

May 20, 2011

Ms. Lisa V. Aguirre
Director, Office of Defense Trade Controls Compliance
PM/DDTC, SA-1, 13th Floor
Office of Defense Trade Controls
Attn: Electronic Payment of Registration Fees
Bureau of Political Military Affairs
U.S. Department of State
Washington, DC 20522-0112



Dear Ms. Aguirre:

Thank you for the opportunity to comment on the Proposed Rule, which was published on February 24, 2011 (76 Fed. Reg. 10291, to amend Parts 122 and 129 of the International Traffic in Arms Regulations ("ITAR")). Specifically, the Proposed Rule intends to change the method of payment of registration fees to electronic submission and to add the definitions of "Foreign Ownership" and "Foreign Control" to Part 120.

The Boeing Company ("Boeing") appreciates your continued commitment to streamline the ITAR and the Department's efforts supporting the President's export control reform initiative. Electronic payment of registration fees would make the process easier and faster and prevent potential delays in the receipt of payment. Additionally, the inclusion of the definitions for "Foreign Ownership" and "Foreign Control," which are currently addressed as a function of registration under Part 120, is an important improvement in clarity, as these definitions impact many other activities either subject to or related to the ITAR.

We want to take this opportunity to express a general concern regarding the Statement of Registration (Form DS-2032). This form requires the provision of sensitive personal information about the registrant company's officers, including Social Security Number ("SSN") and date of birth. This and other types of personal data are treated by Boeing as Personally Identifiable Information, or PII, and as such protected by company policy from disclosure both within and outside of the company. We do not believe this information should be shared, in as much as the company has done the necessary due diligence (including denied party screening and background checks) on the senior individuals listed as officers and members of the board. The certification of the signature on the registration form should be sufficient confirmation of the company's due diligence. Therefore, we respectfully request that the Department consider revising Form DS-2032 to eliminate the requirement to provide the SSN and date of birth.

More specifically, we also want to take this opportunity to address the Department's current discretionary practice regarding who within a registered company should sign notifications of changes to information furnished to DDTC pursuant to Part 122.4 of the ITAR. This section of the regulations does not specify who the signatory must be, and it would be helpful for companies to be able to depend upon consistent guidance across industry regarding this requirement. We propose that the regulations clarify or guidance from your office be issued that states that a senior individual responsible in the corporation who has enterprise wide responsibility for the trade controls function be permitted to submit notification of changes.



Please do not hesitate to contact me if you have any questions or if we can be of any assistance. I can be reached at (703) 465-3505 in our Arlington, Virginia office or at Stephanie.A.Reuer@Boeing.com

Sincerely,

A handwritten signature in black ink, appearing to read "Stephanie A. Reuer". The signature is fluid and cursive, with a large loop at the end.

Stephanie A. Reuer
Director, International, Policy and Licensing Administration
Global Trade Controls