

June 6, 2008

Mr. David Rostker  
Office of Information and Regulatory Affairs  
The Office of Management and Budget  
725 17<sup>th</sup> Street, NW  
Washington, DC 20503

Reference: Department of Commerce rule mandating SNAP-R (RIN 0694-AD94)

Dear Mr. Rostker;

I understand that Commerce has forwarded to your office their recommended rule requiring that all BIS export license applications be submitted through the SNAP-R web browser interface, thereby eliminating any other automated submission. We commented on December 14, 2007 on the original proposal of the rule, and are disappointed to understand that Commerce has forwarded it for OMB approval without modification. I am writing to explain how the impact of the proposed rule directly contradicts OMB's e-Gov initiatives.

OCR Services is an independent software vendor providing compliance information systems to major corporate exporters, including Alliant Tech Systems (ATK), The Boeing Company, FLIR Systems, General Electric, Honeywell, ITT, L-3, Northrop-Grumman, and Thales to name a few. These corporations have multiple divisions with individual SNAP-R Customer Identification Numbers (CIN). Department of Commerce failed to consolidate the multiple customer identification numbers for a single corporation in their analysis of the potential impact of this rule. In fact, compatibility with enterprise information systems has not even been discussed or mentioned in Commerce's analysis.

OCR believes that the rule will impose a heavy burden on the productivity and efficiency of major corporate compliance programs without any benefit. Our compliance information system maintains information on many details that contribute to the export transaction. The proposed rule will require clerical personnel to tediously transcribe this information from the database application into the SNAP-R web browser interface, and in this manual process certainly generate inaccuracies that will escape management review.

Other federal agencies do not require applications to be submitted using a single browser interface similar to SNAP-R. For example, Department of State, ITAR export applications may be submitted through the D-Trade automated interface without transcription or web browser intervention. At DoD, the Wide Area Work Flow – Receipts and Acceptance (WAWF-RA) allows the submission of receiving reports and invoices via FTP or EDI. At

Customs the Shipper's Export Declaration (SED) can be filed directly through an automated interface. Our customers take maximum advantage of these paperless submissions. Ironically, Bureau of Information and Security has recently begun an audit program to detect inconsistencies between the original approved Commerce license and the SED data at Customs. The new SNAP-R rule will frustrate the efforts of major corporations to eliminate these inconsistencies. An automated interface to SNAP-R that allows companies to use their enterprise system to apply for a Commerce license and use the same system to report SED data to Customs would go far to remove inconsistencies between the Commerce license and the SED.

Since the SNAP-R business rules and data definitions are already in place, it is only a modest technical project to enable and maintain an automated interface. We have offered our own cooperation to accomplish this, and we are certain that major exporters would also cooperate. We urge your office to attach this condition to approval of the proposed rule. This step is essential to bring the efficiency of electronic commerce to all parties concerned with exports controlled by BIS.

Sincerely,

/s/ Rakesh Allahabadi  
Vice President of Client Support  
OCR Services, Inc.  
750 Terrado Plaza, Suite 240  
Covina, CA 91741  
626 858 9317 (Work)  
626 252 2589 (Cell)