

Justification for non-substantive change request.

1405-0173 Request to change end user, end use, and/or destination of hardware

Summary

DDTC requests to amend 1405-0173, *Request to change end user, end use, and/or destination of hardware*. Currently, respondents are instructed by the collection's supporting statement to submit information in accordance with 22 CFR § 123.9. In addition to the requirements listed in that section, § 123.9 directs respondents to also submit information in accordance with §123.1, which includes the requirements set forth by § 126.13 and part 130. DDTC wishes to provide industry the opportunity to respond to this collection electronically via DDTC's new case management system. This system, which will be accessed through DDTC's website, will allow industry to submit information securely through the internet, thus eliminating the need for third party delivery. DDTC has developed form DS-6004 to electronically capture the information required by DDTC to process requests related to this collection. If this request is approved by OMB, respondents will have the option of submitting their requests in hard copy using any written format (no change to the process) or electronically via form DS-6004.

Background

1405-0173 was last approved in January of 2016. At that time, DDTC provided notice to the public that an electronic method of submission was forthcoming:

"Currently, there is no option of electronic submission of this information. Submissions are made via hardcopy documentation. Applicants are referred to ITAR §123.9 for guidance on information to submit regarding the request to change end-user, end-use and/or destination of hardware. DDTC plans to provide an electronic form that applicants may use for the purposes of obtaining an ~~advisory opinion~~ [authorization pursuant to §123.9]. Eventually, the applicant will be able to access this form from the DDTC website, complete it online, and submit it via the Internet." (Supporting Statement, Question 3)

DDTC did not receive comments in response to the possibility of electronic submission during the 60 or 30 day comment periods.

Proposed form DS-6004

Block		Corresponds with ITAR Section
Transaction ID	→	N/A
Supporting Documents	→	123.9(c), 123.1, 126.13(a), 123.10, 130.10
1	→	Date is generated by the system.
2	→	N/A—Applicant Contact Information. A written response will be sent to the address provided. DDTC

will use the phone number provided for non-standardized follow-up questions, if necessary.

3	→	123.9(c)(1)
4	→	123.9(c)
5	→	123.9(c)(2)
6	→	Block 6 is calculated by the system.
7	→	123.9(c)(3), 123.1(c)(2)
8	→	123.9(c)(3)
9	→	123.9(c)(3)

Benefits

Allowing electronic submission will produce the following benefits:

1. Those who choose to submit electronically will instantly transmit their information directly to DDTC. This eliminates the need for a third party to transport information to DDTC which, in turn, reduces the amount of time that passes between industry submission and DDTC response, as well as eliminates any costs associated with mailing responses.
2. DS-6004 ensures that respondents are submitting all of the information required for their transaction by displaying all of the required fields. Ensuring that all required information has been provided reduces the risk of requests being returned without action due to a lack of information.
3. Form DS-6004 structures the data to be more easily assessed by DDTC.

Drafted: DCanfield x33759

Approved: KWrege

Cleared:

DTCM	ADearth	(ok)
L/PM	SRogers	(ok)