

Did you know that there is a Federal prohibition on the use of certain prohibited equipment/services and that Mines could lose federal grants and contracts if we use the prohibited equipment? The prohibition applies whether the equipment was purchased or received as part of a gift or donation.

What does this mean for Mines employees? Mines employees may not use “covered telecommunications equipment or services” for Mines related work. “Covered telecommunications equipment or services” is defined by law to encompass —

1. Telecommunications equipment produced by —
 - a. **Huawei Technologies Company,**
 - b. **ZTE Corporation,** or
 - c. any subsidiary or affiliate;
2. Video surveillance and telecommunications equipment produced by —
 - a. **Hytera Communications Corporation,**
 - b. **Hangzhou Hikvision Digital Technology Company,**
 - c. **Dahua Technology Company,**
 - d. or any subsidiary or affiliate; and
3. Telecommunications or video surveillance services provided by such entities or using such equipment.

What precautions should I take if I need telecommunications equipment to use for my work? Mines employees must practice due diligence before purchasing or accepting donations/gifts of any telecommunications or video equipment or services, to verify that the specific items are not included in this restriction. When procuring this type of equipment or services please check the manufacturer against the companies listed above. A basic search regarding subsidiary or affiliate relationships is recommended. If there is no match, then you can proceed with the purchase or accept the donation/gift.

You may have noticed an “Organization Restricted” notice when making purchases of this type of equipment through Amazon. Please be aware that this notice was put in place as a reminder of the restrictions, however, the restrictions are not just applicable to purchases made through Amazon. These restrictions are applicable to all purchases of this type of equipment no matter the source.

Already have personally own equipment produced by the vendors above? It is recommended you do not use that equipment to connect to Mines network nor to conduct business on behalf of Mines. It is recommended that individuals review their cell phones and home routers to determine if they own such covered equipment.

What about my Mines equipment that I already have? Information & Technology Solutions has reviewed equipment under its control to evaluate if it falls into the category of covered equipment and has verified compliance with the regulations. Equipment that is already on campus but that is not under ITS control should be checked against the companies listed above. Mines is currently aware that HP Printers, Series 400 and older have component parts that may

fall under the covered equipment list. If your department has this type of printer or comes across any other “covered telecommunications equipment or services” currently in use on campus or connected to Mines network, please contact Natalie Vega, Executive Director of Compliance, Policy & Risk Management, at nvega@mines.edu or Scot Allen in Research & Tech Transfer, exportcontrols@mines.edu.

The relevant prohibition appears in the [National Defense Authorization Act for FY 2019](#), Pub. L. No. 115-232 (NDAA). Specifically, Section 889 of the NDAA restricts the use of “covered telecommunications equipment or services.” Such equipment or services must not be used “as a substantial or essential component of any system, or as a critical technology as part of any system.”

If you have any questions, please contact Natalie Vega or Scot Allen (info above). Thank you in advance for your attention to this matter.

Currently identified subsidiaries/affiliates of Huawei Technologies Company and ZTE Corporation¹

Huawei Technologies Company

(Sources: business databases, Huawei Investment & Holding Co., Ltd., 2017 Annual Report)

1. Amartus, SDN Software Technology and Team
2. Beijing Huawei Digital Technologies, Co. Ltd.
3. Caliopa NV
4. Centre for Integrated Photonics Ltd.
5. Chinasoft International Technology Services Ltd.
6. FutureWei Technologies, Inc.
7. HexaTier Ltd.
8. HiSilicon Optoelectronics Co., Ltd.
9. Huawei Device Co., Ltd.
10. Huawei Device (Dongguan) Co., Ltd.
11. Huawei Device (Hong Kong) Co., Ltd.
12. Huawei Enterprise USA, Inc.
13. Huawei Global Finance (UK) Ltd.
14. Huawei International Co. Ltd.
15. Huawei Machine Co., Ltd.
16. Huawei Marine
17. Huawei North America
18. Huawei Software Technologies, Co., Ltd.
19. Huawei Symantec Technologies Co., Ltd.
20. Huawei Tech Investment Co., Ltd.
21. Huawei Technical Service Co. Ltd.
22. Huawei Technologies Cooperatief U.A.
23. Huawei Technologies Germany GmbH
24. Huawei Technologies Japan K.K.
25. Huawei Technologies South Africa Pty Ltd.
26. Huawei Technologies (Thailand) Co.
27. iSoftStone Technology Service Co., Ltd.
28. JV "Broadband Solutions" LLC
29. M4S N.V.

¹ This information is adapted from the University of Minnesota. The University of Central Florida has made every attempt to ensure the accuracy and reliability of the information provided in this list. However, the information is provided "as is" without warranty of any kind. UCF DOES not guarantee the completeness of the information contained herein.

30. Proven Honor Capital Limited
31. PT Huawei Tech Investment
32. Shanghai Huawei Technologies Co., Ltd.
33. TD Tech
34. Tianwen Digital Media Technology (Beijing) Co., Ltd.
35. Toga Networks Ltd

ZTE Corporation

(Sources: business databases, Wikipedia, ZTE Corporation 2017 Annual Report)

1. Anhui Wantong Information Systems Integration Company, Limited
2. Bestel Communications Ltd.
3. CASIC Shenzhen (Group) Company, Limited
4. Chengdu Zhongxing Software Company, Limited
5. Chengdu ZTE Software Company Limited
6. Enablence Technologies Inc.
7. Guangdong New Pivot Technology & Service Company Limited
8. Hengyang ICT Real Estate Co., Ltd.
9. Huanggang Education Valley Investment Holdings Co., Ltd.
10. Intlive Technologies (Private) Ltd.
11. Jiaxing Xinghe Capital Management Company Limited
12. Kaznurtel LLC
13. Kron Telekomunikasyon Hizmetleri A.S.
14. Laxense, Inc.
15. Nanjing Piaoxun Network Technology Co., Ltd.
16. Nationz Technologies, Inc. New Idea Investment Pte. Ltd.
17. Ningbo Zhongxing Technology Co., Ltd. Yunxiang
18. Nubia Technology Ltd.
19. OOO ZTE Russia Co., Limited
20. Pengzhong Xingsheng
21. Pt ZTE Indonesia
22. Puxing Mobil Tech Company Ltd.
23. S.C. First Project SA
24. Shanghai Xingfei Science And Technology Company, Limited
25. Shanghai Zhongxing Communication Co., Ltd.
26. Shanghai Zhongxing Qunli Information Technology Ltd.
27. Shanghai Zhongxing Telecom Equipment Technology & Service Company Limited
28. Shanghai Zte Technologies Co., Ltd.
29. Shenzhen Capital Group Co., Ltd.

30. Shenzhen Changfei Investment Company Limited
31. Shenzhen Force Science And Technology Co., Ltd.
32. Shenzhen Smart Electronics Ltd.
33. Shenzhen Weigao Semi-Conductor Technology Co., Ltd.
34. Shenzhen Zhongxing Hetai Hotel Investment and Management Co., Ltd.
35. Shenzhen Zhongxing ICT Company Limited
36. Shenzhen Zhongxing Microelectronic Technology Company Limited
37. Shenzhen Zhongxing Software Co., Ltd.
38. Shenzhen Zhongxing Telecom Technology & Services Co., Ltd.
39. Shenzhen Zhongxing Xinyu FPC Company Limited
40. Shenzhen ZTE Kangxun Telecom Co., Ltd.
41. Shenzhen ZTE Hetai Hotel Investment Management Ltd.
42. Sizhuo Zhongxing Hangzhou Technology Ltd.
43. Telecom Innovations
44. Wuxi Kaier Technology Co., Ltd.
45. Wuxi Taclink Optoelectronics Technology
46. Wuxi Zhongxing Optoelectronics Technologies Company Limited
47. Xi'an Zhongxing New Software Company Limited
48. Xian Zte Jingcheng Communication Company, Limited
49. Xingtian Communication Technology Tianjin Co., Ltd.
50. Yangzhou Zhongxing Mobile Telecom Equipment Co. Ltd.
51. Zhongxing Software Company Limited
52. Zhuhai Guangtong Automobile Co., Ltd
53. ZTE 9 (Wuxi) Co., Ltd.
54. Zte (Australia) Pty Ltd.
55. Zte Canada Inc.
56. ZTE Cooperatief U.A.
57. ZTE Corporation South Africa (PTY) Limited
58. Zte Czech, S.R.O.
59. ZTE Do Brasil Ltda.
60. ZTE Energy Co., Ltd.
61. ZTE Energy (Tianjin) Company Limited
62. ZTE France SASU
63. ZTE Ghana Limited
64. Zte Group
65. ZTE Group Finance Co., Ltd.
66. ZTE (Hangzhou) Company Limited
67. ZTE (Hong Kong) Ltd.
68. Zte Hrvatska D.O.O.
69. ZTE India R&D Center Private Limited

70. ZTE International Investment Co., Ltd.
71. ZTE Italy, S.r.l. ZTE Kangxun Telecom Company Limited
72. ZTE Malaysia Corporation SDN. BHD.
73. ZTE Mauritius Ltd.
74. ZTE Microelectronics Technology Co., Ltd.
75. ZTE Mobile Tech Company Limited
76. ZTE Netherlands B.V.
77. Zte Nigeria Investment LTD.
78. Zte Norway As
79. Zte Portugal Projectos De Telecomunicacoes, Unipessoal, Lda
80. Zte Romania Srl
81. ZTE Service Deutschland GmbH
82. Zte Singapore Pte. Ltd.
83. ZTE Software Technology (Nanchang) Co.
84. ZTEsoft Technology Company Limited
85. ZTE Supply Chain Co., Ltd
86. ZTE Sweden Ab
87. ZTE Technology & Service Company Limited
88. ZTE Telecom India Private Limited Company Limited
89. ZTE (Thailand) CO., Ltd
90. ZTE Ukraine LLC
91. ZTE (USA) Inc.