



# Controlled Trade Markup Language (CTML)

## Working Draft v0.1.0.1, 26 August 2002

### Document identifier:

CTML Draft Specification v0.1.0.0

### Location:

<http://www.oasis-open.org/spectools/docs/>

### Editor:

Kathleen Yoshida, FGM Inc. <kathleen@fgm.com>

### Contributors:

Members of the OASIS Controlled Trade Markup Language (CTML Technical Committee (TC) contributed to the development of this specification and are list in the Acknowledgments section of this document. Most were members of the CTML TC from June 2002 until the agreement of the specification. Some CTML TC members changed their affiliation to OASIS members, but remained members of the TC; multiple affiliations are shown separated by semi-colons.

### Abstract:

The purpose of the CTML TC is to develop a unified trade control vocabulary that supports an international collection of business documents (e.g., trade applications, cases, licenses, delivery verification certificates, etc.) through the extension and expansion of an existing XML vocabulary. A goal of our work will be to incorporate the best features of other XML business vocabularies and provide a clearly articulated interface to other mutually supporting specifications. The CTML specification is intended to become an international standard for controlled trade activities, and together with other XML specifications, allow industry, nongovernmental organizations, and governments to unambiguously identify the essential business and legal documents to be exchanged in particular business contexts and geographic locales (i.e., country).

Furthermore, the CTML will align its vocabulary and structures with the vocabulary and structures of other OASIS libraries (like Unified Business Language, Business Transactions, and Customer Information Quality) and implement a mechanism for the generation of context-specific schemas for basic business documents and their components through the application of transformation rules to a common XML source library.

The specification will be open to everyone without licensing or other fees.

### Status:

This version of the specification is a working draft of the committee. As such, it is expected to change prior to adoption as an OASIS standard.

This specification defines an XML vocabulary for controlled trade activities. This version of the specification is a working draft of the committee, and as such, it is expected to change prior to adoption as an OASIS standard. This document is updated periodically on no particular schedule. Send comments to the editor.

## DRAFT

43 Committee members should send comments on this specification to the  
44 `ctml@lists.oasis-open.org` list. Others should subscribe to and send comments to the  
45 `ctml-comment@lists.oasis-open.org` list. To subscribe, send an email message to  
46 `ctml-comment-request@lists.oasis-open.org` with the word "subscribe" as the body of  
47 the message.

48 For information on whether any patents have been disclosed that may be essential to  
49 implementing this specification, and any offers of patent licensing terms, please refer to  
50 the Intellectual Property Rights section of the "Controlled Trade" TC web page  
51 (<http://www.oasis-open.org/committees/controlledtrade/>). The errata page for this  
52 specification is at <http://www.oasis-open.org/committees/xxx/yyy>.

## 53 Table of Contents

54	Introduction.....	4
55	1.1 Controlled Trade Actors .....	5
56	1.2 Controlled Trade Environment.....	5
57	1.3 Controlled Trade Baseline Interaction .....	6
58	2 CTML Glossary .....	7
59	2.1 Actors.....	7
60	2.1.1 Regulatory Actors .....	7
61	2.1.2 Industry Actors .....	9
62	2.2 Trade Components.....	11
63	2.2.1 Party .....	11
64	2.2.2 Item.....	13
65	2.2.3 Location.....	16
66	2.2.4 Relationship .....	18
67	2.3 Political Components .....	20
68	2.3.1 Policy.....	20
69	2.3.2 Statute .....	20
70	2.3.3 Regime .....	20
71	2.4 Regulatory Activities.....	22
72	2.4.1 Guidance .....	22
73	2.4.2 Determination.....	24
74	2.4.3 Instruction.....	26
75	2.4.4 Verification .....	27
76	2.5 Industry Activities.....	28
77	2.5.1 Export Management .....	28
78	2.5.2 Process Compliance.....	29
79	2.5.3 Transaction Compliance.....	30
80	2.6 Process .....	32
81	2.7 Commentary .....	34
82	3 References .....	35
83	3.1 Normative.....	35
84	Acknowledgments .....	36
85	Appendix A. Revision History .....	37
86	Appendix B. Regulatory Actors Illustration .....	38
87	Appendix C. Notices.....	39
88		

---

## Introduction

When the Berlin Wall fell in late 1989 and the Soviet Union collapsed in 1991, new opportunities for the global economy emerged. This economy introduced new opportunities and challenges to government and industry, especially in the realm of international trade. Unauthorized trade—especially military trade—soon surfaced as a viable threat to global and regional security. As industry increased the speed and efficiency of its electronic trading processes, governments struggled to keep up. There was insufficient government–industry cooperation in this area. For government, there were few tools available to guard against unauthorized or illegal trade. For industry, there were few tools available to help them become more competitive and adapt to the global trading environment. International trade was still defined in the context of the Cold War and not in the context of economic and technological realities. Something had to change.








Commerce involves the marketing and exchange of goods and services between buyers and sellers over borders and distances. However, it is difficult to analyze and improve the total trading process—including security—because of the number of stages and parties involved from initial industry contact to final delivery. In both controlled and uncontrolled trade, exchanging information rapidly and accurately among companies, between industry and government, and among governments is indispensable to maintaining positive control over sensitive transactions while facilitating and fostering legitimate trade. Uncertainty in how long a particular activity is expected to take and who are the parties involved increase both time and risk of compromise.

Because the current global trade control process relies on a collection of loosely related automated systems, processes, and technologies, information sharing and coordination among participating ministries and governments can be challenging, if at all possible. Recognizing this challenge and the potential benefits of—and need the for—improved coordination and communication, CTML seeks to unite and modernize the global trade control community by creating a unified trade control markup language, a vocabulary and specification that would ultimately become part of the global economic infrastructure and normal business activities.

Our vision is to protect national security interests in a competitive commercial market environment by establishing the first modern, global, and controlled trade language. Building on other committee works, CTML will become an integral and seamless part of the global trade control system—a virtual network of cooperation and information sharing. The specification will incrementally improve the language necessary to support a global trade control system, starting with government–to–government interfaces and expanding to industry–government in subsequent iterations. The United Nations Economic and Social Council echoed the need for systems, which can be extended to export control systems, to be part of electronic business activities. The UN's Electronic Data Interchange for Administration, Commerce, and Transport, 97N007 stated that “Transactions not only between businesses, but also between business and governments, and business and consumer can be built for specific purposes, defined in time, as opposed to established and permanent business relationships,” stressing the need for governments and industry to be integrated as part of export control.

## 1.1 Controlled Trade Actors

The major actors in the CTML domain are shown in the diagram of below.

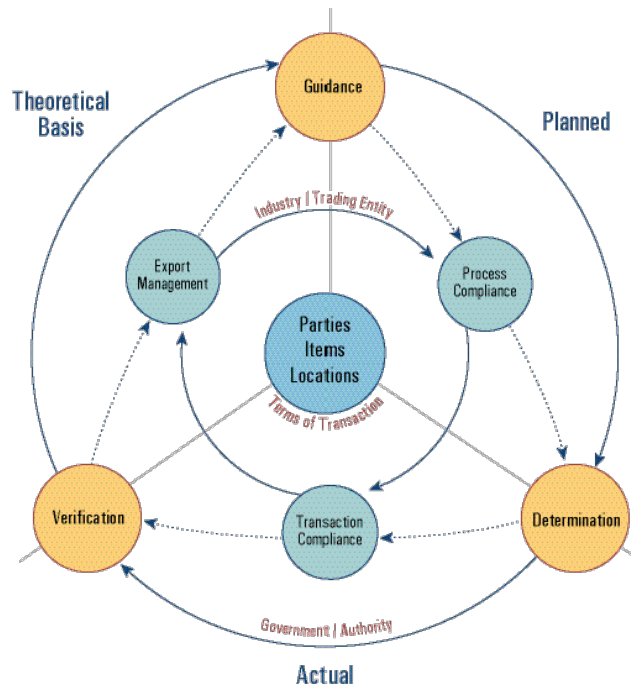
<b>Economy</b> 	MOE typically has commodity jurisdiction over dual-use items	<b>Energy</b> 	Ministry of Energy (ME) typically control the export of special nuclear material-production technologies, and sensitive unclassified scientific and technical information related to the development and production of weapons of mass destruction.
<b>Defense</b> 	MOD normally determines the military position on export license applications in coordination with other departmental organizations.	<b>Customs</b> 	Customs Services normally provide law enforcement support to the application screening process and is responsible for enforcing license controls at exportation.
<b>Foreign Affairs</b> 	MFA typically has commodity jurisdiction over munitions items.	<b>Intelligence</b> 	Intelligence Services are typically responsible for managing nonproliferation intelligence issues.
<b>Industry</b> 	Industry submits export license applications and supporting technical documentation to governmental ministries, and is the originator of the export license process.		

Within government are numerous experts who play many different roles in controlled trade activities. Within industry are other experts who cooperate with government officials to help control risk associated with any particular export.

## 1.2 Controlled Trade Environment

Today, the global trade control system is a collection of loosely related automated systems and technologies operating on a variety of automated systems. There is no single system, standard, workflow, or other agreed upon methodology for conducting controlled trade activities. A broad base of domain experts use these systems and technologies to measure the relative risks associated with particular exports. However, these systems' purview is limited. Throughout the controlled trade process, some user communities rely on access to classified information as part of their daily work.

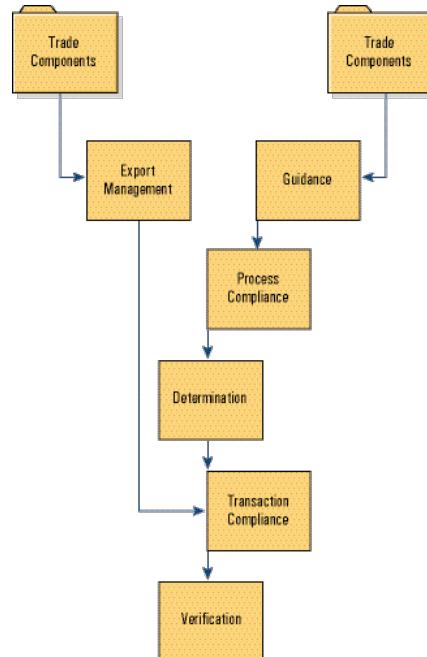
While there is no commonly accepted legal authority that consistently crosses all governments, ministries of economy (MOE) normally manage export control processes in their governments. In some countries, ministries of foreign affairs manage the export control processes. In all countries, however, other ministries play key roles in both the approval and enforcement processes. Presently, each country's export control system is composed of a range of systems and applications that reflect evolving needs and capabilities. There is no single hardware platform, operating system, application, or "tool box" available to all users and ministries.



149

### 150 1.3 Controlled Trade Baseline Interaction

151 The following illustration depicts the information associations relevant to a single instance of the  
 152 controlled trade activity.



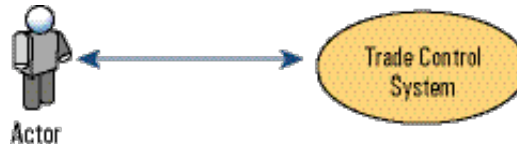
153

## 2 CTML Glossary

### 2.1 Actors

**Actor** – An entity that interacts with a system and that represents a role that a user can plan.

**ActorType** – A category of actor whose members share some qualities.



#### 2.1.1 Regulatory Actors

**AdministrativeStaff** – Perform clerical and administrative duties.

**Advisors** – are government officials outside the licensing authority who may provide specialist advice on particular aspects of an export license application.

**CaseOfficers** – are case owners who are responsible for determining the final case position. Case Officers have decision-making authority and may refer cases to persons within or outside of their agency for positions and/or recommendations.

**LicensingOfficers** – are members of the licensing authority empowered to issue export Licenses

**ReferralOfficers** – Receive cases referred by CaseOfficers. ReferralOfficers are responsible for determining the final agency position for the agency they represent. If ReferralOfficers need additional information they can refer cases to persons within their agency for positions and/or recommendations TechnicalOfficer.

**ServiceOfficer** – Are referred cases by ReferralOfficers in Defense organizations. Service Officers are responsible for determining a final Service position for the Service they represent (Army, Air Force, Navy, etc.). If ServiceOfficers need additional information they can refer cases to persons within their Service (Army, Air Force, Navy, etc.) for positions and/or recommendations.

**TechnicalOfficers** - are members of the Licensing Authority with responsibility for determining whether particular goods are licensable.

**Regime** – an international body normally created with a binding international treaty that exerts commodity jurisdiction over particular types of goods, services, and know-how.

**RoutingOfficer** – review work items and select and/or approve work item staffing.

**Analyst** – are technical, regional, or other experts whose insight about a case is requested. Analysts can comment on a Case and make recommendations or log positions.

**SupervisoryOfficer** – are managers of CaseOfficers who have the authority to perform certain acts, such as initiating an escalation or dispute resolution process, reassign work items, configure certain system settings, and grant certain user permissions.

**Countersigner** – review CaseOfficers' recommendations or positions, and approve or direct a

- 187 revision of the recommendation or position. In some offices, Countersigners are the peers of  
188 Case Officers. In others they are supervisors.
- 189 **ComputerSpecialist** – do not have direct input into the export licensing process, but rather  
190 maintain automated systems at various agencies and departments.
- 191 **Coordinator** – are responsible for gathering and distributing relevant case data; inputting case  
192 data into an automated export licensing system; and performing case-related activities at the  
193 request of Case Officers.
- 194 **OutsideSource** – are contacts of Case Officers who are able to answer questions or make  
195 recommendations about a case. OutsideSources are not within the same agency or department  
196 as the Case Officer.
- 197 **InsideSources** – are associates of Analysts who are able to answer questions or make  
198 recommendations about a case. InsideSources are within the same Agency as the Analyst.
- 199 **CommitteeChair** – are the lead members of interagency committees. Examples of typical  
200 committee chairs include escalation committees.
- 201 **CommitteeMember** – participate in one or more of the three interagency committees.  
202 CommitteeMembers may be voting and non-voting members of escalation groups.
- 203 **EscalationCommitteeStaff** – Are committee staff members who assist the committee chairs  
204 evaluate escalated cases.
- 205 **EnforcementOfficer** – Are members of Export Enforcement community who investigate parties  
206 who might be involved in the illegal export of commodities.
- 207 **Director** – are agency or department heads with management and oversight responsibilities.  
208 Directors may be required to make case decisions in the event of recommendation or position  
209 disputes.
- 210 **ComplianceTechnicians** – are enforcement analysts who reconcile parties within the system.
- 211 **CommunicationsOfficers** – send cables to embassies and consulates.
- 212 **User** – are members of the export control community who access the system in order to process  
213 work items, access data, or otherwise maintain the system [Case Referred To].



## 2.1.2 Industry Actors

**Applicant** – request licenses or other determinations from the export control authorities. An Applicant can be a member of Industry who has the authority of a principal party of interest to determine and control the export or re-export of items. An Applicant can also be a member of the government or a foreign government.

**Authority** – An actor who reviews and certifies materials submitted by industry in support of a controlled trade activity to the appropriate regulatory agencies. [Authorized Signatory].

**BoardMember** – Refers to a board of directors who in setting broad corporate goals and determining if managers are, in fact, pursuing and achieving those goals.

**Broker** – One that acts as an agent for others, as in negotiating contracts, purchases, or sales in return for a fee or commission.

**EMSAdministrator** – An individual who has been designated for oversight of the program within a single company.

**EMSResponsibleScreener** – The individual responsible for performing particular risk screens throughout an export control activity within a company.

**HoldingCompany** – [Insert definition here].

**Insurer** – [Insert definition here].

**Manufacturer** – Refers to an individual or organization that produces or provides goods, technologies, services, and know-how.

**Member** – One of the elements of a set or class.

**ParentOrganization** – [Insert definition here].

**PartyResponsibleOfficial** – Industry personnel who are responsible for all export control related functions, duties, responsibilities, positions, and employees in the firm.

**RegisteredCompany** – a company registered at national authority.

**SeniorExecutive** – Refers to an individual in an organization as having administrative or managerial responsibility

**Shareholder** – Refers to individuals or organizations as holding or owning a interest in property

**Shipper** – Refers to an individual or organization that acts as a shipper or freight forwarder for an export license applicant.

**SiblingOrganization** – Refers to organizations that are controlled by the same parent organization or individual.

**SubContractor** – Refers to one who takes a portion of a contract, as for work, from the principal contractor.

**SubOrganization** – Refers to an organization controlled or owned by another organization or

DRAFT

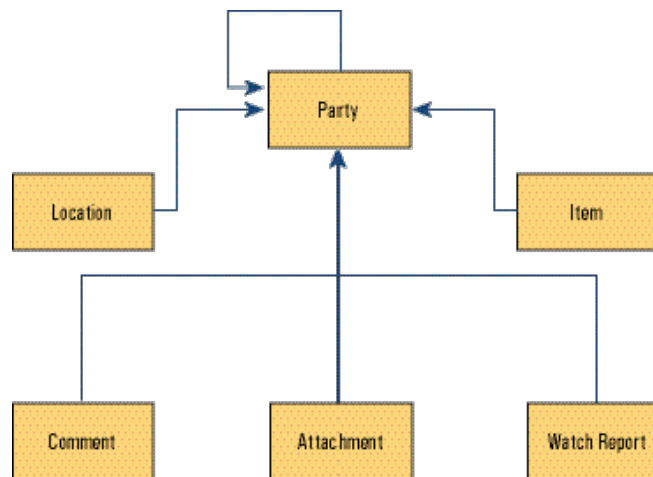
248 individual. If a SubOrganization is wholly owned, all its stock is typically held by the parent  
249 company [Subsidiary Of].

250 **Supplier** – Refers to individuals or organizations as adding as a supplement other entities.

## 2.2 Trade Components

### 2.2.1 Party

Refers to entities involved in all aspects of controlled trade activities. For example, Parties may represent those entities engaging in business activities (e.g., businesses and nongovernmental organizations) as well as those entities controlling business activities (e.g., government agencies).



**Partner** - A participant in a partnership or joint venture.

**Proprietor** - the owner of a business.

**ProcurementRole** - details of a party's role in the business transaction for which an export licence is required

**IndustryAuthority** - an individual, registered with the Licensing Authority, who is authorised to sign Export Licence Applications on behalf of a particular Applicant.

**Registered Firearms Dealer Cert No.** - The number of a certificate issued to a registered firearms dealer.

**PartyRole** – CaseParties, ApplicationParties, SystemUsers, OutsideExperts.

**PartyCaseRole** –

**PartyType** – PartyOrganization or PartyPerson.

**RegistrationID** – Refers to a code that a licensing authority assigns to a Party as part of a authorization process to allow the Party to transact goods as part of a sanctioned export license activity. RegistrationID may take alpha, numeric, and alpha-numeric forms.

**NatureOfBusiness** – Refers to the type of business in which the Party is engaged.

**PartyPerson** – Refers to a Party that is defined as a single person or individual.

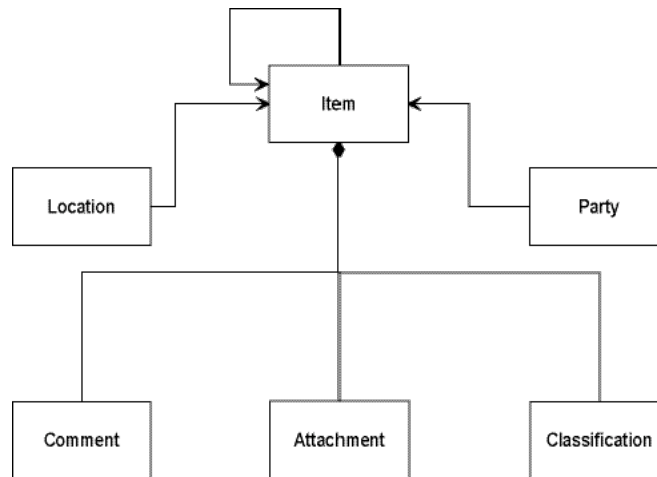
**PartyFirstName** – Refers to the first name of an individual (e.g. Michael, Francois, or Yong).

**PartyLastName** – Refers to the last name of an individual (e.g. Miller, Perreault, or Li).

- 276 **PartyGivenName** – Refers to the combination of all names that an individual has (e.g. “Phillip  
277 Michael Thomas,” “Kim Mi Yong,” or “Muhamud bin Al Gazir”).
- 278 **PartyContact** – Contact is a simple reusable entity class that defines attributes of a contact  
279 person.
- 280 **RegisteredDealer** – an individual or organisation registered with the UK Government as a dealer  
281 in firearms.
- 282 **PartyOrganization** – Organization instances are ManagedObjects that provide information on  
283 organizations such as a Submitting Organization. Each Organization instance may have a  
284 reference to a parent Organization.
- 285 **PartyOrganizationType** – CTML presently supports the following Organization TYPE: (1)  
286 Commercial, (2) Educational, (3) International, (4) LawEnforcement, (5) Government, (6) Military,  
287 (7) National, (8) Nonprofit, (9) Political, (10) Professional, and (11) Religious.
- 288 **PartyWatchRationale** – Refers to the rationale a User provides for changing a Party’s  
289 WatchReport DISPOSITION.
- 290 **PartyWatchReason** – Refers to the particular Reason an export licensing authority assigns a  
291 Party to a WatchList.
- 292 **PartyWatchReport** – Is negative information related to individuals and organizations that that is  
293 used as input to the decision making within the export control community. WatchReports may  
294 also serve as rationale for denying exports and may serve as input to more serious consequence  
295 like legal actions.
- 296 **PartyWatchReportDisposition** – CTML presently supports the following Disposition: (1)  
297 Undefined, (2) OnWatch, and (3) OffWatch.
- 298 **PartyWatchReportSource** – CTML presently supports the following Sources: (1) Undefined, (2)  
299 Internet, and NewsMedia.
- 300 **PartyWatchReportRisk** – CTML presently supports the following Risk: (1) Undefined, (2)  
301 Extreme, (3) High, (4) Medium, (5) Low, and (6) None.
- 302 **PartyWatchReasonType** – CTML presently supports the following ReasonType: (1)  
303 OutOfBusiness, (2) ChemBioConcern, (3) ControlledFirm, (4) Customs, (5) DeniedParty, (6)  
304 DesignatedNational, (7) EconomicDefenseList, (8) EnforcementConcern, (9) EntitiesList, (10)  
305 DrugTrafficking, (11) SupportsTerrorism, (12) MTCRConcern, (13) Proliferator, (14)  
306 PastSanction, (15) RoutineInvestigationObservation, (16) MultilateralControlRegimeDenial, (17)  
307 TargetedFirm, (18) BadPreLicenseCheck, (19) BadPostShipmentCheck.
- 308 **TradingParty** – Refers to a Party that is engaged in controlled trade activities. This normally  
309 involves businesses buying, selling, or bartering goods with one another. However, a  
310 TradingParty may also involve governments and nongovernmental organizations buying, selling,  
311 or bartering goods.
- 312 **Assertion** – Refers to a Boolean response to a question: (1) Employ Cryptography, (2)  
313 Cryptography (3) EU Regulated, Informed of WMD Use, Military use

### 2.2.2 Item

Refers to items of interest involved in a controlled trade activity. For example, Items may represent those things that are being bought, sold, exchanged, or otherwise traded as part of a business activity.



**ItemID** – A unique identifier for a Goods Line within an Application.

**ItemAreaUnitOfMeasure** – Refer to ISO currency codes for additional information.

**ItemDescription** – Refers to a free-form description of a particular Item considered for export [MIL Details, NUC Details].

**ItemEndUse** – Application of goods, technologies, services, or know-how to a particular desired outcome state. The declared ultimate purpose and application for a particular Item when it reaches its final destination.

**ItemECGoodsRegulated** – An assertion as to whether or not the goods covered by an Application are controlled by the European Community Dual-Use Goods Regulation.

**ItemEmployCryptography** – An assertion as to whether or not any of the goods covered by an Application are designed or modified to employ cryptography, use cryptographic techniques, to perform cryptographic functions, or to generate frequency-hopping codes.

**ItemEndUsers** – Export or reexport to prohibited end-uses or end-users.

**Item** – Goods, technologies, services, and know-how that are the object of controlled trade.

**ItemMake** – A brand of something, for example an appliance, car, or machine

**ItemModel** – A particular version of a manufactured article.

**ItemManufacturerProductNumber** – Refers to a code used to designate the classification of a particular Item that the Manufacturer or Maker assigns. Codes are derived from ManufacturerProductNumber and may take alpha, numeric, and alphanumeric forms.

- 338 **ItemProductType** – Refers to the type of Item an Applicant wants to export.
- 339 **ItemQuantityUnitOfMeasure** – Refers to the total number of goods declared as constituent parts  
340 of a single Item. CTML presently supports the following Units to describe Quantity: (1) Area, (2)  
341 Distance, (3) Mass, (4) SalesUnit, (4) Time, and Volume.
- 342 **ItemSalesUnit** – Refer to UnitsofMeasure for more information concerning SalesUnit.
- 343 **ItemSerialNumber** – Refers to a code that a provider or manufacturer assigns to an Item.  
344 SerialNumber may take alpha, numeric, and alpha-numeric forms
- 345 **ItemType** – Refers to the type of item that a TradingParty intends to transact [Are the Good  
346 Firearms].
- 347 **ItemUnitCost** – Refers to the cost for a single Item in an export license Application.
- 348 **ItemVolumeUnitOfMeasure** – Refer to <http://www.unece.org/trade/facil/tfcuom.htm> for more  
349 information related to Volume.
- 350 **ItemMassUnitOfMeasure** – Refer to ISO currency codes for additional information.
- 351 **ItemUnitOfMeasure** – UnitOfMeasure describes how the product is packaged or shipped. It must  
352 conform to UN/CEFACT Unit of Measure Common Codes. For a list of UN/CEFACT codes, see  
353 <http://www.unece.org/cefact>. Attachment contains a single URL with scheme “cid”.
- 354 **WeaponsMassDestruction** – Refers to items that are used in nuclear proliferation, missile  
355 technology proliferation, chemical and biological proliferation?

#### 356 **2.2.2.1 Services**

#### 357 **2.2.2.2 Biology**

#### 358 **2.2.2.3 Chemistry**

- 359 **ChemicalProductName** – [Insert definition here]
- 360 **ChemicalSynonym** – [Insert definition here]
- 361 **ChemicalProductCode** – [Insert definition here]
- 362 **ChemicalProductCode** – [Insert definition here]
- 363 **PrecautionaryLabels** – [Insert definition here]
- 364 **HazardRatings** – [Insert definition here], None, Mild, Strong, Severe, Extreme
- 365 **PrecautionaryStatement** – [Insert definition here], Danger Poison, Harmful if Inhaled, Causes  
366 Severe Burns , May Be Fatal if Swallowed, Reacts Violently with Water

DRAFT

367 **2.2.2.4 Devices**

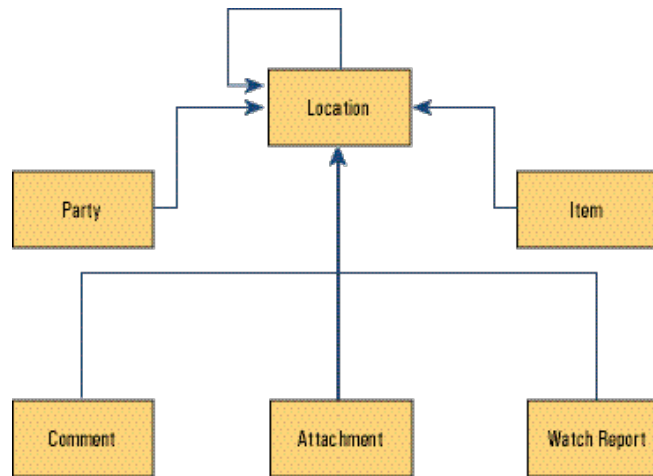
368 **2.2.2.5 Information**

369 **2.2.2.6 Materials**

370 **2.2.2.7 Medicine**

### 2.2.3 Location

Refers to the logical and physical means by which actors determine “where” something is within a particular context.



**LocationAddress** – A description of the location of a person or organization, as written or printed on mail as directions for delivery [Address Line].

**LocationContact** – Refers to the physical and logical location of a Party within CTML.

**LocationContactType** – CTML presently supports the following kinds of ContactLocations: (1) StreetAddress, (2) State, (3) City, (4) Country, (5) PostalCode, (6) PhoneNumber, (7) FaxNumber, (8) Email, and (9) URL, StreetAddress.

**LocationState** – Refers to a politically organized body of people usually occupying a definite territory.

**LocationCity** – Refers to an inhabited place of greater size, population, or importance than a town or village b: an incorporated British town usually of major size or importance having the status of an episcopal see c *capitalized* (1) the financial district of London (2) the influential financial interests of the British economy d: a usually large or important municipality in the U.S. governed under a charter granted by the state e : an incorporated municipal unit of the highest class in Canada.

**LocationCountry** – Refers to an indefinite usually extended expanse of land : 2 a : the land of a person's birth, residence, or citizenship b : a political state or nation or

**LocationPostalCode** – Refers to a group of letters and figures in a postal address to assist sorting.

**LocationPhoneNumber** – Refers to a number used to call a particular telephone.

**LocationFaxNumber** – Refers to a number used to call a particular facsimile machine.

**LocationEmail** – Refers to a number used to electronically send mail a particular person.

**LocationTelephoneNumber** – A simple reusable entity class that defines attributes of a telephone number.

**LocationURL** – Refers to an abbreviation for Uniform Resource Locator, the addressing system

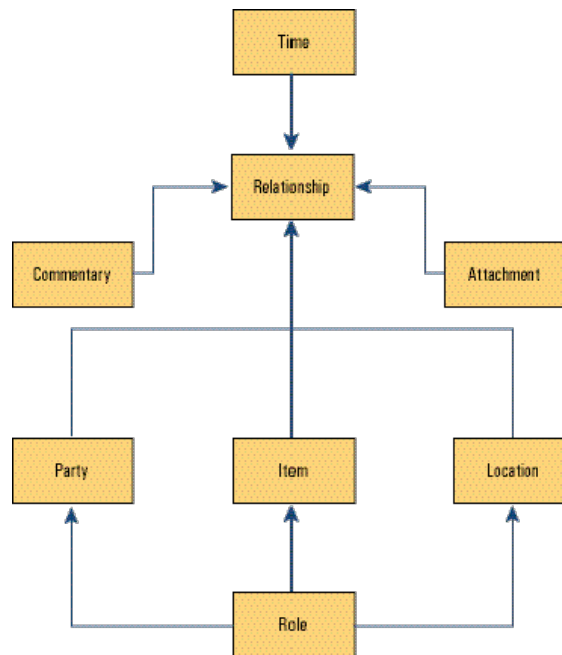


DRAFT

399 used for the World Wide Web.

## 2.2.4 Relationship

Refers to the connection between two or more people or groups and their involvement with each other, especially as regards to how they behave and feel toward each other, communicate, and cooperate.



**AgentOf** – Refers to an individual or organisation that acts as an authorised agent, dealer or distributor for an export license applicant [Authorized Agent Of].

**ClientOf** – Refers to an individual or organization using the services of another individual or organization.

**CustomerOf** – Refers to an individual or organization using the services of another individual or organization.

**AffiliatedWith** – Refers to an organization that is related to another organization through some type of control or ownership. For example, a U.S.–based company may have a foreign affiliate that handles overseas sales.

**BusinessPartnersWith** – Refers to a business owned by two or more individuals or organizations that agree on the method of distribution of profits and/or losses and on the extent to which each will be liable for the debts of one another. A partnership permits pass through of income and losses directly to the owners. In this way, they are taxed at each partner's personal tax rate.

**ControllingPartyFor** – Refers to the governmental activities that support national security concerns as they relate to controlled trade activities.

**DoesBusinessWith** – Refers to an organization or individual that interacts with another Party in order to derive benefit, normally in the form of money.

DRAFT

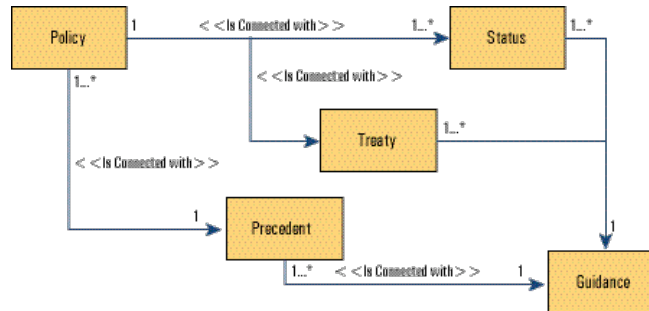
423 **PartnerOf** – a participant in a partnership or joint venture

424 **ProprietorOf** – the owner of a business.

425 **WorksWith** – Refers to an organization or individual that interacts with another Party in an  
426 undeclared capacity.

## 2.3 Political Components

Refers to the governmental goals and strategies related to civil administration.



### 2.3.1 Policy

**Policy** – A program of actions adopted by an individual, group, or government, or set of principles on which they are based.

**PolicyType** – [Insert definition here].

**PolicyName** – The name by which a program of actions adopted by an individual, group, or government, or set of principles on which they are based.

**PolicyNumber** – A unique reference associated with a program of actions adopted by an individual, group, or government, or set of principles on which they are based.

### 2.3.2 Statute

**LegislativeCategory** – Refers to the category under which the export is prohibited: (1) FireArms

**Statute** – A law established by a legislative body.

**StatuteType** – [Insert definition here].

**StatuteName** – The name by which a law established by a legislative body [Prohibited under S5].

**StatuteNumber** – A unique reference associated with a law established by a legislative body.

### 2.3.3 Regime

**RegimeList** – A mechanism for cataloging items of concern according to specific terms and agreements as codified in binding and nonbinding international agreements.

**RegimeListType** – The designation associated with

**RegimeListName** – The name used to denote a particular mechanism for cataloging items of concern.

**RegimeListNumber** – A designator used to identify a particular item of concern and its operational parameters.

**RegimeListContent** – Descriptive information used to define an item of concern, its application, and potential for use.

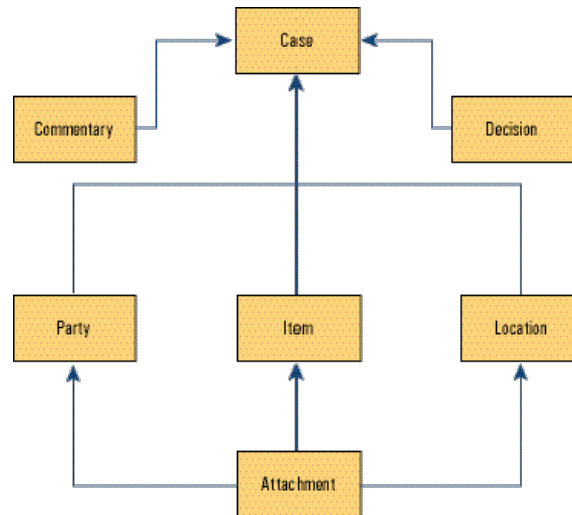
DRAFT

- 454 **RegimeListVersion** – A unique value assigned to an iteration of a particular RegimeList to  
455 account for changes in its content.
- 456 **PrecedentCase** – A controlled trade case that can be subsequently used as an example for a  
457 similar decision or to justify a similar action.

## 2.4 Regulatory Activities

### 2.4.1 Guidance

The legal and bureaucratic controlled trade processes that governments established in order to ensure that its national interests are protected.



**Case** – Refers to the basic accumulation of information in an export control activity. Cases are primarily built from other first class objects including Parties, Items, Locations, and Documents.

**CaseActivityType** – CTML presently supports the following types of Case ActivityType: (1) import, (2) Export, (3) Deemed, (4) Project, (5) Reexport, (6) Transit, and General.

**CaseHistory** – Refers to information the system records as part of an internal tracking mechanism against high-level objects like Case, Party, Item, Location, and Document.

**CaseOwner** – Refers to the system User who has Case management responsibilities over a particular Case.

**CaseStatus** – [Insert definition here]

**CaseSummary** – Is a summary of the items covered by a particular application.

**CaseType** – CTML presently supports the following types of Cases: (1) Undefined, (2) DualUse, (3) Munitions, and (4) Nuclear.

**CaseValue** – Refers to the total monetary value of the goods covered by an application expressed in words [Good Total Value].

**CommodityJurisdictionDeterminations** – Is used to determine whether an item or service is subject to the export licensing authority of a particular element of a national authority or government.

**CommerceControlList** – A section of the Commerce Department's Bureau of Export Administration's Export Administration Regulations that lists specific technologies and the countries to which those technologies may or may not be exported, along with any special restrictions or exceptions that may apply.

484 **ControlList** – Refers to a list of items under the export control jurisdiction of a national or  
485 international authority (e.g., Bureau of Export Administration, Ministry of Economy, or Wassenaar  
486 Regime). All commodities, technology or software subject to the licensing authority and are found  
487 list format.

488 **ControlListType** – Refers to source of authority for controlling particular items of interest. All  
489 commodities, technology or software subject to the licensing authority and are found list format.

490 **ControlListClassification** – Refers to designation a particular item of interest has assigned to it  
491 as it relates to operational parameters described in ControlLists.

492 **ControlListSensitivity** – Refers to a subjective sensitivity rating assigned to each item of  
493 interest.

494 **EndUseSummary** – Refers to a Case-level description of the nature of the Case.  
495 EndUseSummary provides a high-level description of how the EndUser intends to apply the  
496 goods, technologies, services, and know-how to a desired outcome state [Intended End-use of  
497 the Goods].

498 **ItemClassification** – Refers to a mode of rule or management based on commodity jurisdictions  
499 and subscribed to by international treaty ratification [Goods Rating].

500 **ItemClassificationRegime** – CTML presently supports the following regimes: (1) Undefined, (2)  
501 AustraliaGroup, (3) CWC, (4) NSG, (5) MTCR, (6) Wassenaar, and (7) EU.

502 **ItemECCN** – Refers to a code used to designate the classification of a particular item. Codes are  
503 derived from ControlLists and may take alpha, numeric, and alphanumeric forms [Item Rating].

504 **ItemMilitaryUse** – An assertion as to whether or not any of the goods are specially designed or  
505 modified for military use, or specially designed or modified for the development, production or use  
506 of military goods.

507 **ItemMilitaryProduction** – An assertion as to whether or not any of the goods are specially  
508 designed or modified for the development or production of military goods.

509 **ItemNuclearUse** – An assertion as to whether or not any of the goods are specially designed or  
510 modified for nuclear use.

511 **ReceivedDate** – Refers to the calendar date that a national export licensing authority receives an  
512 export license application.

513 **TotalCost** – Refers to the total value of the transaction in question. This is not a sum of all  
514 declared items on an export license application. Instead, it represents the value of all controlled  
515 and uncontrolled goods, technologies, services, and know-how that compose the total  
516 transaction.

517 **MilitaryItemProduction** - An assertion as to whether or not any of the goods are specially  
518 designed or modified for the development or production of military goods.

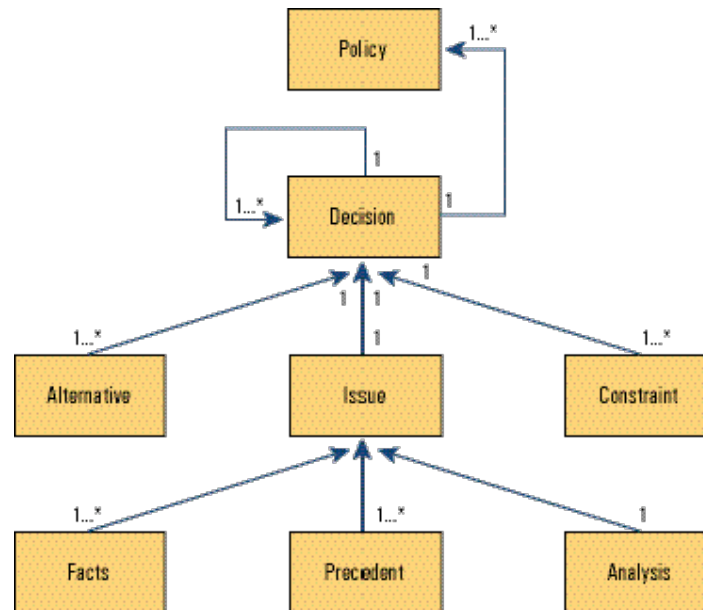
519 **MIP details** - details of goods or specially designed or modified for the development or production  
520 of military goods.

521 **Modified for nuclear use** - An assertion as to whether or not any of the goods are specially  
522 designed or modified for nuclear use.

523 **NUC Details** - Details of goods specially designed or modified for nuclear use.

## 2.4.2 Determination

Refers to the final disposition of a controlled trade case.



**CaseConditions** – Refers to constraints that an exporting government places on a particular controlled trade activity to help guarantee that items of interest will be used according to its stated application [Provisos]

**CaseAgencyDecision** – Refers to an organization that provides either a Position or Decision regarding the final disposition of an export license application.

**CaseAgencyPosition** – Refers to an organization that provides either a Position or Decision regarding the final disposition of an export license application. Positions are nonbinding in nature [Advice].

**CaseEscalate** – Refers to indecision or disagreement within a national authority vis-à-vis a particular controlled trade case. In this situation, agencies refer decision-making responsibility to higher authorities. This typically involves political decisions.

**CaseConditionType** – CTML presently supports the following Conditions: (1) Undefined, (2) Activate, (3) Deactivate, (4) Remand, (5) Revoke, and (6) Withdraw.

**CaseDecision** – Refers to the final disposition that an authority makes against a particular export license Application.

**CaseDecisionType** – CTML presently supports the following types of Decisions: (1) Undefined, (2) Approve, (3) Disapprove, (4) ApproveWithConditions.

**CaseDecisionMaker** – Refers to the individual authorized that renders a binding opinion regarding a particular export control license for a particular organization.

**CasePosition** – Refers to a nonbinding opinion regarding a particular export control license that represents a particular organization.

**CasePositionType** – CTML presently supports the following Position TYPE: (1) Undefined, (2)



549 Approve, (3) Disapprove, (4) ApproveWithConditions.

550 **CasePositionMaker** – Refers to the individual authorized that renders a binding opinion  
551 regarding a particular export control license for a particular organization.

552 **CaseRationale** – Refers to an explanation of controlling principles of opinion, belief, practice, or  
553 phenomena that support a CTML User recording a particular piece of information. Normally  
554 Rationale is used to support decision-making.

555 **RelatedPolicy** – Refers to related programs of actions adopted by an individual, group, or  
556 government, or the set of principles on which they based.

557 **RelatedIssues** – Refers to an organization that provides either a Position or Decision regarding  
558 the final disposition of an export license application.

559 **RelatedConstraint** – Refers to related conditions placed on controlled trade activities that limit  
560 the freedom to act spontaneously.

561 **RelatedCases** – Refers to a controlled trade activity that has been processed and that is  
562 germane to the Case in question [Previous Application References].

### 2.4.3 Instruction

Refers to the definition, assignment, and monitoring of work within a controlled trade system.

**TaskName** – A human-readable reference associated with any piece of work that is assigned as part of a controlled trade activity.

**TaskPriority** – The relative ranking of work associated with any controlled trade activity.

**TaskCategory** – A group or set of things, people, or actions that are classified together because of common characteristics and associated with a particular controlled trade activity.

**TaskStartDate** – The date on which a task is scheduled to begin.

**TaskEndDate** – The date on which a task is scheduled to end.

**TaskDueDate** – The date on which a task is scheduled needed or requested.

**TaskType** – A designator to classify work in a controlled trade activity.

**TaskStatus** – The relative position or standing of a unit of work as part of a controlled trade activity.

**TaskFrequency** – The number of times that work happens during a particular period of time.

**TaskCarryOver** – A designator indicating whether or not work may be “carried over” to a new period.

**TaskRepeat** – A designator indicating whether or not work may repeat as part of a controlled trade activity.

**TaskRecurseEvery** – A designator indicating the frequency at which work can repeat as part of a controlled trade activity.

**TaskRecurseOn** – The date on which controlled trade work recurs.

**TaskRelatedParty** – Persons and Organizations that participate in controlled trade work in some capacity.

**TaskRelatedItem** – Items that are associated with controlled trade work in some capacity.

**TaskRelatedLocation** – Locations that are associated with controlled trade work in some capacity.

**TaskRelatedWorkitem** – Workitems that are associated with controlled trade work in some capacity.

#### 2.4.4 Verification

Refers to the activities involved in determining whether or not an item of interest has been delivered to its intended recipient and is being used according to the stated purpose.

**BillOfLading** – An assertion as to whether or not all goods covered by an application are being shipped under an airway bill or through a bill of lading from the originating country to their final destination.

**DepartureDate** – Refers to the date on which it is proposed to export the goods [Proposed Date of Shipment].

**DeliveryQty** – Refers to the quantity of items delivered to a particular recipient as compared to the authorized amount (Note: this is the amount typically declared on an export application).

**DeliveryValue** – Refers to the cumulative value of items delivered to a particular recipient.

**DeliveryStatus** – Refers to the current status of a particular item of interest.

**DeliveryStatusType** – (1) Accounted, (2) Unaccounted, (3) Returned. [Goods Returned].

**DeliveryDescription** – Refers to supplemental information describing the state of delivery for items of concern.

**DeliveryVerificationCertificate** – Certify the arrival of strategic commodities in a particular location.

**DeliveryEndUserCertificate** – Documentation normally provided by government representatives from an importing country declaring that particular good were delivered to the intended recipient, in the declared location, for their stated purpose.

**DestinationControlStatement** – Documentation provided by an applicant in an control trade activity asserting where the final destination of an item of interest is.

**InternationalImportCertificate** – For the purpose of controlling imports and exports of strategic commodities (Please see Note), Hong Kong importers may be asked by overseas buyers (who, in turn, are so required by the licensing authorities of the exporting country) to obtain an IIC. On the IIC, the Hong Kong importer undertakes that the goods mentioned therein will be imported into Hong Kong and will not be diverted, transhipped or re-exported except under the authority of an export licence issued

**RouteFromCountry** – Refers to the country of departure on the leg of an export route.

**RouteToCountry** – Refers to the country of arrival on the leg of an export route.

**TransportType** – Refers to the type of transport used for a leg of the export route: (1) Air, (2) Rail, (3) Road, (4) Sea.

**ShippersExportDeclarations** –

## 2.5 Industry Activities

Refers to the activities, processes, instruments, and procedures that are performed by persons and organizations that intend to engage in controlled trade activities.

### 2.5.1 Export Management

**ExportManagementSystem** – An optional program a company can consider establishing to ensure that their exports and export decisions are consistent with national laws and regulations.

**EMSAdministrativeElements** – Documents that attest to the completion of various checks done within an organization as part of export control activities. These elements also ensure that the personnel responsible for compliance are given authority commensurate with their responsibilities and receive all necessary training.

**EMSAdministrativeElements** – Includes stated Management Policy, Responsible Officials, Recordkeeping, Training, Internal Reviews, and Notification within a company.

**EMSInternalReview** – An internal review program to verify compliance with the firm's Export Management System and the Export Administration Regulations.

**EMSTraining** – An ongoing program of training and education to all employees, domestically and internationally, that supports complies with export law, regulatory requirements, EMS procedures.

**EMSDistributionProcedure** – Ensures all appropriate users receive the tool and instructions for use.

**EMSManagementPolicyStatement** – A clear statement of management policy communicated to all levels of the firm involved in exportreexport sales, traffic and related functions, emphasizing the importance of compliance with the Export Administration Regulations.

**EMSNotification** – A system for notifying designated officials of possible non-compliance with the national export control laws and regulations. A system for consulting with national trade authorities when questions arise regarding the propriety of specific export transactions.

**EMSReviewSchedule** – The assigned times when an internal audit of a company's EMS is to be performed.

**EMSRecordkeeping** – A program required by the national laws to manage administrative records related to export activities.

**EMSReviewModule** – A tool created for exporters to use to verify ongoing performance of EMS responsibilities.

**EMSTraining** – A continuing program for educating people who require knowledge of the Export Regulations.

### ExportAdministrationBulletin

**HoldFunction** – Implemented within the order processing system that stops an order until a decision is made as to whether a license is required.

## 2.5.2 Process Compliance

Refers to the activities necessary to ensure that risk is managed prior to governmental determination for any controlled trade activity, and to ensure that information is complete and accurate enough for such a determination to be made.

**AntiboycottComplianceScreen** – A method to review orders against antiboycott compliance red flags.

**BiologicalWeaponsScreen** – Process to determine if there are there indications that the customer is directly or indirectly involved in the design, development, production, stockpiling or use of biological weapons.

**ChemicalWeaponsScreen** – Process to determine if there are there indications that the customer is directly or indirectly involved in the design, development, production, stockpiling or use of chemical weapons.

**CountryDeterminationScreen** – A system for assuring compliance with export licensing decisions, product/country restrictions, License Exception Parameters, and License Conditions.

**CommitmentsListCheck** – An assertion as to whether or not an Application has been checked against the list of policy commitments and the result of that check.

**DeniedPersonsScreen** – Is a methodology for review of orders/shipments/transactions against the DPL. Is a list of entities that have been denied export privileges to some degree [Denials List Check].

**DeniedPersonsList** – Engaging in actions prohibited by a denial order.

**DiversionRiskScreen** – Refers to reviewing orders against a Diversion Risk Profile (DRP).

**EntityList** – A list of entities that are known to be engaging in actions prohibited by a denial order.

**EntityListScreen** – Refers to a procedure to review customers and other Parties against the Entity List.

**RiskScreens** – Assessment of risk associated with any particular proposed export control transaction. Activity that ensures that exporters do not conduct business with individuals and organizations where national authorities have informed the exporter or the public at large that the transaction involves an unacceptable risk of use in, or diversion to, prohibited proliferation activities anywhere in the world.

**MissileTechnologyScreen** – A system for assuring compliance with the prohibited missile end users/ users.

**NuclearScreen** – A system for assuring compliance with the prohibited nuclear end uses/users.

### 2.5.3 Transaction Compliance

Refers to information describing the execution of a controlled trade activity and its conforming to conditions placed upon it through government determination.

**Application** – A formal and usually written request for permission to trade sensitive items.

**Applicant** – The entity that is the principal party in interest in the export transaction, has the power and responsibility for determining and controlling the sending of the items out of a name place.

**ApplicationDate** – Refers to the calendar date that a national export licensing authority creates an export license application.

**ApplicationNumber** – Refers to the unique designation that a national export licensing authority assigns to a particular export license application.

**BaggageExportLicenseException** – This export license exception authorizes individuals leaving a country to take to any destination, as personal baggage accompanied or unaccompanied, personal effects (clothing, souvenirs, games), household effects (furniture, etc.), vehicles, and tools of trade (for use in the trade, occupation, employment, vocation, or hobby).

**BiologicalWeaponsActivities** – Any activity involved in design, development, production or use of biological weapons.

**BlacklistedCompany** – Refers to a Party that is no longer permitted to engage in trade activities for national security reasons.

**CancelFunction** – Implemented within the order processing system that terminates an order.

**ChemicalWeaponsActivities** – Any activity involved in design, development, production or use of chemical weapons.

**CountryChart** – A chart that contains certain licensing requirements based on destination and reason for control.

**DeemedExport** – Any release of technology or source code to a foreign national. Such release is deemed to be an export to the home country or countries of the foreign national.

#### DiversionRiskProfile

**DualUse** – When a commodity, technology, or software has both commercial and military or other strategic applications (e.g., nuclear). Such items are subject to export control by national authorities based on criteria set forth in the Commerce Control List.

**License** – Permission issued by a granting governmental authority to an applicant for export, reexport, or other regulated activity.

**LicenseException** – An authorization that allows you to export or reexport, under stated conditions, items that otherwise would require a license.

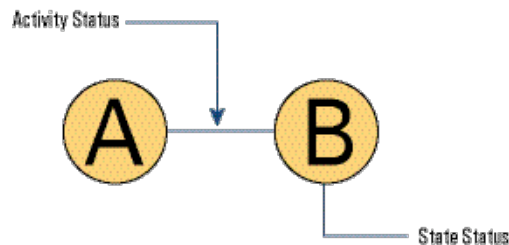
**LicenseExpirationDate** – Refers to the calendar date beyond which the License is no longer valid.

**LicenseFee** – Money that an applicant provides to a government in exchange for the privilege to participate in controlled trade activities.

- 730 **LicenseIssueDate** – Refers to the calendar date on which a national licensing authority issues  
731 an approved Case (i.e., License) to an Applicant.
- 732 **LicenseNumber** – Refers to a code used to designate particular Case once it has been  
733 approved. Codes are derived from either internally generated serialization or lists external to the  
734 export control system. LicenseNumber may take alpha, numeric, and alpha–numeric forms.
- 735 **LicenseType** – Permission issued for particular kinds of activities such as Import, Export, Transit,  
736 Project, Deemed, Reexport, Standard Individual Export License (SIEL), Open Individual Export  
737 License, Open General Export License (OGEL), or Know–how [UK License Type].
- 738 **MissileTechnologyActivities** – Any activity involved in design, development, production or use  
739 of missiles in or by a country.
- 740 **OrderProcessingElement** – An order processing system that documents employee clearance of  
741 transactions in accordance with the requirements of the firm's Export Management System.
- 742 **PreorderEntryScreenChecks**
- 743 **ProductDeterminationScreen** – A system for assuring compliance with export licensing  
744 decisions, product/country restrictions, License Exception Parameters, and License Conditions.
- 745 **RedFlagIndicators** – Refers to abnormal circumstances in a transaction that indicates that the  
746 export may be destined for an inappropriate end–use, end–user or destination.
- 747 **ResponsibleOfficial** – Identification of positions and specific individuals responsible for  
748 compliance with the Export Administration Regulations.
- 749 **SpecialComprehensiveLicense** – A special license authorizing export of eligible items to  
750 approved consignees or end customers in specified countries, without dollar value or quantity  
751 limits
- 752 **SelfAssessmentTool** – An instrument that industry uses to conduct an internal audit of their  
753 export control activities.
- 754 **ScreeningFrequency** – The frequency with which an export control official performs nuclear  
755 screens, missile technology screens, chemical & biological weapons screen, product/country  
756 licensing determination screen performed, and diversion risk screens.

## 2.6 Process

Refers to the business rules established within governments and industry that allow actors to conduct controlled trade activities. A series of actions directed toward a particular aim within controlled trade activities.



**ActivityStatus** – Refers to condition or status of any activity within a controlled trade process.

**ProcessWorkFlow** – Refers to a means of tracking work within a trade control system.

**ProcessWorkGraph** – A means of logically representing the steps in an trade control process.

**ProcessBeginState** – The first step in a process.

**ProcessState** – The condition that something or somebody is in at a particular time.

**ProcessTransition** – A process or period in which something undergoes a change and passes from one state, stage, form or activity to another.

**ProcessName** – A word, term, or phrase by which one State is known and distinguished from another.

**ProcessVersion** – A particular form or variety of a state or process that is different from others and from the original.

**ProcessDisplayKey**

**ProcessFromState** – The condition that a workitem leaves as part of a defined controlled trade process.

**ProcessToState** – The condition that a workitem enters as part of a defined controlled trade process.

**ProcessEntryGuard** – Refers to conditional logic that ensures that particular business rules are satisfied before a workitem can transition from the ProcessFromState to the ProcessToState.

**ProcessExitGuard** – Refers to conditional logic that ensures that particular business rules are satisfied before a workitem can transition from one state and enter another.

**ProcessTransitionGuard** – Refers to customizable business logic that places constraints on the transition between two states.

**ProcessClass** – Refers to the programming language required to implement custom business logic.

**ProcessData** – Refers to [Insert definition here].

**ProcessDescription** – Human readable description of the process element in an export control



DRAFT

788 activity.

789 **ProcessPosition** – Meta information to support visual workflow builders.

790 **ProcessDeprecated** – Meta information to aid in the support of workflow versioning and schema  
791 evolution.

792 **StateStatus** – Refers to condition or status of any state within a controlled trade process

## 2.7 Commentary

Refers to free form textual information that is related to a controlled trade activity.

**CommentAuthor** – Refers to the person or organization that writes the text of a work. [Insert List of DocumentTypes Here].

**Comment** – Information provided by CTML Users that allow amplifying or clarifying remarks to particular pieces of information like Cases, Parties, Items, Locations or other first class objects within the system. Arbitrary human-readable information buyers can send within purchase orders. This string data is not intended for the automated systems at supplier sites. The Comments element can contain an Attachment element for including external files. [Insert List of DocumentTypes Here]

**CommentType** – CTML presently supports the following kinds of Comments: (1) Technical, (2) Evaluation, (3) Note, (4) RatingComment, (5) Position, (6) Decision, and (7) ItemDisposition [Reason for Goods Being Returned].

**Comment** – Comments can attach external files to augment first class objects. The Attachment element appears within Comments, and it contains only a reference to the external MIME part of the attachment. [Insert List of CommentType Here]

**DocumentSource** – Refers to the URL where data is contained. [Insert List of DocumentTypes Here].

**SuspectWMDUse** - An assertion as to whether or not the Applicant has grounds for suspected that the goods are or may be intended, wholly or in part for use in connection with chemical, biological or nuclear weapons, and/or any purpose connected with missiles capable of delivering such weapons.

**WMD Details** - Details, including the date, source and official reference number of any correspondence that give grounds for suspecting WMD use.

**UndergoneProofmarkchecks** - An assertion as to whether or not firearms to be exported have undergone checks in accordance with the convention of 1st July 1969 on reciprocal recognition of proof marks.

---

## 3 References

### 3.1 Normative

- [XML 1.0]** W3C Recommendation February 1998,  
**[RFC2119]** S. Bradner, *Key words for use in RFCs to Indicate Requirement Levels*,  
<http://www.ietf.org/rfc/rfc2119.txt>, IETF RFC 2119, March 1997.
- [Unicode v3.2]** Members of the Editorial Committee,  
<http://www.unicode.org/unicode/reports/tr28/>, March 2002.
- [ISO 7372]** Trade Data Elements Directory (TDED 1993, Vol. I – Standard Data Elements), 1993.
- [ISO 9735]** Electronic data interchange for administration, commerce and transport (EDIFACT) – Application level syntax rules.
- Money –** Refer to ISO currency codes for additional information.  
**[ISO 639]** A language code as defined by the XML 1.0 Specification (at [www.w3.org/TR/1998/REC-xml-19980210.html](http://www.w3.org/TR/1998/REC-xml-19980210.html)).
- [ISO 3166]** Country Code,  
<http://www.iso.org/iso/en/prodsservices/iso3166ma/index.html>, date year.

---

## Acknowledgments

The following individuals were members of the committee during the development of this specification:

- Russell Bailey, FGM Inc.
- Jon Borrás, eEnvoy
- Jon Bosak, Sun Microsystems
- Jean-Luc Champion, Chair UN/EDIFACT D2 WG (Purchasing)
- Dena Cocos, Logistics Management Institute
- Thomas Fergus, Commonwealth Trading Partners
- Glenn Golding, Department of Trade and Industry
- Christopher Gopal, Unisys
- Todd Harbour, Chair, Controlled Trade Markup Language, FGM Inc.
- Joannette Oosterhout, FGM Inc.
- Sue Probert, Commerce One
- Steven Saboe, U.S. Department of State
- Christian Stadler, SAP International
- Jonathan Weitz, Synapra

In addition, the following people made contributions to this specification:

- Kathleen Yoshida, FGM Inc.
- Francois Vuilleumier, ISO Technical Committee No. 154
- William Nolle, World Customs Organization, Container Working Group
- Dale Barone, Commonwealth Trading Partners

---

## Appendix A. Revision History

Rev	Date	By Whom	What
wd-00	2002-07-22	Todd Harbour	Initial version

## Appendix B. Regulatory Actors Illustration



### Case Officer

CASE OFFICERS are case owners who are responsible for determining the final case position. Case Officers have decision making authority and may refer cases to persons within or outside of their agency for positions and/or recommendations.



### Referral Officer

REFERRAL OFFICERS receive cases referred by Case Officers. Referral Officers are responsible for determining the final agency position for the agency they represent. If Referral Officers need additional information they can refer cases to persons within their agency for positions and/or recommendations.



### Service Officer

SERVICE OFFICERS are referred cases by Referral Officers in Defense organizations. Service Officers are responsible for determining a final Service position for the Service they represent (Army, Air Force, Navy, etc.). If Service Officers need additional information they can refer cases to persons within their Service (Army, Air Force, Navy, etc.) for positions and/or recommendations.



### Routing Officer

ROUTING OFFICERS review work items and select and/or approve work item staffing.



### Analyst

ANALYSTS are technical regional, or other persons whose insight about a case is requested. Analysts can comment on a case and make recommendations or log positions.



### Supervisory Officer

SUPERVISORY OFFICERS are managers of Case Officers who have the authority to perform certain acts, such as initiating an escalation or dispute resolution process, reassign work items, configure certain system settings, and grant certain user permissions.



### Countersigner

COUNTERSIGNERS review Case Officers' recommendations or positions, and approve or direct override of the recommendation or position. In some offices countersigners are the peers of Case Officers, in others they are supervisors.



### Computer Specialist

COMPUTER SPECIALISTS do not have direct input into the export licensing process, but rather maintain sustained systems at various agencies and departments.



### Coordinator

COORDINATORS are responsible for gathering and distributing relevant case data; inputting case data into an automated expert licensing system; and performing case-related activities at the request of Case Officers.



### Outside Source

OUTSIDE SOURCES are contacts of Case Officers who are able to answer questions or make recommendations about a case. Outside Sources are not within the same agency or department as the Case Officer.



### Inside Source

INSIDE SOURCES are associates of Analysts who are able to answer questions or make recommendations about a case. Inside Sources are within the same Agency as the Analyst.



### Committee Chairs

COMMITTEE CHAIRS are the lead members of interagency committees. Examples of typical committee chairs include escalation committees.



### Committee Members

COMMITTEE MEMBERS participate in one or more of the three interagency committees. Committee Members may be voting and non-voting members of escalation groups.



### Escalation Committee Staff

Escalation Committee Staff are committee staff members who assist the committee chairs evaluate escalated cases.



### Administrative Staff

ADMINISTRATIVE STAFF perform clerical and administrative duties.



### Applicant

APPLICANTS request licenses or other determinations from the export control authorities. An Applicant can be a member of industry who has the authority of a principal party of interest to determine and control the export or reexport of items. An Applicant can also be a member of the government or a foreign government.



### Enforcement Officer

ENFORCEMENT OFFICERS are members of Export Enforcement who investigate parties who might be involved in the illegal export of commodities.



### Director

DIRECTORS are agency or department heads with management and oversight responsibilities. Directors may be required to make case decisions in the event of recommendation or position disputes.



### Compliance Technician

COMPLIANCE TECHNICIANS are enforcement analysts who record parties within the system.



### Communications Officer

COMMUNICATIONS OFFICERS send cables to embassies and consulates.



### Users

USERS are members of the export control community who access the system in order to process work items, access data, or otherwise maintain the system.

---

## Appendix C. Notices

OASIS takes no position regarding the validity or scope of any intellectual property or other rights that might be claimed to pertain to the implementation or use of the technology described in this document or the extent to which any license under such rights might or might not be available; neither does it represent that it has made any effort to identify any such rights. Information on OASIS's procedures with respect to rights in OASIS specifications can be found at the OASIS website. Copies of claims of rights made available for publication and any assurances of licenses to be made available, or the result of an attempt made to obtain a general license or permission for the use of such proprietary rights by implementors or users of this specification, can be obtained from the OASIS Executive Director.

OASIS invites any interested party to bring to its attention any copyrights, patents or patent applications, or other proprietary rights which may cover technology that may be required to implement this specification. Please address the information to the OASIS Executive Director.

**Copyright © 2002 The Organization for the Advancement of Structured Information Standards (OASIS). All Rights Reserved.**

This document and translations of it may be copied and furnished to others, and derivative works that comment on or otherwise explain it or assist in its implementation may be prepared, copied, published and distributed, in whole or in part, without restriction of any kind, provided that the above copyright notice and this paragraph are included on all such copies and derivative works. However, this document itself does not be modified in any way, such as by removing the copyright notice or references to OASIS, except as needed for the purpose of developing OASIS specifications, in which case the procedures for copyrights defined in the OASIS Intellectual Property Rights document must be followed, or as required to translate it into languages other than English.

The limited permissions granted above are perpetual and will not be revoked by OASIS or its successors or assigns.

This document and the information contained herein is provided on an "AS IS" basis and OASIS DISCLAIMS ALL WARRANTIES, EXPRESS OR IMPLIED, INCLUDING BUT NOT LIMITED TO ANY WARRANTY THAT THE USE OF THE INFORMATION HEREIN WILL NOT INFRINGE ANY RIGHTS OR ANY IMPLIED WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE.