

# OFFICE OF FOREIGN ASSETS CONTROL

## REPORT OF LICENSING ACTIVITIES

### PURSUANT TO

### THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000

July - September 2007

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 July through September 2007. 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 July 1 to September 30, 2007, OFAC's Licensing Division received a total of 202 applications pursuant to Section 906(a)(1) of the TSRA. During this reporting quarter, OFAC issued a total of 281 licensing determinations,<sup>1</sup> of which 63 were for cases received in this quarter. One hundred eighty three (183) licenses (average turnaround: 70 business days) and ten (10) license amendments<sup>2</sup> (average turnaround: 66 business days) were issued in this quarter. In addition, OFAC issued 37 "return-without-action" letters ("RWA letters") (average turnaround: 46 business days), and 18 denial letters (average turnaround: 105 business days) (*See Charts 1-3 and Graph 1*).

The overall average processing time for issuing licensing determinations in this quarter in response to submissions to OFAC pursuant to the TSRA regulations was 81 business days. The average time for processing cases received in this quarter was 18 business days.

The increased 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.

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<sup>1</sup>A licensing determination is defined as any action, either intermediate or final, 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.

<sup>2</sup> 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	71	18	113	202
Licenses Issued	27	95	61	183
License Amendments Issued	7	0	3	10
Applications Denied	1	2	15	18

**CHART 2**  
**Number of License Applications and Licenses Issued by Country**

	Iran	Sudan	TOTAL
License Applications	184	18	202
Licenses Issued	161	22	183
License Amendments Issued	10	0	10
Applications Denied	18	0	18

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

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
<b>IRAN</b>				
License Applications	66	15	103	184
Licenses and License Amendments Issued	61	23	87	171
<b>SUDAN</b>				
License Applications	5	3	10	18
Licenses and License Amendments Issued	11	4	7	22

**GRAPH 1**

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

