

FCC Foreign Adversary Control Order Takes Effect June 9, Reporting Process and Deadlines Still Pending

April 13, 2026

On April 10, 2026, the Federal Communications Commission (FCC or Commission) published a Report and Order (Order) in the Federal Register that categorizes virtually all entities holding FCC licenses and authorizations “based on risk to national security” and subjects them to varying attestation and disclosure requirements. Accordingly, the Order will take effect on June 9, 2026.

As we discussed in greater detail here, the new rules adopted in the Order consider an entity to be under “Foreign Adversary Control” if it is “owned by, controlled by, or subject to the jurisdiction or direction of” a “foreign adversary,” with “ownership” defined to include voting or equity interests as low as 10%. If an entity certifies that it is subject to Foreign Adversary Control, the Order requires that it disclose all equity and/or voting interest holders who directly or indirectly hold a 5% or greater interest, among other required information. The Order also establishes ongoing reporting requirements, a process for filing Foreign Adversary Control attestations and disclosures, and enforcement policies and procedures for non-compliance, while making clear that failure to comply can result in penalties up to and including license revocation.

Although the Order takes effect on June 9, 2026, the core of the new rule, which requires FCC licensees to submit foreign adversary control attestations and ownership disclosures—47 C.F.R. § 1.80003—is delayed indefinitely until the Office of Management and Budget completes its review under the Paperwork Reduction Act, and the Office of Economics and Analytics and the Public Safety and Homeland Security Bureau announce a compliance date.

Authors

Eve Klindera Reed
Partner

202.719.7404
ereed@wiley.law

Wayne D. Johnsen
Partner

202.719.7303
wjohnsen@wiley.law

Daniel P. Brooks
Partner

202.719.4183
dbrooks@wiley.law

Edgar Class
Partner

202.719.7504
eclass@wiley.law

Stephen J. Conley
Associate

202.719.4572
sconley@wiley.law

Jackson McNeal
Associate

202.719.4766
jmcneal@wiley.law

Kevin T. Nguyen
Associate

202.719.3395
knguyen@wiley.law

Anthony M. Paranzino
Associate

202.719.3438
aparanzino@wiley.law

Practice Areas

Wiley's Telecom, Media & Technology, National Security, and Privacy, Cyber & Data Governance practitioners can help navigate these evolving issues. If you have questions about the Order, please contact one of the authors of this alert.

Communications Enforcement &
Compliance
National Security
Privacy, Cyber & Data Governance
Telecom, Media & Technology