



March 17, 2025

By Email to NOAA.PRA@noaa.gov

Adrienne Thomas
NOAA PRA Officer
U.S. Department of Commerce
National Oceanic & Atmospheric Administration
1401 Constitution Avenue NW
Washington, DC 20230

Re: OMB Control Number 0648-0174, Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Licensing of Private Remote Sensing Space Systems

Dear Ms. Thomas:

Planet Labs PBC (Planet) submits the following comments in response to the U.S. Department of Commerce, National Oceanic & Atmospheric Administration (NOAA) Paperwork Reduction Act Notice of Information Collection (PRA Notice) relating to the way that the Office of Space Commerce, Commercial Remote Sensing Regulatory Affairs (CRSRA) collects information from prospective licensees and licensees of private space-based remote sensing systems.¹ Planet strongly supports CRSRA's proposal to move to an online platform for managing licensing actions, which Planet anticipates will streamline interactions between CRSRA and licensees and reduce time spent on paperwork.

Planet is a long time CRSRA licensee and appreciates CRSRA's timely consideration and grant of private commercial remote sensing licenses. The PRA Notice notes that "CRSRA is committed to improving the user experience and providing a simplified license application and management process for all licensees."² Planet writes to support CRSRA's work toward making the licensing and compliance process easier and more streamlined for licensees through the adoption of an online platform to manage license actions. Planet

¹ *Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Licensing of Private Remote Sensing Space Systems*, 90 Fed. Reg. 3800 (Jan. 15, 2025) (PRA Notice).

² *Id.* at 3800.



anticipates that the implementation of the Commerce Licensing and Compliance System for Space (CLCSS) will result in reduced industry time and effort in preparing initial licensing and modification applications, as well as required notices and certifications. We agree with CRSRA's assessment that CLCSS likely will also reduce processing times and minimize unnecessary follow-up correspondence. These efforts to streamline and make government-private sector interactions more seamless should be applauded.

Planet operates in a heavily regulated space and has significant experience navigating online licensing and filing systems. It suggests that CRSRA consider the following best practices as it continues work toward developing and deploying CLCSS:

- (1) ***Avoid overly restrictive fields.*** Online government forms are sometimes very restrictive in what inputs they will accept for particular fields. Forms that are overly restrictive in this way can be difficult for users to properly fill and submit. For example, users are sometimes forced to submit a value that conforms to the form's requirement that actually is not accurate for their particular circumstances in order to advance or submit a form. Where possible, Planet suggests leaving fields open-ended to allow for flexibility and accuracy in responses.
- (2) ***Provide adequate space for comments and supplementary information.*** In Planet's experience, users many times need additional space to submit a short explanation or supplementary information in support of a particular response in a form. Allowing such spaces to explain an answer to a form question, even if not routinely used by applicants, can reduce uncertainties and minimize follow-up correspondence.
- (3) ***Consider in the design how to easily facilitate searches.*** One of the primary benefits of an online filing system for CRSRA and licensees is to have a shared archive of prior submissions by that licensee. To make that archive most useful, past filings by a licensee should be easily searchable by both CRSRA and the licensee by date and keyword(s).
- (4) ***Implement security best practices.*** CRSRA's licensing process is not public and licensees often submit business confidential information in license applications, modification requests, and required notifications. CRSRA's CLCSS should implement security best practices to ensure that the confidential information submitted by licensees is adequately protected.

Planet appreciates this opportunity to comment and looks forward to continuing to work with CRSRA on methods for streamlining and improving the private remote sensing licensing process in the United States.



* * *

Respectfully Submitted,

/s/ Danielle J. Piñeres

Danielle J. Piñeres
Deputy General Counsel & Vice President of
Regulatory Affairs & Policy
Planet Labs PBC

cc: Dr. Sarah Brothers, Director
Commercial Remote Sensing Regulatory Affairs