



Global Watch®

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Terrorism & Security

Cargo container security process questioned

By Brock N. Meeks

Reporter MSNBC

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WASHINGTON DC- The main tool used by U.S. port inspectors to identify cargo containers at high risk for terrorist use has not been tested to validate its accuracy, a General Accounting Office official told a congressional panel Tuesday during a closed-door session on port security. Further, personnel trained to use the computerized system haven't been tested or certified on the system's use, "so there is no assurance that they have the necessary skills" to adequately operate the system, the GAO official said. Those are among the findings of a preliminary GAO report presented by Richard Stana, director of Homeland Security and Justice for the GAO, during a congressional field hearing held Tuesday in Camden, N.J.

The report examined the screening and security processes used by the Customs and Border Protection division of the Department of Homeland Security to inspect oceangoing cargo containers arriving at U.S. ports. The hearing of the House Oversight and Investigations Subcommittee was largely closed to the media

due to the sensitive nature of the topics discussed.

However, the publicly released GAO findings provide a clear picture of the security gaps still plaguing U.S. ports of entry.

Although noting that CBP had made progress on the security issue, "unfortunately, the subcommittee and GAO have identified serious weaknesses," in the sea cargo inspection system, said subcommittee Chairman James Greenwood, R-Pa. "These weaknesses are not insurmountable, but unless

Cargo containers are extremely vulnerable

they are dealt with I cannot feel confident in (CBP's) ability to interdict terrorist smuggling of weapons in ocean-going containers."

Cargo container security has been a hot-button issue in Congress for more than two years. The problem is one of numbers: Some 16 million oceangoing cargo containers enter the United States each year. The CBP has the

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Speaking the Language of E-Internationalization

by Bruno Gralpois

Over 230 countries, 6,700 languages, 147 currencies, 24 time zones... And you were worried about the catchiness of your email subject line?

The digital economy is unavoidably global in nature. Yet launching international email marketing campaigns is still uncommon. Part of the reason is that it is not a simple undertaking. Countries show various levels of email marketing readiness, consumer acceptance, and business sophistication. The most frequent question I get from U.S. companies is this: Where should I take my email marketing campaigns next? Well, let's find out.

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Notes from the Executive Director

Global Perspective: a “Normal” Year

by *Dr. Donald N. Burton*



As you read this issue of GlobalWatch®, you will quickly note that it has grown in size from eight to twelve pages. There are several reasons why this happened. Foremost, is that we are trying to bring you a “fuller” global view. We began this issue with an increased emphasis on trade compliance. Not just U.S. trade, but trade compliance in all countries as it relates to the each country’s national security. As the article on E-internationalization points out, we live in a digital economy that is forever linked together, with huge streams of data passing from all corners of the world. Instant communication, where ship manifests arrive long before ships do, raises issues about port safety. Bioterrorism concerns cause countries to react to the threat and some companies violate export regulations and get fined.

All in all, a wide array of new topics will fill future pages. We started a column announcing new industry related books. A new section titled *Perspective* began this issue that we hope will attract guest commentators to voice their learned perspectives on topics of interest to our now nearly 100,000 readers around the world.

Was 2003 a normal year? I don’t think so. The world is very quickly evolving into the global marketplace that economist, Douglas A. Irwin, dreams about and hopes for as he explores the topic in his new book, Free Trade Under Fire. (See page 6) There were so many Free Trade Agreements signed between countries in 2003 that it is nearly impossible to gauge the impact of them. In the months and years ahead, one thing is certain. As we look back at the events of 2003, we will reflect that it was just another now “normal” year.

The next U.S.
 Customs Broker
 Examination
 is the first Monday
 in April 2004

Africa Focus
 in the
 March / April
 issue of
GlobalWatch®
 Contributions
 contact
 info@expandglobal.com

Australia Focus
***No back step for
 women in trade***

(MELBOURNE) Being a woman in business is no disadvantage for a growing number of Australian women proving they can hold their own in the boardrooms and offices of the world, Federal Parliamentary Secretary to the Minister for Trade, De-Anne Kelly said today.

“From motor appliance manufacturing, to industrial baking equipment and chic fashion boutiques, Australian women are forging ahead with creative flair and business acumen,” Mrs. Kelly said.

“Austrade is working with many successful businesswomen who are helping to achieve the goal of doubling Australia’s exporters by 2006.

“Austrade’s Women in Export Program aims to encourage the women running one third of Australia’s small-to-medium enterprise (SME) businesses (ABS, June, 2001) to get into exporting.”

The program increases awareness of Austrade assistance services such as the New Exporter Development (NED) program and the Export Market



Development Grants (EMDG) scheme, encourages successful female exporters to mentor others, and promotes exporting to women’s business networks.

Mrs. Kelly said successful female exporters supported by Austrade include Angela Pankau, co-owner of a company that manufactures and supplies parts to upgrade popular old cars like Mustangs and Falcons, and Amanda Hicks of the Sydney business Autobake Pty Ltd, which designs and manufactures industrial cooking equipment.

Other examples are Dr. Victoria Gordon, Managing Director of EcoBiotics Limited, a Queensland-based company that is using tropical rainforest plants to develop potential anti-cancer treatments, and fashion designers Sally Smith Designs of Sydney and Melbourne-based Ripe Maternity.

“These businesswomen are achieving great export success, often in traditionally male-dominated areas. They are inspirational role models for us all. Supporting more women to

Women - Cont. on page 5



Continuing Education Equivalent Training

In June 2002, the Certification Board of Governors set the requirement that all *Certified U.S. Export Compliance Officers*®, commencing one year after attaining certification, must complete two **Export Compliance Update courses**, equalling 10 Continuing Education Units (CEUs) each year to maintain certification. Specifically, the policy states that proof of taking these courses or equivalent training will meet this requirement. Generally accepted equivalent training is:

- ◆ **Society of International Affairs** (SIA) Two-Day Semi-annual Conference- 3 CEUs
- ◆ **SIA** One-Day Topic Specific Training Session, Seminar or Workshop- 1.5 CEUs
- ◆ **Bureau of Industry & Security (BIS)** Annual Update Conference- 3 CEUs
- ◆ **BIS** One-Day Seminar, Training Session or Workshop - 1.5 CEUs
- ◆ **Unz & Company** Full day export compliance seminar - 1.5 CEU’s
- ◆ **Third-party consultive training**

upon review - CEUs to be undetermined

- ◆ **Corporate** (in-house) export
- ◆ **Compliance training** - upon review CEUs to be undetermined
- ◆ **Other training** or courses may meet this requirement upon review.

If this continuing education requirement is not met, individuals are required to pass the *current* certification examination process to reactivate their certification.

The Export Compliance Update courses offered by IIEI are self-directed study courses that contain all of the published changes to EAR and ITAR and other relevant regulations. In addition, they contain commentary and a discussion by a content area expert. To validate the learning, the last element of the Update Courses is a “open book” multiple choice examination.

For more information on Continuing Education Requirements, call (800) 474-8013 or (602) 648-5750 or visit:
www.usexportcompliance.com

Australia Focus

U.S. Bioterrorism Act comes into effect

With the new U.S. Bioterrorism Act coming into effect on 12 December 2003, Australian food exporters will need to comply with requirements the legislation imposes to avoid delays in shipments.

Austrade's General Manager, Government Industry & Policy Group, Fiona Buffinton said the U.S. Bioterrorism Act, designed to protect the U.S. food supply from bio-terrorist attacks will require exporters to register with the U.S. Food and Drug Administration and give advance notice of incoming shipments.

"Australian companies exporting food to the United States should be aware that they will now be required to fulfil additional administrative and compliance measures," Ms. Buffinton said.

"These requirements apply to all Australian companies exporting food for human and animal consumption to the United States, except meat, poultry and egg exports covered already under the U.S. Department of Agriculture jurisdiction.

"The new regulations are not meant to impede the movement of goods or hold up trade, they are strictly measures taken by the U.S. Government to protect consumers," she said.

It is important for exporters of food to the US as well as other Australian businesses supplying

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Terrorism Cont. from page 1

resources to inspect only a fraction of those.

Terrorism experts, both private and governmental, maintain that these cargo containers are extremely vulnerable to some form of terrorist action, such as the smuggling of a weapon of mass destruction. Beyond the loss of life and physical damage such an attack might cause, there's the economic loss, too. In a 2002 simulation of a terrorist attack at a U.S. port involving cargo containers, every seaport in the country was shut down, resulting in a loss of \$58 billion to the U.S. economy.

To make the best use of scarce resources, the CBP uses the Automated Targeting System (ATS) as the "premier tool" to help ferret out high-risk containers, according to Charles Bartoldus, director of CBP's National Targeting Center. But ATS, which is a computerized system, began life as an anti-narcotics system used by the old U.S. Customs Service to help ferret out possible drug smuggling. In the wake of the Sept. 11, 2001, terrorist attacks, that system was forced into service as an anti-terrorist weapon. And in that capacity it has struggled, the GAO report says.

The ATS makes its decisions on which containers are at most risk primarily by analyzing the data that comes from inventory sheets, called manifests, sent electronically by incoming ships. But the GAO found that terrorism experts, members of the

international trade community and CBP inspectors themselves "characterized the ship's manifest as one of the least reliable or useful types of information for targeting purposes."

Beyond the unreliable data, the GAO found that shippers can "revise" the manifests up to 60 days after the cargo has arrived at a U.S. port. CBP officials said that about 33 percent of these revised manifests would have resulted in the containers' being targeted by ATS for inspection. "But by the time these revisions were received," the GAO report says, "it is possible that the cargo container may have left port."

No way to know

And in fact, CBP has no real way of knowing if ATS is even doing an adequate job with the data it does have. "CBP has not attempted to test and validate ATS through simulated events," the GAO report says. Without that testing, "CBP will not know whether ATS is a statistically valid model and the extent to which it can identify high-risk containers with reasonable assurance," the report says. Ironically, only two known instances of simulated tests have taken place, the report says, and both of those were done by ABC News, when, in two separate years, the news organization simulated the smuggling of highly enriched uranium into the United States. While in both instances ATS targeted the container carrying the mocked-up device used by ABC

Terrorism Cont. on page 10

Salary Increases for Export Professionals in 2003

Here are a few highlights of the 2003 pay figures for international trade personnel from the Institute of Management & Administration's (IOMA) annual industry survey. The complete survey details and other important articles and information are available to subscribers of IOMA'S Managing Exports® report service.

- export/import/compliance managers with five years or less of experience average \$63,000, compared with the \$82,031 taken home by their peers with 11 to 20 years in the trenches.
- among export/import/compliance managers, the gender-based pay gap is nearly \$30,000, with males out-earning their female counterparts \$93,696 to \$62,875.
- among international sales/marketing managers (male: \$83,981; female: \$42,500) and logistics/traffic/shipping managers (male: \$82,279; female: \$47,500), titles for which male pay nearly doubles that of females.

For complete details on how to subscribe to their excellent report service, go to www.ioma.com or contact them at Institute of Management & Administration, 29 W. 35 St., New York, NY 10001. Contact: Subscriber Services at 212-244-0360.

Women - Cont. from page 3

get into exporting is good news for our community, our economy and for local job prospects," Mrs Kelly said.

For more information about the "Women in Export Program" contact Austrade email: info@austrade.gov.au.

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The Democratization of the Global Economy

The growth of e-commerce has brought a substantial reduction in the cost of entry to global markets. For the first time, small and large businesses alike are able to extend their e-commerce operations overseas. Suddenly, companies must decide whether and how to use email marketing in international markets.

Companies that market aggressively to prospects and customers by email are anxious to spread their activities outside North America for undeniable reasons. According to United Messaging, "there are more electronic mailboxes outside the U.S. than within it for the first time in the history of the electronic messaging market."

The keys to an overall globalization strategy are flexibility and adaptability. Planning

for today's market reality is not enough; an effective international strategy must be able to react to and accommodate the shifts and bumps that are inevitable when competing on the global stage.

You have the ability to reach customers all over the world. But between your business and its global destiny lie challenges that go beyond simple translation. It's time to speak the language of e-internationalization.

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Announcement Certification Board of Governors New Web Address

www.industrycertification.org

ITAR Faculty Addition

The International Import-Export Institute is pleased to welcome Lt. Col. Glenn Danielson as an Adjunct Faculty Member.

Colonel Danielson's current assignment with the U.S. Army is as a *Defense Trade Licensing and Agreements Officer* for the Director of Defense Trade Controls, U.S. Department of State. In this capacity he reviews international business agreements related to the export of U.S. technology subject to the International Traffic in Arms Regulations (ITAR). He holds a Bachelor of Science degree from Northeastern University in Mechanical Engineering and possesses a Master degree in International Affairs with concentrations in East Asia and International Finance and Banking from Columbia University. Welcome!

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these exporters to understand how the requirements of the Bioterrorism Act will impact on them and what they will be required to do after it comes into effect in the U.S. on 12 December 2003.

Enquiries should be directed to the Department of Agriculture, Fisheries and Forestry (DAFF) on 02 6272 5507 or through AUSTRADE.

For more information contact:

U.S. Food and Drug Administration
HFS-681
5600 Fishers Lane
Rockville MD 20857

800-216-7331 or 301-575-0156

In Compliance....

Book Announcement

To Supply or to Deny: Comparing Nonproliferation Export Controls in Five Key Countries by Michael Beck, Richard Cupitt, Seema Gahlaut, and Scott Jones

Weapons of mass destruction (WMO) are not necessarily acquired as entire systems. They are often assembled from parts and materials, many of which are dual-use - i.e., of both commercial and military utility. This is the Achilles' heel of non-proliferation conventions.

This book is both reassuring and alarming in its analysis of export control regimes. At most national levels, regulation is rapidly making firms more accountable, and more industries are routinely implementing internal compliance programs. This detailed and thought-provoking book will be of great value to all concerned with security objectives for the twenty-first century.

Free Trade Under Fire

by Douglas A. Irwin

In 1824, the British historian Thomas Babington Macaulay wrote: "Free trade, one of the greatest blessings which a government can confer on a people, is in almost every country unpopular." Almost two centuries later, Macaulay's dictum still remains true. For economists, world trade can be an engine for economic expansion and the raising of living standards.

Macaulay aptly sums up a fundamental incongruity about trade policy: despite the palpable benefits of free trade, it is frequently the object of condemnation rather than approbation. That condemnation has resulted in many misconceptions and misunderstandings about the benefits of international trade, the structure of U.S. trade policy, and the role and function of the WTO. This book seeks to address some of these misconceptions and is offered in the modest hope that it might improve our understanding of the trade policy issues that confront us.

Expert Advice on: Trade Enforcement: Successor Liability

by Giovanna Cinelli

The Department of State continued its focus on enforcement, with a particular emphasis on successor liability. Over the last two years, State has settled four cases, each deriving from acquisitions of companies that had allegedly violated the AECA/ITAR. The most recent case settled on November 24, 2003, with EDO Corporation. In the consent agreement, the Department settled charges stemming from violations by Condor Systems, Inc., an entity acquired by

EDO after the alleged violations had occurred. The Agreement included an express statement of EDO's successor liability responsibilities and a requirement that EDO institute strengthened procedures for acquisition due diligence. With the execution of this Agreement, and the earlier three, this pattern counsels increased vigilance by acquiring companies in conducting acquisition due diligence and ensuring that any and all existing violations are fully closed or, at the very least, indemnified, prior to the closing of an acquisition.

Buyer Beware

SNAP+ Deadline Extended

The Bureau of Industry and Security has extended until February 12, 2004 the deadline for mandated implementation of the Simplified Network Application Processing (SNAP+) system. This extension allows the public additional time to comment on the rule. Written comments should be e-mailed to: rpd@bis.doc.gov, or faxed to 202-482-3355

Giovanna Cinelli is a partner of Patton Boggs LLP, Attorneys at Law, a national law firm. She concentrates her practice in the areas of export/import control and compliance, investigations, audits, technology transfer, licensing, trade, national security, and industrial espionage issues. She has been a member of the Defense Trade Advisory Group (DTAG) at the U.S. Department of State since 1992 and is currently a Vice Chairman of the Regulatory Working Group of the DTAG. Ms. Cinelli has also served as a member of the Regulations and Procedures Technical Advisory Committee (RPTAC) at the U.S. Department of Commerce. She has also appeared on CNN's Burden of Proof and MSNBC's Hardball with Chris Matthews as an expert on international arms and technology transfers.



**U.S. Bureau of Industry and Security
News and Announcements**

Sun Microsystems, Inc. Settles Charges over Unlicensed Exports and Failure to Comply with Export Licenses

The U.S. Department of Commerce announced that Sun Microsystems, Inc. of Santa Clara, California, and two of its subsidiaries will pay \$291,000 in fines to settle charges involving illegal exports of computers to military end-users in China and Egypt, and for failing to comply with conditions on eight Bureau of Industry and Security (BIS) export licenses. A fourth company, Automated Systems Ltd. (ASL) of Hong Kong, involved in the export to the Chinese military end-user will pay a \$22,000 civil penalty to settle allegations

that it aided and abetted the export.

Assistant Secretary of Commerce for Export Enforcement Julie L. Myers stated that, "The Bureau of Industry and Security imposes conditions on a license to ensure that the export meets our national security concerns. Such conditions must be followed, and, as today's settlements demonstrate, companies that do not adhere to license conditions will be held accountable."

Sun Microsystems will pay a \$269,000 fine and have its **export privileges denied for one year**, although the denial will be suspended. To settle charges that

they aided and abetted the illegal export to China, Sun Microsystems China Ltd., and Sun Microsystems California, Ltd., both of Hong Kong, will each pay an \$11,000 fine and will not participate in transactions subject to the Export Administration Regulations involving the Changsha Institute of Science and Technology (CIST) in the People's Republic of China, the Chinese military end-user, for one year.

The settlement of the cases against Sun Microsystems was for 24 charges, including four charges for the two exports to military end-users, eight charges for breaching license conditions, and three charges for not fulfilling its duties as a licensee. BIS charged that, in February 1997, Sun Microsystems exported an Enterprise server to CIST without the required license. CIST offers courses specializing in missile and

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Nominations for Certification Board of Governors' Various Committees Still Open

The Certification Board of Governors is accepting nominations for volunteers to serve on the various committees that help set the standards and policies of industry certification.

www.industrycertification.org
Point at CONTACT then click "volunteers" for more information.

Final Ruling by BIS Wassenaar Plenary Agreement.

December 10, 2003
BIS publishes a Final Rule that implements the December 2002 Wassenaar Plenary Agreement.

For more visit
www.usexportcompliance.com
Click **NEWS**



Industry Certification Test Fees Increase

Effective December 1, 2003, the following increase in test fees were approved by the Certification Board of Governors

Description	Price
Registration	US \$30.00
CITLS	US \$295.00
CITDS	US \$295.00
CITMS	US \$295.00
CITFS	US \$295.00
CITP	US \$370.00
CITM	US \$590.00
Retest (all)	US \$175.00



Perspective

Ethics in Trade Compliance

By Dr. Donald N. Burton

Ethics in business was again in the spotlight recently when two senior level managers at the Boeing Corporation were fired for ethics violations. The end result of this was the resignation of its CEO, Phillip Condit. At the epicenter of the ethical dilemma is how can any company insure the “correct” behavior of its employees. In an attempt to deal with this topic, companies have discovered there are many alternatives that can be used to address this issue.

There are two traditional ways that companies have dealt with ethics. Both have their proponents. The first is the Code of Conduct. Companies develop a code as a formal policy of behavior of employees. It spells out in specific terms what is and what isn't acceptable behavior within the organization. When employees are hired they are obligated to read and sign the company's Code of Conduct. Violators of the code receive negative sanctions and possibly termination.

Other companies use a “Company Pledge” to direct behavior. Generally, like the pledge Girl or Boy Scouts make in joining scouting, company employees pledge to be honor

bound to abide by their pledge. There is little direct linkage between the pledge and control mechanisms with a company, which means that it typically does not have the formality or sanctions of Human Resource's Code of Conduct. But generally it is aimed at the same thing: members agree to adhere to a prescribed set of behaviors.

There are more formal ways companies and organizations attempt to control the behavior of their members. Some companies

How can any company insure the correct behavior of its employees?

have new employees sign legal contracts or agreements that stipulate with exact preciseness the acceptable behaviors of workers. An example would be software engineers know exactly who owns the intellectual property they produce whether it was done at the office or at home during the term of employment.

Companies also try another approach: formal training seminars. Whether the training is performed by in-house training personnel or by vendors, this can be a very good way to insure that all employees understand the

company's ethical position and what is required of them. In the recent case of Boeing's ethical lapse, which resulted in the firing of two employees, all Boeing employees were required to immediately attend a class on ethics. Every Boeing location received a visit from trainers who spent four hours lecturing about ethics and how important ethical performance of all workers is to the success of the company.

Often used, but hard to manage, is controlling behavior through negative sanctions or threats. When the organization's environment does not support ethical behavior, except through policy statements, it is very difficult for employees to know or model what constitutes acceptable behavior. There can be mixed messages. If “Make sales at all costs” is taken literally, the Code of Ethics is often forgotten. Knowing this dilemma, many companies impose huge penalties on those that violate the company's ethical rules. When that happens, there is a disconnect between ethics and the required actions.

Far and away the best method of instilling ethical values in an organization is by “personal example of leadership”. If the President and CEO project and regularly support ethical values in everything they do, those under

Ethics - continued from page 8

them will model that behavior, realizing that it is the way to success in the company. Ethics in any company does not occur simply because the behavior is written on a sheet of paper, filed in a person's employment file and has an employee's signature attesting to his or her acceptance. It must be real, not separate from the daily activities of the organization. And as was mentioned above, it must be totally supported by all levels of management and must be understood by all.

Having ethical situations understood by all is a huge challenge, especially when it comes to trade compliance. The rules are very detailed and dense—difficult for the uninitiated to comprehend. Understanding ethics in general is good, but having an appreciation for the implications of ethical situations in trade compliance is another thing, AND is what is needed. Obviously, not everyone needs to know trade regulations in great detail, but it can be argued that all employees that have any dealings with the exporting of goods need more than just a

cursory crash course on ethics. Where do you begin?

Ask industry training companies or consultants to help you instill a long-term program that will *develop a culture* that includes the values and norms that reflect the ethical values that you deem important to your company. Your culture development program effort must include senior managers, middle managers and workers alike. In order for a company to feel confident in

the ethical behavior of all of its employees, it must invest adequate time and money to that end. Band-Aid approaches don't work. When you peel off the Band-Aid, it is like the situation Boeing found itself in, an ethical problem festering and waiting to happen.

To learn more about Ethics in Trade Compliance, investigate the new course offered by IIEI at www.iiei.edu



The International Import-Export Institute

in answer to your requests

Ethics in Trade Compliance

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Terrorism - continued from page 4.

News (which contained depleted uranium in a sealed lead-lined pipe), it did not detect any anomaly when an X-ray-type device was used, and therefore the suspect container was never opened.

In an effort to maximize the use of ATS, the CBP developed a two-week national training program for inspectors, called “targeters,” to help them make better use of the system. More than 400 targeters have completed that national training; however, CBP has “no mechanism to test or certify their competence,” the GAO says. “These targeters play a crucial role because they are responsible for making informed decisions about which cargo containers will be inspected and which containers will be released,” the report says. Instituting a certification course would provide another benefit, the GAO says: “It would lessen the likelihood that those who did not do well in class are placed in these important positions.”

Another brick in the wall

CBP officials are quick to acknowledge that security doesn’t start and stop with a single system. “An adversary may circumvent any single defense, so CBP does not rely on any one enforcement strategy, facilitation program, inspection process, or technology,” said Bartoldus, CBP’s National Targeting Center director.

Instead, CBP follows what it calls a system of “layered” defense, or several technologies

that all work together at some level. This layered defense concept is one that the Department of Homeland Security has adopted throughout various sectors, like airline security, to ensure that the success or failure of terrorist deterrence doesn’t rest in a single system.

Besides the ATS, Bartoldus, in written testimony to Green’s subcommittee, also noted: The **National Targeting Center (NTC)** — A single location for targeting technology and subject matter expertise. The **Container Security Initiative (CSI)** — A means of pushing U.S. borders outward by screening cargo overseas and working jointly with host nation customs agencies on exams prior to lading U.S.-bound cargo. The **Customs-Trade Partnership Against Terrorism (C-TPAT)** — A vehicle for securing global supply chains and the development of smart and secure containers.

And **Non-Intrusive Inspection Technology** — Advanced inspection equipment to screen shipments rapidly for [weapons of mass destruction], nuclear or radiological materials, terrorist weapons, and other contraband. Bartoldus also defended ATS, saying that it’s a “flexible” system that CBP “works constantly to enhance and refine,” such as by making sure intelligence data also is input and available for help in making high-risk analysis. As for ATS being subject to faulty decision-making due to faulty data input, particularly from the suspect manifest information, Bartoldus said, “It should be noted that the

ATS can detect anomalies in both accurate and inaccurate data.”

Courtesy MSNBC Interactive © 2003



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800-474-8013

www.usexportcompliance.com

Sun - Cont. from page 7

rocket research and development technology. In December 1997, Sun Microsystems exported two Enterprise servers to Egypt knowing that the Egyptian Army was the end-user. BIS also charged that Sun Microsystems did not fulfill its duties as a licensee on BIS export licenses, altered an end-user verification certificate and submitted the falsified certificate in response to a subpoena, and failed to file shipping documents as required by eight licenses.

BIS Public Affairs
202-482-2721



Lower Division Courses Announced

Due to the huge demand for lower division general education courses, the International Import-Export Institute plans to roll out new courses throughout the 2004 and 2005 school years. The new courses will range from introductory courses in social and physical sciences, to college level math and writing and other courses needed to fill out their existing bachelor degree program.

As each new course is accredited, it will become available through IIEI's online program. "We have many students that enter the degree

program still needing a course or more to fill their elective or other requirements," said Richard L. Oxford, IIEI Director of Operations. Currently, students must bring 62 credit hours from other accredited colleges to meet their degree requirements. "IIEI's new courses will allow students to obtain the credits here," said Oxford. When complete, IIEI will then offer all required courses to complete the prestigious Bachelor of Science in International Trade Management degree program.



Synchronize Program Celebrates Second Anniversary

Global Compliance Supply Chain Coordination

It is expected that the year 2004 will be a banner year for the International Import-Export Institute's Synchronize Program. What began as a way to help widely dispersed employees of global companies be in the same training class without travel issues, quickly expanded to include globally distant suppliers as well.

"It is a natural fit," says Richard L. Oxford, IIEI's Chief Operations Officer. "When it comes to compliance training, you really need to have the entire supply chain involved. Anything less puts a company at risk. This program

allows companies to group critical people in the training-- wherever they happen to live in the world." The program is flexible, allowing companies to schedule private training that focuses on their compliance training needs. It uses an asynchronous online format that does not interrupt their workload.

For more information about how this program can help your company achieve greater compliance success, call a Training Advisor at (800) 474-8013 or (602) 648-5750.

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IIEI Awards Certifications

Congratulations are due to the following individuals on their successful completion and recent award of the respective certifications.

Certified U.S. Export Compliance Officer™

Alvis Guillen, Florida

Certified International Trade Documentation Specialist™

Flora Fung, Canada

Certified International Trade Educator™

Michael Assaf, Bayer Corp.

Adrienne Braumiller, Law Offices of Braumiller & Rodriguez

Lt. Col. Glenn Danielson, U.S. State Dept.

Robert Sherman, AMI Consultants

Daniel Squire, U.S. Commerce Dept.

Steve Varela, Consultant



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Students with outstanding performance for two or more semesters.

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Julie Hawley

Cyrus Katrak

Christina Lawson

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John Prieco

Jill Thureau

Blake Williams

Janet Keiser

Janie Tuchon

Delina Gaspard

Congratulations!



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