From: <terry.h.jones@l-3com.com>
To: PublicComments@bis.doc.gov
Date: Mon, Feb 7, 2011 2:53 PM
Subject: RIN 0694-AF03 (Federal Register / Vol. 75, No. 236) Dated Thursday, December 9, 2010 Proposed Rules

To whom it may concern:

L-3 Communications Corporation has completed its review of the proposed License Exception - Strategic Trade Authorization (STA) in Federal Register dated 9 December 2010 and offers the following comments:

* Based on L-3's review, the new proposed STA License Exception would only affect a small part of L-3's current licensing requirements for ECCN 0A987 products to Austria, Finland, Ireland , South Korea, Sweden, Switzerland and Ukraine and for ECCN 2A983 to Argentina, South Korea and Ukraine.
* L-3 agrees with the concept of decreasing licensing requirements for exports to countries deemed as partner nations. However, use of the License Application STA would cause new acknowledgements and certifications from the foreign recipients in addition to those already required under Parts 744 and 748. Another option would be to simply remove the license requirement from the Country Chart and not require a license to begin with as opposed to exceptions for the license requirement.

L-3 appreciates all the hard work to come up with lesser controls for most favored countries but feels that adding additional controls in order to use this exception is not the way to go. If you have any questions, please contact me at 703-236-7457 or email at terry.h.jones@l-3com.com <mailto:terry.h.jones@l-3com.com> .

Regards,

Terry

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