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Hylio UAS Sections 848 & 889 NDAA Compliance Component Specification Sheet

Upon request, Hylio can configure any of its models to utilize the following critical components which are **NOT** "manufactured in a covered foreign country or by an entity domiciled in a covered foreign country". Thus, Hylio models configured with the below critical components would be legal for US Government entities to acquire or operate per FAR[5,6] and NDAA[1,2] rules. Please note that Hylio also offers commercial versions of its UAS that may not utilize the below components; therefore, it is crucial for the customer to specifically request NDAA compliant configurations from Hylio.

Critical Component	Sub Component	Specific Component Used	Manufacturer (Company)	Manufacturer Domicile (Country)	Country of Manufacture	Required or Optional	Testing	Validation
Flight Controller	Flight controller hardware	Blue Cube H7	SpektreWorks	Scottsdale, Arizona, USA	USA	Required	USA	USA
	Flight controller firmware	Hylio flight control firmware	Hylio, Inc.	Richmond, Texas, USA	USA	Required	USA	USA
Radios	Ground Control Telemetry Link	Microhard pMLTE 2.4Ghz MIMO Communication Module	MicroHard Systems Inc	Canada	Canada	Required*	USA	USA
Data Transmission Devices	Video Transmission	Microhard pMLTE 2.4Ghz MIMO Communication Module	MicroHard Systems Inc	Canada	Canada	Optional	USA	USA
Cameras	FPV Camera	Sony A6100 w/ Sigma 30mm f/1.4 DC DN Contemporary Lens	Sony Corporation	Japan	Japan/Thailand	Optional	USA	USA

		(Sony E)						
Gimbal	Gimbal for FPV Camera	GREMSY S1V3 Gimbal	Gremsy	Vietnam	Vietnam	Optional	USA	USA
Ground Control System	Ground Control Computer	Hylio GroundLink Ground Control Station & Radio Controller (utilizing Intel Core i5 13th Gen Raptor Lake Processor)	Hylio, Inc. (w/ Intel Corporation chip)	Richmond, Texas, USA	USA	Required*	USA	USA
Operating Software	Command and Control Software	AgroSol GCS	Hylio, Inc.	Richmond, Texas, USA	USA	Required	USA	USA
Network Connectivity	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Data Storage	Local log storage only	microSD card				Required*	USA	USA

*A telemetry connection between the Ground Station computer and the UAS is required for command and control; the Hylio GroundLink includes a Microhard pMLTE 2.4Ghz MIMO Communication Module which is used for data transfer between the ground station and the UAS.
*A Windows 10/11 based computing device is needed as a ground control device; customers can supply their own or Hylio, Inc. can provide the above listed Hylio GroundLink.

The majority of the components above can be exchanged with other components upon request by the customer. Clients may inquire with Hylio if they have any questions, comments, or concerns about the critical components or if they would like to exchange any of the components with other valid components.

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KEY DEFINITIONS[4]

Covered UAS: Any UAS and any related equipment that:

1. Are manufactured in a covered foreign country or by an entity domiciled in a covered foreign country;
2. Contain critical components, as defined in this document, manufactured in a covered foreign country or by an entity domiciled in a covered foreign country;
3. Use a ground control system or operating software developed in a covered foreign country or by an entity domiciled in a covered foreign country; or
4. Use network connectivity or data storage located in or administered by an entity domiciled in a covered foreign country

The term **"covered foreign country"** means the People's Republic of China.

The term **"place of manufacture"** has the definition provided in FAR 52.225-18, as the "place where an end product is assembled out of components, or otherwise made or processed from raw materials into the finished product that is to be provided to the Government." If a product is disassembled and reassembled, the place of reassembly is not the place of manufacture.

The following are included in the definition of **"critical components"**:

1. Flight controller: The combination of embedded software on computing hardware, that issues commands to actuators based on the difference between the desired and actual position of a UAS.
2. Radio: A device that enables communication by packaging, transmitting, and/or receiving modulated signals into or from electromagnetic waves in the radio frequency (RF) spectrum.
3. Data transmission device: Electronic hardware that actively transfers electronic information from one digital system to another.
4. Camera: A device that converts focused light onto a photosensitive sensor for the purpose of recording or transmitting visual images in the form of photographs, film, or video signals.
5. Gimbal: A mechanism, typically consisting of electromechanical actuators and a mechanical frame , which rotates about one or more axes to stabilize and properly orient cameras or other sensors.
6. Ground control system: An electronic mechanism that enables a human operator to transmit data in order to influence the actions of an aerial vehicle remotely.
7. Operating software: A program that directs a computer's basic functions, such as scheduling tasks, executing applications, and controlling peripherals.
8. Network connectivity: The hardware and software required for communication between computers over the internet or other distributed and separately administered systems, for example, through the use of routers, switches, and gateways.
9. Data storage: The collective methods and technologies that capture and retain digital information on electromagnetic, optical, or silicon-based storage media.

SIGNATURE PAGE

I, the undersigned, hereby certify that the statements made in this document are true, complete, and accurate to the best of my knowledge.

Company Name	Hylio, Inc.
Signature	
Company Representative Name	Arthur Erickson
Title	CEO/Co-Founder
Date	April 29, 2024

APPENDIX

1. FY2019 NDAA - Full Text

   Full digital version of FY2019 NDAA hosted on Congress.gov. Sec. 889 is found within.

2. FY2020 NDAA - Full Text

   Full digital version of FY2020 NDAA hosted on Congress.gov. Sec. 848 is found within.

3. Section 889 Policies - FAR Rules Issued by DoD, GSA, and NASA

   Explanation of DoD, GSA, and NASA issuing multiple rules amending the Federal Acquisition Regulation (FAR) to implement section 889 of the John S. McCain National Defense Authorization Act (NDAA) for Fiscal Year (FY) 2019 (Pub. L. 115-232).

4. DIU (Defense Innovation Unit) Fiscal Year 2020 NDAA Sec 848 Policy

   Policy guidance provided by the DIU (Defense Innovation Unit) on diu.mil which focuses on Sec. 848 of FY2020 NDAA. Outlines key definitions such as “Covered UAS”, “covered foreign country”, “place of manufacture”, and “critical components”.

5. FAR 52.204-24

   From the FAR (Federal Acquisition Regulation); section which prohibits US government entities from purchasing or using "covered telecommunications equipment or services". This section provides language with which the Offeror (Hylio, Inc.) can represent that they will NOT provide "covered telecommunications equipment or services" to the purchaser when the purchaser specifically requests so.

6. FAR 52.204-26

   From the FAR (Federal Acquisition Regulation); section which prohibits US government entities from purchasing or using "covered telecommunications equipment or services". This section provides language with which the Offeror (Hylio, Inc.) can represent that they will NOT provide "covered telecommunications equipment or services" to the purchaser when the purchaser specifically requests so.