To the Federal Communications Commission:

In the Matter of SpaceX – Application for Authorization of Satellite System

[SAT-LOA-20260108-00016]

PETITION TO DENY AND REQUEST FOR FULL NEPA REVIEW

Filed by: Asociación Argentina de Astronomia (AAA)

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President

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The Asociación Argentina de Astronomia (AAA), representing the professional astronomical community in Argentina, and the largest astronomical observatory in our country, Complejo Astronómico El Leoncito, respectfully submit this Petition to Deny and Request for Full Environmental Review under the National Environmental Policy Act (NEPA) concerning the proposed satellite constellation of SpaceX.

We express our serious concern regarding SpaceX's proposal **[SAT-LOA-20260108-00016]** and the implications of deploying satellite constellations at this unprecedented scale. The Low Earth Orbit and the Dark Sky is a resource of all humanity. Article 1 of UNESCO's Human rights for future generations declaration states that "persons belonging to future generations have the right to an uncontaminated and undamaged Earth, including pure skies". It has been proven through multiple peer reviewed research studies that the deployment of large numbers of satellites produces light, debris, and atmospheric contamination that threaten the scientific and industrial use of Low Earth Orbit, as well as life on the surface of the Earth.

We urge the Federal Communications Commission (FCC) to reject this proposal in its current form. While satellites play an important role today, deploying constellations at the scale proposed would dramatically expand human activity in low Earth orbit, with global environmental, scientific, and cultural consequences.

Key concerns include:

- Orbital congestion: Increasing the number of active satellites by roughly 70 times, raising the risk of collisions and cascade failures.
- Atmospheric impacts: Increased pollution from frequent launches and satellite re-entries, with long-term effects that remain poorly understood.
- Loss of the night sky: Light scattered from satellite surfaces would contribute to rising skyglow and erode humanity's view of the stars. In particular, within our field of research and development, Astronomy, the light pollution generated by this project would have a significant and measurable impact on professional astronomical work. We therefore invite the reader to consult the documentation available at the "IAU Centre for the

Protection of the Dark and Quiet Sky from Satellite Constellation Interference", which provides a comprehensive assessment of these effects (https://cps.iau.org/about/). These impacts are well documented in scientific literature and are not speculative.

- Ecosystem disruption: Further interference with natural cycles of light and darkness that wildlife and ecosystems depend on.

For these reasons, we respectfully urge the FCC to require a comprehensive environmental review of large-scale satellite deployments, consistent with the National Environmental Policy Act, and to pause approval or expansion toward million-satellite architectures until such review is completed and publicly evaluated. Innovation must advance alongside environmental responsibility. Until these risks are fully assessed through a transparent, science-based process, this proposal should not move forward.

Respectfully submitted,

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