



Export Control Reminder: Encryption Reporting Deadline 2/1/17

January 12, 2017

The new year brings with it the reporting deadlines for exports of encryption items under the US Export Administration Regulations (“EAR”). February 1, 2017 is the deadline for submitting annual self-classification reports for encryption items exported or re-exported during calendar year 2016 (January 1 through December 31, 2016), as well as semi-annual reports for specified encryption items exported or re-exported between July 1 and December 31, 2016.

Note that due to recent amendments to the EAR’s encryption controls, effective September 20, 2016, companies that have obtained a formal commodity classification or CCATS for certain encryption products are no longer required to submit annual self-classification reports. Please contact us to learn more about how to obtain a CCATS from the Commerce Department and eliminate your annual self-classification reporting burden going forward.

The new year is also a good time to conduct an export compliance check-up, including an assessment of any new product offerings or changes to the encryption functionality of existing products.

If you would like assistance determining whether the encryption export controls and reporting deadlines apply to your products and associated technology, please contact a member of our team.

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