From: Patrick.Schwartz@L-3com.com
Sent: Thursday, June 05, 2014 1:11 PM
To: PublicComments
Subject: RIN 0694-AG00

To Whom it May Concern:

L-3 Communications Corporation (L-3) provides the following comments regarding the "Proposed Revisions to the Support Document Requirements of the Export Administration Regulations in Response to Executive Order 13563 Retrospective Regulatory Review" as found in Federal Register Vol. 79, No. 68, 19552 dated April 9, 2014.

L-3 applauds the efforts by the U.S. Department of Commerce, Bureau of Industry and Security (BIS) to streamline its documentary requirements for license applications.

However, L-3 opposes the "Proposed Elimination of Issuance of U.S. Import Certificate, U.S. Import Certificate With Triangular Transaction Stamp, and Delivery Verification Certificate by BIS" based on the following justification:

- L-3 continues to receive requests to provide Import Certificates to foreign companies in order for them to obtain export licenses from their countries' governments including Denmark and Italy. The foreign governments will not issue export licenses without an Import Certificate signed by the U.S. Government.
- The U.S. Department of State, Directorate for Defense Trade Controls (DDTC) has already stopped processing U.S. Import Certificates. In their Federal Register Vol. 77, No. 74, 22668 dated April 17, 2012 with an effective date of May 17, 2012, DDTC stated that BIS and the Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) would continue to process any Import Certificate requirements
- Based on first-hand experience, ATF will only process Import Certificates requested for items listed on the U.S. Munitions Import List (USMIL). L-3 has received two Returned Without Actions (RWA) from ATF for Import Certificates related to 600 Series items that were not specifically identified on the USMIL.

The whole point of the Import Certificate is to facilitate international trade and provide assurances to other countries that their products will not be diverted, transshipped or reexported to another destination except with explicit approval of the Department of Commerce, the Department of State, or the Department of Treasury (now Justice).

If BIS stops processing Import Certificates, this will have a significant impact on U.S. industry's ability to import critical foreign products. This will have a profound impact across industry and hinder U.S. Programs that rely upon foreign participation such as the C-27J Joint Cargo Aircraft.

L-3 kindly requests that BIS reconsider its proposal and continue to process Import Certificates.

Regards,
Patrick

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