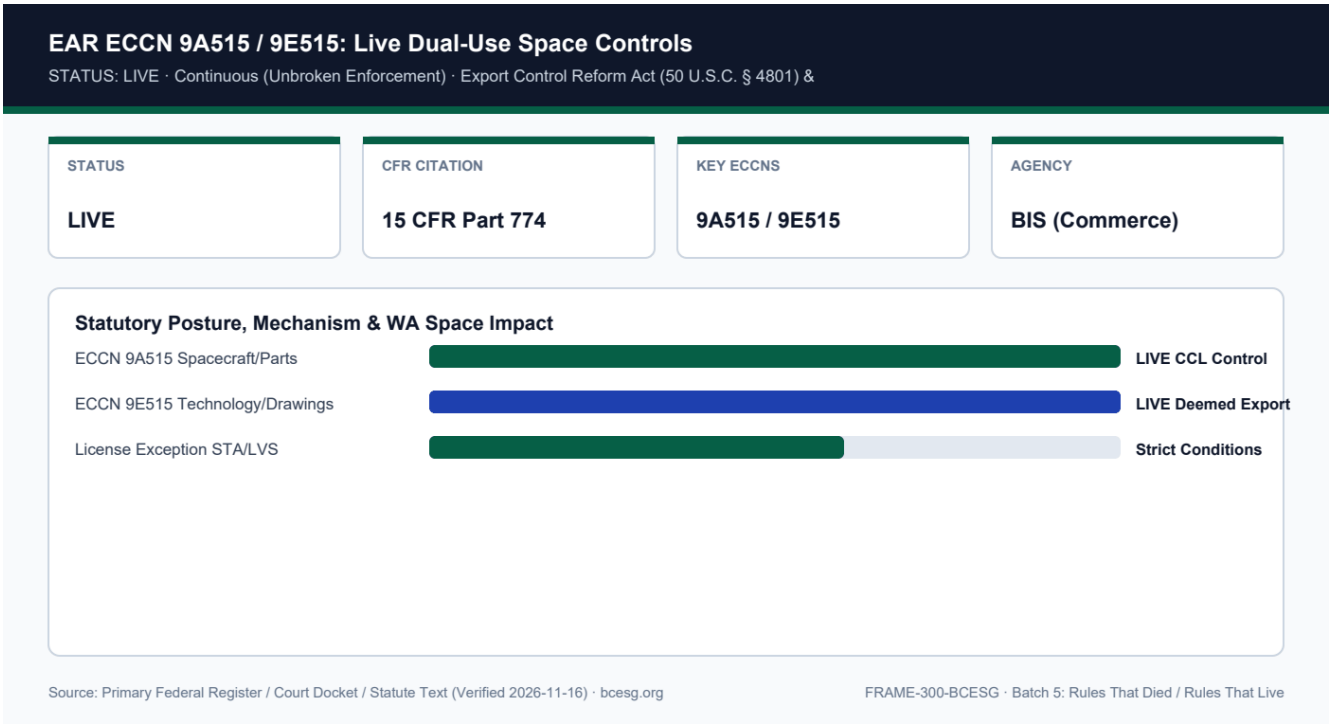
BC ESG · RULES THAT DIED / RULES THAT LIVE · STATUS: LIVE

EAR Spacecraft & Dual-Use Controls (15 CFR Part 774 / ECCN 9A515): LIVE — Unbroken BIS Enforcement

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Rule: Export Administration Regulations (EAR, 15 CFR Parts 730–774) — ECCN 9A515 / 9E515 | **Status:** LIVE | **Instrument:** Export Control Reform Act (50 U.S.C. § 4801) & 15 CFR Part 774 (CCL) | **Date:** Continuous (Unbroken Enforcement)

Verdict & Proof: EAR dual-use space controls (15 CFR Parts 730–774, ECCN 9A515/9E515) are LIVE. Commercial satellites, ground-system electronics, and spacecraft components moved off the USML remain tightly controlled by BIS under the Commerce Control List with zero pause.



ECCN	Scope	Status
9A515	Commercial spacecraft, buses, & specially designed parts	LIVE — BIS CCL control
9D515 / 9E515	Software & technology for 9A515 items	LIVE — Deemed export rules apply
EAR99	Low-tier commercial off-the-shelf items	LIVE — End-user/sanctions screening

Who Owes What by When: ECCN Classification & Deemed Exports

Even when a commercial satellite component or ground-station transceiver is not ITAR-controlled, it is typically controlled under BIS Export Administration Regulations (15 CFR Parts 730–774), most commonly ECCN 9A515 (spacecraft and related commodities) and 9E515 (technology).

Washington suppliers must maintain documented jurisdiction/classification determinations (CJ or self-classification) and screen foreign-national access and export destinations continuously.

Batch 4 vs. Batch 5 Scope

Batch 4 covered customer ECCN 9A515 classification asks; this Batch 5 brief confirms the statutory and regulatory status of 15 CFR Part 774.

Verified Primary Sources & Internal Bridges

• eCFR 15 CFR Part 774 (Commerce Control List):
https://www.ecfr.gov/current/title-15/subtitle-B/chapter-VII/subchapter-C/part-774