 Universal Service Monitoring Report, as of December 31, 2023, there were 57 providers that reported they were engaged in the provision of satellite telecommunications services.[14] Of these providers, the Commission estimates that approximately 40 providers have 1,500 or fewer employees.[15] Consequently, using the SBA's small business size standard, a little more than half of these providers can be considered small entities.

8. *All Other Telecommunications.* This industry is comprised of establishments primarily engaged in providing specialized telecommunications services, such as satellite tracking, communications telemetry, and radar station operation.[16] This industry also includes establishments primarily engaged in providing satellite terminal stations and associated facilities connected with one or more terrestrial systems and capable of transmitting telecommunications to, and receiving telecommunications from, satellite systems.[17] Providers of Internet services (e.g. dial-up ISPs) or Voice over Internet Protocol (VoIP) services, via client-supplied telecommunications connections are also included in this industry.[18] The SBA small business size standard for this industry classifies firms with annual receipts of $40 million or less as small.[19] U.S. Census Bureau data for 2017 show that there were 1,079 firms in this industry that operated for the entire year.[20] Of those firms, 1,039 had revenue of less than $25 million.[21] Based on this data, the Commission estimates that the majority of "All Other Telecommunications" firms can be considered small.

E. Description of Economic Impact and Projected Reporting, Recordkeeping, and Other Compliance Requirements for Small Entities

9. The RFA directs agencies to describe the economic impact of proposed rules on small entities, as well as projected reporting, recordkeeping and other compliance requirements, including an estimate of the classes of small entities which will be subject to the requirement and the type of professional skills necessary for preparation of the report or record.[22]

10. The Order amends rules that are applicable to earth and space station operators that request a license or authorization from the Commission, or by entities requesting that the Commission grant a request for U.S. market access. The changes adopted in the Order, as described below, will decrease the burden for small entities and other operators by streamlining or eliminating unnecessary

[14] *See infra* Appx. C.

[15] 47 CFR § 25.115(a)(5)(i).

[16] *See* U.S. Census Bureau, *2017 NAICS Definition*, "*517919 All Other Telecommunications,*" https://www.census.gov/naics/?input=517919&year=2017&details=517919.

[17] *Id.*

[18] *Id*.

[19] *See* 13 CFR § 121.201, NAICS Code 517919 (as of 10/1/22, NAICS Code 517810).

[20] *See* U.S. Census Bureau, *2017 Economic Census of the United States*, *Selected Sectors: Sales, Value of Shipments, or Revenue Size of Firms for the U.S.: 2017,* Table ID: EC1700SIZEREVFIRM, NAICS Code 517919, https://data.census.gov/cedsci/table?y=2017&n=517919&tid=ECNSIZE2017.EC1700SIZEREVFIRM&hidePreview=false. At this time, the 2022 Economic Census data is not available.

[21] *Id.* The available U.S. Census Bureau data does not provide a more precise estimate of the number of firms that meet the SBA size standard. We also note that according to the U.S. Census Bureau glossary, the terms receipts and revenues are used interchangeably, *see* https://www.census.gov/glossary/#term_ReceiptsRevenueServices.

[22] 5 U.S.C. § 604(a)(5).

regulatory burdens. Specifically, the Order eliminates the rule requiring applicants to maintain paper copies of their application, reclassifies the status of earth and space station applications as permit-but-disclose under our *ex parte* rules, and eliminates an outdated, limited process for earth station operators to add or remove identified points of communication. The Order also revises our rules to expand the timeframe for licensees to file an application for renewal, from the previous timeframe of no earlier than 90 days and no later than 30 days prior to the expiration, to the revised timeframe of 12 months and no later than 30 days prior to expiration.

11. Further, the Order expands certain equipment modifications to authorized earth stations that operators can make without prior authorization, so long as the equipment will not cause an increase in harmful interference or radiation risk to humans. The Order also permits earth station operators to modify antenna identification without prior authorization or notice to the Commission, and allows GSO space station operators to continue operations during relocation. Additionally, the Order permits NGSO space station operators to make certain modifications upon 60 day notice without prior authorization, provided that the changes do not cause an increase in certain power, antenna patterns, area-to-mass ratio of the satellite, in-orbit collision risk, re-entry risk, or harmful interference to other systems. Finally, the Order creates a baseline license for earth station applicants with flexibility to add identified points of communication and a process to obtain special temporary access for non-U.S. licensed market access. In light of these burden-reducing effects of these rule amendments and the elimination of some rules, the Commission does not believe that small entities will have to hire additional professionals to comply with the Order because the new and revised rules eliminate or reduce previous licensing requirements for small and other operators. Further, we utilize existing systems and processes that small operators should be familiar with, and make changes that require the minimum information necessary to achieve the above stated goals.

F. Discussion of Steps Taken to Minimize the Significant Economic Impact on Small Entities, and Significant Alternatives Considered

12. The RFA requires an agency to provide, "a description of the steps the agency has taken to minimize the significant economic impact on small entities…including a statement of the factual, policy, and legal reasons for selecting the alternative adopted in the final rule and why each one of the other significant alternatives to the rule considered by the agency which affect the impact on small entities was rejected."[23]

13. The Commission considered alternatives to the rule revisions we adopt today and takes steps to remove unnecessary regulatory burdens that will better facilitate the licensing process for new industries, and also minimize potential significant economic impact on small entities. For example, as discussed in section E above, in the Order, we eliminate or reduce filing burdens on small entities by eliminating the rule requiring applicants to maintain paper copies of their application, expand the timeframes for licensees to file an application for renewal, and expand equipment modifications to authorized earth stations that operators can make without prior authorization. The Commission selected these alternatives to the existing rules because they are consistent with our goals of providing flexibility and reducing regulatory burdens for operators. Further, commenters support many of these changes, such as expanding the filing window for earth station renewal applications to no earlier than 12 months, and no later than 30 days, prior to the expiration of the existing license. However, we declined to adopt other alternatives, such as including all administrative changes as modifications, and instead will rely upon the specific prohibitions enumerated in the revised rules. Other proposals, involving alternatives to permit NGSO space station operators to make modifications to their orbital configuration, establishing a Permitted List for NGSOs, and imposing shot clocks for final action on certain types of applications, were not adopted because there is not enough information on the record to support changes at this time. Finally, some proposals, including such alternatives as imposing limits on the use of "bespoke"

[23] *Id*. § 604(a)(6).

conditions, using the call sign and entity name in the point of communication for an earth station license, publishing application processing data, and revising proposed rules to align with environmental concerns, were not adopted because they were outside the scope of this proceeding.

G. Report to Congress

14. The Commission will send a copy of the Order, including this FRFA, in a report to Congress pursuant to the Congressional Review Act.[24] In addition, the Commission will send a copy of the Order, including this FRFA, to the Chief Counsel for Advocacy of the SBA and will publish a copy of the Order and this FRFA (or summaries thereof) in the Federal Register.[25]

[24] *Id*. § 801(a)(1)(A).

[25] *Id.* § 604(b).

APPENDIX C

List of Comments

Amazon Web Services (AWS Comments)

Healthy Heavens Trust Initiative (HHTI Comments)

Intelsat License LLC (Intelsat Comments)

Iridium Communications, Inc. (Iridium Comments)

Michael Ravnitzky (Michael Ravnitzky Comments)

Microsoft Corporation (Microsoft Comments)

Myriota Pty Ltd. (Myriota Comments)

National Radio Astronomy Observatory and Green Bank Observatory (Ad Hoc Comments)

Satellite Industry Association (SIA Comments)

Space Exploration Holdings, LLC (SpaceX Comments)

SES Americom, Inc. and O3b Limited (SES Comments)

Spire Global, Inc. (Spire Comments)

Viasat Inc. (Viasat Comments)

WorldVu Satellites Limited and Eutelsat S.A. (Eutelsat Group Comments)

List of Reply Comments

Astroscale U.S., Inc. (Astroscale Reply)

Globalstar (Globalstar Reply)

Intelsat License LLC (Intelsat Reply)

Iridium Communications, Inc. (Iridium Reply)

Mangata Networks (Mangata Reply)

Microsoft Corporation (Microsoft Reply)

Space Exploration Holdings, LLC (SpaceX Reply)

SES Americom, Inc. and O3b Limited (SES Reply)

TechFreedom (TechFreedom Reply)

Verizon (Verizon Reply)

Viasat Inc. (Viasat Reply)

WorldVu Satellites Limited and Eutelsat S.A. (Eutelsat Group Reply)

***Ex Parte* Filings**

CTIA (CTIA Ex Parte)

Healthy Heavens Trust Initiative (HHTI Ex Parte)

National Radio Astronomy Observatory and Green Bank Observatory (Ad Hoc Ex Parte)

Space Exploration Holdings, LLC (SpaceX Ex Parte)

Satellite Industry Association (SIA Ex Parte)

Spire Global, Inc., Planet Labs PBC, and HawkEye 360 (Spire Global et. al Ex Parte)

Iridium Communications Inc., July 24, 2025 Ex Parte (Iridium July 24, 2025 Ex Parte)

Space Exploration Technologies Corp., July 28, 2025 Ex Parte (SpaceX July 28, 2025 Ex Parte)

Iridium Communications Inc., July 29, 2025 Ex Parte (Iridium July 29, 2025 Ex Parte)

CTIA (CTIA July 30, 2025 Ex Parte)

Space Exploration Technologies Corp. July 30, 2025 Ex Parte (SpaceX July 30, 2025 Ex Parte)

Iridium Communications Inc. July 30, 2025 Ex Parte (Iridium July 30, 2025 Ex Parte)

Kuiper Systems LLC July 31, 2025 Ex Parte (Kuiper July 31, 2025 Ex Parte)

STATEMENT OF
CHAIRMAN BRENDAN CARR

Re: *Expediting Initial Processing of Satellite and Earth Station Applications and Space Innovation*, IB Docket Nos. 22-411 and 22-271, Second Report and Order (August 7, 2025).

A key pillar of our Build America Agenda is boosting the U.S. space economy. And it's not hard to see why.

The value of the global space economy just passed a whopping $600 billion. And ensuring that American companies secure leadership positions means more jobs and economic opportunity for the country.

And I am confident that our businesses will lead the world if we get the regulatory framework right. I saw some of that great, U.S. innovation just last month on a visit about an hour from here in Leesburg, Virginia. That's where I visited a company that launched the first non-geostationary satellite constellation all the way back in the 1990s. Thirty years later, they now operate a network of satellites that provides connectivity for customers across every sector of modern transportation—rail, shipping, trucking, energy, and aviation.

To help America's space companies continue to succeed and grow, we are not only working to speed up and simplify our processes, but we are also working to promote more flexibility. After all, a one-size-fits-all approach to regulation does not match the realities of the evolving space economy.

As we heard from today's presentation, we've already made significant progress toward reducing the time it takes to move through our regulatory review processes. For example, our Space Bureau has already cut the backlog of pending applications in half.

With today's action, we are taking the next step.

Often, paperwork piles up because our rules ask for too many unnecessary filings. Making the smallest change to a satellite system or earth station can require a new FCC approval. So, the Order we adopt today will eliminate FCC approval requirements for a range of routine changes that pose no risk to the public. One of our reforms will eliminate roughly half of earth station modification applications. Through these and other streamlining improvements, the FCC will hold itself accountable to more predictable timelines, such as a 30-day shot clock for earth station renewal applications.

Eliminating unnecessary paperwork doesn't just improve efficiency—it kickstarts American innovation. In particular, our reforms promise to boost an emerging business model—Ground-Station-as-a-Service—that allows multiple satellite systems to share the same ground station. This neutral-host infrastructure model has already proven to be successful in the wireless industry. By sparing companies the time and money to build their own bespoke infrastructure, we believe Ground-Station-as-a-Service can provide a similar boost for space startups.

And this is just the beginning. We will continue to take the necessary steps to inject rocket fuel into the FCC's licensing process and protect America's orbital advantage for decades to come.

Thank you to Greg Coutros, Jeanine Poltronieri, Kerry Murray, Franco Hinojosa, Sankar Persaud, Stephen Duall, and Stephanie Neville for their great work on this item.

STATEMENT OF
COMMISSIONER ANNA M. GOMEZ

Re: *Expediting Initial Processing of Satellite and Earth Station Applications and Space Innovation*, IB Docket Nos. 22-411 and 22-271, Second Report and Order (August 7, 2025).

I recently went on a mini-space tour to learn more about some of the companies leading the new space age from right here in the United States. I had the opportunity to visit both established and emerging companies in Los Angeles and San Francisco and tour their facilities—the labs powering our bustling space sector.

My goal with these visits was simple: to learn. To learn about how these innovators are contributing to the field and to discuss ways in which the Federal Communications Commission (FCC) can better meet this moment of interstellar innovation.

I visited satellite manufacturers and operators like Astranis, Rocket Lab, K2 Space, and Planet—a dynamic mix of established and new entrants manufacturing satellites in California. Each has a distinct signature and is making a unique mark on the space economy. These companies exemplify the new era of commercial space—home-grown and globally-forged.

Meeting these visionaries made me even more excited about American innovation and leadership in space. And I'm not alone. According to an industry estimate, more than 11,000 small satellites were deployed between 2022 and 2024, and, as of today, there are approximately 618 geostationary orbit (GEO) and over 10,000 non-geostationary orbit (NGSO) active satellites.[1] Further, the global satellite industry revenue in 2024 is estimated to have reached a striking $293 billion.[2] In other words, everyone is truly excited about space.

The explosive growth of this sector presents new opportunities for entrepreneurs, but it also raises new questions for regulators like the FCC, particularly around how to support innovation and competition while ensuring responsible and sustainable use of space.

The Order we adopt today is our response to keep policy up-to-speed with the fast pace of innovation and deployment in the space sector. The work leading up to this Order started a couple of years ago under the leadership of Chairwoman Rosenworcel, who also led the establishment of the Space Bureau and the rollout of the Transparency Initiative—an effort to provide space applicants with the tools and knowledge they need to file their applications for space communications.

Today, I am pleased to see that we are taking another step to streamline the earth and space station application processes, helping to pave the way for continued innovation in this growing sector.

[1] SATELLITE INDUS. ASS'N, 2025 STATE OF THE SATELLITE INDUSTRY REPORT, https://sia.org/news-resources/state-of-the-satellite-industry-report/ (last visited Aug. 7, 2025).

[2] *Id.*

STATEMENT OF
COMMISSIONER OLIVIA TRUSTY

Re: *Expediting Initial Processing of Satellite and Earth Station Applications and Space Innovation*, IB Docket Nos. 22-411 and 22-271, Second Report and Order (August 7, 2025).

On August 7, 1959—66 years ago today—NASA launched the Explorer 6 satellite. Just days later, Explorer 6 transmitted the first-ever image of Earth from space orbit to a ground station in Hawaii. That moment marked a turning point in American history, setting off a wave of innovation in space exploration and satellite communications that has endured for generations.

Today, we find ourselves in a new golden age of space activity. Satellites now underpin essential services, from broadband connectivity and GPS to television broadcasting, weather forecasting, and remote sensing.

And just as in 1959, U.S. leadership remains vital. The FCC's regulatory framework must meet this moment, supporting current innovation while paving the way for future breakthroughs.

This *Report and Order* takes a significant step in that direction. It adopts a more streamlined approach to processing satellite and earth station applications, helping to accelerate deployment without sacrificing appropriate Commission oversight of license modifications and renewals.

Importantly, the updated rules will make it easier for earth station operators to offer Ground-Station-as-a-Service capabilities. This change is especially valuable, as it will lower costs and reduce barriers to entry for satellite startups, university-led missions, scientific research, and international partners, broadening participation in the space economy.

We are in the midst of a new space race, one defined not only by competition, but by rapid innovation. Washington must not allow bureaucratic inertia to hold us back. Instead, we must foster a regulatory environment that keeps pace with technological change and enables the next generation of space services and applications to thrive.

I commend the Space Bureau for its thoughtful work on this item and look forward to continuing our progress in modernizing the FCC's approach to space.