ON Semiconductor Corporation
1964 Lake Avenue
Rochester, NY 14615

JOHN FRENETT
Product Marketing
Direct Line: 585-784-5504

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

Email: publiccomments@bis.doc.gov

Re: RIN 0694-AF75
Revisions to Category 6 Sensors and Lasers /
Increased Controls for Night Vision Items

Dear Ms. Hess:

ON Semiconductor is pleased to provide comments regarding proposed changes to the EAR specific to category 6A002. Previously, ON Semiconductor submitted comments in response to the draft proposal of May, 2015. As with its prior input, the focus of today's comments will be the company's KAE-series of devices, EMCCDs (Electron Multiplication CCDs) controlled by the EAR via ECCN 6A002.a.3.g.

ON Semiconductor is a Fortune 1000 company, with over 24,000 employees around the world generating $3.5B in revenue (2015). The company offers a comprehensive portfolio of energy efficient power and signal management, logic, discrete and custom solutions to help design engineers solve their unique design challenges in automotive, communications, computing, consumer, industrial, LED lighting, medical, military/aerospace and power supply applications. One of ON Semiconductor's key product lines, image sensors, accounts for over 20% of revenue. As previously noted, the context for comments submitted both in 2015 and now is EMCCDs, a subset of the company's larger image sensor business.

We recognize that it is the intent of the Departments of Defense, State and Commerce to control items having an ability to image in low light. Comparing the May 2015 draft of proposed regulations with the proposal issued on February 19, 2016, one can appreciate the

degree to which agencies reviewed and considered comments. There are very significant differences between the proposals. Clearly, migration away from parameter-driven "bright lines" (that unintentionally captured dual use items) and nomenclature-driven regulation ("permanently encapsulated sensor assembly"), substituting "specially designed" as a criterion, is helpful. As an industry participant in the process, ON Semiconductor appreciates both the invitation to comment, and how input was assimilated in the rewrite.

In sum, ON Semiconductor believes recently proposed changes applicable to EMCCDs represent an improvement in comparison to the May 2015 draft. Regarding questions or comments, feel free to contact either (Daryl.Hatano@onsemi.com Tel: +1 408 542 1176), or John Frenett (John.Frenett@onsemi.com Tel: +1 585 784 5504).

Sincerely,

John E. Frenett
Product Marketing
ON Semiconductor