flex™

Email: DDTCPublicComments@state.gov

Subject: Comment on Form DS-7789, Statement of Material Change, Merger, Acquisition, or Divestment of a Registered Party.

To whom it may concern,

On behalf of Flextronics, our comments are below:

Flex or Flextronics as we were formerly known, is a company that pursues and completes numerous acquisitions each year, as well as an occasional divestiture. Although most of the Flex acquisitions and divestitures are not ITAR companies, it would still be a great burden for a large company, such as Flex, with negotiations for acquisitions and divestitures going on continually, to have to notify DDTC 60 days prior to completion of the acquisition or divestiture. Flex's negotiations/deals are never final and/or certain to be concluded, until just before the contracts are signed by top management at both companies.

Flex will always be compliant with DDTC's requirements. The current policy of notifying DDTC 5 days after the acquisition and/or divestiture is concluded still requires us to communicate when an Acquisition or Divestiture occurs, but it allows for DDTC communication compliance within the reality and timing of business negotiations, final agreements, and contracts. We would really appreciate DDTC taking seriously the comments that Flex has just made. Thanks for your consideration.

Yours truly,

R. Dann Sherman

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