



ASTRACOMMEX REGIONAL SATELLITE COMMUNICATION INC.

To:

**National Frequency Agency**

925 3 hertz boulevard  
98479 Starvalis  
Celestria

15 October 2020

930 **Re: Astracommex Regional's response on the request for atmospheric environmental impact assessment**

Dear Director,

935 I am writing to you on behalf of Astracommex Regional in response to your recent request for additional materials concerning the atmospheric impact of Astra satellite reentries. While we share your commitment to preserving our planet's atmosphere, we find the nature of your request to be outside the reasonable scope of current environmental regulatory frameworks, namely, the National Environmental Protection Act ("NEPA").

940 NEPA's Article IV exempts existing projects from retroactive application. Our current submission on 1 September 2020 is not a new application but a modification request to existing projects with the same agency (i.e., the NFA). The NFA had previously authorized the spectrum for Astra System operations in Celestria via the RDF Agreement on 1 October 2016. Modifications to this spectrum, necessitated by Celestria Space Agency's directive to minimize astronomical light interference, should not trigger a complete reevaluation under the NEPA.

945 Even if the NEPA applies, Astracommex Regional shouldn't bear the burden to provide positive evidence to prove that reentries will not negatively impact the atmosphere. The study cited in your request does not refute our argument that the alumina produced by Astra satellites would be a fraction of a percentage of all metals introduced into the atmosphere naturally by meteoroids. There is no concrete evidence linking reentering satellites to environmental harm.

950 Importantly, the design and operation of Astra satellites fully comply with both national and international guidelines for space debris mitigation and environmental impact. Our satellites are engineered to be fully demisable, ensuring that they burn up entirely upon re-entry into the Earth's atmosphere, leaving no physical debris that could contribute to environmental harm.

Due to the reasons mentioned above, we respectfully decline to provide additional materials.

Respectfully submitted,

955

Jeffrey Myskin