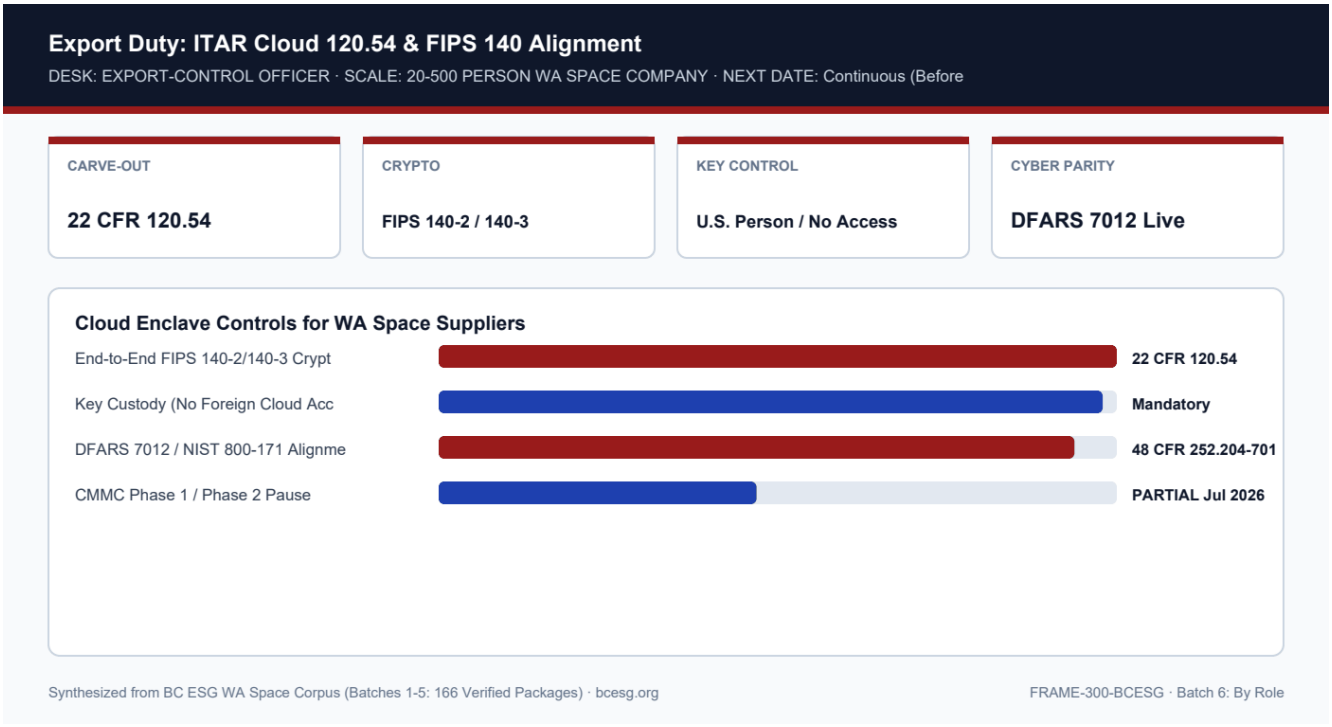
Export-Control Duty: ITAR Cloud Storage, FIPS 140 Validation & DFARS 7012 Alignment

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Role: Export-Control Officer | **Top Live Mandate:** 22 CFR 120.54 E2E FIPS 140-2/140-3 & DFARS 7012 | **Dead Rule to Ignore:** OMB M-22-18 Blanket Software Attestation | **Next Deadline:** Continuous (Before Uploading ITAR Data to Cloud)

Desk Summary: Using cloud CAD, PLM, or ERP for ITAR technical data requires satisfying the 22 CFR 120.54 end-to-end FIPS 140-2/140-3 encryption carve-out (or US-person-only GovCloud), aligned with DFARS 252.204-7012.



Control	Status	Requirement	Instrument
ITAR Cloud Carve-Out	LIVE	E2E encryption + FIPS 140-2/140-3 + key control	22 CFR 120.54
DFARS 252.204-7012	LIVE	110 NIST 800-171 controls + 72-hr report	48 CFR 252.204-7012
CMMC 2.0 Phase 2	PARTIAL	Phase 2 C3PAO paused Jul 2026	32 CFR Part 170

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

Modern Software & Mission Services and engineering teams rely on cloud PLM/CAD, triggering ITAR Cloud FIPS 140-2/140-3 carve-out checks under 22 CFR 120.54 alongside DFARS 252.204-7012.

2. What Is Dead or Enjoined and Can Be Ignored

Ignore OMB M-22-18 blanket forms (rescinded Jan 2026), and note that CMMC Phase 2 is paused—neither relaxes 22 CFR 120.54 or DFARS 7012.

3. What Carries a Date (Deadlines & Instruments)

Cloud encryption and cyber instruments:

Corpus References & Cross-Role Links

- Export-Control Desk Brief (Overview): https://bcesg.org/wa-space-role-export-control-desk-brief/
- ITAR Cloud & FIPS 140 Carve-Out: https://bcesg.org/wa-space-ask-itar-cloud-fips-140-carveout/
- DFARS 7012 / NIST 800-171 (LIVE): https://bcesg.org/wa-space-rule-dfars-7012-nist-800-171-live/
- CMMC 2.0 Phase 2 Pause (PARTIAL): https://bcesg.org/wa-space-rule-cmmc-2-0-phase-2-partial/