



UNITED STATES DEPARTMENT OF COMMERCE  
BUREAU OF INDUSTRY AND SECURITY  
WASHINGTON, D.C. 20230

11/27/2008  
CCATS #: G067437  
PAGE NO: 1

SQUIRE, SANDERS & DEMPSEY L.L.P.  
ATTN: GEORGE GRAMMAS  
1201 PENNSYLVANIA AVE., NW  
SUITE 500  
WASHINGTON, DC 20004

The following information is in response to your inquiry of 10/01/2008 requesting licensing information for:

Item	Export Control Classification Number and Paragraph	License Exceptions Available	Country Chart Column (reason for control)	LVS Dollar Value Limit
1) SOFTWARE FOR DATA PROTECTION THAT IS DEPLOYED ACROSS THE CUSTOMER'S COMPUTER NETWORK.  MODEL NUMBER: DATA PROTECTION PLATFORM 9.X	5D992  (C)		AT1	
2) REMOVABLE STORAGE ENCRYPTION 3.X IS SOFTWARE DESIGNED TO PROTECT ALL DATA ON USB, FIREWIRE, PORTABLE HARD DRIVES, FLASH MEMORY CARDS, IPODS AND OTHER STORAGE DEVICES.  MODEL NUMBER: REMOVABLE STORAGE ENCRYPTION	5D992  (C)		AT1	

See the other side of this form for information on determining which countries require a license for the above items. For Shipments to these destinations, an export license is required from the Bureau of Export Administration.

Items otherwise eligible for export or reexport under a License Exception or NLR (no license required) and used in the design, development, production or use of nuclear, chemical or biological weapons or missiles require a license for export or reexport as provided in part 744 of the Export Administration Regulations (EAR).

CATHERINE PRATT  
DIVISION DIRECTOR

FOR INFORMATION CONCERNING  
THIS CLASSIFICATION CONTACT  
JUDITH CURRIE  
PHONE #: (202) 482-5085  
BIS/STC/IT



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CCATS #: G067437  
PAGE NO: 2

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3) HARD DISK ENCRYPTION 9.X IS SOFTWARE DESIGNED TO PROTECT ALL DATA ON THE HARD OF A MICROSOFT WINDOWS-BASED MACHINE.  MODEL NUMBER: HARD DISK ENCRYPTION  COMMENTS FROM LICENSING OFFICER:  ITEM #1: THIS ENCRYPTION ITEM IS AUTHORIZED FOR EXPORT AND REEXPORT UNDER SECTION 742.15(B) OF THE EXPORT ADMINISTRATION REGULATIONS (REVIEW REQUIREMENT FOR MASS MARKET ENCRYPTION COMMODITIES AND SOFTWARE EXCEEDING 64 BITS). ITEM #2: THIS ENCRYPTION ITEM IS AUTHORIZED FOR EXPORT AND REEXPORT UNDER SECTION 742.15(B) OF THE EXPORT ADMINISTRATION REGULATIONS (REVIEW REQUIREMENT FOR MASS MARKET ENCRYPTION COMMODITIES AND SOFTWARE	5D992  (C)		AT1	

See the other side of this form for information on determining which countries require a license for the above items. For Shipments to these destinations, an export license is required from the Bureau of Export Administration.

Items otherwise eligible for export or reexport under a License Exception or NLR (no license required) and used in the design, development, production or use of nuclear, chemical or biological weapons or missiles require a license for export or reexport as provided in part 744 of the Export Administration Regulations (EAR).

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11/27/2008  
CCATS #: G067437  
PAGE NO: 3

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<p>EXCEEDING 64 BITS). ITEM #3: THIS ENCRYPTION ITEM IS AUTHORIZED FOR EXPORT AND REEXPORT UNDER SECTION 742.15(B) OF THE EXPORT ADMINISTRATION REGULATIONS (REVIEW REQUIREMENT FOR MASS MARKET ENCRYPTION COMMODITIES AND SOFTWARE EXCEEDING 64 BITS).</p>				

See the other side of this form for information on determining which countries require a license for the above items. For Shipments to these destinations, an export license is required from the Bureau of Export Administration.

Items otherwise eligible for export or reexport under a License Exception or NLR (no license required) and used in the design, development, production or use of nuclear, chemical or biological weapons or missiles require a license for export or reexport as provided in part 744 of the Export Administration Regulations (EAR).

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01/28/2009  
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SQUIRE, SANDERS & DEMPSEY L.L.P.  
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The following information is in response to your inquiry of 09/23/2008 requesting licensing information for:

Item	Export Control Classification Number and Paragraph	License Exceptions Available	Country Chart Column (reason for control)	LVS Dollar Value Limit
1) ENTERPRISE SOFTWARE PRODUCT FOR PROTECTING SENSITIVE AND PRIVATE INFORMATION AGAINST DATA LEAKAGE BY PREVENTING UNAUTHORIZED TRANSFER OF DATA FROM PERSONAL COMPUTERS.  MODEL NUMBER: GUARDIANEDGE DEVICE CONTROL  COMMENTS FROM LICENSING OFFICER:  ITEM #1: THIS ENCRYPTION ITEM IS AUTHORIZED FOR EXPORT AND REEXPORT UNDER SECTION 742.15(B) OF THE EXPORT ADMINISTRATION REGULATIONS (REVIEW REQUIREMENT FOR MASS MARKET ENCRYPTION COMMODITIES AND SOFTWARE EXCEEDING 64 BITS).	5D992  (B)		AT1	

See the other side of this form for information on determining which countries require a license for the above items. For Shipments to these destinations, an export license is required from the Bureau of Export Administration.

Items otherwise eligible for export or reexport under a License Exception or NLR (no license required) and used in the design, development, production or use of nuclear, chemical or biological weapons or missiles require a license for export or reexport as provided in part 744 of the Export Administration Regulations (EAR).

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## LICENSING REQUIREMENTS.

APPLICATIONS FOR EXPORT MUST BE SUBMITTED ON FORM BIS-748P MULTIPURPOSE APPLICATION. THESE FORMS MAY BE OBTAINED BY CALLING (202) 482-3332 OR REQUESTING DIRECTLY ON THE BIS INTERNET WEB SITE. ASSISTANCE IN FILLING OUT THE FORM, OR ANY ASPECT OF EXPORTING, IS PROVIDED BY THE EXPORT COUNSELING DIVISION IN WASHINGTON, D.C. AT (202) 482-4811 OR THE WESTERN REGIONAL OFFICE IN NEWPORT BEACH, CALIFORNIA AT (714) 660-0144.

LICENSE EXCEPTIONS  
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BE AWARE THAT THE LICENSING REQUIREMENTS FOR SOME DESTINATIONS MAY BE OVERCOME BY ANY LICENSE EXCEPTION FOR WHICH YOUR ITEMS QUALIFY. SEE PART 740 OF EAR FOR INFORMATION ON LICENSE EXCEPTIONS. THE LICENSE AVAILABLE COLUMN ON THIS FORM LISTS ONLY THOSE LICENSE EXCEPTIONS OF THE SET GBS, CIV, APP, TSR WHICH ARE APPLICABLE TO YOUR ITEMS. OTHER LICENSE EXCEPTIONS MAY APPLY, DEPENDING UPON THE CIRCUMSTANCES OF YOUR INTENDED TRANSACTION.

EXPORT CONTROL CLASSIFICATION NUMBERING SYSTEM (ECCN)  
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THE ECCN NUMBERING SYSTEM IS FOUND IN THE COMMERCE CONTROL LIST (CCL) PART 774 OF THE EAR. THE CCL IS A COMPREHENSIVE LIST THAT IDENTIFIES ALL ITEMS CONTROLLED AND LICENSED BY COMMERCE. WITHIN THE CCL, ENTRIES ARE IDENTIFIED BY AN ECCN. EACH ENTRY SPECIFIES THE LICENSE REQUIREMENTS FOR THE ITEM AND THE REASON(S) FOR CONTROL. PLEASE CONSULT PARTS 738 AND 774 OF THE EAR FOR SPECIFIC INFORMATION ON ECCNS.

SHIPPERS EXPORT DECLARATION (SED)  
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WHEN AN EXPORT IS MADE, IT IS NECESSARY FOR THE EXPORTER TO SHOW ON THE SHIPPERS EXPORT DECLARATION (FORM 7525-V) IN BLOCK 27 EITHER THE LICENSE NUMBER, THE APPLICABLE LICENSE EXCEPTION SYMBOL OR THE SYMBOL NLR. FORM 7525-V IS AVAILABLE FROM THE SUPERINTENDENT OF DOCUMENTS, U.S. GOVERNMENT PRINTING OFFICE OF WASHINGTON, D.C. 20402, AND FROM EXPORT ADMINISTRATION DISTRICT OFFICES (U.S. DEPT. OF COMMERCE).

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Work Item SSD0020 Work Item SSD0020 Acknowledgements and Validations

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