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From: Charlie Auclair <Charliea@Electroimpact.com>
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To: PublicComments
Subject: Public comment 2. Electroimpact. C Auclair. 7.30.12

I'd like this to be considered as a public comment on the transition rule. Thank you.

My understanding from the presentations at the Update conference are that licensing for category VIII.h items will transition to a Commerce license from a State license and eliminate the TAA as a vehicle for approving multiple parties/countries/items/nationalities in one document. This was one (and as far as I can see the only) advantage to the State licensing process.

As an example I have a TAA that covers 1 aircraft program, 2 countries for export (1 group of 36 and 1 non-group of 36), 10 companies for exchange of technical data in 10 different countries (again non-36 and 36), and 15 nationalities. The licensing in Commerce could get quite ugly vs a TAA.

Is there any thought to streamlining or expanding the licensing process on Commerce's side to accommodate these situations?