From: "Spriggs, Donald R." <Donald_Spriggs@pas-technologies.com>
To: PublicComments@bis.doc.gov
Date: Mon, Jan 10, 2011 4:25 PM
Subject: "Notice of Inquiry - CCL

Dear Mr. Mooney,

We fully support the administration's Export Control Reform Initiative and a proposal to amend the list of export controlled items into three Control Tiers. Practically speaking for PAS Technologies and its aviation and power generation support services, we are of the opinion that the affected technology within our company would fall under Tier 3. We recognize that some judgment must be applied to the Tier classification, but if it can be shown (by documentation at the time a license is requested) that publically available (published, posted, or otherwise accessible) international prior art or process capability exists for a certain technology, then the classification is arguably Tier 3.

From the standpoint of item descriptions insofar as they describe PAS products and technology we find them to be generally adequate if the above proviso is applied.

Thank you.

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CC: TMOONEY@bis.doc.gov; Sandra_Keeney@pas-technologies.com