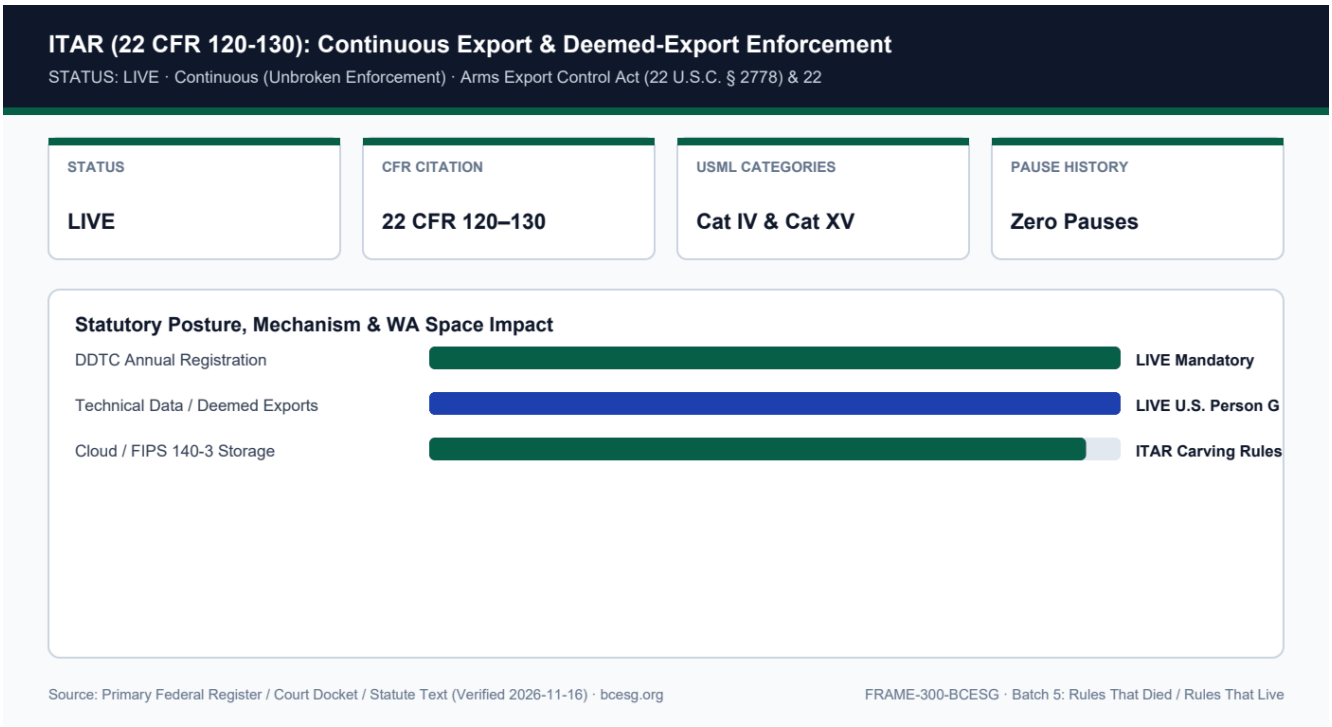
ITAR (22 CFR Parts 120–130): LIVE — The Compliance Regime That Never Paused

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Rule: International Traffic in Arms Regulations (ITAR, 22 CFR Parts 120–130) | **Status:** LIVE | **Instrument:** Arms Export Control Act (22 U.S.C. § 2778) & 22 CFR Parts 120–130 | **Date:** Continuous (Unbroken Enforcement)

Verdict & Proof: ITAR (22 CFR Parts 120–130) is LIVE and unbroken. Regardless of federal climate-rule withdrawals, DDTC registration, USML Category IV (launch vehicles) and Category XV (spacecraft) technical-data controls, and U.S. Person access restrictions remain strictly enforced across every Washington space supplier.



ITAR Control	Governing Section	Status
Manufacturer / Exporter Registration	22 CFR Part 122	LIVE — Annual DDTC renewal
USML Cat IV & Cat XV Articles	22 CFR § 121.1	LIVE — License/TAA required for export
Technical Data & Deemed Exports	22 CFR § 120.50 / § 120.33	LIVE — U.S. Person access only

Who Owes What by When: Continuous DDTC & Prime Flow-Downs

While federal climate and ESG rules were withdrawn or enjoined in 2025–2026, ITAR (22 CFR Parts 120–130) never paused. Any Washington manufacturer, machine shop, propulsion tester, or software vendor touching USML Category IV (launch vehicles/rockets) or Category XV (spacecraft/associated equipment) defense articles or technical data must maintain active DDTC registration and strict U.S. Person access controls.

Deemed exports—allowing a non-U.S. person in Kent, Redmond, or Seattle to view a CAD drawing or test report—carry civil and criminal penalties under the Arms Export Control Act.

Batch 4 vs. Batch 5 Scope

Batch 4 detailed how primes flow ITAR clauses into POs; this Batch 5 brief documents ITAR's unbroken statutory standing under 22 U.S.C. § 2778 and 22 CFR Parts 120–130.

Verified Primary Sources & Internal Bridges

• eCFR Title 22 Subchapter M (ITAR, 22 CFR 120–130): https://www.ecfr.gov/current/title-22/chapter-I/subchapter-M