February 7, 2011

Mr. Timothy Mooney
Office of Export Services
Regulatory Policy Division
Bureau of Industry and Security
Department of Commerce
1401 Constitution Avenue, NW
Room 2705
Washington, DC 20230
ATTN: Notice of Inquiry-CCL

Comments on Proposed Revisions to the CCL

Mr. Mooney:

We appreciate the opportunity to submit comments regarding the advance notice of proposed rule making titled Commerce Control List: Revising Descriptions of Items and Foreign Availability (Docket No. 101112562-0577-01), as published in the Federal Register December 9, 2010.

We offer the following comments for your consideration:

- Recommend removing domestic crude oil (ECCN 1C981) from the CCL for the following reasons:
  - Since domestic crude oil was first regulated, a mature global oil supply market has developed, providing economic access to crude oil supplies
  - The U.S. is now capable of importing crude oil supplies from world markets and currently imports about half of its requirements
  - Only about one-half of one percent of domestic crude oil production is currently being exported (mostly to Canada and Mexico)
  - Regulation provides no assurance of adequate supply

Very truly yours,

Charles E. Pierce, Esq.
Tax Counsel
American Petroleum Institute