

Professional Association of Exporters and Importers

“Leaders and Partners in Worldwide Regulatory Compliance”

May 2006

Volume 20, Number 2

C-TPAT Application Temporarily Suspended

By Jo-Anne Daniels, PAEI Director

C-TPAT, the voluntary government-business initiative to strengthen and improve the international supply chain, has been temporarily suspended. U.S. Customs and Border Protection (CBP) will not accept new on-line applications for C-TPAT participation until CBP has implemented the new C-TPAT Security Link Portal system. CBP has said the internet web portal will enhance and improve the processing and communication for all C-TPAT participants. The expected timeframe for portal implementation is May 2006.

According to CBP, the portal will be mandatory for all eligible participants. If a C-TPAT certified member fails to update and maintain the information in the portal, **CBP will remove the company from the program and the company will be required to reapply.** CBP has given a schedule when participants are required to access and update the C-TPAT Security Link Portal. Importers must create and update its security profile by July 1, 2006.

The Primary Point of Contact (POC) for each member participant is authorized to create the new account, have access to the portal, and add additional users who have the ability to add/change portal information such as company name, business information, supply chain security profile, etc. CBP only wants one point of contact who will be contacted in case of emergency. However, other authorized users within the company will be enabled to perform the administra-

tive functions, which might include uploading the initial application.

For further information, please see the CBP website, CBP portal questions and answers:

http://www.cbp.gov/xp/cgov/import/commercial_enforcement/ctpat/implement_portal/

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/>

Inside this issue:

C-TPAT Application Temporarily Suspended By Jo-Anne Daniels	1
PAEI Board of Directors and Officers Contact Information	2
Tariff Classification of Certain Electronic Products Falling Under HTS 8543 Changed -- By George R. Tuttle	3
Caught in the Throws of a China Catch All A Commentary Written By Gieselle Perez	4
Bypass Entries Not Accorded “Treatment” Under 19 U.S.C. By George R. Tuttle	5 - 6
April 25, 2006 “Export Technology Controls” Event By Jo-Anne Daniels	6 - 9
May 17, 2006 PAEI Seminar on Dual Use Items	10
Watch Us Grow!	11
Upcoming Events, Newsletter articles	12
P.A.E.I. Membership Application	13

ZERO IN ON THE RIGHT EMPLOYEE!

We'll advertise them free of charge!

Advertise your job openings with P.A.E.I.!

Detailed instructions on how to post jobs are
available at <http://www.paei.org/>

Visit our web site for meeting
details, membership information, and
valuable trade resources.

<http://www.paei.org/>

P.A.E.I. NEWSLETTER

*Published bimonthly by the Professional Association
of Exporters and Importers, P.O. Box 612743, San
Jose, CA 95161-2743; Message Center (408) 532-
PAEI, or (800) 930-PAEI.*

Board of Directors; Jo-Anne Daniels, Tansie Iwafuchi,
Dan Kromat, Gieselle Perez, Dixon Reilley

Officers; President - Open; Chairman of the Board - Dan
Kromat; VP Development - Cindy Shull Lakey; Secre-
tary - Laura Putnam; Treasurer - J. Dixon Reilley

Committee Chairs; Education, open; Marketing, Tansie
Iwafuchi; Membership, Yanfeng Zhang; Programs,
Karen Birtola; Publications, Peter Miller

Editor; Gieselle Perez

Publisher; Karen Hebert, Direct Mail Services

*Articles for publication, letters to the editor, and requests for cop-
ies should be submitted to dan.kromat@ksicorp.com, or on disk-
ette to the P.A.E.I. PO Box in San Jose. Articles must be submitted
to the Editor NLT the 3rd of each odd month, Newsletters will be
emailed the 1st of each even month. P.A.E.I. does not guarantee
the accuracy of the contents of this publication. For further infor-
mation concerning the topics in the newsletter consult the applica-
ble regulations or your local Department of Commerce or Cus-
toms representative. 2006 P.A.E.I., Inc. All rights reserved.*

2006 P.A.E.I. Board of Directors/Officers

President
Open

Director & Treasurer
J. Dixon Reilley
Reilley and Associates
dreilley@quixnet.net

Director
Gieselle Perez
NVIDIA Corporation
gperez@nvidia.com

Director
Tansie Iwafuchi
National Semiconductor Corp.
Tansie.iwafuchi@nsc.com

Director
Jo-Anne Daniels
Trade Resources & Associates
tra3332003@yahoo.com

Chairman of the Board & Director
Dan Kromat
KSI Corp.
dan.kromat@ksicorp.com

**Vice President for Development, Past Director
& PAEI Co-Founder**
Cindy Shull Lakey
MKdenial.com
cshull@verizon.net

Secretary
Laura Putnam
Applied Biosystems
Laura.Putnam@appliedbiosystems.com

P.O. Box 612743
San Jose, CA 95161-2743
Tel: (408) 532-PAEI
Fax: (408) 274-7611
<http://www.paei.org/>

Tariff Classification of Certain Electronic Products Falling Under HTS 8543 Changed

By George R. Tuttle, III

(*this article first appeared in the May 5, 2006
Tuttle Law Offices Newsletter*)

In a Presidential Proclamation dated [March 31, 2006](#), it was announced that a zero rate of duty was being established for multichip integrated circuits, which, in the past, had been classified by Customs under tariff item 8543.89.96. This Proclamation, however, which appeared in the *Federal Register* on April 4, 2006, created some confusion and uncertainty because it stated: "the HTS is modified to provide for application of zero duties to goods entered under tariff item 8543.89.96." Item 8543.89.96, however, covered more than just multi-chip integrated circuits.

Because the intent of the Presidential Proclamation was to establish a zero duty rate for only multichip integrated circuits, the Office of the U.S. Trade Representative determined that technical corrections to the tariff needed to be made. Subsequently, in a Federal Register notice dated [April 28, 2006](#), the Trade Representative corrected the inadvertent error in the Presidential Proclamation, and made conforming changes to the HTS so that the intended tariff treatment is provided. The notice provides that, effective April 1, 2006, subheading 8543.89.96 is deleted and replaced by two new subheadings:

1. Subheading 8543.89.93 for multichip integrated circuits, for which the duty rate is now zero.
2. Subheading 8543.89.96 has been renumbered as 8543.89.97, and broken out, as follows
 - o 8543.89.9720 Resistor/capacitor networks

- o 8543.89.9760 Amplifiers
- o 8543.89.9770 Special effects pedals for use with musical instruments
- o 8543.89.9795 Other

Accordingly, products other than multichip IC's that were previously classified under subheading 8543.89.96 should now be entered under new subheading 8543.89.97, at the existing 2.6% duty rate.

The April 28 notice also states that the following new additional U.S. Note 14 to Chapter 85, is inserted:

14. For purposes of subheading 8543.89.93, the term "multichip integrated circuits" refers to multichip integrated circuits consisting of two or more interconnected monolithic integrated circuits combined to all intents and purposes indivisibly, whether or not one or more insulating substrates, with or without lead frames, but with no other active or passive circuit elements.

If the prior but no longer existent subheading 8543.89.96 is used for any product, the entry will be rejected by the ABI system, and the entry will need to be re-filed using the new, appropriate subheading.

If you have any questions regarding the change in the duty rate for multichip integrated circuits, or the *Federal Register* notice that published the changes, please contact George R. Tuttle at (415) 288-0425 or grt@tuttlelaw.com, George R. Tuttle III at (415) 288-0428 or geo@tuttlelaw.com, or Gary L. Graff at (415) 986-8780 or glg@tuttlelaw.com.

George R. Tuttle, George R. Tuttle, III and Gary L. Graff are attorneys with the Law Offices of George R. Tuttle in San Francisco. The information in this article is general in nature, and is not intended to constitute legal advice or to create an attorney-client relationship with respect to any event or occurrence, and may not be considered as such.

Caught in the Throws of a China Catch-All

Commentary Written By
Gieselle Perez, PAEI Director

Where did my diversion statement on my invoice fail me? How did my definition of “knowledge” jump by leaps and bounds? How do I find myself in the midst of this proposed China Catch-All? I believe many of us who hold spiffy titles like Export Compliance or Trade Compliance Manager struggle with these sorts of proposed regulations every day. As for me well I gave up the spiffier title of Sr. Import/Export Specialist to become a US Export Administrator. Unfortunately although the title changed the need to know didn’t. So now I’m caught in the throws of the “China Catch-All” and my definition of knowledge keeps soaring beyond my wildest dreams.

So where does it end? Well with the proposed “China Catch-All” it purports to end with the end user and the end use. The whole purpose of this proposal is to “prevent exports to the People’s Republic of China (PRC) that would make a material contribution to the PRC’s military capability.” Simple enough you say, however, here is where my knowledge definition starts jumping by leaps and bounds. This proposal makes references to “reason to know” or “reason to believe” and states that knowledge standard is narrower in scope. My knowledge definition is taking a turn and it’s headed straight for end user certificates. While I sit and contemplate the need to know or the reason I should know flashes of end user certificates dance in my head. This coupled with the new proposed license exemption Certified End User (CEU). Looks like I’m going to need to know how to configure this new license exemption into our global trade compliance export system. Not only am I going to have to configure it, but if I want to use the CEU license exemption I’m going to be required to submit some annual

reports to BIS. I’m not sure when and where I signed up for global policing? Maybe I should ask for a spiffier title?

In the meantime, maybe I should start asking my end users to apply to be Certified End Users? Or better yet start reviewing my export procedures in preparation for those routine based audits that BIS is proposing with the use of the CEU license exemption. Looks like my questions only began with the end user and end use rather than ending there. This new proposal after all revises the end user requirements to encompass “all exports of controlled goods and technologies.” In light of these new requirements BIS will only require that exporters provide the serial number of the PRC End User Certificate when applying for a license application. This logic seems to go in line with the save a tree but cut down the rest of the forest mentality. BIS does realize that this new proposal will create more work for the exporter and they estimate 15 minutes to prepare the end user certificate in the proposal. However, they don’t reference how long it will take to get commodity classifications. The proposal stipulates that in order to use the CEU license exemption exporters will be required to “obtain a valid Commodity Classification.” No more self classifying if you go the route of CEU. Certified End Users, moreover will also have to demonstrate effective controls over the controlled commodities. Basically becoming a Certified End User will give BIS a hall pass to inspect facilities in order to ensure compliance. Is this C-TPAT for the exporter? Whatever, it is or purports to be it does equate to more work in the interest of National Security and the non-proliferation of weapons of mass destruction.

This article was prepared by Gieselle Perez, a U.S. Export Administrator at NVIDIA Corporation in Santa Clara, CA.

Bypass Entries Not Accorded “Treatment”

Under 19 U.S.C. §1625, But Entries by Other Importers DO Qualify

By George R. Tuttle

In order to properly classify their products for entry into the U.S., importers need to be able to rely upon prior Customs rulings and “treatment” given those products for tariff purposes. Two recent Federal Circuit court cases discuss whether changes in treatment by Customs require publication of notice under Section 1625.

No Customs “Treatment” for Bypass Entries

The first case, *Motorola, Inc. v. U.S.*, held that entries liquidated by way of the bypass procedures have not been accorded “treatment” by Customs, and thus notice and public comment under Section 1625 may not be required in this situation.

Between 1995-97, Motorola filed more than 900 entries of circuits used in battery packs for cell phones, duty free under subheading 8542.40.00. Although the products had historically been examined by Customs, the entries during this time period were bypassed. After reviewing 92 of the bypassed entries, Customs rejected Motorola’s classification and liquidated at a 3.2% rate under subheading 8536.30.80. Motorola protested, Customs denied the protest, and the importer filed an action in Court of International Trade (CIT).

On appeal, the Circuit Court concluded that because it was not clear whether the word “treatment” in Section 1625 covered bypass entries, it was necessary to look to Customs’ interpretation of that term in the regulations. The Court noted that the current regulations at Section 177.12(c)(1)(ii) provide that Customs will give “no weight” to transactions it processes expeditiously (such as bypass entries) without examination or Customs officer review.

The Court deferred to the language in the new Customs regulation even though it was not issued by Customs until after the transactions in this case took place. The full Court opinion in the *Motorola* case may be accessed at <http://www.fedcir.gov/opinions/05-1025.pdf>.

Since bypass entries are not accorded treatment, importers should seek rulings from Customs to resolve classification issues rather than rely on prior treatment in this situation.

“Treatment” Can Include Other Importers’ Transactions

The second case regarding treatment, *U.S. v. California Industrial Products*, appears to benefit importers because the Court broadly interpreted the term “treatment” under Section 1625 to include substantially identical transactions involving parties other than the subject importer.

In this case, CIP, a domestic manufacturer of steel sheet products, filed drawback claims for steel scrap, which Customs denied. Prior to the denials, Customs had liquidated 145 entries of steel scrap filed by five companies other than CIP. CIP then filed a protest, also denied by Customs, and the company sought relief in the CIT

On appeal, the Circuit Court ruled in favor of CIP, stating that because Customs failed to engage in a notice and comment process before rejecting CIP’s drawback claims (contrary to Section 1625), it is bound by its earlier treatment of other importers’ steel scrap eligible for drawback. The Court concluded that Congress clearly intended that “substantially identical transactions” in Section 1625(c) include transactions of parties other than the person claiming entitlement to the statute’s notice and comment process.

The Court reached this conclusion in spite of the language in the newly enacted Customs regulation stating that treatment arises only as a result of transactions involving the same person claiming the benefits of the statute. Rather, because the language of Section 1625 itself provides that interested parties be given notice, treatment includes transactions other than those of just the one person claiming the right to notice and comment. The Court also cited legislative history and the language of the prior regulation in concluding that treatment of other parties' entries could be considered in the analysis. The *CIP* case may be accessed at <http://www.fedcir.gov/opinions/05-1087.pdf>.

The case is significant because it establishes that importers can rely upon rulings pertaining to other parties to establish a treatment, and any changes by Customs would need to be published with an opportunity for comment.

If you have any questions regarding the recent federal cases discussed above, please feel free to contact Gary L. Graff at (415) 986-8780 or glg@tuttlelaw.com or George R. Tuttle at (415) 288-0425 or grt@tuttlelaw.com.

George R. Tuttle, George R. Tuttle, III and Gary L. Graff are attorneys with the Law Offices of George R. Tuttle in San Francisco. The information in this article is general in nature, and is not intended to constitute legal advice or to create an attorney-client relationship with respect to any event or occurrence, and may not be considered as such.

PAEI Presented “Export Technology Controls” Event on April 25th

By Jo-Anne Daniels, PAEI Director

April 25th PAEI presented the “Export Technology Controls” event featuring international trade professionals and trade attorneys. The presenters were experts in their fields who shared their knowledge with the PAEI attendees. Adobe Systems, Incorporated graciously offered their conference room. Lydia Bostillo, of Adobe and a long-term PAEI member assisted with the program execution.

Olga King, Export Compliance Manager and Empowered Official from Jet Propulsion Laboratory (JPL) was the first speaker and she presented “Export Compliance Management.” She outlined the export compliance best practices and compared them with best practice realities. She related her experiences building a support structure, identifying and assessing compliance exposures and costs, and creating an export compliance plan strategy to mitigate corporate exposure.

Ron Oliver, Senior Export Control Officer from Jet Propulsion Laboratory (JPL) was the second speaker and his topic was “Control of Technology Transfer.” Ron discussed how technology is released and how to build processes and a team to control the release of technology. Ron’s background is in engineering and he applies his knowledge in managing technology transfer and export control at JPL.

Dan Fisher-Owens is an attorney from Berliner, Corcoran & Rowe, LLP and presented “Software Classification and Commodity Jurisdiction in the Context of EAR and ITAR Deemed Export Compliance.” Dan gave an overview of the jurisdiction and classification determinations for setting appropriate controls on software. He discussed the difference in classification approach between ITAR and EAR software. Dan concluded his program advising that re-

cent ITAR enforcement action was based on mere “access” of controlled technical data to foreign nationals, but so far Commerce has not decided if they will follow this aggressive interpretation. Consequently, Dan recommended a best practice to treat server access as both an export and a deemed export.

Richard J. Pettler, Partner, Fragomen, Del Rey, Bernsen & Loewy, LLP presented “Deemed Export Life Cycle Case Study.” Richard gave an account of a deemed export case study which included recruitment, hiring and deployment of foreign persons. He discussed the importance of licensing decision analysis, and implementing a Technology Control Plan when a company hires foreign nationals. Other important elements he addressed were how to manage physical and systems accesses, evaluate organizational changes and to remain vigilant regarding third-party contractors/collaborators when a company employs foreign persons.

The concluding program was George R. Tuttle, III who presented “The New ‘China Catch-All Rule.’ ‘Will it Catch You?’” There was a proposed rule in the fall of 2005 to amend the EAR (part 744) and impose special end-user controls on export, re-exports and in-country transfer for items when it is known that articles are intended for “military end-uses” to specific countries including China. George reviewed who is covered by the rule and when it applies. In addition, he discussed the products, the type of activities and entities covered in the proposed rule. His final note was to question what is the exporter’s responsibility regarding how far down the distribution chain exporters should continue the compliance due diligence review.

The program concluded after the PAEI board gave speaker gifts to the presenters and distributed thank you gifts to the attendees who participated.

An additional article on **Exporting Technology and Software, Particularly Encryption** written by Benjamin H. Flowe, Jr. of Berliner, Corcoran & Rowe, LLP can be found at:

www.paei.org/EXPORTINGTECHNOLOGYANDSOFTWAREMAR2006.PDF.

Pictures from “Export Technology Controls” Event on April 25th



Pictures from “Export Technology Controls” Event on April 25th



Pictures from “Export Technology Controls” Event on April 25th





Professional Association of Exporters and Importers

“Leaders and Partners in Worldwide Regulatory Compliance”

and

The Office of Nonproliferation and International Security

Presents

Dual-Use Items: Civilian Products, Military Applications

...What they are, who wants them, what licensing officers need from Industry!

DATE: Wednesday, May 17, 2006

SPEAKERS: Mr. Toli Welihozkiy, Deputy Director, Department of Energy Technical Staff

TIME: 8a.m. Networking and Executive Breakfast, 9a.m. – 12 noon conference

LOCATION: [National Semiconductor Corporation](http://www.nsc.com/), 955 Kifer Road (off Lawrence Expressway) Building 31, Sunnyvale, CA. 94086-5208. Phone 408-721-5000 <http://www.nsc.com/>

Join P.A.E.I. members for a half-day seminar on EAR99 and lower level (XX991/XX992) EAR controlled commodities and their applications as dual-use items. You’ve read the regulations, you know you have a reason to know, now come hear the experts discuss how can wireless LAN be used to detonate bombs, the uses commercial semiconductors have in military applications, how a EAR99 video game card be used for military surveillance, etc.! Planned topics also include:

- Department of Energy’s stance on the catch-all provisions
- Types of ‘red flags’ the Department of Energy is looking for on export license applications
- Overview of the current non-proliferation threats (what foreign militaries are buying right now, and what to look for to protect your company)
- The role of intelligence in reviewing applications
- Meet the Department of Energy and Office of Non-Proliferation technical and licensing staff

Speakers will provide practical and useful informational handouts to allow attendees to understand the issues and bring them back to their companies.

Price: **FREE for PAEI members only.** This event is free to corporate and individual members.

If you would like to become a member and attend this event please go to

<http://www.paei.org/join.htm> and join now.

Registration: You must register in advance for this seminar. Please send your completed reservation form to Karen Hebert by email: khebertdms@aol.com or by fax: 408-274-7611. **You must RSVP by May 12, 2006.**

For further information about seminar content, please contact PAEI Director, Tansie Iwafuchi, email: exportgeek@yahoo.com , phone 408-721-5001. To become a PAEI member, visit <http://www.paei.org/>

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

Please be sure to fill out the form completely. Registration information and further notices about the guest speakers will be sent by email prior to the day of the event.

PAEI Membership No. _____ (required)

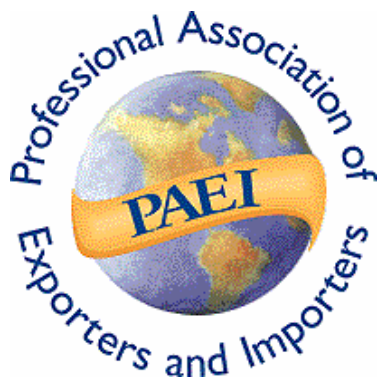
Name

Company

Address

Telephone No.

E-mail address



WATCH US GROW!

March 2006

New

John Burgess	Omnnicell, inc
Maryann Moreno	Maxtor Corp.

Renew

Jennifer Toralba	Telogy, Inc
Nicole Halaby	Telogy, Inc
Laura Lyons	Palm, Inc
Joseph Smith	SDV (USA)
John Ramirez	CPI
Toni Paytas	Thomsen and Burke LLP
DJ Garner	Logitech
Ron Parham	Logitech
Johanna Avery	KLA Tencor
Many Litonjua	KLA Tencor
Anne van de Heetkamp	TradeBeam
Yvette Powell	TradeBeam

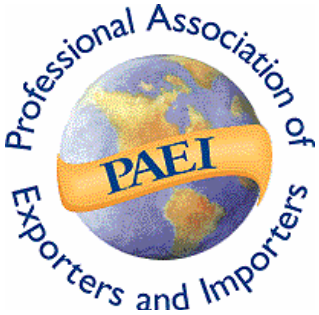
April 2006

New

Jeff Hopkins	Altera Corp.
Emerson Erazo	Emerson Trade Partners, Inc
Diana Krenning	Silicon Graphics
Thai Le	International Market Link
Christel Vilogron	Solectron USA, Inc
Kevin Pouya	Solectron USA, Inc
Jackie Kojian	PerkinElmer Optoelectronics
John Kim	PerkinElmer Optoelectronics
Eleanor Alderette	Trend Micro
Amber Jarzombek	RFMW, Ltd.
MaryAnn Omerod	VisionSafe Corp.

Renew

Brian Clark	Eudyna Devices USA
David Castro	Eudyna Devices USA
Nancy Heider	Rackable Systems, Inc
Angela Colvin	Altera Corp.
William Carter	Varian Medical Systems, Inc
Eva Nash	Varian Medical Systems, Inc
Aaron Hardy	Expeditors International
Ken Hashimoto	Expeditors International
Karon Giovannoni	Matheson Tri-Gas
Rafi M. Sekandar	Scientific Technologies, Inc
Russell Y. Thomas	Scientific Technologies, Inc
Cindy Shull	MKdenial.com



WATCH US GROW!

Cont'd...

May 2006

New

Adriana Rivas	PerkinElmer Optoelectronics
Melissa Irmen	Integration Point
William P. Conroy	Tyler Search Consultants
Kristi Purcell	Tyler Search Consultants

Renew

Martina de la Torre	Symantec Corp.
---------------------	----------------

PAEI Members Get Involved!

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 peterjmillier@comcast.net

The PAEI Board of Directors would like to hear from our members about the subject of C-TPAT Certification. We value your opinion.



Customs-Trade Partnership Against Terrorism - a voluntary partnership between Customs & Border Protection (CBP) and industry to secure the international supply chain.

Has your company:

- Thought about obtaining certification but did not
- Or did it follow through and obtain C-TPAT certification

You may also send PAEI further comments on any experiences you might have had dealing with the C-TPAT certification process.

Our members are listening and waiting for your comments. Please send your comments to:

khebertdms@aol.com or tra3332003@yahoo.com.

**Upcoming P.A.E.I./BIS Events Mark
Your Calendars!**

- **May 17, 2006**
“Dual-Use Items”
- **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 is always interested in offering the education that our members need. If you want to suggest a topic for a future course, please call one of the PAEI Board Members.

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



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*

Name: _____

Title: _____

Phone: _____ **Fax:** _____

E-mail: _____

Company/Corporate Name: _____

Mailing Address: _____

City, State and Zip: _____

***Corporate members please indicate second name:**

2nd Name: _____

Title: _____

Phone: _____ **Fax:** _____

E-mail: _____

How did you hear about P.A.E.I.? _____