

Federal Communications Commission

Prohibiting the Importation and Marketing of Certain Covered UAS and UAS Critical Components and Equipment Listed in Section 1709 of FY2025 NDAA

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Introduction

The Federal Communications Commission (FCC) has both the evidentiary record and statutory authority to prohibit the continued importation of several previously authorized products produced by Anzu Robotics.

Despite labeling itself as an American company whose products may comply with the National Defense Authorization Act (NDAA), Anzu Robotics appears to maintain a technology licensing agreement with Da-Jiang Innovations (DJI) to produce its Raptor-T series, a relationship that could allow its communications and video surveillance products to be added to the Covered List pursuant to Section 1709 of the FY2025 NDAA.

Moreover, Anzu Robotics publicly states in its corporate communications that several of its products are produced overseas despite the commission adding foreign-produced drones and their critical components to the Covered List in December 2025. The FCC has noted its legal authority to prohibit the continued importation and sale of previously approved covered equipment pursuant to the Secure Networks Act of 2019.

As such, to safeguard U.S. national security, the FCC should prohibit the continued importation and marketing of Anzu's Raptor-T drone (FCC ID 2BBYS-RAPTOR) and Raptor remote control (FCC ID 2BBYS-RRC01).

Anzu Robotics Maintains Ties to DJI and Sources Key Components Abroad

Anzu Robotics has a documented corporate relationship with DJI that, *prima facie*, falls under the remit of the commission's Covered List authorities as it relates to Section 1709 of the FY2025 NDAA. Moreover, Anzu Robotics has also publicly stated that its products incorporate components produced outside of the United States, expanding its vulnerability to being added to the Covered List.

DJI's stated relationship with Anzu Robotics appears to fall within the remit of Section 1709 of the FY2025 NDAA due to the structure of the firms' relationships to one another. DJI's corporate website, along with Anzu Robotics' corporate site, states that the firm maintains a "technology licensing agreement" with Anzu, a type of commercial arrangement explicitly mentioned in the statutory text as potential grounds for inclusion on the FCC's Covered List.¹ This is clear within Subsection C, part iii of Section 1709, which requires that "any entity to which the named entity

¹ "Get The Facts: DJI's Relationship with Anzu Robotics," *DJI ViewPoints*, August 29, 2024. (<https://archive.ph/p1oZY>); "FAQs," *Anzu Robotics*, accessed August 25, 2026. (<https://archive.ph/AjbLq>)

[DJI and Autel Robotics] has a technology sharing or licensing agreement” related to communications or video surveillance equipment be added to the Covered List.²

Moreover, Section 1709’s inclusion of technology-sharing and licensing agreements reflects a deliberate congressional choice to look beyond formal ownership or corporate identity. That approach is especially relevant where covered technology can continue reaching the U.S. market through a differently branded entity, foreign final assembly, or a licensing arrangement. As such, Anzu’s acknowledged reliance on licensed DJI technology therefore implicates the precise circumvention risk Congress sought to address.

Notably, Anzu Robotics does not contest that it maintains a licensing agreement with DJI, but, instead, notes its ties do not extend beyond its licensing relationship, that it does not produce drones in China, and that it maintains its own flight software and other proprietary technologies.³ On the “Frequently Asked Questions” section of its corporate website, Anzu notes that its licensing agreement with DJI regarding the Raptor-T series allows Anzu to “modify and manufacture this technology at will,” directly implicating both the “licensing agreement” and “technology sharing” aspects of Subsection C.⁴ Moreover, Anzu also directly acknowledges that its Raptor-T platform “may fall outside the parameters of the NDAA” due to the presence of a Chinese-produced thermal sensor embedded within the platform.⁵ These statements further highlight that both firms maintain a partnership that would offer a strong legal justification to place several of Anzu Robotics’ products on the Covered List.

Moreover, this partnership has likely extended to communications and video surveillance equipment, implicating Anzu’s Raptor-T platform. DJI notes that its arrangement with Anzu Robotics covers DJI’s Mavic 3 Enterprise platforms, a line of products which often contain, as part of their final assembly, both communications and video surveillance equipment currently on the Covered List.⁶ On its website, Anzu also notes that its thermal sensor for its Raptor-T platform, the same drone platform that is under license from DJI, is sourced from China, though does not identify the manufacturer.⁷ According to its specifications, however, the thermal imaging sensor shares several characteristics with DJI-produced thermal sensors — both the Raptor-T and DJI Mavic 3T are configured to carry a 640×512 LWIR radiometric payload.⁸

This analysis is strengthened by the other alleged instances of shared hardware and software ties between Anzu and DJI. A 2024 congressional letter to the Commerce Department alleged that

² Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025, Pub. L. 118-159, 138 Stat. 1773. (<https://www.congress.gov/bill/118th-congress/house-bill/5009/text>)

³ “FAQs,” *Anzu Robotics*, accessed August 25, 2026. (<https://archive.ph/AjbLq>)

⁴ *Ibid.*

⁵ *Ibid.*

⁶ “Get The Facts: DJI’s Relationship with Anzu Robotics,” *DJI ViewPoints*, August 29, 2024.

(<https://archive.ph/p1oZY>); “DJI Mavic 3 Enterprise Series,” *DJI*, accessed August 31, 2026.

(<https://archive.ph/yk5CA>)

⁷ “FAQs,” *Anzu Robotics*, accessed August 25, 2026. (<https://archive.ph/AjbLq>)

⁸ *Ibid.*; “DJI Mavic 3 Enterprise Series,” *DJI*, accessed August 25, 2026. (<https://archive.ph/yk5CA>)

Anzu's Raptor-T contained DJI-produced hardware, firmware, and software, including retaining the capacity to be decrypted by DJI security keys.⁹ In response, DJI claimed that Anzu Robotics was not "an affiliate" and that the two firms maintained a "technology licensing agreement," while Anzu claimed that its relationship with DJI complied with the law.¹⁰ The congressional claims were largely repeated in a lawsuit filed by the Texas state attorney general in February 2026, in which litigation remains ongoing.¹¹ As such, there is reasonable evidence to suggest that, not only does Anzu fall under the auspices of Section 1709 due to its licensing arrangement with DJI, but that its products also contain components that pose an unacceptable risk to U.S. national security.

Several of Anzu Robotics' other platforms also remain eligible for addition to the FCC's Covered List and prohibition from continued import and sale due to their incorporation of components produced outside of the United States without a conditional authorization. In December 2025, the FCC added all foreign-produced UAS and their critical components to the Covered List following a national security determination that such equipment posed an unacceptable risk to U.S. national security.¹² Under commission precedent, this decision can form the basis for either prohibiting the continued import and sale of previously issued equipment authorizations, as occurred in June 2026 targeting communication technologies added to the Covered List prior to 2024, or revoking equipment authorizations, as the FCC did in August against Odyssey Robot LLC for misleading the commission on its foreign manufacturing practices.¹³

These precedents, which the commission now proposes to apply in this case, would likely cover Anzu Robotics. Anzu notes on its own website that many of its components, including those used in its control systems, are produced in Malaysia before being imported to the United States for final sale.¹⁴ While Anzu also claims that certain software products related to its control systems are produced in the United States, this does not negate that its controller hardware is sourced

⁹ U.S. Congress, House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party, Letter to U.S. Secretary of Commerce Gina Raimondo, August 20, 2024.

(<https://chinaselectcommittee.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/2024-08-20%20-%20DOC%20Anzu%20+%20Cogito%20Letter.pdf>)

¹⁰ "Get The Facts: DJI's Relationship with Anzu Robotics," *DJI ViewPoints*, August 29, 2024.

(<https://archive.ph/p1oZY>); Brad Dress, "Top lawmakers on China panel press US, drone company CEO on DJI threat," *The Hill*, August 27, 2024. (<https://thehill.com/policy/defense/4849978-house-china-committee-drone-concerns>)

¹¹ Petition, *State of Texas v. Anzu Robotics, LLC* (Tex. Dist. Ct., Collin County, filed February 18, 2026). (https://www.texasattorneygeneral.gov/sites/default/files/images/press/Petition_10.pdf)

¹² Federal Communications Commission, Public Notice, "Public Safety and Homeland Security Bureau Announces Addition of Uncrewed Aircraft Systems (UAS) and UAS Critical Components Produced Abroad, and Equipment and Services Listed in Section 1709 of the FY2025 NDAA, to FCC Covered List," December 22, 2025. (<https://docs.fcc.gov/public/attachments/DA-25-1086A1.pdf>)

¹³ Federal Communications Commission, Public Notice, "FCC Prohibits Importation and Marketing of Certain Covered Equipment," June 26, 2026. (<https://www.fcc.gov/document/fcc-prohibits-importation-and-marketing-certain-covered-equipment>); Federal Communications Commission, Order of Revocation, "FCC Revokes Equipment Authorizations Held By Odyssey Robot LLC," August 11, 2026. (<https://www.fcc.gov/document/fcc-revokes-equipment-authorizations-held-odyssey-robot-llc/attachment>)

¹⁴ "FAQs," *Anzu Robotics*, accessed August 25, 2026. (<https://archive.ph/AjbLq>)

from abroad, a feature that the commission cited as a key security risk in its December National Security Determination.¹⁵ Moreover, Anzu would likely be incapable of receiving a conditional approval to enter the American market without significant modifications to its corporate practices given both its documented ties to DJI and its reliance on foreign manufacturers.

Recommendations

The FCC maintains a strong statutory and legal basis to place select products produced by Anzu Robotics — particularly those registered under FCC IDs 2BBYS-RAPTOR and 2BBYS-RRC01 — on the Covered List and prohibit their continued importation and marketing within the United States.

Anzu’s documented relationship with DJI, an agreement that directly falls under the authorities outlined in Section 1709 of the FY2025 NDAA, explicitly offers grounds for the commission to list Anzu’s communications and video surveillance equipment. Moreover, Anzu’s publicly acknowledged reliance on foreign-produced UAS components, coupled with the FCC’s demonstrated willingness to prohibit the continued importation and sale of previously authorized equipment due to their Covered Listed components, offers another avenue for placing the firm’s other products on the Covered List.¹⁶

Taken together, these factors offer a clear justification for the commission to act against these products as part of its efforts to uphold its national security mandate.

¹⁵ Federal Communications Commission, Public Notice, “Public Safety and Homeland Security Bureau Announces Addition of Uncrewed Aircraft Systems (UAS) and UAS Critical Components Produced Abroad, and Equipment and Services Listed in Section 1709 of the FY2025 NDAA, to FCC Covered List,” December 22, 2025. (<https://docs.fcc.gov/public/attachments/DA-25-1086A1.pdf>)

¹⁶ Secure and Trusted Communications Networks Act of 2019, Pub. L. 116-124, 134 Stat. 158, codified as amended at 47 U.S.C. §§1601-1609. (<https://www.congress.gov/116/plaws/publ124/PLAW-116publ124.pdf>); Federal Communications Commission, Public Notice, “FCC Prohibits Importation and Marketing of Certain Covered Equipment,” June 26, 2026. (<https://www.fcc.gov/document/fcc-prohibits-importation-and-marketing-certain-covered-equipment>); Jack Burnham, “Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program,” *Foundation for Defense of Democracies*, August 7, 2026. (<https://www.fdd.org/analysis/2026/08/07/protecting-against-national-security-threats-to-the-communications-supply-chain-through-the-equipment-authorization-program-3>)