From: "Alcala, Raul A" <Raul.Alcala@nov.com>
To: PublicComments@bis.doc.gov
Date: Tue, Feb 8, 2011 7:54 AM
Subject: RE: EAR comments

In response to the request for comments (below), we have complied a list of comments and recommendations on how to improve the EAR.

1) When opening up the ASCII Format of any document for the online version of the EAR (http://www.access.gpo.gov/bis/ear/ear_data.html#ccl), expand the width of the entry to make it easier to read.

2) 2B999n covers austenitic stainless steel plate, valves, piping, tanks, and vessels. Austenitic stainless steel includes 304 and 316 stainless steel, which are explicitly called out in 2B999g. Thus a 304 or 516 plate, valve, pipe, tank, or vessel can technically have 2 correct ECCNs.

3) For Categories 4 & 8 "systems" is not a defined term.

4) 3A991j covers 'cells', but states that it does not control batteries. However there is a note that defines the term 'cell' as the basic building block of a battery.

5) 2A991a states "Ball bearings or Solid ball bearing (except tapered roller bearings)....". Should it read "Ball bearings or Solid roller bearing (except tapered roller bearings)..." instead?

As part of the President's export control reform initiative, the Bureau of Industry and Security (BIS) seeks public comments on how the descriptions of items controlled on the Commerce Control List (CCL) of the Export Administration Regulations (EAR) could be more clear and positive and "tiered" in a manner consistent with the control criteria the Administration has developed as part of the reform effort. The request for comments on how items on the CCL could be tiered includes a request for comments on the degree to which a controlled item provides the United States with a critical, substantial, or significant military or intelligence advantage; and the availability of the item outside certain groups of countries. Because of this latter aspect of the criteria for the tiers, BIS also requests comments on the processes and criteria BIS should employ to evaluate the availability information provided in response to this request. Comments are due by February 7, 2011.

Thank You,

Raul A. Alcala
Products & Materials Classification Officer
[cid:image001.gif@01CBC6C7.96EDCEB0]<http://www.nov.com/>
7909 Parkwood Circle Drive
Houston, TX 77036-6560
-Mobile (956) 451-9057
-Office (713) 346-7750
Raul.Alcala@nov.com<mailto:Raul.Alcala@nov.com>

CC: Kartapurkh.Khalsa@nov.com