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Via Electronic Filing

June 4, 2026

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: FCC's Public Safety and Homeland Security Bureau Announces Addition of Routers Produced in Foreign Countries to FCC Covered List – DA 26-278, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233

Dear Ms. Dortch:

On June 2, 2026, David Grossman, Mike Bergman, and Rachel Nemeth of Consumer Technology Association® (CTA)¹ met with Alice Jou, Matteo Dunn, and Katherine Nevitt of the Office on Engineering and Technology (OET), and Jim Schlichting of the Public Safety and Homeland Security Bureau (PSHSB). The purpose of the meeting was to discuss the FCC's recent placement of foreign-made consumer-grade routers on the Covered List² and how the Commission is determining what type of products are in scope.

CTA supports the Administration's goal to protect U.S. networks from equipment and services deemed to pose an unacceptable threat to national security. To effectively address these security concerns, the FCC must clearly define the scope of the consumer equipment at issue.

When the FCC announced the addition of routers produced in foreign countries to the Covered List, it relied on the following definition from the National Security Determination (NSD) issued on March 20, 2026:

¹ As North America's largest technology trade association, CTA® is the tech sector. Our members are the world's largest innovators—from startups to global brands—helping support more than 17 million American jobs. CTA owns and produces CES®—the most powerful tech event in the world.

² *FCC's Public Safety and Homeland Security Bureau Announces Addition of Routers Produced in Foreign Countries to FCC Covered List*, Public Notice, DA 26-278, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233 (rel. Mar. 23, 2026) (Public Notice).

*For the purpose of this determination, the term “Routers” is defined by National Institute of Science and Technology’s Internal Report 8425A to include 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.*³

While CTA appreciates that the Commission continues to clarify the scope of products covered by the prohibition,⁴ we are concerned about potential interpretations of the definition that could widen the scope of products subject to the Covered List.

CTA has worked closely with government and industry partners to enhance ecosystem-wide security by championing the U.S. Cyber Trust Mark. This program is valuable because it gives consumers a simple, credible way to identify connected devices that meet baseline cybersecurity standards, helping them make more informed purchasing decisions. It also strengthens broader U.S. cybersecurity and national security goals.

CTA appreciates the Commission’s willingness to engage on these issues, and we look forward to continued collaboration with federal partners to ensure trusted technology providers can meet consumers’ needs in a manner that promotes U.S. security goals.

Pursuant to Section 1.1206 of the FCC’s rules, this letter is being electronically filed with the Commission.⁵ Please contact the undersigned if you have any questions regarding this filing.

Respectfully submitted,

/s/ Rachel Nemeth

Rachel Nemeth

Vice President, Regulatory & Government Affairs

/s/ J. David Grossman

J. David Grossman

Vice President, Policy & Regulatory Affairs

/s/ Mike Bergman

Mike Bergman

Vice President, Technology & Standards

³ See *National Security Determination on the Threat Posed by Routers Produced by Foreign Countries* (rel. Mar. 20, 2026) at pg. 4; <https://www.fcc.gov/sites/default/files/NSD-Routers0326.pdf>.

⁴ CTA expressed its appreciation for the FCC’s continued work in this regard, including ongoing updates to the FAQs FCC, *FAQs on Recent Updates to FCC Covered List Regarding Routers Produced in Foreign Countries* (updated May 12, 2026), <https://www.fcc.gov/faqs-recent-updates-fcc-covered-list-regarding-routers-produced-foreign-countries>.

⁵ 47 C.F.R. § 1.1206.

cc (via email): Alice Jou
Matteo Dunn
Katherine Nevitt
Jim Schlichting