EAR (15 CFR 730–774) & ECCN 9A515/9E515 Supplier Determinations

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Verification & Authority Baseline: Binding US federal law (15 CFR Parts 730–774, Bureau of Industry and Security). Commercial spacecraft and related items (including Non-Earth Imaging / NDS carve-outs) fall under ECCN 9A515/9E515 rather than ITAR. Suppliers are asked for formal ECCN classifications on quotes and packing slips.



ECCN	Scope	Typical WA Space Item
9A515	Commercial spacecraft & related commodities	Commercial satellite buses, antennas, NDS hardware
9D515 / 9E515	Software & technology for 9A515 items	Flight/ground telemetry SW, CAD/build packages
EAR99	Low-tech commercial off-the-shelf items	Standard brackets, unspecialized shop supplies

Who Issues This Ask, Authority, and Binding Status

Commercial satellite and ground-system primes—such as Amazon Leo, SpaceX (Starlink), BlackSky, and Kymeta—routinely ask WA suppliers to state the **Export Control Classification Number (ECCN)** on quotes, POs, and commercial invoices.

Binding status: The Export Administration Regulations (`15 CFR Parts 730–774`, BIS) are **binding US federal law**. Commercial spacecraft, ground-station hardware, and non-USML space components typically fall under **ECCN 9A515** (hardware), **9D515** (software), or **9E515** (technology).

Evidence Required & Small-Supplier Effort Cost

Suppliers provide a written **Export Classification Statement** (ECCN or EAR99 determination) backed by Order of Review analysis against `15 CFR Part 774`—or a BIS **CCATS** (Commodity Classification Automated Tracking System) ruling if classification is ambiguous.

BIS does not charge a filing fee for CCATS submissions in SNAP-R; outside trade-counsel review costs are **not in our data**.

WA Space Cluster Segments & Companies Affected

Affects commercial hardware and software vendors in Satellite Manufacturing, Ground Systems & SATCOM, and In-Space Servicing (e.g., NASA Docking System `9A515.a.4` carve-outs).

Verified Primary Sources & Internal Bridges

• eCFR — 15 CFR Part 774 (Commerce Control List / ECCN 9A515): https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-774

• eCFR — 22 CFR Part 120 (ITAR): https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-120