Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Hytera Communications Corporation Limited	)	File No.: EB-SED-25-00038006
	)	FRN: 0019701887
	)	NAL/Acct. No.: 202632100002
	)	
ZTE Corporation	)	File No.: EB-SED-25-00038008
	)	FRNs: 0009043175, 0022602015
	)	NAL/Acct. No.: 202632100003

NOTICE OF APPARENT LIABILITY FOR FORFEITURE AND ORDER

Adopted: August 27, 2026 **Released: August 28, 2026**

By the Commission:

I. INTRODUCTION

1. We propose a penalty of $188,491 against Hytera Communications Corporation Limited (Hytera) and ZTE Corporation (ZTE) (Company or, collectively, Companies) which are named on the Federal Communications Commission's (FCC or Commission) Covered List,[1] for failing to submit to the Commission the full names of, and identifying information for, each of their respective associated entities (e.g., subsidiaries and affiliates) identified on the Covered List as producing covered communications equipment,[2] in apparent violation of section 2.903(d) of the Commission's rules.[3] Based on the facts set forth below, we find that the Companies either failed to make a complete filing with the Commission by the March 8, 2023 deadline or failed to notify the Commission of any changes to the information within 30 days of those changes.[4] It is essential that the Commission, and all other relevant stakeholders, have

[1] FCC, Public Safety and Homeland Security Bureau, *List of Equipment and Services Covered By Section 2 of The Secure Networks Act*, https://www.fcc.gov/supplychain/coveredlist (Covered List); 47 CFR § 1.50000 *et seq.* For simplicity, we will refer to the entities identified by name on the Covered List as "Named Entities."

[2] The inclusion of entities named on the Covered List is read to include the subsidiaries and affiliates of such entities. *See* Covered List.

[3] 47 CFR § 2.903(d); *see also Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program,* ET Docket No. 21-232, Second Report and Order, Order, and Second Further Notice of Proposed Rulemaking, 40 FCC Rcd 8430 (2025) (*2025 Equipment Authorization Second Report and Order*) (amended section 47 CFR 2.903 by redesignating paragraphs (b) as paragraph (d) though no change to the text of the subsection was made). This item will refer to the rule subsection by its current rule designation, 47 CFR 2.903(d).

[4] 47 CFR § 2.903(d). After the redesignation of section 2.903(b) to section 2.903(d) in the *2025 Equipment Authorization Second Report and Order*, the cross-references in subsections 2.903(d)(1)-(3) now point to paragraph (b) rather than paragraph (d). *See* Federal Communications Commission, Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program, 88 Fed. Reg. 7592 (Feb. 6, 2023) (adding section 2.903 to part 2); Federal Communications Commission, Protecting Against National Security Threats to the Communications Supply Chain Through the Equipment Authorization Program, 90 Fed. Reg. 53227 (Nov. 25, 2025) (redesignating section 2.903 paragraph (b) as paragraph (d)). The *2025 Equipment Authorization Second Report and Order*, however, did not change the substance of former section 2.903(b) when it was redesignated it as 2.903(d). Therefore, subsections (d)(1)-(3) in section 2.903(d) should be read to refer to paragraph (d), just as prior subsections (b)(1)-(3) referred to paragraph (b) did before the redesignation. *See supra* n.3; *2025 Equipment Authorization Second Report and Order*, 40 FCC Rcd at 8476; *see also Protecting Against*

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access to clear, transparent, and readily available information identifying the specific entities that are associated with entities named on the Covered List.[5] This requirement aligns with the Commission's responsibility under the Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act) to maintain the Covered List and its responsibility under the Secure Equipment Act of 2021 (Secure Equipment Act) to ensure that no equipment authorization is granted for "covered" equipment.[6]

II. BACKGROUND

A. Legal Framework

2. In August 2018, Congress enacted section 889 of the National Defense Authorization Act for Fiscal Year 2019 (2019 NDAA), in which it, among other things, prohibited federal agencies from certain actions related to the procurement or use of "covered telecommunications equipment or services," which Congress defined, in relevant part, as including "[t]elecommunications equipment" produced by ZTE, "including telecommunications or video surveillance services" provided by these entities using such equipment,"[7] and "video surveillance and telecommunications equipment" produced by Hytera when used "[f]or the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes," including telecommunications or video surveillance services provided by these entities when using such equipment.[8] In March 2020, Congress enacted the Secure Networks Act for the purposes of preventing communications equipment or services that pose a national security risk from entering U.S. networks and to facilitate the removal of such equipment already in use.[9] In furtherance of this purpose, the Secure Networks Act requires the Commission to publish, and periodically update, a list of "covered communications equipment and services" that have been determined to pose national security risks (Covered List), including "covered telecommunications equipment or services" as defined in section 889(f)(3) of the 2019 NDAA.[10]

3. In response to this legislation, on March 12, 2021, the Commission published the first version of the Covered List, comprising communications equipment and services of the five entities (and their respective affiliates and subsidiaries) named in the 2019 NDAA.[11] These companies are: Huawei,

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National Security Threats to the Communications Supply Chain through the Competitive Bidding Program, EA Docket No. 21-233, Report and Order, Order, and Further Notice of Proposed Rulemaking, 37 FCC Rcd 13493, 13622, Appendix A (2022) (*2022 Equipment Authorization Security Report and Order*) (amended the rules to add section 2.903(b)(1)-(3)).

[5] *2022 Equipment Authorization Security Report and Order*, 37 FCC Rcd at 13565-66, para. 185.

[6] *See* Secure and Trusted Communications Networks Act of 2019, Pub. L. No. 116-124, § 2 (2020) (codified at 47 U.S.C. § 1601) (Secure Networks Act); Secure Equipment Act of 2021, Pub. L. No. 117-55, § 2 (codified at 47 U.S.C. § 1601 note) (Secure Equipment Act).

[7] *See* National Defense Authorization Act for Fiscal Year 2019, Pub. L. No. 115-232 at § 889(f)(3)(A) (2018) (2019 NDAA).

[8] *See* 2019 NDAA at § 889(f)(3)(B).

[9] *See* Secure Networks Act.

[10] 47 U.S.C. § 1601(b), (d); 2019 NDAA § 889(f)(3).

[11] *See Public Safety and Homeland Security Bureau Announces Publication of the List of Equipment and Services Covered by Section 2 of the Secure Networks Act*, WC Docket No. 18-89, Public Notice, 36 FCC Rcd 5534 (PSHSB Mar. 12, 2021); *supra* n.2. The Commission has subsequently updated the Covered List to identify additional entities. *FCC's Public Safety and Homeland Security Bureau Announces Addition of Routers Produced in Foreign Countries to FCC Covered List*, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-33, Public Notice, DA 26-278 (PSHSB Mar. 23, 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, 2026 WL 85236, *3 (PSHSB Jan. 7, 2026); *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*

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ZTE, Hytera, Hikvision, and Dahua Technology Company.[12] On November 11, 2021, Congress enacted the Secure Equipment Act which required the Commission to establish rules stating that it will no longer review or approve any application for equipment authorization for any "covered" equipment that is on the Covered List.[13] Subsequently, on November 25, 2022, the Commission issued its *2022 Equipment Authorization Security Report and Order*, implementing the Secure Equipment Act, in which it adopted section 2.903 of the Commission's rules.[14] This rule requires each entity named on the Covered List (Named Entity) to provide to the Commission contact information for itself, and for affiliates and subsidiaries that produce covered communications equipment, within thirty (30) days of the Report and Order's publication (i.e., by March 8, 2023),[15] and to submit updates within thirty (30) days of publication of an updated list[16] or any subsequent changes.[17]

FY2025 NDAA, *to FCC Covered List*, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, Public Notice, 40 FCC Rcd 10215, 10218 (PSHSB Dec. 22, 2025); *FCC National Security Advisory, Reminder: Communications Equipment and Services on the Covered List Pose an Unacceptable Risk to National Security*, WC Docket No, 18-89, ET Docket No. 21-232, EA Docket No. 21-233, ET Docket No. 24-136, Public Notice, 40 FCC Rcd 7867 (OET Oct. 14, 2025) (FCC National Security Advisory); *Public Safety and Homeland Security Bureau Announces Update to List of Covered Equipment and Services Pursuant to Section 2 of the Secure Networks Act*, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, Public Notice, 39 FCC Rcd 8395 (PSHSB July 23, 2024); *Public Safety and Homeland Security Bureau Announces Additions to the List of Equipment and Services Covered by Section 2 of the Secure Networks Act*, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233, Public Notice, 37 FCC Rcd 10735 (PSHSB Sept. 20, 2022); *Public Safety and Homeland Security Bureau Announces Additions to the List of Equipment and Services Covered by Section 2 of the Secure Networks Act*, WC Docket No. 18-89, Public Notice, 37 FCC Rcd 4078 (PSHSB Mar. 25, 2022).

[12] *See* Covered List. Under the 2019 NDAA, Congress designated "Dahua Technology Company" as a prohibited entity, which is how the company is identified on the Commission's Covered List. *See* 2019 NDAA. Dahua Technology Company's formal legal name is Zhejiang Dahua Technology Co., Ltd. (Zhejiang Dahua). *See* Response to Letter of Inquiry from Dahua Technology Company to Spectrum Enforcement Division, FCC Enforcement Bureau, note 4 (Mar. 19, 2025) (on file in EB-SED-25-00038004). We previously released a Notice of Apparent Liability for Forfeiture (NAL) proposing a penalty of $188,491 against Zhejiang Dahua for failing to timely submit to the Commission the contact information for its subsidiaries and affiliates identified on the Covered List as producing covered communications equipment, in apparent violation of section 2.903(d) of the Commission's rules. *See Zhejiang Dahua Technology Co., Ltd*., Notice of Apparent Liability for Forfeiture, FCC 26-7, 2026 WL 487755 (2026) (*Zhejiang Dahua NAL*).

[13] *See* Secure Equipment Act.

[14] *See 2022 Equipment Authorization Security Report and Order*, 37 FCC Rcd at 13566-67, para. 186; 47 CFR § 2.903. *See also supra* n.4.

[15] 47 CFR § 2.903(d)(1); 88 Fed. Reg. 7592 (Feb. 6, 2023) (establishing the submission deadline of March 8, 2023). Specifically, section 2.903(d) requires that each Named Entity provide: the full name, mailing address or physical address (if different from mailing address), email address, and telephone number of its associated entities (e.g., subsidiaries or affiliates) identified on the Covered List as producing covered communications equipment. In the *2022 Equipment Authorization Security Report and Order*, the Commission emphasized that "requiring that this information be provided to the Commission and made public aligns with the regulatory requirements that the Commission proposed in the NPRM and that we are adopting, namely placing responsibilities on applicants to attest that their equipment is not 'covered' equipment produced by any of entities identified on the Covered List." *2022 Equipment Authorization Security Report and Order*, 37 FCC Rcd at 13566, para. 185. The Commission further stated that "it is also critical that such information be up-to-date and maintained in a place for all interested parties to reference for purposes of compliance with our rules, including the applicants' attestation requirements." *Id*. The Commission therefore found that, in balancing the various interests, "the public interest in the public knowing which entities are subsidiaries or affiliates of entities on the Covered List outweighs whatever private interest those entities may have in keeping this information confidential." *Id*. at n.459.

[16] 47 CFR § 2.903(d)(2); *supra* n.4.

[17] 47 CFR 2.903(d)(3); *supra* n.4.

4. The Commission emphasized in the *2022 Equipment Authorization Security Report and Order* the critical importance of ensuring that it, along with applicants for equipment authorization, Telecommunications Certification Bodies, and other stakeholders, has ready access to accurate information identifying which entities are affiliated with entities named on the Covered List and produce covered communications equipment and thus identified on the Covered List.[18] The submission and public availability of these associations directly supports the Commission's statutory obligation to prevent unauthorized or potentially insecure equipment from entering the U.S. marketplace.[19] Maintaining a complete, accurate, and transparent record of the affiliations of Named Entities aligns with the Commission's responsibility to enforce the Secure Networks Act and the Secure Equipment Act. Moreover, as the Commission highlighted in the *2022 Equipment Authorization Security Report and Order*, it is also essential that such information be kept current and readily accessible to all stakeholders to support compliance with our rules, including the applicants' attestation requirements.[20]

5. On February 19, 2026, the Commission released a NAL proposing a penalty of $188,491 against Zhejiang Dahua for failing to timely submit to the Commission the contact information for each of its subsidiaries and affiliates identified on the Covered List as producing covered communications equipment, in apparent violation of section 2.903(d) of the Commission's rules.[21] Despite a March 8, 2023 filing deadline, Zhejiang Dahua did not submit its filing, pursuant to section 2.903(d) of the Commission's rules, until September 22, 2025.[22] The Commission found that Zhejiang Dahua's failure to file the required information publicly by March 8, 2023, as mandated by the Commission's rules, not only constituted an apparent continuing violation of section 2.903(d) of the Commission's rules, but it also undermined the Commission's broader mission and statutory obligation to safeguard U.S. communications networks from insecure or untrustworthy equipment.[23] Accordingly, the Commission proposed the statutory maximum forfeiture of $188,491 for Zhejiang Dahnua's apparent continuing violation of section 2.903(d) of the Commission's rules.[24]

B. Factual Background

6. Under the Commission's rules, Hytera and ZTE, as Named Entities, were obligated to provide the Commission with the full names of, and identifying information for, all their subsidiaries and affiliates producing covered communications equipment on or before March 8, 2023, and to update those filings in accordance with the Commission's rules.[25] Accordingly, on March 8, 2023, each Company submitted a public filing informing the Commission of their associated affiliates and subsidiaries that produce covered communications equipment.[26]

7. On February 26, 2025, the Enforcement Bureau (Bureau) initiated investigations into the Companies and issued a letter of inquiry (LOI) to each of the Companies requesting a list of all

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[18] *2022 Equipment Authorization Security Report and Order*, 37 FCC Rcd at 13566, para. 185.

[19] *Id.*

[20] *Id.*

[21] *See supra* n.12; 47 CFR § 2.903(d).

[22] *See* Letter from Zhejiang Dahua Technology Co., Ltd. to FCC (Sept. 22, 2025) (September 22, 2025 Notice of Subsidiaries and Affiliates); 47 CFR § 2.903(d)(1).

[23] *See Zhejiang Dahua NAL*, 2026 WL 487755, *3, para. 9.

[24] *Id.* at *5, para. 12.

[25] *See* 47 CFR § 2.903(d).

[26] Hytera Communications Corporations Limited Notification Pursuant to Rule 2.903(b), ET Docket No. 21-232 (filed Mar. 8, 2023) (Hytera March 2023 Filing); Letter from Shen Nan, Senior Vice President, Chief Legal Officer, ZTE Corporation, to Marlene Dortch, Secretary, FCC, ET Docket No. 21-232 (filed Mar. 8, 2023) (ZTE March 2023 Filing).

subsidiaries and affiliates for each Company.[27] The Companies submitted responses to the Bureau's LOIs between March 12 and March 24, 2025.[28] On March 21, 2025, the Commission formally announced investigations into the Named Entities then on the Covered List, including the Companies.[29]

8. After the Companies submitted their filings pursuant to section 2.903(d) of the Commission's rules and responded to the Bureau's LOIs, Commission staff reviewed publicly available information identifying apparent affiliates and subsidiaries of the Companies disclosed in the Companies' LOI responses that may produce covered communications equipment and would therefore be subject to the disclosure requirements under section 2.903(d) of the Commission's rules.[30] The attached Appendix identifies (a) the entities disclosed by each Company pursuant to section 2.903(d) of the Commission's rules and (b) those entities disclosed by each Company as part of their LOI response which Commission staff identified as potentially producing covered communications equipment but not disclosed pursuant to section 2.903(d).[31] Multiple public sources identified the disclosed subsidiaries and affiliates as entities that may produce covered communications equipment. Some of these public sources included company profiles on Bloomberg,[32] Dun & Bradstreet,[33] business conventions and expositions,[34] university procurement advisories and disclosures,[35] and the Companies' own websites[36] that indicated the entities were producers of covered equipment such as video surveillance and telecommunications equipment, including services using such equipment. Commission staff further reviewed publicly available information from public universities whose procurement departments maintain lists of identified subsidiaries and affiliates of the Companies on the Covered List to prohibit agreements and services with these Companies.[37] The information provided in each Company's filings widely differs from publicly

[27] Letter of Inquiry from Spectrum Enforcement Division, FCC Enforcement Bureau, to Hytera Communications Corporation (Feb. 26, 2025) (on file in EB-SED-25-00038006) (Hytera LOI); Letter of Inquiry from Spectrum Enforcement Division, FCC Enforcement Bureau, to ZTE Corporation (Feb. 26, 2025) (on file in EB-SED-25-00038008) (ZTE LOI).

[28] Response to Letter of Inquiry from Hytera Communications Corporation Ltd., to Spectrum Enforcement Division, FCC Enforcement Bureau (Mar. 12, 2025) (on file in EB-SED-25-00038006) (Hytera LOI Response); Response to Letter of Inquiry from ZTE Corporation, to Spectrum Enforcement Division, FCC Enforcement Bureau (Mar. 24, 2025) (on file in EB-SED-52-0038008) (ZTE LOI Response).

[29] Press Release, FCC, Carr Announces Sweeping New Investigations into CCP-Aligned Entities (Mar. 21, 2025) https://docs.fcc.gov/public/attachments/DOC-410318A1.pdf.

[30] 47 CFR § 2.903(d).

[31] *See* Appendix; 47 CFR § 2.903(d).

[32] *See e.g.*, Bloomberg, www.bloomberg.com (last visited May 26, 2026).

[33] *See e.g.*, Dun & Bradstreet, https://www.dnb.com/ (last visited May 26, 2026).

[34] *See e.g.*, China International Import Expo, https://www.ciie.org/zbh/en/ (last visited May 26, 2026); Company registration information from China National Enterprise Credit Information Database, https://www.cnverify.com (last visited May 21, 2026); Tuv Rheinland Certificate Database, https://www.tuv.com/ (last visited May 26, 2026).

[35] *See e.g.*, Gettysburg College, Prohibited Telecommunications & Video Surveillance Agreements, https://www.gettysburg.edu/offices/grants/guidebook/prohibited-agreements-telecommunications-video (last visited May 26, 2026); https://procurement.gatech.edu/sites/default/documents/ProhibitedSuppliers10-25.pdf (last visited May 26, 2026); https://www.procurement.vt.edu/content/dam/procurement_vt_edu/pcard/NDAA_Companies.pdf (last visited May 26, 2026); https://blink.ucsd.edu/technology/security/ndaa/index.html (last visited May 26, 2026).

[36] *See e.g.*, Hytera, https://hytera.co.za (last visited May 26, 2026); ZTE Global, www.zte.com.cn (last visited May 26, 2026); HMF Smart Solutions, https://hmf-smart-solutions.de/ (last visited May 26, 2026); LaXense, https://www.laxense.com (last visited May 26, 2026).

[37] Commission staff have identified several public universities maintaining independent lists of subsidiaries and affiliates because entering into agreements with these Companies, including their subsidiaries or affiliates, for telecommunications equipment and/or services is prohibited, as doing so could place universities at risk of losing
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available information which lacks the transparency intended by the Secure Networks Act requiring the Commission to publish, and update, the Covered List as defined in the 2019 NDAA.[38] Hytera's and ZTE's filings with the Commission are summarized below:

9. ***Hytera***. On March 8, 2023, Hytera submitted a public filing styled as "Notification Pursuant to Rule 2.903(b)" identifying three associated entities of Hytera that produce "covered" communications equipment.[39] This was the only filing submitted to the Commission by Hytera pursuant to section 2.903(d) of the Commission's rules.[40] On March 12, 2025, as part of its LOI response, Hytera disclosed 60 additional subsidiaries and affiliates (three had already been disclosed in Hytera's March 2023 Filing) that had not been included in its prior public filing submitted to the Commission pursuant to section 2.903(d) of the Commission's rules.[41] Despite identifying 60 additional entities, Hytera did not update its section 2.903(d) filing with the Commission. Upon reviewing publicly available information, Commission staff concluded that 49 of the 60 additional entities apparently associated with Hytera may be producing covered communications equipment and therefore must be disclosed to the Commission pursuant to section 2.903(d) of the Commission's rules.[42] Hytera's disclosures to the Commission and the Commission's investigation are summarized in the following table, with additional information appearing in the Appendix.[43]

Entities Identified in § 2.903(d) Filing(s)	**Submission Date(s)**
3	March 8, 2023
Entities Disclosed in the LOI Response but not Disclosed Pursuant to § 2.903(d) and Subsequently Identified as Potentially Producing Covered Communications Equipment	**Submission Date**
49	March 12, 2025

federal grants and contracts. *See* 2 CFR § 200.216. *See also* Georgia Institute of Technology, *Prohibited Agreement with Huawei, ZTE Corp, Hytera, Hangzhou Hikvision, Dahua and their Subsidiaries and Affiliates*, https://procurement.gatech.edu/sites/default/documents/ProhibitedSuppliers10-25.pdf (last visited May 6, 2026); University of Oklahoma, *Currently identified subsidiaries/affiliates of Huawei Technologies Company and ZTE Corporation*, https://ou.edu/content/dam/research-norman/docs/grants/ec_Current_List_of_Subsidiaries.pdf (last visited May 6, 2026) (information adapted from the University of Minnesota); University of California San Diego, *NDAA Prohibited Manufacturers* (Mar. 14, 2023), https://blink.ucsd.edu/technology/security/ndaa/index.html (last visited May 6, 2026).

[38] 47 U.S.C. § 1601(b), (d); 2019 NDAA § 889(f)(3).

[39] Hytera March 2023 Filing.

[40] 47 CFR § 2.903(d).

[41] *See* Hytera LOI Response at 2 and Exhibit HCC 01-00001-2; Appendix. Hytera requested confidential treatment for its listings of affiliates and subsidiaries submitted as part of its LOI response. *See* Letter from Counsel for Hytera Communications Corporation Ltd to Marlene H. Dortch, Secretary, Federal Communications Commission (Mar. 12, 2025) (on file in EB-SED-25-00038006) (requesting confidential treatment for the information submitted with its LOI response, including without limitation, "its subsidiaries and affiliates" contained in its LOI response); Letter from Counsel for Hytera to Marlene H. Dortch, Secretary, Federal Communications Commission (Apr. 16, 2025) (on file in EB-SED-25-00038006) (containing the same requests for confidential treatment as its initial confidentiality request) (Requests for Confidential Treatment). On June 12, 2026, the Bureau issued a letter order denying in part Hytera's Requests for Confidential Treatment. *See* Letter to Counsel for Hytera Communications Corporation Limited, from the Enforcement Bureau (June 12, 2026) (on file in EB-SED-25-00038006).

[42] 47 CFR § 2.903(d).

[43] *See* Appendix for a listing of the entity names.

10. ***ZTE***. On March 8, 2023, ZTE submitted a public filing styled as "Certain Information Regarding Subsidiaries and Affiliates of ZTE Corporation That Produce Radiofrequency Equipment" identifying a single entity that produces equipment "that requires an equipment authorization under the Commission's rules."[44] This was the only filing ZTE submitted to the Commission pursuant to section 2.903(d) of the Commission's rules.[45] On March 24, 2025, as part of its LOI response, ZTE disclosed 15 additional subsidiaries and affiliates (including two that had already been dissolved prior to ZTE's March 2023 Filing and two that were dissolved after ZTE's March 2023 Filing) that had not been included in its prior public filing submitted to the Commission pursuant to section 2.903(d) of the Commission's rules.[46] Despite reporting 13 currently active additional entities, ZTE did not update its section 2.903(d) submission to the Commission. Upon reviewing publicly available information, Commission staff concluded that 11 of the 13 additional entities apparently associated with ZTE may be producing covered communications equipment and therefore must be disclosed to the Commission pursuant to section 2.903(d) of the Commission's rules.[47] ZTE's disclosures to the Commission and the Commission's investigation are summarized in the following table, with additional information appearing in the Appendix.[48]

Entities Identified in § 2.903(d) filing(s)	**Submission Date**
1	March 8, 2023
Entities Disclosed in the LOI Response but not Disclosed Pursuant to § 2.903(d) and Subsequently Identified as Potentially Producing Covered Communications Equipment	**Submission Date**
11	March 24, 2025

III. DISCUSSION

11. We find that Hytera and ZTE apparently willfully and repeatedly violated section 2.903(d) of the Commission's rules by failing to timely submit to the Commission the full names of, and identifying information for, *all* their subsidiaries and affiliates that produce covered communications equipment, as required of all Named Entities, or to submit updated information to the Commission pursuant to section 2.903(d)(3) of the Commission's rules.[49] Although the Companies each submitted a list of affiliates and subsidiaries that produce covered communications equipment by the initial March 8, 2023 deadline, their submissions were demonstrably incomplete and therefore apparently violated section 2.903(d) of the Commission's rules.[50]

A. Hytera and ZTE Apparently Willfully and Repeatedly Violated Section 2.903(d) of the Commission's Rules.

12. All Named Entities are required to submit to the Commission contact information for the Named Entity, as well as a comprehensive list of their associated entities, including subsidiaries and

[44] ZTE March 2023 Filing.

[45] 47 CFR § 2.903(d).

[46] *See* ZTE LOI Response.

[47] 47 CFR § 2.903(d).

[48] *See* Appendix for a listing of the entity names.

[49] 47 CFR § 2.903(d); *supra* n.4.

[50] *See* Appendix.

affiliates that produce "covered" communications equipment and their respective contact information.[51] When the Commission adopted the *2022 Equipment Authorization Security Report and Order*, the Companies became obligated under section 2.903(d) of the Commission's rules to provide this information by March 8, 2023, and within 30 days of any updates or changes to the Covered List.[52]

13. Although the Companies submitted a list of their affiliates and subsidiaries that produce covered communications equipment by the March 8, 2023 deadline, their responses to the Bureau's LOIs, as well as publicly available information, demonstrate that the Companies each fell far short of making full disclosures under section 2.903(d) of the Commission's rules.[53] Specifically, Hytera acknowledged its obligations under section 2.903(d) of the Commission's rules when it publicly filed its March 2023 filing, but later identified 60 additional subsidiaries and affiliates in its LOI response.[54] Despite this, Hytera failed to publicly update its 2.903(d) filing, as required by the Commission's rules.[55] Similarly, ZTE acknowledged its obligations under section 2.903(d) of the Commission's rules when it publicly filed in March 2023, but subsequently identified 13 additional subsidiaries and affiliates, including two that were dissolved after ZTE's March 2023 filing, in its LOI response.[56] Despite this, ZTE likewise failed to update its public filing to reflect this information, as required by the Commission's rules.[57]

14. Publicly available information suggests that additional subsidiaries and affiliates disclosed by the Companies may produce covered communications equipment that were never included in each of the Companies' March 2023 filings.[58] The Secure Networks Act and the Commission's rules requires access to clear, transparent, and readily available information identifying the specific entities that are associated with entities named on the Covered List.[59] It is imperative that such information, which concerns equipment and services posing an unacceptable risk to national security or the safety and security of United States persons, be up-to-date and maintained in a place for all interested stakeholders to review.[60] These failures by the Companies to disclose the full names of, and identifying information for, all their subsidiaries and affiliates that may produce covered communications equipment subject to section 2.903(d) of the Commission's rules not only constitutes apparent continuing violations of section 2.903(d) of the Commission's rules, but also undermines the Commission's broader mission and statutory obligation to safeguard U.S. communications networks from insecure or untrustworthy equipment.

B. Proposed Forfeiture

15. Section 503(b) of the Communications Act of 1934, as amended (Act), authorizes the Commission to impose a forfeiture against any entity that "willfully or repeatedly fail[s] to comply with any of the provisions of [the Act] or of any rule, regulation, or order issued by the Commission[.]"[61] Here, section 503(b)(2)(D) of the Act and section 1.80(b)(10) of the Commission's rules authorize a forfeiture separately against Hytera and ZTE of up to $25,132 for each day of a continuing violation, up

[51] *See 2022 Equipment Authorization Security Report and Order*, 37 FCC at 13566, para. 185; 47 CFR § 2.903(d).

[52] 47 CFR § 2.903(d)(1)-(3); *see supra* n.4.

[53] 47 CFR § 2.903(d).

[54] *See* Hytera LOI Response.

[55] *See 2022 Equipment Authorization Security Report and Order*, 37 FCC at 13566-67, para. 186; 47 CFR § 2.903(d).

[56] *See* ZTE LOI Response.

[57] *See 2022 Equipment Authorization Security Report and Order*, 37 FCC at 13566-67, para. 186; 47 CFR § 2.903(d).

[58] *See supra* para. 7 and nn.32-37.

[59] 47 U.S.C. § 1601(b), (d); 47 CFR § 2.903(d).

[60] *See 2022 Equipment Authorization Security Report and Order*, 37 FCC Rcd at 13565-66, para. 185. *See also* n.29.

[61] 47 U.S.C. § 503(b)(1)(B).

to a statutory maximum of $188,491 for a single act or failure to act.[62] In exercising our forfeiture authority, we consider the "nature, circumstances, extent, and gravity of the violation and, with respect to the violator, the degree of culpability, any history of prior offenses, ability to pay, and such other matters as justice may require."[63] In addition, the Commission has established forfeiture guidelines which provide base penalties for certain violations and identify criteria that we consider when determining the appropriate penalty in any given case.[64] Under these guidelines, we may adjust a forfeiture upward for violations that are egregious, intentional, or repeated, or that cause substantial harm or generate substantial economic gain for the violator.[65] We may adjust the forfeiture downward if, for example, the violation is minor or the violator establishes an inability to pay.[66]

16. Section 1.80(b) of the Commission's rules sets a base forfeiture of $3,000 for failing to file required forms or information for each violation or each day of a continuing violation.[67] In this instance, Hytera and ZTE failed to submit to the Commission full names and contact information for *all* of their subsidiaries and affiliates that produce covered communications equipment as required by section 2.903(d) of the Commission's rules.[68] For purposes of the Act, "continuing" is defined as continuing for more than one day.[69] Here, section 2.903(d) of the Commission's rules requires each entity named on the Covered List to have certain specified information on file with the Commission, including such information as it pertains to subsidiaries and affiliates that produce covered communications equipment, and to continually update that information.[70] The requirement to have such specified information on file with the Commission and to update that information is a continuing obligation.[71] Indeed, failing to make

[62] *See* 47 U.S.C. § 503(b)(2)(D); 47 CFR § 1.80(b)(10) (setting the current inflation adjusted statutory maximum for a violation of 47 U.S.C. § 503(b)(2)(D) at $188,491). *See Amendment of Section 1.80(b) of the Commission's Rules, Adjustment of Civil Monetary Penalties to Reflect Inflation*, Order, 40 FCC Rcd 25 (EB 2025). *See Enforcement Bureau Affirms Cancellation of Adjustments of Civil Monetary Penalties for Inflation*, Public Notice, DA 26-600 (EB June 17, 2026).

[63] 47 U.S.C. § 503(b)(2)(E).

[64] 47 CFR § 1.80(b)(11), Note 2 to paragraph (b)(11).

[65] *Id*.

[66] 47 CFR § 1.80(b)(11), tbl. 3.

[67] 47 CFR § 1.80(b)(11), Table 1 to paragraph (b)(11).

[68] *See* 47 CFR § 2.903(d).

[69] Section 312(f)(2) of the Act, 47 U.S.C. § 312(f)(2), which applies to violations for which forfeitures are assessed under Section 503(b) of the Act, provides that "[t]he term 'repeated', when used with reference to the commission or omission of any act, means the commission or omission of such act more than once or, if such commission or omission is continuous, for more than one day." *See also* H.R. Rep. No. 97-765, 97th Cong. 2d Sess. 51 (1982) ("This provision [inserted in Section 312] defines the terms 'willful' and 'repeated' for purposes of section 312, and for any other relevant section of the act (e.g., Section 503) . . . . As defined[,] . . . 'willful' means that the licensee knew that he was doing the act in question, regardless of whether there was an intent to violate the law. 'Repeated' means more than once, or where the act is continuous, for more than one day. *Whether an act is considered to be 'continuous' would depend upon the circumstances in each case.* The definitions are intended primarily to clarify the language in Sections 312 and 503, and are consistent with the Commission's application of those terms . . . .") (emphasis added).

[70] 47 CFR § 2.903(d). Section 2.903(d)(1)-(3) separately specify deadlines for submitting such information. 47 CFR § 2.903(d)(1) ("no later than March 8, 2023"); 47 CFR § 2.903(d)(2) ("no later than 30 days after the effective date of each updated Covered List"); 47 CFR § 2.903(d)(3) ("any changes . . . no later than 30 days after such change occurs").

[71] Courts have accepted the concept of a continuing violation in the context of mandatory disclosure. The Commission has held in previous cases that failure to file a required form, or to submit a form but with incorrect information, constitutes a continuing violation. *See, e.g.*, *Eken Group Limited*, Notice of Apparent Liability for Forfeiture, 39 FCC Rcd 12990, 13010, para. 48 (2024) (found that Eken's equipment certification applications

(continued…)

a complete initial disclosure or to make subsequent updates in the event of changes necessarily precludes the Commission from determining when or whether a violation of the duty to disclose and to make updates has occurred or if, instead, the duty has been properly and timely discharged. Because Hytera and ZTE have yet to file a complete list of their affiliates and subsidiaries that produce covered communications equipment, along with their respective contact information, in accordance with section 2.903(d) of the Commission's rules, their apparent violation of section 2.903(d) remains unremedied and continues until cured. Moreover, we note that an ongoing failure to provide the information in accordance with section 2.903(d) of the Commission's rules carries significant national security implications because it deprives the public and government stakeholders of information about subsidiaries and affiliates subject to Covered List restrictions. As a result, the Companies' apparent violation of section 2.903(d) of the Commission's rules continues until cured.[72]

17. Hytera and ZTE's failure to file the required information publicly by March 8, 2023, or notify the Commission of any changes to the information within 30 days, as mandated by the Commission's rules, constitutes an apparent continuing violation.[73] As a result, each Company is liable for a forfeiture of $3,000 for each day of their respective apparent continuing violations. When this base forfeiture is applied on a per-day basis to each Company, we quickly reach our statutory maximum penalty under section 503(b)(2)(D) of the Act.[74] Accordingly, we propose the statutory maximum forfeiture of $188,491 separately for Hytera and ZTE for each Company's apparent continuing violation of section 2.903(d) of the Commission's rules. Since the application of the base forfeiture on a per-day

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certifying an incorrect address for its designated agent was a continuing violation); *ADMA Telecom, Inc.,* Forfeiture Order, 26 FCC Rcd 4152, 4155, para. 8 (2011) (finding that ADMA's failure to register with the FCC was a continuing violation that began on the day ADMA started providing interstate telecommunications service without having registered and continued until it filed its first FCC Form 499); *Telrite Corp*., Notice of Apparent Liability for Forfeiture and Order, 23 FCC Rcd 7231, 7244, para. 30 (2008) (construing the carrier's failures to file Telecommunications Reporting Worksheets as "continuing violations for which the statute of limitations for forfeiture does not begin to run until the violation is cured"), *consent decree entered*, *Telrite Corp., Consent Decree,* 27 FCC Rcd 4110 (2012); *VCI Company*, Notice of Apparent Liability for Forfeiture and Order, 22 FCC Rcd 15933, 15940, para. 20 (2007) (finding that an eligible telecommunications carrier's failure to file an accurate FCC Form 497 was a continuing violation until cured); *USA Teleport, Inc.* Memorandum Opinion and Order, 26 FCC Rcd 6431, 6435-36, para. 12 (EB 2011) (finding that USAT's failure to file its 2007 CPNI compliance certification, which had a continuing harmful impact on the Commission's ability to effectively monitor and respond to violations of consumer privacy, was a continuing violation until cured); *Alpheus Commc'ns, LP,* Notice of Apparent Liability for Forfeiture, 25 FCC Rcd 8993, 8998, para. 12 & n.40 (EB 2010) (construing the failure to file timely network-outage reports as a continuing violation), *consent decree entered, Alpheus Commc'ns Consent Decree*, 26 FCC Rcd 11169 (EB 2011). *But see BellSouth Telecommunications, LLC, d/b/a/ AT&T Southeast*, Order, 35 FCC Rcd 8940, 8942-43, para. 8 (2020) (interpreting a "continuing violation" more narrowly in the context of E-Rate filings seeking reimbursement and the annual service provider certification, by holding that such a violation exists only where there is ongoing improper conduct, not where there are ongoing consequences or effects from a discrete event). This matter is distinguishable on the facts. In *BellSouth*, the Commission treated the accuracy of each invoice filed with the Universal Service Administrative Company on a specific date as a violation when the invoice was issued. *Id.* Here, in contrast, however, the Commission has established an ongoing obligation for Named Entities to submit and keep publicly available information accurate via section 2.903 filings pursuant to the Secured Networks Act. This statute can be best understood as mandating an on-going disclosure regime necessary for national security. *See Texas v. United States*, 891 F.3d 553, 561-62 (5th Cir. 2018) ("[C]ontinuing violations doctrine applies when a court determines that a statute or regulation is most naturally read as treating injuries as ongoing or continually accruing.").

[72] 47 CFR § 2.903(d).

[73] *See* 47 CFR § 2.903(d); *see supra* n.4.

[74] For example, when we apply the $3,000 base forfeiture daily starting on March 8, 2023, a Named Entity would have needed to comply with section 2.903(d) of the Commission's rules before May 10, 2023 (63 days from the filing deadline) for the aggregate base forfeiture to remain within the $188,491 statutory maximum (63 days x $3,000 = $189,000).

basis for the duration of the apparent violation would exceed the statutory maximum, we do not consider whether any factors for upward adjustment are warranted. In evaluating the statutory factors for a potential downward adjustment, we find no basis to reduce the proposed forfeiture amount.

18. Finally, although Hytera and ZTE submitted a list of associated entities in response to their respective LOIs, those submissions were not made publicly available; those filings therefore failed to meet both the procedural requirements and the fundamental purpose of the Commission's rule: to ensure transparency and to enable all interested parties to identify entities associated with the Named Entities involved in the production of covered equipment.[75] We therefore order Hytera and ZTE each to submit to the Commission an update of their most recent section 2.903(d) disclosures with the full names of, and contact information for, all of their respective subsidiaries and affiliates identified on the Covered List as producing covered communications equipment.

IV. CONCLUSION

19. We therefore determine that Hytera and ZTE each apparently willfully and repeatedly violated section 2.903(d) of the Commission's rules.[76] As such, Hytera and ZTE are each apparently liable for a forfeiture of $188,491.

V. ORDERING CLAUSES

20. Accordingly, **IT IS ORDERED** that pursuant to section 503(b) of the Act, 47 U.S.C. § 503(b), and section 1.80 of the Commission's rules, 47 CFR § 1.80, Hytera Communications Corporation Ltd is hereby **NOTIFIED** of this **APPARENT LIABILITY FOR A FORFEITURE** in the amount of one hundred eighty-eight thousand, four hundred ninety-one dollars ($188,491) for willful and repeated violations of section 2.903(d) of the Commission's rules, 47 CFR § 2.903(d).

21. **IT IS FURTHER ORDERED** that, pursuant to section 503(b) of the Act, 47 U.S.C. § 503(b), and section 1.80 of the Commission's rules, 47 CFR § 1.80, ZTE Corporation is hereby **NOTIFIED** of this **APPARENT LIABILITY FOR A FORFEITURE** in the amount of one hundred eighty-eight thousand, four hundred ninety-one dollars ($188,491) for willful and repeated violations of section 2.903(d) of the Commission's rules, 47 CFR § 2.903(d).

22. **IT IS FURTHER ORDERED** that, pursuant to section 2.903(d) of the Commission's rules, 47 CFR § 2.903(d), within thirty (30) calendar days of the release date of this Notice of Apparent Liability for Forfeiture and Order, Hytera Communications Corporation Ltd and ZTE Corporation **SHALL EACH FILE** a written statement updating their most recent section 2.903(d) submissions to the Commission with the full names and contact information for all of their subsidiaries and affiliates identified on the Covered List as producing covered communications equipment.

23. **IT IS FURTHER ORDERED** that, pursuant to section 1.80 of the Commission's rules, 47 CFR § 1.80, within thirty (30) calendar days of the release date of this Notice of Apparent Liability for Forfeiture and Order, Hytera Communications Corporation Ltd and ZTE Corporation **SHALL EACH PAY** the full amount of the proposed forfeiture or **SHALL EACH FILE** a written statement seeking reduction or cancellation of the proposed forfeiture consistent with paragraph 26 below.

24. In order for Hytera Communications Corporation Ltd, and ZTE Corporation to pay the proposed forfeiture, Hytera Communications Corporation Ltd and ZTE Corporation shall notify the Spectrum Enforcement Division at EB-SED-Response@fcc.gov of its intent to pay, whereupon an invoice will be posted in the Commission's Registration System (CORES) at https://apps.fcc.gov/cores/userLogin.do. Upon payment, Hytera Communications Corporation Ltd and ZTE Corporation shall send electronic notification of payment to Spectrum Enforcement Division, Enforcement Bureau, Federal Communications Commission, at EB-SED-Response@fcc.gov on the date said payment is made. Payment of the forfeiture must be made by credit card using CORES at

[75] *See supra* paras. 7-8.

[76] 47 CFR § 2.903(d).

https://apps.fcc.gov/cores/userLogin.do, ACH (Automated Clearing House) debit from a bank account, or by wire transfer from a bank account. The Commission no longer accepts forfeiture payments by check or money order. Below are instructions that payors should follow based on the form of payment selected:[77]

- Payment by wire transfer must be made to ABA Number 021030004, receiving bank TREAS/NYC, and Account Number 27000001. In the OBI field, enter the FRN(s) captioned above and the letters "FORF". In addition, a completed FCC Form 159[78] or printed CORES form[79] must be faxed to the Federal Communications Commission at 202-418-2843 or e-mailed to RROGWireFaxes@fcc.gov on the same business day the wire transfer is initiated. Failure to provide all required information in FCC Form 159 or CORES may result in payment not being recognized as having been received. When completing FCC Form 159 or CORES, enter the Account Number in block number 23A (call sign/other ID), enter the letters "FORF" in block number 24A (payment type code), and enter in block number 11 the FRN(s) captioned above (Payor FRN).[80] For additional detail and wire transfer instructions, go to https://www.fcc.gov/licensing-databases/fees/wire-transfer.
- Payment by credit card must be made by using CORES at https://apps.fcc.gov/cores/userLogin.do. To pay by credit card, log-in using the FCC Username associated to the FRN captioned above. If payment must be split across FRNs, complete this process for each FRN. Next, select "Manage Existing FRNs | FRN Financial | Bills & Fees" from the CORES Menu, then select FRN Financial and the view/make payments option next to the FRN. Select the "Open Bills" tab and find the bill number associated with the NAL Acct. No. The bill number is the NAL Acct. No. with the first two digits excluded (e.g., NAL 1912345678 would be associated with FCC Bill Number 12345678). After selecting the bill for payment, choose the "Pay by Credit Card" option. Please note that there is a $24,999.99 limit on credit card transactions.
- Payment by ACH must be made by using CORES at https://apps.fcc.gov/cores/userLogin.do. To pay by ACH, log in using the FCC Username associated to the FRN captioned above. If payment must be split across FRNs, complete this process for each FRN. Next, select "Manage Existing FRNs | FRN Financial | Bills & Fees" on the CORES Menu, then select FRN Financial and the view/make payments option next to the FRN. Select the "Open Bills" tab and find the bill number associated with the NAL Acct. No. The bill number is the NAL Acct. No. with the first two digits excluded (e.g., NAL 1912345678 would be associated with FCC Bill Number 12345678). Finally, choose the "Pay from Bank Account" option. Please contact the appropriate financial institution to confirm the correct Routing Number and the correct account number from which payment will be made and verify with that financial institution that the designated account has authorization to accept ACH transactions.

25. Any request for making full payment over time under an installment plan should be sent to: Chief Financial Officer—Financial Operations, Federal Communications Commission, 45 L Street, NE, Washington, D.C. 20554.[81] Questions regarding payment procedures should be directed to the

[77] For questions regarding payment procedures, please contact the Financial Operations Group Help Desk by phone at 1-877-480-3201 (option #6).

[78] The FCC Form 159 is accessible at https://www.fcc.gov/licensing-databases/fees/fcc-remittance-advice-form-159.

[79] Information completed using the Commission's Registration System (CORES) does not require the submission of an FCC Form 159. CORES is accessible at https://apps.fcc.gov/cores/userLogin.do.

[80] Instructions for completing the form may be obtained at http://www.fcc.gov/Forms/Form159/159.pdf.

[81] *See* 47 CFR § 1.1914.

Financial Operations Group Help Desk by phone, 1-877-480-3201, or by e-mail, ARINQUIRIES@fcc.gov.

26. The written statement seeking reduction or cancellation of the proposed forfeiture, if any, must include a detailed factual statement supported by appropriate documentation and affidavits pursuant to sections 1.16 and 1.80(g)(3) of the Commission's rules.[82] The written statement must be mailed to the Office of the Secretary, Federal Communications Commission, 45 L Street, NE, Washington, D.C. 20554, ATTN: Enforcement Bureau – Spectrum Enforcement Division, and must include the NAL/Account Number referenced in the caption. The statement must also be e-mailed to EB-SED-Response@fcc.gov.

27. The Commission will not consider reducing or canceling a forfeiture in response to a claim of inability to pay unless the petitioner submits the following documentation: (1) federal tax returns for the past three years; (2) financial statements for the past three years prepared according to generally accepted accounting practices; or (3) some other reliable and objective documentation that accurately reflects the petitioner's current financial status.[83] Any claim of inability to pay must specifically identify the basis for the claim by reference to the financial documentation. Inability to pay, however, is only one of several factors that the Commission will consider in determining the appropriate forfeiture, and we retain the discretion to decline reducing or canceling the forfeiture if other prongs of 47 U.S.C. § 503(b)(2)(E) support that result.[84]

28. **IT IS FURTHER ORDERED** that a copy of this Notice of Apparent Liability for Forfeiture shall be sent by first class mail and certified mail, return receipt requested, to Hytera Communications Corporation Ltd., 8 Whatney, Unit 200, Irvine, CA 92618-2880 and to Patrick D. McPherson, Duane Morris LLP, 901 New York Avenue N.W., Suite 700 East, Washington, DC 20001-4795; Xu Ziyang, Executive Director and CEO, ZTE Corporation, ZTE Plaza, Keji Road South, Hi-Tech Industrial Park, Nanshan District, Shenzhen, Guangdong Province, China, and to Jennifer L. Richter, Esq., Akin Gump Straus Hauer & Feld LLP, Robert S. Strauss Tower, 2001 K Street, NW, Washington, DC 20006-1037.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch
Secretary

[82] 47 CFR §§ 1.16, 1.80(g)(3).

[83] 47 U.S.C. § 503(b)(2)(E).

[84] *See, e.g.*, *Ocean Adrian Hinson, Surry County, North Carolina,* Forfeiture Order, 34 FCC Rcd 7619, 7621, para. 9 & n.21 (2019); *Vearl Pennington and Michael Williamson*, Forfeiture Order, 34 FCC Rcd 770, paras. 18-21 (2019); *Fabrice Polynice, Harold Sido and Veronise Sido, North Miami, Florida*, Forfeiture Order, 33 FCC Rcd 6852, 6860-62, paras. 21-25 (2018); *Adrian Abramovich, Marketing Strategy Leaders, Inc., and Marketing Leaders, Inc.*, Forfeiture Order, 33 FCC Rcd 4663, 4678-79, paras. 44-45 (2018); *Purple Communications, Inc.*, Forfeiture Order, 30 FCC Rcd 14892, 14903-04, paras. 32-33 (2015); *TV Max, Inc., et al.*, Forfeiture Order, 29 FCC Rcd 8648, 8661, para. 25 (2014).

APPENDIX

Hytera Communications Corporation Ltd

Entities Identified in § 2.903(d) Filing	Entities Disclosed in the LOI Response but not Disclosed Pursuant to § 2.903(d) and Subsequently Identified as Potentially Producing Covered Communications Equipment
HMF Smart Solutions GmbH Norsat International Inc. Teltronic S.A. Unipersonal	Anhai Communications (Hong Kong) Company Limited Dongguan Hytera Communications Co., Ltd Dongguan Hytera Software Co, Ltd Haidesi Communications Co., Ltd. Haidesi Communications (Hong Kong) Company Limited Harbin Hytera Science & Technology Co., Ltd Hebi Tianhai Electronic Information System Co., Ltd Hebi Zhouda Communications Technology Co. HMF Smart Solutions (Austria) GmbH HMF Smart Solutions (Ecuador) S.A.S. HMF Smart Solutions SpA Hytera (Nanjing) Software Science & Technology Co., Ltd Hytera Technology (Dongguan) Co., LTD Hytera Co., Ltd. Hytera Communications (Australia) PTY LTD Hytera Communications (Canada) Inc. Hytera Communications (Germany) GmbH Hytera Communications (Hong Kong) Company Limited Hytera Communications India Private Limited Hytera Communications (UK) Co., Ltd Hytera Comunicacoes Do Brasil LTDA Hytera Information (Hong Kong) Company Limited Hytera International (Hong Kong) Company Limited Hytera International (UK) Co., Ltd. Hytera International Nigeria Limited Hytera International Technology Co., Ltd Hytera Project Corp. Hytera Technology (Hong Kong) Company Limited Hytera UK Co., Limited Hytera US Inc. Hytera Wenyuan (Hong Kong) Corporation Limited Nanjing Hytera Technology Co., Ltd Nanjing Zhouda Communication Technology Co., Ltd PT. Hytera Communications Indonesia SA Hytera (PTY) Ltd Shenzhen Baolong Hytera Science & Technology Co., Ltd Shenzhen Haides Communications Technology Co., Ltd Shenzhen HYT Science Technology Co., Ltd Shenzhen Hytera Communications Co., Ltd. Shenzhen Hytera Communications Technology Co., Ltd Shenzhen Hytera Technology Service Co., Ltd. Shenzhen Hytera Zhixin Software Co., Ltd Shenzhen Jike Communication Equipment Co., Ltd Shenzhen Norsat Satellite Communications Co. Ltd. Shenzhen Norsat Science & Technology Co, Ltd. Teltronic Corporation, S.L.U.

Entities Identified in § 2.903(d) Filing	Entities Disclosed in the LOI Response but not Disclosed Pursuant to § 2.903(d) and Subsequently Identified as Potentially Producing Covered Communications Equipment
	Tianjin Hytera Information Technology Co., Ltd. UGAC (Hong Kong) High-Tech Company Limited Uliton Communication Service Co., LTD

ZTE Corporation

Entities Identified in § 2.903(d) Filing	Entities Disclosed in the LOI Response Identified as Producing Covered Communications Equipment Not Already Disclosed Pursuant to § 2.903(d)
Nubia Technology Co., Ltd.	CRS Technology Co., Ltd. Nubia (Hong Kong) Company Limited Sanechips Technology Co., Ltd. Shenzhen Zhongxing Software Company Limited Shenzhen ZTE Technology & Service Company Limited SuZhou LaXense Technology Co., Ltd. Zhongxing Photonics Technology Co., Ltd. ZTE (H.K.) LIMITED ZTE KANGXUN TELECOM CO., LTD. ZTE (Nanjing) Co., Ltd. Xi’an ZTE Terminal Technology Co., Ltd.