



# Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE  
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## New EU Study shows Significant Economic Benefits from a Doha Deal

**Brussels, 31 October 2011** - A study shows that the economic benefits arising from the Doha Development Agenda (DDA) negotiations in the World Trade Organisation amount to an increase of world exports of \$359 billion on an annual basis from a deal on the liberalisation of industrial goods, agriculture, services and on the removal of red tape.

If an agreement on sectoral liberalisation of industrial goods (chemicals, machinery, electronics) could be reached, world exports would increase by a further \$146 billion, totalling \$505 billion annually, according to the study.

In terms of capturing the global benefits of the Doha Round, this timely analysis manages to grasp the complexity of the negotiating proposals currently on the table in Geneva at most detailed level, offering policy makers a thorough analytical basis for an informed decision on the importance of a successful DDA Agreement for the world economy. Key findings of the study:

- The deal on the table is well balanced. In terms of economic gains all regions – developing, emerging and developed countries - would profit from an ambitious Doha deal. This would mean 0.2% of additional economic growth at global level and an extra \$30 billion in GDP for the EU on an annual basis.

- The removal of red tape in trade, so-called trade facilitation (e.g. simplification of customs procedures, transport and trade logistics), is of major importance for a successful Doha Develop-

...removal of red tape in trade..

## China's Imports Rise Sharply, While Export Growth Slows

By SHARON LaFRANIERE - NY Times

**BEIJING** — China imports rose sharply in October while export growth continued to slow, according to data released Thursday that suggest robust domestic demand could offset the effects of weakening demand for Chinese goods in Europe and elsewhere.

The stronger-than-expected import data may also reflect inventory buildups as Chinese importers took advantage of price swings to stock up on crude oil, copper and other commodities, analysts said.

Over all, imports rose a surprising 28.7 percent, compared with levels a year ago, far surpassing an increase in September of 20.9 percent.

Export growth continued to moderate, rising 15.9 percent over levels of a

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ment deal. Almost half of the global gains (\$100 billion in world exports) are to be reaped from this part of the agreement. In addition, the allocation of gains becomes more favourable to developing countries when trade facilitation is included.

- A successful Doha agreement would not negatively affect wages of EU workers. Wages for skilled and unskilled labour would even increase by around 0.3%.

- The negotiations on sectoral agreements for chemicals, machinery and electronics goods would further enhance the DDA benefits. With these sectoral agreements world exports would increase by an additional \$146

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## Notes from the President

### We are Humbled by Your Support

by *Dr. Donald N. Burton*



Many wonderful things are happening here at Dunlap-Stone University and a few less delightful items too. This issue of GlobalWatch® reflects this diversity. The two stories on page 1 show that the world is still round and has challenges facing international trade as reflected in the EU's view of the Doha Round and China's balancing act with imports and exports.

Joe Zodi's explanation of "Routed Transactions" should be welcomed by many as he clearly explains the process. (See page 3) The surprising coordinated effort between BIS & DDTC in addressing a common problem with Category VIII (See page 4 & 5) was a crowd pleaser I noted when I attended the recent Society for International Affairs (SIA) conference in Washington DC earlier this month. It was great to see old friends and make so many new friends during my short visit there.

It was challenging to fit all the people who earned their certification in this issue of GlobalWatch®. (See listing on page 15) Our partner schools worldwide are educating more people to IIEI Certification's "One world, One

Standard" and they are able to pass their certification exams! Well done: Japan, China, Nigeria and USA schools.

As compliance measures become crucial to every function of the supply chain, we thank Preston Parker for allowing us to print his article about managing freight forwarders. (See page 9).

Everyone worldwide wants to know about the U.S. Administration's Reform of Export Controls. Based on speaker's comments at the SIA conference, it is going to be a long, slow process that may take years to unfold. For right now, realigning the USML and the CCL is going to be what happens.

Perhaps most wonderful is the increasing number of new students and the number of new companies we hear from each month who have chosen DSU and IIEI as their compliance training solution. Equally humbling is the number of new degree seeking students who have been admitted into one of our programs. My staff and I thank you for your continued strong support. Every day we try to live up to and exceed your expectations. Thank you. Be well.



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## Routed Export Transactions — Are They Safe and Easy Answers?

By  
*Joseph Zodl*

We hear of the “Routed Export Transaction” and sometimes that “as long as it is routed, you (as seller) have no responsibility for export compliance.” This sounds easy, and would work with an EXW sale and shipment. But is it what companies should accept? Should companies strive for EXW sales and solicit Routed Export Transactions (RET)?

What is the RET?

First, what is it not? It is not a situation where the seller receives routing instructions from the buyer. These are routing guides, which are very useful tools and are a frequent practice (<http://www.zodl.net/routingguides.htm> has an example).

A RET is where a foreign buyer has authorized a U.S. representative to handle the export compliance responsibilities. This could be a freight forwarder, or their U.S. office, or another company in the U.S. The foreign buyer isn't under U.S. jurisdiction, but those with a U.S. presence are, and so this is permissible under both the U.S. Export Administration Regulations (15 CFR 758.3) and the U.S. Census Regulations (15 CFR 30.3)\*. The foreign buyer is referred to as

the FPPI or “Foreign Principal Party in Interest.”

The seller has the obligation to turn various information over to the representative. Some, such as the Schedule B number, would be expected, as the seller (known as the USPPI or “U.S. Principal Party in Interest”) would be able to more accurately classify his product. Of course, the information is to always

be correct information. But there are broad requirements for the supply of information as well, such as “Any information that it (the USPPI) knows will affect the determination of license authorization” (15 CFR 30.3, 15 CFR 758.3).

Suppose we have an export that requires a license, and give the representative information that we believe is sufficient. They export the controlled articles to a controlled destination without a license. Eventually, the question to be decided in the investigation is, “did the seller supply sufficient information, or not?” We claim we did, the representative claims we didn't, and we are still in the thick of it. So we are not completely out of any responsibility solely because it was a RET.

Another question is in the authorization itself. The EAR states that the USPPI is to receive an “assumption writing” from the FPPI that the FPPI accepts export compliance responsibility and has appointed their U.S. representative to

act as exporter (15 CFR 758.3). However, there is nothing in that regulation which states that you receive a letter from the representative that says, “Yes, I am taking the responsibility.” Here, the weak link is that if later on there is an investigation of a violation, and the representative says, “We were just acting as a freight forwarder, we never took on the compliance responsibility” then it is up to you to prove that, yes, they did so as to not be held responsible. Our recommendation here is to obtain an appropriate letter from the representative specifically agreeing that it is a Routed Export Transaction, and that they are taking over the export compliance responsibility from you. That is **if** you decide this is acceptable to you and your company.

The Routed Export Transaction, then, is not truly “safe and easy” but has its pitfalls. Many sellers will do well to avoid them, and to always keep control of the export compliance steps, using their own freight forwarder.

### Footnote:

<http://www.law.cornell.edu/cfr/text> is a source for the Code of Federal Regulations (CFR).

### About the Author

Joseph Zodl is a consultant on matters related to international trade, author of a text book used widely across the U.S. now in its fifth Edition and has taught at IIEI for over eight years. He can be reached at: [eximport@zodl.net](mailto:eximport@zodl.net)

### What is a RET?



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## BIS Update

Bureau of Industry and Security

### Proposed Rule Impacts Aircraft and Related Items

The Bureau of Industry and Security, Department of Commerce has proposed a rule, revising the Export Administration Regulations (EAR): related to Control of Aircraft and Related Items the President Determines No Longer Warrant Control Under the United States Munitions List (USML)

This proposed rule describes how articles the President determines no longer warrant control under Category VIII (aircraft and related items) of the United States Munitions List (USML) would be controlled under the Commerce Control List (CCL) in new Export Control Classification Numbers (ECCNs) 9A610, 9B610, 9C610, 9D610, and 9E610. In addition, this proposed rule would control military aircraft and related items now controlled under ECCNs 9A018, 9D018 and 9E018 under new ECCNs 9A610, 9D610 and 9E610. This proposed rule also addresses license exception availability for items controlled by the five new ECCNs that would be created. This is the second in a planned series of proposed rules describing how various types of articles the President determines, as part of the Administration's Export Control Reform Initiative, no longer warrant USML control, would be controlled on the CCL and by the EAR. This proposed rule is being published in conjunction with a proposed rule of the Department of State, Directorate of Defense Trade Controls, which would amend the list of articles controlled by USML Category VIII. In addition, this proposed rule would modify aspects of the Bureau of Industry Security's (BIS) July 15, 2011 proposed rule by adding cross references to ECCNs 9A018, 9D018 and 9E018; by adding provisions re-

lating to License Exception Strategic Trade Authorization (STA) eligibility to clarify that its scope extends to the United States Government, to any person in the United States, and to the "development" or "production" of items; and by including a general policy of denial for 600 series items for destinations that are subject to a United States arms embargo under the regional stability reasons for control.

**DATES:** Comments must be received by December 22, 2011.

**ADDRESSES:** You may submit comments by any of the following methods:

- *Federal eRulemaking Portal:* <http://www.regulations.gov>. The identification number for this rulemaking is BIS-2011-0033.
- By email directly to [publiccomments@bis.doc.gov](mailto:publiccomments@bis.doc.gov). Include RIN 0694-AF36 in the subject line.
- By mail or delivery to Regulatory Policy Division, Bureau of Industry and Security, U.S. Department of Commerce, Room 2099B, 14th Street and Pennsylvania Avenue NW., Washington, DC 20230. Refer to RIN 0694-AF36.

### FOR FURTHER INFORMATION CONTACT:

Gene Christiansen, Office of National Security and Information Technology Controls, tel. (202) 482-2984, email [gene.christiansen@bis.doc.gov](mailto:gene.christiansen@bis.doc.gov).

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### Four Companies Settle Antiboycott Charges

U.S. Department of Commerce Assistant Secretary for Export Enforcement, BIS, David W. Mills announced that four companies agreed to pay a total of \$ 72,000 in civil penalties to settle allegations that each violated the antiboycott provisions of the Export Administration Regulations (EAR). The companies are: ChemGuard Inc, Bank of New York Mellon (Shanghai Branch), World Kitchen LLC, and Tollgrade Communications Inc.

### Case summaries and additional information:

- **ChemGuard Inc (CGI)**, located in Mansfield, TX, has agreed to pay a civil penalty of \$22,000 to settle seven allegations that it violated the antiboycott provisions of the EAR. The Bureau of Industry and Security (BIS), through its Office of Antiboycott Compliance (OAC), alleged that during the period 2005 through 2007, CGI, in connection with transactions involving the sale and/or transfer of goods or services (including information) from the United States to United Arab Emirates, on two occasions, furnished prohibited information in a statement regarding the blacklist status of the carrying vessel, in violation of the antiboycott provisions of the EAR and, on five occasions, failed to report to the Department of Commerce the receipt of a request to engage in a restrictive trade practice or boycott, as required by the EAR. Further information is available at: <http://efoia.bis.doc.gov/antiboycott/violations/tocantiboycott.html>

**Boycott** - Continued on page 12

**DDTC**

Directorate of Defense Trade Controls

**Update****Proposed Revision of U.S. Munitions List Category VIII**

As part of the President's Export Control Reform effort, the Department of State proposes to amend the International Traffic in Arms Regulations (ITAR) to revise Category VIII (aircraft and related articles) of the U.S. Munitions List (USML) to describe more precisely the military aircraft and related defense articles warranting control on the USML.

**DATES:** The Department of State will accept comments on this proposed rule until December 22, 2011.

**ADDRESSES:** Interested parties may submit comments within 45 days of the date of publication by one of the following methods:

- E-mail:  
*DDTCResponseTeam@state.gov* with the subject line, "ITAR Amendments—Category VIII.
- Internet: *www.regulations.gov*, search for this notice by using this rule's RIN (1400-AC96).

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**Industry Notice**

DDTC has updated its master country names and country codes list in accord with the changes in geopolitical definitions of states. The DSP Forms (DSP-5, -6, -61, -62, -73, -74, -85), the Common Batch Processing Schema, and the DS-2032 forms were also updated.

To help industry prepare, the revised versions of all affected forms are now available for download and review. For additional information including the new form version numbers and to download the forms click here.

[http://www.pmdtcc.state.gov/dtrade2\\_forms\\_110511.html](http://www.pmdtcc.state.gov/dtrade2_forms_110511.html)

**NOTE:** After the implementation date of 11/21/2011, earlier versions of these forms will no longer be accepted. (11.06.11)

**DDTC Web Notices:**

- A Final Rule has been published to amend Section 123.22 of the ITAR regarding return of expired or exhausted licenses. (11.04.11)

<http://www.pmdtcc.state.gov/FR/2011/76FR68311.pdf>

- Final Rule regarding Libya has been published. (11.04.11)

[http://www.pmdtcc.state.gov/FR/2011/Libya\\_76FR68313.pdf](http://www.pmdtcc.state.gov/FR/2011/Libya_76FR68313.pdf)

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# In Compliance....

## New Association Seeks Best Practices for Export Control Compliance “Coalition for Excellence in Export Compliance”

Washington D.C. [March 10, 2011]

- An informal group of exporting community volunteers has joined together to form the Coalition for Excellence in Export Compliance (CEEC) with the goal of helping U.S. exporters and institutions improve compliance with U.S. export controls. Conceived in the fall of 2010 by trade compliance professionals interested in sharing and improving best practices for export compliance, CEEC’s members represent a wide array of organizations including academia, federally funded research and development centers, industry, trade and professional associations and private legal practitioners and consultants.

CEEC (pronounced “seek”) is a “compliance laboratory” that arose organically from the daily efforts of its members to share their practical knowledge with one another. Through this continuing work, a common concern emerged over the existing patchwork of official and unofficial guidance on compliance with a multitude of U.S. export regulations and trade sanctions and the lack of a uniform body of agreed on standards on which to build. Our initial focus is U.S. centric and in conjunction with long-needed changes.

As a result, the CEEC organized to review and compare various existing guidelines and standards, identify consistencies and gaps, and recommend improvements that can be adopted as a new universal model for more effective trade compliance. Although CEEC’s endeavors take place against a backdrop of ongoing U.S. government initiatives to change the current U.S. export control system, effective compliance is timeless and

an obligation that is as fundamental as reform. That makes CEEC’s mission worthwhile no matter the context.

To accomplish its objectives CEEC has formed two working groups. The first, led by John Pisarelli, Legal Director for Trade Compliance at Thales USA, is focused on a comparative analysis of existing guidelines and standards. That initiative in turn fuels efforts of a second working group, led by Carol Fuchs, International Trade Regulation Counsel at the General Electric Company, to propose recommendations to harmonize those standards along with the widely recognized but now more than a decade old *Nunn-Wolfowitz Task Force Report: Industry “Best Practices” regarding Export Compliance Programs*. When appropriate we will expand our analysis and footprint globally.

The CEEC has already opened a productive dialogue with key U.S. government stakeholders in the Departments of Commerce, State and Treasury to ensure its efforts are in line with their expectations, objectives and ongoing export control reform. The response and interest have been uniformly positive and the CEEC hopes to be able to leverage this ongoing dialogue into an opportunity not only to react to change, but to help shape it.

For more information about the CEEC, its various initiatives and how you might contribute, please contact John Priecko, 703-895-1110 or [jpriecko@comcast.net](mailto:jpriecko@comcast.net).

Source: <http://www.slideshare.net/jpriecko/ceec-fact-sheet-march-3-2011>

### Disclaimer Notice Regarding the CEEC Association

The CEEC is not affiliated with the International Import-Export Institute or IIEI Certification.

The GlobalWatch® Newsletter, in service to the international trade community globally, publishes publicly available information that is relevant to its constituencies, without bias or prejudice toward any group, individuals or organization. Therefore, the publication of DSU’s International Import-Export Institute includes the CEEC unedited Press Release (at left). While in no way affiliated with any of IEI, Inc.’s companies, the CEEC, according to its press release, was formed so that its members could “independently” and fairly represent the “best practices” in trade compliance, beyond those currently available.

Both IIEI Certification and DSU’s International Import-Export Institute welcome the CEEC’s contribution toward the international discussion making more meaningful standards in trade. They plan to make their findings and suggestions available to the public on their website. ([www.ceecbestpractices.org](http://www.ceecbestpractices.org))

We all agree that standardization in practice and understanding are critical tools, and that the more people involved, the greater attention will be brought to these issues and we applaud their efforts.



This lapel pin signifies the wearer has attained IIEI Certification’s highest-level of industry recognition of proficiency over the ITAR regulations and its administration.



## Independent Quality Assured

From time to time a question arises about IIEI Certification and its relationship to Dunlap-Stone University (DSU). This is a fair and important question that has been addressed before and one that everyone who chooses to gain industry certification from IIEI Certification or obtain certification exam preparation training from DSU should know the answer. First, they are separate distinct businesses working together in support of IIEI Certification's "One World, One Standard" program. DSU is just one of IIEI Certification's strategic partner schools worldwide and it is also a sister organization. But there is more to the relationship.

Nearly seventeen years after it began, IIEI Certification is recognized in industry globally as the international trade certification authority and for its global trade standard setting best practices. Countless supporters' contributions over the years from government experts, educators, students and supporters have helped IIEI Certification establish and maintain the industry best practices and knowledge requirements that serve as the bedrock of the program. Its mission details it as a test publishing and assessment company. It does not train or educate students. It relies on colleges, universities and training organizations worldwide to prepare test-takers for its examinations, including Dunlap-Stone Uni-

versity. What gives IIEI Certification its greatest value to industry is that it is not involved directly or indirectly in the industry it serves with certification. Because it doesn't work in the industry, it doesn't gain if someone passes or fails its tests. IIEI Certification has no vested interest in the testing outcomes for its test takers. This **independence** is what the American National Standards Institute (ANSI), the ISO standard body in the U.S., requires. IIEI Certification is a member of ANSI and adheres to this policy.

Dunlap-Stone University and the other separate business entities within the parent corporation's holdings are distinct from the test publishing business just as they are distinct and separate from one another. The corporation's name is International Export Institute, Inc. It is a privately held diversified for-profit Arizona corporation in which no single shareholder owns controlling interest. Being a relatively small corporation, management of the corporation participates as needed in the various entities within its portfolio without deference.

Among those organizations who train people for IIEI Certification exams is Dunlap-Stone University, a member of the corporation's portfolio. It is a licensed and accredited postsecondary online school. As a stand-alone entity it fulfills its mission of providing accredited education and training to students worldwide, including bachelor and associate degree programs. It also offers vocational training, including examination preparation training for those wanting to prepare for one of IIEI Certification examinations or the U.S. Government's Licensed Custom Broker Examination.

IIEI Certification and Dunlap-Stone University and the other divisions of the corporation are sister divisions. As such they share cor-

porate resources when appropriate but have no operating control over each other. Each serves its own market. More than ninety-five percent of those sitting for an IIEI Certification exam in recent years either self-studied or obtained their training from a source other than Dunlap-Stone.

To someone who does not understand corporate structures, the organization may be confusing, such as the difference between organizing as a corporation or as a partnership. There are reasons for each structure type to be used. Corporations tend to be the preferred structure for multidivisional holding companies. Partnerships in their various forms tend to be preferred for single business entities when there are multiple partners owning a business. Both are legally distinct forms of business- a business cannot be both a corporation and a partnership. Corporate structures serve a purpose. The structure of IIEI Certification's and Dunlap-Stone University's parent company meets the organizational needs of its business interests. It offers and delivers the gift of certification and education to a world that welcomes and appreciates it, supporting the notion that trade between all nations and people can safely flow unimpeded, where all members of the global trade community meet the same high standards with respect to the knowledge, skill sets and ethics that enable them to confidently participate and prosper as members of the global marketplace.



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*Country Profile*

## Republic of Poland

The Republic of Poland evolved from an ancient nation that was conceived near the middle of the 10th century. It is slightly smaller than New Mexico, mostly flat plain; mountains along southern border. It has a temperate climate having cold, cloudy, moderately severe winters with frequent precipitation; mild summers with frequent showers and thundershowers.



**Warsaw**

borders: Belarus, Czech Republic, Germany, Lithuania, Russia (Kaliningrad Oblast), Slovakia, and Ukraine.

The Constitution of Poland is the supreme law in contemporary Poland, and the Polish legal system is based on the principle of civil rights, governed by the code of Civil Law.

Poland's high-income economy is considered to be one of the healthiest of the post-Communist countries and

is currently one of the fastest growing within the EU. Having a strong domestic market, low private debt, flexible currency, and not being dependent on a single export sector, Poland is the only European economy to have avoided the late-2000s recession. Since the fall of the communist gov-

ernment, Poland has steadfastly pursued a policy of liberalizing the economy and today stands out as a successful example of the transition from a centrally planned economy to a primarily market-based economy. In 2009 Poland had the highest GDP growth in the EU. As of November 2009, the Polish economy has not entered the global recession of the late 2000s nor has it even contracted.

The privatization of small and medium state-owned companies and a liberal law on establishing new firms have allowed the development of an aggressive private sector. As a consequence, consumer rights organizations have also appeared.

Although the Polish economy is currently undergoing economic development, there are many challenges ahead.



## *Poland at a Glance*

- [GDP \(purchasing power parity\):](#) \$721.3 billion (2010 est.)
- [GDP \(official exchange rate\):](#) \$468.5 billion (2010 est.)
- [GDP - real growth rate:](#) 3.8% (2010 est.)
- [GDP - per capita \(PPP\):](#) \$18,800 (2010 est.)
- [Labor force:](#) 17.66 million (2010 est.) country comparison to the world: [34](#)
- [Unemployment rate:](#) 12.1% (2010 est.)
- [Population below poverty line:](#) 17% (2003 est.)
- [Agriculture - products:](#) potatoes, fruits, vegetables, wheat; poultry, eggs, pork, dairy
- [Industries:](#) machine building, iron and steel, coal mining, chemicals, shipbuilding, food processing, glass, beverages, textiles
- [Exports:](#) \$162.3 billion (2010 est.)
- [Exports - commodities:](#) machinery and transport equipment 37.8%, intermediate manufactured goods 23.7%, miscellaneous manufactured goods 17.1%, food and live animals 7.6%
- [Exports - partners:](#) Germany 26.9%, France 7.1%, UK 6.4%, Italy 6.3%, Czech Republic 6.2%, Netherlands 4.3%, Russia 4.1% (2010)
- [Imports:](#) \$173.7 billion (2010 est.)
- [Imports - commodities:](#) machinery and transport equipment 38%, intermediate manufactured goods 21%, chemicals 15%, minerals, fuels, lubricants, and related materials 9%
- [Imports - partners:](#) Germany 29.1%, Russia 8.8%, Netherlands 6%, Italy 5.8%, China 5.6%, France 4.5%, Czech Republic 4.2% (2010)
- [Exchange rates:](#) zlotych (PLN) per US dollar - 3.0718 (2010)
- [Internet hosts:](#) 10.51 million (2010)
- [Internet users:](#) 22.452 million (2009)

**Source:** CIA World Fact Book

The most notable task on the horizon is the preparation of the economy (through continuing deep structural reforms) to allow Poland to meet the strict economic criteria for entry into the Eurozone.



## Selecting and Managing Freight Forwarders: You're In Charge *By Preston Parker*

At risk of compliance failures in their physical supply chains, many U.S. exporters and importers complain about their inability to manage freight forwarders and customs brokers effectively. But they have more ability — and responsibility — than they think.

Regulatory changes have made accurately recording and maintaining trade-related data a compliance requirement. While data input has been more or less automated, thereby minimizing paperwork and easing access to information, this “upgrade” also brings a higher visibility of errors to the regulators, increased fees and penalties, and a heavier responsibility load for the trade community. Compliance problems arise from a lack of awareness and insufficient training on requirements.

In the current economy, in which many companies are struggling to grasp regulations and keep up with requirements, there is a tendency to place the onus on freight forwarders, making them responsible for classification, reporting, accuracy, and recordkeeping. This is not a

recommended approach, especially for U.S.-based businesses.

Forwarders rely on information provided by the exporter. Though they have written authorization to represent a business, forwarders typically expect the exporter to provide accurate information. Furthermore, regulators will hold the exporter responsible, not the forwarder, if the information is incorrect. A forwarder's primary role is to arrange and manage the transportation of goods; they should not be expected to serve as a company's compliance personnel.

### CHOOSING A FREIGHT FORWARDER

You must first choose a freight forwarder before you can manage one. Even in this economy, do not let cheap rates and low logistics costs wrongly influence that choice. The old adage rings true: you get what you pay for. Selecting the best forwarder for your business is critical to smooth supply chain operations.

At the beginning of the freight forwarder selection process, it is wise to create a requirements list. The freight forwarder must have knowledge of and experience in your product, desired shipment method, and destination country. The freight forwarder's staff must be trained in U.S. Department of State and Department of Commerce (including Census Bureau) documentation, recordkeeping, reporting, and licensing requirements.

The freight forwarder must also demonstrate willingness and the capability to communicate regular status updates and problems, and maintain records on export

transactions, including the depletion of licenses in order to provide comparative internal audits.

Other important requirements are Customs-Trade Partnership Against Terrorism (C-TPAT) certification, authorization to file electronic export information and shipper export declaration (SED) and submit the shipper's reports via the U.S. Automated Export System (AES) for filing SEDs electronically, and full internal quality controls.

Depending on the business requirements, companies should keep their forwarder relationships to a manageable number. In general, you should choose no more than two or three freight forwarders, as managing multiple forwarders requires more manpower and can ultimately create more problems than it solves.

Put in place a power of attorney (POA) with each authorized forwarder, clearly defining its role and responsibilities in your supply chain. And while there are certainly times when a company must grant limited authority to other agents, this should be a rare exception — never the rule.

Your evaluation process should also include meeting with each potential forwarder's operational staff so you can gauge their capabilities. Don't let the forwarder's account representative keep you from interfacing with operational staff during the evaluation process.

### A MISSION TO MANAGE

After you have selected a forwarder, your challenge and responsibility becomes managing the service effectively. The following forwarder management activities are all critical to maintaining best-

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Forwarder - Continued from page 9

practice standards. Give them high priority.

**Establish and maintain clear communication guidelines.**

Creating and maintaining an open dialogue with your freight forwarder is vital. You should discuss and document needs and expectations up front. Provide detailed documentation to support any potential staff turnover that may occur. Hold regular conference calls or face-to-face meetings to discuss problems and identify solutions that will improve compliance and shorten timelines. Keep metrics of your shipping activity to monitor progress and problems — both yours and the forwarder's.

It is essential to have a reporting structure for any potential non-compliance issues or government inquiries relative to the transaction. This may seem like a lot of work, but your compliance department will function more smoothly, and you will have better control of your shipping activity.

**Be sure the communication process includes prior notification of shipments.** For exports, use a Shipper's Letter of Instruction or its equivalent to ensure that shipment details are communicated clearly and accurately. Many mistakes occur because a forwarder has insufficient or inaccurate shipment information.

In addition to the required logistic information, such as weights

and dimensions, export-related documents should include compliance information such as Classification, License Authorization, and AES Internal Transaction Number. For imports, require that forwarders notify you of all incoming shipments. This allows time for verifying shipment details, such as consignee and correct harmonized tariff schedule classification, and ensuring supporting documents are provided.

**Get a complete copy of the transaction.**

A common complaint from exporters and importers is that they are unable to get a copy of their shipping records. Establishing communication guidelines makes this much easier. A checklist of required documents will help ensure that the entire transaction has been received. Giving a copy of the checklist to the forwarder can help limit the number of requests.

**Audit documents after receiving them.**

The audit doesn't have to be complete, but your compliance department should establish a threshold to maintain a good compliance rating. In general, you should conduct a weekly audit for a smaller threshold and a quarterly audit for a larger threshold. If you find errors, you can correct them as soon as possible to limit potential penalties and fines. As you find and correct errors, research each occurrence so that the problem is solved for future shipments.

**Maintain strict controls on AES filings.** To avoid mistakes, it's best for the exporter to directly file AES. Mistakes are less likely to occur when you have more control over your shipment documentation; you'll also spend less time managing your forwarder.

If you opt to have the forwarder file AES, put strict controls in place. Your best defense is to outline clear Service Level Agreements. If possible, get a copy of the transaction before it is submitted. Changes to the AES record will result in a compliance alert message to the filer, meaning your shipment violates export reporting requirements. If a filer consistently receives compliance alerts, the business practices that led to them must be identified and corrected. The filer will otherwise be subject to delays, fines, and/or penalties.

**Know your responsibility in the transaction.**

Too often, companies are identified as exporter of record without their knowledge. Regardless of terms of sale, under the various U.S. export regulations, all parties remain liable for compliance.

It is essential to know your responsibility and participation in the transaction. Just because the export is Ex-Works, do not assume that you are not the U.S. Principal Party in Interest (USPPI) or the exporter of record. Often, if the goods are leaving your dock, you are involved with the AES record.

Under the Foreign Trade Statistics Regulations, the USPPI or its agent is responsible for ensuring the AES records are properly filed. The U.S. Bureau of the Census identifies what



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Forwarder - Continued from page 10

information the USPPI and forwarder must provide.

The USPPI is responsible for coordinating with the forwarder and ensuring that all records are filed and all information is accurate. Exceptions are “routed transactions,” where the forwarder acts on behalf of a party other than the USPPI. In these cases, the U.S. Bureau of the Census has defined which party is responsible for certain information.

**Make compliance your business.** You know your transactions better than anyone. A freight forwarder will never be able to effectively run your compliance program, and you cannot outsource liability. The onus is always on the exporter and importer. When a government agency comes knocking, very little blame for violations can be laid on the forwarder.

The more control you give up, the more likely you are to increase regulatory noncompliance risk. With the exception of AES, companies should control their own jurisdiction determinations, classifications (both Schedule B and HTS), license determination, license authorization, and screening.

**Qualify your own transactions.** Don't let forwarders qualify your transactions for preferential trade agreements. Often, improperly trained shipping personnel are responsible for filling out the certificates of origin. Only the

trained personnel in your company's compliance department should perform the cumbersome, detailed qualification process.

**Limit POAs, written authorization, or signed authorization granted to agents.** The more POAs and authorizations you give forwarders, the harder they are to manage. Many companies — both importers and exporters — aren't even sure how many authorizations they have granted, and therefore are unable to manage their forwarders.

Importers who have granted POAs to several customs brokers discover that shipments clear Customs without their knowledge; the freight just arrives. No import documentation is provided, making it nearly impossible to audit the transaction. Are qualified experts performing the classification? Do you audit for accuracy? Are you overpaying duty or, worse, underpaying? Do you have all the documents required for a complete transaction file?

These are just a few common problems experienced when you lose visibility into your supply chain and control over your brokers. Limiting authorizations limits errors — and, just as important, your workload.

**Keep talking.** It's important to keep your forwarder aware of new regulation enforcement and new technology development. When an open dialog is maintained, you can more readily share, plan, and act upon information. A proactive approach will limit your errors — which will limit the time you spend correcting them and reduce the likelihood of penalties and fines.

### THE COMPLIANCE DRIVER'S SEAT

None of this is to say that forwarders are free from liability;

just the opposite is true. In August 2009, after a five-year government investigation, a global freight forwarder reached a \$9-million settlement agreement with the U.S. Bureau of Industry and Security (BIS) and U.S. Department of Treasury's Office of Foreign Assets Control in a case involving hundreds of shipments to Iran, Sudan, and Syria, and a failure to adhere to government recordkeeping requirements.

BIS has published a helpful guideline on the forwarder's responsibility within any given transaction. Forwarders are still subject to criminal prosecution and penalties for violations of U.S. trade regulations, such as Export Administration Regulations and International Traffic in Arms Regulations. And, they are still responsible for knowing their customer and being aware of red flags that may appear in a transaction.

But ultimately, the importer or exporter is responsible. It's much harder to avoid an accident if you are a passenger instead of the driver. To effectively manage your freight forwarders and brokers, be the driver in your compliance department. Be an active participant in your account. Know the regulatory requirements. When you take control, the ever-changing and evolving compliance world — including freight forwarders — becomes much more manageable.

#### About the Author

Preston Parker is an Import/Export Compliance Consultant with Dell Products LP. Mr. Parker is responsible for the Dell global export management system. Prior to working with Dell, Preston worked for a large firm helping global businesses successfully identify compliance weaknesses and potential regulatory non-compliance issues.

### ITIEI Certification



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Boycott *Continued from page 4*

• **Bank of New York Mellon (Shanghai Branch) (BNYM)** has agreed to pay a civil penalty of \$30,000 to settle fifteen allegations that it violated the anti-boycott provisions of the EAR. The Bureau of Industry and Security (BIS), through its Office of Anti-boycott Compliance (OAC), alleged that during the year 2007, in connection with transactions involving the sale and/or transfer of goods or services (including information) from the United States to United Arab Emirates, BNYM (Shanghai Branch), on fifteen occasions, furnished prohibited information in a statement certifying that the goods were neither of Israeli origin nor contained Israeli materials. BNYM voluntarily disclosed the transactions to BIS. Further information is available at: <http://efoia.bis.doc.gov/antiboycott/violations/tocantiboycott.html>

• **World Kitchen LLC (WK)**, located in Greencastle, PA, has agreed to pay a civil penalty of \$10,000 to settle five allegations that it violated the antiboycott provisions of the EAR. The Bureau of Industry and Security (BIS), through its Office of Antiboycott Compliance (OAC), alleged that during the years 2006 through 2008, in connection with transactions involving the sale and/or transfer of goods or services (including information) from the United States to United Arab Emirates, WK, on five occasions, failed to report to the Department of Commerce the receipt of a request to engage in a restrictive trade practice or boycott,



## Degree Requirement:

Taking the comprehensive exams

Like many schools that require their students to pass a comprehensive examination focused on their major to graduate, Dunlap-Stone University is no different. Our accreditation body requires the school to accurately validate the learning and identity of its students. It tests knowledge through the administration of un-proctored tests or course projects at the end of every class and to validate identity we require two proctored examinations be taken by students during their program, generally shortly after they complete the associated courses. The exams can be taken at any time before graduation. Only students whose identity has been validated in this manner can graduate.

### Who are You?

Being an online university, it is vitally important the school verify that the students taking classes to obtain their degree are who they say they are. When students sit for their comprehensive exams they are required to provide photo identification as proof of identity. Thus the school has proof that the degree being conferred is in fact the person who has been taking classes.

The purpose of the exams is to verify that the person whose ID has been confirmed and who is taking the comprehensive tests is who they claim to be. Statistical analysis is used to compare the knowledge demonstrated and courses taken. Should extreme variance be noted, the identity of the student may be questioned.

as required by the EAR. Further information is available at: <http://efoia.bis.doc.gov/antiboycott/violations/tocantiboycott.html>

• **Tollgrade Communications, Inc (TCI)**, located in Cranberry Township, PA, has agreed to pay a civil penalty of \$10,000 to settle four allegations that it violated the antiboycott provisions of the EAR. The Bureau of Industry and Security (BIS), through its Office of Antiboycott Compliance (OAC), alleged that during the period 2002 through 2004, TCI, in connection with transactions involving the sale

and/or transfer of goods or services (including information) from the United States to Saudi Arabia, on three occasions, furnished prohibited information in a statement regarding TCI's business activities with or in Israel, and, on one occasion, failed to report to the Department of Commerce the receipt of a request to engage in a restrictive trade practice or boycott, as required by the EAR. TCI voluntarily disclosed the transactions to BIS. Further information is available at: <http://efoia.bis.doc.gov/antiboycott/violations/tocantiboycott.html>

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\* Certain restrictions and conditions apply. Speak with an Enrollment Advisor for complete details



# Dunlap-Stone University

Honor - Distinction - Excellence

## New Student Notice

New students entering any vocational or degree program should check with their advisor or counselor on a regular basis, not just before a class start date. Classes are added and moved based on your input, so stay in touch by email or phone to know WHAT'S HAPPENING.

## New Course Suggestions

It's that time of year again. If you have a suggestion for a new course, let us know. Email:

[info@dunlap-stone.edu](mailto:info@dunlap-stone.edu)

## Missing Grade Cards

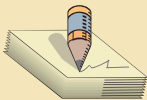
If it has been a while since you've taken a class and you just finished a class and you are wondering where your Grade Card is chances are its in your Classroom Mailbox waiting for you. Several months back we discontinued mailing them through snail mail.

## Just a Thought

Imagine how close you would be to graduation if you had submitted your transcripts from years ago and started class last January.

## Three Advantages to taking a Class During the Holidays

1. The 2 week holiday break allows you to study and get organized at your leisure
2. You get a jump start on your New Year's resolution by enrolling in a class early
3. You have an excuse of "I've got to study" in order to leave (or avoid) a dull holiday party



## Dunlap-Stone University Student Honor Roll

Honor - Distinction - Excellence

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

Sherry Aitken - FL  
Mark Argenti - MI  
Alicia Banks - VA  
Lisa Baumer - CA  
Barbie Beavers - MO  
Monica Beckman - GA  
Daniel Bejarano - TX  
Heather Beresford - TX  
Frank Beyersbergen - GA  
Christine Brekke - WI  
Patricia Brown - ME  
Charlene Cambra - CA  
Jorge Chromoy - NJ  
Galen Cloud - TX  
Carla Cook - MO  
Andrea Cortis - IN  
Glade Cunningham - OH  
Brian Dalrymple - TX  
Pamela Danisiewicz - CT  
David Dean - IA  
Janis Dorenbush - MI  
Katia Dvorak - MD  
Sherida Feazell - VA  
Ray Fischer - Canada  
Lisa Fritsch - AZ  
Maurits Gorlee - Netherlands

Kimberly Harper - TX  
Claire Hoberecht - WA  
Jan Hoffman - WI  
Joan Hornschemeier - OH  
Linda Itani - IN  
Heidi Kurek - TX  
Rashelle Lamberson - TX  
Lourdes Leon - FL  
Henry Lindon - LA  
Dana Madhu - TX  
Martin Maier - TX  
Lisa Maldonado - TX  
Belinda Martin - MO  
Robert Mayfield - IL  
Kaori McCoy - WA  
Juan Misle - FL  
Blake Moloney - AZ  
John Montgomery - TX  
Charles Murphy - TX  
Tracy Nolan - IN  
Donna Parks - MD  
Allen Patch - IA  
Justin Penman - KY  
Antonette Perez-Gutierrez - CA  
Janet Perkins - NV  
Mary Ann Peterson - CA

Dawn Phillips - NC  
Kimberly Pritula - NH  
Robyne Roberts - FL  
Amy Roche - WI  
Thomas Rudeck - UK  
Robert Rulavage - PA  
Andrew Ryan - NY  
Elizabeth Sanders - VA  
Gisela Schaefer - IL  
Beth Schroll - PA  
Debra Scott - AR  
Terri Simmons - CA  
Heather Steckel - AL  
Vincent Sullivan - CA  
Selvin Valenzuela - FL  
Christopher Vaness - CO  
Doris Van Milligan - MI  
Jody Wesley - CO  
Charlton Winston - FL  
Philip Wolf - FL  
Stephanie Wood - TX  
Harvey Wright - TX  
Yegor Yelenchak - VA  
Luda Zelikov - MA

***Congratulations to Everyone! Well done!***

EU - Doha- Continued from page 1

billion, to as much as \$505 billion annually (with yet another \$8 billion if environmental goods are included).

Contrary to a common perception, an agreement would also lead to positive effects on tariff revenue for some regions, one of which is Sub-Saharan Africa. In the case of Sub-Saharan Africa reduced red tape would make trade volumes go up even when tariffs are kept at the same level. Higher trade volumes result in an increased tariff revenue.

agreement would also lead to positive effects on tariff revenue ...

A successful completion of the DDA would even lead to gains beyond those modelled in the study. The DDA has systemic value in preventing excessive tariff hikes. Lower tariff bounds have additional value in curbing protectionism. Concluding the Doha Round reinforces fundamentally the global and transparent set of rules, which is going to make every subsequent recession less painful.

Source: <http://trade.ec.europa.eu/doclib/press/index.cfm?id=749>

China Continued from page 1

year ago. Economists said the data — the weakest in eight months — reflected continued economic turmoil in Europe.

Shipments to Europe grew 7.5 percent compared with the level of a year earlier, down from an increase of 9.8 percent in September, Barclays Capital said in a note.

Growth in exports to the United States rebounded, increasing 14 percent in October compared with the level of a year earlier, UBS Securities said in a note. Increases in exports to the United States in the previous few months had risen 10 percent to 11 percent, the investment house said.

Goldman Sachs said in a note that while exports were significantly down from the first half of the year, the data indicate “external demand has not deteriorated further” since July.

Chinese officials presented a more dire view. “What we’re facing now is a grave situation for exports and slowdown is inevitable in the third and fourth quarters,” Zhang Yansheng, director of the Institute for International Economics Research of the National Development and Reform Commission, said, according to a report by Xinhua, the state-run news agency.

## Class Start Dates

### November 2011

- TRD 325 UK Export Control Regulations
- TRD 307 Understanding the EAR
- TRD 317 Introduction to FCPA
- BUS 108 Introduction to Mathematics I
- MGT 345 Organizational Behavior
- BUS 208 Innovation and Entrepreneurship
- FAE 450 International Economics
- HAS 103 Critical Thinking Analysis
- MGT 135 Introduction to Leadership
- TRD 140 Importing Duties and Regulations
- STM 160 Statistics in Business
- TRD 311 Documentation for Export Compliance
- MGT 335 Modern Management Principles
- SCM Freight Forwarder Practices
- BUS 401 Global Culture
- SCM 412 Global Supply Chain Strategies
- BUS 440 Legal Environment of Business
- TRD 216 Trade Compliance Environment III
- TRD 308 Mastering ITAR Exemptions

### December 2011

- TRD 304 US Customs Broker Exam Prep
- TRD 307 Understanding the EAR
- TRD 320 Ethics in Trade Compliance
- TRD 257 Empowered Officials Essentials
- TRD 311 Documentation for Export Compliance
- TRD 306 Understanding the ITAR
- TRD 309 Commerce License Exceptions
- TRD 325 UK Export Control Regulations

### January 2012

- BUS-102 Introduction to Business
- BUS-111 Customer Service Basics
- BUS-113 Topics in Contemporary Business
- BUS-303 International Business Ethics
- BUS-403 International Marketing
- FAE-230 Business Accounting
- HAS-105 Writing Across the Curriculum
- SCM-125 Port Authority
- SCM-202 21st Century Logistics
- SCM-376 Purchasing in the Global Marketplace
- STM-385 Information Systems
- TRD-141 Incoterms(R) 2010
- TRD-201 Exporting/Importing Environment
- TRD-307 Understanding the EAR
- TRD-320 Ethics in Trade Compliance
- HAS-260 Terrorism in the 21st Century
- TRD-299 Agreements Under the ITAR
- TRD-311 Documentation for Export Compliance
- TRD-304 U.S. Customs Broker Exam Prep
- BUS-404 Researching the Global Village
- TRD-306 Understanding the ITAR

Course starting dates are subject to change. Contact an Advisor to confirm availability.



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 Letterio Gemelli - CA  
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 Laura Hernandez - OH  
 Kristina Keating - IL

Raschelle Lamberson - TX  
 Christain McCall - VA  
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 Dawn Phillips, Volvo Group - NC  
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