## Timothy Mooney

**From:** GlobalTradeCompliance <GTC@LORD.COM>
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**To:** PublicComments
**Subject:** comment: RIN 0694-AF17

General comment: There are a whole host of US companies who primarily deal in EAR99 EAR products, but also fall into the ITAR when they specially design or modify these parts/components for military. Therefore, there are many parts/components manufacturers who have never done Commerce licensing, and only know State/ITAR licensing & practices. Therefore, I think that it will be imperative for Commerce to post guidance and/or train specifically for this group of people I'm not talking about your basic outreach seminars, I'm talking about specific guidance for this group of people moving from the ITAR to the CCL, and how the concepts transfer

Small group of examples:

Definitional differences [ex. who the "end user" is – Commerce = OEM, State = OEM's customer, dual/third country nationals differences]

How to get the Commerce equivalent of a TAA (does it translate to a Commerce license for data? How do you include re-export approval for what DDTC calls "sublicensees"?)

How to get "program status" licenses from Commerce (a DDTC program for special licensing permissions for certain approved foreign aircraft programs)

"Foreign employment" licensing concept of State (State doesn't allow you to use an exemption applicable to an employee's home country...separate licensing always required)