

Vol. 33, No. 42

October 28, 2013

ITC Fills Key Posts, Welcomes New Commissioner

After a long search, the International Trade Commission (ITC) has named a new general counsel and director of unfair import investigations and sworn in a new commissioner. New Commissioner F. Scott Kieff was sworn in Oct. 18 for term expiring June 16, 2020. He fills the seat of Daniel Pearson, whose term had expired. The Senate confirmed Kieff in August (see **WTTL**, Aug. 5, page 8). First nominated in September 2012, he was a professor at George Washington University Law School and the Ray and Louis Knowles Senior Fellow at Stanford University's Hoover Institution, where he directed Project on Commercializing Innovation and served on its Property Rights Task Force.

Dominic L. Bianchi, who was named general counsel, had served as acting general counsel and chief of staff under then-ITC Chairman Deanna Tanner Okun as well as a congressional relations officer. Before joining the ITC, he was a congressional affairs specialist for U.S. Trade Representatives (USTR) Mickey Kantor and Charlene Barshefsky and acting assistant USTR for intergovernmental and public liaison. Bianchi has a J.D. from Georgetown University Law Center and a B.S. from Northwestern University.

Margaret D. Macdonald will head the Office of Unfair Import Investigations, which handles Section 337 cases involving patent and trademark infringement by imports. Before joining the ITC, she was a partner at the Washington, D.C., law firm of Perkins Coie LLP and previously with Howrey LLP in Washington from 1996 to 2011, where she became a partner in 2005. Macdonald holds a B.A. from Trinity College in Hartford, Conn., an M.A. from the School of International Service at American University, and a J.D. from the Washington College of Law at American University.

Diebold Pays \$48 Million to Settle FCPA Charges

In parallel settlements announced Oct. 22, Diebold Inc., a Canton, Ohio, manufacturer of automated teller machines (ATMs) and bank security systems, agreed to pay a total of \$48 million to the Securities and Exchange Commission (SEC) and Justice to settle charges of violating the Foreign Corrupt Practices Act (FCPA). Diebold was accused of bribing government officials in China and Indonesia and falsifying records in Russia to obtain and retain contracts to provide ATMs to state-owned and private banks in those countries from 2005 to 2010. In total, Diebold spent approximately \$1.6 million on

international leisure trips, entertainment, and improper gifts to bribe government-owned bank officials in China, and more than \$147,000 to bribe officials at government banks in Indonesia, the SEC complaint charged. From 2005 to 2008, its Russian subsidiary allegedly paid approximately \$1.2 million in bribes to help sell ATMs to private banks. “Diebold Russia executed phony service contracts with its distributor to hide and falsely record the payments as legitimate business expenses,” the complaint added.

Diebold hinted at FCPA problems in its quarterly report to the SEC in October 2010. In its filing, Diebold had revealed that it received a subpoena for documents from the SEC and a voluntary request for documents from Justice in connection with an investigation of possible FCPA violations.

“Today’s settlement agreement is an important step for the company moving forward. It’s imperative for Diebold to recognize these issues head on, acknowledge responsibility, put the FCPA investigation period behind it and get on with the business of managing the company,” a Diebold spokesperson wrote in an e-mail to WTTL.

Diebold agreed to pay \$22.9 million in disgorgement and prejudgment interest to the SEC. Under a deferred prosecution agreement (DPA) with Justice, the company also agreed to pay a \$25.2 million fine. In addition, Diebold promised to implement rigorous internal controls, cooperate fully with the department, and retain a compliance monitor for at least 18 months. Under the DPA, Justice will defer prosecution for three years and then dismiss the charges if Diebold abides by the agreement’s terms. The company voluntarily disclosed the matter, Justice said.

Comments Suggest More Tweaks to ITAR Brokering Rules

Along with general praise, defense firms still have suggestions on how State’s Directorate of Defense Trade Controls (DDTC) could improve the interim final revisions it made to the brokering rules in the International Traffic in Arms Regulations (ITAR), which became effective Oct. 25. In addition to comments from the American Bar Association’s international law section, GE Aviation and the Aviation Suppliers Association (ASA) filed comments seeking changes to clarify the rules (see WTTL, Oct. 14, page 3).

GE Aviation complained that limiting the exclusion from registration requirements to “regular employees” is unnecessarily narrow. “GE believes that the Department does not actually wish to require the registration of non-full-time employees and other staff as brokers, or to establish requirements as to how corporations meet their normal staffing needs,” it said. “Excluding these individuals from broker registration and prior approval requirements will not weaken the controls on the corporation, as broker,” the comment continued.

The company also suggested adding more examples of what would constitute excluded activities. “GE recommends including an example that clarifies that activities by compliance professionals that do not exceed the provision of compliance advice to clients be treated in the same manner as activities by attorneys,” it added.

In its comments, ASA lauded the combined exporter/broker registration form among other changes as a “positive and efficient step.” At the same time, it took specific issue

with the lack of clarity about when brokering begins in the exporting process. “We recommend adding clarifying language to establish exactly when a brokering activity actually begins, so that applicants needing pre-approval are not inadvertently trapped in a situation in which pre-approval for a brokering activity was required, but for which they had no knowledge until the brokering activity had begun,” ASA noted.

Specifically, the group suggested adding the word “knowingly” to reporting requirements. “The inclusion of the word ‘knowingly’ will permit a broker that is initially unaware that they may be engaging in a brokering activity to halt the transaction upon discovering a third party is involved in the transaction, and seek the proper approval from the State Department,” it stated.

Unions Hit Failures of U.S.-Guatemala Labor Enforcement Plan

Six months after the signing of an “Enforcement Plan” by the U.S. and Guatemala to improve labor conditions in the Central American country, unions in the U.S. and Guatemala are complaining that the pact is failing to improve labor rights in Guatemala and are calling for the reopening of an arbitral panel under the provisions of the U.S.-Central America Free Trade Agreement (CAFTA). The plan has given Guatemala (COG) “yet another opportunity to delay an Arbitral Panel, and, in some areas, represents a step backwards in labor law enforcement,” said an Oct. 22 letter to USTR Michael Froman and Labor Secretary Thomas Perez from the leaders of the AFL-CIO and several Guatemalan unions (see **WTTL**, April 15, page 7).

“Guatemala has taken steps to improve enforcement of worker rights, but there is substantially more progress to be made,” USTR Michael Froman responded in a statement Oct. 25. “We will continue to work with the Guatemalan Government and with our partners in the labor movement to ensure the implementation of Guatemala’s commitments to strengthen labor law compliance,” he said. His office said Froman had communicated to Guatemalan officials that the U.S. expects solid progress in fully implementing the commitments over the next six months.

Although an AFL-CIO official praised the plan when it was announced, the unions now say Guatemala has not been responsive to their comments and recommendations. The nine-page letter details several areas where the plan has not been implemented and working conditions remain unsatisfactory.

“The most critical failure of the plan is its inability to ensure the COG adheres to its own public commitments as well as international labor standards and give the Ministry of Labor the ability to issue administrative sanctions, as provided in the Labor Code,” the unions wrote. They also cited the lack of transparency in implementing the plan, the failure to consult with unions, threats and retaliation against labor activists, erratic enforcement of court orders, and the failure to make required social security payments.

“To ensure fundamental labor rights, there must be functional, credible institutional mechanisms capable of responding to ongoing violations,” the letter said. “Since too little progress has been made in accomplishing these goals, we call for reinstatement of the Arbitral Panel at the end of the first six-month review period. In addition, we call on both governments to begin a tripartite dialogue and consultation to address

noncompliance with labor chapters of CAFTA and the ongoing issues of violence against trade unions,” it concluded.

Settlement Comes after Iraq Withdrew Boycott Language

Even after Iraq’s Ministry of Health agreed to withdraw Israel boycott language from a contract for medical sterilization equipment, a Nashville, Tenn., supplier of medical equipment got caught by Commerce’s antiboycott regulations for failing to file a written report about the request in a timely manner. AIX Global LLC had voluntarily reported the contract’s provisions orally to the U.S. embassy in Iraq and to the Bureau of Industry and Security (BIS), Tamara Quinn, the company’s CEO, told WTTL.

Because the written report was filed about a month and a half late, AIX reached an agreement with BIS Sept. 27 to settle three charges of violating the antiboycott regulations. BIS fined the company \$15,000 but suspended the penalty for six months and will then waive the fine if AIX commits no further violations. The company neither admitted nor denied BIS’ charges.

According to Quinn, AIX had negotiated several contracts with the ministry for medical equipment, including the sterilization boilers, in early 2008 while the U.S. provisional authority was still in Iraq. None of those contracts included boycott language except one. In drafting that one contract, the Ministry of Health had used an old pre-war contract as its model and that older contract included boycott language.

“Once we found out, everyone was notified,” Quinn told WTTL. In what may have been an unprecedented gesture, the ministry removed the boycott language from the contract after AIX objected to it, Quinn said. After all of this, the ministry cancelled the contract because it decided to repair its existing boilers rather than buy new ones, Quinn said.

On its website, AIX Global says it represents “over 50 highly regarded companies to provide top quality medical supplies, equipment, and service” and specializes in selling to Iraq and other Middle Eastern countries. “By helping establish Iraq’s new economy, we promote a new era of peace and prosperity for the Iraqi people. Our goal is to bring the Iraqi market to top brand manufacturing companies, while providing efficiency, ease and security throughout each business transaction,” it states.

EU, Canada FTA Deal Puts Pressure on TTIP Negotiations

A free trade agreement (FTA) reached between the European Union (EU) and Canada Oct. 18 will put pressure on U.S. and EU negotiators to avoid delays on a Transatlantic Trade and Investment Partnership (TTIP) deal next year to avoid the diversion of trade to Canada. The pact, which still needs approval by the EU Council and parliament and Canadian parliament, also sets a benchmark on what the EU will demand in TTIP and what it should be willing to offer.

Called a Comprehensive Economic and Trade Agreement (CETA), the accord will eliminate almost all industrial tariffs but provide special treatment for some sensitive agriculture sectors. It also will open government procurement in Canada down to the sub-federal level to EU firms, provide for recognition of some geographic indications

(GIs), ease the movement of professional workers between the EU and Canada and strengthen Canadian intellectual property protections, particularly for pharmaceuticals. “This agreement will provide significant new opportunities for companies in the EU and in Canada by increasing market access for goods and services and providing new opportunities for European investors,” said a statement by EU President José Manuel Barroso. “It will be the basis for gaining a strong foothold in the North American market and so provide a catalyst for growth and the creation of jobs in Europe,” he added.

According to the EU, the GI section of the CETA will recognize the special status and offer protection on the Canadian market to a list of European agricultural products from specific geographical origins. Among the items on the list are Grana Padano, Roquefort, Elia Kalamatas Olives or Aceto balsamico di Modena.

“The Agreement also provides for the possibility to add other products’ names to the list in the future. In addition, thanks to the agreement, some prominent EU GIs such as Prosciutto di Parma and Prosciutto di San Daniele will finally be authorised to use their name when sold in Canada, which was not the case for more than 20 years,” an EU memo explained.

While most industrial tariffs and most agriculture will be cut immediately or after a short phase-in period, several farm products will get special treatment under the deal. “By the end of the transitional periods, Canada and the EU will liberalize, respectively, 92.8% and 93.5% of trade lines in agriculture,” the EU said.

For sensitive products such as dairy for Canada and beef, pork and sweet corn for the EU, “it has been agreed that new market access, amounting to a further 1% and 1.9% of tariff lines respectively, will be granted in the form of tariff rate quotas,” it explained. Tariffs on prepared agricultural products (PAPs) will be eliminated.

“Wines and spirits deserve a special consideration within the PAPs group for their particular export relevance,” the EU said, noting that the EU accounts for about half of Canada’s wine imports. “The tariff elimination here is complemented by the removal of other relevant trade barriers which will significantly improve access to the Canadian market for European wines and spirits,” it added.

Device Maker Stryker Pays \$13.3 Million to Settle FCPA Charges

Another healthcare product manufacturer has been hit with penalties for alleged violations of the Foreign Corrupt Practices Act (FCPA). Stryker Corporation, which specializes in hip and joint replacement devices, agreed Oct. 24 to pay \$13.3 million to settle Securities and Exchange Commission (SEC) charges of violating the FCPA from August 2003 to February 2008. A company spokesperson told WTTL that it has been informed that Justice has closed its related investigation into the company’s actions.

The SEC claimed that Stryker subsidiaries in Mexico, Poland, Romania, Argentina and Greece had bribed doctors, healthcare professionals, and other government-employed officials to obtain or retain business. Stryker, based in Kalamazoo, Mich., made approximately \$2.2 million in unlawful payments to these officials and earned approximately \$7.5 million in illicit profits as a result, the SEC charged. “Stryker incorrectly described

these expenses in the company's books and records as legitimate consulting and service contracts, travel expenses, charitable donations, or commissions, when in fact the payments were improperly made by Stryker to obtain or retain business," the SEC complaint noted. "For example, in May 2004, Stryker Poland paid for a foreign official then employed as the director of a public hospital in Poland, and her husband, to travel to New York City and Aruba," the SEC cited.

"Although the official purpose of the trip was for the foreign official to attend a single-day tour of Stryker's manufacturing and research facility in Mahwah, New Jersey, Stryker paid for the couple's six-night stay at a hotel in New York City, attendance at two Broadway shows, and a five-day trip to Aruba before their return flight to Poland," the complaint continued.

"In many instances, even a cursory review of the underlying documentation, such as travel authorization forms and itineraries, would have revealed the illegitimate nature of the payments," the SEC noted. The \$13.3 million settlement includes \$7,502,635 in disgorgement, \$2,280,888 in prejudgment interest and a civil penalty of \$3,500,000.

"In 2007, Stryker received requests from the SEC and DOJ asking Stryker to investigate possible improper payments in connection with the sale of medical devices outside the United States. Following an extensive internal investigation, Stryker provided detailed reports and supporting documents to the SEC and DOJ," wrote Joe Cooper, Stryker's director of global communications, in an email to WTTL.

"Stryker has enhanced its company-wide anti-corruption compliance program that includes enhanced corporate policies and processes, financial controls and governance systems," he added. "Stryker has been advised that the United States Department of Justice (DOJ) has closed its parallel investigation into these matters," Cooper wrote.

The case against Stryker is the latest in a series of SEC and Justice charges against drug and medical device companies for their dealings with officials that work for public health organizations or hospitals in countries with nationalized healthcare systems. In August 2012, drug maker Pfizer paid \$60 million to settle FCPA charges (see **WTTL**, Aug. 13, 2012, page 2). That settlement followed earlier cases involving such firms as Johnson & Johnson, Smith and Nephew, Biomet and Orthofix.

ITA Deal in Bali May Depend on Better Offer from China

Hopes for reaching an agreement to expand the current Information Technology Agreement (ITA) at the World Trade Organization's (WTO) ministerial conference in Bali in December may depend on China making further improvements in its list of "sensitivities" of products that should be excluded from the deal or given long tariff phase-out periods, talks in Geneva the week of Oct. 21 showed. While the negotiations were characterized as "very positive" and constructive by participants, several delegations said China will have to revise its list of sensitivities before a deal can be done, one source reported.

Differences between China and the U.S., European Union (EU) and Japan have narrowed significantly, the source said (see **WTTL**, Oct. 21, page 2). Nonetheless, agreement is still needed on about 30 items, including important items such medical equipment and multi-component semiconductors, that China wants excluded from the deal. So far,

Chinese negotiators don't have a mandate to revise their list and will need to get new instructions from Beijing, the source noted. The issue reportedly was included in discussions at a high-level EU-China trade summit in Brussels Oct. 24.

In its revised list of sensitivities, China dropped demands for excluding many items entirely from the deal but shifted a large number to the list of items for which it wants a long period for phasing out tariffs. There's been general agreement among negotiators that the normal staging or phase-out of tariffs would be three years, with longer staging for sensitive items for five years. More than five years would be restricted to "exceptional circumstances." China reportedly is seeking five-year staging for 60 to 70 products on its remaining sensitivities list of about 100 products.

Several countries told the talks that they don't yet believe the Chinese offer is sufficient to close a deal. Although its demands on phase-out periods have become clearer, China hasn't shown flexibility, and no significant progress was reported on trimming its list, another source reported. Opposition to lengthy phase-out periods is high, he said. The Chinese are still seeking too many items for removal and other items remain contentious, he added. Closing the deal in Bali is dependent on China "walking the extra mile" on staging and exclusions, he said.

While there are 256 products on a draft list of new ITA-covered items, that list may be cut to 200 items, including the priorities of major exporters, one source said. A consensus list has about 105 items, of which 100 really have consensus, he said. Countries are to submit their revised lists of sensitivities by Nov. 4. Negotiators will try to finalize the list during meetings from Nov. 11 to Nov. 20, with the goal of having a draft agreement ready for final finishing touches at the WTO ministerial Dec. 3-6.

Defense Supplier Pleads Guilty to Sending Military Data to India

In what appears to be growing trend, government prosecutors have taken action against the owner and general manager of a Pentagon supplier that falsely claimed to be supplying the department with U.S.-made aircraft parts but actually used parts made in India. To compound that violation, Robert Luba, owner of Allied Components LLC, of a Sparta, N.J., also sent blueprints for those parts and military submarine components to his supplier in India without obtaining a license from State. The aircrafts parts included faulty non-conforming wing-pins for the F-15 fighter.

Luba pleaded guilty Oct. 23 in Trenton, N.J., U.S. District Court to making a false claim to Defense and violating the Arms Export Control Act (AECA). As part of his plea agreement, he will pay approximately \$173,000 to Defense to cover the cost of repairing the grounded F-15s. Luba was released on \$100,000 bond to await sentencing on Feb. 19, 2014.

According to the criminal information filed against him, Luba signed a military critical technical data agreement in July 2011 with Defense, certifying that he acknowledged his responsibilities under applicable U.S. export control laws. He then subcontracted with One Source USA LLC and its owner Hannah Robert to provide the defense hardware items and spare parts. In his plea, Luba admitted he provided foreign-made defense items to DOD under contracts in which he had promised to supply American-made

products, despite knowledge that Robert and One Source USA manufactured their defense hardware items and spare parts at a production facility in India. Robert was indicted Oct. 10 in the Trenton court on separate charges of conspiring to violate and violating the AECA. Her arraignment is scheduled for Oct. 28, and she is on home detention pending trial. In a similar unrelated case, Chih-Kwang Hwa pleaded guilty in July in Seattle U.S. District Court to obtaining Navy contracts for U.S.-made circuit boards and sending restricted data to Taiwan to fulfill the contracts (see **WTTL**, Aug. 5, page 9).

UK Modifies Suspension of Exports to Egyptian Military

After reviewing 47 licenses that had been approved but then suspended for export to Egyptian defense forces, the United Kingdom's (UK) Export Control Office (ECO) has modified its decision and lifted the suspension on 24 of those licenses, the ECO announced Oct. 25. Seven other licenses will be revoked "as there is a clear risk that the goods might be used for internal repression" and the remaining 16 will remain suspended "because the goods might be used for internal repression," it said. The original suspension of licenses had implemented a European Union (EU) decision to suspend export licenses for equipment that might be used for internal repression in Egypt.

"The Foreign & Commonwealth Office (FCO) has now carried out a fuller assessment of conditions prevailing in Egypt and the Business Secretary, on the advice of the Foreign Secretary, has agreed to modify the way the suspension is applied. In future we will not adopt a blanket approach to the Egyptian organisations listed in paragraph (1) but consider each extant licence and new licence application on its merits," the ECO said. The suspension applied to exports to the Egyptian Army, Air Force and Internal Security Forces or Ministry of the Interior (see **WTTL**, Sept. 9, page 3).

*** * * Briefs * * ***

TRADE FIGURES: U.S. merchandise exports in August increased 3.1% from year ago to \$132.4 billion, Commerce reported Oct. 24. Services exports increased 5.9% to \$56.8 billion from year ago. Goods imports went up 0.84% from August 2012 to \$190.7 billion, as services imports gained 0.96% to \$37.4 billion. Numbers were delayed due to government shutdown.

EXPORT ENFORCEMENT: Alma Investment LLC, UAE-based investment and advising company that also appears to be general trading company, agreed Oct. 21 to pay \$1.5 million to settle OFAC charges of violating Iranian Transactions and Sanctions Regulations from September 2009 through February 2010. Alma allegedly originated at least six electronic funds transfers, totaling \$103,283, processed through U.S. financial institutions for persons in Iran. Alma did not voluntarily self-disclose violations to OFAC.

MORE EXPORT ENFORCEMENT: Ameron International Corporation, industrial parts maker in Pasadena, Calif., Oct. 24 agreed to pay \$434,700 to settle OFAC charges of violating Iran and Cuban sanctions from March 2005 through October 2006. It did not voluntarily self-disclose this matter, OFAC said. Ameron allegedly approved capital requests by Dutch and Singaporean subsidiary to purchase toolings and other equipment needed to fulfill orders for South Pars project, located in Iran. The company also referred to its foreign subsidiaries three business opportunities in Iran and provided testing services to subsidiary with reason to know it would benefit Arvand Petrochemical, entity in Iran. In addition, Colombian branch of U.S. subsidiary sold concrete pipe to consortium in which Cuban company was partner. Ameron agreed to be sold in 2011 to National Oilwell Varco Inc., world's biggest provider of oil field equipment.

STILL MORE EXPORT ENFORCEMENT: Brothers Nares and Naris Lekhakul pleaded guilty Oct. 22 in Seattle U.S. District Court for conspiracy to violate Arms Control Export Act (AECA) and attempting to violate AECA by exporting more than 240 shipments of restricted firearms parts, including magazines for .45 caliber handguns, to Thailand without licenses. Co-defendants Witt Sittikornwanish, Wimol Brumme, Sangsit Mowanna and Supanee Saenguthai previously pleaded guilty. All six Thai and U.S. citizens were arrested weekend of June 1 and indictment was unsealed June 3 (see **WTTL**, June 10, page 11).

AND ONE MORE EXPORT ENFORCEMENT: KMT Group AB, Swedish pump manufacturer, agreed to pay OFAC \$125,000 on behalf of U.S. and German subsidiaries, KMT Aqua-Dyne, Inc. (KMT AD) and KMT GmbH, to settle charges of violating Iran sanctions, OFAC reported Oct. 25. In 2009, KMT GmbH allegedly attempted to export nine pumps from U.S. to Iran, and exported, reexported, sold, or supplied pumps from U.S. to Hamburg, Germany, “with knowledge or reason to know that the goods were intended specifically for reexportation to South Pars Industrial Gas Complex in Tehran,” OFAC charged. In September, KMT settled related charges with BIS (see **WTTL**, Sept. 30, page 8).

TETRAFLUOROETHANE: Mexichem Fluor, Inc. filed antidumping and countervailing petitions at ITA and ITC Oct. 22 against imports of 1,1,1,2-Tetrafluoroethane from China.

EU-CHINA: European Union (EU) Council of Ministers gave EU Commission mandate Oct. 18 to launch negotiations on bilateral investment treaties (BIT) with China and ASEAN. “An EU-China investment agreement would be the EU’s first ever stand-alone investment agreement since foreign direct investment became the exclusive competence of the EU under the Lisbon Treaty. It would streamline the existing bilateral investment protection agreements between China and 26 EU Member States into a single, coherent text,” EU explained. “Europe hopes that the negotiations for an investment agreement with China can be launched at the EU-China Summit next month,” it added. BIT talks with ASEAN will be incorporated into ongoing negotiations on EU-ASEAN FTA and FTA negotiations with Malaysia, Vietnam and Thailand.

FLAT PANELS: USTR Oct. 25 welcomed EU adoption of regulation ensuring duty-free treatment for flat panel displays, three years after WTO dispute settlement panel ruled against Europeans (see **WTTL**, Aug. 16, 2010, page 3). In four-year-and-counting WTO dispute, U.S., Japan and Taiwan had argued that EU failed to comply with obligation under Information Technology Agreement (ITA). “Eliminating duties on these and other high-tech products was a key achievement of the WTO’s Information Technology Agreement, and a commitment we are determined to see enforced,” USTR Michael Froman said in a statement.

JAPAN: Only “some progress” was made in U.S.-Japan talks aimed at resolving bilateral disputes as part of Tokyo’s entry into negotiations on a Trans-Pacific Partnership agreement, Acting Deputy USTR Wendy Cutler reported after talks ended Oct. 23. Most recent round of talks focused on motor vehicles, insurance and non-tariff measures. “This third round of our parallel negotiations with Japan yielded some progress, although important work remains – particularly in the area of motor vehicles. We will follow up on a range of issues prior to our next round, the timing of which is still being coordinated, in order to advance bilateral work in line with the time frame for the TPP negotiations established in the TPP Leaders’ statement of October 8, 2013. We have continued to stress the critical importance of achieving strong outcomes from these negotiations,” Cutler said in statement (see **WTTL**, Aug. 19, page 3).

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