

## Compliance Guidance: FAR 52.240-1 and University Drone Use

### Summary

FAR 52.240-1, effective November 12, 2024, prohibits federal agencies and federal contractors (including universities performing federal contracts) from:

1. Procuring unmanned aircraft systems (UAS) from 'covered foreign entities'; and
2. Operating such UAS in the performance of a federal contract after December 22, 2025.

### Permitted Use Cases (Not Covered by FAR 52.240-1)

University-owned drones (e.g., DJI) purchased with non-federal funds may be used for:

- Instructional activities
- Internal research not tied to federal funding
- Campus facilities or flight demos

...so long as they are NOT used to fulfill a federal contract or grant.

### Prohibited Use Cases (Covered by FAR 52.240-1)

The University must not:

- Procure or lease OJI or other covered UAS with federal funds after Nov 12, 2024
- Use such UAS in ANY federally funded project (including grants and contracts) after Dec 22, 2025

### Compliance Tip

Track each UAS unit's manufacturer, purchase source, and usage. Restrict use of DJI or similar drones in any federally funded activity after Dec 22, 2025.

### UAS Prohibited Manufacturers (not exhaustive)

#### **Autel Robotics Co., Ltd.**

A prominent drone manufacturer known for producing consumer and commercial unmanned aerial systems (UAS).

#### **Aerospace CH UAV Co., Ltd. (CH UAV)**

Specializes in the development and production of unmanned aerial vehicles, including military-grade drones.

#### **Chengdu IOUAV Automation Tech Co., Ltd. (IOUAV)**

Develops industrial-grade drones used in various applications, including mapping, surveying, and public safety.

#### **AEE Shenzhen Yidian Aviation Technology Co., Ltd.**

Involved in the design and manufacture of drones and related technologies, with applications in both civilian and military sectors.

**DJI (Shenzhen DJI Innovation Technology Co., Ltd.):** A leading global drone manufacturer, DJI has been designated as a Chinese military company. This designation has led to legal actions by DJI to contest the label.