

COMMODITY CLASSIFICATION

UNITED STATES DEPARTMENT OF COMMERCE  
 BUREAU OF INDUSTRY AND SECURITY  
 WASHINGTON, D.C. 20230

CASE NUMBER: Z728038

OWEN COMPLIANCE SERVICES, INC.  
 ATTN: DAVID W. BOSTON  
 12001 COUNTY ROAD 1000  
 GODLEY, TX 76044

FEBRUARY 20, 2008  
 CCATS #: G061453

THE FOLLOWING INFORMATION IS IN RESPONSE TO YOUR INQUIRY OF FEBRUARY 11, 2008  
 REQUESTING LICENSE INFORMATION FOR:

COMMODITY	ECCN	LVS	IVL REQUIRED FOR COUNTRY GROUPS	LVS DOLLAR LIMIT
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ITEM #1:				
1) VARIOUS MODELS, OIL WELL TUBING CUTTERS CONTAINING RDX, HMX, HNS, PYX AND/OR OTHER MILITARY EXPLOSIVE, 500 G/EA (MAX), 5 EA/BOX (MAX). VMTC	1C992J			\$0
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COMMENTS FROM LICENSING OFFICER(S): NONE

ITEMS OTHERWISE ELIGIBLE FOR EXPORT OR REEXPORT UNDER A LICENSE EXCEPTION OR  
 NLR (NO LICENSE REQUIRED) AND USED IN THE DESIGN, DEVELOPMENT, PRODUCTION OR  
 USE OF NUCLEAR, CHEMICAL OR BIOLOGICAL WEAPONS OR MISSILES REQUIRE  
 A LICENSE FOR EXPORT OR REEXPORT AS PROVIDED IN PART 744 OF THE EXPORT  
 ADMINISTRATION REGULATIONS (EAR)

DESTINATIONS REQUIRING A LICENSE

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 SEE THE COMMERCE COUNTRY CHART (SUPPLEMENT NO. 1 TO PART 738 OF THE EAR) TO  
 DETERMINE WHICH COUNTRIES REQUIRE A LICENSE. USE THE COUNTRY CHART COLUMN  
 INFORMATION GIVEN ON THIS FORM IN CONJUNCTION WITH THE COUNTRY  
 CHART TO DETERMINE THE LICENSING REQUIREMENTS FOR YOUR PARTICULAR ITEMS.  
 FOR ITEMS CLASSIFIED EAR99, SEE PART 746 OF THE EAR TO DETERMINE THE  
 LICENSING REQUIREMENTS.

APPLICATIONS FOR EXPORT MUST BE SUBMITTED ON FORM BIS-748P MULTIPURPOSE  
 APPLICATION. THESE FORMS MAY BE OBTAINED BY CALLING (202) 482-3332 OR  
 REQUESTING DIRECTLY ON THE BIS INTERNET WEB SITE. ASSISTANCE IN FILLING OUT  
 THE FORM, OR ANY ASPECT OF EXPORTING, IS PROVIDED BY THE EXPORT COUNSELING  
 DIVISION IN WASHINGTON, D.C. AT (202) 482-4811 OR THE WESTERN REGIONAL OFFICE  
 IN NEWPORT BEACH, CALIFORNIA AT (714) 660-0144.

LICENSE EXCEPTIONS

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 BE AWARE THAT THE LICENSING REQUIREMENTS FOR SOME DESTINATIONS MAY BE OVERCOME  
 BY ANY LICENSE EXCEPTION FOR WHICH YOUR ITEMS QUALIFY. SEE PART 740 OF EAR  
 FOR INFORMATION ON LICENSE EXCEPTIONS. THE LICENSE AVAILABLE COLUMN ON  
 THIS FORM LISTS ONLY THOSE LICENSE EXCEPTIONS OF THE SET GBS, CIV, APP, TSR  
 WHICH ARE APPLICABLE TO YOUR ITEMS. OTHER LICENSE EXCEPTIONS MAY APPLY,  
 DEPENDING UPON THE CIRCUMSTANCES OF YOUR INTENDED TRANSACTION.

EXPORT CONTROL CLASSIFICATION NUMBERING SYSTEM (ECCN)

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THE ECCN NUMBERING SYSTEM IS FOUND IN THE COMMERCE CONTROL LIST (CCL) PART 774 OF THE EAR. THE CCL IS A COMPREHENSIVE LIST THAT IDENTIFIES ALL ITEMS CONTROLLED AND LICENSED BY COMMERCE. WITHIN THE CCL, ENTRIES ARE IDENTIFIED BY AN ECCN. EACH ENTRY SPECIFIES THE LICENSE REQUIREMENTS FOR THE ITEM AND THE REASON(S) FOR CONTROL. PLEASE CONSULT PARTS 738 AND 774 OF THE EAR FOR SPECIFIC INFORMATION ON ECCNS.

SHIPPERS EXPORT DECLARATION (SED)  
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WHEN AN EXPORT IS MADE, IT IS NECESSARY FOR THE EXPORTER TO SHOW ON THE SHIPPERS EXPORT DECLARATION (FORM 7525-V) IN BLOCK 27 EITHER THE LICENSE NUMBER, THE APPLICABLE LICENSE EXCEPTION SYMBOL OR THE SYMBOL NLR. FORM 7525-V IS AVAILABLE FROM THE SUPERINTENDENT OF DOCUMENTS, U.S. GOVERNMENT PRINTING OFFICE OF WASHINGTON, D.C. 20402, AND FROM EXPORT ADMINISTRATION DISTRICT OFFICES (U.S. DEPT. OF COMMERCE).

BERNARD KRITZER  
DIVISION DIRECTOR

FOR INFORMATION CONCERNING  
THIS CLASSIFICATION CONTACT  
KIKI IKOSSI  
PHONE #: (202) 482-0307  
BIS/STC/EL