**PRD-27 — Encryption (ENC/CCATS) Manager**

*(Tracks ENC self-classification/annual reports & CCATS where required)*  
**Authority notes:** **License Exception ENC (EAR 740.17)** supports **annual self-classification**; some items require **CCATS** submission. [Bureau of Industry and Security+3Bureau of Industry and Security+3Bureau of Industry and Security+3](https://www.bis.gov/ear/title-15/subtitle-b/chapter-vii/subchapter-c/part-740/ss-74017-encryption-commodities-software?utm_source=chatgpt.com)

**Intent**  
For encryption-bearing products, track ENC filing path, status, deadlines, and block shipments if filings lapse.

**Preconditions**

* Product “encryption present” attribute (PRD-12).
* Filing artifacts: self-classification template (Supp. No. 8 to Part 742), CCATS metadata.

**Flow (happy path)**

1. **Detect Scope**: when product flagged “encryption,” wizard asks if it fits 740.17(b)(1) self-classification or needs **CCATS**.
2. **Prepare Filing**: pre-fill self-classification from attributes; attach datasheet excerpts; generate cover email/package.
3. **Submit/Record**: log submission, recipients, **Filing Receipt** hash; set **annual reminder** for self-classification or CCATS renewal.
4. **Gate Hooks**: orders to controlled destinations check filing status; if expired/missing → **HOLD** with fix link.
5. **Evidence**: store BIS replies/CCATS number; add to Proof Bundle.

**Edge cases**

* Model uncertainty → advisory prompt to tighten governed fields (algorithm, key length); escalate to legal.
* Re-classification due to rule changes → PRD-06 impact run.

**Done when**

* Every encryption product shows current ENC path (self-classified/CCATS), next due date, and shipments are blocked if filings are out of date.