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FCC Bans Import of Foreign Drones and Critical Components

On Dec. 22, 2025, the Federal Communications Commission (FCC) expanded its Covered List, effectively implementing a sweeping ban on the import of new models of drones and critical components produced outside of the United States. The action has a broad scope and applies to all foreign drones and critical components, regardless of country of origin and who seeks to procure them. The FCC subsequently provided clarification on Jan. 7 and 21 regarding the scope of its December decision.

Background

The FCC maintains a list of equipment and services that it has determined "pose an unacceptable risk to the national security of the United States or the security and safety of United States persons," which it calls the "Covered List." Once on the Covered List, equipment cannot receive authorizations from the FCC, and, as such, cannot be imported into the United States.

The FCC's decision to add all foreign drones and critical components to the Covered List – not just those from traditional adversary countries like China – surprised most industry stakeholders. Many remain skeptical that the purported security risks of drones and critical components from non-adversarial nations are on par with those of other technology on the Covered List, such as certain telecom equipment from China and cybersecurity software from Russia. Unlike prior restrictions focused on federal government procurement, these new rules affect operations across a broad swath of domains, including public, commercial, and hobbyist.

Provisions of the Ban

- **Grandfathered Models:** Drones and critical components that had received FCC clearance prior to Dec. 22, 2025, remain eligible for import. Stakeholders may continue to use and purchase these specific models.
- **Critical Components:** "Critical components" include data transmission devices, communications systems, flight controllers, ground control stations and unmanned aircraft systems (UAS) controllers, navigation systems, sensors and cameras, batteries and battery management systems, and motors. These restrictions only apply to components "designed and intended primarily for use in UAS." For example, a general-purpose camera may not be restricted, but a camera designed specifically for drones would be covered by the ban.
- **Exemptions and Exclusions:** The FCC has indicated stakeholders may be able to apply for individual exemptions, though the agency has yet to release details on the application process and qualifying criteria.
- **Temporary Exclusions:** The FCC ban excludes three categories, at least through the end of 2026:
  - Drones on the Blue UAS Cleared List and critical components on the Blue UAS Framework;
  - Drones and critical components that meet the "domestic end product" standard under the Buy American Act — i.e., those both manufactured in the United States and comprised of at least 65% U.S.-made components by cost; and
  - Software updates for already authorized drones and critical components.

Practical Considerations

The breadth of the FCC's action means that all organizations and individuals — whether operating drones commercially, for public sector purposes, or as hobbyists — may wish to assess their current and planned drone fleets and supply chains. In particular, companies should consider:

- Reviewing inventories for compliance with the grandfathering provisions;
- Evaluating sourcing and procurement strategies in light of import restrictions on new models;
- Monitoring forthcoming FCC guidance regarding the exemption process and any changes to the list of excluded products and components; and
- Engaging with trade associations or legal counsel to help shape the rules' implementation and seek clarification on ambiguous elements.

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