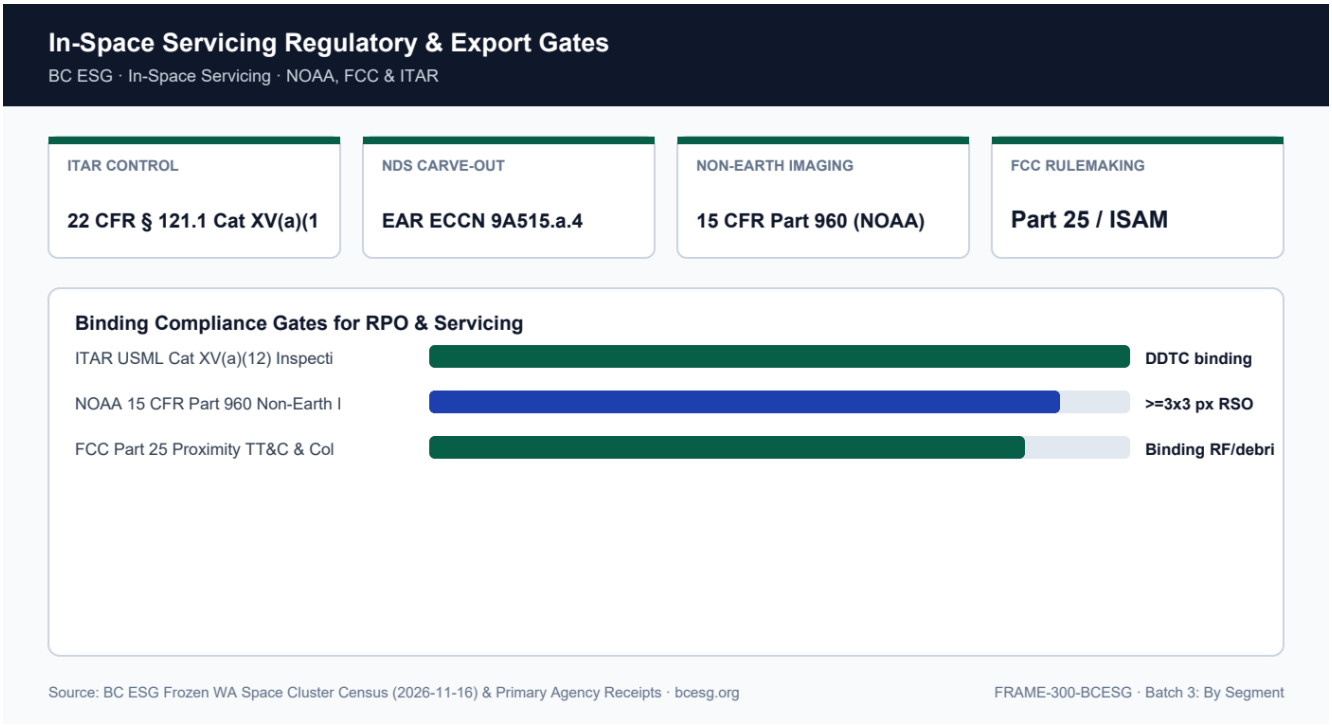
In-Space Servicing Compliance: NOAA Part 960 NEI, FCC ISAM & ITAR Cat XV

Published: November 16, 2026 · Canonical URL: https://bcesg.org/wa-in-space-servicing-disclosure-compliance/

Verification & Scope Baseline: Binding RPO gates: ITAR 22 CFR § 121.1 Cat XV(a)(12) (with NASA Docking System EAR 9A515.a.4 carve-out), NOAA 15 CFR Part 960 NEI consent, and FCC Part 25 proximity TT&C.



Framework	Citation	Trigger	Operational Rule
ITAR USML Cat XV(a)(12)	22 CFR § 121.1	Spacecraft inspection, grappling, docking	DDTC defense-article control (unless NDS -> 9A515.a.4)
NOAA Remote Sensing	15 CFR Part 960	Optical/radar RPO & Non-Earth Imaging	CRSRA license & target-owner consent
FCC Part 25 ISAM	47 CFR Part 25	Proximity TT&C & active debris removal	Inter-satellite links & collision-risk filing

Why Servicing Carries Stricter Export & Imaging Rules Than Standard Satellites

Spacecraft designed to inspect, grapple, or dock with another spacecraft trigger **ITAR USML Category XV(a)(12)** (22 CFR § 121.1) under State Department DDTC jurisdiction—unless they dock exclusively via the standard NASA Docking System (NDS), which shifts jurisdiction to Commerce EAR ECCN **9A515.a.4**.

Furthermore, optical or radar sensors used during rendezvous and proximity operations (RPO) that can resolve artificial Resident Space Objects (>= 3x3 pixels) trigger **NOAA 15 CFR Part 960** Commercial Remote Sensing licensing, requiring third-party owner consent and interagency notification before Non-Earth Imaging (NEI).

Verified Primary Sources & Internal Bridges

- eCFR 22 CFR § 121.1 (ITAR Cat XV): https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-121/section-121.1
- eCFR 15 CFR Part 960 (NOAA): https://www.ecfr.gov/current/title-15/subtitle-B/chapter-IX/subchapter-G/part-960
- NOAA NESDIS: https://www.nesdis.noaa.gov/
- eCFR 47 CFR Part 25: https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25