

**Commodity Classification**  
**Case Number: Z1667514**  
**Date of Completion:**  
**January 26, 2021**



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

Open Research Institute, Inc.  
C/O THOMSEN AND BURKE LLP  
ATTN: Heather Green  
TWO HAMILL ROAD  
SUITE 415  
BALTIMORE, MD 21210

G185407

THE FOLLOWING INFORMATION IS IN RESPONSE TO YOUR INQUIRY OF October 5, 2020 REQUESTING  
COMMODITY CLASSIFICATION(S) FOR:

COMMODITY	ECCN	SUBPARAGRAPH
ORI Satellite and Ground Station Technology is the technology for the ORI projects. It includes information related to the design and development of amateur radio software and hardware for space (Amateur Radio satellites in geosynchronous orbit) and corresponding ground stations. In the United States, the Amateur Radio Service and Amateur Satellite Service are defined by the Federal government in 47 CFR 97 and administered by the Federal Communications Commission. ECCN requested is 9E515.a ORI Satellite &Gr. StationTech	9E515	a
ORI Software (Binary) is software in binary/object code form for the design and development of Amateur Radio satellites in geosynchronous orbit and for the design and development of satellite ground stations. ECCN requested is ECCN 9D515.a ORI Software (Binary)	9D515	a
ORI Technology for the ORI Software (Binary) is the information necessary for the information necessary for the development, production and use of the ORI Software (Binary) described above. The information takes the form of (a) technical data (blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, manuals, object code, source code and instructions written or recorded); or (b) technical assistance (instruction, skills training, working knowledge, consulting services). ECCN requested is 9E515.a ORI Tech.for ORI Soft.(Binary)	9E515	a
ORI Software Source Code is software in source code form for the design and development of Amateur Radio satellites in geosynchronous orbit and for the design and development of satellite ground stations. ECCN requested is 9D515.b.2 ORI Software Source Code	9D515	b.2
ORI Technology for the ORI Software Source Code is the information necessary for the information necessary for the development, production and use of the ORI Software Source Code described above. The information takes the form of (a) technical data (blueprints, plans, diagrams, models, formulae, tables, engineering designs and specifications, manuals, object code, source code and	9E515	b

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COMMODITY	ECCN	SUBPARAGRAPH
instructions written or recorded); or (b) technical assistance (instruction, skills training, working knowledge, consulting services). ECCN requested is 9E515.b ORI Tech. for ORI Soft.So.Code		

**COMMENTS FROM LICENSING OFFICER(S):**

**ITEM #1:**

Based on the information provided, this item is classified under ECCN 9E515.a and is controlled for National Security, Regional Stability and Anti-Terrorism reasons with NS Column 1, RS Column 1 and AT Column 1 license requirements. In addition, the applicant must also comply with General Prohibitions four (4) through ten (10) listed in Part 736 of the Export Administration Regulations. Items otherwise eligible for export under NLR may require a license if the exporter knows or is informed that the items will be used in prohibited chemical biological or nuclear weapons or missile activities or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

**ITEM #2:**

Based on the information provided, this item is classified under ECCN 9D515.a and is controlled for National Security, Regional Stability and Anti-Terrorism reasons with NS Column 1, RS Column 1 and AT Column 1 license requirements. In addition, the applicant must also comply with General Prohibitions four (4) through ten (10) listed in Part 736 of the Export Administration Regulations. Items otherwise eligible for export under NLR may require a license if the exporter knows or is informed that the items will be used in prohibited chemical biological or nuclear weapons or missile activities or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

**ITEM #3:**

Based on the information provided, this item is classified under ECCN 9E515.a and is controlled for National Security, Regional Stability and Anti-Terrorism reasons with NS Column 1, RS Column 1 and AT Column 1 license requirements. In addition, the applicant must also comply with General Prohibitions four (4) through ten (10) listed in Part 736 of the Export Administration Regulations. Items otherwise eligible for export under NLR may require a license if the exporter knows or is informed that the items will be used in prohibited chemical biological or nuclear weapons or missile activities or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

**ITEM #4:**

Based on the information provided, this item is classified under ECCN 9D515.b.2 and is controlled for National Security, Regional Stability and Anti-Terrorism reasons with NS Column 1, RS Column 1 and AT Column 1 license requirements. In addition, the applicant must also comply with General Prohibitions four (4) through ten (10) listed in Part 736 of the Export Administration Regulations. Items otherwise eligible for export under NLR may require a license if the exporter knows or is informed that the items will be used in prohibited chemical biological or nuclear weapons or missile activities or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

**ITEM #5:**

Based on the information provided, this item is classified under ECCN 9E515.b and is controlled for National Security, Regional Stability and Anti-Terrorism reasons with NS Column 1, RS Column 1 and AT Column 1 license requirements. In addition, the applicant must also comply with General Prohibitions four (4) through ten (10) listed in Part 736 of the Export Administration Regulations. Items otherwise eligible for export under NLR may require a

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license if the exporter knows or is informed that the items will be used in prohibited chemical biological or nuclear weapons or missile activities or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

MICHAEL RITHMIRE  
DIVISION DIRECTOR

FOR INFORMATION CONCERNING  
THIS CLASSIFICATION CONTACT  
Michael Tu  
PHONE #:  
BIS/EA/STC/SA