



March 17, 2025

**VIA EMAIL**

Adrienne Thomas, NOAA PRA Officer  
Email: NOAA.PRA@noaa.gov

**Subject: Request for Comment; Licensing of Private Remote-Sensing Space Systems; OMB Control Number 0648-0174**

Dear Adrienne Thomas:

Thank you for the opportunity to provide input regarding the new, online platform to manage license actions called the Commerce Licensing and Compliance System for Space (“CLCSS”) proposed by NOAA’s Office of Space Commerce (OSC) Commercial Remote Sensing Regulatory Affairs (“CRSRA”). Capella Space Corp. (“Capella”) is a CRSRA licensee and has built a constellation of small satellites that provide Earth observation imagery to governments and industries worldwide using on-demand, very high-resolution (VHR) X-band Synthetic Aperture Radar (SAR). Capella is providing input as a potential non-governmental entity user of CLCSS.

Capella applauds NOAA’s effort to build a self-service licensing system that will automate process workflows for both end users and regulators to replace the current manual and time intensive process used by CRSRA. A system which provides a modern, secure interface between CRSRA licensees and CRSRA, is necessary to protect the proprietary nature of licensing actions as the commercial remote sensing industry rapidly expands. Capella recommends CRSRA periodically review the design, development, and progress of the system with licensees and the commercial remote sensing industry to ensure user input is captured.

The licensing self-service functions in the proposed CLCSS are welcome changes to the application process. Many modifications requested by licensees are non-substantive changes that do not change the overall capability of the licensed systems. Capella proposes that such non-substantive modifications should be automatically approved once submitted through CLCSS. This would significantly reduce the administrative burden to both CRSRA and licensees for non-substantive license updates.

CLCSS cannot be an additional step that transfers the administrative burden from the regulator to the licensee. CLCSS should be designed to reduce the time it would take for a licensee to perform the task manually. If CRSRA envisions all communication will be sent through CLCSS and not through email, it is critical that the system be designed so as not to increase the time and administrative burden for licensees simply to communicate with CRSRA. CLCSS should autosave end user’s inputs in the system and save uploaded attachments in a variety of file formats to promote ease of use for licensees. CLCSS should also provide insight into the status of the review workflow, similar to how ELISA (<https://elisa.dtsa.mil/>) provides insight, which identifies the case officer contact and what federal officers or intergovernmental agencies are reviewing open actions.

Sincerely,

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