



# Export Control Reform

**[www.export.gov/ecr](http://www.export.gov/ecr)**

- Improvement of national security and interoperability with Allies
- ECR tasks include:
  - Transitioning items on the State Department United States Munitions List (USML) to the Commerce Department's Commerce Control List (CCL)





# “600 Series” ECCN

9A610

CCL Category  
0-9

Product Group  
A-E

Last two characters (i.e. numbers) will generally track the Wassenaar Arrangement Munitions List (WAML)

The “600 series”  
derives its name from the 3<sup>rd</sup> character (i.e., number) of the ECCN.





# “515 Series” ECCN

9A515

CCL Category  
0-9

Product Group  
A-E

The “515 series”  
derives its name from  
the 3<sup>rd</sup> character (i.e.,  
number) of the ECCN.





# Addition of “600 Series” ECCNs

New CCL ECCNs	Related USML Category
<i>Eligible to be reported in AES beginning October 15, 2013</i>	
9A610, 9B610, 9C610, 9D610, 9E610	VIII- Aircraft
9A619, 9B619, 9C619, 9D619, 9E619	XIX- Gas Turbine Engines
<i>Eligible to be reported in AES beginning January 6, 2014</i>	
0A606, 0B606, 0C606, 0D606, 0E606	VII- Vehicles
8A609, 8B609, 8C609, 8D609, 8E609	VI- Vessels
8A620, 8B620, 8D620, 8E620	XX- Submersibles
0A617, 0B617, 0C617, 0D617, 0E617	XIII- Aux Military Equipment





# Addition of “600 Series” and 9x515 ECCNs

New CCL ECCNs	Related USML Category
<i>Eligible to be reported in AES beginning July 1, 2014</i>	
0A604, 0B604, 0D604, 0E604, 9A604, 9B604, 9D604, 9E604	IV – Missiles
0A614, 0B614, 0D614, 0E614	IX – Training Equipment
1B608, 1C608, 1D608, 1E608	V – Explosives
1A613, 1B613, 1D613, 1E613	X – Protective Equipment
<i>Eligible to be reported in AES beginning June 27, 2014 and November 10, 2014</i>	
9A515, 9B515, 9D515, 9E515	XV - Satellites







# Overview of EAR §758.1 Changes

- AES Filing is Required:
  - For all exports of items enumerated or otherwise described in paragraphs .a through .x of a 9x515 or “600 series” ECCN regardless of value or destination, including exports to Canada
  - For all exports under License Exception Strategic Trade Authorization (STA)





# Overview of EAR §758.2 Changes

Grounds for Denial for AES Post-Departure Filing include:

- Exports made under BIS License Exception Strategic Trade Authorization (STA); under authorization Validated End User (VEU); or are of 9x515 or “600 series” items
- Exports to E:1 Countries
- Exports involving parties on the Denied Persons List, Entity List, or UVL
- Exports of items licensed, items having an ECCN other than AT, or ENC items





# Overview of EAR §758.6 Changes

Required on Invoices, & BOLs, AWBs, or other export control documentation:

- The ECCN of a 9x515 or “600 series” item
- Destination Control Statement





# Ocean Bill of Lading

<b>Exporter (Name and address including ZIP code)</b> ABC, INC 1010 SECURITY AVE INDUSTRYVILLE, NY 00000		<b>Document Number</b> XX000000X	<b>Booking Number</b> XXXX000000
<b>Consigned To</b> XYZ AEROSPACE 123 MAIN SAO PAULO, BRAZIL		<b>Export References</b> REF #: X00000000 SHIPPERS REFERENCE 000000	
<b>Notify Party</b> XYZ AEROSPACE RUA VERBO DIVINO, 1500, BLOCO H, TERREO 04719-904 SAO PAULO, BRAZIL		<b>Forwarding Agent (Name and address)</b> MNO FORWARDERS 2123 ANYWHERE STREET SUITE 100 STERLING, VA 20166 US	
<b>Pre-Carriage By</b> MNO FORWARDERS		<b>Point (State) of Origin or FTZ Number</b> USA	
<b>Place of Receipt By Pre-Carrier</b> BALTIMORE, MD		<b>Domestic Routing/Export Instructions</b> ECCN: 9A610 THIS COMMODITY, TECHNOLOGY, OR SOFTWARE WAS EXPORTED FROM THE UNITED STATES IN ACCORDANCE WITH THE EXPORT ADMINISTRATION REGULATIONS. DIVERSION CONTRARY TO U.S. LAW IS PROHIBITED. AES X201310151987654	
<b>Exporting Carrier</b> ACL		<b>Type of Move</b>	
<b>Foreign Port of Unloading</b> SAO PAULO, BR			
<b>Port Loading/Export</b> MIAMI, FL			
<b>Place of Delivery By On-Carrier</b> MIAMI, FL			
<b>Number of Packages</b>	<b>Description of Commodities in Schedule B Detail</b>	<b>Gross Weight (Kilos)</b>	<b>Measurement</b>
2	OTHER PARTS, NESOI, OF MILITARY AIRPLANES/HELICOPTERS	380	

ECCN and Destination Control Statement Included



# Export Document Example 1



# New AES License Type – C60 (DY6)

- Required for .y paragraph 9x515 or “600 series” items
- AES filing is exempt for shipments \$2,500 or less or destined to Canada
- ECCNs allowed but not required to be reported.
- When a 9x515 or “600 series” ECCN is reported under C60, it must be eligible (See AESTIR, appendix F for those eligible)
- “DY6” is required in the License Number field





# AES Editing on “600 Series” ECCNs

- C30 (BIS License), C31 (SCL), C40 (TMP), C41 (RPL), C42 (GOV), C59 (STA)
  - All 49 ECCNs permitted
- C32 (NLR with control other than AT)
  - All 49 ECCNs permitted to Canada only
- C35 (LVS), C44 (TSU), C45 (BAG), C60 (DY6)
  - Only some “600-series” ECCNs are permitted





# AES Editing on 9x515 ECCNs

- C30 (BIS License), C31 (SCL), C40 (TMP), C41 (RPL), C42 (GOV), C46 (AVS), and C59 (STA)
- C32 (NLR with control other than AT)
  - 9A515.e to destinations permitted by the EAR
  - 9A515 (other than .e), 9B515, 9D515, and 9E515 permitted to Canada only
- C35 (LVS), C44 (TSU), C60 (DY6)
  - Only some 9x515 ECCNs are permitted



AES Broadcast

Broadcast #

**AES CHANGES IMPACTED BY EXPORT CONTROL REFORM IMPLEMENTATION RULE**

On Tuesday, April 16, 2013, the Department of Commerce, Bureau of Industry and Security published a final rule (<http://www.gpo.gov/fdsys/pkg/FR-2013-04-16/pdf/2013-08352.pdf>) that will become effective October 15, 2013. As a result of this rule, the following changes will be made to the Automated Export System (AES) in order for exporters and authorized agents to successfully report electronic export information in the AES.

**The Addition of "600 series" Export Control Classification Numbers (ECCN)**

ECCNs 9A610, 9A619, 9B610, 9B619, 9C610, 9C619, 9D610, 9D619, 9E610 and 9E619 will be added to the AES ECCN reference table. See the following instructions to determine which "600 series" ECCNs are eligible for certain license types. By using any of the License Exceptions or a Special Comprehensive License, you are certifying that the terms, provisions, and conditions described in the EAR have been met.

- C30 (BIS license), C31 (BIS Special Comprehensive License), C40 (TMP), C41 (RPL), C42 (GOV), and C59 (STA) – "600 series" ECCNs are eligible to the extent permitted under parts 740 and 752 of the EAR.
- C32 (NLR with a reason for control other than or in addition to AT) – All "600 series" ECCNs created under this final rule are eligible if exported to Canada. Some of these "600 series" items were previously authorized under an International Traffic in Arms Regulations (ITAR) Canadian exemption (SCA).
- C35 (LVS) – The following "600 series" ECCNs are eligible: 9A610, 9A619, 9B610, 9B619, 9C610, and 9C619.
- C44 (TSU) – The following "600 series" ECCNs are eligible: 9D610, 9D619, 9E610, and 9E619.

If the "600 series" ECCNs are reported under any other license type, AES will generate a fatal error back to the filer. With the exception of "600 series" y paragraph exports (described below), an AES filing is required for exports of items classified under "600 series" ECCNs, regardless of the value of the item or destination.

**The Addition of a New License Type (C60) for the AES Collection of "600 series" y Paragraph Exports**

A new license type (C60) DY6 will be created in AES for the reporting of items that fall under "600 series" ECCNs with a paragraph "y." If an AES filer submits electronic export information containing a "600 series" ECCN with a paragraph "y," then the filer must do so under C60. Items under the y paragraphs of the "600 series" ECCNs may be exempt from reporting in AES if their value is \$2,500 or less or they are destined for Canada.

- C60 (DY6) – Reporting an ECCN is not required, but when reported, only the following "600 series" ECCNs are eligible: 9A610, 9A619, 9B619, 9D610, 9D619, 9E610, and 9E619. When C60 is used, the filer must report DY6 in the License Number field.

**Items subject to the EAR, including "600 series" ECCNs that are licensed by the State Department under the International Traffic in Arms Regulations (ITAR)**

Under a delegation of authority, the State Department may license an item subject to the EAR on an ITAR license pursuant to new section 120.5(b) of the ITAR. If this occurs, the AES filer must report the ECCN (including "600 series" ECCNs) or the EAR99 designation in the ECCN field in AES, even if the license type is S05 (DSP-5). All other fields associated with license type S05 are required, such as registration number, significant military equipment indicator, DDTC eligible party certification indicator, USML category code, DDTC unit of measure and DDTC quantity.

A complete list of all of the AES License Type codes and reporting instructions for these types can be found at [http://www.cbp.gov/xp/cgov/trade/automated/aes/tech\\_docs/aesirjune04\\_intro/appendices/](http://www.cbp.gov/xp/cgov/trade/automated/aes/tech_docs/aesirjune04_intro/appendices/)

For questions regarding these upcoming AES changes, please contact the Bureau of Industry and Security by email at [ECR\\_AES@bis.doc.gov](mailto:ECR_AES@bis.doc.gov) or at one of the phone numbers below.

Office of Technology Evaluation (located in Washington, DC): (202) 482-2078  
Outreach and Educational Services Division (located in Washington, DC) (202) 482-4811  
Western Regional Office (located in Irvine, CA) (949) 660-0144  
Northern California branch (located in San Jose, CA) (408) 998-8806





# **EAR Items Licensed under ITAR**

State Department may license an item subject to EAR on an ITAR approval

- ITAR section 120.5(b)

AES filer must report the ECCN or EAR99 in the ECCN field

- Even for license type S05 (DSP-5)





# Contact Information

**U.S. Department of Commerce  
Bureau of Industry and Security  
Office of Technology Evaluation  
1401 Constitution Ave., NW  
Room 1093  
Washington, DC 20230  
202-482-4933  
202-482-5361 (fax)  
[ECR\\_AES@bis.doc.gov](mailto:ECR_AES@bis.doc.gov)**





# **BIS Contact Information**

- Website: [www.bis.doc.gov](http://www.bis.doc.gov)
- Exporter Services Offices:
  - Washington, D.C. (202) 482-4811
  - Southern California (949) 660-0144
  - Northern California (408) 998-8806
- Export Enforcement Offices
  - Nationwide (800) 424-2980

