

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
Carrier Access Corporation)
5395 Pearl Parkway)
Boulder, Colorado 80301)
)
Respondent.)
_____)

ORDER RELATING TO CARRIER ACCESS CORPORATION

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) has notified Carrier Access Corporation (“Carrier”) of its intention to initiate an administrative proceeding against Carrier pursuant to Section 766.3 of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) (“Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (“Act”),² by issuing a proposed charging letter to Carrier, alleged that Carrier committed 16 violations of the Regulations. Specifically, the charges are:

¹ The charged violations occurred in 2001 and 2002. The Regulations governing the violations at issue are found in the 2001 and 2002 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2001 – 2002)). The 2005 Regulations set forth the procedures that apply to this matter.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) (“IEEPA”). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 2, 2005, (70 Fed. Reg. 45273 (August 5, 2005)), has continued the Regulations in effect under IEEPA.

1. *Two Violations of 15 C.F.R. § 764.2(a): Exporting Items Without Required Licenses:* On two occasions on or about December 17, 2001, and on or about March 7, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting telecommunications devices including the Adit 600 Chassis, FXO Channel Cards, and ABI FXO Ports, items subject to both the Regulations (ECCN 5A991) and the Iranian Transactions Regulations of the Treasury Department's Office of Foreign Assets Control,³ through the United Arab Emirates to Iran without authorization from OFAC as required by Section 746.7 of the regulations.
2. *Two Violations of 15 C.F.R. § 764.2(e): Acting With Knowledge That a Violation of the Regulations Was About to Occur:* On or about December 17, 2001 and on or about March 7, 2002, in connection with the transactions referenced above, Carrier sold items exported from the United States with knowledge that a violation of the Regulations would occur. Specifically, Carrier sold the telecommunications devices described above to a Canadian company, when Carrier knew or had reason to know that these devices would be exported from the United States to Iran, via the United Arab Emirates, without the required U.S. Government authorization. Carrier had reason to know that these devices were destined for Iran after Carrier was advised by Carrier technicians in November 2001 that Carrier and the Canadian company were servicing Carrier devices located in Iran and that the Canadian company wished to purchase additional devices from Carrier for export to Iran. Carrier had reason to know that a license was required for these exports since Carrier shipping personnel were aware of the

³ See 31. C.F.R § 560.204 (2005).

Regulations and reviewed the Regulations prior to exporting the devices described above.

3. *Two Violations of 15 C.F.R. § 764.2(a): Failure to File Shipper's Export*

Declarations: On two occasions on or about December 17, 2001, and on or about March 7, 2002, in connection with the transactions referenced above, Carrier refrained from engaging in conduct required by Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Pursuant to Section 758.1(b) of the Regulations, an SED must be filed with the U.S. Government for an export to Iran of any item subject to the Regulations. The telecommunications devices were items subject to the Regulations.

4. *Seven Violations of 15 C.F.R. § 764.2(a): Exporting Technical Information*

Without the Required Licenses: On seven occasions between on or about May 9, 2001, and on or about March 19, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting technical information subject to the Regulations (ECCN 5E991) to Iran without the required authorization. Specifically, Carrier transmitted technical data to callers from Iran, and callers assisting Iranian customers, via telephone, e-mail and telnet access, without the required U.S. Government authorization.

5. *Three Violations of 15 C.F.R. § 764.2(e): Acting With Knowledge That a*

Violation of the Regulations Had Occurred or Was About to Occur: On or about January 7, 2002, on or about March 8, 2002, and on or about March 19, 2002, in connection with the transactions referenced above, Carrier serviced items that had been exported from the United States with knowledge that violations of the

Regulations would occur or had occurred. Specifically, Carrier serviced Carrier telecommunications devices, including the Adit 600 Chassis, FXO Channel Cards, ABI FXO Ports, items subject to the Regulations, when Carrier knew or had reason to know that it was exporting or transmitting technical information from the United States to Iran without the required U.S. Government authorization. Carrier had reason to know that violations of the Regulations would occur or had occurred after Carrier employees were notified by Carrier technicians in November 2001, that Carrier technicians had been providing customer service to Iranian end-users or assisting customers with Carrier devices located in Iran. Carrier had reason to know that a license was required for these exports since Carrier employees were aware of the Regulations, and had also been alerted to the previous violations described above.

WHEREAS, BIS and Carrier have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, that a civil penalty of \$61,600 is assessed against Carrier, which shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order. Payment shall be made in the manner specified in the attached instructions.

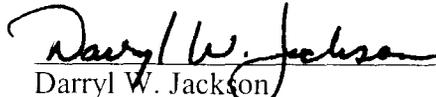
SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and, if payment is not made by the due date specified herein,

Carrier will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to Carrier. Accordingly, if Carrier should fail to pay the civil penalty in a timely manner, the undersigned may enter an Order denying all of Carrier's export privileges under the Regulation for a period of one year from the date of entry of this Order.

FOURTH, that the proposed charging letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.


Darryl W. Jackson
Assistant Secretary of
Commerce for Export Enforcement

Entered this 22nd day of November 2005.

UNITED STATES DEPARTMENT OF COMMERCE
BUREAU OF INDUSTRY AND SECURITY
WASHINGTON, D.C. 20230

In the Matter of:)
)
Carrier Access Corporation)
5395 Pearl Parkway)
Boulder, Colorado 80301)
)
Respondent.)
)

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between Respondent, Carrier Access Corporation (“Carrier”), and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively referred to as “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2005)) (“Regulations”),¹ issued pursuant to the Export Administration Act of 1979, as amended (50 U.S.C. app. §§ 2401-2420 (2000)) (“Act”),²

¹ The charged violations occurred in 2001 and 2002. The Regulations governing the violations at issue are found in the 2001 and 2002 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2001 – 2002)). The 2005 Regulations set forth the procedures that apply to this matter.

² From August 21, 1994 through November 12, 2000, the Act was in lapse. During that period, the President, through Executive Order 12924, which had been extended by successive Presidential Notices, the last of which was August 3, 2000 (3 C.F.R., 2000 Comp. 397 (2001)), continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 - 1706 (2000)) (“IEEPA”). On November 13, 2000, the Act was reauthorized and it remained in effect through August 20, 2001. Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), as extended by the Notice of August 2, 2005, (70 Fed. Reg. 45273 (August 5, 2005)), has continued the Regulations in effect under IEEPA.

WHEREAS, Carrier filed a voluntary self-disclosure with BIS's Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein;

WHEREAS, BIS has notified Carrier of its intention to initiate an administrative proceeding against Carrier, pursuant to the Act and the Regulations;

WHEREAS, BIS has issued a proposed charging letter to Carrier that alleged that Carrier committed 16 violations of the Regulations, specifically:

1. *Two Violations of 15 C.F.R. § 764.2(a): Exporting Items Without Required Licenses:* On two occasions on or about December 17, 2001, and on or about March 7, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting telecommunications devices including the Adit 600 Chassis, FXO Channel Cards, and ABI FXO Ports, items subject to both the Regulations (ECCN 5A991) and the Iranian Transactions Regulations of the Treasury Department's Office of Foreign Assets Control,³ through the United Arab Emirates to Iran without authorization from OFAC as required by Section 746.7 of the regulations.
2. *Two Violations of 15 C.F.R. § 764.2(e): Acting With Knowledge That a Violation of the Regulations Was About to Occur:* On or about December 17, 2001 and on or about March 7, 2002, in connection with the transactions referenced above, Carrier sold items exported from the United States with knowledge that a

³ See 31. C.F.R § 560.204 (2005).

violation of the Regulations would occur. Specifically, Carrier sold the telecommunications devices described above to a Canadian company, when Carrier knew or had reason to know that these devices would be exported from the United States to Iran, via the United Arab Emirates, without the required U.S. Government authorization. Carrier had reason to know that these devices were destined for Iran after Carrier was advised by Carrier technicians in November 2001 that Carrier and the Canadian company were servicing Carrier devices located in Iran and that the Canadian company wished to purchase additional devices from Carrier for export to Iran. Carrier had reason to know that a license was required for these exports since Carrier shipping personnel were aware of the Regulations and reviewed the Regulations prior to exporting the devices describe above.

3. *Two Violations of 15 C.F.R. § 764.2(a): Failure to File Shipper's Export Declarations:* On two occasions on or about December 17, 2001, and on or about March 7, 2002, in connection with the transactions referenced above, Carrier refrained from engaging in conduct required by Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Pursuant to Section 758.1(b) of the Regulations, an SED must be filed with the U.S. Government for an export to Iran of any item subject to the Regulations. The telecommunications devices were items subject to the Regulations.

4. *Seven Violations of 15 C.F.R. § 764.2(a): Exporting Technical Information Without the Required Licenses:* On seven occasions between on or about May 9, 2001, and on or about March 19, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting technical information subject to the Regulations (ECCN 5E991) to Iran without the required authorization. Specifically, Carrier transmitted technical data to callers from Iran, and callers assisting Iranian customers, via telephone, e-mail and telnet access, without the required U.S. Government authorization.
5. *Three Violations of 15 C.F.R. § 764.2(e): Acting With Knowledge That a Violation of the Regulations Had Occurred or Was About to Occur:* On or about January 7, 2002, on or about March 8, 2002, and on or about March 19, 2002, in connection with the transactions referenced above, Carrier serviced items that had been exported from the United States with knowledge that violations of the Regulations would occur or had occurred. Specifically, Carrier serviced Carrier telecommunications devices, including the Adit 600 Chassis, FXO Channel Cards, ABI FXO Ports, items subject to the Regulations, when Carrier knew or had reason to know that it was exporting or transmitting technical information from the United States to Iran without the required U.S. Government authorization. Carrier had reason to know that violations of the Regulations would occur or had occurred after Carrier employees were notified by Carrier technicians in November 2001, that Carrier technicians had been providing

customer service to Iranian end-users or assisting customers with Carrier devices located in Iran. Carrier had reason to know that a license was required for these exports since Carrier employees were aware of the Regulations, and had also been alerted to the previous violations described above.

WHEREAS, Carrier has reviewed the proposed charging letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true;

WHEREAS, Carrier fully understands the terms of this Agreement and the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, Carrier enters into this Agreement voluntarily and with full knowledge of its rights;

WHEREAS, Carrier states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, Carrier neither admits nor denies the allegations contained in the proposed charging letter;

WHEREAS, Carrier wishes to settle and dispose of all matters alleged in the proposed charging letter by entering into this Agreement; and

WHEREAS, Carrier agrees to be bound by the Order, if entered;

NOW THEREFORE, the Parties hereby agree as follows:

1. BIS has jurisdiction over Carrier, under the Regulations, in connection with the matters alleged in the proposed charging letter.

2. The following sanction shall be imposed against Carrier in complete settlement of the violations of the Regulations relating to the transactions specifically detailed in the voluntary self-disclosure and the proposed charging letter:

- a. Carrier shall be assessed a civil penalty in the amount of \$61,600, which shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of the Order. Payment shall be made in the manner specified in the attached instructions.
- b. The timely payment of the civil penalty agreed to in paragraph 2.a. is hereby made a condition to the granting, restoration, or continuing validity of any export license, License Exception, permission, or privilege granted, or to be granted, to Carrier. Failure to make timely payment of the civil penalty set forth above may result in the denial of all of Carrier's export or reexport privileges under the Regulations for a period of one year from the date of imposition of the penalty.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, Carrier hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if entered), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if entered; (c) request any relief from the Order, if entered, including without limitation relief from the terms of a denial order under 15 C.F.R. § 764.3(a)(2); and (d) seek judicial review or otherwise contest the validity of this Agreement or the Order, if entered.

4. Upon entry of the Order and timely payment of the \$61,600 civil penalty, BIS will not initiate any further administrative proceeding against Carrier in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the voluntary self-disclosure and the proposed charging letter.

5. BIS will make the proposed charging letter, this Agreement, and the Order, if entered, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if entered, nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by entering the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

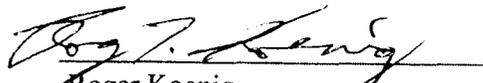
9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind his respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY,
U.S. DEPARTMENT OF COMMERCE

CARRIER ACCESS CORPORATION



Michael D. Turner
Director
Office of Export Enforcement



Roger Koenig
Chief Executive Officer
Carrier Access Corporation

Date: 11/19/05

Date: Nov. 10, 2005

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Carrier Access Corporation
5395 Pearl Parkway
Boulder, Colorado 80301

Attn: *Roger Koenig,*
Chief Executive Officer

Dear Mr. Koenig:

The Bureau of Industry and Security, U.S. Department of Commerce ("BIS"), has reason to believe that Carrier Access Corporation (hereafter "Carrier") of Boulder, Colorado, has committed sixteen violations of the Export Administration Regulations (the "Regulations"),¹ which are issued under the authority of the Export Administration Act of 1979 (the "Act").² Specifically, BIS charges that Carrier committed the following violations:

Charges 1 – 2 15 C.F.R. § 764.2(a): Exporting Items Without the Required Licenses:

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on two occasions on or about December 17, 2001, and on or about March 7, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting telecommunications devices, including the Adit 600 Chassis, FXO Channel Cards, and ABI FXO Ports, items subject to both the Regulations (ECCN 5A991) and the Iranian Transactions Regulations of the Treasury Department's Office of Foreign Assets Control,³ through the United Arab Emirates to Iran without authorization from OFAC as required by Section 746.7 of the Regulations. In so doing, Carrier committed two violations of Section 764.2(a) of the Regulations.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2005). The charged violations occurred in 2001 and 2002. The Regulations governing the violations at issue are found in the 2001 and 2002 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2001 – 2002)). The 2005 Regulations set forth the procedures that apply to this matter.

² 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 2, 2005 (70 Fed. Reg. 45,273 (August 5, 2005)), has continued the Regulations in effect under the IEEPA.

³ See 31 C.F.R. § 560.204.

Charges 3 – 4 15 C.F.R. § 764.2(e): Acting With Knowledge That a Violation of the Regulations Was About to Occur:

On or about December 17, 2001 and on or about March 7, 2002, in connection with the transactions referenced in Charges One and Two, Carrier sold items exported from the United States with knowledge that a violation of the Regulations would occur. Specifically, Carrier sold the telecommunications devices described above to a Canadian company, when Carrier knew or had reason to know that these devices would be exported from the United States to Iran, via the United Arab Emirates, without the required U.S. Government authorization. Carrier had reason to know that these devices were destined for Iran after Carrier was advised by Carrier technicians in November 2001 that Carrier and the Canadian company were servicing Carrier devices located in Iran and that the Canadian company wished to purchase additional devices from Carrier for export to Iran. Carrier had reason to know that a license was required for these exports since Carrier shipping personnel were aware of the Regulations and reviewed the Regulations prior to exporting the devices described above. In so doing, Carrier committed two violations of Section 764.2(e) of the Regulations.

Charges 5 – 6 15 C.F.R. § 764.2(a): Failure to File Shipper's Export Declarations

On two occasions on or about December 17, 2001, and on or about March 7, 2002, in connection with the transactions referenced in Charges One and Two, Carrier refrained from engaging in conduct required by Regulations when it failed to file Shipper's Export Declarations ("SEDs") with the U.S. Government. Pursuant to Section 758.1(b) of the Regulations, an SED must be filed with the U.S. Government for an export to Iran of any item subject to the Regulations. The telecommunications devices were items subject to the Regulations. In failing to file SEDs, Carrier committed two violations of Section 764.2(a) of the Regulations.

Charges 7 – 13 15 C.F.R. § 764.2(a): Exporting Technical Information Without the Required Licenses

As described in greater detail in Schedule A, which is enclosed herewith and incorporated herein by reference, on seven occasions between on or about May 9, 2001, and on or about March 19, 2002, Carrier engaged in conduct prohibited by the Regulations by exporting technical information subject to the Regulations (ECCN 5E991) to Iran without the required authorization. Specifically, Carrier transmitted technical data to callers from Iran, and callers assisting Iranian customers, via telephone, e-mail and telnet access, without the required U.S. Government authorization. In so doing, Carrier committed seven violations of Section 764.2(a) of the Regulations.

Charges 14 – 16 15 C.F.R. § 764.2(e): Acting With Knowledge That a Violation of the Regulations Had Occurred or Was About to Occur:

On or about January 7, 2002, on or about March 8, 2002, and on or about March 19, 2002, in connection with the transactions referenced in Charges Eleven through Thirteen, Carrier serviced items that had been exported from the United States with knowledge that violations of the Regulations would occur or had occurred. Specifically, Carrier serviced Carrier telecommunications devices, including the Adit 600 Chassis, FXO Channel Cards, ABI FXO Ports, items subject to the Regulations, when Carrier knew or had reason to know that it was exporting or transmitting technical information from the United States to Iran without the required U.S. Government authorization. Carrier had reason to know that violations of the Regulations would occur or had occurred after Carrier employees were notified by Carrier technicians in November 2001, that Carrier technicians had been providing customer service to Iranian end-users or assisting customers with Carrier devices located in Iran. Carrier had reason to know that a license was required for these exports since Carrier employees were aware of the Regulations, as described in Charges Four and Five, and had also been alerted to the previous violations described in Charges Two and Three above. In so doing, Carrier committed three violations of Section 764.2(e) of the Regulations.

* * * *

Accordingly, Carrier is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions, including any or all of the following:

- The maximum civil penalty allowed by law of \$11,000 per violation;⁴
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

If Carrier fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6 and 766.7. If Carrier defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to Carrier. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

Carrier is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. Carrier is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

⁴ 15 C.F.R. § 6.4(a)(4).

Carrier
Proposed Charging Letter
Page 4 of 5

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should Carrier have a proposal to settle this case, Carrier or its representative should transmit it to the attorney representing BIS named below.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, Carrier's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of Carrier's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: James C. Pelletier, Esq.
Room H-3839
United States Department of Commerce
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

James C. Pelletier is the attorney representing BIS in this case; any communications that Carrier may wish to have concerning this matter should occur through him. Mr. Pelletier may be contacted by telephone at (202) 482-5301.

Sincerely,

Michael D. Turner
Director
Office of Export Enforcement

SCHEDULE A

CARRIER ACCESS CORPORATION

CHARGES	DATE OF EXPORT (ON OR ABOUT)	COMMODITY	VALUE (U.S. DOLLARS)	ECCN	COUNTRY	SERVICE TICKET NO.	INVOICE/AIRWAYBILL
1. 3. 5	12/17/01	Adit 600 Chassis (2) Adit 600 FXO Cards (12)	\$7,491.82	5A991	Iran	--	29826/FedEx601 102116011
2. 4. 6	3/7/02	Adit 600 Chassis (4) FXO Cards (24) ABI w/24 FXO ports (4) Power Adapter (4) Cables (20)	\$23,288.64	5A991	Iran	--	31504/FedEx601 102120871
7	5/9/01	Customer Support	--	5E991	Iran	20207	--
8	7/25/01	Customer Support	--	5E991	Iran	24874	--
9	9/14/01	Customer Support	--	5E991	Iran	1-21827	--
10	11/08/01	Customer Support	--	5E991	Iran	1-25210	--
11, 14	1/7/02	Customer Support	--	5E991	Iran	1-28026	--
12, 15	3/8/02	Customer Support	--	5E991	Iran	1-31686	--
13, 16	3/19/02	Customer Support	--	5E991	Iran	1-32335	--