



April 1, 2026

BY ELECTRONIC FILING

Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street, N.E.
Washington, DC 20554

Re: *Kuiper Systems, LLC, ICFS File No. SAT-MOD-20211207-00186*

Dear Ms. Dortch,

Amazon is continuing to violate its approved orbital debris mitigation plan and the express conditions in its license—dispensing satellites 50-90 km higher than authorized and without adequate coordination or information sharing. Amazon’s and its launch partner Arianespace’s negligence needlessly and significantly increases risk to other operational systems and inhabited spacecraft. To be clear, Amazon and Arianespace can easily launch in a manner that dramatically decreases this risk if they simply adjust their launch plans to bring them into compliance with Amazon’s authorization.

As part of its application for approval of its orbital debris mitigation plan, Amazon repeatedly represented to the Commission that its satellites would be inserted near 400 km altitude. For example, Amazon stated that its satellites “will be launched into an initial deployment orbit at or near 400 km” and incorporated this assumption as a significant input into various orbital debris mitigation showings required under the Commission’s rules.¹ Amazon also undertook that, “[a]fter injection at or near 400 km and successful checkout, each Kuiper Satellite will initiate collision avoidance procedures” thus “protecting previously launched space vehicles,” and promised to further mitigate the risk of collision by “coordinat[ing] during operations, in real-time, with systems through whose orbital altitudes Kuiper Satellites will transit.”²

Based on Amazon’s representations, the Commission approved Amazon’s orbital debris mitigation plan subject to several explicit license conditions, including:

1. “Amazon must coordinate physical operations of spacecraft with any operator using similar orbits, for the purpose of eliminating collision risk and minimizing operational impacts.”³
2. Amazon must, pursuant to Section 25.146(e), share ephemeris data “in a manner that is mutually acceptable,” “coordinate physical operations of spacecraft with any operator

¹ Application for Modification, ICFS File No. SAT-MOD-20211207-00186, Technical Appendix at 2-4 (Dec. 7, 2021) (“Amazon Orbital Debris Application”). *See also* Letter from Carrie Gage to Karl A. Kensinger, ICFS File No. SAT-MOD-20211207-00186, at 2 (June 17, 2022) (in response to questions from the Space Bureau, confirming that “Amazon also plans to launch its satellites into a deployment altitude at or near 400 km”).

² *Amazon Orbital Debris Application*, Technical Appendix at 12.

³ *Kuiper Systems LLC*, 38 FCC Rcd. 1112, ¶ 47 (IB 2023).

using similar orbits,” and “make available to other operators supplemental information . . . sufficient to reduce covariance of predicted trajectories to a level that facilitates collision avoidance procedures, as coordinated with other operators.”⁴

Despite its repeated representations and related license conditions, Amazon launched eight times into orbits with insertion altitudes above 450 km without submitting any amended orbital debris mitigation plan or seeking Commission approval for such a change. Most recently, even with input from SpaceX, Amazon’s February 12, 2026, launch on Ariane 6 inserted its satellites at an altitude sufficiently high that it led to unmitigable collision risks with dozens of operational spacecraft. To be clear, Amazon did not update its orbital debris mitigation plan. But more importantly, Amazon did not provide sufficiently accurate ephemerides to facilitate post-deployment deconfliction for that launch, which significantly increased the risks to all satellite operations near the 480 km insertion altitude as well as to inhabited spacecraft. Amazon’s lack of deconfliction forced Starlink satellites alone to perform 30 collision avoidance maneuvers within hours immediately following the Ariane launch to avoid the newly deployed satellites. Even in the presence of these maneuvers, the risk from this insertion is estimated to considerably exceed the Commission’s semi-annual reporting threshold of 1×10^{-5} for unmitigated conjunctions.

Amazon and Ariane unilaterally increased the insertion altitudes for the February 12, 2026, launch with full knowledge that thousands of satellites are already operating at those altitudes and that the Commission approved more to be lowered to those shells to decrease risk. Nonetheless, Amazon and Ariane still chose these high-risk insertion altitudes, which significantly increases collision risks due to known large launch trajectory uncertainties, and in this case ineffective launch collision avoidance screening by Ariane.

Amazon’s unapproved action materially altered the collision risk profile the Commission evaluated when it approved Amazon’s orbital debris mitigation plan, imposing heightened risk on all other operators and the millions of Americans who depend on space-based services. Amazon neither sought nor obtained approval for this change. Amazon must therefore swiftly ensure its launch plans comport with its authorization before it creates irreparable harm.

Sincerely,

/s/ David Goldman

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⁴ *Id.* ¶¶ 46, 47, 55.

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