

Export Compliance – the Rules and Exceptions that Apply to Aircraft Parts

2017 ASA Annual Conference
Workshop

Some Export Regulators

- **BIS – Bureau of Industry and Security**
 - Commerce Department office responsible for the regulation of most exports
- **DDTC – Directorate of Defense Trade Controls**
 - State Department office responsible for the regulation of exports of defense-related articles
- **OFAC - Office of Foreign Asset Control**
 - Treasury Department office responsible for certain additional export controls meant to advance particular interests of the United States

Sample Penalties for Violations

- **Civil/Administrative Penalties**
 - Up to \$250,000 or twice the amount of the transaction
- **Criminal Penalties**
 - Up to \$1,000,000 in fines and 20 years in prison
- **Other Penalties**
 - Removal of license
 - Denial of export privileges

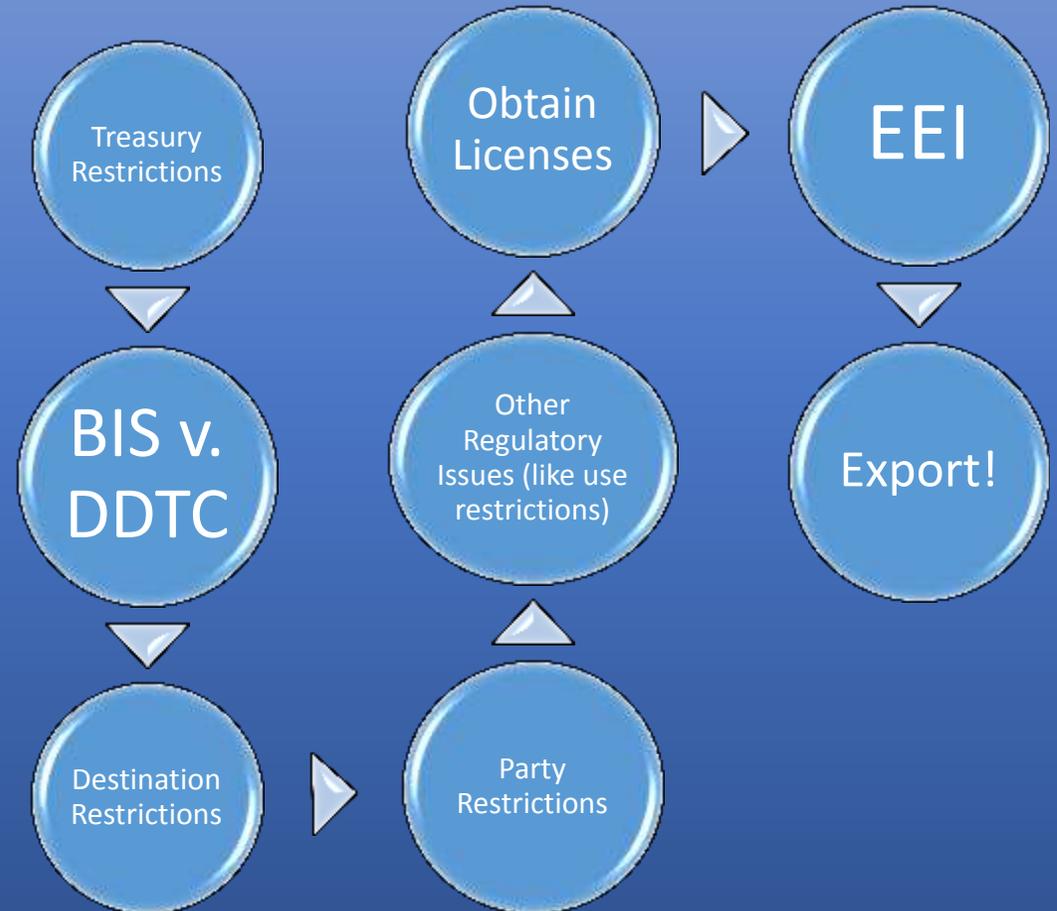
Definitions: Export

What is an export?

- Actual shipment or transmission of items out of the U.S.
 - Includes software
 - Includes technology
 - Can include technical documents in some cases
 - Includes repaired items!

Steps to Compliance

- Look at Treasury restrictions
- Identify whether the article is State or Commerce restricted
- Examine appropriate destination restrictions
- Check party-level restrictions
- Identify other regulatory issues
- Obtain licenses as necessary
- Document the transaction



Can I Transact Business Here At All?

Are there General Treasury
Restrictions that Regulate
Transfer of Assets?

Consolidated Screening List

- Commerce, State, and Treasury lists
- http://export.gov/ecr/eg_main_023148.asp
- If you have problems managing the consolidated list, then use the individual lists

Please note that lists and regulations are updated frequently by the government, and should be checked for each transaction

OFAC Lists

- **Sanctions Program List:**

- <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/Programs.aspx>

- **Specially Designated Nationals List:**

- <http://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>

Sample SDN Parties as of July 3, 2017

- Aero Caribbean Airlines
- Airfix Aviation
- Al-Naser Airlines
- Asian Aviation Logistics Company
- Aviation Capital Solutions
- Azza Air Transport
- Blue Sky Aviation
- Butembo Airlines
- Caspian Airlines
- Cham Wings Airlines
- Crimean State Aviation Enterprise
Universal-Avia
- Empresa Cubana de Aviacion
- Etihad Group of Afghanistan
- International Airline Consulting
- Iran Aviation Industries
- Kyrgyztransavia Airlines
- Malek Ashtar Aviation University
- Pouya Airlines
- Qods Aviation Industries
- Sky Blue Bird Aviation
- Syrian Arab Airlines
- Ukrainian-Mediterranean Airlines

Nations Restricted by OFAC Sanctions

Current as of July 3, 2017

- Balkans
- Belarus
- Burundi
- Central African Republic
- Congo (Dem. Rep. of)
- Cuba**
- Iran**
- Iraq
- Lebanon
- Libya
- North Korea
- Russia (Magnitsky)
- Somalia
- South Sudan
- Sudan
- Syria
- Ukraine/Crimea/Russia
- Venezuela
- Yemen
- Zimbabwe

Expired Sanctions Programs

- In 2016, these sanctions programs ended:
 - Burma (Myanmar) (October 7)
 - Cote d'Ivoire (Sept 14)

Iran and Cuba

- There are special agreements that addresses shipping aircraft and aircraft parts to Iran and Cuba
 - You must get an OFAC license for Iran
 - You must get a BIS license for Cuba
- Covers parts and repairs to ensure the safe operation of commercial passenger aircraft in Iran
 - No military and no cargo aircraft for Iran
- Covers parts and repairs to ensure the safety of civil aviation in Cuba
 - No military for Cuba

Exception: Treasury Licenses

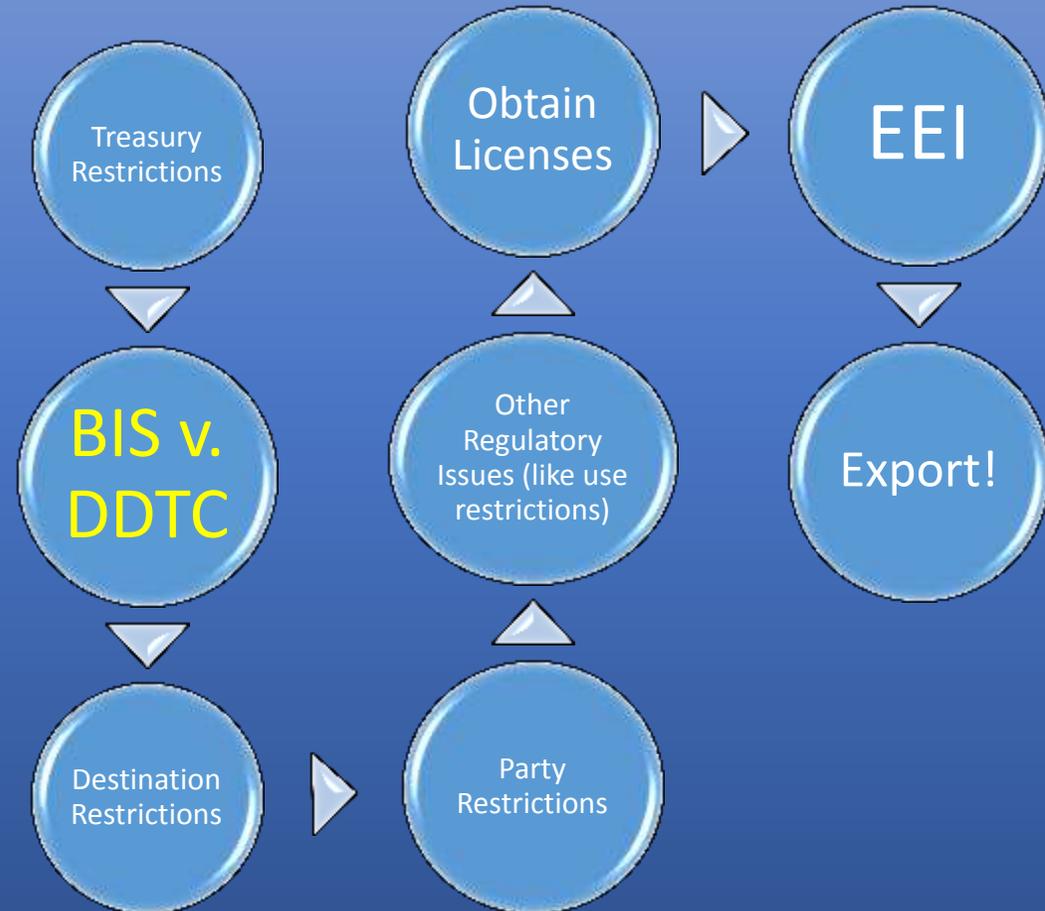
- A general OFAC license authorizes certain transactions without the filing of an application with OFAC
 - Example: An OFAC general license permits shipping aircraft parts to Cuba if BIS has licensed the transaction
- A specific OFAC license is issued on a case-by-case basis, and authorizes an activity that would otherwise be prohibited by the embargo or sanctions program
 - Example: 31 C.F.R. § 560.528 permitted licenses on a case-by-case basis for export / reexport to Iran to support safety of civil aviation and safe operation of U.S.-origin commercial passenger aircraft

Exception: Treasury Licenses

- You may also need to apply for release of blocked funds
- Online summary of OFAC laws and regulations:
 - <http://www.treasury.gov/resource-center/sanctions/Documents/facei.pdf>

Steps to Compliance

- Identify whether the article is State or Commerce restricted



A Structured Approach to Exporting: Second Step

BIS vs. DDTC

- Distinguish the U.S. Department with jurisdiction
 - Is it a US Munitions List Item?
 - Defense articles (many dual-use items have been removed from the USML!!)
 - Check ITARs
 - State has export jurisdiction
 - Otherwise subject to BIS restrictions
 - Check the ECCN and the BIS regulations
 - Commerce has export jurisdiction

It's Not About ITAR, Anymore!

- As of October 15, 2013 a significant change to the export regulations removed many articles from the ITARs and move them to the Commerce Department's regulations
 - Most dual use items are transferred to Commerce
 - Non-aviation items may not be affected by this change
 - This is for parts ... many defense aircraft remain on the USML

Examples of USML Aircraft Articles

- Certain articles (and their subcomponents) that are specially designed for USML/9A610-controlled aircraft:
 - Inertial Navigation Systems (INS)
 - Inertial Measurement Units (IMUs)
 - Attitude and Heading Reference Systems (AHRS)
- Parts for DoD-funded developmental aircraft
- Parts for B-1B, B-2, F-15SE, F/A-18E/F/G [*parts for earlier models are subject to the EAR*], F-22, F-35, F-117
- Parts found in a positive list
 - Published at 22 C.F.R. 121.1 - VIII(h)
 - Articles with defense-specific purposes, like threat-adaptive flight control systems, wing folding systems, etc.

Defense Item Analysis: What Next?

- If it is regulated by State Department
 - Register with State Department
 - Assess whether particular State Department Restrictions apply
 - Obtain appropriate licenses

- Most civil aircraft parts will not be subject to the ITARs

But What if it is Not a Munitions List Item?

If State Doesn't Regulate It, Then Commerce Might
Most Civil Aircraft Articles will Fall Within Commerce's
Jurisdiction

Is it Regulated by the Commerce Department?

- What am I exporting? Is it classified under the Commerce Control List (CCL)?
 - <http://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl>
- Examples:
 - *CCL 2 - Material processing (e.g. bearings)*
 - *CCL 3 - Electronics*
 - *CCL 7 - Avionics*
 - *CCL 9 – Aerospace and Propulsion*

Cracking the Code: Export Commodity Classification Numbers

- Determine ECCN
 - Peruse the CCLs for ECCNs that describe your export
 - Alphabetical index to the CCL provides some help:
http://www.bis.doc.gov/policiesandregulations/ear/ccl_index.pdf
 - Ask the manufacturer
 - Online via the Simplified Network Application Process:
<http://www.bis.doc.gov/snap/index.htm>

b. Off highway wheel tractors of carriage capacity 9 mt (20,000 lbs) or more; and parts and accessories, n.e.s.

c. On-Highway tractors, with single or tandem rear axles rated for 9 mt per axel (20,000 lbs.) or greater and specially designed parts.

9A991 "Aircraft", n.e.s., and gas turbine engines not controlled by 9A001 or 9A101 and parts and components, n.e.s.

License Requirements

Reason for Control: AT, UN

Control(s) Country Chart

AT applies to entire entry AT Column 1

UN applies to 9A991.a See § 746.1(b) for UN controls.

License Requirement Notes: There is no de minimis level for foreign-made aircraft described by this entry that incorporate commercial primary or standby instrument systems that integrate QRS11-00100-100/101 or commercial automatic flight control systems that integrate QRS11-00050-443/569 Micromachined Angular Rate Sensors (see §734.4(a) of the EAR).

License Exceptions

LVS: N/A
GBS: N/A
CIV: N/A

List of Items Controlled

Unit: Number
Related Controls: QRS11 Micromachined Angular Rate Sensors are subject to the export licensing jurisdiction of the U.S. Department of State, Directorate of Defense Trade Controls, unless the

QRS11-00100-100/101 is integrated into and included as an integral part of a commercial primary or standby instrument system of the type described in ECCN 7A994, or aircraft of the type described in ECCN 9A991 that incorporates such a system, or is exported solely for integration into such a system; or the QRS11-00050-443/569 is integrated into an automatic flight control system of the type described in ECCN 7A994, or aircraft of the type described in ECCN 9A991 that incorporates such a system, or are exported solely for integration into such a system. (See Commodity Jurisdiction requirements in 22 CFR Part 121; Category VIII(e), Note(1)) In the latter case, such items are subject to the licensing jurisdiction of the Department of Commerce. Technology specific to the development and production of QRS11 sensors remains subject to the licensing jurisdiction of the Department of State.

Related Definitions: N/A
Items:

a. Military aircraft, demilitarized (not specifically equipped or modified for military operation), as follows:

a.1 Cargo aircraft bearing "C" designations and numbered C-45 through C-118 inclusive, C-121 through C-125 inclusive, and C-131, using reciprocating engines only.

a.2 Trainer aircraft bearing "T" designations and using reciprocating engines or turboprop engines with less than 600 horsepower (s.h.p.).

a.3 Utility aircraft bearing "U" designations and using reciprocating engines only.

a.4 All liaison aircraft bearing an "L" designation.

a.5 All observation aircraft bearing "O" designations and using reciprocating engines.

b. "Civil aircraft";

Note: Specify make and model of aircraft and type of avionic equipment on aircraft.

c. Aero gas turbine engines, and specially designed parts therefor.

Note: 9A991.c does not control aero gas turbine engines that are destined for use in civil "aircraft" and that have been in use in bona fide civil "aircraft" for more than eight years. If they have been in use in bona fide civil "aircraft" for more than eight years, such engines are controlled under 9A991.d.

d. Aircraft parts and components, n.e.s.

e. Pressurized aircraft breathing equipment, n.e.s.; and specially designed parts therefor, n.e.s.

9A992 Complete canopies, harnesses, and platforms and electronic release mechanisms therefor, except such types as are in normal sporting use.

License Requirements

Reason for Control: AT

Control(s) Country Chart

AT applies to entire entry AT Column 1

License Exceptions

LVS: N/A
GBS: N/A
CIV: N/A

List of Items Controlled

Unit: Number
Related Controls: N/A
Related Definitions: N/A
Items:



The list of items controlled is contained in the ECCN heading.

B. TEST, INSPECTION AND PRODUCTION EQUIPMENT

9B001 Equipment, tooling and fixtures, specially designed for manufacturing gas turbine blades, vanes or "tip shroud" castings, as follows (see List of Items Controlled).

License Requirements

Reason for Control: NS, MT, AT

Control(s) Country Chart

NS applies to entire entry NS Column 1

MT applies only to equipment for engines that meet the characteristics described in 9A001

AT applies to entire entry AT Column 1

License Requirement Notes: See §743.1 of the EAR for reporting requirements for exports under License Exceptions.

License Exceptions

LVS: \$5000, except N/A for MT
GBS: Yes, except N/A for MT
CIV: Yes, except N/A for MT
STA: License Exception STA may not be used to ship commodities in 9B001.b to any of the eight destinations listed in § 740.20(c)(2) of the EAR.

List of Items Controlled

Unit: \$ value
Related Controls: For specially designed

9A991 “Aircraft”, n.e.s., and gas turbine engines not controlled by 9A001 or 9A101 and parts and components, n.e.s.

License Requirements

Reason for Control: AT, UN

<i>Control(s)</i>	<i>Country Chart</i>
AT applies to entire entry	AT Column 1
UN applies to 9A991.a	See § 746.1(b) for UN controls.

License Requirement Notes: *There is no de minimis level for foreign-made aircraft described by this entry that incorporate commercial primary or standby instrument systems that integrate QRS11-00100-100/101 or commercial automatic flight control systems that integrate QRS11-00050-443/569 Micromachined Angular Rate Sensors (see §734.4(a) of the EAR).*

General Aircraft Parts ECCN

- **Other aircraft parts/equipment not covered under another ECCN are ECCN 9A991**
- Demilitarized items are restricted from export to Iraq, North Korea and Rwanda due to UN embargos
- Such items are restricted from export to some countries under anti-terrorism restrictions
 - Column AT1 on the CCL country chart
 - Current restrictions include: Sudan (by chart) and Cuba, Iran, North Korea, and Syria (by rule)

Examples of Avionics ECCNs

Item	ECCN
• Avionics software	—7D994
• GPS	—7A005, 7A105
• Gyros	—7A002, 7A102
• INS and other inertial systems	—7A003
• Non-INS navigation instruments	—7A103
• Nav-Comm Systems <u>Technology</u>	—7E994
• Other nav/comm equipment not covered under another ECCN	—7A994

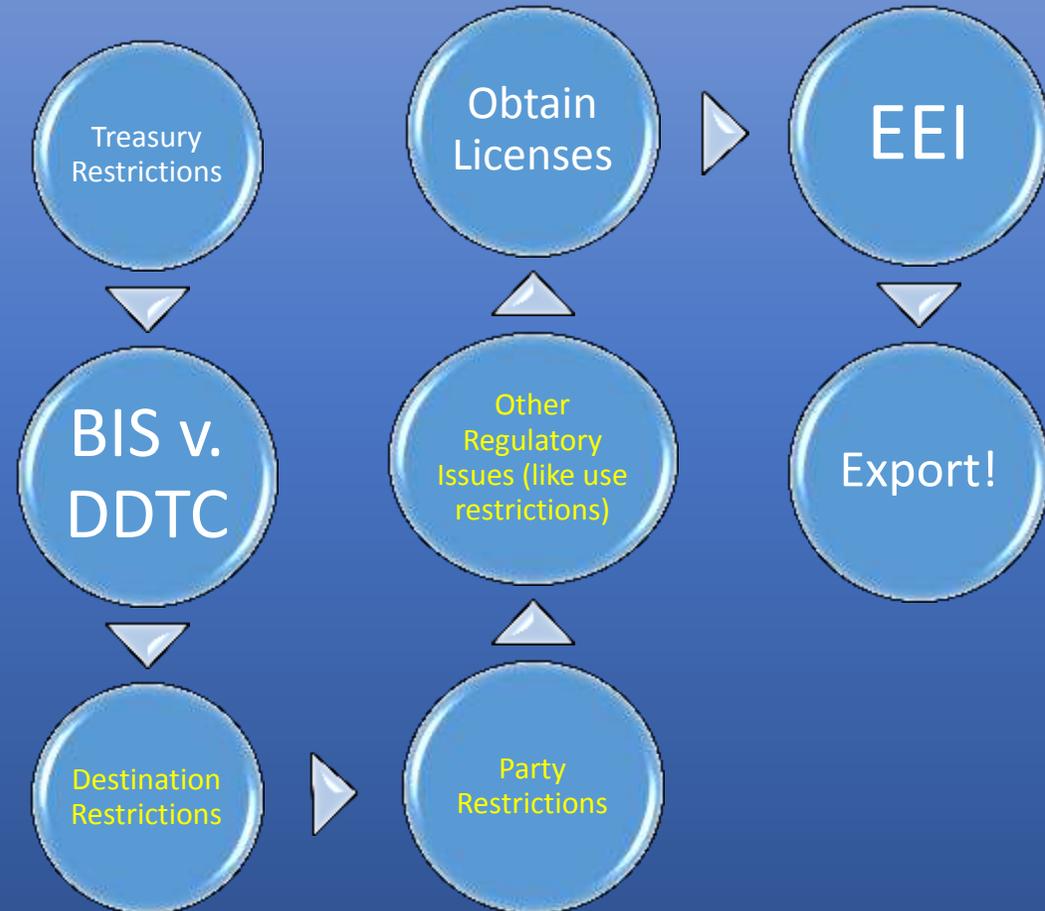
“600 Series” ECCNs for Articles Formerly Controlled Under the USML

Item	ECCN
• Military gas turbine engines	—9A619
• Post-1946 aircraft designed for military use but not ITAR controlled	—9A610
• Articles specially designed for controlled aircraft	—9A610
• <i>Military commodities outside the US that are derived from “600 series” controlled content</i>	—0A919

600 Series ECCNs are ineligible for certain license exceptions

Steps to Compliance

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- Examine appropriate destination restrictions
- Check party-level restrictions
- Identify other regulatory issues
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Do You Need a Commerce Department License?

- Check the specific reasons for control in CCL
- Check the Export Control Country Chart (cross reference country and reason for control):
 - http://www.bis.doc.gov/policiesandregulations/ear/738_supp1.pdf
- If there is an “X” in the cross-reference, then you need a Commerce license for export

9A991 “Aircraft”, n.e.s., and gas turbine engines not controlled by 9A001 or 9A101 and parts and components, n.e.s.

License Requirements

Reason for Control: AT, UN

<i>Control(s)</i>	<i>Country Chart</i>
AT applies to entire entry	AT Column 1
UN applies to 9A991.a	See § 746.1(b) for UN controls.

License Requirement Notes: *There is no de minimis level for foreign-made aircraft described by this entry that incorporate commercial primary or standby instrument systems that integrate QRS11-00100-100/101 or commercial automatic flight control systems that integrate QRS11-00050-443/569 Micromachined Angular Rate Sensors (see §734.4(a) of the EAR).*



Commerce Country Chart

Reason for Control

Countries	Chemical & Biological Weapons			Nuclear Nonproliferation		National Security		Missile Tech	Regional Stability		Firearms Conventi on	Crime Control			Anti-Terrorism	
	CB 1	CB 2	CB 3	NP 1	NP 2	NS 1	NS 2	MT 1	RS 1	RS 2	FC 1	CC 1	CC 2	CC 3	AT 1	AT 2
	Spain ³	X					X		X	X						
Sri Lanka	X	X		X		X	X	X	X	X		X		X		
Sudan ¹	X	X		X		X	X	X	X	X		X		X	X	X
Suriname	X	X		X		X	X	X	X	X	X	X		X		
Swaziland	X	X		X		X	X	X	X	X		X		X		
Sweden ^{3,4}	X					X		X	X			X		X		
Switzerland ^{3,4}	X					X		X	X			X		X		
Syria	See § 746.9 of the EAR to determine whether a license is required in order to export or reexport to this destination.															
Taiwan	X	X	X	X		X	X	X	X	X		X		X		
Tajikistan	X	X	X	X		X	X	X	X	X		X	X			
Tanzania	X	X		X		X	X	X	X	X		X		X		
Thailand	X	X		X		X	X	X	X	X		X		X		
Timor-Leste	X	X		X		X	X	X	X	X		X		X		

Do You Need a Commerce Department License?

- What will the importer do with it? Certain end-uses are restricted:
 - <http://www.bis.doc.gov/policiesandregulations/ear/744.pdf>
 - Rocket systems and unmanned air vehicles may require licensing
 - These restrictions may drive a need to check third party country of registry and control (see “where is it going”)
- What else does the receiver do? Certain types of conduct are prohibited without BIS license
 - Supporting design, development or production of missiles or nuclear explosive devices or chemical weapons or biological weapons
 - Supporting (through financing or logistics) a transaction that would violate the licensing provisions if performed, directly
- Who will receive it? Check the BIS prohibition lists ...

Denied Parties

- Department of Commerce's Bureau of Industry and Security (BIS) lists:
 - Denied Persons List
 - <http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/denied-persons-list>
 - Denied Entities List
 - <http://http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/entity-list>



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- Lists of Parties of Concern**
- Lists of Parties of Concern
 - Denied Persons List
 - Entity List
 - Unverified List
 - Consolidated Screening List

The Denied Persons List

Note: Where the Expiration Date is blank the denial order has no expiration.

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Last Modified: May 21, 2015

Name and Address	Effective Date	Expiration Date	Type of Denial
	11/30/-0001		Non Standard

Appropriate Federal Register Citations:

A. ROSENTHAL (PTY) LTD.
 P.O. BOX 44198, 65 7TH STREET, DENMYR BUILDING, LINDEN, ZA, 2104
 08/08/1997 08/08/2017 Standard

Appropriate Federal Register Citations: 62 F.R. 43503 8/14/97

A. ROSENTHAL (PTY) LTD.
 P.O. BOX 97 292 INDEPENDENCE AVENUE, WINDHOEK, NA
 05/20/1997 05/29/2017 Standard

Sample BIS Denied Persons and Entities as of July 3, 2017

- Aeolian Airlines
- Aerostar Asset Management
- Cham Wings Airlines
- Kish Airlines
- Sahand Airlines
- Sky wings Airlines
- Ukrainian-Mediterranean Airlines
- United African Airlines
- Vertir Airlines
- Veteran Airline
- Zagros Airlines

What Is Denied?

- Denied Persons may NOT participate in any way in any transaction involving the export from the United States of any commodity, software or technology subject to Export Administration Regulations (EAR)
 - No license transactions
 - No negotiations
 - No benefit from any export transaction
 - May not be the principal nor the agent in an export transaction
 - No facilitation of exports
 - No facilitation of acquisition of an export item
 - No procurement of items from the US for servicing

IDENTIFY “RED FLAGS”

- ‘Red flags’ have been designated by the BIS to illustrate the types of circumstances that should cause reasonable suspicion that a transaction will violate export regulations
- Examples of ‘Red flag’ situations:
 - The customer or its address is similar to one of the parties found on the Commerce Department's [BIS's] list of denied persons
 - Unusual fact pattern leads to a suspicion of illegal conduct

Unverified Persons or Entities

- Consult the Department of Commerce's Bureau of Industry and Security (BIS) lists:
 - **Unverified List** (foreign persons who raise automatic "red flags" because of past verification issues)
 - <http://www.bis.doc.gov/index.php/policy-guidance/lists-of-parties-of-concern/unverified-list>

What to Do if there is a Red Flag

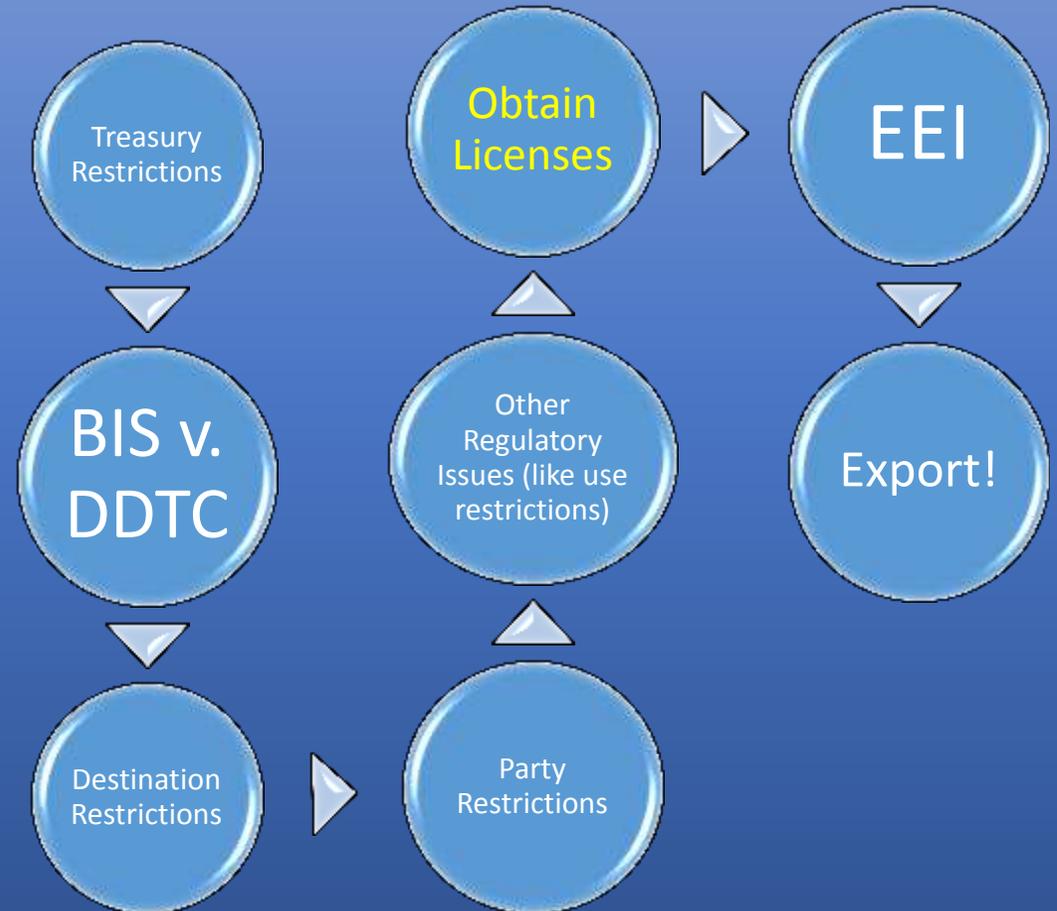
- The exporter **MUST** inquire about the end-use or end-user or ultimate country of destination
- If you encounter a piece of information in the course of your dealings with the customer that raises a red flag:
 - Refrain from the transaction, OR,
 - Contact a regional BIS enforcement office. Office addresses & phone #s provided at: <http://www.bis.doc.gov/about/programoffices.htm>

What to Do if there is a Red Flag

- Voluntary anonymous reports of export issues may be made to:
 - <https://www.bis.doc.gov/forms/eeleadsntips.html>
- If you can adequately confirm that the red flag does not represent an actual legal issue or violation, then you may proceed with the transaction
 - Use documents and keep them on file
 - Do not turn your back or become “willfully blind” to issues

Steps to Compliance

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- Obtain licenses as necessary
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Do You Need a BIS License?

- BIS Licenses:
 - A relatively small percentage of total US exports and re-exports require a BIS license
 - Licenses can be used to overcome exclusions
- Apply for licenses using SNAP-R

Re-Export Concerns

- If a customer intends to re-export a licensed product, the customer may need a license
 - Commerce
 - The *de minimis* rule excepts anything with less than 25% US content (10% to category D:1 nations) - Otherwise, re-export is subject to US export rules
 - Further limits may apply to Series 600 items
 - Read exceptions carefully – some of them apply to exports but not to re-exports!!
 - State
 - Defense-related articles from the USML must always be licensed for re-export

Short-Circuiting the License Process

- Obtaining a license takes time
- This is inconsistent with AOG service
- There are certain exceptions that can sidestep licensing requirements and can be very useful for AOG situations

BIS License Exceptions: Replacement of Parts (RPL)

- One-for one replacement of parts or servicing and replacement of equipment, e.g. exchange agreements.
 - Aircraft must have been legally exported in the first place - you must confirm the appropriate authority for the original transaction if you were not the aircraft exporter
 - Check the original license to make sure that there are no restrictions on replacement parts exports!
 - SAME part number – no improvements/upgrades
 - Obtain the core or confirm its destruction

BIS License Exceptions: Servicing (RPL)

- If an item is returned to the US for inspection, testing, calibration or repair (including overhaul and reconditioning)
 - No improvements or changes to basic characteristics
 - Only applies to group D:1 nations if you were the original licensed exporter and end-use has not changed
 - Does not apply to group E:1 nations
 - See country group listings at:
http://www.bis.doc.gov/index.php/forms-documents/doc_download/944-740-sup-1

BIS License Exceptions: Civil Aircraft (AVS)

- If the aircraft on which the part is to be installed is identified, then you should consider the following:
 - The country in which the aircraft is located, and
 - The country in which the aircraft is registered, or will be registered in the case of an aircraft being manufactured, and
 - The country, including a national thereof, which currently owns, controls, leases, and/or charters the aircraft

BIS License Exceptions: Civil Aircraft (AVS)

No License Required!

- Exports of equipment and spare parts for
 - Permanent use on an aircraft of any registry
 - Except an aircraft registered in a forbidden country, or owned or controlled by, or under charter or lease to, a forbidden country or a national of a forbidden country
 - The specific aircraft must be identified so you can verify its eligibility
 - Forbidden countries are Cuba and those in group D:1

BIS License Exceptions (AVS)

No License Required!

- Exports of equipment and spare parts to U.S. or Canadian airlines' installations or agents
 - Intended for maintenance, repair, or operation of US/Canadian-registered aircraft (but the specific aircraft need not be identified at the time of order)
 - Must not be located in (category D1) forbidden country
 - Ordered by the airline and sent to its own installation or agent

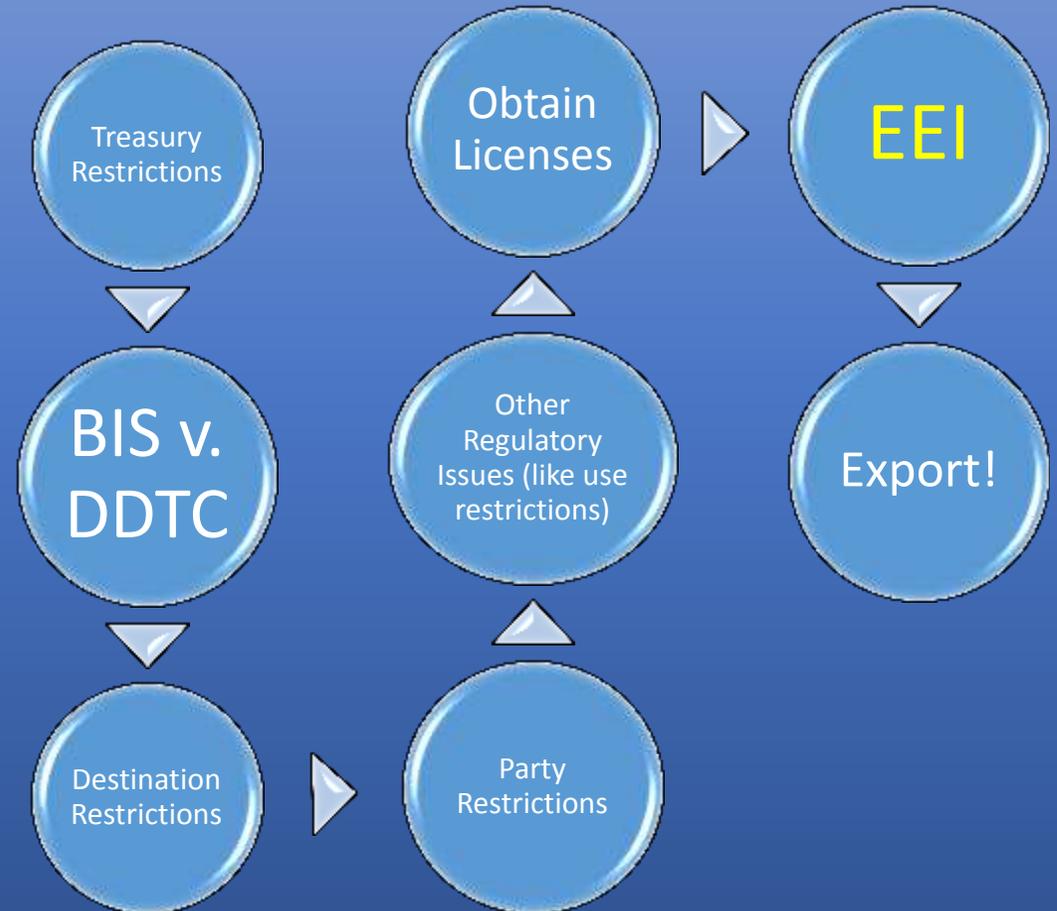
BIS License Exceptions (AVS)

No License Required!

- Exports to a specific U.S. or Canadian registered aircraft for AOG
 - Intended for maintenance, repair, or operation of US/Canadian-registered aircraft *in extreme need*
 - Aircraft must be at an airport NOT in Cuba nor a category D:1 forbidden country (except China)
 - AES record must be filed **unless** article exported by a US air carrier for their own use
- Includes foreign air carrier aircraft of US or Canadian registry

Steps to Compliance

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- Document the transaction



Don't Forget the "Paperwork"

Electronic Export Information

- Where do you file?
 - Previously filed on-line: <http://www.aesdirect.gov>
 - AESDirect has been moved into the Automated Commercial Environment (ACE): <https://ace.cbp.dhs.gov/>

Don't Forget the "Paperwork"

Electronic Export Information

- When must you file? Generally,
 - If the export is licensed
 - If the export is subject to ITAR restrictions
 - If the export is valued at \$2,500 or more (*per schedule B number*)
- If you are shipping through a freight forwarder, then absent a special *agency* agreement, you (as *USPPI*) are usually expected to file the EEI

Destination Control Statement (DCS)

Harmonized DCS for all export transactions (as of November 15, 2016):

“These items are controlled by the U.S. Government and authorized for export only to the country of ultimate destination for use by the ultimate consignee or end-user(s) herein identified. They may not be resold, transferred, or otherwise disposed of, to any other country or to any person other than the authorized ultimate consignee or end-user(s), either in their original form or after being incorporated into other items, without first obtaining approval from the U.S. government or as otherwise authorized by U.S. law and regulations”

- Goes on the commercial invoice (only)
- In addition, the DCS should show the ECCN for any 9×515 or ‘600 series’ (nx6nn) items being exported

Don't Forget the "Paperwork"

What do you do with the information, afterwards...

- Put the ITN on your transactional documents
- Keep copies of your documents for at least five years, including:
 - EEI,
 - Shipping documents (like AWBs),
 - Invoices,
 - Orders (e.g. P.O.s or email orders),
 - Packing lists,
 - Correspondence, and
 - any other relevant information bearing upon the export transaction

Questions?



Please feel free to ask questions



Thank You

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