

**FLEET**

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Senate Standing Committees of Economics  
Economics Legislation Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

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Dear Committee Members,

**SUBJECT: Submission to the Space Activities Amendment (Launches and Returns) Bill 2018**

Fleet Space Technologies thanks you for the opportunity to submit our opinions on this Bill.

Fleet is an Australian satellite telecommunications company developing and operating a constellation of microsatellites to form a global narrow-band communications network in Low Earth Orbit and allowing users to connect directly to our service via the web. In 2017 Fleet was the first Australian space technology company to receive Venture Capital backing in the form of a 'series A' investment of \$5 million, and the company currently employs about 20 people, most of whom are highly qualified engineers from the electronics, software or aerospace fields. Fleet is currently procuring from a US-based provider two nanosatellite (3U CubeSat) "buses" (approximately 5kg each) for the on-orbit demonstration of our service. Fleet has already commenced work on the design of the next generation of satellites that will be slightly larger and considerably more capable.

Fleet has already selected a US launch service broker (Spaceflight, Inc.) for the launch of our first two nanosatellites, which will fly on separate Indian and US launch vehicles. Fleet will continue to contract the launch of its future satellites to commercial launch service providers. Future launch providers could include the new microlaunchers entering the market in the near future, such as Rocket Lab and Virgin Orbit, or eventually perhaps the Australian launcher start-up Gilmour Space Technologies.

Air-launch, either overseas or from Australian territory, appears to be a commercially attractive future option and so Fleet welcomes the Bill's treatment of these scenarios.

Fleet welcomes the reduction of the maximum insurance requirement to \$100 million but we request the Space Agency to develop and follow a risk-based approach to, where warranted, further reduce this insurance requirement taking into account the specific launch, orbit and operational plans of the satellite mission.

We are convinced that the current industry trend for 'piggyback' or 'rideshare' launch services will continue to expand, and it is in the interests of Australia for its companies to be able to access such services with the minimum of time, paperwork and insurance cost. As a customer of such piggyback launch services Fleet feels that is quite unnatural to have the insurance risks related to the rocket launch lumped in with the risks of collision during deployment and on-orbit operations. We urge the Committee to clearly separate the two insurance regimes, and to not require Australian satellite operators to carry insurance for the launch phase if carried out by a well-qualified launch operator that already has adequate insurance or self-insurance provisions.

In the case of overseas launch operators, we request that the Committee and the Space Agency to look into intergovernmental agreements with the nations hosting the major commercial launch providers (USA, India, New Zealand, Russia, Europe) in order to divide up the international liabilities and corresponding insurance requirements between the launch and post deployment phases, thereby avoiding any double-insurance for launch related risks.

We note that this bill does not address the issue of continuing regulation of satellites once they are on orbit. We urge the Committee and the Space Agency to take an active interest in this area, and at the appropriate time in the future, to implement balanced legislation that protects the space environment for use by future generations whilst also providing Australian satellite operators with commercial usage rights and obligations that are comparable to those of other leading spacefaring nations.

Yours sincerely,

Flavia Tata Nardini  
CEO