Before the
U.S. DEPARTMENT OF ENERGY
Office of Cybersecurity, Energy Security, and Emergency Response
Washington, D.C. 20585

In the Matter of

Securing the United States Bulk-Power System

Request for Information

Docket No. DOE-HQ-2026-1123

91 FR 57322 (Sept. 9, 2026)

RESPONSE OF GATEWELL GROUP LLC

Submitted in response to the Request for Information published at 91 FR 57322 (Sept. 9, 2026), for which "[w]ritten responses, data, and information are requested and will be accepted on or before October 9, 2026." 91 FR at 57323.

I. Introduction, Interest, and Scope

Gatewell Group LLC responds to the Department's Request for Information. Question numbers appear in the headings below.

Role and basis of experience (A-1). Gatewell is a Los Angeles firm. It is an advisory firm on origin evidence, which is to say on what records establish that an article was manufactured, produced, or assembled in a stated place. It serves purchasers in the United States and manufacturers selling into the United States. Gatewell is not an asset owner or operator, a manufacturer, a supplier, a developer, an installer, or a distributor of bulk-power system electric equipment. It responds as a service provider to purchasers and manufacturers.

The basis for that experience is the firm's advisory work on origin evidence for buyers and manufacturers, the documentation standard it publishes, and its participation in proceedings that turn on origin documentation. At the Federal Communications Commission, Gatewell filed comments in ET Docket No. 21-232 on August 20, 2026 (ECFS 26110072507) and reply comments on September 17, 2026 (ECFS 26110076947),

and comments in PS Docket Nos. 26-184 and 26-189 on August 18, 2026 (ECFS 26110071980, 26110071981, and 26110071982). It filed comments in DFARS Case 2022-D011 on August 20, 2026, posted as DARS-2026-0298-0012.

Interest. 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, and 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 Department to adopt, reference, or endorse that standard, and nothing recommended below would require any party to retain Gatewell or another third party.

Scope. This response addresses (A-1), (A-2), (A-5), (A-5)(a), (A-5)(c), and the safeguards sentence of (A-6). Gatewell takes no position on the remaining questions, including transaction review, licensing, the § 2(e) list, mitigation, existing equipment, Federal procurement preferences, and the cost and burden questions put by (A-3) and questions B through G. Statements below about the records a manufacturer already holds are made in answer to (A-5)(c)'s question about what can reasonably be provided. Gatewell recommends below that the Department borrow a cost-of-components definition from the Federal Acquisition Regulation. It takes no position on whether bulk-power system electric equipment should receive any Federal procurement preference. As to (A-5)(b), Gatewell states one point and no more. Whether software, firmware, services, or remote-access capabilities were "designed, developed, manufactured, or supplied" by a person tied to a Covered Foreign Entity, 91 FR at 57325, is a question about entities, distinct from the question of place put by the opening sentence of (A-5).

II. Question (A-5): The Domestic Side of "Foreign-Produced" Needs Stated Documentary Content

The order defines the term by exclusion. "The term 'foreign-produced' means an article that is not manufactured, produced, or assembled in the United States." Exec. Order No. 14421 § 5(c), 91 FR 55995 (Aug. 31, 2026). The definition does its work through its

domestic side, and the order does not state what that side requires. (A-5) asks "what facts should DOE consider when determining whether an article is manufactured, produced, or assembled in the United States?" 91 FR at 57325. The domestic side should be stated as a test with countable content, in the rules the Department publishes under § 3(b), which directs that the Secretary "shall publish rules or regulations implementing the authorities delegated ... as needed."

Recommendation. Define the domestic side of § 5(c) by two elements that must both be satisfied:

1. Manufacture of the end product in the United States at an identified site, stated by name, city, and State.

2. Domestic components exceeding a stated share of the cost of components computed under 48 CFR 25.003.

The order states three ways an article can be domestic. Nothing in this recommendation reads any of them out. It states what documentary content each requires, so that "assembled in the United States" is a fact a party can show rather than a label it can apply. A rule that gives the words content is not a rule that narrows them.

A share is already stated for one of the categories the order names in § 5(b), in a Federal definition built on the same two words. That share is stated in DA 26-870, released by the Commission's Public Safety and Homeland Security Bureau on August 20, 2026 on the Department of War's Second Power Inverter National Security Determination of August 19, 2026. It defines "Foreign-produced power inverters" to cover power inverters "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." DA 26-870 (PSHSB rel. Aug. 20, 2026). The definition that provision applies is stated at 48 CFR 25.003, which carries the percentage schedule. Gatewell recommends the same shares. It recommends the § 45X route as a stated alternative for the equipment classes § 45X covers, and notes two facts the Department should resolve on

the record before adopting it. § 45X carries no domestic-content floor of its own, and what operations qualify as "production" under § 45X for this purpose is not settled.

The reason is documentary. A percentage of a defined denominator is computed from records the manufacturer already holds: purchase invoices, customs entries, and its own cost build-ups. "Component means an article, material, or supply incorporated directly into an end product." 48 CFR 25.003. Cost of components is, for components the contractor purchases, "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)," and, for components the contractor manufactures, "all costs associated with the manufacture of the component ... plus allocable overhead costs, but excluding profit." Id. The same section closes the fraction at the end product. "Cost of components does not include any costs associated with the manufacture of the end product." Id. That regulation defines neither "manufactured" nor "manufactured in the United States," which is why the site element is stated separately.

The effect is convergence. A grid-connected inverter within the order's "bulk-power system," a term § 5(a) defines to include "transmission lines rated at 69,000 volts (69 kV) or more" and to exclude "facilities used in the local distribution of electric energy," would face one origin test at two agencies, and one evidence file would answer both. Today a grid-connected inverter within both scopes can be foreign-produced under DA 26-870's definition and, on the face of § 5(c), not foreign-produced because it was assembled in the United States. That definition states a countable share and § 5(c) states none. Neither result follows from the other, and an origin conclusion reached under one should not be carried to the other. The Department's answer to (A-5) decides whether the two can be answered from one file.

Two alternatives are feasible and less good. A site-only test is administrable but reaches nothing inside the unit, and it is the arrangement segmentation and relabeling are built to satisfy. A share set without a stated denominator is not computable, because the same ratio can be built from different cost bases. The recommendation above is the pairing that is both computable and anchored.

Treatments requested by (A-5)(a)

(A-5)(a) asks how the Department should treat "final assembly, substantial transformation, domestic content, contract manufacturing, original design manufacturing, white-labeling, refurbishment, remanufacturing, repair, and incorporation of foreign critical components." 91 FR at 57325. The treatments follow from the two elements above.

1. **Final assembly.** Necessary and not sufficient. It locates the end product at an identified site, which is what the first element asks, and it carries no weight in the ratio, because 48 CFR 25.003 places the cost of manufacturing the end product outside the fraction. The second element is what keeps the first from resting on assembly alone. A domestic side resting on final assembly alone is what segmentation and relabeling are arranged to reach.

2. **Substantial transformation.** A customs concept used to determine an article's country of origin. It resolves to a judgment about the article rather than a count from records, and the Department should not adopt it as the test under § 5(c). A CBP origin ruling remains useful evidence of the operations a party represented were performed and where.

3. **Domestic content.** The cost test above, with end-product assembly, integration, design, and testing outside the fraction.

4. **Contract manufacturing, original design manufacturing, and white-labeling.** The place test runs on where the operations were performed, whoever performed them. The identity of the entity that performed each major stage is a separate fact and should be disclosed as such. (A-5)(b) asks about persons "owned by, controlled by, or subject to the jurisdiction or direction of a Covered Foreign Entity," 91 FR at 57325, which is a question about entities. § 5(c) is a question about place. In its own regime the Federal Communications Commission construes a different entity question, whether a device is "produced by" a listed entity, under "a totality-of-the-circumstances test that looks to substantial responsibility for or control over a device's design, development, manufacture, or assembly." FCC 26-50, Third Report and Order, 91 FR 57798 (Sept. 11, 2026). That approach is noted only to show that an entity inquiry can be stated without a bright line. No conclusion under one regime should be carried to the other.

5. **Refurbishment, remanufacturing, and repair.** Judged on the operations actually performed and on their component cost. Repair does not change an article's origin.

6. **Incorporation of foreign critical components.** The cost definition prices a component at one level and does not decompose it into its own inputs, which keeps the ratio countable from the manufacturer's records. What sits inside a domestic component is an entity question, answered by a named-entity screen run alongside the place test rather than folded into it.

III. Question (A-5)(c): The Records That Substantiate Country of Manufacture

(A-5)(c) asks "[w]hat records can manufacturers, importers, distributors, and purchasers reasonably provide to substantiate country of manufacture, production, or assembly?" 91 FR at 57325. The records below are offered as substance, with the minimum each should state:

1. **A costed bill of materials per model.** One line per part, naming the component manufacturer and not the distributor, the country of origin with multi-country lines split rather than merged, the supply channel as direct, distributor, or broker, the identifier of the supplier declaration on file, and the date origin was last confirmed.

2. **A concentration summary per model.** Percentage of total bill-of-materials value by country of origin, stating the valuation basis, the twelve-month period used, and the date computed.

3. **Supplier origin declarations executed one tier up.** The declaring supplier and its country, the part numbers covered, the production site or sites by name, city, and country, the site operator where it differs from the declarant, a contact for verification, an undertaking to give written notice within thirty days of any change of production site, and a signature with name, title, and date.

4. **A stated maximum age for age-sensitive records.** The published example uses twelve months for supplier declarations on deep-traced lines and for site attestations, and twenty-four months for photographic and production-flow

evidence. Attachment A, Gatewell Protocol for Origin Evidence v1.0 rev. 3, § 4.7.3 (Sept. 17, 2026).

5. **Site evidence for the end-product manufacturing location.** Production-flow records, dated photographs, and a site attestation.

6. **Purchase invoices and customs entries for imported components.**

7. **A calculation memorandum** tying the ratio to the bill of materials, stating the denominator, the lines treated as domestic, and the valuation basis.

8. **A gap record** for any line whose origin could not be determined, holding the inquiry made and the response or its absence. An undetermined line is reported as undetermined and is not counted as domestic.

9. **An officer attestation**, signed by an officer of the manufacturer, covering the file as of its revision date.

Confirmation method. A supplier statement can be confirmed against its source without anyone deciding whether the underlying origin conclusion is right. The reviewer, not the manufacturer, selects which declarations are confirmed. The reviewer obtains or corroborates the declarant's contact details independently of the manufacturer. The reviewer records what was confirmed and with whom. The published standard states one such rule, under which the reviewer confirms 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," with contact details "obtained or corroborated independently of the manufacturer." Attachment A, Gatewell Protocol for Origin Evidence v1.0 rev. 3, Part V (Sept. 17, 2026).

The schema for the bill of materials and the concentration summary is published as a JSON Schema and CSV template "dedicated to the public domain under CC0 1.0," and the standard's text is published under Creative Commons Attribution 4.0. Attachment A, Gatewell Protocol for Origin Evidence v1.0 rev. 3, Annex B (Sept. 17, 2026). Gatewell asks for no adoption, reference, or endorsement. The confirmation step above can be performed by the manufacturer's own internal audit function, by a purchaser conducting diligence, or by the Department, and nothing in it requires a designated reviewer.

IV. Question (A-2): Grid-Connected Inverters

(A-2) asks "[w]hat objective characteristics should DOE consider for utility-scale and other grid-connected inverters" among other categories. 91 FR at 57324. Objective characteristics for this category were stated in DA 26-870 in August 2026, and Gatewell recommends them rather than thresholds of its own. That definition has two limbs. The device "[c]hanges 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 it "[c]ontains, 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." DA 26-870 (PSHSB rel. Aug. 20, 2026).

Both limbs are answerable from documents. The utility-interactive limb refers to published sections of UL 1741, which a manufacturer's type-testing records address directly. The connectivity limb reaches a unit "designed, equipped, or configured to accept" a remote-communication component. Where the component is fitted it appears in the bill of materials. Where it is not, the capability is recorded in the schematic, the interface specification, and the product documentation. Gatewell recommends that the Department use these characteristics within the "bulk-power system" as § 5(a) defines it, transmission at 69 kV or more and not local distribution, so the category boundary reads the same at both agencies even where the two origin tests differ. Gatewell proposes no voltage, capacity, or criticality threshold of its own.

V. Question (A-6): Safeguards Against Segmentation, Relabeling, and De Minimis Arrangements

(A-6) asks respondents to "[d]escribe safeguards needed to prevent evasion through segmentation, relabeling, or de minimis arrangements." 91 FR at 57325. The safeguard is the cost-weighted test itself, held to invoice-level records and a named site. Kit assembly does not reach a share set at these levels, because the cost of manufacturing the end product sits outside the fraction under 48 CFR 25.003 while the imported kit sits inside it at acquisition cost. Relabeling does not survive a supplier declaration that names the production site by name, city, and country and the site operator where it differs from the declarant, confirmed with that declarant on contact details corroborated

independently of the manufacturer. Segmentation does not change what these records show, because the bill of materials names the component manufacturer rather than the distributor and records the supply channel, so the producing site is named no matter which related entity invoices the line. Whether those entities are themselves of concern is the separate entity question. De minimis aggregation should be permitted for passive commodity classes below a stated threshold and not otherwise. The published schema takes a related approach, permitting passive components to "be aggregated by commodity class with a single coo entry per class where no Annex D match exists." Attachment A, Gatewell Protocol for Origin Evidence v1.0 rev. 3, Annex B.1 (Sept. 17, 2026). A threshold stated by the Department would serve the same purpose.

VI. Conclusion

Gatewell asks the Department to do three things in the rules it publishes under § 3(b) of the order:

1. Define the domestic side of "foreign-produced" in § 5(c) by a countable test: manufacture of the end product in the United States at an identified site, and domestic components exceeding a stated share of the cost of components as defined at 48 CFR 25.003.

2. Align with DA 26-870 (PSHSB rel. Aug. 20, 2026) for grid-connected inverters: 65 percent of total component cost for items delivered through calendar year 2028 and 75 percent for items delivered from calendar year 2029, the levels and the transition year stated in DA 26-870, § 45X eligibility as the stated alternative, and that order's objective characteristics for the category within the "bulk-power system" as § 5(a) defines it.

3. State the documentary content that substantiates country of manufacture, production, or assembly, and a confirmation method under which the reviewer selects the declarations to be confirmed and corroborates the declarant's contact details independently of the manufacturer.

Each is a definitional or documentary statement of the kind § 3(b) contemplates, and none depends on facts outside a manufacturer's own records.

Respectfully submitted,

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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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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)**
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> **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).
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> **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.
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> **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 CC0 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.