February 7, 2011

Sent via email to: publiccomments@bis.doc.gov

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Office of Exporter Services
Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave, NW, Room 2705
Washington, DC 20230

RE: Federal Register: December 9, 2010 (Volume 75, Number 236, p. 76664)

ATTN: Notice of Inquiry CCL

This letter is being written to help document the foreign availability of thermal imaging cameras with performance specifications that, if manufactured and in and exported from the US, would cause them to be categorized under CCL 6A003.b.4.b and require an export license.

Of particular note are those cameras developed and manufactured in the Peoples Republic of China. There are three widely known manufacturers of thermal imaging cameras in China: Dali, Wuhan-Guide and SATIR. Information on their products is readily available on the web; some specific examples have been included below. Most, if not all, of these companies' cameras make use of uncooled infrared focal planes (UFPAs) manufactured by ULIS, of Grenoble, France (www.ulis-ir.com).

While changes to the US export regulations have eased license requirements for thermal imagers with frame rates of less than or equal to 9Hz, many choices of cameras are now readily available from the above China-based manufacturers with frame rates exceeding 9Hz (typically 50 to 60 Hz). This wide availability of cameras with frame rates greater than 9Hz places US exporters of thermal imagers at a competitive disadvantage and has completely obviated the effect of export controls on cameras with frame rates greater than 9Hz.

Respectfully submitted by:

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DALI

ZHEJIANG DALI TECHNOLOGY CO., LTD.

http://www.dali-tech.com:8080/en-Products.asp?TypeID=1

Example Models: TE-series (160x120, 50/60Hz)

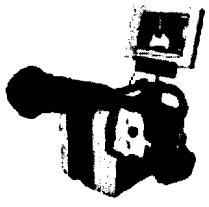
TEi-series (160x120, 50/60Hz)

DL700E+ (384x288, 50/60Hz)

http://www.dali-tech.com:8080/en-ProductInfo.asp?TypeID=1&ID=59

http://www.dali-tech.com:8080/en-ProductInfo.asp?TypeID=1&ID=63

http://www.dali-tech.com:8080/en-ProductInfo.asp?TypeID=1&ID=61



高德红外
GUIDE INFRARED

http://www.guide-infrared.com/Main.aspx?lang=en

http://www.guide-infrared.com/Category.aspx?lang=en&id=46

Example Models: MobIR M8 (160x120, 50/60Hz)

EasIR-4 (160x120, 50/60Hz)

EasIR-9 (384x288, 50/60Hz)

IR928+ (384x288, 50/60Hz)

ThermoPro TP8 (384x288, 50/60Hz)

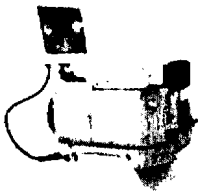
http://www.guide-infrared.com/Content.aspx?lang=en&id=10

http://www.guide-infrared.com/Content.aspx?lang=en&id=195

http://www.guide-infrared.com/Content.aspx?lang=en&id=447

http://www.guide-infrared.com/Content.aspx?lang=en&id=194

http://www.guide-infrared.com/Content.aspx?lang=en&id=308



SATIR

http://www.sat.com.cn/

http://www.sat.com.cn/?nav=products&language=en

Example Models: E8 series (160x120, 50/60Hz)

HotFind series (160x120, 50/60Hz)

HY-S280 (384x288, 50/60Hz)

HY-S380 (384x288, 50/60Hz)

HY-G90 (384x288, 50/60Hz)

HY-6800 (384x288, 50/60Hz)

HR-600 (640x480, 50/60Hz)

http://www.sat.com.cn/?nav=goods&language=en&pid=33&pro_id=115

http://www.sat.com.cn/?nav=goods&language=en&pid=33&pro_id=94

http://www.sat.com.cn/?nav=goods&language=en&pid=34&pro_id=81

http://www.sat.com.cn/?nav=goods&language=en&pid=34&pro_id=82

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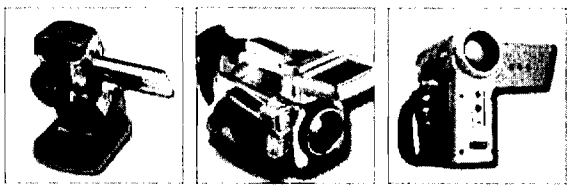
http://www.sat.com.cn/?nav=goods&language=en&pid=34&pro_id=84

http://www.sat.com.cn/?nav=goods&language=en&pid=35&pro_id=83