MERIDIAN
MEDICAL TECHNOLOGIES™
A Pfizer Company

Meridian Medical Technologies™, Inc.
6350 Stevens Forest Road
Suite 301
Columbia, Maryland 21046

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Regulatory Policy Division
Bureau of Industry and Security
Room 2099B
U.S. Department of Commerce
14th Street and Pennsylvania Ave NW
Washington, DC 20230

RE: Request for Comments Regarding the Addition to the Commerce Control List of Items Determined to No Longer Warrant Control Under United States Munition List Category XIV (Toxicological Agents) or Category XVIII (Directed Energy Weapons)

RIN: 0694-AF52

To the Attention of: publiccomments@bis.doc.gov

Dear Sir or Madam,

Meridian Medical Technologies, Inc. (Meridian) thanks you for the opportunity to provide comments on the recent proposed addition to the Export Administration Regulations (EAR) of items determined to no longer warrant control under United States Munitions List (USML) Category XIV or Category XVIII.

Our comments relate to the availability of License Exception GOV in the EAR, specifically GOV §740.11(d), for 600 Series items.

Use of License Exception GOV §740.11(d) for 600 Series items

Meridian manufactures and exports medical countermeasure products currently classified under Category XIV(h) of the USML. Pursuant to the June 17, 2015 BIS proposed rule, these products will be classified under the Commerce Control List (CCL) as 1A607.k and the associated Technology as 1E607.a. These medical countermeasures are the preferred choice of the Organization for the Prohibition of Chemical Weapons (OPCW), which includes Meridian products in the medical kits carried by OPCW Health and Safety Specialists for mission support. As currently written, Section 740.2(a)(13)(v) limits the

use of License Exception GOV (§740.11) for 600 Series items to subsections §740.11(b) or §740.11.(c). Excluded from this is §740.11(d), which authorizes the use of License Exception GOV for exports related to International Inspections under the Chemical Weapons Convention. Availability of §740.11(d) for 1A607.k and 1E607.a items would allow Meridian to swiftly respond to orders from OPCW for medical countermeasure products.

Proposed Change to the EAR (in bold):

Meridian hereby requests that §740.2(a)(13)(v) be modified as follows:

"(v) License Exception GOV (§740.11(b) or (c) of the EAR, **or §740.11(d) for any item controlled under ECCNs 1A607.k and 1E607.a**)".

Further Information on OPCW's Use of Meridian's Medical Countermeasures:

OPCW's Health and Safety Specialists carry a wide variety of pharmaceuticals and medical equipment to provide medical services to their staff on missions to Member States. The units, consigned to OPCW in the Hague, are intended for use by OPCW staff only and remain in the custody of the OPCW at all times, while on missions to Member States and elsewhere. The OPCW, in cooperation with a supervising pharmacist maintains a strict control regime over such pharmaceuticals.

Therefore, we hereby request that §740.2(a)(13)(v) be modified as noted above.

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We believe the suggested modification will allow all exporters of such medical countermeasure products be more responsive to the needs of the Organization for the Prohibition of Chemical Weapons, and to provide critical medical treatment options for their personnel.

Thank you for considering our comments.

Respectfully,

Amy Weber

Amy Weber
Manager, Trade Controls
Amy.weber@meridianmt.com
443-259-7856