SCOTT SAFETY
A Tyco Business

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Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
Room 2099B
14th Street and Pennsylvania Avenue, N.W.
Washington, D.C. 20235

Re: BIS-2015-0023 (RIN 0694-AF52)

Dear Sirs/Madams:

I am writing on behalf of Scott Technologies Inc. (a/k/a Scott Safety) a premier manufacturer of innovative respiratory and personal protective equipment and safety devices for firefighters, industrial workers, police squads, militaries, homeland security forces, and rescue teams around the world. With five global manufacturing locations, Scott products protect thousands of individuals each day from environmental hazards including smoke, toxic fumes, combustible gasses, falling objects and contaminants. For decades, the companies of Scott Safety have been adapting, bringing new products to market, moving into new industries and expanding into new regions.

Scott Safety is specifically interested in contributing to the export reform effort in order to ensure that the resulting regulations do not have an adverse impact on the industries we serve. As a result, Scott Safety is providing the following comments in response to the U.S. Departments of State and Commerce's request for public comment on the proposed revision of U.S. Munitions List Category XIV - Toxicological Agents, Including Chemical Agents, Biological Agents, and Associated Equipment. Specifically Cat XIV(f) relating to equipment and its components, parts, accessories, and attachments specifically designed or modified for military operations and compatibility with military equipment.

Scott Safety recommends that DDTC / BIS move forward in aligning USML Cat XIV(f) under the new proposed ECCN 1A607: Military dissemination "equipment" for riot control agents, military detection and protection "equipment" for toxicological agents (including chemical, biological, and riot control agents) and related commodities. Alignment under the new ECCN will allow for better accessibility for the sales and marketing of current products originally designed for military use, but now being used daily in the commercial arena. In addition, aligning 1B607 to cover test, inspection, and production equipment and related commodities "specially designed" for the development or development, production, repair, overhaul, or refurbishing of items classified under ECCN 1A607 or 1C607 or USML

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Category XIV would allow for easier maintenance of service, warranty and repairs of products classified under 1A607. ECCN 1E607 will allow for easier collaboration between facilities in the United States and those located in A:5 countries on new product development, as well as the service, warranty and repair of such items.

Moving these items to a different export control regime, will significantly change exporters' compliance obligations, as these items will have different licensing vehicles and export control requirements. The products manufactured by Scott are for the protection of individuals against contaminants such as tear gas, riot control and CBRN (chemical/biological/radiological/nuclear) agents.

Thank you for the opportunity to provide this comment.

Sincerely,

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