

August 14, 2025

Office of Space Commerce
Herbert C. Hoover Building, Room 68015
1401 Constitution Ave. Northwest
Washington, District of Columbia 20230

U.S. Department of State
Office of Space Affairs
2201 C Street Northwest
Washington, District of Columbia 20520

RE: Views of ACT | The App Association regarding the European Union's Space Act and "Vision for a European Space Economy"

ACT | The App Association appreciates the opportunity to provide comments to the National Oceanic and Atmospheric Administration (NOAA) Office of Space Commerce and the Department of State Office of Space Affairs on the European Union's (EU's) Space Act and accompanying *Vision for a European Space Economy*.¹

ACT | The App Association (the App Association) represents small business software application development companies and technology firms that create internet of things (IoT) connected devices, software apps used on mobile devices, and enterprise systems around the globe. These companies drive a global app economy worth more than \$6.3 trillion that employs 1.6 million Americans.² The dynamic app ecosystem continues to produce innovative and efficient solutions that leverage mobile technologies to support American small business growth and job creation. We offer our community's views on the EU Space Act because access to robust wireless broadband allows our small business member to grow, create, and continue contributing to their local economies and communities.

The App Association supports the EU's goals to advance space innovation and to propel the role of space-based services. However, we have concern that certain policies within the Act could inadvertently limit competition and restrict the build-out of broadband connectivity, particularly impacting small business developers and app innovators that rely on connectivity to both develop new innovations and to connect with consumer and enterprise end users in areas where terrestrial connectivity networks either inadequately support connectivity or entirely cannot reach.

¹ OSC Seeks Stakeholder Feedback on the EU Space Act, Office of Space Commerce, <https://space.commerce.gov/osc-seeks-stakeholder-feedback-on-the-eu-space-act/> (last visited Aug. 7, 2025).

² *About the App Economy*, App Association, <https://actonline.org/wp-content/uploads/About-the-App-Economy.pdf> (last visited Aug. 7, 2025).

The Act imposes restrictive operational and authorizing conditions that primarily affect American companies. By limiting the ability of American companies to operate efficiently in space markets, the EU Space Act positions companies that are EU-based, as well as those from other areas such as China, to seize these opportunities.

An optimal EU space regulation will fairly apply objective measures and goals, aligned with global standards and best practices (e.g., International Standards Organization standards and guidelines from the Inter-Agency Space Debris Coordination Committee) as well as U.S. regulations, in a way that permits all space operators, no matter where they are based, to compete. As a result, better satellite-based broadband connectivity options will be available to App Association members and the customers they serve.

Space-based internet access remains an emerging, rapidly evolving technology. We believe the EU should avoid regulating too much, too soon. The industry has shown it will proactively address challenges, without regulatory pressure. Premature rules risk shifting focus from innovation to compliance, ultimately slowing progress.

We therefore recommend, and urge both NOAA and the Department of State to encourage, that:

- The EU introduce space regulatory requirements in alignment with international standards and best practices as well as U.S. regulations, and that such requirements be applied fairly and objectively to those in scope of the Space Act, and that the U.S. government work with the EU to accomplish the same;
- The EU ensure that its Space Act regulations do not create unnecessary barriers to competition and innovation in the space markets they regulate;
- Both in and outside of the context of the Space Act, the EU employ technology-neutral regulation that incentivizes the deployment of broadband solutions leveraging spectrum assets efficiently; and
- The EU carefully weigh the need and impact of regulation to avoid fostering a culture of compliance over innovation in a rapidly evolving field.

In conclusion, the App Association believes that the EU should recalibrate its approach to space regulation to prevent unintended consequences that limit connectivity and competition. In taking a revised approach to space markets that provides a fair opportunity to compete, particularly in the context of satellite broadband connectivity, the EU can better support small business developers and broadband expansion, driving digital inclusion and a vibrant tech ecosystem across Europe.

Sincerely,



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