

CLIENT ALERT

It's July In Washington So Lets Publish Some Export Control Regulations

July 12, 2005

In response to recent IG criticism, DOD published a proposed rule today that would impose a contractual duty to have an effective compliance program, including distinct badging of "foreign nationals" and "foreign persons," even though only the latter category is restricted by export control laws and regulations (comments due by September 12, 2005).

Also in today's Federal Register, the State Department has promised to process applications for unclassified defense articles, technical data and services to the United Kingdom and Australia "expeditiously" (an apparent acknowledgement that State cannot extend a country exemption - similar to the Canadian Exemption - to these allies), but the only actual commitment is to limit review of such license applications to State and DOD.

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

Alan W. H. Gourley

Partner – Washington, D.C.

Phone: +1.202.624.2561

Email: agourley@crowell.com