



November 10, 2025

The Honorable Brendan Carr
Chairman
Federal Communications Commission
45 L Street NE
Washington, DC 20554

**Re: FCC Proposed Updates to the Covered List Concerning Connected Vehicles
and Vehicle Suppliers Meeting Request**

Dear Chairman Carr:

On behalf of MEMA, The Vehicle Suppliers Association,¹ we appreciate and share the Administration's and Federal Communications Commission's (FCC's or Commission's) commitment to national security and supports efforts to implement the directives of Executive Order 13873.² As the Commission considers action to update its Covered List pursuant to the January 2025 connected vehicles determination from the Department of Commerce's Bureau of Industry and Security (BIS),³ MEMA respectfully urges FCC to reconsider its proposal which could result in duplicative and/or inconsistent obligations that will create compliance burdens for vehicle suppliers.

MEMA filed comments and has engaged extensively with BIS and the Commission on this topic individually and as part of a multi-association coalition.⁴ As the FCC evaluates the feedback received to its proposal, MEMA respectfully requests that the FCC consider the following:

1. Refrain from Covered List action tied to BIS's connected vehicles rule absent a specific BIS determination naming an identified entity or product. The Covered List should not be used to reconstruct BIS's more systematic approach.
2. If the Commission believes further action is needed, consider harmonizing any FCC action with BIS's scope, timing, and authorizations. At minimum, MEMA recommends

¹ MEMA, The Vehicle Suppliers Association (MEMA) is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers and MEMA has been the voice of the supplier industry since 1904. MEMA's members design and manufacture the technology, components and services that enable the production of new vehicles, as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S.

² See Exec. Order No. 13,873, *Securing the Information and Communications Technology and Services Supply Chain*, 84 Fed. Reg. 22,689 (May 15, 2019).

³ See *Securing the Information and Communications Technology and Services Supply Chain: Connected Vehicles*, 90 Fed. Reg. ____ (Jan. 2025) (to be codified at 15 C.F.R. pt. 7).

⁴ See Comments of MEMA, The Vehicle Suppliers Association, Docket No. BIS-2024-0005-0031 (Apr. 2024); Docket No. BIS-2024-0005-0145 (Oct. 2024); see also Multi-Association Letter to The Honorable Brendan Carr & The Honorable Jeffrey Kessler (FCC & BIS) (Sept. 4, 2025).

that any FCC action should:

- Utilize the same scope as the BIS final rule.
- Incorporate BIS's implementation timeline and related provisions so that equipment lawful under BIS is not effectively barred by FCC implementation.
- Recognize BIS's compliance pathways—Declarations of Conformity, General Authorizations and Specific Authorizations—so regulated parties can rely on a single set of processes.
- Provide a coordination mechanism so that questions already resolved by BIS (e.g., through FAQs or advisory opinions) are effectuated for any overlapping FCC concerns. Similarly, FCC should coordinate with BIS on reporting requirements. BIS has already opened its platform, Compliance Application and Reporting System (CARS), for industry use. It is important that suppliers are not subject to duplicative reporting requirements.
- Maintain close interagency coordination between the FCC, BIS, Cybersecurity & Infrastructure Security Agency (CISA), and National Highway Traffic Safety Administration (NHTSA) before finalizing any action.

Impacts on U.S. Suppliers and Consumers if Misaligned.

Any misalignment between the agencies falls hardest on suppliers who design, develop, and manufacture the covered hardware and software. Even minor divergence could: (i) force duplicative certification and documentation; (ii) strand otherwise lawful software, products, or parts inventories; (iii) delay deployment of safety features; (iv) interrupt fleet operations; and (v) create inconsistent barriers to entry that could disadvantage U.S. suppliers.

Conclusion

MEMA members would welcome the opportunity to participate in a technical briefing with the FCC's Public Safety and Homeland Security Bureau and/or OET to walk through vehicle architectures and systems impacted by the connected vehicles proceeding and to share the impact of the proposed rules on our unique industry.

MEMA is grateful for your leadership and for the FCC's focus on eliminating redundant and inconsistent regulations. With targeted interagency coordination, the Commission can ensure that any final action reinforces BIS's framework, protects national security, and maintains American competitiveness. For additional information, please contact Ana Meuwissen, Senior Vice President, Government Affairs at ameuwissen@mema.org or Emily Sobel, Senior Manager, Regulatory Policy at esobel@mema.org.



The Vehicle Suppliers Association

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ana".

Ana Meuwissen

Senior Vice President of Government Affairs

Cc: Scott Delacourt, Chief of Staff, Federal Communications Commission
Adam Chan, Director, FCC Council on National Security, Federal Communications Commission
The Honorable Jeffrey Kessler, Under Secretary for Industry and Security, Bureau of Industry and Security, Department of Commerce