OBJECTIVE: To ensure that all export/reexport-related responsibilities in the company are clearly identified and assigned, and that the positions and incumbents are widely known, and that the list is routinely updated.

PROCEDURE: Initially, each company involved in the export or reexport of controlled items may wish to analyze its' current organizational structure and operations to determine the effective placement of these functions. All efforts should be made, where practicable, to assign export compliance responsibility separately from the sales or other function where a conflict of objectives may occur. Where possible, the organizational structure of the company should centralize the key export functions and coordinate export activities with other departments that may become involved in export-related issues (e.g., legal counsel, credit, shipping or contracts).

Personnel assigned export control functions should be given authority commensurate with their responsibilities. Formal lines of communication between the key personnel and others with export-related functions should be established. Areas to consider are:

customer service	international sales
marketing	contracts
finance and accounting	legal counsel
field services	export administration
order entry	shipping
traffic	web site technicians
physical security	information management specialists

engineering (particularly those involved in item classifications or who consult with customers overseas)
human resources (in those cases where you may have "deemed export" issues)

Once the export control responsibilities have been assigned, you may want to document the following information:

♦	An organizational chart identifying the employee(s)/position(s) responsible for each export/reexport responsibility.

♦	A list of the responsible personnel, identified by name and title. In order to ensure ongoing compliance in cases of absence, backup personnel should be formally assigned for all key export control related functions. Telephone numbers, e-mail addresses and mailing addresses should also be provided for these individuals. General export control responsibilities should be summarized.

♦	Identify the EMS Administrator (or persons with equivalent responsibilities) charged with

oversight of the EMS.

♦ List the company's overseas responsible personnel in the same manner.

COMMENTS: The exporter may accomplish these objectives in a variety of ways. The following is provided to assist in development:

♦ At large or medium-sized companies, the initial analysis of positions and individuals responsible for export compliance may include the development of an Export Control Unit.

♦ Information should be maintained in the form of lists and/or organizational charts. Use of lists are superior for presenting specific export control duties, while organizational charts are preferable for illustrating reporting lines and structures. A combination may be most practical. Responsible individuals should be identified by name and/or title.

♦ Policies, procedures and job descriptions should be written to ensure smooth transitions during personnel turnover. Of key importance during these events are the assignment of backup personnel. A backup should be identified for each position with export and compliance related responsibilities. This information should be promptly updated and disseminated when changes occur.

♦ Overseas contacts should be made aware of the name and position of the EMS Administrator. These companies should be encouraged to direct questions or problems to the Administrator as they arise.

The amount of detail provided in the list of responsible officials may depend on the size of the exporting company. At a small company, it is probably not necessary to go into a great amount of detail. However, at a large company that has many players involved in export control issues, or which faces significant employee turnover, it is very important to clearly identify responsible parties in detail and keep the information current.