DTAG Working Group 1 - One-Form Electronic Filing Draft Questionnaire

Background information to complete survey:

The proposed DDTC One-Form (DS-7788) is envisioned to replace all currently required unclassified licensing forms (DSP 5, 6, 61, 62, 73, and 74). The One-Form DS-7788 user interface would be question based (similar to Turbo Tax) and would allow applicants to enter all data currently required by existing forms, transmittal letters, agreement documents, and other supporting documentation and to electronically sign the application. The system would also continue to allow users to provide data on a machine-to-machine basis (currently referred to as "batch filing"). Users would be allowed to make corrections after submittal during the DDTC review process. As currently envisioned, once DDTC has reviewed and approved the application, the system would produce a license that provides information for the applicant and foreign parties to ship against it.

DDTC tasked the Defense Trade Advisory Group (DTAG) with providing recommendations with the tasks in section 2-4 below. The DTAG would like additional information from industry to respond to this request. Participation in this survey is voluntary

Potential Public Information:

Under the Federal Advisory Committee Act (FACA), this Questionnaire and all aggregate survey data will be included in the DTAG records and will be subject to the Freedom of Information Act (FOIA). As such the information is potentially releasable to the public in response to a FOIA request.

Survey Instructions:

Please forward this survey to the Trade Compliance and Information Technology professionals in your organization for input. A Word version of the survey will be provided to help gather the information. When your organization has a final response, please submit your answers to the survey via Survey Monkey. This survey's distribution and the distribution of all information other than the DDTC tasking, is limited to DTAG members and their respective organizations.

Section 1 - General questions

- 1. In which industry is your company primarily involved? (Check all that apply)
 - a. Aerospace
 - b. Electronics
 - c. Weapon systems
 - d. Arms
 - e. Marine
 - f. Education/university
 - g. Service provider
 - h. Other _____
- 2. What is your company's size? (Check one)
 - a. Small up to 100 employees
 - b. Mid-sized up to 500 employees
 - c. Large over 500 employees
- 3. Which regulatory agency controls the majority of your company's products? (Check one)
 - a. 100% State Department controlled
 - b. 100% Commerce Department controlled
 - c. Mix of both with majority State Department controlled
 - d. Mix of both with majority Commerce Department controlled
 - e. Other, please state which regulatory agencies apply (i.e. OFAC)
- 4. Do you have in-house IT support or use outside sources to service your company's IT needs?
 - a. In-house IT support
 - b. Outside IT support
 - c. Both

- 5. Do you currently file license applications using Electronic Batch filing in DTrade
 - a. Yes
 - b. No
- 6. Do you have in-house Trade Compliance support or use outside sources to service your company's Trade Compliance needs?
 - a. In-house Trade Compliance support
 - b. Outside Trade Compliance support
 - c. Both

<u>Section 2 - Questions related to Task 1 -Interagency One Form</u>

The Interagency One Form is an interagency form that allows industry to request authorizations from Department of State (DDTC), Department of Commerce (BIS) and Treasury (OFAC). TASK: Would industry benefit from a single interagency form where the data elements needed by DDTC, BIS, and OFAC are collected using a single system user interface or single machine-to-machine data interface?

- 1. Would industry benefit from the Interagency One Form where the data elements needed by DDTC, BIS, and OFAC are collected using a single system user interface or single machine-to-machine data interface?
 - a. Yes
 - b. No
- 2. What would be the benefits to having the Interagency One Form? Check any that apply:
 - a. Ease of application same form used for multiple agencies simplifies user entry
 - b. Process simplification due to uniform data elements among agencies
 - c. IT systems simplification
 - d. Other enter your own comments
- 3. Do you anticipate any negative impacts with the migration to the Interagency One Form?
 - a. No
 - b. If Yes, provide more information in the textbox below.
- 4. If DDTC implements the DDTC One Form DS-7788 in DECCS as an interim step to implementing an Interagency One Form at a later date, would this additional step be an additional burden to your company?
 - a. Yes
 - b. No
 - c. If yes, provide detail below in the text box below and see Question 5
- 5. If DDTC implements the DDTC One Form DS-7788 in DECCS, what would be the cost implications to your company? Please provide estimated costs:
 - a. Less than \$10,000
 - b. \$10,000 to \$50,000
 - c. \$50,001 to \$100,000
 - d. \$100,001 to \$500,000

	e. f.	More than \$500,000 Unknown
6.	Interago a.	uch time will be required for your company to adjust internal systems to utilize a new ency One Form? One month Two months
		Three months LongerHow Much Time Estimated in Months
7.	would be a. b. c. d. e.	teragency One Form is implemented subsequent to DDTC's One Form DS-7788, what be the cost implications to your company? Please provide estimated costs: Less than \$10,000 \$10,000 to \$50,000 \$50,001 to \$100,000 \$100,001 to \$500,000 More than \$500,000 Unknown
8.	Form so subsequence a. b.	having the DDTC One Form DS-7788 developed in conjunction with the interagency One of that very little change would be needed when the Interagency One Form is uently implemented make it more cost effective to your company? Yes No Makes no difference
9.	One For a. b. c.	uch time will be required for your company to adjust internal systems to utilize the DDTC rm DS-7788? One month Two months Three months LongerHow Much Time Estimated in Months
10.	Interago a. b. c.	uch time will be required for your company to adjust internal systems to utilize a new ency One Form? One month Two months Three months LongerHow Much Time Estimated in Months
11.	include Volunta	tion to licenses, would there be a benefit to having other submissions and functionalities d in an Interagency electronic filing system (i.e., Commodity Jurisdictions, CCATS, ary Disclosures, Advisory Opinions, General Correspondences and Reporting)? Please response in text box.

12. What support will be needed from the USG agencies in transitioning to the Interagency One

Form? Please provide response in text box.

- 13. Would you be willing to participate in any form of testing associated with new form/systems before go live?
 - a. Yes
 - b. No

Section 3 - Questions related to Task 2 - Electronic Batch Filing

TASK: Would expanding the current license based batch filing (to include registration filings and updates, notifications, CJ, etc.) positively impact industry, and if so, how does industry want DDTC to prioritize this expansion and does a cost-benefit analysis support this recommendation?

- 1. Would expanding the current electronic batch filing to include registration filings and updates, notifications, CJ, etc. positively impact your organization?
 - a. Yes
 - b. No
 - c. Impact Neutral
 - d. Not applicable
- 2. What are the benefits to having batch filing capability for other types of submissions? Provide response in text box
- 3. Outside of electronic batch filing, how many manual submissions does your company make per year?
- 4. Does your company generate sufficient volume of these types of submissions to make electronic batch filing cost effective?
 - a. Yes
 - b. No
- 5. Does electronic batch filing work best within your company's enterprise system?
 - a. Yes
 - b. No
 - c. Not applicable
- 6. What are the cost implications to your company in developing a system or process to allow for electronic batch filing of these types of submissions in terms of cost benefits – time and .labor? Estimates can be given.
 - a. Less than \$10,000
 - b. \$10,000 to \$50,000
 - c. \$50,001 to \$100,000
 - d. \$100,001 to \$500,000
 - e. More than \$500.000
 - f. Unknown

- 7. If expanded electronic batch filing is desired, how does industry want DDTC to prioritize this expansion? Prioritize the following types of transactions from 1 to 4 with 1 being most important:
 - a. Registration filing
 - b. Registration updates & changes
 - c. Notifications to DDTC
 - d. Commodity Jurisdiction determination requests
 - e. Advisory Opinion requests
 - f. Disclosure submissions
 - g. General Correspondence authorization requests
 - h. Reporting

<u>Section 4 - Questions related to Task 3 - Authentication</u>

TASK: Would modifying user access/authentication process from current Identrust Certifications to other modern access/authentication procedures positively impact industry, and if so, what are your specific modification recommendations and does a cost-benefit analysis support this recommendation?

- Would modifying user access/authentication process from current IdenTrust Certifications to other modern access/authentication procedures positively or negatively impact your company? (check one)
 - a. Positive
 - b. Negative
 - c. Neutral
- 2. What are the positive aspects of remaining with the current digital certifications? Please respond in the text box
- 3. What are the negative aspects of staying with the current digital certifications? Please respond in the text box
- 4. What are the cost implications for your company to change to another type of authentication?
 - a. Less than \$1,000
 - b. \$1,001 to \$5,000
 - c. \$5,001 to \$10,000
 - d. \$10,001 to \$15,000
 - e. More than \$15,001
 - f. Unknown
- 5. If the new authentication method did not have the annual \$119 per person cost, would it be more acceptable to you?
 - a. Yes
 - b. No

6.	Does your company have a large number of personnel who would need to have new authentication? Select one group (estimates are fine): a. 1-10 b. 11-25 c. 26-50 d. 51-75 e. 76-100 f. 100+			
7.	Would your company prefer one authentication method or several depending on the role(s) (super users vs. users) or individual(s) (third-party counsel/consultant vs. company designated Empowered Officials) accessing DECCS on behalf of your company? Please provide response in text box.			
8.	What other types of authentication are used by your company that might be applicable for DDTC use? Please provide response in text box.			
9.	What other types of authentication methods do you think might be valid replacements for digital certificates? (E.g. industry-standard two-factor authentication methods) Please provide response in text box.			
10.	10. Should authentication methods vary depending on the method of access such as human-to-web portal versus vender/machine interface to DECCS server? Please provide response in text box.			
11.	What does your company want in terms of data security? a. DFAR Cyber Security b. NIST 800-171 c. Both d. Other			
12.	 What does your company desire in terms of strength of authentication? a. Satisfy minimum encryption requirements b. Option available for greater encryption c. Satisfy requirement of UCTI, CUI and/or CDI d. Other (please specify) 			