China's Wingmen

How Western Government Policy Enabled China's Rise in the Skies

THE SELECT COMMITTEE ON THE STRATEGIC COMPETITION BETWEEN THE UNITED STATES AND THE CHINESE COMMUNIST PARTY

Table of Contents

Introduction ..... - 3 -

Background: China's Aerospace Sector ..... - 7 -

Part I: Technology Transfer & Indigenous Capabilities Through Commercial Partnerships ..... - 10 -

Part II. When Safeguards Fail ..... - 27 -

Part III. The Backfill Problem ..... - 32 -

Airbus ..... - 34 -

Dassault Systèmes International ..... - 37 -

Safran ..... - 38 -

Part IV. Policy Solutions ..... - 40 -

Policy Recommendation 1: Force Defense Contractors to Pick a Side ..... - 40 -

Policy Recommendation 2: Restrict Investments in China's Aerospace Sector, and Expect Allies and Partners to Do the Same ..... - 40 -

Policy Recommendation 3: The Federal Aviation Administration Should Not Certify Aircraft Manufactured in China ..... - 41 -

Policy Recommendation 4: Require Defense and Aerospace Contractors to Disclose Ties to Chinese Military-Designated Entities ..... - 41 -

Policy Recommendation 5: Toughen Export Control Licensing and Enforcement for Aerospace Technology Exports to China - 41 -

Policy Recommendation 6: Direct the Intelligence Community to Assess the National Security Threat Posed by Commercial Geospatial AI Tools ..... - 42 -

Policy Recommendation 7: Subject Acquisition of American Aerospace Companies by French Companies to Heightened Scrutiny and a Presumption of Denial Until They Unwind Ties to China's Civil-Military Ecosystem ..... - 42 -

Attachment A – Airbus Letter ..... - 57 -

INTRODUCTION

On March 7, 1996, U.S. Defense Secretary William J. Perry delivered a blunt threat: to go to war.[1] As the Third Taiwan Strait Crisis intensified, U.S. Air Force RC-135 reconnaissance aircraft and the cruiser USS *Bunker Hill* monitored three PRC M-9 ballistic missiles launched toward waters near Taiwan, splashing down near shipping lanes serving the island's principal ports.[2] Later that day, Secretary Perry met with a senior People's Republic of China ("PRC") national security official and warned that there would be "grave consequences" if Chinese weapons struck Taiwan.[3] The message was unmistakable: the United States was prepared to respond militarily. It was a potent threat in 1996 when America had air supremacy, but Beijing spent the next thirty years changing that—and ultimately succeeded. For the first time in a generation, American air power can be genuinely challenged by another nation, as China has fielded the advanced military aircraft that underwrote American deterrence in Secretary Perry's era.

The U.S. Department of War's ("DoW") own unclassified assessments show how quickly the U.S. air power advantage eroded. In 2005, the Pentagon described many Chinese aircraft within range of Taiwan as "obsolescent" or "upgrades of older-generation aircraft,"[4] and even in 2010 reported that the PLA Air Force ("PLAAF") still "encountered difficulty expanding its fleet of long-range heavy transport aircraft."[5] The trajectory then shifted sharply. After China unveiled its first stealth aircraft prototype in 2011,[6] the Pentagon described the PLAAF in 2012 as "transforming into a force capable of off-shore offensive and defensive operations" and, by 2015, as "rapidly closing the gap with western air forces across a broad spectrum of capabilities."[7] By 2020, DoW warned that the PLAAF was "rapidly catching[8] up to Western air forces" and eroding longstanding U.S. technical advantages in the air domain.[9] Four years later, the Pentagon assessed that the service was "rapidly approaching technology typical of U.S. standards."[10]

That rapid convergence raises a central question: **how did Beijing achieve in years what took established aerospace powers decades to build?** While prior government reports have documented indigenous efforts and illicit technology theft, this report examines a more subtle, overlooked pathway: legal commercial relationships.[11] Through joint ventures, co-development agreements, and other commercial relationships, American and other Western companies transferred technology, know-how, and industrial capacity to the PRC. Many transfers were licensed as commercial, and others required no license at all. However, in aerospace, the line between civil and military technology has become exceptionally thin. For example, the E-7 military Airborne Early Warning and Control aircraft uses the Boeing 737-700 commercial airframe.[12] The same materials, designs, and manufacturing capabilities that build an airliner are, in large part, those that build a military aircraft. As a result, technology transferred for ostensibly commercial purposes could simultaneously advance military development. That commercial engagement reflected the prevailing Western approach to the PRC. For decades, the United States and its allies encouraged

deeper economic ties with Beijing, believing that economic integration would promote political liberalization and reduce strategic tensions.[13] Western aerospace companies operated in that policy environment and pursued the opportunities created by the PRC's growing market. The Chinese Communist Party ("CCP"), meanwhile, promoted a narrative of a "peaceful rise" that reassured foreign partners that economic development could proceed separately from military competition.[14]

In reality, the CCP pursued a long-term effort to build "comprehensive national power" by integrating economic, technological, industrial, and military capabilities.[15] Central to that effort was the Military-Civil Fusion ("MCF") Development Strategy, which sought to break down barriers between civilian and defense sectors so technology, capital, talent, and other resources can seamlessly move between the two.[16] The result was a system in which foreign firms could believe they were supporting civilian growth even as commercial capabilities became available to the PLA. As shown in **Figure 1**, that overlap was direct, with PLA personnel loading military equipment onto a commercial Airbus aircraft during a military exercise.[17]

Figure 1. PLA Use of a Commercial Airbus Aircraft During Military Exercise



Chinese Military Hardware Being Loaded on an Airbus A320 Commercial Aircraft, 2011[18]



Chinese Military Forces Boarding an Airbus A320 Commercial Aircraft, 2011[19]

This policy aided Beijing's military aerospace ambitions. That historical miscalculation partially explains how these partnerships began, but it does not explain their continuation after Washington abandoned this notion and began restricting many of the same military-linked entities.[20] Deep ties to the PRC may carry one set of risks for companies in sectors such as consumer products, automobiles, or electronics. They carry very different risks for companies that develop military aircraft, missile systems, avionics, communications equipment, and other technologies central to U.S. national security.

Aerospace is especially vulnerable because many commercial aviation technologies are inherently dual-use. Avionics, cockpit displays, radar, structures, and precision manufacturing can support both civilian and military platforms.[21] The U.S. Navy's P-8 Poseidon maritime patrol and reconnaissance aircraft, for example, shares 86 percent parts commonality with Boeing's Next-Generation 737 commercial aircraft.[22] The issue is therefore not whether commercial aerospace

technology can contribute to military capability, but whose military ultimately benefits. The relationships examined in this report helped build aerospace capabilities inside China's military industrial base that could support PLA modernization.

Over the past year, the United States House Select Committee on Strategic Competition between the United States and the Chinese Communist Party ("Select Committee") investigated Western aerospace ties to the PRC's military industrial base through company records, public source research, interviews with market participants, and engagement with foreign governments. The Select Committee requested and reviewed information from General Electric ("GE") Aerospace, Honeywell Aerospace, and Collins Aerospace concerning their PRC operations and relationships with PRC defense entities such as the Aviation Industry Corporation of China ("AVIC") and the Commercial Aircraft Corporation of China ("COMAC").

On the surface it may seem as though all aerospace companies play by the same rules, but they do not. While American firms are subject to oversight from Congress and the executive branch, France enacted a law that actively obstructs American oversight. At the same time, French aerospace companies sell dual-use products, engage in co-development with Chinese military entities, and further PRC dual-use technologies across several capabilities. In particular, Airbus systemically furthered China's aerospace industrial base spanning decades. Beginning in 2006, Airbus Helicopters (then Eurocopter) jointly developed the Z-15 helicopter with the Harbin Aircraft Industry Group (HAIG),[23] while the same company developed military helicopters for the PLA.[24] HAIG's first engagement with Eurocopter Group started in the early 1980s. In 2023, Airbus announced the sale of helicopters advertised with stealth capabilities to a Chinese state-owned firm.[25] In October 2025, Airbus announced the opening of the second final assembly line ("FAL") in Tianjin, China.[26] Airbus also actively encouraged key suppliers to relocate from Europe to China.[27] As a result of Airbus's support for the Chinese aerospace industry, certain unilateral American sanctions would only provide an opening for Airbus to increase its market share. This report refers to this issue as the "Backfill Problem" where allied aerospace companies can backfill capabilities in the event the United States applied unilateral sanctions on the Chinese aerospace industry.

The Select Committee found that the problem was systemic, not confined to any one transaction or company. The broader system allowed commercial aerospace engagement that could strengthen firms connected to the PRC's military industrial base without triggering the safeguards designed to protect sensitive technology. The Select Committee does not investigate in the first instance to find potential violations of law; it seeks to illuminate areas where policymakers should consider change and generate policy recommendations. The Select Committee therefore makes the following findings:

- **Finding 1:** Western aerospace companies entered lawful commercial arrangements that transferred advanced technology, technical know-how, and Western expertise to Chinese aerospace firms.

- **Finding 2:** Honeywell Aerospace, GE Aerospace, and Collins Aerospace repeatedly sought and obtained licenses for controlled technology transfers involving PRC military end users and other military-linked entities as part of Chinese commercial aerospace platforms.

- **Finding 3:** Export controls relied on company due diligence even where commercial incentives favored continuity and past enforcement actions revealed compliance weaknesses.

- **Finding 4:** PRC-based joint ventures created a structural gap in U.S. national security review by allowing sensitive capabilities to move offshore outside the principal Committee on Foreign Investment in the United States ("CFIUS") framework.

- **Finding 5:** Unilateral U.S. restrictions would disadvantage American aerospace companies without denying China access to many Western technologies when allied firms backfill the resulting business.

Based on these findings, the Select Committee makes a series of policy recommendations to address defense contractors working for both the U.S. and Chinese industrial base, strengthening aerospace export controls, and tightening investment restrictions in the aerospace sector. Initially, the Select Committee addresses the issue of allied defense contractors, namely Airbus, benefiting both as a Pentagon contractor while simultaneously investing in the Chinese aerospace industrial base. This practice should be halted, and defense contractors must pick a side. Additionally, the United States must strengthen aerospace export controls on sales to China. However, the United States needs to work with allies and partners to jointly restrict this activity and its associated investment. Unilateral American restrictions may deprive China of certain capabilities, but they will also create an opening for European aerospace firms to backfill. Moreover, the U.S. government must require disclosure of these ties so government procurement officers can make informed decisions about how to award taxpayer funds. Finally, the U.S. should not sell its capabilities to European companies working with Chinese military entities. As discussed below, certain countries, mainly France, have a blocking statute that prohibits them from sharing information with the U.S. government as part of an investigation. Airbus even informed the Select Committee that when they were investigated by the Department of Justice, the blocking statute prohibited the sharing of documents. In this environment, U.S regulators cannot adequately investigate whether export control violations took place, making enforcement nearly impossible. CFIUS must address this situation by subjecting these countries to greater scrutiny when they acquire U.S.

companies. These policy recommendations are detailed more fully at the conclusion of this report.

These findings are best understood in the context of how the PRC organizes its aerospace industry. The Chinese firms that partnered with Western companies were not isolated commercial enterprises. They operated within a state-directed industrial system that concentrated aviation, propulsion, space, missile, and electronic capabilities across a small number of large conglomerates and their extensive networks of subsidiaries, research institutes, suppliers, and investment vehicles.

BACKGROUND: CHINA'S AEROSPACE SECTOR

During the 1990s and 2000s, Beijing repeatedly reorganized its aviation industry to consolidate major capabilities under large state-owned enterprises. The state domination of the sector signals Beijing's strategic view of the aerospace sector.

In 2008, the PRC recombined its two principal aviation conglomerates to form AVIC, the country's principal military aviation conglomerate and a major producer of military platforms.[28] AVIC oversees a sprawling network of thousands of subordinate entities, including subsidiaries, research institutes, factories, laboratories, departments, and workshops.[29] Its scale and breadth are roughly comparable to combining Lockheed Martin, Boeing Defense, Northrop Grumman, and several other major aerospace suppliers under one roof. Through its subsidiaries and research institutes, AVIC designs and manufactures most of the PLA's domestically produced military aircraft, including the J-20 stealth fighter, J-10 and J-16 fighters, Y-20 strategic transport, H-6 bomber, KJ-500 airborne early warning aircraft, Z-10 attack helicopter, and multiple families of unmanned aircraft.[30]

AVIC described MCF as its "historical mission" and "strengthening the military" as a primary responsibility.[31] Unlike its Western counterparts, AVIC's primary duty is not to shareholders, but to the PRC party-state and its defense goals.[32] In recognition of this role, the U.S. Department of the Treasury designated AVIC as a Non-SDN Chinese Military-Industrial Complex Company ("NS-CMIC") in 2021.[33]

The same year as AVIC's combination, 2008, Beijing established COMAC to lead development of large commercial aircraft, namely the ARJ21 (later renamed the C909), C919, and C929 commercial aircraft.[34] Although COMAC's ties to the PRC defense industrial base are less overt than AVIC's, its own records trace its core design institute directly to the 708 Engineering Design Group, formerly part of PLA Air Force Factory 5703.[35] Moreover, AVIC's involvement in COMAC signals COMAC's military applications. Although AVIC holds a minority share in COMAC, it maintains outsized influence on COMAC's operations.[36] Much of

COMAC's original leadership, employees, facilities, and technology came from AVIC, and COMAC continues to draw on AVIC talent and technology.[37]

The C919, China's commercial narrow-body airliner, has been repeatedly linked to the PRC's military-civil fusion strategy. Chinese military commentators identified it as a potential replacement for Y-8 and Y-9 special mission aircraft, including airborne early warning, reconnaissance, and anti-submarine platforms,[38] while a study coauthored by a PLA Naval Service Academy researcher called for using it to "develop new military aircraft" and "accelerate the modernization of the Chinese Air Force."[39] PRC authorities have likewise held up the C919 as a product of the aviation sector's "deep development of military-civil fusion,"[40] and in 2022, Xi Jinping called the program an embodiment of the "will of the state."[41]

Figure 2. Senior PRC and PLA Leadership Engagement with COMAC

Senior PLA Leader Visits COMAC Display at the Beijing Aviation Expo, 2015[42]



Xi Jinping Meets with C919 Project Team, 2022[43]



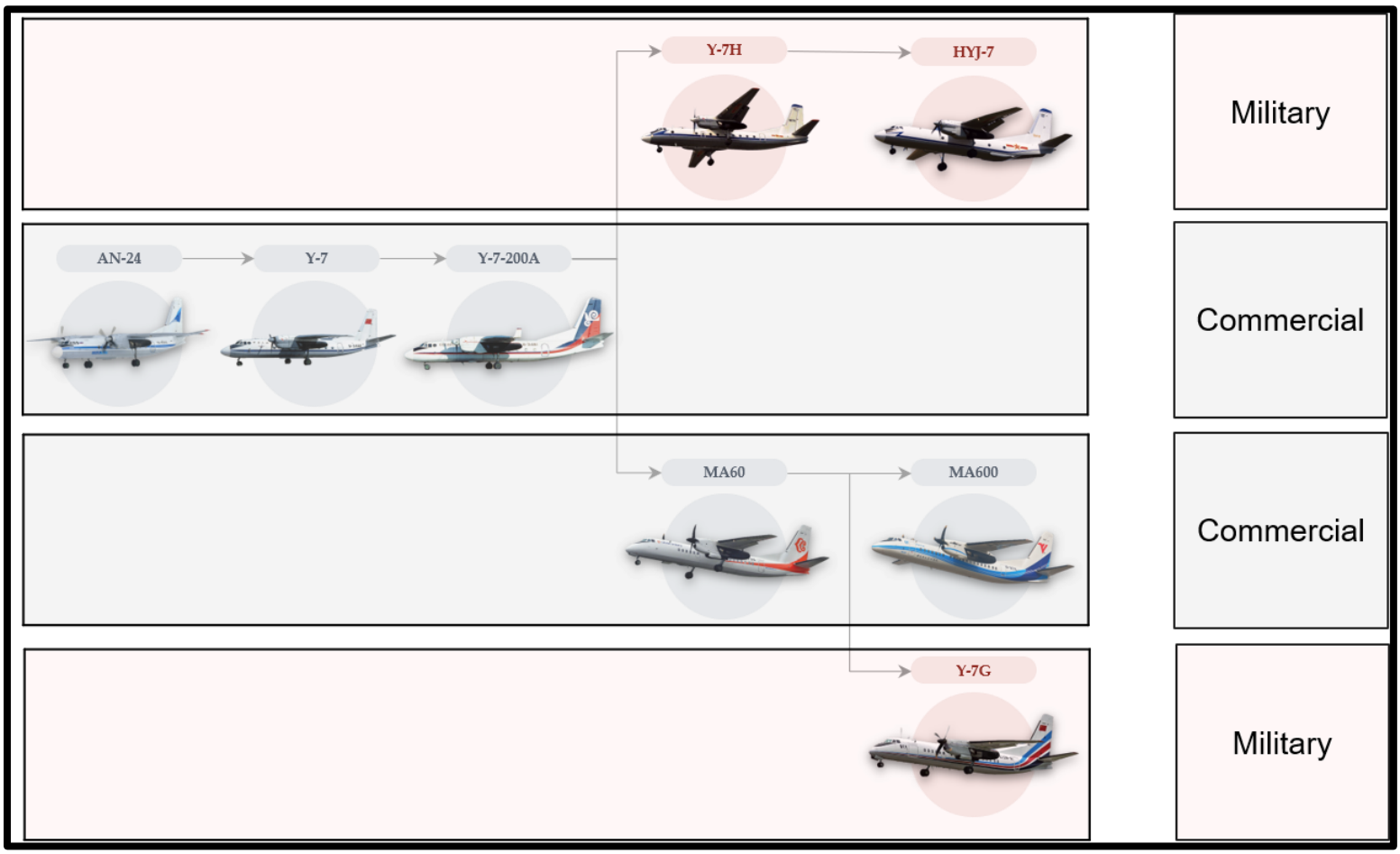
Beijing built similar institutional structures around other critical aerospace capabilities. The Aero Engine Corporation of China ("AECC") consolidates China's military and civilian aircraft engine industry.[44] The China Aerospace Science and Technology Corporation ("CASC") and China Aerospace Science and Industry Corporation ("CASIC") anchor major space and missile programs, while the China Electronics Technology Group Corporation ("CETC") and China Electronics Corporation ("CEC") underpin much of the military electronics and information technology base.[45] Together, these conglomerates sit atop extensive networks of subsidiaries, research institutes, laboratories, manufacturers, investment vehicles, and industrial partners.[46]

Building the institutions was only part of the challenge. Beijing also had to acquire technologies, know-how, and expertise that its domestic aerospace industry did not possess. It poured state capital, research funding, and industrial resources into indigenous development, while turning outward to fill remaining capability gaps through two principal channels: illicit acquisition and lawful commercial partnerships.

Over time, lawful commercial engagement offered a broader pathway. Beijing opened civil aviation to foreign investment and joint ventures then encouraged multinational firms to bring capital, technology, R&D capabilities, and management expertise into strategic high-technology sectors, including aviation.[47] During this time, the United States operated under the naïve assumption that commercial engagement with the PRC would lead to political liberalization. As a result, the United States encouraged companies to set up businesses in the PRC to take advantage of the significant market opportunity and grow their business. By 2017, AVIC established 16 joint ventures with foreign aerospace companies to supply critical systems for the C919, including avionics, flight controls, electrical power, fuel systems, and landing gear.[48]

However, this pattern of military-civil fusion long predates the C919. As **Figure 3** shows, PRC aerospace programs have used foreign or commercially oriented aircraft and technologies as starting points then iterated and adapted these platforms to meet military needs.

Figure 3. Selected Cases of Foreign and Commercial Aerospace Capabilities Carried into PRC Military Programs



The cases differ in their details, but the Select Committee's analysis revealed a similar playbook: foreign aircraft, components, and technical know-how entered China through commercial or other non-military channels, then helped build the engineering expertise, manufacturing capacity, supplier base, and systems-integration capabilities needed for later civilian and military programs. Initial iterations of these platforms were designed for commercial use, while later iterations were adapted for the military.

PRC officials described these commercial relationships as vehicles for building precisely those indigenous capabilities. The Ministry of Science and Technology ("MOST") said the C919 mastered more than 100 core and key technologies and credited international joint ventures with helping develop domestic propulsion, avionics, flight control, power, fuel, and landing gear industries.[49] The Civil Aviation Administration of China ("CAAC") made a similar point about the Y-7-200A, later renamed the MA-60, saying AVIC Xi'an Aircraft Industry Group Company Limited ("XAC") developed the aircraft by "absorbing advanced aviation technology" and "making extensive use of mature foreign components," including Pratt & Whitney's PW127C engine.[50] AVIC described development of the Z-8 from the French SA-321 Super Frelon in even more explicit terms, calling it a process of "introduction, digestion, absorption, and re-innovation."[51]

Commercial aerospace partnerships build capabilities that extend far beyond a single aircraft. Transferred hardware, software, and joint-venture expertise allow Chinese engineers to master system integration, factories to refine precision manufacturing, and suppliers to meet aerospace standards. Crucially, state-backed defense firms accumulate the tooling, production data, workforce, and management know-how that carry directly into subsequent platforms.[52] Civil transfers today directly build the industrial capacity needed for PRC military platforms tomorrow.[53]

The national security significance of these partnerships extends beyond the platform named in a license application. Aerospace capability is cumulative and generational: expertise, production capacity, and supplier networks built for one program can persist and support later ones. The C919 sits at the center of that dynamic. The sections below examine how Western joint ventures and technology transfers helped build C919 capabilities that the PRC aerospace sector can localize, absorb, and apply across future programs.

PART I: TECHNOLOGY TRANSFER & INDIGENOUS CAPABILITIES THROUGH COMMERCIAL PARTNERSHIPS

The Select Committee found that Western aerospace companies became an important source of the technology, expertise, and production capabilities Beijing sought to build domestically. These transfers occurred through legal commercial arrangements and took several forms.

Finding 1: Western aerospace companies entered lawful commercial arrangements that transferred advanced technology, technical know-how, and Western expertise to Chinese aerospace firms.

The Select Committee identified at least six U.S.-China aerospace partnerships spanning avionics, surveillance, flight controls, electrical power, as well as wheels and brakes, along with additional allied-country partnerships supporting the C919 and related programs. The case studies that follow focus on GE Aerospace, Honeywell Aerospace Inc. ("Honeywell Aerospace"), and Collins Aerospace's joint venture agreements. For each partnership, the Select Committee requested and reviewed nonpublic materials concerning the details of the relationship.

Table 1. Survey of Existing U.S.-China Aerospace Joint Ventures

Joint Venture	Western Firm	Chinese Firm	Year	U.S. / China	Technology
Honeywell Boyun Aero Systems (Hunan) Co., Ltd.	Honeywell Aerospace	Hunan Boyun New Materials Co., Ltd.	2012	51% / 49%	Wheels & Brakes
Honfei Flight Controls Technology Co., Ltd.	Honeywell Aerospace	AVIC Xi'an Flight Automatic Control Research Institute Co., Ltd.*	2013	50% / 50%	Flight Control Systems
Aviage Systems Co., Ltd.	GE Aerospace	AVIC Civil Aviation Electronics Co., Ltd.	2012	50% / 50%	Integrated Avionics
AVIC Leihua Rockwell Collins Avionics Co., Ltd.	Collins Aerospace	AVIC Leihua Electronic Technology Research Institute*	2013	1% / 99%	Integrated Surveillance Systems
Rockwell Collins CETC Avionics Co., Ltd.	Collins Aerospace	CETC Avionics Co., Ltd.	2013	1% / 99%	Communications & Navigation Systems
Xi'an AVIC Hamilton Sundstrand Aviation Electric Co., Ltd.	Collins Aerospace	AVIC Shaanxi Aero Electric Co., Ltd.*	2012	50% / 50%	Electrical Power Systems

* Added to U.S. BIS MEU List.

Across their productions to the Select Committee, the aerospace companies consistently portrayed their involvement in the PRC's defense industrial base as discrete, limited, and lawful. That framing misses the cumulative effect of their activities. Beijing did not need any one Western company to supply an entire aircraft to upgrade its aerospace sector. It needed different companies to fill capability gaps. As shown in the chart above, those contributions spanned avionics, surveillance, flight controls, electrical power, and braking. Each company's role may have been narrow in isolation, but together those roles helped Beijing assemble many of the technological capabilities needed to build an indigenous aerospace industry.

CASE STUDY: HONEYWELL AEROSPACE

Honeywell International Inc. ("Honeywell") is a major American industrial and aerospace company headquartered in Charlotte, North Carolina. Honeywell Aerospace, headquartered in Phoenix, Arizona, became a separate company from Honeywell in June 2026.[54] Honeywell Aerospace was Honeywell's aerospace and

defense unit. Honeywell Aerospace is a critical supplier to the U.S. military. The DoW described Honeywell Aerospace's navigation, missile actuation, and electronic warfare technologies as forming the "technological backbone of America's military advantage."[55] Honeywell Aerospace technology is integrated across a wide range of frontline defense platforms, including advanced missiles, the M1 Abrams tank, C-130 transport aircraft, Apache and Chinook helicopters, as well as the F-22 and F-35 fighter jets.[56] Honeywell Aerospace generated approximately $17.5 billion in sales in 2025, with roughly 40 percent derived from defense and space customers.[57]

Honeywell Aerospace's role in the U.S. defense industrial base makes its relationships with the PRC aerospace sector particularly significant. Honeywell Aerospace's joint ventures were established when U.S. policy towards the PRC actively encouraged commercial engagement.[58] The resulting broader presence in the PRC encompasses 14 affiliates, facilities in six PRC cities, and approximately 600 employees.[59] Honeywell Aerospace represented to the Select Committee that its aerospace presence in the PRC has been and remains "primarily focused on supporting the maintenance and repair of Boeing and Airbus commercial aircraft operating in China."[60] Honeywell Aerospace also supplies systems for both COMAC's C909 regional jet, formerly the ARJ21, and its C919 narrowbody aircraft.[61] For the C919, Honeywell Aerospace holds contracts for four systems, with the flight control and wheel and brake programs involving PRC joint ventures where Honeywell Aerospace Supplies (Shanghai) Co., Ltd. ("Honeywell China") is the Honeywell shareholder.[62]

HBAS: WHEELS AND BRAKES

In 2012, Honeywell China established a joint venture to produce C919 components with Hunan Boyun New Materials Co., Ltd. ("Boyun"). Boyun operates as a PRC defense enterprise built to commercialize Huang Boyun's aerospace expertise in indigenous aircraft-braking systems after he received his Ph.D. in the United States,[63] and conducted postdoctoral research in Tennessee.[64] The partnership also extended to Boyun's wholly owned subsidiary, Changsha Xinhang Wheel & Brake Co., Ltd. ("Xinhang"), a PLA defense contractor, through ancillary agreements requiring Honeywell Aerospace to transfer technology and provide technical assistance to Xinhang.[65]

Honeywell Aerospace owns 51 percent of HBAS and Boyun 49 percent, with equal board representation. Honeywell Aerospace seconds two employees to the venture, including its general manager.[66] A 2012 Technology License Agreement among Honeywell Aerospace, Boyun, Xinhang, and HBAS governs any access that Boyun or Xinhang may obtain relative to Honeywell Aerospace 's "C919 Background Technology", as well as Honeywell Aerospace's access to Boyun technology.[67] The Honeywell Aerospace technology conveyed to Boyun was limited to C919 carbon brake disc geometry requirements, while the technology conveyed to Xinhang was specific to the machining of structural parts as defined in the workshare agreement.[68]

Under the division of labor, Honeywell Aerospace provided components, machining, and coating technology, Boyun supplied its proprietary Thermal Gradient Chemical Vapor Infiltration ("CVI") process for carbon discs, and Xinhang conducted dynamometer testing, with HBAS integrating the final assembly.[69] Honeywell Aerospace represented to the Select Committee that the workshare in place today is limited to carbon disc manufacturing, with densification using Boyun's proprietary CVI process, machining and antioxidant coating protection using Honeywell Aerospace's technology, and Xinhang performing dynamometer testing. The parties, however, defined the venture's technical scope in contrasting terms. In correspondence with Select Committee staff, Honeywell Aerospace maintained that HBAS focuses on "safety assurance, not technical advancement" and "does not engage in design, engineering, or R&D activities."[70] Boyun, by contrast, informed its investors that HBAS would execute full wheel-and-brake system "design, research and development, testing, component manufacturing, [and] system assembly."[71]

The limits of Boyun's technical contribution became evident when its carbon braking material failed to meet performance variation and durability requirements necessary to support aircraft certification..[72] Although Honeywell Aerospace worked with COMAC to find a path to certify Boyun's baseline CVI process for the C919, Boyun used the qualification failure to request an export license for Honeywell Aerospace's proprietary Isothermal Chemical Vapor Infiltration ("ICVI") process, an advanced method needed to produce ultra-durable carbon brakes.[73] Honeywell Aerospace refused the request and kept the technology outside China. The episode nevertheless demonstrated how a commercial partnership could be used by a PRC defense contractor to upgrade its domestic baseline and seek restricted U.S. technology when local capabilities fell short.

Beyond individual technology transfers, the C919 program provided the physical foundation to expand PRC military production. Boyun's corporate filings confirm that while Honeywell Aerospace's technical assistance targeted civilian C919 manufacturing, Boyun used the broader expansion driven by the C919 program to enlarge physical facilities and testing equipment that were engineered to concurrently supply C919 components and domestic "military fighters and transport aircraft."[74]

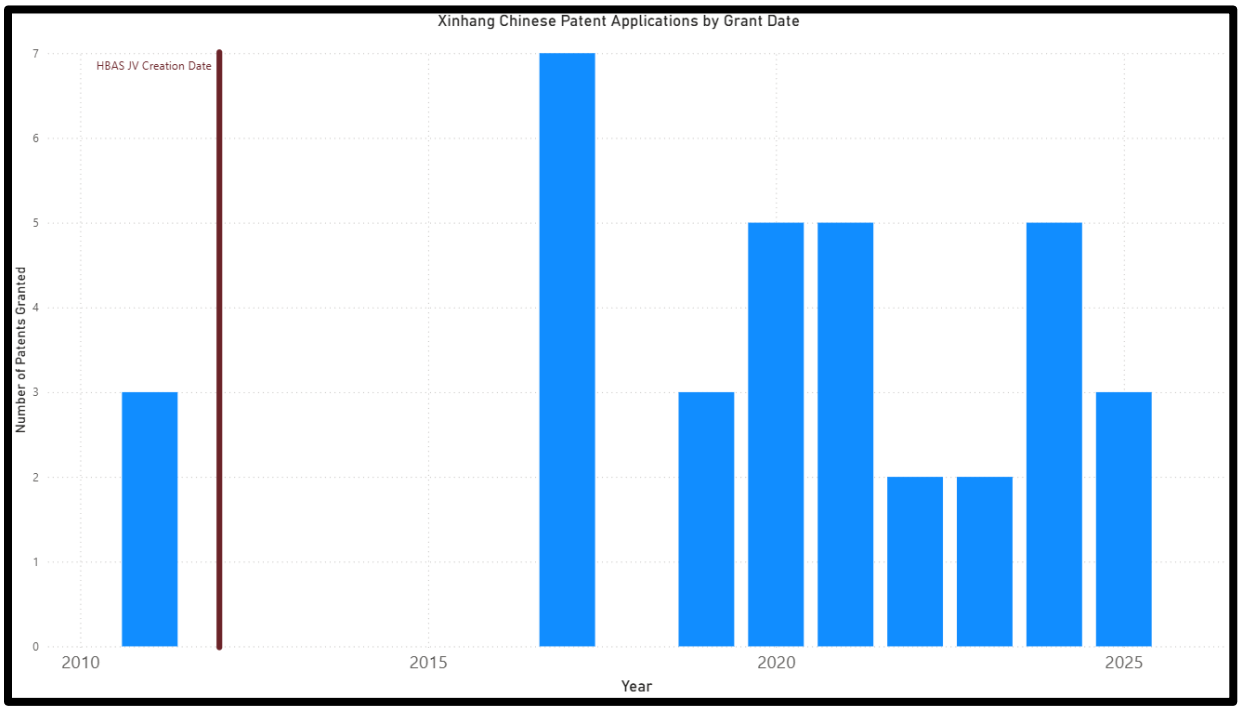
The physical footprint reflected the same commercial-military overlap. HBAS, Boyun, and Xinhang are clustered in Changsha's Lugu industrial base, as shown in **Figure 4**. A 2014 article by a department director at the National University of Defense Technology ("NUDT")[75] identified the introduction of Honeywell to jointly produce large-aircraft wheel-and-brake systems as an example of the region's "deepening" military-civil cooperation.[76] By 2016, Hunan authorities described Lugu as home to more than 100 enterprises engaged in MCF, specifically identifying Boyun and Honeywell[77] within its large-aircraft industrial cluster, and described NUDT as an important source of technical expertise for the local MCF industry.[78]

Figure 4. Co-Location of HBAS, Boyun, and Xinhang in Changsha



Against that backdrop, Boyun and Xinhang continued to expand their aerospace capabilities. Boyun's government subsidies rose from roughly 3 million RMB (approximately $447,000) in 2011 to approximately 12 million RMB (approximately $1.7M) in 2012 as the Honeywell Aerospace joint venture and C919 program were getting underway.[79] By November 2014, the new production facility was operating two months ahead of schedule, and by 2016, Xinhang was mass-producing wheel-and-brake systems for existing military aircraft platforms.[80] The C919 wheel-and-brake system Xinhang was developing with Honeywell Aerospace was a distinct product line that had not yet entered mass production. Xinhang's patent activity also increased during the Honeywell Aerospace relationship, as shown in **Figure 5**.

Figure 5. Xinhang Patent Activity



While patent activity alone does not prove technology transfer, the increase is consistent with Boyun and Xinhang's own statements that they were expanding their aerospace capabilities during the Honeywell Aerospace relationship.[81] Overall, these developments contributed to the same ecosystem. By 2020, local reporting described the lab that created the C919 brake technologies as also supplying copper-carbon sealing rings for Long March 5, 6, and 7 rockets.[82] However, the Select Committee did not identify any evidence showing the learnings from the joint venture were applied to the Long March.

HONEYWELL HONFEI: FLIGHT CONTROLS

In 2013, Honeywell China and AVIC Xi'an Flight Automatic Control Research Institute ("FACRI") established HonFei Flight Controls Technology Co., Ltd. ("HonFei") in Xi'an to design, develop, produce, test, qualify, sell and market C919 flight-control systems.[83] FACRI, also known as AVIC's 618 Institute, develops civilian and military flight-control technologies, including systems for the PLA's J-10, J-11, J-15, and J-16 fighter aircraft.[84] The U.S. government designated FACRI a military end user and subjected it to export-control restrictions in 2020.[85]

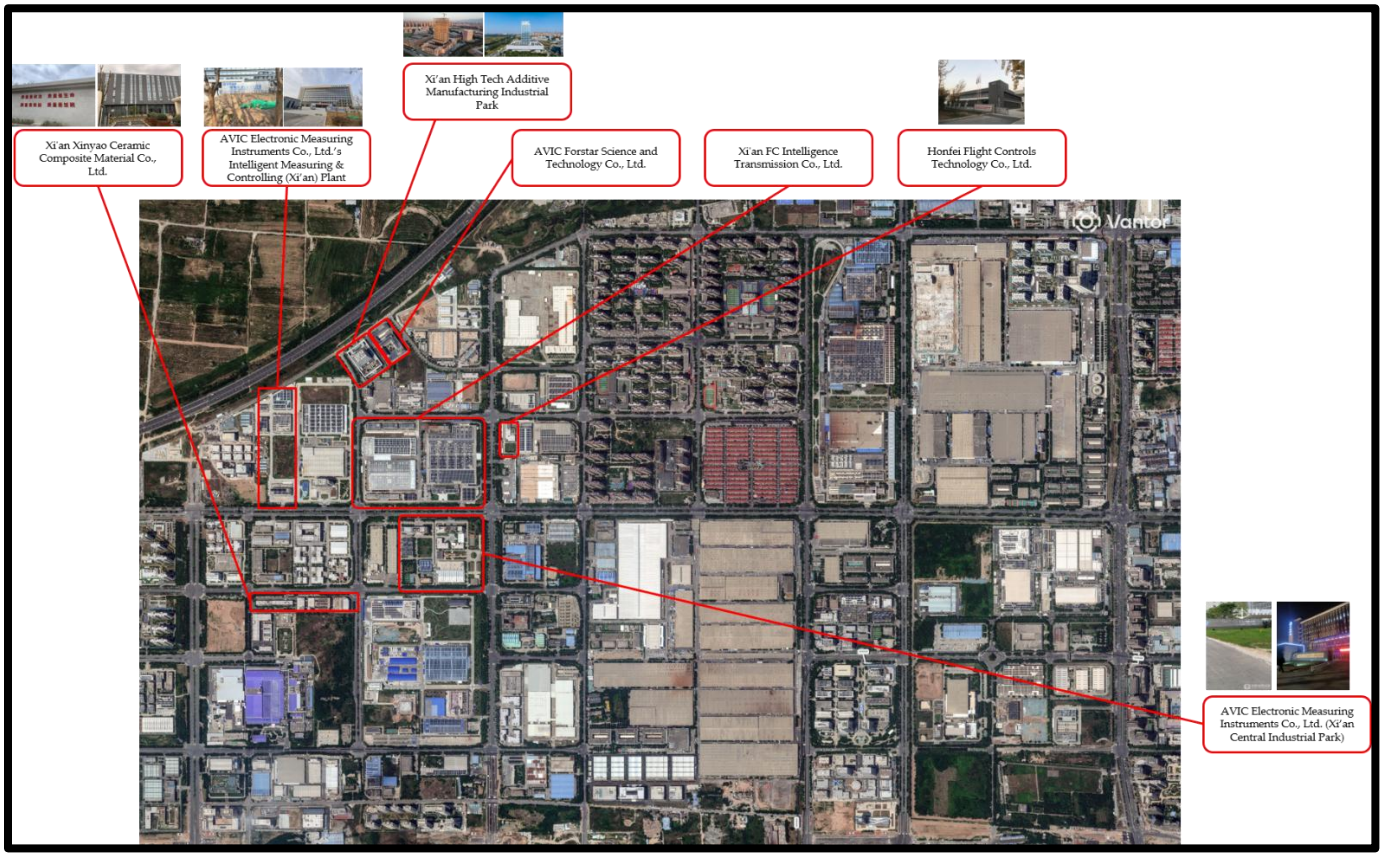
Honeywell China and FACRI each own 50 percent of HonFei, with equal representation on its eight-member board.[86] Day-to-day operations are led by a Honeywell Aerospace-seconded general manager and a FACRI-nominated deputy general manager.[87] Honeywell Aerospace seconds[88] three employees to

the venture, including the general manager.[89] Honeywell Aerospace's joint venture records identify FACRI official Song Kepu as a signatory to the agreement establishing HonFei.[90] Song, who later served as FACRI director and HonFei chairman, previously worked on flight-control systems for the JH-7 fighter jet, JF-17 fighter jet, and an unnamed missile-guidance system.[91]

Honeywell Aerospace described HonFei's operational role as "primarily logistical" and said the venture did not conduct "final testing, assembly, or new product engineering."[92] The governing agreements, however, assigned HonFei a broader technical role. Under the 2013 "C919 FCS Cooperative Technology Development Contract," Honeywell Aerospace, FACRI, and HonFei were assigned development work and HonFei received a royalty-free license under Honeywell Aerospace's "Sole Foreground Technology" to "design, develop, test, qualify, make, have made, sell, offer to sell, import and export" the flight-control system or its components.[93] A separate Flight Control Technology License Agreement entitled FACRI and HonFei to receive "data, know-how, and assistance" needed for their development workshares, even as Honeywell Aerospace retained tight control over its source code.[94] Taken together, these agreements show that HonFei was structured to perform technical development functions beyond the logistical role Honeywell Aerospace emphasized in its correspondence with Select Committee staff.

Honeywell Aerospace's own description of the HonFei facility, together with public reporting and satellite imagery analyzed by the Select Committee, indicates a broader operational and technical role than logistics alone. The imagery shows HonFei physically co-located within FACRI's broader footprint in the Xi'an High-Tech Industries Development Zone, as shown in **Figure 6**. That location is itself significant. By 2015, PRC state media reported that eight of the PRC's eleven major defense conglomerates had established operations in the zone across aviation, aerospace, military electronics, weapons, shipbuilding, and nuclear industries, and explicitly cited Honeywell's partnership with FACRI as an example of MCF activity there.[95]

Figure 6. Co-Location of HonFei and FACRI in the Xi'an High-Tech Industries Development Zone



Honeywell Aerospace's representations to the Select Committee further indicate that the site contained production, repair, and quality-control functions subject to physical and information controls restricting FACRI personnel from sensitive areas and technical data.[96] The arrangement therefore placed meaningful aerospace production and technical capabilities alongside FACRI personnel and relied on Honeywell Aerospace's internal controls to keep sensitive functions segregated. Honeywell Aerospace represented that those controls were effective, but the Select Committee was unable to independently verify those boundaries since they were physically located in China.[97]

This established foundation soon bore fruit outside the C919 program. Honeywell Aerospace later confirmed that HonFei employees developed a drone-related package-delivery mechanism that the venture patented in the PRC and treated as "Joint Venture IP."[98] Honeywell Aerospace and HonFei have since quarantined all drone related hardware and technology and Honeywell Aerospace is no longer engaged in any drone-related work in China. Around the same period, FACRI was also filing patents covering onboard database and resource-management software,[99] online software loading,[100] and AI-enabled scene-matching navigation.[101]

Taken as a whole, the Honeywell Aerospace case illustrates China's pattern for aerospace development. First, create a "commercial" program to lure in a Western aerospace firm into investing in the Chinese aerospace industrial base. Second, work with that aerospace firm to level up the Chinese company's capabilities and independent technical developments. Third, apply the technology to programs of strategic importance.

CASE STUDY: GE AEROSPACE

GE Aerospace,[102] one of the world's largest aerospace propulsion and systems companies. GE Aerospace's importance to U.S. national security extends across generations of military aircraft, with its engines powering platforms including the B-2 bomber; F-15 and F-16 fighters; and Black Hawk and Apache helicopters. GE Aerospace maintains an extensive United States presence with 67 manufacturing and service operations facilities across 22 states, including its headquarters in Evendale, Ohio. [103] The company's 30,000 U.S. employees engage in manufacturing, servicing, and support all aspects of its business.[104] In 2025, GE Aerospace generated approximately $45.9 billion in revenue, with its Defense & Propulsion Technologies segment accounting for roughly 23 percent of the total.[105]

That role makes GE Aerospace's extensive presence in the PRC aerospace sector particularly consequential, given documented failures to prevent sensitive U.S. aerospace technology from reaching the PRC.[106] GE Aerospace's footprint dates to 1980 and has since expanded across engine sales, maintenance, manufacturing, training, and technical support, with more than 7,800 engines in service and its only 24-hour fleet support center outside the United States located in Shanghai.[107] GE Aerospace characterizes this business as primarily focused on servicing customer engines and says its sole PRC manufacturing site produces only "low-complexity, conventional engine hardware."[108] Contemporaneous GE Aerospace press releases discuss production of low pressure turbine disks, engine seals, high pressure turbine shafts, compressor shafts, and high pressure turbine blade retainers.[109] Within that broader footprint, however, GE Aerospace also became a key Western partner in the PRC's commercial aircraft programs, including the C919.

AVIAGE SYSTEMS: AVIONICS

In January 2011, GE Aerospace and AVIC Civil Aviation Electronics Co., Ltd. ("AVIC CAE") established Aviage Systems Co., Ltd. ("Aviage") in Shanghai to supply avionics systems for COMAC aircraft, including the C919.[110] AVIC CAE is a subsidiary of AVIC, the state-owned defense conglomerate that develops military aircraft for the PLA, and serves as a corporate bridge to AVIC's defense avionics enterprise.[111] As part of the deal, GE transferred foundational intellectual property for integrated modular avionics ("IMA") for use on COMAC aircraft. IMA represents a core dual-use architecture that serves as the digital processing backbone for both commercial airliners and advanced PLA fighters like the J-20.[112]

GE Aerospace and AVIC CAE each own 50 percent of Aviage, with representation split across its board and executive leadership.[113] GE Aerospace contributed baseline IMA intellectual property in a "one and done" transfer, while AVIC provided roughly $650 million to fund development.[114] Aviage employed about 300 people, with 85 percent being engineers, who used that baseline technology to build a C919-specific branch as COMAC's requirements evolved.[115] Provisions in a later contract amendment show military diversion risks were expressly anticipated, establishing a two-year post-employment ban on joining PLA-oriented enterprises, granting GE audit rights, and requiring periodic civil-only compliance reports.

The Select Committee, however, cannot independently verify Aviage's governance or partner obligations **because GE Aerospace withheld the underlying joint venture agreement despite repeated staff requests and two direct requests from Chairman Moolenaar in late 2025 and May 2026.** Although GE allowed staff to review the agreement's first amendment, withholding the original and complete document prevents the Committee from assessing Aviage's initial scope, partner responsibilities, or claims that the deal had been "carefully negotiated" to protect GE Aerospace's intellectual property.[116]

GE Aerospace nevertheless portrayed Aviage to the Select Committee as a narrowly scoped civil venture. The company stated that Aviage was formed with a "civil-only subsidiary of AVIC," that its activities were "primarily supporting the C919 aircraft," and that GE remained the "sole developer" of exported U.S. technology while partner entities were excluded from product development.[117] Publicly available information and government records show GE Aerospace's joint venture partner worked hand-in-hand with AVIC's military enterprises. GE Aerospace produced two Department of Commerce Bureau of Industry and Security ("BIS") licenses detailing exports to China. They show that as late as 2023, GE Aerospace was actively exporting, with U.S. government approval, controlled C919 avionics hardware, software, and technology to Aviage for development, certification testing, production, and use, after which Aviage integrated those inputs directly into the aircraft's broader avionics architecture.[118]

AVIC CAE was not meaningfully separate from AVIC's military avionics enterprise. Corporate records show that AVIC CAE is 45 percent owned by AVIC Aerospace Systems Co., Ltd., which is itself 94.91 percent owned directly by AVIC.[119] Because AVIC Aerospace Systems oversees AVIC's primary military avionics portfolio, AVIC CAE is directly controlled through AVIC's defense apparatus. This ownership had a real-world impact on the company's operations. In one instance, Aviage subcontracted specific components, including the cockpit display system, to AVIC Aeronautical Radio Electronics Research Institute ("615 Institute"), a major AVIC military research institute that develops systems for both civilian and military aircraft, including the J-8, J-10, and J-20 fighter jets.[120] The two entities also shared senior personnel, including Li Feng, who held leadership roles at AVIC CAE and the 615 Institute, while former 615 Institute director Wang Guoqing later became Aviage's Chief Aircraft Systems Engineer.[121] When the C919

program encountered difficulties in 2020, the institute reassigned personnel from its military aircraft programs to the effort and formed a joint team with COMAC and Aviage that met daily to work through development tasks.[122] As **Figure 7** shows, the 615 Institute sits across the street from Aviage in Shanghai's Zizhu High-Tech Industrial Development Zone.

Figure 7. Map of Zizhu High-Tech Industrial Development Zone



Moreover, Aviage's activities were not limited to, or even framed by its own leadership, as principally about the C919. In a 2021 interview, Aviage President Zhang Yuanzhong said the company was established "not for the C919 project alone," but to "jointly develop the new field of civil avionics."[123] He said Aviage had since expanded into cockpit speech recognition, AI analysis of flight data, airborne BeiDou communications and navigation, and the C929 widebody program.[124] Zhang also said that while "many resources" initially came from GE Aerospace, Aviage's personnel and engineering capabilities, particularly in system integration, had grown beyond GE Aerospace's own business scope.[125]

Several of those areas also have military applications. BeiDou is the PRC's satellite-based positioning, navigation, and timing system.[126] PRC military commentary also identified the C929 as a possible platform for aerial refueling, airborne early warning, and electronic warfare variants.[127] Aviage also expanded into the PRC electric vertical takeoff and landing ("eVTOL") market through its AvioNova brand, supplying flight controls, sensors, and other avionics.[128] PRC official sources linked the broader "low-altitude economy," including eVTOL and unmanned aircraft, to national defense and unmanned combat applications.[129]

In sum, GE Aerospace continues development of dual-use technology and works with entities tied to China's military and aerospace industrial base. At the same time, GE Aerospace withheld from the Select Committee the original agreement that governs the primary relationship with its Chinese business partner.

CASE STUDY: COLLINS AEROSPACE

Collins Aerospace, a business of RTX Corporation ("RTX"), is one of the world's largest aerospace and defense systems suppliers. It was formed in November 2018, when United Technologies Corporation ("UTC") acquired Rockwell Collins, Inc. ("Rockwell Collins") and combined it with UTC Aerospace Systems. In April 2020, UTC merged with Raytheon Company to form Raytheon Technologies Corporation, renamed RTX Corporation in 2023. Collins Aerospace remains a principal RTX business, supplying avionics, communications, navigation, sensors, flight controls, and other systems used across commercial as well as U.S. and allied military aircraft.

Against that backdrop, Collins Aerospace's extensive ties to the PRC aerospace sector are particularly consequential. Through Collins Aerospace and its predecessor companies, the company established at least three joint ventures with PRC aerospace and defense entities supporting the C919 program, including surveillance, communications and navigation, and aircraft electrical power systems. These ventures were part of a broader PRC footprint that included ten operating sites and eight joint ventures. As discussed in the following section, Collins Aerospace also identified multiple MEU licenses across its AVIC joint ventures.[130]

Those relationships persisted even as Beijing retaliated against Collins Aerospace's parent company for supporting U.S. security commitments to Taiwan. In October 2020, Beijing announced sanctions against Raytheon over U.S. arms sales to Taiwan, and in February 2022 announced unspecified countermeasures on Raytheon Technologies Corporation under the PRC's Anti-Foreign Sanctions Law.[131]

ALRAC: SURVEILLANCE

In 2012, Rockwell Collins established AVIC Leihua Rockwell Collins Avionics Co., Ltd. ("ALRAC") with Wuxi AVIC Leihua Avionics Equipment Co., Ltd. ("AVIC Wuxi") to develop and produce integrated surveillance systems ("ISS") for the C919.[132] AVIC Wuxi was later deregistered, and current corporate records identify AVIC Wuxi Radar Technology Co., Ltd. ("AVIC Wuxi Radar") as ALRAC's AVIC shareholder.[133] Documents produced to the Select Committee show that Suzhou Changfeng Aviation Electronics Co., Ltd. ("Suzhou Changfeng"), then operating as AVIC (Suzhou) Radar and Electronic Technology Co., Ltd. ("AVIC Suzhou Radar"), and AVIC Leihua Electronic Technology Research Institute ("LETRI") were also parties to related agreements governing

the venture, including a separate Work Allocation Agreement assigning LETRI a technical role in the C919 surveillance system.[134]

The Select Committee's review of the underlying agreements shows a stark mismatch between capital contributions and economic returns. Under the 2012 agreement, AVIC Wuxi contributed 99 percent of ALRAC's registered capital and Rockwell Collins just 1 percent, while the parties split profits equally.[135] Rockwell Collins primarily contributed intellectual property. That structure suggests the parties placed substantial value on the intellectual property Rockwell Collins brought to the venture.

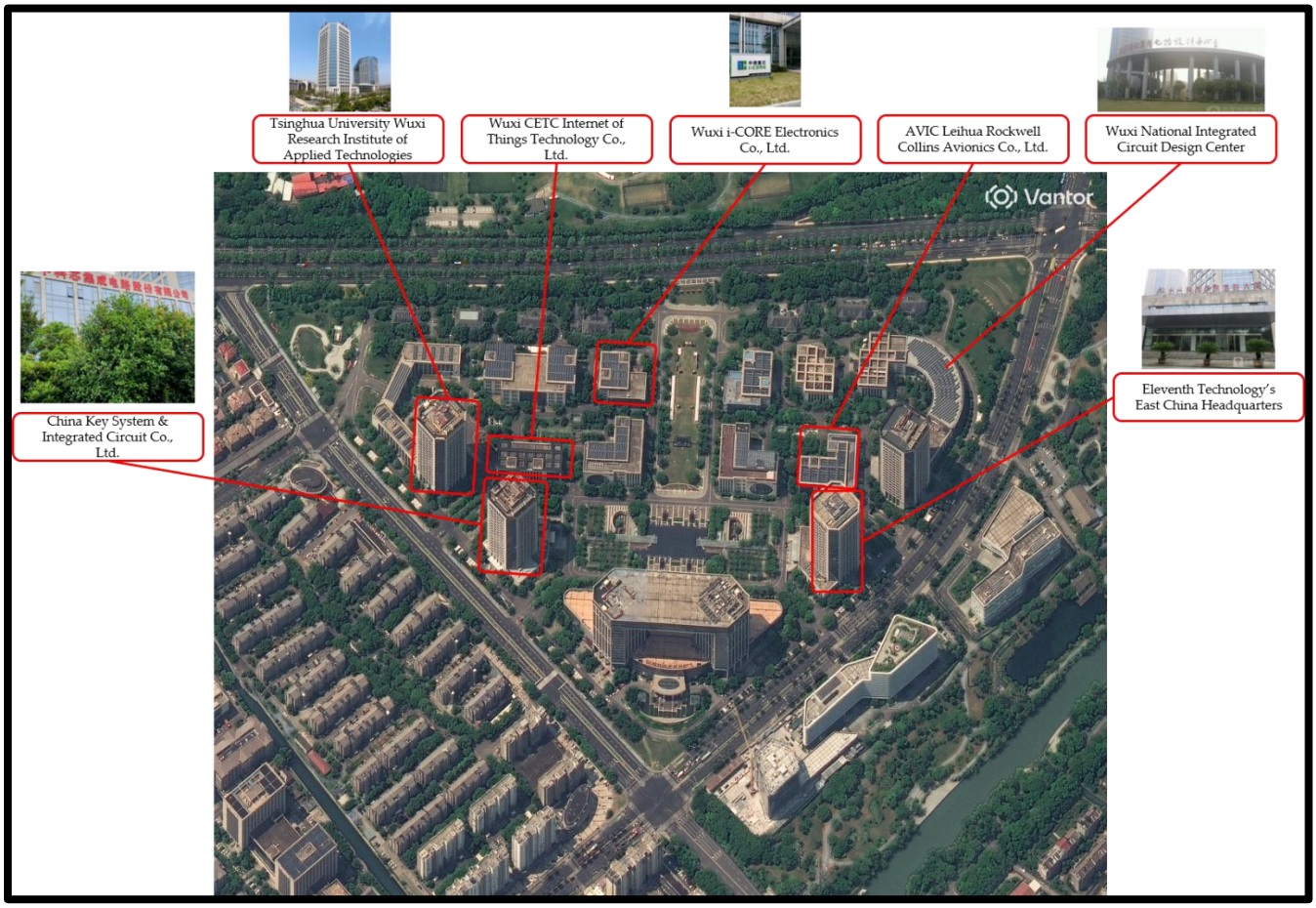
The agreement also spells out what Rockwell Collins was expected to bring to the venture and what the Chinese side was meant to gain from it. Rockwell Collins would contribute its "advanced avionics technology" and "international avionics technical services," while ALRAC would use those capabilities to build Chinese "self-innovation capability" and "boost the development and prosperity of the commercial aviation sector of the PRC."[136] Those transfers remained subject to U.S. export controls, and Collins Aerospace obtained licenses to continue ISS-related work after BIS designated LETRI as a Military End User ("MEU") in 2020.[137] The parties further committed to making ALRAC a "center of excellence in the PRC" for the surveillance system and other avionics products,[138] a broader objective not expressly limited to civilian applications.[139]

The significance of that capability-building effort becomes clearer when viewed against the identities of ALRAC's Chinese participants. AVIC Wuxi Radar is wholly owned by AVIC Airborne Systems Co., Ltd. ("AVIC Airborne Systems"), AVIC's principal platform for military avionics and airborne electromechanical systems.[140] LETRI, also known as the 607 Institute, is AVIC's principal airborne radar research institute and has long developed radar systems for Chinese combat aircraft, including the JL-7 and JL-10A.[141] Suzhou Changfeng is an AVIC avionics research and development unit whose work includes integrated displays, aircraft intake controls, and engine measurement and control systems for military aircraft[142] and Unmanned Aerial Vehicles.[143]

Furthermore, as shown in **Figure 8**, ALRAC is located in the Wuxi National Integrated Circuit Design Center, a roughly 50-acre government-backed research and development park housing more than 160 integrated-circuit and related companies.[144] Tenants include CETC subsidiaries China Key System & Integrated Circuit Co., Ltd. ("CKSIC") and Wuxi Microelectronics Research Center ("CETC's 58th Research Institute").[145] Chinese sources identify CKSIC as a core military integrated-circuit research and production institute and a major supplier of military chips,[146] while CETC's 58th Research Institute is described as a "key backbone" for the "research, development, and production of military integrated circuits."[147] The institute also jointly operates a key laboratory with Nanjing University of Aeronautics and Astronautics[148] focused on chips and microsystems for "aviation, aerospace, and national defense,"[149] which has separately worked with COMAC on large-aircraft component validation, airworthiness research, technical standards, and related technology development.[150] Collins Aerospace

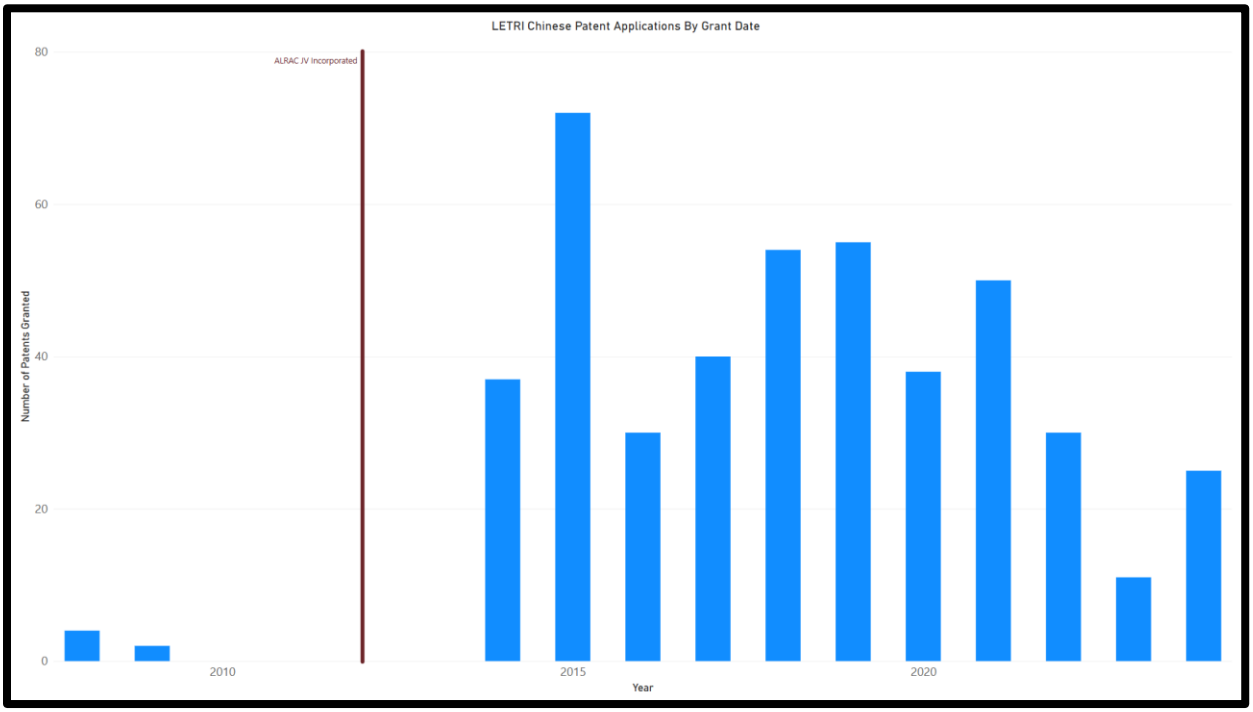
represented to the Select Committee that ALRAC does not work with these parties and has not provided any information to them, as reflected in Collins Aerospace's licenses.[151] Since these facilities are physically located in China, the Select Committee was unable to independently verify this statement.

Figure 8. ALRAC at the Wuxi National Integrated Circuit Design Center



The capability-building envisioned in the 2012 agreements was followed by measurable technical gains. In 2022, two years after being added to the BIS MEU list, LETRI announced a regulatory milestone for a weather-radar flat plate antenna developed by LETRI to meet Collins Aerospace specifications and requirements.[152] This weather-radar antenna received Technical Standard Order ("TSO") authorization from the U.S. Federal Aviation Administration ("FAA") for COMAC's C919.[153] At the time of its announcement, one observer highlighted it was the "the first FAA TSO certified avionics component to be developed and manufactured by a company in China, with more on the way."[154] By 2025, LETRI was advertising a broader portfolio of radar technologies,[155] including advanced weather radar and synthetic aperture radar.[156] Its technical output also increased markedly after ALRAC's establishment. As shown in **Figure 9**, WireScreen data indicate a sharp rise in patents granted to LETRI by the PRC government in the years following the venture's creation.

Figure 9. LETRI Patent Activity



RCCAC: COMMUNICATIONS & NAVIGATION

In 2010, COMAC selected CETC Avionics Co., Ltd. ("CETCA") and Rockwell Collins to jointly supply the C919's communications and navigation system through a 50/50, $100 million joint venture in Chengdu.[157] The partners formally established Rockwell Collins CETC Avionics Co., Ltd. ("RCCAC") in 2014 to develop and assemble the system. From the outset, however, RCCAC was intended to support a broader range of PRC aircraft. At its opening, then Rockwell Collins CEO and President Kelly Ortberg said RCCAC would also support "other programs in China."[158]

That broader mandate placed Collins Aerospace technology inside an enterprise closely tied to the PRC defense industrial base. CETC created CETCA in Chengdu in 2009 by drawing on seven CETC research institutes, several of which developed radar, navigation, communications, command and control, electronic warfare, and computing systems for the PLA.[159] CETCA later described its own business as spanning both "civil aviation and military-civil fusion."[160] Rockwell Collins technology also was not new to the PRC military aviation sector: its systems were already used aboard PRC military aircraft, including the Y-8 transport.[161]

Here again, the Select Committee's review of the underlying agreements shows a stark mismatch between capital contributions and economic returns. Under the 2014 agreement, CETCA contributed 99 percent of RCCAC's registered capital and Rockwell Collins just 1 percent, while the parties split profits equally.[162]

That structure suggests the parties placed substantial value on what Rockwell Collins brought to the venture beyond cash.

The agreement also spells out what Rockwell Collins was expected to bring to the venture and what the Chinese side was meant to gain from it. Rockwell Collins agreed to grant the JV a license to use its "advanced technologies and know-how" for the "purpose of design, development, manufacture, integration, assembly, service/MRO and/or the sale of avionics systems."[163] The agreement shows the key enabling technology included a significant number of documents detailing how Rockwell Collins managed quality, production output, and testing of key aerospace systems.[164] Those transfers remained subject to U.S. export controls, and Collins Aerospace obtained licenses to continue avionics-related work with CETCA and the joint venture.[165]

At some point, the parties were worried that CETCA may be listed under United States export control regulations because they executed an amendment to specifically address that situation. In December 2023, Rockwell Collins executed an amendment to the joint venture that included specifically identifying "the occurrence of … any sanction related restrictions imposed on Rockwell [Collins] or CETCA."[166] The amendment laid out a process for unwinding the joint venture in the event sanctions were imposed.

PRC authorities separately made clear that the partnership was expected to build indigenous capability. The PRC State Administration of Science, Technology and Industry for National Defense ("SASTIND") said RCCAC would introduce communications and navigation technology comparable to that used on the Boeing 787 and Airbus A350 and enable a "leapfrog improvement" in related PRC technologies.[167] CETCA later credited RCCAC with filling a domestic capability gap and establishing indigenous production and maintenance capacity.[168] By 2017, RCCAC had entered "localized mass production,"[169] and by 2018 its systems supported the C919, ARJ21, MA700, AG600, and "future models."[170]

The venture was also embedded physically and institutionally within that broader defense ecosystem. RCCAC operated at CETCA's avionics industrial base at No. 9 Baichuan Road in Chengdu, the same campus as CETC Special Mission Aircraft System Engineering Co., Ltd. ("CETC Special Aircraft"), a developer of unmanned and special mission aircraft formally included in Sichuan's "military industry system."[171] The industrial park sits immediately adjacent to the Huangtianba aviation complex, home to AVIC Chengdu Aircraft Industry Group and the Chengdu Aircraft Design and Research Institute, major centers for PRC fighter and unmanned aircraft development.[172] Collins Aerospace represented to the Select Committee that RCCAC does not work with these parties and has not provided—or contemplated providing—any information to them, as reflected in Collins Aerospace's licenses.[173] Since these facilities are physically located in China, the Select Committee was unable to independently verify this statement.

Senior personnel likewise crossed between the commercial avionics venture and CETC's defense businesses. CETCA's founding chairman, Zuo Qunsheng, had earlier participated in the development and flight testing of China's first indigenous airborne pulse Doppler fire control radar.[174] Chen Guohai later held senior leadership roles across CETCA and affiliated ventures, including RCCAC, CETC's now-shuttered joint venture with Thales, and CETC Special Aircraft. Ren Jingsong similarly served as chairman of RCCAC before becoming chairman and general manager of CETC Special Aircraft. These personnel ties further connected the commercial C919 venture to CETC's military aviation businesses.

In May 2021, CETCA increased its stake in RCCAC from 50 percent to 99 percent, effectively taking control while Collins Aerospace retained a 1 percent interest.[175] Collins Aerospace's ownership of its C919 surveillance joint venture with AVIC Leihua was similarly reduced to 1 percent. The following year, Beijing announced unspecified countermeasures against Collins Aerospace's parent Raytheon Technologies over its involvement in U.S. arms sales to Taiwan. CETCA subsequently expanded its domestic development and testing capabilities in satellite communications, RNP navigation, and multi-band RCP communications, including platforms for high-reliability equipment designed for complex operating environments.[176]

Taken together, the partnership did more than supply a communications and navigation system for a commercial airliner. It helped localize advanced avionics technology, production, and maintenance capabilities inside a CETC enterprise whose facilities, personnel, and institutional structure were closely intertwined with the PRC military aviation sector.

AUAE: Electrical Power Systems

In 2014, Hamilton Sundstrand, now part of Collins Aerospace, and AVIC Shaanxi Aero Electric Co., Ltd. ("SAEC") opened Xi'an AVIC Hamilton Sundstrand Aviation Electric Co., Ltd. ("AUAE"), a 50-50 joint venture established to develop and manufacture the C919's electrical power system. At the time, SAEC was a subsidiary of AVIC Electromechanical Systems Co., Ltd. ("AVIC EM"). Following AVIC's 2018 consolidation of its avionics and electromechanical businesses, SAEC became part of AVIC Airborne Systems Co., Ltd. ("AVIC Avionics"), which oversees a broad portfolio of civil and military airborne systems and equipment.[177]

Corporate records indicate that SAEC continues to hold 50 percent of AUAE, while the remaining 50 percent is held by Eldridge Holdings LLC, which corporate records identify as associated with Hamilton Sundstrand Holdings Inc. and Collins Aerospace.

PART II. WHEN SAFEGUARDS FAIL

The case studies above show how Western aerospace partnerships helped place technology, engineering expertise, and production capabilities inside the PRC aerospace industrial base. The next question is why U.S. national security safeguards did not prevent those relationships from forming or, once risks became clearer, bring them to an end.

In many cases, the answer lies in the commercial framing of the underlying aircraft programs. The partnerships examined by the Select Committee were generally established to support ostensibly civil platforms such as the C919. That framing allowed U.S. companies to continue supplying controlled aerospace hardware, software, technical data, and engineering support under export licenses, even where the Chinese counterparties were closely tied to the PRC defense industrial base. Over time, several of those counterparties were formally identified by the U.S. government as Military End Users, but that designation did not necessarily terminate the commercial relationship.

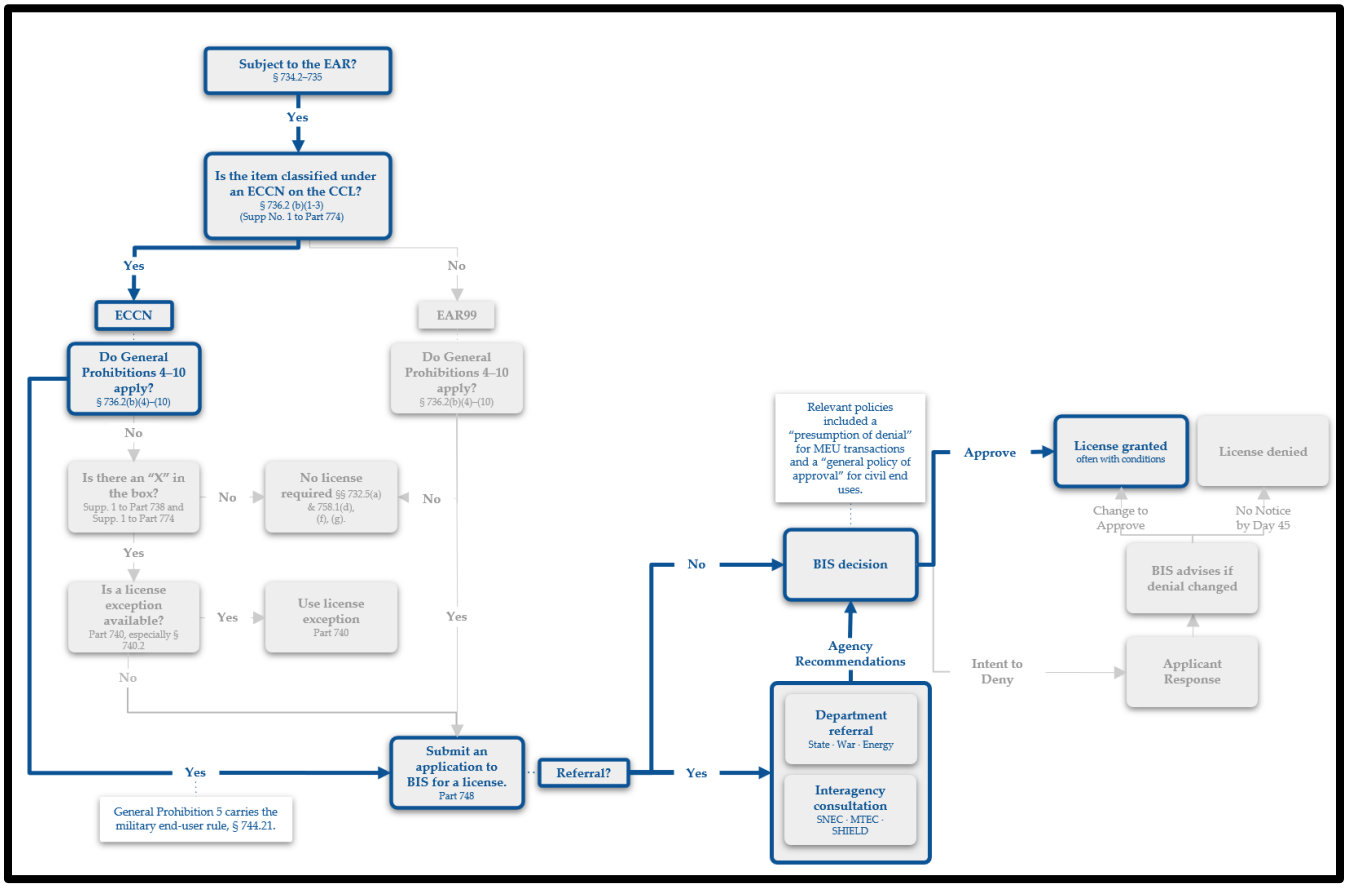
Finding 2: Honeywell Aerospace, GE Aerospace, and Collins Aerospace repeatedly sought and obtained licenses for controlled C919 and ARJ21 transfers involving PRC military end users and other military-linked entities.

As part of its investigation, the Select Committee reviewed export licenses produced by GE Aerospace, Honeywell Aerospace, and Collins Aerospace. Those records show how BIS authorized controlled aerospace hardware, software, and technology exports to PRC commercial aircraft programs even where military-linked entities were parties to the transaction. They also show how the licensing process allowed the commercial character of the C919 and ARJ21 programs to remain relevant to BIS's review despite those military ties.

In 2020, BIS acknowledged that the PRC's Military-Civil Fusion strategy made the distinction between civilian and military development increasingly difficult to maintain and expanded its MEU controls in response.[178] Yet those controls did not categorically bar covered transfers involving military end users. Instead, such transactions could still proceed through the licensing process, where the stated civil end use remained relevant to BIS's decision.[179]

As **Figure 10** shows, Honeywell Aerospace, GE Aerospace, and Collins Aerospace first had to determine whether the hardware, software, or technology sought for export was subject to the Export Administration Regulations ("EAR") and, if so, how it was classified on the Commerce Control List ("CCL") or designated EAR99. Each listed item may be assigned an Export Control Classification Number ("ECCN"), which identifies the item and the reasons for control. Most of the ECCNs in the licenses produced to the Select Committee fell within Categories 7 and 9, which cover navigation and avionics, and aerospace and propulsion, respectively.

Figure 10. Summarized Export Licensing Process for Controlled Transfers[180]

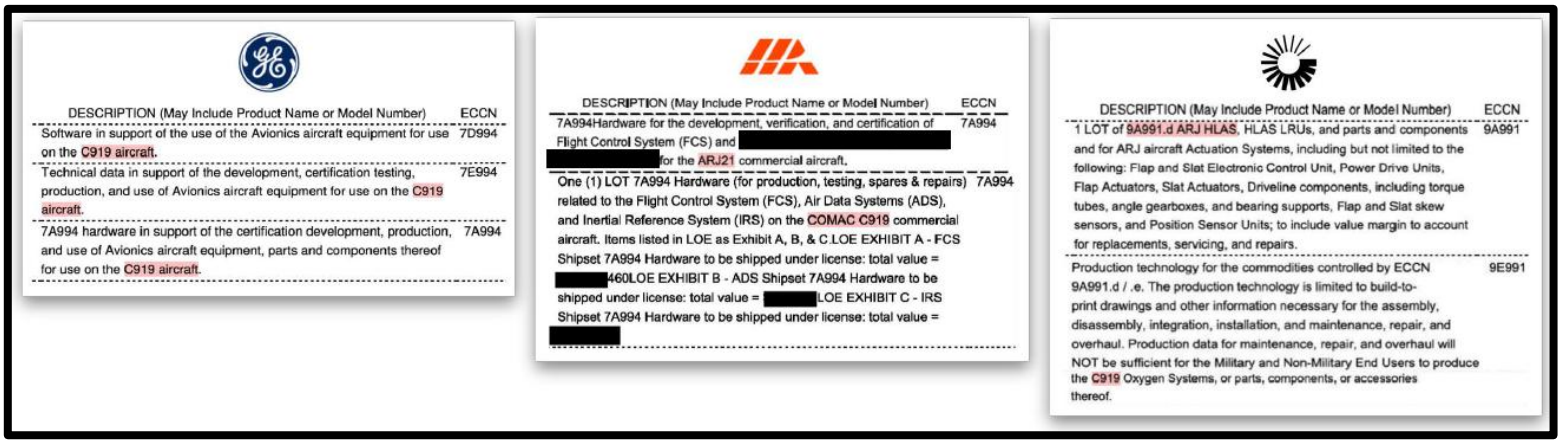


Next, the companies had to determine whether any end-use or end-user restrictions applied. General Prohibition Five was most relevant,[181] because it incorporates several separate restrictions in Part 744, including the Entity List and the military end-use and military end-user rule.[182] The two operate differently. For an Entity List party, the applicable license requirement is set by that entity's specific listing, which may cover all items subject to the EAR or a narrower set.[183] In contrast, the military end-use and military end-user rule applies only to covered items when the company knows they are destined for a prohibited military end use or military end user.[184] MEU List identifies certain such parties, but "is not […] exhaustive," so exporters "must conduct their own due diligence" to determine whether unlisted parties also qualify.[185] For example, a party may appear on DoW's 1260H Chinese Military Companies list but is absent from the MEU List.[186] However, this would still raise a "Red Flag" requiring "additional due diligence."[187] Several PRC parties named in the licenses, including the Shanghai Aircraft Design and Research Institute, FACRI, and LETRI, implicated one or both controls. Multiple transactions involved a covered item and a prohibited military end use or military end user.

Once a transaction required a license, the company had to tell BIS what it wanted to export, who would receive or use it, for what purpose, the item's intended destination, the item's proposed route, and the potential other counterparties to the transactions.[188] The Select Committee reviewed granted licenses produced by Honeywell Aerospace, GE Aerospace, and Collins Aerospace. Most involved the C919 or ARJ21, while Collins Aerospace licenses involved other AVIC programs.

Taken together, the licenses reveal two broader features of how the expanded controls operated in practice. First, the new military-end-user restrictions often converted existing commercial aerospace work into licensed activity rather than bringing that work to an end. Honeywell Aerospace and Collins Aerospace both described activities that predated the expanded controls and then sought licenses to continue those same activities once the new restrictions applied. The technical work and commercial relationships largely remained in place, while the transfers now required BIS approval and were expressly tied to the C919 or ARJ21 as the authorized civil end use. The controls changed the licensing status of the work more than the work itself. As **Figure 11** shows, the resulting licenses continued to authorize controlled avionics, flight-control systems, software, and data transfers in support of those same commercial aircraft programs.

Figure 11. License Descriptions Tying Controlled Exports to the C919 and ARJ21



DESCRIPTION (May Include Product Name or Model Number)	ECCN
Software in support of the use of the Avionics aircraft equipment for use on the C919 aircraft.	7D994
Technical data in support of the development, certification testing, production, and use of Avionics aircraft equipment for use on the C919 aircraft.	7E994
7A994 hardware in support of the certification development, production, and use of Avionics aircraft equipment, parts and components thereof for use on the C919 aircraft.	7A994

DESCRIPTION (May Include Product Name or Model Number)	ECCN
7A994Hardware for the development, verification, and certification of Flight Control System (FCS) and [redacted] for the ARJ21 commercial aircraft.	7A994
One (1) LOT 7A994 Hardware (for production, testing, spares & repairs) related to the Flight Control System (FCS), Air Data Systems (ADS), and Inertial Reference System (IRS) on the COMAC C919 commercial aircraft. Items listed in LOE as Exhibit A, B, & C.LOE EXHIBIT A - FCS Shipset 7A994 Hardware to be shipped under license: total value = [redacted]460LOE EXHIBIT B - ADS Shipset 7A994 Hardware to be shipped under license: total value = [redacted]LOE EXHIBIT C - IRS Shipset 7A994 Hardware to be shipped under license: total value = [redacted]	7A994

DESCRIPTION (May Include Product Name or Model Number)	ECCN
1 LOT of 9A991.d ARJ HLAS, HLAS LRUs, and parts and components and for ARJ aircraft Actuation Systems, including but not limited to the following: Flap and Slat Electronic Control Unit, Power Drive Units, Flap Actuators, Slat Actuators, Driveline components, including torque tubes, angle gearboxes, and bearing supports, Flap and Slat skew sensors, and Position Sensor Units; to include value margin to account for replacements, servicing, and repairs.	9A991
Production technology for the commodities controlled by ECCN 9A991.d / .e. The production technology is limited to build-to-print drawings and other information necessary for the assembly, disassembly, integration, installation, and maintenance, repair, and overhaul. Production data for maintenance, repair, and overhaul will NOT be sufficient for the Military and Non-Military End Users to produce the C919 Oxygen Systems, or parts, components, or accessories thereof.	9E991

Second, as required by BIS, parties were identified according to their role in the transaction, not necessarily according to the ownership structure behind them. Restrictions generally followed the named entity, not its ownership interests, so a separately incorporated joint venture did not automatically inherit the restrictions of a listed shareholder. A joint venture could therefore be named as the purchaser, consignee, or end user without its PRC shareholder being separately identified.

For example, one of Honeywell Aerospace's license applications identified HonFei as a non-military end user but did not separately identify FACRI, its 50-percent AVIC shareholder and a military end user, as a party to the transaction.[189] By contrast, another license named both HonFei and FACRI in a separate C919

transaction despite the same underlying 50-50 ownership structure.[190] Similarly, both GE Aerospace licenses identified Aviage as the purchaser without separately identifying AVIC CAE, which held 50 percent of Aviage.[191]

BIS later moved to close this ownership gap through its September 2025 "Affiliates Rule," which extended Entity List and Military End-User List restrictions to entities at least 50 percent owned by listed parties.[192] However, the rule was suspended two months later for one year as part of the broader U.S.-China trade negotiations then underway.[193]

Once the applicant identified the items, parties, and end use, BIS reviewed the application and decided whether to refer it for interagency review. The EAR directs BIS, "[t]o the maximum extent possible," to decide license applications "without referral […] to other agencies," although BIS may seek review from the Departments of War, State, Energy, or other agencies.[194]

Generally, BIS would make the final licensing decision under the review policies applicable to each transaction.[195] For China, transactions subject to the military end-use and MEU rule were generally reviewed with a presumption of denial.[196] For national-security-controlled items exported to the PRC, BIS separately reviewed the risk of diversion to MEUs or military end uses while maintaining a "general policy of approval" for items determined to be for "civil end users [or] for civil end uses."[197] The companies' commercial characterization of the transactions was directly relevant to the licensing analysis. By identifying the C919 or ARJ21 as the stated end use, they presented transfers involving military-linked PRC parties as support for civil aircraft programs. While BIS still considered "the appropriateness of the export […] for the stated end use," the parties involved, and diversion risks, records produced to the Select Committee show that BIS approved numerous C919 and ARJ21 licenses involving military-linked PRC parties.[198]

By the time many of these restrictions applied, however, the underlying relationships and technical work had already been in place for years. Joint ventures had been formed, engineering teams worked together, production arrangements had been established, and PRC partners had accumulated experience with major aircraft systems. Subsequent controls could restrict additional transfers, but they could not unwind capabilities, relationships, or infrastructure already created.

The purpose of the expanded MEU controls was to prevent U.S. technology from supporting the military capabilities of strategic competitors. In practice, however, the Select Committee assesses that new restrictions often changed the regulatory terms of existing commercial relationships without materially reducing their contributions to PRC military modernization and dual-use aerospace capabilities.

Finding 3: Export controls relied on company due diligence even where commercial incentives favored continuity and past enforcement actions revealed compliance weaknesses.

The process described above depended heavily on the companies themselves to identify the technology, parties, ownership relationships, and end uses relevant to each transaction. That reliance was not neutral. Honeywell Aerospace, GE Aerospace, and Collins Aerospace had substantial commercial interests in preserving long-standing PRC aerospace relationships, including joint ventures and supplier arrangements tied to the C919 and ARJ21. When new military-end-user restrictions were applied, the records reviewed by the Select Committee suggest that the companies sought licenses to continue those relationships rather than withdraw from them.

Regulations gave significant deference to the companies' own compliance judgments. The licensing process relied on them to classify controlled technology correctly, determine when a license was required, identify military-linked recipients, and prevent unauthorized transfers, even when a more restrictive judgment could limit their own business. Each of the three aerospace companies examined here has faced significant export-control enforcement actions involving failures in those same areas.

- In 2021, Honeywell International Inc. agreed to pay $13 million to resolve alleged International Traffic in Arms Regulations ("ITAR") [199] violations involving unauthorized exports and retransfers of controlled technical data to unauthorized geographies, including to the PRC. State Department charging documents described transfers of engineering drawings related to military aircraft including the F-35, B-1B, and F-22, and determined that certain transfers harmed U.S. national security. [200]

- In 2024, RTX agreed to pay $200 million to resolve 750 alleged ITAR violations. State attributed many of the most serious violations to longstanding compliance weaknesses at Rockwell Collins, including errors in determining the jurisdiction and classification of aerospace technical data and unauthorized releases to PRC recipients. The violations included technical data associated with the E-3, KC-390, and F-22, as well as years of unauthorized exports to PRC suppliers supporting military systems. [201]

- In 2026, GE Aerospace agreed to resolve 116 alleged ITAR violations. State Department charging documents described three cases of unauthorized controlled technical data exports to the PRC related to military aircraft engines for multiple DoW platforms, including the F/A-18, U-2, F-16, and F-15 aircraft. The Department

attributed the violations to deficiencies in GE's export-compliance procedures and employees' failure to follow them.[202]

The Select Committee does not cite these enforcement actions to suggest that the C919 or ARJ21 applications reviewed here were inaccurate or improperly obtained. Rather, they illustrate a broader structural concern. The licensing system relies heavily on exporters to identify and elevate national security risks in transactions they have strong commercial incentives to preserve, while offering comparatively little incentive to interpret uncertainty against their own business interests. As Finding 2 shows, those judgments can shape whether an unlisted PRC party is treated as a military end user, whether a joint-venture shareholder is separately identified, and whether longstanding technical work continues under a new license. What this history of significant ITAR violations does show is that the companies' controls are not always sound.

Finding 4: PRC-based joint ventures created a structural gap in U.S. national security review by allowing sensitive capabilities to move offshore outside the principal CFIUS framework.

These joint ventures represent a dangerous loophole for draining American technical know-how and diverting it to Chinese firms. As detailed above, many of these joint ventures involved a Western firm transferring its intellectual property and industrial capabilities while the Chinese partner would contribute cash, connections, and labor. Through this relationship, the Chinese joint venture partner is taught how to design, develop, and manufacture technology it would otherwise be unable to learn to produce due to restraints imposed on inbound investment activity by CFIUS. CFIUS would almost certainly block a Chinese state-owned firm from investing or accessing the key intellectual property of U.S. aerospace firms through mergers and acquisitions or other direct investment into the U.S. corporation. But many PRC-based joint ventures circumvent this critical national security review, evading CFIUS jurisdiction and enabling China to lure in Western aerospace companies and bulk up its aerospace industrial base free from unwanted scrutiny by U.S. regulators.

PART III. THE BACKFILL PROBLEM

U.S. restrictions do not operate in a vacuum. In a global aerospace market with multiple capable Western suppliers, excluding an American company from the PRC may simply redirect business to an allied competitor rather than deny Beijing the underlying technology or expertise. The result can be a policy that imposes real costs on the U.S. aerospace industrial base while leaving the PRC's access to Western capabilities largely intact.

Finding 5: Unilateral U.S. restrictions would disadvantage American aerospace companies without denying China access to many Western technologies when allied firms backfill the resulting business.

Aerospace companies across allied and partner nations compete in many of the same product categories as U.S. firms but operate under different export control, investment, and national security regimes. The C919 program illustrates the problem. COMAC relied not only on American suppliers, but also on European firms for critical systems and components, including propulsion, landing gear, electrical systems, and other aircraft technologies. Where allied rules diverge, U.S. restrictions can therefore shift commercial opportunities away from American firms without producing a corresponding reduction in Beijing's access to advanced aerospace capabilities.

One country plays an outsized role in advancing the PRC's dual-use aerospace capabilities: France. French aerospace companies have maintained extensive relationships with the PRC aerospace sector for nearly four decades, including with major defense enterprises across aircraft manufacturing, propulsion, software, and other critical technologies.

In August 2025, the Select Committee sought to examine those ties more closely, writing to Airbus regarding evidence that its activities in the PRC supported Beijing's military aerospace capabilities (attached as **Attachment A**). Airbus subsequently informed the Select Committee that a French blocking law restricted its ability to provide certain information responsive to congressional oversight. This bears emphasis: **French law effectively limited the Select Committee's ability to obtain information from Airbus, a Pentagon contractor, regarding its activities in the PRC**. After French authorities constrained Airbus's engagement, the Committee did not seek comparable productions from Safran or Dassault Systèmes International ("Dassault") and instead assessed the broader French aerospace sector through open-source research and interviews with market participants.

Table 2. Surveyed Partnerships

Type	French Firm	PRC Partner	Capability	Status
Tech Transfer	Airbus	XAC	A320 Wing Manuf.	Ongoing
Joint Venture	Airbus	AVIC	Aircraft Structures	Ongoing
Licensing	Dassault	CASC	Software	Ongoing
Joint Venture	Safran	SAM	Wiring Systems	Ongoing
Joint Venture	Safran	XAC	Nacelle Components	Ongoing
Co-Dev.	Safran	AECC	WZ-16 Engines	Ongoing

During the investigation, multiple market participants told the committee French companies advertise themselves to customers as being beyond the reach of U.S. restrictions. For example, Airbus advertises that it can sell satellite photos without U.S. restrictions. Similarly, Dassault advertises that it can sell to companies identified by the U.S. on the BIS Entity List because it is beyond the reach of U.S. law. The information below corroborates this account because it shows these companies building commercial relationships with entities identified as a national security threat by the United States government.

The conclusion of this review is simple: French companies often offer comparable capabilities as American firms, but with far fewer scruples. While American firms have begun taking initial steps to reduce dangerous overexposure to the Chinese market, French firms doubled down on their relationships with PRC firms, especially AVIC. Airbus leads these firms in terms of PRC engagement, but others have strengthened their ties and dependence on the Chinese market. The sections below will detail French aerospace firms' deep connections to China. However, it is important to note that French aerospace companies have a history of displacing American rivals internationally, including in China.

A WTO compliance panel found the European Union (EU), Germany, France, the United Kingdom, and Spain gave Airbus billions of dollars in subsidies.[203] The WTO panel further found European subsidies caused Airbus to displace Boeing aircraft in China, among other places.[204] This historical case shows that Airbus will displace American aerospace firms even if it goes against allied interests. Were the United States to apply unilateral restrictions on the Chinese market, Airbus and other French companies would displace American incumbents as they have previously. It is therefore important for policymakers to balance PRC aerospace restrictions while not creating an opening for French companies to backfill.

Airbus

Airbus worked with the Chinese aerospace industrial base across a multitude of capabilities. China is Airbus's largest sales market.[205] Airbus opened several sprawling facilities in China, including its first A320 FAL outside Europe in Tianjin as described below. Airbus also opened an airplane recycling facility in Chengdu,[206] an A330 finishing facility in Tianjin, it's first outside Europe,[207] and a FAL for the H135 helicopter in Qingdao.[208] Beyond these facilities, Airbus significantly invested in the Chinese aerospace technical ecosystem. Airbus opened a research and development center in Suzhou,[209] and an innovation center in Shenzhen to "[access] a highly advanced digital innovation ecosystem."[210]

While other aerospace companies pulled back from the Chinese market, Airbus tripled down by adding a second FAL with construction beginning in 2023. The resulting facility is a sprawling complex that significantly empowers the Chinese aerospace industrial base. **Figure 12**, a satellite photo from Vantor, shows the facility's scale.

Figure 12. Satellite Image of Airbus's Facilities



Airbus' relationship with AVIC has grown beyond joint production and into direct equity ownership. For roughly two decades, Airbus was the single largest international shareholder of AviChina Industry and Technology Company Limited, AVIC's Hong Kong listed arm, holding a 5 percent stake valued at approximately $140 million.[211] Airbus's China CEO, George Xu, concurrently served as a non-executive director of AviChina and a member of its Development and Strategy Committee.[212] Airbus was therefore not merely a customer and manufacturing partner of AVIC but a financial stakeholder and key decision maker in the listed vehicle of China's principal military-aviation conglomerate. Airbus divested the entirety of this stake in April 2025, subsequently confirming that it "does not have any equity investments in AVIC."[213] The divestment, however, terminated only the shareholding; Airbus's operational partnerships with AVIC including joint ventures, wing production, and component supply continue.

Beyond equity ownership and industrial investment, Airbus actively encouraged its established Western suppliers to relocate manufacturing capability into China. Airbus's own China CEO has been explicit on the point, stating that the company encourages its traditional European and American suppliers to come to China, invest, build factories, and cooperate with the Chinese aviation manufacturers, and that Airbus has been actively encouraging its longstanding suppliers to do so.[214] For example, the French aerostructures manufacturer Figeac Aero, which counts Airbus among its principal customers, illustrates the pattern. Its Chinese joint venture, Nanshan Figeac Aero Industry (NFAI), formed with Shandong Nanshan Aluminum, established a Chinese production line for complex monobloc aluminum aerospace parts, investing in advanced machining centers and securing the AS9100 and EN9100 aerospace quality certifications with the technical support of its Chinese partner.[215] In 2024, NFAI was accredited as an

approved supplier by AVIC SAC Commercial Aircraft, a subsidiary of AVIC, positioning the French-founded venture directly within AVIC's supply chain and clearing its path to bid on Chinese aerospace programs.[216] As a result, Airbus directly built French aerospace manufacturing capabilities into China's aerospace military industrial base.

To further entrench itself in the PRC ecosystem, Airbus enmeshed itself directly with the CCP. George Xu (Xu Gang), appointed CEO of Airbus China in January 2018, spent more than two decades working within the Chinese government and Communist Party apparatus before assuming leadership of Airbus's largest national market.[217] Xu began his career in 1995 at the Tianjin Economic and Technology Development Area Administrative Committee and rose to become the Director of the Investment Promotion Bureau of the Tianjin Free Trade Zone.[218] This was the same government agency that competed to bring the Airbus A320 final assembly line to Tianjin over rival cities including Shanghai, Xi'an, and Zhuhai.[219] In that capacity, Xu directly shaped the project, participating in the site selection and the negotiation of the Airbus joint venture.[220] He held senior government and Airbus-related positions concurrently: from 2011 to 2014 he served simultaneously as Chairman of the Board of the Airbus Tianjin Final Assembly Line and as Vice President of the Tianjin Free Trade Zone Administrative Committee.[221] Subsequently, Airbus settled bribery allegations in China that overlap with that timeframe raising questions about this relationship.[222]

From 2014 to 2017, Xu worked full-time in Party organizations, serving as Party Secretary of the Tianjin Municipal Committee of the Communist Youth League and as Standing Committee Member of the Communist Youth League of China Central Committee, alongside a seat on the Standing Committee of the Tianjin Municipal Peoples's Congress, before moving directly into the CEO role at Airbus China.[223] Reflecting on the transition, Xu characterized his earlier government work as oriented toward supporting Airbus and ensuring the project succeeded as a "win-win."[224] That Xu heads Airbus's operations in its largest market and came directly from senior Party and municipal government posts underscores the extent to which Airbus's commercial position in China has been embedded within the Chinese party-state.

Finally, Airbus contributed to the Chinese ecosystem beyond aircraft. France and China have cooperated in space for decades, most visibly through the China-France Oceanography Satellite (CFOSAT).[225] This partnership was launched jointly by the French space agency Centre National d'Études Spatiales (CNES) and the China National Space Administration in 2018 to monitor the ocean surface, winds, and waves, with the resulting data shared bilaterally between French and Chinese mission centers.[226] While the mission is described as civil and scientific, the data exchanges carry recognized dual-use relevance for maritime and naval operations-- a relevance signaled by the French Navy's hydrographic service (SHOM) being among its partners.[227]

That relevance is not abstract. Sea weather remains a decisive constraint on amphibious operations in the Taiwan Strait.[228] Seasonal monsoons and typhoon patterns drive wave heights that dictate naval movements, narrowing any cross-strait amphibious assault by China to two viable windows a year.[229] As a result, understanding and predicting surface and wave patterns present crucial operational information to the PLA as part of any future cross-strait invasion.[230] The DoW assesses that the PLA continues to refine an amphibious invasion among its options to compel unification with Taiwan by force, underscoring the dual-use application of this bilateral exchange of oceanographic data.[231] Airbus Defense and Space is among CNES's principal industrial partners, building satellites and Earth-observation systems on which French space capability rests, and thus sits at the center of an institutional ecosystem that simultaneously pursues geospatial-data cooperation with China.[232] The connection here is an indication that the same blurring of civil cooperation and strategic exposure running through Airbus's aviation partnerships also appears in the space domain.

Dassault Systèmes International

Dassault illustrates the same allied-policy gap at the software layer. The French company's industrial design and manufacturing tools are widely used to design, simulate, and manage complex aerospace systems. Both Airbus and Dassault were founding members of the France-China business council, launched during President Emmanuel Macron's January 2018 state visit alongside Chinse partners including COMAC and Huawei.[233] Dassault spun off from the aircraft manufacturer Dassault Aviation in 1981 but is still a part of the broader Dassault group and is among the world's leading industrial software companies. Its flagship 3DEXPERIENCE platform and constituent applications, including the CATIA design suite, SIMULA simulation tools, and product-lifecycle management software, are used across the aerospace, defense, and advanced manufacturing sectors to design, simulate, and manage the production of complex engineered systems. The company has operated in China since 1986 and works with more than 100 Chinese partners.[234]

In 2018, during President Emmanuel Macron's state visit to China, Dassault signed a strategic cooperation agreement with CASC, a U.S. government listed entity, to deploy its 3DEXPERIENCE platform and strengthen CASC's digital manufacturing capabilities,[235] which was framed as supporting China's "Made in China 2025" strategy.[236] CASC is the principal contractor for China's space program and, at the same time, a core developer of the PLA's strategic and tactical missile systems.[237]

Dassault subsequently expanded its PRC relationships. Chinese reporting identified CASC-controlled Beijing Shenzhou Aerospace Software Technology Co., Ltd. ("Shenzhou Aerospace") as the vehicle for integrating Dassault technology into the PRC aerospace industrial base.[238] Shenzhou Aerospace describes its software as serving aerospace, defense, government, Party, and military customers. It also holds qualifications for military and classified systems.

In December 2025, Shenzhou Aerospace and Dassault established Aerospace Xingyuan Digital Intelligence Technology Co., Ltd. to focus on software and information technology services.[239]

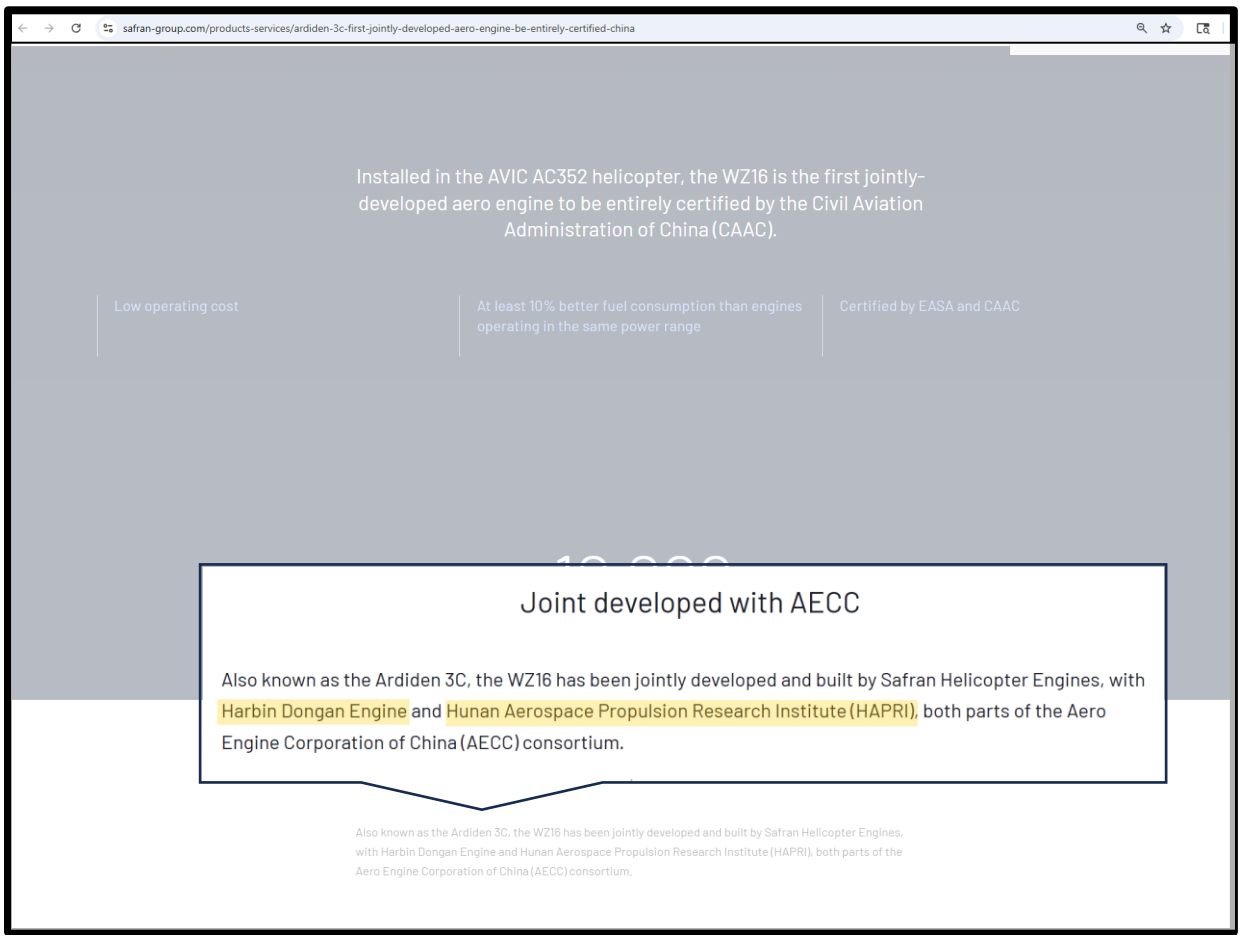
The 2018 cooperation agreement with CASC was not an abstract memorandum. From the outset it was structured around a joint venture with a specific CASC subsidiary whose business is explicitly military. Chinese reporting on the agreement identified the vehicle for cooperation as Beijing Shenzou Aerospace Software Technology Co., Ltd., a state-owned software enterprise controlled by CASC, which would form a joint venture with Dassault to integrate the 3DEXPERIENCE platform into Chinese aerospace informatization and "further enhance manufacturing capabilities."[240] CASC's chief engineer, who also chairs Beijing Shenzou, described the objective plainly: to apply Dassault's technology in service of "China Aerospace Manufacturing 2025."[241]

Dassault's direct partnerships with listed Chinese entities raise questions about its export compliance. Dassault completed a series of United States-based acquisitions to supplement its software offering, including Exa Corporation.[242] Exa Corporation provided software to assist in simulating fluid dynamics and according to former Exa CEO Stephen Remondi, Exa can "solve the most challenging fluids problems faster and more accurately than traditional methods for aerodynamics, aeroacoustics, thermal management and other fluids-related applications."[243] These statements indicate the software would likely be integrated into Dassault's offering to CASC. Beyond Exa, Dassault acquired multiple other American software providers including IQMS.[244] Dassault's integration of an American aerodynamics software provider into its offering while simultaneously offering aerodynamics software to listed Chinese users raises questions about Dassault's export compliance.

Safran

Finally, Safran provides another example of the same allied policy gap as a Tier 1 supplier. Safran's website proudly boasts its influence and deep roots in all segments of China's major aviation programs over 50 plus years.[245] Safran systematically engaged the Chinese aerospace industrial base across multiple capabilities including joint ventures for electrical wiring interconnection systems with BIS-listed MEUs,[246] thrust reverser door technology with a different Chinese defense contractor,[247] and co-developing helicopter engine technology with other Chinese military-linked companies.[248] For example, the screenshot below from Safran's website shows it developed a helicopter engine with two entities tied to the PLA.[249]

Figure 13. WZ16 Collaboration Website



The Harbin Dongan Engine Company, a subsidiary of the AECC, has been listed as a MEU by BIS since 2020.[250] The Hunan Aerospace Propulsion Research Institute (HAPRI) also engages in a variety of military research and development. Research shows that HAPRI goes by multiple names including the 608 Institute.[251] Other research also shows that HAPRI has a history of supplying test benches to the PLA.[252] HAPRI also developed the first turbofan engine up to Chinese military standards.[253]

In another example, Safran established a joint venture with the Shanghai Aircraft Manufacturing Corporation ("SAM") in 2012 to manufacture EWIS, an electrical wiring connection system, for the Chinese C919 commercial aircraft.[254] BIS listed SAM as a military end-user in December 2020.[255] The EWIS systems can then be applied to different aircraft sections and processes.[256] While the C919 is a commercial aircraft, Safran's partner in this joint venture, SAM has been involved in the manufacturing and repair of more than 3,400 aircraft for the PLAAF and the PLAN.[257] In January 2025, the U.S. DoW identified SAM as a "Chinese military company" to highlight its role in supporting the modernization goals of the PLA.[258]

Additionally, Safran established a joint venture with XAC in 2011 to manufacture engine nacelle components.[259] XAC develops and manufactures military aircraft for the PLA.[260] This includes the Y-20 strategic transport aircraft, the H-6 bomber, and the JH-7 fighter bomber.[261] XAC has been identified by the Pentagon as a Chinese military company.[262] By 2016, the venture had assembled 8,000 thrush reverse doors for CFM56 engines.[263] The military relevance of this technology is direct. The American C-17, a large aircraft comparable to the Y-20, uses reversers to support operations from short runways and austere airfields.[264] Safran's joint venture with XAC provides the opportunity to develop reverse thruster technology making the Y-20 even closer to the capabilities of the C-17. The commercial relationship therefore placed advanced aerospace manufacturing involving thrust reverser components within the industrial enterprise that also produces PLA aircraft.

Safran further invested in the Chinese aerospace talent pipeline by becoming the first industrial partner of the École Centrale de Pékin at Beihang University, supporting the training of Chinese engineers.[265] Beihang has been on the U.S. Entity List since 2001 and is one of the "Seven Sons of National Defense," a group of universities closely tied to the PRC defense research system.[266] This systemic engagement across a multitude of Chinese aerospace capabilities highlights French systemic engagement and how it fuels China's military rise.

PART IV. POLICY SOLUTIONS

Policy Recommendation 1: Force Defense Contractors to Pick a Side

The competition between the United States and the PRC will continue into the foreseeable future. United States and allied companies receiving taxpayer funding should not be able to play both sides of this competition. Allied aerospace companies such as Airbus continue to receive U.S. taxpayer funding while simultaneously investing in both the U.S. and PRC aerospace industrial bases. The United States should not allocate taxpayer dollars to companies that build adversary military capabilities that can be turned against the United States and its allies.

Policy Recommendation 2: Restrict Investments in China's Aerospace Sector, and Expect Allies and Partners to Do the Same

The Treasury Department should restrict outbound investment into China's aerospace sector under its Outbound Investment Security Program, and Congress should codify this prohibition by amending it into the Comprehensive Outbound Investment National Security Act of 2025 (COINS Act). The COINS Act framework prohibits investment in certain sectors of the Chinese economy due to their dual-use capabilities. As shown in this investigation, the Chinese aerospace sector deeply intertwines both civil and military capabilities and remains at the heart of China's Military-Civil Fusion strategy. Simultaneously, the executive branch

should pressure allies to act in lockstep and avoid undermining shared security interests.

Policy Recommendation 3: The Federal Aviation Administration Should Not Certify Aircraft Manufactured in China

Allowing Chinese manufactured aircraft to fly in the United States impacts two key areas of U.S. government policy. First, it impacts the safety of air travel. As described above, China's aerospace industry remains completely intertwined with its military apparatus. As a result, China withholds critical aircraft safety information on "national security" grounds. For example, when a China Eastern Airlines Boeing aircraft crashed in China, the Chinese government refused to release the report required under China's international air safety obligations based on "national security and social stability."[267] Certifying aircraft manufactured in this environment that does not share safety information endangers American passengers. Second, certifying aircraft manufactured in China rewards the lavish subsidies China gave COMAC and AVIC.

Policy Recommendation 4: Require Defense and Aerospace Contractors to Disclose Ties to Chinese Military-Designated Entities

China's Military-Civil Fusion strategy deliberately erases the line between its commercial and defense industries, and Western aerospace companies are embedded in both. A single Chinese state-owned enterprise builds wings for Western commercial airliners while simultaneously developing PLA strategic bombers and military transport aircraft. Western firms hold joint ventures, technology transfer agreements, and equity stakes in Chinese enterprises the U.S. government has designated as contributors to China's military modernization and many of those same firms hold contracts with the DoW. While existing law requires contractors to disclose certain supply chain related risks, the DoW has no requirement that contractors disclose their Chinese investments, co-development relationships with PRC military contractors, or other relationships that transfer knowledge to the PRC. Congress should pass the Aerospace Transparency Act (H.R.11047), requiring aerospace contractors doing business with DoW to disclose their relationships with U.S.-designated Chinese military companies, giving the Department the visibility it needs to assess and act on these entanglements.

Policy Recommendation 5: Toughen Export Control Licensing and Enforcement for Aerospace Technology Exports to China

Aerospace companies transferring controlled technologies to the PRC aerospace industrial base have not been required to disclose the full beneficial ownership of JV partners – even when Chinese military companies hold equity. Significant ITAR violations have been answered with penalties that do not change behavior, much of which the company pays itself to remediate its compliance practices. The State and Commerce Departments should fundamentally reapproach how licensing for aerospace technologies is handled, reducing exports to adversaries generally, requiring full beneficial ownership transparency for all

interested parties, denying dual-use exports or exports accessible by Chinese military companies, and enforcing violations with genuinely deterrent penalties.

Policy Recommendation 6: Direct the Intelligence Community to Assess the National Security Threat Posed by Commercial Geospatial AI Tools

China's Military-Civil Fusion strategy extends beyond hardware, and Chinese AI firms are now providing adversaries with targeting-grade intelligence derived from commercially available satellite imagery. During the recent conflict involving Iran, Chinese AI firm MizarVision publicly published AI-enhanced analysis of U.S. military positions on open platforms in near real time, and intelligence officials assessed that Iran actively exploited this imagery to target American assets.[268] AI-enabled geospatial analysis tools that once required state-level resources are now broadly accessible through commercial software, hosted cloud services, and off-the-shelf platforms. The U.S. currently has no publicly-available comprehensive picture of what these tools can do or how adversaries are using them. Congress should pass the Geospatial Intelligence Transparency and Security Act (H.R.11048), directing the NGA to assess the full landscape of commercial geospatial AI capabilities, identify those presenting the greatest national security concern, and transmit the findings to the Departments of Commerce and State to inform export control rulemaking and international negotiations.

Policy Recommendation 7: Subject Acquisition of American Aerospace Companies by French Companies to Heightened Scrutiny and a Presumption of Denial Until They Unwind Ties to China's Civil-Military Ecosystem

As discussed above, French aerospace companies operate under different rules than American firms. French firms maintain much stronger ties to the Chinese aerospace industrial base than American companies. Despite these different rules, French aerospace companies have been able to make acquisitions of U.S. companies as described above with Dassault and Safran's acquisition of Collins Aerospace's flight controls unit.[269] When combined with the French blocking statute that prohibits effective oversight, this backdoor allows French companies to buy American capabilities and sell them to Chinese entities designated by the U.S. government for national security-related concerns. Were U.S. regulatory agencies to investigate, the French blocking statute would prohibit effective oversight. For example, during interactions with Airbus, Airbus told the Select Committee that the U.S. Department of Justice could not obtain documents from the company and instead had to rely solely on interviews as part of its criminal investigation. Since French companies also advertise themselves as beyond United States restrictions, CFIUS must apply stricter scrutiny to French acquisitions of key American technology until France unwinds its close integration with the Chinese industrial base.

[1] Barton Gellman, U.S. and China Nearly Came to Blows in '96, Wash. Post (June 20, 1998), https://www.washingtonpost.com/archive/politics/1998/06/21/us-and-china-nearly-came-to-blows-in-96/926d105f-1fd8-404c-9995-90984f86a613/.
[2] *Id.*
[3] *Id.*
[4] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 4 (2005), https://nuke.fas.org/guide/china/dod-2005.pdf.
[5] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 34 (2010), https://www.globalsecurity.org/military/library/report/2010/2010-prc-military-power.pdf.
[6] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 24 (2011), https://nsarchive.gwu.edu/document/16585-united-states-department-defense-military-and.
[7] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 6 (2012), https://maps.lib.utexas.edu/maps/middle_east_and_asia/military_and_security_developments_involving_the_peoples_republic_of_china-2012.pdf; Annual Report to Congress: Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 19 (2015), https://digital.library.unt.edu/ark:/67531/metadc949813/m2/1/high_res_d/2015_China_Military_Power_Report.pdf.
[8] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 50 (2020), https://media.defense.gov/2020/Sep/01/2002488689/-1/-1/1/2020-DOD-CHINA-MILITARY-POWER-REPORT-FINAL.PDF.
[9] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 50 (2020), https://media.defense.gov/2020/Sep/01/2002488689/-1/-1/1/2020-DOD-CHINA-MILITARY-POWER-REPORT-FINAL.PDF.
[10] Military and Security Developments Involving the People's Republic of China, U.S. Dep't of Def., at 60 (2024), https://media.defense.gov/2024/Dec/18/2003615520/-1/-1/0/MILITARY-AND-SECURITY-DEVELOPMENTS-INVOLVING-THE-PEOPLES-REPUBLIC-OF-CHINA-2024.PDF.
[11] See, e.g., Phillip C. Saunders & Joshua K. Wiseman, Buy, Build, or Steal: China's Quest for Advanced Military Aviation Technologies, Nat'l Def. Univ. Press (2011); Roger Cliff, Chad J.R. Ohlandt, & David Yang, Ready for Takeoff: China's Advancing Aerospace Industry, RAND (2011); U.S. Gov't Accountability Off., GAO/NSIAD-97-4, Export Controls: Sensitive Machine Tool Exports to China 4–6 (1996); Off. Of the U.S. Trade Rep., Findings of the Investigation into China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation Under Section 301 of the Trade Act of 1974 (Mar. 22, 2018).
[12] Boeing, E-7 AEW&C, https://www.boeing.com/defense/patrol-early-warning-and-battle-management/e-7-aewc.
[13] William J. Clinton, Remarks on China (Oct. 24, 1997), https://perma.cc/3LGM-GE65; William J. Clinton, *Remarks on Foreign Policy* (Apr. 7, 1999), https://perma.cc/9QV4-WXFX; The National Security Strategy of the United States of America, The White House (Sept. 2002), https://perma.cc/2DWY-RFMP; George W. Bush, Remarks at Tsinghua University (Feb. 22, 2002), https://perma.cc/VF4P-SAZ5; Barack Obama, Remarks at Town Hall Meeting with Future Chinese Leaders (Nov. 16, 2009), https://perma.cc/H4WM-53NV; Barack Obama, Remarks at the U.S.- China Strategic and Economic Dialogue (July 27, 2009), https://perma.cc/ZL6C-ABG6; U.S.-China Joint Statement, The White House (Nov. 17, 2009), https://perma.cc/R47U-WKZ7.
[14] Zheng Bijian, China's "Peaceful Rise" to Great-Power Status, 84 Foreign Affs. 18 at 18–24 (2005).
[15] Erik R. Quam, CNP Part II: Seven National Development Strategies, Jamestown (Sep. 26, 2025), https://jamestown.org/comprehensive-national-power-part-2-seven-national-development-strategies/.
[16] Huang Xingjie [黄星杰], Xi Jinping Attends Plenary Meeting of PLA Delegation [习近平出席解放军代表团全体会议], Xinhua [新华社] (Mar. 12, 2015), https://perma.cc/L4HW-PLYZ. For more background on MCF, *see* U.S. Dep't of State, Military-Civil Fusion and the People's Republic of China (May 2020); Alex Stone & Peter Wood, China's Military-Civil Fusion Strategy: A View from Chinese Strategists, China Aerospace Studies Institute at 88 (2020), https://perma.cc/T6GA-PZ7V; Erik R. Quam, CNP Part II: Seven National Development Strategies, Jamestown (Sep. 26, 2025), https://jamestown.org/comprehensive-national-power-part-2-seven-national-development-strategies/.
[17] Gao Qiang et al., Codenamed "Soaring-2011" – A record of Loading and Unloading Drills by the Shenyang Military Region's Aviation Emergency Transport Combat Units, Military Weekly 9 (July 22, 2011), https://web.archive.org/web/20250914123906/https://zqb.cyol.com/html/2011-07/22/nw.D110000zgqnb_20110722_2-09.htm.
[18] COMAC Participates in the 16th Beijing Aviation Expo [中国商飞参加第十六届北京航展], COMAC News [中国商飞报] (Sept. 16, 2015), https://perma.cc/KGV3-6HJ7; Sijia Jiang & Minnie Chan, Plan in the Wings to Convert Chinese Passenger Jets for Military missions, Analysts Say, S. China Morning Post (Sept. 20, 2015), https://perma.cc/LQ6W-KKAH.
[19] Xi Jinping Meets with Representatives of the C919 Large Passenger Aircraft Project Team and Visits Exhibition of Project Achievements [习近平会见 C919 大型客机项目团队代表并参观项目成果展览], Ministry of National Defense of the People's Republic of China [中华人民共和国国防部] (Sept. 30, 2022), https://perma.cc/5XDN-WTPN.
[20] United States Strategic Approach to the People's Republic of China, White House (May 2020), https://perma.cc/SJ3D-DVUQ; Commerce Department Will Publish the First Military End User List Naming More Than 100 Chinese and Russian Companies, Bureau of Industry & Security (Dec. 21, 2020), https://perma.cc/Y8VC-3WWL; Entities Identified as Chinese Military Companies Operation in the United States in Accordance with

Section 1260H of the William M. ("Mac") Thornberry National Defense Authorization Act for Fiscal Year 2021, U.S. Dep't of Def. (Jan. 31, 2024), https://perma.cc/WX9U-VGJ6.

[21] *See*, e.g., Eugene Gerden, Avionic in China: C919 Development and Future Growth, Avionics Int'l (Feb. 2019), https://interactive.aviationtoday.com/avionics-in-china-c919-development-and-future-growth/; Courtney Howard, Common Technologies for Manned and Unmanned Aircraft, Military Aerospace Electronics (Feb. 8, 2016), https://www.militaryaerospace.com/uncrewed/article/16709050/common-technologies-for-manned-and-unmanned-aircraft; Military Innovation and Savings: Go Commercial, Breaking Defense(Mar. 18, 2024), https://breakingdefense.com/2024/03/military-innovation-and-savings-go-commercial/.

[22] P-8 Poseidon, Boeing, https://www.boeing.com/defense/patrol-early-warning-and-battle-management/p-8-poseidon; Gillian Rich, Commericial Derivatives: Passenger Aircraft Finding New Life in Military Operations, Janes (Aug. 22, 2022), https://www.janes.com/osint-insights/defence-news/air/commercial-derivatives-passenger-aircraft-finding-new-life-in-military-operations.

[23] China and Europe Jointly Manufacture the Z-15 Medium [中欧联合制造直 15 中型直升机], China Daily (Mar. 15, 2006), https://web.archive.org/web/20250711161400/https://www.chinadaily.com.cn/jjzg/2006-03/15/content_540528.htm; Terry Spruce, Eurocopter Becomes Airbus Helicopters, Corporate Jet Investor (Jan. 9, 2014) https://www.cororatejetinvestor.com/news/eurocopter-becomes-airbus-helicopters-555/; Press Release, Eurocopter receives the First Airframe Structure for the EC175 Prototype from Chinese Harbin Aviation Industry Co., reproduced in Airframer (Nov. 17, 2008), https://www.airframer.com/news/release/3405.

[24] *See* J.J. Long, Thomas Corbet & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute, at 12-13, 79-80 (Jan. 2024), https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf; Aerospace Online [航空产业网], Harbin Aircraft Industry Group Co., Ltd. Has a New Supplier: Dalian Otto Automation Equipment Co., Ltd. [哈尔滨飞机工业集团有限责任公司有了新供应商：大连奥托自动化设备有限公司] (Dec. 10, 2024), https://web.archive.org/web/20250711155752/https://www.chinaerospace.com/article/show/ef80094498a39725b12708b6f1d81f34.

[25] Press Release, Airbus, Airbus Helicopters and China's GDAT Sign for 50 H160 Helicopters (Apr. 7, 2023), https://www.airbus.com/en/newsroom/press-releases/2023-04-airbus-helicopters-and-chinas-gdat-sign-for-50-h160-helicopters; Mark Huber, Airbus Sells 50 H160 Helicopters to China's GDAT, Aviation Int'l News (Apr. 7, 2023), https://www.ainonline.com/aviation-news/business-aviation/2023-04-07/airbus-sells-50-h160-helicopters-chinas-gdat; H160 Missions, Airbus, https://www.airbus.com/en/products-services/helicopters/civil-helicopters/h160/h160-missions.

[26] Airbus Opens Second A320 Family Final Assembly Line in China, Airbus (Oct. 22, 2025), https://www.airbus.com/en/newsroom/press-releases/2025-10-airbus-opens-second-a320-family-final-assembly-line-in-china.

[27] Song Rui [宋瑞], A Two-Way Journey Aboard Airbus [一场搭乘"空中客车"的"双向奔赴"], REFERENCE NEWS [参考消息], Apr. 25, 2024, at 9, reprinted in JIANGSU NEWS NETWORK [中国江苏网] (Apr. 25, 2024),https://web.archive.org/web/20261008192213/https://news.jschina.com.cn/scroll/szyw/202404/t20240425_3397463.shtml ; see also Tianjin Daily, A Fortune 500 Company's Project to Provide Localized Support Services for the Airbus A320 Final Assembly Line Has Been Established in the Tianjin Port Free Trade Zone, People's Daily Online (Dec. 19, 2022), https://web.archive.org/web/20260915161628/https://tj.people.com.cn/n2/2022/1219/c375366-40236501.html.

[28] Aviation Industry Corporation of China is Established, Aviation Industry Corporation of China, Ltd. [中国航空工业集团有限公司], State-Owned Assets Supervision & Administration Commission of the State Council [国务院国有资产监督管理委员会] (Nov. 6, 2008), https://en.sasac.gov.cn/2020/11/06/c_2757.htm.

[29] J.J. Long, Thomas Corbett, & Dan Shats, Organization and Structure of the Aviation industry Corporation of China (AVIC), China Aerospace Studies Inst.at 15 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.

[30] J.J. Long, Thomas Corbett, & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Inst. at 12 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf; J-20 (FAGIN) Chinese Stealth Air Superiority Fighter, U.S. Army, https://odin.t2com.army.mil/WEG/List/ORIGIN_china--people-s-republic-of-d6ee02&DOM_aircraft-42b8bd.

[31] Aviation Industry Corporation of China [中国航空工业集团有限公司], Together with Us: Social Responsibility Report 2014(2015), https://web.archive.org/web/20230119230125/https://en.avic.com/upload/resources/file/2021/08/17/49931.pdf; Aviation Industry Corporation of China [中国航空工业集团有限公司], Social Responsibility Report 2017 (2018), https://web.archive.org/web/20221115033746/https://en.avic.com/upload/resources/file/2021/08/17/49929.pdf; Aviation Industry Holds First Military-Civil Fusion Development Work Conference [航空工业召开首次军民融合发展工作会], China Aviation News [中国航空报] (May 29, 2018), https://web.archive.org/web/20230119212506/https://www.sohu.com/a/233248541_115926.

[32] *Id.*, Shouldering the Mission and Responsibility of Building a Strong Aviation Nation Through High-Quality Development [以高质量发展扛牢建设航空强国的使命担当] Party Leadership Group of the Communist Party of China at China Aviation Industry Group Co., Ltd. [中共中国航空工业集团有限公司党组], (Sept. 17, 2026), State-Owned Assets Supervision and Administration Commission of the State Council (SASAC), https://web.archive.org/web/20261008193536/https://wap.sasac.gov.cn/n2588025/n2641611/c35943115/content.html.
[33] Non-SDN Chinese Military-Industrial Complex Companies List, U.S. Dept. of Treasury (Jun. 16, 2021) https://ofac.treasury.gov/recent-actions/20210616.
[34] Company Profile, Commercial Aircraft Corporation of China, Ltd. [中国商用飞机有限责任公司], https://english.comac.cc/aboutus/introduction/; Chairman's Oration, Commercial Aircraft Corporation of China, Ltd. [中国商用飞机有限责任公司], https://english.comac.cc/aboutus/Oration/; Garden Within a Garden: Featured Industrial Park [园中之园—特色园区], AVIC Civil Aviation Electronics Co., Ltd. [中航民用航空电子有限公司] , https://web.archive.org/web/20220124174909/http:/www.aviccae.com/info.asp?base_id=4; Huang Jin, First China-developed large passenger jet C919 rolls off line, https://en.people.cn/n/2015/1102/c90000-8970189.html; COMAC, COMAC, https://english.comac.cc/.
[35] Development History [发展历程], Shanghai Aircraft Design and Research Institute [上海飞机设计研究院], https://perma.cc/HX64-465Z; China's COMAC Rebrands Regional Jet to C909 in Marketing Push, Reuters (November 11, 2024), https://www.reuters.com/business/aerospace-defense/old-friend-new-look-chinas-comac-renames-regional-jet-c909-marketing-push-2024-11-12/.
[36] Scott Kennedy, China's COMAC: An Aerospace Minor Leaguer, CSIS Blog (Dec. 7, 2020), https://www.csis.org/blogs/trustee-china-hand/chinas-comac-aerospace-minor-leaguer.
[37] *Id.*
[38] Tu Chenxin, Expert: Comfortable, Fuel-Efficient, and Quiet C919 More Suitable Than Y-20 for Conversion into Special-Mission Military Aircraft [专家：舒适省油安静 C919 比运 20 适合改装特种军机], Qianjiang Evening News [钱江晚报] (Sept. 23, 2014), https://perma.cc/6NCM-S372.
[39] Wang Shengkai [王晟锴] et al., How do the China Aviation Manufacturing Industry Catchup in Technological Innovation under the Strategic Background of Civil-Military Inosculation [军民融合战略背景下中国航空制造业如何进行技术创新追赶: 基于全球创新网络视角], Science & Technology Progress and Policy [科技进步与对策] (2020), https://perma.cc/NGH7-RCG7.
[40] National Development & Reform Commission of the People's Republic of China [中华人民共和国国家发展和改革委员会], *Review of Aviation Industry Development During the 12th Five-Year Plan* ["十二五"期间航空产业发展回顾] (Aug. 2, 2017), https://www.ndrc.gov.cn/xwdt/gdzt/xyqqd/201708/t20170802_1197819.html.
[41] Xi Jinping Meets with Representatives of the C919 Large Passenger Aircraft Project Team and Visits Exhibition of Project Achievements [习近平会见 C919 大型客机项目团队代表并参观项目成果展览], Ministry of National Defense of the People's Republic of China [中华人民共和国国防部] (Sept. 30, 2022), https://perma.cc/5XDN-WTPN.
[42] Sijia Jiang & Minnie Chan, Plan in the Wings to Convert Chinese Passenger Jets for Military Missions, Analysts Say, S. China Morning Post (Sept. 20, 2015), https://perma.cc/LQ6W-KKAH.
[43] Xi Jinping Meets with Representatives of the C919 Large Passenger Aircraft Project Team and Visits Exhibition of Project Achievements [习近平会见 C919 大型客机项目团队代表并参观项目成果展览], Ministry of National Defense of the People's Republic of China [中华人民共和国国防部] (Sept. 30, 2022), https://perma.cc/5XDN-WTPN.
[44] Group Profile [集团简介], Aero Engine Corporation of China [中国航空发动机集团有限公司], https://www.aecc.cn/aecc/jtgk/jtjj/index.html.
[45] Group Profile [集团简介], China Aerospace Science and Technology Corporation [中国航天科技集团有限公司], https://www.spacechina.com/n25/n142/index.html; Company Profile [公司简介], China Aerospace Science and Industry Corporation [中国航天科工集团有限公司],https://www.casic.com.cn/; China Electronics Technology Nanhu Research Institute Recruiting Talent [中国电子科技南湖研究院诚聘英才], China Electronics Technology Group Corporation [中国电子科技集团有限公司], https://22.cetc.com.cn/zgdk/1593022/1592495/1663652/index.html; Group Profile [集团简介], China Electronics Corporation [中国电子信息产业集团有限公司], https://www.cec.com.cn/集团简介.
[46] J.J. Long, Thomas Corbett & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf; Group Profile [集团简介], Aero Engine Corporation of China [中国航空发动机集团有限公司], , https://www.aecc.cn/aecc/jtgk/jtjj/index.html; Company Profile [公司简介], Commercial Aircraft Corporation of China, Ltd. [中国商用飞机有限责任公司], , https://www.comac.cc/gywm/gsjj/; Group Profile [集团简介], China Aerospace Science and Technology Corporation [中国航天科技集团有限公司], https://www.spacechina.com/n25/n142/n152/index.html.
[47] Provisions on Foreign Investment in the Civil Aviation Industry [外商投资民用航空业规定], Civil Aviation Administration of China [中国民用航空局] (June 21, 2002), https://perma.cc/QX5Z-LB89; From Relative Closure to Opening to the Outside World: Civil Aviation Accelerates Development Through Foreign Investment [从相对封闭到对外开放: 民航借助外资加快发展], Civil Aviation Administration of China [中国民用航空局] (Dec. 10, 2008), https://perma.cc/GW9P-SFRZ; Proposal of the Central Committee of the Communist Party of China on Formulating the Tenth Five-Year Plan for National Economic and Social Development [中共中央关于制定国民经济和社会发展第

十个五年计划的建议], National Development & Reform Commission [国家发展和改革委员会] (October 11, 2000), https://perma.cc/H9HQ-GAFM; State Council Notice on Issuing the 13th Five-Year National Science and Technology Innovation Plan [国务院关于印发"十三五"国家科技创新规划的通知], State Council of the People's Republic of China [中华人民共和国国务院] (Aug. 8, 2016), https://perma.cc/RRA3-4KDR.

[48] China's Independently Developed C919 Large Passenger Aircraft Successfully Completes Maiden Flight [我国自主研制 C919 大型客机在上海圆满首飞], China Commercial Aircraft Co. News Center [中国商飞公司新闻中心], Ministry of Science & Technology of the People's Republic of China [中华人民共和国科学技术部] (May 8, 2017), https://perma.cc/5796-YECJ.

[49] China's Independently Developed C919 Large Passenger Aircraft Successfully Completes Maiden Flight [我国自主研制 C919 大型客机在上海圆满首飞], Ministry of Science & Technology of the People's Republic of China [中华人民共和国科学技术部 (May 8, 2017), https://www.most.gov.cn/ztzl/zdzx/gzxgz/dxfj/201705/t20170508_5134.html; Forging the C919's Steel Backbone [C919 铁骨锻成记], Commercial Aircraft Corporation of China [中国商用飞机有限责任公司] (Aug. 25, 2023), https://www.comac.cc/xwzx/gsxw/202308/25/t20230825_7368472.shtml.

[50] Introduction to the MA-60 [新舟 60 介绍], Civil Aviation Administration of China [中国民用航空局] (Sept. 23, 2015), https://perma.cc/YE6S-69J3. The same aircraft family was later adapted for maritime patrol, remote sensing, and other specialized missions, see also Domestically Produced MA-60 Remote-Sensing Aircraft Delivered [国产"新舟"60 遥感机交付], State Administration of Science, Technology and Industry for National Defense [国家国防科技工业局] (Dec. 4, 2019), https://perma.cc/ZMJ4-YF75.

[51] China's Large Transport Helicopters Take Flight from Here [中国大型运输直升机从这里起飞], State Administration of Science, Technology & Industry for National Defense [国家国防科技工业局] (Nov. 27, 2019), https://perma.cc/UR7T-5R87. The same industrial base later produced the civilian AC313 and military derivatives including the Z-18, see also Jane's Says China's Z-18 Can Carry 155mm Artillery and May Eventually Replace the Z-8 [简氏称中国直 18 可载 155 毫米火炮最终取代直 8], People's Daily Online [人民网] (Jan. 13, 2015), https://perma.cc/4JZR-2W25.

[52] See e.g., https://odin.t2com.army.mil/WEG/Asset/Y-7H_Chinese_Military_Transport_Aircraft; https://odin.t2com.army.mil/WEG/Asset/Z-8_(Zhishengji-8)_Chinese_Multi-Role_Helicopter; https://odin.t2com.army.mil/WEG/Asset/Z-9_Harbin_(WZ-9)_Chinese_Medium_Multi-Role_Helicopter.

[53] CRS, Chinese Military, People's Liberation Army, Page 48, https://www.congress.gov/crs_external_products/R/PDF/R46808/R46808.3.pdf.

[54] Honeywell Aerospace completes spin-off from Honeywell Technologies and begins trading on Nasdaq, Honeywell Aerospace (Jun. 29, 2026), https://www.honeywell.com/us/en/news/press-releases/2026/06/honeywell-aerospace-completes-spin-off-from-honeywell-technologies-and-begins-trading-on-nasdaq.

[55] Press Release, Department of War and Honeywell Aerospace Forge Agreement to Surge Production of Critical Munitions Technology, U.S. Dep't of War (Mar. 25, 2026), https://perma.cc/86KZ-78CE; Press Release, Honeywell Aerospace, Department of War Sign Groundbreaking Agreement to Accelerate Production of Defense Technologies, Honeywell (Mar. 25, 2026), https://perma.cc/75RL-9ULM.

[56]AGT1500 Gas Turbine Engine , Honeywell Aerospace, https://aerospace.honeywell.com/us/en/products-and-services/products/power-and-propulsion/engines/gas-turbine-engines/agt1500-gas-turbine-engine;T55 Turboshaft Engine , Honeywell Aerospace, https://aerospace.honeywell.com/us/en/products-and-services/products/power-and-propulsion/engines/turboshaft-engines/t55-turboshaft-engine; Military Auxiliary Power Unit,Honeywell Aerospace, https://aerospace.honeywell.com/us/en/products-and-services/products/power-and-propulsion/auxiliary-power-units/military-auxiliary-power-unit; Honeywell Auxiliary Power and Environmental Control Systems Chosen by Bell for Future Long Range Assault Aircraft,Honeywell Aerospace (Jun. 15, 2025), https://aerospace.honeywell.com/us/en/about-us/press-release/2025/06/honeywell-systems-chosen-by-bell-for-future-assault-aircraft.

[57] Annual Report (Form 10-K), Honeywell Int'l Inc., (Feb. 17, 2026), https://www.sec.gov/Archives/edgar/data/773840/000077384026000013/hon-20251231.htm;Honeywell, Howmet Juggle Rising Defense Demand and Commercial Aerospace Boom, Reuters (Mar. 17, 2026).

[58] Honeywell Aerospace Submission at 3 (Sept. 22, 2025), (on file with the Committee).

[59] Honeywell Aerospace Submission (Sept. 24, 2026), (on file with the Committee).

[60] *Id.* at 3.

[61] Innovative Honeywell Technologies Help COMAC's C919 Soar on Its First Flight, Honeywell (May 4, 2017), https://perma.cc/B56R-XFMC; ARJ21 gets new commercial name C909 COMAC unifies names of aircraft products as "COMAC+", COMAC News, https://english.comac.cc/news/latest/202411/20/t20241120_7396558.shtml.

[62] Subsidiaries of the Registrant (Ex. 21 to Annual Report (Form 10-K)) Honeywell Int'l Inc., (Feb. 14, 2025), https://www.sec.gov/Archives/edgar/data/773840/000077384025000010/exhibit2112312024.htm; Innovative Honeywell Technologies Help COMAC's C919 Soar on Its First Flight, Honeywell (May 4, 2017), https://perma.cc/B56R-XFMC.

[63] 2012 Private Placement Stock Plan [湖南博云新材料股份有限公司 2012 年度非公开发行股票预案] Hunan Boyun New Materials Co., Ltd., at 11 (Jul. 2012), https://static.cninfo.com.cn/finalpage/2012-07-14/61267942.PDF; Company Profile [博云简介], Hunan Boyun New Materials Co., Ltd., Hunan Boyun New Materials Co., Ltd. [湖南博云新材料股份有限公司], https://web.archive.org/web/20250509205603/https://www.hnboyun.com.cn/about.html (archived

May 9, 2025); Huang Boyun [黄伯云], Central South University Alumni Association [中南大学校友会], https://perma.cc/WTG3-ATBB.

[64] From 1980 to 1986, Huang Boyun earned his master's and doctoral degrees from Iowa State University in the United States. He then went on to the University of Tennessee and Oak Ridge National Laboratory for postdoctoral research. From 1986 to 1988, he conducted postdoctoral research at the University of Tennessee, USA. Honeywell Aerospace Submission (Sept. 24, 2026) (on file with the Committee).

[65] Initial Public Offering Prospectus [湖南博云新材料股份有限公司首次公开发行股票招股说明书]Hunan Boyun New Materials Co., Ltd., (Aug. 6, 2009); 2015 Annual Report [2015 年年度报告], Hunan Boyun New Materials Co., Ltd., (Apr. 2016), https://perma.cc/23CL-RSAJ; Feasibility Analysis Report on the Use of Proceeds from the Nonpublic Offering of Shares [非公开发行股票募集资金运用的可行性分析报告], Hunan Boyun New Materials Co., Ltd., at 2–3 (Jul. 13, 2012), https://perma.cc/VCR6-9HDP.

[66] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party (Sept. 22, 2025) (on file with Committee).

[67] Technology License Agreement Among Honeywell International Inc., Hunan Boyun New Materials Co., Ltd., Changsha Xinhang Wheels & Brakes Co., Ltd., and Honeywell Boyun Aero Systems (Hunan) Co., Ltd., (Feb. 17, 2012) (produced to the Committee).

[68]Technology License Agreement Among Honeywell International Inc., Hunan Boyun New Materials Co., Ltd., Changsha Xinhang Wheels & Brakes Co., Ltd., and Honeywell Boyun Aero Systems (Hunan) Co., Ltd., § 5.1.4, § 6.4 (Feb. 17, 2012) (produced to the Committee).

[69] Counsel for Honeywell International, Inc., to John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 8 (Sept. 22, 2025) (on file with the Committee).

[70] Technology License Agreement Among Honeywell International Inc., Hunan Boyun New Materials Co., Ltd., Changsha Xinhang Wheels & Brakes Co., Ltd., and Honeywell Boyun Aero Systems (Hunan) Co., Ltd. § 5.1.4 (Feb. 17, 2012) (produced to the Select Committee); Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party (Sept. 22, 2025) (on file with Committee).

[71] 2012 Private Placement Stock Plan [湖南博云新材料股份有限公司 2012 年度非公开发行股票预案]Hunan Boyun New Materials Co., Ltd., at 11 (Jul. 2012), https://static.cninfo.com.cn/finalpage/2012-07-14/61267942.PDF.

[72] Meeting Between Staff of the H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party and Representatives of Honeywell Aerospace (Dec. 8, 2025) (notes on file with the Select Committee).

[73] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party (Sept. 22, 2025) (on file with Committee).

[74] Feasibility Analysis Report on the Use of Proceeds from the Nonpublic Offering of Shares [非公开发行股票募集资金运用的可行性分析报告], Hunan Boyun New Materials Co., Ltd., at 3 (Jul. 13, 2012), https://perma.cc/VCR6-9HDP; 2012 Annual Report Summary [湖南博云新材料股份有限公司 2012 年度报告摘要], Hunan Boyun New Materials Co., Ltd., (2013), https://perma.cc/P22Q-MBCD.

[75] NUDT is a PLA university directly subordinate to China's Central Military Commission.

[76] Huang Chaofeng [黄朝峰], Military-Civil Cooperation Continues to Deepen: Military-Civil Fusion Helps Build the Changsha-Zhuzhou-Xiangtan Independent Innovation Demonstration Zone [军民融合助推长株潭自主创新示范区建设], Sina News (Dec. 9, 2014), https://perma.cc/XCJ2-TKB2.

[77] The primary Honeywell Aerospace entity physically located within the zone is HBAS.

[78] Lugu Concentrates More Than One Hundred Military-Civil Fusion Enterprises, Plans to Cultivate Industrial Clusters Exceeding RMB 10 Billion [麓谷聚集上百家军民融合企业 未来培育过百亿产业集群], Hunan Provincial Department of Commerce [湖南省商务厅] (Nov. 3, 2016), https://perma.cc/3MSG-42ST.

[79] 2012 Annual Report *9,* Hunan Boyun New Materials Co., Ltd.

[80] Response to Feedback on Application Documents for the Nonpublic Offering of Shares [关于非公开发行股票申请文件反馈意见的回复], Hunan Boyun New Materials Co., Ltd., at 33–34 (Sept. 2015), https://perma.cc/73R4-T7XR; 2016 Annual Report [2016 年年度报告], Hunan Boyun New Materials Co., Ltd., at 11 (Apr. 2017), https://perma.cc/8FEL-2XEV.

[81]Innovative Honeywell Technologies Help COMAC's C919 Soar on Its First Flight, Honeywell (May 5, 2017), https://www.honeywell.com/us/en/news/press-releases/2017/05/innovative-honeywell-technologies-help-comacs-c919-soar-on-its-first-flight.

[82] *E.g.* The 3D Printing System of the State Key Laboratory of Powder Metallurgy Has Been Debugged and Accepted [中南大学粉末冶金国家重点实验室 3D 打印系统已调试完毕并完成验收], PMBIZ (Dec. 2020), http://m.pmbiz.com.cn/news/1112202042472.html; Zhou Qiuyan, Magnificant Seventy Years of Striving for a New Ear丨Huang Boyun Leads His Team to Overcome the Toughest Challenges in the world's Materials Science Field, Winning the First Prize of the National Technological Invention Award (Apr. 10, 2019), https://www.icswb.com/h/100045/20190410/594475.html.

[83] Amended and Restated C919 FCS Cooperative Technology Development Contract Among Honeywell International Inc., AVIC Xi'an Flight Automatic Control Research Institute, and HonFei Flight Controls Technology Co., Ltd. pmbl. (2013) (produced to the Select Committee); Introduction, HonFei, https://perma.cc/ZC38-JVDT; Innovative Honeywell Technologies Help COMAC's C919 Soar on Its First Flight, Honeywell (May 4, 2017), https://perma.cc/B56R-XFMC.

[84] J.J. Long, Thomas Corbett, & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Inst. at 135-6 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.
[85] Addition of "Military End User" (MEU) List to the Export Administration Regulations and Addition of Entities to the MEU List,85 Fed. Reg. 83,793 (Dec. 23, 2020).
[86] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 5 (Sept. 22, 2025) (on file with Committee).
[87] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 5 (Sept. 22, 2025) (on file with Committee).
[88] Secondment refers to having a Honeywell employee work at the joint venture while remaining an employee for Honeywell.
[89] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 5 (Sept. 22, 2025) (on file with Committee).
[90] China's New Electromechanical Fly-Control System Applies Advanced Technologies from Next-Generation Aircraft, China News Online (Dec. 24, 2015), https://www.chinanews.com/mil/2015/12-24/7685912.shtml.
[91] China's New Electromechanical Fly-Control System Applies Advanced Technologies from Next-Generation Aircraft, China News Online (Dec. 24, 2015), https://www.chinanews.com/mil/2015/12-24/7685912.shtml.
[92] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 5 (Sept. 22, 2025) (on file with Committee).
[93]Amended and Restated C919 FCS Cooperative Technology Development Contract Among Honeywell International Inc., AVIC Xi'an Flight Automatic Control Research Institute, and HonFei Flight Controls Technology Co., Ltd. pmbl., art. 2.2(c) (2013) (produced to the Committee).
[94] Honeywell later told the Select Committee that FACRI and HonFei personnel could not access Honeywell source code, PRC end users received only compiled object code, and COMAC and CAAC could review no more than five percent of the source code during certification under controlled conditions where the material was "only shown, not distributed," see also *Flight Control Technology License Agreement Among Honeywell International Inc., AVIC Xi'an Flight Automatic Control Research Institute, and HonFei Flight Controls Technology Co., Ltd.*§ 5.1 (Jan. 17, 2012) (produced to the Select Committee); Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 6 (Sept. 22, 2025) (on file with Committee).
[95] Xi'an Expected to Win Approval as National Independent Innovation Demonstration Zone [西安有望获批国家自主创新示范区 方案已上报], China Daily [中国日报] (Mar. 10, 2015), https://perma.cc/LWU4-EV6Q.
[96] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 7 (Sept. 22, 2025) (on file with Committee).
[97] Counsel for Honeywell International, Inc., Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Chinese Communist Party 7 (Sept. 22, 2025) (on file with Committee).
[98] Small-Sized Aircraft Parabolic Box [小型飞机抛物箱], China Patent No. CN221367467U (Jul. 19, 2024), https://patents.google.com/patent/CN221367467U/en; HON-SC-0002146.pdf.
[99] The Institute of Automation Has Applied for a Patent for an Airborne Database Resource Management Method and Device Based on Data Characteristics [自控所申请一种基于数据特征的机载数据库资源管理方法及装置专利], Aviation Industry Network [航空产业网] (Apr. 19, 2024), https://www.chinaerospace.com/article/show/a5fd17da7e2c73c35f71d7cc93133d8c.
[100] The Institute of Automation Has Applied for a Patent for an Online Loading Method for Sub-Processor Software Based on Dual-Port RAM [自控所申请一种基于双口 RAM 的从处理器软件在线加载方法专利], Aviation Industry Network [航空产业网] (May 10, 2024), https://www.chinaerospace.com/article/show/ba9ed33f8a8ab8a16dd4b48179f54291.
[101] The Institute of Automation Has Applied for a Patent for a Deep-Learning-Based En-Route Scene-Matching Navigation Method and System [自控所申请一种基于深度学习的途中景象匹配导航方法和系统专利], Aviation Industry Network [航空产业网] (Jul. 16, 2024), https://www.chinaerospace.com/index.php/article/show/fe91617b536aeffc5163c15f8aa0a66d.
[102] In 2024, the General Electric Corporation (GE) executed a three-way split resulting in multiple independent businesses including GE Aerospace. Rajesh Kumar Singh & Abhijith Ganapavaram, *GE Completes Three-Way Split, Breaking Off from Its Storied Past*, Reuters (Apr. 2, 2024), https://www.reuters.com/markets/us/ge-completes-three-way-split-breaking-off-its-storied-past-2024-04-02/.
[103] Information represented by GE Aerospace to the Select Committee.
[104] *Id.*
[105] Annual Report (Form 10-K), General Electric Co., (Feb. 2026), https://d18rn0p25nwr6d.cloudfront.net/CIK-0000040545/f5af2bd1-3fdc-4ea1-b1ff-ed5812f2c4be.pdf.
[106] Proposed Charging Letter, In re General Electric Co., Directorate of Def. Trade Controls, U.S. Dep't of State, at 1, 3 (2026); Consent Agreement, In re General Electric Co., Directorate of Def. Trade Controls, U.S. Dep't of State, (2026).
[107] GE Aerospace, Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 2–3 (Sept. 12, 2025) (on file with Committee).

[108] GE Aerospace, Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 2–3 (Sept. 12, 2025) (on file with Committee).
[109] GEAE Evaluating Production Alliance in China, GE Aero. (Nov. 16, 1998), https://www.geaerospace.com/news/press-releases/other-news-information/geae-evaluating-production-alliance-china.
[110] GE and AVIC Sign Agreement for Integrated Avionics Joint Venture, GE Aerospace (Jan. 21, 2011), https://www.geaerospace.com/news/press-releases/systems/ge-and-avic-sign-agreement-integrated-avionics-joint-venture.
[111] J.J. Long, Thomas Corbet & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute, at 12-13, 79-80 (Jan. 2024), https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.
[112] Integrated modular avionics refers to a modern, real-time, computer network-based architecture for aircraft that consolidates multiple, formerly separate software applications onto shared, standardized computing modules, *see* Interview with General Manager of the GE Avionics Business.
[113] Briefing by GE Aerospace to Staff of the H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party (Sept. 11, 2026) (on file with Committee).
[114] Briefing by GE Aerospace to Staff of the H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party (Sept. 11, 2026) (on file with Committee).
[115] Briefing by GE Aerospace to Staff of the H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party (Sept. 11, 2026) (on file with Committee).
[116] GE Aerospace, Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 2 (Sept. 12, 2025) (on file with Committee).
[117] GE Aerospace, Letter to Hon. John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 2 (Sept. 12, 2025) (on file with Committee).
[118] Export License D1303959, Bureau of Indus. & Sec., U.S. Dep't of Com., (validated Jan. 12, 2023); Export License D1331234, Bureau of Indus. & Sec., U.S. Dep't of Com., (validated Oct. 30, 2023); Entities Identified as Chinese Military Companies Operating in the United States in Accordance with Section 1260H of the William M. ("Mac") Thornberry National Defense Authorization Act for Fiscal Year 2021,U.S. Dep't of Def. 1 (Oct. 5, 2022); Non-SDN Chinese Military-Industrial Complex Companies List, U.S. Dep't of the Treasury, Off. of Foreign Assets Control 2 (Dec. 16, 2021) (listing Aviation Industry Corporation of China, Ltd.; listing date June 3, 2021; effective date Aug. 2, 2021).
[119] Documents on file with the Committee.
[120] COMAC Thanks AVIAGE Systems, AVIC Aeronautical Radio Electronics Research Institute, and GE International Team [中国商飞感谢昂际航电、中国航空无线电电子研究所及 GE 国际团队], Shanghai Zizhu High-Tech Industrial Development Zone [上海紫竹高新技术产业开发区] (May 26, 2017), https://www.zizhupark.com/news/view/3078; Shanghai Zizhu High-Tech Industrial Development Zone [上海紫竹高新技术产业开发区], AVIC Aeronautical Radio Electronics Research Institute [中国航空无线电电子研究所], https://www.zizhupark.com/company/view/10.
[121] Li Feng [李锋], Northwestern Polytechnical University School of Electronics and Information [西北工业大学电子信息学院] (May 23, 2022), https://dianzi.nwpu.edu.cn/info/1377/11017.htm; Building an Open Foundation for the Low-Altitude Future: Skyla Aviation Releases IIS Intelligent Integrated System Architecture [共建开放底座，共赴低空未来｜蓝色向量发布 IIS 智能集成系统架构], Skyla Aviation [蓝色向量] (Jun. 11, 2026), https://www.skyla-aviation.com/LatestUpdates/89.
[122] AVIC 615 Institute: From Military Aviation to the C919 [中航工业 615 所：从军机到 C919], Jiefang Daily [解放日报] (Apr. 29, 2022), https://www.jfdaily.com/wx/detail.do?id=469786.
[123] 对话｜昂际航电张元中：我们对 C919 项目的成功充满信心 [Interview with AVIAGE Systems' Zhang Yuanzhong: We Are Confident in the Success of the C919 Project], 21 世纪经济报道 [21st Century Business Herald] (June 17, 2021), https://finance.sina.com.cn/chanjing/gsnews/2021-06-17/doc-ikqcfnca1611788.shtml; Civil Aircraft BeiDou Monitoring System [民航飞机北斗监控系统], Aviage Systems, https://www.aviagesystems.com/product/bds (last visited Aug. 17, 2026); ACDS Cockpit Display Solution [ACDS-驾驶舱显示解决方案], Aviage Systems, https://www.aviagesystems.com/product/ACDS (last visited Aug. 17, 2026).
[124] 对话｜昂际航电张元中：我们对 C919 项目的成功充满信心 [Interview with AVIAGE Systems' Zhang Yuanzhong: We Are Confident in the Success of the C919 Project], 21 世纪经济报道 [21st Century Business Herald] (June 17, 2021), https://finance.sina.com.cn/chanjing/gsnews/2021-06-17/doc-ikqcfnca1611788.shtml; Civil Aircraft BeiDou Monitoring System [民航飞机北斗监控系统], Aviage Systems, https://www.aviagesystems.com/product/bds (last visited Aug. 17, 2026); ACDS Cockpit Display Solution [ACDS-驾驶舱显示解决方案], Aviage Systems, https://www.aviagesystems.com/product/ACDS (last visited Aug. 17, 2026).
[125] 对话｜昂际航电张元中：我们对 C919 项目的成功充满信心 [Interview with AVIAGE Systems' Zhang Yuanzhong: We Are Confident in the Success of the C919 Project], 21 世纪经济报道 [21st Century Business Herald] (June 17, 2021), https://finance.sina.com.cn/chanjing/gsnews/2021-06-17/doc-ikqcfnca1611788.shtml; Civil Aircraft BeiDou Monitoring System [民航飞机北斗监控系统], Aviage Systems, https://www.aviagesystems.com/product/bds (last

visited Aug. 17, 2026); ACDS Cockpit Display Solution [ACDS-驾驶舱显示解决方案], Aviage Systems, https://www.aviagesystems.com/product/ACDS (last visited Aug. 17, 2026).
[126] Beidou Navigation Satellite [北斗导航卫星], SBG Systems, https://www.sbg-systems.com/glossary/beidou-navigation-satellite.
[127] Highlights Abound: Discussing the Military Elements of the Beijing Air Show [讲武谈兵丨亮点不少，谈谈北京航展上的军事元素], Sina Military [新浪军事] (Sept. 20, 2019), https://perma.cc/2Z8N-D49C.
[128]About AvioNova, Aviage Systems, https://www.aviagesystems.com/en/company/avio_nova (last visited July 10, 2026); AvioNova – Avionics and Flight Control Solutions for Emerging Low-Altitude Aircraft, Aviage Systems, https://www.aviagesystems.com/en/product/avio_nova.
[129] See, e.g., Wang Lifeng, Low-Altitude Economy Needs Institutional Guarantees, People's Daily Online (Mar. 13, 2026), https://perma.cc/E39W-GVMR; Shen Yingchun [沈映春], Low-Altitude Economy Department Established! Why Is the Low-Altitude Economy Attracting So Much Attention? [低空司成立！低空经济为何备受关注？], Communist Party Member Network [共产党员网] (Jan. 4, 2025), https://perma.cc/S2TL-K7W7; Expert View: Problems Facing the Development of China's Low-Altitude Economy and Policy Recommendations [专家观点：我国低空经济发展面临的问题与政策建议], National Development and Reform Commission [国家发展和改革委员会], (Dec. 30, 2024), https://perma.cc/BTU6-HFV2.
[130] Collins Aerospace, China Business Overview at 2, 6 (Sept. 4, 2025) (on file with the Select Committee).
[131] Foreign Ministry Spokesperson Zhao Lijian's Regular Press Conference on October 26, 2020 [2020 年 10 月 26 日外交部发言人赵立坚主持例行记者会], Ministry of Foreign Affairs of the People's Republic of China [中华人民共和国外交部] (Oct. 26, 2020), https://www.mfa.gov.cn/eng/xw/fyrbt/lxjzh/202405/t20240530_11346908.html; Foreign Ministry Spokesperson Wang Wenbin's Regular Press Conference on February 21, 2022 [2022 年 2 月 21 日外交部发言人汪文斌主持例行记者会], Ministry of Foreign Affairs of the People's Republic of China [中华人民共和国外交部] (Feb. 21, 2022), https://www.mfa.gov.cn/eng/xw/fyrbt/lxjzh/202405/t20240530_11347228.html.
[132] Collins Aerospace represented that ALRAC's activity has been narrowly tailored to providing system-integration testing on fully assembled and sealed units of Collins Aerospace's Integrated Surveillance System ("ISS") in the C919 aircraft.
[133] Joint Venture Agreement Between Rockwell Collins International Inc. and Wuxi AVIC Leihua Avionics Equipment Co., Ltd. *10* (produced to the Select Committee); RTX Corporation, Letter to Chairman John Moolenaar, House Select Committee on the Chinese Communist Party 1 (Jul. 20, 2026) (on file with the Committee).
[134] Joint Venture Agreement Between Rockwell Collins International Inc. and Wuxi AVIC Leihua Avionics Equipment Co., Ltd. at 10, 17, 22 (produced to the Committee).
[135] Joint Venture Agreement Between Rockwell Collins International Inc. and Wuxi AVIC Leihua Avionics Equipment Co., Ltd.at 6, 15 (produced to the Committee).
[136] Joint Venture Agreement Between Rockwell Collins International Inc. and Wuxi AVIC Leihua Avionics Equipment Co., Ltd. at 15 (produced to the Committee).
[137] Addition of "Military End User" (MEU) List to the Export Administration Regulations and Addition of Entities to the MEU List, 85 Fed. Reg. 83793 (Dec. 23, 2020); Exhibit 2: Copies of Product Brochures and Information Related to Collins Aerospace's Products Referenced in BIS Export Licenses Collins Aerospace, at 1 (Sept. 12, 2025); China Business Overview *6,* Collins Aerospace (Sept. 4, 2025); Letter from RTX Corp., to Hon. John Moolenaar, Chairman, H. Select Comm. on the Strategic Competition Between the U.S. & the Chinese Communist Party 2 (Jul. 20, 2026).
[138] Collins Aerospace represented that ALRAC's role in the joint venture was limited to system integration testing of fully assembled, sealed ISS units composed of four line-replaceable units— the Terrain Awareness System ("TAS"), the Transponder, the Traffic Collision Avoidance System ("TCAS"), and the Weather Radar—manufactured by Collins Aerospace for integration on the C919 aircraft. Collins Aerospace further represented that transfers to allow for system integration remained subject to U.S. export controls, and Collins Aerospace obtained licenses to continue ISS-related work after BIS designated LETRI as a MEU in 2020.
[139] Joint Venture Agreement Between Rockwell Collins International Inc. and Wuxi AVIC Leihua Avionics Equipment Co., Ltd.at 16 (produced to the Committee).
[140] J.J. Long, Thomas Corbett & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute 93-95 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.
[141] J.J. Long, Thomas Corbett & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute 170-171 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.
[142] Collins Aerospace represented to the Committee that regardless of the activities these entities undertake, Collins Aerospace has lawfully provided only commercial technology – specifically, system testing on fully assembled and sealed units of Collins Aerospace's ISS for the C919 commercial aircraft.
[143] J.J. Long, Thomas Corbett & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute 131 (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.

[144] Introduction to the Wuxi (National) Integrated Circuit Design Center [无锡（国家）集成电路设计中心简介], Wuxi Binhu District People's Government [无锡市滨湖区人民政府] (May 9, 2023), https://www.wxbh.gov.cn/doc/2023/05/09/3951395.shtml.
[145] Wuxi 13th Five-Year Informatization Plan [无锡市"十三五"信息化规划], Wuxi Municipal People's Government [无锡市人民政府] (Aug. 18, 2016), https://perma.cc/N6TG-8QKB; Establishing a RMB 2 Billion Development Fund to Build a New High Ground for IC Industry Clustering [设立 20 亿元发展基金 打造 IC 产业集聚新高地], Wuxi Daily [无锡日报] (Jul. 26, 2018), reprinted by China Council for the Promotion of International Trade, Wuxi Council [无锡市贸促会], https://perma.cc/B372-SK4K.
[146] School of Electronic Information Engineering/School of Integrated Circuits Recommends Dr. Zhou Xinjie of China Key System & Integrated Circuit Co., Ltd. for the 2022 Jiangsu Undergraduate Industry Professor Candidate List [电子信息工程学院/集成电路学院推荐中科芯集成电路有限公司周昕杰博士入选 2022 年江苏本科类产业教授拟聘名单], Nanjing University of Aeronautics and Astronautics [南京航空航天大学] (Oct. 3, 2022), https://perma.cc/3UV9-A9GR.
[147] Scientific Planning and Careful Organization: Technical Exchange on Improving the Indigenous and Controllable Level of Aerospace Remote-Sensing Hyperspectral Payloads [科学谋划，精心组织丨就提升航天遥感高光谱载荷自主可控水平进行技术交流], Xi'an Institute of Optics and Precision Mechanics, Chinese Academy of Sciences [中国科学院西安光学精密机械研究所] (Apr. 4, 2023), https://perma.cc/EHQ9-BFYP.
[148] The Nanjing University of Aeronautics and Astronautics ("NUAA") is one of China's "Seven Sons of National Defense," a group of universities with longstanding ties to the PRC defense establishment, see The Seven Sons of National Defence, in The China Defence Universities Tracker: Exploring the Military and Security Links of China's Universities at 6–7, Austl. Strategic Pol'y Inst. (Nov. 1, 2019), https://www.jstor.org/stable/resrep23061.7; China Electronics Technology Group Corporation The 58th Research Institute, Liao Jing Technology, https://en.liaojingtech.cn/news/46.html; Sarah Harting, Daniel, Gonzales, Michael J. Mazarr, Jon Schmid, Comparative Analysis of US and PRC Efforts to Advance Critical Military Technology, RAND Corp. https://www.rand.org/pubs/research_reports/RRA2197-1.html.
[149] Laboratory Overview [实验室简介], Key Laboratory of Aerospace Integrated Circuits and Microsystems, Nanjing University of Aeronautics and Astronautics [南京航空航天大学空天集成电路与微系统工业和信息化部重点实验室], https://perma.cc/VL5G-CZGN (last visited Aug. 19, 2026).
[150] COMAC Test and Verification Center Basic Testing Department and Nanjing NATE Communication Electronics Co., Ltd. Visit the Laboratory for Discussion and Exchange [中国商飞试验验证中心基础试验部、南京纳特通信电子有限公司来实验室座谈交流], Key Laboratory of Aerospace Integrated Circuits and Microsystems, Nanjing University of Aeronautics and Astronautics [南京航空航天大学空天集成电路与微系统工业和信息化部重点实验室] (Oct. 21, 2025), https://perma.cc/6XHJ-STKP.
[151] Collins Aerospace Submission to Committee (Sept. 23, 2026).
[152] Collins Aerospace and AVIC LETRI Receive FAA TSO Certification for COMAC C919 Weather Radar Antenna, Aerospace & Defense News (Nov. 8, 2022), https://www.asdnews.com/news/defense/2022/11/08/collins-aerospace-avic-letri-receive-faa-tso-certification-comac-c919-weather-radar-antenna.
[153] *Id.*
[154] *Id.*
[155] *2026 Campus Recruitment Announcement of Radar Institute of Aviation Industry Corporation of China*, State-owned Assets Supervision & Admin. Comm. Of the State Council (Sept. 5, 2025), https://web.archive.org/web/20260630164925/http://www.sasac.gov.cn/n2588035/n2588325/n2588350/c34363036/content.html.
[156] Collins Aerospace represented to the Committee that while its technical output may have increased after ALRAC's establishment, Collins Aerospace confirmed that it has not provided ALRAC with algorithms, radio frequency specifications, or access to any other technical data that could enable the development of advanced radar capabilities.
[157] Shi Lifang [石莉芳], Domestic and Foreign Suppliers Selected for China's C919 Communications and Navigation Systems [国产 C919 客机通信与导航系统确定国内外供应商], West China Metropolis Daily [华西都市报] (Jun. 28, 2010) reproduced in Sina Military [新浪军事], https://perma.cc/M3WB-RDZN; Zhang Kuiyong [张魁勇] & Miao Qin [缪琴], C919 Communications and Navigation Systems to Be "Made in Chengdu" [国产大飞机通信导航系统"成都造"], Chengdu Daily [成都日报] (Jun. 27, 2010) reproduced in Sina [新浪], https://perma.cc/3VA4-P7AL.
[158] Rockwell Collins and CETCA Announce Grand Opening of Joint Venture for Communication and Navigation Solutions, Rockwell Collins, reproduced in Aerocontact, (Apr. 2, 2014), https://perma.cc/NY4R-JJQX. Collins Aerospace represented that this quote was in reference to the indigenous and western commercial aircraft platforms supported. Collins Aerospace further represented that over time, however, this work has not materialized, as RCCAC now only provides communications and navigation products and related MRO services for COMAC's C919 and ARJ-21/C909 platforms.
[159] [Recruitment] CETC Avionics Co., Ltd. Recruiting Students in Various Majors [【招聘】中**电**科航空**电**子有限公司招聘各**专业**学生 26 名], Qingdao Univ. of Sci. & Tech., Sch. of Mathematics & Physics [青**岛**科技大学数理学院] (Aug. 31, 2011), https://perma.cc/686S-APRL;CETC 14th Research Institute: Innovating to Forge the "Eyes of the Three Services [中国**电**科第十四研究所：**创**新**锻**造"三**军**之眼"], State Admin. of Sci., Tech. & Indus. for Nat'l Def. [国家国

防科技工业局] (May 28, 2019), https://www.sastind.gov.cn/n10086200/n10086344/c10166036/content.html; Xi'an Navigation Technology Research Institute (CETC 20th Research Institute)[西安导航技术研究所（中国电子科技集团公司第二十研究所）], 51job, https://campus.51job.com/cetc20/html/intro.html; China Electronics Technology Group Corporation 28th Research Institute [中国电子科技集团公司第二十八研究所], Jilin Univ. Career & Entrepreneurship Serv. [吉林大学就业创业], https://jdjyw.jlu.edu.cn/portal/company/details?id=1600; *CETC Network & Communications Research Institute (CETC 54th Research Institute)* [中国电科网络通信研究院（中国电子科技集团公司第五十四研究所）], China Satellite Navigation Conf. [中国卫星导航年会], https://www.beidou.org/exhibitordetail_338.html.

[160] CETC Avionics Co., Ltd. Participates in the 12th China International Aviation & Aerospace Exhibition [中电科航空电子有限公司参加"第十二届中国国际航空航天博览会"], China Civil Aviation Network [中国民用航空网] (Nov. 7, 2018), https://perma.cc/Q2MC-6H7P.

[161] Rockwell Collins and CETCA Announce Grand Opening of Joint Venture for Communication and Navigation Solutions, Rockwell Collins, , (Apr. 2, 2014), reproduced in Aerocontact, https://perma.cc/NY4R-JJQX; *China Air Force's "Hercules" Y-8 Aircraft* [中国空军的"大力神"运八飞机], Dazhong Net [大众网] (Jul. 24, 2006), https://www.dzwww.com/js/bqk/t20060227_1368060.htm.

[162] Joint Venture Agreement Between Rockwell Collins International Inc. and CETCA *3* (produced to the Select Committee).

[163] Joint Venture Agreement Between Rockwell Collins International Inc. and CETCA First Modification *2* (produced to the Select Committee).

[164] Joint Venture Agreement Between Rockwell Collins International Inc. and CETCA JVC *178* (produced to the Select Committee). Add'l Collins Aerospace represented to the Committee these documents are standard procedural documents.

[165] *See* License No. D1344785.

[166] Amendment to the Joint Venture Agreement Between Rockwell Collins and CETCA 3 (produced to the Select Committee).

[167] China and the United States Cooperate to Jointly Develop the C919 Communications and Navigation System [中美合作共同研制 C919 通信导航系统], State Admin. of Sci., Tech. & Indus. for Nat'l Def. [国家国防科技工业局] (Apr. 9, 2014), https://www.sastind.gov.cn/n10086200/n10086331/c10332110/content.html.

[168] China Electronics Technology Group "Supports and Congratulates" Successful First Flight of C919 [中国电科"助·贺"C919 首飞成功], China Elecs. Tech. Grp. Corp. [中国电子科技集团公司] (May 16, 2017), reproduced in People's Political Consultative Conference Daily Online [人民政协网].

[169] China Electronics Technology Group "Supports and Congratulates" Successful First Flight of C919 [中国电科"助·贺"C919 首飞成功], China Elecs. Tech. Grp. Corp. [中国电子科技集团公司] (May 16, 2017), reproduced in People's Political Consultative Conference Daily Online [人民政协网].

[170] CETC Avionics Co., Ltd. Participates in the 12th China International Aviation & Aerospace Exhibition [中电科航空电子有限公司参加"第十二届中国国际航空航天博览会"], China Civil Aviation Network [中国民用航空网] (Nov. 7, 2018), https://perma.cc/Q2MC-6H7P.

[171] Notice Announcing the Thirty-Eighth Batch of Level II and Level III Standardized Safe-Production Units in Sichuan's Military Industry System [关于公布四川军工系统安全生产标准化二级、三级达标单位（第三十八批）的通知], Sichuan Provincial Office of Science, Technology and Industry for National Defense [四川省国防科学技术工业办公室] (Jul. 11, 2022).

[172]AVIC Chengdu Aircraft Industry (Group) Co., Ltd. [中航工业成都飞机工业（集团）有限责任公司], Chengdu Aeronautic Polytechnic [成都航空职业技术学院], https://www.cap.edu.cn/hkzb/info/1231/5031.htm; AVIC Chengdu Aircraft Design and Research *Institute* [中国航空工业集团有限公司成都飞机设计研究所], State Administration of Science, Technology and Industry for National Defense [国家国防科技工业局] (Jun. 13, 2019).

[173] Collins Aerospace Submission to Committee (Sept. 23, 2026).

[174] Rockwell Collins and CETCA Announce Grand Opening of Joint Venture for Communication and Navigation Solutions, Rockwell Collins, (Apr. 2, 2014), reproduced in Aerocontact, https://perma.cc/NY4R-JJQX; China's Defense Spending Still Fairly Low: Official, People's Daily Online (Mar. 7, 2004), https://en.people.cn/200403/07/eng20040307_136742.shtml; Yang Jian [杨坚], Ben De: The "Desperate Warrior" Who Sharpened the Eyes of China's War Eagles [贲德：擦亮战鹰之眼的"拼命三郎"], China Science Daily [中国科学报] (Mar. 22, 2024), https://kjc.cqu.edu.cn/info/1134/20037.htm.

[175] 2023 Annual Report [2023 年年度报告], China Electronics Technology Digital Technology Co., Ltd. [中电科数字技术股份有限公司], (Apr. 2, 2024), http://static.cninfo.com.cn/finalpage/2024-04-02/1219493999.PDF.

[176] Results Announcement for Multi-Band, Multi-Mode RCP and RNP Test Verification System for Complex Environments—Satellite Navigation and RF Excitation Management System [面向复杂环境下的多频段、多制式、RCP 及 RNP 测试验证系统—卫星导航及射频激励管理系统-结果公告], China International Tendering Co., Ltd. [中招国际招标有限公司], https://www.cntcitc.com.cn/more/article.html?gContentId=2b8347e4d57448d887f5d85a07ed1347; Amendment Announcement for L-Band Satellite Communications Service Simulation Test System [L 波段卫通业务仿真测试系统-变更公告], China International Tendering Co., Ltd. [中招国际招标有限公司] (July 22, 2025), https://www.cntcitc.com.cn/more.html?chanType=3&chanId=14&contentId=05cc669a492b4ec3bc43672d57f3fe59; Public Notice of Candidates for Design and Development Platform for High-Safety, High-Reliability RNP

Navigation Equipment [面向高安全、高可靠、RNP 的导航设备设计开发平台-中标候选人公示], China Tendering Industrial Development (Beijing) Co., Ltd. [中招工业发展（北京）有限公司] (Apr. 15, 2026) (Tender No. ZC26G220008); Public Notice of Candidates for Design and Development Platform for Multi-Band, Multi-Mode RCP+ Communications Equipment for Complex Environments [面向复杂环境下的多频段、多制式、RCP+通信设备设计开发平台-中标候选人公示], China Tendering Industrial Development (Beijing) Co., Ltd. [中招工业发展（北京）有限公司] (Jul. 9, 2026), https://365trade.com.cn/jhwzb/843310.jhtml.

[177] J.J. Long, Thomas Corbett & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Institute (Jan. 2024) https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.

[178] As defined in the regulations, a Military End-User means a national armed services (army, navy, marine, air force, or coast) as well as the national guard and national police, government intelligence or reconnaissance organizations, (excluding those described in 15 § 744.22(f)(2)) or any person or entity whose actions or functions are intended to support "military end uses" as defined in the regulations. 15 C.F.R. § 744.21(g).

[179] 15 C.F.R. § 744.21 (2020); Expansion of Export, Reexport, and Transfer (In-Country) Controls for Military End Use or Military End Users in the People's Republic of China, Russia, or Venezuela, 85 Fed. Reg. 23,459 (Apr. 28, 2020).

[180] Note this chart summarizes the export control process and may not be indicative of all the nuances associated with export control determination and licensing. The licensing determination flow chart comes from the regulations. Moreover, the flow chart does not address situations such as appeal of a license denial.

[181] 15 C.F.R. § 736.2(b)(5) (2026); 15 C.F.R. pt. 744 (2026).

[182] 15 C.F.R. §§ 744.11, 744.16, 744.21 (2026).

[183] 15 C.F.R. §§ 744.16, 744.21 (2026).

[184] 15 C.F.R. § 744.21(a)(1) (2026); 15 C.F.R. pt. 744, supp. no. 2 (2026).

[185] Guidance on End-User and End-Use Controls and U.S. Person Controls, Bureau of Indus. & Sec., U.S. Dep't of Com.; 15 C.F.R. § 744.21(g) (2026); 15 C.F.R. pt. 744, supp. no. 7 (2026).

[186] Commerce Department Will Publish First Military End User List Naming More Than 100 Chinese and Russian Companies, Bureau of Indus. & Sec., U.S. Dep't of Com., (Dec. 21, 2020).

[187] Commerce Department Will Publish First Military End User List Naming More Than 100 Chinese and Russian Companies, Bureau of Indus. & Sec., U.S. Dep't of Com., (Dec. 21, 2020).

[188] 15 C.F.R. § 748.4 (2026); 15 C.F.R. pt. 748, supp. no. 1, Blocks 18–22 (2026).

[189] Honeywell International Inc., Letter of Explanation, Honeywell, HON-SC-0000066–0000078, at HON-SC-0000066–0000069 (Feb. 5, 2021); Honeywell International Inc., Export License, HON-SC-0000003–0000005, at HON-SC-0000003 (Sept. 2, 2025).

[190] Honeywell International Inc., Letter of Explanation, Honeywell, HON-SC-0000046–0000058, at HON-SC-0000046–0000047 (Apr. 23, 2021); Honeywell International Inc., Export License, HON-SC-0000006–0000008, at HON-SC-0000006 (Sept. 22, 2021).

[191] General Electric Co., Export License, at 1 (Jan. 12, 2023); General Electric Co., Export License, at 1 (Oct. 30, 2023).

[192] Bureau of Industry & Sec., Expansion of End-User Controls to Cover Affiliates of Certain Listed Entities, 90 Fed. Reg. 47,201, 47,201–02 (Sept. 30, 2025).

[193] Bureau of Industry & Sec., One-Year Suspension of End-User Controls for Affiliates of Certain Listed Entities, 90 Fed. Reg. (Nov. 10, 2025); Exec. Order No. 14,358, 90 Fed. Reg. 50,729, 50,729–30 (Nov. 7, 2025).

[194] 15 C.F.R. § 750.3(a)–(b) (2026).

[195] 15 C.F.R. § 750.3(a)–(b) (2026).

[196] 15 C.F.R. § 744.21(e)(1), (3) (2026).

[197] 15 C.F.R. § 742.4(b)(7)(i) (2026).

[198] 15 C.F.R. § 742.4(b)(7)(ii)(A), (C), (E)–(F) (2026).

[199] ITAR are the set of United States government rules that control the export and temporary import of defense-related technology, technical data, articles, and defense services.

[200] U.S. Department of State Concludes $13 Million Settlement of Alleged Export Violations by Honeywell International, Inc., *U.S.* Dep't of State, (May 3, 2021); Proposed Charging Letter, In re Honeywell International Inc., Directorate of Def. Trade Controls, U.S. Dep't of State, at 4–5 (2021).

[201] U.S. Department of State Concludes $200 Million Settlement Resolving Export Violations by RTX Corporation, U.S. Dep't of State, (Aug. 30, 2024); Proposed Charging Letter, In re RTX Corp., Directorate of Def. Trade Controls, U.S. Dep't of State, at 6–7 (2024).

[202] Proposed Charging Letter, In re General Electric Co., Directorate of Def. Trade Controls, U.S. Dep't of State, at 1, 3 (2026); Consent Agreement, In re General Electric Co., Directorate of Def. Trade Controls, U.S. Dep't of State, (2026).

[203]United States Presses for Rapid Enforcement of Two World Trade Organization (WTO) Victories, U.S. Trade Rep. (Oct. 3, 2016), https://ustr.gov/about-us/policy-offices/press-office/press-releases/2016/october/united-states-presses-rapid.

[204] *Id.*

[205] Huaxia, China's Expanding Aviation Capabilities "a Very Positive Development" Says Airbus Executive, Xinhua (Jul. 25, 2026), https://english.news.cn/20260725/3ac7fec767a84184a08541877f1bb29e/c.html.

[206] Airbus Lifecycle Services Centre dismantles and recycles its first aircraft, Airbus (Aug. 29, 2024), https://www.aircraft.airbus.com/en/newsroom/press-releases/2024-08-airbus-lifecycle-services-centre-dismantles-and-recycles-its-first.
[207] Airbus inaugurates its A330 Completion & Delivery Centre in China, Airbus (Sept. 20, 2017), https://www.airbus.com/en/newsroom/press-releases/2017-09-airbus-inaugurates-its-a330-completion-delivery-centre-in-china.
[208] China's Airbus H135 Final Assembly Line Starts Operations, Airbus (Apr. 17, 2019), https://www.airbus.com/en/newsroom/press-releases/2019-04-chinas-airbus-h135-final-assembly-line-starts-operations.
[209] Airbus in China, Airbus, https://www.airbus.com/en/about-us/our-worldwide-presence/airbus-in-asia-pacific/airbus-in-china.
[210] *Id*.
[211] Myanmar: NGOs Welcome Airbus's Decision to Divest from Chinese Company Allegedly Linked to Myanmar Military, Business & Human Rights Resource Centre(2025), https://www.business-humanrights.org/en/latest-news/myanmar-ngos-welcome-airbuss-decision-to-divest-from-chinese-company-allegedly-linked-to-myanmar-military/; Justice for Myanmar, Airbus Divests from Chinese Arms Company Following Global Campaign (Jun. 19, 2025), https://www.justiceformyanmar.org/press-releases/airbus-divests-from-chinese-arms-company-following-global-campaign.
[212] Board of Directors — Mr. Xu Gang, company website, AviChina Industry & Technology Company Limited, https://www1.hkexnews.hk/listedco/listconews/sehk/2025/0328/2025032801271.pdf.
[213] Airbus Divests from Chinese Arms Company Following Global Campaign, Justice for Myanmar, (Jun. 19, 2025), (Airbus spokesperson statement).
[214] Airbus China CEO Xu Gang, quoted in "空客中国公司 CEO 徐岗：空客升级与中国航空业全面战略合作 [Airbus China CEO Xu Gang: Airbus Upgrades and Comprehensive Strategic Cooperation in China's Aviation Industry]," Sohu, (May 7, 2018).
[215] Figeac Aéro Continues to Make Headway in China, Airframer (Figeac Aéro press release), (May 6, 2024), https://www.airframer.com/news_story.html?release=91854; Nanshan FIGEAC Aero Industry Co., Ltd. Passed the AS9100 Quality Management System Certification for the First Time, Nanshan Group, (Apr. 9, 2023), https://en.nanshan.com.cn/News_1/142.html.
[216] Figeac Aéro Continues to Make Headway in China, Airframer, (May 6, 2024), https://www.airframer.com/news_story.html?release=91854.
[217] George Xu, Airbus, https://www.airbus.com/en/about-us/our-governance/george-xu; He, Exclusive Interview with Airbus China CEO Xu Gang.
[218] George Xu, Airbus, https://www.airbus.com/en/about-us/our-governance/george-xu; He, Exclusive Interview with Airbus China CEO Xu Gang.
[219] George Xu, Airbus, https://www.airbus.com/en/about-us/our-governance/george-xu; He, Exclusive Interview with Airbus China CEO Xu Gang.
[220] George Xu, AIRBUS, https://www.airbus.com/en/who-we-are/our-governance/george-xu (last visited [date], 2026); He Mingliang [何铭亮], Exclusive Interview with Airbus China CEO Xu Gang [独家专访空客中国 CEO 徐岗：与波音、商飞共同竞争增量市场，扎根中国谋求共赢], TIME FINANCE [时代财经] (Nov. 29, 2024), https://www.tfcaijing.com/article/page/37626f576f744c5a4f615258306c6e345a46316b52673d3d.
[221] George Xu, Airbus, https://www.airbus.com/en/about-us/our-governance/george-xu.
[222]United States v. Airbus, Case: 1:20-cr-21, ECF No. 1 Information (D.D.C. Jan. 2020).
[223] Ibid.
[224] He, Exclusive Interview with Airbus China CEO Xu Gang.
[225] CFOSAT, CNES, https://cnes.fr/en/projects/cfosat; China-France Oceanography Satellite Launches on Research Mission, Spaceflight Now, (Oct. 29, 2018).
[226] CFOSAT, CNES, https://cnes.fr/en/projects/cfosat; China-France Oceanography Satellite Launches on Research Mission, Spaceflight Now, (Oct. 29, 2018).
[227] CFOSAT, CNES, https://cnes.fr/en/projects/cfosat (identifying SHOM among mission partners); the dual-use characterization reflects the report's assessment of the operational applications of ocean wind and wave data.
[228] Ian Easton, The Chinese Invasion Threat: Taiwan's Defense and American Strategy in Asia, Project 2049 Institute, (2017); Malcolm Davis, Floating Piers and Sinking Hopes: China's Logistics Challenge in Invading Taiwan, ASPIThe Strategist, (2024); A Strait Too Far, War on the Rocks, (Jun. 2023).
[229] Ian Easton, The Chinese Invasion Threat: Taiwan's Defense and American Strategy in Asia, Project 2049 Institute, (2017); Malcolm Davis, Floating Piers and Sinking Hopes: China's Logistics Challenge in Invading Taiwan, ASPIThe Strategist, (2024); A Strait Too Far, War on the Rocks, (Jun. 2023).
[230] Ian Easton, The Chinese Invasion Threat: Taiwan's Defense and American Strategy in Asia, Project 2049 Institute, (2017); Malcolm Davis, Floating Piers and Sinking Hopes: China's Logistics Challenge in Invading Taiwan, ASPIThe Strategist, (2024); A Strait Too Far, War on the Rocks, (Jun. 2023).
[231] Military and Security Developments Involving the People's Republic of China 2025, U.S. Department of Defense, (Dec. 23, 2025); 2025 Annual Report to Congress, U.S.-China Economic and Security Review Commission, ch. 11 (Taiwan).

[232] Press release, New-Generation Airbus-Built Optical Constellation: CO3D Satellites, Airbus, (Jun. 2025), https://www.airbus.com/en/newsroom/press-releases/2025-06-new-generation-airbus-built-optical-constellation-co3d-satellites-en.
[233] Press release, Dassault Systèmes Signs Strategic Cooperation Agreement with China Aerospace Science and Technology Corporation, Dassault Systèmes, (Jan. 9, 2018).
[234] Ibid.; "About Dassault Systèmes," Dassault Systèmes.
[235] Dassault Systèmes Signs Strategic Cooperation Agreement with China Aerospace Science and Technology Corporation, Dassault Systèmes, (Jan. 9, 2018).
[236] What Strategic Cooperation Has Been Born from the Establishment of the China-France Entrepreneurs Committee? [中法企业家委员会成立催生了哪些战略合作？], E-WORKS, reprinted in OFWEEK (Feb. 3, 2018), https://gongkong.ofweek.com/2018-02/ART-310002-8500-30197179.html.
[237] Alexander Bowe, China's Pursuit of Space Power Status and Implications for the United States, U.S.-China Econ. & Sec. Rev. Comm'n, at 11 (Apr. 11, 2019), https://www.uscc.gov/sites/default/files/Research/USCC_China's%20Space%20Power%20Goals.pdf; Shirley A. Kan, China: Possible Missile Technology Transfers Under U.S. Satellite Export Policy—Actions and Chronology, Congressional Research Service, 98-485 F, (Oct. 6, 2003), https://www.everycrsreport.com/files/20031006_98-485F_da6014009a3511321a51c2ee3b73f061906f7bf5.html.
[238] *Id.*; What Strategic Cooperation Has Been Born from the Establishment of the China-France Entrepreneurs Committee? [中法企业家委员会成立催生了哪些战略合作？], e-works Digital Enterprise Network [e-works 数字化企业网], reprinted in OFweek (Feb. 3, 2018), https://gongkong.ofweek.com/2018-02/ART-310002-8500-30197179.html.
[239] Beijing Shenzhou Aerospace Software Technology Co., Ltd. corporate profile, https://baike.baidu.com/en/item/Beijing%20Shenzhou%20Aerospace%20Software%20Technology%20Co.%2C%20Ltd./888276, (noting the December 2025 joint venture with Dassault Systèmes International to establish Aerospace Xingyuan Digital Intelligence (Shanghai) Technology Co., Ltd., registered capital €20 million).
[240] "中法企业家委员会成立催生了哪些战略合作？ [What Strategic Cooperation Has Been Born from the Establishment of the China-France Entrepreneurs Committee?], e-works Digital Enterprise Network (republished via OFweek), (Feb. 3, 2018), https://gongkong.ofweek.com/2018-02/ART-310002-8500-30197179.html.
[241] Ibid. (remarks of Gong Bo, CASC chief engineer and chairman of Beijing Shenzhou Aerospace Software Technology Co., Ltd.).
[242]Dassault Systèmes Successfully Completes Tender Offer for Exa Corporation, Dassault Systèmes (Nov. 17, 2017), https://www.3ds.com/newsroom/press-releases/dassault-systemes-successfully-completes-tender-offer-exa-corporation.
[243] Exa Corporation to Be Acquired by Dassault Systèmes, Exa Corp., (Sept. 28, 2017) (Ex. 99.1), https://www.sec.gov/Archives/edgar/data/890264/000119312517297999/d463953dex991.htm.
[244] Dassault Systèmes Completes IQMS Acquisition, Dassault Systems (Jan. 8, 2019), https://investor.3ds.com/news-releases/news-release-details/dassault-systemes-completes-iqms-acquisition.
[245]China: Fully committed to the world's most dynamic aviation market, Safran, https://www.safran-group.com/countries/china.
[246] *See* Joint Venture: Safran Group & Shanghai Aircraft Manufacturing Company, Datenna, https://www.datenna.com/resources/joint-venture-safran-group/.
[247] 王普, Xi'an Saiwei Nacelle Company Delivers Its First A320 Thrust Reverser Door [西安赛威短舱公司交付首件A320 反推装置门], China Aviation News [中国航空报] (Apr. 20, 2012), http://www.ce.cn/aero/news/201204/20/t20120420_21151795.shtml
[248] Safran and AECC Introduce WZ16 the First Jointly-Developed Aero Engine to be Certified in China, Safran, (Oct. 10, 2019), https://www.safran-group.com/pressroom/safran-and-aecc-introduce-wz16-first-jointly-developed-aero-engine-be-certified-china-2019-10-10/pdf-download#.
[249] *Id.*
[250] Addition of Military End User (MEU) List to the Export Administration Regulations and Addition of Entities to the MEU List, 85 Fed. Reg. 83,832 (Dec. 23, 2020).
[251] Information on file with the Committee.
[252] *Id.*
[253] Safran, Adriden 3C, the first jointly-developed aero engine to be entirely certified in China, https://www.safran-group.com/products-services/ardiden-3c-first-jointly-developed-aero-engine-be-entirely-certified-china.; Industry and Information Technology Department of Hunan Province, Hunan Aviation Equipment Industry Achieves Another Fruitful Result: The Civil Turboshaft Engine AES100 Received Model Certificate, Sept. 9,2024 https://gxt.hunan.gov.cn/gxt/ztzl/zzgdzt/zzgdkqy/202409/t20240909_33450336.html.
[254]Joint Venture: Safran Group & Shanghai Aircraft Manufacturing Company, Datenna, https://www.datenna.com/resources/joint-venture-safran-group/.
[255] Addition of "Military End User" (MEU) List to the Export Administration Regulations and Addition of Entities to the MEU List, Bureau of Industry & Security, 85 Fed. Reg. 83,494 (Dec. 23, 2020).
[256]Joint Venture: Safran Group & Shanghai Aircraft Manufacturing Company, Datenna, https://www.datenna.com/resources/joint-venture-safran-group/.
[257] *Id.*

[258] DOD Releases List of Chinese Military Companies in Accordance with Section 1260H of the National Defense Authorization Act for Fiscal Year 2021, U.S. Dep't of War (Jan. 7, 2025), https://www.war.gov/News/Releases/Release/Article/4023145/dod-releases-list-of-chinese-military-companies-in-accordance-with-section-1260/.

[259] 王普, Xi'an Saiwei Nacelle Company Delivers Its First A320 Thrust Reverser Door [西安赛威短舱公司交付首件A320反推装置门], China Aviation News [中国航空报] (Apr. 20, 2012), http://www.ce.cn/aero/news/201204/20/t20120420_21151795.shtml.

[260]DOD Releases List of Chinese Military Companies in Accordance with Section 1260H of the National Defense Authorization Act for Fiscal Year 2021, U.S. Dep't of War (Jan. 7, 2025), https://www.war.gov/News/Releases/Release/Article/4023145/dod-releases-list-of-chinese-military-companies-in-accordance-with-section-1260/.

[261] J.J. Long, Thomas Corbett, & Dan Shats, Organization and Structure of the Aviation Industry Corporation of China (AVIC), China Aerospace Studies Inst., (Jan. 2024), https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.

[262] DOD Releases List of Chinese Military Companies in Accordance with Section 1260H of the National Defense Authorization Act for Fiscal Year 2021, DoW (Jan. 7, 2025), https://www.war.gov/News/Releases/Release/Article/4023145/dod-releases-list-of-chinese-military-companies-in-accordance-with-section-1260/.

[263] Safran Nacelles' Joint Venture in China Assembles Its 8,000th Thrust Reverser Door for CFM56 Jet Engines, Safran Group (Nov. 3, 2016), https://www.safran-group.com/news/safran-nacelles-joint-venture-china-assembles-its-8000th-thrust-reverser-door-cfm56-jet-engines-2016-11-03.

[264] C-17 Globemaster III, U.S. Air Force, https://www.af.mil/About-Us/Fact-Sheets/Display/Article/1529726/c-17-globemaster-iii/.

[265] China — Fully Committed to the World's Most Dynamic Aviation Market, Safran Group, https://www.safran-group.com/countries/china.

[266]Entity List: Revisions and Additions, 66 Fed. Reg. 24264 (May 14, 2001); Beihang University is the name adopted by Beijing University of Aeronautics and Astronautics, https://ev.buaa.edu.cn/About/History.htm.

[267] Ian Petchenik, China Eastern Airlines Flight 5735 Crashes En Route to Guangzhou, FlightRadar24 (May 5, 2026), https://www.flightradar24.com/blog/flight-tracking-news/major-incident/china-eastern-airlines-flight-5735-crashes-en-route-to-guangzhou/.

[268] Letter from Chairman John Moolenaar, House Select Committee on the Chinese Communist Party, to Secretary of War Pete Hegseth (Apr. 13, 2026).

[269]Safran Announces the Acquisition of Flight Control and Actuation Activities from Collins Aerospace, Safran (Jul. 21, 2025).

ATTACHMENT A – AIRBUS LETTER

JOHN MOOLENAAR, MICHIGAN
CHAIRMAN
ROB WITTMAN, VIRGINIA
ANDY BARR, KENTUCKY
DAN NEWHOUSE, WASHINGTON
DARIN LAHOOD, ILLINOIS
NEAL DUNN, FLORIDA
DUSTY JOHNSON, SOUTH DAKOTA
ASHLEY HINSON, IOWA
CARLOS GIMENEZ, FLORIDA
GUS BILIRAKIS, FLORIDA
YOUNG KIM, CALIFORNIA
NATHANIEL MORAN, TEXAS
ZACH NUNN, IOWA

RAJA KRISHNAMOORTHI, ILLINOIS
RANKING MEMBER
KATHY CASTOR, FLORIDA
ANDRÉ CARSON, INDIANA
SETH MOULTON, MASSACHUSETTS
RO KHANNA, CALIFORNIA
MIKIE SHERRILL, NEW JERSEY
HALEY STEVENS, MICHIGAN
RITCHIE TORRES, NEW YORK
SHONTEL BROWN, OHIO
GREG STANTON, ARIZONA
JILL TOKUDA, HAWAII

Congress of the United States
House of Representatives
SELECT COMMITTEE ON THE CHINESE COMMUNIST PARTY

August 14, 2025

Robin Hayes
Chief Executive Officer
Airbus Americas
2550 Wasser Terrace, Suite 9100
Herndon, VA 20171

Dear Mr. Hayes,

The Committee is reviewing U.S. and western aerospace companies' engagements with the Chinese market. We write to begin a dialogue and request further information regarding Airbus's ongoing relationship with the Aviation Industry Corporation of China (AVIC). Airbus is a major western defense contractor that has contributed unparalleled capabilities. It appears that Airbus also maintains a longstanding partnership with AVIC, a Chinese state-owned enterprise that directly supports the People's Liberation Army (PLA)—an entity the United States may one day be forced to confront in a military conflict. The Committee seeks to gain a better understanding of Airbus's Chinese operations and collaboratively work on strengthening U.S. export control and outbound investment policy.

For the past 25 years, the U.S. government and Congress operated under a naïve assumption: robust economic engagement would lead the Chinese Communist Party (CCP) to political liberalization.[i] In furtherance of this misguided objective, the U.S. government encouraged businesses including aerospace companies such as Airbus to make significant investments in the People's Republic of China (PRC). The promise of potentially the largest market in the world presented a tremendous opportunity. But the situation has changed.

America's misguided optimism about China turned to clear-eyed confrontation once the U.S. Government finally recognized the threat posed by the CCP. As Congress and the U.S. Government shift their approach towards confronting this existential threat, we expect companies to work with us in good faith to unwind relationships that undermine U.S. national security.[ii] U.S. export controls help to protect U.S. national security and bolster America's technological superiority, ensuring that U.S. developed or derived technology does not get used against Americans or to erode our technical edge. In the aerospace domain, there is substantial overlap between commercial and military aerospace technologies, as you know. Advanced commercial technologies—such as integrated flight management systems, engines, modular avionics

architectures, cockpit displays[iii], and weather radar[iv]— can be easily repurposed for military use.[v] The United States pioneered this approach of adapting commercial technology for military systems—repurposing commercial aircraft such as the Boeing 737, 767, and 707 into highly capable military platforms including the P-8 Poseidon, KC-46 Pegasus, and airborne early warning and signals intelligence aircraft.[vi] However, this was American defense companies supporting the U.S. military. We are concerned about western aerospace companies supporting PRC military capabilities.

The PRC aggressively adopted this same approach of developing commercial technology then repurposing it for military purposes. It primarily accomplished this goal by leveraging joint ventures and partnerships with western aerospace companies.[vii] Many of these joint ventures predate the U.S. Government's recognition of the CCP threat, but now they should be reevaluated given the national security threat posed by China. Relationships between western aerospace companies and the Chinese industrial base not only transferred technology but also taught PRC firms the critical design, manufacturing, and certification know-how needed to develop China's indigenous aircraft.[viii] By bypassing early phases of aerospace development, these partnerships helped China rapidly modernize the People's Liberation Army Air Force (PLAAF), [ix] largely through one key firm: AVIC.

AVIC is not a benign commercial partner. It produces essentially all of China's domestic fixed-wing military aircraft, UAVs, and helicopters, as well as a wide range of civilian aircraft and other aviation and nonaviation products and services.[x] Unlike its western counterparts, AVIC's primary duty is not to shareholders, but to the PRC Party-state and its defense goals, particularly through Beijing's strategy of military-civil fusion [军民融合].[xi] In recognition of this role, the U.S. Treasury Department designated AVIC a Non-SDN Chinese Military-Industrial Complex Company in 2021.[xii] The Committee has concerns that Airbus's work with AVIC enables PLAAF aircraft development through AVIC.

Airbus's relationship with the PRC dates back several decades. Airbus's China CEO Xu Gang—himself a former Chinese Communist Party member who holds a degree from an entity listed university[xiii]—described Airbus as "a member of the Chinese aviation industry family."[xiv] Airbus's "long-term strategic partnership" with AVIC has been a key avenue for supporting PRC aviation goals. Airbus's AVIC partnership involves sharing core Airbus technologies, such as polymer nanocomposites with aeronautic applications,[xv] and wing technology.[xvi] This partnership includes joint ventures, supply relationships, and production of key wing technology.[xvii]

Notably, AVIC subsidiary Xi'an Aircraft Industry Group Co. (XAC) manufactures A320 wings assembled at Airbus's Tianjin facility,[xviii] however, XAC also develops and produces AVIC's H-20 bomber aircraft.[xix] For the A350, the Airbus-AVIC joint venture involved PRC companies from the early stages and allowed Chinese companies to participate in research and development, design, as well as manufacturing.[xx] These years of development culminated in Tianjin being the only city outside Europe that can deliver both single-aisle and widebody Airbus aircraft.[xxi] Some relationships, such as the one with XAC, date back to 2009, before America fully appreciated the CCP threat. However, with the U.S. pivot on the CCP, we expect Airbus to pivot with us and unwind these relationships that contribute to the PRC's aviation industrial base.

Airbus also appears to enable China's pursuit of advanced capabilities across multiple domains. It supports China's satellite program through its joint venture with the Chinese Academy of Sciences, Beijing Spot Image Co. Ltd., which has supplied satellite imagery to Chinese government agencies for over two decades.[xxii] Furthermore, Airbus's China Innovation Center, launched in 2018, focuses on areas with direct military relevance such as 5G connectivity and the Beidou satellite navigation system, a core pillar of the CCP's military-civil fusion strategy.[xxiii] While Airbus supports the civilian section of these technologies, we are worried they could be used by the PRC military. For example, the Beidou satellite system mirrors the U.S. Global Positioning System (GPS).[xxiv] GPS represents a core technology for U.S. military aircraft, vessels, vehicles, and personnel.[xxv] Developing a Chinese analog enables the PLA to integrate this critical system into its military aircraft, vessels, and other vehicles.

Announcements by Airbus helicopters illustrate our concerns. First, Airbus Helicopter's sale of models with an available military variant risks giving China a helicopter that it could easily repurpose for its military. Second, Airbus Helicopters' joint development of a heavy-lift helicopter transfers critical development know-how that could be applied to military helicopters. In 2022, Airbus Helicopters signed a USD $700 million contract with GDAT, a state-owned Chinese helicopter leasing company, for H160 helicopters.[xxvi] Airbus also sold a military variant of the same platform—the H160M "Guépard"— to the French Ministry of Armed Forces for its Light Joint Helicopter Program, with deliveries beginning in 2027.[xxvii] Selling the H160 to a state-owned Chinese company gives it a platform that could be reconfigured for military use. In the west, we operate with clear delineations between private enterprises and the government so that helicopters sold to a private company are unlikely to end up in military service. China lacks these boundaries. The helicopters that Airbus sold to GDAT can conscripted by the PRC party-state and reconfigured for military operations, with the H160M offering a model to follow.

We are most concerned about Airbus' joint development of the Z-15 helicopter with the Harbin Aircraft Industry Group,[xxviii] because the same company develops military helicopters for the Chinese military.[xxix] We understand that this development relationship dates back to 2006, before we realized the threat posed by the PRC, but it illustrates our worry. Through this arrangement, Airbus transfers key know-how and enables the People's Liberation Army to further advance its helicopter capabilities. Around the time of its announcement, in 2006, China Daily[xxx], a state-owned newspaper[xxxi], published the following mockup of the Z-15:[xxxii]



Imaginary picture of our army's Z-15 helicopter (the upper one is the naval ship-borne type, the lower one is the army type)

You can see from the caption included here that the article intended to highlight the helicopter's potential military use, and by jointly developing the helicopter, the Harbin Aircraft Group gained valuable knowledge about helicopter development that it could apply to military helicopters. Currently, PRC online commentary actively calls for adoption of the Z-15 in the PRC's military.[xxxiii]

On the civil aerospace front, Airbus's engagement enabled the PRC's leading commercial aviation company—Commercial Aircraft Corporation of China (COMAC)— to develop a plane that competes with Airbus's own products. COMAC introduced a narrow-body aircraft called the C919 that is a mirror image of Airbus's own. The CEO of Airbus's aircraft commercial business, Christian Scherer, recently conceded that COMAC's C919 "looks a bit like an Airbus" and "is not very different" than Airbus's A320.[xxxiv] However, Scherer said that the C919 is "not going to rock the boat in particular."[xxxv] This civilian development provides both the human and financial support to AVIC that can be invested in its military modernization efforts. Although AVIC holds a minority share, it holds outsized influence on COMAC's operations.[xxxvi] Much of COMAC's original leadership, employees, facilities, and technology came from AVIC and COMAC continues to draw on AVIC talent and technology.[xxxvii]

AVIC's involvement in COMAC's operations shows COMAC's strategic importance to the PRC's civil and military aerospace ambitions. Assisting COMAC, a civilian aircraft manufacturer, enables AVIC to gain access to advanced aerospace technologies and production

practices through this collaboration. AVIC can then take those same technologies and apply them to the design, production, and maintenance of military aircraft. In totality, this collaboration creates a dual-use pathway allowing AVIC to enhance the design and performance of PLAAF platforms using the technological know-how developed with Airbus on COMAC. The PRC government recognizes this fact and enables AVIC's technological development by giving it an outsized influence on COMAC operations.

We hope this letter initiates a dialogue that leads to Airbus unwinding or substantially curtailing its PRC operations. In furtherance of these goals, we request production of documents in the following categories as soon as possible but no later than August 28, 2025:[xxxviii]

1. Technical specifications of products and services developed under these partnerships, including their associated control status and number under U.S. export control regulations, even if those items are not subject to the Export Administration Regulations.
2. A complete list in native Microsoft Excel of Airbus's (including all predecessor companies) subsidiaries, joint ventures, partnerships, subcontracts, affiliates, intermediaries, licensees in the PRC, and any entities receiving technology, services, and training in the PRC, including but not limited to AVIC or any of its known subsidiaries (collectively "Ventures in the PRC").
3. A complete list in native Microsoft Excel of all technology transferred to AVIC, its subsidiaries, intermediaries, affiliates, and agents (including the PRC government).
4. All due diligence materials and internal compliance assessments relating to any joint venture or partner in China, including but not limited to those addressing potential military end-use or end-users or addressing transfers of Technical Data or Technology under U.S. export control regulations.
5. Communications with any U.S. government agency (e.g., Departments of State, Commerce, or Defense) regarding ventures in the PRC as defined in Number 2 above (*Note: this is a continuing request, meaning that subsequent disclosures made after this letter's date should be considered as included*)
6. All communications from Airbus's trade compliance (or its equivalent) team about any and all potential or actual export control violations related to AVIC and Ventures in the PRC as defined in Number 2 above.
7. All communications from Airbus's Empowered Official(s) mentioning, discussing, raising, or communicating in any way about any and all issues both potential and actual related to the PRC.
8. Copies of all export licenses mentioning or involving AVIC, its subsidiaries, intermediaries, affiliates, and agents (including the PRC government) for all Ventures in the PRC as defined in Number 2 above.
9. A complete list in native Microsoft Excel of all academic or research relationships, Airbus maintains with PRC-based universities, innovation hubs, or research centers.
10. A complete list of all CCP members who work for Airbus, its subsidiaries, intermediaries, affiliates, and agents.
11. An accounting under International Financial Reporting Standards produced in native Microsoft Excel of the profit and losses from the PRC-based joint ventures, as well as the

value of all capital contributed to AVIC, including through its subsidiaries, joint ventures, partnerships, subcontracts, affiliates, intermediaries, licensees, or any other entity related to AVIC.

12. An accounting under International Financial Reporting Standards produced in native Microsoft Excel of all profit and losses associated with the Ventures in the PRC as defined in Number 2 above.
13. Information confirming the sale of Airbus' stake in Avichina.

House Resolution 5 delegates to the Select Committee broad authority to investigate and submit policy recommendations on countering the economic, technological, security, and ideological threats of the Chinese Communist Party to the United States and allies and partners of the United States.[xxxix] The information sought here will further the Select Committee's understanding of these issues and inform its policy recommendations.

Should you have further questions, please contact the Select Committee staff at (202) 226-9678.

Sincerely,

John Moolenaar
Chairman

---

[i] House Select Comm. on the CCP, *Transcript: Hearing on "Leveling the Playing Field: How to Counter the CCP's Economic Aggression"* (May 17, 2023), https://web.archive.org/web/20250706172017/https://selectcommitteeontheccp.house.gov/sites/evo-subsites/selectcommitteeontheccp.house.gov/files/evo-media-document/5.17.23-hearing-transcript.pdf.
[ii] *Id.*
[iii] *See* Eugene Gerden, *Avionic in China: C919 Development and Future Growth,* AVIONICS INT'L (Feb. 2019), https://interactive.aviationtoday.com/avionics-in-china-c919-development-and-future-growth/.
[iv] *See* Courtney Howard, *Common Technologies for Manned and Unmanned Aircraft*, MILITARY AEROSPACE ELECTRONICS (Feb. 8, 2016), https://www.militaryaerospace.com/uncrewed/article/16709050/common-technologies-for-manned-and-unmanned-aircraft.
[v] Breaking Defense, *Military Innovation and Savings: Go Commercial*, BREAKING DEFENSE (Mar. 18, 2024), https://breakingdefense.com/2024/03/military-innovation-and-savings-go-commercial/.
[vi] *See e.g.* Gillian Rich, *Commercial Derivatives: Passenger Aircraft Finding New Life in Military Operations*, JANES (Aug. 22, 2022), https://www.janes.com/osint-insights/defence-news/air/commercial-derivatives-passenger-aircraft-finding-new-life-in-military-operations.
[vii] Roger Cliff, Chad J.R. Ohlandt, & David Yang, Ready for Takeoff: China's Advancing Aerospace Industry, RAND NATIONAL SEC. DIV. (2011), https://www.uscc.gov/sites/default/files/Research/RAND_Aerospace_Report%5B1%5D.pdf.
[viii] *Id.*

[ix] *See* Phillip C. Saunders & Joshua K. Wiseman, Buy, Build, or Steal: China's Quest for Advanced Military Aviation Technologies, *China Strategic Perspectives* (2011), https://digitalcommons.ndu.edu/cgi/viewcontent.cgi?article=1015&context=china-strategic-perspectives.
[x] J.J. Long, Thomas Corbett, & Dan Shats, *Organization and Structure of the Aviation Industry Corporation of China (AVIC)*, CHINA AEROSPACE STUDIES INST. (Jan. 2024), https://www.airuniversity.af.edu/Portals/10/CASI/documents/Research/Infrastructure/2024-01-22-avic-organization-v2.pdf.
[xi] *Id.*
[xii] U.S. DEP'T OF TREASURY, *Non-SDN Chinese Military-Industrial Complex Companies List* (June 16, 2021) https://ofac.treasury.gov/recent-actions/20210616.
[xiii] *George Xu*, AIRBUS, https://www.airbus.com/en/about-us/our-governance/george-xu (last accessed July 11, 2025); Stuart Lau, *EU Champion Airbus Has Deep Links to Chinese Military Industrial Complex, Report Says,* POLITICO (June 22, 2022), https://www.politico.eu/article/eu-champion-airbus-has-deep-links-to-chinese-military-industrial-complex-report-says/ (https://archive.ph/2wAG6).
[xiv] *Airbus Is Fully Integrated Into the Chinese Aviation Industry Family [空客正在全面融入中国航空产业大家庭],* China Civil Aviation Network (Sept. 19, 2019), http://www.caacnews.com.cn/1/88/201909/t20190919_1281765.html (https://archive.ph/RSRMV)
[xv] *Airbus Extends Technology Research With Chinese Partners*, AIRBUS (July 5, 2018), https://www.airbus.com/en/newsroom/press-releases/2018-07-airbus-extends-technology-research-with-chinese-partners.
[xvi] Huaxia, *Airbus' Second Final Assembly Line in China: What It Means for China and Europe*, XINHUA (May 6, 2024), https://web.archive.org/web/20250711140043/https://english.news.cn/20240506/36d50986a8bd4061ae4a1cdb036ff457/c.html.
[xvii] Huaxia, *Airbus' Second Final Assembly Line in China: What It Means for China and Europe*, XINHUA (May 6, 2024) (noting construction completion by end of 2025 and deepening local-for-local supply chain integration within China's Tianjin Free Trade Zone), https://web.archive.org/web/20250711140043/https://english.news.cn/20240506/36d50986a8bd4061ae4a1cdb036ff457/c.html.
[xviii] AviTrader, *Airbus and XAC Agree on A320 Family Wing Equipping Programme* (Feb. 2, 2009), https://web.archive.org/web/20250711195557/https://avitrader.com/2009/02/02/airbus-and-xac-agree-on-a320-family-wing-equipping-programme/.
[xix] *The J-20 and Yun-20 Both Come From Here. What National Heavy Weapons Have Been Produced by China's Eight Major Aviation Industrial Bases? [歼 20、运 20 都出自这，中国 8 大航空工业基地都生产了哪些国之重器？],* SINA (April 2, 2020) https://archive.ph/SqhS8.
[xx] *Airbus China CEO Xu Gang: Airbus Upgrades Comprehensive Strategic Cooperation in China's Aviation Industry [空客中国公司 CEO 徐岗：空客升级与中国航空业全面战略合作]*, SOHU (May 7, 2018), https://www.sohu.com/a/230725215_115926 (https://archive.ph/PON8k); Yang Tiehu & Zhang Jingtong, *Airbus China CEO Xu Gang: Airbus and China's Aviation Industry Will Win the Future Together [空客中国 CEO 徐岗：空中客车与中国航空业共赢未来]*, PEOPLE'S DAILY ONLINE (May 7, 2018) http://world.people.com.cn/n1/2018/0507/c1002-29969290.html (https://archive.ph/dZ176).
[xxi] Bai Xiaoyu, *Airbus Begins A350 Deliveries in China,* BELT AND ROAD PORTAL (July 22, 2021), https://web.archive.org/web/20250711153521/https://eng.yidaiyilu.gov.cn/p/180983.html.
[xxii] Gang Xu, *CEO of Airbus China: Airbus: A Solid, Reliable and Trustworthy Long-Term Partner for China,* Center for China and Globalization (Feb. 2022), http://en.ccg.org.cn/archives/76246 (https://archive.ph/xiEQv); *Airbus in China*, AIRBUS https://www.airbus.com/en/our-worldwide-presence/airbus-in-asia-pacific/airbus-in-china (https://archive.ph/FXw89) (last accessed July 11, 2025).
[xxiii] *Airbus Shenzhen Innovation Center Invested Tens of Millions of Euros in the Initial Stage, and Plans to be Compatible with the Beidou System [空客深圳创新中心初期投入千万欧元级别，计划兼容北斗系统]*, THE PAPER (Dec. 11, 2018) https://m.thepaper.cn/yidian_promDetail.jsp?contid=2725633&from=yidian (https://archive.ph/f6qwS).
[xxiv] *Beidou Navigation Satellite* [北斗导航卫星], SBG Systems, https://www.sbg-systems.com/glossary/beidou-navigation-satellite (last visited July 18, 2025).
[xxv] *The Development and Impact of GPS Technology on Military Operations*, CEVIANS (Oct. 30, 2024), https://www.cevians.com/the-development-and-impact-of-gps-technology-on-military-operations/.

[xxvi] Mark Huber, *Airbus Sells 50 H160 helicopters to China's GDAT*, AVIATION INT'L NEWS, (Apr. 7, 2023). https://www.ainonline.com/aviation-news/business-aviation/2023-04-07/airbus-sells-50-h160-helicopters-chinas-gdat.

[xxvii] Airbus, *France Orders the H160M for its Joint Light Helicopter Programme* (Dec. 22, 2021), https://www.airbus.com/en/newsroom/press-releases/2021-12-france-orders-the-h160m-for-its-joint-light-helicopter-programme.

[xxviii] *China and Europe Jointly Manufacture the Z-15 Medium Helicopter* [中欧联合制造直 15 中型直升机], CHINA DAILY (Mar. 15, 2006), https://web.archive.org/web/20250711161400/https://www.chinadaily.com.cn/jjzg/2006-03/15/content_540528.htm.

[xxix] Aerospace Online [航空产业网], *Harbin Aircraft Industry Group Co., Ltd. Has a New Supplier: Dalian Otto Automation Equipment Co., Ltd.* [哈尔滨飞机工业集团有限责任公司有了新供应商：大连奥托自动化设备有限公司] (Dec. 10, 2024), https://web.archive.org/web/20250711155752/https://www.chinaerospace.com/article/show/ef80094498a39725b12708b6f1d81f34.

[xxx] 中国日报网站

[xxxi] *China Daily*, Euro Topics, https://www.eurotopics.net/en/173210/china-daily (last visited July 18, 2025).

[xxxii] *China and Europe Jointly Manufacture the Z-15 Medium Helicopter* [中欧联合制造直 15 中型直升机], CHINA DAILY (Mar. 15, 2006), https://web.archive.org/web/20250711161400/https://www.chinadaily.com.cn/jjzg/2006-03/15/content_540528.htm.

[xxxiii] *See* Technology [科技扒一扒], *The Z-15 Finally Appeared, Meeting the Localization Goal, and Looking Forward to the Derivative Military Version* [*直 15 终于现身，满足国产化目标，期待衍生军用版本*], https://baijiahao.baidu.com/s?id=1746801998460024109 (on file with the Committee).

[xxxiv] Shreyashi Sanyal, *Airbus Says Competition from China's COMAC C919 Is 'Not Going to Rock the Boat'*, CNBC (Feb. 20, 2024), www.cnbc.com/2024/02/20/airbus-says-competition-from-chinas-comac-c919-wont-rock-the-boat.html.

[xxxv] *Id.*

[xxxvi] Scott Kennedy, *China's COMAC: An Aerospace Minor Leaguer,* CSIS Blog (Dec. 7, 2020), https://www.csis.org/blogs/trustee-china-hand/chinas-comac-aerospace-minor-leaguer.

[xxxvii] *Id.*

[xxxviii] All documents should be produced in unredacted native form with all metadata intact.

[xxxix] H. Res. 5, § 4(a), 119th Cong. (2025).