



PROFESSIONAL ASSOCIATION OF EXPORTERS & IMPORTERS

**UNVERIFIED PERSONS
AND RED FLAGS**

By Tansie Taylor, PAEI Marketing Chair

The Bureau of Industry and Security (BIS) has begun to take "preventive enforcement efforts" that include listing selected entities as "red flag" concerns. This new listing of entities is called the Unverified List. "

Entities on the list were added after federal officials were unable to perform a post shipment verification with respect to certain export control transactions.

The Unverified List identifies the foreign end-users and consignees involved in such transactions. The listing of an entity or person on the Unverified List does not equate to a need to procure an export license (as may be the case for those parties on the Entities List in 15 CFR part 744.)

Exporters are advised that transactions with these entities require heightened scrutiny and advise use of the "Know Your Customer" guidance set forth in Supplement No. 3 to 15 CFR part 732.

The "Know Your Customer" Guidelines state that exporters have an affirmative duty to inquire, verify, or otherwise substantiate that the transaction does not involve a proliferation activity prohibited by part 744, and does not violate other provisions of the EAR. If the exporter is satisfied that these conditions are met, the transaction may proceed.

If an exporter continues to have reasons for concern after the inquiry they must cancel the transaction or apply for an export license.

BIS may add entities affiliated with a person on the Unverified List by virtue of ownership, control, position of responsibility, or other affiliation or connection in the conduct of trade or business to the Unverified List.

The Bureau of Industry and Security manages and maintains three lists of parties, which require special

care and attention: The Denied Persons List, the Entity List and the Unverified List. The stipulations for doing business with entities on these three lists vary but may include procuring licenses for all transactions, procuring licenses for certain products or end-uses, limiting export activities in certain countries, or complete denial of export.

In addition to the three lists which are made available to U.S. exporters, the Export Administration Regulations (EAR) provide that BIS may individually inform exporters that a license will be required for exports or reexports to certain entities. These "Informed" letters are not available to the public or to other U.S. exporters but are specifically applicable to the exporter receiving the notification.

For the full Federal Register text visit: <http://www.bxa.doc.gov/>

(Tansie Taylor currently serves as the PAEI Marketing Chair and works for Sun Microsystems in Santa Clara)

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SUPPLY CHAIN SECURITY IS OF HIGHEST PRIORITY TO CUSTOMS

By George R Tuttle III,
Law Offices of George R Tuttle

(Article appeared in the March 5, 2002 newsletter of the Law Offices of George R Tuttle. Reprinted with permission)

“The single-most important priority for the Customs Service for today and for the foreseeable future is anti-terrorism,” said Tom O’Brien, Director of U. S. Customs Services Management Center for the Pacific Region, at a recent seminar on its “Customs-Trade Partnership Against Terrorism” (“C-TPAT”) program. According to O’Brien “this is more important to us than trade enforcement or even narcotics interdiction.”

To prevent the introduction of biological, chemical, and weapons of mass destruction, Customs is dramatically stepping up its efforts to screen for and examine what it calls “containers of concern.” “This is inevitably going to result in the delay of the release of containers,” noted O’Brien in this talk. He went on to say that while the Port of San Francisco is at the forefront of container screening technology, there are some West Coast Ports that are already full with containers waiting to be screened and examined.

O’Brien then explained how importers can avoid these delays by becoming members of the “Customs-Trade Partnership Against Terrorism,” or “C-TPAT” as it is known. Under the program, containers imported by members of CTPAT that are exported through a secure supply chain will be considered “low risk,” and allowed to clear without the same inspection requirements as containers moving through a non-secure supply chain. This program is a “win-win” situation for importers and Customs, noted O’Brien. Importers get their cargo sooner, and Customs can focus its efforts and resources on the “high-risk” containers.

Containers that are most at risk are those that are from unknown sources, those that contain unknown cargo, those that originate from countries of concern, and those that move through known transshipment points. To avoid the inevitable delays that will occur, importers can take steps to secure their cargo and supply chain. Once this is done, the containers will not have to be examined.

Benefits of Participation

While ocean shipping containers are the most “at-risk”, Customs is encouraging all importers to join the C-TPAT program. To encourage this, Customs is earmarking many of its new programs, such a periodic-payment and its new Importer Assessment Program, for only C-TPAT members. Benefits of participation in C-TPAT include:

- Reduced inspections
- An assigned Customs account manager;
- For current Low Risk Importers (LRIs), an opportunity to expand “low-risk” treatment to all divisions within the company;
- Access to the C-TPAT membership list;
- Eligibility for account-based processes (e.g., bimonthly/monthly payments);
- Participation in Customs Importer Self Assessment program.

What Does It Take To Join?

Joining the C-TPAT program is a two-step process. First, the importer fills out the Cargo Security Questionnaire and then signs a Memorandum-Of-Understanding (MOU) that commits them to the program.

In the MOU, participants agree to implement Security Recommendations issued by Customs, which will contain detailed suggestions for establishing, improving, or amending security procedures along the company’s entire supply chain. Security recommendations will be made after Customs reviews the importer’s completed supply chain security profile questionnaire and engages in discussions with the importer.

Implementation of the program, however, falls on the importer. It will be the responsibility of the importer to secure the commitments necessary from foreign suppliers to secure the cargo at the time of delivery to the first carrier in the supply chain. In the case of non-related suppliers, these commitments may have to be contractual.

Customs also expects importers to audit or inspect the facilities of their suppliers on a periodic basis to ensure that they are carrying out their commitments. Inspections can be done by the importer or by competent third parties.

“If the exporter is too small or not interested, the importer has a couple of choices,” noted O’Brien, “it

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can switch suppliers or it can use an intermediary to screen and secure the cargo before it moves to the next stage.”

Customs eventually expects the complete supply chain will be covered, including carriers, forwarders, and Customs brokers. To facilitate the process, Customs will make information available to C-TPAT members about other members, including those in the delivery supply chain. That way, importers can select those carriers, forwarders, and Customs brokers that are C-TPAT approved, or otherwise require suppliers to use only C-TPAT approved carriers and forwarders.

What Kind Of Program Is Needed?

Customs is looking for the importer and foreign supplier to have the following types of security programs in place or under development:

- **Procedural Security:** Procedures should be in place to protect against unmanifested material being introduced into the supply chain.
- **Physical Security:** Buildings should be constructed in a way that resists unlawful entry and protects against outside intrusion. It should include the segregation and marking of international, domestic, high-value, and dangerous goods cargo within the warehouse by a safe, caged or otherwise fenced-in area.
- **Access Controls:** Access controls should include positive identification, recording, and tracking of all employees, visitors, and vendors.
- **Conveyance Security:** Conveyance security involves the protection of the container against the introduction of unauthorized personnel and material before or during shipment.

Personnel Security: Importers and suppliers should conduct employment screening and interviewing of prospective employees to include periodic background checks and application verifications.

- **Manifest Procedures:** Companies should ensure that manifests are complete, legible, accurate, and submitted in a timely manner to Customs.
- **Education and Training Awareness:** A security awareness program should be provided to employees including cargo integrity, and determining and addressing unauthorized access.

What Should You Do First?

This program is very important to the Customs Service, particularly as the Service moves towards merging into the new Department of Homeland Security. And, while it is described as a voluntary program, Customs is stepping up efforts to get U.S. companies to sign up. The current goal of the Commissioner of Customs is to have 1000 importers signed up for the program by the end of Customs fiscal year (October 31st). Currently, Customs has about 274 companies signed up for the program.

Step One: As a first step, we recommend that the company download and review the Cargo Security Questionnaire, Memorandum-Of-Understanding and Customs’ Security Recommendations.

Step Two: The company should assemble an inter-department committee made up of affected groups (such as: logistics, manufacturing, security, purchasing or procurement, and supply chain management) to review and discuss the pros and cons of participation in the program.

Step Three: Conduct an initial evaluation of your company’s existing cargo security efforts, and that of any related party suppliers and key third party suppliers and vendors (i.e., third party JIT warehouses, Foreign Trade Zones and bonded Warehouses). Initial supplier valuations can be done in writing, by phone or through interviews with company individuals who visit the supplier on a regular basis. Once the initial evaluation is done, the company can assess the potential cost and/or changes to the company’s business plan that might be required.

For additional information on Customs’ C-TPAT program, please visit our website (<http://www.tuttlelaw.com>), and select the link to our C-TPAT page. If you have any questions or would like a presentation for your company on Customs C-TPAT program, please call (415) 288-0428, or e-mail us at geo@tuttlelaw.com.

(George R Tuttle, III works for the Law Offices of George R Tuttle, located in San Francisco, Ca. The firm specializes in advising clients on the laws of affecting international trade and the importation of merchandise into the United States.)

NEW RULING ON ENCRYPTION TECHNOLOGY

(Article appeared in the Aerospace Export Control Update, Vol. IV, No. 6, June 2002 newsletter of John Black Associates. Reprinted with permission from Chuck Hough, John Black & Associates)

INTRODUCTION

US rules on the export of encryption technology have been changing on the average of every 8 months, beginning in December of 1996. The only constant has been that the rules have been overwhelmingly confusing and ambiguous. The latest ground of changes happened on June 6, 2002. (Please note that the export regulations governing the export of encryption technology consist of general rules and myriad exceptions to these rules. Therefore, the following should be viewed as an overview and your particular situation should be analyzed with reference to the actual regulation. Such exotica as source code, beta-test software, open cryptographic application programming interfaces, etc, are beyond the scope of this article.

LEGAL AUTHORITY

The US has the legal authority to control the export of encryption technology under the Export Administration Act . The regulations that implement this law are called the Export Administration Regulations ("EAR"). You can view the regs on-line at <http://www.bis.doc.gov>. If you are primarily interested in crypto exports you will want to look at section 740.17. This section will reference other sections, but the bulk of the specific rules regarding encryption will be here.

PLAYERS

The Bureau of Industry and Security (BIS) is the primary agency you need to deal with if you want to get export approval for your encryption products. However, the National Security Agency is heavily involved in the process, so you will often need to deal with them.

CLASSIFYING YOUR ENCRYPTION PRODUCTS

ECCNs 5A992, 5D992 and 5E992

Certain products that use encryption technology for limited functions fall under 5A992 (hardware) or 5D992 (software). These products are generally of the following nature:

- Authentication
- Access Control Systems
- Digital Signature
- Some Smart Cards
- Some cell phones and components

Other products also fall within these two ECCNs namely:

- Products that use 56-bit DES or comparable algorithm and key exchange under 512
- Products that use 64-bit symmetric algorithms for data confidentiality and are "mass market"
- Products that use symmetric algorithms of any key length for data confidentiality and are "mass-market."

ECCNs 5A002, 5B002, 5D002

If your product uses encryption and is not covered by the above-mentioned categories, then it is likely caught by 5A002 (hardware), 5B002 (test and production equipment) and 5D002 (software). Technology to make items covered by 5A002, 5B002 or 5D002 is covered by 5E002. Products covered by these ECCNs may be exported in many cases using License Exception ENC. Exports not allowed under ENC need an individual license or Encryption Licensing Arrangement.

EXPORTING ITEMS CLASSIFIED AS 5A992, 5D992 or 5E992

If you make a product that uses encryption (regardless of key length) for limited functions like user authentication, access control, digital signature, or banking you can "self-classify" and ship under No License Required (NLR.)

For products using symmetric algorithms with 64-bit key lengths or less or asymmetric algorithms of 512 bits or less, a simple notification to BIS and NSA is all that is needed to be able to ship under NLR.

If you think you qualify for the exemption for strong crypto "mass market" products, you must file a "review request" to see if BIS agrees with you. The definition of mass market is taken from the Cryptography Note of the regulations:

- a. Generally available to the public by being sold, without restriction, from stock at retail selling points by means of any of the following:

Continued on page 6

1. Over-the-counter transactions;
 2. Mail order transactions;
 3. Electronic transactions; or
 4. Telephone call transactions;
- b. The cryptographic functionality cannot be easily changed by the user; and
- c. Designed for installation by the user without further substantial support by the supplier.

BIS and NSA have stated that they are going to be "strict" when considering requests to classify strong encryption products as "mass market." Specifically, they want proof that the product is sold in a computer store like CompUSA.

For all software, hardware and technology controlled by 5A992, 5D992 and 5E992 you can export to all countries except the terrorist countries, to all end-users except the bad guys under NLR and no reporting is required.

EXPORTING ITEMS CLASSIFIED AS 5A002, 5B002, 5D002 and 5E002

License Exception ENC is the authority that allows you to export most encryption products covered by ECCNs 5A002, 5B002, 5D002 and 5E002. However, before you can use this license exception, you usually need to submit a Commodity Classification request to the BIS/NSA. (If your shipments are confined to subsidiaries of US companies you don't have to go through this step.) You also have to keep records of who you ship to because you need to report to BIS and NSA who you ship to every six months. You can export products to any end-user under ENC in the following countries immediately upon filing a Commodity Classification Request.

Austria, Australia, Belgium, Czech Republic, Denmark, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Japan, Luxembourg, Netherlands, New Zealand, Norway, Poland, Portugal, Spain, Sweden, Switzerland, United Kingdom

If your product uses strong encryption but you want to sell outside these countries, you need to wait 30 days before shipping and you cannot ship to "government end-users" unless your product qualifies as a "retail" product. If it qualifies as a "retail product" it can go to any end-user in any country other than the bad countries under ENC. If it is not a "retail product" it can only go to non-government end-users under ENC. You will be informed when

your Commodity Classification is complete if your product qualifies as retail.

Retail vs. Non-Retail

The concept of "retail" is similar to the concept of "mass-market" discussed previously. Retail products "generally available to the public by being

- (1) sold through retail outlets,
- (2) specially designed for individual consumer use, OR
- (3) which are or will be sold in large volume without restrictions through mail order, electronic or telephone sales.

However, these "retail products **CANNOT**:

- (a) allow the cryptographic functionality to be easily changed by the user,
- (b) require substantial support to install and use
- (c) be modified or customized for the customer
- (d) be designed to be used as network infrastructure products.

Examples of "retail" products are general purpose operating systems that don't qualify as "mass-market", chips designed for retail products, low end routers, firewalls and VPNs designed for the SOHO market, desktop applications that do not qualify as "mass-market", low end servers and application specific servers, network and security management products designed for low end computers and products which contain short range wireless encryption software/components.

RECORDKEEPING

You need to keep records of whom you provide encryption products (i.e., controlled under ECCNs 5A002, 5B002, 5D002 or 5E002) to under license exception ENC. The reason why you need to do this is because you will need to send a report to the Bureau Industry and Security and the National Security Agency twice a year. (See Reporting section below.)

REPORTING

You are required to send in reports to the BIS and the NSA that contains information on who you ship to, and what kind of technical review the product has undergone. This is only necessary for products that are shipped under license exception ENC. Reports are required for shipments under ENC, EXCEPT in the following instances:

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1. You are shipping to a subsidiary of a U.S. company
2. You are shipping to a US bank or financial institution or anyone that does business with them.
3. You are shipping weak crypto products (e.g., under 64-bits).
4. You are shipping a "retail" product to an individual consumer.
5. You are making the software available via free or anonymous download.
6. You are shipping single processor computers, laptops and hand-held devices that are pre-loaded or bundled with encryption software.

The reports are due according to the following schedule:

- For shipments made between January 1st and June 30th, the report is due on August 1st.
- For shipments made between July 1st and December 31st, the report is due on February 1st.

You need to prepare the report in an electronic format and send via e-mail or load onto disk and send to the mailing addresses below:

e-mail addresses:

crypt@bis.doc.gov or enc@ncsc.mil

OR

mailing addresses:

Bureau of Industry and Security
 US Department of Commerce
 Office of Strategic Trade and Foreign Policy Controls
 14th Street and Pennsylvania Avenues
 Room 2705
 Washington, D.C. 20230

Attn: Encryption Reports
 ENC Encryption Request Coordinator
 9800 Savage Road
 Suite 6131
 Ft. Meade, MD 20755-6000

The report should identify:

- Company name and address,
- Contact person and contact information,
- Reporting period
- And for each product the report should include:
- Product name and license or CCATS number for the product
- Ship-to-parties name and addresses, and the quantities and dates of shipment for each.

THE PRESIDENT SIGNS THE OMNIBUS TRADE BILL OF 2002 INTO LAW

By Dan Kromat, PAEI Director

(Reprinted with permission from the KSI June - July 2002, Volume 14, Issues 6 - 7 Newsletter)

The House of Representatives passed the Trade Act of 2002 (H.R. 3009) near the end of July. Surprisingly, the Senate passed the bill in six days. On August 6, 2002 the President signed the Omnibus Trade Bill into law. This trade bill is a 304-page monster to read, but the benefits are top rate!

The first major benefit is (TPA) Trade Promotion Authority for the President, which allows the negotiation of new trade agreements, with only an up or down vote by Congress, until the year 2005, unless extended to 2007. In most respects, this is the trade vehicle that Presidents want in order to obtain beneficial new trade agreements without Congress rewriting the text. TPA may enable the U.S. to offer new trade agreements that will help U.S. exports be more competitive in global markets. There are some congressional consultation and reporting requirements for the President, and "principle objectives" considerations for trade agreements under the TPA. Objectives such as "child labor" and "labor and the environment" may be difficult components of any new trade agreement. Other objectives to be included in trade agreements under the TPA include: anti-corruption; border taxes; dispute settlement and enforcement; electronic commerce; foreign investment; improvement of the WTO and multilateral trade agreements; intellectual property; reciprocal trade in agriculture; regulatory practices; trade barriers and objectives; trade in services; trade remedy laws; transparency; textile negotiations; and WTO extended negotiations.

The second major benefit of this trade bill is the retroactive renewal of the (GSP) Generalized System of Preferences program, through September 30, 2006. Many importers, brokers and trade organizations were likely surprised that congress allowed a five-year window in retroactively renewing GSP. In past renewals of GSP, the cost considerations have been responsible for shortening the window of GSP opportunity to 18-24 months. GSP expired September 30, 2001, however most importers continued

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claiming GSP while paying duties. Importers that continued to claim GSP can expect refunds of duty-paid GSP claims from Customs, with actual checks taking four to eight weeks to process and mail.

Another fairly major benefit to importers is the retroactive renewal and expansion of the (ATPA) Andean Trade Preference Act through September 30, 2006. ATPA benefits goods that are the growth, produce or manufacture of Colombia, Bolivia, Ecuador and Peru. The expansion part of the ATPA renewal offers additional trade benefits for apparel and other miscellaneous goods. The expansion portion is entitled the (ATPDEA) "Andean Trade Promotion and Drug Eradication Act," providing duty-free and quota-free importation for certain ATPDEA apparel, as well as certain tuna, handbags, luggage, flat good, work gloves, leather wearing apparel, watches and watch parts, certain petroleum products, and non-GSP eligible footwear.

Other provisions require (CBTPA) Caribbean Basin Trade Partnership Act and ATPA origin apparel made of U.S. knit or woven fabrics to be dyed and finished in the U.S., and allows that CBTPA and (AGOA) African Growth and Opportunity Act knit-to-shape garments, assembled in a beneficiary country, to qualify for the trade preferences. In addition, this trade bill authorizes additional funding for hi-tech detection devices used at U.S. borders, and increased staffing of the Customs Service.

In the export arena, this trade bill authorizes Customs to make warrantless examination of outbound mail in excess of 16 ounces, and to require electronic manifest and cargo information in advance of the exportation or importation of goods. In addition, this trade bill requires the advance filing of export documentation for cargo loaded in U.S. ports. Twenty-three ocean carriers have already applied for C-TPAT.

The legislative text of the conference version of H.R. 3009 is available at www.house.gov/ways_means.

(Dan Kromat is a licensed Customs House broker working for KSI Corp. in San Francisco, CA. He can be reached at dan.kromat@ksicorp.com, or 650-228-7155.)

WE HAVE HAD SOME GREAT PROGRAMS

By Dan Kromat, P.A.E.I. Director

It seems like only yesterday that I started serving my third term as a member of the PAEI Board of Directors. In the last nine years we have been so fortunate to have talented people volunteer their time and this has brought some terrific events to our membership. In August we sponsored the BIS two-day export regulations course with 125 people signed up.

Back in May we started a seven-week (21 hour) advanced import training course with speakers from the Law Offices of George R. Tuttle, and our enrollment was over 50 participants. This October, PAEI will once again provide basic training seminars in regards to both imports and exports, preceded by two Brown Bag events and a Quarterly Luncheon event, with Roz Thomsen as the speaker. Please watch the PAEI calendar at www.paei.org for more details on these upcoming events.

ELECTION TIME IS HERE AGAIN

By Dan Kromat, P.A.E.I. Director

All good things must end, and our President, Mr. Chuck Stohr has resigned as of December 31, 2002, as he will be spending most of his future time out of state. PAEI will once again be searching for a new President, and hopefully one of our members can step forward or advise the Board of Directors of some possible candidates.

In addition, the terms of three of our board members will expire on December 31, 2002. For those interested, we invite PAEI members to run for election to the Board of Directors. In order to run for a director's position PAEI requires a business background statement(s) and a statement(s) of what you would hope to accomplish as a PAEI director. In addition, PAEI would need a couple of pictures of you (passport type/size). Those running will be identified in the October/November PAEI newsletter, which will have ballots enclosed.

If you have any questions about the open positions with PAEI, please don't hesitate to contact one of our officers or directors.

P.A.E.I. Nomination Letter Board Position 2003 - 2006

PAEI is now taking nominations for three open Board of Director’s seats. Nominations (this form, a biography and picture) should be sent to Karen Hebert at Khebertdms@aol.com or mailed to PAEI, PO Box 3185, Santa Clara, CA 95055-9998. The deadline to submit nominations is October 15th.

To: Nominating Committee Chairperson
Subject: Nomination for Board Position 2003-2006

I, _____ respectfully request the P.A.E.I. Board of Directors /Nomination Committee consider my request to serve on the Board for the period of January 2003, through December 2006. I realize this is a three year commitment and that Board meetings regularly meet once a month and I will be expected to attend as many as possible to insure that I am current on all P.A.E.I. events and administrative functions.

The following is a brief understanding of my professional career and accomplishments that I feel will lend nicely to my efforts to assist P.A.E.I. in meeting their goals and objectives:

I can be reached at the following, should you have any questions regarding this nomination.

Company _____ Phone _____

Email _____

Mailing Address _____

Sincerely,

LARGE GROUP ATTENDS B.I.S. EXPORT REGULATIONS COURSE

By Luke Alexander, PAEI Director

On August 15-16th, over 125 people attended the BIS Export Regulation Course at the Biltmore Hotel in Santa Clara. The course was one of a series of BIS courses that PAEI organizes and hosts for B.I.S. in Northern California.

This course was identical to the one PAEI hosted in May, and covered the following:

- Overview of the Export Administrations Regulations
- Scope of the Regulations
- The Commerce Control List and Country Chart
- The General Prohibitions
- License Exceptions
- Applications, Licenses & Processing
- Electronic Services
- Export Clearances & Record Keeping
- Red Flags

Many of the attendees are just beginning to do business on an international basis and this seminar was their first exposure to export compliance. Twenty of the attendees were from outside of California.

Additional PAEI/BIS Export Regulations courses are scheduled as follows:

- Essential of Export Controls
(1 day) December 3, 2002
- Technology/Encryption Controls
(1 day), December 4, 2002
- Munitions/ITAR Licensing
(1 day) December 5, 2002 – (Tentative)
- Export Regulations Course
(2 day) May 7-8, 2003
- Export Regulations Course
(2 day) September 17-18, 2003

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 Luke Alexander at 408-970-5953.

ROZ THOMSEN TO SPEAK ON EXPORT COMPLIANCE AT OCTOBER 2 PAEI LUNCHEON

By Luke Alexander, PAEI Director

The PAEI Quarterly Luncheon on October 2nd, will feature a talk on current export compliance issues by leading Washington, D.C. lawyer, Roz Thomsen of Thomsen and Burke LLP.

The luncheon will take place from noon to 1:30 PM, October 2nd, at the Biltmore Hotel in Santa Clara. Members will receive brochures in the mail.

Roz is a well known expert in the field of U.S. and multilateral export control. He provides legal counsel on export control matters to many leading Silicon Valley companies. He is considered by many of his clients to be the top legal expert in Washington on the rules of cryptographic export regulations. He is also involved in a number of trade groups, including the Alliance for Network Security and the Americans for Computer Privacy. An author of several articles and whitepapers on the topic of export controls, Roz has guest lectured at several universities and has spoken at over 100 conferences sponsored by various organizations.

Upcoming P.A.E.I. Events Mark Your Calendars!

October 2	Quarterly Luncheon - Roz Thomsen speaker
October 15	Nominations Letter due for PAEI Directors Board
October 16	Back to Basics—Import
October 23	Back to Basics—Export
December 3	BIS Essentials of Export
December 4	BIS Technology/ Encryption Controls
December 4	PAEI Annual Members Mtg

Watch the PAEI web site for these and other events, www.paei.org/.



**WATCH
US GROW!**

July 2002

New

Vicky Perez	Dolby Laboratories, Inc
Jenny Fuchs-Anderson	Dolby Laboratories, Inc

August 2002

New

Sharon McGlynn	Ditech Communications Corp.
----------------	-----------------------------

Renew

Fatima Guadamuz-Cabral	LSI Logic
Sharon Ma	LSI Logic
Maria Legaspi	LSI Logic
Terry Touhy	LSI Logic
Amanda Soukup	BEA Systems, Inc
Debby Mayberry-Jensen	Open Harbor, Inc
Anne van de HeetKamp	Open Harbor, Inc
Sean McCormick	Roanoke Trade Services
Fonda Raley	Roanoke Trade Services

June 2002

New

Abigal A. Waite	Next Level Communications
Larry Clopp	Clopp Consulting
Denise Kennedy	NextLinx Corp.

Renew

Almez Negash	Silicon Valley Ctr for Int'l Trade Dev.
Rafi M. Sekander	Scientific Technologies, Inc.
Russell Y. Thomas	Scientific Technologies, Inc.
John Allan	International Service Group, Inc.
Gigi Kimball	International Service Group, Inc.
Alejandra Rapsis	3Com Corp.
Lynette Sequeira	NextLinx Corp.
Lynne H Chidester	Siemens Procurement & Logistics Services, LLC
David Fong	DHL Airways
Linda Rushton	Adobe Systems, Inc
June Lanning	Adobe Systems, Inc

CHANGE IN EDITOR/PUBLISHER

By Gieselle Perez, PAEI Secretary and Director

The Board would like to extend a warm welcome to our new PAEI Newsletter Editor Fatima Cabral and new Publisher Karen Hebert. We would also like to take this moment to extend our thanks to Cindy Shull Lakey for all her hard work and dedication throughout the years. Cindy has done an excellent job with publishing and editing our past newsletters. We have been fortunate to have her as our publisher and editor for the past 15 years. Thanks Cindy you leave some big shoes to fill. Fortunate for PAEI Cindy still serves as a Director on our Board.



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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 3185, Santa Clara, CA 95055-9998. PAEI's TAX ID NO: 680117035.**

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