



Space Law, Regulation and Policy Update

Good Afternoon!

Despite the Thanksgiving holiday, it's been a busy couple of weeks in space. As we head into 2025's homestretch, all Speaker Johnson wants for Christmas is final NDAA language, several members want NDAA language to put investment in Chinese aerospace on the naughty list, Jared Isaacman (who earlier this year seemed destined to receive a lump of coal) has been renominated for the NASA Administrator role, and President Trump this week published his national security wish list.

Beyond Washington, the European Space Agency (ESA) members committed to increased space spending and the China National Space Administration published a 22-measures plan designed to integrate commercial space into its national strategy, signaling plans to build a coordinated, state-backed commercial ecosystem by 2027.

All that and more in this edition of Akin's Space Law, Regulation and Policy Update.

***One more thing:** Next week will be a big week for space conferences in Washington, D.C. If you're attending the International Institute of Space Law (IISL) Galloway Symposium (hosted at Akin's D.C. office and free to attend - [register here](#)) or Americas Space Forum, please stop us and say hi. We will attend both conferences.*

Akin Spotlight

Akin's [Trump Executive Order Tracker](#) provides a high-level overview of executive orders published by the new administration. These orders cut across dozens of industries and topics. The Tracker is updated as orders and Akin's in-depth analysis of specific orders are published.

Please visit Akin's [Trump Executive Order Overview](#) to view a matrix of the orders.

On The Hill

Articles and Quotes

Isaacman Returns to Senate for Second Confirmation Hearing (*AP News*)

Jared Isaacman, a billionaire entrepreneur and private astronaut, returned to the Senate this week for a rare second confirmation hearing before the Commerce Committee as President Trump's nominee to lead NASA. Originally pulled from consideration in May following Trump's fallout with Elon Musk, Isaacman was renominated in November and is now urging swift Senate action to fill the agency's top role before the Artemis II crewed lunar flyby launches in early 2026. Senators across party lines emphasized the need for stable leadership at NASA amid rising competition with China. Isaacman used the hearing to underscore that delay could jeopardize U.S. leadership in space, while reiterating his support for Congressionally authorized Artemis missions. Senate Republicans signaled they aim to confirm Isaacman by year's end.

Final NDAA Bill Text Delayed (*Association of Defense Communities*)

The final text of the NDAA remains delayed as House and Senate negotiators continue to resolve lingering policy disputes unrelated to core defense priorities, including a controversial provision on fertility coverage under TRICARE. Speaker Mike Johnson is reportedly working to remove that language, which would have mandated in vitro fertilization (IVF) access for all active-duty service members. Broader disagreements have also held up release of the bill text, which was initially expected this week. Lawmakers now anticipate unveiling the compromise legislation over the weekend, setting up a compressed timeline for passage before Congress adjourns for the holidays.

House Subcommittee on Space & Aeronautics Holds Hearing on China's Space Rise and Risks to U.S. Leadership (*House Committee on Science, Space, and Technology*)

On December 4, the House Science, Space, and Technology Subcommittee on Space and Aeronautics convened a hearing titled "Assessing China's Space Rise and the Risks to U.S. Leadership." The hearing focused on evaluating the strategic, technological and policy implications of China's accelerating space ambitions and the potential risks they pose to continued U.S. leadership in space. According to the committee, members planned to examine China's centralized space strategy, military-civil fusion and growing international partnerships, alongside efforts to modernize its space architecture across civil, commercial and defense domains. The hearing also intended to explore how the United States can maintain a competitive edge through enhanced partnerships with allies, support for innovation and a unified national space strategy.

Introduced Legislation & Legislative Updates

Sen. John Cornyn (R-TX) **introduced** the Space RACE Act (**S. 3198**) which establishes the National Institute for Space Research.

Please find our Space Legislation Tracker [here](#).

Recent and Upcoming Congressional Hearings

(November 17, 2025 - December 12, 2025)

On November 19, the Senate Select Committee on Intelligence (SSCI) held a closed [briefing](#) on intelligence matters.

On December 2, SSCI held a closed [briefing](#) on intelligence matters.

On December 2, the Senate Committee on Armed Services (SASC) held a closed [briefing](#) on naval aviation mishaps.

On December 3, the Senate Committee on Commerce, Science & Transportation (CST) held a [hearing](#) to consider nominations for Jared Isaacman to be Administrator of NASA and Steven Haines to be an Assistant Secretary of Commerce for Industry and Analysis.

On December 3, SSCI held a closed [briefing](#) on intelligence matters.

On December 4, the House Science, Space, and Technology (SST) Subcommittee on Space and Aeronautics held a [hearing](#) titled “Strategic Trajectories: Assessing China’s Space Rise and the Risks to U.S. Leadership.”

On December 8, Senate CST will hold an [executive session](#) to consider nominations.

In the White House/Executive Branch

Articles and Quotes

[Space Force Plans Surveillance Sats to Complement RG-XX Reconnaissance Fleet](#) (*Air & Space Forces Magazine*)

The Space Force’s new surveillance satellite program reflects a significant shift in executive branch priorities around space-based domain awareness and threat monitoring. Building on its earlier Geosynchronous Situational Awareness Program (GSSAP), the Department of the Air Force (which oversees the Space Force) is now bifurcating its approach: reconnaissance satellites under the RG-XX fleet will provide close-up inspection of high-priority threats, while a new surveillance constellation will autonomously scan the geostationary orbit (GEO) belt for unknown or emerging objects. This dual-track strategy underscores the executive branch’s growing emphasis on

persistent, layered space sensing capabilities and rapid acquisition cycles, particularly in response to Russian and Chinese counterspace developments. The inclusion of low-cost, rapidly producible satellites and potential refueling capability for RG-XX highlights the Department of Defense's (DoD) intent to extend satellite lifespans and reduce replenishment cycles, aligning with broader executive efforts to streamline defense procurement and accelerate tech fielding through programs like the Commercial Space Office and SpaceWERX. Although program size and timing remain uncertain, senior Space Force leaders have signaled urgency and scale as top concerns, with acquisition timelines tied closely to appropriations levels, an implicit call to Congress from the executive branch for funding support.

USSF Awards Initial 'Golden Dome' Prototype Contracts, Signaling Strategic Shift to Space-Based Defense (*SatNews*)

The U.S. Space Force awarded initial prototype contracts under the "Golden Dome" initiative, marking a significant shift toward space-based missile defense. The program aims to create a global, persistent shield capable of intercepting missiles in the boost phase using proliferated constellations of space-based interceptors and fire-control systems. The awarded contracts support development of competing interceptor prototypes and signal the DoD's commitment to rapid acquisition strategies that blend traditional and non-traditional industry players. This approach emphasizes commercial innovation and risk-sharing, with small upfront "prize" awards for ground demonstrations and the potential for multibillion-dollar production contracts in future years. The broader architecture is designed to counter threats from advanced missile systems, particularly from China and Russia, and would integrate with existing sensor and tracking layers. Though the initial investments are small, cost projections for full deployment vary widely, and the initiative reflects a broader strategic pivot in U.S. defense posture toward space-based deterrence.

Trump Reveals What He Wants For the World (*Politico*)

President Donald Trump intends for the U.S. to keep a bigger military presence in the Western Hemisphere going forward to battle migration, drugs and the rise of adversarial powers in the region, according to his new National Security Strategy (released December 4). The 33-page document is a rare formal explanation of Trump's foreign policy worldview by his administration. Such strategies, which presidents typically release once each term, can help shape how parts of the U.S. government allocate budgets and set policy priorities.

Akin note: Space rarely makes an appearance in the National Security Strategy, with the space domain receiving a mention in a paragraph about increasing investment in cutting-edge military and dual-use technology for domains in which the nation is dominant, one mention of the Golden Dome project, and a mention of the need to retool the defense industrial base to produce low-cost missiles and drones quickly.

Office of Space Commerce Holds Stakeholder Briefing on "Mission Authorization" (*U.S. Department of Commerce*)

On December 3, the U.S. Department of Commerce's Office of Space Commerce held a virtual stakeholder briefing to discuss concepts for a new regulatory framework for "novel" commercial space activities. This session marked the first in a series of engagements on "mission authorization," as directed under Section 5 of Executive Order 14335, Enabling Competition in

the Commercial Space Industry. The order tasks the Commerce Secretary with developing a process for individualized mission authorizations for activities not currently covered by existing regulations, with the goal of promoting American competitiveness in space.

Federal Agency Space News

National Aeronautics and Space Administration

[NASA Cost-Saving Technology Demo is Ready for Launch](#) (November 26, 2025)

[NASA Astronaut Chris Williams, Crewmates Arrive at Space Station](#) (November 27, 2025)

[Crew from NASA, Roscosmos Launching to Station on NASA+](#) (November 27, 2025)

[NASA Tests Drones in Death Valley, Preps for Martian Sands and Skies](#) (December 2, 2025)

U.S. Department of Defense

[War Department Asks Industry to Make More Than 300K Drones, Quickly, Cheaply](#) (December 2, 2025)

U.S. Space Force

[GT 254: AFGSC Validates Reliability, Readiness of ICBM Force with Minuteman III Test Launch](#) (November 20, 2025)

[Space, Air Force Integration Powers DAF Battle Network](#) (December 3, 2025)

International

Articles & Quotes

[ESA Member States Pledge Record Level of Funding](#) (*Space Policy Online*)

European space ambitions received a boost as ESA member states pledged over €22 billion for the next three years, marking a record increase of 32% from 2022 levels. The funding, finalized during the 2025 Ministerial Council meeting in Bremen, underscores renewed commitments to independent space access, Earth and space science, and exploration despite geopolitical headwinds. ESA leadership highlighted the budget as vital for strengthening Europe's role in space, with notable support for lunar and Mars missions, the ExoMars rover, and strategic partnerships with NASA on the Artemis program. While not all proposed exploration funding was secured, ESA will rebalance allocations in early 2026 to preserve key initiatives.

China Moves to Integrate Commercial Space into Its National Space Development Plan (*Space News*)

China's top space agency has formally integrated commercial space into its national strategy, signaling plans to build a coordinated, state-backed commercial ecosystem by 2027. A new action plan from the China National Space Administration outlines 22 measures to align private firms with national goals, including shared infrastructure access, open research programs and government procurement incentives. The blueprint envisions commercial roles in space resource extraction, biopharma, space tourism, debris mitigation and more. The move reflects Beijing's broader strategy to use industrial policy to drive dominance in strategic sectors and responds to U.S. commercial space advances. Additional plans are expected during China's political sessions in March 2026 and in a new five-year space white paper later next year.

Russian Launch Site Mishap Shows Perilous State of Storied Space Program (*The New York Times*)

A recent mishap at Russia's Baikonur Cosmodrome has left the country temporarily unable to launch astronauts to the International Space Station (ISS), after the exhaust from a successful Soyuz launch damaged a critical service platform. The incident underscores the declining reliability of Russia's once-dominant space program and could jeopardize its contributions to ISS operations, particularly given the importance of Soyuz-launched Progress vehicles for maintaining the station's orientation. Although Roscosmos claims repairs are underway, analysts warn the timeline could stretch beyond a year, raising questions within the executive branch and among international partners about Russia's capacity to meet ISS obligations and the need for more resilient space infrastructure moving forward.

Top US Official Berates Europe Over Cutting American Industry Out of Defense Buildup (*Politico*)

Tensions flared behind closed doors at this week's NATO foreign ministers meeting, as Deputy Secretary of State Christopher Landau privately rebuked European allies for excluding American firms from major defense buildup programs. Landau warned ministers not to "bully" U.S. companies out of arms contracts tied to European Union (EU) initiatives like the €150 billion Security Action for Europe (SAFE) program, which caps third-country participation at 35%. The sharp exchange highlights ongoing U.S. frustration with European defense industrial policy, especially as several North Atlantic Treaty Organization (NATO) members increase investments in rearmament and Ukraine support. Landau's remarks, delivered in the absence of Secretary of State Marco Rubio who skipped the meeting, follow broader Trump administration critiques of NATO burden-sharing and EU trade practices, raising new concerns in Brussels about the trajectory of transatlantic defense cooperation. With NATO allies pledging \$4 billion to back U.S. arms shipments to Ukraine, the diplomatic friction is expected to intensify as EU programs ramp up in early 2026.

Check out below for comment opportunities, requests for proposals, notices of proposed rulemaking and a look at the week ahead in space events:

Comment Opportunities (RFIs)

Drone Dominance

Department of Defense

Close Date: December 10, 2025

Common Autonomous Multi-Domain Launcher (CAML) RFI - Autonomous Mobility Platform

Department of Defense

Close Date: December 15, 2025

Requests for Proposals (RFPs)

Proposal for Lease of the Flight Research Facility (Hangar) at Glenn Research Center (GRC).

National Aeronautics and Space Administration

Close Date: December 13, 2025

Notices of Proposed Rulemakings (NPRMs)

No new proposed rules.

Upcoming Space Events

ASGSR Annual Meeting

ASGSR

December 3-6, 2025

WIA International Security Space Partners Event

WIA

December 8, 2025

Senate Commerce Cmte (second) vote on Isaacman nomination

Senate CST

December 8, 2025

Committee on Planetary Protection Fall Meeting 2025

CoPP

December 9-10, 2025

2025 Spacepower Conference

The Space Force Association

December 10-12, 2025

Galloway IISL Symposium

IISL

December 11, 2025

Space Deterrence Forum (classified)

NSSA

December 16, 2025

Aerospace Safety Advisory Panel

NASA

December 19, 2025

The 247th American Astronomical Society meeting

AAS

January 4-8, 2026

Annual Meeting of the Lunar Exploration Analysis Group

NASA

January 6-8

Commercial Space Week

Spacecom

January 27-30

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