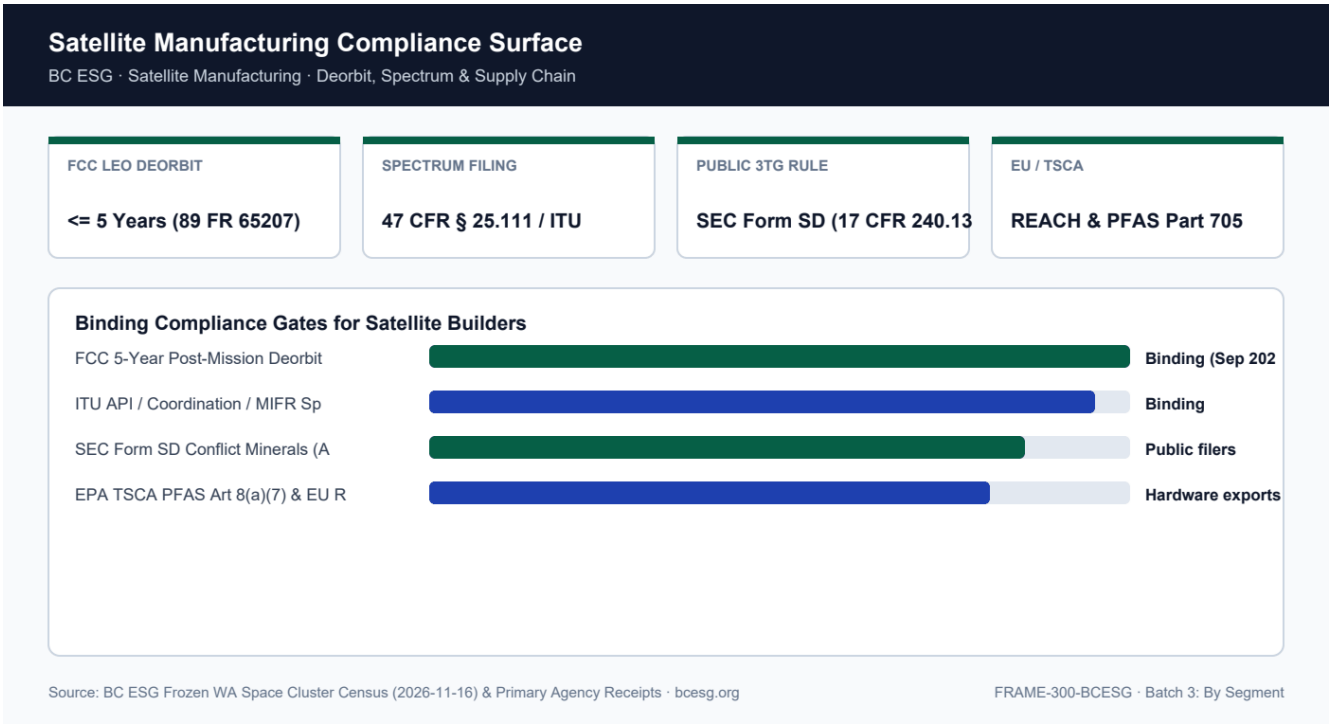
Satellite Manufacturing Compliance: 5-Year Deorbit, ITU & Conflict Minerals

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Verification & Scope Baseline: Binding FCC 5-year LEO deorbit rule (effective Sep 9, 2024; 89 FR 65207), ITU Art 9/11 filings, and SEC Form SD (17 CFR § 240.13p-1) for public primes.



Mandate	Citation	Who It Binds	Operational Impact
5-Year LEO Deorbit	47 CFR §§ 25.114, 25.283 (89 FR 65207)	All US-licensed LEO constellations	Propellant margin, drag devices, reliability
ITU Spectrum Coordination	47 CFR § 25.111 / ITU Radio Regs	Satellite operators	API -> CR -> MIFR filing & cost recovery
Conflict Minerals (3TG)	17 CFR § 240.13p-1 (Form SD)	Public filers (AMZN, BA, BKSY, CACI)	Annual May 31 OECD due diligence
TSCA PFAS & EU REACH	40 CFR Part 705 / EC 1907/2006	Importers & EU-integrated hardware	PTFE wire, lubricants, SVHC tracking

Orbital Debris & Spectrum Licensing (47 CFR Part 25)

Under **47 CFR §§ 25.114 and 25.283** (effective **September 9, 2024**, **89 FR 65207**), U.S.-licensed NGSO constellations and foreign operators seeking U.S. market access must complete post-mission disposal for LEO satellites at or below 2,000 km **within 5 years**—replacing the legacy 25-year NASA guideline.

Simultaneously, **47 CFR § 25.111** requires U.S. satellite operators to submit technical spectrum filings through the FCC to the **ITU Radiocommunication Bureau** (Advance Publication Information, Coordination Request, and MIFR Notification), carrying mandatory ITU cost-recovery obligations.

Verified Primary Sources & Internal Bridges

• Federal Register 89 FR 65207 (5-Year Deorbit): https://www.federalregister.gov/documents/2024/08/09/2024-17726/space-innovation-mitigation-of-orbital-debris-in-the-new-space-age

• eCFR 47 CFR Part 25: https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25

• eCFR 17 CFR § 240.13p-1 (Form SD): https://www.ecfr.gov/current/title-17/chapter-II/part-240/section-240.13p-1

• eCFR 40 CFR Part 705 (PFAS): https://www.ecfr.gov/current/title-40/chapter-I/subchapter-R/part-705