

ALERT

FCC Revises Guidance on Consumer-Grade Routers Added to Covered List

April 1, 2026

On March 31, 2026, the Federal Communications Commission (FCC) published revisions to its FAQs on Recent Updates to FCC Covered List Regarding Routers Produced in Foreign Countries, providing additional context and explanation for certain issues raised by the addition of foreign-produced consumer-grade routers. As covered in a previous Wiley alert, on March 23, 2026, pursuant to a National Security Determination (NSD) dated March 20, 2026, the FCC published a Public Notice adding all foreign-produced consumer-grade routers to its Covered List of communications equipment and services deemed to pose an unacceptable risk to U.S. national security.

The revisions to the FCC's FAQs, discussed more fully below, provide important clarifications for companies on the scope and applicability of the FCC's addition of consumer-grade routers to the Covered List, as well as other issues related to the Conditional Approval process for foreign-produced consumer-grade routers and entity-level Covered List considerations raised by the Public Notice.

Clarification on Scope of "Covered" Routers. Through the updated FAQ, the FCC provides guidance explaining that:

- Routers intended for use in "exclusively [] industrial, enterprise, or military contexts" are not considered "covered" equipment, citing to the NSD's definition of "routers," as "consumer-grade networking devices that primarily intended for **residential use and can be installed by the customer**" (emphasis added).
- Cellphones with mobile hot spot features are not considered "covered" equipment following the addition of foreign-produced routers to the Covered List, as such devices "are not

Authors

Joshua S. Turner
Partner
202.719.4807
jturner@wiley.law

Sara M. Baxenberg
Partner
202.719.3755
sbaxenberg@wiley.law

Jackson McNeal
Associate
202.719.4766
jmcneal@wiley.law

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the focus of the [NSD] or of the National Institute of Standards and Technology report that [the NSD] cites.”

- In general, foreign-produced routers intended for residential use are considered “covered” equipment, even if that equipment is installed by a professional engineer or by an internet service provider (ISP).
- Integrated residential gateways provided by ISPs that combine router and modem functions in a single device fall within the scope of the NSD and are considered “covered” equipment.
- No list exists of routers that qualify as “covered” under the NSD, noting that the NSD identification only exempts foreign-produced routers that have received a Conditional Approval from the Department of War or the Department of Homeland Security, and that such routers will be specifically identified on the FCC’s Covered List website.

Clarification on Other Covered List Issues Raised by the Public Notice. In addition, the revised FAQ clarifies certain issues specific to the approval process for “covered” routers, and the interaction between their addition and the Covered List more generally. Specifically, the revised FAQ explains that:

- Any entity that engages in “any major stage of the process through which a device is made, including manufacturing, assembly, design, and development” may apply for Conditional Approval of a “covered” router, citing to the NSD.
- Applicants may seek an entity-level Conditional Approval, covering multiple different models or types of routers, citing to Annex A of the NSD.
- An entity producing routers in a foreign country is **not** considered a “covered” entity for purposes of the FCC’s rules as a result of the addition of consumer-grade routers, citing back to the Public Notice, which clarifies that the addition of consumer-grade routers to the Covered List does not implicate FCC rules and programs “applicable to entities identified on the ‘Covered List’” because the newly added routers are identified “by place of production, not by entity.”