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January 28, 2021

Ms. Michelle Thompson
Open Research Institute, Inc.
3525 Del Mar Heights Road, #1873
San Diego, CA 92130

Re: Commodity Classification for ORI Satellite and Ground Station Technology, ORI Software (Binary), ORI Technology for the ORI Software (Binary), ORI Software Source Code, ORI Technology for the ORI Software Source Code: CCATS G185407

Dear Michelle:

We have received the commodity classification from the Department of Commerce for the ORI Satellite and Ground Station Technology, ORI Software (Binary), ORI Technology for the ORI Software (Binary), ORI Software Source Code, and ORI Technology for the ORI Software Source Code, in response to the application we filed on October 5, 2020. A copy of the Commodity Classification Determination (Form BXA-6002L) is attached for your records.

In the following table, we have summarized the classifications received for each item, along with the associated export authorizations and reporting requirements (if any) under current regulations.

CCATS G185407

Product	ECCN	Export Authorizations (See Definitions List Below)
ORI Satellite and Ground Station Technology	9E515.a	No License or License Exception Required (NLR) to Canada License Exception STA for Country Group A:5
ORI Software (Binary)	9D515.a	No License or License Exception Required (NLR) to Canada License Exception STA for Country Group A:5

Product	ECCN	Export Authorizations (See Definitions List Below)
ORI Technology for the ORI Software (Binary)	9E515.a	No License or License Exception Required (NLR) to Canada License Exception STA for Country Group A:5
ORI Software Source Code	9D515.b.2	No License or License Exception Required (NLR) to Canada
ORI Technology for the ORI Software Source Code	9E515.b	No License or License Exception Required (NLR) to Canada

Other License Requirements

Please be aware that the authorizations summarized herein are applicable only to the Commerce Department's country-based export controls. Other case-by-case factors could trigger additional license requirements. For example, transactions involving restricted persons/entities or transactions involving proliferation-related end-uses could trigger license requirements to which the noted authorizations are not applicable. Certain items are also subject to military end-user/end-use controls in Part 744 of the EAR.

In addition to U.S. export control requirements, other countries may also require *import* licenses or permits for encryption products. These countries include France, Israel, Russia, Hong Kong, Philippines, and China, among others.

Finally, U.S. Customs and Border Protection and U.S. Census Bureau administer separate classifications for tariff calculations and statistical analysis. The relevant classification lists are the Harmonized Tariff Schedule (HTS) and Schedule B. Please be aware that these are separate classifications from the ECCNs noted herein.

Please contact us if you require assistance with any of these additional license requirements, or with any reporting. Please also note that future product changes and future regulatory changes can impact the classification and filing requirements.

Definitions

Country Group A:5: Argentina, Australia, Austria, Belgium, Bulgaria, Canada, Croatia, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Iceland, India, Ireland, Italy, Japan, Latvia, Lithuania, Luxembourg, Netherlands, New Zealand, Norway, Poland, Portugal, Romania, Slovakia, Slovenia, South Korea, Spain, Sweden, Switzerland, Turkey, United Kingdom

License Exception STA (Strategic Trade Authorization) – Where applicable License Exception STA may be used after receipt of signed Consignee statement in accordance with Section [740.20](#) of the EAR.