

**FCC 針對外國製無人機系統及其關鍵零組件
申請條件式核准之指引文件
中文摘譯要點及常見問答**

一、應備文件：

(一) 企業結構，包含：

1. 法定名稱、設立司法管轄區及主要營業地；
2. 完整之所有權結構，包括母公司、子公司、關係企業及合資企業；
3. 持有 5% 以上股權之實質受益人；
4. 董事會成員及高階管理層，包括其國籍及居住國；以及
5. 說明任何外國政府之所有權、控制、影響、資助或實質支持（申請人須說明任何允許外國人或外國政府影響營運、決策或取得技術之規畫）。

(二) 製造與供應鏈揭露，包含：

1. UAS 及其關鍵零組件之詳細物料清單（bill of materials）；
2. UAS 及其關鍵零組件中所有零組件之原產國；
3. 說明任何外國製造之 UAS 或其關鍵零組件目前未於美國生產之理由，包括為何選擇該等外國來源及是否存在替代方案；
4. 該 UAS 或其關鍵零組件中美國來源零組件之成本占比；
5. 該 UAS 或其關鍵零組件之製造、最終組裝及測試地點；
6. 任何內建軟體及韌體之原產國；
7. 以國家別量化評估供應鏈集中度，並以總價值及生產量之百分比表示；以及
8. 指明該 UAS 或其關鍵零組件供應鏈中任何單點故障風險，包括單一來源供應商、該等供應商所在國，以及在該等供應商無法供應時之應變計畫。

(三)美國製造與本土化計畫，包含：

1. 詳細並具明確時間表之計畫；
2. 指定專責聯絡人或單位，負責執行與監督美國製造與回流計畫。該人員或單位須每季提供計畫進度更新；
3. 說明該 UAS 或其關鍵零組件目前於美國之製造與組裝情形，包括：在美國組裝之零組件比例，以及目前美國員工人數與設施（地點、功能等）；
4. 說明未來 1 至 5 年間，專用於美國製造與組裝之已承諾及規劃中資本支出、融資或其他投資，包括預期時程與里程碑；以及
5. 若申請延長既有之條件式核准，或申請人目前持有其他相關之條件式核准申請，須列出過往所有相關申請之美國製造與回流計畫進展。

二、注意事項：

- (一) 未提供指引文件所要求文件可能導致申請延誤或不准。
- (二) 申請時必須包含由公司授權主管簽署聲明，保證資訊完整且正確，且若有任何重大變更須立即揭露。
- (三) 任何誤導或違反條款之行為將導致核准終止，並永久禁止再次申請。
- (四) 條件式核准之獲准期間最長為 12 個月。

三、常見問題集之重要問答

(一) 是否可以為商展而進口涵蓋清單之無人機？

是，可進口有限數量用於產業商展，惟該等無人機不得用於販賣或銷售。

(二) 涵蓋清單之無人機是否可進行軟體與韌體更新？

是，根據豁免規定，該等無人機可持續進行軟體與韌體更新。

(三)條件式核准具到期日，假若核准於本年 12 月 31 日到期，是否表示相關設備於該日期之後即不得再銷售？

否，條件式核准屆期後，相關設備將無法取得 FCC 之射頻設備認證，惟若該等設備已於條件式核准期間內取得射頻設備認證，則於該日期後之進口、行銷或銷售不受限制。

(四)FCC 將持續更新 UAS 及其關鍵零組件列入涵蓋清單之常見問題集，請參連結如次：

<https://www.fcc.gov/covered-list-faqs-uas-and-uas-critical-components>

Guidance on Submissions for Conditional Approval for *Uncrewed Aircraft Systems (UAS)* and *UAS Critical Components Produced in Foreign Countries* Subject to the FCC's Covered List

January 7, 2026

Background

On December 22, 2025, the FCC [updated](#) the Covered List to include “UAS and UAS critical components produced in a foreign country,” which has resulted in such “covered” equipment being prohibited from receiving an equipment authorization from the FCC unless the FCC receives “a further specific determination from the Department of War (DoW) or the Department of Homeland Security (DHS) that a given UAS, class of UAS, or UAS critical component does not pose unacceptable risks to the national security of the United States or to the safety and security of U.S. persons.” Today, DoW and DHS are announcing guidance for UAS and UAS critical component producers 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, UAS and UAS critical component producers must submit the information requested in this document. 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 UAS or UAS critical component at issue 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 not covered under the determination issued by [DoW \(Blue UAS/Buy America\)](#) that is seeking a Conditional Approval must provide the information requested in this document. 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. Conditional Approvals will be granted for periods of up to 12 months.

1. 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 UAS or UAS critical components for which the applicant is seeking the Conditional Approval;
- b. Country of origin for all components in a UAS or the UAS critical components;
- c. Justification on why any foreign manufactured critical components or UAS are not currently manufactured in the United States, including why these foreign sources were selected and whether alternatives exist;
- d. Cost of U.S. sourced components as a percentage of the overall cost of the UAS or UAS critical component;
- e. Locations of manufacturing, final assembly, and testing for the UAS or UAS critical components 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 UAS or UAS critical components, 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 UAS or UAS critical components 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 UAS or UAS critical components, including: percentage of UAS critical components currently manufactured in the United States; percentage of models and 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; 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 contact drones@fcc.gov

目前獲條件式核准之無人機系統清單(2026年6月4日更新)

條件式核准之無人機系統	條件式核准期限
SiFly Aviation 公司之 Q12無人機系統	2026年3月17日至 2026年12月31日
Mobilicom 公司之 SkyHopper 系列/M 頻段/戰術數據連結、多款控制器及 ICE、OS3安全軟體	2026年3月17日至 2026年12月31日
ScoutDI 公司之 Scout 137無人機系統	2026年3月17日至 2026年12月31日
Verge 公司之 X1無人機系統	2026年3月17日至 2026年12月31日
Sees.ai 公司之 v.USA. 1.0無人機系統	2026年4月14日至 2026年12月31日
Air6 System 公司之 AIR8中型升降機、AIR8 Compact、AIR4 Rugged、AIR4 Light、AIR4 Micro、AIR4 Nano E 及 AIR4 Nano 無人機系統	2026年5月6日至2026 年12月31日
Elevon Aerial 公司之 Z30、Z50及 Z80無人機系統	2026年5月15日至 2026年12月31日
Blueflite 公司之 Cobalt 461無人機系統及其相關關鍵零組件	2026年5月26日至 2026年12月31日
Verity AG 公司之第4系列室內自主庫存系統之無人機系統	2026年5月26日至 2026年12月31日
Air VEV 公司之120C 及060C 無人機系統	2026年5月26日至 2026年12月31日
Innovation First International 公司之 VEX AIR 無人機系統	2026年6月4日至2026 年12月31日