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Submitter Information

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General Comment

A. I support this. Many companies already print the ECCN on their commercial invoices so it shouldn't be a burden for the rest of the exporting community to do this as well. After all you have to determine the ECCN in order to export so why not document it to all in the supply chain (forwarders, brokers, foreign parties etc). It can only help.

B. I disagree that this is already standard with most exporters. Standard export invoices show the "bill to" party and the "ship to" party. Often the "ship to" party may be the ultimate user and therefore it's country be the "country of ultimate destination", but a fair amount of the time it is not. How would you propose reporting the "country of ultimate destination" in the case of exporting ("ship to") to a foreign distributor? There are many other scenarios where the "ship to" is not necessarily = to the country of ultimate destination. I feel this could be a trap for exporters if they become "required" to document/report this, with ensuing enforcement for mis-reporting. We also export containers of stuff to our foreign affiliates that they may then use to service customers in multiple countries. How would we report a country of ultimate destination? So if you proceed with this just please put better definition about what's to be reported - industry may be able to comply with some guidelines.

C. I support this - exporters are responsible for determining this, so asking them to DOCUMENT it should not be a burden, and will also benefit others in the supply chaing (forwarders, foreign recipients etc).