

## CLIENT ALERT

### Reform Initiative Becomes Reality

**Apr.16.2013**

Today, the U.S. Departments of State and Commerce simultaneously published final rules to take effect in 180 days representing the initial step in completing the first phase of the Export Control Initiative: the creation of a brighter line between the U.S. Munitions List (USML) and the Commerce Control List (CCL). These rules include a uniform, but controversial, definition of "specially designed," a revised version of Category VIII (Aircraft & Related Articles) and the associated new Category XIX (Gas Turbine Engines & Associated Equipment), the unchanged Categories XVII (Classified Articles Not Otherwise Enumerated) and XXI (Defense Articles Not Otherwise Enumerated), and a licensing transition plan for those items moving from the USML to the CCL.

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

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