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-AF42 - ECCN 8X609 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 clarifying coverage of surface vessels in the proposed ECCN. In general, the proposed changes will move several of our licensing vehicles from the Department of State's ITAR to the EAR and allow for more efficient processing of hardware shipment exceptions. However, greater analysis will be required on a case-by-case basis for technical exchanges and assistance when involving foreign parties and products that exist on ECCN 8A609 which will ultimately be installed on a USML controlled Category VI vessel.

Additions to ECCN 8A609.y.

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

- Atmosphere control and monitoring equipment
- Environmental control and monitoring equipment
- Thermal insulation
- Trash handling systems
- Mooring, towing and dry dock equipment
- Anchoring systems
- Material corrosion and fouling control systems
- Damage control equipment
- Firefighting equipment, fire suppression systems, extinguishers, water hoses
- Emergency water rescue equipment
- Onboard cranes

- Non-structural bulkheads and flexible space arrangements
- Cargo doors
- Bunks, lockers, and living/recreational quarter facilities
- Meeting and classroom facilities
- Bridge screens, panels, and monitors
- 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)

ECCN 8E609.a

HII respectfully requests the replacement of control language *operation, installation, maintenance, repair or overhaul* with "use", a term already defined in the EAR.

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.