



PROFESSIONAL ASSOCIATION OF EXPORTERS & IMPORTERS

PAEI Eighteenth Annual Membership Meeting

On Thursday, December 8, 2005, PAEI held its 18th Annual Membership Meeting at the Biltmore Hotel and Suites. Around 40 members attended. Everyone had the holiday spirit! This is the first time in a very long time that almost all of the attendees stayed until the very end! The food was great, the door prizes were fabulous, and of course the company was wonderful!

PAEI would like to thank the following companies who donated prizes that were raffled off: **FedEx, MK Denial, NVidia and Trade Resources & Associates.**

PAEI recognized Cindy Shull Lakey for her contributions to the BIS/PAEI programs and her many other contributions to PAEI.



More pictures continued on page 3 & 4

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details, membership information, and
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P.A.E.I. NEWSLETTER

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*Articles for publication, letters to the editor, and requests for copies should be submitted to dan.kromat@ksicorp.com, or on diskette to the P.A.E.I. PO Box in San Jose. Articles must be submitted to the Editor NLT the 3rd of each odd month, Newsletters will be emailed the 1st of each even month. P.A.E.I. does not guarantee the accuracy of the contents of this publication. For further information concerning the topics in the newsletter consult the applicable regulations or your local Department of Commerce or Customs representative.
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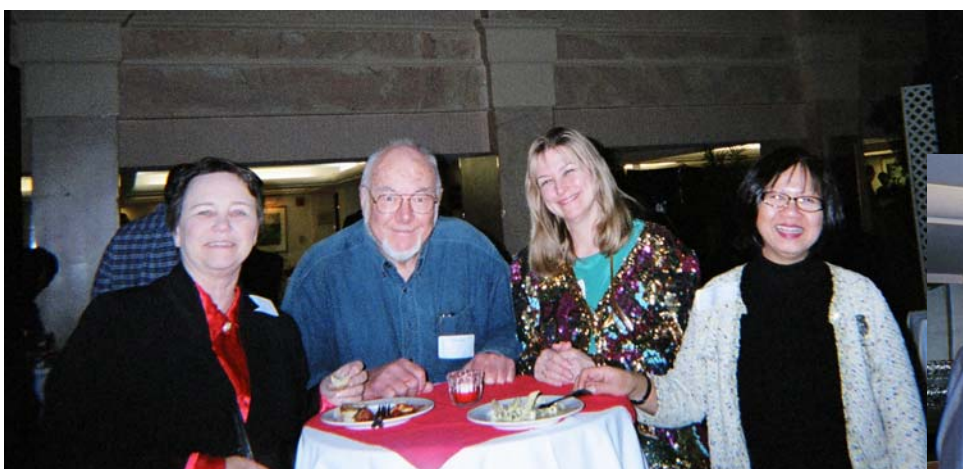
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Thanks again to Lydia Bostillo for coordinating the Annual Membership Meeting. Lydia gathered all the great prizes that were raffled off during the evening and arranged the meeting at The Biltmore Hotel and Suites.

Thanks to all who attended, and we hope to see all the PAEI members attend next year!





**“Export Compliance for Forwarders”
&
“Legal Issues Between
Exporters & Forwarders”
with
“Best Practices & Lessons Learned”**

By Jo-Anne Daniels, PAEI Director

November 8, 2005 PAEI presented a morning and afternoon seminar geared to forwarders and exporters.

PAEI welcomed Jo Allyn Scott from the Department of Commerce Bureau of Industry and Security (BIS), Mike Turner from BIS, and Joey Morales from the Foreign Trade Division to speak about export compliance for forwarders.

Ms. Scott provided key elements to forwarders in regard to their compliance role. She reviewed the scope of the export regulations and advised how forwarders are legally responsible. She also reviewed problem transactions, red flag indicators and current penalties as well as FTSR rewrite and the penalty provisions.

Mr. Turner gave an overview of enforcement goals and some fascinating case examples. He spoke about a real life example of an exporter who sold commercial trigger spark gaps and related how a nuclear proliferator was interested in buying a large quantity of them from this U.S. medical company to be used in the Pakistan nuclear weapons program. This was a good example of how a company paid attention to “Red” flags and avoided a situation which might violate the law, see BIS website

<http://www.bis.doc.gov/Enforcement/knowcust.htm>

The company cooperated with OEE and the transaction was stopped; the proliferators were foiled.



Mr. Morales spoke about AES (Automated Export System), who can file, and what are the reporting options and responses, e.g. fatal or warning errors. He advised forwarders that ITN (Internal Transaction Numbers) that are accepted in the system can also be verified by Customs & Border Protection. CBP can verify whether the ITN number is valid. Mr. Morales also reported that exporters or forwarders can actually file all items exported even if they are destined to Canada or under \$2500 and Census will kick out the items that are not required to be filed. Lastly he discussed the new penalty provisions and delegation of authority between BIS and CBP. Civil penalties for late AES filing are assessed up to \$1,000 per day or up to maximum of \$10,000 per violation for USPPI (U.S. Principal Party in Interest), authorized agent or carrier found culpable.

The afternoon program presented the legal issues and best practices and the speakers were John McKenzie from Baker & McKenzie, Cindy Shull Lakey from MKdenial, Elaine Osborne from Linear Technology and Jo-Anne Daniels from Trade Resources & Associates.

Mr. McKenzie explored the exporter and freight forwarder compliance myths and explained the legal responsibilities for both parties. He reviewed in detail the forwarding agent's responsibility in a Routed Export Transaction. Mr. McKenzie counseled forwarders against applying for an export license on behalf of foreign parties in a routed export transaction or providing export classification opinions because this exposes them to liability and penalties. He concluded his presentation with the recent freight forwarder export enforcement cases.

Ms. Shull Lakey spoke about best practices to protect the freight forwarder and exporter. These practices included providing adequate resources & training, developing procedures for evaluating shared processes and obtaining written assurances. As part of the presentation, she

provided a sample Written Assurance to demonstrate how exporters can insure that 3rd party logistic companies or forwarders properly represent the export control documents to the U.S. government agencies. Ross & Associates kindly authorized the use of their template.

Elaine Osborne from Linear Technology presented "Lessons Learned" about her personal experience with a forwarder. Her advice to exporters is to insure that the data supplied by the forwarder is submitted correctly to Census. She related an experience with her company's forwarder who altered export paperwork and what corrective action she took to prevent this from reoccurring.

Jo-Anne Daniels from Trade Resources & Associates presented the twelve industry best practices which appeared in the Federal Register in 2003 and BIS continues to hold these best practice standards. Best practices range from developing a written policy against allowing exports or services to contribute to terrorism or proliferation concerns to resolving any questions raised by the transaction related to "Know Your Customer Guidance and Red Flags." For further information, please see

http://www.bis.doc.gov/ComplianceAndEnforcement/FRBestPraCmtsReq5_16.html

Many thanks to Cindy Shull Lakey for organizing and leading this double program.

This article was prepared by Jo-Anne Daniels, President of Trade Resources & Associates, in El Granada, CA.

She can be reached at tra3332003@yahoo.com or at 650-726-6764, or <http://www.trade-resources.com/>

Entries Without Proper Commercial Invoices

By George R. Tuttle, III

(this article first appeared in the November 9, 2005 Tuttle Law Offices Newsletter)

I am often asked to review a company's compliance with U.S. import requirements. A problem I frequently find is that I cannot trace the value of the goods declared at the time of importation to the company's payment for the same goods. Or, if I can, I find that the payment amount is different than the amount declared to U.S. Customs and Border Protection (CBP) at the time of importation.

Why does this happen? Mostly, I suspect, because the importer is not adhering to the requirements of the U.S. Customs regulations by requiring the supplier to provide a true commercial invoice to use when declaring the value of the goods at the time of importation. Rather, exporters may provide some kind of delivery document, shipping invoice, or a proforma invoice, all of which are unacceptable to CBP as valid evidence of the value of the merchandise imported.

This problem has been exacerbated in recent years as CBP transitions to an automated environment, and no longer requires importers to submit paper entry documents; therefore, the lack of an acceptable commercial invoice goes unnoticed until a Customs audit, and then the importer either can't link the document used at the time of entry to the payment, or worse, the amount paid is different than the amount declared.

The regulations of U.S. Customs and Border Protection are quite clear. A commercial invoice must accompany all entries of goods, unless an exception exists. Sections 141.81 and 141.83 of the Customs regulations provide:

§ 141.81 Invoice for each shipment.

A commercial invoice shall be presented for each shipment of merchandise at the time the entry summary is filed, subject to

the conditions set forth in these regulations.

§ 141.83 Type of invoice required.

(c) Commercial invoice.

(1) A commercial invoice shall be filed for each shipment of merchandise not exempted by paragraph (d) of this section.

What is a "Commercial Invoice?"

In both business and legal terms, a commercial invoice is defined as the seller's bill of sale for the goods:

COMMERCIAL INVOICE - The **seller's bill of sale** for the goods sold, specifying type of goods, quantity and price of each type and terms of sale.

The U.S. Customs regulations identify additional requirements and information (§§ 141.86 through 141.89) that must be provided on a commercial invoice. And, as a general rule, the original commercial invoice must accompany the shipment. Obviously, many of us can look at our transactions and see that this is not what currently occurs. Rather, we may use delivery notes or proforma invoices to declare the value of the goods at the time of entry, while, at a later time, Accounts Payable receives the commercial or billing invoice from the supplier, from which payment is made. This type of process is fraught with problems unless the importer takes appropriate steps to ensure that the amount declared to CBP is the actual amount paid, and that there is an audit trail that links the entry value declaration with the commercial invoice and the payment record.

Customs Bond Requirements and Liquidated Damages

Most importers are probably not aware of the fact that the submission of a commercial invoice is a condition of importation, and that the failure to provide a commercial invoice is a breach of con-

dition of their import bond, for which liquidated damages can be assessed. See § 113.62. In addition, importers (or their brokers) sign a declaration at the time of entry stating that the prices set forth on the invoice are true and correct, and that if the importer later learns that this is not true, it will notify Customs of the inaccuracy. See 19 U.S.C. § 1485(a) (4).

When Is a Commercial Invoice Not Required?

A commercial invoice represents the seller's "bill of sale" for the goods. As such, the most obvious circumstance when a commercial invoice is not required is when there is "no sale" associated with the merchandise being imported. Section 141.83(d) of the Customs regulations provides that a commercial invoice is not required in connection with the filing of an entry for:

- Merchandise not intended for sale or any commercial use in its imported condition or any other form, and not brought in on commission for any person other than the importer.
- Merchandise returned to the United States after having been exported for repairs or alteration under HTS subheadings 9802.00.40 and 9802.00.60.
- Merchandise for which an appraisement entry is accepted.
- Merchandise entered temporarily into the Customs territory of the United States under bond or for permanent exhibition under bond.

The importer, however, is still required to present some evidence of value, such as an invoice, memorandum invoice, or bill pertaining to the merchandise which is in his possession or available to him. In the case where a foreign shipper provides merchandise to a U.S. importer free of charge, and it is not the manufacturer, § 141.86(b) provides:

(b) Non-purchased merchandise shipped by other than manufacturer. Each invoice of imported merchandise shipped to the United States other than the manufacturer and other than pursuant to a purchase ...

shall set forth the time when, the place where, the person from whom such merchandise was purchased, and the price paid.

If no invoice or bill is available, a proforma invoice, as provided for in § 141.85, must be filed, and must contain sufficient information to determine admissibility, classification, and the amount of duties due. Proforma invoices, however, as noted below, are subject to additional bond conditions, unless a waiver is requested and granted.

Entries Without Proper Commercial Invoices

If a commercial invoice is not available in proper form at the time of the entry, and a **waiver** is not requested or granted in accordance with § 141.92, the entry documentation will be accepted by CBP only under the following conditions:

- (a) The port director is satisfied that the failure to produce the commercial invoice is due to a cause beyond the control of the importer, and
- (b) The importer provides:
 - (1) A written declaration that he is unable to produce such invoice, and
 - (2) Any seller's or shipper's invoices that are available to him or, if none are available, a proforma invoice prepared in accordance with § 141.85;
- (c) The invoices and other documents must contain information adequate for the examination of merchandise, the determination of estimated duties, if any, and statistical purposes; and
- (d) The importer files a bond on Customs Form 301, containing the bond conditions set forth in § 113.62, in an amount equal to one and one-half the invoice value of the merchandise.
- (e) Finally, the required commercial invoice must be produced within 120 days after the date of the filing of the entry summary.

Requesting a Waiver of Invoice Requirements

The port director at the port of entry may waive a required commercial invoice when he is satisfied that either:

- (1) The importer cannot by reason of conditions beyond his control furnish a complete and accurate invoice; or
- (2) The examination of merchandise, final determination of duties, and collection of statistics can be effected properly without the production of the required invoice.

As a condition to the granting of a waiver, the importer must provide the following documents with the entry:

- (1) Any invoice or invoices received from the seller or shipper;
- (2) A statement pointing out in exact detail any inaccuracies, omissions, or other defects in such invoice or invoices;
- (3) A proforma invoice executed in accordance with § 141.85; and
- (4) Any other information required by the port director for either the appraisal or classification of the merchandise.

Liability under the bond on Customs Form 301 for the production of a correct commercial invoice shall be deemed satisfied when a waiver has been granted.

Exercising Reasonable Care:

What Importers Should Do To Ensure Compliance

The first step that all importers should take is to review their import transactions and entry documents on a regular basis to ensure that they are actually using a true commercial invoice for entry declaration purposes, and that the value stated on

the invoice declared to Customs is what the importer paid its foreign supplier. If there is a value difference, then the importer should consider how best to take corrective action, such as filing a post entry amendment, a prior disclosure, or participation in Customs' Entry Reconciliation program.

Entry values can be verified by comparing the invoice accompanying the entry package against the document used by accounting or accounts payable to pay for the merchandise. If the two are not the same, or if you cannot tie the two together, you have a problem.

Second, importers should establish a policy that a commercial invoice must accompany all imports, unless one of the noted exceptions exists.

If an exception does exist, as in the case of imports of no-charge merchandise, returns, or goods subject to foreign assembly, then the importer is advised to review the circumstances of the exception with their local import or entry specialist team at the port of entry and establish a procedure to ensure that proper documentation is available to support the value declared on the entry. If necessary, the importer can request a waiver of the commercial invoice and use an acceptable proforma invoice to declare the value, or participate in Custom's Entry Reconciliation program.

If you wish further information regarding the issues and topics summarized above, contact George R. Tuttle III at (415) 288-0428 or geo@tuttlelaw.com.

George R. Tuttle III is an attorney with the Law Offices of George R. Tuttle in San Francisco. The information in this article is general in nature, and is not intended to constitute legal advice or to create an attorney-client relationship with respect to any event or occurrence, and may not be considered as such. Copyright © 2005 by Tuttle Law Offices.

2006 Membership Directory

It is that time of year again when we start to prepare for the new PAEI Membership Directory. We want to make sure that we have all current PAEI members information listed with correct contact information for your membership. If your membership is more than 30 days past expiration, and you wish to be included, please make sure to send in your membership dues. Information that is included in the PAEI Membership Directory is as follows:

**Members Name, Title, and Company Name
Telephone Number, Fax Number
And E-mail Address.**

It is very important that we have your e-mail address because most PAEI announcements and PAEI newsletters are sent via email only.

If you have not already returned the PAEI membership information form with any corrections, please do so by December 21, 2005. On the form you were mailed, the fax number was incomplete. Please fax the corrections to Karen Hebert at **408-274-7611**.

How to Cast Your Vote!

- If mailing the Ballot, it must be placed in the self-addressed envelope that was mailed to you. The envelope must be postmarked by Wednesday, December 21, 2005, in order to be valid.
- If replying by email, please only send the one page, with your choices marked, to Khebertdms@aol.com Please note that you must include your name and company contact information in the email. Please email by December 21, 2005.
- Each PAEI member in good standing is allowed to cast only one ballot, with up to three choices marked.

**All Ballots must be received or postmarked
by December 21, 2005.**

PAEI Ballot

All PAEI members have been sent by postal mail, and by email a PAEI ballot for the 2006 Board of Directors elections.

If you have not returned your 2006 PAEI Board of Directors Ballot, please cast your vote and return it by December 21, 2005. The complete online ballot is available for viewing at <http://www.paei.org/Elections/PAEIOnlineBallot.pdf>

For the ballot we ask that you carefully read over the biographies of the five candidates running for the 2006-2008 term. Vote for no more than three. In order to be validated ballots must be received or postmarked no later than December 21, 2005. We would also like to thank all five candidates for their expressed interest in running for the three open seats on the Board of Directors.

Ballot 2006 Directors' Election

Vote for no more than three.

- | | |
|--------------------------|-----------------------------|
| <input type="checkbox"/> | Jo-Anne Daniels |
| <input type="checkbox"/> | Anne van de Heetkamp |
| <input type="checkbox"/> | Dan Kromat |
| <input type="checkbox"/> | Gieselle Perez |
| <input type="checkbox"/> | Laura Putnam |
| <input type="checkbox"/> | _____ |

Agreement for Duty Free Tariffs on Multi-Chip Packaged IC's

By Dan Kromat, PAEI Director

The U.S. Trade Representative announced that the United States has negotiated an agreement with Japan, Korea, Taiwan, and the European Union to grant duty-free treatment to "multi-chip packages" aka "MCPs" or "stacked die ICs". This product utilizes a relatively new semiconductor technology to put more memory into integrated circuit packages - a form of miniaturization. These ICs are most frequently used in digital cameras, cell phones, and (PDAs) personal digital assistants, which are primarily assembled in the Far East. This new agreement is expected to take effect on January 1, 2006.

This is a big boost for U.S. companies manufacturing and/or selling these IC's, as the current rate of duty into the U.S. is 2.6% or when exported direct from Far East assembly facilities to the European Union, duties are currently 4% of the CIF sales price. U.S. headquartered companies currently account for over 50% of the world's production of "multi-chip packages," in a market which has been growing by about 25% a year for 5 years. Global trade in "multi-chip packages" was about \$4.2 billion in 2004 and is expected to double by 2008.

Customs Opens the Door to the Financial Benefits of ACE

By Dan Kromat, PAEI Director

The Automated Commercial Environment (ACE) is a multi-billion dollar long-term project to modernize Customs' automated processing systems and gradually replace the Automated Broker Interface and other systems. See ACE Application Information on the Customs web site www.cbp.gov under Imports.

Prior to October 24, 2005, Customs had only been offering Periodic Monthly Statement (PMS) capability and other ACE benefits to Portal Accounts. Being a Portal Account utilizing PMS would allow importers to pay all entry duties and fees for their account for one month in the following month. Portal Accounts needed to be C-TPAT Certified, Automated Clearing House (ACH) participants, and have a bond rider, and have a corporate sign off on an agreement with Customs, which included some Terms & Conditions that many importers found difficult to swallow. Obviously, there were benefits, including access to a large number of reports, viewing all the entries filed under one IRS number throughout the United States, paying all duties for an entire month with one bank payment against a Customs statement, and a cost of funds savings by expanding the duty and fees deadline from ten working days to ten working days after a month's worth of entries, to be paid in the following month. This program created a lot of interest with the largest importers. However, the

vast majority of importers were not knocking on Customs' door.

On October 24, 2005, Customs issued an Administrative Message announcing the creation of a new approach to PMS benefits called Non-Portal Accounts. Now all a broker needs is a valid Power of Attorney, a Continuous Bond, a CF 5106, an IRS number and the importers approval. If your broker is a Portal Account and capable of using PMS they can establish an importer as a Non-Portal Account and make the payments based PMS. No longer will the importer need to be ACH participants or C-TPAT Certified to be on PMS. Also, the importer will not be required to obtain a Bond Rider, or sign the Portal Account application with its somewhat onerous Terms and Conditions.

Importers that are on ACH can still be Non-Portal Accounts, however they will be outside of the brokers ACH payment, therefore the broker(s) would need to provide the PMS details to the importer. The importer would still pay CBP directly, but cannot view the PMS details because they are Non-Portal and would have to get the correct payment information from their Portal broker in order to correctly make ACH payments. CBP would deduct the duties and fees from the importers ACH account under the new payment timeline.

As an additional benefit, regarding PMS, CBP expanded the date of payment for duties and fees to the 15th working day of the following month. Therefore, if your entries were filed as a Non-Portal Account throughout November 2005, your absolute duty & fees payment date would be December 21, 2005. Entry summaries must still be filed with Customs within 10 working days of the date of entry, as only the payment date to CBP has changed.

Any Broker that is a Portal Account with a valid Power of Attorney and knowledge of the importers bond and IRS number could file for an importer to receive Non-Portal Account status and allow the importer and the broker the benefits of PMS, including the improved payment terms mentioned above. Of course, they should ask the importers permission before doing this, or the importer should request the broker to set them up as Non-Portal. Importers that use more than one broker should consider that once Customs receives the request for an importer to be Non-Portal Account, Customs throws a switch in their computer system, and they become Non-Portal Accounts, and any of their brokers can file a Non-Portal Account entries, provided they are a Portal Accounts. Most brokers will be Portal Accounts very soon, if they do not already have that approval from Customs.

These articles were prepared by Dan Kromat, Manager Customs Compliance, a Licensed Broker working for KSI Corporation in South San Francisco, CA. He can be reached at dan.kromat@ksicorp.com or 650-228-7155.

“Complying with Encryption Policies” Brown Bag, October 6, 2005

By Jo-Anne Daniels, PAEI Director

PAEI proudly presented “Complying with Encryption Policies and Standards: Impact of New Regulations” October 6, 2005, at National Semiconductor Corporation. Mr. Dan Fisher-Owens, Associate with Berliner, Corcoran & Rowe was the guest speaker.

Mr. Fisher-Owens spoke about such topics as pre-export product review, Mass Market standards and approvals, License Exception ENC Restricted and Unrestricted, licensing arrangements, and EU “License Free Zone.”

There were many questions from the audience about particular topics.. Some attendees were very interested in knowing more about Encryption Licensing Arrangements (ELA’s), a provision that enables companies to receive encryption licensing to export to strategic partners of U.S. companies which are valid for four years. There was also some discussion regarding Mass Market encryption. Companies must apply to BIS for MM approval and after 30 days can assume its product meets MM; there are no longer reporting requirements and EI (Encryption Controls) no longer apply.

Attendees had many positive comments and said they would welcome more PAEI Encryption seminars.

Advanced Customs Compliance Course Completed Nov. 19, 2005

By Dan Kromat, PAEI Director

The Advanced Customs Compliance Course was one Wednesday evening per week for 5 weeks, starting October 19th and finishing up November 16th.

This was a great presentation and our speakers from the Law Offices of George R. Tuttle did a great job as usual. They brought a great deal of handouts to the class and everyone went away with a Certificate of Completion.

PAEI believes that these classes and the Certificates of Completion offer a real benefit to the international trade community by helping to educate our members and providing training records for corporations. Also, the training evidences that corporations are using reasonable care in educating their personnel in the complexities of the import process. The course provided about 15 hours of education.

Everyone seemed to have a good time, and we finished off with a hot chicken and pasta dinner on the 16th of November.

Because this course is so time consuming, PAEI has only been offering it every couple of years. We have been thinking about changing it to a two-day seminar, and would really appreciate our members advising us on the best schedule for this type of education.

Upcoming BIS/P.A.E.I. Events Mark Your Calendars!

- **January 18 - 19, 2006**
“Complying with U.S. Export Controls”
- **May 23 - 24, 2006**
“Complying with U.S. Export Controls”
- **September 28 - 29, 2006**
“Complying with U.S. Export Controls”

PAEI is always interested in offering the education that our members need. If you want to suggest a topic for a future course, please call one of the PAEI Board Members.

Watch the PAEI Web site for upcoming events, <http://www.paei.org/>.



**The Bureau of Industry and Security
and
The Professional Association of Exporters and Importers
are proud to offer:**

“Complying with U.S. Export Controls”

January 18 - 19, 2006

8:30 A.M. - 4:30 P.M.

at the

Biltmore Hotel and Suites

2151 Laurelwood Road

Santa Clara, CA 95054

408) 988-8411

This two-day Export Regulations Course is led by BIS’s professional counseling staff and covers the information you need to know to comply with U.S. export control requirements on commercial exports. Presenters also conduct a number of in-depth, “hands-on” exercises that help prepare attendees to apply the regulations in their own companies.

The seminar will focus on:

- The scope of the EAR
- Steps to take to determine the export licensing requirements for your item
- When you can export or reexport without applying for a license
- How to determine your export control classification number (ECCN)
- Export clearance procedures and record keeping requirements
- Introduction to the concept of an Export Management System (EMS)
- Real life examples will be presented applying this information.

This program is well suited for those who need a comprehensive understanding of their compliance obligations under the regulations. All seminar-training materials will be furnished.

The Western Regional Office of the Department of Commerce, Bureau of Industry and Security is a State Bar of California approved MCLE provider. This course is worth 12 hours of MCLE credit. However, 0 hours will apply to legal ethics/law practice management; prevention, detection and treatment of substance abuse and emotional distress; and elimination of bias.

Note: Americans with Disabilities Act: If special arrangements are required for a disabled individual to attend this program, please notify the contact person at least one week prior to the program.

January 18 - 19, 2006 “Complying With U.S. Controls”

ACCOMODATIONS

Please make your reservations directly with the Biltmore Hotel and Suites by calling (408) 988-8411. Please mention "PAEI" to obtain a discounted rate of \$109 for the Garden rooms and \$129 for the Tower Suites. Hotel Website: <http://www.hotelbiltmore.com/>

QUESTIONS?

For more information on the details of the program, please call BIS at (949) 660-0144, or (408) 998-7402 or PAEI (408) 532-PAEI (7234) or email khebertdms@paei.org. You may also visit the web sites of PAEI <http://www.paei.org/> or BIS <http://www.bis.doc.gov/> for more information.

REGISTRATION

No telephone or fax reservations please.

Advance registration is required for the Seminar and space is limited. Breakfast, lunch, coffee breaks, and training materials will be provided. No refunds for cancellations made after Friday, January 13, 2006. A confirmation email will be sent to all paid registrants to verify that their registration is complete.

You may register for this seminar and pay by credit card in a secure environment on PAEI's web site at <http://paei.org/>. We accept Visa/AMX/Mastercard only through the PAEI web site, <http://www.acteva.com/booking.cfm?bevaaid=99828>. Online registration must include the name of the attendee and their email address.

To pay by check, please send your check (payable to the Professional Association of Exporters and Importers, PAEI) in the amount of **\$295** to PO Box 612743, San Jose, CA 95161-2743. PAEI's Tax ID Number is 680117035. All mailed registrations must be postmarked no later than Friday, January 13, 2006. Online registrations will be open until Friday, January 13, 2006.

Please complete one registration form for each attendee. Please print clearly.

Attendee Name: _____

Job Title: _____

Company Name: _____

Street Address: _____

City, State, ZIP: _____

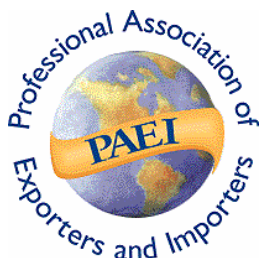
Phone: _____ Fax: _____

E-mail: _____

Check No. _____ Amount _____

PAEI Member: YES NO (circle one) Membership Number: _____

January 18 - 19, 2006 "Complying With U.S. Controls"



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September 2005

New

Christina Kallergis	Vase Ventures Imports
Alexander Karahalios	Vase Ventures Imports
Joseph Turner	United Space Alliance
Dennis Krier	FedEx Trade Networks
Connie Gaston	NEC Electronics America, Inc
Bren Hamilton	NEC Electronics America, Inc
Susan Jackson	FEI Company

Renew

Toni Paytas	Thomsen & Burke, LLP
Joannie Montagne	
Jane Watkins	Varian, Inc
John Nieberding	Varian, Inc
Steve Shay	Novellus Systems
Eddie Lin	Kinnex, Inc

October 2005

New

James A. Koroma	Bartell Drugs Company
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Jeff Morse	Keeco
Keith Rosenstiel	PerkinElmer, Inc

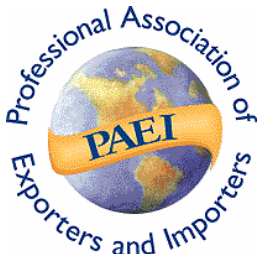
Renew

Karen Birtola	Hitachi America, Ltd.
Jim Harrington	Infineon Technologies
Mike Boucher	Infineon Technologies
Robert Kearsley	PricewaterhouseCoopers LLP
F-N. Brady	Hitachi Data Systems Corp.
Luke Alexander	Hitachi Data Systems Corp.
Mary Budge	Secure Computing Corporation
Elizabeth K. Lally	Secure Computing Corporation
Gendy Allbrook	Apple Computer, Inc
Maxine Curry	Apple Computer, Inc
Donna L. Avila	Aerospace Corporation
Kivi J Walonen	Varian Medical Systems, Inc
Dora Gleaton	California Eastern Labs
Sergio Virelas	California Eastern Labs

November 2005

New

Joseph D. Lawhun	N.F. Stroth and Associates, LLC
Neill F. Stroth	N.F. Stroth and Associates, LLC
Sabrina Q. Chen	Calmar Optcom, Inc
Nancy Cornett	Hitachi America, LTD
Keri Wissell	The SearchLogix



Continued from page 14...

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Renew

November 2005 cont'd...

Giancarlo Vestri	Union Bank of California
Linda D. Mills	Jet Propulsion Lab
Bill White	White Consulting
Jennifer Eldefonso	Advanced Micro Devices -UPS
Steven Kott	Advanced Micro Devices
Ray T. Hirata	Hitachi Global Storage Tech.
Kevin Lieu	Hitachi Global Storage Tech.

Amy Hamilton	Cisco Systems, Inc
Carole Herron	Cisco Systems, Inc
Nicole Malcolm	Applied Materials, Inc
E. Patricia Barney	NVIDIA Corporation
Henry Pizarro	NVIDIA Corporation
Marc Torres	Export Procedures Academy
Mary R Breede	Seagate Technology, LLC
Michelle Scott-Horwitz	Seagate Technology, LLC
Gary Sitts	Palo Alto Research Center
Susan Gleason	Fujitsu America, Inc
Jinny Lo	Fujitsu America, Inc
Surya Dhamija	Air 7 Seas Transport Logistics
John Montalto	TELLLABS

December 2005

New

Gabriel Key	Monterey Inst. For Int'l Studies
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Renew

Cynthia Hall	
Beverly J. Gonzales	TAK Imaging
Loren R. Sorensen	Sorensen Associates
Steven Fisher	Kendall-Jackson Wine Estates
Jo-Anne Daniesl	Trade Resources & Associates

PAEI Members Get Involved!

The P.A.E.I. Newsletter is a publication that is written by its many members. If you have an article you have written that you would like to be included in the next newsletter, please contact Dan Kromat at <mailto:dan.kromat@ksicorp.com>.

The PAEI Board of Directors is always interested in offering the education our members need. If you want to suggest a topic for a future course, please contact one of the PAEI Board members.

The PAEI Board looks forward to hearing from its valued members!



P.A.E.I. Membership Information

The Professional Association of Exporters and Importers is an organization of professionals involved in import/export activities. Objectives of the association include promoting and fostering the role of the import/export professional, providing on-going education relative to regulatory issues, exchanging information and enhancing industry's participation in import/export control issues and policies.

P.A.E. I. sponsors quarterly luncheon meetings with featured guest speakers, a bimonthly newsletter, networking and job placement opportunities.

P.A.E.I. membership represents both large and small companies in the high-technology community. Membership is open to all persons interested in personal and professional growth in the international arena. Two types of memberships are available and are valid for one year from date of payment. For more information call the PAEI Message Center at telephone (800) 930-PAEI.

Complete this application and return it along with your check. **Make checks payable to: Professional Association of Exporters & Importers**, P.O. Box 612743, San Jose, CA 95161-2743. **PAEI's TAX ID NO: 680117035.** You may also pay online for your membership at the PAEI web site <http://www.paei.org/>.

Check Membership Choice:

_____ \$50.00 Individual _____ \$150.00 Corporate*

Name: _____

Title: : _____

Phone: _____ **Fax:** _____

E-mail: _____

Company/Corporate Name: _____

Mailing Address: _____

City, State and Zip: _____

***Corporate members please indicate second name:**

2nd Name: _____

Title: _____

Phone: _____ **Fax:** _____

E-mail: _____

How did you hear about P.A.E.I.? _____