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FCC Requires Disclosure of Foreign Adversaries' Interests in Entities With FCC Licenses or Authorizations

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On January 29, 2026, the Federal Communications Commission (FCC) adopted a decision on control of FCC-regulated businesses by "foreign adversaries." Under these rules, nearly every entity that is subject to FCC regulation would be subject to new ownership reporting requirements, including entities that do not regularly report ownership today, such as cable and satellite companies, entities holding FCC equipment authorizations, and entities with private radio licenses like those used for communication in factories or office buildings or by fleet managers. Penalties for failing to comply with the reporting requirements could include fines and revocation of licenses or other authorizations.

The new rules require the disclosure of foreign adversary interests by entities with direct ties to foreign adversaries, such as those with a principal place of business in a foreign adversary nation, and those that have 10% or greater direct or indirect voting or equity interests held by foreign adversaries, entities under the control of foreign adversaries, or citizens of foreign adversaries. Under the rules, any of these interests presumptively constitutes "control" by the foreign adversary, even if an entity formally is not under formal control of the adversary. Foreign adversaries are those designated by the Department of Commerce. The current foreign adversaries are Cuba, Iran, North Korea, the People's Republic of China, Russia and Nicholas Maduro, the deposed president of Venezuela. Entities that have interests described in the rules will be given an opportunity to rebut the presumption that they are under foreign adversary control.

The rules will divide regulated entities into three categories, each with different reporting requirements.

- "Schedule A" entities will be required to report whether or not foreign adversaries have disclosable interests under the FCC's standards. Schedule A includes all of the most significant industries regulated by the FCC – wireless providers, telecommunications companies, undersea cable operators, broadcasters, satellite companies and manufacturers of devices that require FCC approval before they can be sold in the US – as well as some other areas, such as IP-based telecommunications relay services and entities that operate licensed or registered earth stations (including receive-only earth stations).
- "Schedule B" entities will be required to file reports only if they actually have disclosable interests under the FCC's standard. Schedule B covers very small broadcasters (with fewer than six employees), as well as a variety of nonbroadband wireless services, including many private radio licensees.
- "Schedule C" entities will not be required to file reports. Schedule C includes devices that are authorized under the FCC's Supplier's Declaration of Conformity program (which do not have to obtain approval), amateur radio, ship and airplane radio operator licenses, and the General Mobile Radio Service.

All entities subject to the filing requirement will be required to make an initial filing on a date that will be set by the FCC. Additional filings may be required if the Department of Commerce designates new foreign adversaries, if an entity enters a new line of business that is covered by the rules, if the FCC decides to change the schedules to move a type of authorization into a new category, or if there is a change in ownership of an entity that affects its status as having disclosable interests by a foreign adversary.

If an entity reports that it has a disclosable interest, it will be required to provide detailed information on its ownership. This information would be available to the public. Based on that information, the FCC could take additional action, including requiring additional reporting, referring the entity to a national security review by other federal agencies or revoking its authorizations. Companies that fail to make required filings are subject to enforcement, including revocation of their authorizations

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