



August 19, 2019

The Honorable Stephen Dickson
Administrator
U.S. Federal Aviation Administration
800 Independence Avenue, SW
Washington, D.C. 20591

Re: Streamlined Launch and Reentry Licensing Requirements Rulemaking (FAA-2019-0229)

Dear Administrator Dickson:

The aviation community, represented by our respective organizations, agrees that safety and efficiency are key principles that must be included in the FAA's final rule covering commercial space licensing. It is vital to integrate commercial space users into the National Airspace System (NAS), rather than segregating these operations and penalizing aviation users.

Our individual organizations will offer specific comments on the Streamlined Launch and Reentry Licensing Requirements proposed rules, but there are several areas that we collectively want to bring to your attention.

We strongly urge the FAA to develop a performance-based final rule that incorporates airspace efficiency into the licensing process and considers the effects on all NAS users. The FAA estimates that commercial space operations may nearly double by 2023; therefore, it is crucial that the FAA preserve the aviation industry's \$1.6 trillion annual U.S. economic activity, which accounts for 5.1% of the U.S. GDP. Although the document has not yet been finalized, the FAA should consider incorporating the upcoming recommendations of the Airspace Access Priorities Aviation Rulemaking Committee into this licensing overhaul.

The FAA should ensure that the safety requirements for commercial space certification and operations, particularly those addressing the risks to other aviation users, are commensurate with the expectations of the flying public. Ensuring safety is vital for a growing commercial space industry and is the path for true integration into the NAS. The commercial space industry should leverage the experiences from the aviation industry to attain record levels of safety through collaboration and information sharing. Programs modeled after the Aviation Safety Information Analysis and Sharing Program (ASIAS) are the means for advancing commercial space safety.

There are several associated initiatives that do not need to wait for the completion of the rulemaking process. This includes the formalization of time-based launch procedures under development by the Joint Space Operations Group (JSpOG) located at the Air Traffic Control System Command Center. We also encourage the FAA to move forward with programs to ensure safe commercial space integration including: improvement of existing procedures; the development of new procedures to improve launch planning; the creation of ATC surveillance and tracking capabilities to include automated depictions of hazard areas and launch vehicles; improved and uniform hazard mitigation policies; and two-way communications. These tools will help the FAA achieve the sought-after integration of commercial space.

Likewise, it is important for the commercial space industry to become a participant in the Collaborative Decision-Making Process as a step toward normalizing these operations. We also believe that the implementation of Space-based ADS-B provides enhanced surveillance capabilities that will augment the FAA's ability to more efficiently manage traffic in addressing increasing commercial space activity.

It is also critical that the commercial space licensees pay into the system to help cover the costs they are imposing on the system. This would be consistent with commercial airlines and general aviation that have long supported the government's air traffic management system and airport improvements through various taxes and fees on the transportation of people and cargo, as well as fuel excise taxes.

The aviation community is committed to the safe and efficient integration of commercial space into the NAS and looks forward to working with the FAA as the rules covering these operations are developed.

Sincerely,



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President
Air Line Pilots Association



Nicholas E. Calio
President and CEO
Airlines for America



Mark R. Baker
President and CEO
Aircraft Owners and Pilots Association



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