



*“Compliance with U.S.
Regulations: Global Companies’
Practical Perspectives”*

Presented to
Joint EGAD and SIA Workshop on
US Export Controls

by

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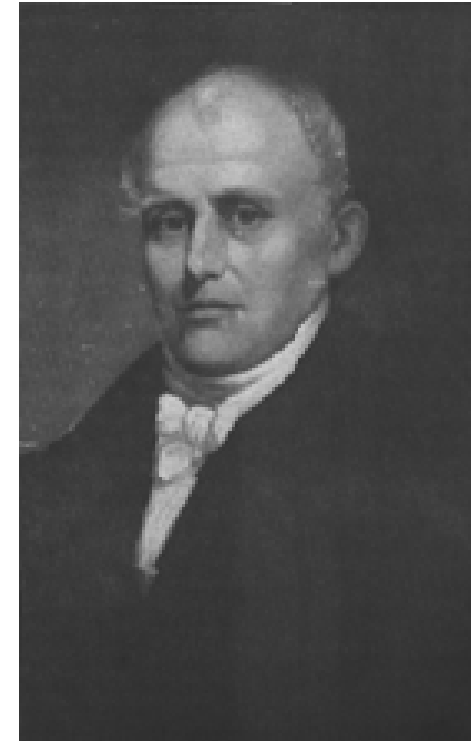
October 20, 2005



A Historical Perspective on Export Controls

Who was Samuel Slater?

- a) Master textile machine mechanic
- b) Father of the American Industrial Revolution
- c) Major violator of U.K. export controls
- d) All of the above





Changing Compliance Risks

- Consolidation of aerospace/defense industry within U.S. and across national borders
- Fewer major acquisition programs (*e.g.*, JSF, Future Combat Systems, DD(X))
- Acceptance of multinational collaborative programs
- Outsourcing of logistics and other functions
- Use of commercial-off-the-shelf (COTS) products and “best value” acquisition policies by US DoD and other defense ministries
- New controls on exports/re-exports of information by U.S. allies (see, *e.g.*, UK Export Control Act 2002)

Elements of an Effective Export Control Compliance Program

- Compliance Program Organization
- Management Support
- Policy Development
- Classification of Products & Technology
- Screening for Embargoes & Restricted Parties
- License Application
- License Implementation & Monitoring
- Controls on Foreign National Employees & Visitors
- Record Keeping
- Reporting
- Auditing
- Training
- Handling Suspected Violations
- Program Review