From: "Karla Herkert" <karla.herkert@t-online.de>
To: PublicComments@bis.doc.gov
Date: Thu, Feb 10, 2011 6:05 AM
Subject: WG: "Notice of Inquiry-CCL"

---- Ursprüngliche Nachricht-----
Von: Karla Herkert [mailto:karla.herkert@t-online.de]
Gesendet: Donnerstag, 10. Februar 2011 11:40
An: tmooney@bis.doc.gov
Betreff: "Notice of Inquiry-CCL"

Dear Mr. Mooney,

Export controllers worldwide appreciate the effort of BIS to make the "list of items" more positive.They like to focus the attention to a specifique ECCN, namely 2B230, that has undergone various changes in the last 20 years,from even more to less positive.See FR Vol.59, No.46 March 9,1994,10967.: "ECCN 1B151B Instruments designed for vacuum service that are capable of measuring absolute or differential pressures ---" Lateron "vacuum service" and "differential pressure" disappeared

from the list by letter,but are possibly still covered by the notion "capable of". It is known that differential pressure transducers can by some modification also be used as absolute pressure transducers. Other questions relate to absolute and differential vacuum pressure switches.Such switches sense the deflection of a diaphraghm due to an applied pressure, provide "an electrical signal" at a chosen pressure set point and activate vacuum valves,pumps, process controllers and so on.

In order to make things clear again after 20 years, it is proposed to add such a NOTE to 2B230:

a) 2B230 does (not) control differential pressure transducers.
b) 2B230 does (not) control absolute or differential pressure switches.

Control or No Control should be decided by The Nuclear Suppliers Group and unilateral ECCNs should be avoided.

Best Regards
from a former export controller
Bernhard Herkert
Karlstein, Germany