# International Regulatory Bulletin BRYAN CAVE



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A Broader Perspective

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To: Our Clients and Friends

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## The Directorate of Defense Trade Controls to Launch DTrade2

Last week DDTC issued a notice to DTrade users that it will be launching its new and improved internal case management system, DTrade2, on April 16, 2009.

Once DTrade2 is launched, all new license applications must be submitted via this improved system. The old DTrade will remain active for users to track or upload supplemental information to applications submitted prior to April 16, 2009. Any new submissions that are uploaded through the old DTrade system after April 16, 2009 will be Returned Without Action by DDTC.

DDTC advises that, for the most part, changes made to the DTrade2 system should have little impact on the user. However there are a few noteworthy changes that will be made with the rollout of DTrade2, which are as follows:

- DTrade2 will rollout the new license amendment forms (DSP-6 will be the amendment to the DSP-5, DSP-62 will be the amendment to the DSP-61, and DSP-74 will be the amendment to the DSP-73).
- DDTC will no longer accept paper DSP-119 forms. DDTC is also moving away from the use of ELLIENet to submit a DSP-119. Any DSP-119s submitted via ELLIENet will continue to be available for approximately 60 days after the launch of DTrade2. A notice will be posted when submissions of DSP-119s via ELLIENet will no longer be accepted.
- DDTC has revised all license application forms to update expiration dates, expand country selections, include reference to disclosure information, and update the Applicant Statement to refine the Transaction Exception statements.
- Users must use their DDTC-approved registrant/applicant name which corresponds to their DDTC registration record. A new DTrade2 software security feature will check the DDTC's registration records to confirm that the name submitted on the request matches DDTC's official records. If a match is not made, the DTrade2 system will automatically reject the application or amendment and preclude its submission to DDTC.

Please be sure to visit DDTC's website to download and review the new and/or updated forms in order to familiarize yourself with the new documents before they are launched. Doing so should smooth the transition for you and your company from DTrade to the new DTrade2 system. DDTC's complete announcement is available on its website at: http://www.pmddtc.state.gov/.

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