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# Initial Implementation of Export Control Reform

*Note: This presentation is merely a summary of official statements and final rules published by the Departments of Commerce and State. Final rules, as well as the Export Administration Regulations and International Traffic in Arms Regulations, must be reviewed to determine the full scope of any applicable requirements.*

**Date of Last Revision: Jan 25, 2014**

# Topics



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- **ECR Background/Summary**
- **USML Framework**
- **600 Series Framework**
- **The Munitions Control Division**
- **“600 Series” License Processing**

# ECR Background



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- **In August 2009, President Obama directed the agencies involved in the U.S. export control system to conduct a broad-based review of export controls to identify additional ways to enhance U.S. national security.**
- **In April 2010, former Secretary of Defense Gates described how national security required a fundamental reform of the export control system.**

# Summary



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- Items that are now defense articles but that are no longer listed on the revised USML categories will become subject to the EAR's "600 series" ECCNs.
- Licenses from Commerce will still be required to export and reexport most 600 series items worldwide (minus Canada), unless an EAR license exception is available.
- New license exception STA will be available to authorize exports and reexports to 36 countries if (a) for ultimate end use by a government of such countries, (b) return to the US, or (c) in connection with an existing authorization.

# Status



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USML	Description	ECCNs	Status
I	Firearms	0y601	Proposed rule TBD
II	Artillery	0y602	Proposed rule TBD
III	Ammunition	0y603	Proposed rule TBD
IV	Launch Vehicles/Missiles	9y604	Final rule 1/2/14 To be effective 7/1/14
V	Explosives/Propellants	1y608	Final rule 1/2/14 To be effective 7/1/14
VI	Vessels of War	8y609	Effective 1/6/14
VII	Tanks/Military Vehicles	0y606	Effective 1/6/14
VIII	Aircraft	9y610	Effective 10/15/13
IX	Training Equipment	0y614	Final rule 1/2/14 To be effective 7/1/14

# Status



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USML	Description	ECCNs	Status
X	Personal Protective Equipment	1y613	Final rule 1/2/14 To be effective 7/1/14
XI	Electronics	3y611, 9y620	Second Proposed rule 7/25/13
XII	Fire Control/Sensors/Night Vision	TBD	Proposed rule TBD
XIII	Miscellaneous	0y617	Effective 1/6/14
XIV	Toxicological Agents	1y607	Proposed rule TBD
XV	Spacecraft/Satellites	9y515	Proposed rule 5/24/13
XVI	Nuclear	N/A	Final rule 1/2/14 To be effective 7/1/14
XVIII	Directed Energy Weapons	TBD	Proposed rule TBD
XIX	Gas Turbine Engines	9y619	Effective 10/15/13
XX	Submersible Vessels	8y620	Effective 1/6/14

# USML Framework



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- Control text for:
  - End platforms and major systems
  - Parts, components, accessories, and attachments
  - Classified articles
- Technical data (including software) and defense services
- Items subject to the EAR – new “(x)” paragraph

# Determining Changes in Jurisdiction



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- Items previously controlled under USML Category VIII
  - End item: if not listed in VIII(a), (d), (e), or (f), then moving to the CCL's new 9A610 (aircraft)
  - Part, component, accessory, or attachment: if not “specially designed” for stealth aircraft in VIII(h)(1) or listed in VIII(h)(2)-(26), then moving to CCL's new 9A610 (aircraft); if not listed in XIX(a)-(f), then moving to CCL's new 9A619 (engines)
  - Software or technology (unclassified): if commodity stays on USML, then the software and technology directly related to it stay in VIII(i) or XIX(g); otherwise moving to CCL's new 9D610/9E610 (aircraft software/technology) or 9D619/9E619 (engine software/technology)



# Order of Review

## (Supp. No. 4 to part 774)



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- **Review the USML**
  - Specifically enumerated items
  - “Catch-all” controls and ITAR definition of “specially designed”
- **If not on the USML, review the CCL**
  - Review characteristics of item to determine applicable CCL category and product group
  - Review applicable 600 series ECCNs
    - Specifically enumerated items
    - “Catch-all” controls and EAR definition of “specially designed”
  - Review applicable non-600 series ECCNs

# Definition of “Specially Designed”



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- **New definition of “specially designed” is based on a catch-and-release construct**
- **Requires answering a series of yes/no questions that lead to an objective determination whether an item is “specially designed”**
- **Definition is found in Part 772 and is described in an online decision tree tool published by BIS**

<http://www.bis.doc.gov/index.php/decision-tree-tools>

# Steps



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- To determine whether an item is “specially designed,” one answers a series of yes/no questions.
- Be sure to apply existing EAR definitions (such as “development,” “production,” and “knowledge”) and also new EAR definitions (such as for “part,” “component,” and “end item.”)
- BIS has developed a web-based decision tool, *discussed later in this presentation*, that will also assist your understanding and application of “specially designed.”

# Two New Decision Tools



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## Decision Tree Tools

- Decision Tree Tools
- CCL Order of Review
- Specially Designed
- STA
- Technical FAQs

### Decision Tree Tools



As part of the Bureau of Industry and Security's outreach efforts for the Initial Implementation of Export Control Reform final rule published on April 16, 2013, BIS has developed two new web-based decision tools that will assist users in understanding and applying the CCL Order of Review and "Specially Designed" Definition.

#### CCL Order of Review

The CCL Order of Review Decision Tool will assist users in understanding the steps to follow in reviewing the CCL.

#### Specially Designed

The "Specially Designed" Decision Tool will assist users in determining if an item will be "specially designed" under the Export Administration Regulations.

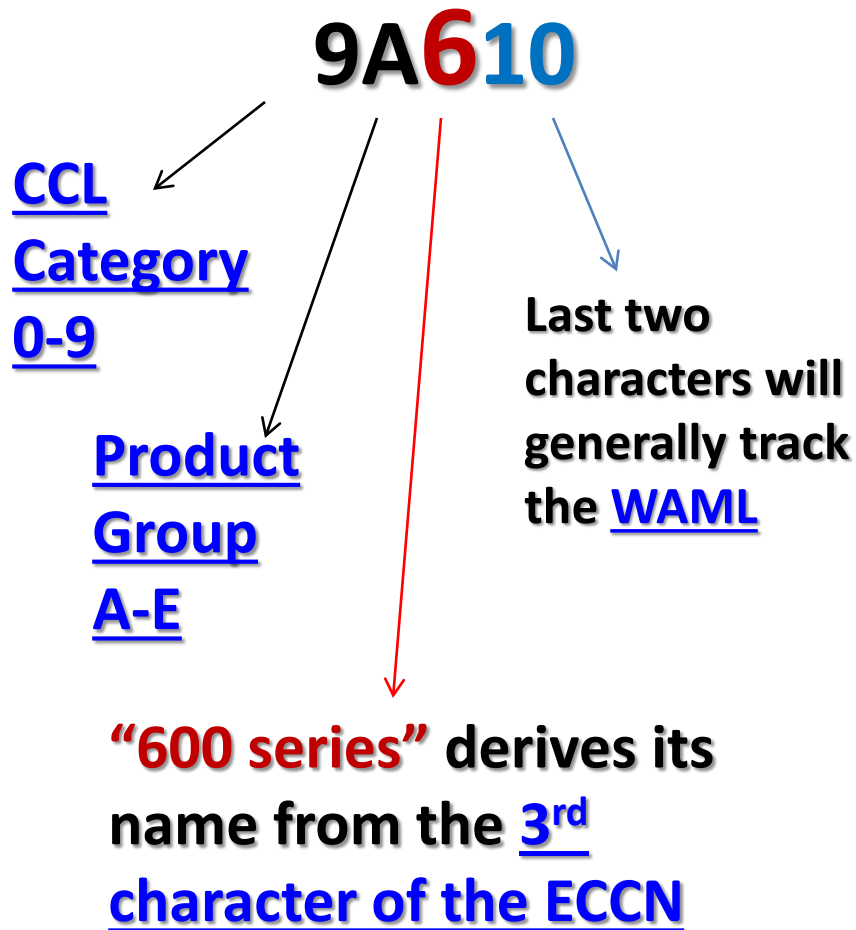
#### STA

The Strategic Trade Authorization(STA) tool will help users of the License Exception STA determine if they are eligible to use and will be in compliance with License Exception STA.

# 600 Series Framework



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Former USML items (and -018 items) listed in the “Items” paragraph.

Order of review:

- .a - .w: specifically enumerated end items, materials, parts, components, accessories, and attachments
  - Some items may be described in paragraphs that use “specially designed”
- .y: specifically described parts, components, accessories, and attachments that are “specially designed”
- .x: “specially designed” parts, components, accessories, and attachments that are not specifically enumerated

# CCL Categories



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- 0 - Nuclear Materials, Facilities and Equipment and Miscellaneous
- 1 - Materials, Chemicals, “Microorganisms,” and Toxins
- 2 – Material Processing
- 3 – Electronics
- 4 – Computers
- 5 - Telecommunications and Information Security
- 6 – Lasers and Sensors
- 7 – Navigation and Avionics
- 8 – Marine
- 9 – Propulsion Systems, Space Vehicles and Related Equipment

# Product Group



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- Each category has the same five product groups:
  - A – “End Items,” “Equipment,” “Accessories” and “Attachments,” “Parts,” “Components,” and “Systems”
  - B - Test, Inspection and “Production Equipment”
  - C – “Materials”
  - D – “Software”
  - E – “Technology”
- Terms are defined in part 772

# Reasons for Control



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- 0 – National Security
- 1 – Missile Technology
- 2 – Nuclear Nonproliferation
- 3 – Chemical and Biological
- 5 – National Security or Foreign Policy
- 6 – Wassenaar Arrangement Munitions List (WAML) or US Munitions List (USML)
- 9 – Anti-terrorism, Crime Control, Regional Stability, Short Supply, UN Sanctions, etc.



# Wassenaar Arrangement Munitions List



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- 1 - Smooth-bore weapons (less than 20 mm)
- 2 - Smooth-bore weapons (20mm or more)
- 3 - Ammunition and fuze setting devices
- 4 - Bombs, torpedoes, rockets, missiles, other explosive devices
- 5 - Fire control and related warning equip.
- 6 - Ground vehicles
- 7 - Chemical or biological toxic agents
- 8 - Energetic materials
- 9 - Vessels of war (surface or underwater)
- 10 - Aircraft, Lighter-than-air vehicles, UAV, aero-engines
- 11 - Electronic equip., spacecraft & components
- 12 - High velocity kinetic energy weapon systems
- 13 - Armoured or protective equipment, constructions and components
- 14 - Specialized equipment for military training
- 15 - Imaging or countermeasure equipment
- 16 - Forging, castings and other unfinished products
- 17 - Misc equipment, material and libraries
- 18 - Production Equipment/Components
- 19 - Directed Energy Weapon
- 20 - Cryogenic/superconductive equipment
- 21 - Software (Product Group D)
- 22 - Technology (Product Group E)

# “600 series” Example: 9A610



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## 9A610 Military aircraft and related commodities, other than those enumerated in 9A991.a (see List of Items Controlled).

Reason for Control: NS, RS, MT, AT, UN

Control(s)	Country chart (See Supp. No. 1 to part 738).
NS applies to entire entry except 9A610.u, v, w, and y.	NS Column 1
RS applies to entire entry except 9A610.y.	RS Column 1
MT applies to 9A610.u, .v, and .w	MT Column 1
AT applies to entire entry	AT Column 1
UN applies to entire entry except 9A610.y	See §746.1(b) for UN controls

.a - .x items controlled to all countries except Canada

.y items controlled to Country Group E:1 countries and China (§ 744.21)

**License Exceptions** (See Part 740 for a description of all license exceptions)

LVS: \$1500

GBS: N/A

CIV: N/A

### Special conditions for STA

STA: (1) Paragraph (c)(1) of License Exception STA (§ 740.20(c)(1) of the EAR) may not be used for any item in 9A610.a (i.e., “end item” military aircraft), unless determined by BIS to be eligible for License Exception STA in accordance with § 740.20(g) (License Exception STA eligibility requests for “600 series” end items). (2) Paragraph (c)(2) of License Exception STA (§ 740.20(c)(2) of the EAR) may not be used for any item in 9A610.

[“Items” paragraph x-y](#)

# ECCN Example: 9A610



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## List of Items Controlled

Related Controls: Military aircraft and related articles that are enumerated or otherwise described in USML Category VIII, and technical data (including software) directly related thereto, are subject to the ITAR. See ECCN 0A919 for foreign-made “military commodities” that incorporate more than a *de minimis* amount of “600 series” controlled content.

### **Items:**

a. “Military Aircraft” “specially designed” for a military use that are not enumerated in USML paragraph VIII(a).

Note 1: For purposes of paragraph .a the term “military aircraft” includes the following types of aircraft to the extent they were “specially designed” for a military use and are not enumerated in USML paragraph VIII(a): trainer aircraft; cargo aircraft; utility fixed wing aircraft; military helicopters; observation aircraft; military non-expansive balloons and other lighter than air aircraft; and unarmed military aircraft, regardless of origin or designation. Aircraft with modifications made to incorporate safety of flight features or other FAA or NTSB modifications such as transponders and air data recorders are “unmodified” for the purposes of this paragraph .a.

# ECCN Example: 9A610



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b. through e. [Reserved]

f. 'Ground equipment' "specially designed" for aircraft controlled by either USML paragraph VIII(a) or ECCN 9A610.a.

g. Aircrew life support equipment, aircrew safety equipment and other devices for emergency escape from aircraft controlled by either USML paragraph VIII(a) or ECCN 9A610.a.

h. Parachutes, paragliders, complete canopies, harnesses, platforms, electronic release mechanisms "specially designed" for use with aircraft controlled by either USML paragraph VIII(a) or ECCN 9A610.a, and "equipment" "specially designed" for military high altitude parachutists, such as suits, special helmets, breathing systems, and navigation equipment.

i. Controlled opening equipment or automatic piloting systems, designed for parachuted loads.

j. Ground effect machines (GEMS), including surface effect machines and air cushion vehicles, "specially designed" for use by a military

# ECCN Example: 9A610



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k. through s. [Reserved]

t. Military aircraft instrument flight trainers that are not “specially designed” to simulate combat. (See USML Cat IX for controls on such trainers that are “specially designed” to simulate combat.)

u. Apparatus and devices “specially designed” for the handling, control, activation and non-ship-based launching of UAVs or drones controlled by either USML paragraph VIII(a) or ECCN 9A610.a, and capable of a range equal to or greater than 300 km.

v. Radar altimeters designed or modified for use in UAVs or drones controlled by either USML paragraph VIII(a) or ECCN 9A610.a., and capable of delivering at least 500 kilograms payload to a range of at least 300 km.

w. Hydraulic, mechanical, electro-optical, or electromechanical flight control systems (including fly-by-wire systems) and attitude control equipment designed or modified for UAVs or drones controlled by either USML paragraph VIII(a) or ECCN 9A610.a., and capable of delivering at least 500 kilograms payload to a range of at least 300 km.

# ECCN Example: 9A610



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x. “Parts,” “components,” “accessories,” and “attachments” that are “specially designed” for a commodity subject to control in this ECCN or a defense article in USML Category VIII and not elsewhere specified on the USML or in ECCN 9A610.y.

*Note 1: Forgings, castings, and other unfinished products, such as extrusions and machined bodies, that have reached a stage in manufacturing where they are clearly identifiable by material composition, geometry, or function as commodities controlled by ECCN 9A610.x are controlled by ECCN 9A610.x.*

*Note 2: “Parts,” “components,” “accessories,” and “attachments” specified in USML subcategory VIII(f) or VIII(h) are subject to the controls of that paragraph. “Parts,” “components,” “accessories,” and “attachments” specified in ECCN 9A610.y are subject to the controls of that paragraph.*

# ECCN Example: 9A610



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y. Specific “parts,” “components,” “accessories and attachments” “specially designed” for a commodity subject to control in this ECCN or a defense article in USML Category VIII and not elsewhere specified in the USML or the CCL, and other aircraft commodities “specially designed” for a military use, as follows:

- y.1. Aircraft tires;
- y.2. Analog cockpit gauges and indicators;
- y.3. Audio selector panels;
- y.4. Check valves for hydraulic and pneumatic systems;
- y.5. Crew rest equipment;
- y.6. Ejection seat mounted survival aids;
- y.7. Energy dissipating pads for cargo (for pads made from paper or cardboard);
- y.8. Filters and filter assemblies for hydraulic, oil and fuel systems;
- y.9. Galleys;

# ECCN Example: 9A610



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- y.10. Hydraulic and fuel hoses, straight and unbent lines, fittings, couplings, and brackets;
- y.11. Lavatories;
- y.12. Life rafts;
- y.13. Magnetic compass, magnetic azimuth detector;
- y.14. Medical litter provisions;
- y.15. Mirrors, cockpit;
- y.16. Passenger seats including palletized seats;
- y.17. Potable water storage systems;
- y.18. Public address (PA) systems;
- y.19. Steel brake wear pads (does not include sintered mix or carbon/carbon materials);
- y.20. Underwater beacons;
- y.21. Urine collection bags/pads/cups/pumps;



# ECCN Example: 9A610



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- y.22. Windshield washer and wiper systems;
- y.23. Filtered and unfiltered cockpit panel knobs, indicators, switches, buttons, and dials;
- y.24. Lead-acid and Nickel-Cadmium batteries;
- y.25. Propellers, propeller systems, and propeller blades used with reciprocating engines;
- y.26. Fire extinguishers;
- y.27. Flame and smoke/CO2 detectors; and
- y.28. Map cases.
- y.29. 'Military Aircraft' that were first manufactured from 1946 to 1955 that do not incorporate defense articles enumerated or otherwise described on the U.S. Munitions List, unless the items are required to meet safety or airworthiness standards of a Wassenaar Arrangement Participating State; *and* do not incorporate weapons enumerated or otherwise described on the U.S. Munitions List, unless inoperable and incapable of being returned to operation.

# 600 Series and China Military End Use



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- Section 744.21 currently imposes a license requirement for exports or reexports of certain items subject to the EAR when one knows such items are intended for a military end use
- Since 600 series items are presumptively for a military end use, all 600 series items (including .y items) will require a license when destined for China – see new § 744.21(a)(2)
- Maintains ITAR status quo

# BIS Licenses



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- Free online submission system (SNAP-R); no cost associated with license application
- Default four-year validity period
- May export or reexport to *and* among end users listed on license
- No purchase order required
- No large agreements to draft or lengthy agreement guidelines to follow
- May pre-position applications prior to effective date of applicable final rule

# ITAR Exemptions and EAR Exceptions



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ITAR Exemption	EAR License Exception
§ 123.4	RPL § 740.10; TMP § 740.9(b)(2) and (b)(4)
§ 123.16(b)(2)	LVS § 740.3
§ 123.16(b)(5)	TMP § 740.9(a)(5)
§ 123.16(b)(9)	TMP § 740.9(b)(10)
§ 123.17(f)-(i)	TMP § 740.9(a)(11); BAG § 740.14(h)(2) – <i>Effective 7/1/14</i>
§ 123.19	TMP § 740.9(b)(1)
§ 125.4(b)(1)	GOV § 740.11(b)(2)
§ 125.4(b)(3)	GOV § 740.11(b)(2)
§ 125.4(b)(4)	TSU § 740.13(g)
§ 125.4(b)(5)	TSU § 740.13(a)
§ 125.4(b)(10)	TSU § 740.13(f)
§ 126.4	GOV § 740.11(b)(2)
§ 126.6(a)	GOV § 740.11(b)(2)

# MCD License Processing



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- Tiger Team Review
  - Policy review
    - Country or countries involved (including country of end use), Country Groups (e.g., regime membership or countries of concern), risk of diversion, license exception eligibility
  - Compliance review
    - Parties, bona fides, licensing history, MDE threshold, STA eligibility
  - Technical review
    - End use, quantity, classification (ECCN), technical documents

# License Application Technical Review



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- Complete description of item(s)
  - use ECCN parameters
  - provide technical specifications
- Full description of end use (be specific)
- Letter of Explanation (recommended)
  - provide greater detail on proposed transaction, parties, item(s) and prior transactions (DDTC or BIS)
  - be proactive by anticipating and answering questions in advance, as much as possible.
- Applications should be **t** true, **a** accurate and **c** complete **(TAC)**.
- See EAR part 748 (Application) and its supplements

# Transition Issues



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- Final rules moving items from USML to CCL will have 180-day delay in effective date:
- Effective date for USML Categories VIII and XIX and ECCNs 9Y610 and 9Y619 was October 15, 2013;
- Effective date for USML Categories VI, VII, XIII, and XX, and ECCNs 0Y606, 0Y617, 8Y609, and 8Y620 was January 6, 2014
- Effective date for USML Categories IV, V, IX, X, and XI, and ECCNs 0Y604, 0Y6141, 1Y608, 1Y613, and 9Y604 is July 1, 2014.

# Commodity Jurisdictions



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- CJs that determined an item to be USML may be superseded by the list revisions
- CJs that determined an item to be subject to the EAR remain valid
  - If CJ determined to be subject to EAR and not identified at that time on the CCL = EAR99 (unless later enumerated on the CCL or USML)
  - If CJ determined to be subject to EAR and not identified at that time in a -018 ECCN = not 600 series



# Transition Options



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- Transactions authorized prior to effective date
  - Grandfather existing DDTC licenses, agreements, or other approvals beyond effective date of final rule per DDTC transition plan
  - Maintain DDTC approval until effective date but pre-position BIS license application or utilize license exception or NLR designation upon effective date

# Transition Options



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- Transactions after effective date
  - Obtain BIS license, use license exception, or use NLR designation when eligible
  - Obtain DDTC license, agreement, or other approval if eligible under § 120.5(b) of the ITAR

# Grandfathering DDTC Approvals



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- General Order No. 5 allows for continued use of DDTC approvals for items subject to the EAR if in accordance with DDTC's transition plan.
- After applicable effective date, if choose to utilize BIS authorization rather than DDTC approval, must terminate the DDTC approval before using BIS authorization.

# Grandfathering DDTC Approvals

	Contains only items transitioning to CCL	Contains both transitioning and non-transitioning items
DSP-5	May use for up to 2 years after effective date of transition unless license expires or returned. May amend after effective date on case-by-case basis.	Valid for all items until expiration. May amend after effective date on case-by-case basis.
DSP-61 DSP-73	Valid until expiration. May amend after effective date on case-by-case basis.	
TAA MLA WDA	May use for up to 2 years after effective date of transition unless agreement expires. May amend after effective date on case-by-case basis.	May use for up to 2 years after effective date of transition unless agreement expires. Agreement may be kept valid beyond the 2-year period by submitting amendment to authorize transitioning items under § 120.5(b).

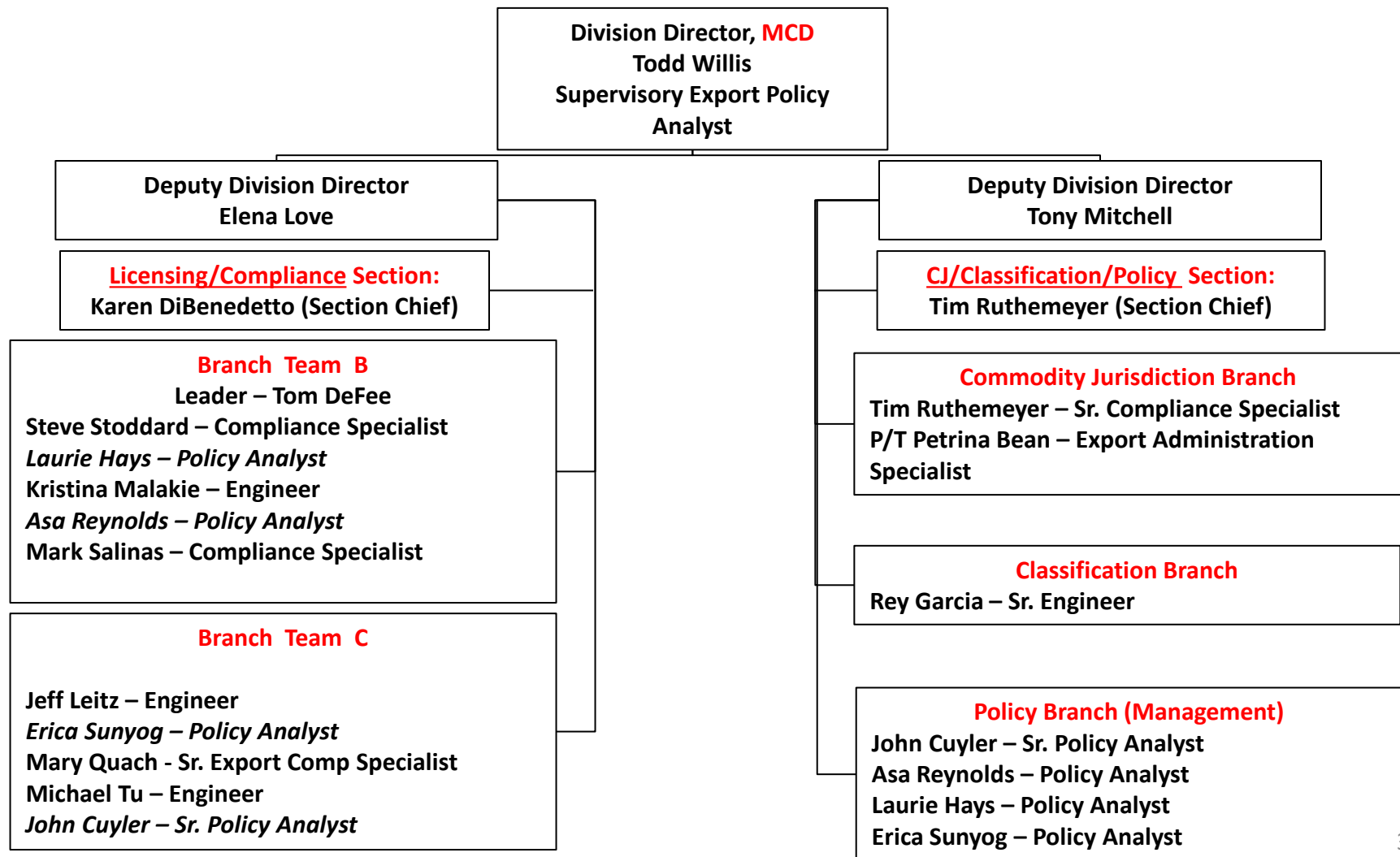


See DDTC's transition plan for full details.



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# Munitions Control Division



# Contact Information



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## **600 Series Licensing and Classification Requests: Munitions Control Division**

- Director: Todd Willis, [todd.willis@bis.doc.gov](mailto:todd.willis@bis.doc.gov)
- Deputy Directors: Elena Love, [elena.love@bis.doc.gov](mailto:elena.love@bis.doc.gov); Anthony Mitchell, [anthony.mitchell@bis.doc.gov](mailto:anthony.mitchell@bis.doc.gov)

## **Technical Product Questions**

- Aircraft, gas turbine engines, or ground vehicles: Gene Christiansen, [gene.christiansen@bis.doc.gov](mailto:gene.christiansen@bis.doc.gov); Jeff Leitz, [jeffrey.leitz@bis.doc.gov](mailto:jeffrey.leitz@bis.doc.gov)
- Surface or submersible vessels: Alex Lopes, [alexander.lopes@bis.doc.gov](mailto:alexander.lopes@bis.doc.gov); Jeff Leitz, [jeffrey.leitz@bis.doc.gov](mailto:jeffrey.leitz@bis.doc.gov)
- Materials, miscellaneous items, energetic materials, or protective equipment: Mike Rithmire, [michael.rithmire@bis.doc.gov](mailto:michael.rithmire@bis.doc.gov)
- Military training equipment: Dan Squire, [daniel.squire@bis.doc.gov](mailto:daniel.squire@bis.doc.gov)
- Missiles/launch vehicles: Dennis Krepp, [dennis.krepp@bis.doc.gov](mailto:dennis.krepp@bis.doc.gov)

## **Regulatory Interpretation and Transition Guidance**

- Regulatory Policy Division: [rpd2@bis.doc.gov](mailto:rpd2@bis.doc.gov) , 1-202-482-2440
- Office of the Assistant Secretary for Export Administration: [steven.emme@bis.doc.gov](mailto:steven.emme@bis.doc.gov)

## **Outreach Assistance: Outreach and Educational Services Division**

- Director: Rebecca Joyce, [OESDseminar@bis.doc.gov](mailto:OESDseminar@bis.doc.gov), 1-202-482-4811
- Western Regional Office Director: Michael Hoffman, 1-949-660-0144