

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of	)	
	)	
Review of the Commission's Assessment and	)	MD Docket No. 25-190
Collection of Regulatory Fees for Fiscal Year 2025	)	
	)	
Assessment and Collection of Space and Earth	)	MD Docket No. 24-85
Station Regulatory Fees for Fiscal Year 2024	)	
	)	

ORDER ON RECONSIDERATION

Adopted: June 23, 2026

Released: June 24, 2026

By the Commission:

I. INTRODUCTION

1. In this Order, we deny the petition for partial reconsideration filed by Kinéis challenging the *FY 2025 Regulatory Fees Report and Order*.¹ For the reasons presented below, we deny the petition for reconsideration and reject Kinéis's request to modify the Commission's determination to assess regulatory fees on all holders of space station authorizations as of the start of the fiscal year rather than only the holders of space station authorizations that have been certified to be operational as of the start of the fiscal year.

II. BACKGROUND

A. Space and Earth Station Regulatory Fee Rulemaking Proceeding

2. In 2024, the Commission initiated a rulemaking proceeding to seek comment on possible changes to the existing methodology for assessing regulatory fees on space and earth stations.² Among other proposals, the Commission proposed to assess regulatory fees on all authorized earth or space stations as of the start of the fiscal year.³ At the time, regulatory fees for earth and space stations were only assessed for stations that were certified as operational as of the start of the relevant fiscal year.⁴

¹ Petition for Partial Reconsideration, MD Docket Nos. 25-190 & 24-85 (filed Nov. 14, 2025), <https://www.fcc.gov/ecfs/document/11142625504269/1> (Kinéis Petition); *Review of the Commission's Assessment and Collection of Regulatory Fees for Fiscal Year 2025*, MD Docket No. 25-190, Report and Order, 40 FCC Rcd 7557 (2025) (*FY 2025 Regulatory Fees Report and Order*).

² *Assessment and Collection of Space and Earth Station Regulatory Fees for Fiscal Year 2024*, MD Docket No. 24-85, Notice of Proposed Rulemaking, 39 FCC Rcd 2833 (2024) (*FY 2024 Space and Earth Station Regulatory Fees NPRM*).

³ *FY 2024 Space and Earth Station Regulatory Fees NPRM*, 39 FCC Rcd at 2856-57, para. 57. The fiscal year commences on October 1 and ends on September 30.

⁴ *Assessment and Collection of Space and Earth Station Regulatory Fees for Fiscal Year 2024*, MD Docket No. 24-85, Third Report and Order, 40 FCC Rcd 4583, 4590, para. 20 n.45 (2025) (*Space and Earth Station Regulatory Fees Third Report and Order*) (citing Regulatory Fees Fact Sheet: FY 2024 Regulatory Fees – Space Bureau (Sept.

(continued....)

3. In the *FY 2024 Space and Earth Station Regulatory Fees NPRM*, the Commission set forth numerous reasons why such a change in methodology would be reasonable. First, the Commission tentatively concluded that there was no statutory bar to assessing regulatory fees on authorized, but not yet operational, space and earth stations.⁵ Second, it observed that both license holders and station operators granted authority to access the market in the United States benefit from substantial full time equivalent (FTE) resources.⁶ Specifically, FTE resources were used to review and grant the respective application or petition for market access as well as to protect the benefits conferred by the authorization, such as use of spectrum and orbital resources and protection from interference.⁷ In addition, the Commission observed that if regulatory fees were assessed only when space stations become operational, rather than when they are authorized, then some authorization holders would not be assessed regulatory fees associated with FTE work for potentially many years or perhaps never. As a result, space stations that become operational earlier than other licensed stations would bear the entire burden of regulatory work done on behalf of all similarly situated entities.⁸

4. In proposing the change, the Commission noted that it should not present a challenge to administer because the date a license or market access is issued is a matter of public record and contained in its licensing database.⁹ The *FY 2024 Space and Earth Station Regulatory Fees NPRM* acknowledged that the proposal could increase the costs to the satellite operator at the initial funding phases and sought comment on this and other potential collateral effects of the proposal and how the Commission should consider them.¹⁰

5. In February 2025, the Commission released the *FY 2024 Space and Earth Station Regulatory Fees FNPRM* seeking additional comment on the proposal at issue here, along with other matters.¹¹ The Commission tentatively concluded that the concerns raised regarding costs, financial risks, and the impact on innovation did not outweigh the need to assess regulatory fees on the same class who

19, 2024) at 2-3 and *Amendment of Parts 0 and 1 - Assessment and Collection of Fees*, Report and Order, 9 FCC Rcd 5333, 5364, para. 91 (1994)). No party has sought reconsideration of the determination to assess regulatory fees on all authorized earth stations, rather than on earth stations certified as operational at the start of the relevant fiscal year. Accordingly, our reconsideration focuses solely on the Commission's determination to assess regulatory fees on authorized, rather than operational, space stations.

⁵ *FY 2024 Space and Earth Station Regulatory Fees NPRM*, 39 FCC Rcd at 2857-58, para. 59. The Commission observed that section 9(d) of the Act, 47 U.S.C. § 159(d), explicitly gives the Commission authority to adjust its regulatory fees by rule if it determines that the schedule of fees requires amendment, and that Congress deleted the original textual language of section 9 that provided the basis for assessing space station regulatory fees on operational stations. *Id.*

⁶ *FY 2024 Space and Earth Station Regulatory Fees NPRM*, 39 FCC Rcd at 2858, para. 61. One FTE, a "Full Time Equivalent" or "Full Time Employee," is a unit of measure equal to the work performed annually by a full-time person (working a 40-hour workweek for a full year) assigned to the particular job, and subject to agency personnel staffing limitations established by the U.S. Office of Management and Budget. *See generally* Executive Office of the President, Office of Management and Budget, Circular No. A-11, Preparation, Submission, and Execution of the Budget (Aug. 2022).

⁷ *FY 2024 Space and Earth Station Regulatory Fees NPRM*, 39 FCC Rcd at 2858, para. 61.

⁸ *Id.* The Commission noted that regulatory fees are a zero-sum situation, so any decrease to the fees paid by one category of regulatees necessitates an increase in fees paid by other fee payors. *Id.* at n.144.

⁹ *Id.* at 2859-60, para. 63.

¹⁰ *Id.* at 2860, para. 64.

¹¹ *Assessment and Collection of Space and Earth Station Regulatory Fees for Fiscal Year 2024*, MD Docket No. 24-85, Further Notice of Proposed Rulemaking, 40 FCC Rcd 1738, paras. 13-26 (2025) (*FY 2024 Space and Earth Station Regulatory Fees FNPRM*).

benefit from the Commission's FTE efforts.¹² The Commission stated that while it understood the desire to delay assessing regulatory fees on a satellite operator until the system becomes operational and generates revenues, it did not believe that this approach best comported with the requirements of section 9 of the Communications Act nor was it fair to other fee payors in the same regulatory fee category.¹³

6. In June 2025, the Commission adopted the *Space and Earth Station Regulatory Fees Third Report and Order*, which, among other changes, adopted the proposal to assess regulatory fees on all authorized earth or space stations as of the start of the fiscal year, rather than only those certified as operational as of the start of the fiscal year.¹⁴ That is, the Commission changed the existing methodology from assessing fees only after notification that the station is operational to assessing fees on all stations authorized by license or grant of market access as of the start of the fiscal year.¹⁵ In doing so, the Commission observed that significant Commission resources, expressed in Space Bureau FTEs, are involved with the review and grant of space and earth station licenses. The Commission noted that under the existing method, fee payors with systems that become operational earlier than other licensed systems bear the entire fee burden of regulatory work done on behalf of all regulated systems. Moreover, even if a system never becomes operational, the licensee or market access grant recipient nonetheless benefited from the FTE burdens.¹⁶ In such an instance, the Commission would not be able to recover the FTE burdens associated with regulating the licensed space or earth station, and other licensees with operational space or earth stations would have to bear all the costs of such regulation.¹⁷ The Commission also observed that, given the bespoke nature of many satellite systems, FTE resources are used by the industry before, during, and after an application is filed.¹⁸ Finally, the Commission concluded that assessing regulatory fees on authorized, not just operational stations, broadens the base of regulatory fee payors, creating a more fair methodology.¹⁹

7. In August 2025, the Commission adopted a schedule of regulatory fees to be assessed and collected by the end of FY 2025.²⁰ In doing so, it implemented the amendments to the fee methodology that were adopted in the *Space and Earth Station Regulatory Fees Third Report and Order*, including the change to assessing regulatory fees on all authorized space stations as of the start of the fiscal year, rather than only on stations that had notified as being operational as of the start of the fiscal year.²¹ The Commission specifically declined a request by petitioner Kinéis to interpret "authorized stations" solely as stations "that have received unconditional permission to provide service without the need for further agency action."²² The Commission found that this request effectively was an attempt to revisit whether operational status should be the basis for assessing regulatory fees on space station, although the

¹² *Id.* at para. 18.

¹³ *Id.* Fairness is one of the overarching goals in implementing regulatory fee system. *See, e.g., FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7564, para. 14, n.44.

¹⁴ *Space and Earth Station Regulatory Fees Third Report and Order* at paras. 3 & 20.

¹⁵ *Id.* at para. 20.

¹⁶ *Id.* at paras. 21 & 29. The Commission also noted that, although the term of a license does not commence until the space station or system of space stations is operational, the benefits and protections provided by a license or market access grant, such as the ability to use spectrum and orbital resources and to preclude others from using those same resources, accrue upon authorization or grant. *Id.* at n.49.

¹⁷ *Id.* at para. 21.

¹⁸ *Id.*

¹⁹ *Id.* The Commission also observed that broadening the base to include authorized, but not operational, stations more accurately allocates FTE burdens. *Id.* at para. 25.

²⁰ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd 7557, para. 1.

²¹ *Id.* at 7572, para. 39.

²² *Id.* at 7573, para. 41.

Commission had just decided in June 2025 that the operational status of a space or earth station should no longer be the deciding factor of whether regulatory fees should be assessed.²³ The Commission reiterated that significant FTE burdens are involved with the licensing of space and earth stations, even before a station becomes operational, and that if an authorized space station never becomes operational, then the FTE burdens associated with oversight and regulating such space stations would never be recovered and would have to be borne by stations that are operational.²⁴ The Commission found that these considerations equally apply to space stations that are authorized, but subject to a condition that needs to be fulfilled by the licensee or grantee prior to becoming operational, or prior to accessing the U.S. market in the case of a non-U.S. licensed space station.²⁵

8. The Commission also pointed to the prior finding in the *Space and Earth Station Regulatory Fees Third Report and Order* that assessing regulatory fees on authorized stations broadens the base of regulatory fee payors, spreading the recovery of regulatory fees from all licensees and grantees that benefit from the Space Bureau's licensing and regulatory activities, and potentially lowering the per unit regulatory fee burden by increasing the number of units on which fees are assessed.²⁶ The Commission found that this rationale for adopting regulatory fees on authorized stations would be undermined by not assessing regulatory fees on space stations that are authorized, but are subject to conditions that need to be fulfilled prior to commencing operations. Not assessing regulatory fees until all aspects of an application are fully resolved could effectively remove a significant number of current fee payors from regulatory fee assessments.²⁷ Finally, the Commission found that requiring Commission staff to determine whether the conditions placed on every space and earth station grant prevent the licensee from commencing operations risks being subjective and administratively burdensome.²⁸

B. Kinéis Petition for Reconsideration

9. Kinéis seeks partial reconsideration of the *FY 2025 Report and Order*. No other party has sought reconsideration. No parties filed oppositions in response to Kinéis's petition.²⁹

III. DISCUSSION

10. *Standard of Review.* Under section 1.429 of the Commission's rules, any interested person may petition for reconsideration of a final action in a rulemaking proceeding.³⁰ Our rules require that a petition for reconsideration must state with particularity the respects in which the action taken

²³ *Id.*

²⁴ *Id.* (citing *Space and Earth Station Regulatory Fees Third Report and Order*, 39 FCC Rcd at 10154-55, para. 21).

²⁵ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7573-74, para. 41. The Commission also noted that assessment of regulatory fees could provide an incentive for licensees to resolve any aspects of their application that are within their control prior to action on the application, or as quickly as possible if the application is granted with conditions subject to the licensee's control. *Id.* at 7574, para. 41 n.113.

²⁶ *Id.* at 7574, para. 42 (citing *Space and Earth Station Regulatory Fees Third Report and Order*, 39 FCC Rcd at 10154-55, para. 21).

²⁷ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7574, para. 42. The Commission noted that all the NGSO large constellation fee payors have not received unconditional authorization for all aspects of their applied-for systems. If they are not assessed regulatory fees, their share of NGSO space station regulatory fees would need to be paid by other NGSO space station fee payors. *Id.* at 7574, para. 42 n.115.

²⁸ *Id.* at 7574, para. 42.

²⁹ The Commission released a public notice inviting comment on the Kinéis Petition. *Petition for Reconsideration of Action in Proceeding*, Public Notice, Report No. 3233 (rel. Apr. 9, 2026). The public notice was also published in the Federal Register. Federal Communications Commission, *Petition for Reconsideration of Action in Rulemaking Proceeding*, 91 Fed. Reg. 20970 (Apr. 20, 2026).

³⁰ 47 CFR § 1.429(a).

should be changed,³¹ and must be filed within 30 days from the date of public notice of such action.³² In addition, a petition for reconsideration cannot rely on facts or arguments that were not previously presented to the Commission, except under enumerated conditions.³³

A. The Commission Sufficiently Considered the Concerns of Kinéis

11. Kinéis argues that the Commission did not adequately address all aspects of the concerns raised regarding the assessment of regulatory fees on space stations that are “provisionally authorized,” but that remain subject to a “critical” condition on their authorization that would preclude the licensee from initiating service without further agency action.³⁴ Kinéis asserts that the Commission failed to consider fully all aspects of the financial burdens that its definition of “authorized” places upon small, start-up operators.³⁵ It states that the Commission failed to acknowledge that a license or grant of market access, without certainty that the licensee or grantee will be able to satisfy all conditions of the grant and be able to access the market, is likely to have a significant detrimental effect on the licensee or grantee.³⁶ Instead, Kinéis broadly argues that the Commission’s decision to assess fees on space stations authorized as of the start of the fiscal year, but not yet operational, reflected a bias towards maximizing fee collections and avoiding the need for administrative decisions, while discounting the significant financial impact on licensees whose authorizations “remain in regulatory limbo” absent grant of unconditional authority and who may lack the resources to pay regulatory fees without an unrestricted license.³⁷ Kinéis claims that the Commission focused solely on the administrative burden of having to determine whether the conditions placed on every earth or space station grant prevent the licensee (or grantee) from commencing operations, which it alleges is not a valid concern.³⁸

12. We disagree that the Commission failed to consider sufficiently Kinéis’s concerns. The Commission explained its reasoning for declining to interpret “authorized stations” solely as stations “that have received unconditional permission to provide service without the need for further agency action” as requested by Kinéis.³⁹ We disagree that the Commission failed to acknowledge the “significant detrimental effect” that assessing regulatory fees on authorized stations would have on fee payors that are conditionally licensed or granted market access, without certainty the licensee or grantee will be able to satisfy all the conditions. To the contrary, we recognize that assessing a regulatory fee on any station—including those authorized but subject to conditions—involves a financial burden for a regulatory fee payor. However, as the Commission correctly observed, the Commission changed the methodology used to assess regulatory fees from one based on the operational status of the space station to whether the space station was authorized, since significant FTE burdens are involved with the licensing of space stations, even before a station becomes operational.⁴⁰ That is, the Commission decided to assess regulatory fees once an applicant becomes a licensee or grantee and receives the benefits of regulation (that is, benefits from the FTE burdens that went into reviewing and granting the license and that go into oversight and regulation of the licensee after the license is granted). Congress has prescribed a method for the Commission to collect the full annual salaries and expenses (S&E) appropriation by keying our regulatory

³¹ *Id.* § 1.429(c).

³² *Id.* § 1.429(d).

³³ *Id.* § 1.429(b).

³⁴ Kinéis Petition at 1.

³⁵ *Id.* at 3.

³⁶ *Id.*

³⁷ *Id.* at 2.

³⁸ *Id.* at 3-4.

³⁹ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7573-74, para. 41 (citing Kinéis Comments at 2).

⁴⁰ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7573-74, para. 41.

fee assessment to the relevant FTE burden.⁴¹ The methodology for assessing regulatory fees must “reflect the full-time equivalent number of employees within the bureaus and offices of the Commission, adjusted to take into account factors that are reasonably related to the benefits provided to the payor of the fee by the Commission’s activities.”⁴² FTEs within a bureau are not assigned to specific fee categories “by rote or at random, but rather in a manner that reflects the time spent by FTEs on a regulatory fee category, which is in itself a reflection of ‘benefit’ to the fee category.”⁴³ Thus, the fee assigned to each regulatory fee category relates to the FTE burden associated with oversight and regulation of each regulatory fee category by the relevant core bureaus.⁴⁴

13. Because the annual assessment of regulatory fees is a zero-sum game, adopting Kinéis’s proposal would result in an increased financial burden on other regulatory fee payors. As the Commission previously found, “assessing regulatory fees on authorized stations broadens the base of regulatory fee payors, spreading the recovery of fees from all licensees and grantees that benefit from the Space Bureau’s licensing and regulatory activities, and potentially lowering the per unit regulatory fee burden by increasing the number of units on which fees are assessed.”⁴⁵ We are unpersuaded by Kinéis’s argument that such entities should be excluded from the base of regulatory fee payors. Moreover, to the extent Kinéis argues that it does not have an ability to pay regulatory fees, we remind Kinéis of existing processes to seek a waiver, reduction, or deferral of regulatory fees to mitigate the impact of regulatory fees on operators when paying such fees would cause a hardship.⁴⁶

14. Furthermore, under Kinéis’s proposal, it is more than an “inconvenience” to require the Commission to assess whether license conditions provide certainty that a licensee or grantee can operate or enter the U.S. market under the license or grant.⁴⁷ Virtually every space station license or market access grant is subject to conditions. In proposing regulatory fees, the Commission must determine the number of units in a category over which regulatory fees are to be assessed. The fewer units, the greater the regulatory fee per unit.⁴⁸ As the Commission stated, requiring Commission staff to determine whether conditions placed on every space (and earth) station license or market access grant would prevent the licensee from commencing operations risks being subjective and administratively burdensome.⁴⁹ The Commission also noted that all regulatory fee payors in the large constellation non-geostationary orbit

⁴¹ See generally *FY 2025 Regulatory Fees Report and Order*, paras. 6-12 (describing the requirements of 47 U.S.C. § 159).

⁴² 47 U.S.C. § 159(d).

⁴³ *Review of the Commission’s Assessment and Collection of Regulatory Fees*, Report and Order and Notice of Inquiry, 37 FCC Rcd 10845, 10847, para. 3 & n.18 (2022) (*FY 2022 Report and Order*) (citing *Assessment and Collection of Regulatory Fees for Fiscal Year 2007*, MD Docket No. 07-81, Report and Order and Further Notice of Proposed Rulemaking, 22 FCC Rcd 15712, 15719, para. 19 (2007) (“Section 9 is clear, however, that regulatory fee assessments are based on the burden imposed on the Commission, not benefits realized by regulatees.”)).

⁴⁴ *Id.*

⁴⁵ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7574, para. 42.

⁴⁶ Section 9A(d) permits the Commission to waive, reduce, or defer payment of a regulatory fee and associated interest charges and penalties for good cause. 47 U.S.C. § 159A(d); 47 CFR § 1.1166. See *FY 2019 Report and Order* 34 FCC Rcd at 7577-78, paras. 49-53 (providing a detailed discussion of the statutory requirement and the information that should be submitted with the request). As the Commission has repeatedly noted, it interprets this provision narrowly to permit only those waivers “unambiguously articulating ‘extraordinary circumstances’ outweighing the public interest in recouping the cost of the Commission’s regulatory services for a particular regulatee.” *Id.* (citing *Implementation of Section 9 of the Communications Act, Assessment and Collection of Regulatory Fees for the 1994 Fiscal Year*, Report and Order, 9 FCC Rcd 5333, 5344, para. 29 (1994)).

⁴⁷ Kinéis Petition at 3.

⁴⁸ See *supra* note 8.

⁴⁹ *FY 2025 Regulatory Fees Report and Order*, 40 FCC Rcd at 7574, para. 42.

(NGSO) fee category have not received unconditional authorizations for all aspects of their applied-for systems, so other NGSO space station fee payors would have to pay more regulatory fees if those large constellation fee payors were no longer assessed regulatory fees under Kinéis's proposal.⁵⁰ The fact that it might be theoretically possible to analyze what constitutes a "critical" condition on an authorization that would preclude the licensee from initiating service without further agency action to avoid this administrative burden, does not change the fact that it would still be more difficult to administer than the proposal adopted. Moreover, such a proposal does not appear to best comport with the statute because it fails to ensure that regulatory fees be paid by all entities holding authorizations that benefit from the Space Bureau's licensing and regulatory activities. Furthermore, it undermines efforts to potentially lower the per unit regulatory fee burden by increasing the number of units on which fees are assessed.⁵¹ As such, we affirm that the concerns stated by the Commission were valid.

15. Kinéis also seeks reconsideration based on the alleged failure of the Commission to address potential alternatives that Kinéis suggests would allow regulatees to have a license or grant of market access but not pay regulatory fees.⁵² We note that the alternatives proposed by Kinéis originate from a fundamental misunderstanding of the basis for assessing regulatory fees. Kinéis's alternatives seek to address whether a license is final or subject to additional action by the licensee and the Commission, and whether it is fair to assess regulatory fees while these additional actions are yet to be taken. This misses the point entirely. As discussed above, regulatory fees are keyed to the FTE burden.⁵³ Even if a license is conditional and additional steps must be taken, by the licensee or the Commission, before the licensee can operate a space station under the license, there is still a license, and the licensee or authorization holder has benefitted, and continues to benefit from Space Bureau FTE resources used to review and grant licenses in the category of the fee payor and continue to have regulatory oversight over licenses in the payor's fee category.

16. In sum, we reject the alternatives proposed by Kinéis as fundamentally incorrect in both fact and law when Kinéis contends that the benefits of the regulatory process are manifested only once unconditional approval is received, and the Commission should not assess regulatory fees premised on these benefits absent "unfettered" authorization.⁵⁴ Not only does this ignore the longstanding regulatory fee framework required by Congress in keying our regulatory fee assessment to the relevant FTE burden, but it also improperly focuses on the fee assessment of a particular regulatee, rather than the category of fee payors as a whole. Accordingly, we reject the alternatives posed by Kinéis.

B. Recent Statements in a Notice of Proposed Rulemaking Do Not Support Reconsideration

17. Kinéis argues that its position that an authorization is not final when conditioned on the future submission of an orbital debris mitigation plan is supported by language in the *Space Modernization NPRM* adopted by the Commission in October 2025.⁵⁵ In the *Space Modernization NPRM*, the Commission sought comment on whether to allow the grant of a conditional space station authorization where an applicant did not provide an orbital debris mitigation plan, but instead certified its intent to comply with the Commission's orbital debris mitigation rules in a subsequent filing.⁵⁶ The conditionally authorized applicant would then be required to submit a compliant orbital debris mitigation

⁵⁰ *Id.* at 7574, para. 42 n.115.

⁵¹ *Id.* at 7574, para. 42.

⁵² Kinéis Petition at 4.

⁵³ *See supra* para. 12.

⁵⁴ Kinéis Petition at 5-6.

⁵⁵ *Id.* at 7 (citing *Space Modernization for the 21st Century*, SB Docket No. 25-306, Notice of Proposed Rulemaking, FCC 25-69, at 48, para. 128 (rel. Oct. 29, 2025) (*Space Modernization NPRM*)).

⁵⁶ Kinéis Petition at 7; *see also Space Modernization NPRM* at 48, para. 128.

plan or a modification application no later than six months prior to integration of satellites into a launch vehicle.⁵⁷ If the applicant files for a modification or seeks a waiver of Commission rules instead of submitting a fully compliant proposal, the conditional grant would be rescinded.⁵⁸ Kinéis argues that the proposal in the NPRM supports its position that a “conditionally approved applicant” has not yet been authorized.⁵⁹

18. As an initial matter, we will consider this argument even though it was not previously presented to the Commission because the *Space Modernization NPRM* was released after the August *FY 2025 Report and Order*.⁶⁰ Even so, we do not find that the statements in the *Space Modernization NPRM* support reconsideration. The Commission’s statements in the *Space Modernization NPRM* about the creation of new types of grants and processes reflect things that may or may not come to pass. Should the Commission adopt changes to its regulation of space and earth stations that impact the FTE resources allocated to the relevant regulatory fee categories and methodology used for such fee categories, those changes would be appropriately addressed in a future regulatory fees rulemaking rather than at this time in a reconsideration of a past regulatory fee rulemaking.⁶¹ In plain terms, whether any of the proposed changes, if adopted, will materially alter FTE resources devoted to the oversight and regulation of space stations sufficient to merit the Commission proposing changes to fee categories or methodologies is premature at this time. As such, we do not find that the statements in the *Space Modernization NPRM* support reconsideration of the Commission’s decision.

IV. ORDERING CLAUSES

19. Accordingly, IT IS ORDERED that pursuant to sections 1, 4(i), 4(j), and 405 of the Communications Act of 1934, as amended, 47 USC §§ 151, 154(i) 154(j), 155(c), and 405, and section 1.429(b) of the Commission’s rules, 47 CFR § 1.429(b), the Petition for Reconsideration filed on November 14, 2025 by Kinéis IS DENIED.⁶²

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

⁵⁷ Kinéis Petition at 7.

⁵⁸ *Id.*

⁵⁹ *Id.*

⁶⁰ 47 CFR § 1.429(b)(1).

⁶¹ As the Commission has repeatedly explained, apportionment of amounts to be collected from each fee category within a Bureau or Office based on FTE resources allocated is not required to be calculated with scientific precision. *FY 2025 Regulatory Fees Report and Order*, para. 11 & n.37 (citing *Central & Southern Motor Freight Tariff Ass’n v. United States*, 777 F.2d 722, 736 (D.C. Cir. 1985)). Reasonable approximations will suffice. *Id.*; *Mississippi Power & Light v. U.S. Nuclear Regulatory Comm’n*, 601 F.2d 223, 232 (5th Cir. 1979); *National Cable Television Ass’n v. FCC*, 554 F.2d 1094, 1105 (D.C. Cir. 1976).

⁶² Pursuant to Executive Order 14215, 90 Fed. Reg. 10447 (Feb. 24, 2025), this regulatory action has been determined to be not significant under Executive Order 12866, 58 Fed. Reg. 51735 (Oct. 4, 1993).