CRSRA Update and Guidance Circulars

National Environmental Satellite, Data, and Information Service

August 24, 2022

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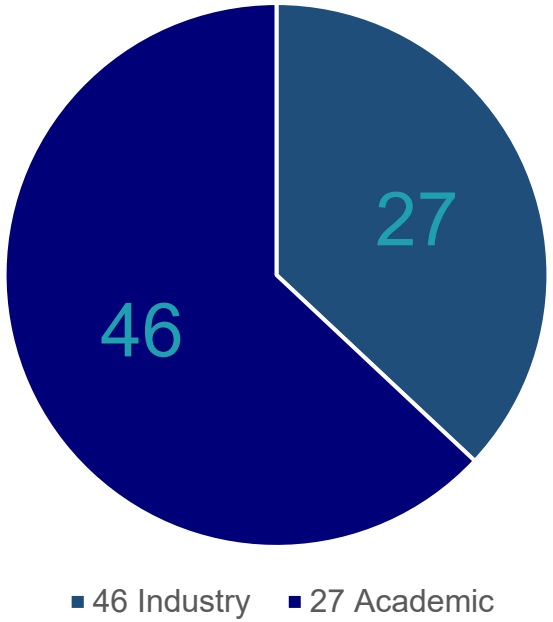
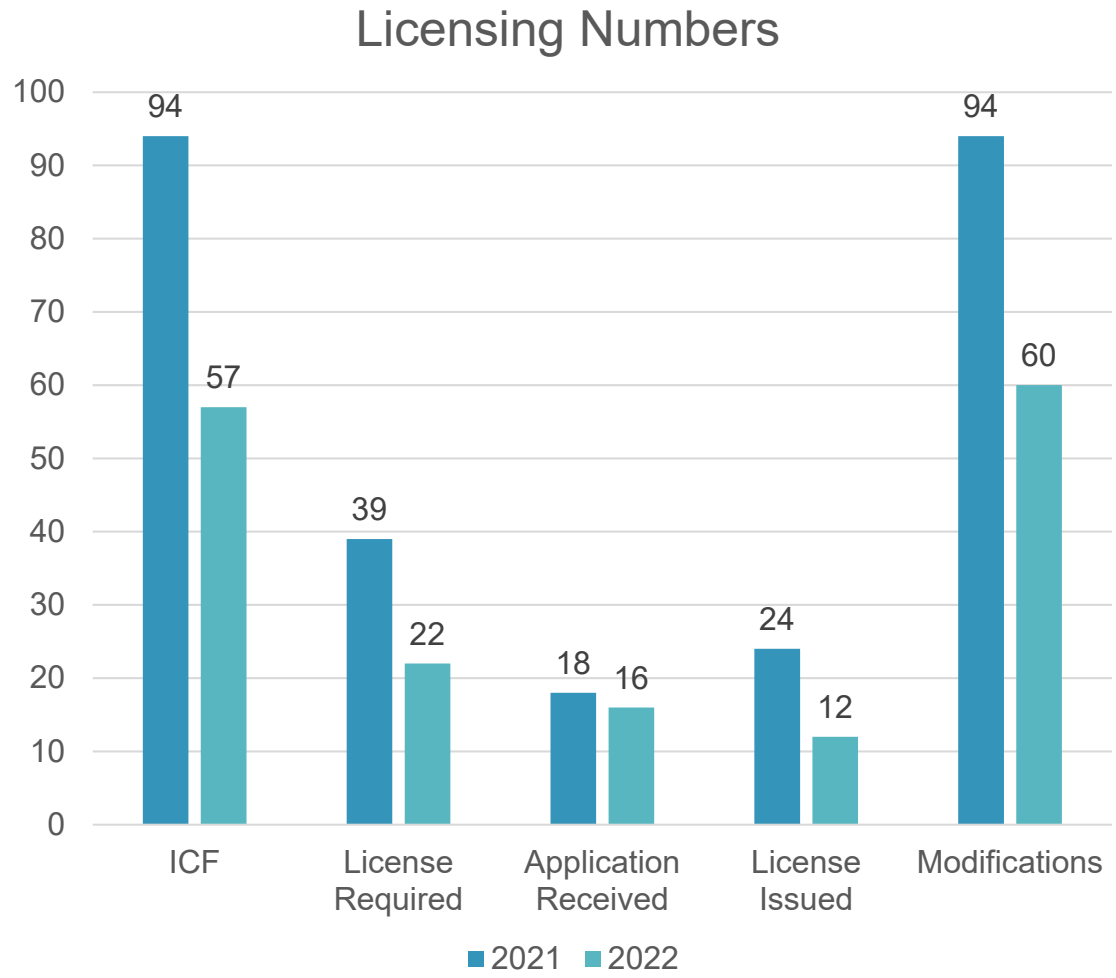
Licensing Statistics

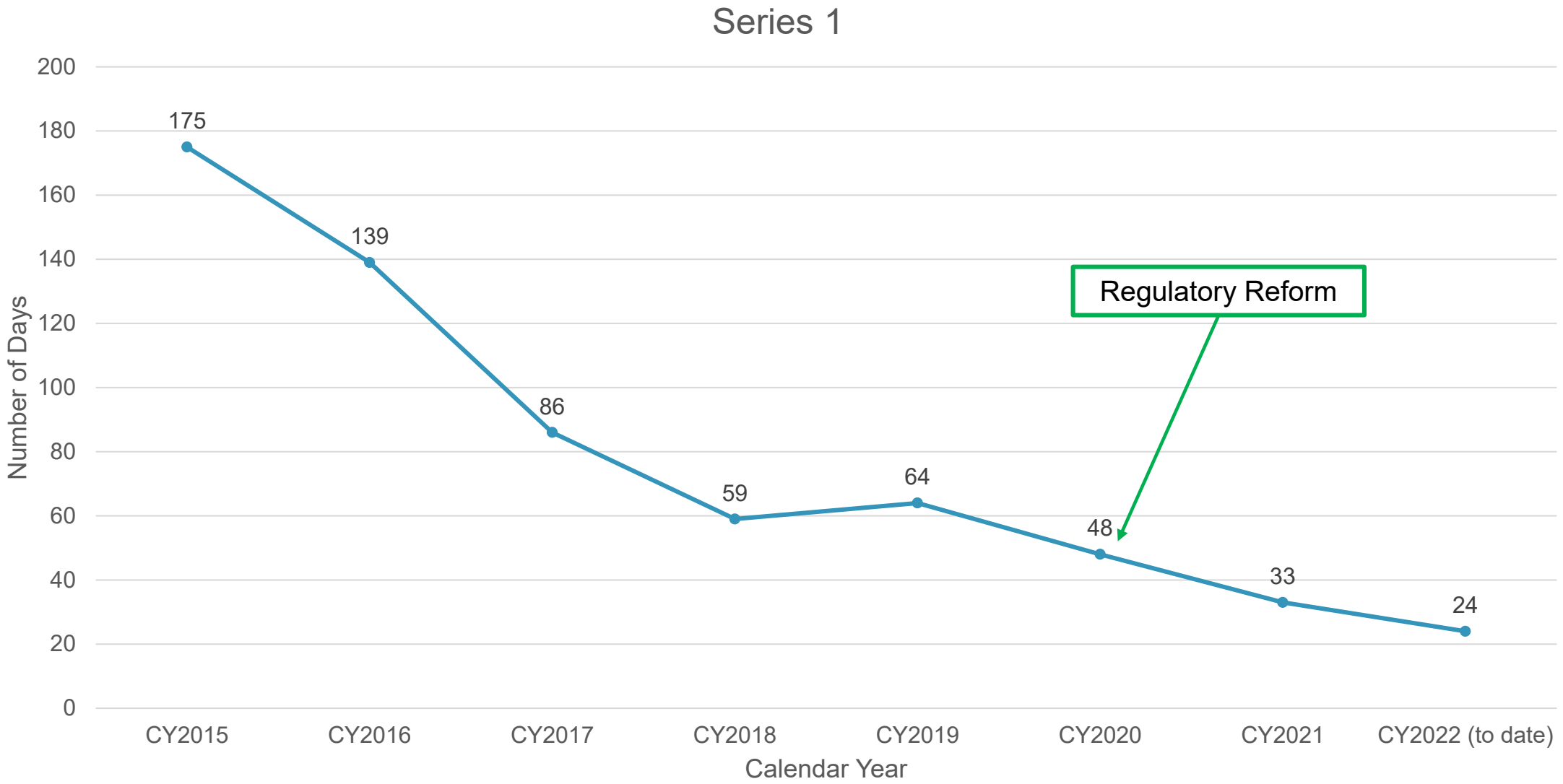
73 Current Licensees



Out of 206 historical licenses, there are 98 active licenses that include 1,220 satellites of which 413 are on orbit.



Licensing Statistics



Compliance Inspections

- 762 licensed ground stations
  - 418 active
  - 178 inspected

- Priorities
  - T2 & T3 MCC
  - IA interests

- 44 sites inspected since July 2021
  - Resulting in 8 investigations

Purpose

The purpose of this working session is to discuss the growing set of Guidance Circulars (GCs) that are being developed and published by CRSRA.

Committee members may:

- **Suggest new topics for development into future GCs**
- **Suggest edits to existing GCs**

Definition

Guidance Circulars (GC) are intended to provide clarity to the public regarding existing requirements under the law or NOAA regulations or processes.

- **Living documents that are continuously updated**
- **Do not have the force and effect of law**
- **Published at https://www.nesdis.noaa.gov/commercial-space/regulatory-affairs/licensing/authorities**

Current Guidance Circulars

Published

- US Person/Operating
- Scope of Affiliates and Subsidiaries
- Radar General Image Quality Equation (RGIQE)
- Mission Assurance
- Submitting Data from Tier 3 Remote Sensing Systems for Evaluation
- Cybersecurity

In Development

- Ground Station Classification and Testing
- Instrument Classification and Tiering Using FWHM

US Person/Operating

- Applicable Regulation: 15 C.F.R. 960.4
- Outlines the jurisdiction of CRSRA's authority by defining the terms "operate," "person," and "U.S. Person"
- Provides general examples of various domestic and international corporate structures

Scope of Affiliates and Subsidiaries

- Applicable Regulation: 15 C.F.R. 960.16
- Further outlines the jurisdiction of CRSRA's authority by defining terminology related to "subsidiaries or affiliates that play a role in the operation of the system"
- Provides further examples of domestic and international corporate structures

Radar General Image Quality Equation (RGIQE)

- Applicable Regulations: 15 C.F.R. 960.6(a); Appendix A
- Defines CRSRA's methodology for comparing the capabilities of synthetic aperture radar (SAR) systems using the RGIQE equation
- Provides example calculations for various SAR systems

Mission Assurance

- **Applicable Regulation: 15 C.F.R. 960.2(b)**
- **Defines CRSRA's methodology for determining whether a remote sensing instrument qualifies for the mission assurance exemption (*i.e.* does not require a license)**
- **Provides examples of instrument types and use cases**

Submitting Data from Tier 3 Remote Sensing Systems for Evaluation

- Applicable Regulation: 15 C.F.R. 960.10(b)
- Outlines CRSRA's process for collecting and evaluating data from Tier 3 Licensees for the purpose of starting the one-year clock on temporary license conditions
- Provides examples of data types and formats, as well as transfer processes and protection requirements

Cybersecurity

- Applicable Regulation: 960.9(a)-1

- Provides CRSRA's view of successful cybersecurity measures, identifying those that are required, so that operators can develop and operate a system that is resilient to cyber attacks.

- Provides extensive references as well as a detailed process for each segment of a space system

Ground Station Classification and Testing

- Applicable Regulation: 15 C.F.R. 960, Appendix A
- Defines CRSRA's classification system and requirements for the inclusion of ground stations in applications and licenses related to standard use and testing purposes
- Provides examples of various ground station types and use cases

Instrument Classification and Tiering Using FWHM

- Applicable Regulation: 15 C.F.R. 960, Appendix A
- Defines CRSRA's methodology for the classification and comparison of remote sensing instruments based on phenomenology, intended use, and spectral range using full width half maximum (FWHM)
- Provides examples of various types and use cases

ACCRES Working Discussion

- Other items or areas should CRSRA consider for GCs?
  - Develop a list of items with initial/target high-level details
- Changes to existing GCs??
  - Committee to make recommendations for changes