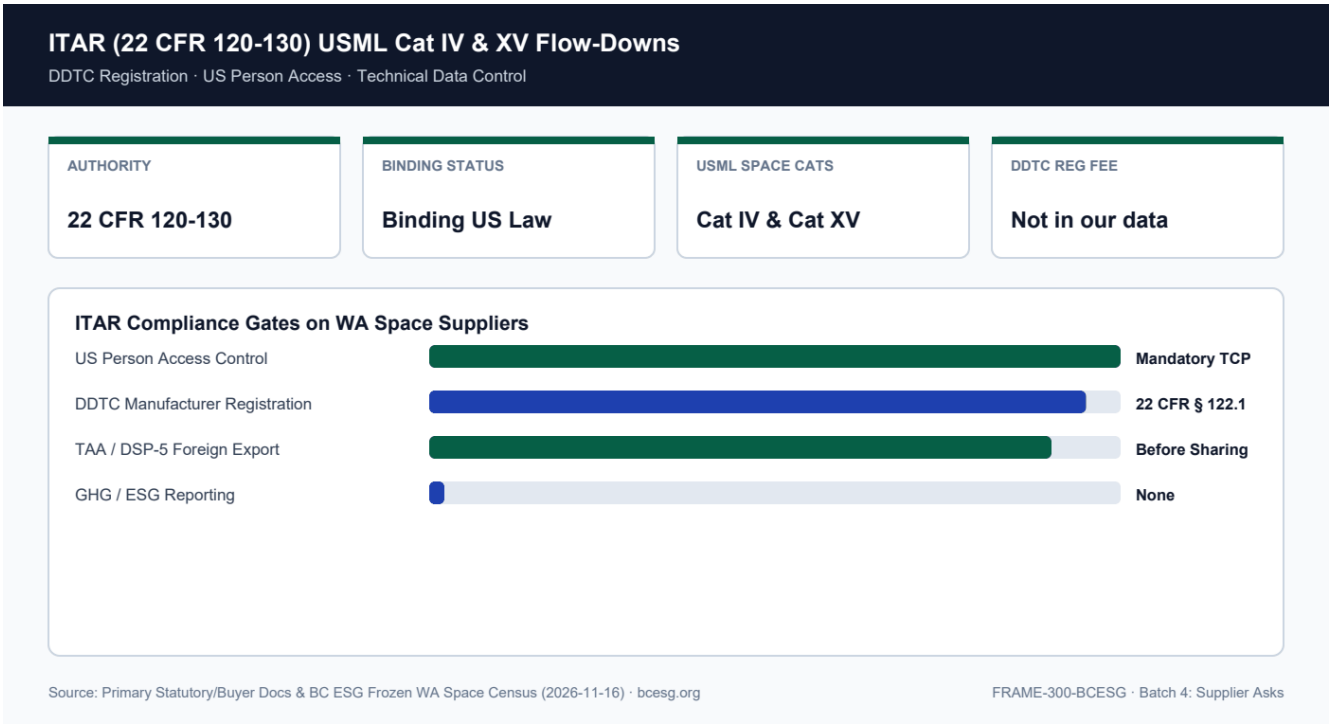
ITAR (22 CFR 120–130) & USML Category IV/XV Supplier Flow-Downs

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Verification & Authority Baseline: Binding US federal law (22 CFR Parts 120–130, DDTC). Governs launch vehicles (USML Cat IV) and spacecraft/servicing (USML Cat XV). Requires DDTC registration for manufacturers/exporters, strict US Person access controls, and export licenses for foreign persons.



ITAR Requirement	CFR Citation	Supplier Proof
Manufacturer Registration	22 CFR § 122.1	Active DDTC Registration Letter
US Person Access Control	22 CFR § 120.62	Written Technology Control Plan (TCP) + I-9/citizenship check
Cloud / Email Storage	22 CFR § 120.54	FIPS 140-2/3 end-to-end encryption (US servers)

Who Issues This Ask, Authority, and Binding Status

ITAR compliance letters and technical-data flow-downs are issued by every WA launch, propulsion, and defense-space prime—including Blue Origin, SpaceX, Stoke Space, Aerojet Rocketdyne, and Starfish Space.

Binding status: ITAR (`22 CFR Parts 120–130`, Directorate of Defense Trade Controls) is **binding US federal law** regardless of contract size. Any US manufacturer of USML Category IV (launch/propulsion) or Category XV (spacecraft/RPO servicing) defense articles must register with DDTC (`22 CFR § 122.1`) even if it never exports.

Evidence Required & Small-Supplier Effort Cost

Primes require a signed **ITAR / US Person Compliance Representation**, proof of active **DDTC registration** (if manufacturing defense articles), a **Technology Control Plan (TCP)**, and badge/network segregation preventing foreign-person access to ITAR CAD/drawings.

Current DDTC registration tier fees and outside export-counsel costs are **not in our data**.

WA Space Cluster Segments & Companies Affected

Applies across Launch, Propulsion, In-Space Servicing, and Software & Mission Services (M42 Space Engineering).

Verified Primary Sources & Internal Bridges

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

• eCFR — 22 CFR § 121.1 (USML Categories IV & XV):
https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M/part-121/subject-group-ECFRf7e5fe639be4566/section-121.1