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To: PublicComments@bis.doc.gov
Date: Mon, Dec 13, 2010 9:06 AM
Subject: ITAR Suggestion

From a UK perspective, I think that the list needs to be explained better.

Over here in the UK, we have the Export Control Organisation (with a similar function to your Department of Commerce and Department of State). This Department has developed a web based Goods Checker Tool to see where on the control lists the goods are rated. This could be linked to the 'tiering'.

To assist the Goods Checker, there is an OGEL (Open General Export Licence) Checker that can be used to find out which licences are suitable to the rating level of the item/technology.

Due to the wording of you control lists, I think an application like the UK Goods Checker would be invaluable.

With regards to tiering, I believe internal that insignificant components e.g. widgets, screws, sensors, etc that are specifically designed for military use should be put on the very lowest tier since these items alone could not pose any threat to the US. This is of particular interest to me the ITAR item that we deal with is used to counter any threats and not to impose them!

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Kind regards

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