



2101 Wilson Boulevard, Suite 700, Arlington, VA 22201-3060 • (703) 522-1820 • (703) 522-1885 Fax • NDIA.org

Mr. Joseph A. Cristofaro  
Director, Sensors, Aerospace and Marine Division  
Office of National Security Controls  
Bureau of Industry and Security  
U.S. Department of Commerce

Electronic Submission: [www.regulations.gov](http://www.regulations.gov), *BIS-2024-0031*, *RIN 0694-AJ87*

Re: NDIA comments on the interim final rule on revisions to space-related export controls (BIS-2024-0031)

Dear Mr. Cristofaro,

The National Defense Industrial Association (NDIA) appreciates the opportunity to comment on the interim final rule on revisions to space-related export controls.

NDIA is the nation's oldest and largest defense industry association, representing over 1,700 corporate and over 65,500 individual members from small, medium, and large contractors, a majority of which are small businesses. NDIA members design, manufacture, apply, and maintain the cutting-edge technologies, systems, and platforms that our armed forces rely upon to deter aggression and defend our nation and its interests. As such, our members' professional and informed views on this request for information reflect the complexity and nuance of the issues under discussion.

### **Specific Comments and Recommendations:**

#### **9A515.y:**

y.6. Flight cable assemblies for spacecraft applications;

- NDIA proposes that DDTC move cable assemblies, electrical connectors, and related parts and components caught by the “specially designed” criteria in USML Category IV(h) to the CCL as 9A15.y.6. Space grade cable assemblies are very similar to custom cable assemblies used in or with other applications including telemetry, tracking, and control ground systems, which are already classified as 9A515.y.6. Any differences between the flight cable assemblies used on rockets and (i) space grade flight cable assemblies used on its spacecraft, (ii) ground station cable assemblies, and (iii) similar cable assemblies used in commercial industrial applications are minor and are driven generally by factors such as length, weight, and cost.



2101 Wilson Boulevard, Suite 700, Arlington, VA 22201-3060 • (703) 522-1820 • (703) 522-1885 Fax • [NDIA.org](http://NDIA.org)

### **9A604.x**

- NDIA recommends revising the License Requirements section under the NS1 and RS1 Control entries to exclude 9A604.x from the scope of licensing requirements and to make a conforming change to add NS2 and RS2 Control for 9A604.x
- Items that would otherwise be 9A515.x are caught by 9A604.x because they are “specially designed” for USML Category IV or 9A604.x items. This is because the Order of Review does not have a release for items to fall from 9A604.x to 9A515.x if the items were originally designed for a Category IV or 9A604.x system.
  - Example: Valves used on both spacecraft and Launch Vehicles would be caught in 9A604.

### **Closing**

NDIA appreciates the opportunity to present our comments and recommendations for the rule. If you have any questions related to these comments, please contact Michael Seeds at [mseeds@ndia.org](mailto:mseeds@ndia.org).

Sincerely,

National Defense Industrial Association