**Before the**
**Federal Aviation Administration, U.S. Department of Transportation**
**1200 New Jersey Avenue SE, West Building, Ground Floor (W12-140)**
**Washington, DC 20590-0001**

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| In the Matter of | ) | |
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| Request for Information: | ) | Docket No. FAA-2026-9736 |
| Siting New Spaceports and Use of Priority Airspace for | ) | |
| Critical Space Launch Corridors | ) | |

**COMMENTS OF THE SECURE WORLD FOUNDATION**

1. The Secure World Foundation ("SWF") hereby submits comments in the above-captioned Request for Information ("RFI") by the Federal Aviation Administration ("FAA"). SWF welcomes the broad scope of the RFI, which recognizes the need to consider the implications of growing space transportation activity on aviation, other users of shared environments, and public safety, and appreciates this opportunity to provide comments.

2. The RFI, issued pursuant to the 2026 National Space Transportation Policy, anticipates substantial growth in FAA-licensed launch and reentry operations, potentially reaching 10,000 per year by 2035. SWF supports efforts to develop a competitive and capable U.S. commercial launch sector through enhanced launch capacity and predictability, and agrees that substantially higher activity levels will require updated approaches to licensing and oversight. We encourage the FAA to ensure that these efforts are accompanied by measures to maintain both aviation and spaceflight safety, minimize disruption to other sectors and users, and strengthen operational coordination as activity scales. SWF's comments focus on Questions 1 (spaceport location criteria), 5 (critical space launch corridors), and 6 (other considerations) of the RFI, which relate to the safety, operational coordination, and the broader impacts of growing space transportation activity.

***[RFI Question 1: Spaceport Location Criteria]*** **Spaceport siting decisions should account for safety, environmental effects, and impacts on other users of shared airspace and maritime areas, including across national borders.**

3. SWF recognizes the importance of strategically located spaceports in supporting growing launch and reentry activity. Beyond geographic and logistical suitability, the evaluation of potential sites should consider their broader implications on public safety, the environment, and other users of shared airspace and maritime areas. These considerations should be incorporated into spaceport siting evaluations as early as practicable.

4. Of particular importance are the potential cross-border implications of launch and reentry operations. Launch trajectories, Aircraft Hazard Areas, and Debris Response Areas may affect the airspace of neighboring States and international aviation and maritime routes. As SWF noted in its comments to the Bureau of Ocean Energy Management (Docket BOEM-2026-0232), the

development of launch infrastructure should respect applicable international legal obligations, including State sovereignty over territorial airspace and the freedoms of navigation and overflight in the exclusive economic zone and high seas, and avoid unjustifiable interference with the exercise of these rights. SWF recommends that the FAA consider these implications when comparing potential sites and launch trajectories, and engage affected States and relevant authorities early in the planning process.

5. Environmental considerations should likewise form part of spaceport site evaluation, including potential effects on coastal and marine ecosystems, protected areas, and surrounding communities. Consistent with SWF's previous comments to the FAA (Docket FAA-2026-8614), these considerations should be addressed through proportionate, risk-based approaches that build on existing environmental assessment processes and consultation mechanisms. Early engagement with affected communities and other stakeholders can help identify potential conflicts and inform siting decisions before substantial investments are made.

***[RFI Question 5: Critical Space Launch Corridors]*** **Critical space launch corridors should support safe and predictable access to airspace while minimizing disruption to other users, through flexible, risk-based airspace management, timely information sharing, and effective domestic and international coordination.**

6. SWF supports efforts to improve the predictability and efficiency of airspace usage for launch operations. The designation of critical space launch corridors could facilitate advance planning and coordination, especially for frequently used launch trajectories. However, given that the scale, pace, and geographic distribution of future launch and reentry demand remain uncertain, it would be preferable to adopt a flexible and adaptable approach to corridor planning and management. Airspace is a finite, shared resource, and access for space transportation should not come at the expense of onerous restrictions on other users. SWF therefore encourages the FAA to consider critical space launch corridors in a way that supports dynamic airspace management, without permanently segregating airspace from other uses.

7. In particular, the designation of a corridor can be distinguished from the activation of restrictions within it. The geographic extent, timing, and duration of restrictions should remain proportionate to the risks of the specific operation, accounting for factors such as demonstrated reliability, vehicle characteristics, trajectory, and contingency requirements. Where practicable, airspace restrictions should be activated only when needed and released as soon as conditions permit — as is the intended practice today. The FAA has made progress in reducing airspace closure through improved operational procedures and tools such as the Space Data Integrator. Critical space launch corridors should build on these developments and allow for improvements in dynamic airspace allocation as operational experience and technical capabilities evolve.

8. Effective information sharing and operational coordination are essential to achieving these objectives. While tracking and prediction capabilities continue to advance, these technologies are only useful to airspace management if the relevant information reaches the appropriate users in a timely and actionable form. SWF recommends that the FAA work with launch operators, air traffic management authorities, relevant data providers, and other affected stakeholders to establish common information requirements and procedures for corridor planning, activation, modification,

and release, including contingency responses. Relevant information should be shared through interoperable systems and in formats that can be readily incorporated into air traffic management processes. With efforts underway to modernize the U.S. air traffic control system, SWF encourages the FAA to ensure that the information and coordination requirements of space transportation are considered in the design and implementation of these systems.

9. The framework for designating and using critical space launch corridors should also be transparent and based on objective criteria. Where operations warrant priority access, the FAA should clearly publish the basis for such prioritization, including how different mission requirements, vehicle characteristics, operational risks, and competing airspace demands will be considered. Clear and predictable procedures would help operators plan their activities while enabling other airspace users to anticipate and manage potential disruptions.

10. International coordination is another important consideration. Differences in air navigation service providers' capabilities and procedures can result in substantially different responses to the same launch hazards. SWF therefore encourages the FAA to engage affected foreign authorities and work through relevant international mechanisms, including the International Civil Aviation Organization (ICAO), to promote compatible information-sharing arrangements, procedures, and contingency responses. These efforts could build on existing ICAO standards and guidance, including but not limited to, Annex 11 (Air Traffic Services) and Annex 15 (Aeronautical Information Services) to the Chicago Convention concerning air traffic coordination, contingency planning, and the quality and exchange of aeronautical information.

11. SWF also encourages the FAA to establish mechanisms for periodically assessing the performance of critical space launch corridors, drawing on operational data and experience. Relevant measures could include corridor utilization, the duration and extent of airspace restrictions, disruptions to other airspace users, and the effectiveness of contingency responses. Lessons learned from operations and incidents should inform improvements to corridor procedures and future airspace management capabilities. This would support a flexible, evidence-based approach that can evolve as launch and reentry activity increases.

***[RFI Question 6: Other Considerations]*** **Strengthen safety oversight, information sharing, and operational coordination across launch, on-orbit operations, and reentry to address gaps as activity scales.**

12. Beyond the specific questions raised in the RFI, SWF encourages the FAA to consider how its broader regulatory and operational framework could evolve to manage a substantially higher volume of launch and reentry activity. In particular, as activity increases, existing gaps in safety oversight, information sharing, and operational coordination across launch, on-orbit operations, and reentry may become more consequential.

13. One such gap concerns collision avoidance in the period between spacecraft separation and their reliable identification and tracking. This can be especially challenging for rideshare missions, where numerous spacecraft operated by different entities may be deployed in close succession, with varying operational capabilities and information-sharing arrangements. Closing this gap requires timely exchange of launch manifests, deployment information, and spacecraft

ephemerides, as well as effective integration of information from different sources. SWF encourages the FAA to work with the Office of Space Commerce, the U.S. Space Force, launch operators, satellite operators, and relevant international partners to strengthen information-sharing arrangements and clarify responsibilities for spaceflight safety following separation, building on existing capabilities and coordination mechanisms. Improved coordination would reduce uncertainties and risks during early-orbit operations, supporting greater launch capacity while protecting newly deployed spacecraft. Such efforts would also reduce the risk of interference with other States' space activities, and contribute to giving practical effect to the principle of due regard under article IX of the Outer Space Treaty.

14. Space object reentry presents another challenge, especially in relation to aviation safety. Existing orbital debris mitigation guidelines address casualty risks to people on the ground, while FAA regulations separately establish aviation risk criteria for licensed reentry operations and controlled disposal of launch vehicle stages. However, managing the risks posed to aircraft by uncontrolled reentries of space transportation vehicles and their components remains challenging, given uncertainties in reentry timing, location, and debris survivability. This also has implications for international liability. Under article II of the Convention on International Liability for Damage Caused by Space Objects, a launching State is liable for damage caused by its space objects to aircraft in flight. SWF thus encourages the FAA to work with relevant agencies and international partners to improve the assessment and management of these risks, including through appropriate analytical tools and procedures for sharing reentry predictions and associated uncertainties with affected airspace authorities.

**Conclusion**

15. The Secure World Foundation supports the FAA's efforts to strengthen U.S. commercial space transportation capabilities and accommodate growing launch and reentry activity. As activity scales, forward-looking planning and coordination will be essential to protect public safety, manage the impacts on other users of shared environments, and ensure that the regulatory and operational frameworks remain effective. Addressing these challenges proactively will support sustainable industry growth and reinforce U.S. leadership in responsible space transportation globally. In this regard, SWF respectfully offers the following recommendations:

a) **Incorporate safety, environmental, and cross-border considerations into spaceport siting decisions**, including impacts on other users of shared airspace and maritime areas and applicable international legal obligations.

b) **Develop a flexible, risk-based framework for critical space launch corridors that supports predictable access while minimizing restrictions on other airspace users,** with transparent prioritization criteria, timely information sharing, effective domestic and international coordination, and periodic review of corridor performance.

c) **Strengthen safety information sharing and coordination across launch, on-orbit operations, and reentry** to address gaps in post-separation collision avoidance and the assessment of aviation risks from reentry, through cooperation with relevant agencies, operators, and international partners.