Huntington Ingalls Industries

February 3, 2012

U.S. Department of Commerce
Alexander Lopes
Office of Nonproliferation and Treaty Compliance
14th Street and Pennsylvania Avenue, NW
Washington, DC 20230

Subject: RIN 0694-AF39 - ECCN 8X620 Rule Comments

Dear Mr. Lopes:

Huntington Ingalls Industries, Inc. (HII) welcomes the opportunity to provide the following inputs to Federal Register Notice of Proposed Rule, dated December 23, 2011.

HII appreciates the efforts of the Department of Commerce in moving submersibles and related articles to a new proposed ECCN. However, the proposed changes will not substantially alter the licensing activity of HII with the Department of State. Although limited in regularity, it may ease the processing of hardware shipments of components and parts to US Navy units stationed internationally.

Additions to ECCN 8A620.y.

HII recommends the following items be considered for inclusion as a specific "part," "components," "accessories and attachments" in paragraph .y.

- Thermal insulation
- Firefighting equipment, fire suppression systems, extinguishers, water hoses
- Emergency water rescue equipment
- Non-structural bulkheads and flexible space arrangements
- Bunks, lockers, and living/recreational quarter facilities
- Meeting and classroom facilities
- Electrical cable, cableways, wire, tapes, distribution panels, circuit breakers, supply outlets, connectors, switches, and fixtures
- Fiber Optic cable, cableways, fixtures, switches, and supply outlets
- Equipment foundations and shock mounts
- Fasteners, washers, o-rings, bushings, adapters, couplings, bolts, and similar ancillary hardware
- Mountings and clamps (meant to keep computers, office furniture in place)

HII notes that ECCN 8A620.x and .y deviate from the other proposed changes supporting the Export Reform Initiative. These classifications do not support specific "part," "components," "accessories and attachments" for products found on the USML. Lower level products specially designed for Category XX vessels are meant to remain on the USML at Category XX(c). As such, it is recommended that in addition to the detail provided in Related Controls (1), a new Note 2 be added under .x to clarify that .x and .y are solely related to 8A620 and do not support any portion of the USML.

ECCN 8B620

HII respectfully requests the inclusion of USML Category XX as part of the ECCN. HII notes that neither this ECCN nor Category XX address coverage of "specially designed" equipment to produce items that fall within Category XX. HII believes that those items are best captured within this ECCN and suggests that language be added in the final rule to reflect the ECCN's coverage of Category XX equipment.

If you have any questions regarding these comments, please contact me at (228) 935-0518 or at sandra.cross@hii-co.com.

Sincerely,

Sandra R Cross
Corporate Director, International Trade Compliance
Huntington Ingalls Industries, Inc.