



OFFICE OF THE UNDER SECRETARY OF DEFENSE

3000 DEFENSE PENTAGON
WASHINGTON, DC 20301-3000

ACQUISITION
AND SUSTAINMENT

MEMORANDUM FOR COMMANDER, UNITED STATES CYBER
COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES SPECIAL OPERATIONS
COMMAND (ATTN: ACQUISITION EXECUTIVE)
COMMANDER, UNITED STATES TRANSPORTATION
COMMAND (ATTN: ACQUISITION EXECUTIVE)
DEPUTY ASSISTANT SECRETARY OF THE ARMY
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE NAVY
(PROCUREMENT)
DEPUTY ASSISTANT SECRETARY OF THE AIR FORCE
(CONTRACTING)
DEFENSE AGENCY AND DOD FIELD ACTIVITY DIRECTORS

SUBJECT: Updated Unmanned Aircraft System Governmentwide Commercial Purchase Card
Prohibited Purchase Limited Exception to Policy Requirements (GPC 2025-01)

- References:
- (1) Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs, October 1, 2024, Paragraph A.1.2.4 Prohibited Purchases (bb)
 - (2) Defense Pricing and Contracting (DPC) Memorandum, "Limited Exception to the General Governmentwide Commercial Purchase Card Unmanned Aerial System Purchasing Prohibition," March 1, 2019
 - (3) Federal Acquisition Regulation (FAR) subpart 40.2, Security Prohibitions and Exclusions and FAR 13.201(m)
 - (4) Joint Office of the Under Secretary of Defense for Acquisition & Sustainment (OUSD(A&S)) and DoD Office of the Chief Information Officer Memorandum, "REVISION 1: Procedures for the Operation or Procurement of Unmanned Aircraft Systems to Implement Section 848 of the National Defense Authorization Act for Fiscal Year 2020," December 22, 2021
 - (5) Deputy Secretary of Defense Memorandum, "Guidance for Procedures for the Operation and Procurement of Unmanned Aircraft Systems to Implement Section 848 of the National Defense Authorization Act for Fiscal Year 2020," September 8, 2021
 - (6) Class Deviation 2024-O0014, "Prohibition on Procurement of Foreign-Made Unmanned Aircraft Systems," August 28, 2024
 - (7) OUSD(A&S) Memorandum, "Exception to Policy Requirement for Blue Small Unmanned Aircraft System," October 13, 2022

This memorandum updates Department of Defense (DoD) Unmanned Aircraft System (UAS) Governmentwide Commercial Purchase Card (GPC) prohibited purchase limited exception to policy (ETP) requirements.

Reference 1 prohibits use of the GPC to purchase UAS. Reference 2 authorizes a limited ETP permitting GPC use after DoD UAS operation and procurement approval requirements are fulfilled and written GPC pre-purchase approval is obtained.

Effective immediately, the following supersede the Reference 2 ETP requirements:

1. The GPC shall not be used to purchase Federal Acquisition Security Council (FASC)-prohibited UAS. Reference 3 definitions apply. Additional resources are listed in Attachment 1.
 - a. Purchase requests for FASC-prohibited UAS, including those approved for operation and procurement in accordance with References 4 and 5 and/or any subsequent issuances applicable to DoD, shall be sent to the supporting contracting office for action.
 - b. Contracting offices shall procure all UAS in compliance with applicable regulations, including References 3 and 6.
2. The GPC shall be used to fulfill only UAS requirements that—
 - a. Are available on the Defense Innovation Unit “Blue UAS Cleared List” (<https://www.diu.mil/blue-uas-cleared-list>) when the requirements of Reference 7 are met; or
 - b. Have been approved for operation and procurement in accordance with References 4 and 5 and/or any subsequent issuances applicable to DoD.
3. The applicable Attachment 2 or 3 form, based on effective date, shall be completed prior to using the GPC to fulfill all UAS requirements. The Cardholder shall retain the completed form with the transaction supporting data. Electronic versions of both forms are maintained on the Defense Pricing, Contracting, and Acquisition Policy (DPCAP) GPC website at <https://www.acq.osd.mil/asda/dpc/ce/pc/docs-guides.html>.

Effective December 22, 2025, the Reference 1 prohibition will expand to also include the prohibitions at FAR 40.203-3 (b) and (c) which currently include procuring services for the operation of a FASC-prohibited UAS and using Federal funds for the procurement or operation of a FASC-prohibited UAS.

Direct questions related to GPC use to my action officer, Ms. Denise Reich, denise.a.reich.civ@mail.mil. Direct questions related to UAS operation and procurement policy to Mr. James Taylor, OUSD(A&S) / Acquisition / Platform and Weapon Portfolio Management, james.r.taylor11.civ@mail.mil. Links to additional resources are found on Attachment 1.

John M. Tenaglia
Principal Director
Defense Pricing, Contracting, and
Acquisition Policy

Attachments:
As stated

Additional Resources

1. Interim rule for FAR Case 2024-002, “Prohibition on Unmanned Aircraft Systems from Covered Foreign Entities,” November 12, 2024, available at:
<https://www.federalregister.gov/documents/2024/11/12/2024-26061/federal-acquisition-regulation-prohibition-on-unmanned-aircraft-systems-from-covered-foreign>
2. 49 United States Code 44801: Definitions, available at:
<https://uscode.house.gov/view.xhtml?path=/prelim@title49/subtitle7/partA/subpart3/chapter448&edition=prelim>
3. Section 848 of the National Defense Authorization Act (NDAA) for Fiscal Year 2020 (Public Law 116-92), available at:
<https://www.congress.gov/bill/116th-congress/senate-bill/1790>
4. Section 817 of the NDAA for FY 2023 (Public Law 117-263), available at:
<https://www.congress.gov/bill/117th-congress/house-bill/7776/text>
5. Request Common Access Card (CAC)-enabled access to DoD UAS procurement and operation policy at:
https://intelshare.intelink.gov/sites/DoDJRASE/_layouts/15/start.aspx#/DODOSD%20Publications%20and%20Documents/Forms/AllItems.aspx?RootFolder=%2Fsites%2FDoDJRASE%2FDODOSD%20Publications%20and%20Documents%2FUncrewed%20Aerial%20Systems%20%28UAS%29%20Policies%20and%20Directives&FolderCTID=0x012000557BAC465580254E8A6CE8E91F7A54BD&View=%7B3B65989E%2D0DC4%2D434D%2DAA30%2DDA734EE0041F%7D
6. DPCAP GPC Frequently Asked Questions (FAQs) are available at:
<https://www.acq.osd.mil/asda/dpc/ce/pc/faq.html>

Pre-Purchase Exception to Policy Approval Form
Applicable through December 21, 2025

References:

- (1) Office of the Under Secretary of Defense (OUSD) (Acquisition and Sustainment) (A&S) Memorandum, "Exception to Policy Requirement for Blue Small Unmanned Aircraft System," October 13, 2022
- (2) Joint OUSD(A&S) and Department of Defense (DoD) Chief Information Officer Memorandum, "REVISION 1: Procedures for the Operation or Procurement of Unmanned Aircraft Systems to Implement Section 848 of the National Defense Authorization Act for Fiscal Year 2020," December 22, 2021
- (3) Deputy Secretary of Defense Memorandum, "Guidance for Procedures for the Operation and Procurement of Unmanned Aircraft Systems to Implement Section 848 of the National Defense Authorization Act for Fiscal Year 2020," September 8, 2021
- (4) Federal Acquisition Regulation (FAR) subpart 40.2, Security Prohibitions and Exclusions and FAR 13.201(m)
- (5) Class Deviation 2024-O0014, "Prohibition on Procurement of Foreign-Made Unmanned Aircraft Systems," August 28, 2024
- (6) Defense Pricing, Contracting, and Acquisition Policy Memo, "Updated Unmanned Aircraft System Governmentwide Commercial Purchase Card Prohibited Purchase Limited Exception to Policy Requirements (GPC 2025-01),"
- (7) Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs, October 1, 2024, Paragraph A.1.2.4 Prohibited Purchases (bb)

Requiring Office checks the statements that apply and signs and dates below:

Number	Mandatory Requiring Office Statement
<input type="checkbox"/> A	<ul style="list-style-type: none"> • This Unmanned Aircraft System (UAS) requirement is for an item on the Defense Innovation Unit "Blue UAS Cleared List" (https://www.diu.mil/blue-uas-cleared-list); and • The UAS will be operated only as specified in Reference 1.
<input type="checkbox"/> B	<ul style="list-style-type: none"> • The procedures specified in References 2 and 3, and any subsequent policy issuances applicable to DoD, have been followed to approve operation and procurement of this UAS requirement; and • This UAS requirement is not for a Federal Acquisition Security Council (FASC)-prohibited UAS as defined in Reference 5. <p style="text-align: center;"><i>Use of the Governmentwide Commercial Purchase Card (GPC) to purchase FASC-prohibited UAS is strictly prohibited. See FAR subpart 40.2 and 13.201(m).</i></p>
<input type="checkbox"/> C	<ul style="list-style-type: none"> • This UAS requirement does not meet the criteria in A or B above.

Requiring Office Official Signature

Printed Name

Date

Cardholder's Approving/Billing Official checks the statement that applies and signs and dates below:

Based on the above Requiring Office confirmation that this UAS requirement meets the criteria in A and/or B above, I affirm a limited exception to policy authorized in Reference 5 applies; therefore, the GPC may be used to fulfill this UAS requirement which would otherwise be prohibited by Reference 6.

The UAS requirement must be sent to the supporting contracting office for action because the Requiring Office selected C above. GPC use for this UAS requirement is prohibited in accordance with Reference 4 and FAR 13.201(m).

Approving/Billing Official Signature

Printed Name

Date

DoD GPC policy prohibits loading documents marked as CUI or higher to the card issuing bank's electronic access system (e.g., Access® Online). Supporting documentation with these markings shall be handled in accordance with applicable Component security requirements and be available off-line for purposes of GPC account inspections and audits.

Pre-Purchase Exception to Policy Approval Form
Applicable on or after December 22, 2025

References:

- (1) Office of the Under Secretary of Defense (OUSD) Acquisition and Sustainment (A&S) Memorandum, "Exception to Policy Requirement for Blue Small Unmanned Aircraft System," October 13, 2022
- (2) Joint OUSD(A&S) and Department of Defense (DoD) Chief Information Officer Memorandum, "REVISION 1: Procedures for the Operation or Procurement of Unmanned Aircraft Systems to Implement Section 848 of the National Defense Authorization Act for Fiscal Year 2020," December 22, 2021
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- (7) Department of Defense Government Charge Card Guidebook for Establishing and Managing Purchase, Travel, and Fuel Card Programs, October 1, 2024, Paragraph A.1.2.4 Prohibited Purchases (bb)

Requiring Office checks the statements that apply and signs and dates below:

Number	Mandatory Requiring Office Statement
<input type="checkbox"/> A	<ul style="list-style-type: none"> • This Unmanned Aircraft System (UAS) requirement is for an item on Defense Innovation Unit "Blue UAS Cleared List" (https://www.diu.mil/blue-uas-cleared-list); and • The UAS will be operated only as specified in Reference 1.
<input type="checkbox"/> B	<ul style="list-style-type: none"> • The procedures specified in References 2 and 3, and any subsequent policy issuances applicable to DoD, have been followed to approve operation and procurement of this UAS requirement; and • This UAS requirement does not require the procurement of services for the operation of a Federal Acquisition Security Council (FASC)-prohibited UAS as defined in Reference 5, and • This UAS requirement does not require use of federal funds for the procurement or operation of a FASC-prohibited UAS as defined in Reference 5. <p style="text-align: center;"><i>Effective 12/22/25, use of the Governmentwide Commercial Purchase Card (GPC) as described above is strictly prohibited. See FAR subpart 40.2 and 13.201(m).</i></p>
<input type="checkbox"/> C	<ul style="list-style-type: none"> • This UAS requirement does not meet the criteria in A or B above.

 Requiring Office Official Signature

 Printed Name

 Date
Cardholder's Approving/Billing Official checks the statement that applies and signs and dates below:

Based on the above Requiring Office confirmation that this UAS requirement meets the criteria in A and/or B above, I affirm a limited exception to policy authorized in Reference 5 applies; therefore, the GPC may be used to fulfill this UAS requirement which would otherwise be prohibited by Reference 6.

The UAS requirement must be sent to the supporting contracting office for action because the Requiring Office selected C above. GPC use for this UAS requirement is prohibited in accordance with Reference 4 and FAR 13.201(m).

 Approving/Billing Official Signature

 Printed Name

 Date

DoD GPC policy prohibits loading documents marked as CUI or higher to the card issuing bank's electronic access system (e.g., Access[®] Online). Supporting documentation with these markings shall be handled in accordance with applicable Component security requirements and be available off-line for purposes of GPC account inspections and audits.