



SIA – 2026 SUMMER BACK TO BASICS Licensing under the EAR

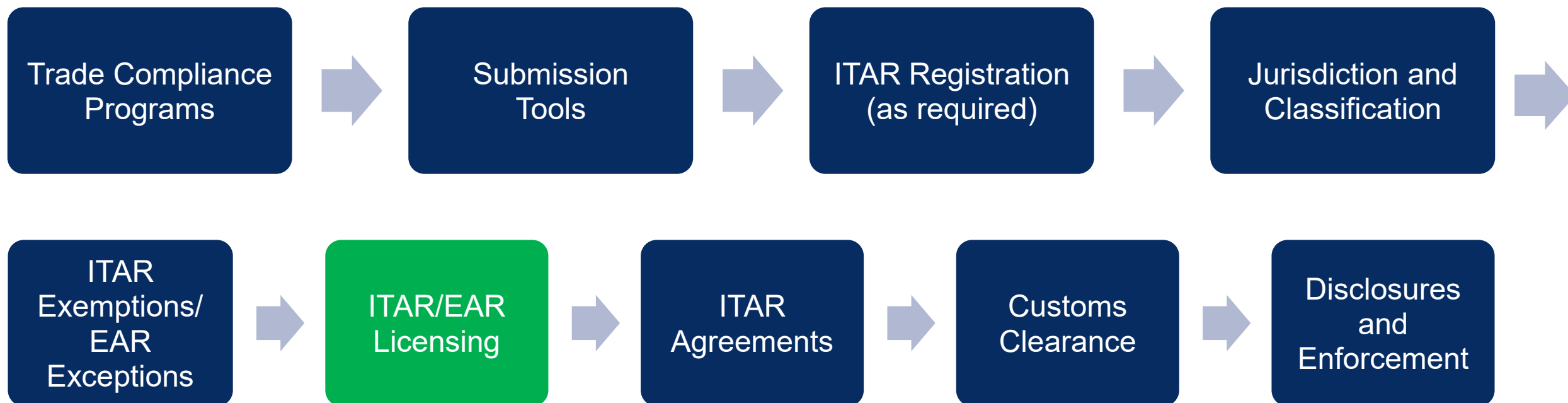
Candace M. J. Goforth
Managing Director
Goforth Trade Advisors LLC
candace@goforthandexport.com

Katherine Heubert
Senior Global Trade Counsel
HPE
heubert@hpe.com



Conference Agenda

We are here in the transaction process!





SCENARIO REFRESHER

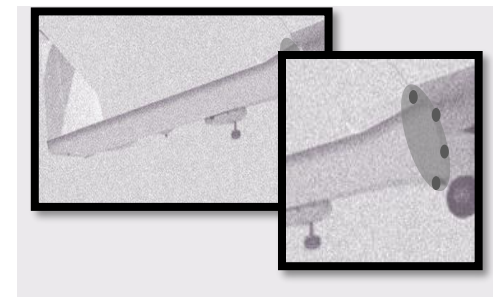
Our company, Anything For A Sale (AFAS), is a manufacturer of the Carmella 500 Tactical UAV. We have only done domestic sales to the U.S. government. We now want to explore the international market.

- We are expecting an RFP from the Austrian MOD for the Program for a Tactical Unmanned Aerial System
- Yesterday we learned the Jurisdiction and Classification of the Carmella 500 Tactical UAV hardware and technical data
- Today we will focus on what type of licensing is required to respond to the Austrian MOD RFP

ITEMS FOR SCENARIO



Carmella 500 Propeller
9A610.y.25



Composite Tail Section **9A610.t**



Carmella 500 Launcher
9A610.x

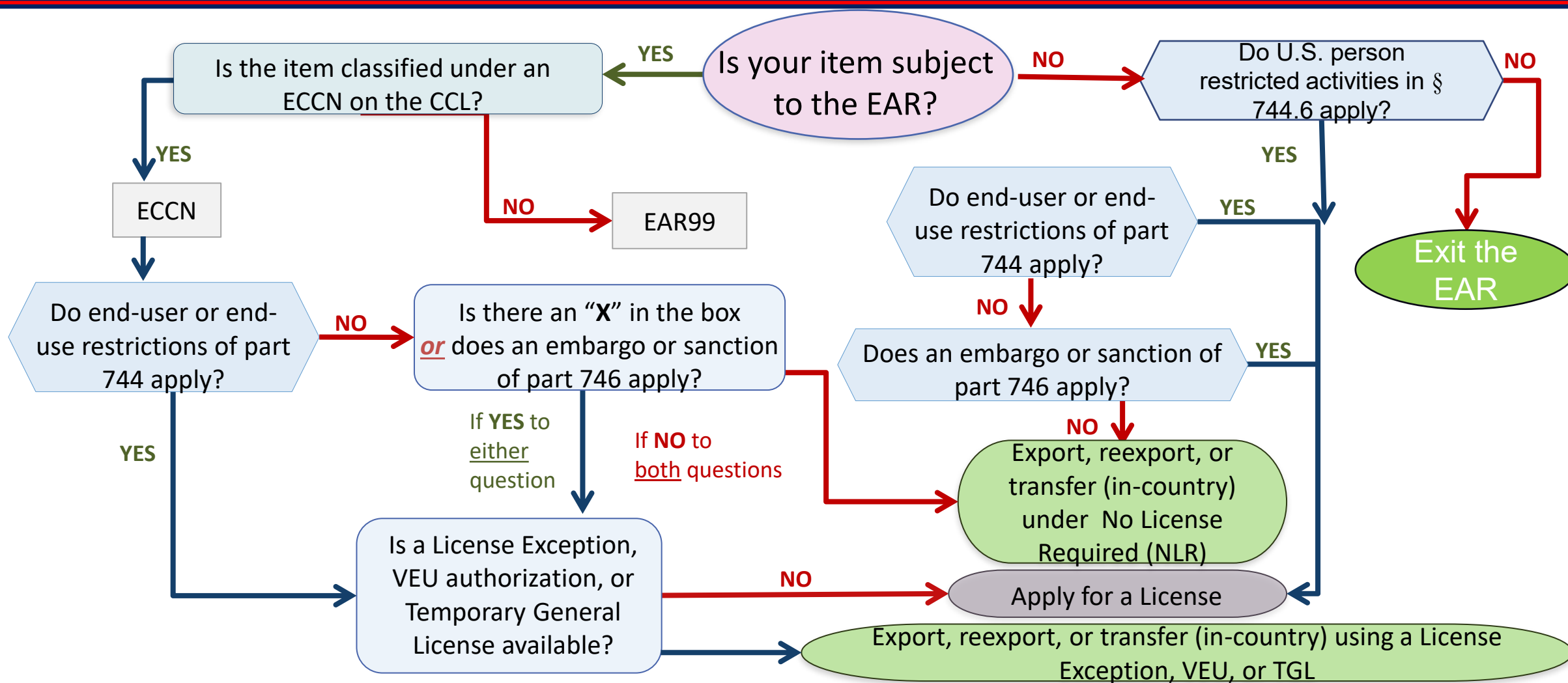


Micro-SAR Radar
XI(a)(3)(ii)



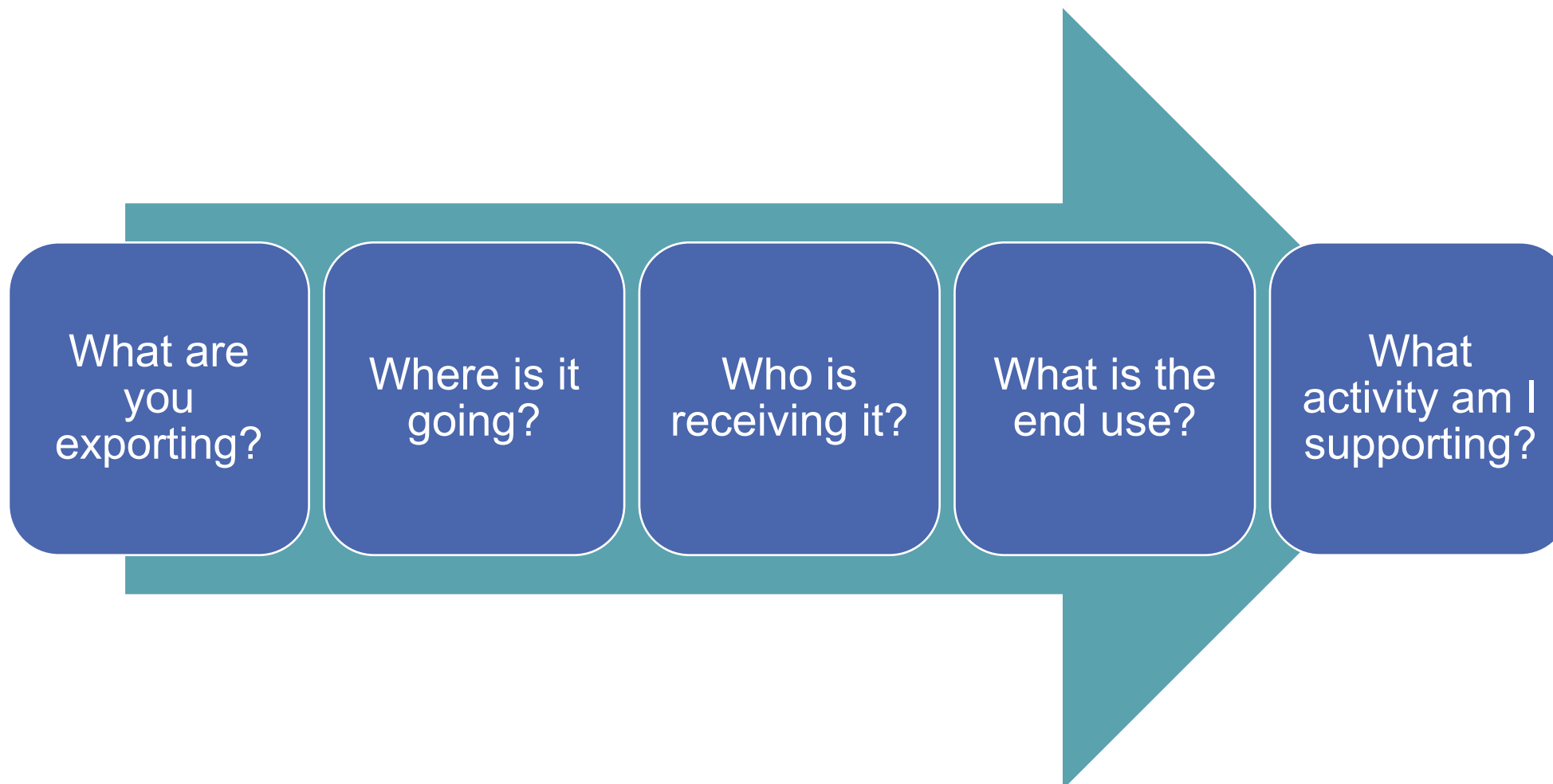
Carmella 500 Launch Rail
9A610.x

EAR LICENSE REQUIREMENT FLOWCHART





DETERMINING LICENSE REQUIREMENTS





EAR Scenario #1

Carmella 500 Launcher Rail

- Our product performance in Afghanistan and Austria has really opened up our sales activities, and just last month, we completed delivery of the Carmella 500 TUAV to the Singapore MoD. The Singapore MoD, much like Austria has also decided to maintain additional Launcher Rails on-hand at all times as a contingency. The rails will be obtained by Singapore Sling Company, the MoDs in country service provider;
- Additional Information:
 - Carmella 500 : USML CAT VIII(a)(5)
 - Carmella 500 Launcher: 9A610.x
 - Carmella 500 Launch Rail: (Value: \$2,575 each)
- How can we send the rails?





EAR License Scenario #1

Carmella 500 Launcher Rail

- What is the Classification of the Launch Rail?
- What are the reasons for control?
- Is there a license requirement to export to Singapore?
- Are there any exceptions available to support this export to Singapore?
 - STA
 - LVS
 - GOV
 - TMP
 - RPL
 - TSU



9A610 Military aircraft and related commodities, other than those listed in 9A991.a (see List of Items Controlled) – **ECCN 9A610.x**

Reasons for Controls: NS, RS, MT, AT, UN	Country Chart (See Suppl. 1 to part 738)
NS applies to entire entry except : 9A610.b; parts and components controlled in 9A610.x if being exported or reexported for use in an aircraft controlled in 9A610.b; and 9A610.y.	NS Column 1
RS applies to entire entry except : 9A610.b; parts and components controlled in 9A610.x if being exported or reexported for use in an aircraft controlled in 9A610.b; and 9A610.y.	RS Column 1
RS applies to 9A610.y	China, Russia, or Venezuela (see §742.6(a)(7))
MT applies to 9A610.t, .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

License Exceptions LVS: \$1500 GBS: N/A CIV: N/A

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.

What are the reasons for Control apply to 9A610.x? **NS:1, RS:1, AT:1, UN**

Which reasons for Control apply to **Singapore for 9A610.x? **NS:1, RS:1****

Reasons for Controls

Countries	Chemical and biological weapons			Nuclear nonproliferation		National security		Missile tech	Regional stability		Firearms convention	Crime control			Anti-terrorism	
	CB 1	CB 2	CB 3	NP 1	NP 2	NS 1	NS 2	MT 1	RS 1	RS 2	FC 1	CC 1	CC 2	CC 3	AT 1	AT 2
Saudi Arabia	X	X	X	X		X	X	X	X	X		X		X		
Senegal	X	X		X		X	X	X	X	X		X		X		
Serbia	X	X				X	X	X	X	X		X	X	X		
Seycheles	X	X		X		X	X	X	X	X		X		X		
Sierra Leone	X	X		X		X	X	X	X	X		X		X		
Singapore	X	X		X		X	X	X	X	X		X		X		
Sint Maarten (the Dutch two-fifths of the island of Saint Martin)	X	X		X		X	X	X	X	X		X		X		
Slovakia ³	X					X		X	X							
Slovenia ³	X					X		X	X							
Solomon Islands	X	X		X		X	X	X	X	X		X		X		
Somalia ¹	X	X		X		X	X	X	X	X		X		X		

Is there a license requirement to export to Singapore?



EAR License Scenario #1

Carmella 500 Launcher Rail

- What is the Classification of the Launch Rail? **9A610.x**
- What, if any, exceptions are available to support this export to Singapore?

STA

LVS

GOV

TMP

RPL

TSU

UN applies to entire entry except 9A610.y

See § 746.1(b) for UN controls

List Based License Exceptions (See Part 740 for a Description of All License Exceptions)

LVS: \$1,500

GBS: 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 9x515 and “600 series” 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.



License Exception STA

Country Groups A:5 and A:6

STA Country Group A:5:

Argentina	Australia	Austria	Belgium	Bulgaria
Canada	Croatia	Czech Republic	Denmark	Estonia
Finland	France	Germany	Greece	Hungary
Iceland	India	Ireland	Italy	Japan
Latvia	Lithuania	Luxembourg	Netherlands	New Zealand
Norway	Poland	Portugal	Romania	Slovakia
Slovenia	South Korea	Spain	Sweden	Switzerland
Turkey	United Kingdom			

STA Country Group A:6:

Albania	Cyprus	Israel	Malta
Mexico	Singapore	South Africa	Taiwan

§ 740.20(c) – authorizing paragraph of STA.



EAR License Scenario #1 Answer

Carmella 500 Launcher Rail

- What is the Classification of the Launch Rail? **9A610.x**
- What are the reasons for control? **NS and RS**
- Is there a license requirement to export to Singapore? **Yes**
- What if any exceptions are available to support this export to Singapore? **None are available**

STA

LVS

GOV

TMP

RPL

TSU

- What do I need to do now that a license is required?



APPLYING FOR A LICENSE (EAR PART 748)

Block-by-block instructions are in Supplement No. 1 of Part 748

- Block-by-block instructions in Special requirements in Supplement No. 2 for types of transactions including (l) reexports, (o) technology, (w) requesting new STA eligibility for “600 series” end items under § 740.20(g), (x) for a transaction involving a 9x515 or “600 series” item that is equivalent to a transaction previously approved under ITAR, and (y) satellite exports
- Support document requirements are found in the sections beginning with § 748.9

Application software is SNAP-R, under the Licensing tab on the BIS homepage. Guidance information, training videos, and other information available from that drop-down menu

Export License Application

Status **DRAFT**

Required fields are marked with an asterisk (*)

To grant or delete rights to others to view, edit, or submit this Work Item, [Manage User Permissions](#)

Copy and Reuse

Delete

Application Steps

1 Edit Details

Contact Information

Document Checklist

License Information

Applicant Information

Other Party Information

Contact Information

Reference Number
IMI2025

1. Contact Person (First Name, Last Name)
Candace Goforth

2. Telephone Number*

7000000000

3. Fax Number



APPLICATION FOR LICENSES OR COMMODITY CLASSIFICATIONS

SNAP-R uses only one form, but different fields are made available dependent upon the type of request:

- Export License 1-11, 13-15, 18-19, 21-24
- Reexport License 1-7, 9-24

Multiple items can be included in a single license application. However, combining divergent items (i.e., computers and shotguns) on the same license application can delay approvals



License Preparation – Obtain the Facts

- Just like your ITAR licenses, become part of the business team at the beginning!
 - Talk to your Program Manager, Business Development, Marketing, Contracts, Engineering, Procurement teammates
- Define the transaction in plain English
 - Answer: Who, What, When, Where, Why
- Let EAR Part 748 be your guide!
 - Supplement 1 (BIS-748P form instructions)
 - Supplement 2 (Unique Application/Submission Requirements)



License Preparation – Who?

- Who are the parties involved in the transaction?
- Know the role of each party to the transaction
- Some terms and definitions are different than the ITAR
 - **Applicant**
 - **Other party authorized to receive license** (agent / corporate office)
 - **Purchaser** (foreign person who's entered into transaction to buy the items)
 - **Intermediate consignee** (foreign freight forwarder or in-country agent)
 - **Ultimate consignee** (foreign person receiving the exported items)
 - **End-User** (foreign person using the exported items)
 - **Additional End-Users** (e.g., “sublicensees”)
 - No additional US parties; No US freight forwarders
- Refer to EAR definitions in Part 772, Look for “ ” in EAR text.



License Preparation – What?

There are some key differences:

- Only 1 application type (multipurpose application form)
- No multiple DSP forms or Agreements
 - Technical assistance is a transfer of EAR controlled technology
- No requirement for temporary *import* licenses

....but you still need to know:

- What are you exporting
 - Identify ECCN to lowest level
 - Are you also sending EAR technology? Spares? Tool kits?
 - Identify model, nomenclature of items and any special characteristics
 - Quantity need not be tied to a PO, but must be realistic for four years



License Preparation – What?

Unique License Application Requirements

Supplement 2 to Part 748 mandates specific information for certain export/reexport scenarios

Selected Export Scenarios	Paragraph Ref.
Parts & components incorporated into foreign-made products for subsequent sale to third countries	(i)(1)
Items intended for a vessel / aircraft under construction	(j)(1), (j)(2)
Items intended for vessels and aircraft in operation	(j)(3)
Regional stability (RS) controlled items	(k)
Technology	(o)
Temporary exports/reexports not eligible for TMP	(p)
In-country transfers	(v)
600 series items previously approved under an ITAR license	(x)
Satellite exports	(y)



License Preparation – What?

Requests for Export of Technology

- Must describe format of technology in Block 22(j)
- Must attach a Letter of Explanation
 - Requirements detailed in Supplement 2
 - Includes considerable detail such as parties involved, project locations, the type, format and scope of the technology, expected end-items, and foreign availability
- Includes “deemed exports”
 - Release of technology or source code to foreign nationals in the U.S. or abroad is deemed an export to their home country



License Preparation – When?

- Since licenses can take over 30 days, you need to know dates of the deliverable, proposal, meeting or demonstration
- Take advantage of bulk licensing to position your company to meet purchase orders before they are received.
 - For large orders, consider a representative parts-list by ECCN
- Similar parts under the same ECCN involving the same parties and end-use would also be authorized



License Preparation – Where?

- Understanding the destination(s) is critical
 - Where are the articles going first? Ultimately?
 - Have you considered license requirements for all countries
- Have you considered the prohibited end-uses/end-users in Part 744 and the embargoed destinations in Part 746?
- Have you conducted Denied Party Screening?



License Preparation – Why?

- Why is the transfer taking place – specific purpose?
- Make the transaction clear – define your boundaries
- How will the commodity support a specific end-use?
 - To install on [name of next higher assembly] on Eurofighter for use by the MoD
 - To send to customer for trial and evaluation
 - Tech data for marketing efforts, to respond to a proposal, conduct limited technical discussion, host in-plant visit
 - Employ Foreign National for [X] role on Project [Y].
- Avoid vague statements - “could” be used vs. “will” be used.
- If selling to a distributor/reseller, note reexport/retransfer in the end use block.



Supporting Documentation (end-use/r assurances)

- 3 Types of applications require support documentation:
 - “600 Series Major Defense Equipment” (MDE) to all destinations (except PRC)
 - *BIS Form 711 (Statement by Ultimate Consignee or Purchaser) or Statement on company letterhead*
 - FC controlled items to OAS countries
 - *FC Import Certificate*
 - Certain items destined for PRC
 - *PRC End-User Certificate*
 - License applications may be submitted without these documents, but documents must be in-hand prior to shipment



Supporting Documentation (end-use/r assurances)

- Exceptions exist for certain export scenarios per EAR §748.9(c), for example:
 - Purchaser or ultimate consignee are US Government agency or foreign government agency (other than PRC)
 - Export is for temporary exhibit, demonstration or test
 - Application is for software or technology
 - When BIS explicitly grants a waiver per EAR § 748.13
- Best practices:
 - Read exceptions carefully
 - Always obtain some type of end-use assurance as due diligence



Other Support Documents

- Technical specifications (e.g., drawings, product brochures)
- Precedent licenses
- Attachments to technology license Letter of Explanation that further define the tech transfer
- Representative parts list
- Justification of your ECR reclassification



DDTC LICENSES FOR EAR ITEMS §734.3(e)

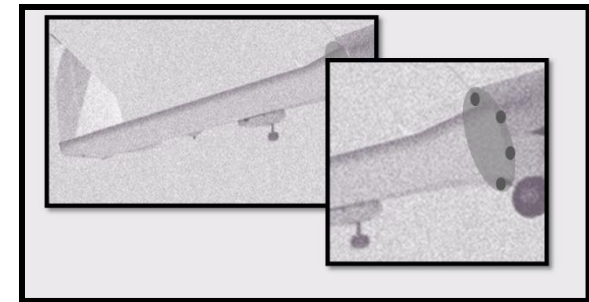
- DDTC may license items subject to the EAR pursuant to Executive Order 13637
- Items subject to the EAR must be used in or with items subject to the ITAR
- Items subject to the EAR that are licensed under ITAR §120.5(b) remain subject to the EAR
- Future transfers not covered by the ITAR approval will require BIS authorization for items subject to the EAR
- Potential violations pertaining to the use of ITAR §120.5(b) may result in voluntary disclosures to both DDTC and BIS



EAR License Scenario #2

Carmella 500 Composite Tail Section

- The U.S. Government has deployed the Carmella 500 in Afghanistan. The program manager has just phoned with an urgent request received from the field engineers for a Composite Tail Section to replace one where a structural crack was noticed during routine maintenance. They are returning the failed Composite Tail Section to the U.S., but now only have five operational UAVs supporting the U.S. Government, which is the minimum our contract allows at all times.
- Additional Information:
 - Carmella 500 : USML CAT VIII(a)(5)
 - Tail Section : (Value: \$10,846)
- What license exception (s) can be used to expedite delivery to Bagram Airfield?





EAR License Scenario #2

Carmella 500 Composite Tail Section

- What is the Classification of the Composite Tail Section?
- What are the reasons for control?
- Is there a license requirement to export to Afghanistan?
- Are there any license exceptions available to support this export to Afghanistan?

STA

LVS

GOV

TMP

RPL

TSU



9A610 Military aircraft and related commodities, other than those listed in 9A991.a (see List of Items Controlled) – ECCN 9A610.t

Reasons for Controls: NS, RS, MT, AT, UN	Country Chart (See Suppl. 1 to part 738)
NS applies to entire entry except : 9A610.b; parts and components controlled in 9A610.x if being exported or reexported for use in an aircraft controlled in 9A610.b; and 9A610.y.	NS Column 1
RS applies to entire entry except : 9A610.b; parts and components controlled in 9A610.x if being exported or reexported for use in an aircraft controlled in 9A610.b; and 9A610.y.	RS Column 1
RS applies to 9A610.y	China, Russia, or Venezuela (see §742.6(a)(7))
MT applies to 9A610.t, .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

License Exceptions LVS: \$1500 GBS: N/A CIV: N/A

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.

What are the reasons for Control apply to 9A610.t? NS:1, RS:1, MT:1, AT:1, UN

Which reasons for Control apply to Afghanistan for 9A610.t? NS:1, RS:1, MT:1,

Reasons for Control

Countries	Chemical and biological weapons			Nuclear nonproliferation		National security		Missile tech	Regional stability		Firearms convention	Crime control			Anti-terrorism	
	CB 1	CB 2	CB 3	NP 1	NP 2	NS 1	NS 2	MT 1	RS 1	RS 2	FC 1	CC 1	CC 2	CC 3	AT 1	AT 2
Afghanistan	X	X	X	X		X	X	X	X	X		X		X		
Albania ^{2 3}	X	X		X		X	X	X	X	X						
Algeria	X	X		X		X	X	X	X	X		X		X		
Andorra	X	X		X		X	X	X	X	X		X		X		
Angola	X	X		X		X	X	X	X	X		X		X		
Antigua and Barbuda	X	X		X		X	X	X	X	X	X	X		X		
Argentina	X					X		X	X		X	X		X		
Armenia	X	X	X	X		X	X	X	X	X		X	X			
Aruba	X	X		X		X	X	X	X	X		X		X		
Australia ¹⁰	X															
Austria ^{3 4}	X					X		X	X							
Azerbaijan	X	X	X	X		X	X	X	X	X		X	X			
Bahamas, The	X	X		X		X	X	X	X	X	X	X		X		
Bahrain	X	X	X	X		X	X	X	X	X		X		X		
Bangladesh	X	X		X		X	X	X	X	X		X		X		

Is there a license requirement to export to Afghanistan?



EAR License Scenario #2 Answer

Carmella 500 Composite Tail Section

- What is the Classification of the Composite Tail Section? **9A610.t**
- What are the reasons for Control? **NS, RS and MT**
- Is there an authorization required to export to Afghanistan? **Yes**
- What if any exceptions are available to support this export to Afghanistan?

STA

LVS

GOV

TMP

RPL

TSU

- Would Exception RPL be acceptable? Why or why not?
- Would Exception GOV apply?

See §740.2, especially for “600 Series” items



EAR License Scenario #2 Answer

Carmella 500 Composite Tail Section

- § 740.2 RESTRICTIONS ON ALL LICENSE EXCEPTIONS
- (a) You may not use *any* License Exception if any one or more of the following apply:
 - (5)(i) The item is controlled for missile technology (MT) reasons, except that the items described in ECCNs 6A008, 7A001, 7A002, 7A004, 7A101, 7A102, 7A103, 7A104, 7A105, 7B001, 7D001, 7D002, 7D003, 7D101, 7D102, 7E003, 7E101 or 9A515...

(13) “600 series” items that are controlled for missile technology (MT) reasons may not be exported, reexported, or transferred (in-country) under License Exception STA (§ 740.20 of the EAR). Items controlled under ECCNs 9D610.b, 9D619.b, 9E610.b, or 9E619.b or .c are not eligible for license exceptions except for License Exception GOV (§ 740.11(b)(2) of the EAR). Only the following license exceptions may be used to export “600 series” items to destinations other than those identified in Country Group D:5 or Hong Kong (see Supplement No. 1 to part 740 of the EAR):

- (i) License Exception LVS (§ 740.3 of the EAR);
- (ii) License Exception TMP (§ 740.9 of the EAR);
- (iii) License Exception RPL (§ 740.10 of the EAR);
- (iv) License Exception TSU (§ 740.13(a), (b), (f) and (g) of the EAR);
- (v) License Exception GOV (§ 740.11(b) or (c) of the EAR);
- (vi) License Exception BAG (§ 740.14); and
- (vii) License Exception STA under § 740.20(c)(1) of the EAR, provided all of the applicable terms and conditions, including those specific to the “600 series” are met.

You Need a License!

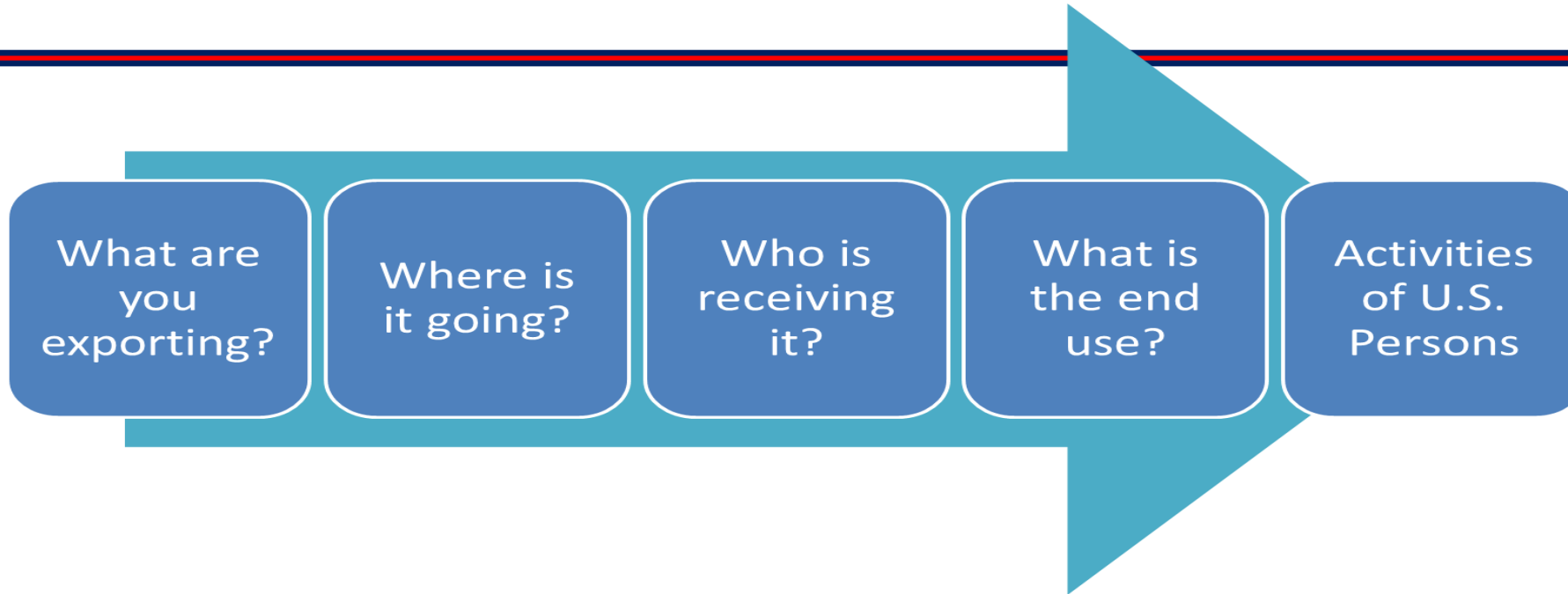


BIS LICENSE PROCESSING FOR “600 SERIES”

- Munitions Control Division (MCD)
 - Engineers, Compliance Specialists, and Policy Analysts
- Review license applications for less sensitive military items that have transitioned from the USML, subject to the EAR’s “600 series” ECCNs
- MCD is also involved in:
 - Commodity Classification Automated Tracking System (CCATS)
 - Participates in Commodity Jurisdiction (CJ) process



OBJECTIVES OF “600 SERIES” LICENSING



“600 Series” licenses are reviewed consistent with the following:

- Statutory requirements
- President’s Conventional Arms Transfer Policy and other relevant policies
- Regional and country instability; human rights concerns
- International treaties and commitments



STEP 1: INITIAL BIS REVIEW

- LO verifies all submitted information:
 - Policy (Country or countries involved, Country Groups, Risk of diversion, license exception eligibility, etc.)
 - Compliance (Parties, bona fides, licensing history)
 - Technical information (End use, quantity, classification/ECCN, Technical documents, end-user requirements)
- Checks if Export Enforcement has any comment
- Asks questions to exporter, if necessary
- Has Days 0-9 for initial Commerce/BIS review (Executive Order 12981/EAR §750.4)



STEP 2: CONDUCT INTERAGENCY REVIEW



Defense Technology Security Administration (DTSA)
Technical Review
Assess National Security concerns



Conventional Arms Threat Reduction Office
Distributes Licenses Throughout Regional/Functional Bureaus
Foreign Policy/Regional Stability
ITAR § 126.1 U.S. Arms Embargoed Countries

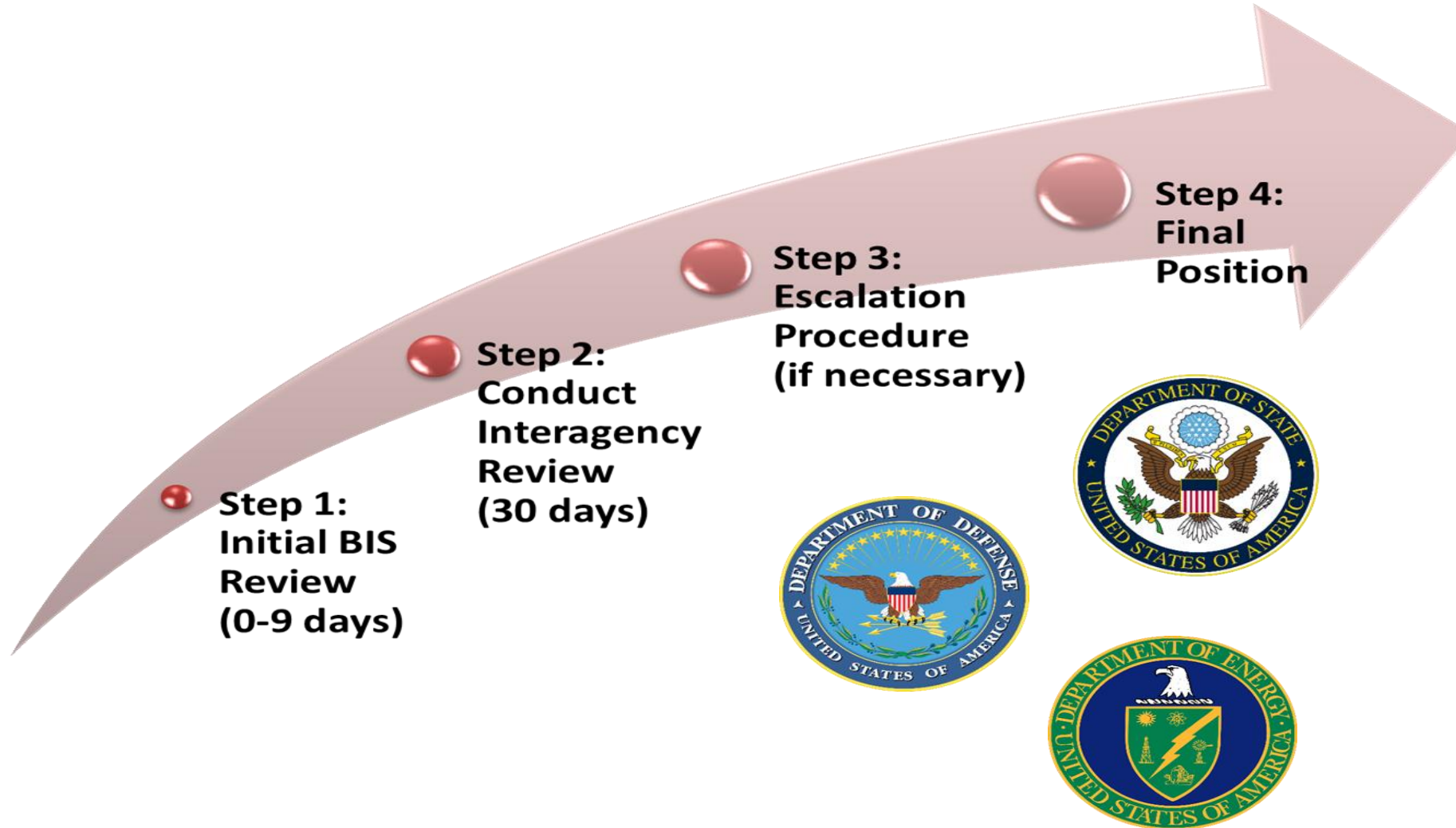


National Nuclear Security Administration (NNSA)
Focuses on Missile Technology and Nuclear Issues

Agencies have 30 days for their review per Executive Order 12981/EAR §750.4



TIMELINE OF BIS LICENSE PROCESSING





COMMON REASONS FOR RWAs

- No response to licensing officer's request within allotted timeframe
- Cannot verify classification, failure to address all technical parameters of the ECCN
- End-user(s) not provided
- Incorrect physical addresses for foreign party
- No representative parts list provided (bulk licenses)
- No License Required (NLR)
- Not under BIS jurisdiction
- Addition of parties
- Consolidation of multiple licenses



BEST PRACTICES TO AVOID RWAs!

- End Use and End User need to be **clearly identified** and explained:
 - Is the export appropriate for the stated end use?
 - What is the end-platform; and who is the end-user of the platform that the item will be integrated into?
 - If you know who the ultimate end user is, list them as an end user; if you don't know, ask your customer, or if the end user can't be identified, then state why.
- Beware of “Red Flags.” Know your customer! *Use trade.gov CSL*



BEST PRACTICES TO AVOID RWAs!

- Identify the ECCN and provide a comprehensive list of all the technology to be transferred.
- Provide a complete description of the type of technology (e.g., blueprints, manuals, specifications, test reports, etc.).
- **Do not use** language such as:
 - “not limited to”
 - “may include”
 - “such as”
- Limit your description to only those technologies to be shared (i.e., do not put development technology in the description unless you are specifically asking for a license to export or reexport development technology).



BEST PRACTICES TO AVOID RWAs!

- Submit your application with a sufficient lead time
- Good preparation leads to timely license reviews and approvals
- Stay involved in the process
- Respond quickly and completely to requests
- Conditions are imposed to protect U.S. national security or other concerns
 - Anticipate and structure the transaction to limit the risk
 - Your proprietary concerns are similar to ours
- Compliance with license conditions is one of the costs of doing international business



STELA APPLICATION STATUS SCREEN

STELA

System for Tracking Export License Applications

ACN or Case Number*

Z1867689

Search

Reset

Application Information		
Type	ACN	Case Number
Export License Application	Z1867689	-
Registration Date	Review Status	Reopen Date
05/08/2025	PENDING	-
Reviewing Office		
OFFICE OF NATIONAL SECURITY AND TECHNOLOGY TRANSFER CONTROLS		
Reviewing Division		
SENSORS AND AVIATION DIVISION		



LICENSE TRACKING

BIS Tracking Tool

The online System for Tracking Export License Applications (STELA)

<https://snapr.bis.doc.gov/stela/>

Enter:

- Application Control Number (ACN) – The “Z” number; **or**
- Case number – The “D” number

DTSA Tracking Tool

USXports (detailed staffing information for DoD)

<https://usxports.gov/usx>

Enter the “Z” number



Amending Licenses

- BIS does not have an “amendment” process
- BIS can make limited changes to license during review process (cannot add parties)
- Material changes typically require a new “replacement” license
- Some changes (those identified in EAR §750.7(c)) do not require a replacement license, e.g.:
 - Certain changes in unit price or total value
 - Limited types of changes in intermediate consignees
 - Purchaser/Ult. Consignee address change in same country
 - Name changes not related to ownership changes, subject to an approved BIS advisory opinion



REMINDER OF KEY DIFFERENCES

ITAR

- Absolute requirement for license/other approval
- No country “groups”
- Multiple license forms
- Must have PO/other support documentation
- Multiple US parties on an authorization
- Must identify US freight forwarders

EAR

- Requirement for license/other approval is nuanced
- Tiered Country Groups
- Single license form
- PO not required as support documentation
- Only one US party
- Don’t identify US freight forwarders



SUMMARY

- Understand the license determination process
- Get a SNAP-R Account
- As with an ITAR license, your success is dependent upon telling a coherent story and providing sufficient detail
 - Answer the who, what, where, when, and why
 - Explain everything in plain English – spell out acronyms
- Read and follow Part 748
- Obtain and retain supporting documentation as applicable
- Don't fire and forget – Track your application



CONTACT INFORMATION

- ▶ Office of Exporter Services
 - ▶ Northern California: (408) 998-8806
 - ▶ Southern California: (949) 660-0144
 - ▶ Washington, D.C.: (202) 482-4811
 - ▶ ecdoexs@bis.doc.gov

- ▶ Regulatory Interpretation and Transition Guidance: Regulatory Policy Division,
rpd2@bis.doc.gov, 1-202-482-2440

- ▶ Encryption Help Line: (202) 482-0707

- ▶ www.bis.doc.gov
- ▶ www.export.gov/ecr
- ▶ <https://www.bis.doc.gov/index.php/online-training-room>
- ▶ www.export.gov/Legal-Considerations



QUESTIONS & ANSWERS