WIRE & WIRE ROPE DIVISION
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Timothy Mooney
Office of Exporter 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

Loos & Co., Inc. (CAGE 59157) is a manufacturer of wire rope and wire rope assemblies. The US Military is our largest customer. We are also dominant in the global commercial aviation industry.

We are one of a few manufacturers of US Military Specification wire ropes. These specifications are controlled by a Qualified Products List (QPL) which is controlled by the DLA, specifically the Defense Supply Center – Richmond.

The sale of bulk military specification wire rope is not of concern to us since this specification is the standard for the commercial aviation industry around the world. Its use in the commercial world far exceeds its U.S. Military use. It is so popular that Asian wire rope manufacturers claim to produce cables to the specification despite the fact that none of them are approved or listed in the QPL.

The area of our business that is somewhat grey is the fabrication of wire rope assemblies. There are many applications for wire rope assemblies in military use. They are used for everything from the wire rope that is on a hoist which is on the front of trucks to lanyards that secure a tag to a bomb. They are also used as flight controls in aircraft, on rescue winches on helicopters, and many, many other uses. The two primary Federal Supply Classes (FSC) that these products fall under are 1640 and 4010.

None of these uses are of a nature that would place our country at risk. Wire rope assemblies can be reverse engineered very easily since there are no proprietary secrets to their fabrication.

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We spend an inordinate amount of time screening every new customer whether they be U.S. companies or foreign companies to be compliant with ITAR regulations. Yes, some of our products might go into a Boeing or McDonnell-Douglas aircraft, onto a Multiple Launch Rocket Launcher (MLRS) or some other use that classifies it under ITAR.

The technology of wire rope and wire rope assemblies goes back to the early 1800's in Germany. Its first successful use in the U.S. was in 1842 when John A. Roebling (famous for designing the Brooklyn Bridge) made some rope for the State of Pennsylvania for use on the Allegheny Portage Railroad to haul rail cars up a mountain that were carrying barges over the mountains between Philadelphia and Pittsburg.

Certainly such an old technology should be removed from ITAR requirements. Wire rope manufacturing and fabricating companies are all over the world. China is currently the largest exporter of wire ropes and cables to the U.S. Other major wire rope fabricating countries include, S. Korea, Malaysia, Thailand, Germany, Israel, Turkey, Italy, Spain, India, UK, Austria, Poland, Brazil, Russia and the list goes on. There is no special technology in the wire rope industry that exists that cannot be duplicated elsewhere in the world.

Maybe if specific parts are actually sensitive they could be placed into a special FSC that would require special export control. This would be a lot easier to deal with than the current system which we go through.

Thank you for the opportunity for us to provide some input from the real world of manufacturing.

Sincerely,

Michael M. Wallace
Vice President of Sales & Marketing