

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Protecting Against National Security Threats to the Communications Supply Chain
through the Equipment Authorization Program

ET Docket No. 21-232

REPLY COMMENTS OF GATEWELL GROUP LLC

Filed in reply to comments on the Third Further Notice of Proposed Rulemaking, FCC 26-50, published at 91 Fed. Reg. 51139 (Aug. 7, 2026). Reply comments are due on or before September 28, 2026. Order, ET Docket No. 21-232, DA 26-888, ¶ 7 (OET Aug. 26, 2026).

I. Introduction, Interest, and Scope

Gatewell Group LLC filed comments in this proceeding dated August 20, 2026 (ECFS 26110072507). Those comments addressed one subject: what the documents proposed in § 2.911(d)(8) through (d)(11) must contain in order to be probative. This reply stays on that subject. Gatewell takes no position on importation thresholds, term limits, marketplace obligations, database modernization, or whether the disclosures should be required at all, filed with each application, or retained and produced on request.

Gatewell's interest is commercial and is stated here in full. Gatewell advises buyers and manufacturers on Covered List exposure and origin evidence. It publishes the Gatewell Protocol for Origin Evidence, an open documentation standard for the evidence file behind a not-covered certification, and it sells services assembling and verifying files under that standard. The text is licensed for reuse under the Creative Commons Attribution 4.0 license. Version 1.0 is a public comment draft, open for comment through October 31, 2026. The current text, Revision 3 of September 17, 2026, is Attachment A and is published at gatewellgroup.com/protocol/v1.0.

Gatewell does not ask the Commission to adopt, reference, or endorse the attached standard, and nothing recommended below would require an applicant to retain Gatewell or any other third party. The confirmation step discussed in Section III is performed by the reviewer the Commission already designates. The attachment is in the record for a narrower purpose. Many opening comments ask for some form of reliance on supplier statements. No commenter specifies the content of the supplier-side instrument: what the request asks, what the answer states, who signs it, how old it may be, and who may confirm it. The attachment shows that each of those elements can be written down.

II. A Reliance Provision Needs Stated Documentary Content

Commenters divide on whether the proposed disclosures should be required. The Foundation for Defense of Democracies supports them as proposed. FDD Comments at 5. Others oppose a filing mandate or would replace it with retention. Gatewell takes no side in that dispute. Its concern is a point on which commenters across that divide describe the same defect. Proposed § 2.911(d)(9)(iii) would require the HBOM and SBOM to be "certified as true and correct by an authorized representative of the applicant," and much of what is to be certified sits with suppliers the applicant cannot compel.

Geoffrey Irving, writing for the Carnegie Endowment for International Peace, proposes a supplier-attestation safe harbor: "The Commission should allow for a responsible party which requests the necessary information from its supplier in writing, documents the request and the response, and discloses the resulting gap has satisfied the rule as to that component. Absent such a provision, the rule would require certification as 'true and correct' of information the responsible party has no lawful means of obtaining." Comments of Geoffrey Irving, Carnegie Endowment for International Peace, at 8 (Aug. 13, 2026) (Carnegie Comments).

USTelecom states that "[a] rule that provides no safe harbor for good-faith reliance on supplier representations will generate duplicative audits and still may not improve the accuracy of the information available to the Commission." USTelecom Comments at 11. The China Chamber of Commerce for Import and Export of Machinery and Electronic Products offers redline text under which an applicant certifies "after conducting a reasonable inquiry," may rely "in good faith on information provided by an independent

supplier," and may enter the country of production as "'Unknown,' with a brief explanation of the reasonable investigative measures taken." CCCME Comments at 29-31 (proposed § 2.911(d)(9)(iii) and (d)(10)).

Gatewell agrees that a final rule requiring these certifications needs a reliance provision. An applicant cannot certify on personal knowledge a fact that exists only in a supplier's records. The question for documentary method is what the provision requires the applicant to hold.

"Reasonable inquiry" and "good faith" are standards of conduct. They do not say what a request must ask, what a supplier's answer must state, who must sign it, how old it may be, or whether anyone may check it. Carnegie's formulation names three documents: the written request, the response, and the disclosed gap. PolkaSpots Limited, which discloses that it develops a supplier attestation platform and would participate in that market, asks the Commission to "specify the required attributes and signature requirements" for producer attestations. PolkaSpots Comments at 1-2. Neither states the content of the supplier's declaration itself. A safe harbor defined by a conduct standard alone would reproduce, one tier down, the condition the Commission describes at paragraph 140, a certification whose basis the record does not capture. It would also leave Telecommunication Certification Bodies where the TIC Council says they are, with "few practical ways to determine, from the face of the document, whether a given component traces back to a Covered List entity or prohibition." TIC Council Comments at 2.

Gatewell's opening comments made the related point about the rebuttable presumption at paragraph 149, that an absence showing can be graded only against a defined search. Comments of Gatewell Group LLC § V. A reliance safe harbor is the same problem seen from the applicant's side.

Recommendation. If the Commission adopts a reliance provision, the rule text should condition it on documents with stated minimum content, along the lines Carnegie proposes:

1. *A written request* to the supplier that identifies the component by manufacturer part number and states the facts requested: the producer's legal name, and the site or sites, by country, where the component is produced.

2. *A signed supplier declaration* that identifies the declaring entity and its country, the part numbers covered, the production site or sites by name, city, and country, the site operator if it is not the declarant, and a contact for confirmation, and that is signed and dated with the signatory's name and title.

3. *A stated maximum age.* A declaration older than the stated period at the application date does not support the safe harbor. The attached standard uses twelve months for declarations on the components it requires to be traced to the supplier, measured to the revision date of the evidence file. Measuring to the application date is the adaptation proposed here.

4. *A gap record.* Where the supplier declines or cannot answer, the applicant retains the request and the response, or a record that none was received, and reports the fact as undetermined with that record. This is Carnegie's "discloses the resulting gap" and CCCME's "Unknown" with an explanation, stated as a document.

5. *A limit on what the safe harbor does.* It protects the applicant's reliance. It does not convert an undetermined fact into a favorable one.

The fifth condition is where this reply meets the traversal rule in Gatewell's opening comments, which stands as filed. Two commenters address depth. TechNet would stop the HBOM "at the finished-component level, such as a packaged integrated circuit, which a downstream applicant can confirm with its suppliers." TechNet Comments at 4. Gatewell's proposed Tier 2 stops at the same boundary. It traverses to the entity that physically produced the finished component and does not reach inside it. CCIA would go further and limit disclosure to "Tier 1 manufacturers, final assembly entities, or entities with direct, material decision-making control," warning of "an unreasonable standard of strict liability." CCIA Comments at 6. A Tier 1 limit would make a contract manufacturer a terminal node, which Gatewell's opening comments opposed. A reliance provision with stated documents answers the strict-liability concern without that limit, because it defines what an applicant acting in good faith must be able to show. Under the opening comments' rebuttal rule, an undetermined origin does not rebut a presumption adopted under paragraph 149.

The second, third and fourth elements exist in published form. Annex C of the attached standard is a supplier origin declaration with the fields listed in item 2, in which the

declarant certifies the production sites, undertakes to give written notice within thirty days of any change of site, and states that the declaration "may be relied upon in the recipient's regulatory and commercial origin documentation." Attachment A, Annex C. Clause 4.7.3 sets evidence-age limits by document class. The bill-of-materials schema permits a design origin of "UNKNOWN" only "with a documented inquiry record." Attachment A, Annex B.1. The Commission can take the elements without taking the standard.

III. Confirming a Declaration Is Authentication, Not Adjudication

Carnegie reads the Odyssey matter as showing that "the gap Odyssey reveals is one of verification, not of intake," and observes that "detection would still have turned on someone testing the assertion against evidence outside the four corners of the filing." Carnegie Comments at 4. Gatewell agrees. What made detection possible in that matter was an assertion a named third party could contradict, and an inquiry that reached that party. PolkaSpots reaches the same conclusion: "the role attributed to each named producer should be confirmed by that producer's own signed statement . . . rather than resting solely on the applicant's assertion." PolkaSpots Comments at 3.

Gatewell's opening comments proposed that where an application names a U.S. entity as a producer, assembler, or manufacturer, the application include that entity's own signed confirmation. Comments of Gatewell Group LLC § VI. That recommendation stands, as does the companion request that the applicant state the location of compliance testing. What follows concerns a different actor, the reviewer.

Two comments appear to pull in opposite directions on who should check. Carnegie states that "Telecommunication Certification Bodies should not adjudicate these determinations," because they lack "the mandate, the classified access, or the interagency relationships that a national security determination requires." Carnegie Comments at 25. The TIC Council, whose members include those bodies, asks the Commission to "specify a standardized, machine-readable format" and to provide tools, because absent them "it would be difficult for a TCB to verify that an HBOM or SBOM actually demonstrates compliance." TIC Council Comments at 2.

Both can be accepted, because they concern different acts. Deciding whether a device poses a national security risk is a determination. Confirming that a named supplier

signed the declaration attributed to it, and stands by it, is authentication of a document. The second requires no classified access and no judgment about risk. It requires a contact point, which proposed § 2.911(d)(11) already collects for every named producer, and a rule about how many declarations are confirmed.

Recommendation. If reviewers are to check supplier and producer declarations at all, the Commission should state how in the rule or in OET guidance, so that review is uniform across certification bodies and the forum-shopping the TIC Council warns of does not arise. A workable statement has three elements. The reviewer, not the applicant, selects which declarations are confirmed. The reviewer obtains or corroborates the declarant's contact details independently of the applicant. The reviewer records what was confirmed and with whom. The number confirmed is a calibration question for the Commission. The attached standard states one such method for its own purposes, a reviewer-selected sample with independently corroborated contacts, at Part V, step 4, and is cited only to show that the method can be specified in a sentence. The method serves whether bills of materials are filed with the application or retained under §§ 2.938 and 2.945(c) as Carnegie proposes, because it attaches to the declarations and not to the filing event.

IV. Origin Attributes Can Be Specified Without a New Format

Commenters who address format mostly ask the Commission not to invent one. INCOMPAS, which opposes a filing mandate, asks in the alternative that the Commission "accept established machine-readable formats, including SPDX and CycloneDX, where those formats contain the information the Commission has lawfully required, rather than mandate a new FCC-specific artifact." INCOMPAS Comments at 35. PolkaSpots recommends that the Commission "specify the required attributes and signature requirements and accept any conformant format." PolkaSpots Comments at 2. The TIC Council asks for something different, a single format specified by the Commission together with analytical tools. TIC Council Comments at 2.

INCOMPAS's condition is the difficulty. The Information Technology Industry Council states that "[e]xisting standards-based formats, such as System Package Data Exchange (SPDX) and CycloneDX, are not designed to assign a place of production to software or allocate software value among countries." ITI Comments at 8. TIA notes, quoting CISA's HBOM Framework, that "current HBOM formats need some assistance to be portable

between suppliers and purchasers." TIA Comments at 16 n.15. The formats identify components and their suppliers. The Covered List question turns on where a component was produced and by whom.

An attribute list closes that gap without a new format and without choosing between PolkaSpots and the TIC Council, because a specified attribute list is what makes submissions comparable whatever container carries them. The list for origin is short. Annex B.1 of the attached standard is one published example, with thirteen fields per bill-of-materials line: model, line reference, description, manufacturer part number, component manufacturer ("not the distributor"), the manufacturer's headquarters country, country of origin in ISO 3166 alpha-2 with multi-country entries split into separate lines, country of design, supply channel, a sole-source flag, a flag for components that fix the device's character in its category, the identifier of the supplier declaration on file, and the date origin was last confirmed. Attachment A, Annex B.1. A machine-readable form of the schema is published at the address given in Section I and is dedicated to the public domain. Attachment A, Annex B (note).

The schema has limits the Commission should know. It records a country, not a site, on every line; sites appear on the supplier declarations. It does not separate development from design. It carries no value share by producer.

One drafting point bears on terms. Gatewell's opening comments asked the Commission to define "critical component," for purposes of § 2.911(d)(10), by four functional prongs. Comments of Gatewell Group LLC § II. That recommendation stands, and others propose limits of their own: PolkaSpots asks that the term "be defined functionally and objectively," PolkaSpots Comments at 3, and CCCME would limit it by reference to § 2.903(b)(2). CCCME Comments at 28-29. A further reason to define it has not been raised. Part 25 of the Federal Acquisition Regulation, from which the Commission proposes to borrow the domestic end product test, separately defines "critical component" as "a component that is mined, produced, or manufactured in the United States and deemed critical to the U.S. supply chain." 48 CFR 25.003. Section 25.101(a) does not itself use the term, so the collision is indirect. A reader who follows the Commission's cross-reference into Part 25 will nonetheless find the phrase already defined to mean something else.

V. The Value Element Is Feasible on the Applicant's Own Cost of Components

Most commenters who address proposed § 2.911(d)(10)(iv) call it unworkable. FDD supports it as proposed and does not say how an applicant would obtain the figure. FDD Comments at 5. Carnegie calls the element "not merely burdensome but infeasible as drafted," because "[t]hat is supplier cost data," and adds: "A party can reliably report what it pays its immediate supplier, but it cannot reliably allocate that figure across producers and production locations upstream." Carnegie Comments at 8. Carnegie would replace it with "a country-level concentration assessment like that found in Annex A" of the March 20, 2026 National Security Determination on routers. Id.

Gatewell's opening comments asked for a whole-device value denominator, because the domestic end product test is a ratio, and asked that the applicant report the portion of total component cost attributable to each production location. Comments of Gatewell Group LLC § III. The record shows that a figure allocated by producer and site is not in applicants' hands. A figure by country of origin is, and Gatewell refines its recommendation accordingly. The regulation the Commission proposes to borrow shows why. The test at 48 CFR 25.101(a) compares the cost of domestic components with the cost of all the components, and 48 CFR 25.003 defines the term: "(1) For components purchased by the contractor, the acquisition cost, including transportation costs to the place of incorporation into the end product or construction material (whether or not such costs are paid to a domestic firm), and any applicable duty (whether or not a duty-free entry certificate is issued); or (2) For components manufactured by the contractor, all costs associated with the manufacture of the component, including transportation costs as described in paragraph (1) of this definition, plus allocable overhead costs, but excluding profit." Both limbs draw on figures within the applicant's own books: what it paid for the components it buys, and its own cost of the components it makes. Neither requires a supplier's cost data, and neither allocates a purchased component's price among upstream producers.

Recommendation. Restate § 2.911(d)(10)(iv) to require what the test uses and the applicant has: total cost of components as defined at 48 CFR 25.003, and the share of that total by country of origin of each component, with aggregation permitted below a stated de minimis threshold. That yields the denominator the coverage test requires and

has the shape of the country-level assessment Carnegie proposes. Annex B.2 of the attached standard is a record of the same shape, computed there on bill-of-materials value at standard or actual purchase cost: one record per model per country, stating the percentage of value and of unit volume, the valuation basis, the twelve-month period used, and the date computed. Attachment A, Annex B.2. Treating such records as presumptively confidential, as Carnegie and others ask, is compatible with every recommendation in this reply.

VI. Conclusion

Whether or not the Commission requires these disclosures to be filed, applicants will certify facts held by their suppliers. Gatewell asks the Commission to state the documentary content of that certification in rule text or OET guidance:

1. A reliance safe harbor conditioned on a written request, a signed supplier declaration with stated minimum content and maximum age, and a retained gap record, which protects reliance without converting an undetermined fact into a favorable one.
2. A reviewer-side confirmation method for supplier and producer declarations, under which the reviewer selects what is confirmed and corroborates contacts independently, distinguished from any national security determination and additional to the producer confirmation proposed for § 2.911(d)(11) in Gatewell's opening comments.
3. An origin attribute list that any conformant format may carry.
4. A value element restated as total cost of components under 48 CFR 25.003 and its share by country of origin.
5. The functional definition of "critical component" proposed in Gatewell's opening comments, for purposes of § 2.911(d)(10), noting that 48 CFR 25.003 already gives the phrase a different meaning.

Attachment A is offered as evidence that each element can be specified.

Respectfully submitted,

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Attachment A: The Gatewell Protocol for Origin Evidence, Version 1.0, Public
Comment Draft, Revision 3 (Sept. 17, 2026).



AN OPEN STANDARD · VERSION 1.0 · PUBLIC COMMENT DRAFT ·
REVISION 3 · SEPTEMBER 2026

The Gatewell Protocol for Origin Evidence

A documentation standard for demonstrating non-covered origin of
connected equipment under the FCC Covered List regime

This document contains the complete Protocol: the standard (Parts I–VII), definitions, and Annexes A through G — the attestation form, the bill-of-materials origin schema, the supplier declaration, the deep-trace component matrices, the screening procedure, the verification statement, and the revision record. The Protocol is free to use, cite, and require of counterparties, under the Creative Commons Attribution 4.0 International license. Comment period open through October 31, 2026. HTML edition with clause anchors:
gatewellgroup.com/protocol/v1.0

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gatewellgroup.com/protocol

Conformity with this Protocol is a documentation standard. It is not an FCC, DoW, or DHS determination of any device's regulatory status and does not guarantee any authorization outcome. This document is not legal advice. Regulatory context verified against FCC sources as of September 16, 2026.

PART I

Purpose, scope, and regulatory context

1.1 Purpose

Equipment that is not foreign-produced under the FCC's Covered List entries may be authorized and sold in the United States — but its non-covered status must be certified with *sufficient evidence*, and no regulation prescribes what that evidence is. The Protocol defines the contents, provenance, quality, and maintenance of an **Origin Evidence File** ("OEF") for connected equipment in categories subject to the Covered List, so that a regulator, certification body, insurer, or commercial counterparty examining the file can trace every origin claim to an identified source document.

1.2 Scope

1.2.1 The Protocol applies, as of this version, to the following covered categories: unmanned aircraft systems and components; routers; power inverters; and advanced robotic devices. Categories subsequently added to the Covered List come within scope upon publication of a corresponding Annex D matrix.

1.2.2 The Protocol prescribes evidence and procedure only. It sets no ownership, content-percentage, or origin threshold of its own. Every outcome standard — whether a device is covered, whether it is foreign-produced, whether an ownership structure is acceptable — is incorporated by reference from the governing FCC Covered List entry, National Security Determination, or Conditional Approval guidance text as in force on the file's revision date.

1.2.3 An OEF assembled under this Protocol is designed to serve both directions of the regime: as the documentation basis for a non-covered determination, and as the evidence base for a Conditional Approval application, whose information requests (corporate structure, supply-chain disclosure, onshoring plan) the Part IV requirements track.

1.3 Conformance language

1.3.1 In this Protocol, **SHALL** states a requirement whose satisfaction is necessary to claim conformity; **SHOULD** states a recommendation, departure from which must be documented in the file with its rationale; **MAY** states a permission. Numbered statements are requirements; material introduced as a "Note" or marked *informative*, including quotations from regulatory texts, is provided for convenience and does not add or alter requirements. Where a quotation and the source text differ, the source text governs.

1.4 Regulatory context (informative)

The following is the regulatory posture against which this version was drafted, stated for context and re-verified at each Protocol revision:

- The FCC added foreign-produced **power inverters** and **advanced robotic devices** to the Covered List by National Security Determinations dated July 27, 2026, published with the list update of July 28, 2026, each accompanied by Conditional Approval guidance ("FCC Conditional Approval guidance (July 27, 2026)").
- For both categories, the guidance states that Conditional Approval applications **must be submitted by January 1, 2028**, as a machine-readable PDF, and that submissions must include a certification by an authorized corporate officer that all information is complete and accurate and that any material change will be promptly disclosed.
- The advanced-robotics National Security Determination defines "**foreign-produced**" as any article that does not qualify as a "*domestic end product*," as that term is defined in 48 CFR § 25.101(a) — the Buy American definition. For power inverters, the determination as modified by DA 26-870 (August 20, 2026) defines the term disjunctively: an article is foreign-produced unless it is either a 48 CFR § 25.101(a) domestic end product or eligible for the Advanced Manufacturing Production Credit under 26 U.S.C. § 45X for domestic production. Section 25.101(a) treats commercially available off-the-shelf (COTS) items separately in federal procurement. The Commission's guidance on these two listings states that the COTS exception is "inapplicable to whether a device is a 'domestic end product' under section 25.101(a)" and that "[a]ll components, including COTS components, must be considered" (FCC, Covered List FAQs for advanced robotic devices and power inverters, fcc.gov/covered-list-faqs-robots-inverters, as retrieved September 8, 2026). The same guidance states that an applicant must have "sufficient evidence that the device in question was not produced in a foreign country" and that "there is no specific documentation or evidence required."
- Grants of Conditional Approval have carried onshoring conditions and, per the guidance, require quarterly onshoring status reporting to the issuing agency (see 3.3).

1.5 Open questions for the comment period

Comment is specifically invited, through October 31, 2026 at protocol@gatewellgroup.com, on the following, in addition to any other aspect of the Protocol:

1. **Evidence for the domestic end product test.** How the component-cost test of 48 CFR § 25.101(a), and for power inverters eligibility under 26 U.S.C. § 45X, should be evidenced in the file: which cost records suffice, how supplier cost data that a manufacturer cannot compel should be handled, and how the computation can be verified while cost data stays confidential. The Commission's guidance has settled that COTS components are counted (see 1.4); the question that remains is documentary. *Revision 2: this question replaces the Revision 1 question on COTS treatment, which the Commission's guidance answered.*
2. **EV supply equipment and the utility-interactive scope.** How the power-inverter definition's element (a), as narrowed by DA 26-870 (August 20, 2026) to reach only a "utility-interactive inverter as that term is defined in UL 1741 sections 2.1.23, 2.1.52," applies to classes of EV supply equipment

— in particular bidirectional (vehicle-to-grid) EVSE that operates in parallel with the electric utility. The Protocol asserts no conclusion; Annex D lists EVSE components so that files can be assembled under either reading pending clarification.

3. **Calibration of evidence-quality rules.** Whether the evidence-age limits (§4.7), confirmation counts (Part V), and retention periods are set at workable levels for mid-size manufacturers.
4. **Annex D completeness.** Whether the deep-trace component matrices omit components that determine a device's character in its category.

PART II

Definitions

Covered category

An equipment category subject to a Covered List entry restricting foreign-produced equipment, per the FCC's list as published at fcc.gov/supplychain/coveredlist on the file's revision date.

Conditional Approval

A determination by the Department of War, or where applicable the Department of Homeland Security, that a given device or class of devices does not pose the risks identified in the applicable National Security Determination, permitting FCC equipment authorization notwithstanding the Covered List entry.

Foreign-produced

As used in the applicable Covered List entry and its accompanying guidance for the category in question. For the advanced-robotics entry, the National Security Determination of July 27, 2026 defines the term as any article that does not qualify as a "domestic end product" as defined in 48 CFR § 25.101(a); for the power-inverter entry, the determination as modified by DA 26-870 (August 20, 2026) defines it as any article that is neither a 48 CFR § 25.101(a) domestic end product nor eligible for the 26 U.S.C. § 45X Advanced Manufacturing Production Credit for domestic production. The OEF must record which entry text and guidance version its determinations reference. [Definitions differ by entry and evolve; the Protocol deliberately incorporates them by reference rather than restating them.]

Final assembly

The production step at which the device's major subassemblies are integrated into the finished unit as shipped, including firmware loading if performed at that site.

Deep-trace component

A component listed for the device's category in Annex D, whose origin must be documented one supplier tier beyond the manufacturer's own records.

Sole-source supplier

A supplier of a BOM line item for which no alternate supplier is qualified for production use at the revision date.

Material change

Any event listed in Part VI (change control).

Certified translation

An English translation accompanied by a signed, dated statement of the translator identifying the source document and attesting to the translator's competence in both languages and to the completeness and accuracy of the translation.

Qualified verifier

A party competent in supply-chain documentation and the Covered List regime, independent in judgment, who conducts the Part V methodology. Where the verifier's organization assisted in assembling the file under examination, the verifying individual and the assisting individual are different people, separated by the information barrier of Part V, and the statement discloses the arrangement.

Working papers

The verifier's contemporaneous record of the items examined, sources consulted, confirmations performed, computations made, and exceptions found in a Part V examination.

Officer

A person with authority to bind the attesting entity and knowledge of, or verified reports covering, the facts attested. For a file supporting a Conditional Approval submission, an authorized corporate officer within the meaning of the FCC Conditional Approval guidance (July 27, 2026).

Revision date

The date stated on the OEF's change record (Annex G) for its current revision. All currency periods in this Protocol run from the revision date.

PART III

Conformity levels

Level	Requirement	Declared by	Currency
1 · DOCUMENTED	Complete OEF per Part IV; every element officer-attested (Annex A)	Manufacturer (self-declared)	12 months from revision date
2 · VERIFIED	Level 1 + independent examination per Part V with issued verification statement (Annex F)	Qualified verifier	12 months from verification date
3 · MONITORED	Level 2 + standing Part VI change control + annual re-verification; for Conditional Approval holders, + the §3.3 quarterly onshoring evidence module	Qualified verifier	Continuous; lapses automatically if re-verification is missed

3.1 Currency and lapse

3.1.1 A Level 1 or Level 2 claim SHALL NOT be made once the applicable currency period has elapsed without re-attestation (Level 1) or re-verification (Level 2). **3.1.2** Level 3 status lapses automatically on the day annual re-verification falls due unperformed, or on the thirty-first day after a Part VI change that

has not been re-attested. A lapsed status is regained only by completing the missed step; the Annex G record SHALL show the lapse and its cure.

3.2 Level selection

3.2.1 A manufacturer MAY claim any level it satisfies. Buyers and importers adopting the Protocol by reference SHOULD state which level, and what currency, they require of counterparties.

3.3 Quarterly onshoring evidence module (Conditional Approval holders)

3.3.1 This module applies at Level 3 wherever a scheduled model is marketed under a Conditional Approval whose conditions include a U.S. manufacturing and onshoring plan.

3.3.2 The FCC Conditional Approval guidance (July 27, 2026) requires "a dedicated point of contact or office responsible for implementing and overseeing the U.S. manufacturing and onshoring plan," which "must provide the agency issuing the Conditional Approval an update on the status of their onshoring plan once a quarter." The OEF SHALL identify that point of contact or office by name, title, and reporting line.

3.3.3 For each calendar quarter, the manufacturer SHALL assemble a quarterly onshoring evidence file, officer-reviewed and closed not later than fifteen days after quarter end, containing:

1. progress against each milestone of the time-bound onshoring plan, with dates;
2. capital expenditure committed and expended against plan, including financing and other investments dedicated to U.S. manufacturing and assembly (guidance §3(d));
3. current U.S. headcount against plan, and hires made in the quarter (guidance §3(c), (d)(i));
4. U.S. manufacturing facility square footage, current and added in the quarter (guidance §3(d)(ii));
5. percentage of components assembled in the United States, computed on a stated basis held consistent quarter over quarter (guidance §3(c));
6. variances from plan, each with an explanation and a recovery plan; and
7. where the manufacturer holds any other Conditional Approval, an inventory of progress across all onshoring plans submitted (guidance §3(e)).

3.3.4 Quarterly files SHALL be retained with the OEF per §4.7 and made available to the verifier at each re-verification. The Protocol governs the evidence file only; the content, form, and addressee of the report actually made to the issuing agency are the holder's obligation under its grant.

PART IV

The Origin Evidence File

4.1 Device identity

4.1.1 The OEF SHALL contain a complete schedule of the covered-category models within scope: marketing names, model numbers, FCC IDs or SDoC status, equipment classes, and authorization dates,

reconciled to public FCC records. **4.1.2** Hardware revisions marketed under one model number SHALL be listed where they differ in any deep-trace component or production site. **4.1.3** The schedule SHALL state, per model, the file sections and document IDs that evidence it.

4.2 Coverage determination

4.2.1 The OEF SHALL record, for each scheduled model, a determination of whether the model falls within each potentially applicable Covered List entry, made against the operative definitions incorporated by the listings — not against paraphrases of them. The record SHALL contain: (a) the definition text applied, quoted, with its source document, date, and the date and location of retrieval; (b) a criterion-by-criterion analysis citing the document IDs evidencing each factual element (weight, connectivity, conversion function, software function, exclusion applicability); (c) the conclusion; and (d) preparer and date.

4.2.2 Because entry texts and guidance are revised, the current texts SHALL be re-retrieved and the determination re-confirmed at each revision date, and the retrieval evidenced.

4.2.3 A determination that a model is *not* covered SHALL identify the specific definitional element that is not met, or the specific exclusion relied on, and cite the evidence for it. A determination resting on the "foreign-produced" element SHALL record the 48 CFR § 25.101(a) position taken and its factual basis.

Note (informative): the Commission's guidance states that the COTS exception is inapplicable to these listings and that COTS components are counted (see 1.4). A position that excludes them must identify the later authority it relies on.

INFORMATIVE — OPERATIVE DEFINITIONS FOR THE JULY 2026 CATEGORIES (POWER-INVERTER DEFINITIONS AS MODIFIED BY DA 26-870, VERIFIED AGAINST PRIMARY TEXT AUGUST 20, 2026; ROBOTICS VERIFIED AUGUST 8, 2026; RE-VERIFY AT EACH REVISION DATE)

Power inverter — Second Power Inverter National Security Determination as adopted by DA 26-870 (August 20, 2026), superseding the July 27, 2026 definition: "The term 'power inverters' shall mean— (a) Changes dc power to ac power, to include bidirectional devices, that is intended for use in parallel with an electric utility to supply common loads and sometimes deliver power to the utility, i.e., a utility-interactive inverter as that term is defined in UL 1741 sections 2.1.23, 2.1.52; and (b) Contains, or is designed, equipped, or configured to accept, a component that enables remote communication, control, sensing, data-collection, or monitoring through Ethernet, Wi-Fi, cellular, Bluetooth, or other similar connections, whether wired or wireless." The definition states both elements conjunctively; a §4.2.1 analysis addresses each. Element (b) reaches a unit merely "configured to accept" a communications component, and off-grid units incapable of utility connection fall outside element (a).

Advanced robotic device — National Security Determination on the Threat Posed by Foreign-Produced Advanced Robotic Devices (July 27, 2026): a "mechanical mobile device, including autonomous mobile robots, humanoid robots, and quadrupeds," that (i) "is capable of locomotion, obstacle avoidance, navigation, or movement on the ground"; (ii) "operates at a distance from a human operator or supervisor based on commands or in response to sensor data or any combination thereof"; (iii) has a combined weight of the device "and, if applicable, ground station or docking station" over 4.4 lbs; and (iv) contains each of: "a sensor capable of perceiving its environment"; "a component that is capable of providing network connectivity (wired or wireless, including Bluetooth/WiFi, cellular, or satellite) with connection speeds of at least 200 kbps in either direction"; and "software running either locally or remotely, including firmware and AI or machine-learning model weights, that controls the robot's autonomous navigation or movement perception, data collection, or remote command-and-control." The definition excludes: a "connected vehicle" as defined in 15 CFR § 791.301, of

any gross weight; a vehicle operated only on a rail line; an uncrewed aircraft or uncrewed aircraft system as defined in 47 CFR § 88.5; an unmanned underwater vehicle able to operate without a human occupant; items classified as devices under section 513 of the Federal Food, Drug, and Cosmetic Act (21 U.S.C. § 360c), including surgical instruments, medical and surgical robotic systems, external limb prostheses and their components, and ambulatory and mobility assistive devices, whether or not powered and regardless of clearance pathway; and fixed, stationary, non-mobile robots, including articulating, parallel/delta, Cartesian/gantry, or SCARA robots intended for industrial or medical use.

Foreign-produced — advanced-robotics determination (July 27, 2026): "the term 'foreign-produced' refers to any article that does not qualify as a 'domestic end product,' as that term is defined in 48 CFR § 25.101(a)."

Power-inverter determination as modified by DA 26-870 (August 20, 2026): "The term shall mean power inverters as defined above that are not either— (a) Eligible for the Advanced Manufacturing Tax Credit in 26 U.S. Code § 45X for domestic production or (b) A domestic end product as defined in 48 CFR § 25.101(a) because they are manufactured in the United States and the cost of domestic components exceeds 65% of the total component cost for items delivered in calendar years 2024 through 2028 or 75% for items delivered starting in calendar year 2029."

4.3 Production provenance

4.3.1 The OEF SHALL identify every site performing final assembly, principal subassembly, firmware loading, or production or compliance testing for a scheduled model: legal operator, address, ownership or contractual relationship to the manufacturer, and the step performed. **4.3.2** It SHALL contain a production-flow narrative from major components to shipped unit, identifying at which named site each step occurs. **4.3.3** Each operating entity SHALL provide a signed site attestation from one of its officers covering the steps performed and the site's operator of record. **4.3.4** Where a site is operated under contract (CM/ODM), the file SHALL identify the contract counterparty and the contractual right under which the manufacturer obtains the site information attested.

4.4 Component origin

4.4.1 The OEF SHALL contain a bill of materials per model conforming to the Annex B.1 schema, identifying country of origin per line item, with deep-trace documentation (Annex C supplier declarations, one tier up) for every Annex D component present in the design.

4.4.2 The OEF SHALL state, per model, the country or countries of origin of the device's design (electrical, mechanical, and software architecture), with the evidence relied on. [The FCC Conditional Approval guidance (July 27, 2026), §2(b), requests country of origin for all components *and* for the design of the device.]

4.4.3 The OEF SHALL contain a supply-chain concentration summary per model conforming to the Annex B.2 schema, quantifying concentration by country of origin expressed as **both** a percentage of total BOM value and a percentage of component production volume, on stated bases, recomputed at each revision. [Tracks guidance §2(g): "Quantitative assessment of supply chain concentration by country, expressed as both a percentage of total value and production volume."]

4.4.4 The OEF SHALL contain a sole-source register per model conforming to the Annex B.3 schema, identifying every sole-source supplier, its country, and — for each — a documented contingency plan

stating the course of action if that supplier becomes unavailable (qualified alternate and qualification lead time, buffer-stock policy, or redesign path). [Tracks guidance §2(h).] **4.4.5** Contingency plans SHALL be reviewed at each revision and on any Part VI trigger affecting the supplier.

4.5 Corporate provenance

4.5.1 The OEF SHALL document the manufacturer's complete ownership structure — parents, subsidiaries, affiliates, and joint ventures — to its ultimate parents, with each entity's jurisdiction. **4.5.2** It SHALL identify beneficial owners holding five percent or greater equity, with holder identity and jurisdiction — the threshold the FCC Conditional Approval guidance (July 27, 2026), §1(c), itself requires. **4.5.3** It SHALL list board members and executive leadership, including each person's nationality and country of residence [guidance §1(d)]. **4.5.4** It SHALL disclose any foreign-government ownership, control, influence, financing, or material support, including any arrangement that allows a foreign person or government to influence operations, decision-making, or access to technology [guidance §1(e)]; a statement that no such arrangement exists SHALL be made expressly, not by omission. **4.5.5** All chain entities, five-percent beneficial owners, and board and executive members SHALL be screened per the Annex E procedure, dated.

4.6 Software, firmware, and intellectual-property provenance

4.6.1 The OEF SHALL contain an SBOM in SPDX or CycloneDX format for device firmware and companion applications, corresponding to the currently shipping build. **4.6.2** It SHALL identify the entities responsible for intellectual-property ownership and for software updates for the device [guidance §2(c)], including the licensor of any third-party autonomy, navigation, or connectivity stack. **4.6.3** It SHALL state the country of origin of onboard software and firmware [guidance §2(f)] — where the category definition reaches AI or machine-learning model weights, including where the models were trained and by whom. **4.6.4** It SHALL identify the location and operator of build and code-signing infrastructure, and update-server jurisdictions and operators. **4.6.5** It SHALL contain a data-flow summary identifying every endpoint the device communicates with in normal operation, with operator and jurisdiction.

4.7 Evidence quality, translation, and retention

4.7.1 Document identity. Every document in the OEF SHALL bear a unique document ID, and a master index SHALL map each Part IV requirement to the document IDs satisfying it. Reproductions SHALL preserve legibility of all seals, stamps, and signatures. Files intended to support a Conditional Approval submission SHOULD be maintained as machine-readable PDF, the format the guidance requires of applications.

4.7.2 Translation. Every source document not in English SHALL be accompanied by an English translation, retained alongside the original-language document. The translation SHALL be a certified translation for: corporate registry filings, ownership and beneficial-ownership statements, site attestations, supplier declarations, and any document relied on in a §4.2 coverage determination. Machine translation MAY be used for screening and working purposes but SHALL NOT substitute for a required certified translation.

4.7.3 Evidence age. At each revision date, the following classes SHALL be no older than stated, measured from document date to revision date:

Document class	Maximum age at revision date
Corporate registry extracts and standing certificates (§4.5)	12 months
Beneficial-ownership statements at the five-percent threshold (§4.5)	12 months
Site attestations (§4.3)	12 months
Annex C supplier declarations for deep-trace lines (§4.4)	12 months
Annex E screen (§4.5)	12 months, and re-run on any Part VI trigger
SBOM (§4.6)	Must match the currently shipping build; regenerated at each release
Concentration summary and sole-source register (§4.4)	Recomputed / reviewed at each revision
Photographic and production-flow evidence (§4.3)	24 months

4.7.4 Retention. Each OEF revision, with every document it references, SHALL be retained for not less than ten years after the revision is superseded. A document referenced by multiple revisions is retained per the latest revision referencing it. Quarterly onshoring files (§3.3) are retained on the same terms.

4.8 Attestation

4.8.1 The OEF SHALL close with the Annex A certification, signed by an officer of the manufacturer, covering the file as of its revision date.

PART V

Verification methodology

Level 2 and 3 verification concludes with the Annex F statement. The verifier SHALL perform each of the following and record it in working papers:

- 1. Document authentication.** Authenticate source, date, and document ID of every corporate-chain document and every deep-trace supplier declaration; authenticate other classes by sampling, with the sampling basis recorded.
- 2. Schedule reconciliation.** Reconcile the §4.1 device schedule against public FCC authorization records.
- 3. Coverage determination review.** Confirm that the definition texts quoted in each §4.2 record match the texts in force at the verification date, retrieving the current texts and recording the retrieval; confirm that each cited factual element is evidenced by the document IDs given.

4. **Supplier confirmations.** Confirm directly with the declaring suppliers not fewer than three Annex C declarations or ten percent of the declarations on file, whichever is greater, selected by the verifier and including at least one broker-channel line where any exists; contact details SHALL be obtained or corroborated independently of the manufacturer.
5. **Corporate reconciliation.** Reconcile the corporate chain against registry filings in each named jurisdiction, each filing retrieved within ninety days of the verification date, and reconcile five-percent beneficial ownership to shareholder registers or ownership statements.
6. **Quantitative reconciliation.** Recompute the Annex B.2 concentration summary from the B.1 bill of materials for each model, and reconcile the B.3 sole-source register against B.1; confirm each sole-source contingency plan exists and states a course of action.
7. **Screening.** Re-run the Annex E screen as of the verification date.
8. **Statement.** Issue a written statement per Annex F of what was examined and confirmed, the Protocol version applied, and the file revision covered.

Working papers. The verifier SHALL retain working papers — items examined, sources and retrieval dates, confirmation correspondence, computations, exceptions and their resolution — for not less than ten years from the verification date, and SHOULD make them available to a successor verifier under confidentiality terms.

Information barrier. A verifier's organization MAY have assisted in assembling the file under examination, on the following conditions. The individual who assisted SHALL NOT be the individual who verifies. The two SHALL work from separate files: the verifier without access to the assembly engagement's commercial terms or working drafts, and the assisting individual without access to the verification working papers before the statement is issued. Each SHALL reach their own conclusion on their own record, and no person in the organization, its principal included, SHALL direct, edit or reverse either conclusion; a disagreement between the two is recorded in both files and disclosed to the manufacturer as it stands. The verifier SHALL be paid nothing that varies with the assembly engagement. The statement SHALL disclose the arrangement and identify the two roles.

PART VI

Change control

Each of the following is a material change requiring re-attestation of the affected sections within thirty days (and re-verification, at Level 3):

1. A new, changed, or discontinued production, assembly, testing, or firmware-loading site;
2. A change of contract manufacturer or ODM for any scheduled model;
3. A sourcing change affecting any deep-trace component;
4. Any change in the corporate chain, or in beneficial ownership at the five-percent threshold;
5. Any change in board membership or executive leadership recorded under §4.5.3;

6. Any new, changed, or terminated arrangement of the kind disclosed under §4.5.4 (foreign-government ownership, control, influence, financing, or material support);
7. A change of an entity responsible for intellectual-property ownership or software updates (§4.6.2);
8. A sole-source supplier becoming unavailable, or an event invalidating a §4.4.4 contingency plan;
9. Any Covered List addition or guidance change touching an entity, component, or category in the file.

Note (informative): for Conditional Approval holders, the officer certification the guidance requires extends to prompt disclosure of material changes to the U.S. Government; the thirty-day file deadline above does not extend, and is not a substitute for, that obligation.

Note (informative) — change control and authorization status: for a device that is covered but relies on an equipment authorization granted before its category was listed, several triggers above (1, 2, 3 and 8) describe events the manufacturer may be unable to execute at all rather than merely obliged to re-attest. Covered equipment is excluded from the permissive-change procedures at 47 CFR §§ 2.932(b) and 2.1043(b), and that exclusion reaches devices authorized before their category was listed. A waiver announced on July 28, 2026 (DA 26-789) restores Class I and Class II permissive changes for software and firmware updates that mitigate consumer harm, at least until January 1, 2029; it does not reach hardware, and a replacement authorization is unavailable while the device remains covered and foreign-produced. A single end-of-life component can therefore terminate a model's marketability without any further action by the Commission. Manufacturers in this position SHOULD treat the §4.4.4 sole-source register and its contingency plans as the primary risk instrument in the file rather than a formality, and SHOULD record, per model, the authorization date, the coverage determination, and the earliest date on which a known component end-of-life is expected to force a hardware change. Verify the current waiver posture before relying on this note; it is informative and reflects guidance as understood at the revision date.

PART VII

Claims of conformity; maintenance

Conforming parties may state: "[Company]'s Origin Evidence File for [models] conforms to the Gatewell Protocol for Origin Evidence, Version 1.0, at Level [1/2/3], as of [date]." Claims must name the level and date, may not extend to models outside the schedule, and may not state or imply government endorsement. Buyers and importers may adopt the Protocol by reference and require a stated level and current date as a condition of vendor qualification.

The Protocol is versioned; substantive changes are published with a comment period and a dated changelog. Files verified under a prior version remain valid to that version's terms until next re-verification. The Protocol yields to any mandatory documentation standard on its effective date.

ANNEX A

Officer attestation of origin evidence

Execute one per OEF revision. Retain the original in the file; provide copies to counterparties with the file's summary.

Note (informative): this annex is drafted to the certification standard of the FCC Conditional Approval guidance (July 27, 2026), which requires certification by an authorized corporate officer that all information is complete and accurate and that any material change will be promptly disclosed, and which states that applicants that knowingly violate the terms of a Conditional Approval or materially misrepresent information provided to the U.S. Government will have the approval terminated and will be precluded from applying again.

Attesting entity: _____ Jurisdiction of organization: _____

OEF revision date: _____ Protocol version: _____ Conformity level claimed: _____

Models covered (or schedule reference): _____

I certify that I am an officer of the attesting entity with authority to make this certification; that I have reviewed the Origin Evidence File identified above; that the statements of device identity and coverage determination, production site, component origin, corporate ownership and governance, and software, firmware, and intellectual-property provenance it contains are complete and accurate as of the revision date to the best of my knowledge after due inquiry; that the supporting documents it references are authentic and current per Part IV of the Protocol; and that the entity will promptly disclose any material change as defined in Part VI of the Protocol to recipients of the file, and will re-attest affected sections within thirty days.

I understand that this file may be furnished to United States government agencies, certification bodies, insurers, and commercial counterparties.

Signature: _____ Date: _____

Name: _____ Title: _____

ANNEX B

Bill-of-materials origin schema

Note (informative): Annex B is also published in machine-readable form, as a JSON Schema and a CSV template, at gatewellgroup.com/protocol/v1.0. The schema and the template are dedicated to the public domain under CCo 1.0.

B.1 BOM line schema

One record per BOM line item, per model, in CSV or XLSX, under revision control matching the OEF revision. Required fields:

Field	Definition	Rules
model_id	Manufacturer model number of the finished device	Must appear in the §4.1 schedule
item_ref	BOM line reference / internal part number	Unique within model
description	Component description	Plain language
mpn	Manufacturer part number of the component	As marked or documented
component_mfr	Component manufacturer legal name	Not the distributor
mfr_country	Component manufacturer HQ country	ISO 3166 alpha-2
coo	Country of origin of the component as supplied	ISO 3166 alpha-2; "MULTI" prohibited — split lines
design_origin	Country where the component was designed	ISO 3166 alpha-2; required for deep-trace lines; "UNKNOWN" only with a documented inquiry record
supply_channel	Direct / distributor / broker	Broker-sourced deep-trace components require Annex C declaration regardless of tier
sole_source	Y if no alternate supplier is qualified at the revision date	Y requires a B.3 register entry
deep_trace	Y if the component matches Annex D for the category	Y requires declaration_ref
declaration_ref	Identifier of the Annex C declaration on file	Required when deep_trace = Y
verified_date	Date origin was last confirmed	Within 12 months of revision date for deep-trace lines

Passive components (resistors, capacitors, standard connectors, fasteners, enclosures) may be aggregated by commodity class with a single coo entry per class where no Annex D match exists.

B.2 Supply-chain concentration summary

One record per model per country of origin appearing in B.1, recomputed at each revision [tracks FCC Conditional Approval guidance (July 27, 2026), §2(g)]:

Field	Definition	Rules
model_id	Finished device model	Must appear in the §4.1 schedule
country	Country of origin	ISO 3166 alpha-2; every coo in B.1 must appear
pct_value	Percentage of total BOM value originating in the country	Column sums to 100 ± 0.5 rounding
pct_volume	Percentage of component production volume (unit count) originating in the country	Column sums to 100 ± 0.5 rounding
basis_note	Valuation basis (standard cost or actual purchase cost) and the 12-month period used	Basis held consistent revision over revision; changes documented
computed_date	Date of computation	Equal to or later than the BOM revision it summarizes

B.3 Sole-source supplier register

One record per sole-source line item, per model [tracks guidance §2(h)]:

Field	Definition	Rules
model_id / item_ref / mpn	The B.1 line concerned	Every B.1 line with sole_source = Y appears here
supplier	Sole-source supplier legal name	—
supplier_country	Supplier country	ISO 3166 alpha-2
contingency_ref	Document ID of the contingency plan	Plan must state the course of action if the supplier becomes unavailable: qualified alternate and qualification lead time, buffer-stock policy, or redesign path
last_reviewed	Date the plan was last reviewed	At each revision, and on any Part VI trigger affecting the supplier

ANNEX C

Supplier origin declaration

Executed by the component supplier (one tier up from the manufacturer). One declaration may cover multiple part numbers from the same supplier and production site. A declaration executed in a language other than English requires a certified translation per §4.7.2, retained with the original.

Declaring supplier: _____ Country: _____

Part numbers covered: _____

Production site(s) for these parts (name, city, country):

Site operator, if different from declarant: _____

Declarant contact for verification confirmations (name, e-mail):

The declarant certifies that the parts identified above and supplied to _____ are produced at the site(s) stated; that the declarant will notify the recipient in writing within thirty days of any change in production site for these parts; and that this declaration may be relied upon in the recipient's regulatory and commercial origin documentation.

Signature: _____ Name/title: _____

Date: _____

ANNEX D

Deep-trace component matrices

Components below determine the device's character in its category and require one-tier-up origin documentation (Annex C) wherever present in the design. Where a listed function is integrated into a combined SoC, the SoC is the deep-trace component.

Category	Deep-trace components
Routers & gateways	Wi-Fi / RF system-on-chip and radio front-end modules; network processor / main CPU; Ethernet PHY and switch silicon; cellular baseband module (if present); flash containing bootloader
Power inverters & EV supply equipment	Power-conversion stage (modules or discrete bridge assemblies); main control MCU/DSP; communications module (Wi-Fi/BT/cellular/PLC); current/voltage sensing assemblies; contactor/relay assemblies (EVSE)
Advanced robotic devices	Main application processor; motor-control assemblies; actuator and end-effector assemblies; navigation/perception sensors (LiDAR, vision modules, IMU); radio modules; battery packs and battery-management electronics
UAS & components	Flight controller; radio/data-link modules; camera/gimbal payloads; GNSS modules; ESCs and motor controllers; battery-management electronics

Matrices are maintained with the Protocol and revised as Covered List guidance evolves; a design lacking a listed component simply omits it. The advanced-robotics row tracks the component classes the National Security Determination (July 27, 2026) itself identifies as critical — actuators, end effectors, batteries, and sensors — plus the processing and radio elements of the operative definition.

ANNEX E

Covered-entity screening procedure

1. Assemble the screen list: every entity in the §4.5 corporate chain; every beneficial owner at the five-percent threshold and every board and executive member recorded under §4.5.3; every production-site operator in §4.3; every deep-trace component manufacturer in the §4.4 BOM.
2. Screen each against: (a) the entities named in current Covered List entries and the FCC's published lists of their subsidiaries and affiliates; (b) the current Covered List category definitions as applied to the entity's role; and (c) US sanctions lists (OFAC SDN and consolidated lists) as a supplementary check — natural persons against (c).
3. Record for each screened entity: name as screened, aliases checked (including native-script and transliterated forms), source lists and their publication dates, result (clear / match / possible match), and reviewer.
4. Any match or possible match halts reliance on the file pending resolution, which must be documented in the file with its basis.
5. The screen is current for twelve months, and must be re-run upon any Part VI change or any relevant Covered List addition.

ANNEX F

Verification statement (Levels 2–3)

Issued by the qualified verifier on completion of the Part V methodology. The statement, not the mark, is the operative document.

Verifier: _____ Engagement ref: _____

Manufacturer and OEF revision examined: _____

Protocol version applied: _____ Level: _____ Verification date: _____

The verifier states that it performed each step of the Part V methodology, and in particular that it: authenticated the documents comprising the file; reconciled the device schedule against public FCC authorization records; confirmed that the coverage-determination texts quoted in the file match the texts in force as of the verification date; confirmed the following supplier declarations directly with the declaring suppliers (not fewer than three or ten percent of declarations on file, whichever is greater):

_____; reconciled the corporate chain, including five-percent beneficial ownership, against registry filings retrieved within ninety days; recomputed the Annex B.2 concentration summary and reconciled the B.3 sole-source register; and re-ran the Annex E screen as of the verification date with the result: _____.

Working papers reference and retention location: _____

Exceptions, qualifications, and unresolved items:

Independence disclosure: the verifier's organization [did / did not] provide assistance in the assembly of this file. Where it did: assisting individual _____, verifying individual _____, and the information barrier of Part V was in place throughout the examination. Nature of assistance: _____

Signature: _____ Name/title: _____

ANNEX G

Revision record

Maintained at the front of every OEF:

Rev	Date	Sections changed and why (incl. Part VI trigger)	Attested by	Verified (L2/3)

Protocol version history

Version	Date	Changes
1.0 (draft)	August 2026	Initial public comment draft, published August 7, 2026. Amended later in August 2026 for DA 26-870 (power-inverter definitions, August 20, 2026).
1.0 (draft), Revision 2	September 17, 2026	1.4, 1.5 and 4.2.3 amended: the Commission's guidance answered the COTS question, so comment-period question 1 is closed and replaced by a question on evidencing the domestic end product test. License stated as CC BY 4.0. HTML edition with clause anchors published at gatewellgroup.com/protocol/v1.0 , with Annex B in machine-readable form under CC0 1.0. Regulatory context re-verified September 16, 2026.
1.0 (draft), Revision 3	September 17, 2026	Part V information barrier added: where the verifier's organization assisted in assembling the file, the assisting and verifying individuals are different people working from separate files, each conclusion is their own and subject to no direction, and the arrangement is disclosed. Definition of qualified verifier and the Annex F independence disclosure aligned. Replaces the disclosure-only rule of Revision 2.

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