



Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE
AT DUNLAP-STONE UNIVERSITY
19820 NORTH 7TH STREET, SUITE 100, PHOENIX, ARIZONA USA 85024

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Project Management Certification

Dunlap-Stone is globally recognized for the thoroughness of its industry certification examination preparation training programs. For over 20 years, the school has helped thousands of people prepare for their trade industry certification exams and U.S. Government licensing tests. Building on this foundation, DSU has added two additional, much requested certification exam preparation regimens, Project Management Institute's (PMI) globally recognized Certified Associate in Project Management "CAPM®" and Project Management Professional "PMP®"

Over the past decades, project management has become an important skill set and knowledge base to possess and in some cases a requirement for employment. PMI's PMP® certification is "the recognized gold standard". It separates prepared job candidates from others and can be an important element of a resume.

Dunlap-Stone's newest course that helps prepare individuals for the Project Management certifications and provides the skills and knowledge to manage projects in alignment with PMI's standards is Project Management (MGT-390) See page 12.

Read more about Project Management Certifications

[Click here](#)

Small Companies Can Own Significant Niches in the Global Marketplace!

by DSU staff

When large, global companies are having a rough time of it in the global marketplace that is a signal to small entrepreneurial exporters to seize the day! Many of the reasons why large companies are having a difficult time in foreign markets are very different than for small firms. Small companies are on a different drum beat than multinationals. Small companies can run circles around the big mammoths in meeting the needs of individual consumers and small market niches everywhere. Here are some of the reasons:

Small companies can adapt and change quickly for each and every country they serve, even with sales significantly below larger firms' sales requirements. The cost for a large multinational to customize their products for a small niche market simply is too small a volume for them to even consider it. Small companies don't have major manufacturing facilities that need to produce a large volume of product.

Economies of scale is one of the big inhibitors for large companies. They produce huge quantities which require huge lag times to orchestrate in producing goods.

Large global players are generally capital intensive efforts. They need to sell into markets that can consume their large

quantity of goods they produce. Small companies don't have this concern.

Large quality dependent supply chains are inflexible distribution in the short run – slow to change to meet consumer demand in the short run.

Large companies are slow in adapting to market realities in niche markets. It is just not cost effective to attempt to serve market niches that way small companies can.

Multinationals can't serve niche markets because of low margins based on
Small Companies *Continued on page 12*

Read "Who is the Most Important Person"

Page 3

BIS: NEWS & Sanctions

Page 4

DDTC Update

Read about ECR timeline updates
Page 5

In-Compliance: "What do you Need to Know?"

Page 6

Read "Why a Classification Number is Not Enough"

Page 10

Read about Two New Courses

Page 14 & 15

See Classes Starting Soon

Page 13

See Honor roll

Page 15

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Notes from the President

Trade Compliance Center Stage

by *Dr. Donald N. Burton*



As I review each issue of GlobalWatch® I am constantly reminded of the changes occurring here and Dunlap-Stone in reaction to the changes in the world around us.

The articles on page one are a case in point. As the trade compliance industry matures there is a huge need for project management skills as taught in our new class of that name. But the real eye catcher should be the opportunities facing small companies across the world in small niche markets everywhere.

On page 3 the article investigating who is the most important person in compliance was written to cause a discussion of trade compliance within companies regarding this important subject. As usual we have included the latest sanction and fines from BIS on page 4 and on page 5 we published DDTTC Export Control Reform Dashboard so you can quickly see what is going on in the changing world of compliance.

In our In-Compliance column (on page 6) we explore what you really need to know about trade compliance. Read about CJs on page 8. Joseph Zodl's article (page 10) on why a classification number is not enough should get many people's attention.

As you can see on page 11, we keep adding more class start dates each month. I am confident that you will find what you need to learn to

meet training needs. I am particularly proud to announce two new classes: Project Management (TRD-390), (page 14) that qualifies as an elective in the Trade Law program and as an elective. The new Medical Marijuana (HCA-272), (see page 15) which is part of our healthcare program, was developed because of the need to lay out the scientific truths about cannabis for people in the healthcare industry.

Authorization requirements to become a Validated End-User (VEU) are reviewed in the article on page 14. This should be of interest to many readers.

I am always delighted to see how many people qualify to be on the Honor Roll. Check it out on page 15. Congratulations to all who made the list.

As always, thank you for your continued strong support. Be well.

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Who is the Most Important Person?

by Dr. Don Burton

According to government officials, the message should be painfully clear to all U.S. organizations that following the rules when exporting controlled goods and services is critical to any organization's survival. In this post 9/11 world, authorities say, nothing less than full compliance with U.S. export regulations will be tolerated. With that said, why then are current statistics showing compliance violations are on the rise? In principle, it is simple to maintain compliance. Ask any Chief Executive Officer (CEO). He or she will tell you a general statement about their organization's effort and how they consider compliance important. In larger organizations, such as The Boeing Company or Lockheed Martin, there are hundreds if not thousands of people directly assigned to perform trade compliance duties. In small companies, the task may fall to being an additional duty to someone, perhaps in the contracts area. Regardless of the size of the trade compliance function within an organization, or the volume of exports, it is important to identify who is the most important person in achieving trade compliance within any organization. There are several possible answers.

When you think about it, the international sales person/team or international sales manager is probably most important. The reason is simple: the sales person knows the most about the transaction and has the most to gain or lose if the sale does

not happen. Because the salesperson must know all of the attributes of the goods or services being sold, including the usage of the goods in question and each product's USML or CCL code, the sales department should flag the order as requiring an export license. Everyone within the organization from that point on just needs to do their assigned task following sales' notification—recognizing the license need/status of the order. Simple. Or is it?

In thinking a little more about it, maybe it's the international contract manager who is most important. The contract manager would simply need to identify the components requiring export licenses, flag them in the system and then everyone would follow procedures, get the licenses and ship the goods under the license. Could it be that simple?

Without question, when you consider the role of the contracts and sales departments in identifying the product or service as requiring a validated license, the physical task of obtaining the license and verifying the

details related to who is the foreign purchaser and the dozens of all key points, the export compliance professional needs to be the gatekeeper in ensuring that the shipment complies with all U.S. and other applicable country export compliance regulations. The task is important, but isn't the compliance person just checking on the proper identification and handling done by other people? Maybe then, this is not the most important person.

Just because of the name alone, it can be argued, that the organization's Empowered Official (EO) must be the most important. After all, no controlled export can be shipped without this person's signature attesting to the correctness of the shipment. It is the EO's legal responsibility to make sure that everything is done correctly—or this person can go to jail. The question that needs to be answered though is does the signature make this person most important in achieving trade compliance. The truth is simple. No. The EO, in most cases, is not the person doing any of the physical tasks related to insuring trade compliance. It is the staff beneath him or her that does the work of getting the license submitted for approval and verifying that everything is not only safe and correct, but also insures a very high degree of confidence in the security of the shipment details.

Because of the legal issues, including liability, it has been suggested that the organization's General (Legal) Counsel is most important. In real terms, it is the legal department who determines the internal governance processes that result in the organization being trade compliant. It is the legal department's due diligence effort that must defend the organization's sales and shipments internationally. When violations occur,

Person - Continued on page 12

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BIS Update NEWS and Sanctions

Denial of Export Privileges

U.S. District Court for the District of New Hampshire, Paweena Pechner, alk/a Paweena Montasood (“Pechner”), was convicted of violating Section 38 of the Arms Export Control Act (22 U.S.C. § 2778 (2012)) (“AECA”). Specifically, Pechner knowingly and willfully caused to be exported from the United States to Thailand firearms which were designated as defense articles on the United States Munitions List, without having obtained from the United States Department of State a license or written approval for the export of these defense articles. Pechner was sentenced to probation for two years, assessed a penalty of \$600, and fined \$3,000.

BIS received notice of Pechner’s conviction for violating the AECA, and has provided notice and an opportunity for Pechner to make a written submission to BIS, as provided in Section 766.25 of the Regulations. BIS received a submission from Pechner. Based upon my review and consideration of that submission, BIS decided to deny Pechner’s export privileges under the Regulations for a period of ten (10) years from the date of Pechner’s conviction

Denial of Export Privileges

On May 7, 2015, in the U.S. District Court for the Eastern District of Pennsylvania, Alexandre Astakhov (“Astakhov”), was convicted of violating Section 38 of the Arms Export Control Act (22 U.S.C. § 2778 (2012)) (“AECA”). Specifically, Astakhov knowingly and willfully attempted to export from the United States to Russia, and aided and abetted the attempted export of, defense articles, that is two L-3 CNVD-T thermal clip-on night vision devices, which were designated as a defense article on the United States Munitions List, without having first obtained from the Department of State a license for such export or written authorization for such export. Astakhov was sentenced to 39 months of imprisonment, three years of supervised release, 150 hours of community service, a criminal fine of \$2,500 and a \$200 assessment.

Based upon my review and consultations with BIS’s Office of Export Enforcement, including its Director, and the facts available to BIS, I have decided to deny Astakhov’s export privileges under the Regulations for a period of 10 years from the date of Astakhov’s conviction. I have also decided to revoke all licenses issued pursuant to the Act or Regulations in which Astakhov had an interest at the time of her conviction

Arrest Of Chinese National For Illegally Attempting To Export High-Grade Carbon Fiber To China

The United States Attorney for the Southern District of New York, announced the arrest of FUYI SUN, a/k/a “Frank,” a citizen of the People’s Republic of China (“China”), in connection with a scheme to illegally export to China, without a license, high-grade carbon fiber that is used primarily in aerospace and military applications.

SUN was arrested after traveling to New York to meet with undercover agents (“UCs”) in an effort to obtain the specialized fiber, which – due to its military and aerospace applications – requires an export license for export to China.

The Complaint charges SUN, age 52, in three counts: Count One charges attempt to violate the International Emergency Economic Powers Act (“IEEPA”); Count Two

Carbon Fiber Continued on page 9

Major Export Enforcement Case Summaries

can be viewed at:

www.pmdtc.state.gov/compliance/documents/OngoingExportCaseFactSheet.pdf

Click link for Document

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DDTC **Update**
 Directorate of Defense Trade Controls

To see Dashboard at DDTC, click link:
<http://pmdtcc.state.gov/ECR/index.html>

USML Category		Key Milestones		Federal Register	
No.	Description	Effective Date	Transition End Date	Final Rule	Correction Rule
I	Firearms	TBD	TBD	TBD	TBD
II	Artillery	TBD	TBD	TBD	TBD
III	Ammunition	TBD	TBD	TBD	TBD
IV	Launch Vehicles, Guided Missiles, Ballistic Missiles, Rockets, Torpedoes, Bombs, and Mines	7/1/2014	6/30/2016	79 FR 34	79 FR 36393
V	Explosives and Energetic Materials, Propellants, Incendiary Agents, and Their Constituents	7/1/2014	6/30/2016	79 FR 34	79 FR 36393
VI	Surface Vessels of War and Special Naval Equipment	1/6/2014	1/5/2016	78 FR 40922	79 FR 26
VII	Ground Vehicles	1/6/2014	1/5/2016	78 FR 40922	79 FR 26
VIII	Aircraft and Related Articles	10/15/2013	10/14/2015	78 FR 22740	78 FR 61750
IX	Military Training Equipment	7/1/2014	6/30/2016	79 FR 34	79 FR 36393
X	Personal Protective Equipment	7/1/2014	6/30/2016	79 FR 34	79 FR 36393
XI	Military Electronics	12/30/2014	12/29/2016	79 FR 37536	79 FR 77884
XII	Fire Control/Sensors/Night Vision	TBD	TBD	TBD	TBD
XIII	Materials and Miscellaneous Articles	1/6/2014	1/5/2016	78 FR 40922	79 FR 26
XIV	Toxicological Agents	TBD	TBD	TBD	TBD
XV	Spacecraft and Related Articles	11/10/2014	11/9/2016	79 FR 27180	79 FR 66608
XVI	Nuclear Weapons Related Articles	7/1/2014	6/30/2016	79 FR 34	79 FR 36393
XVII	Classified Articles, Technical Data, and Defense Services	10/15/2013	10/14/2015	78 FR 22740	78 FR 61750
XVIII	Directed Energy Weapons	TBD	TBD	TBD	TBD
XIX	Gas Turbine Engines and Associated Equipment	10/15/2013	10/14/2015	78 FR 22740	78 FR 61750
XX	Submersible Vessels and Related Articles	1/6/2014	1/5/2016	78 FR 40922	79 FR 26
XXI	Articles, Technical Data, and Defense Services Otherwise Not Enumerated	10/15/2013	10/14/2015	78 FR 22740	78 FR 61750

Compliance from DDTC

To ensure compliance with U.S. export law and regulations, the Directorate of Defense Trade Controls strongly advises that registered exporters and manufacturers have in place programs that assist in monitoring defense trade activities.

These programs should include a manual that articulates the company's policy on and commitment to compliance with defense trade laws and regulations, and that outlines the procedures for dealing with licensing and compliance matters. Such a manual should also include

the identification and duties of empowered and responsible persons, and procedures on record keeping and internal auditing.

To assist you, DDTC has outlined some elements (Click source link) that we believe should

be included in your compliance program:

Questions? Please call the DDTC Response Team at (202) 663-1282.

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



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Discover why training to become a Certified U.S. Export Compliance Officer® is important to all U.S. aerospace & defense contractors and their trade compliance personnel.

In Compliance....

Trade Compliance Education and Training - What Do You Need to Know?

By Dr. Donald Burton

When attending or speaking at events, I often get asked what trade compliance education and/or training should someone take. Our office staff here at Dunlap-Stone University (DSU) frequently get the same question. Of the training offered: internal, external, computer based, face-to-face, one-day seminars/workshops, two-day conferences, shorter WebEx or Webinars, conference calls..., or fully accredited college courses on-ground or online, which is better?

The answer is simple. It depends. They all have pros and cons. The best advice is to take the ones that meet your and your organization's specialized needs! Each mode has different value. The two-day seminar is great because it gets you out of the office, mingling with other compliance types as you focus on timely relevant issues. If you make an extra effort, the networking at these events is as valuable as the event itself. In all cases, the information presented should be accurate, current, and complete. Don't be afraid to be selective about where

you spend valuable and usually limited education and training dollars. If you are not careful, you can expend a lot of money and end up with poorly presented, incorrect or out-of-date information.

One-day seminars and workshops are also good because they allow you to better focus on a limited number of issues and not get "overloaded." Web-based activities are convenient and are a wonderful way to "listen in and ask questions" as experts present their views on topics. Full length college courses are outstanding because they cover the topics in greater detail. Every delivery method or mode is valuable, but no one approach alone can do the job. Computer based or online activities by themselves are not sufficient. A combination of these modes with an appropriate level of initial and recurring face-to-face education and on-going training are essential to maximize communication and knowledge retention.

One downside to attending conferences is information overload. This often happens to people new to trade compliance. By the afternoon of the first day, you can see the glazed look

in their eyes. And by the end of the second day newcomers look like deer in the headlights. An enormous amount of material is presented in a constant stream at these events. Newcomers tend to leave such events with their head spinning.

One-day seminars and training sessions also bring incredible value. They tend to provide knowledge on the hot topics in industry, but in an amount that people can handle. The downside is the challenge of trav-

Compliance Continued on page 7



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Classes Now Enrolling

Compliance *Continued from page 6*

eling great distances for a single day event. Many organizations don't see value of having you away from the office for a total of three or four days for just one day of training.

US Department of Commerce (DOC) Bureau of Industry and Security (BIS) regional one-day training sessions covering the Export Administration Regulations (EAR) are superb. They generally are aimed at the person new to compliance, but also have more in-depth sessions as well. Travel is limited because these events are held around the country to best serve their constituency. They are generally smaller in size and offer more one-on-one guidance. The downside is if you have a complex problem you wish to discuss, the expertise of the trainers may not be sufficient to be of assistance to you. They may have to refer you to someone else. Note the BIS is generally very responsive. They actually answer their phones and return phone calls.

There are several questions you need to ask yourself. The first is what do you want out of the training? Do you simply want to brush up on the latest changes to the regulations? Or do you need general awareness or a detailed discussion on a specific issue? Or do you need to learn the regulations from the ground up? Each venue has a specific purpose. Remember too, due diligence in selecting which events you attend is essential to get the best bang for your buck. Always look for seasoned professionals who really do know what they're talking about. Check with your peers and counterparts and find out what events have proven themselves over time

and are worthy of your time and effort to attend.

Another question is how much support does your organization give to education and training? If your organization has a history of sending people to a two-day conference once each year or only performing in-house training then you should be very selective in which sessions you attend. Some two-day events focus primarily on the US Department of State (DOS) International Traffic in Arms Regulations (ITAR). Unlike like the DOC, the DOS Directorate of Defense Trade Controls (DDTC) does not provide their own conferences, seminars and workshops. The DDTC relies on other organizations to fill that gap.

However, if you need broader more comprehensive State, Commerce, Customs and Border Protection education and training, your best bet is a conference [that](#) provides a wide-variety of breakout sessions covering a full range of trade and related topics (i.e. imports, exports, customs, supply chain...). Again, choose the events that best fit your and your organization's expanding global trade compliance needs. You can see a listing of providers approved by the IIEI Certification at their [web site](#) at www.industrycertification.org and select "Providers."

If you want to thoroughly learn the regulations, the only way to really do that is by immersing yourself in the topic over time. That is the distinct value of the longer and more concentrated online and on-ground courses that range from six to fourteen weeks, depending on the source. At many colleges, if they offer courses preparing people to

sit for the Licensed U.S. Customs Broker examination, courses range from eleven to fourteen weeks. DSU has a full range of general and narrow topic online six-week courses to fit your unique training and educational needs.

Specifically, if you want to learn the regulations in depth, whether it is the EAR or ITAR, DSU has a course to meet your need. DSU's online 24/7 format makes it easy for a busy professional to find the time to complete the training. The fact that there are others in the online classes with you allows you to build a strong network of like minded professionals that lasts long after the courses end. If you're up to the challenge, DSU curriculum prepares individuals to sit for various industry certifications, which can be valuable career enhancement and increase your knowledge and credibility in our demanding and regulatory driven global marketplace. Earning the coveted Certified U.S. Export Compliance Officer® designation helps differentiate you from other less prepared individuals.

What is the downside to taking Internet-based, in-depth courses? Most people think it's the "online" aspect that is going to be the problem. It does take a little time to get used to the electronic classroom environment, but in truth that isn't the sticking point. Like most things, to get real value from any of the DSU's courses you MUST do the work.

The classes are set up so that you get real life scenarios and problems that require time and effort on your part to study and learn so that you have complete mastery of the content. Some people aren't up to the task. They want it easy with little or no effort. Unfortunately, learning this

Compliance *Continued on page 8*

Compliance *Continued from page 7*

kind of content is never passive. It requires time, active participation and hard work. Because of the sharing mindset of classmates and DSU's focus on sharing lessons learned, even the most confusing and confounding parts of the regulations become clear as practitioners help practitioners understand based on real-world hands-on experience.

Further, because the learning is spread over six weeks, the retention rate is very high—over 80% three months later as compared to less than 10% over the same period for material learned in a two-day seminar. At one year, the retention remains high (60-70% for DSU's courses as compared to less than 5% from two-day seminars). When you study a topic over time, you are able to internalize the material.

Because of the way DSU's online courses are built, all three learning modalities are used. Some people learn by reading, others by hearing and still others by doing. The learning outcomes for all DSU courses are reinforced this way. The tremendous success rate is easy to understand. However, if someone wants it easy and does not want to learn, DSU courses won't help. To learn students must expend the required level of effort.

I recommend trade professionals do all of the above in the proper balance. Each modality has its advantages and disadvantages. No one type is the best solution. The challenge is to find the right combination that best fits you and your organization. Taking the time and making a proper determination is well worth your effort.

**Guidance on Reexports/
Transfers (in-country) of U.S.-
Origin Items or Non-U.S.-made
Items Subject to the Export
Administration Regulations**

Updated on 30 October 2015

If you are outside the United States and wish to reexport or transfer (in-country) an item (commodity, technology, or software) that is of U.S.-origin or that is subject to the Export Administration Regulations (EAR) (as described in more detail in Parts B-D below), your product may require a license or other authorization from the U.S. Department of Commerce's Bureau of Industry and Security (BIS). Certain additional restrictions are also outlined in part G below.

Determining whether your item is subject to the EAR.

Your item is subject to the EAR if it:

1. Was produced in the United States
2. Is a non-U.S.-made product that contains more than a specified percentage of controlled U.S.-origin content
3. Is a non-U.S.-made product based on certain U.S.-origin technology or software and is intended for export (from abroad) to specified destinations or
4. Was made by a plant or major component of a plant located outside the United States, and if that plant or major component of a plant is the direct product of certain U.S. technology or software, and your product is intended for export (from abroad) to specified destinations.

To read the complete BIS article on making a determination go to:

<https://www.bis.doc.gov/index.php/licensing/reexports-and-offshore-transactions>

**What is a Commodity
Jurisdiction (CJ) request**

and when & how do I submit one?

The Arms Export Control Act (22 U.S.C. 2778(a) and 2794(7)) provides that the President shall designate the articles and services deemed to be defense articles and defense services. State Department administers this process under 22 CFR 120.3 and 120.4. The Departments of Commerce, Defense, and others participate in the process.

A commodity jurisdiction (CJ) request is used to determine whether an item or service is subject to the export licensing authority of the Department of Commerce or the Department of State, Directorate of Defense Trade Controls (DDTC). Bureau of Industry and Security (BIS) is the licensing agency for exports subject to the Export Administration Regulations (EAR), while DDTC licenses defense articles and services covered by the U.S. Munitions List (USML), subject to the International Traffic Arms Regulations (ITAR). The commodity jurisdiction procedure is used if doubt exists as to whether an article is covered by the U.S. Munitions List. It may also be used for consideration of a redesignation of an article or service currently covered by the U.S. Munitions List. A CJ determination will only identify the proper licensing authority for an item, and is not a license or approval to export.

CJ requests are processed by DDTC under procedures established by that office (see 22CFR 120.3 and 120.4). For specific filing procedures, contact DDTC at (202) 663-1282 or access further information clicking on the link below. Effective September 2, 2010, all CJ requests must be submitted electronically using the DS-4076 CJ Request Form. Paper submissions will be Returned without action (RWA). The DS-4076 form and additional filing information can be accessed at the following link:

Source: http://www.pmdtc.state.gov/commodity_jurisdiction/index.html

Carbon fiber *Continued from page 4*

charges conspiracy to violate IEEPA; and Count Three charges attempt to smuggle goods from the United States. Counts One and Two each carry a maximum sentence of 20 years in prison. Count Three carries a maximum sentence of 10 years in prison. The maximum potential sentences in this case are prescribed by Congress and are provided here for informational purposes only, as any sentencing of the defendant will be determined by the judge.

Since approximately 2011, SUN has attempted to acquire extremely high-grade carbon fiber, including Toray type M60JB-3000-50B carbon fiber (“M60 Carbon Fiber”). M60 Carbon Fiber has applications in aerospace technologies, unmanned aerial vehicles (commonly known as “drones”) and other government defense applications. Accordingly, M60 Carbon Fiber is strictly controlled – including that it requires a license for export to China – for nuclear non-proliferation and anti-terrorism reasons.

Among other such measures, at one point, SUN instructed the undercover agents to use the term “banana” instead of “carbon fiber” in their communications. Soon thereafter he inquired about purchasing 450 kilograms of “banana” for more than \$62,000. In order to avoid detection, SUN also suggested removing the identifying barcodes for the M60 Carbon Fiber, prior to transshipment, and further suggested that they identify the M60 Carbon Fiber as “acrylic fiber” in customs documents.

On or about April 11, 2016, SUN traveled from China to New York for the purpose of purchasing M60 Carbon Fiber from the UC Company. SUN claimed to have personally worked in the Chinese missile program. And SUN asserted that he



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maintained a close relationship with the Chinese military, had a sophisticated understanding of the Chinese military’s need for carbon fiber, and suggested that he would be supplying the M60 Carbon Fiber to the Chinese military or to institutions closely associated with it.

On or about April 12, 2016, SUN agreed to purchase two cases of M60 Carbon Fiber from the UC

Company. SUN paid the undercover agents \$23,000 in cash for the carbon fiber. He also paid an additional \$2,000 to the undercover agents as compensation for the risk he believed they were taking to illegally export the carbon fiber to China without a license.

Source: <https://www.justice.gov/usao-sdny/pr/manhattan-us-attorney-announces-arrest-chinese-national-illegally-attempting-export>

Why a Classification Number Isn't Enough

by Joseph Zodi

U.S. exporters and importers are asked for numbers: HTSUSA, Schedule B and ECCN classifications, and in some cases, ITAR classifications (without a number). What are they used for? Is it sufficient to say, "input this, we know it's the right classification number" and think we're done? Does that mean we are in compliance?

The HTSUSA (Harmonized Tariff Schedule of the United States) is the classification system used for imports. This goes beyond identifying the type of article and obtaining correct duty rates. It is also a way of determining if the article is under quota and whether it qualifies for a particular program, such as NAFTA, or not. Supplying the correct HTSUSA to compute duties at the time of customs clearance isn't enough. We need to use the correct HTSUSA classification as a tool in planning imports far in advance. At a minimum, if we don't know our correct classification well in advance, we can't figure our costs. It's possible we will start on a venture where our costs will be higher than our planned selling price.

The Schedule B is an export system, based on the HTSUSA, which is used for declaring outbound exports. Some say that the HTSUSA number can be used for exports but that isn't always true and sometimes results in a misclassification.

It's always important to note that the Schedule B does not exist outside the United States, and that the complete HTS classifications are determined country-by-country. So while some classification num-

ber may be the same, many will be different from one country to another. As one of the best examples, the United States uses a standard of 10-digits and Mexico stops at 8-digits. If we routinely exchange classification data across borders with consistent errors, there can be confusion, delays, fines, and penalties.

What about the ECCN (Export Commodity Classification Number)? These are in the EAR (Export Administration Regulations) and are used to identify articles for export controls. Is having the correct ECCN classification number enough? No. An example is ECCN 1B003 (which covers some tools and dies). These articles are not under a specific restriction for Germany, but generally need a license which covers some telecommunications components. An article could be freely exported to Germany, but would require an export license for Israel. (But if we dig deeper on this ECCN, we will find that there is an exception for 1B003 to Israel if our shipment of this article doesn't exceed USD 5,000 in value, and another exception that permits us to proceed with a value of any amount). If we are using the information properly, we could promise to export tomorrow morning to Israel while our competitor is saying, "We will have to apply for an export license and wait for a decision." That alone gives us a competitive advantage. So here, too, the ECCN classification number is just the beginning.

What about the ITAR (International Traffic in Arms Regulations)? Here we don't have classification numbers, but we have the USML (United States Munitions List

(classification group numbers)), with hundreds of articles under restrictions because of classification as controlled defense articles. You don't sell tanks or battleships? (Maybe you do.) But many chemicals are restricted as well, and even some SCUBA equipment (but not all) and some cameras (but not all). If we find our article on the USML we may find it very easy to ship to Canada, but impossible to ship legally to China. Here, too, we find exemptions in some situations, but they will apply to some articles on the USML, not all. So knowing if our article is a USML article (and which group) or not is just the beginning. Knowing it precisely and accurately and being able to know what (if anything) we can do with it on an export is something we need to study in advance as part of our planning. Knowing when and where we can ship a USML item to is equally im-

Number Continued on page 11



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HTSUSA	import classification	U.S. Customs and Border Protection (within the Department of Homeland Security) (published by U.S. International Trade Commission)	https://usitc.gov/tata/hts/index.htm	TRD 321
Schedule B	export classification	U.S. Bureau of the Census (within the Department of Commerce)	https://www.census.gov/foreign-trade/schedules/b/index.html	TRD 321
ECCN	export classification	U.S. Bureau of Industry and Security (within the Department of Commerce)	http://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl	TRD 307
USML	export classification	Directorate of Defense Trade Controls (within the Department of State)	http://www.pmdtcc.state.gov/regulations_laws/itar.html	TRD 306
USMIL	Import classification	U.S. Department of Justice, Bureau of Alcohol, Tobacco, Firearms, and Explosives	http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr;rgn=div5;view=ext;node=27%3A3.0.1.2.2;idno=27;sid=f4e4c0fd4d94e9106565233ee81c773a;cc=ecfr	TRD-340

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Number Continued from page 10

portant. What about if an item is found on the USMIL (US Munitions Import List) from Treasury? Knowing what classification is just the starting point if you are classifying a part as there are exemptions allowed by Treasury in certain circumstances, just like under the ITAR.

Is knowing the right classification or classification number enough? It is important to have it right, but it is only the beginning of "getting it right" and the time to do our research is early in the planning stages. Knowing the classification of a part or item does not ensure compliance; knowing the complete regulations surrounding the item being classified is the only sure way to prevent violations.

Author

Joseph A. Zodi, MBA, LCB, CUSECO,
Author of: **Export- Import: Everything You and Your Company Need to Know to Compete in World Markets**

Small Companies:*Continued from page 1*

high volume sales that is the basis of their success. Small exporters don't have the overhead large multinationals have. Small companies can quickly change to market conditions.

Foreign economy woes—large buyers and distributors are impacted by global economic effects that impact nations. Their sources of supply are global and that can impact their profit margins as exchange rates can vary overnight. Small companies, who aren't able to access debt markets the same as larges as a means to bring products to market, have to rely upon guerrilla warfare to serve customers. Their sources of supply tend to be domestic and therefore not as volatile. Small companies do "rifle shot" marketing into foreign markets; large companies do blanket marketing in hopes of creating a need for the high volume they produce. Small companies have limited production and don't rely on debt and therefore don't have the debt servicing woes of multinationals. Once multinationals have set into motion a product campaign for entry into a foreign market the expense is huge. If the market positional disappears, which can be the case in these fickle times, the loss is huge. Small companies face different risks as they must start out small in markets, risking little. Small companies get good at testing the waters in foreign markets.

In today's world, large global companies with the need for high volume of sales to justify entering markets are at a disadvantage. Added to that, attempting to enter new markets that require adapting their existing mass produced products put them at a further disadvantage. Because of these facts they will never threaten the small

Person - Continued from page 3

without question, the General Counsel is critically important. But does this make him or her most important?

Ultimately, as we all know, the CEO of any organization is responsible for everything in the organization. Therefore, he or she must be most important in the compliance effort. This appears to have real merit in selecting him or her, doesn't it?

The Chairman of the Board and the Board of Directors are the "watch dogs" in setting the standards and maintaining discipline as the organization attempts to achieve its mission. If they do their assigned job, the resources—people and funding—of the organization will be allocated to achieve trade compliance. Maybe they do have the most important role.

Okay. So who is really the most important person in achieving trade compliance? It isn't the compliance department as many of you might guess—even though it is their full time job. Or is it possibly something else? Could it be the "culture of compliance" within the overall organization that is most important? The culture I am speaking about requires more than occasional lip service from management and a general statement from the CEO, Chief Financial Officer (CFO) and Board of Directors. The Sarbanes-Oxley Act of 2002 (SOX) requires executive management to have full knowledge

exporting company that has mastered the art of guerrilla marketing.

With modern logistics and communication, small companies are in position to seize small niche markets and become the market leader as they grow. In this time of hunger for many multinationals, small companies all over the world can enter markets and reap premium rewards for their efforts.

of the internal controls and therefore compliance procedures within the organization. The SEC has been given the mandate to manage compliance with SOX and uses the Committee of Sponsoring Organization of the Treadway Commission (COSO) (www.coso.org) as the authoritative source. One of the elements of the COSO recommendation establishes "organization culture" as a key ingredient to minimize the risk associated with internal control, including compliance failures. Management must actively be involved on a daily basis in fostering and supporting and defending an organization wide compliant culture and environment. For an organization to be compliant, compliance must permeate the entire organization and its supply chain. Every step along the way from order placement to inventory management and to shipping, compliance must be paramount. It must be made everyone's concern. Everyone must know their role and be an active part of compliance.

It is foolish to think, as some companies do, that an organization can assign one department (such as the compliance department) to be solely responsible for trade compliance. Other departments must be involved. If sales does not see their job as policing compliance—just sales—export violations will happen. Contracts definitely feel their plate is already full—just getting the contract signed and managed. Most Board members don't have any experience worrying about trade compliance—it is too new of a problem, one they never had to deal with before. To all these groups, compliance is someone else's problem. Everyone must share ownership of trade compliance.

Every organization needs to raise trade compliance to the senior staff level, making the topic part of all

Person - Continued on page 14

Classes Starting Soon

May 2016

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 TRD-505 Export Fundamentals
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 TRD-532 Foreign Compliance Regimens
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 TRD-129 Introduction to Importing
 TRD-323 Australia: Export Controls
 TRD-326 UK: Bribery Act of 2010
 TRD-320 Ethics in Trade Compliance
 BUS-102 Introduction to Business
 BUS-111 Customer Service Basics
 BUS-113 Topics in Contemporary Business
 BUS-303 International Business Ethics
 FAE-263 Principles of Microeconomics
 FAE-302 Global Finance Methods
 HAS-103 Critical Thinking and Analysis
 HAS-132 Introduction to Psychology
 SCM-125 Port Authority
 SCM-127 Freight Forwarder Practices
 TRD-307 Understanding the EAR
 TRD-201 Exporting/Importing Environment
 TRD-299 Agreements Under the ITAR
 SCM-202 21st Century Logistics
 SCM-379 Warehousing Practices and Principles
 TRD-141 Introduction to Incoterms
 TRD-143 Introduction to CTPAT
 TRD-306 Understanding the ITAR
 TRD-308 Mastering ITAR Exemptions

June 2016

TRD-317 Intro to the Foreign Corrupt Practices Act
 TRD-320 Ethics in Trade Compliance
 TRD-525 Auditing & Assessing Trade Compliance
 TRD-311 Documentation for Export Compliance
 BUS-404 Researching the Global Village
 TRD-350 People's Republic of China Export Controls
 BUS-204 Innovation and Entrepreneurship
 HAS-170 Introduction to World Religions
 TRD-307 Understanding the EAR
 TRD-214 Trade Compliance Environment 1
 TRD-304 US Customs Broker Exam Prep
 TRD-320 Ethics in Trade Compliance
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 MGT-335 Modern Management Principles
 MGT-402 Global Strategic Management
 MGT-445 Competitive Human Resource Management
 SCM-376 Purchasing in the Global Marketplace
 STM-106 Computing Essentials
 STM-160 Statistics in Business
 TRD-140 Importing Duties and Regulations
 TRD-143 Introduction to CTPAT
 TRD-225 Documentation for the Global Village
 TRD-306 Understanding the ITAR
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 TRD-260 Encryption Controls
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 TRD-309 Commerce License Exceptions
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COURSE LEARNING OBJECTIVES

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In this six week, three-credit hour course you learn about the evolving medical marijuana industry from the perspective of jobs and careers. Explore the challenges and myths surrounding the phenomena that is changing the landscape of medicine in the U.S. and the world.

Contact your enrollment advisor for start dates and details.

See course description by clicking this link:

Source:
<http://www.dunlap-stone.edu/courses/hca-172/>

Person - Continued from page 10

worker's lexicon. Until everyone in the organization sees compliance as part of their daily job, it won't happen. Everyone is a stakeholder. No one single person will or can be most important in achieving trade compliance. It takes everyone working together with the full undying active support of the CEO. With everyone in the organization actively pulling together, and the CEO leading the way, providing the resources to make it happen, maybe your organization can make it on the cover of Newsweek as the "Person of the Year" rather than as BIS or DDTC's current violation poster child. You decide.

Validated End-User Program

Authorization as a Validated End-User (VEU) reduces the licensing burden on industry by allowing U.S. exporters to ship designated items to pre-approved entities under a general authorization instead of under multiple individual export licenses.

Being approved for VEU status enables entities in VEU-approved countries to receive U.S.-controlled products and technologies more easily, quickly, and reliably.

Validated End-Users:

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porter may immediately ship that item under Authorization VEU instead of having to apply for an individual validated license.

Have more certainty and reliability regarding the receipt of items subject to the EAR that are included in their VEU authorizations. If an item is included in an entity's VEU authorization, there is no uncertainty about whether a license application will be approved because individual licenses are not required for the shipment of pre-approved eligible items to Validated End-Users.

Please see specific information on the Validated End-User program at <http://www.bis.doc.gov/index.php/licensing/validated-end-user-program>:

NEW NEW

**Medical Marijuana Course Announced
HCA-272**

In this course students develop a basic understanding of medical marijuana (MU), the history of cannabis for medical use, both past and present, explore various cannabis strains’ medical applicability, the possible administration methods in treating medical conditions with MU and discuss current issues surrounding medical cannabis’ expanded use in the health care industry.

This field of medical marijuana is undergoing rapid change as more studies are conducted and the research results are published. The course is intended to

present an unbiased, scientific view of the current use of medical cannabis and its properties in medicine. As new research becomes known, the university will make an attempt to keep this course current with the advances being made. With so much change happening there will always be recent findings not included in this course.

Prerequisite: HCA-172 or waiver based on current knowledge

Course Credit: 3 semester credit hours

Class Length: Six weeks

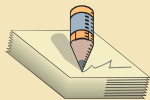
HCA-272 is a great elective course for any bachelor degree program

LEARNING OBJECTIVES

This course will

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For more information and class start dates call **(800) 474-8013**



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