

Continued

unified export license policy.

The Proposed Rule is now subject to a public review and comment period. No indication has been given thus far as to when the final rule on this subject would be published. The Obama Administration strongly encourages businesses subject to U.S. export controls to review the Proposed Rule closely, test how it would work on the products, services and technology they export, and prepare thoughtful comments and suggestions for consideration by the BIS on the Potential Transfer Items as well as other aspects of the Proposed Rule.

Miller Canfield stands ready to assist with: (i) construing the impact of the Proposed Rule upon your business and your export control compliance program and (ii) developing public comments on the Proposed Rule for submittal to the BIS.

For further information please contact Miller Canfield's Export Control Team. Visit our Export Control webpage at millercanfield.com/exportcontrols for prior articles and alerts, as well as subsequent updates on Export Control Reform.

Joseph D. Gustavus

+1.248.267.3317

gustavus@millercanfield.com