Utah State Board of Education

MEMORANDUM FOR RECORD

TO: Secondary and Postsecondary Educators, CTE Directors, and Procurement Officers

FROM: Utah State Board of Education (USBE) Career and Technical Education (CTE) Department.

DATE: 7 May 2026

SUBJECT: Guidance for Perkins on Unmanned Aircraft Systems (UAS) Procurement and Compliance (FCC 25-1086 / DA-26-22)

1. AUTHORITY AND PURPOSE: This memorandum provides USBE's CTE guidance regarding the procurement, use, and management of unmanned aircraft systems (UAS), commonly referred to as drones, in response to recent Federal Communications Commission (FCC) actions affecting FCC equipment authorization for certain UAS and UAS critical components under the Secure and Trusted Communications Networks Act and related national security determinations.

2. BACKGROUND: Effective December 22, 2025, the FCC added all foreign-manufactured UAS and critical UAS components to the Covered List. The Covered List restriction is prospective: "covered" equipment is generally prohibited from receiving new FCC equipment authorizations (typically required for importation/marketing/sale), while previously authorized device models are not automatically prohibited from continued use or continued sale/import of already-authorized models. These items are deemed to pose an unacceptable risk to national security.

On January 7, 2026, the FCC revised the Covered List entry to create a time-limited exemption (until January 1, 2027) for (a) UAS and UAS critical components on DCMA's Blue UAS Cleared List and (b) UAS/UAS critical components that qualify as "domestic end products" under the Buy American Standard (48 CFR 25.101(a)).

3. SCOPE: This guidance is specific to USBE Career and Technical Education (CTE) Perkins CTE programs and the use of Perkins V and related state CTE grants.

4. KEY DETERMINATION:

- Publicly Funded Purchases: USBE CTE-funded or federal grant-funded purchases should prioritize UAS/UAS components that are (a) eligible for FCC

equipment authorization and (b) aligned to federal “trusted” pathways, such as the Blue UAS Cleared List.

- Operational Status of Existing Fleets: Drones purchased and authorized prior to December 22, 2025, may continue to be operated for educational purposes.
- Exemptions: Only UAS listed on the Blue UAS Cleared List or verified as Buy American-compliant "domestic end products" (48 CFR 25.101(a)) are authorized for new procurement through January 1, 2027.

5. ACTION REQUIRED: Educators and administrators are directed to review the attached UAS Purchasing and Compliance Guide prior to any upcoming equipment solicitations. All current UAS inventories should be audited for data privacy compliance as outlined in the attachment.

For questions or concerns regarding this memorandum, contact Tomas Villegas at phone 385-707-5008/email tomas.villegas@schools.utah.gov , Libby Giles at phone 801-538-7875/email libby.giles@schools.utah.gov, or Wendi Morton at phone 801-538-7738/email wendi.morton@schools.utah.gov

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2 Attachments:
1. USBE UAS PURCHASING AND COMPLIANCE GUIDE (2026)
2. UAS VALIDATION AND SEARCH PRACTICES

Attachment 1:

USBE UAS PURCHASING AND COMPLIANCE GUIDE (2026)

A Concise Guide for Secondary and Postsecondary Educators

I. DO NOT PURCHASE: Per FCC and National Defense Authorization Act (NDAA) requirements, you may no longer purchase new models or components from the following:

- Restricted Brands: DJI (Da-Jiang Innovations), Autel Robotics, and their subsidiaries.
- Critical Components: This includes foreign-made flight controllers, cameras, sensors, and even smart batteries if they originate from restricted entities.
- Software: Any flight management software or cloud services hosted by the restricted entities above.
- Regulatory References:
    - FCC Covered List - Secure Networks Act –
        - https://www.fcc.gov/supplychain/coveredlist
    - FCC Updates on UAS Covered List –
        - https://www.fcc.gov/document/fcc-updates-covered-list-add-certain-uas-and-uas-components-0

II. APPROVED FOR PURCHASE: To ensure your program remains compliant and eligible for federal funding (Perkins), prioritize these categories:

1. Blue UAS Cleared List: These are drones vetted by the Department of Defense for security. Examples include Skydio, Teal Drones (Utah-based), Parrot, and Brinc: https://bluelist.appsplatformportals.us/UAS-Cleared-List/
2. Domestic End Products: Drones/components qualifying as “domestic end products” under 48 CFR 25.101(a) (manufactured in the U.S. and meeting the domestic component cost threshold; 65% applies for items delivered in calendar years 2024–2028).
3. Section 889 Compliant: Always ask your vendor for a "Section 889 Representation" form to guarantee they are not using restricted telecommunications equipment.
4. Exemption Details: https://www.fcc.gov/document/fcc-updates-covered-list-exempt-certain-drones-and-releases-faqs

III. GUIDANCE FOR EXISTING/LEGACY DRONES (DJI/AUTEL): If your classroom currently owns these drones, you are not required to ground them immediately, but you must adhere to these safety standards:

- No Wi-Fi Connection: Never connect "Covered List" drones to the school's internal Wi-Fi network.
- Local Storage Only: Use SD cards for all photos/videos. Do not sync flight logs to the manufacturer's cloud.
- Firmware Updates: The FCC's Office of Engineering and Technology issued a waiver (DA 26-69) allowing covered UAS and UAS critical components that were authorized prior to Dec. 22, 2025 to continue receiving software/firmware updates that mitigate harm to consumers at least until Jan. 1, 2027 (including security patches and OS compatibility updates).

IV. CHECKLIST FOR NEW PURCHASES

- ☐ Verify Funding Source: If using Perkins or Federal grants, the drone must be NDAA compliant.
- ☐ Request Proof of Origin: Ask the vendor: *"Is this drone on the current Blue UAS Cleared List?"*
- ☐ Check the Component List: Ensure the camera and radio transmission system are not from a restricted foreign company.
- ☐ Workforce Alignment: Remind students that many professional industries (utilities, government) now require "Blue UAS" proficiency. Training them on compliant hardware is a career advantage.

V. DATA PRIVACY AND ETHICS: Drones are flying data collection tools. As an educator, you have an ethical responsibility to know the risks associated with flight data and images that are collected by LEA/IHE UAS equipment. Additionally, as educators, you are doing your due diligence to ensure that UAS data is not being exfiltrated in a malicious manner. By moving toward Blue UAS and NDAA-compliant hardware, you are protecting student PII (Personally Identifiable Information) and aligning with USBE's commitment to cybersecurity.

Attachment 2:

UAS VALIDATION AND SEARCH PRACTICES

This guide is designed to help users understand how to verify whether a UAS or its components meet FCC requirements. Because rules, systems, and tools change often, this guide focuses on concepts rather than step-by-step instructions tied to a specific interface.

The goal is to help you think through the process so you can adapt, even as systems evolve.

Official FCC ID Search - https://www.fcc.gov/oet/ea/fccid

Why FCC Verification Matters

UAS equipment often uses radio frequencies to communicate. The FCC regulates these frequencies to prevent interference and ensure safe operation.

Before purchasing a UAS, confirming FCC approval helps ensure:

- The device is legally authorized for use
- It meets communication standards
- It will not cause interference with other systems

Understanding the FCC ID

An FCC ID is a unique identifier assigned to a device that has been approved under FCC rules.

Key Characteristics

- It includes two parts:
    - A Grantee Code (usually 3 to 5 characters)
    - A Product Code (remaining characters)

Examples:

- SS3-DEP125
- 2A9Z7-TD000

What This Means Conceptually: The FCC ID acts like a fingerprint. It connects a device to official records that describe how it was tested and approved.

Core Verification Process (Conceptual)

Rather than focusing on exact buttons or fields, think of the process as three main steps:

1. Locate the FCC ID - Find the FCC ID on the product, packaging, or documentation.
2. Search for the ID using an official source.
    a. High level qualifiers:
        i. Enter the Grantee Code
        ii. Enter the Product Code
        iii. Run a search
    b. The exact layout of the tool may change over time, but the concept remains the same.
3. Confirm the Details Match. Once results appear, verify that the record matches the product you are evaluating.
    a. Look for supporting materials such as:
        i. User manuals
        ii. External photos
        iii. Technical descriptions

These help confirm that the FCC ID is tied to the correct device.

Evaluating Documentation

FCC records often include exhibits submitted by the manufacturer. What to Look For:

- Product images that match the item
- Descriptions of features or functions
- Documentation that supports the intended use

Important Considerations

- These materials are provided by the applicant, not independently verified
- Some documents may be withheld under regulatory rules

Safety and Risk Awareness

When reviewing FCC documentation online, keep the following in mind:

- Files may come from external sources
- There is no guarantee that files are free from malware

Best Practice:

- Use updated antivirus software
- Avoid downloading files unless necessary
- View documents in a secure environment when possible

Adapting to Changing Requirements

FCC rules, exemptions, and systems can change over time. For example, certain exemptions may have expiration dates that affect how devices are approved.

To stay effective:

- Focus on understanding the structure of FCC IDs
- Use official sources whenever possible
- Verify information using multiple forms of documentation
- Stay aware of policy updates that may affect eligibility

Key Takeaways

- FCC IDs are essential for verifying UAS compliance
- The verification process follows consistent logic, even if tools change
- Always confirm that the FCC record matches the actual product
- Treat supporting documents carefully and securely
- Stay flexible as regulations evolve

Final Thought

This process is less about memorizing steps and more about building a method. If you understand how FCC IDs connect devices to official records, you can confidently navigate changes in tools, policies, and requirements over time.