

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of )
)
Zhejiang Dahua Technology Co., Ltd. ) File No.: EB-SED-25-00038004
) NAL/Acct. No.: 202632100001
) FRN: 0021050992

NOTICE OF APPARENT LIABILITY FOR FORFEITURE

Adopted: February 12, 2026

Released: February 19, 2026

By the Commission:

I. INTRODUCTION

1. We propose a penalty of \$188,491 against Zhejiang Dahua Technology Co., Ltd. (Zhejiang Dahua or Company), an entity named on the Federal Communications Commission’s (FCC or Commission) Covered List,1 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.2 Based on the facts set forth below, we find that Zhejiang Dahua failed to make the required filing with the Commission by the March 8, 2023 deadline.3 It is essential that the Commission, and all other relevant stakeholders, have access to clear, transparent, and readily available information identifying the specific entities that are associated with entities named on the Covered List.4 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.5

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.

2 See 47 CFR § 2.903(d). The inclusion of entities named on the Covered List is read to include the subsidiaries and affiliates of such entities. See Covered List. 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, FCC 25-71, 2025 WL 3677904 (Oct. 29, 2025) (amended section 2.903 by redesignating paragraph (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, 2.903(d).

3 See 47 CFR § 2.903(d)(1); Protecting Against National Security Threats to the Communications Supply Chain through the Equipment Authorization Program, ET Docket No. 21-232; Protecting Against 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, 13566, para. 186 (2022) (2022 Equipment Authorization Security Report and Order).

4 2022 Equipment Authorization Security Report and Order at 13565-66, para. 185.

5 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).

## 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 “video surveillance and telecommunications equipment produced by . . . Dahua Technology Company” when used “[f]or the purpose of public safety, security of government facilities, physical security surveillance of critical infrastructure, and other national security purposes.”<sup>6</sup> 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.<sup>7</sup> As part of furthering 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.<sup>8</sup>

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 affiliates and subsidiaries) named in the 2019 NDAA.<sup>9</sup> These companies are: Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, and Dahua Technology Company.<sup>10</sup> 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 authorization application for any “covered” equipment that is on the Covered

---

<sup>6</sup> See National Defense Authorization Act for Fiscal Year 2019, Pub. L. No. 115-232 at § 889(f)(3)(B) (2018) (2019 NDAA).

<sup>7</sup> See Secure Networks Act.

<sup>8</sup> 47 U.S.C. § 1601(b), (d); 2019 NDAA § 889(f)(3).

<sup>9</sup> 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.1. The Commission has subsequently updated the Covered List to identify additional entities. See *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); *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); *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) (adding Kaspersky Lab, Inc. to the Covered List); *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) (adding Pacific Networks Corp and its wholly-owned subsidiary ComNet (USA) LLC and China Unicom (Americas) Operations Limited to Covered List); *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) (adding AO Kaspersky Lab, China Telecom (Americas) Corp., and China Mobile International USA Inc. to the Covered List). For simplicity, we will refer to the entities identified by name on the Covered List as “Named Entities.”

<sup>10</sup> 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. 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) (First Dahua LOI Response).

List.<sup>11</sup> 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.<sup>12</sup> This rule requires each entity named on the Covered List (Named Entity) to provide to the Commission contact information for itself, its affiliates, and subsidiaries within thirty (30) days of the Report and Order's publication (i.e., by March 8, 2023),<sup>13</sup> and to submit updates within thirty (30) days of publication of an updated list<sup>14</sup> or any subsequent changes.<sup>15</sup>

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 thus identified on the Covered List.<sup>16</sup> 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.<sup>17</sup> Maintaining an 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.<sup>18</sup>

## B. Factual Background

5. Zhejiang Dahua is a manufacturer of video surveillance equipment headquartered in Hangzhou, China.<sup>19</sup> Zhejiang Dahua is, and was from the beginning, a Named Entity.<sup>20</sup> On April 9, 2024, Zhejiang Dahua submitted a Notice of Change in Affiliates, informing the Commission that Dahua USA

---

<sup>11</sup> See Secure Equipment Act.

<sup>12</sup> See *2022 Equipment Authorization Security Report and Order* at 13566-67, para. 186; 47 CFR § 2.903. See also *supra* at n.2.

<sup>13</sup> 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 provides: 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* 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.

<sup>14</sup> 47 CFR § 2.903(d)(2).

<sup>15</sup> 47 CFR 2.903(d)(3).

<sup>16</sup> *2022 Equipment Authorization Security Report and Order* at 13566, para. 185.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

<sup>19</sup> See Reuters, *China's Dahua Technology to Exit Projects in Xinjiang*, (Dec. 23, 2024) <https://www.reuters.com/technology/chinas-dahua-technology-exit-projects-xinjiang-2024-12-23/> (last visited Feb. 2, 2026); Dahua Security, *Contact Us, Headquarters*, <https://www.dahuasecurity.com/aboutUs/contactUs> (last visited Feb. 2, 2026).

<sup>20</sup> See *supra* n.10.

was no longer an affiliate of Zhejiang Dahua.<sup>21</sup> This was the first filing submitted to the Commission by Zhejiang Dahua pursuant to section 2.903(d) of the Commission's rules.<sup>22</sup> However, the document did not include a list of Zhejiang Dahua's affiliates and subsidiaries that produce "covered" equipment along with their respective contact information, as required under section 2.903(d) of the Commission's rules.<sup>23</sup>

6. On March 21, 2025, the Commission announced investigations into several entities identified on the Covered List, including Zhejiang Dahua.<sup>24</sup> As part of the investigation, in response to the Enforcement Bureau's letter of inquiry,<sup>25</sup> Zhejiang Dahua submitted an initial list of its affiliates and subsidiaries on March 19, 2025,<sup>26</sup> and supplemented its listing on May 16, 2025.<sup>27</sup> These submissions were neither made publicly available nor filed in accordance with section 2.903(d) of the Commission's rules.<sup>28</sup> In fact, Zhejiang Dahua sought confidential treatment for these submissions, including the lists of affiliates and subsidiaries.<sup>29</sup> Subsequently, on September 22, 2025, Zhejiang Dahua submitted a list of its subsidiaries and affiliates and their contact information pursuant to section 2.903(d) of the Commission's rules.<sup>30</sup>

### III. DISCUSSION

7. We find that Zhejiang Dahua apparently willfully and repeatedly violated section 2.903(d) of the Commission's rules by failing to timely submit a list of its subsidiaries and affiliates and their contact information, as required of all entities named on the Commission's Covered List.<sup>31</sup> The filing was due on March 8, 2023, and Zhejiang Dahua made its filing pursuant to section 2.903(d) of the Commission's rules on September 22, 2025, after the Commission commenced its investigation.<sup>32</sup>

---

<sup>21</sup> Letter from Andrew D. Lipman, Counsel to Zhejiang Dahua Technology Co., Ltd., Morgan, Lewis & Bockius LLP, to Marlene H. Dortch, Secretary, FCC (Apr. 9, 2024) (April 9, 2024 Notice of Change in Affiliates).

<sup>22</sup> See April 9, 2024 Notice of Change in Affiliates.

<sup>23</sup> See *id.*; 47 CFR § 2.903(d)(1).

<sup>24</sup> *Carr Announces Sweeping New Investigations into CCP-Aligned Entities*, News Release (Mar. 21, 2025) <https://docs.fcc.gov/public/attachments/DOC-410318A1.pdf> (last visited Feb. 2, 2026).

<sup>25</sup> Letter of Inquiry from Spectrum Enforcement Division, FCC Enforcement Bureau to Dahua Technology Company (Feb. 26, 2025) (on file in EB-SED-25-00038004) (Dahua LOI).

<sup>26</sup> See First Dahua LOI Response.

<sup>27</sup> See Response to Letter of Inquiry from Dahua Technology Company to Spectrum Enforcement Division, FCC Enforcement Bureau (May 16, 2025) (on file in EB-SED-25-00038004) (Fourth Dahua LOI Response); see also Response to Letter of Inquiry from Dahua Technology Company to Spectrum Enforcement Division, FCC Enforcement Bureau (Apr. 2, 2025) (on file in EB-SED-25-00038004) (Second Dahua LOI Response); Response to Letter of Inquiry from Dahua Technology Company to Spectrum Enforcement Division, FCC Enforcement Bureau (Apr. 16, 2025) (on file in EB-SED-25-00038004) (Third Dahua LOI Response).

<sup>28</sup> See 47 CFR § 2.903(d).

<sup>29</sup> See First Dahua LOI Response; Fourth Dahua LOI Response; 47 CFR § 0.459 (requesting that materials or information submitted to the Commission be withheld from public inspection); *supra* n.16 (referencing the Commission's 2022 *Equipment Authorization Security Report and Order*, which emphasized the critical importance of publicly disclosing this information).

<sup>30</sup> 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).

<sup>31</sup> See 47 CFR § 2.903(d).

<sup>32</sup> See September 22, 2025 Notice of Subsidiaries and Affiliates; 47 CFR § 2.903(d)(1).

**A. Zhejiang Dahua Apparently Willfully and Repeatedly Violated Section 2.903(d) of the Commission’s Rules.**

8. All Named Entities are required to submit to the Commission contact information for the Named Entity in addition to a comprehensive list of their associated entities—which include subsidiaries and affiliates—that produce “covered” equipment and their respective contact information.<sup>33</sup> The Company, together with the other Named Entities on the Covered List, when the Commission adopted the *2022 Equipment Authorization Security Report and Order*, were required under section 2.903(d)(1) of the Commission’s rules to provide this information by March 8, 2023, and to submit updates within 30 days of any subsequent changes or modifications to the Covered List.<sup>34</sup>

9. Although the Company acknowledged its responsibility under section 2.903(d) when notifying the Commission of its divestiture of Dahua USA, it nonetheless failed to publicly submit a complete list of its subsidiaries and affiliates, as required by the Commission’s rules, along with their respective contact information.<sup>35</sup> This noncompliance 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.

**B. Proposed Forfeiture for Failure to File the Required Disclosure**

10. 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[.]”<sup>36</sup> Here, section 503(b)(2)(D) of the Act and section 1.80(b)(10) of the Commission’s rules authorize a forfeiture against Zhejiang Dahua of up to \$25,132 for each day of a continuing violation, up to a statutory maximum of \$188,491 for a single act or failure to act.<sup>37</sup> 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.”<sup>38</sup> 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.<sup>39</sup> 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.<sup>40</sup>

11. 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.<sup>41</sup> In this instance, Zhejiang Dahua failed to submit to the Commission contact information for each of its subsidiaries and affiliates that produce covered communications equipment by March 8, 2023, as required

---

<sup>33</sup> See *2022 Equipment Authorization Security Report and Order* at 13566, para. 185; 47 CFR § 2.903(d).

<sup>34</sup> 47 CFR § 2.903(d)(1)-(3).

<sup>35</sup> See *2022 Equipment Authorization Security Report and Order* at 13566-67, para. 186; 47 CFR § 2.903(d).

<sup>36</sup> 47 U.S.C. § 503(b)(1)(B).

<sup>37</sup> 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).

<sup>38</sup> 47 U.S.C. § 503(b)(2)(E).

<sup>39</sup> 47 CFR § 1.80(b)(11), Note 2 to paragraph (b)(11).

<sup>40</sup> *Id.*

<sup>41</sup> 47 CFR § 1.80(b)(11), Table 1 to paragraph (b)(11).

by section 2.903(d)(1) of the Commission’s rules.<sup>42</sup> For purposes of the Act, “continuing” is defined as continuing for more than one day.<sup>43</sup> Here, section 2.903(d) of the Commission’s rules provides that each entity named on the Covered List must provide the specified information “no later than March 8, 2023” and further provides that each entity must notify the Commission “of any changes to the information . . . no later than 30 days after such change occurs.”<sup>44</sup> The requirement to provide information and to update that information is a continuing obligation.<sup>45</sup> Here, 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. Only after the Commission commenced its investigation did Zhejiang Dahua submit a list of its affiliates and subsidiaries, along with their respective contact information, in accordance with section 2.903(d) of the Commission’s rules. As a result, its

---

<sup>42</sup> See 47 CFR § 2.903(d).

<sup>43</sup> 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).

<sup>44</sup> 47 CFR § 2.903(d).

<sup>45</sup> 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 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, however, the Commission has established an ongoing obligation for Named Entities to submit and keep publicly available information accurate via section 2.903 filings.

apparent violation of section 2.903(d) of the Commission's rules continued from March 8, 2023, until September 22, 2025, a period of more than two and a half years.<sup>46</sup>

12. Zhejiang Dahua's failure to file the required information publicly by March 8, 2023, as mandated by the Commission's rules, constitutes an apparent continuing violation.<sup>47</sup> As a result, the Company is liable for a forfeiture of \$3,000 for each day of that apparent continuing violation. When this base forfeiture is applied on a per-day basis starting on March 8, 2023, we quickly reach our statutory maximum penalty under section 503(b)(2)(D) of the Act.<sup>48</sup> Accordingly, we propose the statutory maximum forfeiture of \$188,491 for Zhejiang Dahua'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 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. Specifically, there is no indication that Zhejiang Dahua acted in good faith in failing to meet the March 8, 2023 deadline, and the Company's apparent violation was substantial considering the national security implications and the length of time.

#### IV. CONCLUSION

13. We therefore determine that Zhejiang Dahua apparently willfully and repeatedly violated section 2.903(d) of the Commission's rules.<sup>49</sup> As such, Zhejiang Dahua is apparently liable for a forfeiture of \$188,491.

#### V. ORDERING CLAUSES

14. 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, Zhejiang Dahua Technology Co., 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).

15. **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, Zhejiang Dahua Technology Co., Ltd. **SHALL PAY** the full amount of the proposed forfeiture or **SHALL FILE** a written statement seeking reduction or cancellation of the proposed forfeiture consistent with paragraph 18 below.

16. In order for Zhejiang Dahua Technology Co., Ltd. to pay the proposed forfeiture, Zhejiang Dahua Technology Co., Ltd. shall notify the Spectrum Enforcement Division at [EB-SED-Response@fcc.gov](mailto: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, Zhejiang Dahua Technology Co., Ltd. shall send electronic notification of payment to Spectrum Enforcement Division, Enforcement Bureau, Federal Communications Commission, at [EB-SED-Response@fcc.gov](mailto: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 <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

---

<sup>46</sup> Although Zhejiang Dahua submitted a list of associated entities in response to the Dahua LOI, that submission was not made publicly available; that filing 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. *See supra* n. 16.

<sup>47</sup> *See* 47 CFR § 2.903(d)(1); September 22, 2025 Notice of Subsidiaries and Affiliates.

<sup>48</sup> Indeed, when we apply the \$3,000 base forfeiture on a daily basis starting on March 8, 2023, Zhejiang Dahua 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).

<sup>49</sup> 47 CFR § 2.903(d).

or money order. Below are instructions that payors should follow based on the form of payment selected:<sup>50</sup>

- 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<sup>51</sup> or printed CORES form<sup>52</sup> must be faxed to the Federal Communications Commission at 202-418-2843 or e-mailed to [RROGWireFaxes@fcc.gov](mailto: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).<sup>53</sup> 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.

17. 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.<sup>54</sup> Questions regarding payment procedures should be directed to the Financial Operations Group Help Desk by phone, 1-877-480-3201, or by e-mail, [ARINQUIRIES@fcc.gov](mailto:ARINQUIRIES@fcc.gov).

18. 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

---

<sup>50</sup> For questions regarding payment procedures, please contact the Financial Operations Group Help Desk by phone at 1-877-480-3201 (option #6).

<sup>51</sup> The FCC Form 159 is accessible at <https://www.fcc.gov/licensing-databases/fees/fcc-remittance-advice-form-159>.

<sup>52</sup> 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>.

<sup>53</sup> Instructions for completing the form may be obtained at <http://www.fcc.gov/Forms/Form159/159.pdf>.

<sup>54</sup> See 47 CFR § 1.1914.

to sections 1.16 and 1.80(g)(3) of the Commission's rules.<sup>55</sup> 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](mailto:EB-SED-Response@fcc.gov).

19. 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.<sup>56</sup> 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.<sup>57</sup>

20. **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 Zhicheng Xu, Senior Vice President, Zhejiang Dahua Technology Co., Ltd., No. 1187, Bin'an Road, Binjiang District, Hangzhou, Zhejiang, China, and to Russell M. Blau, Esq., Morgan Lewis & Bockius LLP, 1111 Pennsylvania Ave NW, Washington, DC 20004.

FEDERAL COMMUNICATIONS COMMISSION

Marlene H. Dortch  
Secretary

---

<sup>55</sup> 47 CFR §§ 1.16, 1.80(g)(3).

<sup>56</sup> 47 U.S.C. § 503(b)(2)(E).

<sup>57</sup> 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).