Export Control & Cyber Readiness: ITAR, EAR 9A515, DFARS 7012 & CMMC 2.0

Pillar: Supplier-Ask & Audit Readiness | **Basis:** Batch 4/5/6 Export & Cyber Corpus | **Primary Source:** DDTC (22 CFR 120-130) / BIS / DoD (48 CFR 252) | **As Of:** 2026-11-16

Unlike withdrawn federal climate proposals, export controls (ITAR, EAR 9A515) and defense cyber mandates (DFARS 252.204-7012, NIST SP 800-171, CMMC 2.0) are live pre-award gates for Washington space suppliers.

Readiness Checklist & Corpus Traceability

• **ITAR Jurisdiction & Registration:** Verify DDTC registration and flow-downs per ITAR 22 CFR 120-130 Flowdowns and ITAR LIVE.

• **EAR 9A515 Classification:** Document ECCN determinations for commercial spacecraft parts per EAR 9A515 ECCN Classification and EAR 9A515 LIVE.

• **DFARS 7012 & NIST SP 800-171:** Maintain SPRS score, SSP, and POA&M per DFARS 7012 & NIST 800-171 and DFARS 7012 LIVE.

• **CMMC 2.0 & FIPS 140 Cloud:** Track phased CMMC 2.0 DFARS 7021 (CMMC Phase 2 Partial) and ITAR Cloud FIPS 140.

Export Control & Cyber Readiness Checklist

Mandate / Ask	Readiness Deliverable	Corpus Source
ITAR 22 CFR 120-130	Active DDTC registration & TCP / badging	#1972 ITAR LIVE
EAR 9A515	Written ECCN matrix & STA/license check	#1975 EAR LIVE
DFARS 7012 / 800-171	Current SPRS score, SSP & incident reporting	#1978 DFARS LIVE
CMMC 2.0 (7021)	Level 1/2 readiness aligned to phase-in	#1954 CMMC Partial
ITAR Cloud / SBOM	FIPS 140-validated cloud + EO 14028 SBOM	#1852 FIPS 140

Operator Execution & Boundary Notes

• Coordinate Export-Control Officer (Export-Control Desk Brief) with Compliance Lead (DFARS 7012 & CMMC) before uploading CAD/drawings to commercial clouds.

• Note that OMB M-22-18 Attestation is marked DEAD/superseded, while prime EO 14028 SBOM software asks remain active in contracts.

• Audit physical facility badging for deemed exports alongside HR onboarding.

Corpus Source Pieces & Primary Authorities

• **ITAR (22 CFR 120-130) LIVE:** https://bcesg.org/wa-space-rule-itar-22-cfr-120-130-live/

• **DFARS 7012 & NIST 800-171 LIVE:** https://bcesg.org/wa-space-rule-dfars-7012-nist-800-171-live/

• **CMMC 2.0 Phase 2 (Partial):** https://bcesg.org/wa-space-rule-cmmc-2-0-phase-2-partial/

• **Export-Control Desk Brief:** https://bcesg.org/wa-space-role-export-control-desk-brief/

• **Compliance: DFARS 7012 & CMMC:** https://bcesg.org/wa-space-role-compliance-dfars-7012-cmmc/

• **22 CFR Subchapter M (ITAR, eCFR):** https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M

• **15 CFR Part 774 (EAR CCL, eCFR):** https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-774

• **48 CFR Part 252 (DFARS, eCFR):** https://www.ecfr.gov/current/title-48/chapter-2/subchapter-H/part-252

Provenance Note: Synthesized from BC ESG Batch 4 (#1840–#1855), Batch 5 (#1945, #1954, #1972–#1978), and Batch 6 (#2049, #2070–#2076).