From: Oscar Gonzalez <oscarg@exportimportlaw.com>
To: PublicComments@bis.doc.gov
Date: Thu, Dec 9, 2010 4:35 PM
Subject: Notice of Inquiry--CCL

Dear BIS:

These are my comments regarding the BIS's notice in the Federal Register, Revising Descriptions of Items and Foreign Availability (76664 Federal Register/Vol. 75, No. 236).

To improve the CCL, first, keep your grammar and punctuation simple and consistent. It's often hard to figure out whether your item requires all conditions set out. Hire an editor, someone who is focused on making sure that even the average fourth grader could understand your descriptions.

Second, drop mysterious abbreviations and nonsensical definitions. There are tons of examples, N.E.S. among them. N.E.S. is the lazy way of saying, "well, this is category is perfect for that item you are exporting, unless there is a better one somewhere." Not exactly helpful.

Which brings us to the third improvement.

Provide rules of construction/interpretation. When there are dueling ECCNs, which ones should exporters choose? How about within a category? If rules of construction can be provided for the harmonized tariff, which dwarfs the CCL, there is no reason that they can't be provided for the CCL. The CCL has a hierarchy or two, right? Just set them out.

Thank you for the opportunity.

Oscar Gonzalez

Oscar Gonzalez, Attorney
oscarg@exportimportlaw.com
Phone: (214) 720-7720, ext 6
Cell: (469) 774-4793
Fax: (214) 720-6076
Gonzalez Rolon Valdespino & Rodriguez, LLC, Attorneys
International Trade • Customs • Export • Business • Corporate • Litigation • State and Federal Practice
www.exportimportlaw.com

Park Place Center, Suite 300
2911 Turtle Creek Boulevard
Dallas, Texas 75219

I am a lawyer. If I sent you this email by mistake or if you