



August 17, 2023

Mr. Eric Mahowald  
Mr. LaMario Cato  
United States Space Force  
150 Vandenberg Street  
Suite 1105  
Peterson SFB, CO 80914

**Re: Request for Comment on the Commercial Augmentation Space Reserve (CASR) Framework**

Dear Mr. Mahowald and Mr. Cato:

The U.S. Chamber of Commerce (“Chamber”) is pleased to respond to the Commercial Augmentation Space Reserve (“CASR”) Request for Information (“RFI”), issued by the United States Space Force, Space Systems Command Commercial Space Office. The Chamber appreciated the opportunity to participate in the recent Industry Review Session and encourages the Department of Defense (“DoD” or “Department”) to continue dedicating time and resources to articulating why this program is necessary and understanding industry capabilities and business models to speed procurement of commercial capabilities and services.

The U.S. space industry provides valuable capabilities that can be leveraged by the U.S. Government during crises ranging from disaster response to geopolitical tensions. Acting now to procure commercially available capabilities, equipment, and infrastructure from U.S. industry and integrating them into defense architectures will have a net positive impact on national security in the long-term.

To maximize the benefit of the proposed CASR program and industry participation therein, we offer the following suggested actions:

- **Explain more fully why this program is necessary.** CASR Level 1 and 2 appear to be covered under standard contractual relationships with the DoD. Please explain what is not covered by existing authorities, such as the Defense Production Act (“DPA”), that drove the Department to consider CASR and the current proposed three level framework?
- **Provide more detail to industry about the value of participation.** While the RFI refers to the success of the Civil Reserve Air Fleet (“CRAF”) program and its applicability to the CASR framework, DoD should be prepared to explain in greater detail what space industry companies can expect if they choose to participate in the program. The Chamber recommends that DoD solicit members of the CRAF program to discuss the value they have obtained through the program. The Chamber would

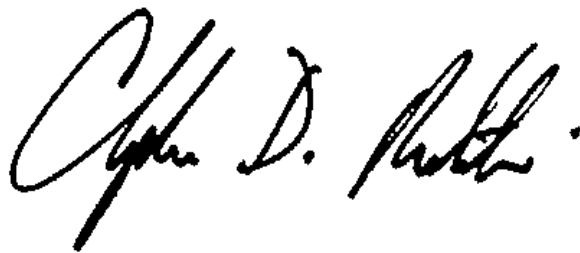
be happy to collaborate with DoD to convene a session to discuss CRAF and its relationship to CASR.

- **Expand efforts to test, vet, integrate, and utilize commercial capabilities and services** into national security architectures.
- **Be open to leveraging alternative contract mechanisms** and resources that allow the Department to procure commercial technologies, hardware and services. As the Task Force members stated at the industry session, procurement cycles must begin now so the force is prepared in the event a Level 3 CASR response is warranted.
- **Accelerate training to prepare the warfighter and national security professionals** with the ability to fully leverage commercial space capabilities and services.
- **Refine the concept of war risk insurance and liability protection** that would be available to space companies during a time of war. Companies and investors need specificity to understand how these programs supplement other insurance offerings and when a claim would be triggered. It is the Government's responsibility as part of CASR to prepare commercial space partners to provide support to the U.S. government during a crisis.

It is important for the DoD to continue to solicit and integrate feedback from industry on the CASR framework. CASR's success will be predicated on DoD "partnering to win" with industry by maintaining open communication and frequent dialog about the requirements, incentives and tradeoffs involved in this initiative.

Thank you for the opportunity to provide feedback as DoD develops this important program. We look forward to continued engagement with the Department on this initiative.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris D. Roberti". The signature is fluid and cursive, with a large initial "C" and "R".

Christopher D. Roberti  
Senior Vice President  
Cyber, Space, and National Security Policy  
U.S. Chamber of Commerce