Timothy Mooney

From: Charlie Auclair <Charliea@Electroimpact.com>
Sent: Tuesday, July 17, 2012 3:02 PM
To: PublicComments
Subject: Public comment 1. Electroimpact. C Auclair. 7.12.12

My company has a situation where our products have been classified under the EAR but due to their nature are also covered under the US munitions list under VIII.h

Now that these items covered under VIII.h are going to transition back to the EAR with the intent to place them in the new 600 series where will our parts end up?

We manufacture machines and tooling that are used for the manufacture of aircraft. Think big factory sized tooling not hand tooling. The tooling is specially designed for the aircraft being manufactured.

I'm pretty certain the machines should remain under 2B991 on the EAR.

The tooling has been determined under a ccats to be EAR99 when used on a commercial aircraft program....