The Boeing Company
929 Long Bridge Drive
MC 7949-5929
Arlington, VA 22202-4208

August 17, 2015

Mr. C. Edward Peartree, Director
Office of Defense Trade Controls Policy
Directorate of Defense Trade Controls
Department of State
SA–1, 12th Floor
Washington, DC 20522–0112

Ms. Hillary Hess, Director
Regulatory Policy Division
Office of Exporter Services
Bureau of Industry and Security
Department of Commerce
14th Street and Pennsylvania Avenue NW
Washington, DC 20230

Subject: ITAR Amendment—Categories XIV and XVIII; RIN 1400-AD03 & 0694-AF52

Reference: Federal Register/ Vol. 80, No. 116/ Wednesday, June 17, 2015/ Proposed Rule: International Traffic in Arms ("ITAR") (Revisions of U.S. Munitions List Categories XIV and XVIII)
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)

Dear Mr. Peartree, Ms. Hess,

The Boeing Company ("Boeing") appreciates the opportunity to provide comments on the proposed *ITAR: Revisions of U.S. Munitions List Categories XIV and XVIII* and *CCL: Addition of Items Determined to No Longer Warrant Control Under USML Category XIV or Category XVIII*, published June 3rd 2015.

We have reviewed the proposed changes to U. S. Munitions List ("USML") Category XVIII – Directed Energy Weapons and the related items for movement from the USML to the export control jurisdiction of the Commerce Control List ("CCL"). Overall, these changes appear appropriate and clear. Movement of tooling, production equipment, test & evaluation equipment, test models and related articles of commodities related to USML Category XVIII reflects the objectives of Export Control Reform and we appreciate the interagency effort to affect this change.

Thank you for the opportunity to provide comments. Please do not hesitate to contact me if you have any questions or need additional information. I can be reached at 703-465-3505 or via email at christopher.e.haave@boeing.com.

Sincerely,

Christopher Haave
Director, Global Trade Controls