



August 26, 2019

Office of Defense Trade Controls Policy
U.S. Department of State
Washington, D.C.

Via email: DDTCTPublicComments@state.gov

RE: RIN 1400-AE29 – *Consolidation of Exemptions in the International Traffic in Arms Regulations*

Dear Assistant Secretary Cooper:

The Association of University Export Control Officers (AUECO) respectfully submits this letter in response to the call for comments on the U.S. Department of State, Directorate of Defense Trade Controls (DDTC), Proposed Rule, Consolidation of Exemptions in the International Traffic in Arms Regulations (ITAR), 84 FR 36040 (07/26/2019).

AUECO is an association of over 290 export control professionals with compliance responsibilities at over 180 institutions of higher education within the United States. AUECO is committed to monitoring changes in the administration of export control laws and regulations that may affect unique nature of higher education and academia, including academic and research collaborations.

With over 50 Exemptions in the ITAR, and the word “exemption” not appearing within the ITAR except for Supplement No. 1 to Part 126, consolidation of available exemptions in the ITAR would be very useful to both the academic and industry communities. Organizations such as the Society for International Affairs (SIA) have published informal industry reference documents of the ITAR Exemptions to serve as a guide (<https://www.siaed.org/Sys/Store/Products/17932>). While some find these documents helpful, they are only current to the time of publication (currently May 2018). A consolidated list within the ITAR would remove the need for such informal reference documents.

We would propose DDTC utilize a similar concept like that used by the Bureau of Industry and Security (BIS) at 15 CFR Part 740, which would provide exporters with a clear place to find exemptions in the ITAR. This would also reduce unnecessary license applications if exporters could easily search and review exemptions in a single location.

We anticipate the review of the overlapping and consolidation of the exemptions will be a significant undertaking. The Department of State may wish to consider tasking the Defense Trade Advisory Group (DTAG) with drafting recommendations for modifications in their advisory capacity.

AUECO appreciates the opportunity to provide the Department of State with the above comments on the Consolidation of Exemptions in the ITAR and will be glad to provide further comments if it would be helpful

Respectfully,

Mary Millsaps

Chair
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