Testimony of Shiva Goel
Partner, Wiley Rein LLP

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SAT Streamlining Act: Modernizing Satellite Licensing for the Final Frontier
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Chairman Guthrie, Ranking Member Pallone, Chairman Hudson, Ranking Member Matsui, and distinguished members of the Subcommittee, thank you for the opportunity to share my perspectives on the effort to modernize licensing for commercial space services. I had the honor of leading spectrum and space policy initiatives at the National Telecommunications and Information Administration (NTIA) and advising on satellite, international, and wireless matters at the Federal Communications Commission (FCC). I also have had the privilege of representing space companies, both large and small, established and emerging, in private practice—and helping them clear a path to launch their systems has been a joy of my career. As a non-resident fellow for the Center for Strategic and International Studies (CSIS), I often dwell on the many ways that telecommunications and space regulations intersect with our national security. Today, I am testifying on my own behalf based on these experiences, and not on behalf of my firm or any of my clients.

I have been following the federal government's effort to streamline commercial space licensing for years, and with great interest. What started as a "good government" effort to unlock innovation and connect the unconnected has now evolved into a strategic imperative that is nothing short of vital to our Nation's success. Recent developments suggest that the golden era of commercial space we thought had just started may be poised for yet another revival. Satellite services are growing more capable—just look at how rapidly direct-to-device has advanced beyond the emergency text. Complex servicing and manufacturing missions once dismissed as conceptual are now funded programs with successful flights under their belts. Demand for imagery and sensing also has surged while revisit times have fallen, and advancements in optical communications have started to unlock new system architectures. More structurally, launch capacity is now expanding after years of shortfalls and constraints. The investor base willing to support and finance this growth is also expanding, with greater participation from strategics, public markets, private funds, and U.S. defense programs, and greater willingness to write even bigger checks.

But this growth, and this revival, is not guaranteed. It requires us to move as fast as the innovators we oversee. And at the rate they are moving, failing to keep up will create more than just a regulatory "bottleneck." It will impose a structural constraint on American competitiveness and our national security leadership given the potential that lies ahead.

The FCC's leadership in solving this challenging problem has been essential and in my view extraordinary, as has this Committee's steadfast focus on a legislative solution. Regulatory reform and legislation serve complementary purposes: the FCC can enhance rules to target specifics and address root causes, while Congress can set durable expectations, establish accountability, and bridge any gaps in authority, whether real or perceived. Together, both can meaningfully accelerate the process.

Looking ahead, I believe there are three critical factors that should guide our approach.

The Hidden Costs of Regulatory Delay

First, we should recognize that long licensing timelines cost us much more than we think.

We tend to measure the cost of regulatory delay in terms of extra capital burn, fees and payroll, and maybe even a missed launch window. As intolerable as those costs may be, they pale in comparison to the ones we never see: the breakthroughs never attempted, the companies never formed, and the architectures never designed because regulatory risks and timelines prevented the economics from penciling in.

To illustrate just one way that these losses occur, place yourself in the shoes of a small satellite company. Assume that you just raised an initial round of funding and have 30 months before your next milestone – and you absolutely need a license before then. Roughly speaking, you allocate part of that 30 months to system design and part of it to licensing, because you need to know what you are applying for before you file a license application. Now assume that your lawyers tell you that the licensing timeline could consume 24 out of that 30 months. That would leave you with just 6 months to architect your new system.

What if the licensing process took 12 months instead of 24? That would leave you with 18 months, rather than 6 months, to design your system – which means you now have *triple* the time to innovate during this critical period of early development. What if the FCC also made it easier to modify your system after you receive your license? That would reduce pressure to rush to a design freeze and give you the freedom to iterate in response to technology and demand.

There are many other ways that licensing timelines can result in a regulatory squeeze. But just from this one thought experiment, it is reasonable to believe that regulatory delays reduce our innovation capacity by as much as 66% in some cases, while also discouraging the type of constant improvement that makes the best space innovators so successful. In other words, the real problem with an inefficient regulatory process is not that it delays the future from occurring, but that it erases commercialized ideas from the future altogether.

With global rivals fast on our heels, now is not the time to leave good ideas on the table. The People's Republic of China (PRC) has prioritized space as a domain of strategic competition, and its military-civil fusion doctrine could accelerate its ability to integrate commercial space into national security capabilities. China is already attempting to scale its own LEO broadband

constellation, already operates a widely used competitor to GPS, and continues to develop space-based intelligence and sensing networks. It also has been filing aggressively at the International Telecommunication Union (ITU) to secure orbital and spectrum rights generally assigned on a first-come, first-served basis. And we all know that these companies are not waiting years for a regulatory license.

Faster, But Not a Rubber Stamp

Second, speed without scrutiny is not real reform, and licensing efficiency should not be confused with a rubber stamp. In a shared resource environment, these distinctions matter tremendously—and success depends not just on compressing the timeline but reaching the right outcomes in the end.

In this context, applications that raise challenging physical and spectrum coordination implications deserve careful technical review. Not because we want to slow innovation, but because we know it will only occur if companies invest in an environment that they can trust.

Effective Federal Coordination Is Vital

Finally, efficient and effective NTIA coordination is no longer an interagency formality—it is a necessary component of any modern licensing framework for commercial space services. S-band and X-band frequencies, critical for earth observation startups, launch, and small satellite operators alike, are heavily used by federal agencies for weather, defense, and national security purposes. Ku- and Ka-band broadband constellations also increasingly seek sharing arrangements with federal systems. As Q- and V-band and even higher frequencies emerge as the next frontier, the same dynamic is sure to follow. This is to say nothing about the coordination frequently required in spectrum suitable for direct-to-device.

Separately, the U.S. government continues to transition from owning and operating its own space assets to contracting for commercial services that provide the same capabilities. As a result of that effort, the line between "federal" and "non-federal" spectrum use will continue to blur—and more commercial licensees could seek authority to operate in federally-allocated bands in support of combined commercial and government missions.

Providing greater opportunity for efficient sharing, and greater predictability in the coordination process, will be critical, as will ensuring that essential federal missions continue uncompromised. This is hard work that demands serious engineering and policy effort from NTIA, the FCC, and spectrum management officials at agencies across the federal government. To meet the growing needs of commercial industry, they need our support.

Thank you again for allowing me to share my thoughts with you this afternoon. I look forward to your questions.