



September 6, 2022

Re: Expanded Role of the OSC in Space Sustainability

The National Space Society (NSS), American Institute of Aeronautics & Astronautics (AIAA), and Secure World Foundation (SWF) hope that the U.S. Government will continue to close critical gaps in the knowledge and capabilities needed to meet the current and growing challenges of orbital debris risk management. We believe in a comprehensive approach for addressing orbital debris issues. Such an approach must effectively use Space Situational Awareness (SSA), Space Traffic Management (STM) (i.e. norms of responsible behavior), mitigation, and remediation. With regards to SSA and STM, the Office of Space Commerce (OSC) is well-positioned to centralize and direct debris efforts.

The OSC sits within the National Oceanic and Atmospheric Administration (NOAA), a bureau within the Department of Commerce (DOC), as part of the National Environmental Satellite, Data, and Information Service (NESDIS). Its mission is to foster an economic and policy regime that maximizes the success of the U.S. commercial space industry. In the Fiscal Year 2022, OSC has a budget of \$16 million and will continue to develop the Open-Architecture Data Repository (OADR). This public, cloud-based SSA database provides an innovative mechanism for promoting cooperation in commercial SSA data sharing. But these resources are not enough.

Currently, the OSC is both understaffed and underfunded, and lacks a high enough organizational placement to provide the necessary oversight for commercial space activity. The U.S. Administration's Space Policy Directive-3 (SPD-3) in 2018 called for the DOC to take a central role in STM and SSA. In support of the Directive, the National Academy of Public Administration (NAPA) in August 2020 recommended that the OSC be selected to conduct crucial SSA and STM missions. We reiterate our support of these findings. The OSC needs more visibility and authority to promote and regulate an industry valued at over \$150 billion and representing critical infrastructure. This will also help unify interagency collaboration efforts for the commercial sector, which involve the National Aeronautics and Space Administration (NASA), NOAA, the Federal Communications Commission (FCC), and the Federal Aviation Administration (FAA).

The OSC should be elevated to the Office of the Secretary of Commerce. And eventually a Bureau of Space Commerce needs to be established. The bureau director will be the Assistant Secretary for Space Commerce, reporting directly to the Secretary of Commerce. In tandem to these organizational shifts OSC should be appropriated adequate funding of over \$90 million to hire professional staff and create new SSA and STM initiatives.

We urge the U.S Government to expand the role of the OSC and provide the required funds to make the current SSA and STM mission a success. This will be necessary for addressing the challenges posed by orbital debris to the space environment. OSC will be empowered to further implement SPD-3 and prioritize the SSA characterization of orbital debris; the improved data

processing, sharing, and filtering of debris catalogs; and the development of debris models for risk and cost-benefit analysis.

We hope this next year brings us a step closer to a sustainable space environment. That stability will allow us to use the vast resources of space for the dramatic betterment of humanity.

Best,

Adam Brodtkin
Orbital Debris Policy Program Manager
National Space Society

Endorsed by:

Anita Gale
Chief Executive Officer
National Space Society

Dan Dumbacher
Executive Director
American Institute of
Aeronautics &
Astronautics

Dr. Peter Martinez
Executive Director
Secure World Foundation