

The Akin logo is displayed in a white, serif font against a blue background.A satellite with solar panels is shown in space against a blue background.

Space Law, Regulation and Policy Update

December 20, 2024

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Good Afternoon!

NORAD may not have fired up the Santa Tracker just yet, but the first two weeks of December have been chock full of presents for the space industry, with the FAA digging into licensing reform, NASA deciding humans will remain in LEO after the ISS, and the Artemis accords adding Austria, Panama and Thailand to reach 51 signatories.

All this and more in this week's edition of Akin's Space Law, Regulation and Policy newsletter.

Reminder

Public comments are due Monday, December 23rd on the proposed ITAR and EAR updates to export controls on space-related items and activities.

Comments on the rules may be submitted to the Federal rulemaking portal at www.regulations.gov. For the EAR rule, the *regulations.gov* ID for this rule is BIS-2018-0029 and submitters should refer to RIN 0694-AH66 in all comments. For the ITAR rule, the ID is DOS-2024-0035 and submitters should refer to RIN 1400-AE73 in the comments. For the ITAR rule, you may also email your comments to DDTCTPublicComments@state.gov with the subject line: "Regulatory Change: Categories IV and XV RIN 1400-AE73."

Akin Spotlight

Introducing Akin's [Policy Pulse](#), a comprehensive hub and bi-weekly newsletter, thoughtfully crafted by members of our bipartisan lobbying & public policy, regulatory and litigation practices to serve as your go-to resource for essential insights, in-depth analyses and practical political tools following the 2024 U.S. Elections.

[Subscribe here](#) to receive bi-weekly *Policy Pulse* updates on the potential agenda for the 119th Congress and the incoming administration.

A dark blue banner with the text "On The Hill" in white, serif font. A large, light blue triangle is partially visible on the right side of the banner.

On The Hill

Articles and Quotes

Wittman, Graves Urge FAA to Expedite Launch Licensing Reforms to Bolster U.S. Space Leadership (Rep. Rob Wittman)

On December 6, Reps. Rob Wittman (R-VA) and Sam Graves (R-MO) sent a [letter](#) to FAA Administrator Michael Whitaker urging the agency to expedite its launch and reentry licensing regulation reforms for commercial space entities under part 450. The letter criticized lengthy pre-application review processes and cited regulatory delays as having a direct impact on advancing U.S. space capabilities and strategic competition.

Rogers Gives Speech on Space Force and its Future (House Armed Services Committee Majority)

On December 17, Chair of the House Armed Services Committee Mike Rogers (R-AL) spoke at a Center for Strategic and International Studies (CSIS) Aerospace Security Project reflecting on the accomplishments and mission of the Space Force five years after its founding. While Rogers celebrated the accomplishments of the branch, he called for several policy shifts within it: prioritization of the commercial space sector, removal of classification barriers and joint force integration, among others. His full speech can be viewed [here](#).

Cole Announces New Republican Committee Members for the 119th Congress (House Appropriations Committee Majority)

On December 13, House Appropriations Chair Tom Cole (R-OK) announced the new Republican Appropriations Committee members for the 119th Congress: Rep. Mark Alford (R-MO), Rep. Nick LaLota (R-NY), Rep. Dale Strong (R-AL), Rep. Celeste Maloy (R-UT) and Rep. Riley Moore (R-WV).

Introduced Legislation & Legislative Updates

On Wednesday, December 18, the FY25 National Defense Authorization Act (NDAA; [H.R. 5009](#)) passed the Senate by a vote of 85-14. The bipartisan bill, which passed the House 281-40 on December 11, was sent to the President's desk for signing. You can find the full bill text [here](#).

Please find our Space Legislation Tracker [here](#).

Recent and Upcoming Congressional Hearings (Dec 20 - Jan 3, 2024)

The House and Senate are out of session until January 3, 2025.

In the White House/Executive Branch



Articles and Quotes

FAA Takes Step to Streamline Launch Licensing Process (SpaceNews)

On December 13, the FAA announced steps to streamline the launch licensing process, accepting flight safety analyses from federal ranges at key sites, including Vandenberg and Cape Canaveral. This move reduces duplication of safety reviews and paperwork for operators under Part 450 regulations. Industry advocates, including COMSTAC, have pushed for this reform to improve efficiency since 2023. Meanwhile, the FAA is also reviewing Part 450 through its new SpARC rulemaking committee. Congressional advocates have urged the agency to accelerate reforms to support the commercial space sector's growth.

“Continuous Heartbeat” Wins the Day in NASA’s LEO Microgravity Strategy (Space Policy Online)

NASA has adopted a “continuous heartbeat” strategy for Low Earth Orbit (LEO) microgravity operations, ensuring uninterrupted human presence to advance research, technology and operational skills. The strategy supports the transition from the International Space Station to commercial LEO destinations (CLDs) like those under development by Axiom Space and Blue Origin. With 13 goals and 44 objectives, NASA aims to sustain innovation, expand international collaboration, and prepare for lunar and Mars missions. Challenges include funding, sustaining astronaut access and fostering a viable commercial market.

FAA Administrator to Resign on Trump Swearing-in (The Hill)

FAA Administrator and Biden-appointee has announced that he will resign on Inauguration Day, January 20. President-elect Trump has yet to name a nominee to fill the post, though he has nominated Fox News contributor and former Rep. Sean Duffy (R-WI) to head the Department of Transportation. Whitaker, a former deputy FAA Administrator, has held the office since October 2023 after being unanimously confirmed by the Senate.

Space Force Plans Billions in Spending on Launch Infrastructure (Air and Space Forces)

The U.S. Space Force is investing billions in its “Spaceport of the Future” initiative to upgrade launch infrastructure at Cape Canaveral and Vandenberg. Funded at \$1.3 billion through 2028, the program includes 192 projects aimed at modernizing aging facilities, increasing launch capacity, and supporting the surge in commercial launches. Upgrades include burying power lines, expanding roads and enhancing wastewater systems. The initiative also involves collaboration with industry under a \$4 billion Space Force Range Contract. These efforts aim to meet rising demand and ensure operational efficiency for national security and commercial missions.

NDAA Extends Commercial Spaceflight Learning Period and Launch Indemnification (SpaceNews)

The FY25 NDAA, passed by the Senate on December 18 and expected to be signed by President Biden, aims to extend two provisions related to commercial space launches. Language included in the bill will extend the “learning period,” which limits FAA regulations on commercial human spaceflight as it pertains to personnel safety requirements, through the end of 2027. The legislation also aims to extend the practice of launch indemnification, in which the government pays third-party damages beyond what is covered by a licensee’s insurance, through September 2028. You can find the full bill text [here](#).

OSTP Releases Cislunar Science and Technology Plans (SpaceNews)

On December 18, the Biden-Harris Administration’s Office of Science and Technology Policy (OSTP) published a [memorandum](#) that directs the government to establish lunar “common reference systems,” which serve as means of marking cislunar direction and position. OSTP director Arati Prabhakar referred to the systems as foundational as cislunar activities and lunar infrastructure continue to be defined and built. OSTP also released a [report](#) titled the “National Cislunar Science & Technology Action Plan,” which outlines the implementation of a 2022 OSTP [strategy](#) of the same title. The plan seeks to support R&D for cislunar

activities, bolster cislunar space situational awareness (SSA), create cislunar communication and navigation systems, and strengthen international science cooperation.

Federal Agency Space News

Defense Department

[Joint Statement From The Combined Space Operations Initiative Principals' Board Meeting in Italy to Advance Space Security](#) (December 6, 2024)

[Commercial Tech at Heart of Future Defense Spectrum Management](#) (December 12, 2024)

Federal Aviation Administration

[DHS, FBI, FAA & DoD Joint Statement on Ongoing Response to Reported Drone Sightings](#) (December 17, 2024)

National Aeronautics and Space Administration

[2024 NESC Technical Update](#) (December 12, 2024)

[NASA Outlines Latest Moon to Mars Plans in 2024 Architecture Update](#) (December 13, 2024)

[NASA Finalizes Strategy for Sustaining Human Presence in Low Earth Orbit](#) (December 16, 2024)

[NASA Names New Leader of STEM Engagement](#) (December 16, 2024)

U.S. Space Force

[Remarks by CSO Gen. Chance Saltzman at the 2024 Space Force Association's Spacepower Conference](#) (December 10, 2024)

[US Space Force Leaders Engage with Allies in Japan](#) (December 10, 2024)

[ACSO Air Marshal Godfrey Highlights Three Key Lines of Effort as Future of Space Superiority](#) (December 11, 2024)

[USSPACECOM Commander Describes 'Common Playbook' For Warfighting Advantage](#) (December 13, 2024)

International

Articles & Quotes

[Artemis Accords Reach 50 Signatories with Panama and Austria](#) (*SpaceNews*)

On December 11, Panama and Austria both signed the Artemis Accords, marking a milestone of 50 signatories. The Accords, which outline best practices for responsible space exploration and resource utilization, “stand at the center of our civil space diplomacy efforts,” said the acting assistant secretary of the Bureau of Oceans and International and Scientific Affairs within the State Department. NASA Administrator Bill Nelson noted that the agency will “hand the baton” to the incoming Trump administration to continue the effort.

Thailand Signs Artemis Accords (SpaceNews)

On December 16, Thailand became the 51st nation to sign the Artemis Accords, just days after the signings of Panama and Austria brought the Accords to 50 signatories. Thailand is the first Artemis Accords signatory who has also pledged participation in the International Lunar Research Station (ILRS), a Chinese-led effort with similar principles of international space cooperation. U.S. officials have stated that Artemis nations are permitted to be ILRS signatories.

Check out below for comment opportunities, requests for proposals, notices of proposed rulemaking and a look at the week ahead in space events:

Comment Opportunities (RFIs)

Subcontracting Plans

National Aeronautics and Space Administration, Defense Department

Close Date: Feb 4, 2025

Ames High-Rate Composite Manufacturing Facility (AHRCM)

National Aeronautics and Space Administration

Close Date: Feb 7, 2025

Certain Federal Acquisition Regulation Part 9 Requirements

National Aeronautics and Space Administration, Defense Department

Close Date: Feb 18, 2025

Notice of Intent To Prepare an Environmental Impact Statement for Authorizing Changes to the Falcon Launch Program at Vandenberg Space Force Base

Air Force Department

Close Date: N/A

Requests for Proposals (RFPs)

Safety and Mission Assurance Services (SMAS) II

National Aeronautics and Space Administration

Close Date: Jan 13, 2025

Mechanical and Composite Hardware Fabrication Support Services 2 (MCHFSS 2)

National Aeronautics and Space Administration

Close Date: Jan 23, 2025

Human Health and Performance Contract 2 (HHPC2)

National Aeronautics and Space Administration

Close Date: Jan 30, 2025

ROSES 2024: A.48 Commercial Satellite Data Earth Science Research and Applications

National Aeronautics and Space Administration

Close Date: Jan 31, 2025

Amendment 10-SEWP VI Final RFP & Batch 6 Q&A (6th Generation of Solutions for Enterprise-Wide Procurements)

National Aeronautics and Space Administration
Close Date: Feb 17, 2025

Minority University Research and Education Project (MUREP) Aeronautics Community & Environmental Impact Research (ACEIR)

National Aeronautics and Space Administration
Close Date: Mar 3, 2025

ROSES 2024: A.65 Responsive Science Initiatives Research

National Aeronautics and Space Administration
Close Date: Mar 25, 2025

TACTICAL Broad Agency Announcement (BAA)

Defense Department
Close Date: Nov 22, 2028

Notices of Proposed Rulemakings (NPRMs)

Federal Acquisition Regulation: Inflation Adjustment of Acquisition-Related Thresholds

Department of Defense, National Aeronautics and Space Administration
Close Date: Jan 28, 2025

Upcoming Space Events

SciTech Forum

American Institute of Aeronautics and Astronautics
January 6-10, 2025

Small Bodies Assessment Group

National Aeronautics and Space Administration
January 7-9, 2025

AAS Winter Meeting

American Astronomical Society
January 12-16, 2025

Safeguarding Radio Frequency Spectrum for a Sustainable Future

European Space Policy Institute
January 15, 2025

Innovate Space: Finance Forum

Space Foundation
January 22-23, 2025

Commercial Space Week

SpaceCom

January 27-30, 2025

17th European Space Conference

Business Bridge Europe

January 28-29, 2025

Interagency Astronomy and Astrophysics Advisory Committee

NSF, NASA, DOE

January 30-31, 2025

Defense and Intelligence Space Conference

National Security Space Association

February 10-12, 2025

Global Space Technology Convention and Exhibition

Singapore Space and Technology Ltd

February 26-27, 2025

Global Space Law Center Annual Symposium

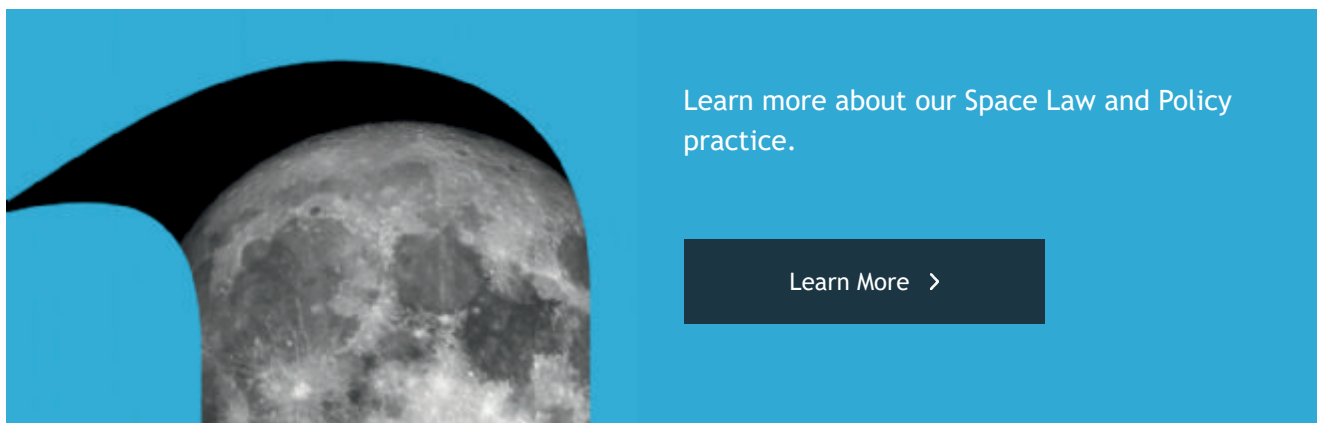
Cleveland State University College of Law

February 13, 2025

Space Beach Law Lab

Space Beach

March 25-27, 2025



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