

[Company Letterhead]

[Date]

[Name of Recipient]

[Title]

[Company/Organization Name]

[Address]

[City, State, Zip Code]

Re: ITAR Jurisdictional Determination and Compliance Opinion

Dear [Name],

This letter provides a formal opinion regarding the regulatory status of [Description of Product/Technology/Service] (the "Subject Matter") under the International Traffic in Arms Regulations (ITAR), 22 C.F.R. Parts 120-130.

1. Description of Subject Matter

The Subject Matter consists of [Detailed Technical Description, including specifications and intended end-use].

2. Analysis of the United States Munitions List (USML)

We have reviewed the Subject Matter against the categories set forth in 22 C.F.R. § 121.1. Based on our technical assessment, the Subject Matter [is / is not] specifically enumerated, described, or otherwise included in any USML Category. Specifically, we have considered Category [Insert Category Number] and determined that [Reasoning for inclusion or exclusion].

3. Determination of Jurisdiction

Based on the foregoing analysis, it is our opinion that the Subject Matter is:

[Option A: Subject to the jurisdiction of the Department of State under the ITAR and classified under USML Category (Number).]

[Option B: Not subject to the jurisdiction of the ITAR and is instead subject to the Export Administration Regulations (EAR) maintained by the Department of Commerce, classified under ECCN (Number).]

4. Compliance Requirements

In light of this determination, [Company Name] must adhere to the following:

- [Registration requirements with the DDTC, if applicable]
- [Requirement for export licenses or technical assistance agreements]
- [Restrictions on access by Foreign Persons]

5. Conclusion

This opinion is based on the current regulations and the technical information provided as of the date of this letter. Any changes in the design, functionality, or end-use of the Subject Matter may require a re-evaluation of this status.

Sincerely,

[Signature]

[Name of Authorized Official]

[Title]

[Contact Information]