Hawker Beechcraft

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Regulatory Policy Division,
Bureau of Industry and Security,
U.S. Department of Commerce,
Room 2099B,
14th Street and Pennsylvania Avenue NW.,
Washington, DC 20230.

Refer to RIN 0694–AF36

Dear Sir:

This letter is in response to the proposed USML categories suggested by the Department of State and Department of Commerce relative to Export Reform. Hawker Beechcraft, Inc. has reviewed the proposed USML definitions and have the following comments and questions regarding proposed changes to USML VIII (Aircraft and related items), in particular categories VIII(a)(3); VIII(h)(6); and VIII(h)(16).

The proposed changes include a revised definition of "aircraft" as it relates to USML Category VIII.

1. VIII(a)(3) Jet powered trainers used to train pilots for fighter, attack, or bomber aircraft.

    - **Please clarify what the term "jet powered" is intended to include/exclude. Is it intended to refer only to what most people think of as a "jet," which is an aircraft powered with a gas turbine engine without a propeller? Or, does it also include all turbine-engine airplanes, including turbojets, turbofans, and turboprops, which may use turbine engines to turn a propeller. The question has particular relevance to our company as the Pratt & Whitney PT-6 engine used in our T6 military trainer aircraft is a turbine and is a turboprop.**

2. VIII(h)(6) Aircraft components, parts, accessories, attachments, and associated equipment as follows: Bomb racks, missile launchers, missile rails, weapon pylons pylon-to-launcher adapters, UAV launching systems, and external stores support systems and parts and components "specially designed" therefor.

- **Is "external stores support systems" intended to include external fuel tanks, or is this intended only to cover external stores for weapons carriage and release?**

3. VIII(h)16) Fire control computers, mission computers, vehicle management computers, integrated core processers, stores management systems, armaments control processors, aircraft-weapon interface units "specially designed" for aircraft.

    - **Does the term "mission computers" include navigation computers and avionics?**

    - **What is the definition of "integrated core processor" and what does it include?**

    - **Do "stores management systems" include emergency jettison capabilities for external fuel tanks?**

In the event you have any questions regarding the content of this letter, please do hesitate to contact us.

Sincerely,

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Bobbi Erb

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