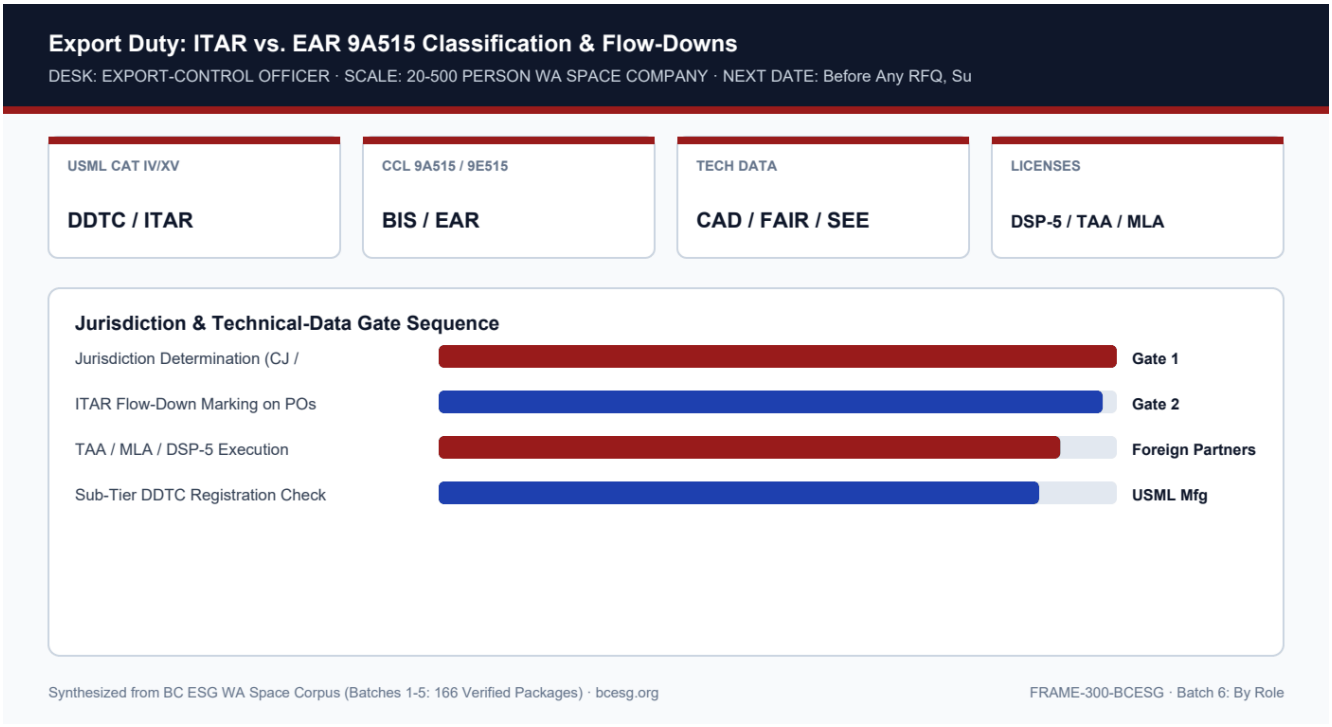
Export-Control Duty: Managing ITAR Flow-Downs, EAR 9A515 Classification & Tech Data

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Role: Export-Control Officer | **Top Live Mandate:** USML Cat IV/XV vs. ECCN 9A515 Classification & TAA/DSP-5 | **Dead Rule to Ignore:** Non-Export Climate Withdrawals | **Next Deadline:** Before Any RFQ, Sub-Tier PO or Foreign Transfer

Desk Summary: Misclassifying a spacecraft bracket or propulsion valve between USML Category IV/XV (ITAR) and ECCN 9A515 (EAR) is a top audit failure at WA space suppliers.



Instrument	Status	Trigger	Authority
22 CFR 120–130 (USML Cat IV/XV)	LIVE	Pre-RFQ / Pre-export / Annual DDTC	State Dept. DDTC
15 CFR 774 (ECCN 9A515 / 9E515)	LIVE	Pre-export / Deemed export	Commerce BIS

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

Primes flow down ITAR 22 CFR 120–130 clauses and EAR ECCN 9A515/9E515 classification requests on every hardware, propulsion, and satellite program. Under ITAR and EAR 9A515, every drawing, STEP file, FAIR packet, and SEE test report must be tagged with its exact jurisdiction before leaving the building.

2. What Is Dead or Enjoined and Can Be Ignored

No export-control classification rule has been stayed or withdrawn.

3. What Carries a Date (Deadlines & Instruments)

Active classification and licensing instruments:

Corpus References & Cross-Role Links

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

- ITAR 22 CFR 120-130 Flow-Downs: https://bcesg.org/wa-space-ask-itar-22-cfr-120-130-flowdowns/
- EAR 9A515 Classification: https://bcesg.org/wa-space-ask-ear-9a515-eccn-classification/
- 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/