

Space Bureau Announces Milestone and Surety Bond Transition Procedures

October 27, 2026

On October 7, 2026, the Federal Communication Commission's Space Bureau announced transition procedures for space station licensees and market access grantees ahead of the effective date of its recently adopted Part 100 rules, which modify space station surety bond and milestone requirements. Formal adoption of the new rules still requires Federal Register publication and implementation of relevant software changes to handle the revised rules. The Space Bureau will announce the effective date of the new Part 100 rules in a forthcoming public notice.

Before the effective date, current licensees and market access grantees that would not be subject to bond requirements under the new rules – GSO (Geostationary/ Geosynchronous Orbit) systems and NGSO (Non-Geostationary Satellite Orbit) systems not authorized under a processing round – may request to be relieved immediately (upon approval) of the current bond requirements by filing a letter request in the International Communications Filing System (ICFS). Additionally, such licensees and grantees may seek to replace the current milestone deadlines with the more lenient deadlines established in the new Part 100 rules.

Current licensees and market access grantees that were authorized under a processing round (and thus still subject to bond requirements under the new rules) may elect to replace their current bond with a new surety bond sized under the new deescalating bond formula, which would take effect on the effective date of the new rules. Such licensees and market access grantees must notify the Space Bureau of their election within one year of the effective date, or the relevant surety bond requirements would remain in force for the rest of the system's license term. Licensees and market access grantees subject to processing rounds do not have applicable new milestone deadlines.

The Space Bureau will review and approve requests on a rolling basis. To be eligible for either of the above options, a licensee or grantee must meet all of the following:

1. Be in compliance with all current milestone and surety bond terms.
2. Not have a pending request for a milestone waiver.
3. Not have received a waiver of the milestone rules.

The public notice recommends that filing parties provide a courtesy copy to Brandon Padgett, acting associate division chief of the Satellite Programs and Policy Division at the Space Bureau, with any filing.

Current applicants may include the certifications described above as part of a pending application, or as a supplement to an already-filed application, to support a waiver request of the bond and/or milestone obligation in the event the pending application is granted prior to the effective date. All applications authorized after the effective date will be automatically subject to the Part 100 milestone and bond rules.

If you are interested in learning more about the new Part 100 rules and transition requirements, please reach out to the Cooley team.

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