



SIA – 2026 SUMMER BASICS CONFERENCE

OVERVIEW OF EXPORT CONTROL REGIMES & REGULATIONS

Tom Donovan

Senior Director, Global Trade Management
Northrop Grumman Corporation

Joshua Richter

Senior Director, Trade Compliance
Leonardo DRS



Getting you started – What we will cover

- Laws and regulations
 - Why do we have export controls?
- USG Review
- Some basics to get you started
 - Definitions
 - Processes
- Review of the Upcoming Panels
- Introduction of Scenario

Why Am I Here?



It's the Law



Supports National Security and Foreign Policy initiatives



Critical business enabler

- Non-compliance can be costly
- Non-compliance puts our nation and our allies at risk
- Confidence, quicker approvals, quicker decision-making



Export Control Laws

- Developed and implemented to control the release of strategically important technologies and products
- Through these laws the U.S. Government...
 - Limits weapons proliferation
 - Prevents our adversaries from obtaining capabilities that threaten U.S. National Security
 - Ensures U.S. Forces maintain cutting edge technologies, equipment and know-how
 - Ensures our allies maintain state of the art technologies and equipment
 - Supports U.S. foreign policy initiatives (human rights, trade sanctions, embargoes)
 - Promote Interoperability with Allies





Arms Export Control Act (AECA)

- Governs Direct Commercial Sales and Foreign Military Sales and requires:
 - Registration of Manufacturers, Exporters and Brokers of defense articles
 - Licensing of exports
 - USG approval of “end-use”
- Broad Authority to Approve, Deny, Suspend, Revoke and Halt exports
- End-Use and Retransfer Assurances
- Establishes Fines and Penalties



International Traffic In Arms Regulations (ITAR)

- Implements Direct Commercial Sales portion of the AECA

[ITAR Part 120 - Purpose and Definitions](#)

[ITAR Part 121 - The United States Munitions List](#)

[ITAR Part 122 - Registration of Manufacturers and Exporters](#)

[ITAR Part 123 - Licenses for the Export of Defense Articles](#)

[ITAR Part 124 - Agreements, Off-Shore Procurement and Other Defense Services](#)

[ITAR Part 125 - Licenses for the Export of Technical Data and Classified Defense Articles](#)

[ITAR Part 126 - General Policies and Provisions](#)

[ITAR Part 127 - Violations and Penalties](#)

[ITAR Part 128 - Administrative Procedures](#)

[ITAR Part 129 - Registration and Licensing of Brokers](#)

[ITAR Part 130 - Political Contributions, Fees and Commissions](#)



Export Control Reform Act of 2018 (ECRA) and the Export Administration Regulations (EAR)

- ECRA provides the permanent statutory authority for the EAR
- “Export Controls Act of 2018” (ECA) or Part I of ECRA, provides the authority for the administration of the export controls by BIS
- The EAR primarily control the export, reexport, and transfer of commercial, dual-use and less sensitive military items

Title	Date Last Modified
Table of Contents for the EAR	2017-04-24
Commerce Control List Index	2017-08-15
CCL Categories 0-9	2017-08-15
Category 0 - Nuclear Materials Facilities & Equipment [and Miscellaneous Items]	2018-01-08
Category 1 - Materials Chemicals Microorganisms and Toxins	2017-08-15
Category 2 - Materials Processing	2017-12-27
Category 3 - Electronics Design Development and Production	2017-08-15
Category 4 - Computers	2017-08-25
Category 5 Part 1 - Telecommunications	2017-08-15
Category 5 Part 2 - Information Security	2017-08-15
Category 6 - Sensors and Lasers	2017-08-15
Category 7 - Navigation and Avionics	2017-08-15
Category 8 - Marine	2018-01-08
Category 9 - Aerospace and Propulsion	2017-12-27
Legal Authority for the Export Administration Regulations	2017-06-26
Part 730 - General Information	2017-01-04
Part 732 - Steps for Using the EAR	2017-12-27
Part 734 - Scope of the Export Administration Regulations	2017-12-27
Part 736 - General Prohibitions	2016-03-16
Part 738 - Commerce Control List Overview and the Country Chart	2017-12-27
Supplement No. 1 to Part 738 - Commerce Country Chart	2016-11-04
Part 740 - License Exceptions	2017-12-27

Export Approval

- Each export application is reviewed for:
 - National Security concerns
 - Foreign Policy objectives
 - Proliferation concerns
 - Regional stability
 - Other





USG Players In Export Control

Regulators or Reviewers

US Department of State
• Defense Trade Controls



US Department of Commerce
• Bureau of Industry Security



US Department of Defense
• Defense Technology Security Administration



US Congress

White House – National Security Council (NSC)

Dept Homeland Security – US Customs (CBP)

NASA

Dept of Energy

Dept of Justice – Alcohol Tobacco and Firearms

Dept of the Treasury – Office of Foreign Asset Controls (OFAC)

Intelligence Community



Primary Agencies for Regulating Exports

	US Department of State	US Department of Commerce
Department/ Agency	Directorate of Defense Trade Controls (DDTC)	Bureau of Industry and Security (BIS)
Law	Arms Export Control Act (AECA)	Export Control Reform Act of 2018 (ECRA)
Regulation	International Traffic in Arms Regulations (ITAR)	Export Administration Regulations (EAR)
Commodity List	US Munitions List (USML)	Commerce Control List (CCL) Export Control Classification Number (ECCN)
Scope	Military	Military, Dual Use, Commercial
General Approach	Narrow area of control; Broad licensing requirement	Broad area of control; Narrow licensing requirement
Registration requirement?	Yes	No
Registration Fee?	Yes	No
Automation System	DECCS	SNAP-R



US Regulatory Agency Information

Additional information about the regulatory agencies can be found at the following websites:

- Directorate of Defense Trade Controls (DDTC):
https://www.pmddtc.state.gov/ddtc_public
- Bureau of Industry and Security (BIS):
<https://www.bis.gov/>
- Defense Technology Security Administration (DTSA):
<https://www.dtsa.mil/SitePages/about-dtsa/directorates/export-control/default.aspx>



What Agency Do You Deal With?

IT DEPENDS

- What is the Jurisdiction and Classification of your product?
 - Jurisdiction: Different USG agencies have control over different types of products, and associated technology or technical data.
 - Classification: Depending on Jurisdiction, can be ECCN or USML Category
 - Also includes HTS or Schedule B.

Knowing the Jurisdiction of your Export is Critical
If you get the jurisdiction wrong, every export will be a violation!



Basic Overview and Key Definitions

What Is Controlled For Export?

Commodities



Software



Technology



Technical Data



Defense Services





How an “Export” Occurs



- Tangible:
 - Tangible shipments
 - Hand-carrying products
 - Re-export of US goods
- Intangible:
 - Electronic transmission (e.g., e-mail, messaging/apps, facsimile)
 - Oral conversations of a technical nature (e.g., Technical presentations or demonstrating products at a trade show)
 - Publishing technical articles
 - Foreign person access to technical information on computer servers
- Providing a “Defense Service” to a foreign person



Definitions

Export (ITAR) (covers tangible & intangible)

- Actual shipment or transmission, including sending or taking, a defense article out of US
- Releasing or otherwise transferring technical data to a foreign person
- Transferring registration, control or ownership
- Releasing or otherwise transferring a defense article to an Embassy
- Performing a defense service

Export (EAR) (covers tangible & intangible)

- Actual shipment or transmission, including sending or taking, an item out of US, in any manner;
- Releasing/otherwise transferring “technology” or “source code” to a foreign person (in the U.S. – “deemed export”)
- Transferring by a person in the United States of registration, control, or ownership of:
 - A spacecraft subject to the EAR that is not eligible for export under License Exception STA to a person in or a national of any other country; or
 - Any other spacecraft subject to the EAR to a person in or a national of a Country Group D:5 country.

Definitions

- Or simply put...
 - “The *transfer* of anything “controlled” to a “FOREIGN PERSON” by any means, anywhere, anytime, or the provision of a *service* related to a defense article”



Definitions

Defense Article (*ITAR*)

- Any item or technical data listed on the U.S. Munitions List
- Includes technical data recorded or stored in any physical form, models, mockups, or other items that reveal technical data...
- Includes forgings, castings, and other unfinished products, such as extrusions and machined bodies, that are clearly identifiable as defense articles

Items (*EAR*)

- Means commodities, software, and technology.
- When the EAR intend to refer specifically to commodities, software, or technology, the text will use the specific reference.





Definitions

Defense Service (*ITAR*) The furnishing of assistance (including training) to foreign persons in the...

- | | | |
|----------------|---------------|--------------------|
| - Design | - Manufacture | - Testing |
| - Development | - Production | - Repair |
| - Engineering | - Assembly | - Maintenance |
| - Modification | - Operation | - Demilitarization |
| - Destruction | - Processing | - Use |

...of defense articles

- The furnishing to foreign persons of any technical data controlled under this subchapter (§ 120.33).
- Military training of foreign units and forces, regular and irregular.



Definitions

Technical Data (ITAR)

- Information required for the design, development, production, manufacture, assembly, operation, repair, testing, maintenance, or modification of defense articles
- Classified information for defense articles and 600 series
- Invention secrecy order information
- Software directly related to defense articles



Technology (EAR)

- Specific information necessary for the development, production, use, operation, installation, maintenance, repair, overhaul, or refurbishing of an item
- May include other terms specified in technology ECCNs





Technical Data/Technology Exclusions

- Does not include information concerning general scientific, mathematical or engineering principles; or in the public domain.
- Does not include basic marketing information on function or purpose or general system descriptions of defense articles.

Be Careful:

- Public Domain Information:
 - Was it placed there legally?
 - Are there Defense Services in connection?
- Basic Marketing Information or General Systems Descriptions
 - No Technical data can be contained within





Definitions

U.S. Person

- US citizens
- Lawful permanent resident or protected individual
- Any U.S. corporation, business association, partnership, society, trust, entity, organization or group



Foreign Person

- Any natural person who is not a lawful permanent resident or who is not a protected individual of the U.S.
- Any foreign corporation, business association, partnership, trust, society, entity or group
- Any international organizations, foreign governments, agencies or subdivisions





Definitions

Dual National (DN) (*Agreements Guidelines*)

- An individual who holds nationality from the country of their employer who is a foreign licensee (or sublicensee) to the agreement, and also holds nationality from one or more additional countries

Third Country National (TCN) (*Agreements Guidelines*)

- An individual who holds nationality from a country other than the country of their employer who is a foreign licensee (or sublicensee) to the agreement

Deemed Export / Re-export (*ITAR and EAR*)

- Any release of ITAR technical data or technology or source code subject to the EAR to a foreign person of another country is a deemed Export /re-export to the home country or countries of the foreign person.
 - Does not apply to persons lawfully admitted for permanent residence in the U.S.
 - Deemed export /re-export licensing requirements are based on a foreign person's most recent country of citizenship or permanent residency.

Foreign Person Vs. Foreign National

Security Perspective

Foreign National



Non U.S. Citizen with No Right to Work in U.S.

Non U.S. Citizen with Temporary U.S. Work Permit

Non U.S. Citizen with Permanent Resident Status or Refugee / Asylee Status

U.S. Citizen

Export Perspective

Foreign Person



U.S. Person

For export purposes, a “green card” holder is a U.S. Person.

However, for Security purposes, that person would be treated as a Foreign National.



Definitions

Empowered Official (EO) (*ITAR*)

- A U.S. person who:
 - Is directly employed by the applicant or a subsidiary in a position having authority for policy or management within the applicant organization
 - Is legally empowered in writing by the applicant to sign license applications or other requests for approval on behalf of the applicant
 - Understands the provisions and requirements of the various export control statutes and regulations, and the criminal liability, civil liability, and administrative penalties for violating the AECA and the ITAR
 - Has the independent authority to:
 - Inquire into any aspect of a proposed export, temporary import, or brokering activity by the applicant
 - Verify the legality of the transaction and the accuracy of the information to be submitted; and
 - Refuse to sign any license application or other request for approval without prejudice or other adverse recourse
- Equivalent foreign person for foreign brokers.

Authorizing Your Export:

You want to export items/data and you need an “Authorization”

- Do you need a License?
 - State Department
 - Almost always need a license
 - Few “Exemptions” available
 - Exemption criteria can be tough to meet
 - Commerce Department
 - Very often, “no”
 - Many “Exceptions” available





What Are Exemptions/Exceptions?

Authorizations to export without a license ... provided that all of the defined criteria for its use can be met prior to export

ITAR EXEMPTIONS

- More than 50 exemptions each with a unique set of criteria
 - Review the ITAR completely to ensure that all the eligibility criteria can be met
 - Don't stop once you've found something that appears to be applicable
 - Review subcategories completely
 - Special reporting/certification requirements may apply

EAR EXCEPTIONS

- List-Based and Transaction-Based
 - Country groups related to reason for control
 - Know the 10 General Prohibitions
 - Don't stop once you've found something that appears to be applicable
 - Additional reporting requirements may apply



Export License Application Process

- Once received by the Regulating agency, the license is then often referred, or “*staffed out*”, to other agencies or offices for their review
- Final disposition of the license provided to the exporter using input from reviewing organizations



Approve

Approve with proviso / limitations / conditions

Return Without Action (RWA)

Deny

RWA





Prohibited and Embargoed Destinations

- ITAR §126.1 list of prohibited countries
 - Destined to or originating in
 - General policy of denial: Belarus, Burma, China, Cuba, Iran, North Korea, Syria, and Venezuela.
 - Carve-outs for other countries
- Under the EAR, there is a general policy of denial for Iran, North Korea, Syria and Cuba
- EAR §§744 and 746 provide guidance on other countries of concern



Questions To Get You There

Simple First Steps for Export Compliance

Ask yourself these six (6) simple questions:



Questions To Get You There

Ask yourself these six (6) simple questions:

1. What is it?

- Tech data
- Hardware
- Services

2. Which agency has jurisdiction over its export? (*Jurisdiction and Classification process*)

- State (ITAR)
- Commerce (EAR)

3. Is it controlled?

- All hardware is controlled for export, but not all data or information is. Remember definitions in the ITAR and EAR of what is and is not controlled (Public domain information, financial information, and delivery schedules are examples of what is NOT controlled).

4. Who will handle or access it and why?

- Identify the chain of custody for all that will get access.

5. Who will *ultimately* get it?

- Who is/are the ultimate end-user(s)?

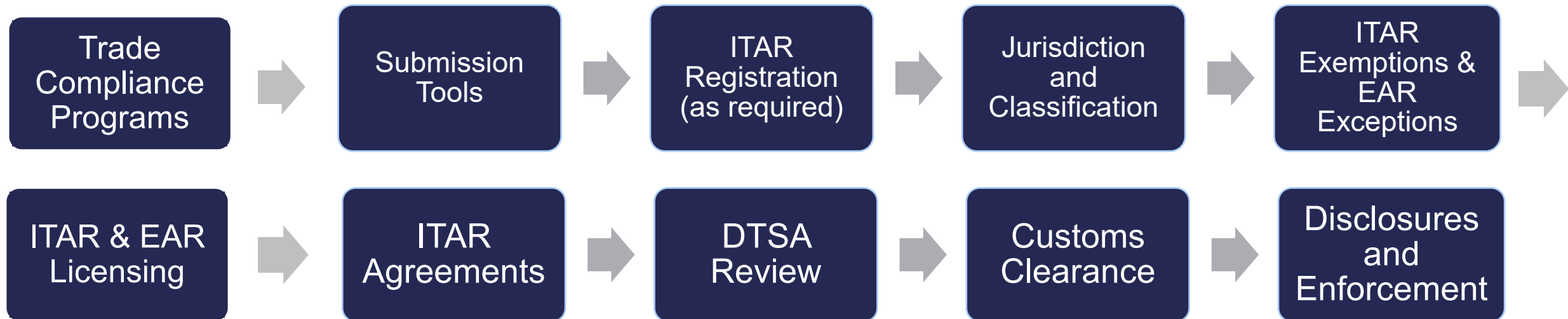
6. For what purpose is it being exported?

- Program,
- Platform,
- End-use



Conference Agenda

- The next few days are designed to take you through a transaction process from A to Z





Learning Reinforcement Scenario

- Utilizes a single scenario to illustrate the various steps of a transaction

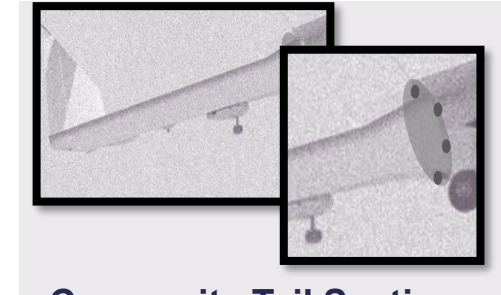
Our company, Anything For A Sale (AFAS), is a manufacturer of the Carmella 500 Tactical UAV. We have only done domestic sales to the U.S. government. We now want to explore the international market.

- Don't focus on the specific commodity – goal is to get comfortable with reading the regulations
- Will start scenario with the Jurisdiction and Classification panel

Items for Scenario



Carmella 500 Propeller



Composite Tail Section



Carmella 500 Launcher



Micro-SAR Radar



Carmella 500 Launch Rail



The Scenario

FACT SHEET PHASE I – MARKETING

- **Exporter:** Anything For A Sale (AFAS)
- **AFAS PM/DTC code:** M-5555
- **AFAS Ports:** Dulles, VA
- **AFAS Address/Phone:** 555 Patriot Way
Washington, DC 20009
555-544-5555

PLAYERS AND ROLES

- **AFAS** – Prime contractor. Looking to market the Carmella 500 Tactical UAV for the Austrian XX program.
- **AFAS Empowered Official:** I.M. Overworked
- **AFAS Business Development Manager:** Bill Davis
- **Australian DOD:** End user
- **Tony's Technical Things (T-3):** Subcontractor to AFAS. Will be the in-country maintenance support for the Carmella 500 UAV in support of the XX program.

TOOLS FOR THIS SECTION:

- **Bill Davis' #1** “Request for Export Approval”
- **Blank DSP-5**
- **Reference Material** – DSP-5 Guidelines

AFAS' FREIGHT FORWARDER LIST:

- | | |
|--|--|
| 1. Get It There
Corporate Office
1115 Gardens Terrace
Palms, CA 92222 | 3. Roman Logistics
Corporate Office
7810 14th Place
San Diego, CA 92222 |
| 2. FBE
800 Yukum Avenue
Carson City, NV 89999 | 4. Shipping and Handling International
Transportation
7810 Beach Drive
Columbia, MD 21111 |

FOREIGN INTERMEDIATE CONSIGNEE LIST:

- | | |
|--|--|
| 1. Austrian Alps Express
12 Mozart Blvd
Vienna, Austria | 2. Austrian Logistics Corp
91B Opera Ct
Vienna, Austria |
|--|--|

E-MAIL

From: Bill Davis
Sent: MM/DD/YYYY
To: I.M. Overworked
Subject: New Business Opportunity with the Austrian Ministry of Defence

Hi I.M.,

I just wanted to let you know that we have a huge business opportunity coming up to work with the Austrian Ministry of Defence. We have recently learned that the Austrian MOD is going to release an RFP for the XX Program for a Tactical Unmanned Aerial System. From what we hear, this RFP will be right in line with our Carmella 500 program.

I can't stress to you how important this opportunity is for the company as it would open a whole new market for us. We need to get moving on this as soon as possible as there will be many other companies competing for this new program.

Can you please help me so that we can get a license submitted as soon as possible to start talking with them? I am not sure what types of licenses we need, but here is what I have so far:

- 1) We did a previous classification of the Carmella UAS and this is a USML Platform, but most of what goes into it is not.
- 2) For this effort, we plan to work with our major subcontractor, Tony's Technical Things (T3), with whom we have worked in the past.
- 3) We will need to share marketing and technical information with the Austrian MOD and T-3. We will also need to provide a full technical proposal to the Austrian MOD.
- 4) In addition, we want to send a Carmella UAV System over for a demo. The value of the demo platform is roughly \$250,000.

I.M. - Just a heads up, Jane took care of getting the temporary export license for the system already while you were out. I took a stab at filling out your Request for Export/Import Approval and I hope I captured everything you need to write the licenses for our marketing effort.

If you need anything else, don't hesitate to call me at X-5555 or Ernie Engineer at X-5557. He will know all the technical aspects of the program.

Thanks! If at all possible, I would like to get these out by Monday.
Bill



The Scenario

REQUEST FOR EXPORT/IMPORT APPROVAL - #1

REQUESTER Bill Davis	PROGRAM/FUNCTION XX Program	EXT X5555	FAX X5556
JURISDICTION & TYPE OF LICENSE/AGREEMENT/PERMIT			
ITAR ☐ PERMANENT EXPORT (DSP-5) * ☐ IMPORT CERTIFICATE (DSP-53) ☐ TEMPORARY IMPORT (DSP-61) ☐ TEMPORARY EXPORT (DSP-73) ☐ CLASSIFIED EXPORT/IMPORT (DSP-85) ☐ TEMPORARY OR PERMANENT LICENSE AMENDMENT ☐ TECHNICAL ASSISTANCE AGREEMENT ☐ MANUFACTURING LICENSE AGREEMENT	EAR ☐ VALIDATED LICENSE ☐ IMPORT CERTIFICATE	ATFE ☐ PERMANENT IMPORT ☐ PERMANENT EXPORT	AGREEMENTS & LICENSES ☒ UNCLASSIFIED ☒ DATA ☐ SOFTWARE ☐ HARDWARE ☒ NEW ☐ RENEWAL ☐ AMENDMENT ☐ GENERAL CORRESPONDENCE ☐ CLASSIFIED ☐ CONFIDENTIAL ☐ SECRET ☐ TOP SECRET ☐ OTHER
U.S. MUNITIONS LIST CATEGORY ???	EXPORT CONTROL COMMODITY NO. ???	U.S. MUNITIONS LIST CATEGORY ???	REQUESTED EFFECTIVE DATE ASAP!!!!
FOREIGN COUNTRY OF ULTIMATE DESTINATION Austria		PROBABLE PORT OF EXIT FROM U.S. ???	
U.S. GOVERNMENT PERSONNEL FAMILIAR WITH THE COMMODITY			
NAME(S) Maj. Kool	AGENCY(IES) Air Force	IF BRIEFED, DATE BRIEFED	TELEPHONE 555.555.5555
MATERIAL/DATA DESCRIPTION			
DESCRIBE THE COMMODITY TO BE EXPORTED/IMPORTED FOR: 1) HARDWARE-NAME, QUANTITY, VALUE, PART NUMBER; 2) MARKETING DATA-TITLE, CONTROL NUMBER, DATE PUBLISHED, LEVEL OF CLASSIFICATION; 3) OFFSHORE PROCUREMENT-LIST ALL DRAWING NUMBERS AND ARTICLE DESCRIPTIONS; 4) MLA/TAA-SCOPE AND DURATION OF AGREEMENT. NOTE: IF SOFTWARE SOURCE CODE IS TO BE PROVIDED, COMPLETE ATTACHED CHECKLIST. IF NOT, SO INDICATE ON THE CHECKLIST. (ATTACH ADDITIONAL PAGES, AS NEEDED).			
A tactical UAV to include launch and recovery system. AFAS will send UAS marketing technical information for the Carmella 500 to Austrian MOD and to T-3 in Austria. AFAS will also send 1 Carmella 500 System for demonstration. Value of UAS System is \$250,000. It is for the XX program; T-3 will be a subcontractor.			
PURPOSE FOR WHICH THE MATERIAL/DATA IS REQUIRED, SPECIFY PROGRAM/END ITEM (ATTACH CONTINUATION PAGES, AS NEEDED)			
To market/demo "Carmella 500" Tactical UAV to Austrian MOD in support of Program XX.			
TECHNICAL CONTACT Ernie Engineer	EXT X5557	U.S. GOVERNMENT CONTRACT/BID/PROPOSAL NUMBER N/A	
TO THE BEST OF YOUR KNOWLEDGE, HAS IDENTICAL/SIMILAR COMMODITY BEEN PREVIOUSLY AUTHORIZED FOR EXPORT/IMPORT? (ATTACH COPY) ☐ YES ☐ NO		IF YES, CITE LICENSE NUMBER(S):	
BACKGROUND/HISTORY (E.G., PHASE OF PRODUCT DEVELOPMENT, PROGRAM, USE OF ITEM, SPECIFIC NEED, AND BENEFIT TO U.S. GOVERNMENT) (ATTACH ADDITIONAL PAGES, AS NEEDED)			

* EXECUTED DSP 83s ARE REQUIRED WITH APPLICATIONS FOR SME HARDWARE, CLASSIFIED DATA/HARDWARE OR AS DIRECTED BY DDTC.

VALUE(S)					
TOTAL ESTIMATED/ACTUAL VALUE U.S. \$ <u>\$250,000</u>					
FOR INITIAL OR BASE AGREEMENTS ONLY, PROVIDE THE INFORMATION AS FOLLOWS:					
TECHNICAL DATA: U.S. \$ <u>0</u> HARDWARE: U.S. \$ <u>250,000</u> SERVICES: U.S. \$ <u>0</u>					
22 CFR PART 130 TO THE BEST OF YOUR KNOWLEDGE:					
PROGRAM VALUE EXCEEDS \$500,000 ☐ YES ☒ NO			1. HAVE ANY POLITICAL CONTRIBUTIONS IN AN AGGREGATE AMOUNT OF \$5,000 OR MORE BEEN PAID? ☐ YES ☐ NO		
IF YES, ANSWER QUESTIONS 1. AND 2.			2. HAVE ANY FEES OR COMMISSIONS IN AN AGGREGATE AMOUNT OF \$100,000 OR MORE BEEN PAID OR OFFERED OR AGREED TO BE PAID? ☐ YES ☐ NO		
Business Development Concurrence (initials) _____			IF YES, ARE ATTACHED 22 CFR 130.10 REPORT COMPLETED AND ORIGINAL OF PART 130 LETTER PROVIDED HEREWITH. ☐ YES ☐ NO		
Legal Administrator Concurrence (initials) _____					
MAJOR DEFENSE EQUIPMENT VALUE EXCEEDS \$14,000,000 OR AGREEMENT FOR DEFENSE SERVICES EXCEEDS \$50,000,000. ☐ YES ☒ NO IF YES, CONGRESSIONAL APPROVAL IS REQUIRED AND ALLOW FOR ADDITIONAL APPROVAL TIME. ATTACH OFFSET INFORMATION.					
CUSTOMER/SUBCONTRACTOR/SUPPLIER (INITIAL & DATE FOR SCREENING, ATTACH SCREENING & ADDITIONAL PAGES, AS NEEDED)					
FOREIGN END USER(S) HAVE YOU SCREENED THIS PARTY? ____ Y ____ N Initials ____ Date ____		NAME & ADDRESS Austrian MOD 555 Von Trapp Way, Vienna, 5r5r5r		COUNTRY Austria	
FOREIGN CONSIGNEE(S) HAVE YOU SCREENED THIS PARTY? ____ Y ____ N Initials ____ Date ____		NAME & ADDRESS T-3 555 Linzer Drive, Vienna, 5r5r5r		COUNTRY Austria	
FOREIGN INTERMEDIATE CONSIGNEE(S) AGENT __/REP __ or SUB __ (Check One) HAVE YOU SCREENED THIS PARTY? ____ Y ____ N Initials ____ Date ____		NAME & ADDRESS Standard list of Freight Forwarders		COUNTRY Austria	
U.S. CONSIGNEE(S) (FREIGHT FORWARDERS AS APPROVED BY TRAFFIC) HAVE YOU SCREENED THIS PARTY? ____ Y ____ N Initials ____ Date ____		NAME & ADDRESS Standard list of Freight Forwarders		COUNTRY US	
WERE FOREIGN MILITARY SALES CREDITS OR LOAN GUARANTEES INVOLVED OR WILL BE INVOLVED IN FINANCING THE AGREEMENT? IF YES, EXPLAIN: (Provide attachments as necessary). ☐ YES ☒ NO					
I UNDERSTAND THAT I MAY NOT IMPLEMENT THE PROPOSED SHIPMENT/AGREEMENT UNTIL APPROVAL IS RECEIVED FROM THE U.S.GOV'T (ODTC) AND FOR AGREEMENTS (TAAMLAS), NO ACTIVITY SHALL OCCUR UNTIL EXECUTED COPIES OF THE AGREEMENTS WITH DSP 83, IF REQUIRED, ARE SUBMITTED TO DDTC (U.S. GOV'T) . I CERTIFY THAT I AM FAMILIAR WITH THE INTERNATIONAL TRAFFIC IN ARMS REGULATIONS (ITAR); EXPORT ADMINISTRATION REGULATIONS (EAR); AND ALCOHOL, TOBACCO, AND FIREARMS (ATF) EXPORT/IMPORT REGULATIONS APPLICABLE TO THIS PARTICULAR REQUEST, AND THAT I UNDERSTAND THE DEFINITION OF PUBLIC DOMAIN AS DEFINED IN ITAR 22 CFR, SECTION 120.11. I WILL DISCUSS ONLY PUBLIC DOMAIN AND/OR PUBLIC RELEASE INFORMATION WITH ALL FOREIGN PERSONS UNTIL SUCH TIME AS THE APPROPRIATE LICENSE AUTHORIZATION HAS BEEN OBTAINED FROM THE GOVERNMENT AGENCY. I WILL DO EVERYTHING WITHIN MY AUTHORITY TO ENSURE THAT ALL MEMBERS OF THE PROPOSAL/PROGRAM TEAM ARE AWARE OF THE REQUIREMENTS OF ITAR/EAR/ATF. FURTHER, I WILL ENSURE COMPLIANCE WITH ANY APPROVAL RECEIVED FROM THE U.S. GOV'T COMPLETE WITH ATTENDANT PROVISOS. THE INFORMATION CONTAINED IN THIS DOCUMENT IS TRUE, ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE.					
REQUESTER Bill Davis	EXT X5555	DATE M/D/YY	LICENSE ADMINISTRATOR L.M. Overworked	EXT X5688	DATE M/D/YY
FOR COMPLETION BY EMPOWERED OFFICIAL					
EXPORT LICENSE SYSTEM NUMBER		EO (SIGNATURE)		DATE FORWARDED TO STATE	



Now What?

three long days ahead...this is a very complicated business

Don't worry if you can't remember it all, it takes time to get good at this...

Hopefully you will leave with the basic knowledge and tools that you need to ask the *right questions* of the *right people*

Much of your success will depend on:

- Your knowledge/training
- Your relationships with peers in this field

Export Compliance



It's not the squeaky wheel... be aware of what is going on in your Company
You don't always know there's a problem until something goes terribly wrong...
At that point it may be too late for the easy fix!



On To The Questions

Good luck and ask lots of questions...

People are here to help...

