



Date: November 29, 2021
To: All Campus Personnel Responsible for Procurement Requests Including P-Card Holders
From: Rolando Mosqueda, AVP Procurement and Auxiliary Services
Subject: Compliance with NDAA Section 889 and FAR 52-204-25

Purpose

This memo provides guidance regarding the federal government's implementation of Section 889 of the National Defense Authorization Act (NDAA). The US federal government has issued rules and guidance that implement Section 889 of the National Defense Authorization Act (NDAA). This memo provides guidance to employees regarding the requirements that must be followed to ensure compliance.

Background

The National Defense Authorization Act (NDAA) section 889, and the Federal Acquisition Regulations (FAR) clause 52-204-25 provide restrictions on covered telecommunications equipment and services in government contracting.

The government seeks to avoid disruption of federal contractor systems, which could in turn, disrupt the operations of the federal government, as it relies on contractors to provide a range of support and services. The government seeks to avoid exfiltration of sensitive data from contractor systems arising from contractors' use of covered telecommunications equipment or services as a substantial or essential component or critical technology of any system. Such covered telecommunications equipment or services are thought to present privacy and security risks.

Government contractors and subcontractors, including universities, colleges, and research institutions are prohibited from buying or using equipment made by (1) Huawei Technologies Company, ZTE Corporation, Hytera Communications Corporation, Hangzhou Hikvision Digital Technology Company, or Dahua Technology Company or any subsidiary or affiliate of those entities or (2) any entity owned or controlled by or connected to the government of the People's Republic of China (PRC).

Compliance Requirements for all employees:

- Employees with purchasing authority (regardless of the dollar level) must not request or buy equipment or services produced by the entities listed above.



ASSOCIATE VICE PRESIDENT PROCUREMENT AND AUXILIARY SERVICES

6375 W. CHARLESTON BLVD
LAS VEGAS, NV 89146
PHONE (702) 651-5514 – FAX (702) 651-7383

- Employees must not accept gifts or transfer equipment to the institution without reviewing the acquisition source to ensure compliance with this rule.
- All equipment and use of outside telecommunication services must be reported to Purchasing and IT for vetting.

Report concerns with these requirements to purchasing2@csn.edu.