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U.S. Department of State Office of Outer Space Affairs
SSA Discussion Group

Thank you to Ryan Guglietta and the Outer Space Affairs team in coordinating the SSA Discussion Group for private entities to provide input and feedback on the central questions faced by the SSA Expert Discussion Group of UNCOPUOS.

We the Space Debris Foundation submit this statement in support of the establishment of new SSA standards that can be unified on the international level. The exchange of data between Member States of the United Nations is integral to promoting awareness of the location and trajectory of objects in orbit. With the Department of Commerce TraCCS system beginning its pilot with 17 operators, contributions from additional operators and coordination between U.S. executive agencies and international partners is crucial to having TraCCS meet its desired goals with the hope of incorporating this into an international dataset.

The effective exchange of data domestically and internationally will preserve the safety and integrity of U.S. infrastructure and critical assets in space. By having this data available to fellow U.S. executive agencies, private operators, established State partners, and nascent spacefaring actors, it will protect the orbital environment from Kessler Syndrome, a catastrophic chain reaction of debris collisions.

There are also a lot of shortcomings when it comes to technical SSA capabilities, which can include communication delays between the ground station and the satellite and the lack of coverage based on satellite size. Investing in SSA technologies, and collaborating with international partners to do so, will be critical in addressing the space debris problem. There is

already a significant amount of objects in orbit that are much too small to track, with many proving difficult to determine their provenance. Space objects remain under the permanent ownership of the launching State. Consent is required for the removal or repurposing of a space object if such object is registered to another party. Consultation is required by international law if engaging in a mission in orbit that affects other operators. Therefore, the United States cannot do this alone. The United States in building up the data repository needs to work with international partners to build up the capacity to monitor space objects, where there is a large gap of smaller objects (<1cm) that goes unmonitored. This lack of awareness is frightening to operators, State actors, and advocates of space debris mitigation.

In coordinating operationally, the U.S. Department of State in conjunction with the Department of Commerce should aim to identify objects under the control of the United States that could be leveraged for recycling, in addition to objects that pose substantial risk to other nearby objects. The establishment of an international list, whereby such data could be submitted would enable spacefaring actors to be aware of which materials can be reused when ADR operations are pursued. In the SSA Expert Discussion Group, it was proposed that the UN OOSA establish a unique ID for each space object to the extent of supervising changes with such objects, provided confirmation from the State, including (1) a Point-of-Contact, (2) satellite attributes, and (3) ephemerides and planned maneuvers.

In regard to the Point-of-Contact proposal, we would agree with the idea that there should be two or more POCs for the purpose of 24/7 accessibility, whether such relevant information is shared by the operator, the administrators of the data repository, or via publication. We recognize the security concerns of sharing certain information, meaning that criteria should be established through agreement to determine the extent of information that should be shared upon request or upon initiative. We also would agree with the distinguished private sector delegate of the United States, who indicated a phased approach, starting with sharing simple information and building up to compliance in providing more complex data. There

should be the inclusion of satellite attributes, ephemerides and planning maneuvers that is accessible amongst all Member States and operators to ensure the safe and sustainable navigation and use of the orbital environment. However, States have expressed concern on how to effectively exchange information, given the ambiguity in the Long-Term Sustainability (LTS) Guidelines. Many states utilize different methods to submit contact information, in which there is a divergence in State practice. The use of the Expert Group to determine a unified method of information is one of the most important tasks of the Expert Group. Another question is the frequency and scope of information sharing, and whether such information will be used for timely collision avoidance or for less timely planning purposes, such as pre-launch preparations. The sharing of information should align with the principles outlined in the LTS guidelines, and ensure that operators have enough information to consistently avoid harmful interference with other States, and thereby its operators.

We must treat this as a problem for all humanity, as the future of the use of outer space is at risk.

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