

**Industry Notice – ECR Transition Timeline Extended:** On October 3, 2013, DDTC published a final rule implementing initial revisions to the International Traffic in Arms Regulations pursuant to the President’s Export Control Reform initiative (see 78 Fed.Reg. 61,750). The preamble to this rule set forth a “Transition Plan” advising that certain licenses, authorizations, and agreements would remain valid for a period of two years from the effective date of the rule (October 15, 2013). DDTC is modifying this guidance. The relevant excerpts from the Transition Plan, and updated guidance pertaining to those excerpts, are as follows:

- “A license or authorization issued by the Department will be effective for up to two years from the effective date of the revised USML category if all the items on the license or authorization have transferred to the export jurisdiction of the Department of Commerce.” (78 Fed. Reg. 61,752)

*Updated guidance:* Licenses or authorizations that would otherwise expire at the conclusion of the referenced two-year period will remain valid for 48 months from the date of issuance, or as otherwise indicated on the license or authorization.

- “Approvals issued for agreements submitted prior to the effective date of the relevant revised USML category that contain transitioning and nontransitioning items will remain valid until expired, unless they require an amendment, or for a period of two years from the effective date of the relevant final rule, whichever occurs first, unless otherwise revoked, suspended, or terminated.” (78 Fed. Reg. 61,752)

*Updated guidance:* For agreements that would otherwise expire at the conclusion of the referenced two-year period, DDTC is extending the period of validity by one year.

- “Approvals issued for agreements submitted prior to the effective date of the relevant revised USML category that contain solely transitioning items will remain valid for a period of two years from the effective date of the relevant USML category, unless revoked, suspended, or terminated. “ (78 Fed. Reg. 61,752)

*Updated guidance:* For agreements that would otherwise expire at the conclusion of the referenced two-year period, DDTC is extending the period of validity by one year.