

## **Slide 1: AES Changes As a Result of the Initial Implementation Rule for the Export Control Reform**

SOME OF YOU MAY NOT BE FAMILIAR WITH THE OFFICE OF TECHNOLOGY EVALUATION, AND WONDER WHY A WEBINAR ON AES CHANGES IS BEING OFFERED BY BIS'S OFFICE OF TECHNOLOGY EVALUATION AND NOT BY THE U.S. CENSUS BUREAU OR U.S. CUSTOMS AND BORDER PROTECTION.

WELL, THE OFFICE OF TECHNOLOGY EVALUATION IS THE LIAISON BETWEEN THE BUREAU OF INDUSTRY AND SECURITY AND THE CENSUS BUREAU AND U.S. CUSTOMS AND BORDER PROTECTION ON ALL AES MATTERS RELATED TO BIS. IN 2007, THE BUREAU OF INDUSTRY AND SECURITY MADE A COMMITMENT TO ENSURE THAT NEW REQUIREMENTS OF THE EXPORT ADMINISTRATION REGULATIONS ARE CONSIDERED IN THE AUTOMATED EXPORT SYSTEM, SO FILERS OF ELECTRONIC EXPORT INFORMATION, (WHAT IS REFERRED TO AS EEI), WHETHER AN EXPORTER OR FREIGHT FORWARDER COULD BE FURTHER EDUCATED THROUGH AES OF EAR CHANGES AND EXPORTERS' ADVERTENT ERRORS IN REPORTING WOULD BE MINIMIZED THROUGH ENHANCED EDITS AND VALIDATIONS, THUS MAKING THE DATA IN THE AUTOMATED EXPORT SYSTEM MORE USABLE FOR THE UNITED STATES GOVERNMENT TO MEASURE EXPORTERS' COMPLIANCE WITH LAWS AND REGULATIONS AND TRACK ILLEGAL WRONGDOINGS IN EXPORTS.

WITH THAT SAID, TODAY'S WEBINAR WILL INCLUDE A DISCUSSION ON THE CHANGES PLANNED IN THE AUTOMATED EXPORT SYSTEM IN ORDER TO ACCOMMODATE THE CHANGES IN REPORTING OF EXPORTS IMPACTED BY THE INITIAL IMPLEMENTATION RULE FOR THE EXPORT CONTROL REFORM WHICH WAS PUBLISHED ON APRIL 16TH, 2013. THIS RULE ADDS A STRUCTURE AND RELATED PROVISIONS TO CONTROL MUNITIONS ITEMS THAT THE PRESIDENT OF THE UNITED STATES HAS DETERMINED NO LONGER WARRANT CONTROL ON THE UNITED STATES MUNITIONS LIST ON THE COMMERCE CONTROL LIST. THE RULE CREATES NEW EXPORT CONTROL CLASSIFICATION NUMBERS TO CONTROL THE INITIAL TRANCHE OF ITEMS MOVING FROM THE UNITED STATES MUNITIONS LIST TO THE COMMERCE CONTROL LIST, IN PARTICULAR, THE RULE ON APRIL 16TH, 2013 WAS MORE ABOUT THE TRANSITION OF ITEMS FROM THE UNITED STATES MUNITIONS LIST CATEGORY 8, AIRCRAFT AND GAS TURBINE ENGINE-RELATED PARTS, COMPONENTS, ACCESSORIES, ATTACHMENTS, SOFTWARE AND TECHNOLOGY. ALTHOUGH THIS WEBINAR WILL BE EXTREMELY USEFUL FOR EXPORTERS WHO EXPORT THOSE ITEMS AND THEIR FREIGHT FORWARDERS, LET'S NOT FORGET THAT ADDITIONAL ITEMS UNDER OTHER UNITED STATES MUNITIONS LIST CATEGORIES ARE PLANNED TO TRANSITION TO THE COMMERCE CONTROL LIST AND WHAT AES CHANGES YOU WILL HEAR ABOUT TODAY WILL BE VERY SIMILAR TO THE AES CHANGES THAT TAKE PLACE WHEN THESE OTHER USML ITEMS MOVE TO THE COMMERCE CONTROL LIST. ONE OTHER GOAL I WANT TO MENTION TODAY, AND THIS HAS REALLY BEEN RELEVANT WITH THE AUTOMATED EXPORT SYSTEM, THE GOAL

OF THIS PRESENTATION OR ONE OF THEM IS THAT EXPORTERS AND FREIGHT FORWARDERS BEGIN TO DISCUSS HOW THEY WILL COMMUNICATE WITH ONE ANOTHER SO THAT INSTRUCTIONS FROM THE EXPORTER TO THE FREIGHT FORWARDER TO REPORT CORRECTLY IN THE AUTOMATED EXPORT SYSTEM ARE WELL-DEFINED AND CLEAR, THUS REDUCING ANY GAPS IN YOUR PROCESS.

I WANT TO REMIND EVERYONE THAT A COPY OF THIS PRESENTATION AND THE AUDIO WITH THIS WILL BE AVAILABLE ON THE BIS WEBSITE IN THE COMING DAYS AFTER THIS WEBINAR.

BEFORE BEGINNING THIS PRESENTATION, I'D LIKE TO THANK THE U.S. CUSTOMS AND BORDER PROTECTION AGENCY AND THE U.S. BUREAU OF CENSUS FOR COORDINATION IN WORKING WITH THE BUREAU OF INDUSTRY AND SECURITY AND THE STATE DEPARTMENT'S DIRECTORATE OF DEFENSE TRADE CONTROLS TO ENSURE THAT THE CHANGES THAT I WILL DISCUSS TODAY WILL BE MADE BEFORE THE EFFECTIVE DATE OF THE FINAL RULE.

### **Slide 2: Agenda Topics**

SO LET'S LOOK AT TODAY'S AGENDA.

IN THIS WEBINAR, I WILL REMIND YOU OF THE EFFECTIVE DATE OF THE REGULATIONS THAT WERE PUBLISHED ON APRIL 16TH, 2013, AND WHEN WILL BE THE EARLIEST TIME THAT AN EXPORTER, FREIGHT FORWARDER OR OTHER AES FILER CAN REPORT IN THE AUTOMATED EXPORT SYSTEM FOR AN EXPORT IMPACTED BY THE REGULATIONS.

I WILL REVIEW EXPORT ADMINISTRATION REGULATIONS PART 758.1 AND 758.2, SPECIFICALLY RELATED TO EXPORT CLEARANCE, THAT DEFINE REQUIREMENTS FOR FILING IN AES ITEMS THAT HAVE TRANSITIONED FROM THE UNITED STATES MUNITIONS LIST TO THE COMMERCE CONTROL LIST, AND MAKES CLEAR WHAT ITEMS CANNOT BE FILED IN THE AES POST DEPARTURE FILING PROGRAM AS A RESULT OF THE INITIAL IMPLEMENTATION RULES FOR EXPORT CONTROL REFORM.

I WILL ALSO REVIEW IN DETAIL THE SPECIFIC CHANGES THAT WILL BE MADE TO THE AUTOMATED EXPORT SYSTEM SO THAT EXPORTERS AND FREIGHT FORWARDERS WHO REPORT INFORMATION INTO AES OR AES DIRECT, CENSUS' INTERNET DATA COLLECTION SYSTEM, DO SO SUCCESSFULLY AND CORRECTLY, AND FOR THOSE COMPANIES OR SOFTWARE PROVIDERS WHO HAVE IN-HOUSE SOFTWARE THAT INTERFACES WITH AES, MAKE THE NECESSARY CHANGES IN TIME THAT ARE SUCCESSFUL IN THE SOFTWARE FOR THE TRANSITION TO AES WHEN THIS RULE IS EFFECTIVE IS SMOOTH.

SPECIFICALLY UNDER THE CHANGES, I WILL DISCUSS AND GIVE AN OVERVIEW OF THE AES LICENSE TYPE CODES AND HOW THEY ARE USED; I WILL TALK

SPECIFICALLY ABOUT THE CREATION OF THE NEW EXPORT CONTROL CLASSIFICATION NUMBERS EFFECTIVE IN THIS RULE AND HOW AES WILL EDIT UPON THE USE OF THESE EXPORT CONTROL CLASSIFICATION NUMBERS. I WILL EXPLAIN HOW THE DOT Y PARAGRAPH OF THE NEW EXPORT CONTROL CLASSIFICATION NUMBERS CREATED IN THIS RULE WILL BE REPORTED; AND EXPLAIN THE CHANGES MADE TO LICENSE EXCEPTIONS STRATEGIC TRADE AUTHORIZATION OR LICENSE TYPE CODE C59 IN THE AES

### **Slide 3: Effective Date of ECR Changes in AES**

SO LET'S BEGIN.

AS THE FINAL RULE STATED LAST MONTH, THE REQUIREMENTS IN THE RULES WILL BE EFFECTIVE ON APRIL 15TH, 2013.

CURRENTLY IN THE AUTOMATED EXPORT SYSTEM, BASED ON THE CENSUS BUREAU'S FOREIGN TRADE REGULATION, PREDEPARTURE FILING OF EXPORTS VARIES BY THE METHOD OF TRANSPORTATION. FOR NON-UNITED STATES MUNITIONS LIST ITEMS THAT ARE REPORTED IN THE OCEAN ENVIRONMENT, THE FILING IN AES MUST BE COMPLETED AT LEAST 24 HOURS PRIOR TO LOADING THE CARGO ON THE OCEAN CARRIER AT THE U.S. PORT WHERE THE GOODS ARE LADEN. FOR AIR SHIPMENTS, THE -- TWO HOURS BEFORE THE SCHEDULED DEPARTURE DATE OF THE AIR CARRIER. FOR RAIL SHIPMENTS, TWO HOURS PRIOR TO THE TRAIN ARRIVING AT THE U.S. BORDER TO GO FOREIGN, AND FOR TRUCK EXPORTS, ONE HOUR PRIOR TO THE TRUCK ARRIVING AT THE BORDER TO GO FOREIGN, AND FOR MAIL AND OTHER MODES, TWO HOURS PRIOR TO DEPARTURE.

YOU'RE PROBABLY ASKING YOURSELF, WHY AM I REVIEWING THE PREDEPARTURE FILING REQUIREMENTS IN THIS PRESENTATION? WELL, IT REALLY MAKES A DIFFERENCE BECAUSE IF YOU'RE READY ON OCTOBER 15TH, 2013, TO EXPORT YOUR FIRST ITEM THAT IS AFFECTED BY THIS RULE, THE SYSTEM NEEDS TO BE IN PLACE SO THAT YOU MEET YOUR PREDEPARTURE FILING REQUIREMENT.

IN ORDER FOR FILERS TO MEET THE PREDEPARTURE FILING REQUIREMENTS, WE NEED TO BE READY - CUSTOMS SERVICE, BIS AND THE CENSUS BUREAU, BEFORE OCTOBER 15TH, THE DATE WHEN THE FIRST EXPORT AFFECTED BY THESE CHANGES CAN BE MADE. TO DO THIS, WE WILL BE MOVING THE PROGRAMS INTO THE AUTOMATED EXPORT SYSTEM THE WEEKEND PRIOR TO OCTOBER 15TH. MOST LIKELY, THIS WILL BEGIN ON OCTOBER 12TH. THIS WILL GIVE AES FILERS THE ABILITY TO FILE IN THE AUTOMATED EXPORT SYSTEM BY OCTOBER 14TH, THUS MEETING THEIR 24-HOURS OR MORE OUT FOR SHIPMENTS LEAVING THE UNITED STATES ON OCTOBER 15TH OR THEREAFTER.

#### **Slide 4: Overview of EAR §758.1 Changes**

NOW I'M GOING TO DISCUSS THE OVERVIEW OF THE EXPORT ADMINISTRATION REGULATIONS 758.1 CHANGES.

I WILL ALSO BE CONTINUING WITH THE OVERVIEW OF THE EAR AND DISCUSSING 758.2 CHANGES AS WELL.

NOTE THAT SOME OF THE FOLLOWING SLIDES WILL PERTAIN TO A 600 SERIES EXPORT CONTROL CLASSIFICATION NUMBER. THESE ARE NEW EXPORT CONTROL CLASSIFICATION NUMBERS, OR ECCNS, CREATED IN THE INITIAL IMPLEMENTATION RULE FOR EXPORT CONTROL REFORM. I WILL GO OVER IN DETAIL THE FORMATTING OF THE 600 SERIES EXPORT CONTROL CLASSIFICATIONS LATER ON IN THE PRESENTATION. I DON'T WANT YOU TO GET CONFUSED AS I TALK ABOUT THESE 600 SERIES.

EAR758.1 IN THE INITIAL IMPLEMENTATION RULE FOR EXPORT CONTROL REFORM READS THAT AES FILING IS REQUIRED FOR ALL EXPORTS OF 600 SERIES ITEMS ENUMERATED IN PARAGRAPH DOT A THROUGH X OF A 600 SERIES ECCN REGARDLESS OF VALUE OR DESTINATION, INCLUDING EXPORTS TO CANADA. SO WHAT THIS REALLY MEANS IS IF YOU HAVE AN ITEM THAT IS CLASSIFIED UNDER A 600 SERIES ECCN, ONE OF THE NEW ITEMS THAT IS TRANSITIONING FROM THE UNITED STATES MUNITIONS LIST TO THE COMMERCE CONTROL LIST AND IT HAS A SUBPARAGRAPH OR A PARAGRAPH UNDER DOT A THROUGH DOT X, POST DEPARTURE FILING OR OPTION FOUR AS SOME CALL IT WILL NOT BE REQUIRED IN AES FOR THESE ITEMS. AND THAT IS BECAUSE OF THEIR SENSITIVITY.

THIS REQUIREMENT IS NO DIFFERENT FROM THE REQUIREMENT THAT FILERS CURRENTLY HAVE ON THESE ITEMS RIGHT NOW THAT ARE SUBJECT TO THE INTERNATIONAL TRAFFIC AND ARMS REGULATIONS. THE AES FILING IS ALSO A REQUIREMENT FOR EXPORTS UNDER LICENSED EXCEPTION, STRATEGIC TRADE AUTHORIZATION (STA).

FOR ITEMS TRANSITIONING FROM THE UNITED STATES MUNITIONS LIST TO THE COMMERCE CONTROL LIST ELIGIBLE FOR LICENSE EXCEPTION STA, STRATEGIC TRADE AUTHORIZATIONS, THIS IS NOT A CHANGE IN THE REPORTING REQUIREMENT YOU CURRENTLY HAVE NOW. HOWEVER, FOR FILERS WHO MAY HAVE BEEN USING STA SINCE JUNE 2011, THIS EXPANDS THE REQUIREMENTS TO ALL EXPORTS UNDER STA REGARDLESS OF VALUE.

THE BUREAU OF INDUSTRY AND SECURITY DOES NOT THINK THAT THIS NEW CHANGE REQUIRING THE STRATEGIC TRADE AUTHORIZATION LICENSE EXCEPTION EXPORTS TO BE FILED IN AES REGARDLESS OF VALUE IS GOING TO BE AN IMPACT -- TOO GREAT OF AN IMPACT TO U.S. EXPORTERS. THE REASON FOR THAT IS ALMOST HALF OF THE EXPORTS THAT WE CURRENTLY SEE UNDER LICENSED EXCEPTION STRATEGIC TRADE AUTHORIZATION REPORTED IN THE

AUTOMATED EXPORT SYSTEM ARE \$2,500 OR LESS. FILERS ARE ALREADY ADHERING TO THIS FILING REQUIREMENT. WITH THIS RULE CHANGE, STRATEGIC TRADE AUTHORIZATION AND AUTHORIZATION VALIDATED END USER BECOME THE ONLY LICENSE EXCEPTION AUTHORIZATIONS THAT ARE NOT ELIGIBLE FOR ANY OF THE CENSUS BUREAU FOREIGN TRADE REGULATIONS, ELECTRONIC EXPORT ELECTRONIC FILING EXEMPTIONS.

THIS HAS BEEN A CONFUSING TOPIC IN RECENT YEARS.

ALL OTHER LICENSE EXEMPTIONS, WHETHER IT BE LVS, GBS, BAGGAGE, GIFTS, ET CETERA, UNDER AN AES LICENSE TYPE CODE THAT RANGES FROM THE C35 ALL THE WAY TO THE C58 ARE ELIGIBLE FOR THE EEI ELECTRONIC EXPORT INFORMATION FILING EXEMPTIONS. SOME PEOPLE DON'T KNOW THAT, SO HOPEFULLY I JUST CLEARED THAT UP.

THIS REQUIREMENT IN THE EXPORT ADMINISTRATION REGULATIONS DOES MAKE 758.1 OF THE EAR AND 30.2(a)(iv) OF THE FOREIGN TRADE REGULATIONS INCONSISTENT.

30.2(a)(iv) OF THE FOREIGN TRADE REGULATIONS DESCRIBES THE TYPES OF SHIPMENTS THAT ARE NOT ELIGIBLE FOR ELECTRONIC EXPORT INFORMATION FILING EXEMPTIONS SUCH AS LOW VALUE OR DESTINATIONS TO CANADA. HOWEVER IN DISCUSSIONS I HAVE HAD PERSONALLY WITH THE U.S. CENSUS BUREAU'S FOREIGN TRADE DIVISION, THEY HAVE AGREED THEY WILL PUBLISH OVER THE SUMMER A FOREIGN TRADE REGULATION LETTER THAT POINTS 30.2(a)(iv) TO 758.1, AND THIS IS IMPORTANT SO THAT IF BIS CONTINUES TO ADD TO THE LIST OF SHIPMENTS WHERE NO EEI FILING EXEMPTIONS APPLY, CENSUS WILL NO LONGER NEED TO UPDATE THE FOREIGN TRADE REGULATION 30.2. EXPORTERS WILL JUST HAVE TO GO TO 758.1 AND REVIEW THAT INFORMATION QUICKLY.

### **Slide 5: Overview of EAR §758.2 Changes**

- THE OVERVIEW OF 758.2 CHANGES
  - GROUNDS FOR DENIAL OF AES POST DEPARTURE FILING
- UNDER 758.2 OF THE EAR, EXPORT ADMINISTRATION REGULATIONS, WE ARE ADDED TO THE LIST OF EXPORTS THAT ARE DENIED POST DEPARTURE FILING PRIVILEGES IN THE AUTOMATED EXPORT SYSTEM. ADDED TO THE LIST ARE EXPORTS UNDER THE BUREAU OF INDUSTRY AND SECURITY LICENSE EXCEPTION STRATEGIC TRADE AUTHORIZATION, EXPORTS UNDER BIS AUTHORIZATION VALIDATED END USER, AND EXPORTS UNDER A 600 SERIES EXPORT CONTROL CLASSIFICATION NUMBER.

ONCE AGAIN, THE ITEMS CURRENTLY ON THE UNITED STATES MUNITIONS LIST ARE NOT CURRENTLY ELIGIBLE FOR AES POST DEPARTURE FILING IN AES. THEREFORE, AS THESE ITEMS THAT ARE CURRENTLY ON THE USML

TRANSITION OVER TO THE COMMERCE CONTROL LIST, THEY WILL NO LONGER BE AVAILABLE FOR POST DEPARTURE FILING IN THE AUTOMATED EXPORT SYSTEM.

THERE IS ONE EXCEPTION TO THAT OF THE 600 SERIES ECCN AND THAT IS THOSE UNDER THE DOT Y PARAGRAPH.

FOR AUTHORIZATION VALIDATED END USERS, THIS IS A CORRECTION TO THE EXPORT ADMINISTRATION REGULATIONS. THE ITEMS WERE PREVIOUSLY LICENSED TO CHINA AND WERE NOT ELIGIBLE FOR POST DEPARTURE FILING. WE WERE UPDATING IN THE APRIL 16TH RULES THE REGULATION TO ENSURE THAT AES FILERS KNOW THAT THESE NEW SHIPMENTS UNDER AUTHORIZATION VALIDATED END USER ARE REPORTABLE IN AES PRE-DEPARTURE ONLY.

THERE IS NO NEED FOR CENSUS TO CHANGE THE FTR REGARDING THIS CHANGE IN THE EAR 30.4(A) OF THE FOREIGN TRADE REGULATIONS LISTS THE TYPES OF SHIPMENTS WHEN ELECTRONIC EXPORT INFORMATION SHALL ALWAYS BE TRANSMITTED PRIOR TO DEPARTURE. UNDER 4 OF THAT REGULATION, IT STATES SHIPMENTS WHERE A U.S. GOVERNMENT AGENCY REQUIRES PREDEPARTURE FILING. WITH THIS RULE, THE CENSUS BUREAU RULED THE BUREAU OF INDUSTRY AND SECURITY, IF IT WANTS TO ADD TO THE LIST OF ITEMS THAT ARE DENIED FOR AES POST DEPARTURE FILING, WE CAN JUST UPDATE PART 758.2 OF THE EXPORT ADMINISTRATION REGULATIONS.

### **Slide 6: 3 Types of Commerce Exports in AES**

HOPEFULLY THE NEXT FEW SLIDE AREN'T TOO TECHNICAL.

SOMETIMES I PUT MY PROGRAMMING HAT ON AFTER WORKING IN AES FOR SO MANY YEARS.

BUT I'M TRYING TO PUT THIS CHANGE TO THE REGULATION AND IMPLEMENTATION OF THE EXPORT CONTROL REFORM INITIATIVE INTO CONTEXT WITH THE AUTOMATED EXPORT SYSTEM. IN DOING THAT, WHAT I WANT TO EXPLAIN IS IF YOU ARE REPORTING AN ITEM SUBJECT TO THE EXPORT ADMINISTRATION REGULATIONS, MOST LIKELY YOU ARE GOING TO IDENTIFY THE CONTROL OF THAT EXPORT BY ITS AES LICENSE TYPE CODE.

THERE ARE SEVERAL CODES IN AES SUCH AS PORT CODES, SCHEDULE B CODES, EXPORT CONTROL CLASSIFICATION NUMBER CODES, AND THE AES LICENSE TYPE CODE.

THERE ARE THREE CATEGORIES THAT THE TYPE CODES FALL IN. THEY ARE EITHER UNDER A BIS LICENSE, SUCH AS C30 AND C31, THEY ARE UNDER A BIS LICENSE EXCEPTION UNDER AES LICENSE TYPE CODE C35 TO C59,

AUTHORIZATIONS OFTEN FALL UNDER THERE, OR THEY ARE UNDER THE DESIGNATION "NO LICENSE REQUIRED." THAT ALSO INCLUDES THE DOT Y PARAGRAPH OF THE 600 SERIES THAT WE'LL TALK ABOUT IN A MINUTE, AND THOSE ARE UNDER AES LICENSE TYPE CODE C32, C33, AND C60.

I'M SURE MOST OF YOU WHO ARE FAMILIAR WITH ME AND KNOW THAT I AM A STATISTICIAN BY TRADE SO I'D LIKE TO GIVE YOU SOME STATISTICS OF ANNUAL EXPORTS. 0.3% OF THE EXPORTS THAT LEAVE THE COUNTRY ARE LICENSED BY THE BUREAU OF INDUSTRY, SECURITY, AND ARE REPORTED UNDER CODE C30 AND C31.

APPROXIMATELY 10% OF EXPORTS THAT LEAVE THE COUNTRY ARE UNDER A LICENSE EXCEPTION OR AUTHORIZATION. THESE ARE ALL BY VALUE, BY THE WAY.

THEN THE REMAINING 90% OR 89.7% ARE UNDER THE DESIGNATION NO LICENSE REQUIRED.

THAT'S WHY IT'S VERY IMPORTANT AND WE STRESS THIS IN ALL OF THE OUTREACH THAT WE DO, THAT CLASSIFICATIONS ARE DONE PROPERLY TO MAKE SURE THAT YOU ARE NOT INADVERTENTLY OR PURPOSELY IMPROPERLY CLASSIFYING YOUR PRODUCT.

THE LICENSE TYPE CODES THAT I LISTED HERE ON THIS SLIDE ARE UNDER COMMERCE'S AUTHORITY, AND YOU CAN TELL BECAUSE THEY ALL BEGIN WITH THE LETTER C FOR COMMERCE.

LIKEWISE THERE ARE SIMILAR LICENSE TYPE CODES FOR THE STATE DEPARTMENT AND THEY ALL BEGIN WITH S FOR STATE.

THE LICENSE TYPE CODES THE FILERS REPORT IN AES TRIGGER A NUMBER OF EDITS ON A NUMBER OF OTHER FIELDS, IN PARTICULAR, THE EXPORT CONTROL CLASSIFICATION NUMBER AND WE'RE GOING TO TALK ABOUT THAT FOR THE REMAINDER OF THIS PRESENTATION AND THE EDITS CREATED AS A RESULT OF THE INITIAL IMPLEMENTATION RULE FOR THE EXPORT CONTROL REFORM.

#### **Slide 7 – AESDirect Screen Shot of Commodity Line Entry Screen**

HOPEFULLY A LOT OF YOU ARE FAMILIAR WITH THIS SCREEN.

THIS IS A SCREEN SHOT THAT I PULLED FROM AESDIRECT.

THIS IS AN INTERNET DATA COLLECTION SYSTEM CENSUS CREATED BACK IN 1999, THAT THE MAJORITY OF ALL THE AES FILERS USE EITHER THIS OR ITS OFFLINE VERSION TO REPORT INFORMATION TO THE FEDERAL GOVERNMENT.

THE REMAINDER OF ALL THE COMPANIES MOST LIKELY HAVE A DIRECT LINK TO U.S. CUSTOMS SERVICE TO REPORT THEIR INFORMATION.

SO THE LICENSE TYPES THAT I WAS JUST REFERRING TO, REFERRED TO AS LICENSE TYPE HERE ON THE SCREEN. THERE IT'S BLOCKED OFF THERE IN THE BLACK BOX, THESE ARE THE TYPES I'M REFERRING TO. C30 ALL THE WAY TO C60. SO THIS IS THE ILLUSTRATION FROM THAT COMMODITY LINE SCREEN OF THE AES DIRECT SYSTEM. YOU WILL NOTICE THAT THE LICENSE TYPE CODES ARE IN RED, SO IT IS A MANDATORY FIELD IN AES DIRECT AND AES, AND THAT AESDIRECT HAS A PULL DOWN FOR THE FILER TO SELECT THE APPROPRIATE AES LICENSE TYPE CODE.

**Slide 8 – AESDirect Screen Shot of Commodity Line Entry Screen with AES License Type Code Pull Down Window**

THIS IS ON THE NEXT SLIDE HERE.

IT SHOWS THAT THE LIST OF THE LICENSE TYPE CODE THAT EXPORTERS OR FREIGHT FORWARDERS WHO ARE THE AES FILERS, WHICH ONE OF THESE THEY SELECT TO DEFINE THE TYPE OF SHIPMENT, WHETHER IT BE A LICENSE, LICENSE EXEMPTION OR DESIGNATION LOAD NO LICENSE REQUIRED.

THERE ARE OTHER AGENCIES AS WELL LIKE FEDERAL OR KNEW -- COMMISSION, STATE DEPARTMENT AND FOREIGN ASSETS CONTROL ALSO HAVE CODES TO REPRESENT SHIPMENTS UNDER THEIR JURISDICTION. ONCE THE IMPLEMENTATION OF THE INITIAL RULES OR EXPORT CONTROL REFORM BECOMES EFFECTIVE AND AES CHANGES ARE MADE, THIS PULLDOWN WINDOW IN AES DIRECT WILL INCLUDE THE CODE C60, WHICH IS THE NEW LICENSE TYPE CODE IN AES THAT I'LL DISCUSS IN A FEW MINUTES THAT COLLECT -- WILL COLLECT THE INFORMATION UNDER THE DOT Y PARAGRAPH OF EXPORT CONTROL CLASSIFICATION NUMBERS IN THE 600 SERIES.

UNDER THE LICENSE TYPE DATA ELEMENT FIELDS ON THE SCREEN, YOU WILL ALSO SEE THE EXPORT CONTROL CLASSIFICATION NUMBER AND LICENSE NUMBER FIELDS.

WE WILL DISCUSS ALL OF THESE FIELDS AND HOW THE AES EDIT WILL WORK TO ENSURE THAT EXPORTERS ARE COMPLIANT WITH THIS NEW REGULATION AND THAT REPORTING IN THE AES IS COMPLETE AND ACCURATE.

**Slide 9 – The Addition of “600” Series ECCNs**

THE ADDITION OF 600 SERIES ECCN.

THE INITIAL IMPLEMENTATION RULE ESTABLISHED NEW EXPORT CONTROL CLASSIFICATION NUMBERS ON THE COMMERCE CONTROL LIST.

THESE EXPORT CONTROL CLASSIFICATION NUMBERS CAN BE FOUND IN PART 774 OF THE APRIL 16TH, 2013 RULE.

THIS RULE CREATED ACTUALLY 10 NEW EXPORT CONTROL CLASSIFICATION NUMBERS OR ECCNS REPRESENTING ITEMS IN THE CATEGORY OF AIRCRAFT,



GAS TURBINE ENGINES, RELATED PARTS, COMPONENTS, ACCESSORIES, ATTACHMENTS, SOFTWARE AND TECHNOLOGY, THAT WILL TRANSITION FROM THE UNITED STATES MUNITIONS LIST CATEGORY 8 IN THE ITAR TO THE COMMERCE CONTROL LIST. THESE 10 EXPORT CLASSIFICATION CONTROL NUMBERS OR ECCNS WILL BE ADDED TO THE AES ECCN REFERENCE TABLE. THIS TABLE, MOST COMPANIES DON'T SEE, BUT IT SITS BEHIND THE AES PROGRAM AND AS FILERS REPORT ECCNS IN THE AUTOMATED EXPORT SYSTEM, THE ECCN IS EDITED AGAINST THE AES REFERENCE TABLE. THIS IS REALLY IMPORTANT FOR THOSE COMPANIES HAVING INTERNAL SOFTWARE PROGRAMS AND THOSE SOFTWARE PROVIDERS WHO HAVE ESTABLISHED THE AES INTERFACE FOR EXPORTERS AND FREIGHT FORWARDERS.

THEY NEED TO MAKE SURE THAT THEIR AES EXPORT CONTROL CLASSIFICATION NUMBER REFERENCE TABLES ARE UPDATED WITH THESE NEW ECCNS. IF THEY'RE NOT, AND THE CLIENT GOES AND TRIES TO REPORT ONE OF THESE NEW ECCNS, MOST LIKELY THE INTERNAL SOFTWARE WILL REJECT THE TRANSACTION. THESE ECCNS, LIKE I SAID, REPRESENT THOSE ITEMS THAT ARE TRANSITIONING FROM THE ITAR'S UNITED STATES MUNITIONS LIST CATEGORY 8 TO THE COMMERCE CONTROL LIST.

IF YOU ARE A USER OF THE CENSUS BUREAU'S AES DIRECT SYSTEM OR AES PC LINKS, YOU DO NOT HAVE TO WORRY ABOUT ADDING THESE TO ANY LIST.

THESE NEW EXPORT CONTROL CLASSIFICATION NUMBERS WILL AUTOMATICALLY BE ADDED IN AES DIRECT AND PC LINK SO THAT EXPORTS REPORTED WITH ECCN WILL BE VALIDATED SUCCESSFULLY.

WHEN OTHER ITEMS FROM THE ITAR UNITED STATES MUNITIONS LIST CATEGORY TRANSITION TO THE COMMERCE CONTROL LIST, THIS LIST WILL EXPAND. BIS WILL NOTIFY AES FILERS THROUGH AN AES BROADCAST NOTICE ON THE EFFECTIVE DATES OF THE USE OF THESE NEW ECCNS.

### **Slide 10 – Anatomy of a “600 series” ECCN**

SO WE'VE BEEN REFERRING TO THE NEW ADDED ECCNS 600 SERIES ECCNS. THAT NAME IS DERIVED BY THE THIRD NUMBER OF THE EXPORT CONTROL CLASSIFICATION NUMBER.

FOR EXAMPLE, IN THE SHOWN SLIDE 9A610, THAT IS THE ECCN FOR MILITARY AIRCRAFT AND RELATED COMMODITIES.

IT IS THE 600 SERIES ECCN BECAUSE THE ITEM HAS A 6 IN THE THIRD POSITION OF THE ECCN. THE ITEMS TRANSITIONING TO THE COMMERCE CONTROL LIST WILL HAVE THIS 6 IN THE THIRD POSITION OF THE ECCN.

THIS ALLOWS FOR A UNIQUE IDENTIFICATION AND CLASSIFICATION OF ITEMS TRANSFERRED FROM THE UNITED STATES MUNITIONS LIST.

SO GOING BACK TO THE PREVIOUS SLIDE WHEN WE WERE DISCUSSING THE PREDEPARTURE FILING REQUIREMENTS FOR THESE ITEMS AND THE FACT THAT THERE ARE NO EXEMPTIONS THAT APPLY, THIS IS ONE OF THESE THINGS THAT COMPANIES CAN USE TO TRIGGER THAT THE ITEMS IS PREDEPARTURE AND

THAT IT MUST BE FILED REGARDLESS OF THE VALUE OR DESTINATION, IF IT HAS THE 6 IN THAT FIELD.

THERE ARE SOME -- REGARDING THE DOT Y ITEMS, THAT ARE NOT THE SAME AND WE'LL GO OVER THAT IN JUST A SECOND.

THE 600 SERIES ECCNS WILL ALSO CONSOLIDATE THE 13 ECCNS IN THE CCL, COMMERCE CONTROL LIST, UNDER THE -- EXPORT CONTROL REGIME'S MUNITIONS LIST. THESE ECCNS CURRENTLY END IN THE NUMBER 018 ON THE COMMERCE CONTROL LIST. THE OTHER FORMATTING OF THE ECCN IS THE SAME. THE FIRST POSITION REMAINS AS THE CATEGORY AND THE SECOND CONTINUES TO BE THE PRODUCT.

THE COMPLETE LIST OF ITEMS, DESCRIPTIONS AND ECCNS CAN BE FOUND UNDER PART 774 OF THE EXPORT ADMINISTRATION REGULATION.

IF YOU HAVE AN ITEM THAT FALLS UNDER A 600 SERIES ECCN, YOU ALSO WILL BE REQUIRED FOR EXPORT CLEARANCE REASONS TO IDENTIFY THAT ECCN ON THE INVOICE, BILL OF LADING, AIR WAYBILL OR OTHER EXPORT CONTROL DOCUMENT.

THE REQUIREMENT FOR THIS IS IN THE INITIAL IMPLEMENTATION REPORT -- PUBLISHED ON APRIL 16TH, 2013 AND PART 758.6.

THE PURPOSE OF THIS IS SO U.S. AND FOREIGN AUTHORITIES KNOW THE TYPE OF ITEM BEING EXPORTED AND CONSIGNEES AND END-USERS TO PRACTICE EXTREME DUE DILIGENCE IN MAKING SURE THESE ITEMS ARE NOT UNLAWFULLY DIVERTED.

### **Slide 11 – AES Editing on “600” Series ECCNs**

NOW WE'RE GOING TO EXPLAIN TO YOU WHY FILERS SHOULD BECOME FAMILIAR WITH THE REQUIREMENTS IN THE REGULATIONS DEFINING WHEN A 600 SERIES ECCNS ARE ELIGIBLE TO THE EXTENT -- LICENSE EXEMPTION OR NLR, IDENTIFIED IN AES BY LICENSE TYPE CODE.

TO ENSURE THAT EXPORTERS ARE COMPLIANT WITH THE USE OF THE 600 SERIES ECCNS, AES WILL BUILD IN EDITS TO REJECT THE ELECTRONIC EXPORT INFORMATION OR EEI TRANSACTIONS IF THE 600 SERIES ECCNS ARE INELIGIBLE FOR USE WITH CERTAIN LICENSE TYPE CODES IN AES

THE ERROR A USER WILL SEE IF REPORTING A SIX HUB SERIES ECCN THAT IS INELIGIBLE WITH THE PARTICULAR AES LICENSE TYPE CODE, UNFORTUNATELY THE ERROR CODE IS 666.

ECCN MUST BE FROM A -- LIST.

SO IF YOU GET ONE OF THESE, MOST LIKELY YOUR EXPORT CONTROL CLASSIFICATION NUMBER IS NOT ON AN APPROVED LIST OF ELIGIBLE ECCNS FOR THE LICENSE TYPE CODE.

LIKE I SAID PREVIOUSLY, THE RULE PUBLISHED ON APRIL 16TH IS YOUR GUIDE TO THE REQUIREMENTS FOR CLASSIFYING YOUR ITEM UNDER A 600 SERIES ITEM, AND WHAT EXCEPTIONS ARE ELIGIBLE FOR THOSE ITEMS.

YOU CAN ALSO REFER TO THE AES BROADCAST THAT WAS ISSUED ON APRIL 17TH, AFTER THE FINAL RULE FOR AES INSTRUCTION.

I'LL TALK ABOUT SOME OF THOSE SPECIFIC THINGS THAT WERE IN THAT BROADCAST FOR THOSE OF YOU THAT DID NOT GET IT. I WANT TO SAY AT THIS MOMENT, ANYONE THAT DID NOT GET THE BROADCAST THAT WANTS THE BROADCAST SENT TO THEM, WE WILL GIVE YOU THE CONTACT INFORMATION AT THE CONCLUSION OF THIS WEBINAR AND YOU CAN SEND IT TO MY OFFICE AND WE WILL RETURN TO YOU THE BROADCAST INSTRUCTIONS. WE WILL ALSO REVIEW THE AES -- TO HELP YOU UNDERSTAND THE 600 SERIES ECCN.

### **Slide 12 – AES Editing on “600” Series ECCNs**

A FEW SLIDES AGO, WE IDENTIFIED THE 10 600 SERIES ECCNS. ALL OF THOSE ECCNS ARE ELIGIBLE TO THE EXTENT PERMITTED UNDER PART 740 AND 752 OF THE EXPORT ADMINISTRATION REGULATION. UNDER THE SIX AES LICENSE TYPE CODES LISTED IN BULLET ONE. SO IF YOU HAVE A LICENSE WHICH IS UNDER LICENSE TYPE CODE IN AES C30 OR SPECIAL COMPREHENSIVE LICENSE ON C31, ALL OF THE ECCNS ARE PERMITTED TO THE EXTENT DESCRIBED IN PART 740 OR 752. THE SAME IS TRUE FOR LICENSE EXCEPTION TMP UNDER 740 OR I'M SORRY UNDER C40, RPL UNDER LICENSE TYPE C41, GOV UNDER LICENSE TYPE C42, AND FTA UNDER LICENSE TYPE C59. IN ADDITION TO THESE EDITS, THE 10 600 SERIES ECCNS ARE ELIGIBLE TO THE EXTENT PERMITTED BY THE REGULATIONS FOR NO LICENSE REQUIRED C32 ONLY IF THE EXPORT IS TO CANADA. NOW THE REASON FOR THIS IS THAT SOME OF THESE EXPORTS WERE PREVIOUSLY AUTHORIZED UNDER A CANADIAN ITAR EXEMPTION AND MOVING OVER TO THE COMMERCE CONTROL LIST, THEY WOULD BE REPORTED UNDER C32, WHICH IS THE NO LICENSE REQUIRED AES LICENSE TYPE CODE THAT HAS A REASON FOR CONTROL OTHER THAN OR IN ADDITION TO ANTITERRORISM. THE THIRD BULLET DESCRIBES THAT ONLY SIX OF THE 600 SERIES ECCNS ARE ELIGIBLE UNDER LICENSE TYPE LVS OR C35 TO THE EXTENT PERMITTED BY THE REGULATION. SO IF YOU LOOK IN PART 774 OF THE EXPORT ADMINISTRATION REGULATION ALL THE DESCRIPTIONS OF THIS 10 600 SERIES ECCNS, YOU WILL NOTICE THAT ONLY SIX OF THEM ARE ELIGIBLE FOR LVS. THAT'S WHY THE OTHER FOUR ARE NOT LISTED ON HERE. IF YOU ATTEMPT TO USE ANY OF THE OTHER FOUR, YOU WILL GET THAT ERROR MESSAGE WE DESCRIBED EARLIER. LASTLY, ONLY FOUR OF THE 600 SERIES ECCNS ARE ELIGIBLE UNDER LICENSE TYPE CODE C44 OR LICENSE EXCEPTION TSU TO THE EXTENT PERMITTED BY THE REGULATIONS.

### **Slide 13 – EXAMPLE OF INSTRUCTIONS IN AESTIR APPENDIX F FOR LVS**

HOPEFULLY THIS IS PRETTY CLEAR.

HOWEVER, IF THERE IS SOME CONFUSION, ALL OF THIS IS OUTLINED IN THE TRADE INTERFACE REQUIREMENTS IN APPENDIX F.

NOW IF YOU'RE NOT FAMILIAR WITH IT, NEVER USED IT BEFORE, THIS CAN BE A VERY HELPFUL RESOURCE, AND IT'S FOUND ON THE CUSTOMS AND BORDER PROTECTION WEBSITE AT WWW.CBP.GOV.

IF YOU CLICK ON THE TOP OF THIS SCREEN, YOU WILL CLICK ON TRADE, THEN UNDER AUTOMATED SYSTEMS, THEN UNDER THE AUTOMATED EXPORT SYSTEM, AND YOU CAN REFER TO APPENDIX F TO GET INFORMATION ON HOW THESE EDITS WORK.

ONE MORE TIME AGAIN, THE WEBSITE IS WWW.CBP.GOV, CLICK ON TRADE, THEN AUTOMATED SYSTEMS, AND THEN AUTOMATED EXPORT SYSTEMS.

THE APPENDIX F IN THIS DOCUMENTATION HAS ALREADY BEEN UPDATED AS A RESULT OF THE APRIL 16TH RULES, SO THESE WERE UPDATED THE DAY THE BROADCAST WENT OUT ON APRIL 17TH, 2013.

SO IN THIS EXAMPLE, WE HAVE A LICENSE TYPE CODE FOR LOW VALUE SHIPMENTS, WHICH IS LICENSE EXCEPTION, AND AES LICENSE TYPE CODE IS C35.

WHAT I DIDN'T SHOW YOU HERE IS, BECAUSE OF THE SPACE, IT SHOWS THE ALLOWABLE ECCNS OR ELIGIBLE ECCNS FOR LVS THAT ARE IN ACCORDANCE WITH THE PART 774 OF THE EXPORT ADMINISTRATION REGULATION.

WHAT WE DID WHEN THIS RULE WAS PUBLISHED IS WE ADDED THE SIX ELIGIBLE 600 SERIES ECCNS UNDER THE C35 LICENSE TYPE CODE SO THIS SHOULD HELP PROGRAMMERS CREATE EDITS, INTERNAL EDITS, TO MAKE SURE ONLY THE ELIGIBLE ECCNS FOR THESE LICENSE TYPES AND THESE LICENSE EXCEPTIONS ARE REPORTED IN THE AUTOMATED EXPORT SYSTEM.

**Slide 14 – EXAMPLE OF INSTRUCTIONS IN AESTIR APPENDIX F FOR GFT – WHEN 600-SERIES ARE NOT ELIGIBLE**

LIKEWISE IN CONTRAST TO THE 600 SERIES THAT ARE ELIGIBLE FOR CERTAIN LICENSE TYPE CODES, WHICH ONCE AGAIN DESCRIBE WHETHER IT'S A LICENSE, LICENSE EXCEPTION OR DESIGNATION NO LICENSE REQUIRED, AES WILL INCLUDE NEW EDITS TO PROHIBIT THE USE OF 600 SERIES ECCNS UNDER LICENSE TYPE CODES THAT ARE INELIGIBLE.

SO HERE IS AN EXAMPLE AGAIN IN APPENDIX F WHERE WE HAVE THE LICENSE TYPE CODE C43, WHICH IS FOR LICENSE EXCEPTION GFT FOR GIFT, WHERE IT SPECIFICALLY SAYS THAT THE 600 SERIES ECCNS ARE INELIGIBLE.

SO THERE IS A NOTATION IN THERE TO THE READER THAT THE ITEMS UNDER THE 600 SERIES ECCNS ARE INELIGIBLE FOR THIS LICENSE TYPE CODE.

IF THEY ARE ATTEMPTING TO USE IT, AES WILL RETURN AN INSTANTANEOUS MESSAGE BACK TO THE FILER THAT THIS IS A FATAL ERROR.

WHILE WE ARE ON THE SUBJECT, I WANT TO JUST EXPLAIN THAT BIS IS ALSO WORKING WITH CUSTOMS AND BORDER PROTECTION AND THE CENSUS BUREAU ON EXPANDING THIS EDIT SO THE DESIGNATION NO LICENSE

REQUIRED CANNOT BE USED WITH CERTAIN ECCNS HAVING CERTAIN REASONS FOR CONTROL.

THROUGH OUR ANALYSIS OF DATA, WE ALSO SEE FILERS USING NLR INADVERTENTLY WITH CCNS THAT ARE NOT ELIGIBLE WITH NO LICENSE REQUIRED.

FOR EXAMPLE, HAVING A NATIONAL SECURITY CONTROL OR ENCRYPTION CONTROL WHERE ON THE COMMERCE CONTROL CHART CAN EXPORT TO ANY COUNTRY WITH THE EXCEPTION TO CANADA WILL HAVE AN X IN THE BOX, MEANING IT NEEDS A LICENSE OR LICENSE EXCEPTION, AND NLR IS IMPOSSIBLE.

WE WOULD LIKE TO SEE A MESSAGE GO BACK TO FILERS WHEN THIS OCCURS HAVING THEM CHECK THE CLASSIFICATION OF THE ITEM FOR DESIGNATION NLR TO ENSURE IT IS ACCURATE.

ONE OF THE REASONS WE FIND THAT THIS HAPPENS IS COMPANIES DO OVERCLASSIFY THEIR ITEMS BUT STILL PUT IT UNDER DESIGNATION NO LICENSE REQUIRED.

#### **Slide 15 – Reporting Items under “600” Series .Y Paragraph ECCNs**

NOW I WANT TO TALK ABOUT THE DOT Y PARAGRAPH REPORTING OF THE 600 SERIES ECCN.

THIS IS PROBABLY TO ME, I THINK IS THE BIGGEST REPORTING CHANGE IN AES ASSOCIATED WITH -- TO FOR EXPORT CONTROL REFORM.

THIS CHANGE CREATES A BRAND NEW LICENSE TYPE CODE IN AES WHICH IS GOING TO BE DESIGNATED AS C60 AND THE SYMBOL FOR IT IS GOING TO BE DY6.

IT'S VERY SIMILAR TO THE DESIGNATION NLR, BUT WITH THIS LICENSE TYPE CODE, BIS CAN COLLECT THE INFORMATION SPECIFICALLY RELATED TO THE DOT Y PARAGRAPH ITEMS OF THE 600 SERIES.

THE DOT Y PARAGRAPH ITEMS ARE OF LESSER MILITARY SIGNIFICANCE BUT EXPORTERS AND COMPANIES NEED TO BE AWARE THAT THEY ARE STILL DESIGNED FOR MILITARY APPLICATIONS OR -- ITEM, SO RETAINING SOME DEGREE OF VISIBILITY INTO THE MOVEMENT OF THESE ITEMS IS ESSENTIAL FOR NATIONAL SECURITY.

SO THAT'S REALLY THE REASON WHY WE DID NOT PUT THESE IN THE CURRENT EXISTING NLR DESIGNATION C32 AND C33.

WE HAD TO HAVE THEM SEPARATE BECAUSE THEY ARE STILL DESIGNED FOR SOME MILITARY APPLICATIONS OR ITEMS.

AND UNLIKE OTHER 600 SERIES ITEMS IN THE REQUIREMENT IN 758.1 OF THE EAR, THE DOT Y PARAGRAPH ITEMS ARE ELIGIBLE FOR LOW VALUE FILING EXEMPTION AND FOR THE FILING EXEMPTION IF THE ITEMS ARE DESTINED TO CANADA.

SO WHAT WE WENT OVER IN ONE OF THE FIRST SLIDES DOES NOT APPLY BECAUSE THE DOT Y PARAGRAPH ITEMS UNDER THE 600 SERIES ECCN.

SO AN EXAMPLE FOR THAT IS LET'S SAY YOU HAVE AN ITEM THAT IS

CLASSIFIED UNDER 9A619.Y VALUED AT \$1,800, WHEN THIS BECOMES EFFECTIVE, YOU WILL BE EXEMPT FROM RECORDING THESE IN AES BECAUSE THE VALUE OF THE ITEM ON THE EXPORT SHIPMENT IS \$2,500 OR LESS. IF YOU HAVE A DOT Y PARAGRAPH 600 SERIES ITEM FOR \$3,000 ON AN EXPORT SHIPMENT DESTINED TO CANADA, THEY, TOO, ARE EXEMPT UNDER CANADIAN -- JUST LIKE THE NO LICENSE REQUIRED DESIGNATION C32, DY6 OR C60 DOES NOT MANDATE THAT THE ECCN BE PROVIDED, BUT IF ONE IS REPORTED, IT MUST BE A 600 SERIES ECCN HAVING ITEMS FALLING UNDER A DOT Y PARAGRAPH.

LASTLY, JUST AS OTHER AES LICENSE TYPE CODES ARE REPORTED IN AES, THE AES LICENSE TYPE ACRONYM, IN THIS CASE, DY6, MUST BE REPORTED IN THE LICENSE NUMBER FIELD WHEN C60 IS COLLECTED AND USED AS THE AES LICENSE TYPE CODE.

**Slide 16 – EXAMPLE OF INSTRUCTIONS IN AESTIR APPENDIX F FOR .Y paragraph 600-series items under AES License Type Code C60**

AGAIN THE REPORTING REQUIREMENTS FOR AES LICENSE TYPE CODE C60 OR DY6 ARE ALSO PROVIDED IN THE APPENDIX F.

CREATED IN THE INITIAL IMPLEMENTATION RULE FOR THE EXPORT CONTROL REFORM, ONLY SEVEN OF THEM HAVE A DOT Y PARAGRAPH.

SO ONLY THOSE SEVEN CURRENTLY, ECCNS WILL BE ELIGIBLE FOR THE AES LICENSE TYPE C60 OR DY6.

AND ONLY THOSE 70 CCNS, AS YOU CAN SEE HERE, ARE LISTED IN APPENDIX F UNDER C60.

JUST A REMINDER AS MORE ITEMS TRANSITION TO THE COMMERCE CONTROL LIST FROM THE UNITED STATES MUNITIONS LIST, ADDITIONAL ECCNS WITH DOT Y PARAGRAPHS WILL BE ENTERED UNDER THIS LICENSE TYPE CODE.

**Slide 17 – License Exception Strategic Trade Authorization (STA)**

I WANT TO TALK A LITTLE ABOUT THE STRATEGIC TRADE AUTHORIZATIONS. THIS IS ONE OF THE LICENSE EXEMPTIONS OR AUTHORIZATIONS UNDER AES LICENSE TYPE CODE C59.

IN JUNE 16TH, 2011, IT WAS CREATED UNDER THE EXPORT ADMINISTRATION REGULATION 740.20.

THE ONLY CHANGE MADE TO STA IN AES OR LICENSE CODE C59 THAT THE AES FILER NEEDS TO BE AWARE OF ARE THE CHANGES TO THE STA EDITS AND VALIDATIONS CONSISTENT WITH THE INITIAL IMPLEMENTATION RULE FOR EXPORT CONTROL REFORM ON APRIL 13TH -- APRIL 16TH, 2013.

SO IN JUNE 2011, LICENSE EXEMPTION STA WAS CREATED TO AUTHORIZE THE EXPORT, REEXPORT AND TRANSFER IN COUNTRY OF SPECIFIED CONTROL ITEMS TO CERTAIN DESTINATIONS WITHOUT AN EXPORT LICENSE.

TO ACCOMMODATE THE JUNE 2011 FINAL RULE, AES ESTABLISHED LICENSE-TYPE CODE STA OR C59 TO COLLECT INFORMATION ON EXPORT

SHIPMENTS UNDER STA.

JUST TO GIVE US SOME STATISTICS ON THIS, 111 EXPORTERS ARE ALREADY CURRENTLY USING THIS LICENSE EXCEPTION FOR APPROXIMATELY 1500 SHIPMENTS AT A VALUE OF \$150 MILLION.

IT IS ELIGIBLE FOR 44 COUNTRIES TO THE EXTENT PERMITTED IN THE REGULATION AND EXPORTS TO 34 OF THE 44 COUNTRIES HAVE BEEN MADE. WITH THE FINAL RULE OF APRIL 16TH, 2013, AES HAS ADDED ADDITIONAL CONTROL ITEMS IDENTIFIED BY THEIR ECCNS TO THE ELIGIBILITY LIST FOR LICENSE TYPE C59 STA.

WITH THE JUNE 16TH RULE, AES ALSO ADDED A LIST OF 44 COUNTRIES THAT ELIGIBLE UNDER LICENSE EXEMPTION STA.

36 OF THOSE COUNTRIES ARE ELIGIBLE WITH 600 SERIES ITEM EXPORTED UNDER STA.

HAVING -- OR LICENSE TYPE CODE C59.

LASTLY, EXPORTS OF 600 SERIES ITEMS UNDER LICENSE EXCEPTION STA OR LICENSE TYPE CODE C59 ARE LIMITED TO GOVERNMENT END USES ONLY.

I WANT TO MAKE SURE YOU ALL MAKE A CHANGE OR NOTE THIS.

IN THIS SLIDE, IT SAYS THAT THE 600 SERIES ITEMS UNDER STA ARE ONLY FOR GOVERNMENT END USERS.

THAT SHOULD BE END USES, NOT END USERS.

MORE INFORMATION ON THE USES OF LICENSE EXCEPTION STA CAN BE FOUND IN 740.20 OF THE EAR.

IN ADDITION, EXPORTERS CAN USE THE BIS INTERACTIVE TOOL ON THE EXPORT CONTROL WEBSITE TO OBTAIN ASSISTANCE ON THE ELIGIBILITY FOR LICENSE EXCEPTION STA.

### **Slide 18 – ECR WEBSITE SHOWING STA INTERACTIVE TOOL AND CONSOLIDATED PROSCRIBED PARTY SCREENING LIST**

SO THIS IS A SCREEN FROM THE EXPORT CONTROL REFORM WEBSITE.

IT IS [WWW.EXPORT.GOV/ECR](http://WWW.EXPORT.GOV/ECR), FOR EXPORT CONTROL REFORM.

ANYONE WHO HAS NOT BEEN FOLLOWING THE PROGRESS OF THE INITIATIVE ANNOUNCED BY THE PRESIDENT IN 2009 CAN GET UP TO DATE INFORMATION ON EXPORT CONTROL REFORM FROM THIS WEBSITE.

IN ADDITION TO INFORMATION RELATING TO THE EXPORT CONTROL REFORM IN GENERAL, THE LEFT SIDEBAR WHERE YOU SEE THE RED BOX AND THE ARROW HAS A LINK TO WHICH I'VE BLOCKED OUT FOR THE STA INTERACTIVE TOOL.

ALSO ON THIS PAGE, YOU WILL SEE BELOW THAT A LINK TO A CONSOLIDATED PARTY SCREENING LIST.

AND TO DELIST, UNVERIFIED LISTS, SANCTIONS LIST, AND THE TREASURY DEPARTMENT SPECIALLY DESIGNATED NATIONALS LIST INTO ONE CONSOLIDATED LIST.

THIS LIST IS CREATED IN TEXT OR CSV FORMATS FOR EASY OPENING IN MICROSOFT EXCEL.

UNFORTUNATELY, THERE IS NO FUZZY LOGIC ON THIS LIST, SO USING -- YOU WOULD HAVE TO USE CONTROL F OR CONTROL FIND IN EXCEL TO ACTUALLY SEARCH FOR THE PARTIES ON THE LIST.

EACH PARTY ON THE LIST HAS A SOURCE AGENCY AND A WEBSITE TO VIEW AND OBTAIN ADDITIONAL INFORMATION.

BIS MAINTAINS THE CONSOLIDATED PARTY SCREENING LIST AND OUR GOAL IS TO HAVE THE LIST UPDATED EVERY MORNING AFTER AN UPDATE TO ANY LISTS IS MADE.

THERE IS ALSO AN EMAIL NOTIFICATION LIST COMPANIES CAN SIGN ON TO EVERY TIME THE LIST IS UPDATED, AND WHEN IT IS UPDATED, YOU WILL GET AN EMAIL IF YOU'RE ON THAT LIST.

### **Slide 19 – EXAMPLE OF THE STA INTERACTIVE TOOL**

SO IF YOU CLICKED ON THE STA INTERACTIVE TOOL, IT WILL OPEN UP TO THE TOOL ITSELF AND WHAT THE TOOL DOES IS IT ASKS THE USER APPROXIMATELY 25 QUESTIONS.

AS THEY ANSWER THEM CORRECTLY, THEY PROCEED TO THE NEXT QUESTION.

### **Slide 20 – EXAMPLE 2 OF THE STA INTERACTIVE TOOL**

FOR EXAMPLE, THOSE WHO ARE NEW TO EXPORT CONTROLS, A LIST OF KEY TERMS FROM EACH SCREEN IS PROVIDED, SO IN THIS ONE HERE, IF YOU WEREN'T FAMILIAR WITH THE TERMS END USE OR END USER OR EMBARGOES, WE'VE LISTED THOSE IN THE BOX THERE AS KEY TERMS.

SOME OF YOU ARE EXPERTS ON THE WEBINAR, YOU'RE SAYING I KNOW WHAT THESE ARE, BUT YOU HAVE TO REMEMBER, NOT EVERYBODY IS AN EXPERT, SO WE ALMOST DEFINED EVERYTHING THAT WE THOUGHT A READER NEEDED A DEFINITION FOR.

SO IF A QUESTION IS ANSWERED INCORRECTLY ON THIS TOOL, THE TOOL WILL ALERT THE USER THAT THEY MOST LIKELY ARE INELIGIBLE FOR THE USE OF STA FOR EXPORTS.

THIS COULD BE BECAUSE OF THE COMMODITY BEING SHIPPED, THE COUNTRY TO WHICH IT IS SHIPPED TO OR BECAUSE THE EXPORTER IS NOT PREPARED TO COMPLY WITH THE REQUIREMENTS OF STRATEGIC TRADE AUTHORIZATION, SUCH AS GETTING A -- CONSIGNEE STATEMENT AFTER EXPORT.

SO THE USER DOES NOT HAVE TO START OVER WHEN THEY ANSWER A QUESTION INCORRECTLY.

THE USER MAY CLICK ON, AS YOU SEE HERE, THE PREVIOUS BUTTON TO REVIEW THE QUESTION AGAIN IN CASE THEY MADE AN INADVERTENT MISTAKE.

AT THE CONCLUSION OF THE TOOL IF ALL QUESTIONS ARE ANSWERED CORRECTLY, THE USER CAN PRINT OUT A SUMMARY OF THE QUESTIONS THEY ANSWERED TO REVIEW THEM ONE MORE TIME.

ALTHOUGH THIS TOOL IS VERY GOOD, IT IS ONLY A TOOL OR GUIDE,



REMEMBER THAT.

THE REQUIREMENTS IN PART 740.20 OF THE EXPORT ADMINISTRATION REGULATIONS SHOULD BE REVIEWED AS WELL.

BIS IS ACTIVE IN ENSURING THAT EXPORTERS USE STA IN COMPLIANCE WITH THE EXPORT ADMINISTRATION REGULATION AND WILL BE EXPANDING THE INSURANCE OF THIS PARTICULARLY WHEN 600 SERIES ITEMS ARE REPORTED UNDER STA.

BECAUSE OF THIS, BIS HAS ESTABLISHED AN STA COMPLIANCE PROGRAM. THIS GENERALLY CONSISTS OF BIS SENDING A LETTER TO NEW STA EXPORTERS REQUESTING THAT THE EXPORTER PROVIDES SUPPORTING DOCUMENTS REQUIRED BY PART 740.20 OF THE EXPORT ADMINISTRATION REGULATION. IN SOME INSTANCES, BASED ON THE DESTINATION IN ECCN, THE LETTER MAY ALSO REQUEST CONFIRMATION OF THE SUBPARAGRAPH LEVEL OF THE ITEM EXPORTED UNDER STA.

AFTER COMPLETION OF THE EXCHANGE OF WRITTEN CORRESPONDENTS BETWEEN BIS AND THE EXPORTER, BIS MAY ALSO LEAD AN ON-SITE DOCUMENTARY VIEW TO REVIEW EXPORTER BUSINESS PROCESSES AND ENHANCED BIS'S ABILITY TO MEASURE COMPLIANCE OF THE STA USE.

I JUST LIKE TO SAY THAT HAVING PARTICIPATED IN A COUPLE OF THESE ON SITE REVIEWS, IT IS VERY SUCCESSFUL, AND I WANT TO THANK THE COMPANIES IF ANY OF YOU ARE ON THE WEBINAR FOR COOPERATING WITH US. IT'S VERY IMPORTANT.

THE OTHER THING I ALSO WANT TO MENTION, I MENTIONED THIS IN THE INTRODUCTORY, THIS IS A GOOD TIME TO MENTION IT, IS WITH THE ADDITION OF THE 600 SERIES ECCNS AND WITH THE EXPANSION OF THE USE OF STRATEGIC TRADE AUTHORIZATION, IT IS ONCE AGAIN I WANT TO SAY VERY IMPORTANT.

THE COOPERATION AND COMMUNICATION BETWEEN FREIGHT FORWARDERS AND EXPORTERS.

I TALK TO A LOT OF FREIGHT FORWARDERS OUT THERE IN THE INDUSTRY, AND SOME OF THEM DON'T GET THE COOPERATION OF EXPORTERS IN CLASSIFYING ITEMS AND PROVIDING WHETHER IT IS A DESIGNATION NLR LICENSE OR LICENSE EXCEPTION.

A LOT OF THAT INFORMATION, SOMETIMES THEY DON'T GUESS, THANKS GOODNESS, BUT SOMETIMES THEY REALLY HAVE TO DO THEIR DUE DILIGENCE AND REALLY GO BACK TO THE EXPORTER AND TRY TO FIND OUT THE INFORMATION.

SO WORKING TOGETHER IS VERY, VERY IMPORTANT.

#### **Slide 21 – EAR Items Licensed under ITAR**

LASTLY, ONE LAST SLIDE HERE I WANT TO TALK ABOUT IS PURSUANT TO NEW SECTIONS OF THE ITAR 120.5B, THE STATE DEPARTMENT MAY, UNDER DELEGATION OF AUTHORITY, LICENSE AN ITEM SUBJECT TO THE EAR ASSISTANT SECRETARY WOLF TOUCHED ON THIS AT HIS WEBINAR A FEW

WEEKS AGO.

THERE IS GOING TO BE A REQUIREMENT IF THIS OCCURS IN THE AUTOMATED EXPORT SYSTEM.

IF IT HAPPENS THAT THIS OCCURS WHERE THE STATE DEPARTMENT UNDER THE DELEGATION OF AUTHORITY LICENSES AN ITEM SUBJECT TO THE EAR AND THAT ITEM CLASSIFIED UNDER THE 600 SERIES, WHAT WE MAY SEE, AND HOPEFULLY THIS IS WHAT WE EXPECT YOU TO REPORT, IS FOR THE DSP-5, YOU WOULD USE LICENSE TYPE CODE SO5, BUT IN THE ECCN FIELD, WE SHOULD SEE THE 600 SERIES ECCN.

ALL OF THE OTHER DATA ELEMENTS THAT YOU'RE CURRENTLY REPORTING FOR THE DSP-5 SUCH AS THE REGISTRATION NUMBER, ET CETERA, WOULD BE ALL THE SAME.

SO JUST ONCE AGAIN A REMINDER, IF THIS OCCURS, IF YOU ARE A COMPANY THAT YOUR ITEM IS NOW TRANSITIONED OVER TO THE 600 SERIES BUT IT IS LICENSED BY THE STATE DEPARTMENT UNDER A DSP-5, EVEN IF THAT LICENSE IS A DSP-5, SHOULD BE REPORTED.

SO WHAT WE SHOULD SEE IS THE SO5 LICENSE TYPE CODE AND IN THE ECCN FIELD, WE SHOULD SEE THE 600 SERIES ECCN.

THAT CONCLUDES THE PRESENTATION.

#### **Slide 22 – Contact Information for AES Questions Related to ECR**

AS I MENTIONED EARLIER, THESE CHANGES WERE OUTLINED IN AN AES BROADCAST THAT WENT OUT ON APRIL 17TH, 2013.

IT WAS ISSUED BY THE U.S. CENSUS BUREAU AND IT LISTED SEVERAL NUMBERS AT THE BUREAU OF SECURITY IF YOU HAVE SPECIFIC QUESTIONS RELATED TO THE AUTOMATED EXPORT SYSTEM AS A RESULT OF THE INITIAL IMPLEMENTATION RULE FOR EXPORT CONTROL REFORM.

I WOULD ADVISE COMPANIES THAT ARE SELF-PROGRAMMING OR PROVIDING SOFTWARE THAT INTERFACES WITH THE AES TO READ THE BROADCAST, AND IF YOU DO HAVE ANY QUESTIONS THAT I CANNOT ANSWER TODAY BECAUSE OF TIME, PLEASE FEEL FREE TO CALL ME.

A LOT OF YOU ALREADY HAVE MY NUMBER OR CALL THE BIS'S OFFICE OF TECHNOLOGY OR WE'VE SET UP A GROUP EMAIL ADDRESS LISTED HERE TO ANSWER QUESTIONS SPECIFICALLY RELATED TO AES CHANGES AFFECTED BY THE INITIAL IMPLEMENTATION RULE FOR EXPORT CONTROL REFORM.

ONCE AGAIN THAT EMAIL ADDRESS IS ECR\_AES@BIS.DOC.GOV.

I'LL LEAVE THIS UP HERE FOR JUST A WHILE.

YOU CAN TAKE THIS DOWN.

WHILE I GET A DRINK OF WATER.

THANK YOU.

#### **QUESTIONS AND ANSWERS**

I SEE THERE ARE A NUMBER OF QUESTIONS HERE.

THAT WE'RE GOING TO ANSWER.

I WAS AFRAID THAT SOME OF YOU WERE GOING TO WANT ME TO PUT ON MY CENSUS HAT TODAY AND ANSWER SOME OF THE CENSUS QUESTIONS, AND I SEE FROM MY FIRST QUESTION THAT SOMEBODY IS ASKING ABOUT FOREIGN TRADE REGULATION EXEMPTION 30.39.

DOES THE FOREIGN TRADE REGULATION 30.39 FILING EXEMPTION STILL APPLY FOR ALL 600 SERIES SHIPMENTS CONSIGNED TO THE GOVERNMENT USING EXCEPTIONS GOV?

THE ANSWER TO THAT IS -- THE ANSWER IS NO, THERE ARE NO FILING EXEMPTIONS, VALUE, DESTINATION, ET CETERA, FOR ANY OF THE ITEMS THAT ARE UNDERNEATH ECCN600 SERIES IN THE PARAGRAPHS DOT Y THROUGH DOT X.

DOT Y THROUGH DOT X.

COULD YOU PLEASE CONFIRM WHETHER -- IF DY6 IS ELIGIBLE FOR THE LOW VALUE CANADIAN FILING EXEMPTION?

YES, YOU ARE RIGHT IN THAT ASSUMPTION.

UNLIKE THE OTHER 600 SERIES ECCNS IN PARAGRAPH DOT A THROUGH DOT X, THE DOT Y PARAGRAPH ITEMS OF THOSE 600 SERIES ECCNS ARE STILL ELIGIBLE FOR THE LOW VALUE IN THE CANADIAN FILING EXEMPTION.

THE QUESTION IS SO, IF YOU DON'T HAVE A DOT Y ITEM -- NO, IF YOU HAVE A DOT Y ITEM UNDER \$1,800, YOU DON'T HAVE TO FILE IT UNDER AES?

THAT IS TRUE.

ACTUALLY IF IT'S \$2,500 OR LESS, AT THE LINE LEVEL IN YOUR SHIPMENT, AND IT'S UNDER A 600 SERIES DOT Y PARAGRAPH, IT IS EXEMPT UNDER THE LOW VALUE EXEMPTION.

THE NEXT QUESTION IS, WILL THE FULL EXPORT CONTROL CLASSIFICATION NUMBER TABLE, ECCN TABLE, BE PUBLISHED AS AN AES CODE TABLE ON AES DIRECT.

THAT'S A GREAT QUESTION.

YOU KNOW, I ACTUALLY CALLED THE AES DIRECT FOLKS IN CENSUS TODAY AND ASKED THEM IF THEY HAD A PULL-DOWN IN THE ECCN OF THE ECCN REFERENCE CODE TABLE.

CURRENTLY IT'S NOT.

IT SITS BEHIND THE SCENES AND IT WORKS TO VALIDATE TO MAKE SURE THE ECCNS REPORTED ARE ACCURATE, AND I BELIEVE THAT WAS PUT IN IN 2009 TO PREVENT MISKEYING OF ECCNS.

I TELL YOU WHAT I'M GOING TO DO.

I'M GOING TO WRITE THIS DOWN BECAUSE SINCE I'VE BEEN OVER AT THE BUREAU OF INDUSTRY AND SECURITY, THIS IS SOMETHING COMPANIES HAVE ASKED ME FOR ON THE SIDE, THEY JUST ASKED ME, THEY SAID GERRY CAN YOU SEND US A LIST OF ECCNS AT THE FIVE POSITION LEVEL, AND WE HAVE. WE JUST SENT OVER THE LIST OF THEM.

THERE'S LIKE 500 OR SOME, AND IF AES DIRECT AND THE CENSUS BUREAU ARE WILLING TO DO SO AS JUST A REFERENCE TABLE, THEN WE WILL REQUEST THAT.

SO HEATHER, THANKS FOR YOUR QUESTION.

THIS IS A VERY GOOD QUESTION, THIS NEXT ONE, BECAUSE I GET THIS ALL THE TIME AS WELL.

WHAT IS THE DIFFERENCE BETWEEN THE NLR DESIGNATION C32 AND C33 FOUND WITHIN THE EAR WITH REGARD TO -- AND OTHER REASONS FOR CONTROL.

THIS IS FROM TERRY JONES.

THE EASIEST WAY TO EXPLAIN IT IS IF YOU GO TO -- IF YOU LOOKED AT THE ECCN, AND THEN YOU HAVE A DESTINATION FOR THAT ITEM AND YOU GO TO THE COMMERCE CONTROL CHART AND THERE'S NO X IN THE BOX, AND YOU'VE ALSO ENSURED THAT IT DOESN'T HAVE AN END USE OR DOESN'T HAVE A PARTY TO THE TRANSACTION THAT REQUIRES ANY OTHER CONTROLS, IT IS NLR.

HOWEVER, IF THE REASON FOR CONTROL UNDER THAT ECCN IS IN ADDITION TO OR OTHER THAN A.T., SO IF IT SAYS A.T., THEN COMMA, N.P. FOR NUCLEAR PROLIFERATION, IF IT HAS ANY OTHER CONTROL OTHER THAN OR IN ADDITION TO A.T. AND YOU'RE USING AN NLR DESIGNATION, YOU'RE GOING TO USE THE CODE C32.

IF IT'S ONE OF THE ECCNS THAT IS SPECIFICALLY AN A.T. ITEM AND MOST -- YOU'LL KNOW THIS MOST OF THE TIME BECAUSE THE ECCN WILL END IN 991.

ALL RIGHT?

GOOD EXAMPLE OF THAT IS THE ONE IN THE AIRCRAFT AND ENGINE CATEGORY, 9A991, WHICH IS SPECIFICALLY AN A.T. CONTROLLED ITEM ONLY. IT DOES NOT HAVE ANY ADDITIONAL REASON FOR CONTROL WITH IT. WHEN YOU HAVE THOSE AND THE DESIGNATION IS SPECIFICALLY NLR, YOU THEN USE C33.

THAT'S THE REAL DIFFERENCE.

THE OTHER REASONS WHY C33 MAY BE USED IS IF THE ITEM IS NOT SUBJECT TO THE EAR AT ALL, WHERE THAT'S REALLY THE EXPORT SHIPMENTS FROM THE UNITED STATES OR PUERTO RICO OR THE OTHER TERRITORIES, THAT'S AN EXAMPLE AS WELL.

OR MOSTLY THE ITEMS ARE -- AND DEFINITELY THE ITEMS THAT ARE EAR 99 THAT ARE SPECIFICALLY NO LICENSE REQUIRED AS WELL, SO THE GENERAL MERCHANDISE TYPE OF RETAIL STUFF THAT DOESN'T REQUIRE ANY CONTROL. THOSE ARE ALSO UNDER C33.

WHAT IS THE LICENSE CODE FOR STA?

I'M ASSUMING THIS QUESTION IS REFERRING TO THE AES LICENSE TYPE CORRODE IT FOLLOWS A SEQUENCE.

IT IS C59.

IT WAS THE LAST ONE THAT WAS ADDED IN THE AUTOMATED EXPORT SYSTEM AND IT WAS ADDED WITH THE JUNE 2011 RULE.

SO IT'S C59.

REMEMBER THAT THERE ARE EDITS AND VALIDATIONS ON THAT AND YOU CAN FIND THAT ON APPENDIX F UNDER C59 OF THE AES TRADE INTERSPACE

REQUIREMENTS.

WILL THE DOT Y REQUIREMENT APPLY TO ALL ITEMS OR ONLY THE 600 SERIES? SO THE BRAND NEW LICENSE TYPE CODE IN AES D60 WHERE THE ACRONYM DY6 IS USED, THIS DOES ONLY APPLY TO THE 600 SERIES ECCNS THAT HAVE A DOT Y PARAGRAPH.

SO IF THERE'S ANOTHER ECCN OUT THERE IN THE EAR COMMERCE CONTROL LIST THAT HAS A DOT Y, YOU'RE NOT USING THE DY6-C60 FOR THAT, YOU'RE ONLY USING C60, DY6 IF IT'S A 600 SERIES WITH A DOT Y PARAGRAPH.

THAT LOOKS LIKE THAT CONCLUDES THE QUESTIONS.

HOPEFULLY THIS WAS INFORMATIVE FOR YOU.

ONCE AGAIN, IF YOU DO HAVE A DETAILED QUESTION REGARDING AES REPORTING REQUIREMENTS THAT ARE IMPACTED BY THIS RULE, PLEASE FEEL FREE TO CALL THE OFFICE OF TECHNOLOGY EVALUATION OR THE EXPORT COUNSELING CENTER AT THE EIS OR EMAIL ECR UNDERSCORE AES@BIS.DOC.GOV.

WANT TO THANK ALL OF YOU FOR YOUR TIME, AND GOOD LUCK, AND IF THERE'S ANYTHING WE CAN DO FOR YOU, PLEASE REACH OUT TO US AND WE WILL MAKE OURSELVES AVAILABLE FOR YOU.

THANK YOU AND HAVE A GREAT AFTERNOON.