January 29, 2012

Regulatory Policy Division
Bureau of Industry and Security, Room 2099B
U.S. Department of Commerce
Washington D.C. 20230

Subject: RIN 0694-XA37
Retrospective Regulatory Review Under E.O. 13563
Entity List: Enhance "Bad Actor" Identification

Thank you for providing an opportunity to submit suggestions for clarifying, streamlining or improving existing U.S. export regulations. This letter requests BIS to publish more complete and/or detailed address information on each of the entities that it sanctions in Supplement 4 to Part 744 of the EAR. At a minimum it would be helpful for exporters to know the city and state of the party– if the actual street address is not available or otherwise not suitable for publication.

Thankfully, this is a relatively minor issue for BIS. Over 90% of the current listings (including most if not all of the more recent additions) already publish city and/or state identifiers (if not the actual street address). However, for a relatively small and typically older subset this information is not in the public domain; and therefore, positive identification is not always assured. Positive identification of the "bad actors" is essential to prevent unauthorized transactions or to clear legitimate businesses or persons which have similar names.

The issues surrounding the positive identification of U.S. Government sanctioned parties are more acute in other Agencies such as: Treasury's OFAC specially designated parties and State's debarred parties. In addition to updating the small set of BIS entities for whom complete address information is not currently available, I would ask BIS to encourage other Agencies to match the level of information that BIS makes public.

Regards,

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