Annex A: Guidance on Submissions for Conditional Approval for *Foreign-Produced Power Inverters* Subject to the FCC's Covered List

July 27, 2026

Background

On July 27, 2026, the FCC updated the Covered List to include "foreign-produced power inverters" which resulted in such "covered" equipment being prohibited from receiving an equipment authorization from the FCC unless the Department of War (DoW) or Department of Homeland Security (DHS) makes a specific determination to the FCC that a given power inverter device or class of power inverters (e.g., inverter produced by a specified entity) do not pose unacceptable risks to the national security of the United States or to the safety and security of U.S. persons. This document provides guidance for producers of power inverter devices covered by this action to apply for a Conditional Approval, through an individualized assessment of "unacceptable risks" that would exempt the approved entity from restrictions imposed by inclusion on the FCC's Covered List. To be considered for Conditional Approval from DoW or DHS, power inverter producers must submit the information requested in this document in a machine-readable PDF. This information will enable DoW and DHS to assess national security risks, supply chain resilience, and the applicant's commitment to establishing trusted manufacturing capacity in the United States to ultimately judge whether the power inverter producer poses "unacceptable risks." Submission does not guarantee approval. DoW and DHS may request additional information as necessary. All decisions are final and can only be adjusted at the discretion of DoW and DHS.

Information Requested

Any entity that is seeking a Conditional Approval must provide the information requested in this document in a machine-readable PDF. Failure to provide all the requested information may result in delays or denial of the application. Submissions must include a certification by an authorized corporate officer that all the information is complete, accurate and that any material change will be promptly disclosed. Applicants that knowingly violate the terms of the Conditional Approval or materially misrepresent information provided to the U.S. Government will have their Conditional Approval terminated (if granted) and will be precluded from applying again. Applicants must submit Conditional Approval applications by January 1, 2028.

Corporate Structure:

a. Legal name, jurisdiction(s) of incorporation, and principal place of business;
b. Complete ownership structure, including parents, subsidiaries, affiliates, and joint ventures;
c. Beneficial owners holding five percent or greater equity;
d. Board members and executive leadership, including nationality and country of residence; and
e. Any foreign government ownership, control, influence, financing, or material support (applicants must identify any arrangements that allow foreign persons or governments to influence operations, decision-making, or access to technology.)

2. **Manufacturing and Supply Chain Disclosure:**
    a. A detailed bill of materials for the power inverter device for which the applicant is seeking the Conditional Approval;
    b. Country of origin for all components in the inverter and country of origin for the design of the inverter;
    c. Entities responsible for IP ownership and software updates for the inverter device;
    d. Justification on why any foreign inverter is not currently manufactured in the United States, including why these foreign sources were selected and whether alternatives exist;
    e. Locations of manufacturing, final assembly, and testing for the inverter for which the applicant is seeking the Conditional Approval;
    f. Country of origin for any onboard software and firmware;
    g. Quantitative assessment of supply chain concentration by country, expressed as both a percentage of total value and production volume; and
    h. Identification of any single points of failure in the supply chain for the inverter including sole source suppliers, the country of those sole-source suppliers, and a description of contingency plans if those suppliers become unavailable.

3. **U.S. Manufacturing and Onshoring Plan**
    a. A detailed, time-bound plan to establish or expand manufacturing in the United States for the power inverter device for which the applicant is seeking Conditional Approval in order for that device to qualify for FCC authorization;
    b. A dedicated point of contact or office responsible for implementing and overseeing the U.S. manufacturing and onshoring plan. This individual or office must provide the agency issuing the Conditional Approval an update on the status of their onshoring plan once a quarter;
    c. A description of existing U.S.-based manufacturing and assembly for the inverter including: percentage of components assembled in the United States and current U.S. headcount and facilities (locations, functions, etc.);
    d. A description of committed and planned capital expenditures, financing, or other investments dedicated to U.S.-based manufacturing and assembly over the next 1-5 years, including expected timelines and milestones;
        i. Additional number of employees expected to be hired;
        ii. Expected expansion of domestic manufacturing facilities in square feet; and
        iii. Planned investments into expanded U.S. manufacturing; and
    e. An inventory of the progress made on the U.S. manufacturing and onshoring plans submitted for all previous covered approvals, if applying for an extension of an existing Conditional Approval or if the applicant has any other existing covered Conditional Approval.

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For questions regarding FCC’s Covered List please contact Chris Smeenk (chris.smeenk@fcc.gov).

For entities seeking Conditional Approval please submit information in a machine-readable PDF to: Conditional-approvals@fcc.gov