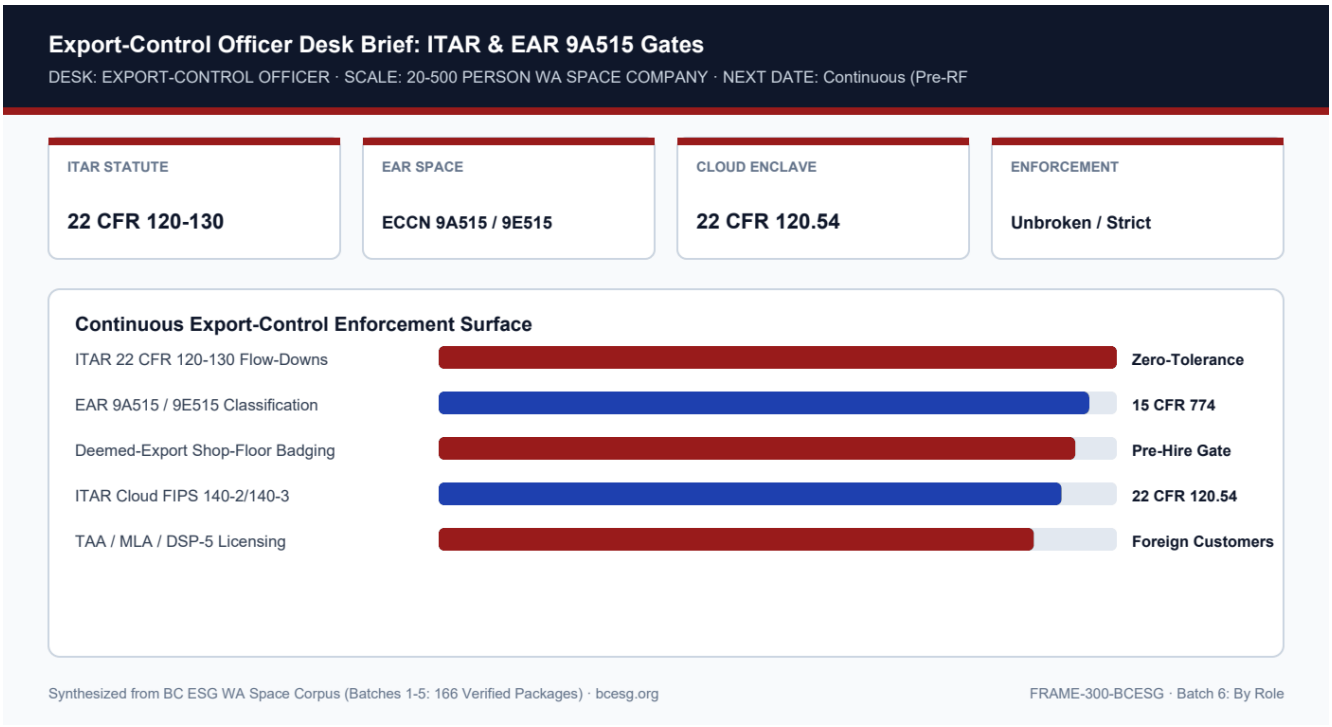
Export-Control Officer Desk Brief: ITAR, EAR 9A515 & Shop-Floor Deemed Exports

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Role: Export-Control Officer | **Top Live Mandate:** ITAR (22 CFR 120-130), EAR 9A515/9E515 & ITAR Cloud FIPS 140 | **Dead Rule to Ignore:** Climate Rule Withdrawals (Zero Impact on Export Law) | **Next Deadline:** Continuous (Pre-RFQ, Pre-Hire & Annual DDTC Reg.)

Desk Summary: ITAR and EAR ECCN 9A515 never paused. At a 20–500-person WA space company, the Export-Control Officer (often wearing the Empowered Official hat) gates every RFQ drawing, foreign-person hire, and cloud engineering enclave.



Regime	Status	Trigger / Cadence	Instrument
ITAR (USML Cat IV/XV)	LIVE	Continuous + Annual DDTC Registration	22 U.S.C. § 2778 / 22 CFR 120–130
EAR Space (9A515 / 9E515)	LIVE	Continuous (prior to export/deemed export)	50 U.S.C. § 4801 / 15 CFR 774
ITAR Cloud Carve-Out	LIVE	Continuous (E2E FIPS 140-2/140-3)	22 CFR 120.54

1. What Arrives on This Desk (Live Asks & Rules)

Every WA space segment—from Launch and Propulsion to Satellite Manufacturing and In-Space Servicing—operates under continuous ITAR (22 CFR 120–130) and EAR ECCN 9A515/9E515 enforcement.

On a daily basis, this desk handles prime ITAR flow-downs, EAR 9A515 jurisdiction/classification, and ITAR cloud FIPS 140-2/140-3 encryption carve-outs.

2. What Is Dead or Enjoined and Can Be Ignored

Nothing in export control died or was enjoined. Federal climate withdrawals (FAR 2021-015, SEC) and the CMMC Phase 2 pause have zero effect on ITAR/EAR criminal and civil liability.

3. What Carries a Date (Deadlines & Instruments)

Continuous statutory instruments on the Export-Control desk:

Corpus References & Cross-Role Links

- Export-Control Duty: ITAR & EAR Flow-Downs: https://bcesg.org/wa-space-role-export-itar-ear-flowdowns/
- Export-Control Duty: ITAR Cloud & FIPS 140: https://bcesg.org/wa-space-role-export-itar-cloud-fips-140/
- ITAR 22 CFR 120-130 (LIVE): https://bcesg.org/wa-space-rule-itar-22-cfr-120-130-live/
- EAR ECCN 9A515 (LIVE): https://bcesg.org/wa-space-rule-ear-9a515-eccn-live/
- ITAR Cloud FIPS 140 Carve-Out: https://bcesg.org/wa-space-ask-itar-cloud-fips-140-carveout/