

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

In the Matter of

Public Safety and Homeland Security Bureau and Office of Engineering and Technology
Seek Comment on Prohibiting the Importation and Marketing of Certain Covered UAS
and UAS Critical Components and Equipment Listed in Section 1709 of FY2025 NDAA
(Public Notice, DA 26-832, rel. August 10, 2026)

PS Docket No. 26-184

COMMENTS OF GATEWELL GROUP LLC

I. Interest of the commenter

Gatewell Group LLC ("Gatewell") is a compliance consultancy based in Los Angeles, California, focused on manufacturers, importers, distributors, and institutional purchasers of connected equipment in categories subject to the Commission's Covered List. Gatewell publishes the Gatewell Protocol for Origin Evidence, an open, no-cost documentation standard for origin-evidence files. Gatewell has no relationship with Anzu Robotics, LLC, or with its affiliates, subsidiaries, or partners. These comments take no position on whether the proposed prohibition should issue. They address how a prohibition imposed under 47 CFR § 2.939(e) would be identified and operationalized by the parties who must comply with it — importers, distributors, marketplaces, and resellers in the distribution channel.

II. The enumerated FCC identifiers are the correct instrument, and the operative schedule should remain enumerated

Section 2.939(e)(1) requires that a public notice identify the affected devices "by class, type, or other description sufficient to identify the devices." The Public Notice satisfies that standard where it names FCC IDs 2BBYS-RAPTOR and 2BBYS-RRCo1. Gatewell supports that specificity.

The Public Notice also describes the proposed prohibition as reaching covered equipment produced by Anzu and its affiliates, subsidiaries, and other partners. A channel participant cannot operationalize that phrase. Whether an unnamed entity is a "partner" of a named producer is an investigative question that distributors and resellers are not positioned to answer, and answering it wrongly in either direction carries consequences: continued marketing of prohibited equipment, or withdrawal of lawful equipment from commerce.

Gatewell accordingly recommends that the Commission state that the enumerated FCC identifiers constitute the operative schedule for compliance purposes; that the schedule is exhaustive as of its date; and that additional identifiers attributable to affiliates, subsidiaries, or partners become subject to the prohibition only upon amendment of that schedule through this docket, with notice. This preserves the Bureau's reach while giving obligated parties a determinate list.

III. A scope limitation is invisible in the equipment authorization record, and should not be

This is the respect in which section 2.939(e) differs most consequentially from revocation, and it is the point Gatewell most urges the Commission to address.

Where an authorization is revoked under section 2.939(d), the Commission's equipment authorization records reflect the change, and a party checking an FCC identifier receives a signal. A scope limitation under section 2.939(e) produces no such signal: by design, the underlying authorization is not revoked and remains valid. The only check available to most channel participants — querying the FCC identifier in the Commission's equipment authorization system — will return an authorization in good standing for equipment that may no longer lawfully be imported or marketed.

The result is a false clear, delivered by the Commission's own records, to precisely the parties on whom the prohibition depends. Diligent actors will be misled. Sophisticated parties will know to look elsewhere. The practical burden falls hardest on smaller distributors and resellers without counsel monitoring this docket.

Gatewell recommends that the Commission annotate limited-scope authorizations in the equipment authorization system, in a machine-readable field, indicating that the

authorization is subject to an importation and marketing prohibition and citing the public notice that imposed it. This requires no change to the substantive rule and no additional showing by any party. It makes the prohibition self-executing at the point where compliance decisions are actually made.

IV. Parties holding lawfully imported inventory require a defined disposition path

The proposed prohibition reaches equipment already authorized, and therefore reaches inventory already lawfully imported and held. The Public Notice states that continued use and operation of already-purchased equipment is unaffected, which is a necessary clarification for end users. It does not address the position of a distributor or reseller holding stock on the effective date.

Gatewell recommends that any order state expressly whether inventory lawfully imported before the effective date may be sold through, and if so, on what schedule. A defined sell-through window, or an unambiguous statement that no sell-through is permitted, allows obligated parties to plan. Silence produces the outcome the Commission is least likely to intend: identical inventory treated differently by similarly situated firms according to the aggressiveness of their counsel.

V. Conclusion

Gatewell takes no position on whether the proposed prohibition should issue. If it does, the three measures above — an enumerated and exhaustive schedule, a machine-readable annotation of limited-scope authorizations, and a stated inventory disposition path — would allow the parties who must comply to do so mechanically, and would place the anchor of every compliance determination in the Commission's own records rather than in supplier representations.

Respectfully submitted,

/s/ Ilya Tsimerinov

Ilya Tsimerinov

Principal

Gatewell Group LLC

811 W 7th Street, Suite 900

Los Angeles, California 90017
inquiries@gatewellgroup.com

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