

CKC Certification Services, LLC

CB: US0103; NB/AB: 0976
 5046 Sierra Pines Drive
 Mariposa, CA 95338
 Phone: 1 800-500-4EMC (4362)
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APP-FCC-A

Covered List Attestation

Applicant Information	
Company Name:	Coroflo Ltd.
Contact Name:	Jamie Travers
Contact Title:	CTO
Company Address:	DCU:Innovate Hub, Glasnevin, Dublin 11, D11 KXN4 Ireland
Telephone No:	+353 85 7379866
Facsimile No:	N/A
Email Address:	jamie@coroflo.com
Equipment Identification	
Certification Program:	FCC Equipment Authorization / Radio Certification
Certification Number:	2BX7G-C01

Declaration	Declared Statement
Confirmed	The applicant identified above <u>is not</u> 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."
Confirmed	The equipment identified above <u>is not</u> "covered" equipment
Confirmed	The equipment identified above <u>is not</u> "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).
Confirmed	The equipment identified above <u>is not</u> a "covered" router produced in a foreign country.
Confirmed	The software to be loaded prior to marketing of the equipment identified above <u>is not</u> "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."
Confirmed	The equipment identified above <u>is not</u> a foreign-produced bi-directional power inverter which contains components for remote communication. ¹
Confirmed	The equipment identified above <u>is not</u> a foreign-produced advanced robotic device. ¹

Covered entities, covered equipment (categories or devices) and covered software installed on equipment at time of sale are prohibited from receiving an equipment authorization pursuant to 47 CFR Part 2, Subpart J, §2.903.

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

Signature of Authorized Individual: ²	
Printed Name:	Jamie Travers
Title of authorized signature:	CTO
Date	09/09/2026

¹ Equipment granted conditional approval can mark affirmative and applicant shall supply conditional approval letter.

² Signature is not subject to the FCC's authorized individual policy (KDB 852134) and may be signed by any appropriate company official.

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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.

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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)³ 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.

³ Parenthetical references are citations of paragraph numbers in FCC Report and Order FCC 22-84 (ET Docket 21.232).

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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

Power Inverter:

For the purpose of this determination, the term "power inverter" shall mean a device which a) is a bi-directional power device or system that converts direct current electricity to alternating current electricity, or converts alternating current electricity to direct current electricity (to include microinverters, string inverters, central inverters, and hybrid (battery-based) inverters); and contains components that enable remote communication, control, sensing, data-collection, or monitoring through Wi-Fi, cellular, Bluetooth, or other similar connections.

Foreign-Produced:

For the purpose of this determination, 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).

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Advanced Robotic Devices:

For the purpose of this determination, the term “advanced robotic devices” means:

(A) 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; and
- iii. The combined weight of the device and, if applicable, ground station or docking station is over 4.4lbs; and
- iv. Contains a component falling within each of the below subparagraphs:
 - a. a sensor capable of perceiving its environment;
 - b. 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
 - c. 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; and

(B) Does not include:

- i. A “connected vehicle,” as that term is defined in 15 CFR § 791.301, but including a connected vehicle of any gross weight;
- ii. A vehicle operated only on a rail line;
- iii. An “uncrewed aircraft” or “uncrewed aircraft system,” as defined in 47 CFR § 7 88.5;
- iv. An unmanned underwater vehicle that is able to operate without a human occupant;
- v. Items that are 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 (such as canes, crutches, walkers, and wheelchairs), whether or not powered, and whether the item was cleared under section 510(k), approved under section 515, classified under section 513(f)(2), or exempt from premarket notification; and
- vi. A fixed, stationary, non-mobile robot, including articulating, parallel/delta, Cartesian/gantry, or Selective Compliance Assembly, or Articulated, Robot Arm (SCARA) robots intended for industrial or medical use.

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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.

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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>

48 CFR Part 25 (Buy American Supplies)

<https://www.ecfr.gov/current/title-48/chapter-1/subchapter-D/part-25/subpart-25.1/>

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>

FCC Public Notice on power inverters

<https://docs.fcc.gov/public/attachments/DA-26-786A1.pdf>

FCC Public Notice on advanced robotics

<https://docs.fcc.gov/public/attachments/DA-26-786A1.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>

<https://www.fcc.gov/covered-list-faqs-robots-inverters>