



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Washington, D.C. 20230

January 12, 2009



Dear Mr. [REDACTED]:

I am writing in response to your December 10, 2008 letter requesting an advisory opinion concerning whether a license is required for the export or reexport of software or technology related to Avionics Displays that employ techniques used to make a two dimensional (2D) image appear as three dimensional (3D). As you note, the related Export Control Classification Numbers (ECCNs) are 7D003.d.7 for software and 7E004.a.3 for technology.

The Bureau of Industry and Security (BIS) has reviewed ECCNs 7D003.d.7 and 7E004.a.3 and determined that the scope of these ECCNs is limited to 3D software and technology. Software and technology that achieve 2D techniques such as surface texture, lighting, perspective (i.e., objects further away are smaller), depth of field (i.e., objects close by are in focus and objects further away are out of focus), and anti-aliasing (i.e., making curved lines appear smooth) fall outside the scope of these ECCNs and are designated as EAR99 items.

Should you have any questions regarding this determination, please contact me at (202) 482-3226 or by email at JTHOMPSO@bis.doc.gov.

Sincerely,

James Thompson
Director,
Sensor and Aviation Division
Office of National Security and
Technology Transfer Controls

