The EADS Export Compliance Council ("EADS ECC") of the European Aeronautics Defence and Space, NV ("EADS"), hereby submits comments on the Bureau of Industry and Security ("BIS"), Department of Commerce ("DoC") proposed rulemaking wherein BIS seeks comments on the proposed changes to the Export Administration Regulations ("EAR") regarding:

• Additions to proposed paragraph (a)(13) in § 740.2;

• Changes to the proposed Note to paragraph (c)(1) in § 740.20;

• Changes to ECCNs 9A018, 9D018 and 9E018;

• Addition of new Category 9 600 series ECCNs to § 742.6(a)(1); and

• Changes in eligible users for 600 Series under License Exception STA in § 740.2(a)(13).

The EADS ECC respectfully urges the consideration of our comments and suggestions to the proposed rules.

Best Regards,

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