

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
5046 Sierra Pines Drive
Mariposa, CA 95338
Phone: 1 800-500-4EMC (4362)
Fax: 209-787-5568
Email: tcbadmin@ckc.com



APP-FCC-A Covered List Attestation

Applicant Information

Company Name:	Therapy Holdings, Inc.
Contact Name:	Brian Krieger
Contact Title:	CEO
Company Address:	1816 SE 22 nd Ave, Portland OR 97214
Telephone No:	415 202 5300
Facsimile No:	N/A
Email Address:	admin@kgoal.com

Certification Type / Equipment Identification

Certification Program:	FCC Equipment Authorization / Radio Certification
Certification Number:	FCC ID 2A3MP-L3010

The equipment identified above ☐ is / ☒ is not "covered" equipment prohibited from receiving an equipment authorization pursuant to 47 CFR Part 2, Subpart J, §2.903.

The equipment identified above ☐ is / ☒ is not "covered" UAS equipment, including UAS critical components produced in a foreign country and communications and video surveillance equipment and services listed in Section 1709(a)(1) of the FY25 National Defense Authorization Act (Pub. L. 118-159).

The equipment identified above ☐ is / ☒ is not a "covered" router produced in a foreign country.

The applicant identified above ☐ is / ☒ is not identified on the FCC's "Covered List" as an entity, affiliate, or subsidiary which produces equipment on the "Covered List" or identified as an entity which has rebranded or relabeled equipment produced by entities identified on the "Covered List."

The software to be loaded prior to marketing of the equipment identified above ☐ is / ☒ is not "covered" software manufactured by any entity including predecessors, successors, parents, subsidiaries, or affiliates or any entity which has rebranded or relabeled the software produced by the entity(ies) identified on the "Covered List."

I hereby attest and certify that the above statements are true and correct.

Signature of Authorized Individual: ¹	<i>Brian Krieger</i>
Printed Name:	Brian Krieger
Title of authorized signature:	CEO
Date	6/1/2026

Note this attestation shall be signed by the applicant or their direct appointee within the same legal entity. A third party agent is not permitted to sign on behalf of the applicant.

¹ Signature is not subject to the FCC's authorized individual policy (KDB 852134) and may be signed by any appropriate company official.

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
5046 Sierra Pines Drive
Mariposa, CA 95338
Phone: 1 800-500-4EMC (4362)
Fax: 209-787-5568
Email: tcbadmin@ckc.com



Attachment A – Additional Information

The FCC’s “Covered List” includes certain “telecommunications equipment” and “video surveillance equipment” produced by specific manufacturers, their Affiliates or Subsidiaries and including any products produced by these entities which are rebranded or relabeled by other entities. (191, 184, 185, 188)² Furthermore, the Covered List items includes software produced or provided by specific manufacturers, their predecessors, successors, parents, subsidiaries, or affiliates and includes any software produced by these entities which is rebranded or relabeled by other entities.

The FCC claims under Section 2 of the Secure Networks Act that the identified equipment and/or software poses an unacceptable risk to United States national security.

Telecommunications Equipment (195):

Any equipment used in fixed or mobile networks that provides advanced communications service, provided the equipment includes or uses electronic components, as defined under section 1.50001(c).

Video Surveillance Equipment (205):

Any equipment that is used in fixed and mobile networks that provides advanced communications service in the form of a video surveillance service, provided the equipment includes or uses electronic components.

Advanced Communications Service (195, 205)

Any equipment that can be used in such a fixed or mobile broadband network to enable users to originate and receive high quality voice, data, graphics, and video telecommunications service using any technology with connection speeds of at least 200 kbps in either direction.

Affiliate (183):

An entity that (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another entity, where the term “own” means to have, possess, or otherwise control an equity interest (or the equivalent thereof) of more than 10 percent.

Subsidiary (184):

Any entity in which such named entity directly or indirectly (1) holds *de facto* control or (2) owns or controls more than 50% of the total voting power of the entity’s outstanding voting stock.

² Parenthetical references are citations of paragraph numbers in FCC Report and Order FCC 22-84 (ET Docket 21.232).

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
5046 Sierra Pines Drive
Mariposa, CA 95338
Phone: 1 800-500-4EMC (4362)
Fax: 209-787-5568
Email: tcbadmin@ckc.com



Additional Definitions

Router

The term Router is defined by National Institute of Standards and Technology's Internal Report 8425A to mean consumer-grade networking devices that are primarily intended for residential use and can be installed by the customer. Routers forward data packets, most commonly Internet Protocol (IP) packets, between networked systems.

UA (Uncrewed Aircraft):

For the purpose of this determination, the term "uncrewed aircraft (UA)" has the meaning found in 47 CFR 88.5: *An aircraft operated without the possibility of direct human intervention from within or on the aircraft.*

UAS (Uncrewed Aircraft System):

For the purpose of this determination, the term "uncrewed aircraft system (UAS)" has the meaning found in 47 CFR 88.5: *An Uncrewed Aircraft and its associated elements (including an uncrewed aircraft station, communication links, and the components not on board the UA that control the UA) that are required for the safe and efficient operation of the UA in the airspace of the United States.*

UAS Critical Components:

For the purpose of this determination, the term "UAS critical components" includes but is not limited to the following UAS components and any associated software:

- Data transmission devices
- Communications systems
- Flight controllers
- Ground control stations and UAS controllers
- Navigation systems
- Sensors and Cameras
- Batteries and Battery Management Systems
- Motors

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
5046 Sierra Pines Drive
Mariposa, CA 95338
Phone: 1 800-500-4EMC (4362)
Fax: 209-787-5568
Email: tcbadmin@ckc.com



Clarifications

Production Clarified:

The National Security Determination states that “[p]roduction generally includes any major stage of the process through which the device is made including manufacturing, assembly, design, and development.” In the equipment authorization process, applicants have to self-certify that any RF device is not “covered equipment.” Going forward, this includes self-certification that the RF device is not a router “produced in a foreign country.” Applicants seeking equipment authorization for any router will bear responsibility for certifying, in good faith, that any such router was not “produced in a foreign country.”

Router Requirements Clarified:

All “new” models of foreign-produced routers will not be eligible to receive FCC equipment authorization (unless they are granted Conditional Approvals by DoW or DHS) and therefore may not be imported or sold in the U.S.

Foreign-produced routers that have previously received FCC authorization (as shown by the FCC ID on the device) may continue to be imported, sold, and used in the U.S.

UAS Requirements Clarified:

“Uncrewed aircraft systems (UAS) and UAS critical components produced in a foreign country^{††}—except (a) [UAS](#) and [UAS critical components](#) included on the Defense Contract Management Agency’s (DCMA’s) [Blue UAS Cleared List](#), until January 1, 2027,[#] (b) UAS critical components that qualify as “domestic end products” under the Buy American Standard, [48 CFR 25.101\(a\)](#), until January 1, 2027; and (c) [devices which have been granted a Conditional Approval by DoW or DHS](#)—and all communications and video surveillance equipment and services listed in Section 1709(a)(1) of the [FY25 National Defense Authorization Act](#) (Pub. L. 118-159).”

In summary: any UAS or Critical Component produced in a foreign country is prohibited under the covered list except for UAS items listed on the BlueList, any UAS items meeting the Buy American Standard using the total value of all components for calculation of percentages, and devices having conditional approval.

The Buy American Standard exception persists only until January 1 2027.

Furthermore all communications and video surveillance equipment and services are prohibited, regardless of the above exception.

Non-UAS Items Clarified:

Devices and components marketed for general purpose (not UAS) are not subject to the UAS provisions of the covered list, even if a third party uses the equipment for such purpose, provided the manufacturer has not marketed the products for use in the UAS industry either directly or indirectly.

Example 1: A general purpose camera which is marketed for use in ROVs, UAVs, RC Cars and FPV applications of any kind is subject to the covered list prohibition.

Example 1: A general purpose camera which is marketed for use in a wide variety of applications (but remains exclusive of UAV applications) is not subject to the covered list prohibition.

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
5046 Sierra Pines Drive
Mariposa, CA 95338
Phone: 1 800-500-4EMC (4362)
Fax: 209-787-5568
Email: tcbadmin@ckc.com



Useful Links

FCC Covered List

<https://www.fcc.gov/supplychain/coveredlist>

47 CFR Part 2 Subpart J (including 2.903 and 2.911)

<https://www.ecfr.gov/current/title-47/chapter-I/subchapter-A/part-2/subpart-J>

FCC KDB System (and KDB 986446 on Covered List):

<https://apps.fcc.gov/oetcf/kdb/index.cfm> (Main KDB Page)

<https://apps.fcc.gov/oetcf/kdb/forms/FTSSearchResultPage.cfm?id=325672&switch=P>

FCC Report and Order 22-84 (Origin of the Covered List)

<https://docs.fcc.gov/public/attachments/FCC-22-84A1.pdf>

FCC Public Notices on Routers

<https://docs.fcc.gov/public/attachments/DA-26-278A1.pdf>

<https://docs.fcc.gov/public/attachments/DA-26-286A1.pdf>

FCC Public Notices on UAS

<https://docs.fcc.gov/public/attachments/DA-25-1086A1.pdf>

<https://docs.fcc.gov/public/attachments/DA-26-253A1.pdf>

FY25 National Defense Authorization Act (Pub. L. 118-159)

<https://www.congress.gov/118/plaws/publ159/PLAW-118publ159.pdf>

FCC FAQ Pages

<https://www.fcc.gov/covered-list-faqs-uas-and-uas-critical-components>

<https://www.fcc.gov/faqs-recent-updates-fcc-covered-list-regarding-routers-produced-foreign-countries>