Drone Dominance Program Supply Chain Framework (DDPSCF)
April 27, 2026

1. Introduction

The goal of this Framework (the DDPSCF) is to enable the Department of War (DoW) to purchase small unmanned aerial systems (sUAS) without any components, subcomponents or raw materials sourced from covered countries - principally China - at every tier of the supply chain and to promote the expansion of a domestic sUAS supply chain. We must have a resilient and secure sUAS supply chain and industrial base so we are prepared to rapidly deliver sUAS at meaningful scale in peacetime and during a conflict. Over the Drone Dominance Program's four phases, requirements progressively tighten from baseline NDAA compliance (already utilized in Phase I) toward a long-term preference for systems sourced and manufactured in the United States. This document provides industry with predictability on the direction and pace of those requirements so companies can make informed investment decisions now.

This DDPSCF will apply to Phases Two through Four of the DDP and will limit those systems eligible for orders. The DDPSCF is not a statutory framework, though it takes guidance from many statutory provisions, including some now in force and some with future compliance dates. The DDPSCF does not apply to all sUAS purchases within the DOW at the current time but industry could reasonably expect that the DoW will align around these standards over time in order to consolidate demand signal and assist with the scaling of a resilient defense industrial base for sUAS.

This is not just a compliance exercise. China controls critical chokepoints across the sUAS supply chain and has already begun restricting exports of UAS components. A contested supply chain is not a hypothetical risk - it is a present one. The DDP uses the purchasing power of a $1.1 billion advanced market commitment to create the demand signal that justifies private investment in domestic sUAS production capacity.

2. Purpose

This document establishes the phased supply chain requirements for the Drone Dominance Program (DDP), a $1.1 billion advanced market commitment to procure over 200,000 Group 1 one-way attack (OWA) small unmanned aerial systems (sUAS) across four phases. These systems are low-cost, and high-volume platforms, which affects both the feasibility and urgency of supply chain migration for various components. The supply chain migration schedule herein defines the minimum and preferred sourcing requirements for every major component of a sUAS system at each phase of the program.

The strategic objective is to build a resilient, scalable, non-foreign-dependent supply chain for sUAS production that can sustain procurement of millions of units annually by the United States and allied nations, even under conditions where China or others restrict or block the sale of upstream components.

Components from non-covered countries will be more expensive, at least initially. But it is actual demand for compliant components that will drive their costs down over time. Without real purchasing volume flowing through non-covered country supply chains, those supply chains will never achieve the scale economics needed to compete. The higher cost of non-covered country components is largely a function of low volume, and volume will only come from committed procurement. This is fundamentally a chicken-and-egg problem - one that the DDP is designed to break by creating a credible, multi-year demand signal.

3. Strategic Context

China controls critical chokepoints across the sUAS supply chain: rare earth separation and magnet production for motors (~92% of NdFeB magnet manufacturing per DOE 2020 data), lithium-ion battery cell manufacturing (top 3 CN producers make ~50% of global cells), PCB fabrication (~60% of global output), flight controller assembly (75%+ in CN), and key semiconductor packaging. FPV-class motor and ESC markets are also dominated by Chinese components. This concentration creates strategic supply chain risk primarily through supply coercion, production throttling, price

manipulation, and the ability to disrupt America's drone output at the precise moment when mass and speed matter most.

The DDP supply chain schedule adopts a nuanced approach that distinguishes between components requiring immediate trust (flight controllers, RF links, encryption, firmware, BMS) and those where a phased transition from allied to domestic sourcing is technically and economically feasible. This is directly in line with President Trump and Secretary Hegseth's direction to Unleash American Drone Dominance and consistent with the broader policy frameworks established by the NDAA and DFARS.

4. Compliance

Compliance will generally be governed with a system similar to the current Blue List, managed by DCMA. Systems and components from vendors invited to compete at each DDP phase will be self-certified and also evaluated by third-party assessors. Systems that have been evaluated previously in the DDP will only be required to do change analysis. DCMA will establish and publish a non-exhaustive list of components and subcomponents from covered countries that it has determined do not meet the DDP standards in order to accelerate industry's adoption of compliant supply chain elements.

This DDPSCF may evolve during execution. Any changes will be highlighted and posted on the Drone Dominance website in advance of follow-on phases.

5. How to Read the Supply Chain Migration Table

The table on the following pages provides the complete, component-level supply chain requirements for each DDP phase. Each row represents a component or subcomponent of a sUAS system. The columns are:

- **Phase 1 Requirement (Feb 2026):** The NDAA baseline.
- **Phase 2 Minimum (Aug 2026):** The floor for Phase II participation. Non-compliance is disqualifying.
- **Phase 2 Preferred (Aug 2026):** Attributes that will receive additional scoring weight. Signals the direction of travel.
- **Phase 3/4 Minimum and Preferred:** Progressively tighter requirements. Minimum columns represent the absolute standard for DDP purchases. Preferred columns signal what the DDP will reward and where the program is heading, which is generally toward US sourcing.

Supply chains that exceed stated expectations will be given credit in scoring weight during each phase.

6. Definitions and Covered Countries

This schedule references multiple legal constructs that are not interchangeable. Industry should apply the correct definition for each requirement:

American Security Drone Act (ASDA)-covered foreign entity: An entity included on the list maintained by the Federal Acquisition Security Council (FASC) and published on SAM.gov. This list is currently derived from the Consolidated Screening List and is broader than a drone-specific entity list. FAR 52.240-1 prohibits delivery and operation of UAS from these entities.

DFARS covered country (DFARS 252.225-7052): For magnets, tantalum, and tungsten restrictions: China, North Korea, Russia, and Iran. This is the DFARS-defined list and does not include Cuba or Venezuela.

Nearshored (program defined): Any countries in the Western Hemisphere that are not otherwise restricted by the Department of Commerce.

7. Supply Chain Migration Table

HOW TO READ THIS TABLE: Each row represents a consolidated component area. Phase 2 Minimum is the floor for DDP participation - non-compliance is disqualifying. Note that DDP targets are in excess of baseline NDAA compliance, which should be assumed as a minimum for all columns below. **Preferred columns (green)** signal direction of travel and receive scoring weight. Each phase's preferred requirement becomes the next phase's minimum.

ACRONYMS: AI/ML - Artificial Intelligence / Machine Learning | ASDA - American Security Drone Act (FY2024 NDAA Sec 1821-1833) | BMS - Battery Management System | CATL - Contemporary Amperex Technology Co., Limited | COMSEC - Communications Security | DDP - Drone Dominance Program | DFARS - Defense Federal Acquisition Regulation Supplement | DoD - Department of Defense | DoW - Department of War | EO - Electro-Optical | ESAD - Electronic Safe-and-Arm Device | EMSAD – Electro-Mechanical Safe and Arm Device | ESC - Electronic Speed Controller | FC - Flight Controller | FW - Firmware | GCS - Ground Control System | GNSS - Global Navigation Satellite System | IC - Integrated Circuit | IMU - Inertial Measurement Unit | IR - Infrared | ISP - Image Signal Processor | MCU - Microcontroller Unit | MIL-STD - Military Standard | MOSFET - Metal-Oxide-Semiconductor Field-Effect Transistor | NCC - Non-Covered Country (References DFARS definition) | NDAA - National Defense Authorization Act | OCM - Original Component Manufacturer | OS - Operating System | PCB - Printed Circuit Board | PCBA - Printed Circuit Board Assembly | RF - Radio Frequency | sUAS - Small Unmanned Aerial System | US - United States | USC - United States Code | VRX - Video Receiver | VTX - Video Transmitter

COMPONENT AREA	PHASE 2 MINIMUM Aug 2026	PHASE 2 PREFERRED Aug 2026	PHASE 3 MINIMUM Feb 2027	PHASE 3 PREFERRED Feb 2027	PHASE 4 MINIMUM Aug 2027	PHASE 4 PREFERRED Aug 2027
1. Flight Controller / Autopilot *(incl. processor, IMU, sensors, FC PCB, passive components, autopilot firmware)*	NCC assembly; no Sec 889 components; ASDA-compliant entity; electronic parts from OCMs or authorized distributors	NCC assembly; NCC PCB; firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC assembly; NCC PCB; firmware repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US assembly; US/nearshored PCB; NCC passives; firmware source code repo hosted and controlled by US entity and auditable upon request
2. Communications & Data Link *(incl. telemetry radio, VTX/VRX, RF transceiver ICs, antenna, PCB, passive components, encryption module/COMSEC, comms firmware)*	NCC assembly; no Sec 889 components; ASDA-compliant; electronic parts from OCMs or authorized distributors	NCC assembly; NCC PCB; firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC assembly; NCC RF ICs and PCB; encryption module (if applicable) from NCC source; encryption and comms firmware repos hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US/nearshored assembly, RF semiconductors and PCB; NCC passives; encryption and comms firmware source code repos hosted and controlled by US entity and auditable upon request
3. GNSS Module *(incl. receiver IC, PCB, passive components, GNSS firmware)*	NCC assembly; not from ASDA-covered entity; no Sec 889 components; electronic parts from OCMs or authorized distributors	NCC assembly; NCC PCB; firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC receiver module; NCC PCB; firmware repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US/nearshored receiver module; US/nearshored PCB; NCC passives; firmware repo hosted and controlled by US entity and auditable upon request
4. Electronic Speed Controllers *(incl. power MOSFETs, MCU, gate drivers, ESC PCB, passive components, ESC firmware)*	NCC assembly; not from ASDA-covered entity; electronic parts from OCMs or authorized distributors	NCC assembly; NCC PCB; firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC assembly; NCC PCB, MCU, and power semiconductors; firmware repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US assembly; US/nearshored power semiconductors, MCU and PCB; NCC passives; firmware repo hosted and controlled by US entity and auditable upon request
5. Companion Computer *(if equipped; incl. processor, AI/ML processor, PCB, passive components, embedded software/OS)*	NCC assembly; NCC processor; no Sec 889 networking components; electronic parts from OCMs or authorized distributors	NCC assembly; NCC processor and PCB; software source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC assembly; NCC processor and PCB; software repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US assembly; US/nearshored processor and PCB; NCC passives; software source code repo hosted and controlled by US entity and auditable upon request
6. PCBAs Other Than Listed *(incl. carrier boards, Remote ID transmitters, power distribution boards, interface boards, associated passive components, board firmware if applicable)*	NCC assembly; Remote ID not manufactured in covered foreign country; ASDA-compliant; electronic parts from OCMs or authorized distributors	NCC PCB fabrication and assembly for all trusted electronics boards; firmware (if applicable) source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC PCB fabrication and assembly; firmware (if applicable) repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US/nearshored PCB fabrication and assembly for all boards; NCC passives; firmware (if applicable) repo hosted and controlled by US entity and auditable upon request

COMPONENT AREA	PHASE 2 MINIMUM Aug 2026	PHASE 2 PREFERRED Aug 2026	PHASE 3 MINIMUM Feb 2027	PHASE 3 PREFERRED Feb 2027	PHASE 4 MINIMUM Aug 2027	PHASE 4 PREFERRED Aug 2027
7. Motors *(incl. magnets, rare earth feedstock, stator, bearings, housing)*	**NCC motor assembly**; specialty metals US/qualifying-country melted (10 USC 4863); ASDA-compliant entity	NCC motor assembly; DFARS-compliant magnet sourcing plan	*Same as Phase 2 Preferred*	NCC motor assembly, magnet production, and winding; disclosed rare earth feedstock origin	*Same as Phase 3 Preferred*	US/nearshored motor assembly and winding; NCC magnet production; NCC rare earth feedstock
8. Propellers, Airframe & Structural Components *(incl. propellers, carbon fiber frame, molded parts, fasteners, canopy, wiring harness, connectors)*	NCC assembly; specialty metals US/qualifying-country melted (10 USC 4863/4872); ASDA-compliant entity	NCC assembly and fabrication; NCC frame materials; NCC connectors and wiring	*Same as Phase 2 Preferred*	NCC assembly and fabrication; NCC frame materials; NCC connectors and wiring; Berry Amendment compliant fasteners	*Same as Phase 3 Preferred*	US/nearshored assembly, fabrication, frame materials, fasteners, connectors, and wiring
9. Batteries & BMS *(incl. cells, pack assembly, BMS electronics, BMS PCB, passive components, BMS firmware, cathode/anode materials; excl. battery chargers)*	**NCC pack assembly**; not from Sec 1260H or FY24 NDAA Section 154 listed entities (CATL); ASDA-compliant entity; electronic parts from OCMs or authorized distributors	NCC pack assembly; NCC BMS assembly and PCB; BMS firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC pack assembly; NCC cells compliant with Section 842 of the FY26 NDAA; NCC BMS assembly, PCB, and active components; BMS firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 3 Preferred*	US pack assembly; US manufactured cells, BMS assembly and PCB; NCC passives; BMS firmware source code repo hosted and controlled by US entity and auditable upon request
10. Imaging & Optics *(incl. EO cameras, IR/thermal sensors, image sensors, ISP, optics/lenses, PCB, passive components, camera firmware, gimbal if equipped)*	NCC PCBA; no Sec 889 components; ASDA-compliant entity; electronic parts from OCMs or authorized distributors	NCC camera/sensor assembly and PCB; camera firmware source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC camera assembly, image sensor, and PCB; camera firmware repo hosted and controlled by US entity and auditable upon request	*Same as Phase 3 Preferred*	US camera assembly; US/nearshored image sensor and PCB; NCC passives; camera firmware repo hosted and controlled by US entity and auditable upon request
11. Ground Control System *(incl. GCS hardware, GCS software, hand controller, PCB, passive components, other ground elements, encryption/COMSEC)*	NCC assembly; no Sec 889 components; electronic parts from OCMs or authorized distributors	NCC assembly and PCB; software source code repo not hosted in or administered from a covered foreign country	*Same as Phase 2 Preferred*	NCC assembly and PCB; all GCS software repos hosted and controlled by US entity and auditable upon request; encryption modules (if applicable) from NCC source	*Same as Phase 3 Preferred*	US hardware assembly; US/nearshored PCB; NCC passives; encryption modules (if applicable) meeting or exceeding current DoD standards; all GCS software source code repos hosted and controlled by US entity and auditable upon request
12. Fiber-Optic Tether *(if equipped; incl. optical fiber, spool mechanism, germanium dopant)*	ASDA-compliant entity for all elements	NCC spool mechanism	*Same as Phase 2 Preferred*	NCC fiber and spool	*Same as Phase 3 Preferred*	US/nearshored fiber and spool; NCC germanium
13. Payload / Lethality System *(incl. warhead, ESAD, fuzing electronics, fuzing PCB, energetics, fuzing/ESAD firmware, trainer munition)*	ESAD integrated; ASDA-compliant entity; fuzing electronic parts from OCMs or authorized distributors	NCC munition; NCC ESAD/EMSAD meeting MIL-STD-1316	*Same as Phase 2 Preferred*	US munition; US ESAD/EMSAD meeting MIL-STD-1316	*Same as Phase 3 Preferred*	US munition; US ESAD/EMSAD meeting MIL-STD-1316; US-sourced energetic materials (if applicable); US fuzing electronics with US PCB; NCC passives

Bolded text highlights notable Phase 2 changes from Phase 1

Exhibit A: Statutory and Regulatory Framework

The DDP supply chain requirements incorporate and in many cases accelerate the following statutory and regulatory mandates:

1 FAR 52.240-1 / American Security Drone Act

FAR Subpart 40.2 and clause 52.240-1 (November 2024) prohibit operation and delivery of UAS manufactured or assembled by American Security Drone Act-covered foreign entities, as listed by the Federal Acquisition Security Council (FASC) on SAM.gov. As of December 22, 2025, operating such UAS in contract performance is also prohibited. FY2020 NDAA Section 848 provides the basis for the Blue UAS List. DDP Phase I requires full compliance with FAR 52.240-1 and Blue UAS List accession.

Note: The FASC-covered foreign entity list published on SAM.gov is currently derived from the Consolidated Screening List and is broader than a drone-specific entity list. DFARS "covered country" (for magnets/tantalum/tungsten restrictions under DFARS 252.225-7052) is defined as China, North Korea, Russia, and Iran.

2 DFARS 252.225-7052: Magnets

Phase 1 (through 31 Dec 2026): NdFeB and SmCo magnets may not be melted or produced in a covered country, but Chinese rare earth feedstock is permitted. Phase 2 (effective 1 Jan 2027): Prohibition expands to the full mine-to-magnet supply chain, including mining, separation, refining, melting, and production. The DDP aligns Phase 3 (Feb 2027) with DFARS Phase 2, and DDP Phase 2 (Aug 2026) signals the preferred direction.

3 Battery Provisions

FY2024 NDAA Section 154 prohibits DoW battery procurement from six Chinese entities or their subsidiaries by October 2027. FY2025 NDAA (Public Law 118-159), Section 883, requires DoD to coordinate a battery strategy and report on sourcing, testing, and certification processes. FY2026 NDAA Section 842 includes a provision to address batteries from foreign entities of concern in new defense acquisitions. DDP policy targets for battery sourcing are more aggressive than current statutory minimums: Phase II (Aug 2026) requires non-covered-country pack assembly and incentivizes non-covered-country sourced cells. These DDP targets are program policy goals.

4 PCB Restrictions (10 U.S.C. 4873 / NDAA Sec 841)

Codified at 10 U.S.C. 4873, restrictions on sourcing defense PCBs and PCB assemblies from covered countries (China, Russia, North Korea, Iran) have an effective date discussed in multiple sources as January 1, 2027. DDP policy begins transition for mission-critical/trusted electronics PCBs at Phase II, with broader US PCB sourcing preferred by Phase IV.

5 Semiconductor Restrictions (NDAA Sec 5949)

NDAA Section 5949 (FY2023) prohibits procurement of covered semiconductor products and services from certain entities. A proposed FAR rule (Federal Register, February 2026) describes a statute-driven effective date of December 23, 2027. DDP uses Phase III onward to initiate supplier inquiries and readiness work for this prohibition, with the goal of full compliance by the statutory effective date.

6 Critical Minerals (Germanium)

China has imposed and adjusted export controls on germanium, creating supply uncertainty for allied downstream processors. Over 60% of germanium refining is concentrated in China and Russia. The DDP encourages non-Chinese sourcing for Germanium from Phase III onward. Where specific statutory procurement restrictions on these minerals are enacted, DDP will align accordingly.

7 Executive Order 14307

EO 14307, "Unleashing American Drone Dominance" (signed June 6, 2025; Federal Register June 11, 2025), establishes whole-of-government policy for American UAS leadership and includes procurement-related directives, including directing the FASC to publish a covered foreign entity list (per FY2024 NDAA Section 1822) and directing DoW to expand and update the Blue UAS List (referencing FY2020 NDAA Section 848). The DDP is aligned with EO 14307 objectives.

Note: The 65% domestic component cost threshold sometimes cited in connection with this EO is in fact the Buy American domestic content test under FAR 25.101, which requires that domestic component costs exceed 65% of total component cost for items delivered in calendar years 2024-2028. This is a FAR requirement, not an EO 14307 requirement.

8 Berry Amendment / Specialty Metals

10 USC 4862 (Berry Amendment) and 10 USC 4872 (Specialty Metals) require domestic sourcing for certain metals and materials in defense procurement. These apply to specialty steel, titanium, and other metals used in sUAS structural components and fasteners.

Exhibit B: Acceleration Beyond Statutory Requirements

The following table summarizes where DDP requirements accelerate beyond the statutory baseline. This acceleration is deliberate: the DDP is designed to create demand certainty that incentivizes supply chain investment, and waiting for statutory deadlines means losing the industrial window.

Component Area	Statutory / Regulatory Baseline	DDP Policy Target	Gap	Notes
Batteries	FY2024 Sec 154, prohibits DoW procurement from 6 Chinese companies by October 2027, FY2025 NDAA Sec 883: requires DoD battery strategy; FY2026 NDAA Sec 842: new-start UAS battery restrictions (Jan 2028 per statute)	100% non-covered-country pack assembly by Aug 2026 (Phase II)	**DDP ahead of statute**	Sec 883 directs strategy development, not phased percentages. DDP targets are program policy, not statutory mandates.
Motors	No explicit statutory motor prohibition for sUAS	100% non-covered-country motor assembly by Aug 2026 (Phase II)	**DDP-only**	Motor sourcing is entirely a DDP program requirement. No current statute mandates non-Chinese motors for Group 1 sUAS.
Magnets (NdFeB)	DFARS 252.225-7052 Phase 2: Jan 2027 (full-chain covered-country traceability for NdFeB in major defense systems)	Full-chain non-covered-country preferred by Feb 2027 (Phase III)	**Aligned**	DFARS 7052 covered countries are CN, NK, RU, IR. DDP aligns to the same timeline for sUAS magnets.
Defense PCBs	10 USC 4873 (Sec 841): prohibits procurement of certain PCBs from covered nations; effective Jan 2027	Trusted non-covered-country PCBs by Aug 2026 (Phase II)	**~5 months**	Statutory effective date is Jan 2027 per enacted law. DDP pulls this forward for critical flight-control PCBs.
Germanium	Sec. 844 of the FY2026 NDAA prohibits DoW procurement of germanium from non-allied nations effective Dec 18, 2027	Non-covered-country fiber preferred from Phase III (Feb 2027)	**~10 months**	China has imposed export controls on germanium (2023-present). DDP policy is driven by supply risk, not statutory mandate.
Semiconductors	Sec 5949: proposed FAR rule (Feb 2026 Federal Register) describes statutory effective date of Dec 23, 2027	Non-covered-country fab for critical ICs preferred by Feb 2027 (Phase III)	**~10 months**	Effective date is per proposed rule, not yet final. DDP initiates compliance work early given long semiconductor qualification cycles.