To Whom It May Concern,

L-3 Communication Corporations comments in reference to the Department of Commerce Federal Register Notice dated 7 November 2011 Proposed Revision to the Export Administration Regulations (EAR): Control of Aircraft and related items the President determines no longer warrant control under the USML as follows:

· The ITAR controls services related to military aircraft. Those aircraft are now being moved to the 600 Series under EAR. The Department of Commerce treats services based on the technology classification. If the aircraft is moved then it is no longer subject to the ITAR. No ITAR approval required Therefore, it is our understanding that if the technology does not require a license, the services once considered ITAR can then be provided without a license.

· ECCN 9X610.y (".y") will encompass specific types of commodities specially designed for a commodity subject to both the EAR ECCN 9A610 and USML Category VIII. The ".y" series will carry an AT1 control but will be defined differently than all other AT1 controlled items in the EAR. The ".y" series would be restricted under ITAR 126.1. Recommend that AT1 controls be treated the same throughout the EAR.

· This proposed rule states that it would affect the Simplified Network Application Processing + system (SNAP-R) but do not explain how it will be affected or the impact on the companies.

Regards,

Terry

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