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May 6, 2025

The Honorable Pete Hegseth Secretary of Defense U.S. Department of Defense 1000 Defense Pentagon Washington, DC 20301 The Honorable Howard Lutnick Secretary of Commerce U.S. Department of Commerce 1401 Constitution Ave NW Washington, DC 20230

The Honorable Brendan Carr Chairman Federal Communications Commission 45 L Street NE Washington, DC 20554

Dear Secretary Hegseth, Secretary Lutnick, and Chairman Carr:

We are writing to urge you to examine risks associated with robotics manufacturers from the People's Republic of China (PRC) that pose a growing national security threat through direct support to the People's Liberation Army (PLA). An illustrative concern is Unitree¹, a company with well-documented ties to PLA-affiliated institutions and Chinese Communist Party (CCP) entities. Reporting indicates that Unitree has participated in military-civil fusion programs, received PRC state funding, contributed to defense research, and produces robotic systems with clear military utility—including autonomous mobility, surveillance, and payload capabilities. We respectfully request that the Department of Defense, Department of Commerce, and Federal Communications Commission investigate Unitree's role in advancing PRC military objectives and based on those findings, consider designating it under Section 1260H of the Fiscal Year 2021 National Defense Authorization Act (FY21 NDAA), adding it to the Entity List, and including it on the Covered List.

The PRC's strategic push into AI and robotics is explicitly tied to the PLA. National initiatives such as Made in China 2025 and the Robotics+ Action Plan prioritize dual-use technology, automation, and intelligent systems to support military modernization.² Unitree

¹ Also known as: Unitree Robotics, 宇树科技有限公司, 宇树科技, Hangzhou YuShu Technology Co., Ltd.

² Made in China 2025: Promoting Robotics Development, STATE COUNCIL (2016), available at https://archive.ph/TWqyH#selection-325.9-325.30; Outline of the 14th Five-Year Plan for National Economic and Social Development and Long-Range Objectives Through the Year 2035, STATE COUNCIL (2021), available at https://web.archive.org/web/20250314190524/https://www.gov.cn/xinwen/2021-

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appears to exemplify how this strategy is executed—bridging civilian and military tech pipelines.³ Unitree's CEO Xingxing Wang appeared in a February 2025 closed-door CCP meeting with General Secretary Xi Jinping, seated in a top-ranking position.⁴ The firm is heavily subsidized as one of Hangzhou's "six little dragons," while also being backed by the city's \$140 billion Sci-Tech Fund and benefiting from its rapidly growing \$21 billion robotics sector.⁶ It operates from the Hangzhou High-Tech Zone—a designated military-civil fusion hub—and has received multiple rounds of government support, including critical emergency funding that "br[ought] it back to life" when facing collapse. 8 According to the PRC's National University of Defense Technology, Unitree is central to the PRC's AI expansion alongside Huawei and SMIC, strategically positioned to integrate its technology across government, telecommunications, and military infrastructure.⁹

Unitree's sales in the PRC confirm its defense relevance. The company has sold robots to Beihang University¹⁰ and North University¹¹ of China, both known for missile, aerospace, and weapons research. 12 It has also supplied platforms to PRC police for monitoring and surveillance activities. 13 In 2024, a Unitree robot equipped with a rifle was featured in PLA-Cambodian joint

^{03/13/}content 5592681.htm; Robot+ Application Action Plan, MINISTRY OF INDUS. & INFO. TECH. (2023), available at https://web.archive.org/web/20250314210258/https://www.gov.cn/zhengce/zhengceku/2023-01/19/content_5738112.htm; 14th Five-Year Plan for Intelligent Manufacturing Development, STATE COUNCIL (2021), available at

https://web.archive.org/web/20250314210417/https://www.gov.cn/zhengce/zhengceku/2021-12/28/content_5664996.htm.

³ Sunny Cheung, Testimony Before the U.S.-China Economic and Security Review Commission's Hearing "Made in China 2025—Who Is Winning?", U.S.-CHINA ECON. & SEC. REVIEW COMM'N (Feb. 6, 2025), available at https://www.uscc.gov/sites/default/files/2025-02/Sunny Cheung Testimony.pdf.

⁴ Zhou Xin & Leopold Chen, What did China's tech entrepreneurs tell Xi Jinping at the symposium?, SOUTH CHINA MORN. POST (Feb. 21, 2025), available at https://www.scmp.com/tech/big-tech/article/3299599/what-did-chinas-tech-entrepreneurs-tell-xi-jinpingsymposium?utm_source=cm&utm_medium=txn&utm_campaign=enlz-NOT-Follow&utm_content=20250222_daily5&d=c82ad889-ffec-4fc8-

⁵ The "six little dragons of Hangzhou" refers to a group of state-backed tech companies—DeepSeek, Game Science, Unitree, Manycore Tech, Brain Co., and DEEP Robotics—designated by Hangzhou in January 2025 as priority recipients for targeted government funding and policy support, with the city allocating 15.72% of its industrial policy funds specifically to foster these types of enterprises. See "Hangzhou's Six Little Dragons" Spark the 'Mysterious Eastern Force', HANGZHOU MUN. INV. PROMOTION BUREAU (Jan. 16, 2025), available at https://web.archive.org/web/20250314192706/http://tzcj.hangzhou.gov.cn/art/2025/1/16/art 1621408 58894355.html; Xu Yiping, "After the 'Six Little Dragons' Went Viral: What Are Other Places Learning from Hangzhou and What Is Hangzhou Doing?", THE PAPER (Feb. 12, 2025), available at https://web.archive.org/web/20250402191946/https://www.thepaper.cn/newsDetail_forward_30137040; Why Hangzhou Was Able to Give Birth to the "Six Little Dragons", CHINA NEWS NETWORK (Feb. 10, 2025), available at https://web.archive.org/web/20250316235335/https://news.cnr.cn/native/gd/20250210/t20250210_527067314.shtml; "Digital Hangzhou"

Technology Leadership Drives Momentum, CCTV (Feb. 17, 2025), available at https://web.archive.org/web/20250317024907/http://www.81.cn/zt/2025nzt/njtdgzlfzhlpxzgsxdhxpzjj2025nqglh/lhrddc/16369966.html.

⁷ Organization Structure and Main Responsibilities, HANGZHOU HIGH-TECH. INDUS. DEV. ZONE (BINJIANG) DEV. & REFORM BUREAU (last visited Mar. 16, 2025), available at https://web.archive.org/web/20250317015401/https://www.hhtz.gov.cn/col/col1229241840/index.html; Information Index No. 002493486/2024-21145, HANGZHOU HIGH-TECH. INDUS. DEV. ZONE (BINJIANG) DEV. & REFORM BUREAU (July 2, 2024), available at https://web.archive.org/web/20250317015908/https://www.hhtz.gov.cn/art/2024/7/2/art 1229241843 171518.html.

⁹ Wang Yongchang, Seizing New Opportunities in Intelligent Development and Accelerating School Construction, NAT'L UNIV. OF DEF. TECH. (Feb. 26, 2025), available at

https://web.archive.org/web/20250227224044/https://www.nudt.edu.cn/xwgg/kdyw/0faf952e2e47454287230aba9ef5c37c.htm.

¹⁰ Beihang University School of Mechanical Engineering and Automation Force Feedback Glove Procurement Bidding Results Announcement, Bidlink (Aug. 4, 2021), available at https://www.ebnew.com/businessShow/668892753.html (https://archive.vn/11n8C).

¹¹ Ordnance Science and Technology - First-Class Discipline Construction Project Results Announcement, BID LINK (Dec. 12, 2022), available at https://www.ebnew.com/businessShow/682062514.html (https://archive.vn/f4I5O).

¹² Beihang University, The China Defense Universities Tracker, AUSTL. STRATEGIC POLICY INST. (Nov. 17, 2019), available at https://unitracker.aspi.org.au/universities/beihang-university/; North University, The China Defense Universities Tracker, AUSTL. STRATEGIC POLICY INST. (Nov. 17, 2019), available at https://unitracker.aspi.org.au/universities/north-university-of-china/.

¹³ Tianjin Public Security Bureau Special Police Corps Special Police Quadruped Robot Procurement Project (Project Number: CJKJ-2021-01045) Transaction Announcement, BID LINK (Jun. 17, 2021) available at https://www.ebnew.com/businessShow/667412427.html (https://archive.vn/sdkQc); Tianjin Public Security Bureau Special Police Corps Special Police Quadruped Robot Procurement Project Package 1 (Project Number: CJKJ-2021-01045) Contract Announcement, BID LINK (Jun. 18, 2021), available at

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military exercises, with PLA officers confirming its intended role in combat operations.¹⁴ Separately, Unitree's B2 platform has been upgraded with military-grade thermal imaging, 240kg payload capacity, and rugged mobility for complex battlefield use.¹⁵ Its resemblance to the PLA's "Machine Wolf"—developed by China South Industries Group and Chongqing Jianshe Industry—has fueled speculation of technology sharing.¹⁶ Unitree and Jianshe signed a formal partnership in 2025, linking the firm to PRC's military supply chain.¹⁷



Source: Orange News¹⁸

Perhaps the most urgent risk to these platforms is remote digital access. In March 2025, cybersecurity researchers reported that Unitree robots come pre-installed with an undocumented remote access tunnel called CloudSail. This service is enabled by default and silently connects each robot to Unitree's servers in the PRC. It appears that anyone with access to the API key can tunnel into a robot, stream video, or access systems via SSH—using default credentials. Researchers identified 1,900 connected robots with no disclosure to end users and no authentication barriers. As the authors of this report put it, while "[t]he use of such tunnel

https://www.ebnew.com/businessShow/667576915.html (https://archive.vn/5HZsV); Perkin Amalaraj, Chinese cops show off robot officer and dog at F1 Grand Prix, MSN (Mar. 23, 2025), available at https://www.msn.com/en-ie/money/technology/chinese-cops-show-off-robot-officer-and-dog-at-f1-grand-prix/ar-AA1Bucsa.

¹⁴ *Id.*, Alex Hern, Meet the Chinese army's latest weapon: the gun-toting dog, THE GUARDIAN (May 30, 2024), *available at* https://www.theguardian.com/science/article/2024/may/30/chinese-armys-latest-weapon-gun-toting-dog.

¹⁵ Unaging Captain, In-Depth Analysis: Unitree Robotics, A Pioneer in the Field of Robotics, TOUTIAO (Jan. 23, 2025), available at https://m.toutiao.com/article/7463008819522634290/?upstream biz=toutiao pc (https://archive.ph/S3n2c).

¹⁶ China's military robo-wolves unveiled at Airshow China 2024, possessing high mobility and adaptability in complex terrains, GLOBAL TIMES (Nov. 11, 2024), available at https://web.archive.org/web/20250318020315/https://www.globaltimes.cn/page/202411/1322840.shtml; From Robot Dogs to Robot Wolves: Which of These Many Models Do You Care About Most?, Weixin (Jan. 13, 2025), available at https://web.archive.org/web/20250318014748/https://mp.weixin.qq.com/s?src=11×tamp=1742261818&ver=5875&signature=DYuFLZg6fv sPla1fnde9hl9k2hHpiZ9K-

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17 Unitree Technology Officially Announces Signing Four Core Enterprises! (List Attached), Weixin (Feb. 9, 2025), available at

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kDbTyHd6xP%2A9FckNjYNY2dPEDye8fC4AZKkbSnAGfylC1n1flFpeqAJ9PLUH65WhQU4%2AcyAqMzuKsXoM2cExzQgqsz51oS2pPZ8I
vz-r3IS-QWw6Bcpy0&new=1; Four-Legged Robot "Robo-Wolf": Speculation on Cooperation Between Construction Industry and Unitree
Technology!, Sohu (Feb. 24, 2025), available at

 $https://emcreative.eastmoney.com/app_fortune/article/index.html?artCode=20250221115306813423410\&postId=1519495664~(https://archive.vn/xDvzS).$

¹⁸ Tan Yi, Zhuhai Airshow 2024 | "Machine Wolf" Team Demonstrates Dynamic Capabilities for the First Time, Effectively Supporting Soldiers in Complex Terrain, Orange News (2024), available at

https://web.archive.org/web/20250324230702/https://www.orangenews.hk/china/1244750/%E6%95%99%E8%82%B2%E9%83%A8%E6%96%B0%E6%B3%95%E8%A6%8F%E5%AE%9A%E5%B9%BC%E5%85%92%E5%9C%92%E4%BA%BA%E5%93%A1%E9%85%8D%E5%82%99%E6%BA%96%E5%89%87-

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¹⁹ Andreas Makris & Kevin Finisterre, Unitree Go1 – Who Is Speaking to My Dog? (Think-Awesome Mar. 21, 2025), available at https://think-awesome.com/download_unitree_report.

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services do have a wide aspect of legitimate use-cases, the concerning thing is running such a service without user-knowledge. In this case, as this service is installed and operated without user consent, we clearly need to label it [a] backdoor."²⁰

Unitree's privacy policy confirms that user data is stored in the PRC²¹ and thus subject to PRC intelligence and cybersecurity laws, which compel compliance with state security demands.²² The company also uses iFlytek—sanctioned by the U.S. Government for mass surveillance²³—to process voice data.²⁴ Separate academic research has shown Unitree robots can be hacked to override safety systems and conduct covert surveillance.²⁵

PLA-connected Unitree robots now operate within sensitive American institutions. With direct ties to Beijing's defense apparatus, these systems have been utilized by law enforcement agencies, correctional facilities, and defense installations²⁶ across the country.²⁷ One commercial vendor alone plans to deploy 100 units in a state prison system, ultimately targeting 1,000 installations. Further compounding this risk, Federal Communications Commission equipment authorizations allow these devices to connect to U.S. telecommunications networks, ²⁸ potentially exposing critical infrastructure to remote surveillance and data collection by PLA-affiliated technology.

Your agencies have the authority to address this threat. We urge immediate investigation and, as appropriate, corresponding designations to prevent further utilization of PLA-linked technology in critical U.S. infrastructure and security systems.

Thank you for your attention to this important matter.

²¹ Unitree Technology Privacy Policy, Unitree, available at

https://web.archive.org/web/20250316133511/https://marketing.unitree.com/go2En/docPrivacy.html.

²² National Intelligence Law of the PRC (Standing Comm. Nat'l People's Cong., June 27, 2017, effective June 28, 2017), art. 7; Cybersecurity Law of the P.R.C. (Standing Comm. Nat'l People's Cong., Nov. 7, 2016, effective June 1, 2017), art. 28; National Security Law of the P.R.C. (Standing Comm. Nat'l People's Cong., July 1, 2015, effective July 1, 2015), art. 11.

23 Addition of Certain Entities to the Entity List, 84 Fed. Reg. 54,502, 54,503 (Oct. 10, 2019) (codified at 15 C.F.R. pt. 744).

²⁴ Unitree Technology Privacy Policy, Unitree, available at

https://web.archive.org/web/20250316133511/https://marketing.unitree.com/go2En/docPrivacv.html.

²⁵ Alexander Robey et al., Jailbreaking LLM-Controlled Robots, arXiv preprint (2024), available at https://robopair.org/files/research/robopair.pdf.

²⁶ Dep't of the Army, Waiver Determination for Two (2) Unitree Robotics Go1 EDU Quadrupedal Robots, Procurement Instrument Identifier (PIID) W911QX-23-Q-0215 (Sept. 12, 2023), available at

https://www.madeinamerica.gov/waivers/nonavailability/64fa58a21734bedbb83b9663; Dep't of the Army, Waiver Determination for Unitree GO2 EDU U1 with Accessories, Procurement Instrument Identifier (PIID) N/A (Sept. 18, 2024), available at https://www.madeinamerica.gov/waivers/nonavailability/66e1ac691fb41266afd8ff4d.

²⁷ For examples of American firms reselling Unitree robots, see Thermonator, Xmatter LLC, available at

https://web.archive.org/web/20250325012143/https://throwflame.com/products/thermonator-robodog/; Max Hauptman, This flame-throwing robot dog is the stuff of nightmares, Task & Purpose (Jun. 23, 2023), available at

https://web.archive.org/web/20250325012545/https://taskandpurpose.com/tech-tactics/robot-dog-flamethrower-thermonator/; Drones Plus and Unitree Forge Exclusive Partnership to Distribute Robotic Solutions Across North America, EIN Presswire (Oct. 25, 2023), available at https://web.archive.org/web/20250316170318/https://fox5sandiego.com/business/press-releases/ein-presswire/663875690/drones-plus-andunitree-forge-exclusive-partnership-to-distribute-robotic-solutions-across-north-america/; Unitree Platforms, Drones Plus Robotics, available at https://web.archive.org/web/20250316170217/https://www.dronesplusrobotics.com/pps/unitree/platforms; About Us, Drones Plus Robotics, available at https://web.archive.org/web/20250316170419/https://www.dronesplusrobotics.com/about-drones-plus-robotics; Homepage, Stokes Robotics, available at https://web.archive.org/web/20250316222238/https://stokesrobotics.com/.

²⁸ Hangzhou YuShu Technology Co., Ltd., Equipment Authorization for Quadruped Robot, FCC Identifier 2A5PE-YUSHU006 (granted Oct. 16, 2023), available at https://fcc.report/FCC-ID/2A5PE-YUSHU006; Hangzhou YuShu Technology Co., Ltd., Equipment Authorization for Remote Control, FCC Identifier 2A5PE-YUSHU007 (granted Nov. 18, 2023), available at https://fcc.report/FCC-ID/2A5PE-YUSHU007.

Sincerely,

John Moolenaar Chairman

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