William Arvin

From: Matthew Lancaster <doublehulled@yahoo.com>
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To: PublicComments
Subject: RIN 0694–AF59

Regarding Voluntary Self-Disclosures (VSD), instead of setting a 180-day deadline for persons who have submitted an initial notification to complete and submit the final narrative report, consider setting a 60-day deadline with a liberal policy, attitude, and practice towards granting extensions. The rationale for this comment is twofold:

1) Align Bureau of Industry and Security (BIS) practices with respect to VSD with the Directorate of Defense Trade Controls (DDTC) practices with respect to Voluntary Disclosures (VD), and;
2) Make the VSD more visible and relevant to industry.

With respect to rationale 2) above, it is reasonable to assume industry may neglect a VSD inside the 180-day deadline. Giving a 60-day deadline lessens the impact of neglect. The VSD becomes an action item almost always requiring immediate attention and allocation of industry resources. If, however, a 60-day deadline is established, it is also reasonable to assume many VSD will not be finalized within the 60-day deadline. But if industry can be reasonably assured BIS will normally grant a 30-day extension to the 60-day deadline, it is likely few VSD will exceed a 90-day window from initial notification to closure, and exceedingly few will require a 180-day window from initial notification to closure. But BIS should be prepared to regularly grant 30-day extensions and, for some VSD, multiple 30-day extensions. The regular granting of 30-day extensions will most likely have an affect of heightening industry attention to closing VSD prior to requesting multiple extensions. As extensions approach 180 days, BIS can reduce the reasons for which any additional extension will be granted to the VSD through regular written communications to the submitter.

Best Regards,
Matthew J. Lancaster
Private Citizen