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From Bark to Bite: Team Telecom's Tougher Oversight on Foreign Access

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Overview

On January 8, 2026, the Federal Communications Commission (FCC) announced a landmark settlement with the Marlink, a satellite and ground station operator, marking the first-ever enforcement of a Team Telecom national security mitigation agreement. Initiated after a referral from the Department of Justice's National Security Division (DOJ), the investigation revealed that Marlink violated the terms of its 2022 mitigation agreement. Specifically, Marlink allowed certain non-US employees to access sensitive US communication infrastructure and customer information without seeking the required approval from DOJ. The FCC's investigation attributed these violations to an "inadequate screening procedure," noting that at least 186 non-US employees were not appropriately vetted as required. In a consent decree, Marlink agreed to pay $175,000 and implement a compliance plan to prevent future unauthorized access.

Why it matters

While the current Administration is often associated with a light touch regulatory approach, this enforcement action demonstrates that it will pursue robust regulatory enforcement when a clear national security nexus exists. By imposing on Marlink both a financial penalty and a mandatory compliance plan, the FCC and Team Telecom signaled that regulatory commitments involving critical communication infrastructure and access to sensitive customer data are binding and non-negotiable. Companies operating under such agreements should view their obligations under Team Telecom national security mitigation agreements as enforceable commitments and ensure their internal compliance procedures are thoroughly resourced.

Additional Background

Team Telecom, technically titled the Committee for the Assessment of Foreign Participation in the US Telecommunications Service Sector and formalized by Executive Order 13913, is a three-member interagency committee chaired by the Department of Justice that reviews certain FCC applications and licenses for national security and law-enforcement risks. The FCC's full press release is found here and the consent decree here.

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