FCC ADDS FOREIGN-PRODUCED ADVANCED ROBOTIC DEVICES TO THE COVERED LIST: FIVE THINGS TO KNOW

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On 28 July 2026, the Federal Communications Commission's (FCC) Public Safety and Homeland Security Bureau released Public Notice DA 26-786, adding foreign-produced advanced robotic devices and, separately, foreign-produced power inverters to the FCC's Covered List (the list of communications equipment and services that the FCC has determined pose an unacceptable risk to US national security, maintained pursuant to the Secure and Trusted Communications Networks Act of 2019)—and, as the points below show, it is not the last word on the subject either. The robotics listing bars new foreign-produced humanoid, quadruped, and other mobile robot models from the equipment authorization required to import, market, or sell them in the United States. It is best understood as part of the same accelerating campaign that produced the power inverter listing, not a standalone action.

Beyond the topline news, five points deserve particular attention for compliance planning. One is easy to miss because the FCC confirmed it only in supplementary guidance: the listing reaches ordinary consumer products like robot vacuums and lawn mowers. The other points go to the scale of what the FCC itself says is on the line. The agency's supporting National Security Determination (the interagency national security determination transmitted to the FCC recommending addition of foreign-produced advanced robotic devices to the Covered List) describes advanced robotics as critical to US defense, homeland security, and reindustrialization, and backs that assessment with concrete evidence of security failures already observed in the field—most notably an incident in which a remote actor accessed thousands of foreign-produced robots (reportedly as many as 7,000) operating inside American homes.

"ADVANCED ROBOTIC DEVICE" IS A PRECISELY ENGINEERED DEFINITION—AND THE EXCLUSIONS MATTER AS MUCH AS THE COVERAGE

The National Security Determination defines a covered device conjunctively and in unusual detail: it must be a mechanical mobile device—including autonomous mobile robots, humanoid robots, and quadrupeds—capable of locomotion, obstacle avoidance, navigation, or ground movement; operating at a distance from a human operator based on commands or sensor data; weighing more than 4.4 pounds (together with any ground or docking station); and containing all three of a sensor capable of perceiving its environment, a component providing wired or wireless network connectivity at speeds of at least 200 kbps in either direction (including Bluetooth/Wi-Fi, cellular, or satellite), and software—local or remote, including firmware and artificial intelligence or machine-

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learning model weights—controlling the robot's autonomous navigation, perception, data collection, or remote command-and-control.

Just as significant is what the definition expressly carves out: connected vehicles (regardless of weight), rail-only vehicles, uncrewed aircraft, unmanned underwater vehicles, Food and Drug Administration-regulated medical devices (including surgical robots and mobility aids), and fixed, stationary industrial or medical robots such as articulating or Selective Compliance Assembly Robot Arms. A foreign-produced product that looks superficially similar to a covered device—a warehouse automated guided vehicle, a surgical robot, a stationary cobot—may sit entirely outside the listing depending on which box it checks. Given the complexity of the definition, the first diligence step is to run the full definition against a specific product line, starting with the connectivity and weight thresholds addressed next.

THE THRESHOLDS ARE MORE RESTRICTIVE THAN THE INVERTER LISTING'S—AND REACH FAMILIAR CONSUMER PRODUCTS

The robotics definition's connectivity and weight thresholds are more specific than the power inverter listing issued the same day, which imposes no weight threshold and no throughput floor—a precision that forecloses easy arguments for hardwired robots but also creates a genuine, testable question for small or lightweight devices. That specificity matters because the definition reaches further than the words “advanced robotic device” suggest: the FCC has confirmed in its published FAQ that the listing covers familiar consumer products, not just industrial or defense equipment—robot vacuums and robot lawn mowers are included if they meet the definition. Companies whose only “robotics” exposure is a consumer product line should not assume this listing does not apply to them.

THE DETERMINATION LEANS HEAVILY ON DOCUMENTED INCIDENTS, NOT JUST THEORETICAL RISK

Unlike a purely prospective risk finding, the National Security Determination cites specific, dated security incidents involving foreign-produced robots already in the field. It references a vulnerability discovered in early 2026 that allowed remote actors to access thousands of consumer robots inside homes worldwide, including live camera feeds, microphone audio, and detailed home maps; a September 2025 exploit—publicly reported as affecting fleets of Unitree robots—that let an attacker take over the robot and scan for others nearby, raising the prospect of a self-propagating “humanoid botnet”; and an April 2025 report identifying a potentially pre-installed backdoor in foreign-produced robotic quadrupeds giving remote camera access and full control. These are treated as evidence supporting the listing, not hypotheticals, which is useful context for clients assessing how the FCC and reviewing agencies are likely to weigh a Conditional Approval (a case-by-case exemption from the Covered List that only the Department of War may grant for a specific device or class) application, and how skeptically they may view assurances about a specific product's security architecture.

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THERE ARE TWO WAYS FOR NEW ROBOTS TO REACH THE US MARKET—AND EXISTING PRODUCTS GET ONLY LIMITED BREATHING ROOM

Three distinct mechanisms determine whether a robot can enter, or stay in, the US market despite the listing: a case-by-case Conditional Approval, the across-the-board "domestic end product" exemption, and the narrower protection that already-authorized products retain by default.

A Conditional Approval exempts a specific device or class from the robotics listing—but only the Department of War (DoW) may grant it, unlike the shared DoW/Department of Homeland Security authority over power inverters—and the underlying determination frames the process as helping producers "while they work to onshore manufacturing and address the US government's national security concerns," pointing toward a manufacturing-commitment framework rather than a pure technical security audit. The alternative path is the "domestic end product" exemption: per the FCC's published FAQ, a device qualifies—and so falls outside the Covered List entirely—only if US-made components exceed 65% of the device's total value today, a threshold rising to 70% in 2029. This is a bright-line number companies can model against a bill of materials now before the bar moves.

Neither path matters for a fielded product that needs no exemption at all: being added to the Covered List does not retroactively strip existing equipment authorizations, and previously authorized foreign-produced robots may continue to be produced, marketed, imported, and used unless the FCC acts further. But that breathing room is narrow. The FCC's Office of Engineering and Technology has issued a blanket waiver permitting only certain Class I and Class II software and firmware permissive changes (the FCC's categories of minor modifications to previously authorized equipment that do not require a new equipment authorization) to already-authorized robots through at least a multiyear window, while hardware changes remain off limits absent a separate waiver, a distinction companies with fielded fleets should build into product update and replacement planning.

THIS LISTING IS PART OF A BROADER, ACCELERATING COMPLIANCE CAMPAIGN—NOT A ONE-OFF ACTION

The robotics and power inverter listings were issued together, by the same interagency body, on the same day, and both sit inside a wider pattern: the FCC has taken several Covered List and related supply-chain actions in rapid succession over the past eight months, each following a national security determination transmitted by a White House-convened interagency panel.

Days before this listing, on 22 July 2026, the FCC adopted a Third Report and Order closing the "component part loophole"—prohibiting authorization of devices that incorporate a logic-bearing hardware component produced by a Covered List entity—and imposing new FCC ID display obligations on online marketplaces. That prohibition takes effect 30 days after Federal Register publication and reaches new applications only, with pending applications exempt unless later amended to add or change such a component. The Third Further Notice of Proposed Rulemaking issued alongside it goes further still, proposing hardware and software bill-of-materials disclosures, expanded full-certification requirements for Covered List sectors that today enjoy streamlined pathways, and a cut to the research and development (R&D) import allowance for foreign-produced robots from 4,000 units to just 40—changes significant enough that companies relying on Suppliers Declaration of Conformity-

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eligible treatment or on R&D import exceptions should assess their exposure and consider commenting while the proposal remains open.

None of this is peripheral: the FCC's own Fiscal Year 2027 Agency Performance Plan elevates “Promote National Security and Public Safety” to one of only four agency-wide strategic goals and names robotics and autonomous systems specifically as a technology area where the FCC's new Council on National Security intends to “ensure the US wins the strategic competition with China.” Companies with any exposure to robotics, automation, or broader FCC-regulated connected hardware should treat this listing as the first step in an evolving, well-resourced program, not a single event.

WHY THIS MATTERS

This listing carries immediate, concrete consequences for product planning, supplier diligence, and contract risk allocation across the full chain of manufacturers, importers, and buyers of connected robotic devices—and, as the points above show, for a wider range of FCC-regulated hardware than one might initially expect. The definition's precise scope, the exclusions that may take a given product out of the listing entirely, and the practical mechanics of the DoW's Conditional Approval process are all more intricate than a summary review of the action would suggest.

We are tracking this docket closely, including the definitional questions, the Conditional Approval guidance as it develops, and any further Covered List expansions, including the pending R&D import allowance cut discussed above. Companies that anticipate needing a Conditional Approval should move quickly: application backlogs have followed past Covered List expansions, and delay can mean losing the ability to market or update a product for months. If you have foreign-produced connected robotics (or other connected hardware) in your supply chain, product roadmap, or customer base, we would welcome the opportunity to run a bill-of-materials gap assessment against the 65%/70% domestic end product threshold, evaluate your readiness for a Conditional Approval filing, or help you think through R&D import compliance or comments on the pending rulemaking.

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