

June 27, 2014

Via E-Mail (DDTCResponseTeam@state.gov)

Directorate of Defense Trade Controls
Office of Defense Trade Controls Policy
U.S. Department of State
PM/DDTC, SA-1, 12th Floor
Washington, DC 20522-0112



ATTN: Regulatory Change, USML Category XV

RIN: 1400-AD33

The Commercial Spaceflight Federation (CSF) is an industry association comprised of leading businesses and organizations working to make commercial spaceflight a reality. Our mission is to promote the development of commercial spaceflight, pursue ever higher levels of safety, and share best practices and expertise throughout the industry. The CSF commends the Administration for its efforts on export control reform, especially in relation to Category XV, which will reinforce the competitiveness of the U.S. satellite industry in the global market. The modernization of Category XV will help bolster the growth of the domestic commercial space sector while enhancing national security by allowing the government to focus its scarce resources on sensitive military technologies.

While we applaud the progress that has been made, there is still more work to be done. As commercial space companies continue to test and develop their vehicles, it is vital to have an export control regime that will not illegitimately inhibit the potential of this growing industry. Steps should be taken to further investigate how to modernize the USML to appropriately move these vehicles to the Commerce Control List (CCL). Again, the CSF commends the State Department on its export control reform efforts to date as well as its outreach to industry, and we hope to continue to work together to determine the appropriate controls for commercial spacecraft.

Although the State Department did not request comment on this matter in its May 13, 2014 rule, the CSF will submit further detailed comments to the State Department along with our submission to the Department of Commerce in response to their request for comments on the continued application of USML controls to commercial space launch vehicles and human spaceflight.

Sincerely,



Michael Lopez-Alegria

President