FAA Part 450 first wave

What licensed operators asked the FAA to change in five launch licensing proposals

DOCKETS

FAA-2026-9934 · 9935 · 9936 · 9940 · 9941

RULES

FAA-2026-9934, Simplifying Physical Containment Requirements; FAA-2026-9935, Digital Modernization for Licensing Electronic Application Submissions; FAA-2026-9936, Streamlining Flight Safety Analysis Methodology Means of Compliance; FAA-2026-9940, Lightning Hazard Mitigation Burden-Reducing Exception; FAA-2026-9941, Overpressure Blast Effects Analysis Burden Reducing Clarification

AGENCY

Transportation Department, Federal Aviation Administration

RIN

2120-AM38, 2120-AM39, 2120-AM40, 2120-AM30, 2120-AM31

STAGE

Proposed rule

COMMENT PERIOD

October 5, 2026 to November 4, 2026 (30 days)

DATA CUTOFF

Nov. 19, 2026

QUESTION THIS REPORT ANSWERS

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 UP FRONT

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.

The open question is the wording of the final rules. Operators with pending or future applications used this round to ask the FAA to write its preamble explanations into the regulatory text, to keep email as a filing method, and to say that the new submissions do not become a gate before an application is accepted or a reason to reopen methods already accepted. Those requests come from six filers. SpaceX and Boeing, which filed in every docket, asked for no change to any regulatory text.

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.

KEY FINDINGS

1. **Support is unanimous among the organizations that filed, and no public-interest organization filed.** Nine organizations filed 28 letters, eight businesses and one trade association. 27 of 28 letters address the substance and each supports the proposal it answers, and the other is the trade association's request to extend one comment period (9936-0004). The tables in this report count that request among the supportive comments because it endorses the rulemaking, so the 45 supportive readings include it. No environmental group, state or local government, tribe, union, spaceport operator or aviation association filed in any of the five dockets. The FAA's July 2026 proposal to waive environmental statutes for launch licensing (FAA-2026-8614) drew 3,203 posted comments, 55 of them from nonprofit groups, nearly all opposed. The record shows the absence and does not show the reason for it. The two proceedings differ in subject,

visibility and who is affected. Confidence: high for the counts. Source: ComtIQ censuses of the five dockets and of FAA-2026-8614.

2. **Four organizations filed in all five dockets, and two of them filed short endorsements without requesting changes to regulatory text.** The four account for 20 of 28 organization letters. SpaceX filed five letters of about one page that support each proposal and request no change to regulatory text; its one recommendation is that the FAA build AI completeness checks into the LEAP portal (9935-0010). Boeing filed five short letters of support with no requests. Blue Origin proposed regulatory text or specific confirmations in every docket. The Commercial Space Federation filed one joint letter in all five. The working record for the final rules comes from Blue Origin, the Federation, Relativity Space, Inversion, Firefly Aerospace and N2L. Confidence: high. Source: full read of the 28 letters.
3. **The request that recurs across dockets is to move the preamble into the rule.** In 4 of 5 dockets a filer points to a sentence of the preamble that the proposed text does not contain and asks the FAA to codify it. The instances are the statement that no risk analysis is needed for a contained phase (9934-0006), the limit of the benchmark comparison to cases of significant uncertainty (9936-0008, 9936-0011), clearance by surveillance for the lightning exception (9940-0007), and the limit of the blast analysis to existing locations (9941-0008). Relativity gives the reason in plain terms, that reviewers would apply the text and not the preamble (9936-0011). Confidence: high. Source: the letters cited.
4. **Every organization that addresses the electronic-only alternative asks the FAA not to adopt it now.** 4 of 4 organizations that address it take that position. Blue Origin, the Federation and Firefly oppose making an approved electronic method the only filing path in this final rule, and Relativity asks that email stay. Their common ground is that LEAP is unfinished and a single path would be a single point of failure for time-sensitive filings. The Federation would accept the mandate in a later rulemaking with a contingency method. Firefly wants email kept in § 413.7(a) as a method usable as of right. No organization supports adopting the alternative now, and SpaceX and Boeing do not address it. Individuals who comment on the point say the same. Confidence: high. Source: 9935-0009, 9935-0011, 9935-0012, 9935-0014.
5. **The economic analysis is thin, and one of the five contains an arithmetic conflict.** 1 of 5 proposals carries the conflict. The lightning proposal states FAA savings of $3,013 and a total of $3,729 per application in one passage, and $2,416 and $3,131 in a later passage and in its Table 4. ComtIQ confirmed both sets of figures in the published text at 91 FR 63199. Blue Origin asks the FAA to reconcile them and notes that the gap is

close to the $597.40 supervisory approval line (9940-0007). The electronic filing proposal gives the package's only annual estimate, a recurring administrative saving of $16,927 a year from ten minutes per emailed attachment across about 150 files a month. That estimate is questioned by individuals on both of its assumptions, and Firefly says the analysis does not weigh the cost of a portal outage against the alternative (9935-0014). Relativity expects the flight safety analysis change to have a modest effect on review time (9936-0011). No filer supplied cost or schedule data of its own. Confidence: high for the conflict in the published figures, moderate for the rest. Source: 91 FR 63199, 91 FR 63180, the letters cited.

THE RECORD IN NUMBERS

DOCKET	RULE	POSTED	RECEIVED (AGENCY)	ORGANIZATION LETTERS	SUPPORT	OPPOSE	OTHER
FAA-2026-9934	Simplifying Physical Containment Requirements	7	not reported	4	7	0	0
FAA-2026-9935	Digital Modernization for Licensing Electronic Application Submissions	13	not reported	6	11	1	1
FAA-2026-9936	Streamlining Flight Safety Analysis Methodology Means of Compliance	10	not reported	8	9	0	1

DOCKET	RULE	POSTED	RECEIVED (AGENCY)	ORGANIZATION LETTERS	SUPPORT	OPPOSE	OTHER
FAA-2026-9940	Lightning Hazard Mitigation Burden-Reducing Exception	8	not reported	5	8	0	0
FAA-2026-9941	Overpressure Blast Effects Analysis Burden Reducing Clarification	10	not reported	5	10	0	0
Total		48		28	45	1	2

A comment is one count in the docket where it was filed. An organization that answered five proposals counts five times in the total; the table of filers below counts it once.

WHO IS COMMENTING

COMMENTER TYPE	COMMENTS	SUPPORT	OPPOSE	OTHER
Businesses	22	22	0	0
Individuals	16	15	1	0
Trade associations	6	6	0	0
Anonymous	4	2	0	2

Organizations by docket, with the position each letter takes on the proposal of that docket. A blank cell means the organization did not file there.

ORGANIZATION	FAA-2026-9934	FAA-2026-9935	FAA-2026-9936	FAA-2026-9940	FAA-2026-9941
Blue Origin, LLC	Support with changes	Support with changes	Support with changes	Support with changes	Support with changes
Commercial Space Federation	Support	Support with changes	2 filings: Support; Support with changes	Support with changes	Support
Space Exploration Technologies Corp. (SpaceX)	Support	Support with changes	Support	Support	Support
The Boeing Company	Support	Support	Support	Support	Support
Inversion			Support with changes	Support with changes	
Relativity Space, Inc.		Support with changes	Support with changes		
Firefly Aerospace Inc.		Support			
N2L, Inc.					Support with changes
Persistence Analytics Group LLC			Support with changes		

Individuals are reported only in aggregate: 20 comments across the package came from individuals or anonymous filers. Organizations are named in this report where a finding or an argument rests on them; the list of all filers with their stance is in the data file organizations.csv.

Letters filed in more than one docket

ORGANIZATION	DOCKETS	LETTERS
Commercial Space Federation	FAA-2026-9934 · 9935 · 9936 · 9940 · 9941	FAA-2026-9934-0008, FAA-2026-9935-0011, FAA-2026-9936-0010, FAA-2026-9940-0009, FAA-2026-9941-0009

1 text by individuals or anonymous filers recur across dockets (5 comments); they are counted, not named.

Texts are compared across dockets with the same similarity measure the campaign detector uses within a docket.

The record shows broad alignment in favor of streamlining across the launch and reentry industry, with one material divergence on the scope of the overpressure analysis (see the disputes section). The filers fall into three tiers. The first is package-wide support with no textual requests (SpaceX, Boeing). The second is package-wide support with detailed requests (Blue Origin in five dockets, the Federation in its joint letter). The third is operators that filed only where a proposal touches their operations. Relativity filed on electronic filing and flight safety analysis, Inversion on flight safety analysis and lightning as a licensed reentry operator, Firefly on electronic filing, and N2L, a blast-testing firm, on overpressure. Persistence Analytics Group is a consultancy speaking for itself on flight safety analysis and is not an operator.

The alignments are visible in the text. The Federation and Inversion use nearly the same reasoning and wording on two points, whether § 450.115(d) may be shown for each sub-analysis separately and how it applies to work done by a Federal range (9936-0010, 9936-0007), and Relativity reaches the same range question independently (9936-0011). Blue Origin, Relativity and the Federation each anchor requests in the March 2026 report of the FAA's Part 450 rulemaking committee (SpARC). That report is the shared agenda behind the letters, and it is the best guide to what the same filers will ask for in the second wave.

Missing from the record are Rocket Lab, Stoke Space and Spaceport America, all of which filed on the statutory waiver proposal in FAA-2026-8614. No spaceport licensed under part 420 filed, although the Federation's letter raises a complaint about them (see the arguments section). No insurer, range safety contractor, university or professional society filed. The 20 comments from individuals and anonymous filers support the proposals with adjustments in all but three cases, and several of them engage with the regulatory impact analysis more closely than most company letters do.

ARGUMENTS

Argument types across the package, by number of comments.

ARGUMENT TYPE	COMMENTS	SHARE OF CODED
Alternative proposed	25	52.1%
Safety risk	17	35.4%
Costs and benefits	12	25.0%
No reason given	10	20.8%
Regulatory impact analysis	8	16.7%
Scientific evidence	6	12.5%
Enforcement feasibility	6	12.5%
Comment period	2	4.2%

FAA-2026-9934, Simplifying Physical Containment Requirements

THEME	COMMENTS	SHARE OF CODED
regulatory-burden-streamlining	6	85.7%
regulatory-clarity-consistency	6	85.7%
reliance-on-physical-limits	3	42.9%
public-safety-risk	2	28.6%
launch-industry-competitiveness	1	14.3%

PROVISION	COMMENTS OPPOSING	SUPPORTING	ASKING TO MODIFY	MENTIONING ONLY
b450-133-still-required-other-phases	0	0	1	0
c1-valid-method-description	0	0	1	0
c2-representative-mission-data	0	0	1	0
cost-savings-estimate	0	0	0	1
merged-flight-hazard-area-b1	0	2	1	0
reentry-vehicle-coverage	0	1	0	0
remove-450-133-reference	0	3	0	0

FAA-2026-9935, Digital Modernization for Licensing Electronic Application Submissions

THEME	COMMENTS	SHARE OF CODED
leap-readiness-and-reliability	11	84.6%
licensing-efficiency-streamlining	9	69.2%
transparency-and-recordkeeping	4	30.8%
cybersecurity-and-data-protection	2	15.4%
regulatory-flexibility-and-future-technology	2	15.4%
commercial-space-growth-competitiveness	1	7.7%
fairness-of-process-and-notice	1	7.7%
safety-and-oversight-quality	1	7.7%
small-and-new-entrants-access	1	7.7%

PROVISION	COMMENTS OPPOSING	SUPPORTING	ASKING TO MODIFY	MENTIONING ONLY
administrator-discretion-approval	1	0	0	0
align-alternative-time-frames-404-15	0	4	0	0
align-safety-element-approvals-414-13	0	4	0	0
align-waiver-requests-404-3	0	4	0	0
alternative-mandatory-electronic-only	3	0	0	0
cost-savings-estimate	0	0	0	1
keep-email-and-physical-storage	0	4	0	0
other-electronic-method-413-7	0	5	1	0
remove-paper-applications	0	2	0	0

FAA-2026-9936, Streamlining Flight Safety Analysis Methodology Means of Compliance

THEME	COMMENTS	SHARE OF CODED
regulatory-burden-efficiency	9	90.0%
regulatory-clarity-consistency	8	80.0%
licensing-speed-industry-competitiveness	5	50.0%
faa-review-workload-expertise	2	20.0%
fidelity-validation-rigor	2	20.0%
further-deregulation-part-450	1	10.0%

THEME	COMMENTS	SHARE OF CODED
public-safety-risk	1	10.0%
transparency-public-participation	1	10.0%

PROVISION	COMMENTS OPPOSING	SUPPORTING	ASKING TO MODIFY	MENTIONING ONLY
benchmark-comparison-significant-uncertainty	0	0	2	0
comment-period-30-days	1	0	1	0
cross-reference-450-137-139-108	0	3	0	0
merge-c1-c2-assumptions	0	1	0	0
methodology-to-methods	0	1	0	0
sec-450-101g-framing-and-vv	0	0	1	1
sec-450-115-c-retained-items	0	1	1	0
sec-450-115-d-single-submission	0	3	4	0
sec-450-139-f-explicit-methods	0	1	0	0

FAA-2026-9940, Lightning Hazard Mitigation Burden-Reducing Exception

THEME	COMMENTS	SHARE OF CODED
regulatory-clarity	6	75.0%
deregulation-streamlining	4	50.0%
industry-competitiveness	3	37.5%
transparency-public-participation	2	25.0%

THEME	COMMENTS	SHARE OF CODED
critical-assets-protection	1	12.5%
public-safety-lightning	1	12.5%
reliance-on-modeling	1	12.5%

PROVISION	COMMENTS OPPOSING	SUPPORTING	ASKING TO MODIFY	MENTIONING ONLY
clearance-exception-450-163-b	0	4	1	0
clearance-methods-c3iii	0	1	1	0
cost-savings-estimate	0	0	1	0
flight-path-method-c3i	0	1	1	0
physics-constraint-standard	0	0	3	0
replace-elos-process	0	2	0	0
representative-limits-c3ii	0	1	0	0
scope-all-operations	0	1	0	0
surveillance-unbounded-areas	0	0	3	0

FAA-2026-9941, Overpressure Blast Effects Analysis Burden Reducing Clarification

THEME	COMMENTS	SHARE OF CODED
regulatory-clarity-ambiguity	9	90.0%
industry-regulatory-burden	4	40.0%
licensing-streamlining-speed	4	40.0%

THEME	COMMENTS	SHARE OF CODED
public-safety-risk	4	40.0%
data-and-analysis-quality	3	30.0%
window-breakage-injury	1	10.0%

PROVISION	COMMENTS OPPOSING	SUPPORTING	ASKING TO MODIFY	MENTIONING ONLY
cost-savings-estimate	0	1	0	0
delete-redundant-members-of-public	0	3	0	0
deregulatory-streamlining-eo-14335	0	3	0	0
existing-windows-intent-reading	0	0	2	0
remove-hypothetical-450-137-c-6	0	4	1	0
retain-risk-thresholds	0	0	0	2

Themes and provisions are each docket's own, from its codebook; provisions are coded for organizations only. Oppose, support and modify are a stance on the provision, not the comment's position on the proposal.

There is no opposing side among organizations, so the arguments worth weighing are the ones that ask the FAA to go further or to be more precise.

The strongest argument in the package is about what binds. Blue Origin and Relativity show in three dockets that the preamble promises a narrower burden than the proposed text delivers, and both propose exact language to close the gap (9934-0006, 9936-0008, 9936-0011, 9940-0007). These are arguments the FAA will have to answer. The agency may still have reasons, such as flexibility or drafting practice, to keep a clarification in the preamble.

The second is about sequence. Section 450.35(a) makes an accepted means of compliance a condition of application acceptance for listed items, including flight safety analysis under § 450.115(b)(1) and lightning mitigation under § 450.163(a)(1). Relativity argues that new § 450.115(d), framed as the showing of compliance with § 450.115(b), could be read as one more document required before an application can be filed (9936-0011). Blue Origin asks for confirmation that the new method-level items and the lightning exception are reviewed during the application period (9936-0008, 9940-0007). If the FAA is silent, a change presented as burden reduction could lengthen pre-application consultation.

The third is about reopening. Relativity and Blue Origin ask that methods already accepted stay accepted and that review of a change be limited to the change. Both cite the FAA's own figures in the proposal, including 10,747 FAA hours for six modifications of one license in a year.

On resilience, Firefly makes the fullest case against a single filing path. In Firefly's account, a fallback that depends on the Administrator's approval during an outage is not one an operator can plan around, and one delayed launch would cost more than the ten-year saving the FAA estimates (9935-0014). Firefly gives no figure for that cost.

One argument runs toward caution. N2L supports removing "hypothetical" from the blast analysis and then asks the FAA to state when the inventory of existing structures must be current, and to confirm that foreseeable launch-day occupancy such as viewing areas, campgrounds and vessels with cabins remains in scope (9941-0005). It adds that the larger uncertainty in far-field results is the explosive yield assumed for liquid oxygen and methane, for which the available yield curves are interim. Persistence Analytics Group makes a parallel point on flight safety analysis, that information stated once still needs a record of why it applies to each analysis (9936-0002).

Beyond the five proposals, the Federation asks for further rulemakings based on the SpARC report and for reform of part 420, and says spaceport licensees are asking vehicle operators to demonstrate flight safety analysis compliance to them, which it describes as in tension with federal preemption of launch vehicle authorization (footnote 7 of its letter). Blue Origin asks the FAA to consider a designated engineering representative framework modeled on aircraft certification, and to name the statutory change needed if chapter 509 does not permit it (9935-0009). Neither is within the scope of these rules. Both signal the next requests.

WHERE THE DISPUTES ARE

Provisions ranked by the number of organizations asking to change or remove them, docket by docket. Each row is one organization, what it asks as the coding system summarised it, and the comment to open; the summary is a reading, not a quotation.

FAA-2026-9934

b450-133-still-required-other-phases: The proposal leaves Sec. 450.133 flight hazard area analysis in force for any phase of flight where physical containment is not the only hazard control strategy.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 0. Direction of the asks: clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Confirm that a contained phase may be defined by a flight event and vehicle state, and that the flight safety analysis for the preceding phase ends at that boundary.	FAA-2026-9934-0006

c1-valid-method-description: New Sec. 450.110(c)(1) would require a description of a valid method for determining the flight hazard area, documenting compliance with Sec. 450.101(g) through scientific principles, statistical methods, assumptions, and validation and verification evidence.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 0. Direction of the asks: loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Confirm that a documented maximum-energy bounding calculation is sufficient validation evidence, without validation against flight data or a higher-fidelity model.	FAA-2026-9934-0006

c2-representative-mission-data: New Sec. 450.110(c)(2) would require tabular data and graphs of the flight hazard area for a representative mission.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 0. Direction of the asks: loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Confirm that a license may authorize a range of missions on a representative analysis, and that mission-specific areas within those bounds need no license modification under § 450.211.	FAA-2026-9934-0006

merged-flight-hazard-area-b1: Merge current Sec. 450.110(b)(1) and (b)(2) into a single (b)(1) requiring a flight hazard area that ensures the vehicle lacks sufficient energy for any flight hazard to reach outside it.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 2. Direction of the asks: loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Add § 450.110(d) stating no flight safety analysis under §§ 450.113-450.139 is required for a contained phase. Clarify whether the (b)(1) area must bound far-field overpressure and toxic hazards.	FAA-2026-9934-0006
The Boeing Company	Businesses	support	Adopt the proposed single flight hazard area approach that lets operators forgo a probabilistic risk analysis.	FAA-2026-9934-0004
Commercial Space Federation	Trade associations	support	Finalize the proposed streamlining rules, including the physical containment simplification, and pursue further part 450 reform.	FAA-2026-9934-0008

reentry-vehicle-coverage: Add "reentry" to Sec. 450.110(b)(1) and (c)(1) and to the physical containment definition in 14 CFR 401.7 so they cover launch or reentry vehicles.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 1. Direction of the asks: clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Commercial Space Federation	Trade associations	support	Encourages FAA to review other regulations where "reentry" was inadvertently omitted, e.g., the definition of "payload" in § 401.7.	FAA-2026-9934-0008

remove-450-133-reference: Remove the requirement in 14 CFR 450.110(b)(1) that the flight hazard area be developed in accordance with Sec. 450.133 when physical containment is used.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Finalize the NPRM so physical containment operators need not develop flight hazard areas under the existing analysis.	FAA-2026-9934-0007
The Boeing Company	Businesses	support	Adopt the proposed single flight hazard area approach that lets operators forgo a probabilistic risk analysis.	FAA-2026-9934-0004
Blue Origin, LLC	Businesses	support	Add § 450.110(d) stating that no flight safety analysis is required for a phase of flight using physical containment, with a conforming change to § 450.113(a).	FAA-2026-9934-0006

FAA-2026-9935

alternative-mandatory-electronic-only: Alternative FAA is considering on which it seeks comment: require all applications and requests to be submitted through an Administrator-approved electronic method, eliminating email and physical electronic storage.

Organizations opposing it 3, asking to modify it 0, supporting it as proposed 0. Direction of the asks: tighten 1, loosen 2.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	oppose	Do not adopt in the final rule; if a mandatory electronic method is adopted later, first publish a contingency procedure for system outages naming the alternate method and how the date of receipt is determined.	FAA-2026-9935-0009
Commercial Space Federation	Trade associations	oppose	Do not adopt the alternative to remove email and physical electronic storage options at this time; defer to a future rulemaking.	FAA-2026-9935-0011
Firefly Aerospace Inc.	Businesses	oppose	Do not adopt the alternative requiring all submissions via an Administrator-approved electronic method.	FAA-2026-9935-0014

administrator-discretion-approval: Leave the approval of acceptable electronic methods and the acceptable form and manner of submission to the Administrator's discretion, with no criteria or process in the rule text.

Organizations opposing it 1, asking to modify it 0, supporting it as proposed 0. Direction of the asks: tighten 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Firefly Aerospace Inc.	Businesses	oppose	Redundancy must be in the regulations, not left to the Administrator's discretion to approve a fallback.	FAA-2026-9935-0014

other-electronic-method-413-7: Amend 14 CFR 413.7(a) and add new (a)(3) to allow license and permit applications to be filed by any other electronic method approved by the Administrator, in a form and manner acceptable to the Administrator, such as LEAP.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 5. Direction of the asks: tighten 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Add minimum submission controls to 413.7(a)(3) (record of date/time and documents received, revision history, preservation of confidentiality and export control markings) and a new (a)(4) recognizing secure read-only FAA access to an applicant-maintained repository.	FAA-2026-9935-0009
Relativity Space, Inc.	Businesses	support	Keep email as a permitted submission method alongside LEAP rather than removing it now.	FAA-2026-9935-0012
Commercial Space Federation	Trade associations	support	Allow applications via electronic means approved by the Administrator; ensure a contingency if LEAP is unavailable.	FAA-2026-9935-0011
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Embrace AI capabilities within LEAP to check applications for completeness and flag gaps early.	FAA-2026-9935-0010
The Boeing Company	Businesses	support	Adopt the proposed changes to move license application submission to digital methods including LEAP.	FAA-2026-9935-0007
Firefly Aerospace Inc.	Businesses	support	Keep email and physical electronic storage as submission methods in 413.7(a) rather than adopting the electronic-only alternative.	FAA-2026-9935-0014

align-alternative-time-frames-404-15: Revise 14 CFR 404.15(b) so requests for alternative time frames must be submitted by a method listed in 413.7(a), which removes paper filing.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 4.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Relativity Space, Inc.	Businesses	support	Keep email as a permitted submission method alongside LEAP rather than removing it now.	FAA-2026-9935-0012
Commercial Space Federation	Trade associations	support	Adopt electronic submission via LEAP but keep email and physical electronic storage as back-up options, deferring their removal to a future rulemaking.	FAA-2026-9935-0011
Blue Origin, LLC	Businesses	support	Adopt the other-electronic-method and paper-removal changes but not a single mandatory electronic method, and add minimum submission controls and a repository-access option to 413.7(a).	FAA-2026-9935-0009
Firefly Aerospace Inc.	Businesses	support	Keep email and physical electronic storage as submission methods in 413.7(a) rather than adopting the electronic-only alternative.	FAA-2026-9935-0014

align-safety-element-approvals-414-13: Revise 14 CFR 414.13(a) so safety element approval requests filed separately from a license application use the 413.7(a) methods, which removes paper filing.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 4.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Relativity Space, Inc.	Businesses	support	Keep email as a permitted submission method alongside LEAP rather than removing it now.	FAA-2026-9935-0012
Commercial Space Federation	Trade associations	support	Adopt electronic submission via LEAP but keep email and physical electronic storage as back-up options, deferring their removal to a future rulemaking.	FAA-2026-9935-0011

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	support	Adopt the other-electronic-method and paper-removal changes but not a single mandatory electronic method, and add minimum submission controls and a repository-access option to 413.7(a).	FAA-2026-9935-0009
Firefly Aerospace Inc.	Businesses	support	Keep email and physical electronic storage as submission methods in 413.7(a) rather than adopting the electronic-only alternative.	FAA-2026-9935-0014

align-waiver-requests-404-3: Revise 14 CFR 404.3(d) so petitions for waiver must be filed using one of the methods in 413.7(a), which removes paper filing of waiver requests.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 4.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Relativity Space, Inc.	Businesses	support	Keep email as a permitted submission method alongside LEAP rather than removing it now.	FAA-2026-9935-0012
Commercial Space Federation	Trade associations	support	Adopt electronic submission via LEAP but keep email and physical electronic storage as back-up options, deferring their removal to a future rulemaking.	FAA-2026-9935-0011
Blue Origin, LLC	Businesses	support	Adopt the other-electronic-method and paper-removal changes but not a single mandatory electronic method, and add minimum submission controls and a repository-access option to 413.7(a).	FAA-2026-9935-0009
Firefly Aerospace Inc.	Businesses	support	Keep email and physical electronic storage as submission methods in 413.7(a) rather than adopting the electronic-only alternative.	FAA-2026-9935-0014

FAA-2026-9936

sec-450-115-d-single-submission: New Sec. 450.115(d) would require the rationale for level of fidelity, benchmark comparability, and risk mitigations to be submitted once for the flight safety analysis method as a whole instead of for each sub-analysis method.

Organizations opposing it 0, asking to modify it 4, supporting it as proposed 3. Direction of the asks: tighten 1, clarify 4.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Inversion	Businesses	modify	Amend 450.115(d) to let operators demonstrate compliance for the FSA method as a whole, each sub-analysis method, or a combination; clarify implementation for sub-analyses performed by a Federal entity.	FAA-2026-9936-0007
Commercial Space Federation	Trade associations	modify	Explicitly clarify that § 450.115(d) may be demonstrated for the FSA as a whole, for multiple sub-analyses together, or for each sub-analysis separately; clarify whether it applies to portions performed by a Federal entity safety partner.	FAA-2026-9936-0010
Persistence Analytics Group LLC	Businesses	modify	Keep a lightweight traceability matrix linking the common method to analysis-specific assumptions, dependencies, limitations and material-change triggers; distinguish validation of the method from validation of its applicability to each analysis.	FAA-2026-9936-0002
Relativity Space, Inc.	Businesses	modify	Clarify that Sec. 450.115(d) need not be accepted before the application under Sec. 450.35(a)(1); allow different levels of fidelity within the FSA; state that (c) and (d) apply only to portions performed by the applicant (federal range services);	FAA-2026-9936-0011

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	support	Confirm bounding analyses are an acceptable basis for the level-of-fidelity rationale; confirm method-level items are application elements evaluated during the review period, not prerequisites to acceptance; state that previously accepted methods are not reopened.	FAA-2026-9936-0008
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Finalize the NPRM consolidating three of the six § 450.115(c) items into a single submission.	FAA-2026-9936-0009
The Boeing Company	Businesses	support	Adopt the proposed revisions as written to eliminate repeated submissions and reduce licensing effort.	FAA-2026-9936-0005

benchmark-comparison-significant-uncertainty: Proposed Sec. 450.115(d)(2) would, as the preamble explains, limit benchmark-to-operating-condition comparison to benchmarks whose significant uncertainty would affect the fidelity of the overall FSA method, rather than every benchmark.

Organizations opposing it 0, asking to modify it 2, supporting it as proposed 0. Direction of the asks: loosen 1, clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Write the significant-uncertainty limit into 450.115(d)(2) text, or alternatively define 'significant uncertainty' with examples in the preamble or AC 450.115-1.	FAA-2026-9936-0008
Relativity Space, Inc.	Businesses	modify	Revise Sec. 450.115(d)(2) so it expressly applies only to benchmarks where significant uncertainty would impact fidelity, conforming the text to the preamble.	FAA-2026-9936-0011

comment-period-30-days: FAA's choice of a 30-day comment period closing November 4, 2026.

Organizations opposing it 1, asking to modify it 1, supporting it as proposed 0. Direction of the asks: tighten 1, loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Inversion	Businesses	oppose	Extend the public comment period.	FAA-2026-9936-0007
Commercial Space Federation	Trade associations	modify	Extend the comment period by at least two weeks, to no earlier than November 18, 2026.	FAA-2026-9936-0004

sec-450-101g-framing-and-vv: Revised Sec. 450.115(c) introductory text would state that method descriptions must demonstrate compliance with Sec. 450.101(g), would drop the application-requirement framing, and proposed (c)(2) would remove the Sec. 450.101(g) reference from the validation and verification item.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 0. Direction of the asks: loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Revise 450.115(c)(2) to allow validation evidence by documented engineering rationale where no comparable benchmark exists.	FAA-2026-9936-0008

sec-450-115-c-retained-items: Revised Sec. 450.115(c) would keep per-method descriptions of scientific principles and statistical methods, assumptions and justifications, and validation and verification evidence for each sub-analysis and flight safety limits method.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 1. Direction of the asks: clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin, LLC	Businesses	modify	Confirm in the preamble that descriptions of methods under revised 450.115(c) are application material evaluated during the review period, not prerequisites to acceptance.	FAA-2026-9936-0008
Relativity Space, Inc.	Businesses	support	Revise proposed Sec. 450.115(d) text to conform to the preamble and prevent added review burden, including limiting (d)(2) to significant-uncertainty benchmarks and barring reopening of accepted methods.	FAA-2026-9936-0011

cross-reference-450-137-139-108: The rule would add or correct 'in accordance with Sec. 450.115(c)' cross-references in Sec. Sec. 450.108(g)(1), 450.137(c)(2)-(5) and 450.139(f)(7)-(8) so Sec. 450.115(c) expressly applies to all descriptions of methods.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
The Boeing Company	Businesses	support	Adopt the proposed revisions as written to eliminate repeated submissions and reduce licensing effort.	FAA-2026-9936-0005
Commercial Space Federation	Trade associations	support	Finalize the FSA single-submission change while clarifying that § 450.115(d) may be demonstrated per sub-analysis or for the FSA as a whole.	FAA-2026-9936-0010
Inversion	Businesses	support	Amend 450.115(d) so operators may demonstrate compliance per sub-analysis or in combination, and clarify federal-entity analyses.	FAA-2026-9936-0007

FAA-2026-9940

physics-constraint-standard: Proposed 450.163(b) regulatory text requires the flight path, including possible debris, to be 'constrained by physics' to remain within an area clear of the public and critical assets, a standard that differs from the looser preamble wording.

Organizations opposing it 0, asking to modify it 3, supporting it as proposed 0. Direction of the asks: clarify 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Confirm debris refers to debris from a failure occurring after the vehicle passes the identified altitude or flight event.	FAA-2026-9940-0007
Commercial Space Federation	Trade associations	modify	Clarify how 'constrained by physics to remain within any area clear of the public and critical assets' differs from the definition of physical containment.	FAA-2026-9940-0009
Inversion	Businesses	modify	Align the "constrained by physics" language with the defined term "physical containment" or explain the difference.	FAA-2026-9940-0006

surveillance-unbounded-areas: The preamble allows operators to use the exception where the lightning hazard region is not bounded by 450.133 hazard areas by surveilling the non-bounded area to ensure it is clear.

Organizations opposing it 0, asking to modify it 3, supporting it as proposed 0. Direction of the asks: clarify 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Include in the regulatory text the surveillance-based clearance described in the preamble, in accordance with 450.161.	FAA-2026-9940-0007
Commercial Space Federation	Trade associations	modify	Clarify whether the area exposed to hazards from a lightning strike is a 'hazard area' and, if so, use that term in the amendments.	FAA-2026-9940-0009

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Inversion	Businesses	modify	Use the defined term "flight hazard area" in 450.163 or clarify how the region differs from a flight hazard area.	FAA-2026-9940-0006

clearance-exception-450-163-b: New 14 CFR 450.163(b) excuses operators from the 450.163(a) lightning mitigation methods for descending phases of flight when the flight path is clear of the public and critical assets once lightning is foreseeable.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 4. Direction of the asks: loosen 1, clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Add surveillance-based clearance to regulatory text; let operator identify the starting point of the exception (altitude or defined flight event); clarify the debris condition refers to failures after the identified point.	FAA-2026-9940-0007
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Adopt the NPRM as proposed.	FAA-2026-9940-0008
Commercial Space Federation	Trade associations	support	Adopt the lightning clearance exception, with clarification of the physics-constraint wording versus physical containment and of 'hazard areas'.	FAA-2026-9940-0009
The Boeing Company	Businesses	support	Adopt the proposed lightning exception as written.	FAA-2026-9940-0004

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Inversion	Businesses	support	Use the defined term "physical containment" in 450.163(b) or clarify how the containment strategy differs from the definition.	FAA-2026-9940-0006

clearance-methods-c3iii: Proposed 450.163(c)(3)(iii) requires a description of the methods used to ensure the areas are cleared of the public and critical assets.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 1. Direction of the asks: loosen 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Let one analysis and description satisfy both 450.163(c)(3) and proposed 450.110(c) when the phase of flight is the same; evaluate the material during the application review period without a pre-accepted means of compliance.	FAA-2026-9940-0007
Commercial Space Federation	Trade associations	support	Adopt the lightning clearance exception, with clarification of the physics-constraint wording versus physical containment and of 'hazard areas'.	FAA-2026-9940-0009

cost-savings-estimate: FAA's finding that the rule imposes no new costs and saves about $715 for industry and $2,416 for FAA per application (about $3,131 total) by avoiding ELOS requests, without an annual estimate.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 0. Direction of the asks: clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Reconcile the inconsistent $3,013 and $2,416 FAA savings figures and qualitatively acknowledge benefits of fewer weather constraints and schedule certainty.	FAA-2026-9940-0007

flight-path-method-c3i: Proposed 450.163(c)(3)(i) requires a description of a valid method for determining flight path limits, including debris, demonstrating compliance with 450.101(g) via scientific principles, statistical methods, assumptions, and validation and verification evidence.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 1. Direction of the asks: clarify 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Inversion	Businesses	modify	Clarify the difference between the 450.163(c)(3)(i) method for determining flight path limits and the simplified method for the flight hazard area in 450.110(c)(1).	FAA-2026-9940-0006
Commercial Space Federation	Trade associations	support	Adopt the lightning clearance exception, with clarification of the physics-constraint wording versus physical containment and of 'hazard areas'.	FAA-2026-9940-0009

FAA-2026-9941

existing-windows-intent-reading: FAA's interpretation that the intent of 450.137(c)(6) is to identify existing windows where people could face individual risk above the 450.101(a) and (b) criteria, rather than possible future or undeveloped locations.

Organizations opposing it 0, asking to modify it 2, supporting it as proposed 0. Direction of the asks: clarify 2.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Make the existing-locations intent explicit in the regulatory text and clarify that new construction is handled via periodic population and structure data updates without requiring a license modification under 450.211.	FAA-2026-9941-0008

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
N2L, Inc.	Businesses	modify	State when 'existing' is determined; document source and date of structure and population data and confirm before each operation that no new occupied structures fall inside the criteria contours.	FAA-2026-9941-0005

remove-hypothetical-450-137-c-6: Remove the word 'hypothetical' before 'location' in 14 CFR 450.137(c)(6) so operators analyze only existing locations where people could be exposed to far-field overpressure risk, not speculative ones.

Organizations opposing it 0, asking to modify it 1, supporting it as proposed 4. Direction of the asks: clarify 2.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	modify	Revise (c)(6) text to refer to locations of existing buildings and other fixed structures identified in the population and structure data used in the flight safety analysis; confirm vehicles, vessels and transient locations are outside scope.	FAA-2026-9941-0008
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Adopt the NPRM as proposed.	FAA-2026-9941-0010
Commercial Space Federation	Trade associations	support	Finalize the removal of 'hypothetical' and the redundant 'members of the public' in 450.137(c)(6).	FAA-2026-9941-0009
The Boeing Company	Businesses	support	Adopt the proposed clarifying changes to the overpressure blast effects analysis.	FAA-2026-9941-0006

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
N2L, Inc.	Businesses	support	Support removal; state in preamble that 'locations' means locations expected to be occupied under foreseeable conditions on the day of operation, including temporary structures, vehicles and vessels, excluding only speculative future development.	FAA-2026-9941-0005

cost-savings-estimate: FAA's finding that the rule yields minor cost savings for FAA and applicants by avoiding correspondence over which locations must be included, and is not a significant regulatory action under E.O. 12866.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 1.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Blue Origin LLC	Businesses	support	No change requested	FAA-2026-9941-0008

delete-redundant-members-of-public: Delete the first use of 'members of the public' in 450.137(c)(6) and reword the paragraph to refer to locations where neighboring operations personnel or other members of the public could be exposed, which FAA says does not change its effect.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
The Boeing Company	Businesses	support	Adopt the proposed clarifying changes to the overpressure blast effects analysis.	FAA-2026-9941-0006
Commercial Space Federation	Trade associations	support	Finalize the removal of 'hypothetical' and the redundant 'members of the public' in 450.137(c)(6).	FAA-2026-9941-0009
N2L, Inc.	Businesses	support	Finalize the change but add preamble or guidance clarifications on data currency, foreseeable temporary occupancy, and yield basis.	FAA-2026-9941-0005

deregulatory-streamlining-eo-14335: The framing of the rule as a burden-reducing, deregulatory action under E.O. 14335 and E.O. 14192 to streamline part 450 licensing.

Organizations opposing it 0, asking to modify it 0, supporting it as proposed 3.

ORGANIZATION	TYPE	STANCE	WHAT IT ASKS	COMMENT
Space Exploration Technologies Corp. (SpaceX)	Businesses	support	Adopt the NPRM as proposed.	FAA-2026-9941-0010
Commercial Space Federation	Trade associations	support	Finalize the removal of 'hypothetical' and the redundant 'members of the public' in 450.137(c)(6).	FAA-2026-9941-0009
Blue Origin LLC	Businesses	support	No change requested	FAA-2026-9941-0008

Electronic-only filing (§ 413.7(a), FAA-2026-9935). The question is whether the final rule adopts the alternative on which the FAA sought comment. Three organizations oppose it now, a fourth asks to keep email, and none supports it. The legal exposure for the FAA lies in adopting an alternative its own analysis did not cost, which Firefly points out. ComtIQ judges adoption of the mandate in this final rule very unlikely. Blue Origin's two additions, minimum submission controls in (a)(3) and read-only access to an applicant repository as an approved method in (a)(4), go beyond the proposal. The FAA is more likely to address them in the preamble or in LEAP guidance than in rule text.

Scope of § 450.115(d) (FAA-2026-9936). Four filers ask how the single submission works in practice. The Federation and Inversion ask that it may be made for the whole analysis, for groups of sub-analyses, or for each one, because debris, blast and toxic analyses rest on different physics and are often done by different entities. Relativity asks for text allowing different levels of fidelity within one analysis. The Federation, Inversion and Relativity ask that the paragraph not reach work performed by a Federal range. These are requests for clarification that cost the FAA nothing in safety terms, and ComtIQ judges it likely that the final rule or its preamble grants most of them. Whether the "significant uncertainty" limit enters the text of (d)(2) or stays in the preamble is a roughly even chance.

"Constrained by physics" and the vocabulary of §§ 450.110 and 450.163 (FAA-2026-9934 and 9940). The Federation and Inversion ask how the lightning exception's standard differs

from the defined term "physical containment" and whether the cleared region is a "flight hazard area." Blue Origin asks that one analysis be allowed to satisfy both sections when the phase of flight is the same. The two proposals were drafted separately and their terms do not match. Aligning them is likely. Blue Origin's request that the operator may start the exception at an earlier defined flight event is a substantive widening and is less certain.

Whether a contained phase needs any flight safety analysis (FAA-2026-9934). Blue Origin asks for a new § 450.110(d) and a conforming change to § 450.113(a), and asks whether the energy-based area must also bound far-field overpressure and toxic hazards. The second question has a safety dimension the proposal does not address, and the FAA will have to answer it in some form.

What "existing locations" covers (FAA-2026-9941). This is the one point where filers disagree with each other. Blue Origin asks the FAA to limit § 450.137(c)(6) to existing buildings and fixed structures and to confirm that vehicles, vessels and transient locations are outside it. N2L asks the FAA to confirm that foreseeable temporary occupancy, including vehicles and vessels, stays inside it, and to require a check of the structure data before each operation. The FAA's preamble speaks of existing windows and does not settle the question. "Existing" describes when a location is there and "fixed" describes what kind of location it is, and removing "hypothetical" decides neither. ComtIQ does not forecast which reading prevails. The choice changes what operators near populated launch sites must document.

Comment period. The Federation asked on October 29 for at least two more weeks on the flight safety analysis proposal (9936-0004), and Inversion asked for an extension in its letter. No extension had been published in the Federal Register by November 19, 2026, and the substantive letters were filed by the original deadline.

COORDINATED CAMPAIGNS

No coordinated campaign met the detector's thresholds in any docket.

AGENCY RESPONSE

Not applicable at the proposed-rule stage. At the final rules, each significant issue above is matched to the preamble's response and unanswered issues are flagged.

OUTSIDE THE RECORD

What was said about the proposal outside the docket: law firm analyses, specialist press, statements and coverage that ComtIQ's analyst read and kept. These sources are not comments; nothing here is counted with the record above. A source marked 'filer' was published by an organization that also filed in the docket: it restates a party's position and is not independent corroboration. The summaries are ComtIQ's; read each source before relying on it.

SOURCE	PUBLISHER	KIND	DATE	SUMMARY
Commercial Space Licensing: DOT Proposes 5 FAA Rule Reforms	Edhat (reprint of DOT/FAA release)	agency	2026-10-06	Reprint of the DOT announcement listing the five proposed rules, including Simplifying Physical Containment Requirements. It cites U.S. launch statistics and a projection of 10,000 FAA-licensed launches and reentries a year by 2035. It confirms the November 4, 2026 comment close for each rule.
Trump’s Transportation Secretary Sean P. Duffy Announces Five Actions to Accelerate Commercial Space Licensing	U.S. Department of Transportation	agency	2026-10-06	DOT press release in which Secretary Duffy announces the five FAA proposed rules, developed with the SPACE Task Force. It presents them as making Part 450 licensing more efficient and flexible while keeping safety standards. It highlights eliminating duplicative safety analyses where a requirement is already covered.

SOURCE	PUBLISHER	KIND	DATE	SUMMARY
FAA Proposes 5 Rules to Streamline Part 450 Commercial Space Licensing	Holland & Knight	law firm	2026-10-20	Client alert covering all five Part 450 NPRMs. It describes the containment proposal as removing a redundant and conflicting cross-reference to 450.133 and extending 450.110 to reentry vehicles. It warns that a separate 450.133 flight hazard area is still required for phases where containment is not the only strategy. It also says the 30-day comment period is short and that final rules are likely to move quickly.
FAA Proposes Regulatory Reforms to Accelerate Commercial Space Launches	AIAA	trade press	2026-10-09	Short roundup of the Payload report on the five FAA proposals. It says they aim to balance efficiency and flexibility with existing safety standards and support the federal goal of 1,000 commercial launches and reentries a year by 2030. It does not go into the containment provisions in detail.
Sean Duffy Unveils 5 FAA Rules to Streamline Space Licensing	ExecutiveGov	trade press	2026-10-08	Summary of Secretary Duffy's announcement of the five proposed FAA rules. It describes the containment proposal as defining flight hazard areas by vehicle energy without the existing flight hazard area analysis. It places the proposals within the August 2025 executive order on commercial space competition.

SOURCE	PUBLISHER	KIND	DATE	SUMMARY
DOT Proposes Changes to Part 450 Licensing Rules	Payload	trade press	2026-10-07	Trade press report on DOT's announcement of five FAA proposals, the first output of the DOT SPACE Task Force. It lists the containment change, which would let operators size hazard areas by maximum vehicle energy instead of a full probabilistic analysis. It gives background on industry complaints about Part 450 and quotes an acting deputy FAA administrator calling the proposals just the start of red-tape cutting.
DOT Proposes Five FAA Rule Changes to Streamline Part 450 Commercial Launch Licensing	SmallSat News	trade press	2026-10-08	Trade report on the DOT announcement of five Part 450 changes. It says containment operators could size hazard areas by maximum kinetic energy instead of a full probabilistic analysis. It states that comments run through November 4 and that the FAA will review feedback before finalizing.
FAA proposes five rules easing rocket launch licensing · Hugin	Hugin	news	2026-10-04	News summary of the five rules filed for the October 5 Federal Register issue. It says the containment proposal would let operators skip the separate probabilistic hazard area analysis in 450.133, which the FAA says conflicts with 450.110. It notes that the proposal also touches the Part 401 definition and that all five share a November 4 deadline.

SOURCE	PUBLISHER	KIND	DATE	SUMMARY
The FAA's Five Part 450 Proposals: Small Fixes, a 4 November Deadline and a Bigger Fight Behind Them - Space Law Journal	Space Law Journal	other	2026-10-15	Analysis of the five Part 450 proposals. It explains the conflict in 450.110 between a probabilistic hazard area and a rule that all hazards stay inside it, and it treats the containment change as a technical, narrow fix. It points out the booster-landing example and says the safety criteria are unchanged. It notes the FAA certified no significant small-entity impact, asks for savings data, and says operators may ask the FAA to extend the containment approach to other phases.
FAA Proposes Five Rule Changes to Speed Commercial Launch Licensing	Talk of Titusville	news	2026-10-07	Local news explainer on the five proposals and their effect on Space Coast operations. For containment, it says operators would define the hazard area by maximum possible energy, still have to clear it of people, and still need a validated method backed by representative data. It also covers the reentry omission fix and lists the docket numbers for commenting.

Outside coverage agrees with the record on the nature of the proposals, which law firm and trade press describe as narrow fixes to known ambiguities with the public risk criteria unchanged. It also anticipated two things the record then showed. Holland & Knight called the 30-day window short, and the trade association asked for more time. The Space Law Journal predicted that operators would ask the FAA to extend the containment logic to other requirements, and Blue Origin did.

The coverage diverges from the record on who benefits. General press framed the package as a gain for SpaceX and Blue Origin. In the docket, SpaceX requests no change to regulatory text, and the detailed requests come from Blue Origin and from smaller operators with fewer licensing staff.

The record does not show three things. The proposals allow confidential business information to be sent to the FAA contact outside the public docket, so cost or schedule data may exist that no reader of the docket can see. Meetings between operators and the FAA would appear only as contact summaries the agency says it will file. And the FAA told reporters on November 5 that it plans a broader overhaul of its licensing framework in 2027, which makes these five rules a first installment and gives filers a reason to save larger requests for later.

IMPLICATIONS AND SCENARIOS

Each judgment carries a likelihood term and band (ICD 203), a confidence and the test that settles it, and goes into the forecast log. The likelihoods are the analyst's subjective judgments from the record and the public context. They are not derived statistically from the 48 comments, and the record cannot show how the FAA will answer. ComtIQ scores each one publicly when it resolves, and a revised judgment is logged as a new entry without overwriting the original. A judgment that depends on a final rule not published by December 31, 2028, whether the proposal is withdrawn, replaced or still pending, is logged as unresolved. It stays in the log and is reported apart from the scored judgments. For S1, the core changes are these. In FAA-2026-9934, an operator using physical containment need not develop the flight hazard area under § 450.133. In FAA-2026-9935, an electronic method approved by the Administrator is added to § 413.7(a). In FAA-2026-9936, three of the six § 450.115(c) items are submitted once for the method as a whole. In FAA-2026-9940, § 450.163 gains a clearance exception for descending phases of flight. In FAA-2026-9941, "hypothetical" is removed from § 450.137(c)(6).

ID	JUDGMENT	LIKELIHOOD	CONFIDENCE	BASIS	SETTLES IT
S1	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 (80 to 95%)	Moderate	No organization opposes; the proposals carry out E.O. 14335 and none is a significant regulatory action. The judgment is a compound of five rules that share one policy driver and one office, so a single delay or withdrawal defeats it	Federal Register, final text of each section
S2	All five final rules published by June 30, 2027	Likely (55 to 80%)	Low	30-day comment periods, no extension and a stated plan for a broader overhaul in 2027; the FAA has stated no date, and internal review, clearance and new safety questions can each delay a final rule	Federal Register

ID	JUDGMENT	LIKELIHOOD	CONFIDENCE	BASIS	SETTLES IT
S3	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 (5 to 20%)	High	Blue Origin, the Commercial Space Federation and Firefly oppose adopting the alternative now, Relativity asks to keep email, and no filer supports it; LEAP is unfinished	Filing methods listed in the final text of § 413.7(a)
S4	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 (55 to 80%)	Moderate	Asked by the Federation, Inversion and Relativity; the clarification costs nothing in safety terms and matches current FAA practice as the filers describe it	Final rule and preamble; a general statement that does not mention Federal ranges or Federal entities does not count
S5	The final text of § 450.115(d)(2) contains the "significant uncertainty" limit	Roughly even (45 to 55%)	Low	Blue Origin and Relativity propose text; the FAA may prefer to leave the limit in the preamble or an advisory circular	Final text of § 450.115(d)(2)

ID	JUDGMENT	LIKELIHOOD	CONFIDENCE	BASIS	SETTLES IT
S6	The final rule in FAA-2026-9940 no longer carries two different FAA savings figures per application	Very likely (80 to 95%)	High	The conflict is in the published proposal and a filer has put it on the record	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
S7	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 (55 to 80%)	Moderate	Blue Origin and N2L ask for opposite readings, so silence would leave the ambiguity the proposal set out to remove	Final rule and preamble; an express statement on any one of the three counts
S8	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 (5 to 20%)	Low	No adverse party on the record and the § 450.101 risk criteria are unchanged. The absence of a suit against a proposal says little, since review attaches to final rules, so this judgment is to be revisited when the final texts publish	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 would change this view. A late filing by a state, a range operator or a safety organization on the overpressure or toxic hazard questions would raise the chance of text changes and push S2 out. A LEAP launch date announced before the final rule would raise S3.

RECOMMENDED ACTIONS AND DATES

READER	WHAT TO DO 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
All readers	Watch the five dockets for an extension, FAA contact summaries and the final rules

Dates: December 9, 2026, comments close on FAA-2026-9937, FAA-2026-9942 and FAA-2026-9943.

By December 9, 2026, for operators commenting on the second wave (FAA-2026-9937, flight safety limits objectives; FAA-2026-9942, conditional expected casualty exception; FAA-2026-9943, end of flight safety limits).

Three points apply to all three dockets. Compare the proposed regulatory text with the preamble line by line, and where the preamble is narrower or clearer, propose the text that codifies it. State the effect of each change on application acceptance under § 450.35(a) and on license modification under § 450.211, and ask the FAA to confirm it. Say who in the company owns each point, since the questions below divide between licensing counsel and flight safety engineering.

FAA-2026-9937 rewords § 450.108(c)(4). The FAA says conditional expected casualty should be one average that combines breakup from flight abort with outcomes of flight outside the limits of a useful mission, leaves out breakups within those limits, and is tested against the

threshold for each failure mode in each significant period of flight. Flight safety engineers should check whether the proposed text states that calculation without ambiguity, and name any scenario where the text and the preamble would give different results.

FAA-2026-9943 makes two changes to § 450.108(e). It retitles the paragraph "End of flight safety limits," and it scopes the paragraph to a phase of flight where the current text says the remainder of flight. The FAA expects operators to turn flight abort capability off in one phase and back on in a later one. Comments should give concrete examples of that alternation, say how critical vehicle parameters are validated at each transition, and keep apart two things the proposal distinguishes, not having to set flight safety limits and switching the abort system off. Both of these proposals amend § 450.108, which the flight safety analysis proposal also amends at paragraph (g)(1), so ask the FAA to coordinate the final texts, as Blue Origin did for § 450.137.

FAA-2026-9942 is different in kind. It would amend § 450.101(c)(2) so that an operator can show protection against a high consequence event in an uncontrolled atmospheric return by demonstrating sufficient breakup of the vehicle, its components and undeployed payloads. Two points decide whether it helps a given operator. The first is the new definition in § 401.7, a passive descent from orbit through natural decay with no ability to control the trajectory. The preamble uses the 70 nautical mile perigee threshold and says a propulsive lowering of perigee below it is not an uncontrolled return, so a company should establish whether its mission fits before arguing about evidence. The second is the FAA's statement that the showing would reuse the debris analysis under § 450.121 and the consequence analysis under § 450.135(b) with no additional analysis. Comments should test that claim for every component and undeployed payload and ask what validation of breakup the FAA will accept. This goes to safety evidence and not to paperwork.

Recompute the regulatory impact figures. The first wave contains one arithmetic conflict that a filer and an individual both found, and the second wave has at least one more. In FAA-2026-9937 the FAA gives $582 for the agency and $770 for the operator, which sum to $1,352, and then states savings of $1,347 per operator. The same passage gives a discounted total of $50,355 at seven percent and $48,888 at three percent, the reverse of the order discounting produces (91 FR 70821). The amounts are small. A request to reconcile them is a low-cost way to put a checkable point on the record.

File a letter written for each docket. A docket-specific letter makes each requested change easier to identify, evaluate and trace in the response to comments. The FAA has to answer significant issues however they are filed.

Plan on 30 days. Ask for an extension in the first week if one is needed, and do not rely on receiving it.

For operators that did not file in the first wave. The FAA says it will consider late comments where it can do so without expense or delay. A short letter supporting a specific request already on the record, such as the Federal range clarification or the email fallback, can still be filed.

For spaceport operators, local governments and insurers near launch sites. The scope of "existing locations" in § 450.137(c)(6) is undecided and two filers have asked for opposite readings. Anyone with an interest in whether temporary structures, vehicles and vessels are analyzed should say so before the final rule.

For all readers. Watch the five dockets for an extension or supplemental notice, for FAA contact summaries, and for the final rules. ComtIQ will issue the agency-response report when they are published.

METHOD, SOURCES AND LIMITS

Collection. Every posted comment and attachment in dockets FAA-2026-9934, FAA-2026-9935, FAA-2026-9936, FAA-2026-9940, FAA-2026-9941 was pulled through the Regulations.gov v4 API and stored with a dated snapshot; attachments were read as PDF, Word or plain text, scanned PDFs through OCR. Censuses generated up to Nov. 19, 2026.

Processing. Each docket went through the same pipeline on its own: duplicates grouped, campaigns detected within the docket, every unique text coded once. This report adds the comparison across dockets: organizations matched by name, letters matched by text.

Analysis. Each unique text was read and coded by ComtIQ's AI coding system against a codebook fixed for its docket, returning position, commenter type, themes, argument types, provisions for organizations, and the sentence each judgment rests on.

Measurement. In each docket a simple random share of the comments read directly was read a second time, blind, at a stronger reading level; all of a docket up to 100 comments. Agreement between the two readings, not accuracy against a human, on position in three values (support, oppose, other) and commenter group. Where a whole docket was read twice the rate is exact for that snapshot and carries no interval; where a share was read, intervals are Wilson intervals with the finite population correction.

DOCKET	COMMENTS READ TWICE	POSITION	COMMENTER GROUP
FAA-2026-9934	7 of 7	100% agreement (all 7 read twice)	100% agreement (all 7 read twice)
FAA-2026-9935	13 of 13	100% agreement (all 13 read twice)	100% agreement (all 13 read twice)
FAA-2026-9936	10 of 10	100% agreement (all 10 read twice)	100% agreement (all 10 read twice)
FAA-2026-9940	8 of 8	100% agreement (all 8 read twice)	100% agreement (all 8 read twice)
FAA-2026-9941	10 of 10	100% agreement (all 10 read twice)	100% agreement (all 10 read twice)

Limits. Organizations are matched across dockets by name as the coding system read it; a parent filing under a subsidiary's name counts apart. Themes, argument types and provisions are automated readings not yet measured against a second reading; they are reported as counts, not as findings, unless an analyst confirmed them. No comment is labeled as written by AI; nothing here speaks to authorship.

APPENDIX. CITED COMMENTS

COMMENT	LINK
FAA-2026-9934-0004	https://www.regulations.gov/comment/FAA-2026-9934-0004
FAA-2026-9934-0006	https://www.regulations.gov/comment/FAA-2026-9934-0006
FAA-2026-9934-0007	https://www.regulations.gov/comment/FAA-2026-9934-0007
FAA-2026-9934-0008	https://www.regulations.gov/comment/FAA-2026-9934-0008
FAA-2026-9935-0007	https://www.regulations.gov/comment/FAA-2026-9935-0007
FAA-2026-9935-0009	https://www.regulations.gov/comment/FAA-2026-9935-0009

COMMENT	LINK
FAA-2026-9935-0010	https://www.regulations.gov/comment/FAA-2026-9935-0010
FAA-2026-9935-0011	https://www.regulations.gov/comment/FAA-2026-9935-0011
FAA-2026-9935-0012	https://www.regulations.gov/comment/FAA-2026-9935-0012
FAA-2026-9935-0014	https://www.regulations.gov/comment/FAA-2026-9935-0014
FAA-2026-9936-0002	https://www.regulations.gov/comment/FAA-2026-9936-0002
FAA-2026-9936-0004	https://www.regulations.gov/comment/FAA-2026-9936-0004
FAA-2026-9936-0005	https://www.regulations.gov/comment/FAA-2026-9936-0005
FAA-2026-9936-0007	https://www.regulations.gov/comment/FAA-2026-9936-0007
FAA-2026-9936-0008	https://www.regulations.gov/comment/FAA-2026-9936-0008
FAA-2026-9936-0009	https://www.regulations.gov/comment/FAA-2026-9936-0009
FAA-2026-9936-0010	https://www.regulations.gov/comment/FAA-2026-9936-0010
FAA-2026-9936-0011	https://www.regulations.gov/comment/FAA-2026-9936-0011
FAA-2026-9940-0004	https://www.regulations.gov/comment/FAA-2026-9940-0004
FAA-2026-9940-0006	https://www.regulations.gov/comment/FAA-2026-9940-0006
FAA-2026-9940-0007	https://www.regulations.gov/comment/FAA-2026-9940-0007
FAA-2026-9940-0008	https://www.regulations.gov/comment/FAA-2026-9940-0008
FAA-2026-9940-0009	https://www.regulations.gov/comment/FAA-2026-9940-0009
FAA-2026-9941-0005	https://www.regulations.gov/comment/FAA-2026-9941-0005
FAA-2026-9941-0006	https://www.regulations.gov/comment/FAA-2026-9941-0006
FAA-2026-9941-0008	https://www.regulations.gov/comment/FAA-2026-9941-0008

COMMENT	LINK
FAA-2026-9941-0009	https://www.regulations.gov/comment/FAA-2026-9941-0009
FAA-2026-9941-0010	https://www.regulations.gov/comment/FAA-2026-9941-0010

The data behind the tables (organizations with their stance and docket, position by docket) is published with this report as CSV files.