



Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE
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Dunlap-Stone University launches e-Learning Project in Jordan

Courtesy Jordan Times

AMMAN (JT) - Dunlap-Stone University (DSU) officially launched an e-learning project, titled, "Excelling in Learning", in Amman Jordan. In a message to attendees at the launch, HRH (His Royal Highness) Prince Asem Ben Nayef voiced appreciation of the university's efforts to develop the distance-learning model in the Kingdom and other Arab states. The Prince also expressed support for the project, which he said will help advance the e-learning sector in the Kingdom. The project is expected to have a huge impact on universities and their students throughout the Arab world. DSU



HRH Prince Asem Ben Nayef

is pleased to gain this support and to partner with these excellent schools in bringing 21st century educational technologies to the region, said Dr. Abed Baidas, DSU's Middle Eastern representative.

Dunlap-Stone University is a nationally accredited private university operating fully online with students in over 100 countries. It began in 1995 as the International Import-Export Institute, an organization committed to advancing best practices and education related to international trade topics worldwide.

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BIS Website Solicitation

As a service to exporters, the Bureau of Industry and Security (BIS) has established a webpage where sources of publicly available information on Commodity Classifications can be found. We invite companies to participate in this opportunity by providing information on where Commodity Classification information related to your products may be obtained.

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Mobilizing the Private Sector Latin America and the Caribbean

The conclusion of the conference attendees was that the private sector should organize itself at regional level for effective public – private collaboration if it wants to play a pro-active role in regional integration for enhancing competitiveness. This was the key message emphasized by participants at an ITC event on Mobilizing the Private Sector at the 2nd Regional Review on Aid for Trade held in Montego Bay, Jamaica on 6-8 May 2009.

"The national chambers of commerce have not come together in the region. We have not yet got the people to get over their vested interests for achieving the overall good," said one participant from the private sector. "Fragmentation of private sector views is a challenge which needs to be overcome," said another.

Good infrastructure – physical and institutional – is a must to improve economic competitiveness in the region.

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Notes from the President

Acceptance of DSU Worldwide

by Dr. Donald N. Burton



In a transition period covering slightly more than a year, I have seen the spread of Dunlap-Stone University's online programs into many countries and the number of certification programs increase greatly. I attribute much of this growth to our partner organizations worldwide.

The universities, colleges and training centers that offer our programs have done an incredible job in training people to take the examinations for the various certifications we offer. Thank you.

We have many new partners added this year so far and we expect hundreds of schools to become Approved Providers of our Certified Exporter® training program before the year is out. I am pleased that this program is becoming so popular, but I am most pleased about the impact this has in bringing the world together under a single standard for international trade.

As you read this issue you will get a sense of how busy we are in all regions of the world. Our eLearning Project in Jordan is about to transform education in the region by bringing knowledge to people normally considered too distant and remote to receive a quality education. All across Africa people are learning international trade principles and it is making a difference. (See article page 3 about African women in the International Trade Centre's *Access* program.) As you read about the concept of *comparative advantage* (page 3) you will glimpse what the global marketplace's potential is for people living in emerg-

ing market countries. It is a very exciting time for them.

There is something for everyone in this issue: plenty of trade compliance related topics; articles about general trade topics too, not to mention the article on page one about the International Trade Centre's conference on mobilizing the private sector for regional growth. The article on Voluntary Self-Disclosures (VSD) written by the BIS staff contains some interesting views on the subject of VSDs.

I get a constant stream of comments about our job posting section on our web site that is FREE (no cost) to companies or individuals to use. If you're looking, or simply curious, go to IIEI JobNet on the IIEI's main page.

Every time we finish a heavily requested course and get ready to offer it for the first time, our staff gets excited. That is the case with Export Compliance Audit: A *disciplined approach* (page 11). It will be offered for the first time in July. We had a lot of industry assistance building it for you. I hope you like it.

I am proud to introduce you to someone you've probably already been talking to: Brice Macartney (page 14). It is always good to put a face on someone you've only talked to on the phone.

All in all, a very diverse issue of GlobalWatch®. I hope you enjoy it. Again, as always, thank you for your continued strong support. Take care.

Women Across Africa Go Global



Tanzania businesswomen are putting to practice what they have learned in the *ACCESS!* programme. Already, there are over 20 company profiles on the *ACCESS!* Tanzania portal. According to Rose Aziz, *ACCESS!* Participant, “I came out armed with a compass”.

Tanzanian businesswomen are ready to do business. View their company profiles to see fine work in Tanzanian handicrafts, textiles and many other sectors. Go to [ACCESS! Tanzania](#).



ACCESS! training sessions in Dar es Salaam attract companies from a variety of sectors including: craft industry, textile and clothing, cosmetic, chemical and agro processing industries. The team of trainers works diligently to ensure that the participants gain as much practical information as possible about the challenges and opportunities of going global. For more information, visit [ACCESS! Tanzania](#).



<http://womenexporters.com/index.php?count=Tanzania>

The *ACCESS!* web portal, WomenExporters.com, is the most comprehensive source of export information, tools and assistance for African businesswomen pursuing international markets. The site provides an opportunity for companies in nine African countries to register their profiles and to promote their company's capabilities. Visit them online at www.womenexporters.com

ACCESS! for African Businesswomen in International Trade is a regional technical assistance programme, executed by the International Trade Centre Geneva, and Trade Facilitation Office Canada, as part of their joint Programme for Building African Capacity for Trade funded by the Canadian International Development Agency.

A Nation's Comparative Advantage

In economics, **comparative advantage** refers to the ability of a person or a country to produce a particular good at a lower marginal cost and opportunity cost than another person or country. It is the ability to produce a product most efficiently given all the other products that could be produced. It can be contrasted with absolute advantage which refers to the ability of a person or a country to produce a particular good at a lower absolute cost than another.

Comparative advantage explains how trade can create value for both parties even when one can produce all goods with fewer resources than the other. The net benefits of such an outcome are called gains from trade.

The question of value of comparative advantage is not static. Over time, a country or an organization can build/develop a comparative advantage in the marketplace or it can lose its advantage as market demands change or as resource availability changes.

The challenge to countries is what are their comparative advantage and how can they leverage their advantages considering the global marketplace is a dynamic, evolving target.

Emerging countries, it is argued, should take the long term view in developing and leveraging the capacities that they wish to develop into their comparative advantage.

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BIS Update

Bureau of Industry and Security

BIS Announces Validated End-User Program Modifications

WASHINGTON, D.C. – The U.S. Department of Commerce’s Bureau of Industry and Security (BIS) published a Federal Register notice modifying the list of approved end-users and eligible items for the People’s Republic of China (PRC) under Authorization Validated End-User (VEU). This final rule amends the Export Administration Regulations (EAR) to add a new entity to the list of end-users in the PRC approved to receive exports, reexports and transfers of certain items under Authorization VEU (Section 748.15 of the EAR), and adds and revises eligible items and destinations for two existing VEU authorizations. As a result of this modification, there are six VEUs approved in China and a total of twenty eligible facilities. Since October 2007, over \$19 million of high technology items have been shipped from the United States to the PRC under Authorization VEU.

“The VEU program is an important initiative that promotes secure civilian high technology trade and we are pleased to expand the program in China. We look forward to more additions to the VEU program in the coming months,” said Acting Under Secretary for Industry and Security Daniel O. Hill.

In the rule, BIS added Aviza Technology China to the list of validated end-users found in Supplement No. 7 to part 748 of the EAR. Five of Aviza Technology China’s facilities are now qualified to receive items controlled under three specific product categories without individual licenses under Authorization VEU. Additional product categories and an additional

VEU - Continued on page 10

Houston Firm Settles Export Allegations

BIS announced that B.J. Services Company, a provider of specialty products and services to the oil and gas industries, has agreed to pay an \$800,000 civil penalty to settle allegations that it exported certain butterfly and check valves in violation of the Export Administration Regulations. B.J. Services Company is headquartered in Houston, Texas.

“An effective compliance program requires continuous oversight and revision,” said Kevin Delli-Colli, the Acting Assistant Secretary of Commerce for Export Enforcement. “Failing to keep pace with changing business practices can result in numerous violations and degrade our system of export controls.”

The allegations involved 63 unlicensed exports to a variety of countries of various service parts controlled under Export Commodity Classification Number 2B350 for reasons of chemical and biological weapons proliferation, specifically, Teflon-coated valves. The violations occurred between 2003 and 2007. The company voluntarily disclosed the violations, and cooperated fully with the investigation.

Source: <http://www.bis.doc.gov>

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Denial Order Issued Barring Re-Export of Attack Boat for Iranian Military

The BIS added six parties to a Temporary Denial Order (TDO) issued to halt the re-export of a powerboat for use by the Iranian Navy.

The TDO, which named the Islamic Republic of Iran Shipping Lines (IRISL) and Tadbir Sanaat Sharif Technology Development Center (TSS), both based in Tehran, Iran, and Icarus Marine Pty. Ltd., of South Africa as Denied Persons, was issued based upon evidence that those parties were about to violate the Export Administration Regulations (EAR) by re-exporting a Bladerunner 51 powerboat, the “Bradstone Challenger,” to TSS for intended use by the Iranian Revolutionary Guard Corps (IRGC) Navy.

This Order makes the TDO applicable to six additional parties, all related to one of the Denied Persons by ownership, control, affiliation or position of responsibility. BIS added two IRISL officials, Ghasem Nabipour of Hong Kong and Iran, and Ahmad Sarkandi of Hong Kong, Iran and England, and Starry Shine International Limited of Hong Kong, as related parties to IRISL. These parties were added after BIS presented evidence that IRISL and Starry Shine, an entity co-directed by Nabipour and Sarkandi, had engaged in a pattern of evasive conduct, which included the subsequent renaming of the vessel used to transport the Bladerunner 51

Iran - Continued on page 13

DDTC Update

Directorate of Defense Trade Controls

D-Trade Important Notice to Industry

Dated April 30, 2009

On April 16th, DDTC launched the new DTrade2 application and database to provide our Directorate and Industry a more streamlined, efficient process and work flow. An issue with the External Server portion of the code prevented a number of applicants from logging on at any one time. Some delays were experienced but the issues have been identified.

Through the course of the past week we have tuned and optimized the suite of COTS supporting the external DTrade portal. During the past two business days we have been monitoring system performance and feel confident the external product is now equipped to receive all industry submissions. At this time we are asking that all submissions be made to the DTrade 2 product utilizing the appropriate DTrade 2 forms.

If you experience any issues while accessing the DTrade 2 system please contact the DDTC Helpdesk.

Reminders:

To ensure optimal performance and a better end-user experience we recommend the following

1. **Open the browser only when needed**, perform a given task, and close the browser. Do not close your browser after initiating a submit operation; leave the browser open until you receive confirmation.

- If you do not receive confirmation once you submit, please contact The DDTC Helpdesk to verify the system has received your case. Do not resubmit unless

we verify the system did not receive your case.

2. **File Size:** Do not submit single applications larger than 35 MB. If the applicant must submit an application in which the file size would exceed 35 MB, submit the <35MB application with a scanned document as an attachment stating that additional supporting documentation will be submitted via the Additional Documentation interface following the initial submission of the application.

3. **Optimize your Submissions:** To facilitate the best submission size, please utilize the following for optimizing attachments.

- Save and submit attachments in PDF format. PDF is ideal for document exchange. Not only is it a compact format, but it also stores information about its own appearance (layout, fonts, content, color, etc.) within the document itself.

- Compress image files and reduce the number of colors. Increase compression gradually (in increments of, say, 10%), until you achieve an optimal balance of compression and image quality. Unless critical to the understanding of the document, consider sending black and white versus full color documents.

- Screen Optimize PDF documents. Optimizing PDF files for the Web can significantly shrink their size and boost display speed, saving bandwidth and can be distributed more efficiently.



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4. **Use the drag and drop method vs. the Click Submit/Submit method.**

- Open the browser
- Locate the file to be submitted in your directory listing
- Highlight the file, holding the left mouse button down, drag and drop the file onto the open browser window.
- Click "submit" twice as you normally would.

DT2 Status information will be posted throughout the day.

- If during status checks you notice duplicate case numbers for the same submission, be advised DDTC will RWA the duplicates and adjudicate the first occurrence of the case. You do not need to identify the duplicates to us unless they remain in the system for greater than two business days.

- Because of the number of duplicate license submissions we have received, we have implemented an additional validation that will reject any case using the same

In Compliance....

SURVEY RESULTS:

“WHAT DOES IT MEAN TO BE ITAR COMPLIANT?”

A survey by the Staff of IIEI

In light of terrorist threats and national security concerns, the US Government and other governments continue tightening control on exports of munitions and related goods and services. In order to achieve this heightened control, those that daily are the front line of defense must equally heighten their efforts. To be safe, they must possess encyclopedic detailed up-to-date knowledge of the ITAR regulations, including control practices and policies. To ensure their employees are equipped, organizations are now attempting to measure their knowledge and proficiency in all critical areas related to the ITAR. This raises an important question: What should the knowledge level be? When has due-diligence been attained? In other words, what should it mean to be ITAR certified? This question was asked individually of a panel of industry experts. Somewhat surprising is their answers were very similar in identifying the “best practices” that should be addressed.

Before their answer is revealed, the government’s general intention of ITAR compliant needs to be established. It is:

For a company involved in the manufacture, sale or distribution of goods or services covered under the United States Munitions List (USML) or a component supplier

to goods covered under USML, the contractual stipulation or requirement of being “ITAR compliant” means that the company must be registered with the State Department’s DDTC, if required, as spelled out on DDTC’s web site <http://pmdrtc.state.gov/registration/index.html> and the company must understand and abide by the ITAR as it applies to their USML linked goods or services. The company themselves is certifying that they operate in accordance with the ITAR when they accept being a supplier to the USML prime exporter.

It was a consensus of industry experts that an individual should meet the “best practice” standard in the following manner:

1. Demonstrate current knowledge and usage of U.S. International Traffic in Arms Regulations (ITAR), concepts and processes
2. Demonstrate an in-depth practical knowledge and use of export documentation for ITAR
3. Understand fully the rules for using ITAR Exemptions
4. Possess a working knowledge of managing agreements under the ITAR
5. Know how to design audit requirements to ensure compliance is attained

6. Demonstrate an understanding of the industry’s professional code of ethics

Furthermore, these experts agree that it isn’t enough for individuals working within compliance meet this standard. To be compliant the culture of the company must reflect and support the compliance effort, this includes senior managers and workers in all parts of the business and this extends to include the supply chain of the company. To be compliant, every member must know their role in making the climate that supports their success in maintaining compliance.

We would like to hear readers views on what it means to be ITAR compliant. Send us your ideas and chances are they will be printed in this column. Send them to editor@dunlap-stone.edu.

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Voluntary Self-Disclosures

BIS encourages the submission of Voluntary Self Disclosures (VSDs) by parties who believe they may have violated the EAR. VSDs are an excellent indicator of a party's intent to comply with U.S. export control requirements and may provide BIS important information on other ongoing violations. BIS carefully reviews VSDs received from disclosing parties to determine if violations of the EAR have occurred and to determine the appropriate corrective action when violations have taken place. Most VSDs are resolved by means other than the issuance of an administrative penalty.

Of the VSDs received and resolved in Fiscal Year 2005, 97% were resolved with either a finding that no violation of the EAR had occurred (55%) or with the issuance of a warning letter (42%). Of VSDs received and resolved in Fiscal Year 2006, 100% were resolved with either a finding that no violation of the EAR had occurred (52%) or with the issuance of a warning letter (48%). In instances in which BIS

determines that the issuance of an administrative penalty is appropriate for the resolution of a VSD, BIS affords the submission of a VSD

VSDs [are a] "great weight" in assessing and mitigating the penalty...

"great weight" in assessing and mitigating the penalty. In appropriate cases, fines and other administrative penalties may be significantly reduced. Guidance regarding administrative penalties is provided in Supplement No. 1

of Section 766 of the EAR. Additional information is also available at Voluntary Self-Disclosures.

Pursuant to Part 764.5 of the EAR, the information constituting a VSD or any other correspondence pertaining to a VSD may be submitted to:

Director, Office of Export Enforcement
1401 Constitution Ave.
Room H4514
Washington, DC 20230
Tel: (202) 482-1208
Facsimile: (202) 482-5889

Source: <http://www.bis.doc.gov/complianceandenforcement/index.htm>

The First Monday in October

How many times have you or a friend taken the Licensed U.S. Customs Broker Examination? That is the question often heard around Freight Forwarder's offices, in shipping offices and in large corporations shipping departments this time of year. Why? Because it was just last month that many people took the Customs Broker Exam again, and failed again. It is not uncommon to speak to people who have taken the test as many as five times and still not passed. That is not surprising. It is a very hard test. Only 11% passed. But there is a solution.

The solution is not a quick fix to pass the exam. It isn't cramming and losing sleep for a week before the test. You've tried that and failed. It isn't self-study—you've done that too. The books and video are still on your shelf. So what is the answer? For some people, the answer is to sign up for the IIEI's Customs Broker Examination Preparation course. We offer it so that you'll hit your peak of knowledge just when it is time to take the test.

So what is so different in the way we prepare you? First, you don't do it alone. You will learn with up to fifteen other people in the online classroom with very active discussion of the topics. They struggle with the concepts the same as you. You are not alone. And our expert instructors are checking constantly to ensure that you know the answers. With our state of the art online classroom environment, you can study when it meets your busy schedule-- 24/7 so you can find a time that works with your



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Country Profile
Republic of Finland

A parliamentary republic, the Republic of Finland borders Sweden on the west, Russia on the east, and Norway on the north, while Estonia lies to its south across the Gulf of Finland. It is a member of the European Union. It has a cold, potentially sub-arctic climate, but comparatively mild because of moderating influence of the North Atlantic Current, Baltic Sea, and more than 60,000 lakes. The Finnish landscape is mostly flat with few hills, and its highest point, the Halti at 1,324 metres, is found in the extreme north of Lapland at the border between Finland and Norway.

The capital city is Helsinki. Around 5.3 million people reside in Finland, with the majority concentrated in the southern part of the country.

The population is aging. With a median age of 41.6 years, Finland is one of the oldest countries; half of voters are estimated to be over 50 years old. Like most European countries, without further reforms or much higher immigration, Finland is expected to struggle with demographics, even though macroeconomic projections are

healthier than in most other developed countries.

Finland was historically a part of Sweden and from 1809 an autonomous Grand Duchy within the Russian Empire. Finland's declaration of independence from Russia in 1917 was followed by a civil war, wars against the Soviet Union and Nazi Germany, and a period of official neutrality during the Cold War. Finland joined the United Nations in 1955, the OECD in 1969, and the European Union in 1995 and participates in the Eurozone.

Finland ranks high in many international comparisons of national performance such as the share of high-technology manufacturing, public education, health care, the rate of gross domestic product growth, and the protection of civil liberties.

Like other Nordic countries, Finland has liberalized its economy since the late 1980s. Financial and product market regulation was loosened. Some state enterprises have been privatized and there have been

Finland
at a Glance

GDP – \$281.2 billion (2008 est.)

GDP - real growth rate: 1.5% (2008 est.)

GDP - per capita (PPP): \$37,200 (2008 est.)

Inflation Rate: 4.1% (2008 est.)

Labor Force: 2.53 million (2008)

Unemployment: 6.4% (2008 est.)

Population: 5,250,275 (July 2009 est.)

Exports: \$104.3 billion f.o.b. (2008 est.)

Exports - Commodities: electrical and optical equipment, machinery, transport equipment, paper and pulp, chemicals, basic metals; timber

Exports - Markets: Germany 10.9%, Sweden 10.7%, Russia 10.3%, US 6.4%, UK 5.8%, Netherlands 5.6% (2007)

Imports: \$93.28 billion f.o.b. (2008 est.)

Import - Commodities: foodstuffs, petroleum and petroleum products, chemicals, transport equipment, iron and steel, machinery, textile yarn and fabrics, grains

Import - Partners: Germany 15.8%, Russia 14%, Sweden 13.7%, Netherlands 6.8%, China 5.5%, UK 4.9% (2007)

Foreign Exchange Rate: Euros (EUR) per US Dollar - 0.6827 (2008 est.)

Internet Users: 3.6 million (2007)

Internet Hosts: 3.877 million (2008)

Source: CIA World Fact Book



some modest tax cuts. Finland joined the European Union in 1995, and the Eurozone in 1999.

Finland has been ranked the second most stable country in the world, in a survey based on social, economic, political, and military indicators.

ITC - Continued from page 1

Alongside the need for public investments, participants emphasized the need for innovative financing mechanisms such as equity financing and venture capital. “The business environment must be conducive to attracting investments in infrastructure,” said Mr. Fernando Bosque, Managing Director of MJB Airports, Jamaica. It was also well recognized that while the hard infrastructure levels the playing field of international trade, it would be through the soft infrastructure, that enterprises attain competitiveness to trade beyond borders.

Greater complementarities between the national and regional trade support institutions were identified as the key drivers for regional integration in the Caribbean.

Strengthening trade support institutions to provide services, such as trade intelligence, compliance with SPS and quality standards, collective marketing, access to trade finance, and better product packaging, with a region-wide scope was advocated. It was felt that by pooling available resources and expertise, regions could achieve economies of scale. Small and least developed countries may not have the resources to establish trade institutions for their own key export sectors.

The need for development of sector strategies that help enterprises add value and enhance competitiveness through rationalizing supply chains, especially in the services sector, was expressed. The role of foreign direct investments in upgrading technology, improving efficiency and connecting local producers with global markets was underscored.

Efficient logistics, including through efficient ports, were considered major determinants of competi-

tiveness. “Automation is a key component of any trade facilitation effort, but it is not an end in itself. It must be a part of a broader plan that must include regulatory changes and process improvements. Inefficient, outmoded or unnecessary processes must not be automated, they must be changed or eliminated”, said Mr. Francisco Santeiro, representing FedEx.

About the ITC

The International Trade Centre (ITC) works in partnership with the following organizations at the national and regional levels; enterprises, trade-related government departments, trade and industry associations, national trade promotion agencies, chambers of commerce, commodity organizations, small enterprise development agencies, commercial banks and other trade financing institutions, standards boards, packaging institutes, management institutes for training trade managers, tender boards and central purchasing institutions, state-owned corporations, purchasing and supply management associations and regional organizations specialized in selected trade and marketing functions. ITC advocates an integrated and comprehensive approach to trade development, seeking to avoid duplication, maximizing synergy and choosing the best ideas. To this end, in addition to its parent bodies, the World Trade Organization (WTO) and the United Nations Conference on Trade and Development (UNCTAD), it cooperates with other relevant agencies inside and outside the UN system, building upon each other’s comparative advantages and “best practices”.

Source: http://www.intracen.org/AidforTrade/documents/jamaica/report_jamaica.pdf

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Broker - Continued on page 7

busy schedule. Second, we are not teaching you to be a customs broker—we are teaching you how to pass the test. We are very good at doing this—ask around. 99% of our students would recommend us to a friend. Because we do this over a six week period, so you can retain it- you are not rushed. Most importantly, you use all three learning modalities to learn the material—you read it, write it and apply it (do it). This ensures that you will not only understand it—but you will know how to apply it to passing the test. Best of all, historically we have over an 80% pass rate for our students taking and passing the test the first time.

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VEU - Continued from page 5

qualified facility were added to the existing entry for Applied Materials China, Ltd., and additional product categories were added to the entry for BHA Aerocomposites Parts Co. Ltd. Finally, as a result of a change of name, the entry for “BHA Aerocomposites Parts Co. Ltd.” was re-titled “Boeing Tianjin Composites Co. Ltd.”

BACKGROUND

In a final rule published in the *Federal Register* on June 19, 2007, BIS revised and clarified U.S. export control policy for the PRC, establishing Authorization VEU and identifying the PRC as the initial eligible destination for this authorization. BIS published the names of the first five end-users in the PRC that were approved to receive certain specified items under Authorization VEU on October 19, 2007.

Foreign companies that are approved as validated end-users are eligible to receive specified items under the general authorization “Authorization VEU” instead of under individual transaction-specific licenses. Companies in China participating in VEU must pass a rigorous national security review and agree to strict follow-on compliance obligations prior to qualification, including agreeing to on-site reviews. Qualification for VEU benefits both the foreign participants and U.S. exporters by allowing categories of exports instead of requiring review of individual transactions. The VEU program is in the national interest because it makes U.S. products more competitive for foreign companies that have a strong track record of civilian end-uses and compliance with U.S. dual-use export controls. This allows the U.S. government to focus more precisely on exports where the foreign customer is less well-known.

Source: www.bis.doc.gov/news/2009/bis_press04292009.htm

DDTC - Continued from page 5

transaction identification number. Please ensure each Transaction ID is unique.

DTrade 1 (Ellie/Robb) will continue to be available for the short term, however, we request you attempt using DTrade 2 prior to resorting to a DTrade 1 (Ellie/Robb) submission. As identified above, please verify with The DDTC helpdesk that your DTrade 2 submission was successful

prior to submission to DTrade 1 (Ellie/Robb). If you experience difficulties with a particularly sensitive case (e.g., OIF/OEF) please contact the DDTC Response Team.

Thank you very much for your patience and tolerance as we work through these issues and conducted what amounted to a “Live Test” of DTrade 2. We ask that you continue to monitor the DDTC website for future status updates and notices.

Source: <http://www.pmdtcc.state.gov/>

Volunteers Needed
 Want to be a member of IIEI’s Certification Advisors and help IIEI set industry standards?
 Visit www.industrycertification.org

Visit www.usexportcompliance.com



ALL of the top **50**
 U.S. aerospace and defense companies have enrolled employees in courses leading to industry certification.

**Munitions Dealer
 Arrested and Charged
 in Conspiracy**

WASHINGTON - An Iranian national has been arrested and charged, along with ten other defendants, with participating in a conspiracy to export U.S.-made military aircraft parts to Iran, the Justice Department announced today.

Defendant Baktash Fattahi, an Iranian national and legal U.S. resident, was arrested in California, on April 3, 2009, on charges of conspiring to export military aircraft parts to Iran. Federal agents arrested Fattahi at his apartment in Lancaster, Calif. He remains in federal custody in California and will be removed to Miami to face the charges in the Indictment.

Baktash Fattahi and ten other defendants were indicted on April 2, 2009, by a federal grand jury sitting in Miami on charges of conspiring to violate the International Emergency Economic Powers Act, the U.S. Iran Embargo, and the Arms Export Control Act for their participation in a conspiracy to export U.S.-made military aircraft parts to Iran.

Source: <http://www.pmdtcc.state.gov/>

**Long Awaited
New Compliance Course
Debuts in July**

Export Compliance Audit:
A Disciplined Approach - IIEI-330

Course Description: This advanced six-week online course examines the topic of auditing the trade compliance effort of an organization. Any organization, large or small, bound by the U.S. Government's International Traffic in Arms Regulations or Export Administration Regulations or other regulations may find the concepts and topics reviewed in this course helpful in determining its own disciplined and unique audit methods and processes. In this course, "best practices" are reviewed and case studies are examined as the student determines practical solutions to real-life organizational issues and then assembles an audit process designed to meet his or her organization's needs. As a final project, students design a Technology Control Plan using the concepts from this course.

There is no one "best practice" or one size fits all auditing process. Organizations perform audits for many reasons, use an independent auditor or may perform periodic audits using internal resources for various reasons. This course reviews the diverse options and processes that may be helpful to organizations seeking to monitor and audit their trade compliance effort.

Note: This is a law-related elective course and is intended for experienced practicing international trade compliance professionals who need to apply a disciplined

approach to designing and conducting an export compliance audit.

Prerequisites: Understanding the ITAR course (IIEI-306), Export Compliance Documentation (IIEI-311), Mastering ITAR Exemptions (IIEI-308), Agreements under the ITAR (IIEI-299) and Ethics in Trade Compliance (IIEI-320) are required prerequisite courses.

Course Credit: 3 Credit Hours

For more information, view the course description online or call an enrollment advisor at (800) 474-8013 U.S. and Canada or 1+602-648-5750 outside the U.S..

Call for Instructors

We are growing rapidly and need qualified faculty to teach courses in both Dunlap-Stone University and The International Import-Export Institute. Candidates should have a strong desire to teach others and possess a masters degree or higher or be a recognized expert in the discipline or area they seek to teach.

If interested, please contact Caulyne Barron by email at cbarron@dunlap-stone.edu

Go Green: Join the Online Learning Community!

With "Earth Day" just behind us and a growing effort to make sustainability a reality rather than just a buzz-word, many of us are looking for ways to reduce our impact on the environment and get the most out of our resources.

Students at online universities such as Dunlap-Stone are doing just that, in greater numbers every year. Online providers offer a great way to both earn a quality education and go green. First and foremost, there is a huge benefit to the environment when fewer students are commuting to physical classrooms and using up all that gas. Not only are you shrinking your carbon footprint, but you save time and gas money.



Additionally, online education delivers your materials electronically as much as possible.

Many on-ground institutions provide printed lectures and supplements that end up being thrown out. Digital delivery means you can save it for later, or delete it if you don't – without the waste of paper. Using e-books (now available for many classes) allows you to reduce your paper weight even more. And consider that our students in time zones worldwide are with you in your efforts. Going green really can make the difference.

Do You know who you're Dealing with?

Lists To Check

The Bureau of Industry and Security provides you with this list of FREE locations to verify who you are dealing with. The regulations require that you know your customer. The following lists may be relevant to your export or re-export transaction. Check them frequently before you ship.

Denied Persons List

(www.bis.doc.gov/dpl/default.shtm)

A list of individuals and entities that have been denied export privileges. Any dealings with a party on this list that would violate the terms of its denial order is prohibited.

Unverified List (www.bis.doc.gov/enforcement/unverifiedlist/unverified_parties.html)

A list of parties where BIS has been unable to verify the end-user in prior transactions. The presence of a party on this list in a transaction is a "Red Flag" that should be resolved before proceeding with the transaction.

Entity List (www.bis.doc.gov/entities/default.htm)

A list of parties whose presence in a transaction can trigger a license requirement under the Export Administration Regulations. The list specifies the license requirements that apply to each listed party. These license requirements are in addition to any license requirements imposed on the transaction by other provisions of the Export Administration Regulations.

Specially Designated Nationals

List (www.treas.gov/offices/enforcement/ofac/sdn/)

A list compiled by the Treasury Department, Office of Foreign Assets Control (OFAC). OFAC's regulations may prohibit a transac-

tion if a party on this list is involved. In addition, the Export Administration Regulations require a license for exports or reexports to any party in any entry on this list that contains any of the suffixes "SDGT", "SDT", "FTO", "IRAQ2" or "NPWMD".

Debarred List

(www.pmdtc.state.gov/compliance/debar.html)

A list compiled by the State Department of parties who are barred by §127.7 of the International Traffic in Arms Regulations (ITAR) (22 CFR §127.7)

*Know
your
customer*

from participating directly or indirectly in the export of defense articles, including technical data or in the furnishing of defense services for which a license or approval is required by the ITAR.

Nonproliferation Sanctions

(www.state.gov/t/isn/c15231.htm) Several lists compiled by the State Department of parties that have been sanctioned under various statutes. The Federal Register notice imposing sanctions on a party states the sanctions that apply to that party. Some of these sanctioned parties are subject to BIS's license application denial policy described in §744.19 of the EAR (15 CFR §744.19).

There are numerous commercial software packages and services available that will automate the process of checking all of these lists for you. They also have many other valuable features and services. Their costs vary greatly. But they do simplify the verification process of who you're dealing with. They are well worth the expense.

List Source: <http://www.bis.doc.gov/complianceand enforcement/liststocheck.htm>

BIS WEB - Continued from page 1

We are taking this action to enhance procedural transparency in the licensing process and to help exporters comply with U.S. export and reexport control laws. Please be advised that any company information posted to the webpage is for informational purposes only and does not signify any additional obligations under the EAR. BIS will not validate or be responsible for the accuracy of the classification information, and inclusion on the webpage does not denote BIS endorsement of any company, its employees, or its products or services.

CLASSIFICATION INFORMATION TABLE

(http://www.bis.doc.gov/pdf/ccats_table2.pdf)

If your company currently has, or plans to have, Commodity Classification information available on your company's website, or an export control point of contact, and you would like this information to be accessible via the BIS website, please contact:

Commodity Classifications @bis.doc.gov. In your email, provide any of the following information you would like to be posted on the BIS website:

- 1) Company name
- 2) General description of the products/services
- 3) Commodity classification information website address
- 4) Export control point of contact (may be a general telephone number or email address)

Source: www.bis.doc.gov/commodityclassificationpage.htm
Source: www.bis.doc.gov/commodityclassificationpage.htm

Creating Well-Rounded Disciplined Thinkers:

General Education Requirements

By Caulyne Barron, Vice President of Online Programs

Sometimes we're asked why students seeking a business degree need to complete DSU's general education requirements. What is the value of science or art to a student who plans to work in the international trade arena? Why not cut to the chase and just require business related topics? Because that would simply be training and not education.

Higher education has a higher purpose than to simply equip students to perform a task that leads to success in the workplace.

Dunlap-Stone University believes that students who demonstrate not only a depth of knowledge within a particular subject matter, but also a breadth of understanding across disciplines are better able to contribute meaningfully within their careers and communities. To succeed personally and professionally and to be global citizens, DSU believes individuals should demonstrate *six core competencies*. These competencies include:

1. Written Communication: Competency in written communication includes the ability to communicate effectively in written language, the ability to use a variety of modern information resources and supporting technologies, the ability to differentiate content from style of presentation, and the ability to suit content and style to the purpose of communication.

2. Scientific and Quantitative Reasoning: Competency in scientific and quantitative reasoning includes the ability to locate, identify, collect, organize, analyze and interpret data, and the ability to use mathematics and the scientific method of inquiry to make decisions, where appropriate.

3. Critical Analysis and Reasoning: Competency in critical

analysis and reasoning includes the ability to arrive at reasoned and supportable conclusions using sound research techniques, including inference, analysis and interpretation.

4. Technological Competency: Technological competency includes the ability to use computer technology and appropriate software applications to produce documentation, quantitative data presentations and functional graphical presentations appropriate to various academic and professional settings.

5. Information Literacy: Information Literacy includes the ability to identify, locate and effectively use information from various print and electronic sources.

6. Global and Cultural Perspectives Appreciation: Appreciation of global and cultural perspectives includes comparing, contrasting, examining, and integrating diverse viewpoints and maintaining an environment of inclusiveness.

General education coursework allows students to explore topics as far from contemporary management topics as Shakespeare, physical science, terrorism, representative masterpieces and mathematics. Yet, through their exploration, students often find that the process of learning, the mechanics of analysis and critical writing helps students form their world-view and improve their understanding of their business courses.

DSU awards transfer credit for a wide range of general education coursework, in accordance with the published guidelines. For those who still need additional courses to meet the general education requirements, we offer a variety of classes to reinforce the core competencies and introduce new subjects to our degree-seeking students.

Iran - Continued from page 4

powerboat to Iran. BIS also added three parties as related persons to Icarus Marine Pty. Ltd. of South Africa: Shawn Hugo de Villiers of South Africa, Gunther Migeotte of Norway and South Africa and Icarus Design, AS of Norway, based on their relationship with Icarus Marine and that entity's involvement with the re-export.

Under the Order, which is effective upon publication in the Federal Register, these six parties may not directly or indirectly participate in, or benefit in any way from, any transaction subject to the EAR for the remaining duration of the TDO expiring on July 22, 2009. It is also a violation of the EAR for any person to participate in a transaction subject to the EAR involving a Denied Person, including any of these six related persons, while the TDO is in effect.

The high-performance powerboat the subject of the TDO has U.S.-origin engines and other components, and can reportedly reach speeds of up to 65 knots. BIS has significant concerns that it will be used by the IRGC Navy as a fast attack craft. According to published reports, similar vessels have been armed with torpedoes, rocket launchers, and anti-ship missiles.

Source: <http://www.bis.doc.gov>

Fall Degree
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is approaching FAST.

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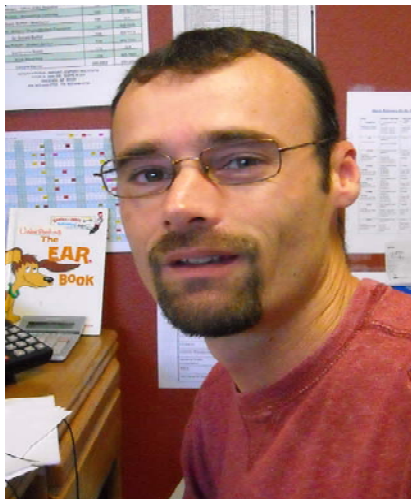
e-Books Available for Select Courses at DSU

A number of textbooks are now available as e-books on the DSU Bookstore page. You'll be linked directly to the publisher's websites to purchase these ebooks, which can literally reduce the weight of your classload by taking those heavy textbooks out of your briefcase and putting them on your laptop. Not all titles are available as e-books, but many are.

Survey for Masters of Trade Compliance Coming Soon

We have received numerous requests to develop a Masters Degree in Trade Compliance program. In order to determine its feasibility, in the next issue of GlobalWatch®, there will be a link listed for a needs survey on our web site. DSU is trying to identify the need within the industry. If it is sufficient, program development will begin. Alert your friends who might be interested that the July/August issue will include information pertaining to this survey. Thank you in advance for sharing your opinions.

Meet Brice Macartney



With DSU more than a year now, Brice is a member of our Advisor staff. And as many of you know, he focuses mainly on helping people take certification oriented courses and schedule their certification examinations. Another main task for Brice is ensuring that people are current with their CEUs. He is a Certified U.S. Export Compliance Officer® and is pursuing his Certified ITAR Professional® certification. He is also enrolled in the Bachelor degree program. Brice is a parent of two young children that take up his time outside of work.

Tuition Increases August 1, 2009

As a result of the rapidly rising costs of online credit card processing and other expenses, there will be a \$15.00 per credit hour increase in tuition of all courses effective August 1st 2009. After the increase, our school's tuition will still be in the 40th percentile of all similar colleges and universities. We pledge to keep our prices as low as possible in these stressful and challenging times.

June and July 2009 Class Start Dates

June 2009

Mastering ITAR Exemptions (IIEI-308)
Incoterms 2000 (IIEI-141)
Importing (IIEI-129)
Understanding EAR (IIEI-307)
Researching The Global Village (IIEI-404)
Ethics in Trade Compliance (IIEI-320)
Agreements Under the ITAR (IIEI-299)
Customs Broker's Exam Prep (IIEI-304)
Ethics in Import Compliance (IIEI-365)
Commerce License Exceptions (IIEI-309)

July 2009

International Economics (IIEI-450)
Importing Duties and Regulations (IIEI-140)
Documentation Global Village (IIEI-225)
Modern Management Principles (IIEI-335)
Global Culture (IIEI-401)
Purchasing Global Marketplace (IIEI-376)
Competitive Human Resource Mgmt (IIEI-445)
Business Statistics (IIEI-160)
Understanding the ITAR (IIEI-306)
Export Compliance Documentation (IIEI-311)
Intro to the Revolutionary War (IIEI-188)
Introduction to World Religions (IIEI-170)
Ethics in Trade Compliance (IIEI-320)
Understanding EAR (IIEI-307)
Customs Broker's Exam Prep (IIEI-304)
Understanding the ITAR (IIEI-306)
Global Business Plan (IIEI-405)
Canada Export Controls (IIEI-324)
Freight Forwarder Practices (IIEI-127)
Export Compliance Audit (IIEI-330)
Mastering ITAR Exemptions (IIEI-308)

Students have requested that we publish the class start dates in GlobalWatch to make it easier for them to keep track of them. As you've noticed we have added literally many dozens of courses over the past year to meet your requests. We do ask that you register early as classes as they tend to fill up quickly. Call an enrollment advisor today. at (800) 474-8013.



IEI Certifications

Congratulations to the following on successful completion and recent award of the respective certifications.

Certified U.S. Export Compliance Officer®

Poonam Arora – KS	Rita McCabe – NH
Amy Clark – VA	Loren Ornelas – WI
Kendra Cook – VA	Kirk Robbins – CO
Susan Fernandez – FL	Shelby Simpson – TX
Kenneth Galica – MA	Dr. James W. Smith – CA
Jerome Hannifin – NY	Shallyn Williams – IL
Lisa Kelly – PA	

Certified International Trade Professional®

Vincent Schwalbe – WI

Certified Exporter®

Barbara Kostakos – MD

Certified International Trade Logistics Specialist®

Hae Sung Cheon - Japan
 Kaori Nagatomo - Japan
 Megumi Masaki - Japan
 Natsua Asai - Japan
 Natsuko Tanaka - Japan
 Junko Takamizawa - Japan
 Naomi Hiratsuka - Japan

Trade Related IIEI Certifications

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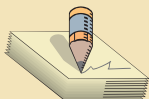
- ◆ Certified U.S. Export Compliance Officer®
- ◆ Certified ITAR Professional®
- ◆ Certified International Trade Manager®
- ◆ Certified International Trade Professional®
- ◆ Certified International Trade Specialist®
Documentation, Logistics, Marketing and Finance
- ◆ Certified International Freight Forwarder®
- ◆ Certified U.S. Import Professional®
- ◆ Certified Exporter®

Under Development

- ◆ Certified United Kingdom Export Compliance Officer®
- ◆ Certified Canadian Export Compliance Officer®
- ◆ Certified People’s Republic of China Export Compliance Officer®
- ◆ Certified Australian Export Control Officer®
- ◆ Certified International Free Trade Zone Specialist® (Middle East)

The IIEI Certification works with governments and industry experts worldwide in the development of the certifications shown here. If your government would like a trade compliance certification program, please contact us at certifications@expandglobal.com. We look forward to working with you.

Disclaimer: IIEI Certification credential testing is separate from Dunlap-Stone University and the International Import-Export Institute. Distance Education and Training Council (DETC) accreditation does not cover such certification. All courses offered by DSU/IEI that help prepare individuals for IIEI Certification testing are accredited by DETC.



Student Honor Roll

Honor - Distinction - Excellence

The students shown here have demonstrated outstanding “A” performance for two or more consecutive semesters.

Joanne Ashley - TX
 Sheik Ayube – FL
 Heather Beresford – TX
 Janna Bevins - VT
 Eric Blum - SC
 Jose Camacho - CA
 Deborah Carpenter - RI
 Blane Carroll – NC
 Brad Chatfield - AZ
 George Clark – KS
 Holly Clarke - CANADA
 Diana Courter - WA
 David Dean – IA
 Gloria Dias - AZ
 Louis Ehlers - TX
 Julie Fields - IN
 Gail Frisby - CA

Anthony Gibaldi - NY
 Robin Green - NY
 Andrea Gulacsi – PA
 Gayle Guy - CA
 Kimberly Harper – TX
 Claire Hoberecht - WA
 Cindy Hollohan – MA
 Jennifer Hopkins - VA
 Brett Johnson – AZ
 Maria Lievanos - CA
 Katie Lynch - CT
 Sivaganesh Maharajan – WA
 Lisa Maldonado - TX
 Gail Marlowe – OH
 Belinda Martin – MO
 Patrick Matsumura - UT
 Robert Mayfield – IL

Andrew McBride - NY
 Rita McCabe - NH
 Teresa Moore – WA
 David Nakama - CA
 Harry Nelson - CA
 Robert O’Connor – CA
 Laurie Phelan - CANADA
 Max Pischel - TX
 David Power - TN
 Robyne Roberts - FL
 Heidi Sankey – WI
 Shelby Simpson – TX
 Robin Steiner - OR
 Toni Stivers – CA
 Lori Sweetman – FL
 Li Tao - CA

Cynthia Teed – MD
 Kristin Thomas - WA
 Pamela Turinsky – PA
 Cynthia VanNorman – GA
 Marie Walker – CANADA
 Mary Jean Walters - AZ
 Duyen Washington – VA
 Meghan Weeks - CANADA
 Lana White - CA
 Larry Williams – SC
 Alicia Worthington - PA
 Trevor Wright - CA
 Anne Young - CA

**Congratulations
 to Everyone.
 Well done!**



The International Import-Export Institute

at Dunlap-Stone University

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Phoenix, Arizona USA 85029

Phone: (800) 474-8013 Outside U.S. (602) 648-5750

Fax: (602) 648-5755

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Dunlap-Stone University's International Import-Export Institute



Bachelor of Science in International Trade Management Program

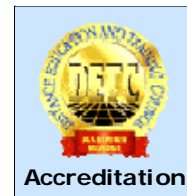
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Trade Compliance Management
General Management

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