



February 27, 2023

Mr. John Dyer  
Office of Space Commerce, National Oceanic and Atmospheric Administration  
U.S. Department of Commerce

Transmitted via email to [space.commerce@noaa.gov](mailto:space.commerce@noaa.gov)

Subject: NorthStar Response to RFI on Scope of Civil Space Situational Awareness Services [FR Doc. 2023-01556]

Reference: NorthStar Response to Request for Information [FR Doc. 2022-14516]

Dear Mr. Dyer,

Thank you for the opportunity to respond to this request for information on the scope of civil space situational awareness services (SSA) and the 8 August 2022 request for information regarding space SSA and basic spaceflight safety services for operators.

We are pleased to note that NorthStar was awarded a contract to perform in the Department of Commerce (DoC) Space Traffic Coordination Pilot project in December of 2022. We also responded to the very first DoC RFI in 2019, the RFI of 8 August 2022, and have been an active participant in the Sprint Advanced Concept Training Exercises – Civil Commercial since 2019.

NorthStar intends to deploy in mid-2023 the first four (4) of 24 planned “always on” electro optical satellites that will operate from low Earth orbit (LEO), look out into space, and collect images in all orbit regimes simultaneously (LEO, MEO, HEO, GEO and beyond). The company has raised more than \$100 million and spent years developing sophisticated and proprietary products and services to enhance space situational awareness and safety of spaceflight for government and commercial customers.

NorthStar’s business model is to provide a sophisticated and proprietary suite of basic and advanced space-based space situational awareness (SSA) products and services in a highly cost effective “as-a-service” business model. We have also invested heavily in processing, calibrating, and fusing third-party information from a host of publicly available and other proprietary commercial sources through private business agreements to enhance our SSA product and services offerings.



We are currently engaged with multiple U.S. and allied civil, military and intelligence government entities and commercial customers to include owner/operators, insurance companies, and other space sustainability stakeholders around the world. In sum, NorthStar presents this response from the perspective of an owner/operator, data, product, and value-added SSA information services provider.

NorthStar maintains in this response its prior position that the DoC should transition the existing Department of Defense "basic" space situational awareness services "as is" as its first step. While DoC has indicated a need to improve upon the basic service, based on inputs from commercial space operators, we are concerned that many of the different services described in the current RFI are already available from industry. This requires very careful scrutiny. We strongly assert that any DoC proposal to acquire and deliver many of these services into the basic service, and therefore be released free of charge to a global customer base, will put the Department in the position of competing with industry. It also creates risks to the competitive economics among the firms currently operating in this space and therefore potentially increases costs to the US taxpayer. NorthStar welcomes the opportunity to further engage the DoC on this urgent and timely topic.

Best regards,

A handwritten signature in black ink that reads "Denny Brisley". The signature is fluid and cursive, with "Denny" on top and "Brisley" below it.

Denny Brisley  
President & Chief Operating Officer  
NorthStar Earth & Space Systems, Inc.