



International Astronomical Union
Union Astronomique Internationale

98bis bd Arago, F - 75014 Paris, France ▪ www.iau.org

Willy Benz – President
email: willy.benz@unibe.ch

September 13, 2024

Innovation, Science and Economic Development Canada
Engineering, Planning and Standards Branch
Senior Director, Space Services and International
6th Floor, East Tower
235 Queen Street
Ottawa ON K1A 0H5

Re: *Canada Gazette*, Part I, June 2024, Consultation on a Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite. SMSE-006-24

To Whom It May Concern:

This comment on Innovation, Science and Economic Development Canada's (ISED) Consultation on the Policy, Licensing and Technical Framework for Supplemental Mobile Coverage by Satellite (SMCS) ("the Consultation") is provided by the International Astronomical Union (IAU).

The International Astronomical Union (IAU), founded in 1919, has today a membership of more than 12,000 professional astronomers from about 90 Countries, and can be considered representative of the world astronomical community. The IAU's mission is to promote and safeguard astronomy in all its aspects, including research, education, communication, and development, through international cooperation. Canada has been an actively contributing member since 1920.

The IAU

- Supports the comment submitted by members of the Outer Space Institute and leadership within the Canadian astronomical community,
- Shares the concerns of the above parties regarding the potentially severe impacts of SMCS systems on optical and radio astronomy,
- Emphasizes the profound positive impacts that astronomy continues to have on society as a cutting-edge science that explores and uses outer space, tests physical laws, and enables fundamental services, such as maintaining Earth's reference frame, monitoring space weather, and searching for asteroidal and cometary Earth impactors,
- Recalls the tremendous investments into national and international astronomical facilities throughout the world, including those supported by Canada,
- Acknowledges that satellite systems can simultaneously have positive and negative global impacts,
- Emphasizes that under the Outer Space Treaty there are international obligations for States Parties to show due regard to the corresponding interests of other States in the peaceful exploration and use of outer space,
- Further emphasizes the obligations under the Outer Space Treaty to conduct international consultations whenever there is reason to believe that an activity or experiment could cause harmful interference with the activities of other States Parties in the peaceful exploration and use of outer space,



International Astronomical Union
Union Astronomique Internationale

98bis bd Arago, F - 75014 Paris, France ▪ www.iau.org

Willy Benz – President
email: willy.benz@unibe.ch

And therefore urges ISED, in its licensing process, to

- Include protections for optical and radio astronomy,
- Require coordination between satellite operators and observatories, as well as the National Research Council Canada,
- Ensure meaningful coordination takes place once established and to encourage operators to share solutions and best practices developed in this coordination,
- Seriously consider the global impacts of satellite systems.

Respectfully,

Willy Benz
IAU President

Executive Committee

Officers:

Prof. Willy Benz, President (Switzerland)
Prof. Diana Worrall, General Secretary (United Kingdom)
Prof. Brian Schmidt, President-Elect (Australia)
Prof. Laura Ferrarese, Assistant General Secretary (Canada)
Advisor:
Prof. Debra Elmegreen, Past President (United States)

Vice Presidents:

Prof. Hyesung Kang (Rep. of Korea)
Prof. Solomon Tessema (Ethiopia)
Prof. Ilya Usoskin (Finland)
Prof. James Chibueze (South Africa)
Prof. Monica Rubio (Chile)
Prof. Grazina Tautvaišienė (Lithuania)