

CLIENT ALERT

DOD Scales Back Proposed Export Control Compliance Clauses

August 18, 2006

On August 14, 2006, after nearly a year of evaluating 145 separate comments, the DAR Council republished a revised proposed rule intended to ensure greater government and contractor sensitivity to export compliance (71 Fed. Reg. 46434). While the DAR Council removed the "overly prescriptive" aspects of the prior proposal that would have dictated a one-size fits all approach to export compliance programs and recognized that "fundamental research" contracts need special coverage, work remains (comments are due October 13, 2006) before industry is likely to be comfortable that the proposed regulations and clauses are practical and effective.

For more information, please contact the professional(s) listed below, or your regular Crowell & Moring contact.

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