

ALERT

# FCC Releases Draft Proposal for Sweeping Space Modernization Reforms

October 10, 2025

On October 7, 2025, the Federal Communications Commission (FCC) released a draft Notice of Proposed Rulemaking (NPRM) that would seek comment on major reforms to its space and earth station licensing frameworks. The draft NPRM proposes a comprehensive modernization and reorganization of the satellite and earth station rules from Part 25 into a new Part 100, as well as significant changes to the licensing process, processing rounds, milestones, and information sharing. Below, we summarize several key proposed changes in the expansive item. The draft NPRM is currently scheduled for consideration by the Commission at its October 28 Open Meeting. If adopted, comments will be due 45 days after publication in the Federal Register.

## New Licensing Frameworks and “Presumed Acceptable” Criteria

The draft NPRM takes a holistic look at the FCC’s licensing processes and aims to shift applications towards a “presumed acceptable” process, whereby applications certifying compliance with specific brightline criteria would be eligible for expedited application processing. The item proposes applying this certification-based framework to its existing licensing categories, as well as to brand-new licensing categories.

Those brand-new categories include a new “Variable Trajectory Space System” (VTSS) license type for in-space assembly and manufacturing (ISAM), lunar, and other operations that go beyond the Commission’s current non-geostationary orbit (NGSO)/geostationary orbit (GSO) paradigm, as well as a new license type for multi-orbit satellite systems (MOSS), which may include GSO, NGSO, and VTSS satellite systems.

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In addition, the draft item proposes transitioning earth station licensing to a framework that mainly relies on blanket licensing and creates a new “Immovable” earth station licensing model, based on the 70/80/90 GHz site registration framework. “Immovable” earth station licensing would only be available to certain types of fixed earth stations that certify compliance with brightline criteria, in line with the FCC’s proposed approach for other license applications.

The draft NPRM also proposes a new definition of “NGSO system,” which would refer to one or more NGSO satellites operating under one call sign. For GSOs, the item proposes to permit multiple GSO satellites to be licensed under one call sign.

### **Space Safety and Operations**

Satellite operators would be required to share ephemeris data with approved space situational awareness (SSA) services and to submit semi-annual space safety reports. Operators would also have authority for orbit-raising operations within their existing telemetry, tracking, and command (TT&C) authority without acquiring additional approval. For GSO operators, the two-degree spacing rule would apply only to operations to and from the United States.

### **Processing Rounds, Bonds, and Milestones**

The draft NPRM includes a proposed overhaul of processing rounds for NGSO systems and bonds and milestones for NGSO and GSO systems. The FCC proposes to predetermine spectrum bands available for processing rounds and to open processing rounds for these bands each calendar year, such that each NGSO applicant who files in a particular year and spectrum band would have equal spectrum priority, subject to a 10-year sunset, with priority determined by date of grant for applicants in subsequent processing rounds. Only systems proposing 200 or more satellites would be automatically included, though smaller systems could request to be included. Applicants within a processing round would be required to pay a surety bond.

Once granted, milestones for NGSO systems would be aligned with ITU milestones, with 50% of satellites required to be launched within 12 years and 100% launched within 14 years. On the other hand, the FCC proposes to eliminate GSO milestones entirely, and invites comment on replacing them with a launch contract requirement.

### **Application Processing**

The item proposes eliminating 30-day Special Temporary Authority (STA), and for certain earth station 60-day STA applications to be deemed granted upon receipt of the application and filing fee. The draft NPRM also proposes providing “conditional grants” under certain circumstances.

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If you are interested in filing comments or have questions, please contact one of the attorneys listed on this alert or the Wiley attorney who routinely handles your FCC matter.