

EXPORT COMPLIANCE PROGRAMS

Why Have an Export Compliance Program?

U.S. OEMs expect this, and this in turn reflects expectations held by State/DDTC. And this makes sense, since export violations committed by teammates can rebound to the disfavor of the U.S. prime contractor involved.

Lack of an effective compliance program is virtually guaranteed to cause program delays, since many licensing or related activities come with substantial lead time, stretching into months.

Fines and penalties can be substantial, and an export debarment can put you out of business.

What is involved?

After the fashion of ISO9001, good export compliance reduces to a set of formal written policies & procedures intended to make compliance fail-safe:

- Facilities and physical plant security
- Product classification
- IT - Technology/Tech-Data
- Training - Initial and recurrent training for all employees.
- Human Resources
- Forms/checklists governing all company export-related functions, from Business Development to Shipping & Receiving
- Post-approval management of licenses, agreements, exemptions & exceptions; required and best-practices for records retention.

UAV EXPERTISE + EXPORT COMPLIANCE

Exports International USA, LLC was started in 2005 by Hugh Schmittle, who also has long experience with UAVs:

- **Deep familiarity with UAV design.** Designed or configured a variety of air vehicles including UAVs. Received a dozen utility patents for aircraft, including one shared with famed aircraft designer Burt Rutan. His aircraft employing the freewing concept have won numerous of national awards, including:
 - The 1993 *Discover Award for Technological Innovation* in the category of aviation and aerospace.
 - The 1994 Grand Prize for Excellence in Design by Design News magazine
 - The 1996 R&D 100 Award from Research & Development Magazine
- **Facility with UAV airspace integration issues.** Served as a member of the Policy IPT of Access 5, a government/industry group working to gain routine "file & fly" access to the National Airspace System by UAVs; served on the working group to define a FAR-based classification system for UAVs; rewrote part of the Federal Aviation Regulations (FAR Part 23) to accommodate UAVs.
- **Export-compliance expertise.** Heading up Exports International USA, LLC since 2005, have secured some 1,000 licenses, including DSP-5, DSP-61, DSP-73, TAA, MLA and various Commerce licenses and OFAC approvals. During 5 years in the Pentagon in Navy FMS special programs, had cognizant and action-level duties on export licenses, and participated in a rewrite of the ITAR (*i.e.* wrote CNO Plans/Policy Division's input).

EXPORT-COMPLIANCE SERVICES

- Export Compliance Program Development and Implementation
- General Training – U.S. Export Regulations – ITAR, EAR, OFAC
- Export Control Reform - major rewriting of the ITAR & EAR - how this impacts your business
- Customized Export Compliance Manual
- Customized Intranet Site – Training and Testing for Employees
- Classification of Products and Services – ITAR/EAR
- Foreign-origin and *de minimis* impacts on export classifications hardware, software, services
- Hardware Licensing – ITAR and EAR
- Technology, Tech Data, Deemed Export Licensing
- Defense Services – TAAs
- Foreign Employee Licensing – ITAR and EAR
- Schedule B lookup
- Advisory opinions & other special dispensations
- Voluntary Disclosures and Voluntary Self Disclosures
- Audits – Preventive and Directed

Contact us to see how can Exports International can help you.

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