NORTHROP GRUMMAN

Northrop Grumman Corporation
Corporate Office

Global Trade Management
2980 Fairview Park Drive
Mailstop 3123B
Falls Church, VA 22042

September 9, 2013

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

ATTN: Brian Baker
Director, Electronics and Materials Division
Office of National Security and Technology Transfer Controls

SUBJECT: RIN 0694-AF64

Dear Mr. Baker:

Northrop Grumman Corporation supports the approach of the Administration to transfer from the U.S. Munitions List (USML) to the Commerce Control List (CCL) items that may be used in military applications and may have originally been designed for a military application, but that the President determines no longer warrant control on the USML, no longer have military uses, or are now used in military and commercial applications. Northrop wishes to thank the Department for the opportunity to comment on the proposed changes identified in RIN 0694-AF64 and offer the following:

1) Recommend the Department review and revise the CCL 2A984 parameters to de-conflict with the parameters included in the Category XI(a)(10). As written, Category XI(a)(10) identifies electronic sensor systems or equipment for detection of concealed weapons having a standoff detection range of greater than 45 meters this conflicts with the CCL 2A984 entry for concealed object detection equipment which includes a standoff distance of 100 meters.

2) Recommend the Department review the power ranges included in the sub-categories associated with 3A001.b.2, 3A611.c.10 and 3A611.c.11 to ensure that everything has been adequately covered. As written, most of the 3A611.c sub-categories have power limits that are similar to 3A001.b.2. ECCN 3A001.b.2.h is the highest in 3A001.b.2 and covers amplifiers above 90 GHz. However, 3A611.c brackets and creates high power limits at 90-110 GHz (c.12), and 110+ GHz (c.13). Should 3A001.b.2 also be revised to limit subcategory .h at 90-110 GHz and include a new subcategory .i at 110+ GHz, so that 3A001.b.2 and 3A611.c have similar band coverage?

Northrop Grumman will be pleased to discuss these recommendations further. Please contact me, at (703)280-4056, or beth.mersch@ngc.com to arrange for any discussions.

Sincerely,

Mary Elizabeth (Beth) Mersch
Director, Export/Import Management
Global Trade Management