NORTHROP GRUMMAN

Northrop Grumman Corporation
Corporate Office

Global Trade Management
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Regulatory Policy Division
Bureau of Industry and Security
Department of Commerce
Room 2099B
14th Street and Pennsylvania Ave, NW
Washington, D.C. 20230

ATTN:
Bureau of Industry and Security

SUBJECT: RIN 0694-AF52

To whom it may concern

Northrop Grumman Corporation (NGC) wishes to thank the Department for the opportunity to submit comments in review of RIN 0694-AF52 (Commerce Control List: Addition of Items Determined to No Longer Warrant Control Under United States Munitions List Category XIV (Toxicological Agents) or Category XVIII (Directed Energy Weapons)). In response, NGC provides the following recommendations:

ECCN 1A607:

As noted in, and to be consistent with NGC's comments to the Department of State, recommend the protective items currently listed in Category XIV(f)(4) be moved to the CCL under 1A607. This proposed ECCN provides more than adequate levels of control and such classification would better enable exports to our allies as well as support individuals deploying in support of USG Operations.

BAG Exception: NGC also recommends adding special provisional language to § 740.14 BAGGAGE (similar to that of § 740.14 (h) Special provisions: personal protective equipment classified under ECCN 1A613.c or .d) to allow for the use of this exception for items controlled by 1A607.

Should clarification or subsequent technical discussions be necessary, please contact either Steve Headley at james.headley@ngc.com, (703 280-4806), or myself at thomas.p.donovan@ngc.com (703-280-4045).

Sincerely,

Thomas P. Donovan
Director, Export Management
Global Trade Management