



DEFENSE TRADE NEWS

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Fresh Start For The '90s

New Organization Replaces OMC

On January 8, 1990, the State Department created the Center for Defense Trade in the Bureau of Politico-Military Affairs (PM), replacing the Office of Munitions Control. The Center is comprised of two offices--the Office of Defense Trade Controls and the Office of Defense Trade Policy.

The Department's purpose in creating the Center for Defense Trade is to provide improved export licensing services and defense trade policy guidelines to U.S. defense industry. Together, these two new offices and the leader-

ship of the Bureau of Politico-Military Affairs will work to achieve that aim.

At this critical time of decreasing defense procurement, increasing global competitiveness in defense trade, and dramatic global political change, the Department decided a fresh start had to be made at the former Office of Munitions Control (OMC). The management team and the entire staff at the new Center for Defense Trade are committed to making that fresh start, and doing so quickly. We hope you let us know how we are doing.

CENTER FOR DEFENSE TRADE

Organizational Chart

Assistant Secretary of State for Politico-Military Affairs
Richard A. Clarke

Deputy to the Assistant Secretary and
Director of the Center for Defense Trade
Charles A. Duelfer

Deputy to the Center Director, Pamela L. Frazier

Office of Defense Trade Controls (PM/DTC)

Director, William B. Robinson

Deputy Directors,
Michael T. Dixon & Richard A. Levy

Chief, Arms Licensing Division,
Rose Marie H. Biancaniello

Chief, Compliance Analysis Division,
Clyde G. Bryant, Jr.

Office of Defense Trade Policy (PM/DTP)

Director, Robert S. Pace

Deputy Director, W. Scott Miller, III

New and old faces. The Center for Defense Trade incorporates both familiar and unfamiliar faces--in the PM "front office," in the Controls Office, and in the Policy Office.

Richard A. Clarke heads the Bureau of Politico-Military Affairs, confirmed as Assistant Secretary of State for Politico-Military Affairs on August 4, 1989. Clarke immediately set as one of his highest priorities transforming OMC into a much larger Center for Defense Trade. In addition to overseeing the Center for Defense Trade, Clarke's area of responsibility includes the various arms control negotiations, proliferation issues, and regional security relations, including security assistance. Prior to this position, Clarke was the Deputy Assistant Secretary of State for Regional Analysis in the Bureau of Intelligence and Research.

Charles A. Duelfer is the Director of the Center for Defense Trade, and Assistant Secretary Clarke's Deputy for Defense Trade. Duelfer's position is new, created by PM to provide full-time, front office leadership on commercial defense trade issues. Before assuming this position, Duelfer served as Director of PM's Office of International Security Policy for 5 years. In that job, he directed PM's activities in regional security issues, such as insurgency/counter-insurgency programs, base negotiations, crisis management, and bilateral security arrangements.

Before coming to State, Duelfer worked at the Office of Management and Budget's National Security Division where he was responsible for strategic, communications, and space Defense programs. In his 5 years at OMB, he worked extensively with both Defense contractors and DoD program managers on such systems as MX, ASAT, FLTSATCOM, and B-1, as well as an assortment of C3I programs. Prior to his government service, Duelfer worked on a private space launch venture.

Pamela L. Frazier is Deputy Director of the Center. Frazier brings 15 years of government experience on defense trade and technology transfer issues to the front office. Before coming to the Center, she was Deputy Director of PM's Office of Security Assistance and Sales, where she managed State's foreign military assistance programs. Prior to that, Frazier was Deputy Director of PM's Office of Strategic Technology Affairs, working a variety of CO-COM and bilateral technology programs. Before joining PM, Frazier served on the National Security Council Staff, where she worked on strategic trade issues.

The Office of Defense Trade Controls (PM/DTC) is the former Office of Munitions Control, regulating the export of U.S. defense articles and services. There has been far more than just a name change at OMC though; in 1990, the office will add at least 23 new, full-time people and undertake numerous initiatives to improve licensing services for industry.

William B. Robinson is the Director of DTC. After 15 years of heading OMC, Robinson is now able to match the growth in defense trade workload with growth in office resources. Prior to heading OMC, Robinson served for 5 years as Deputy Under Secretary of the Air Force for International Affairs, where he completed a 27-year career in the U.S. Air Force.

Michael T. Dixon is one of Robinson's two new Deputies. Dixon came to this job from PM's Office of International Security Policy, where he was Deputy Office Director for the past 5 years. A former Foreign Service Officer, Dixon has served in several U.S. embassies and State offices. His Foreign Service specialty is in East-West political economy and Latin American issues.

Richard A. Levy is the other Deputy Director of DTC. Prior to this job, Levy served as Assistant Secretary Clarke's Special Assistant for Regional Security where he focused primarily

on defense trade issues and the creation of the Center. Before coming to PM, Levy served in State's Bureau of Intelligence and Research as an analyst on Afghanistan and Iran. On detail from State, Levy has also served in the U.S. House of Representatives and on the National Security Council Staff.

Rose Marie H. Biancaniello is the Arms Licensing Division Chief in DTC, a job she has held for the past year. Prior to this job, Biancaniello was the Chief of the Aerospace and Ordnance Branch in the Arms Licensing Division. Since joining the government, Biancaniello has been at OMC, on and off, for more than 18 years.

Clyde G. Bryant, Jr. is the Compliance Analysis Division Chief, handling the compliance aspects of the International Traffic in Arms Regulations (ITAR). Bryant came to State in 1958, and has been at OMC 23 years. He has been involved with the compliance aspects of the ITAR since 1970, first as the Intelligence Assistant and later as the Support Services Division Chief.

The Office of Defense Trade Policy (PM/DTP) is largely a new office, drawing partially on the former Office of Strategic Technology Affairs (STA). Although the work of the Policy Office overlaps that of the Controls Office, DTP focuses primarily on setting policy guidelines for

commercial defense trade, whereas DTC concentrates on the actual implementation of the ITAR, i.e., licensing and enforcement. In addition to providing policy guidelines, DTP will also undertake various efforts to further assist industry.

Robert S. Pace is the Director of the Policy Office. Pace comes to this position with 2 years experience in PM as the Deputy Director of the Office of Security Assistance and Sales. Pace's other Foreign Service tours include service, largely on politico-military issues, in Turkey, Bolivia, Viet Nam, and Spain. (Former DTP Office Director Kevin L. Kearns has left the State Department to work at the Economic Strategies Institute.)

W. Scott Miller, III is the Deputy Director of DTP. Miller comes to State from Science Applications International Corporation (SAIC), where he worked since 1987 as an analyst on Defense Acquisition issues. From 1985 to 1987, Miller worked in the Arms Control and Disarmament Agency as Special Assistant to the Director.

Again, all of us in the management team at the new Center for Defense Trade are eager to serve U.S. defense industry and the general public. We look forward to working with you as we fix the problems that have led in recent years to much frustration with OMC.

Defense Trade Priority At State

New Leadership Addressed Problems Early On

Background on the reorganization. The idea of reorganizing the Department's handling of commercial defense trade emerged early in discussions among the new leadership at State. Aware of Congressional and industry concerns over the execution of State's responsibilities in this area, the new Department leadership held a series of meetings, chaired by Deputy Secre-

tary of State Eagleburger, last summer to examine the defense trade function.

After reviewing the various aspects of this function, the new leadership in the Department concluded the following. First, defense trade remains primarily a foreign policy/national security function, and thus must continue to be

under the control of the Secretary of State. But second, there is a real need to improve--within the bounds imposed for sound foreign policy and national security reasons--the ability of our defense industry to compete overseas.

Removing unnecessary impediments to defense trade. It was thus concluded that defense trade must be regulated by foreign policy decision makers in such a manner so as to avoid unnecessarily impeding trade.

Specifically, the new team decided that Congressional and industry complaints about the understaffing and underfunding of OMC were entirely legitimate. Furthermore, it was agreed that the amount of licensing demanded by the current system exceeded legitimate compliance needs. It was also evident that--given the growing competitiveness of the global arms market and political changes around the world--the Department needed to be more active on policy issues related to defense trade.

Clarke forthright in confirmation hearings. In his confirmation hearings, Clarke presented the view of the new leadership at the Department in response to a question about problems at OMC, saying:

"The Department of State has consistently underfunded the Office of Munitions Control. That office has two ex-

tremely important functions. First, it should support U.S. defense trade by making timely and prudent decisions on munitions export license applications. Second, it should protect U.S. defense-related technology and weapons from falling into the wrong hands by ensuring that the export of such items is limited only to reliable end-users. In carrying out both functions, OMC is a vital instrument of foreign policy that can be highly responsive and sometimes subtle.

I have discussed OMC with the highest levels of the Department on a number of occasions recently. I have been given the full support of the Department as a matter of highest priority to improve the support given to OMC. I am assured that additional personnel and funds will be made available as required to bring OMC up to a level of support such that it can carry out its important missions effectively. At the same time, we will be reducing workload...."

The bottom line: reorganization, resources, work reduction. The agreed-upon course of action was to reorganize the defense trade function and inject substantial new resources while undertaking a thorough workload reduction initiative. Thus was the Center for Defense Trade created.

Controls Office Expanding

Faster, More Responsive Licensing The Goal

70% growth at the Controls Office. With the backing of the State Department leadership, the new Center for Defense Trade received a commitment of significant new resources at a time of major budget cutbacks. The lion's share of these new resources is going to the Controls Office.

To enable the Controls Office to better facilitate defense trade while enforcing the necessary, strict export controls imposed by the U.S. Munitions List (USML), the Department allocated an additional \$1.5M in FY90 to DTC. DTC will also add a minimum of 23 new, full-time employees in 1990--expanding the office by 70%--with further growth planned in FY91.

Twelve new, permanent employees at DTC already. Of the 23 new, full-time people coming to DTC in 1990, 12 had already started work when we went to press in mid-March (not including the addition of Dueller, Frazier and Miller outside of DTC). This includes 7 licensing officers, 2 secretaries, 2 data entry/typist contractors, and 1 Deputy Office Director.

By the end of March, 2 more licensing officers will have begun work at DTC. The Controls Office will also have begun interviewing candidates for 6 more licensing officer positions, to be followed shortly by interviews for more clerical support.

This represents only the permanent growth in DTC that has taken place so far in 1990. On a temporary basis, DTC has also added 13 other people: 4 detailees from elsewhere in PM, 4 retired foreign service officers, 2 file clerk contrac-

tors, 1 administrative assistant, 1 computer specialist, and 1 management assistant. (These temporary people are being gradually dismissed as new permanent employees arrive.)

Ultimate aim: faster, more responsive licensing. The ultimate aim of this expansion at DTC is to provide U.S. defense industry with a more efficient, responsive, and predictable licensing process at the Department of State. We simply want to get license applications and other submissions that are sent to the Office of Defense Trade Controls reviewed, decided upon, and mailed back out as quickly as possible.

We also aim to respond to public inquiries in a timely manner. Although we believe we have made progress in this regard, we are aware that there continue to be difficulties contacting our staff by phone. We are working on improving this both internally and with AT&T.

Project Accelerate A Success

11,000 + Licenses Issued in Seven Weeks

Project Accelerate. Aiming to improve State's licensing services--and to do so quickly--the Office of Defense Trade Controls immediately began Project Accelerate. The Project's near-term aim was to eliminate the backlog that accumulated in OMC in December and early January due to the combination of the holidays, the move from the eighth to the second floor of State Annex 6, and the temporary shutdown of the computer system. The long-term aim was to begin institutionalizing a faster licensing process.

To achieve the near-term aim quickly, the Controls Office began working from 8 a.m. to 9 p.m. weekdays and 6 a.m. to 2 p.m. Saturdays. In addition, many new personnel were added to DTC, namely, the 13 temporary and 12 permanent new employees mentioned above. And in the evenings and on Saturdays, 5-10 overtime

employees from elsewhere in the Department helped out the DTC staff.

64% more licenses issued weekly than ever before. By March 5, Project Accelerate had achieved the near-term objective of eliminating the December backlog while also handling the continuous flow of incoming license applications. Specifically, in the seven weeks from January 16 to March 5, DTC issued 11,675 licenses. This represents a rate of issuance 64% greater than the average in 1988-1989.

<u>Average Licensing Rate</u> (Licenses/Week)	
<u>1988-1989</u>	<u>1990 (To Date)</u>
1,020	1,668

Our continuing, weekly challenge: to get more out than in. We recognize that, to date, Project Accelerate represents only a near-term success, and are working to institutionalize this "surge" progress. The challenge we are taking head-on is to continue mailing out more licenses each week than we receive, thereby steadily decreasing licensing time.

As part of the effort to institutionalize Project Accelerate, we are continuing overtime hours and maintaining a cadre of temporary employees to work alongside the growing numbers of new, permanent, full-time personnel.

WORKLOAD REDUCTIONS UNDERWAY

DSP-61s For Repairs & Warranty Exchanges Being Eliminated

A package of ideas. Our effort to improve licensing efficiency, primarily through resource expansion, is coupled with an effort to reduce the licensing workload--for you and for us.

The Center has already identified a number of areas where licensing could be simplified, if not eliminated altogether, without weakening our ability to enforce the necessary export controls. Such ideas include exporter distribution licenses and elimination of temporary licenses for static hardware display. Furthermore, the Center hopes to encourage industry to make greater use of the Commodity Jurisdiction (CJ) procedure as a means of reducing licensing workload.

We are in the midst of discussing our workload reduction ideas with the appropriate federal agencies, such as Defense and Customs, and are optimistic that many of these ideas will be agreed-upon and implemented.

Many DSP-61s soon to be eliminated. Already the Center has secured interagency agreement to eliminate the need for DSP-61 temporary import licenses for repairs and warranty exchanges (on a one-to-one basis). Once announced formally in the Federal Register sometime in the next several weeks, this change will eliminate the need for several thousand license applications each year, facilitating U.S. defense industry's supplier relationship with overseas purchasers. (The extension of license validity from two to three years, published in the Federal Register October 17, also eliminated some 3000-4000 renewal licenses each year.)

Center Offering New Services

EC92, CJ Hot Lines Effective Immediately

This month, the Center for Defense Trade will start offering two new services to industry: an EC92 point of contact and a Commodity Jurisdiction licensing officer team.

EC92 point of contact. In an interview published in the Society for International Affairs *Newsnotes*, January 1990, Assistant Secretary Clarke responded to a question about the impact of EC92, saying:

"Defense industry in general is going to be affected by EC92 and probably affected negatively if it doesn't develop strategies for dealing with a unified Europe. Those strategies have to involve co-production and co-development arrangements with European companies. We are prepared to look at innovative arrangements to help them.

The traditional argument has been that the Europeans will not do co-production or co-development with us because of the long arm of licensing. We are going to continue to have a long arm on licensing. It is up to industry to come up with some new proposals and I've invited that several times and I haven't heard anything, but we are perfectly willing, in fact, eager, to look at industry proposals."

In an effort to facilitate a dialogue with industry, the Office of Defense Trade Policy has designated Deputy Director Scott Miller as the Center's point of contact on EC92-related issues. Miller can be reached at (202) 647-4231.

Commodity Jurisdiction licensing team. In a joint subcommittee hearing before the House Foreign Affairs Committee February 8, Center Director Duelfer summarized the Center's view

on the Commodity Jurisdiction (CJ) procedure. He stated:

"I want a smooth CJ process for two reasons. First, the more CJs we do, the more items we can remove from the USML, thus reducing our workload. Second, and most importantly, the more CJs industry requests (or anyone else, for that matter), the more items that will be removed from the USML, thus the fewer items that will need to be subject to the strict USML export regulations.

The bottom line is that we recognize it is a matter of vital national interest for American business to be able to operate as freely as possible in today's competitive international environment. Although the USML's strict export controls still remain absolutely necessary for foreign policy/national security reasons, we do not want to impose them on any more commodities than necessary.

I would like to reiterate that I welcome more CJ requests and point out that any U.S. citizen, company, or government agency can submit a CJ request to the Office of Defense Trade Controls. I will be watching this process personally with my colleagues at Commerce and Defense. I cannot promise instant decisions on every case, since the significance of each CJ determination merits careful analysis and discussion. However, I will promise that as cases arrive, they will get quick attention and that any disagreements will be addressed in a timely fashion at the appropriate levels."

In an effort to keep this promise, DTC has designated two new licensing officers as the Commodity Jurisdiction licensing team. Michael VanAtta and Gary Oncale can be reached

at (703) 875-6644 to answer inquiries about CJ procedures (see next article). They will also be handling all CJ cases for DTC.

CJ Procedure Clarified

The Commodity Jurisdiction (CJ) procedure is the mechanism for determining if a commodity, for export control purposes, is a munitions item, and thus is covered by the USML. It is discussed in ITAR Section 120.5.

As Center Director Duelfer pointed out in his Congressional hearing (see previous article), the Center is eager to receive more CJ requests and thereby remove more commodities, as appropriate, from the strict export controls imposed by the USML. To encourage the submission of more CJ requests and expedite the handling of such requests, DTC has designated two licensing officers full-time as the CJ licensing team.

The following description of the CJ procedure is provided to clarify how this procedure works.

Submission

Step 1. A U.S. citizen, company or government agency submits a letter to DTC requesting a CJ determination of a specific good or service. Such a submission often includes arguments as to why the item under consideration should not be designated a munitions item and therefore should not be covered by the USML.

A submission is made for one of two reasons. First, the submitter is unsure whether the item or service is considered a munitions item by DTC for export control purposes and therefore covered by the USML. Second, the submitter believes a good argument can be made that an item or service that is currently considered a munitions item should no longer be designated as such.

Any U.S. citizen, company, or government agency may submit a CJ case; the individual or company does not need to be registered with DTC. Furthermore, a CJ request does not in any way affect DTC's review of export license applications for that item during the CJ process.

Determination

Step 2. Upon receipt, a CJ request is logged into DTC's database and assigned a chronological CJ number. A CJ licensing officer then reviews the request and refers a copy of the entire request to Commerce and to the government agency with relevant technical expertise on the item under consideration.

Specifically, DTC refers all new CJ requests to the Department of Commerce. The Department of Defense is the appropriate technical agency in the CJ referral process about 95% of the time. A small percentage of CJ requests are, however, referred to other agencies, such as NASA and the Department of Energy.

Step 3. After evaluation of the CJ case, Commerce, Defense, and the other technical referral agencies each provide DTC with their recommendation as to whether the item under consideration should or should not be considered a munitions item. DTC tracks referred CJ requests and makes periodic calls to referral agencies that are slow in responding to a case.

In 1988-1989, Defense recommended 63% of the time that the item under consideration be designated a non-munitions item. In this same period, Commerce recommended removal from the USML's coverage more than 90% of the time.

Step 4. Upon receipt of the referral agencies' recommendations, DTC weighs the various analyses and in those cases where the various agencies' recommendations differ, DTC makes a tentative determination. DTC then notifies the referral agency whose recommendation differs from DTC's tentative determination of the tentative determination. If it chooses, this agency can then send DTC further argumentation.

Step 5. Taking into consideration the referral agencies' inputs, DTC makes its final determination and notifies the referral agencies and the submitter of the determination. Internally, DTC's final determination is made jointly by the heads of both the licensing division (Biancaniello) and the compliance division (Bryant).

In the 440 CJ determinations made in 1988 and 1989, DTC determined 70% of the time that the item under consideration was a non-munitions item and thus not covered by the USML.

Appeal

Step 6. In June 1989, two appeal steps were added at the Department of State by Under Secretary for Security Assistance, Science, and Technology Reginald Bartholomew. In the first step, if the U.S. citizen, company, or govern-

ment agency that submitted the CJ request is not satisfied with DTC's determination, then they may appeal the determination to Center Director Duelfer. Any such appeal, however, should be made within ten days.

Upon receipt of an appeal, Duelfer will ordinarily convene an interagency meeting with representation by all of the involved referral agencies. Based on that meeting, he will notify all concerned parties of his determination. This process should be completed within thirty days of receipt of the appeal.

Step 7. If that determination is also found to be unsatisfactory, or if no decision is reached in the first appeal in 30 days, appeal can be made directly to Under Secretary Bartholomew. Such appeal, however, should be made within ten days. The Under Secretary's determination will be based, as appropriate, on consultations with concerned parties, and notification of his determination should occur within thirty days of the appeal.

Step 8. Cabinet officers can appeal a State Department CJ determination to the President and the National Security Council Staff, who then review the case and either uphold or overturn State's determination.

Personnel Updates

The new personnel in the Center for Defense Trade each bring with them unique experiences and backgrounds, strengthening the Center's diversity and depth of knowledge. To familiarize you with the staff, we will include brief profiles on Center personnel in each newsletter. For this newsletter, we have selected to profile three military licensing officers, one civilian licensing officer, and two secretaries.

LCDR William R. Massie reported to DTC January 20 as the first of six military officers detailed to the Center. He recently completed

a tour as the Operations and Executive Officer on the USS Hewitt, a strike destroyer based out of San Diego. LCDR Massie's varied background includes tours onboard USS Long Beach (CCN-9), USS Ellusive (MSO-448), USS Peoria (LST-1183), and USS Thomaston (LSD-28). He possesses hands-on expertise in naval communications and operations, engineering, Anti-Submarine Warfare (ASW), and mine warfare. Massie is a 1979 graduate of the U.S. Naval Academy. He is currently working primarily on National Disclosure Policy issues.

MAJ Martin Maier joined the Center February 13, reporting from Andrews Air Force Base where he served since May 1986 as a Test Range Resource Manager for the Air Force Systems Command. Assignments in his 13-year military career have included Chief of the Guided Weapons Test Branch at Eglin AFB, and Range Development Manager for the Utah Test and Training Range while assigned to Edwards AFB. Maier brings diverse developmental and operational testing expertise to the Center, with experience in aircraft and armament systems incorporating "leading edge" technologies. Maier is a 1977 graduate of the Air Force Academy. As a Licensing Officer, he reviews Technical Assistance Agreements (TAAs), Manufacturing License Agreements (MLAs), and cases involving the DoD Brilliant Pebbles program.

MAJ Gary Oncale also joined the Center February 13, reporting from previous duty at Headquarters, Air Force Systems Command, Andrews AFB. There, Oncale worked as the Advanced Tactical Weapons Program Manager in the Requirements Directorate, attaining extensive knowledge of advanced weapons developmental programs. Oncale's previous tours include Eglin AFB, Incirlik CDI, Turkey, and Malstrom AFB. Oncale's 16 years service has equipped him with specialized knowledge in Air Force weapons programs. Oncale is currently assigned as a Commodity Jurisdiction Licensing Officer.

Daniel Cook came to DTC January 14, after serving at the Department of Commerce's Bureau of Export Administration for 4 years. At Commerce, Dan was an Export Administration Specialist in the Computer Systems Branch, handling computers and specialized telecommunications equipment for export to both "free-world" and proscribed countries. Cook is a 1986 cum laude graduate of Liberty University. He currently works as a Licensing Officer handling firearms and encryption equipment.

Nadia Brown joined the Center February 26, coming from PM's Office of International Security Policy. She has been with the Department for 4 years, having worked in both PM and the Latin America Bureau. At the Center, Brown serves as a secretary in the Compliance Analysis Division.

Joyce Diggs joined the Center March 12, coming from the Department's Foreign Service Institute (FSI). Diggs had been employed as a secretary at FSI for the past 3 years before coming to DTC. She now works as a secretary for the Electronics and Combat Systems Branch in DTC's Arms Licensing Division.

Other new personnel who have started work at the Center in the past two months and will be profiled in future newsletters are licensing officers Marsha Filtrante, Terry Davis, and Michael Van Atta and data entry/typist contractors Trena Blake and Mezzanyne Greene.

Registration Notice

Who needs to register? In accordance with U.S. law (22 USC Sec. 2778(b)(1)) and regulation (22 CFR Sec. 122.1), every business entity or individual person who engages in the United States in the business of:

1. manufacturing defense articles, which includes components, parts, accessories and attachments, and modifications thereto;
2. exporting defense articles, which includes components, parts, accessories and attachments; or,
3. furnishing defense services to foreign persons in the U.S. or abroad;

is required to register with DTC. Manufacturers who do not engage in exporting must nevertheless register. Exceptions to the registration requirement are set forth in 22 CFR Sec. 122.1 (b), which is included in the registration packet available from DTC. (A "defense article or service" is any commodity or function whose purpose is inherently military or which has been modified for military purposes, regardless of end-use.)

Purpose of registration. While registration does not confer any export rights or privileges, it is generally a precondition to the issuance of an export license. An export license may not be issued until the registration process is completed. Failure to register or qualify for an exemption from registration may result in a processing delay or in your request for an export license being returned without action.

To obtain registration information and materials. Registration information may be requested by mail, express mail or fax from DTC. Please include a complete return address with any request for information and forms, and mark your request "Attention: Registration."

Registration expiration. If you have already registered, please check the first four digits of your applicant code number to ascertain the month and year that your registration expires. Your registration expires on the last day of the month indicated. Registrants should apply for renewal at least a month in advance of the expiration date.

Tips And Tidbits

Japanese F-16 and F-15 Wright Patterson Program. Applications for export of articles and technical data for these programs may no longer be submitted to Wright Patterson Air Force Base (WPAFB) before coming to DTC. WPAFB will continue to work the cases in their system, but has begun to return to the applicant any new cases for submission directly to DTC.

Policy concerning company acquisitions. If a company has merged with another company or a company was involved in an acquisition involving whole companies, subsidiaries, divisions of companies, etc, the procedure for dealing with licenses granted to the previous company is to have the new company apply for a license under its name for the unshipped balance. The procedure for agreements is to have the new company send in an administrative amendment to the agreement signed by the new company, the previous company, and the foreign company, setting forth the change that has taken place.

Attachment of previous licenses. If, on a license application, the applicant cites a previous license which might serve as a precedent for the current application or for which the current application is an "unshipped balance," the applicant should attach a copy of the previous license, including any proviso letter. This will facilitate licensing and prevent unnecessary staffing.

Reminders on end-users and Part 126.13 statement. Please remember that the applicant is responsible for determining the end-user before applying for an export license. See 18A of the instructions on the DSP-5. Likewise, please remember to attach your ITAR Part 126.13 Certification Letter to all submissions to DTC, with an original signature--no copies and no Faxes please. The original and two copies of the freight forwarder addendum, as appropriate, are sufficient; seven copies are not necessary.

To Contact The Center for Defense Trade:

Postal Service Mailing Addresses:

PM/DTC SA-6 Room 228
Office of Defense Trade Controls
Bureau of Politico-Military Affairs
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520-0602

PM/DTP Room 7815
Office of Defense Trade Policy
Bureau of Politico-Military Affairs
U.S. Department of State
2201 C Street, N.W.
Washington, D.C. 20520

Express Mail/Courier Service Delivery Address:

PM/DTC Room 228
Office of Defense Trade Controls
Bureau of Politico-Military Affairs
U.S. Department of State
1701 N. Fort Myer Drive
Arlington, VA 22209

Telephone Numbers:

PM/DTC
General Information: (703) 875-6644
License Status Inquiry: (703) 875-6652
Commodity Jurisdiction Licensing
Team: (703) 875-6644
Registration/Compliance Information:
(703) 875-6650

PM/DTP: (202) 647-4231

Fascimile Numbers:

PM/DTC Licensing: (703) 875-6647
Compliance: (703) 875-5663
PM/DTP (202) 647-1346

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