Program Manager Desk Brief: Launch, Orbital & Prime Delivery Gates Across WA Space

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Role: Program Manager | **Top Live Mandate:** FAA Part 450, NEPA, FCC 5-Yr Deorbit, NASA ODAR & NFS Clauses | **Dead Rule to Ignore:** FAR Case 2021-015 & Federal Scope 3 Contract Deliverables | **Next Deadline:** Mar 9, 2026 (Part 450 Cutoff Passed) / Continuous Launch & CDR Gates

Desk Summary: The Program Manager at a 20–500-person WA space firm owns schedule-critical regulatory deliverables: FAA Part 450 launch licensing, NEPA environmental review, FCC 5-year LEO deorbit plans, NASA ODARs, and NFS/FAR 52.219-9 contract gates.



Gate / Rule	Status	Effective / Cutoff Date	Instrument
FAA Part 450 Launch Licensing	LIVE	Mar 9, 2026 mandatory cutoff	14 CFR Part 450 (85 FR 79566)
FCC 5-Year LEO Deorbit	LIVE	Sep 9, 2024 eff. / Sep 29, 2024 compliance	47 CFR § 25.283(e) (89 FR 65217)
NASA ODAR (<1:10,000 Casualty)	LIVE	Active contract deliverable baseline	NPR 8715.6B / STD-8719.14C
NEPA Launch Review	LIVE	Active (2026 streamlining proposals pending)	42 U.S.C. § 4321 / FAA Order 1050.1F
FAR Case 2021-015 / OMB M-22-18	DEAD	Withdrawn Jan 2025 / Rescinded Jan 2026	90 FR 2663 / OMB M-26-05

1. What Arrives on This Desk (Live Asks & Rules)

Across Launch, Satellite Manufacturing, In-Space Servicing, and Ground Systems & SATCOM, Program Managers track the technical-regulatory deliverables that gate launch, spectrum, and prime milestone payments.

Six live items land directly on the PM desk: FAA Part 450 launch licensing (mandatory since Mar 9, 2026), NEPA environmental review, FCC 5-year LEO disposal (plus EPD flow-downs), NASA ODAR orbital debris deliverables, NASA FAR

Supplement (NFS) clauses, FAR 52.219-9 small-business subcontracting, and Radiation/SEE test reports.

2. What Is Dead or Enjoined and Can Be Ignored

Do not build CDRLs or milestone checklists around withdrawn FAR Case 2021-015 GHG disclosures or OMB M-22-18 blanket software attestations.

3. What Carries a Date (Deadlines & Instruments)

Key launch, orbital, and contract-delivery dates:

Corpus References & Cross-Role Links

- Program Duty: FAA Part 450, NEPA, FCC & ODAR: https://bcesg.org/wa-space-role-program-faa-nepa-fcc-odar/
- Program Duty: NFS, Subcontracting & Schedule: https://bcesg.org/wa-space-role-program-nfs-subcontracting-schedule/
- FAA Part 450 Launch Licensing (LIVE): https://bcesg.org/wa-space-rule-faa-part-450-launch-live/
- FCC 5-Year Deorbit Rule (LIVE): https://bcesg.org/wa-space-rule-fcc-5-year-deorbit-live/
- NASA ODAR Orbital Debris (LIVE): https://bcesg.org/wa-space-rule-nasa-odar-orbital-debris-live/