ITAR & EAR Physical Transit Custody: Chain-of-Custody When Trucks Detour or Stage Overnight

Pillar: Space Hardware | **Basis:** Federal Regulation (22 CFR) | **Primary Source:** U.S. Dept. of State DDTC (22 CFR) / BIS | **As Of:** 2026-11-16

When a flood closure on SR 167 or a chain ban on Snoqualmie Pass forces an ITAR-controlled spacecraft or propulsion assembly to stage overnight, physical custody, U.S.-person escort, and bonded-yard security remain mandatory.

Operational Continuity & Corridor Facts

• ITAR (22 CFR Parts 120–130) and EAR 9A515/9E515 controls govern not only digital drawings, but physical custody and export-controlled hardware in transit.

• If I-90 Snoqualmie Pass closes or SR 167 floods, drivers hauling USML Category IV/XV hardware cannot leave unguarded trailers at public rest stops.

• Ocean or air imports/exports through NWSA or SEA require pre-cleared customs brokers to prevent unmonitored terminal dwell.

Transit Disruption ITAR/EAR Custody Checklist

Scenario	Custody Risk	Required Control
Snoqualmie Pass Hold	Unsecured overnight trailer	Pre-contracted gated/badged staging yard
SR 167 Flood Reroute	Driver swap / carrier handoff	U.S.-person verification + tamper seals
SEA / NWSA Terminal Dwell	Misrouted or unguarded freight	Designated ITAR-capable customs broker

Corridor Exposure, Triggers & Facility Actions

- Include flood and mountain-pass staging protocols in every carrier Statement of Work for USML/9A515 hardware.
- Require dual-driver teams or GPS-monitored sealed vans for high-value flight hardware.
- Coordinate with Export-Control Officer (#2070) before authorizing emergency third-party cross-docking.

Cross-Cluster Links & Primary Sources

- **WA Space Cluster Hub (#1382):** https://bcesg.org/washington-space-cluster-census/
- **Supply-Chain & Procurement Desk Brief:** https://bcesg.org/wa-space-role-procurement-lead-desk-brief/
- **Program Manager Desk Brief:** https://bcesg.org/wa-space-role-program-manager-desk-brief/
- **Satellite Mfg Continuity Exposure:** https://bcesg.org/wa-satellite-manufacturing-continuity-exposure/
- **In-Space Servicing Continuity Exposure:** https://bcesg.org/wa-in-space-servicing-continuity-exposure/
- **22 CFR Subchapter M (ITAR):** https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M
- **Port of Seattle SEA Air Cargo:** https://www.portseattle.org/sea/air-cargo
- **NWSA Cargo Statistics (2025 TEUs):** https://www.nwseaportalliance.com/about-us/cargo-statistics

Provenance Note: Export-control framework per 22 CFR Subchapter M (ITAR); links to BC ESG Batch 6 Export-Control briefs (#2070, #2073).