

Directive Documents and ITAR Made Easy

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- What Prompted a Review of This Process?
- What is ITAR?
- What other Export Regulations Apply?
- How is sensitive data protected?
- What was the Initial Review Process?
- What types of Directive Documents contain restricted data?
- Analyzing the Sensitive Documents
- New Review Process
- Benefits
- Lessons Learned

What Prompted a Review of This Process?

- **The ITAR Review of Documents Occurs Once the Content is Finalized, Prior to Release**
- **The Quantity of Documents varies by monthly release**
- **Reviewers**
 - Specific training
 - Core Team each Month
 - Extra Reviewers During Peak Periods supplement the core team
- **One of the Outside reviewers found the process tedious and explored methods of improvement**

What is ITAR?

- **International Traffic in Arms Regulations (ITAR)**
 - Government regulations that control the export and import of defense-related articles and services on the United States Munitions List
 - Implements the provisions of the Arms Export Control Act
- Information required for the development, manufacturing, operation, etc., of defense articles

Goal is to safeguard US national security and further US foreign policy objectives

What other Export Regulations Apply?

- Export Administration Regulations (EAR)
- Contains the Commerce Control List (CCL) of regulated commercial items, including “dual-use” items that have commercial, military or proliferation applications.
- Broad array of commodities, software and technologies including,
 - Building materials
 - Circuit boards
 - Automotive parts
 - Blue prints
 - Design plans
 - Retail software packages
 - Technical information

Not Export Sensitive

- Information related to general scientific, mathematical or engineering principles that is commonly taught in schools and colleges
- Information that is in the public domain
 - MIL Standards
- General marketing information or basic system descriptions
- “Form, Fit and Function” Descriptive Information

**Not needed to safeguard US national security
and further US foreign policy objectives**

“EXPORT”

“Export” includes not only the shipment of products abroad, but also release of technical data to a foreign person which is deemed an export by its mere disclosure or transfer to a foreign person, *even if within U.S. borders.*

How is sensitive data protected?

- **Marked as “Export Sensitive”:**
This document (or software if applicable) contains data whose export/transfer/disclosure is restricted by U.S. law. Dissemination to non-U.S. persons whether in the United States or abroad requires an export license or other authorization.
- Screen displays when document is selected:

“WARNING - The document you are attempting to view may contain Technical Data within the definition of the International Traffic in Regulations (ITAR) and is subject to the export control laws of the U.S. Government. Transfer of this data by any means to a Foreign Person, whether in the United States or abroad, without an export license or other approval from the U.S. Department of State, is strictly prohibited.”

How is sensitive data protected? (continued)

- The “Filter” that permits access when an ITAR document is selected:

Raytheon

Simplified Sign On

Raytheon Login

Please enter your Raytheon Directory Services Employee Number and Password

Employee Number:

Password:

Secured By
Netegrity
SITEMINDER

Warning: After you login, you may see the message: "You are being redirected to a connection that is not secure." Please Click OK. This message appears when you leave SSO, which is encrypted, and go to the web site you requested, which is not encrypted.

Login Help

What is my employee number?
Your employee number is listed as part of your Raytheon Directory Services entry. If you are unsure of the number, please search for your entry in [Directory Services](#). Your employee number is listed in your entry.

What is my password?
Your password is your Raytheon Directory Services password. To change your password, please go to the [Directory Services Change My Password](#) self-service web site. You must have a valid email account in Directory Services, and answer your Security Questions correctly to have your password reset.

If you need further assistance to reset your password, please contact the Raytheon Help Desk at **1.877.844.4712** (international employees only call 1.469.995.2911).

The Corporate password reset process is located on the Enterprise Security Services web site at: http://security.it.ray.com/procedures/password_resets.html.

Last updated: March 24, 2006

Employee Database



Employee Profile

As of Date: 2009-10-27

Personal

Name: Ken Weinberg

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Eligible to access US export controlled data: Yes - Allowed

Export Control Awareness Training: Yes

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What was the Initial Review Process?

- Trained reviewers review each paragraph of each document to determine status
 - Not Export Restricted – Contains No Technical Data or Technical Data which is not sensitive
 - Export Restricted – Contains Technical Data which is Sensitive
- Review Expense must be Included in Release Costs
- Review time must be Included in Release Schedule
- Review must be thorough to ensure not a threat to national security

What types of Directive Documents contain restricted data?

- 237 Directive Documents – 2 are restricted (<1%)
- 361 Non-Directive Enablers – 27 are restricted (7%)
- Directive Documents tell “What” to do and do not tell “how” to design or manufacture
- Non-Directive Enablers are guidelines, templates, samples, etc., which often tell “how” to design or manufacture

Which Documents are Export Controlled?

- Purchased Parts Documentation
- Engineering Review Board Template
- Parts, Materials and Processes Control Plans
- Managing GIDEPs, General Alerts, Supplier Nonconforming Notices
- Built-In Test Checklist
- Prohibited Materials Program
- Separate Notes and Parts Listing
- Robust Design Guide
- Simulation Development
- Connector Saver Usage
- Onboard Regulator Power & Efficiency Calculations for Two Phase Buck Converter
- Current Sense Amplifier Design Guide
- Wilkinson Divider
- Rat Race Coupler
- Calculator for HW Design
- Transceiver Performance Worksheet for HW Analysis
- RFMW_SPW Worksheet for Transceiver HW Analysis
- RRFC Foundry Website/Design Rules
- Fastener Design Guide
- Structural Guidelines
- Cable Design Guidelines
- Packaging Module Design
- Multi-Layered Insulation Specification
- Connector Mating Interface Design
- Inspection of Planar Waveguides for High-Power Lasers
- Real-Time Laser Beam Analyzer
- X-Ray Fluorescence Equipment for Prohibited Materials Scanning

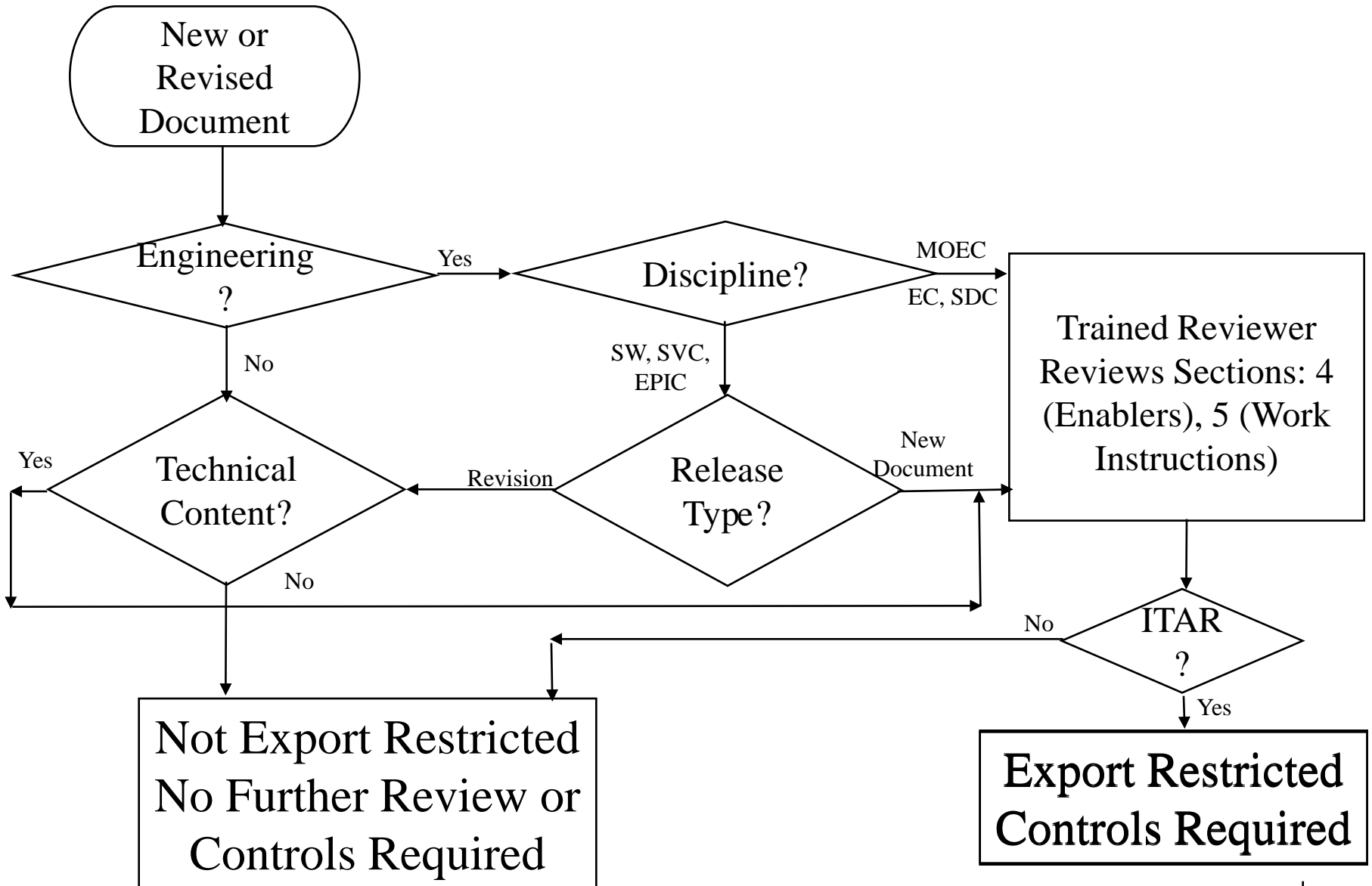
All Export Sensitive Documents are Technical and from Engineering Disciplines

New Review Process

- Documents that are free of technical content do not need a trained ITAR review
 - Developed Guidelines Regarding Technical Content
 - Author or Discipline Process Representative Certifies that there is no technical content in document
 - Used for disciplines which are not typically technical (e.g., Configuration Management) and have no history of ITAR sensitive documents
- What is Reviewed by Trained Reviewers
 - Directive Documents – Only sections 5 (Instruction)
 - Non-Directive Enablers - Only section 4 (Technical Content)
 - Author or Discipline Process Representative Certifies that there is no technical content in remaining sections

- Technical Content is technology associated with a product
 - Instructions to conformal coat electronics
 - Geometric Tolerance Guidelines for a specific item
 - How to measure timing of Image Processing Software
- Administrative data, Business Data, Instructions without the mention of product technology are not technical
 - Peer Review Process
 - Earned Value Calculations
 - Cost Estimation/ Cost Collection

New Review Process Flow



Benefits

- New Method Has Lower Cost
- New Method Has Shorter Schedule
- Little Risk of Release of Sensitive Material
 - Stored on internal servers
 - All non-marked material requires review before delivery outside of Raytheon

**Review is Still Thorough Enough to
Ensure no Threat to National Security**

Lessons Learned

- **Analysis of the Data of a “Working” Process Can Provide Significant Improvement**
- **“Outsiders” looking at a process can often recognize areas for improvement better than those intimately involved in the process.**

Questions ? ? ?