ComtIQ

FAA Part 450 first wave

FAA-2026-9934 · 9935 · 9936 · 9940 · 9941 · Proposed rule · comments October 5, 2026 to November 4, 2026 (30 days)

QUESTION

What did licensed operators ask the FAA to change in the five Part 450 proposals of October 5, 2026, and what does that record tell a company preparing comments on the three follow-on proposals due December 9, 2026?

BOTTOM LINE

No organization opposes any of the five proposals. Organizations filed 28 letters. Twenty-seven address the substance and support the proposal they answer, and the other is a request for more time from the trade association, which also filed in support. The only opposition in 48 comments comes from one individual. The FAA has not yet answered any of these comments. ComtIQ judges it very likely that the agency finalizes all five with their main change intact, and treats the timing and the final wording of each rule as open. For the December 9 round, the first wave shows which comment strategies were the most concrete. The strongest letters propose exact regulatory text, tie each request to a sentence of the preamble, and name the downstream sections affected (§ 450.35(a), § 450.211). Whether those strategies succeed cannot be judged until the FAA publishes its responses. No extension of the first comment period had been published by November 19, so the same 30 days should be planned as fixed.

8 FORECASTS TO SCORE WHEN THE FINAL RULE PUBLISHES

#	FORECAST	LIKELIHOOD	CONFIDENCE	CONFIRMED IF
1	By December 31, 2027, a final rule in each of the five dockets adopts the core change listed for that docket in the ComtIQ report	Very likely	Moderate	Federal Register, final text of each section
2	All five final rules published by June 30, 2027	Likely	Low	Federal Register
3	The final rule in FAA-2026-9935 removes both email and physical electronic storage as ordinary filing methods under § 413.7(a), so that applicants must use an electronic method approved by the Administrator	Very unlikely	High	Filing methods listed in the final text of § 413.7(a)
4	The final rule in FAA-2026-9936, in text or preamble, says expressly whether an applicant must address § 450.115(c) or (d) for portions of the flight safety analysis performed by a Federal range	Likely	Moderate	Final rule and preamble; a general statement that does not mention Federal ranges or Federal entities does not count
5	The final text of § 450.115(d)(2) contains the "significant uncertainty" limit	Roughly even	Low	Final text of § 450.115(d)(2)
6	The final rule in FAA-2026-9940 no longer carries two different FAA savings figures per application	Very likely	High	Final rule, regulatory impact section; one corrected figure, an express correction or removal of the per-application estimate each count, and the log records which of the three occurred
7	The final rule in FAA-2026-9941, in text or preamble, says expressly whether vehicles, vessels or temporary structures are within § 450.137(c)(6)	Likely	Moderate	Final rule and preamble; an express statement on any one of the three counts
8	For at least one of the five final rules, a lawsuit or petition seeking judicial review is filed in a federal court within 60 calendar days of that rule's publication	Very unlikely	Low	Federal court dockets, with each rule's window counted from its own publication date; the 60 days are an observation window chosen for scoring and not a statement of the filing deadline

WHAT THE RECORD SHOWS

27 of 28	Support is unanimous among the organizations that filed, and no public-interest organization filed.
20 of 28	Four organizations filed in all five dockets, and two of them filed short endorsements without requesting changes to regulatory text.
4 of 5	The request that recurs across dockets is to move the preamble into the rule.
4 of 4	Every organization that addresses the electronic-only alternative asks the FAA not to adopt it now.

WHO SHOULD ACT NOW

Operators commenting on the second wave	File docket-specific comments on FAA-2026-9937, 9942 and 9943 that propose regulatory text, tie each request to the preamble and state the effect on § 450.35(a) and § 450.211
Operators that did not file in the first wave	Consider a short late letter supporting a specific request already on the record
Spaceports, local governments and insurers near launch sites	Say whether temporary structures, vehicles and vessels belong in the § 450.137(c)(6) analysis before the final rule

1 of 5	The economic analysis is thin, and one of the five contains an arithmetic conflict.	All readers	Watch the five dockets for an extension, FAA contact summaries and the final rules

DATES TO WATCH December 9, 2026, comments close on FAA-2026-9937, FAA-2026-9942 and FAA-2026-9943.

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