



Federal Communications Commission
Washington, D.C. 20554

June 10, 2026

**VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED
AND EMAIL AT contact@flyondrone.com**

Odyssey Robot LLC
21 Miller Alley Suite 210
Pasadena, CA 91103

C/o
Randolph Howard Eason
Agent for Service of Process
21 Miller Alley Suite 210
Pasadena, CA 91103

Re: File No. EB-SED-26-00040950

Dear Sirs:

The Enforcement Bureau (Bureau) of the Federal Communications Commission (FCC or Commission) is investigating whether Odyssey Robot LLC (Odyssey or Company)¹ has directly or indirectly marketed² within the United States any radiofrequency (RF) equipment³ produced in a manner that may be a violation of the Communications Act of 1934, as amended (Act), including section 302a(b) of the Act, and parts 1 and 2 of the Commission's rules.⁴ The Federal Government has determined that certain equipment and services pose an unacceptable threat to the national security of the United States or the security and safety of United States persons.⁵ Consequently, on December 22, 2025, the

¹ "Company" shall mean Odyssey Robot LLC and any predecessor-in-interest, affiliate, wholly or partially owned subsidiary, and all owners, including but not limited to, partners or principals, and all directors, officers, employees, or agents, including consultants and any other persons working for or on behalf of the foregoing at any time during the period covered by this letter of inquiry (LOI). Although this LOI refers to the Company to collectively include each person or entity listed in this definition, any responses must specifically detail and distinguish between the actions or responsibilities of each entity.

² For purposes of this LOI, the terms "market," "marketed," or "marketing" shall mean the manufacture, use, sale or lease, or offering for sale or lease, including advertising for sale or lease, or importation, shipment, or distribution for the purpose of selling or leasing or offering for sale or lease. See 47 U.S.C. § 302a(b); 47 CFR § 2.803(a). "Market," "marketed," or "marketing" includes the Company's efforts to sell devices on its own websites, on third-party websites, and to resellers who may sell the products elsewhere.

³ "RF equipment" includes radiofrequency devices satisfying the definition set forth in 47 CFR § 2.801.

⁴ 47 U.S.C. §§ 151, 302a(b); 47 CFR parts 1 and 2.

⁵ See Public Safety and Homeland Security Bureau Announces Addition of Uncrewed Aircraft Systems (UAS) and UAS Critical Components Produced Abroad, and Equipment and Services Listed in Section 1709 of the FY2025 NDAA, to FCC Covered List, Public Notice, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, DA 25-1086 (PSHSB Dec. 22, 2025) (UAS December Public Notice); National Security Determination on the Threat Posed by Uncrewed Aircraft Systems (UAS) and UAS Critical Components Produced in Foreign Countries (rel. Dec. 21, 2025), available at <https://www.fcc.gov/sites/default/files/National-Security-Determination-for-UAS.pdf> (last visited June 9, 2026) (Dec. 21, 2025 National Security Determination); Servicemember Quality of Life Improvement and National Defense Authorization Act for Fiscal Year 2025, Pub. L. No. 118-159, § 1709(b), 138 Stat. 1773, 2215 (2024) (FY25 NDAA); see also Public Safety and Homeland Security Bureau Announces

Commission's Public Safety and Homeland Security Bureau placed on the FCC Covered List:⁶ 1) unmanned aircraft systems (UAS) and UAS critical components⁷ produced in a foreign country, and 2) all communications and video surveillance equipment and services listed in Section 1709(a)(1) of the FY25 NDAA, including all such equipment produced by Shenzhen Da-Jiang Innovations Sciences and Technologies Company Limited (DJI Technologies) and Autel Robotics.⁸

The Bureau is investigating whether models of RF equipment marketed by the Company within the United States comply with recently enacted regulations. Accordingly, **we direct the Company, pursuant to sections 4(i), 4(j), and 403 of the Act,⁹ to provide the equipment, information, and documents requested herein within fourteen (14) calendar days** after the date of this letter of inquiry (LOI).

Pursuant to section 2.945 of the Commission's rules, the **Bureau directs the Company to provide a voucher for the Model Number YMAWZOD and Model Number FMAWZOD** to be obtained from the marketplace, to determine the extent to which production of such equipment continues to comply with the data filed by the applicant or on file with the responsible party for equipment subject to Supplier's Declaration of Conformity.¹⁰ The voucher must be provided within **fourteen (14) calendar days** after the date of this LOI.¹¹

This LOI constitutes an order of the Commission to produce the documents and information requested herein.¹² To knowingly and willfully make any false statement or conceal any material fact in

Conditional Approval of Certain Uncrewed Aircraft Systems (UAS) and UAS Critical Components and Exemption from FCC Covered List, Public Notice, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, DA 26-253 (PSHSB Mar. 18, 2026); Public Safety and Homeland Security Bureau Announces Exemption of Certain Uncrewed Aircraft Systems (UAS) and UAS Critical Components From FCC Covered List, Public Notice, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, DA 26-22 (PSHSB Jan. 7, 2026); Secure and Trusted Communications Networks Act of 2019, Pub. L. 116-124, 133 Stat. 158 (2020) (codified as amended at 47 U.S.C. § 1601–1609) (Secure Networks Act); John S. McCain National Defense Authorization Act of 2019, Pub. L. 115-232, 132 Stat. 1636 (2018). Fact sheets and other documents regarding Covered List equipment, including UAS exemptions, are available on the Commission's website at <https://www.fcc.gov/supplychain/coveredlist> (updated Mar. 18, 2026).

⁶ See UAS December Public Notice; see also 47 U.S.C. § 1601; 47 CFR § 1.50002.

⁷ UAS critical components include but are not limited to data transmission devices, communications systems, flight controller, ground control stations and UAS controllers, navigation systems, sensors and cameras, batteries and battery management systems, and motors. See UAS December Public Notice at Appendix B.

⁸ Communications or video surveillance equipment or services produced by DJI Technologies and Autel Robotics includes any such equipment and service that is produced through a subsidiary, affiliate, partnership, joint venture, technology sharing agreement, or licensing agreement. See FY25 NDAA, § 1709(a).

⁹ 47 U.S.C. §§ 154(i)-(j), 403.

¹⁰ 47 CFR § 2.945(b)(1).

¹¹ 47 CFR § 2.945(b)(5).

¹² See 47 U.S.C. § 155(c)(3).

reply to this inquiry is punishable by fine or imprisonment.¹³ **Failure to provide a timely and complete response to this LOI constitutes a violation of the Act and the Commission's rules.**¹⁴

The Attachment to this letter includes the inquiries, filing requirements, and instructions for the Company's response. Requests for confidential treatment or claims of attorney-client privilege or attorney work product must strictly meet the requirements stated in the attached instructions.

Meet and Confer: If the Company intends to raise any issues regarding the scope, cost, burden, or response time for this LOI, or if it has questions regarding how to assert any claims of protected status (e.g., privilege, work-product, etc.) or the production of electronically stored information, it must notify Bureau personnel within two (2) business days of receipt of this LOI to schedule a telephonic meeting. At the meeting, the Company must make available personnel knowledgeable about the Company's information or records management systems, systems for electronically-stored information, custodians likely to have information responsive to this LOI, and any other issues relevant to compliance with this LOI.

¹³ See 18 U.S.C. § 1001; see also 47 CFR § 1.17; 47 U.S.C. § 502.

¹⁴ See 47 U.S.C. § 503(b)(1)(B); see also *Aura Holdings of Wisconsin, Inc.*, Notice of Apparent Liability for Forfeiture, 33 FCC Rcd 3688, 3696, para. 21 (2018), *forfeiture order issued*, 34 FCC Rcd 2540 (2019) (imposing a \$19,693 penalty for failure to respond to LOI); *ABC Fulfillment Services LLC d/b/a HobbyKing USA LLC and HobbyKing.com, and Indubitably, Inc. d/b/a/ HobbyKing Corp., HobbyKing USA LLC, HobbyKing and HobbyKing.com*, Notice of Apparent Liability for Forfeiture, 33 FCC Rcd 5530 (2018), *aff'd*, Forfeiture Order, 35 FCC Rcd 7441 (2020), *recon. denied*, Memorandum Opinion and Order, 36 FCC Rcd 10688 (2021) (imposing a \$39,278 forfeiture for failure to respond to LOI); *Net One Int'l, Net One, LLC, Farrahtel Int'l, LLC*, Forfeiture Order, 29 FCC Rcd 264, 267, para. 9 (EB 2014), *recon. denied*, Memorandum Opinion and Order, 30 FCC Rcd 1021 (EB 2015) (imposing a \$25,000 penalty for failure to respond to LOI); *Conexions, LLC d/b/a Conexion Wireless*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Rcd 15318, 15325, para. 22 (2013) (proposing a \$300,000 forfeiture for failure to provide timely and complete responses to an LOI); *Technical Commc'n Network, LLC*, Notice of Apparent Liability for Forfeiture and Order, 28 FCC Rcd 1018, 1020, para. 8 (EB 2013) (proposing a \$25,000 forfeiture for failure to provide a complete response to an LOI); *SBC Commc'ns, Inc.*, Forfeiture Order, 17 FCC Rcd 7589, 7600, para. 28 (2002) (imposing \$100,000 penalty for failing to submit a sworn written response).

Odyssey Robot LLC

June 10, 2026

Page 4 of 11

If the Bureau determines that the Company has violated or has continued to act in violation of the Act and/or the Commission's rules, the continued noncompliant conduct after the receipt of this LOI may subject the Company to additional penalties.

If you have any questions about this matter, please contact me at EB-SED-Response@fcc.gov.

Sincerely,

**ELIZABETH
MUMAW**

Digitally signed by
ELIZABETH MUMAW
Date: 2026.06.10 08:35:23
-04'00'

Elizabeth Y. Mumaw
Division Chief
Spectrum Enforcement Division
Enforcement Bureau

Attachment

ATTACHMENT

Inquiries: Information and Documents to be Provided

The Company must provide the following information and documents as requested below in accordance with the Filing Requirements and Instructions below.

When this LOI instructs the Company to identify a Person,¹⁵ the Company must provide: the individual's full legal name, job title (if any), current principal business address, phone number, and e-mail address. If a principal business address or telephone number is unavailable, provide the individual's home address and telephone number.

When this LOI instructs the Company to identify an entity other than a Person, the Company must provide the entity's full name, current or last known principal business address, current or last known principal business telephone number, and e-mail address.

When this LOI instructs the Company to identify a Document,¹⁶ the Company must provide the following information: the Document's date, author, addressee, type of document, a brief description of the subject matter, its current or last known location, and its custodian.

Unless otherwise indicated, the time period covered by these inquiries is December 1, 2025, to the present (Inquiry Period).

Requests for Information

Company Information and Business Structure:

1. Describe the current business structure (e.g., corporation, sole proprietorship, partnership, limited liability company, etc.) of the Company. Give the date and location of its incorporation or registration.
2. Provide a detailed overview of the Company, including the Company's history, mission, operations (including location), revenue structure, and the products and services it offers.
3. Provide all "fictitious" names under which the Company has operated (e.g., all "doing business as," "also known as," trade names, brand names, etc.), and the States and/or foreign countries where the Company is authorized to do business or otherwise uses those names.

¹⁵ "Person" means, but is not limited to, an individual, partnership, association, joint-stock company, trust, or corporation. A "Person" shall include any natural person or any non-natural person, including but not limited to a business, company, corporation, enterprise, institution, organization (educational, religious, or otherwise), partnership, proprietorship, or any other entity, whether for-profit or non-profit and whether of general or limited liability and all of such non-natural person's advisers, agents, consultants, directors, employees, members, officers, owners, partners, principals, representatives, and any other persons working for or on behalf of the foregoing.

¹⁶ "Document" shall mean the complete original (or in lieu thereof, exact copies of the original) and any non-identical copy (whether different from the original because of notations on the copy or otherwise), regardless of origin or location, of any taped, recorded, transcribed, written, typed, printed, filmed, punched, computer-stored, electronically-stored, or graphic matter of every type and description, however and by whomever prepared, produced, disseminated, or made.

4. Identify each Affiliate¹⁷ and Subsidiary¹⁸ of the Company and describe the functions and services offered by each.
5. State whether the Company has held any associations with an entity identified on the Covered List (i.e. named entities, affiliates or subsidiaries thereof, or entities identified in Section 1709(a)(1) of the FY25 NDAA, including DJI Technologies and Autel Robotics) through a subsidiary, affiliate, partnership, joint venture, technology sharing agreement, or licensing agreement. These associations may involve original design manufacturing, original equipment manufacturing, consulting, testing, marketing, equipment servicing, employment, revenue sharing, data sharing, or data processing. Provide a detailed description of each such arrangement, including its start and end dates, and identify the documents that memorialize the terms.

Where appropriate, portions of your response to the following inquiries may be provided in a tabular format, such as one or more Word tables or Excel spreadsheets. The Company must include a searchable digital file when it transmits a copy of its response. The Company remains under a continuing obligation to supplement its responses, as indicated in the Instructions.

U.S. Marketing Information:

6. Provide the information below for the following RF equipment and for any electrically identical¹⁹ equipment marketed in the United States by the Company: Model Number YMAWZOD and Model Number FMAWZOD.
 - a. Provide all trade names, model numbers, version numbers, FCC Identifiers, and any other unique identifiers that apply;
 - b. Provide a detailed description of the device, its features, its operation, and its specifications;
 - c. State the type of equipment authorization(s) obtained (e.g., certification, Supplier's Declaration of Conformity (SDoC)) and the date of authorization, or, if applicable, state the section of the Commission's rules that establishes an exemption;
 - d. Identify the manufacturer and the manufacturing facilities that produce the device, and state where the manufacturing facilities are located;
 - e. Provide the manufacturer name, unique part identifier(s) (e.g., manufacturer part number, product code, SKU), and place(s) of production for each modular transmitter, if any, that meets the requirements of 47 CFR § 15.212, regardless of authorization status;
 - f. Provide a detailed bill of materials for each of the products, including the manufacturer name, unique part identifier(s) (e.g., manufacturer part number, product code, SKU), place(s) of production, including places of design, development, and assembly, for every component;²⁰

¹⁷ For purposes of this LOI, an "affiliate" has the same meaning as the definition provided in 47 CFR § 2.903(e).

¹⁸ For purposes of this LOI, a "subsidiary" has the same meaning as the definition provided in 47 CFR § 2.903(e).

¹⁹ 47 CFR § 2.924.

²⁰ UAS critical components include, but are not limited to, the following UAS components and any associated software: Data transmission devices, Communications systems, Flight controllers, Ground control stations and UAS

- g. Provide a quantitative assessment of supply chain concentration by country, expressed as both a percentage of total value and production volume, and provide the estimated percentage value for each component;
 - h. State the dates on which the Company began and ceased manufacturing the device and;
 - i. State the dates on which the Company began and ceased sales of the device in the United States; and,
 - j. If any entity named on the Covered List, or any subsidiary or affiliate of a named entity, has produced the device or any component, Identify the entity.
- 7. If any equipment listed in response to Inquiry 6 has been updated or changed in any respect, including changes to its housing, components, or circuitry and changes that do not affect its RF characteristics, describe each change and state the date on which it was introduced.
- 8. Describe the effect of each software change or update that has been made available to the user or the device, including changes that do not affect the RF characteristics. For each, identify the software developer and state the date on which the change became available.
- 9. Describe the Company's manufacturing operations.
 - a. Provide a detailed explanation of how the Company develops and integrates RF equipment into its product catalog, including all actions related to component and product selection or design, software and hardware development, device testing, and manufacturing.
 - b. Identify each entity that is involved in the production of the Company's RF equipment or the production of UAS critical components used in the RF equipment.
- 10. Identify all entities within the United States (including, but not limited to, partners, distributors, resellers, integrators, installers, service providers, and other business entities) with whom the Company has worked to market the Company's RF equipment within the United States. Describe each such entity's role in marketing the Company's RF equipment, and for each such entity, provide its current or last known business address, current or last known business telephone number, and an e-mail address of a point of contact within such entity.
- 11. Describe any compliance practices and procedures the Company employs to ensure that its supply chain does not include equipment or components produced by Covered List entities.
- 12. State whether there has been a change in the name, mailing address or physical address, email address, or telephone number of any designated U.S. agent for service of process for the Company. If so, state whether the Company provided written notice to the FCC within 30 days after such change, as required by section 2.929(c) of the Commission's rules.²¹ If there was a change and written notice was not provided pursuant to the Commission's rules, describe the change here.

controllers, Navigation systems, Sensors and Cameras, Batteries and Battery Management Systems, and Motors. See Dec. 21, 2025 National Security Determination at 2, 5.

²¹ 47 CFR § 2.929(c).

Requests for Documents

13. For all equipment identified in response to Inquiry 6, provide the Hardware and Software Bills of Material,²² Documents²³ that demonstrate any change requests and change orders, and release notes for each software or firmware change.
14. For all equipment identified in response to Inquiry 6, or portion thereof, that is subject to authorization by SDoC, provide all required compliance statements, test measurements, reports, and other records that demonstrate its compliance with the applicable technical and administrative rules.²⁴ If the original version of the model has been changed in any respect, also provide records that demonstrate the compliance of each subsequent version. For all equipment identified in response to Inquiry 6, or portion thereof, that is subject to authorization by certification, provide all required test measurements, reports, and records that document the compliance of each version that has undergone a Class I permissive change.²⁵
15. Provide copies of all original Documents that serve as the basis for or otherwise support the responses to all Inquiries above. Original Documents must be provided; where applicable, an English language translation must also be provided.

Filing Requirements

Affidavit Requirement. We direct the Company to support its responses with an affidavit or declaration under penalty of perjury, signed and dated by an authorized officer of the Company with personal knowledge of the representations provided in the Company's response. The affidavit or declaration must verify the truth and accuracy of the information therein, state that all the information requested by this letter that is in the Company's possession, custody, control, or knowledge has been produced, and state that any and all documents provided in its responses are true and accurate copies of the original documents. In addition to such general affidavit or declaration of the authorized officer of the Company described above, if such officer (or any other affiant or declarant) is relying on the personal knowledge of any other individual rather than his or her own knowledge, and if multiple Company employees contribute to the response, the Company shall provide separate affidavits or declarations of each such individual with personal knowledge that identify clearly to which responses the affiant or declarant with such personal knowledge is attesting. All such declarations provided must comply with section 1.16 of the Commission's rules,²⁶ and be substantially in the form set forth therein. Failure to support your responses with a sworn affidavit could subject you to forfeiture.²⁷

Delivery Requirements. The Company shall send its response via e-mail to EB-SED-Response@fcc.gov. The electronic copy shall be produced in a format that allows the Commission to access and use it, together with instructions and all other materials necessary to use or interpret the data,

²² For purposes of this LOI, "Hardware Bills of Material" means every physical component, part, and assembly used to build a hardware product used for manufacturing and supply chain management. "Software Bills of Material" means a structured list detailing components, versions, licenses, and suppliers of software, including both open-source and proprietary code. The HBOM and SBOM should be provided in all formats used by the Company.

²³ See *supra* note 16.

²⁴ 47 CFR §§ 2.906, 2.931, 2.938, 2.1077.

²⁵ 47 CFR §§ 2.907, 2.931, 2.938, 2.1043(b)(1).

²⁶ 47 CFR § 1.16.

²⁷ *SBC Commc'ns, Inc.*, 17 FCC Rcd at 7600, para. 28 (imposing \$100,000 penalty for failing to submit a sworn written response).

including record layouts, data dictionaries, and a description of the data's source. Due to network file size restrictions, the Company should partition the response into separate e-mails of less than 10 MB, including attachments. The Company should seek guidance in sufficient advance of the response deadline if it requires an alternative method of delivery.

Instructions

Request for Confidential Treatment. In addition to providing the requested information and documents, any request for confidentiality of certain information or documents must strictly comply with the requirements of 47 CFR § 0.459, including a statement of the reasons for withholding the materials from inspection. The request must include a schedule of the information or documents for which confidentiality is requested that states, individually as to each such item, the information required by section 0.459(b) of the Commission's rules including, but not limited to, identifying the specific information for which confidential treatment is sought; explaining the degree to which the information is commercial or financial, or contains a trade secret or is privileged; and explaining how disclosure of the information could result in substantial competitive harm.²⁸ Accordingly, a "blanket" request for confidentiality or a casual request, including simply stamping pages "confidential," will not be considered a proper request for confidentiality, and those materials will not be treated as confidential.²⁹

Claims of Privilege. If the Company withholds any information or documents under claim of privilege, it shall submit, together with any claim of privilege, a schedule of the items withheld that states, individually as to each such item: the numbered Inquiry to which each item responds and the type, title, specific subject matter and date of the item; the names, addresses, positions, and organizations of all authors and recipients of the item; and the specific grounds for claiming that the item is privileged.

Format of Responses. The response must be organized in the same manner as the questions asked, i.e., the response to Inquiry 1 should be labeled as responsive to Inquiry 1.

Method of Producing Documents. The Company shall submit each requested Document in its entirety, even if only a portion of that document is responsive to an inquiry made herein, including all appendices, tables, or other attachments, and all other documents referred to in the document or attachments. The Company shall not edit, cut, expunge, or otherwise take any action to modify any document submitted in response to this LOI. In addition to any document the Company submits in response to any inquiry, the Company shall also submit all written materials necessary to understand any document responsive to these inquiries. Accordingly, original Documents that are not in English must be accompanied by an English-language translation.

Identification of Documents. For each document or statement submitted in response to the inquiries stated in the cover letter, indicate, by number, to which inquiry it is responsive and identify the Persons from whose files the document was retrieved. If any document is not dated, state the date on which it was prepared. If any document does not identify its authors or recipients, state, if known, the names of the authors or recipients. The Company must identify with reasonable specificity all documents provided in response to these inquiries.

The Company shall identify all documents provided in response to these inquiries in accordance with this paragraph. The Company shall include a reference label on each document that identifies each document in sequential and consecutive numerical order and "Bates" stamp all documents (e.g., Company 01-000001, where "Company" is the responding entity, "01" signifying that the document is response to

²⁸ See 47 CFR § 0.459(b).

²⁹ See 47 CFR § 0.459(c).

Question 1 of this LOI, and “000001” indicating that the document is the first page in a consecutively numbered range potentially reaching one hundred thousand). Elements such as these should be separated by dashes, as indicated. For each document submitted in response to this LOI, the Company shall provide an index indicating: the title of the document; the date of the document; the custodian from whose files the document was retrieved; the author and recipient of the document; and the corresponding reference label number assigned to the document. If any document is not dated, the Company shall state the date on which it was prepared. If any document does not identify its authors or recipients, state, if known, the names of the authors or recipients.

Documents Already Provided. If a document responsive to any inquiry made herein has already been provided to the Bureau during this or any other investigation, identify each such document, when and how it was produced to the Bureau, and specify the Bates-number range for the document.

Documents No Longer Available. If a document responsive to any Inquiry made herein existed but is no longer available, or if the Company is unable for any reason to produce a document responsive to any Inquiry, identify each such document by author, recipient, date, title, and specific subject matter, and explain fully why the document is no longer available or why the Company is otherwise unable to produce it.

Retention of Original Documents. With respect only to documents responsive to the specific Inquiries made herein and any other documents relevant to those Inquiries, the Company is directed to retain the originals of those documents for twenty-four months from the date of this letter unless (a) the Company is directed or informed by the Bureau in writing to retain such documents for some shorter or longer period of time, or (b) the Bureau or the Commission releases an item on the subject of this investigation, including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case, the Company must retain all such documents until the matter has been finally concluded by payment of any monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Bureau.

Continuing Nature of Inquiries. The specific Inquiries made herein are continuing in nature. The Company is required to produce in the future any and all documents and information that are responsive to the Inquiries made herein but not initially produced at the time, date, and place specified herein. In this regard, the Company must supplement its responses (a) if the Company learns that, in some material respect, the documents and information initially disclosed were incomplete or incorrect or (b) if additional responsive documents or information are acquired by or become known to the Company after the initial production. The requirement to update the record will continue for twenty-four months from the date of this letter unless (a) the Company is directed or informed by the Bureau in writing that the Company’s obligation to update the record will continue for some shorter or longer period of time, or (b) the Bureau or the Commission releases an item on the subject of this investigation, including, but not limited to, a Notice of Apparent Liability for Forfeiture or an order disposing of the issues in the investigation, in which case the obligation to update the record will continue until the matter has been finally concluded by payment of any such monetary penalty, satisfaction of all conditions, expiration of all possible appeals, conclusion of any enforcement action brought by the United States Department of Justice, or execution and implementation of a final settlement with the Commission or the Bureau.

Construction. The terms “any” and “all,” “and” and “or,” and “each” and “every” shall be construed inclusively to bring within the scope of the requests for information and documents all information and documents that might otherwise arguably be construed as outside the scope of the requests. Likewise, the singular of any word or defined term shall include the plural and the plural of any

such word or defined term shall include the singular. The words “relating to” or “relate to” shall be construed to mean, whether directly or indirectly, in whole or in part constituting, containing, concerning, discussing, describing, analyzing, identifying, supporting, qualifying, confirming, contradicting, or stating.