FCC ANNOUNCES WIDE-RANGING NEW CONTROLS ON DRONES AND DRONE COMPONENTS

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US Policy and Regulatory Alert

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On 22 December 2025, the Federal Communications Commission (FCC) announced a significant expansion of its national-security controls on unmanned aircraft systems (UAS), commonly referred to as drones. The FCC added all foreign-produced UAS and UAS “critical components” to the FCC's Covered List, effectively barring most new foreign-made drones and key components from obtaining FCC equipment authorizations required for sale and operation in the United States. There are two limited exceptions.

This action—implemented by the FCC's Public Safety and Homeland Security Bureau—creates a new regulatory barrier for many UAS manufacturers, developers, and importers, with immediate and medium-term implications for product design, supply chains, and US market access.

OVERVIEW OF THE FCC ACTION

The FCC's decision implements a 2025 National Defense Authorization Act (NDAA) mandate and reflects an executive branch national-security determination. In practice, it functions as a sector-specific restriction that conditions access to the US market on where a drone or its critical components are produced and whether they meet emerging federal security frameworks.

The core elements of the action are the following:

FCC Covered List Expansion

All foreign-produced UAS and UAS critical components are now included on the FCC's Covered List.

Prospective Restriction

Covered equipment is ineligible for new or modified FCC equipment authorizations, which are generally required for wireless devices sold in the United States.

Existing Authorizations Preserved

Foreign-produced UAS and components that received FCC authorization before 22 December 2025 may continue to be imported, marketed, and operated—so long as they are not modified in a way that would require a new or updated authorization.

Separately, under related FCC rule changes that took effect on 26 December 2025, the FCC also gained authority—after public notice and comment—to limit or revoke even previously granted authorizations for FCC

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Covered List equipment. While that authority was not exercised in the UAS action itself, it represents an additional compliance risk over time.

KEY DATES AND PLANNING HORIZONS

For manufacturers and importers, the most important date is 22 December 2025 due to the following:

- Foreign-produced UAS and critical components authorized before that date may remain on the US market.
- New foreign-produced models, or material changes to existing models that require a new or modified FCC authorization, are effectively blocked as of that date unless an exemption applies.

The FCC has also recognized the following temporary exemptions that materially affect planning, which may continue to seek FCC equipment authorizations through 1 January 2027:

- Certain UAS platforms on the US Department of Defense (DoD) Blue UAS lists.
- UAS critical components that qualify as domestic end products under federal “Buy American” rules.

These exemptions automatically sunset on that date unless extended or replaced by a new determination, creating a limited window for qualifying products to enter or remain in the US market.

BLUE UAS DESIGNATION

“Blue UAS” is a DoD initiative led by the Defense Innovation Unit (DIU) that identifies secure, NDAA-compliant UAS platforms and components suitable for US government use. The program includes the following:

- The Blue UAS Cleared List, which identifies fully-vetted UAS platforms.
- The Blue UAS Framework, which identifies vetted components, modules, and software that may be used in compliant systems.

To achieve Blue UAS status, a platform or component must undergo formal DoD vetting and typically must meet the following criteria:

- Be sponsored by a DoD user with an operational or training need.
- Provide capabilities not adequately addressed by existing Blue UAS platforms.
- Comply with NDAA supply-chain restrictions (including prohibitions on covered foreign adversary suppliers).
- Pass extensive cybersecurity and supply-chain integrity reviews.

Recent updates have also created a more structured pathway from the non-DoD Green UAS program to Blue UAS designation. Platforms certified under Green UAS—demonstrating cybersecurity, supply-chain integrity, and operational safety—may now be eligible for inclusion on the Blue UAS Cleared List without a full bespoke DIU review, though DoD oversight and additional checks still apply. As a result, commercial manufacturers should to plan for both Green UAS-aligned assessments and DoD-specific sponsorship requirements.

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BUY AMERICAN "DOMESTIC END PRODUCT" EXEMPTION

In addition to Blue UAS platforms, the FCC announced a temporary exemption for UAS critical components that qualify as "domestic end products" under "Buy American" standards, which require products to be manufactured in the United States and either meet minimum US content requirements (currently at least 65%) or qualify as commercially available off-the-shelf items. This exemption expires on 1 January 2027, unless renewed.

Importantly, there is no blanket brand-wide exemption. Only the following qualify for temporary relief:

- Specific models listed on the Blue UAS Cleared List.
- Individual components that independently meet the domestic end product definition.

Foreign-produced UAS and components that do not fall into one of these categories—including many high-volume Chinese-produced platforms—remain ineligible for new FCC authorizations.

IMMEDIATE COMPLIANCE STEPS FOR IMPORTERS

Importers and distributors should take prompt action to assess exposure under the new rules. Key steps include the following:

Authorization verification

Confirm that each UAS and UAS critical component has a valid FCC equipment authorization issued before 22 December 2025 or qualifies for an applicable exemption.

Change Management

Ensure that no design, performance, or frequency changes have been made that would require a new or modified FCC authorization.

Supply-Chain Diligence

Obtain updated representations from manufacturers regarding production location, bill of materials, and FCC Covered List status of components.

List Monitoring

Regularly cross-check products against the FCC Covered List, Blue UAS lists, and applicable "Buy American" criteria as these frameworks continue to evolve.

Given the scope and novelty of the FCC's action, companies involved in designing, manufacturing, importing, or integrating UAS should reassess US market strategies and compliance controls to address both near-term authorization constraints and longer-term national security risks.

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