



Professional Association of Exporters and Importers

“Leaders and Partners in Worldwide Regulatory Compliance”

July 2006

Volume 20, Number 3

BIS Publishes Proposed China Catch-All Licensing Rule

By George R. Tuttle, III

On July 6, 2006, the Bureau of Industry and Security (BIS) issued its proposed amendments to the EAR, and the licensing requirements and licensing review policy on exports and re-exports of goods and technology to the People’s Republic of China (PRC). See *Federal Register*, July 6, 2006 (Volume 71, Number 129), Pages 38313-38321. The comment period remains open until November 3, 2006.

The proposed amendments implement a new control based on knowledge of a military end-use on exports to the PRC of certain CCL items that otherwise do not require a license to the PRC. The items subject to this license requirement would be set forth in a list (Supplement 2 to Part 744). The rule also proposes to revise the licensing review policy for items controlled for reasons of chemical and biological proliferation, nuclear nonproliferation, and missile technology to the PRC, as well.

New License Requirements For Certain Items Intended for PRC Military End-Uses

The proposed rule would implement a new control on exports to the PRC of certain CCL items that otherwise do not require a license to the PRC when the exporter has knowledge, as defined in section 772.1 of the EAR, that such items are destined for military end-use in the PRC or is informed that such items are destined for such an end-use.

The rule would apply not just to exporters or re-exporters of U.S. origin goods, but to U.S. persons that support an export, re-export, or transfer that does not have a license required by Sec. 744.21. “Support” is defined to include financing, transportation, and freight forwarding, by which a person facilitates an export, re-export, or transfer without being the actual exporter or re-exporter.

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P.A.E.I. NEWSLETTER

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The rule proposes to define “military end-use” as: incorporation into, or use for the production, design, development, maintenance, operation, installation, or deployment, repair, overhaul, or refurbishing of items on the U.S. Munitions List (USML), the International Munitions List (IML) (as set out on the Wassenaar Arrangement), or listed under ECCNs ending in “A018” on the CCL in Supplement No. 1 to Part 774, EAR.

This new controls would be set forth in new section 744.21 of the EAR (Restrictions on Certain Military End-uses in the People’s Republic of China (PRC)), and the items subject to these new controls are listed in a new Supplement to Part 744 (Supplement No. 2 to Part 744--List of Items Subject to the Military End-Use License Requirement of Section 744.21). Under proposed section 744.21, you may not export, re-export, or transfer any item listed in Supplement No. 2 to Part 744 to the PRC without a license or under a license exception if, at the time of the export, re-export, or transfer, you know that the item is intended, entirely or in part, for a “military end-use” in the PRC; or you have been informed by BIS that the item is or may be intended, for a “military end-use” in the PRC. Just some of the items listed on New Supplement No. 2 to Part 744 include:

- (i) 3A292 Oscilloscopes and transient recorders other than those controlled by 3A002.a.5, and specially designed components therefor;
- (ii) 3B991 Equipment not controlled by 3B001 for the manufacture of electronic components and materials, and specially designed components and accessories therefor;
- (iii) 3B992 Equipment not controlled by 3B002 for the inspection or testing of electronic components and materials, and specially designed components and accessories therefor;

- (iv) 4A994 Limited to computers not controlled by 4A003, with an Adjusted Peak Performance (“APP”) exceeding 0.1 Weighted TeraFLOPS (WT);
- (v) 5A991 Limited to items controlled by 5A991.a, 5A991.b.5, 5A991.b.7. and 5A991.f;
- (vi) 5A992 Equipment not controlled by 5A002, except mass market encryption commodities and software described in Sec. Sec. 742.15(b)(1)(i) and 742.15 (b)(2); certain “short-range wireless” commodities and software described in Sec. 742.15(b)(3)(ii); and commodities and software with limited cryptographic functionality described in Sec. 742.15(b)(3)(iii); and
- (vii) 6A995 “Lasers”, not controlled by 6A005 or 6A205.

Also included on Supplement 2 are software and technology related to the above items.

New Authorization Validated End-User (VEU)

To facilitate legitimate exports to civilian end-users, BIS proposes a new authorization for validated end-users in section 748.15 of the EAR. This proposed authorization would allow the export, re-export, and transfer of eligible items to specified end-users in an eligible destination, including the PRC. These validated end-users would be those who meet a number of criteria, including a demonstrated record of engaging only in civil end-use activities and not contributing to the proliferation of weapons of mass destruction or otherwise engaged in activity contrary to U.S. national security or foreign policy interests.

A list of validated end-users, respective eligible items, and eligible destinations would be published

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in proposed Supplement No. 7 to Part 748 (Supplement No. 7 to Part 748--Authorization Validated End-User (VEU): List of Validated End-Users, Respective Eligible Items and Eligible Destinations). By applying for status as a VEU, PRC companies would be able to satisfy the need of U.S. companies that they are not engaged in activities that would prohibit them from receiving goods and technology without a license.

Exporters, re-exporters and end-users who use authorization VEU would be required to comply with recordkeeping and reporting requirements, as described in proposed sections 748.15(e) (Certification and recordkeeping) and (f) (Reporting and auditing requirements).

Revised End-User Certificate Requirements

Finally, this rule proposes to amend sections 748.9 and 748.10, and require exporters to obtain an End-User Certificate issued by the PRC Ministry of Commerce for all items that require a license to the PRC for any reason and exceed a total value of \$5,000. (Consistent with the existing Regulations, BIS will continue to require End-User Certificates for all computer exports to the PRC that require license applications, regardless of the dollar value of the export.) Currently, the PRC End-Use Certificate applies only to items controlled for national security reasons.

The rule also proposes to eliminate the current requirement that exporters submit PRC End-User Certificates to BIS with their license applications. Instead, this rule would require exporters to include the serial number of the PRC End-User Certificate in an appropriate field of the license application, and to retain the PRC End-User Certificate for five years.

If you have any questions with regard to this article, please do not hesitate to contact George R. Tuttle, III at (415) 288-0428 or geo@tuttlelaw.com.

Dual Use Items:

Civilian Products, Military Applications

By Tansie Iwafuchi, PAEI Director

On May 17, 2006, the Professional Association of Exporters and Importers hosted a seminar called "Dual Use Items: Civilian Products, Military Applications" and facilities were provided by National Semiconductor of Santa Clara, California.

This industry outreach seminar was the first of its kind. Mr. Toli Welihozky, Deputy Director of the Office of International Regimes and Agreements, was instrumental in bringing a team of specialists to explain to industry how their civilian products might be used in military applications. Mr. Welihozky explained the NNSA role in export controls and went into detail about "catch-all" controls. Dr. Christopher Allen, Professor of Electrical Engineering at the University of Kansas gave a fantastic presentation on digital signal processing and Mr. Kirk Walker of Honeywell Federal Manufacturing gave an overview of commodity classification as well as MEMS Technology, wireless sensor networks, and building weapons of mass destruction.

The presentations from this highly informative seminar can be accessed at:

[NNSA Role in Export Control](#)
by Mr. Toli Welihozky

[Overview of Commodity Classification](#)
by Mr. Kirk D. Walker

[Catch-All Controls](#)
by Mr. Toli Welihozky

[Digital Signal Processing](#)
by Dr. Christopher Allen

[MEMS Technology & Wireless Sensor Networks](#)
by Mr. Kirk D. Walker

[Building Weapons of Mass Destruction](#)
by Mr. Kirk D. Walker

C-TPAT Mandatory Deadline for C-TPAT Security Link Portal is Extended

By Jo-Anne Daniels, PAEI Director

Customs & Border Protection (CBP) announced that the mandatory submission of the C-TPAT supply chain security profile data utilizing the C-TPAT Security Link Portal has been extended from July 1, 2006 until October 1, 2006. The C-TPAT Security Link Portal became operational June 1, 2006.

CBP advised that the portal will significantly enhance and improve processing and communication for all C-TPAT participants and certified C-TPAT members. Furthermore, CBP advises that C-TPAT Link Portal will result in CBP receiving greater consistent and detailed security information from the participants in the C-TPAT program. However, participants have reported having portal access issues and CBP is addressing these portal programming and access issues, and decided to extend the deadline for all enrollment sectors.

As of July 3, 2006 CBP informed CBP participants that no further extensions will be granted beyond the Oct 1 deadline and reminded members that those participants who fail to provide their security profiles to CBP may be denied membership and risk losing all C-TPAT program benefits.

For those companies who are participants, but have not yet received their portal password access, you can contact CBP. The company should e-mail CBP at industry.partnership@dhs.gov, and give its C-TPAT point of contact's name, position, physical address, e-mail and phone number and also e-mail or fax a letter on company letterhead and request point of contact designation and a password. If you do not receive a response, you can call the C-TPAT Duty Officer at 202 344-1180 and request a password. Companies who are ready to become participants should complete the C-TPAT on-line application which consists of the company profile information and the C-TPAT Agreement to Voluntarily Participate. Upon submission, CBP will grant a temporary password which

will allow the company to access the Security Link Portal. For more information on the initial C-TPAT application see CBP link:

http://www.customs.ustreas.gov/xp/cgov/import/commercial_enforcement/ctpat/online_app.

This article was prepared by Jo-Anne Daniels, President of Trade Resources & Associates, in El Granada, CA.

She can be reached at tra3332003@yahoo.com or at 650-726-6764, or <http://www.trade-resources.com/>

Silicon Valley Center for International Trade Development



Trade Mission to Brazil on Renewable Biofuels: September 16th - 23rd 2006

Join Global California and SV CITD on an exclusive trade mission to Brazil to explore renewable biofuel energy opportunities in ethanol, biodiesel, and hydrogen.

The group will travel to Brazil in September to participate in tours to the main ethanol, hydrogen and biodiesel plants, research labs and farms.

Join us to gather information, learn the chain process from plants to fuel, and discuss potential opportunities, joint ventures with small and large firms in the renewable energy sector in Brazil.

For more details, and an event flyer please visit: <http://www.svcitd.org/>

Contact: Margarise Correa at 800-769-6034 or margarise@globalcalifornia.org or citd@svcitd.org.

Export License Conditions

by Tansie Iwafuchi, PAEI Director

Believe it or not, the hard part about obtaining an export license isn't the time and energy it takes to fill out the SNAP application. Nor is it the time needed to collect all of the necessary documents such as work authorizations, data sheets, lists of ECCN's that will be used, company locations and addresses, etc.

The hard part isn't the follow up either. Calling the Export Assistance Center multiple times to make sure my documents have been received and that our items aren't being held without action, etc. is simple also. Re-sending our documents multiple times can be an exercise in patience, but it's not difficult.

The hard work comes in deciphering those export license conditions. Are the conditions on our license going to allow me to transfer the technology to my foreign national? Will I need a degree in electrical engineering just to understand the conditions? Will the customer accept the terms requested by the government?

Here are some of the more interesting license conditions that have recently appeared on export licenses for companies in the Silicon Valley:

"Applicant is authorized to release technical data to the foreign national limited to the need for use in the design of radio frequency integrated circuits at the international technology roadmap for semiconductors 90nm technology node (corresponding to a gate length in resist of 90nm and a gate length after etch of 27 nm.)" The same license said that the foreign national working on this was limited to work on .13 microns.

Three engineers interpreted this paragraph for the compliance manager:

- 1) **Can you tell me if the technology nodes and the gates in this paragraph agree?**

Engineer A: Yes, basic guidelines think these are limit tolerances just for 90nm silicon processes.

Engineer B: Node == I have no idea, I think it is a mistake. Gate == gate length of the device (transistor) They don't agree to me.

Engineer C: Technology node 90nm means that the minimum gate length is 90nm (namely 0.09u). After etch this is less than 90nm (perhaps 80nm or so).

- 2) **Would there be a corresponding micron thickness? The same license said that the person working on this was limited to work on .13 microns.**

Engineer A: Don't know, haven't looked at it in a long time.

Engineer B: 1000nm = 1um, 0.13um = 130nm. Therefore the statement above sounds like a relaxation of the restrictions. 90nm represents a more advanced technology than 130nm.

Engineer C: 90nm = 0.09 u (i.e. 0.09 micron) and that's gate length, not thickness.

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3) Do you know what an international technology roadmap for semiconductors' is?

Engineer A: I think this is managed by SIA, Silicon Industry Association

Engineer B: I think international was supposed to read national.

Engineer C: The international road-map for semiconductors is essentially a plan for standardizing the technology nodes, set by the "Semiconductor Industry Association" (or SIA, in short; <http://www.sia-online.org/home.cfm>).

Who is a technology-challenged export manager to believe? Back to the drawing board!

Another set of conditions issued within the last 6 months read:

"...After the first shipment is made against this license, send one copy of your shipper's export declaration and bill of lading or airway bill to the Department of Commerce. Indicate the license number on each document."

The use of the Automated Shipper's Export System (AES) has made documents like the "Shipper's Export Declaration" (SED) more scarce than chocolate entrusted to my two-year-olds. Clearly a company using AES would need to ask that this condition be changed/amended prior to using or accepting the export license.

Yet a third license condition has really created controversy. The exporter of the product is asked to safeguard and report on the use of the product sent to the ultimate consignee in the foreign country (!)

As paraphrased from a recent license rider:

"Annually the exporter will be required to detail the

supply chain of the ultimate consignee, including the frequency of production schedule forecasts, and track the movement of parts from ultimate consignee's receipt through production and shipping using an industry standard data tracking system. Require that products be safeguarded in a special security area at the ultimate consignee's facility, to be inspected by the exporter, and that immediate computerized updates as well as daily physical checks be used to verify the quantity of components in the area."

So what company wishes to volunteer an employee to go to India and help supervise the use of their products on a customer's line? Which customer will let their supplier do this? Also, a smaller exporter would need to make special arrangements to travel and supervise all production of items made at a factory. A larger exporter with an in-country facility might be able to more easily comply with this condition than a smaller exporter. This could be a deal killer if this condition isn't changed/amended prior to using or accepting the export license.

In my opinion, standardizing the riders and conditions for export licenses and having the regulatory agencies coordinate their conditions is something technology exporters need to urge their governmental advisory and lobbying committees to look at.

PAEI Members Share Your Insights!

The P.A.E.I. Newsletter is a publication that is written by its many members. If you have an article you have written, or have any web site that you would like to share with your fellow PAEI members in the next newsletter, please contact:

Dan Kromat at dan.kromat@ksicorp.com or

Peter Miller at peterjmiller@comcast.net

Upcoming P.A.E.I./BIS

Events Mark Your Calendars!

- **September 28 - 29, 2006**
“Complying with U.S. Export Controls”
- **January 17 - 18, 2007**
“Complying with U.S. Export Controls”
- **May 23 - 24, 2007**
“Complying with U.S. Export Controls”
- **September 26 - 27, 2007**
“Complying with U.S. Export Controls”

PAEI Events Coming Soon!

- **September 28, 2006**
“Networking Event”
(more details available soon)
- **Export commodity Control Number (ECCN) Focus on Categories 3,4,5 Workshops.**

Tentative dates will be:

- Category 3 (Oct/Nov. 2006)
- Category 4 (Jan./Feb. 2007)
- Category 5 (Feb./Mar. 2007)

PAEI is always interested in offering the education that our members need. If you want to suggest a topic for a future course, please contact one of the PAEI Board Members.

Watch the PAEI Web site for these and other events, <http://www.paei.org>

PAEI Members Get Involved!

PAEI is a member-driven organization, run by many volunteers. There are numerous projects currently in the works, and lots of new Committees forming. Announcements will be sent out periodically listing the current positions that need to be filled. If you find a position or project you are interested in, we would love to have your help.

Getting involved in a Volunteer position with PAEI is a great way to meet other professionals in the international trade fields, support the organization, and be rewarded for your efforts.

For specific information about any aspect of PAEI, please contact one of the PAEI Board members at khebertdms@aol.com or leave a message at the PAEI message line - 408-532-7234.

Ask the Experts...

Do you have an interesting Customs or Export question that you would like answered?

Please e-mail your questions to Karen Hebert at khebertdms@aol.com and the PAEI Board will try to have all questions answered in the next newsletter.



The Bureau of Industry and Security

and

The Professional Association of Exporters and Importers

are proud to offer:

“Complying with U.S. Export Controls”

September 28 - 29, 2006

8:30 A.M. - 4:30 P.M.

at the

Biltmore Hotel and Suites

2151 Laurelwood Road

Santa Clara, CA 95054

(408) 988-8411

This two-day Export Regulations Course is led by the professional counseling staff of BIS, and provides an in-depth examination of the Export Administration Regulations (EAR). The program will cover the information exporters need to know to comply with U.S. export control requirements on commercial goods. Presenters also conduct a number of in-depth, “hands-on” exercises that help prepare attendees to apply the regulations in their own companies.

The seminar will focus on:

- The scope of the EAR
- Steps to take to determine the export licensing requirements for your item
- When you can export or reexport without applying for a license
- How to determine your export control classification number (ECCN)
- Export clearance procedures and record keeping requirements
- Introduction to the concept of an Export Management System (EMS)
- Real life examples will be presented applying this information.

This program is well suited for those who need a comprehensive understanding of their compliance obligations under the regulations. All seminar-training materials will be furnished.

MCLE Credit: The Western Regional Office of the Department of Commerce, Bureau of Industry and Security is a State Bar of California approved MCLE provider. The amount of credit varies with the length of the seminar. However, 0 hours will apply to legal ethics/ law practice management; prevention, detection and treatment of substance abuse and emotional distress; and elimination of bias.

Note: Americans with Disabilities Act: If special arrangements are required for a disabled individual to attend this program, please notify the contact person at least one week prior to the program.

Dates: September 28 - 29, 2006

Time: 7:30 am Registration

8:30 am - 4:30 pm Program

Location: Biltmore Hotel and Suites, 2151 Laurelwood Road, Santa Clara, CA 95054

Please make your reservations directly with the Biltmore Hotel and Suites by calling (408) 988-8411. Please mention "PAEI" to obtain a discounted rate of \$109 for the Garden rooms and \$129 for the Tower Suites. Hotel Website:

<http://www.hotelbiltmore.com/>

Cost: \$295.00 (Cost includes continental breakfast, lunch, breaks, and all training materials)

Registration: Please no telephone or fax reservations. Advanced registration is required for this Seminar, as space is limited.

You may register for this course and pay by credit card in a secure environment on the PAEI Web site at <http://www.paei.org> (We accept VISA, AMX, or MasterCard) Registrations will be accepted online until Thursday, September 21, 2006, or until registration is filled. No refunds for cancellations made after Wednesday, September 20, 2006. A confirmation email will be sent to all paid registrants to verify that their registration is complete. If registering for someone else, please provide all contact information for actual attendee.

-or- Send your check postmarked no later than September 13, 2006 – made payable to: PAEI, P.O. Box 612743 San Jose, CA. 95161-2743. PAEI Tax ID#680117035
(Please include a copy of this flyer with your check)

Questions: For more information on the details of the program, please call BIS at (949) 660- 0144, or (408) 351-3378. For questions on registrations, please call Karen Hebert (408) 532-PAEI (7234) or email: khebertdms@paei.org.

You may also visit the web sites of BIS <http://www.bis.doc.gov/> or PAEI <http://www.paei.org/> for more information.

Please register early, seating is limited!

Please complete one registration form for each attendee. Please print clearly.

Attendee Name: _____ Job Title: _____

Company Name: _____

Street Address: _____

City, State, ZIP: _____

Phone: _____ Fax: _____

E-mail: _____

Check No. _____ Amount _____

PAEI Member: YES NO (circle one)

Under Secretary of Commerce Visits the Silicon Valley

By Tansie Iwafuchi, PAEI Director

Dr. David H. McCormick serves as the Under Secretary of Commerce for the Bureau of Industry and Security. Prior to his appointment as Under Secretary, Dr. McCormick was the President of Arriba Inc. and the President and CEO of Free Markets, Inc. Dr. McCormick has a degree in mechanical engineering from the U.S. Military Academy at West Point, and Ph.D. from the Woodrow Wilson School of Public and International Affairs, Princeton University. He is a former Army officer and a veteran of the first Gulf War.

Dr. McCormick visited Sun Microsystems Executive Briefing Center in Menlo Park, California, on July 27, 2006 to speak with industry on important export compliance issues. The American Electronics Association (AEA) and Mr. Hans Luemers, Director of International Trade for Sun Microsystems hosted this important event.

Dr. McCormick had three main topics he told the audience that he would be focusing on over the next several months.

1. The U.S.-India relationship. Dr. McCormick noted that improvements that have been made to allow more traffic to flow between the two countries, and that in the future, the U.S. should be exporting more items to India.
2. Refining deemed exports regulations and the future role of the Federal Advisory committee.

3. China export policies and our Wassenaar partners. The Undersecretary has met with our Japanese trade partners, and he plans to meet with French, Belgian, Ukrainian and Russian partners on the topic of technology transfer to China in early September 2006.

Dr. McCormick also stated that the focus of the Federal government regarding Chinese affairs would be in the in the areas of: intellectual property protection, human rights, and military modernization.

Dr. McCormick asked that industry continue to send comments on the validated end user proposed regulations to the Bureau of Industry and Security. Dr. McCormick expressed disappointment that industry was not “celebrating” the proposed regulations. He stated that the government needs data and facts from industry in order to make informed regulatory decisions.

Industry comments at the seminar focused on the proposed regulations. Some companies expressed concerns that the new regulations would force them to make further inquiries about military end-uses from their foreign distributors. This is very difficult for some manufacturers who produce commodity items. These items are typically sold to distributors, which may sell them to end users, or may even sell them through several layers of local distribution before the commodity reaches the final end user(s). Several people expressed concern about 5D992 products, and the implications the regulation would have on all 991, 992, and 999 items in every category.



WATCH US GROW!

May 2006

New

Char Henderson	Seki-Technotron USA
Sherri Fumo	Seki-Technotron USA
Sophia Chan	Zoran Corporation
Lee Delos Reyes	Zoran Corporation
Susan Wight	Quantum3D, Inc
Joan Wood	Quantum 3D, Inc
Matthew Goldstein	Snell & Wilmer, L.L.P.
Charles Streeper	
Joanne Vliet	Silicon Valley US Export Assistance Ctr.

Renew

Mike Outlaw	Atheros Communications
Kevin Leedy	Atheros Communications
Loree Stevens	Symmetricon
Diana W. Rowles	Symmetricon

June 2006

New

Ellen Pierce	Presidio STX, LLC
Delilah DeMayo	Presidio STX, LLC
Mario E. Andalon	DHCL Logistics
Brittany Whiting	Quantum 3D
Michael Schwartzberg	KLA-Tencor, Inc

Renew

Rajat P. Kuver	Advanced Immigration Solutions, Inc.
John F. McKenzie	Baker & McKenzie
Linda Rushton	Adobe
Mercedes Aguilar	Adobe
Prentice Wells	TradeBeam, Inc
Matt Passell	TradeBeam, Inc

July 2006

New

Fatima Guadamuz-Cabral	Credence Systems
Alpha Robinson	MasterBrand Cabinets
Felix T. Luy	Savino Del Bene USA

Renew

Kory Minners	Dionex Corp.
Susan Leavitt	Geometrics, Inc
Khaled Hamade	CAL MICRO, INC
Deborah Mannia	
Tom Mumby	Integrated Device Tech.
Pat Toich	Integrated Device Tech.



P.A.E.I. Membership Information

The Professional Association of Exporters and Importers is an organization of professionals involved in import/export activities. Objectives of the association include promoting and fostering the role of the import/export professional, providing on-going education relative to regulatory issues, exchanging information and enhancing industry's participation in import/export control issues and policies.

P.A.E. I. sponsors quarterly luncheon meetings with featured guest speakers, a bimonthly newsletter, networking and job placement opportunities.

P.A.E.I. membership represents both large and small companies in the high-technology community. Membership is open to all persons interested in personal and professional growth in the international arena. Two types of memberships are available and are valid for one year from date of payment. For more information call the PAEI Message Center at telephone (800) 930-PAEI.

Complete this application and return it along with your check. Make checks payable to: Professional Association of Exporters & Importers, P.O. Box 612743, San Jose, CA 95161-2743. PAEI's TAX ID NO: 680117035. You may also pay online for your membership at the PAEI web site <http://www.paei.org/>.

Check Membership Choice:

\$50.00 Individual \$150.00 Corporate*

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Title : _____

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Company/Corporate Name: _____

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City, State and Zip: _____

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2nd Name: _____

Title: _____

Phone: _____ **Fax:** _____

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