

OFFICE OF FOREIGN ASSETS CONTROL

REPORT OF LICENSING ACTIVITIES

PURSUANT TO

THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000

January - March 2008

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from January through March 2008. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the one-year specific licensing regime set forth in Section 906 of the TSRA.

From January 1 to March 31, 2008, OFAC's Licensing Division received a total of 280 applications pursuant to Section 906(a)(1) of the TSRA. During this reporting quarter, OFAC issued a total of 212 licensing determinations,¹ of which 72 were for cases received in this quarter. One hundred fifty four (154) licenses (average turnaround: 86 business days) and seventeen (17) license amendments² (average turnaround: 43 business days) were issued in this quarter. In addition, OFAC issued seven (7) "return-without-action" letters ("RWA letters") (average turnaround: 15 business days), and two (2) denial letters (average turnaround: 119 business days) (**See Charts 1-3 and Graph 1**).

The complexity and length of license applications (the majority of applications pertain to the export of medical devices to Iran) coupled with the more protracted scrutiny on the part of other reviewing agencies continued to affect processing time of license applications in this quarter. These cases are evaluated both in terms of whether the foreign entities involved in the transaction "promote international terrorism," as required in section 906 of the TSRA, and in terms of whether the commodities at issue implicate independent export control regimes involving chemical or biological weapons or weapons of mass destruction as provided in section 904(2)(C) of the TSRA.

¹A "licensing determination" is any action that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, a telephone call, a fax, or an e-mail.

² A "license amendment" is an amendment to an existing license previously issued by OFAC.

CHART 1
Number of License Applications and Licenses Issued by Product

| | Agricultural Commodities | Medicine | Medical Devices | TOTAL |
|---------------------------|-----------------------------|----------|--------------------|-------|
| License Applications | 104 | 31 | 145 | 280 |
| Licenses Issued | 72 | 21 | 61 | 154 |
| License Amendments Issued | 9 | 1 | 7 | 17 |
| Applications Denied | 2 | 0 | 0 | 2 |

CHART 2
Number of License Applications and Licenses Issued by Country

| | Iran | Sudan | TOTAL |
|---------------------------|------|-------|-------|
| License Applications | 239 | 41 | 280 |
| Licenses Issued | 127 | 27 | 154 |
| License Amendments Issued | 16 | 1 | 17 |
| Applications Denied | 0 | 2 | 2 |

CHART 3
Number of License Applications and Licenses Issued by Country and Product

| | Agricultural Commodities | Medicine | Medical Devices | TOTAL |
|--|-----------------------------|----------|--------------------|-------|
| IRAN | | | | |
| License Applications | 78 | 28 | 133 | 239 |
| Licenses and License Amendments Issued | 65 | 21 | 57 | 143 |
| SUDAN | | | | |
| License Applications | 26 | 3 | 12 | 41 |
| Licenses and License Amendments Issued | 16 | 1 | 11 | 28 |

GRAPH 1

**Average Processing Time for Issuing Licensing
 Determinations (Business Days)**

