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## Miller Named Acting DDTC Chief

Career civil servant Mike Miller Dec. 23 was named acting deputy assistant secretary of State's Directorate of Defense Trade Controls (DDTC), temporarily replacing Brian Nilsson, who retired the day before (see **WTTL**, Dec. 18, page 1). Miller was director for regional security and arms transfers (RSAT) in the Political-Military Affairs Bureau.

Along with Miller, the current DDTC leadership team is made up of all acting office directors: acting policy chief Sarah Heidema, acting chief of staff Tony Dearth and acting licensing director Terri Davis. Former acting compliance chief Art Shulman left to go to Boeing in December. "Leadership responsibilities are being shared by the team chiefs during the transition period until a new Director is identified," DDTC noted in announcing Miller's appointment.

Miller joined State in 1998. Since 2009, he has been serving in RSAT and as its director since December 2015. His previous State positions include program manager for the anti-terrorism assistance program, special assistant to the coordinator for counterterrorism, counterterrorism policy advisor for the Middle East, desk officer for Oman and Yemen, and foreign affairs officer for Middle East political-military issues.

In an op-ed in the New York Times Dec. 27, Secretary Rex Tillerson defended his department's redesign efforts and the more than 30% vacancy rates. "Our redesign doesn't involve simply shifting boxes on an organizational chart. Our changes must address root problems that lead to inefficiencies and frustrations."

## Singapore Firm Pays \$422 Million to Settle Global Bribery Charges

Keppel Offshore & Marine Ltd. (KOM), a Singapore-based company that operates shipyards and repairs and upgrades shipping vessels, and its wholly owned U.S. subsidiary, Keppel Offshore & Marine USA Inc. (KOM USA), agreed Dec. 22 to pay more

than \$422 million in total penalties to U.S., Brazilian and Singaporean authorities for a decade-long scheme to pay millions of dollars in bribes to Brazilian officials. KOM entered into a deferred prosecution agreement (DPA) with Justice in connection with a criminal information filed in Brooklyn U.S. District Court. KOM USA pleaded guilty in the same court to conspiracy to violate the Foreign Corrupt Practices Act (FCPA).

At the same time, Justice unsealed charges against Jeffery Chow, a former senior member of KOM's legal department, who pleaded guilty to conspiracy to violate the FCPA in August 2017 in Brooklyn federal court. He is awaiting sentencing, which is currently scheduled for May 2, 2018.

"In or about 2008, Petrobras invited KOM JV USA to bid on the P-61 project, a tension leg platform project, along with at least two other companies. After the invitation to bid, Consultant met with Brazilian Official 1, who told him that if KOM wanted to win the contract, it would need to pay a percentage of the contract value in bribes to Brazilian Official 1 and the Workers' Party," the KOM USA information noted.

"In total, KOM USA, together with KOM and others, paid approximately \$8.8 million in bribes to Brazilian Official I and the Workers' Party in connection with the P-61 project. KOM and its related entities, including KOM USA, earned profits totaling approximately \$159.9 million from the P-61 project," the information noted.

Under the DPA, KOM agreed to pay the U.S. a criminal penalty of \$105,554,245, including a \$4,725,000 criminal fine paid by KOM USA. In addition, as part of the DPA, KOM also committed to implement rigorous internal controls and to cooperate fully with Justice's ongoing investigation. In related proceedings, the company settled with Brazil's Ministério Público Federal (MPF) and Singapore's Attorney General's Chambers (AGC). Under those respective agreements, Brazil will receive \$211,108,490, or 50% of the total criminal penalty, and Singapore up to \$105,554,245, or 25% of the total, Justice noted.

"The authorities recognize Keppel's cooperation in the investigations and its extensive remedial measures, which involved significant enhancements to compliance and internal controls systems across the Keppel Group, and disciplinary action against individuals involved in the misconduct," KOM said in a statement.

"Integrity is one of Keppel's core values. We do not and will not tolerate any illegal activity in the conduct of our business. We regret and are deeply disappointed by the actions that we now know to have taken place at the Group's offshore and marine business in Brazil from around 2001 to 2014," Keppel Chairman Dr Lee Boon Yang said.

SBM Offshore, a Dutch oil and gas services company, and its wholly owned U.S. subsidiary, SBM Offshore USA Inc. (SBM USA), agreed in November to pay a \$238 million criminal penalty to settle unrelated FCPA charges in connection with schemes involving the bribery of Petrobras officials in Brazil, as well as foreign officials in other countries (see **WTTL**, Dec. 4, page 1).

## Two Republicans Block Ex-Im Bank Nominee

Bowing to industry criticism, the Senate Banking Committee Dec. 19 rejected the administration's nominee to lead the Export-Import Bank (Ex-Im) in a close 10-13 vote. Republican Sens. Tim Scott (S.C.) and Mike Rounds (S.D.) joined Democrats in voting against former Rep. Scott Garrett (R-N.J.). All other Bank nominees passed through the committee.

Rounds had made it clear he would vote against the former lawmaker, but it was unclear how Scott, whose district has benefitted from the bank, would vote (**WTTL**, Dec. 18, page 7). Ultimately, Scott decided that Garrett's history was too much to overcome.

"The South Carolina business community applauds Senator Scott's leadership and thanks him for his vote opposing Scott Garrett's nomination," said Ted Pitts, president & CEO of the South Carolina Chamber of Commerce, in a statement. "The 17,000 South Carolina workers whose jobs depend on the Bank are thankful that Senator Scott cast a vote for them today. The Ex-Im Bank is a valuable tool that should be used to grow American jobs," he added.

All other Ex-Im board nominees -- Kimberly Reed, former Rep. Spencer Bachus (R-Ala.), Judith DelZoppo Pryor and Claudia Slacik -- passed through the committee with little controversy. Mark Greenblatt, the inspector general nominee, passed through unanimously. Republican Sens. Pat Toomey (Pa.), Richard Shelby (Ala.) and Ben Sasse (Neb.) voted against all other nominees, except Greenblatt, presumably in protest of the Garrett vote outcome. Sen. Elizabeth Warren (D-Mass.) joined the three Republicans in voting against Bachus. The nominations have been placed on the Senate Executive Calendar.

Industry groups had voiced their opposition since the day Garrett was nominated. "The Senate Banking Committee did right by America's manufacturing workers today by rejecting Scott Garrett's nomination. This agency, which has supported 1.4 million jobs over the past several years, is too important for manufacturers and our economy to be led by someone who has consistently tried to destroy it," National Association of Manufacturers (NAM) President and CEO Jay Timmons said in a statement after the vote.

## ITC, Commerce Move Forward in Aircraft Dispute

As expected, Commerce Dec. 20 announced affirmative final determinations in its antidumping (AD) and countervailing duty (CVD) investigations of 100- to 150-seat large civil aircraft from Canada. Pending the outcome of the International Trade Commission (ITC) final determinations, Bombardier, faces a final dumping margin of 79.82% and a final subsidy rate of 212.39%.

"We are deeply disappointed that the Commerce Department did not take this opportunity to rectify its past errors. We remain confident that at the end of the process, the [ITC] will reach the right conclusion, which is that the C Series benefits the U.S. aerospace industry,

U.S. airlines, and the U.S. flying public,” Bombardier said in a statement. At a Dec. 18 ITC hearing, the commission heard from the governments of Canada and the United Kingdom, Delta Air Lines and, of course, Bombardier, who oppose the AD and CVD orders. Only Boeing, the petitioner in the case, testified in favor. The ITC is expected to make its final determination Feb. 1.

“These investigations have already established beyond question that Bombardier has taken billions of dollars in illegal government subsidies to prop up its C Series program. The C Series would not even exist at this point but for those subsidies,” Boeing said in a statement following the hearing.

“The investigations have also left no doubt Bombardier used these government funds to dump aircraft into the U.S. market at absurdly low prices, millions below their cost of production and millions below the price of the same aircraft in Canada. Bombardier’s conduct is flatly inconsistent with U.S. trade law, and it has caused severe harm to Boeing, its employees, and its suppliers,” it added.

In contrast, Sylvain Levesque, Bombardier vice president of corporate strategy, testified that his company’s C Series partnership with Airbus stands to benefit the U.S. “We estimate that an investment of approximately \$300 million will be required to establish the U.S. FAL [field assembly line]. The impact on U.S. jobs will also be substantial,” he said in his prepared testimony.

“The C Series facility in Quebec is already expected to support more than 22,700 U.S. jobs, based on \$30 billion in business with U.S. suppliers, when it reaches full capacity. The new facility in Alabama will only increase the program’s employment effects in the United States,” Levesque added. He estimated the FAL would add more than 2,000 permanent jobs to the U.S.

Canadian Ambassador to the U.S. David MacNaughton testified that Boeing has no standing. The case “pushes beyond the boundaries of the Commission’s threat of material injury analysis. Positive evidence on the record does not show any actual or planned exports by Bombardier to any U.S. airline. Therefore, Boeing’s assertion that future imports from Canada threaten to cause material injury is necessarily based on just the type of ‘speculation and conjecture’ that is prohibited under both U.S. and international law,” MacNaughton testified.

Not surprisingly, the Canadian government is backing Bombardier in a big way. Last month, Canada announced an open bidding process for 88 advanced fighter aircraft and noted in the accompanying fact sheet: “When bids are assessed, any bidder responsible for harm to Canada’s economic interests will be at a distinct disadvantage” (see **WTTL**, Dec. 18, page 7).

## **Administration Adjusts Countries’ GSP, AGOA Eligibility**

Just before Christmas, the administration Dec. 22 suspended some of Ukraine’s benefits under the Generalized System of Preferences (GSP), restored Argentina’s GSP eligibility,

and restored eligibility for Gambia and Swaziland under the African Growth and Opportunity Act (AGOA). Despite these actions, the last GSP reauthorization, the Trade Preferences Extension Act of 2015 (H.R. 1295), expired Dec. 31, and seemingly won't be renewed before the new year. Lapses have occurred in the past, and Congress typically offers a retroactive renewal that gives refunds to impacted importers.

“Beneficiary countries choose to either work with USTR [U.S. Trade Representative] to meet trade preference eligibility criteria or face enforcement actions. The administration is committed to ensuring that other countries keep their end of the bargain in our trade relationships,” USTR Robert Lighthizer said in a statement.

In its proclamation, the White House accused Ukraine of failing to provide “adequate and effective protection” of intellectual property rights. The suspension won't kick in for 120 days, because the U.S. believes that the Ukrainian government has a “viable path to remedy the situation, including improving the current legal regime governing royalty reimbursement to right holders’ organizations,” USTR noted in its press release announcing the decision.

Argentina's restoration took effect Jan. 1, 2018. The country's eligibility was suspended in March 2012 because “it had not acted in good faith in enforcing arbitral awards” in favor of U.S. citizens or a corporation, partnership, or association that is 50% or more beneficially owned by U.S. citizens, according to the proclamation (see **WTTL**, April 2, 2012, page 4). Argentina has resolved those disputes, but has not gone far enough on certain IPR issues, so the restoration won't extend to all eligible products.

Gambia lost its AGOA eligibility in 2015 because of “human rights abuses and the deterioration of the rule of law,” according to USTR. The country held democratic elections in December 2016 and has made improvements regarding human rights, thus warranting its restoration to AGOA. Similarly, Swaziland lost its eligibility in 2015 due to restrictions on “freedoms of peaceful assembly, association, and expression” (see **WTTL**, June 30, 2014, page 9). Swaziland met the last U.S. benchmark requirement in November 2017.

USTR is conducting a separate AGOA out-of-cycle review for Rwanda, Tanzania and Uganda. The three countries plan to phase out imports of used clothing to strengthen their domestic apparel industries. Secondary Materials and Recycled Textiles Association petitioned for a review in March and a public hearing was held in July (see **WTTL**, June 26, page 9).

## **Administration Tackles Human Rights Abuses, Corruption**

In the first action under the Global Magnitsky Human Rights Accountability Act (S. 284), President Trump Dec. 21, via executive order, declared a national emergency respecting serious human rights abuse and corruption. Trump imposed sanctions on 13 human rights abusers and corrupt actors. Treasury's Office of Foreign Assets Control (OFAC), in

consultation with State and the Attorney General, imposed sanctions on 39 additional individuals and entities under the executive order's authority. Among the high-profile designees are Maj. Gen. Maung Maung Soe and Yahya Jammeh. In his capacity as the former chief of the Burmese Army's Western command, Soe oversaw widespread human rights abuses against Rohingya Muslim civilians consistent with ethnic cleansing.

Jammeh, former Gambian president from 1994-2017, created "a terror and assassination squad called the Junglers that answered directly to him," according to a Treasury readout. Jammeh routinely had opponents and those he suspected of undermining him murdered or abused during his presidency. OFAC also designated individuals and entities in South Sudan, Belgium, Israel, Guatemala and Uzbekistan, among other countries.

"In Sergei's name, and in the spirit of the many unsung and unnamed individuals around the world who have suffered human rights abuse for uncovering corruption and fighting for freedom, the United States continues to support their efforts and seek accountability and justice with the Global Magnitsky sanctions out today," Sens. Ben Cardin (D-Md.) and John McCain (R-Ariz.), who co-authored the Global Magnitsky Act, said in a joint statement. The Act was signed in December 2016.

"While we would like to see a more geographically diverse and rigorous list going forward, including more of the individuals we highlighted to the Administration, overall we welcome this first edition of the Global Magnitsky list," they said.

Separately, OFAC Dec. 20, effective Dec. 21, designated five more Russian individuals under the Sergei Magnitsky Rule of Law Accountability Act of 2012 (see **WTTL**, Jan. 16, 2017, page 13). Alexei Sheshenya, Yulia Mayorova and Andrei Pavlov were designated for their involvement in the criminal conspiracy Magnitsky uncovered.

OFAC designated Ramzan Kadyrov and Ayub Kataev for violations of internationally recognized human rights. Kadyrov is the head of the Chechen Republic and is alleged to have directed extrajudicial killings, including that of a political opponent. Kataev is alleged to have been involved with violence against gay men in Chechnya in early 2017. To date, 49 individuals have been designated under the Magnitsky Act.

State simultaneously issued its annual submission to Congress on the government's implementation of the law. In a background briefing, department officials addressed Russia's potential response to the report. "At this point we've been at it long enough on Magnitsky that the Russians understand the nature of our concerns. I think they understand the rationale for the legislation, why it was put forward. This is a transparent process; it came through a transparent legislative process, and a process by which we make the designations comply with what's in the law," one senior State official said.

### **Confirmations, MTB Bill Wait for Congress**

As Congress returns from its winter recess, a long list of trade nominees, a Miscellaneous Tariff Bill (MTB) and GSP renewal wait for lawmakers on Capitol Hill. Randolph Stayin

and Dennis Devaney were nominated to the International Trade Commission (ITC) in October and await a Senate Finance Committee hearing. Jason Kearns, another ITC nominee, passed out of committee Oct. 24 and awaits a full Senate vote.

The Senate received Jeffrey Kessler's nomination to be Commerce assistant secretary Nov. 2. He awaits a Senate Finance confirmation hearing. Senate Finance unanimously approved Gilbert Kaplan to be Commerce under secretary for international trade Sept. 7 (see **WTTL**, Sept. 11, page 6). Kaplan was placed on the Senate Executive Calendar and awaits a vote.

Commerce assistant secretary for industry and analysis nominee Nazakhtar Nikakhtar was placed on the calendar after Senate Commerce Committee held a hearing and approved her nomination by voice vote Nov. 8. Sen. Chuck Schumer (D-N.Y.) said in October that he would hold the two Commerce nominees -- Kaplan and Nikakhtar -- over the administration's "failure to resolve" its ongoing steel and aluminum Section 232 investigations (see **WTTL**, Nov. 6, page 8).

Deputy USTR nominees C.J. Mahoney and Dennis Shea were sent to the Senate in July. Both await a Finance hearing. Gregory Doud, nominee to be chief USTR agricultural negotiator, was placed on the Senate Executive Calendar Oct. 24 (see **WTTL**, Oct. 30, page 3). At the same hearing as Doud, deputy USTR nominee Jeffrey Gerrish passed through committee 15-11 and awaits a Senate vote. Deputy Treasury under secretary nominee Adam Lerrick has waited even longer, as his nomination was received by the Senate April 24. He also awaits a Finance hearing.

Hundreds of organizations and companies urged Congress to pass MTB before the end of the year, but like GSP renewal it wasn't to be (see related story, page 4). House Ways and Means and Senate Finance committee leadership introduced the MTB Act of 2017 (H.R. 4318) back in November (see **WTTL**, Dec. 11, page 8).

## **Tillerson, Freeland Highlight NAFTA Benefits**

At their meeting in Ottawa Dec. 19, Secretary of State Rex Tillerson and Canadian Foreign Minister Chrystia Freeland addressed areas of bilateral concern, most notably the ongoing NAFTA negotiations. While Tillerson is not directly involved in the negotiations, he acknowledged his supporting role.

He stressed that NAFTA negotiations are the purview of USTR Robert Lighthizer (see **WTTL**, Dec. 18, page 4). "The next several weeks are going to be very important to those discussions, and my role in the State Department is to be supportive of a positive outcome and ensure that parties are considering all aspects in the broader context of the specific trade issues that the two are negotiating," Tillerson predicted.

"Canada is also an extremely important foreign market for U.S. goods as well. Millions of jobs in both of our countries depend upon our partnership. We too are committed to

continue making progress toward a modernized NAFTA agreement, one that protects jobs and stimulates economic prosperity for both of our countries and is fair to both sides as well,” he said.

“Our countries enjoy the most extensive economic relationship you’ll find anywhere in the world, and there are a number of opportunities to grow that relationship – important opportunities – and build on the strengths of both countries in the years ahead. I think it’s well known that almost 400,000 people move back and forth across this shared border, and almost \$2 billion of goods and services cross our shared border every day – a real testament to the strong economic ties that exist between our people,” he added.

“On NAFTA, Canada’s priority continues to be maintaining the achievements that have bought 23 years of predictability, openness, and collaboration to North America and that supports so many jobs on both sides of the border. We will continue to bring fact-based arguments to the negotiating table as we work to develop a modernized agreement that addresses today’s realities while preserving our shared economic prosperity. We believe a win-win deal is both possible and necessary,” said Freeland.

\* \* \* **Briefs** \* \* \*

NOMINATIONS: Senate Dec. 21 confirmed Christopher Ashley Ford to be assistant secretary of State (international security and non-proliferation). Ford currently serves as special assistant to president and senior director for weapons of mass destruction and counterproliferation at National Security Council.

EXPORT ENFORCEMENT: Three Miami area residents, all employees of export company AW-Tronics, were sentenced Dec. 19 in Miami U.S. District Court for their roles in scheme to illegally export aviation parts and equipment, including micro switches, to Syria between September 2013 and March 2014. Ali Caby was sentenced to 24 months in prison, followed by two years’ supervised release. Co-defendant Arash Caby was sentenced to 24 months, followed by two years’ supervised release and \$10,000 fine. Co-defendant Marjan Caby was sentenced to 12 months and one day, followed by two years’ supervised release. All pleaded guilty in October to conspiracy to violate International Emergency Economic Powers Act (IEEPA) by exporting parts and equipment to Syrian Arab Airlines, Syrian government airline, which is blocked entity (see **WTTL**, Oct. 9, page 7). Eight others were also charged in indictment, including Syrian Arab Airlines aka Syrian Air.

MORE EXPORT ENFORCEMENT: Iranian national Saeid Yahya Charkhian and Caspian Industrial Machinery Supply LLC of Dubai, UAE, agreed Dec. 21 to 12-year export denial order to settle four BIS charges of acting with knowledge and false or misleading statement. Specifically, respondents “sold, transferred and/or forwarded to, and/or ordered or bought for, end users in Iran” items procured from U.S. through intermediary company in Netherlands. Items included masking wax, lithium batteries, and zirconia crucibles that were designated EAR99 and worth nearly \$190,000.

EVEN MORE EXPORT ENFORCEMENT: Giovanni Zannoni, Italian national and member of Italian armed services, pleaded guilty Dec. 21 in Brooklyn U.S. District Court to illegally exporting night vision goggles and assault rifle components to Italy between June 2013 and May 2017 without State licenses. He was arrested in May 2017 at Miami International Airport and remains

in custody. Rifle components included M4 gas blocks, two M4 barrels, one M4 muzzle brake, one M4 end plate, five AR-15 upper receivers, two AR-15 handguards, two AR-15 stock kits and two AR-15 bolt completion kits.

WIRE ROD: In 4-0 final vote Dec. 19, ITC found U.S. industry is materially injured by dumped imports of carbon and certain alloy steel wire rod from Belarus, Russia and UAE. Commission also made negative finding concerning critical circumstances on imports from Russia.

ENTITY LIST: BIS in Dec. 20 Federal Register added two Russian entities to Entity List. Joint Stock Company Experimental Design Bureau Novator and Joint Stock Company Federal Scientific and Production Center Titan-Barrikady “produced, for the Russian Federation Ministry of Defense, a ground-launched cruise missile system, and associated transporter-erector-launcher, with a range prohibited by the Intermediate-Range Nuclear Forces [INF] Treaty,” BIS noted. Administration announced it was pursuing sanctions against Moscow two weeks earlier (see **WTTL**, Dec. 11, page 9).

FCPA: Former Embraer sales executive Colin Steven, UK citizen residing in UAE, pleaded guilty Dec. 21 in Manhattan U.S. District Court to violating Foreign Corrupt Practices Act (FCPA), conspiracy to violate FCPA, wire fraud, conspiracy to commit wire fraud, money laundering, conspiracy to launder money and making false statement for his role in scheme to bribe high-level Saudi government official in exchange for assistance in securing Embraer’s aircraft sale to Saudi Arabia’s national oil company. Embraer S.A. in October 2016 agreed to pay more than \$205 million to settle charges of violating FCPA between May 2008 and February 2011 (see **WTTL**, Oct. 31, 2016, page 1).

RIBBON: Berwick Offray, LLC filed countervailing and antidumping duty petitions Dec. 27 with ITA and ITC against imports of certain plastic decorative ribbon from China. Petitions estimate dumping margins as high as 370%.

CLEANUP ON AISLE SIX: BIS in Federal Register Dec. 27 fixed several EAR provisions to “provide accurate references and fix typographical errors,” including revising six Export Control Classification Numbers (ECCNs) to “enhance consistency” with other ECCNs. “Corrections are editorial in nature and do not affect license requirements,” BIS said. ECCNs include: 0A606, 8A609, 9A610, 0D606, 0E606 and 2B352. Rule also clarified Export Control Decision Tree, removed outdated references in definitions of “deemed export” and “deemed reexport,” and replaced word “digit” with “alphanumeric character.”

KORUS: U.S. and Korean trade officials agreed Dec. 27 to meet in Washington Jan. 5 to discuss renegotiating U.S.-Korea Free Trade Agreement (KORUS). Commerce Secretary Wilbur Ross told audience last month he hopes talks will go “quickly and smoothly” (see **WTTL**, Dec. 18, page 5).

NORTH KOREA: OFAC Dec. 26 designated two North Korean individuals under Executive Order 13687. Kim Jong Sik, deputy director of Workers’ Party of Korea Military Industry Department, and Ri Pyong Chol, first vice department director of Workers’ Party of Korea Central Committee, were added to SDN List. “Treasury is targeting leaders of North Korea’s ballistic missile programs, as part of our maximum pressure campaign to isolate the DPRK and achieve a fully denuclearized Korean Peninsula,” Treasury Secretary Steven Mnuchin said in statement. Action followed UN Security Council Resolution 2397 on Dec. 22 imposing new sanctions on North Korea.

AMIDES: Court of Appeals for Federal Circuit (CAFC) Dec. 21 affirmed CIT ruling that acrylamido tertiary butyl sulfonic acid (ATBS) “is not an amide, but is a derivative of an amide,”

CAFC Judge William Bryson wrote for three-judge panel in *Chemtall, Inc. v. U.S.* Case hinged on distinction between “Amides” and “Other” as used in U.S. Harmonized Tariff Schedule (HTSUS) and associated duty rates. “The secondary sources are nearly all contrary to Chemtall’s position, the limited evidence that supports Chemtall’s interpretation is unpersuasive, and the explanatory notes to Chapter 2924 of the HTSUS do not support Chemtall’s definition of amide,” Bryson wrote.

**WORKERS’ RIGHTS:** Labor Department Dec. 22 announced nearly \$60 million in grants to NGOs and other organizations to “promote labor law enforcement and help end exploitative labor practices” in 25 trading partners. Grants “will support projects to combat some of the most abusive labor practices, including the use of child labor, forced labor, and human trafficking in global supply chains,” department said. New technical assistance will also support trade partners’ compliance with labor requirements of U.S. trade agreements and preference programs, it added. Recipients include International Labor Organization (ILO) in Dominican Republic and Honduras, Plan International in Indonesia and Philippines and Catholic Relief Services.

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