ITIF | INFORMATION TECHNOLOGY & INNOVATION FOUNDATION

700 K Street NW Suite 600
Washington, DC 20001

REPLY COMMENTS OF ITIF

to the

Federal Communications Commission

Washington, D.C.

In the Matter of:	)	
Ensuring Reliable Access to Spectrum for Space Launch Activities to Achieve the Goals of The President's National Space Transportation Policy	)	ET Docket No. 13-115 RM-12025

September 24, 2026

INTRODUCTION AND SUMMARY

The Information Technology and Innovation Foundation appreciates the opportunity to comment on ensuring reliable access to spectrum for space launch.[1] As more people rely on space-based services across multiple global industries, the need to expand the U.S. space economy is greater than ever. For the space economy to grow, there will need to be more space launches, and an increasing launch cadence will require additional spectrum resources. The Commission should create spectrum abundance for space launch and reentry through greater spectrum flexibility and improved coordination tools and procedures. However, the Commission need not upend existing coordination mechanisms to increase spectrum availability, especially because current coordination protects critical aviation flight-testing operations.

EXPANDING THE U.S. SPACE ECONOMY IS NECESSARY FOR CONTINUED GLOBAL LEADERSHIP

U.S. leadership in the global space economy is increasingly important as the sector grows rapidly and space-based capabilities underpin numerous other industries. The global space industry is projected to expand from $626.4 billion in 2025 to $1.01 trillion by 2034, and the United States stands to benefit from that growth if it maintains its technological leadership in space.[2] Major global industries, including communications, agriculture, finance, healthcare, and e-commerce, all rely on space capabilities to function.[3] This reliance means that growth in the global space sector will also drive growth and innovation in these industries.

The United States is also embroiled in a modern-day space race with China, and enabling continued growth of the U.S. space industry is critical to winning that race. The United States leads the global space economy thanks to leading technologies like reusable rockets and low-Earth orbit (LEO) broadband constellations.[4] However, China is quickly closing the innovation gap and has overtaken the United States in certain subsectors, such as Earth observation and remote sensing.[5] Leadership in the global space economy is essential for shaping the future of space exploration and how the orbital ecosystem is used to enhance the lives of everyone here on Earth. The Commission should not allow insufficient or poorly coordinated launch spectrum to become a bottleneck for these benefits.

---

[1] Founded in 2006, ITIF is an independent 501(c)(3) nonprofit, nonpartisan research and educational institute—a think tank. Its mission is to formulate, evaluate, and promote policy solutions that accelerate innovation and boost productivity to spur growth, opportunity, and progress. ITIF's goal is to provide policymakers around the world with high-quality information, analysis, and recommendations they can trust. To that end, ITIF adheres to a high standard of research integrity with an internal code of ethics grounded in analytical rigor, policy pragmatism, and independence from external direction or bias. For more, see: "About ITIF: A Champion for Innovation," https://itif.org/about; Public Notice, "WTB, OET, and SB Seek Comments On Ensuring Reliable Access to Spectrum for Space Launch Activities to Achieve the Goals of The President's National Space Transportation Policy," ET Docket No. 13-115 and RM-12025, FCC, August 25, 2026, https://docs.fcc.gov/public/attachments/DA-26-887A1.pdf, (Notice).

[2] Ellis Scherer, "How Innovative Is China's Space Industry?" ITIF, June 2026, https://www2.itif.org/2026-chinese-space-innovation.pdf, at 5.

[3] Ellis Scherer, "Policy Reforms to Launch U.S. Space Innovation," ITIF, January 2026, https://www2.itif.org/2026-space-policy-reform.pdf, at 5-6.

[4] Ellis Scherer, "How Innovative Is China's Space Industry?" at 8 and 12-13.

[5] *Id.* at 8-10.

ADDITIONAL LAUNCH CAPACITY IS NECESSARY TO EXPAND THE SPACE ECONOMY

There are numerous policy reforms necessary for the United States to maintain its lead over China and continue to grow its domestic space capabilities, and expanded launch capacity is one of the most important because growing the orbital ecosystem requires launching satellites at a faster cadence.[6] President Trump's National Space Transportation Policy (NSTP) correctly highlights that expanding launch capabilities is necessary to "ensure access to the full range of orbital regimes relevant to United States interests" and, critically, that spectrum for launch and reentry is a key part of launch capabilities.[7] Reaching the future launch cadence that the NSTP proposes will require greater spectrum access because each launch and reentry uses spectrum for telemetry, tracking, and control (TT&C) of the rocket.[8] The Commission is well equipped with existing regulatory tools to enable the United States to achieve its future launch goals.

THE COMMISSION SHOULD INCREASE SPACE LAUNCH SPECTRUM ABUNDANCE WITHOUT DRASTICALLY CHANGING EXISTING COORDINATION MECHANISMS

The NSTP tasks the Commission with "ensuring that commercial and Federal space launch, reentry, recovery, and on-orbit activities" have reliable spectrum access, which it can do without eliminating Part 87 third-party frequency coordinators.[9] The Commission should pursue space launch spectrum abundance through flexibility and by requiring current band coordinators to improve their operations. These methods will create more spectrum for launch while continuing to protect flight test operators in Aerospace Mobile Telemetry (AMT) bands.

Greater space spectrum flexibility is one method the Commission can use to generate greater spectrum abundance for space launch and reentry. For example, the Commission is currently looking at spectrum abundance for TT&C operations in its "Weird Space Stuff" proceeding.[10] ITIF proposed that the Commission enable flexible use in three bands in that proceeding because "allowing any technically compliant use of the bands is a better approach to generate long-term spectrum productivity."[11]

Following the same logic, the Commission could move some launch and reentry operations into the Weird Space Stuff bands because launch and reentry operations also involve TT&C, and the technical rules for those bands could be written to accommodate launch along with TT&C for spacecraft in orbit. Making space spectrum bands more flexible can thus generate spectrum abundance across numerous Commission space

---

[6] *See* Scherer, "Policy Reforms to Launch U.S. Space Innovation" at 16-17.

[7] President Trump, "The National Space Transportation Policy," White House, August 20, 2026, https://www.whitehouse.gov/presidential-actions/2026/08/national-security-presidential-memorandum-nspm-17/.

[8] *See* Scherer, "Policy Reforms to Launch U.S. Space Innovation" at 11.

[9] *See* The National Space Transportation Policy at Section 2(g); CSF Petition, RM-12025, August 4, 2026, https://www.fcc.gov/ecfs/document/26110069483/1.

[10] "Notice of Proposed Rulemaking In the Matter of Spectrum Abundance for Weird Space Stuff," SB Docket No. 26-54, FCC, March 26, 2026, https://docs.fcc.gov/public/attachments/FCC-26-13A1.pdf.

[11] Ellis Scherer, "Comments of ITIF to the FCC In the Matter of Spectrum Abundance for Weird Space Stuff," SB Docket No. 26-54, May 11, 2026, https://www2.itif.org/2026-fcc-spectrum-abundance.pdf, at 4.

priorities and aligns more generally with a shift in spectrum policy towards flexibility, which increases productivity.[12]

Another way to create space launch spectrum abundance is to improve existing spectrum coordination operations. The Commercial Space Federation's (CSF) petition encourages the Commission to replace the Aerospace and Flight Test Radio Coordinating Council (AFTRCC) with a light licensing database like the one used in the 70/80/90 GHz band.[13] CSF's main argument is that AFTRCC cannot coordinate space launch and AMT spectrum needs as efficiently as necessary to accommodate modern launch cadences.[14] While this is a valid concern, the Commission does not need to eliminate all Part 87 frequency coordinators to address the issue. Instead, the Commission could require all Part 87 coordinators to work toward modernized coordination methods, including databases like the one CSF proposes.

The record does not identify coordination failures in space launch operations significant enough to merit a complete overhaul of the frequency coordinator system, but it does suggest information sharing is less timely and more cumbersome than it needs to be. The Commission could revise the language in Section 87.305(a)(1) to require frequency advisory committees to improve and automate their operations whenever possible. New rules could also require coordinators to facilitate information sharing from all users that maximizes the amount of data exchanged between conflicting parties without jeopardizing classified or proprietary information. These measures would benefit both aviation and space operators by making spectrum coordinators more agile, enabling coordination closer to launch windows, and providing sufficient information for AMT and space operators to understand why conflicts arise. For the United States to eventually achieve the launch cadence that the NSTP proposes, spectrum coordination must be capable of near real-time interference deconfliction.

CONCLUSION

Rapidly advancing space capabilities and the space race with China necessitate the continued expansion of the industry, which begins with greater launch capabilities. Spectrum is a critical component for space launch, and frequency coordinators play a vital role in balancing the spectrum needs of the aviation and the space sectors, both of which are essential for American technological leadership. The Commission should take whatever actions it can to generate greater spectrum abundance for space launch, but it does not need to comprehensively reform spectrum coordination to do so.

Thank you for your consideration.

Ellis Scherer
Policy Analyst, Broadband and Spectrum Policy

---

[12] Ellis Scherer and Elizabeth Sanchez, "Rigid Space Spectrum Allocations Could Limit Productivity," ITIF, July 1, 2026, https://itif.org/publications/2026/07/01/rigid-space-spectrum-allocations-could-limit-productivity/.

[13] CSF Petition at iii.

[14] *Id.*