

exportsInternational

Agreements
TAA / MLA / Levels of DoD Maintenance
When do you need...

Submit via "Vehicle DSP-5"

- D-Trade has no way to submit a TAA, so they "hijacked" the DSP-5 form
- The "Vehicle DSP-5" is completely remapped, so actual labels on the form are virtually meaningless.
- Must use a comparable provided link to fill in the DSP-5

Licensing Contract Employees

- Under a TAA, etc., see Agreement Guidelines § 3.9
- Not under an Agreement, just center column applies
- These rules were just recently clarified
 - Basically, "contract employees" are treated as "employees"

Licensing Scenarios for Contract Employees under TAA/MLA

| | Employee DSP-5 Required? | Amount TAA/MLA? |
|---|--------------------------|-----------------|
| Via a Foreign Staffing Firm | No | Yes |
| Via a US-Person Staffing Firm | Yes | No |
| Other job, or the US Staffing Firm is DDTC-registered | No | No |

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State Dept Licensing: D-Trade 3

DDTC License Processing Times

Processing numbers include all case types except Commodity Jurisdictions (CJs), Government Jurisdictions (GJs), and Electronic Rejections

| Month and Year | Dec 2009 | Jan 2009 | Feb 2009 | Mar 2009 | Apr 2009 | May 2009 | Jun 2009 | Jul 2009 | Aug 2009 | Sep 2009 | Oct 2009 | Nov 2009 | Dec 2009 |
|-----------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|----------|
| Cases Received | | | | | | | | | | | | | |
| Cases Closed | | | | | | | | | | | | | |
| Cases Open at End of Month | | | | | | | | | | | | | |
| Average Processing Time (in days) | | | | | | | | | | | | | |

D-Trade 2 Login and Filing

Alternative Login Method: Start from www.ddtc.state.gov

Managing User Roles

The Super-User / Empowered Official controls all digital certificates and "access roles" from this interface

Assign roles by clicking on a role, and then push the left or right direction buttons

EXPORT COMPLIANCE TRAINING

Exports International no longer conducts open seminars. Our experience is that such an approach must remain too generic to be truly useful to client companies. Teaching to the "lowest-common denominator" of necessity means that too-little attention is paid to a company's actual export compliance situation.

We have found that the most beneficial approach is to conduct such training *in-situ* at our clients' own facilities. In this way, the presentations can be tailored to specific company concerns, briefing materials can be adjusted as needed, and discussions can organically "drill down" to the level of detail that is responsive to the real problems that real companies encounter.

It is also more economical for our clients because all appropriate employees and management can attend the various training modules.

This brochure is intended in part to give a sense of the slide presentations we use as one of the tools to effect comprehensive initial export compliance training.

CUSTOMIZED INTRANET SITE

See itar.us/sample for a basic version

Recurring or annual employee training, required for compliant firms, is best handled with tools that include an Intranet-based system of training resources and automated testing. So says the *Nunn-Wolfowitz Task Force Report: Industry "Best Practices" regarding Export Compliance Programs*, as well as guidelines promulgated by State/DDTC and Commerce/BIS.

We couldn't agree more. Our training, audits and Compliance Manuals all follow those models.

Our guiding principle is that compliance practices, like the quality practices of ISO-9000, work best when they are not dependent on a single personage, but rather are comprehensively thought-out, reduced to written guidelines, published under the authority of top management, checklist driven, and implemented with closed management-authority feedback loops that are strictly designed and enforced to short-circuit inadvertent disclosures or unlicensed exports – *before* they occur. It requires modern *process* control.

This is the difference between depending on the wisdom of a single "guru" to personally prevent each violation, versus embedding export compliance into the very DNA of a company.

And *that* is the philosophy that underlies how we train our clients.

MANY OTHER MODULES

exportsInternational

Introduction: How NOT to do Export Compliance

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Room With A View: DDTC Perspective

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SNAP-R
Filing for License or CCATS

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DSP-5
How to Prepare It

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DSP-5
How to Amend It

exportsInternational

Recordkeeping

exportsInternational

Export Violations
"VD" and other unpleasant acronyms