March 15, 2016
Regulatory Policy Division
Bureau of Industry and Security
U.S. Department of Commerce
14th Street and Pennsylvania Avenue NW., Room 2099B
Washington, DC 20230

By email to publiccomments@bis.doc.gov

RE: RIN 0694–AF75

Dear Sirs/Madams,

I am writing on behalf of the Association of University Export Control Officers (AUECO), an association of over 155 senior export practitioners with export compliance responsibilities at more than 100 accredited institutions of higher education in the United States. AUECO is committed to monitoring changes in the administration of export laws and regulations that could affect transactions and collaborations in academia. AUECO 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 academic pursuits, and offer the following comments.

The current proposed rule removes much ambiguity from the previous version. In particular, the removal of the proposed ECCN 6x615 and consolidation of ECCNs corresponding to the USML Category XII into the single 7x611 series is clear and sensible. The use of the "specially designed" criteria in the ITAR provides a clear path for the exclusion of clearly dual use or civilian use items from overly rigid controls. We believe, however, that additional clarity could be added to the "specially designed" criteria by consistently making the criteria specially designed *for a military end use* throughout the category. I have attached our corresponding comment to the Department of State on Category XII proposed changes should you wish further detail on this suggested change.

We appreciate the removal of the worldwide RS control for dual use items and the limitation of the RS control for certain military technology in ECCN 7E611.a. Regarding ECCN 6A003, we do believe that the research community may be burdened with additional licensing requirements when items are deployed for international field research activities where STA will not apply. However, we note that "use" as a defined term has been retained in the description of the related technology controls, which is helpful to the conduct of on-campus research activities where simple operation of covered cameras is required for data collection.

AUECO appreciates the opportunity to provide BIS with the above comments on RIN 0694-AF75.

Sincerely,

Chair
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