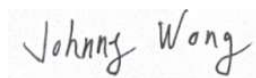


SHANTOU ZEGAN TECHNOLOGY CO., LIMITED

A device is considered a Toy Drone only if it meets all of the below criteria:

- Maximum Take-off Weight is equal to or less than 150 grams;
Yes, Weight is 48g.
- Operation is limited to line-of-sight operations equal to or less than 100 meters;
The operating distance is 70 meters
- Maximum sustained altitude must be equal to or less than 300 feet;
Maximum height: 50 meters
- No GPS/GNSS or equivalent system (e.g., no return-to-home, waypoint missions, or subject tracking);
No GPS/GNSS
- No connectivity or network capability (e.g., no connection to Internet, mobile apps, cellular networks, Wi-Fi), but may include a dedicated radio-frequency link between controller and drone, typically on 2.4 GHz or 5.8 GHz bands; o Radio frequencies and WiFi Channels may not be modifiable or programmable and must conform to FCC regulatory requirements;
Only 2.4GHz band. No wifi channels
- No imaging or sensing capabilities (e.g., no photo/video camera, microphones, live video feed, onboard recording, or sensors capable of surveillance or data gathering on the toy);
no photo/video camera, microphones
- Flight time must be equal to or less than 10 minutes;
The flight time is 7.5 minutes
- Maximum horizontal speed must be equal to or less than 10 meters/second;
Yes, less than 10m/s
- Explicitly marketed as a toy for recreational use;
Yes
- No modular payload interface, such as airdrop and release mechanisms, searchlights and strobes, and micro-FPV cameras and protection cages;
Yes, No modular payload interface
- Does not contain brushless motors; and
yes
- Is not produced by an entity identified in Section 1709 of the Fiscal Year 2025 National Defense Authorization Act.
Yes



Johnny Wong

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