



ECS-2026-001

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Developer

DATE: January 14, 2026

SOFTWARE: PdfSigner v1.0.5

REPOSITORY: <https://github.com/brucedombrowski/PdfSigner>

SUBJECT: Export Control Classification and License Exception Determination

1. Purpose

This Export Compliance Statement certifies the export control classification of PdfSigner version 1.0.5 and documents compliance with the Export Administration Regulations (EAR).

2. Software Classification

PdfSigner is classified under:

- **ECCN:** 5D002 — Information Security Software
- **License Exception:** TSU (Technology and Software Unrestricted)
- **Authority:** 15 CFR § 740.13(e)

3. Basis for TSU Eligibility

This software qualifies for License Exception TSU because it meets all requirements under 15 CFR § 740.13(e):

- **Publicly Available:** Source code is publicly available at <https://github.com/brucedombrowski/PdfSigner>
- **No Restrictions:** Released under MIT License with no payment or distribution restrictions
- **Standard Cryptography:** Uses standard cryptographic libraries (BouncyCastle, .NET) without custom cryptographic implementations

4. Cryptographic Functionality

PdfSigner performs **digital signing operations only**. It does not perform encryption for data confidentiality.



Operation	Implementation
Hash Algorithm	SHA-256
Signature Algorithms	RSA, ECDSA (via Windows Certificate Store)
Signature Format	CMS (Cryptographic Message Syntax)

5. **BIS Notification**

Per 15 CFR § 740.13(e)(3), notification of publicly available encryption source code was submitted to:

- Bureau of Industry and Security (BIS): crypt@bis.doc.gov
- ENC Encryption Request Coordinator: enc@nsa.gov

Notification Date: January 14, 2026

6. **Export Restrictions**

This software may not be exported or re-exported to:

- Countries under U.S. embargo: Cuba, Iran, North Korea, Syria, and the Crimea, Donetsk, and Luhansk regions of Ukraine
- Denied persons or entities on the BIS Entity List
- End-users involved in weapons of mass destruction proliferation

7. **Certification**

I certify that the information contained in this statement is accurate and complete to the best of my knowledge, and that PdfSigner version 1.0.5 is eligible for export under License Exception TSU per 15 CFR § 740.13(e).