

July 15, 2019

Jennifer Jessup, Departmental Paperwork Clearance Officer  
U.S. Department of Commerce  
1401 Constitution Avenue NW, Room 6616  
Washington, DC 20230

**Reference:** Federal Register / Vol. 84, No. 94/ Wednesday, May 15, 2019  
Proposed Information Collection; Comment Request; International Import  
Certificate

**Submitted via** [docpra@doc.gov](mailto:docpra@doc.gov)

Dear Ms. Jessup:

The Boeing Company ("Boeing") welcomes this opportunity to provide comments on the International Import Certificate, Form BIS 645P. We appreciate BIS's role in facilitating compliant international trade by certifying U.S. importers' IICs. U.S. importers frequently require a signed IIC from BIS in order to permit the foreign seller to proceed with its government's export approval process. In response to the specific request for comments on ways to minimize the burden of the information collection for respondents, including through the use of automated collection techniques or other forms of information technology, we believe both U.S. importers and BIS would greatly benefit from an electronic process for receipt and processing of IIC certification requests. The current system relies on paper forms and mail delivery services. We recommend an electronic process that would provide tracking of submissions and processing status, and issuance of approved certificates. We believe processing times would substantially decrease as a result, greatly facilitating international transactions requiring these certificates.

Please do not hesitate to contact me if you have any questions or need additional information. I can be reached at 703-465-3312 or via email at [arthur.shulman@boeing.com](mailto:arthur.shulman@boeing.com).

Sincerely,

A handwritten signature in black ink, appearing to read "Arthur Shulman".

Arthur Shulman  
Director, Global Trade Controls