

Vol. 38, No. 35

September 3, 2018

## BIS Updates Controls on Missile Technology

In the Federal Register Aug. 30, Bureau of Industry and Security (BIS) implemented changes agreed at two 2017 meetings of the Missile Technology Control Regime (MTCR). Changes include revising 17 Export Control Classification Numbers (ECCNs), including new definitions and clarifying text. In all, Commerce estimates the rule will not change the number of annual BIS license requests, either because the change is not substantive or because the controlled item is not widely used or exported.

One change involves revising ECCN 9A515 by adding new language to control spacecraft thrusters for missile technology (MT) reasons. This final rule also revises the text to specify that the MT control applies to spacecraft thrusters controlled in that new paragraph when the total impulse capacity is equal to or greater than  $8.41 \times 10^5$ . "These changes are needed to clarify which of the satellite thrusters are subject to the EAR," BIS said. Unlike other changes, these revisions are expected to result in an annual increase of 12 BIS license applications.

That clarification came from a previous final rule that moved these thrusters from the U.S. Munitions List (USML) (see **WTTL**, Jan. 16, 2017, page 8). "State has informed Commerce that it intends to clarify that the existing USML IV(d) paragraph does not control spacecraft thrusters, and that such thrusters are 'subject to the EAR.'"

In ECCN 9A610, BIS removed the term "drones" because the MTCR Annex does not use the term, other than stating that drones are a type of Unmanned Aerial Vehicles (UAVs), the agency noted. Changes to ECCN 9A101 would limit the control to "engines that are most likely to be used on MTCR controlled cruise missiles and unmanned aerial vehicles, and to remove controls from larger engines that are unlikely to be used on such systems."

## U.S. Moves Forward on Bilateral NAFTA

After a week of intense talks with Canada, the U.S. Aug. 31 went forward with a bilateral trade agreement to replace NAFTA, notifying Congress of its intent to sign a trade

© Copyright 2018 Gilston-Kalin Communications LLC.  
P.O. Box 5325, Rockville, MD 20848-5325.  
All rights reserved. Reproduction, photocopying or  
redistribution in any form, including electronic, without  
written approval of publisher is prohibited by law.

WTTL is published weekly 50 times a year except last week  
in August and December. Subscriptions are \$697 a year.  
Additional users pay only \$100 each with full-priced sub-  
scription. Site and corporate licenses are also available.  
Phone: 301-460-3060 Fax: 301-460-3086

agreement with Mexico “– and Canada, if it is willing –“ in 90 days, in time for outgoing Mexican President Pena Nieto to sign it. Whether Congress will agree to a bilateral replacement of a trilateral deal remains to be seen.

Talks between USTR Robert Lighthizer and Canadian Foreign Minister Chrystia Freeland ended abruptly Aug. 31, but are scheduled to continue Sept. 5. “We have also been negotiating with Canada throughout this year-long process. This week those meetings continued at all levels. The talks were constructive, and we made progress. Our officials are continuing to work toward agreement,” the U.S. Trade Representative’s (USTR) office said in a statement.

Four days earlier, the administration announced with much hoopla a deal with Mexico to update NAFTA and a deadline to bring Canada along (see **WTTL**, Aug. 20, page 3). USTR quickly issued three fact sheets, using such action headlines as rebalancing, strengthening and modernizing the 25-year old trade deal.

One USTR fact sheet outlined the agreement on new rules of origin and origin procedures, including product-specific rules for passenger vehicles, light trucks, and auto parts. “This deal encourages United States manufacturing and regional economic growth by requiring that 75 percent of auto content be made in the United States and Mexico,” USTR said.

According to another, the new deal brought the labor chapter into the core of the agreement, making labor provisions “fully enforceable, and represents the strongest provisions of any trade agreement.” This language sounds very familiar to those who followed the Trans-Pacific Partnership (TPP) negotiations leading to the deal’s signing at the end of the Obama administration.

In addition, the environment chapter includes the “most comprehensive set of enforceable environmental obligations of any previous United States agreement, including obligations to combat trafficking in wildlife, timber, and fish; to strengthen law enforcement networks to stem such trafficking; and to address pressing environmental issues such as air quality and marine litter,” USTR said.

Another upgrade could be found in the new digital trade chapter – including a provision that would “ensure that data can be transferred cross-border, and that limits on where data can be stored and processed are minimized, thereby enhancing and protecting the global digital ecosystem,” a fact sheet noted.

However, the missing piece is Canada. Even at the conference call announcing the original deal on Monday, President Pena Nieto insisted Canada be a part of an eventual deal. “We’ll be waiting for Canada to be integrated into this process,” he said. “It is our wish... that now Canada will also be able to be incorporated in all this. And I assume that they going to carry out negotiations of the sensitive bilateral issues between Mexico — rather, between Canada and the United States,” Pena Nieto added.

## Industry, Experts Respond Quickly to NAFTA Announcement

As expected, lawmakers on both sides of the aisle and in both houses weighed in after the deal's announcement. "I look forward to carefully analyzing the details of what has been agreed to and consulting with my colleagues and constituents to determine whether the new proposal meets the high-standard trade priorities set out by Congress under Trade Promotion Authority," House Ways and Means Committee Chair Kevin Brady (R-Texas) said in a statement Aug. 31.

"I also strongly urge Canada to step up and demonstrate that it can take on the ambitious obligations of the agreement with the aim of concluding a modern, seamless three-way agreement," he added.

Sen. Ron Wyden (D-Ore.) said earlier in the week: "NAFTA is an outdated agreement that needs a major overhaul, but there are a lot of details missing from today's announcement, and there are big unanswered questions as to where negotiations will go with Canada. Furthermore, the administration must follow the laws that I fought to pass to keep Congress and the public informed and give ample time to review any deal before votes are considered."

While the administration touted the new agreement to replace NAFTA as perhaps "the largest trade deal ever," observers, including former Obama administration economic advisor Austan Goolsbee, see it as making incremental changes to the existing deal. In addition, Goolsbee noted the new agreement's similarity to the TPP, from which President Trump withdrew soon after his inauguration.

"These are small - it's pretty insignificant things," Goolsbee said in an interview on NPR Aug. 31. "There's a couple of things on environmental that they agreed on, many of which it looked like they kind of just took from the Trans-Pacific Partnership, which the president pulled the U.S. out of, but was an agreement that both Canada and Mexico signed onto. So there was a natural kind of a portfolio of things that they could choose to update NAFTA with," he added.

Unions took a wait and see attitude. "This deal is more than just a labor chapter. Effective measures to stop the outsourcing of manufacturing to Mexico in many sectors, like auto, aerospace, service jobs and others, are of paramount importance. We will reserve final judgment on the value of this deal for working families until we can review the full and final text," AFL-CIO said in a statement Aug. 31.

Other trade experts also weighed in. "Dividing NAFTA into two separate deals could require the administration to restart the lengthy TPA process for the two separate negotiations with Canada and Mexico or forgo it and risk changes to the deals by Congress that Canada and Mexico might not accept," three scholars from the Center for Strategic & International Studies (CSIS) said in an email post.

## White House Allows Section 232 Country Exclusions

Admitting what many in industry had argued for months, the administration Aug. 29 allowed companies to apply for product exclusions on steel from South Korea, Argentina, and Brazil, and aluminum from Argentina, all of whom have reached quota deals with the administration that exempt them from Section 232 tariffs.

“This proclamation provides the Department the same product exclusion authority for quotas that we already have for tariffs,” Commerce Secretary Wilbur Ross said in a statement the next day. Companies can apply for product exclusions based on insufficient quantity or quality available from U.S. steel or aluminum producers. In such cases, an exclusion from the quota may be granted and no tariff would be owed, Commerce noted.

At a hearing in July, House Ways and Means Committee trade subcommittee members raised this very issue, appearing to be just as frustrated with the unruly product exclusion process as those manufacturers dependent on steel and aluminum imports (see **WTTL**, July 30, page 9).

The White House proclamation explained further. “The quantitative limitations ...have in some cases already filled for this year, and that projects in the United States employing thousands of workers may be significantly disrupted or delayed because imports of specific steel articles, which were contracted for purchase prior to my decision to adjust imports of these articles, cannot presently be entered into the United States because the quantitative limits have already been reached,” it said.

Ways and Means Chairman Kevin Brady (R-Texas) welcomed the announcement. “I hope that these expansions to Commerce’s authority to issue product exclusions will make a real difference to the hundreds of U.S. companies in Texas and throughout the country that await a decision on their product exclusion requests. Now that these very helpful improvements are in place, I am confident that Commerce will continue to expedite and streamline the process using its existing authority to make relief broadly available and extend it where there are no objections.”

The Motor & Equipment Manufacturers Association (MEMA) called it a “win for motor vehicle parts suppliers” in a statement. “While there is still a need for improvement, these are good first steps in fixing a problematic process,” it added. In a letter to the trade subcommittee in August, MEMA called the exclusion process “onerous, expensive, and confusing,” adding that it was also “opaque, inconsistent, and inaccessible.”

## Legg Mason Settles SEC FCPA Charges

The second shoe dropped Aug. 27 when Maryland-based investment management firm Legg Mason agreed to pay \$34 million in disgorgement and prejudgment interest to resolve a Securities and Exchange Commission (SEC) charge of violating the Foreign Corrupt Practices Act (FCPA) in a scheme to bribe Libyan government officials.

Between 2004 and 2010, a Legg Mason subsidiary, Permal Group Ltd., partnered with French financial services firm Societe Generale to solicit business from state-owned financial institutions in Libya. The firm and Societe Generale agreed in June to settle separate, but related Justice charges (see **WTTL**, June 11, page 3).

A Libyan intermediary in the scheme “used the term ‘cooking’ to describe his ability to cause Libyan government officials to invest with Société Générale and Permal by any means necessary, including bribes, threats, and intimidation,” the SEC order noted. “Legg Mason failed in a timely manner to devise and maintain an adequate system of internal accounting controls with respect to the Company’s widespread use of introducing brokers and other intermediaries in emerging markets, including Libya,” it added.

In June, Legg Mason entered into a non-prosecution agreement (NPA) and agreed to pay \$64.2 million, including a \$32.6 million penalty and \$31.6 million in disgorgement of profits. The SEC noted it was not imposing a civil penalty based on the agreement with Justice. At the time of that settlement, the company said that “the misconduct by former employees of the legacy Permal business that the government found was totally unacceptable. It violated our high standards, our long-held core values and our ‘no-chalk’ culture.”

## **U.S. Takes Complaint over Russian Duties to WTO**

Add Russia to the list of World Trade Organization (WTO) members with which U.S. has launched formal dispute consultations over duties those countries imposed in response to U.S. Section 232 tariffs on steel and aluminum imports. The U.S. Aug. 20 claimed the additional duties applied by Russia on certain U.S. imports violate the country’s WTO commitments.

“Russia does not impose the additional duties measure on like products originating in the territory of any other WTO Member. Russia also appears to be applying rates of duty to U.S. imports greater than the rates of duty set out in Russia's schedule of concessions,” the request said.

Russia filed a dispute complaint of its own in July with the U.S. over the steel and aluminum tariffs, the seventh launched by a WTO member. Two weeks later, the U.S. launched five separate WTO disputes against China, the European Union (EU), Canada, Mexico and Turkey (see **WTTL**, July 23, page 2).

## **Judge Blocks Posting of 3-D Gun Blueprints Again**

A Seattle U.S. District Court judge Aug. 27 granted a preliminary injunction against the Trump administration’s settlement with Defense Distributed over posting of 3-D gun blueprints online. However, the organization found a loophole that the judge allowed, posting the blueprints for sale the day after the ruling.

In a brief filed in court a week before, Justice argued that eight states' attorneys general and the District of Columbia are firing blanks, The "plaintiffs misunderstand the fundamental limit on the State Department's authority," the department said (see **WTTL**, Aug. 20, page 1).

The judge called that argument "wholly unpersuasive" in his latest ruling. "The federal defendants assert that, because the AECA [Arms Export Control Act] regulates the export of defense articles, a change in their regulatory stance cannot be the cause of the domestic effects of which plaintiffs complain. As discussed in the standing analysis, this argument ignores reality and is wholly unpersuasive," District Judge Robert S. Lasnik wrote.

In his ruling, the judge did not weigh in on the First Amendment argument, but said, "That right is currently abridged, but it has not been abrogated. Regulation under the AECA means that the files cannot be uploaded to the internet, but they can be emailed, mailed, securely transmitted, or otherwise published within the United States." Defense Distributed used that loophole to post the blueprints for sale the day after the ruling.

## **Administration Adds Seasoning to \$12 Billion Tariff Relief**

A month after announcing \$12 billion in assistance for farmers impacted by retaliatory tariffs, the administration Aug. 27 added some details to the plan. While the original relief plan included broad contours, Agriculture (USDA) was tasked with finalizing the plan details.

In what some might call a drop in the feed bucket, the administration announced the assistance plan for farmers in July (see **WTTL**, July 30, page 4). Specifically, these programs will assist agricultural producers to meet the costs of disrupted markets, the department said: USDA's Farm Service Agency (FSA) will administer the Market Facilitation Program (MFP) to provide payments to corn, cotton, dairy, hog, sorghum, soybean and wheat producers starting Sept. 4.

In addition, USDA's Agricultural Marketing Service (AMS) will purchase up to \$1.2 billion in commodities unfairly targeted by unjustified retaliation. USDA's Food and Nutrition Service (FNS) will distribute these commodities through nutrition assistance programs and child nutrition programs. Lastly, \$200 million will be made available to identify and access new foreign markets for U.S. agricultural products through the Foreign Agricultural Service's (FAS) Agricultural Trade Promotion Program (ATP).

Farm groups welcomed the details. American Soybean Association President John Heisdorffer called the plan a "real shot in the arm" for growers in a statement. "This assistance will be particularly helpful to farmers who didn't forward-contract their crop earlier this year and who need to arrange financing for planting next year's crop," he added.

Other groups applauded the plan, but want more action from the administration. "While we're grateful and commend the administration for its action to help us, what pork

producers really want is to export more pork, and that means ending these trade disputes soon,” National Pork Producers Council (NPPC) President Jim Heimerl said. NPPC said pork producers would receive \$8 per hog based on 50% of the number of animals they owned on Aug. 1.

## Justice Closes Two FCPA Cases Under New Policy

After months of silence, Justice announced it has declined to prosecute two companies under its recent Foreign Corrupt Practices Act (FCPA) Corporate Enforcement Policy. One, Insurance Corporation of Barbados Limited (ICBL), allegedly paid \$36,000 in bribes to a Barbadian government official in exchange for insurance contracts. The other, a United Kingdom (UK)-based manufacturer of broadband seismic instrumentation made payments to the director of a Korean earthquake research center.

After an 18-month pilot program to encourage cooperation in potential FCPA violations, Justice enshrined those tenets in a revised policy in November 2017 (see [WTTL](#), Dec. 4, page 4).

In its declination letter to ICBL dated Aug. 23, Justice cited the bribes paid to Donville Inniss, a Barbadian government official, between August 2015 and April 2016. “In exchange for the bribes from the ICBL employees, Inniss leveraged his position as the Minister of Industry to enable the Barbadian insurance company to obtain two government contracts,” the letter noted.

“To conceal the bribes, Inniss, who is a U.S. legal permanent resident and maintains a residence in the United States, arranged to receive them through a U.S. bank account in the name of a dental company that was located in Elmont, New York, and owned by his friend who is a U.S. citizen. Inniss’ friend then assisted Inniss in further transferring portions of the bribes from the dental company bank account in New York to a bank account in the name of Inniss that was located in Tampa, Florida.”

Despite the “high-level involvement of corporate officers in the misconduct,” Justice closed the case for the following reasons: ICBL’s timely, voluntary self-disclosure; the company’s thorough and comprehensive investigation; its cooperation and its agreement to continue to cooperate; ICBL’s disgorgement agreement; the steps the firm has taken to enhance its compliance program and its internal accounting controls; its remediation, including but not limited to terminating all of the involved executives and employees; and “the fact that the department has been able to identify and charge the culpable individuals.”

Under the declination letter, ICBL agreed to disgorge \$93,940.19 in profits. “This letter does not provide any protection against prosecution of any individuals, regardless of their affiliation with ICBL. If the Department learns information that changes its assessment of any of the factors outlined above, it may reopen its inquiry,” Justice noted.

Three days earlier, Justice also issued a declination letter to Guralp Systems Limited (GSL) Aug. 20, closing its investigation into possible violations of the FCPA and U.S.

money laundering statutes resulting from GSL's payments to Heon-Cheol Chi, the director of the Earthquake Research Center at the Korea Institute of Geoscience and Mineral Resources, the letter noted.

In its declination letter, Justice cited these reasons: GSL's voluntary disclosure, significant remedial efforts and substantial cooperation. In addition, GSL is "the subject of an ongoing parallel investigation by the UK's Serious Fraud Office for violations of law relating to the same conduct and has committed to accepting responsibility for that conduct with the SFO," it noted.

## **U.S. Still Opposes WTO Appellate Reappointment**

Amid reports that the administration is considering withdrawing from the WTO, its actions could simply chip away at the body's ability to settle disputes. At the monthly meeting of the WTO's Dispute Settlement Body (DSB) Aug. 27, the U.S. repeated its long-held opposition to the reappointment of Appellate Body member Shree Baboo Chekitan Servansing. Without it, the body will be down to its minimum of three members when Servansing's term ends Sept. 30.

The U.S. again noted its opposition was not the rejection of any one individual, but based on its longstanding concerns regarding abuse of the system. Most recently, in its 2018 trade policy report, USTR cited concerns including issuing rulings on antidumping and subsidy practices which go against the public interest to guard against unfair trade practices, issuing advisory opinions "not necessary to resolve the dispute," and its "decision to ignore the mandatory 90-day deadline for deciding appeals."

Also at the meeting, the DSB agreed to establish a panel to determine whether the EU complied with the WTO ruling in the dispute illegal subsidies provided for Airbus. The U.S. blocked EU's first request at a special meeting in August (see **WTTL**, Aug. 20, page 4). The EU claims it has removed the subsidies or taken appropriate steps to remove their adverse effects and is now in compliance with the WTO ruling; the U.S. disagrees.

The U.S. also blocked Korea's two first requests for panels to rule whether US safeguard measures on imported solar cells and imported large residential washers are compatible with WTO rules. Korea requested WTO dispute consultations in May (see **WTTL**, May 21, page 10). Unfortunately, these consultations were not fruitful, prompting Korea to request the establishment of a panel, a Geneva trade official noted.

## **Ex-Im Timely in Making Dual-Use Determinations, GAO Says**

While the Export-Import Bank (Ex-Im) is generally monitoring dual-use exports on whether they comply with bank policies ahead of internal deadlines, some of those initial determinations lacked sufficient detail and needed clarification, according to a Govern-

ment Accountability Office (GAO) report (GAO-18-683R) released Aug. 30. This year, the bank again determined that dual-use exports under two financed transactions are used mostly for civilian purposes: fixed- and mobile-service satellites for the Mexican government, and construction equipment for the government of Cameroon. Ex-Im “received all documents from the government of Mexico on time and made a timely determination that Mexico was in compliance with the bank's dual-use policy, but did not clearly document this determination until 3 months later,” the report said.

“In response to our questions noting that the email did not specify whether the certification was sufficient to make an annual dual-use compliance determination in accordance with the bank’s dual-use policy, the engineer issued a more comprehensive statement clarifying that the certification and supporting data were sufficient for this purpose and demonstrated that the primarily civilian use of the satellite terminals was compliant with the dual-use policy,” it added.

“The bank received the government of Cameroon’s annual end-use certification several days late and made a timely dual-use compliance determination for the Cameroon construction equipment,” it added. Ex-Im did not finance any new exports under its dual-use authority in fiscal year 2017 due to its lack of quorum.

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

**ELECTRONICS**: In Federal Register Aug. 30, DDTTC extended temporary controls on certain intelligence analytics software under USML Category XI (military electronics) by reinserting words “analyze and produce information from” and by adding software to description of items controlled in paragraph (b). Changes will be effective until Aug. 30, 2019. State in February published parallel notices of inquiry requesting public comments on USML categories V, X and XI (see **WTTL**, April 23, page 5).

**EX-IM BANK**: Senate Banking Committee Aug. 23 unanimously approved Kimberly Reed to lead Export-Import Bank (Ex-Im). Reed sailed through nomination hearing month before (see **WTTL**, July 23, page 11). Manufacturers immediately applauded vote. “We call on the Senate to confirm her as soon as possible,” Aerospace Industries Association tweeted same day. President “put forward a strong nominee and every senator who supports American manufacturing workers should support her nomination,” NAM President Jay Timmons tweeted.

**MUSICAL CHAIRS**: President Aug. 27 nominated Treasury official Marshall Billingslea to be under secretary of State for civilian security, democracy and human rights. Senate confirmed Billingslea to be Treasury assistant secretary for terrorist financing in 65-35 vote in June 2017 (see **WTTL**, June 26, 2017, page 9). Prior to Treasury, Billingslea was managing director for Deloitte Advisory and previously spent more than decade at Defense.

**PAPER**: U.S. Aug. 27 appealed WTO panel report in dispute with Canada over supercalendered (SC) paper. Panel in July report upheld many of Canada’s claims that U.S. countervailing duties (CVD) applied to SC paper imports and Commerce’s use of adverse facts available (AFA) were inconsistent with WTO rules (see **WTTL**, July 9, page 3).

**ANTIBOYCOTT**: N.Y.-based Citibank, NA agreed Aug. 2 to pay \$60,000 civil penalty to settle 20 violations of BIS antiboycott regulations. Company allegedly furnished information about business

relationships with boycotted countries or blacklisted persons from 2012 through March 2016 during transactions with Kuwait, Lebanon, Oman, Pakistan, Qatar and UAE. Bank voluntarily disclosed information concerning certain of its transactions to BIS, agency noted.

**STEEL BAR:** In 5-0 “sunset” vote Aug. 24, ITC said revoking antidumping duty orders on imports of stainless steel bar from India would renew injury to U.S. industry. At same time, commission said in 5-0 votes revoking antidumping duty orders on imports of stainless steel bar from Brazil, Japan and Spain would not renew injury to U.S. industry.

**ZTE:** Commerce Secretary Wilbur Ross Aug. 24 named Roscoe Howard, Jr. to be Special Compliance Coordinator (SCC) for ZTE deal (see **WTTL**, July 30, page 2). Howard is partner in Barnes & Thornburg’s litigation department in Washington office. He previously served as D.C. U.S. Attorney from 2001-2004 and has twice served as associate independent counsel under both Republican and Democrat presidents. SCC’s function will be to “coordinate, monitor, assess, and report on compliance with U.S. export control laws by ZTE, its subsidiaries, and affiliates worldwide,” Commerce said in press release.

**NEWSPRINT:** Print journalists rejoice. In 5-0 final vote Aug. 29, ITC found U.S. industry is not materially injured by dumped and subsidized imports of uncoated groundwood paper (newsprint) from Canada. Sen. Susan Collins (R-Maine) introduced bipartisan Protecting Rational Incentives in Newsprint Trade (PRINT) Act of 2018 (S.2835) in May to suspend import duties while Commerce examines industry. Department announced final affirmative determinations in August (see **WTTL**, Aug. 6, page 6).

**EXPORT ENFORCEMENT:** Indictment against Johnny Paul Tourino of Dana Point, Calif., owner of Spectra Equipment, Inc., was unsealed Aug. 17 in Santa Ana U.S. District Court on charges of conspiracy to procure and illegally ship export-controlled computer servers to Iran via UAE and Hong Kong from January 2014 through July 2017. Servers were controlled under ECCN 5A002.A for anti-terrorism and national security reasons. Tourino was arrested in February and released on \$100,000 bond. Trial is scheduled for March 2019.

**MORE EXPORT ENFORCEMENT:** Ghobad Ghasempour, Canadian national, was sentenced Aug. 20 in Seattle U.S. District Court to 42 months in prison followed by 3 years’ supervised release for conspiracy to unlawfully export U.S. dual-use goods to Iran between 2011 and 2017. He was arrested in March 2017 and has been in custody since. Ghasempour pleaded guilty in April 2018. Items included thin film measurement system (ECCN 3A999.f), inertial guidance system test table (ECCN 2B120) and two types of thermal imaging cameras (ECCNs 6A993 and 6A003).

**TARIFFS:** China Aug. 27 requested formal WTO consultations over additional U.S. Section 301 tariffs of 25% applied to \$16 billion in annual Chinese imports, claiming they are inconsistent with U.S. WTO commitments. China previously requested consultations over U.S. safeguard duties imposed on solar-cell imports and state-level incentives for using domestically sourced renewable energy products and technologies (see **WTTL**, Aug. 20, page 4).

**ENTITY LIST:** BIS in Federal Register Sept. 4 added 15 entities to Entity List under 17 entries in China, Hong Kong, Pakistan, Russia, Saudi Arabia, Turkey, United Arab Emirates (UAE) and United Kingdom. At same time, agency modified listing of two entries in Hong Kong and Russia and removed Top Electronics Components S.A., in Greece as “result of a request for removal.” Top Electronics was added to list in October 2012.