NOAA 15 CFR Part 960 Remote-Sensing Licensing & FCC Debris Plan Handoff

Pillar: Disposal Regime | **Basis:** Federal Regulation (15 CFR Part 960) | **Primary Source:** NOAA CRSRA / Dept. of Commerce | **As Of:** Active Nov 2026 (Streamlined FCC Reliance)

NOAA's 15 CFR Part 960 governs private Earth-observation satellites like Tukwila-based BlackSky; to avoid duplicate technical reviews, NOAA relies on FCC (or other authorized agency) orbital debris oversight while retaining general license conditions.

Documented Instrument & Engineering Record

• What NOAA licenses: 15 CFR Part 960 regulates private space-based remote-sensing systems—focusing on imaging capabilities, shutter control, and national-security data tiers.

• Eliminating duplicate debris reviews: Because commercial remote-sensing satellites also require FCC spectrum licenses, NOAA streamlined Part 960 to rely on FCC (or equivalent U.S. agency) orbital debris plan reviews rather than running a parallel technical ODMP assessment.

• Retained statutory backstop: NOAA still includes standard post-mission disposal compliance conditions in Part 960 licenses, so an FCC violation or unapproved orbit change can trigger multi-agency scrutiny.

• WA applicability: Directly governs BlackSky's Tukwila-operated optical imaging constellation and any WA Earth-observation payloads.

15 CFR Part 960 vs. 47 CFR Part 25 Compliance Mapping

Compliance Area	NOAA Part 960 Role	FCC Part 25 Role
5-Year LEO Deorbit	Defers technical review to FCC	Primary technical & enforcement lead
Imaging / Shutter Control	Primary regulator (Tier 1–3)	Not regulated
RF Downlink Spectrum	Not regulated	Primary regulator
License Condition Link	Requires lawful disposal compliance	Enforces ODMP & § 25.283(e)

Mission Designer, Compliance Lead & Founder Takeaways

• EO startups cannot skip FCC orbital debris disclosures by citing a NOAA remote-sensing license—NOAA expects the FCC ODMP to carry the technical proof.

• Changes to operational altitude or constellation replenishment schedules require coordinated updates across both FCC and NOAA filings.

• Compliance leads should maintain one unified configuration-controlled Orbital Debris & End-of-Mission dossier for both agencies.

Cross-Cluster Links & Primary Sources

• **BlackSky (Tukwila) Census Profile:** https://bcesg.org/blacksky-washington-space-cluster-profile/

• **FCC 5-Year Disposal Rule Mechanics:** https://bcesg.org/wa-space-orbital-fcc-5-year-rule-mechanics/

• **WA Space Cluster Hub:** https://bcesg.org/washington-space-cluster-census/

• **eCFR: 15 CFR Part 960 (Private Remote Sensing Space Systems):**
https://www.ecfr.gov/current/title-15/subtitle-B/chapter-IX/subchapter-D/part-960

• **NOAA CRSRA: Commercial Remote Sensing Regulatory Affairs:**
https://space.commerce.gov/regulations/commercial-remote-sensing-regulatory-affairs/

• **eCFR: 47 CFR § 25.283:** https://www.ecfr.gov/current/title-47/chapter-I/subchapter-B/part-25/subpart-D/section-25.283

Provenance Note: Verified against 15 CFR Part 960 (eCFR) and NOAA CRSRA guidance as of 2026-11-16.