The Boeing Company
1200 Wilson Blvd
Arlington, VA 22209-1989

December 13, 2012

Special Agent Kirk Flashner
Office of Export Enforcement
Bureau of Industry and Security
U.S. Department of Commerce, Room 2099B
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

Subject: RIN 0694-AF59, Time Limit for Completion of Voluntary Self-Disclosure and Revised Notice of the Institution of Administrative Enforcement Proceedings

Dear Mr. Flashner:

The Boeing Company ("Boeing") welcomes the opportunity to comment on the referenced Proposed Rule.

Boeing finds the proposed changes to the Export Administration Regulations ("EAR") to be reasonable and appropriate. The Bureau of Industry and Security ("BIS") proposes the institution of a 180-day deadline in Section 764.5 for exporters to provide a thorough review and narrative account of a suspected violation. This provides adequate time for review and investigation. We note with appreciation that provision is made for extensions in certain circumstances. Fixed time limits for compliance processes enables exporters and the Office of Exporter Enforcement to efficiently perform diligence and conclude investigations.

BIS also proposes expanding the delivery options in EAR Section 766.3(b)(1) to include express mail, commercial courier, or other deliver services for providing notice of the issuance of a charging letter instituting an administrative enforcement proceeding. The proposed changes are sensible updates that expand BIS's ability to monitor delivery status.

Please do not hesitate to contact me if you have any questions or need additional information. I can be reached at (703) 465-3505 or via e-mail at stephanie.a.reuer@boeing.com.

Sincerely,

Stephanie A. Reuer
Director, Global Trade Controls