

The FCC Covered List Inverter Ban

What Solar and Storage Developers & Installers Need to Know

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As of July 30, 2026 — this paper reflects the regulatory record as of this date and will be updated as guidance develops.

Key Takeaways

- On July 28, 2026, the FCC added foreign-produced power inverters to its Covered List, immediately barring new equipment authorizations.
- Previously authorized inverter models remain legal to import, sell, and install — this is not a recall.
- The FCC holds a separate, already-adopted authority (47 CFR § 2.939(e), via FCC 25-71) that allows restrictions against continued importation and marketing of currently authorized foreign inverters, after a required 30-day public comment period.
- The ban applies to inverters with remote communication capability, and the exact definition of remote communications ability is awaiting further clarity.
- Meeting the FCC's domestic-production standard overlaps substantially with other credits, (Section 45X AMPC & Section 48E ITC bonus.)

1. What Happened, and Why It Matters

On July 28, 2026, the FCC's Public Safety and Homeland Security Bureau (PSHSB) added foreign-produced power inverters to the agency's Covered List (via Public Notice DA 26-786) citing national security threats.¹

The FCC's authority extends from Section 2 of the Secure and Trusted Communications Networks Act of 2019 (Secure Networks Act), codified at 47 U.S.C. §§ 1601–1609, and the agency's implementing rules at 47 CFR §§ 1.50002(a) and 1.50003. If a designated Executive Branch national security body sends the FCC a specific determination that a category of equipment poses an unacceptable national security risk then the Commission is required to add that equipment to the Covered List.²

This is not any passage of any new law; rather, existing guidelines within FCC authority have been activated to restrict power inverter authorizations and imports. Two National Security Determinations sent to the FCC on July 27, 2026 by an Executive Branch interagency body specifically cited the lack of a secure U.S. supply chain as well as the continuous inflow of foreign-produced (or controlled) inverters and inverter components. Further, the Executive Branch sought increased restrictions due to “the risk that remote connectivity could let foreign firms shut down inverters, exfiltrate data, or otherwise conduct a cyberattack against U.S. grid infrastructure.”³ Domestic manufacturers currently supply only a small share of the U.S. inverter market, so this action affects a large share of near-term solar and storage procurement.

2. What Is Covered

The Covered List entry itself reads:

"Foreign-produced power inverters, except power inverters which have been granted a Conditional Approval by DoW or DHS."

"Foreign-produced" is defined by reference to the federal Buy American Standard: an inverter is foreign-produced if it fails to qualify as a "domestic end product" under 48 CFR § 25.101(a). Coverage depends on a combination of where and how the device is produced rather than on the nationality or brand of the manufacturer. Any U.S. company branded inverter assembled outside of the USA is covered, while a foreign-owned company's inverter with both final assembly in a U.S. facility and that meets the domestic end product threshold is not.⁴

The remote-communication scope question

According to the underlying National Security Determination, the inverter definition applies to devices that "contain components that enable remote communication, control, sensing, data-collection, or monitoring through Wi-Fi, cellular, Bluetooth, or other similar connections."⁵ Questions remain regarding the definitions within the notice, and users should note that continued monitoring and due diligence is necessary. The FCC release explicitly states that regulations apply to power inverters that "contain components that enable remote communication" without a clear definition of the entire scope that constitutes communication. Off-grid or fully isolated systems without any over-the-air communication are outside the scope, but units that enable features such as dongle-based monitoring remain an open question.

3. When It Took affect

The Covered List update took affect immediately upon release of DA 26-786 on July 28, 2026. There is no phase-in period, grace window, or grandfather clause for new equipment authorization applications.

4. Prior-Authorized Devices Remain Authorized — For Now

As of this writing, inverter models that already hold FCC equipment authorization remain fully authorized. They may continue to be imported, sold, installed, and used. This is not a recall, and it does not require removal of equipment already in the field.⁶

The mechanism the FCC could use to change that

In FCC 25-71 (Second Report and Order and Second Further Notice of Proposed Rulemaking, ET Docket No. 21-232), the Commission revised 47 CFR § 2.939 to add a specific mechanism: OET and PSHSB may limit the scope of any existing authorization on covered equipment to prohibit continued importation while explicitly not revoking the underlying authorization and not affecting continued use of equipment already in the field.⁷ This is distinct and different from full revocation under the pre-existing § 2.939(a)(4).⁸ The § 2.939(e) mechanism, however, is not self-executing. Before it can be applied to any equipment category, OET and PSHSB must issue a dedicated public notice identifying the specific class of equipment, provide a minimum 30-day public comment period, and then make a determination. The Commission's order directs OET and PSHSB to institute such proceedings "as soon as practicable" for equipment already on the Covered List, and simultaneously with future Covered List additions going forward.⁹ In short, current authorized inverters remain at risk that § 2.939(e) could be activated in the future to restrict further importation/marketing of currently authorized units (after a 30 day period) via current, existing regulatory frameworks.

As of this writing, no such public notice has been issued specifically for power inverters. The authority exists and the FCC has been directed to consider using it — but a separate procedural step, with public comment, is required before continued importation and marketing of already-authorized foreign inverters could be restricted. Manufacturers, installers and users are encouraged to monitor FCC policy going forward to ensure protections against supply chain interruptions and to ensure you remain a part of the public comment period.

Continued firmware and security updates

Separately, OET issued a waiver the same day permitting previously authorized inverters (and advanced robotic devices) to continue receiving software and firmware updates that patch vulnerabilities and maintain compatibility, through at least January 1, 2029.¹⁰

5. How to Comply Going Forward

For any inverter model not yet authorized, there are effectively two paths to market:

A. Meet the domestic end product test

Manufacture the unit in the United States to satisfy the Buy American Standard end product definition within 48 CFR § 25.101(a). This relies on a combination of final assembly location and the proportion of component domestic costs. The specific cost-threshold mechanics are a Federal Acquisition Regulation (FAR) test rather than FCC-specific, so sourcing/legal counsel familiar with FAR domestic content determinations should verify any specific compliance claim before any public declarations. Manufacturers interested in verifying their compliance claim are encouraged to reach out to Pulsar Industries for more information.

B. Obtain a Conditional Approval

A foreign producer may seek Conditional Approval from the Department of War or the Department of Homeland Security, exempting a specific device or class of devices from the Covered List if the agency determines the device does not pose the identified risks. The process requires submission of information specified in the Power Inverters Guidance Document.¹¹ Additional clarifications and direct FCC contacts can be found in the Annex A: Guidance on Submissions for Conditional Approval for *Foreign-Produced Power Inverters* Subject to the FCC's Covered List.

Conditional Approval Friction Points

The Conditional Approval pathway requires that applicants open their supply chain and manufacturing strategies to federal audit for the FCC to “ultimately judge whether the power inverter producer poses “unacceptable risks.”” Manufacturers are rightfully protective of bills of material, critical component suppliers and software/source code, and this compounds the difficulty of a conditional approval. Manufacturers are encouraged to take note that the FCC states “DoW and DHS may request additional information as necessary” and software has not been addressed; take action now in the event that software submission requirements are clarified in the coming days or weeks.¹² End users and installers are encouraged to verify long-term compliance with their manufacturers, and manufacturers are encouraged to contact Pulsar for more information.

6. FCC Compliance Overlap with Additional (and Significant) Tax Credits

The domestic-sourcing changes required to satisfy the FCC's Buy American Standard test substantially overlap with additional tax policy/credits, and this author recommends manufacturers consider capturing all incentives to achieve the best landed cost. The domestic content requirements tied to two federal tax incentives are:

- Section 45X Advanced Manufacturing Production Credit: a per-unit production credit for eligible components manufactured in the U.S., subject to Prohibited Foreign Entity (FEOC) and Material Assistance Cost Ratio restrictions that have tightened under recent legislation.
- Section 48E Investment Tax Credit domestic content bonus adder: an additional credit percentage (on top of the base ITC) for projects meeting a minimum domestic content percentage threshold.

The practical point for readers: a company restructuring its supply chain to satisfy the FCC's domestic product requirements is already completing much of the work needed to also qualify for the 45X credit and the 48E domestic content bonus. Treating these as three separate compliance exercises wastes effort, yet treating them as one sourcing decision with three separate payoffs will create the most per unit value.

7. Where to Go for Continuing Information

This is a live regulatory situation. Treat this paper as a snapshot as of its publish date, and go to primary sources for anything that matters to an active procurement decision:

- FCC Covered List: the authoritative, continuously updated list, including any future Conditional Approvals granted for specific inverter models.
- PSHSB public notices: where any future action to limit existing authorizations would be formally proposed and opened for comment.
- The FCC's own published FAQ on the robotics/inverter Covered List additions, for plain-language agency answers as they're issued.
- Department of Energy public materials on inverter cybersecurity assessments, for more information underlying the technical risk debate.

8. How Pulsar Can Help

If you are an installer or manufacturer interested in securing your supply chain then contact Pulsar Industries today for further discussions. Pulsar Industries can tailor a solution for you and offer continuing tracking and guidance to keep you aware of future risks, opportunities and clarifications. This regulatory issue is subject to change, and the minimum days required for changes leaves little reaction time for businesses and their wider supply chain.

References

1. FCC Public Safety and Homeland Security Bureau, Announces Addition of Foreign-Produced Power Inverters and Advanced Robotic Devices to FCC Covered List, DA 26-786, WC Docket No. 18-89, ET Docket No. 21-232, EA Docket No. 21-233 (rel. July 28, 2026).
2. 47 U.S.C. §§ 1601–1609 (Secure and Trusted Communications Networks Act of 2019); 47 CFR §§ 1.50002(a), 1.50003.
3. *Power Inverters National Security Determination*, Appendix B to DA 26-786 (July 27, 2026).
4. DA 26-786, Appendix A (Covered List entry, updated July 28, 2026); 48 CFR § 25.101(a) (Buy American Standard, domestic end product definition).
5. *Power Inverters National Security Determination*, Appendix B to DA 26-786 (July 27, 2026).
6. FCC Fact Sheet, *Foreign-Produced Power Inverters and Advanced Robotic Devices Added to FCC Covered List* (rel. July 28, 2026).
7. FCC 25-71, Second Report and Order and Second Further Notice of Proposed Rulemaking, ET Docket No. 21-232 (rel. Oct. 29, 2025), ¶¶ 40–43, 50; 47 CFR § 2.939(e).
8. FCC 25-71 ¶¶ 32–37, 41 (discussing § 2.939(a)(4) and the extensive comment-record opposition to broad revocation of existing authorizations).
9. FCC 25-71 ¶¶ 45–48 (public notice and minimum 30-day comment period requirement; direction to OET/PSHSB to institute proceedings "as soon as practicable").
10. FCC Office of Engineering & Tech., Public Notice, *Waiver of Sections 2.932(b) and 2.1043(b) of the Commission's Rules for Covered Power Inverters and Covered Advanced Robotic Devices*, DA 26-789 (rel. July 28, 2026).

11. DA 26-786, Annex A: Guidance on Submissions for Conditional Approval for Foreign-Produced Power Inverters Subject to the FCC's Covered List (rel. July 28, 2026), <https://www.fcc.gov/sites/default/files/annex-a-guidance-conditional-approval-inverters.pdf>.

12. DA 26-786, Annex A, *supra* note 11 (quoting the "unacceptable risks" and "additional information as necessary" language).