The Daily Dish

LEO and Assembly Line Licensing

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If you are like me, you didn't spend a lot of time thinking about satellites or how the Federal Communications Commission (FCC) regulates them. But all of that changed when I read Streamlining Satellite Licensing: A Space Modernization Odyssey by Nick Krosse. I hadn't focused on the fact that:

> *For much of the twentieth century, geostationary Earth orbit (GEO) satellites the size of school buses dominated commercial space communications. They were made to spec and launched to an orbit precisely 22,236 miles above sea level over the equator. Relatively few GEO satellites were needed to serve basic communication services such as international telephone and television broadcast relay to the entire globe, but their distance from the Earth and availability of radio spectrum limited their bandwidth.*

Amazing stuff. Now, however:

> *Advances in satellite manufacturing and the rapidly decreasing cost of rocket launches have made space-based broadband offered by low Earth orbit (LEO) "constellations"—clusters of hundreds or thousands of small satellites closer to Earth—available to more Americans, increasing connectivity options for consumers.*

This is cool.

At AAF we talk about the importance of technological advances all the time. And we talk about the need for a light, nimble regulatory state. But there is rarely such a clean example of the former forcing a shift in favor of the latter. In this case, the small number of GEO communications satellites meant that the FCC could essentially have a tailor-made review for each satellite application for spectrum. The vastly larger number of LEO satellites makes

this unworkable.

In response, the FCC has developed a modular licensing process in which the default FCC position is “approve” when operators can attest that their systems operate within specified parameters, and the FCC only does a full review when that is not the case. (Krosse has much more detail.) The result?

> *Modularizing the licensing process also allows the commission to create a “licensing assembly line,” where the commission can review individual modules in parallel. While some modules necessarily interact with each other, parallel review means those modules requiring more scrutiny won’t hold up review of an entire application. When a module requires more review, such as coordination in a given spectrum band, the commission can grant conditional approval for the rest of the application so that the operator may move forward with deployment (although, in this example, they would not be able to transmit in that band before final approval).*

In addition, Congress is getting in on the reforms by revising the FCC’s regulatory authority over communications satellites, although the proposed Satellite and Telecommunications Streamlining Act has not yet passed the House or Senate. Still, the FCC reforms are significant in and of themselves.