



PROFESSIONAL ASSOCIATION OF EXPORTERS & IMPORTERS

**PAEI Election of New Board of
Directors – December 2004**

By: Dan Kromat, Director

The votes have been counted and PAEI is proud to announce we have two new Directors. The new directors are Tansie Iwafuchi & Sergio Retamal. The directors, officers and members of PAEI appreciate the commitment these new Directors are making to PAEI and the international trade community.

We would like to thank Cindy Shull Lakey & Luke Alexander for their valuable time given to PAEI as Directors for the last three years. Both Cindy and Luke made very valuable contributions to the organization, and it is not easy to find the time for PAEI when you have family and employment considerations crying out for your time. We sincerely hope both Cindy and Luke will have the time to be part of future PAEI presentations.

The new Board of Directors will have their first meeting on January 25th at 6pm at the Atmel facility in San Jose. The Board is still looking for future officers and committee chairs for 2005 and we welcome our membership's interest in these positions.

**PAEI 17th Annual
Membership Meeting**

On Wednesday, December 8, 2004, PAEI held its 17th Annual Membership Meeting at the Biltmore Hotel and Suites. Around 50 members attended.

The food was great and everyone had a good time! Raffle tickets were given to each attendee, and door prizes were given out.

PAEI would like to thank the following companies

who donated prizes that were raffled off;

FedEx, Trade Resources & Associates, MK Technology, National Semiconductor, Direct Mail Services and Export Procedures Academy.

The Biltmore Hotel and Suites was very generous in donating the grand prize of the evening, which was a weekend get-away at the Biltmore Hotel and Suites for two people. The grand prize was won by P. Jean Yap.

A special **“Thank you”** to **Lydia Bostillo** for once again coordinating the Annual Membership Meeting. Lydia gathered all the great prizes that were raffled off during the evening and arranged the meeting at The Biltmore Hotel and Suites.

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P.A.E.I. NEWSLETTER

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Tansie Iwafuchi; Membership, open; Programs, Martina
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Publisher; Karen Hebert, Direct Mail Services

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MK Technology
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**P.O. Box 612743
San Jose, CA 95161-2743
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Miscellaneous Trade & Technical Corrections Act of 2004

By Dan Kromat, PAEI Director

On December 3, 2004, President Bush signed into law the Miscellaneous Trade & Technical Corrections Act of 2004, after being stalled in Congress for several years. This law will take effect with respect to merchandise entered, or withdrawn from warehouse for consumption, on or after December 18, 2004, Public Law 108-429 (<http://tinyurl.com/5wrn7>). Relevant changes resulting from the Miscellaneous Trade and Technical Corrections Act of 2004 will be included in the 2005 Harmonized Tariff Schedule (HTS). The HTS should be available soon on the U.S. ITC web site at <http://www.usitc.gov>.

The time to file protest was extended from 90 to 180 days from the date of liquidation. This is great news for most of the protests filed; however the price of this extension was the repeal of 19 USC 1520 (c). 1520 (c) allowed Customs to re-liquidate an entry or reconciliation, within one year of the date of liquidation, correcting a clerical error, mistake of fact, or other inadvertence not amounting to an error in the construction of the law. The new law seems to be a reasonable trade-off. Effective on or after the 15th day after the date of enactment.

Those filing reconciliation entries will be happy to know the time frame for filing has been extended from 15 months to 21 months, excepting NAFTA reconciliation entries. Effective on or after the 15th day after the date of enactment.

Amends 19 USC 1505(a) to provide 12 working days to deposit estimated duties and fees for consumption entries, and allows periodic payment of estimated duties and fees, which would be paid no later than 15 working days following the month in which the merchandise is entered or released, whichever comes first.

Some of the many changes to the drawback law include, 19 USC 1313 (c) now allows limited substitution of merchandise sold at retail and returned and exported or destroyed under Customs supervision, and drawback certificates are not required if the drawback claimant and the importer are the same party for the merchandise sold at retail, etc. Also, 19 USC 1504 was amended to include the liquidation of drawback entries, which unless extended or suspended, shall be deemed liquidated within one year from the date of entry. In addition, a new provision has been added to 19 USC 1313 to allow

for unused direct identification drawback on articles shipped from the U.S. to its insular possessions (1313(j)(1)).

Permanent Normal Trade Relations (NTR) status will be extended to Armenia, and NTR status will be extended to Laos, at a date to be specified by the President. Mauritius is designated as a Lesser Developed Country (LDC) under the African Growth and Opportunity Act (AGOA) for a period of one-year beginning October 1, 2004.

The Caribbean Basin Economic Recovery Act (CBERA) is amended to allow duty-free treatment for footwear, excluding 17 HTS classifications.

The AGOA Acceleration Act of 2004 is modified to expand its retroactively. Importers may now claim duty preference retroactively to October 1, 2000 for certain types of apparel.

The Andean Trade Preferences Act (ATPA) is amended to retroactively reinstate reduced duty treatment for certain Andean handbags, luggage, flat goods, work gloves, and leather wearing apparel.

Hundreds of specific products will have their duty rate reduced or eliminated, effective 15 days after the date of enactment. Please see the public law for these duty reductions or eliminations.

This article prepared by Dan Kromat, Manager Customs Compliance, a Licensed Broker working for KSI Corporation in South San Francisco, CA, . He can be reached at dan.kromat@ksicorp.com or 650-228-7155.

2005 PAEI Membership Directory

The 2005 PAEI Membership Directory will be printed and mailed in early January. If you have not already returned the PAEI Membership form with any corrections, please do so. Please fax corrections to Karen Hebert at 408-274-7611.

If your membership has expired, please contact Karen Hebert by email at khebertdms@aol.com or telephone (408) 532-7234. Only members who are current with their membership dues will be included in the directory. You may pay for your membership by check or by credit card. If paying by credit card, please go to the PAEI web site, <http://www.paei.org/>.

“Update to Update” 12/08/04

By Jo-Anne Daniels, PAEI Director

PAEI members had the opportunity to listen to speakers from Office of Export Enforcement, Department of Homeland Security Immigration and Customs Enforcement, U.S. Department of Commerce, Baker & McKenzie, and industry consultants present some of the updates given at the Department of Commerce, Bureau of Industry and Security Update October 4-5, 2004.

John McKenzie from Baker & McKenzie spoke about the proposed regulations regarding the definition of “Knowledge,” “Exporter’s “Red Flags,” and “Safe Harbor” definition and requirements. He also spoke about the new revisions to the encryption regulations and OEE penalty guidelines. This presentation was very timely and informative and participants responded with questions regarding the proposed regulations for exporters and their responsibilities.

Next we were honored to have Jo Allyn Scott from the Office of Exporter Services, Western Regional Office speak about the Reexport and Transfer issues, foreign asset control, and give a reexport case study. Her presentation was well received.

Jo-Anne Daniels, President of Complete Compliance Solutions, Inc gave an overview of the ITAR changes including some controversial classification cases, review of determining defense articles and service and formal commodity jurisdiction.

Cindy Shull Lakey, Data Manager at MK Technology topic was “Meeting Compliance Objectives.” She spoke about building a solid Export Management System (EMS), finding the resources available to deploy an EMS, and meeting minimum compliance goals.

We were very fortunate to have Craig Spelce from ICE who gave us an overview of ICE’s enforcement focus, arms and strategic technology investigations, and their industry outreach program

called Project Shield American. This was very well-timed because some industry participants have been experiencing ICE outreach visits.

Senior Special Agent R.W. McClish from OEE presented OEE’s mission and enforcement role. He reviewed administrative penalties and the local enforcement case regarding “deemed export” criminal charges for a company in San Jose, CA. He also impressed the audience that OEE seeks to have a cooperative relationship with industry to further National Security and Foreign Policy goals. Agent McClish encourages exporters to call him and he will be very happy to do an on site outreach visit.

PAEI is thankful to the speakers for giving their time to educate our members and keep them updated regarding Exporter’s responsibilities and proposed regulations.

After the seminar, many of the members attended the PAEI annual meeting for networking and Christmas spirit.

This article was prepared by Jo-Anne Daniels, Trade Consultant - Licensed Broker at Trade Resources & Associates, in El Granada, CA, <http://www.traderesourcesandassociates.com/>. She can be reached at tra3332003@yahoo.com or at 650-726-6764

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 that you would like to be included in the next newsletter, please contact Dan Kromat at dan.kromat@ksicorp.com.

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

The PAEI Board looks forward to hearing from its valued members!

Responsibilities of Parties in “Ex Works” Transactions; Routed Export Transactions Under the EAR and FTSR

By George R. Tuttle, III

*(this article first appeared in the November 15, 2004
Tuttle Law Offices Newsletter)*

This is in response to many requests for advice on the responsibilities of parties in an export transaction when the foreign buyer purchases goods on an "ex works" basis.

I. Use Of The Term "Ex Works" By Parties In International Contracts And Purchase Agreements

"Ex works" is more than a shipping term. Use of the term in a contract for the sale of goods contractually defines the roles and responsibilities of the parties. According to "Incoterms 2000," the term "ex works" means that the seller's responsibility for the goods ends when the goods are placed at the disposal of the buyer at the named place of delivery on the date or within the period agreed to.

By agreeing to purchase *ex works*, the buyer is obligated to obtain any export license or other official authorization to carry out the export of the goods, although the seller is required to render, at the buyer's request, any assistance necessary to obtain any export license or other official authorization to carry out the export of the goods.

II. Routed Export Transactions Under The July 10, 2000, Federal Register Notice

Prior to July 10, 2000, there was sometimes a lack of understanding with respect to the legal responsibilities of parties to an export transaction. In a joint Federal Register publication, the United States Department of Commerce and the Bureau of Census and the former Bureau of Export Administration (now "BIS") clarified these roles and responsibilities.

In its final rule, BIS defines new terms, including "principal parties in interest" and "routed export transaction", and clarifies existing ones (notably the definition of "exporter"). BIS and the Census Bureau recognize "routed export transactions" as a subset of export transactions. A routed export transaction is

where the foreign principal party in interest authorizes a U.S. forwarding agent to facilitate the export of items from the United States. With respect to routed export transactions, the rule states:

In a "routed export transaction," the foreign principal party in interest agrees to terms of sale that may include assuming responsibility for export licensing. This rule provides that when the foreign principal party expressly assumes responsibility in writing for determining license requirements and obtaining necessary authorization, that foreign party must have a U.S. agent who becomes the "exporter" for export control purposes. Without such a written undertaking by the foreign principal, the U.S. principal is the exporter, with all attendant responsibilities.

According to Section 758.3 of the Export Administration Regulations:

The U.S. principal party in interest is the exporter, except in certain routed transactions. The exporter must determine licensing authority (License, License Exception, or NLR), and obtain the appropriate license or other authorization.

With respect to "routed transactions", however, the rules states:

(b) Routed export transactions. All provisions of the EAR, including the end-use and end-user controls found in part 744 of the EAR, and the General Prohibitions found in part 736 of the EAR, apply to routed export transactions. The U.S. principal party in interest is the exporter and must determine licensing authority (License, License Exception, or NLR), and obtain the appropriate license or other authorization, unless the U.S. principal party in interest obtains from the foreign principal party in interest a writing wherein the foreign principal party in interest expressly assumes responsibility for determining licensing requirements and obtaining license authority, making the U.S. agent of the foreign principal party in interest the exporter for EAR purposes.

BIS adopted a requirement of obtaining a separate writing to confirm that the foreign buyer has, in fact, accepted responsibility for the export clearance of the goods in a routed transaction, stating:

This [writing] is similar to the language that describes the buyer's responsibility for export licenses in the Incoterms 2000 publication. BIS's sample writing would be signed by the foreign principal

party in interest, and reads, "I undertake to determine any export license requirements, to obtain any export license or other official authorization, and to carry out any customs formalities for the export of the goods."

Therefore, by contractual agreement, if a foreign customer has agreed to an Ex Works transaction, it has agreed to accept responsibility to obtain any export license or other official authorization to carry out the export of the goods. Thus, the foreign customer is contractually required to provide the U.S. party with the required writing, and relieve the U.S. party of the legal requirements otherwise imposed upon it to act as exporter for the shipment.

III. Responsibilities of Parties in a Routed Export Transaction

Assuming the foreign customer follows through with its obligation to accept responsibility to export the goods, and issues the U.S. party the appropriate writing, what must be done next?

According to both the EAR and the FTSR, in a routed export transaction:

. . . where the foreign principal party in interest assumes responsibility for determining and obtaining licensing authority, the U.S. principal party in interest must, upon request, provide the foreign principal party in interest and its forwarding or other agent with the correct Export Control Classification Number (ECCN), or with sufficient technical information to determine classification.

At this point a distinction is drawn between the EAR and the Bureau of Census, Foreign Trade Statistical Regulations (FTSR). For purposes of preparing the SED the "exporter" will always be the U.S. principal party in interest, whether it is a routed transaction or not. This does not mean, however, that the U.S. principal party in interest is responsible for the SED.

According to Section 30.4 of the FTSR, the responsibilities of the parties in a routed export transaction are as follows:

In a routed export transaction where the foreign principal party in interest authorizes a U.S. forwarding or other agent to prepare and file the SED or AES record, the exporter (U.S. principal party in interest) must . . . provide such forwarding or other agent with the following information to assist in preparing the SED or AES record:

- i. Name and address of the U.S. principal party in interest;
- ii. U.S. principal party in interests, IRS, EIN;
- iii. Point of origin (State or FTZ);
- iv. Schedule B description of commodities;
- v. Domestic (D), foreign (F), or FMS (M) code;
- vi. Schedule B Number;
- vii. Quantity/unit of measure;
- viii. Value;
- ix. Upon request from the foreign principal party in interest or its agent, the Export Control Classification Number (ECCN) or sufficient technical information to determine the ECCN.

In a routed export transaction, the forwarding agent is responsible for:

1. Obtaining a power of attorney or written authorization from the foreign principal party in interest to prepare and file the SED or AES record on its behalf;
2. Preparing, signing, and filing the SED or AES record based on information obtained from the exporter (U.S. principal party in interest) or other parties involved in the transaction;
3. Maintaining documentation to support the information reported on the SED or AES record, and
4. Upon request by the exporter (USPPI), provide appropriate documentation to the exporter (USPPI) verifying that the information provided by the exporter (USPPI) was accurately reported on the SED or AES record.

It is important to understand that while the U.S. seller must always be listed as the USPPI on the

SED or AES record in a routed export transaction, it is not authorizing the forwarder to act on its behalf for the shipment. Rather, the forwarder's authority to prepare, sign, and file the SED or AES record is derived from the power of attorney or written authorization from the foreign principal party in interest to the forwarder.

Please feel free to contact us if you would like to know more about routed export transaction or the U.S. Export Administration Regulations. If you have questions on any of the issues raised in this article, please contact George R. Tuttle, III at (415) 288-0428 or via email at geo@tuttlelaw.com.

George R. Tuttle, III is an attorney 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.

Textile & Wearing Apparel Quotas End January 1, 2005

By Dan Kromat, PAEI Director

Textiles & wearing apparel from WTO countries will soon see the end of Quota and Visa requirements, however U.S. textile and wearing apparel manufacturers are putting up a good fight to delay the expected onslaught of imports.

The Committee for the Implementation of Textile Agreements (CITA) shocked the import community by issuing a directive to Customs to deny entry in January 2005 to any textile and apparel articles that were shipped over their quota limits for 2004. On the eve of a major change in practices regarding importing, CITA is basically stating that the date of export still prevails for Quota and Visa requirements for goods shipped to the United States. Apparently, without confirmation, many importers had expected that any goods from WTO countries, arriving in January 2005, would be allowed to clear without Quota and Visa. For these Quota and Visa required goods shipped in 2004, CITA will only allow 5% of each category's limits per month, beginning February 1, 2005, and 5% for each of the following months. This directive affects the following countries & categories: Bulgaria (435), china (326), India (all Group II, 340/640, 369S), Malaysia (435), Pakistan (347/348, 361, 369S, 666S, 360 & 666P), and Philippines 445/446). Three China

“safeguard” quotas (222, 349/649, 350/650) will not be allowed under the 5% scheme until January 24, 2005 and subsequent months. Go to Federal Register Dec 13, 2004 at <http://tinyurl.com/3jz9d>

The U.S. textile industry has filed a significant number of petitions with the government seeking the imposition of “safeguards” against Chinese textiles and apparel. These petitions amount to caps on imports into the U.S. Beijing agreed to allow such safeguards until 2008 under the terms of its entry into the WTO. Many of these petitions were filed in October 2004, well before any imports of subject goods were even manufactured. Apparently, CITA has 15 working days from the filing of a “safeguard” petition to decide whether a petition will be “considered” etc. If the petition is determined to provide the necessary information, CITA will publish a Federal Register notice announcing a public comment period of 30 calendar days. CITA will then make a determination within 60 calendar days of the close of the comment period as to whether it will request consultation with China or not. If consultation with China is commenced, China would in theory, limit its shipments of a category to a certain level, and the U.S. may also implement this limit as a Quota.

CITA determinations to accept “safeguard” requests for investigation of imports is available on the ITA web site (<http://www.ita.doc.gov/>). At this point, more than a dozen “safeguard” petitions have been filed for over twenty categories.

In an effort to avert what might be termed a trade war, China recently announced it would impose tariffs on some textile and apparel exports. Information regarding the level of export taxes or which textiles would be taxed has not yet been released. It was also announced that the goal of the tariffs would be to encourage Chinese producers to manufacture higher-end textiles and apparel instead of selling a full range.

There is likely to be a lot of new information in the next two weeks as we approach the January 1, 2005 start up date, and importers would do well to regularly check the ITA and Customs (<http://www.ita.doc.gov/> & <http://www.cbp.gov/>) web sites, and other news sources.

This article prepared by Dan Kromat, Manager Customs Compliance, a Licensed Broker working for KSI Corporation in South San Francisco, CA. He can be reached at dan.kromat@ksicorp.com, or 650-228-7155.

Customs Rules That The Value of An Assist Must Include Royalty

By George R. Tuttle, III

(this article first appeared in the November 5, 2004 Tuttle Law Offices Newsletter)

U.S. Customs & Border Protection (Customs) recently issued a ruling (**HQ548568**, dated October 19, 2004), wherein it concluded that the **value of an assist** must include payments to third parties for any royalties, licenses or patent fees, when those payments relate to the right to exercise design, manufacture, or process technology embodied in the assist.

The ruling concerned how an importer should determine the value of a semiconductor wafer that is manufactured in the United States and consigned to a foreign assembler, free of charge, for assembly into a finished integrated circuit. The finished device will then be exported back to the United States and other third countries.

According to the ruling, the U.S. manufacturer produces the wafers using technical design, manufacturing, and process rights obtained through a licensing agreement with a third party. In exchange for the design, manufacturing, and process rights, the Importer pays the third party a license fee. The importer inquired whether the license fee payments for design, manufacturing, and process rights should be included in the valuation of the assist, for customs valuation purposes.

In confirming that license fee payments for design, manufacturing, and process rights are part of the value of an assist, Customs said that the term “assist” refers to a statutorily enumerated good or service that is supplied . . . by the buyer free of charge or at a reduced cost, for use in connection with the production or sale for export of the imported merchandise. It then said that the type of assist at issue in the case was the wafer, which belongs in the category of materials, components, parts, and similar items incorporated in the imported merchandise.

Citing 19 C.F.R. 152,103(d)(1), Customs said that the value of an assist is its cost of acquisition, or, if the assist is produced by the buyer or a party related to the

buyer, its value would be its cost of production, plus the transportation cost to the place of production.

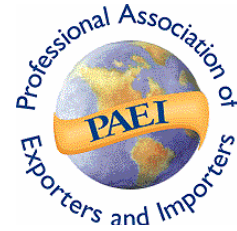
Citing HQ ruling 544192, dated June 16, 1989 (which held that the cost of production of an assist includes design and development costs, regardless of whether incurred within or outside the U.S.), Customs held in **HQ548568** that the license fees paid by the importer to the 3rd party, in return for the right to use the technical know-how to produce the assist in the U.S., is a part of the value of that assist. It concluded that “accordingly, the value of the assist includes the amount of the license fees paid . . . regardless of how the importer treats the license fees on its books”, and, therefore, must be reported as a part of the total price paid or payable for the imported devices.

Commentary on Customs Ruling HQ548568 And The Treatment of Royalties, License Fee & Patent fee Payments

Payments to third parties for royalties, licenses, or patent fees for the right to make use of design, manufacture, or process technology is commonplace in today's business environment. These costs, however, are almost universally overlooked by importers when declaring the Customs value of goods, which incorporate materials, parts, and components that were made using this purchased technology. This is particularly true in the computer, electronics, and integrated circuit manufacturing industry. It also has considerable relevancy in the biotechnology, pharmaceutical, and medical instrument industries. As a general rule, these costs are not normally included in intercompany transfer prices, and, therefore, like reticles, NRE expenses and tooling costs, represent a potential undervaluation of imported merchandise.

If you have questions on any of the issues raised in this article, please contact George R. Tuttle, III at (415) 288-0428 or via email at geo@tuttlelaw.com.

George R. Tuttle, III is an attorney 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.



**The Bureau of Industry and Security
and
The Professional Association of Exporters and Importers
are proud to offer:**

“Complying with U.S. Export Controls”

January 25 - 26, 2005

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 BIS’s professional counseling staff and covers the information you need to know to comply with U.S. export control requirements on commercial exports. 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.

The Western Regional Office of the Department of Commerce, Bureau of Industry and Security is a State Bar of California approved MCLE provider. This course is worth 12 hours of MCLE credit. 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.

ACCOMODATIONS

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 Suites.

QUESTIONS?

For more information on the details of the program, please call BIS at (949) 660-0144, or (408) 998-7402 or PAEI (408) 532-PAEI (7234) or email at khebertdms@paei.org. You may also visit the web sites of PAEI <http://www.paei.org/> or BIS <http://www.bis.doc.gov/> for more information.

REGISTRATION No telephone or fax reservations please.

Advance registration is required for the Seminar and space is limited. Breakfast, lunch, coffee breaks, and training materials will be provided. No refunds for cancellations made after Tuesday, January 18, 2005. A confirmation email will be sent to all paid registrants to verify that their registration is complete.

You may register for this seminar and pay by credit card in a secure environment on PAEI's web site at <http://www.paei.org/>. We accept Visa/AMX/Mastercard only through the PAEI web site.

Online registration must include the name of the attendee and their email address.

To pay by check, please send your check (payable to the Professional Association of Exporters and Importers, PAEI) in the amount of **\$295** to PO Box 612743, San Jose, CA 95161-2743.

PAEI's Tax ID Number is 680117035. All registrations must be postmarked no later than Friday, January 14, 2005.

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) Membership Number: _____



WATCH US GROW!

June 2004

Renew

Deborah Mannia IPC Print Services, Inc
Amy Chang Chang's Enterprises

July 2004

New

Darlene Shaffer Vishay Siliconix
John Brown EXAR Corporation
Gary Ramos EXAR Corporation
Chris Daniels Align Technology, Inc
Archibong J Ituh Nuance Communications
Brittany Whiting Silicon Valley CITD

Renew

Sharon Jones Philips ADAC
Nancy Heider Redback Networks, Inc
Colleen Allgeyer Vishay Siliconix

August 2004

New

Ruth Baratta Shaklee Corporation

Renew

Jim Harrington Infineon Technologies
Mike Boucher Infineon Technologies
Sean McCormick Summit Global Partners
Dorothy Nowak

Maria Legaspi LSI Logic
Lieu Pham-Nguyen LSI Logic
Fatima Guadamuz-Cabral LSI Logic
Sharon Ma LSI Logic
Ross Martin IDT
Pat Toich IDT
Linda Mills Jet Propulsion Lab
Susan Leavitt Geometrics Inc

September 2004

New

Ray T. Hirata Hitachi Global Storage
Barry Conklin Hitachi Global Storage
Carole Herron Cisco Systems
Jan Jarvis Pelco
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Darrell Ortiz CDM Software Solutions

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Amy Hamilton Cisco Systems
Helen King Symantec Corporation
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Jasbir Banwait

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William J Jaynes Edo RSS
Steven Kott Complete Compliance Solutions
Steve Shay Novellus Systems
Mary Clites Quoin International Inc

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Patricia Kita	Ditech Communications
Elizabeth K Lally	Secure Computing Corp.
Mary Budge	Secure Computing Corp.
Sergio Retamal	Cost Plus World Market
Steven Fisher	Kendall-Jackson Wine Estates
Lori Pagan	Ultratech Corp.
Cindy Patterson	Ultratech Corp.
Kelly Raia	American River Int'l
Neil Lenok	American River Int'l

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Joannie Montagne	
Edjie Lewis	Hewlett Packard
Kivi J Walonen	Varian Medical Systems, Inc
Loree Stevens	Symmetricom, Inc
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Cynthia Hall	
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Matthew Panos Ellis	Cosco Shipping
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Sharon McGlynn	Inkra Networks
Robert Kearsley	PriceWaterhouseCoopers
Pamela Harbell	Renesas Technology Americas
Lewis Facundo	Renesas Technology Americas
Jane Watkins	Varian, Inc
Loren R Sorensen	Sorensen Consultants
J. Dixon Reilley	Reilley & Associates
Bill White	White Consulting
Surya Dhamija	Air 7 Seas Transportation
Sharon Kolstad	Atmel Corp.
Gieselle Perez	Atmel Corp.
Jean Stein	Hitachi Data Storage Software
John DiGirolamo	Hitachi Storage Software
Jo-Anne Daniels	Trade Resources & Associates

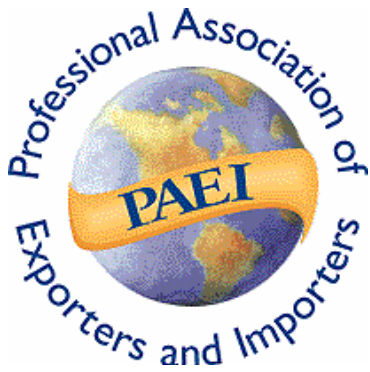
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