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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, with attribution. Comment period open through October 31, 2026.

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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 August 7, 2026.

PART I

Purpose and scope

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, and maintenance of an **Origin Evidence File** ("OEF") for connected equipment in categories subject to the Covered List — as of this version: unmanned aircraft systems and components, routers, power inverters, and advanced robotic devices. It is designed so that a regulator, certification body, insurer, or commercial counterparty examining the file can trace every origin claim to a source document, and so that the file survives the scrutiny it will only ever receive after something has gone wrong.

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.

Foreign-produced

As used in the applicable Covered List entry and its accompanying guidance for the category in question. 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.

Material change

Any event listed in Part VI (change control).

Qualified verifier

A party competent in supply-chain documentation and the Covered List regime, independent in judgment, who conducts the Annex F methodology and discloses any assistance it provided in assembling the file under examination.

Officer

A person with authority to bind the attesting entity and knowledge of, or verified reports covering, the facts attested.

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 Annex F with issued verification statement	Qualified verifier	12 months from verification date
3 · MONITORED	Level 2 + standing Part VI change control + annual re-verification	Qualified verifier	Continuous; lapses automatically if re-verification is missed

PART IV

The Origin Evidence File

4.1 Device identity

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.

4.2 Production provenance

Every site performing final assembly, principal subassembly, or firmware loading: legal operator, address, ownership or contractual relationship to the manufacturer, and the step performed. A production-flow narrative from major components to shipped unit. A signed site attestation from an officer of each operating entity.

4.3 Component origin

A bill of materials per model conforming to the Annex B schema, identifying country of origin per line item; deep-trace documentation (Annex C supplier declarations, one tier up) for every Annex D component present in the design.

4.4 Corporate provenance

The manufacturer's entity chain to its ultimate parents; beneficial ownership at ten percent or greater, with holder identity and jurisdiction; and a dated screen of all chain entities per the Annex E procedure.

4.5 Software and firmware provenance

An SBOM in SPDX or CycloneDX format for device firmware and companion applications; identity and location of build and code-signing infrastructure and its operator; update-server jurisdictions and operators; and a data-flow summary identifying every endpoint the device communicates with in normal operation, with operator and jurisdiction.

4.6 Attestation

The Annex A certification, signed by an officer of the manufacturer, covering the file as of its revision date.

PART V

Verification methodology (summary)

Level 2 and 3 verification follows Annex F: document authentication; reconciliation of the device schedule against public FCC authorization records; direct confirmation of not fewer than three verifier-selected supplier declarations; corporate-chain reconciliation against registry filings in each named jurisdiction; a fresh Annex E screen as of the verification date; and a written statement of what was examined and confirmed, the Protocol version applied, and the file revision covered. A verifier who assisted in assembling the file must disclose that assistance in the statement.

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, 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 ten-percent threshold;
5. Any Covered List addition or guidance change touching an entity, component, or category in the file.

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.

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 production site, component origin, corporate ownership, and software 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; and that the entity will re-attest affected sections within thirty days of any material change as defined in Part VI of the Protocol.

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

Signature: _____ Date: _____

Name: _____ Title: _____

ANNEX B

Bill-of-materials origin 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
supply_channel	Direct / distributor / broker	Broker-sourced deep-trace components require Annex C declaration regardless of tier
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.

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.

Declaring supplier: _____ Country: _____

Part numbers covered: _____

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

Site operator, if different from declarant: _____

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; navigation/perception sensors (LiDAR, vision modules, IMU); radio modules; 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.

ANNEX E

Covered-entity screening procedure

1. Assemble the screen list: every entity in the §4.4 corporate chain; every production-site operator in §4.2; every deep-trace component manufacturer in the §4.3 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.
3. Record for each screened entity: name as screened, aliases checked, 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 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: authenticated the documents comprising the file; reconciled the device schedule against public FCC authorization records; confirmed the following supplier declarations directly with the declaring suppliers: _____; reconciled the corporate chain against registry filings in each named jurisdiction; and re-ran the Annex E screen as of the verification date with the result: _____.

Exceptions, qualifications, and unresolved items:

Independence disclosure: the verifier [did / did not] provide consulting assistance in the assembly of this file. Nature of assistance, if any: _____

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.

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