



# Global Watch®

THE NEWSLETTER OF THE INTERNATIONAL IMPORT-EXPORT INSTITUTE

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## IIIEI Certification Program Gains Momentum Globally

With the introduction of the Certified ITAR Professional® designation earlier this year, Dunlap-Stone University's International Import-Export Institute (IIIEI) saw an "immediate and incredible impact," said Dr. Donald Burton, IIIEI founder and President. "It was like connecting electricity to a pump," he continued. "All of the sudden enrollments in our training programs worldwide took off, not just the compliance certification training programs, but general certification training as well, say our partner schools and training organiza-

tions spread around the world."

The interest in IIIEI's UK, China, Australian, and Canadian export controls training courses has also seen a marked increase, said Dr. Burton. The reason for the increase in interest he says is governments worldwide are feeling the pressure to heighten export controls. Governments globally appreciate IIIEI Certification because its certifications are the global standard and the fact that it is a non-government organization, an impartial and unbiased third-party.

## China Imports Fall in June as Trade Surplus Shrinks

Courtesy Reuters News Service

By Zhou Xin and Alan Wheatley BEIJING, July 10

The rate of decline in Chinese imports slowed sharply as the government's massive infrastructure spending sucked in commodities and other goods from the rest of the world. Imports in June were 13.2 percent lower than a year earlier, compared with forecasts of a 20.4 percent decline and a 25.2 percent fall in May, the General Administration of Customs said. As a result, China's trade surplus shrank to \$8.25 billion, the lowest total since February and well below market forecasts of \$15.2 billion. "It's further evidence that domestic demand has snapped back," said David Cohen with Action Economics in Singapore. "It's one more indication of renewed momentum in the Chinese economy." It was the strongest import performance since November and reinforced the view that China is leading other major economies out of a deep downturn brought on by the global financial crisis. Exports fell by 21.4 percent, close to expectations and

an improvement on May's slide of 26.4 percent. "Imports performed better than exports, and this trend is likely to continue in coming months," said Zhang Zongxin, an economist with Northeast Securities in Shanghai. "China's domestic investment is very strong right now, helped by massive bank lending, and that means China needs more imports." Crude oil imports, for instance, were up 14 percent from a year earlier, while imports of copper hit an all-time high in June for the fifth month in a row. **HEADING FOR TRADE DEFICITS?** Beijing is implementing a 4 trillion yuan (\$585 billion) stimulus package over two years that is centred on spending on infrastructure such as roads and railways as well as public housing and the reconstruction of earthquake-stricken Sichuan. China's state-owned banks have complemented the pump-priming with a record burst of lending, which surged 7.37 trillion yuan in

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## GE India to Receive Express Lane Status for U.S.-Indian Trade

*The first designation for any company in India will cut red tape and increase flow of high-technology trade between the two countries*

U.S. Secretary of Commerce Gary Locke announced an important step forward in the strategic partnership between the United States and India during remarks to the U.S.-India Business

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## Notes from the President

### Value of IIEI Certifications

by *Dr. Donald N. Burton*



Why are the IIEI Certification training programs so popular with both governments and individuals? I hear this question from foreign dignitaries and from people everywhere. What they're really asking is: Is the certification worth having? Is it worth my hard work and effort to earn an IIEI Certification? The key word to examine here is "worth"—meaning value. The simple answer is its extremely valuable to both governments and to individuals, but the answer needs more explanation.

First of all it didn't happen overnight. It has taken nearly fifteen years to get to where it is today. Initially IIEI Certifications were accepted and perceived as valuable outside the U.S. but not by many within the U.S. Over time this has changed. But what has really changed?

From day one, IIEI Certification's programs and their requirements denoted a high level of proficiency and expertise. So difficult were the examinations that few could pass the tests. Of the various certifications the average pass rate is 62% the first time. The tests themselves have always been rigorous as demanded by the countless volunteers over the years who recommended the standards. You see we don't set the standards—industry does. We administer the knowledge requirements as recommended by experts from all over the world. As the world has evolved so have the requirements for the various certifications. One of the areas

that has changed the most is U.S. Export regulations and our certification training courses reflect each of those changes as they occur. So the value of the certifications is that they denote someone who has the proficiency and knowledge level of the particular area, such as UK export laws, sufficient to be deemed up-to-date and knowledge about the subject. That is the value of any certification—not just trade certification. It is an independent, third-party validation of the knowledge and expertise of the certification holder. Now, to get back to the issue about IIEI Certification's value.

The value of IIEI Certification has been voted on and approved by those it certifies every day as governments and individuals use its services. Over one thousand companies in over 90 countries and nearly all of the top 100 U.S. aerospace and defense companies routinely have employees enroll in our courses and sit for our various certification exams. Most U.S. Government regulatory agencies, including State and Commerce Department, have had employees enroll in courses. Thousands more annually learn from our partners worldwide. This is the testament of the value of IIEI Certification. You see, it isn't what we say about the value of certification that matters. It is what the people we serve say, and what they do. Thank you for strong, continued support. Every day we strive hard to live up to your trust. Take care.

# Global Financial Annual Report:

29 June 2009

Rescue, recovery, reform – the narrow path ahead

In its *79th Annual Report*, the Bank for International Settlements (BIS) looks at the narrow path ahead leading out of the financial crisis. The Report underlines the need to focus clearly on the medium term and on sustainability when designing both macroeconomic and financial policy responses.

The crisis had both macroeconomic and microeconomic causes: large global imbalances; a protracted period of low real interest rates; distorted incentives; and an underappreciation of risk. There were market failures, and regulation failed to prevent the build-up of excessive leverage.

In September and October 2008, the financial crisis intensified, forcing monetary, fiscal and regulatory authorities both to expand their fight to restore the health of the financial system and to counter the threats to the real economy. The scale and scope of the monetary and fiscal policy measures are unprecedented.

Nevertheless, the balance sheets of many financial institutions have still not been repaired. Further steps are needed to address this. A healthy financial system is a precondition for the effectiveness of expansionary policies and for stable long-run real growth. It is “essential that authorities ... repair

the financial system”, notes the Annual Report, and “persevere until the job is done”. And they should resist financial protectionism, sometimes an unintended consequence of national support for the financial sector, as this would moderate growth and development.

Implementing the rescue is a complex task that is fraught with risks. Policies should aid, not hinder, orderly adjustment. They need to strike a balance between short-term stimulus and well articulated exit strategies that ensure long-term sustainability. They need to allow the financial sector to shrink as borrowers reduce their leverage. And they need to promote a shift in production patterns away from export- and leverage-led growth models towards more balanced ones.

Governments and the private sector have to work together to build a more resilient financial system. Addressing the broad failures revealed by the crisis means that systemic risk in all its guises must be identified and mitigated, adopting a macroprudential perspective – a core theme of the BIS’s work for many years. Guillermo Ortiz, Chairman of the BIS Board of Directors, noted that “the work will have to be coordinated internationally across a wide range

of countries. In particular, institutions with expertise in the field – including the Financial Stability Board and standard-setting committees – will need to play a leading role”.

The BIS Annual Report argues that financial instruments, markets and institutions all require reform if a truly robust system is to emerge. For instruments, it means a mechanism that rates their safety, limits their availability and provides warnings about their suitability and risks. For markets, it means encouraging trading and clearing through central counterparties and exchanges. For institutions, it means the comprehensive application of enhanced prudential standards that integrate a system-wide perspective. Above all, regulators and supervisors must adopt a macroprudential orientation. By focusing on the stability of the system as a whole, as much as on the viability of individual institutions, it would reduce the probability of joint failures that arise from common exposures and at the same time moderate the procyclicality inherent in the financial system. Speaking recently, BIS General Manager Jaime Caruana stressed that “there are several projects under way to make the macroprudential approach operational, building on the new-found international consensus supporting it. The BIS is actively involved in all of these initiatives”.

But better regulation is not enough. Macroeconomic policies can and must play a role in promoting financial stability. For monetary policy, this means taking

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## BIS Update

Bureau of Industry and Security

### BIS Amends EAR to Address Security and Competitiveness Issues with Thermal Imaging Cameras

**WASHINGTON, D.C.** - The U.S. Department of Commerce's Bureau of Industry and Security (BIS) published an amendment to the Export Administration Regulations (EAR) that recalibrates controls on uncooled thermal imaging cameras to address security and competitiveness issues. These cameras have commercial and military applications, including firefighting, predictive/preventive maintenance, medical, perimeter monitoring, and targeting.

"This revision of the EAR will allow U.S. camera companies to more effectively compete in their major markets with foreign manufacturers while ensuring appropriate U.S. government review and oversight over commercial cameras used for military purposes," said Matthew S. Borman, Acting Assistant Secretary for Export Administration.

Specifically, the EAR amendment:

- recognizes the availability of foreign commercial cameras and streamlines controls on exports of certain levels of commercial uncooled thermal imaging cameras to destinations in the European Union and certain other Wassenaar members;

*BIS Amends - Continued on page 10*

### New York Bank Settles Allegations of Antiboycott Violations

The U.S. Department of Commerce (DOC) announced that Gulf International Bank (New York), the U.S. branch of Gulf International Bank, headquartered in Bahrain, has agreed to pay a civil penalty of \$49,850 to settle allegations that it violated the antiboycott provisions of the Export Administration Regulations (EAR).

"The DOC will continue to aggressively enforce its regulations prohibiting U.S. companies from taking any action in support of restrictive trade practices or unsanctioned boycotts," Kevin Delli-Colli, Acting Assistant Secretary of Commerce for Export Enforcement, said.

"I encourage any company with boycott issues to review the Antiboycott Compliance Module of BIS's online Training Room at [www.bis.doc.gov/eminarsandtraining/seminar-training.htm](http://www.bis.doc.gov/eminarsandtraining/seminar-training.htm) and to contact the OAC Advice Line with specific questions," he added.

The BIS, through its Office of Antiboycott Compliance, alleged that, on eight occasions during the

*Bank Settles - Continued on page 11*

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### Defendant Sentenced in Conspiracy to Export Military Aircraft Parts to Iran

In an action showing how integrated U.S. export enforcement has become, and how U.S. agencies are working together, Jeffrey H. Sloman, Acting United States Attorney for the Southern District of Florida, David Kris, Assistant Attorney General for National Security, Michael Johnson, Special Agent in Charge, U.S. Department of Commerce, Office of Export Enforcement, Anthony V. Mangione, Special Agent in Charge, U.S. Immigration and Customs Enforcement, Office of Investigations, and Amie R. Tanchak, Resident Agent in Charge, U.S. Department of Defense, Defense Criminal Investigative Service, announced that defendant Traian Bujduveanu was sentenced in Miami federal court for his role in a conspiracy to illegally export military and dual-use aircraft parts to Iran. Bujduveanu's co-defendant, Hassan Keshari, and his corporation, KeshAir International, were sentenced in May 2009.

U. S. District Court Judge Patricia Seitz sentenced Bujduveanu to thirty-five (35) months' imprisonment, followed by three (3) years of supervised release. Bujduveanu pled guilty on April 2, 2009, to Count 1 of the Indictment, which charged conspiracy to export and cause the export of goods from the U.S. to the Islamic Republic of Iran, in violation of the Embargo imposed upon that country by the

*Iran - Continued on page 13*

# DDTC Update

Directorate of Defense Trade Controls

## Air Shunt Instruments, Inc.: \$100,000 Settlement

The U.S. Department of State and Air Shunt Instruments, Inc., (Air Shunt) have reached an agreement to resolve violations of the Arms Export Control Act (AECA) and International Traffic in Arms Regulations (ITAR) committed by Air Shunt between September 2003 and January 2004.

Under the Consent Agreement signed this week to settle the case, Air Shunt agreed to pay a civil penalty of \$100,000, of which \$70,000 will be suspended on the condition that they have already applied that amount to self-initiated, pre-Consent Agreement remedial compliance measures; and the remaining \$30,000 will be suspended on the condition that they will apply this amount to Consent Agreement-authorized remedial compliance measures. Additionally, Air Shunt will institute enhanced compliance measures, and will have two independent audits of its compliance program conducted prior to the termination of the Consent Agreement.

Source: [www.state.gov/r/pa/prs/ps/2009/july/125844.htm](http://www.state.gov/r/pa/prs/ps/2009/july/125844.htm)

## Looking for a Promotion or a New Job?

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## DDTC Web Notice: Electronic Agreement Submissions

Beginning July 6<sup>th</sup>, 2009, DDTC will permit selected U.S. applicants to submit agreements and their amendments electronically via the D-Trade 2 application. This electronic system will employ the D-Trade 2 Production application as the means for submitting, reviewing, and approving agreement proposals. It will incorporate the DSP-5 tool as the primary instrument (or "vehicle") for transitioning agreements and their respective amendments from one phase of the adjudication process to the next. This process will negate the need for DDTC to issue a separate authorization letter upon approval of a case.

Dependent upon the success of pilot electronic agreement submissions, DDTC anticipates making the submission of electronic agreement applications available to all U.S. applicants on or about October 1<sup>st</sup>, 2009, followed by making the submission of electronic agreements applications mandatory for all applicants in Spring 2010.

Due to the unique requirements and formats associated with Agreement processing, DDTC guidelines governing the completion of the DSP-5 form have been modified to allow for its use for this express purpose. As U.S. applicants are invited to participate in electronic agreements, they will be provided specific details of these changes and the process for submitting agreements electronically. Once DDTC is ready to open electronic submissions to all U.S. appli-

DDTC Web Notice - Continued on page 11

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## DTrade 2 Minimum System Requirements

The DTrade 2 system requires the following computer system requirements and Internet access.

### Software:

- PureEdge TM Forms Viewer (Version 6.5) or Third Party Batch software (OCR Ease, MSR/ eCustoms Visual License, or other custom application)
- Adobe® Acrobat® 7 Standard
- ACES Business Representative Digital Certificate
- Microsoft Internet Explorer Version 5.01 or greater (128-bit Encryption and ActiveX enabled)
- Java Runtime Environment (JRE) Version 1.5.0 06 or greater
- Microsoft® Office® XP and earlier

### Hardware:

- Intel® Pentium® III processor or equivalent
- Microsoft® Windows® 2000 (SP4); Windows Server® 2003 (SP1); XP Professional (SP2) or Vista™ Operating System
- 512MB of RAM
- 860MB of available hard-disk space

### Desktop Settings:

- ACES Digital Certificate inclusion in Internet Explorer Trusted Identities

Source: [www.pmdtcc.state.gov/](http://www.pmdtcc.state.gov/)



## In Compliance....

### Security versus the Greater Society!

by Robert Perkins, Ph.D.

On September 11, 2001, global supply chain compliance and security changed. With the terrorist attack on the United States requiring both government and trade's increased commitment and expense to safeguard the supply chain. In today's supply chain, the United States government and trade are mandated by legislation to respectively enforce and comply with statutory and regulatory compliance programs. For security programs, the government is tasked with the responsibility to promulgate and manage voluntary certification programs. In partnership, the trade is encouraged to participate in the certification programs to improve the security of their supply chain, and, in exchange, to achieve a preferential risk assessment status. Therefore, the need for an increase in commitment requires a commensurate level of increased cost, however; the challenge to the government and trade is to balance the two while maintaining a secure and facilitative supply chain.

Unlike security programs that are considered to be voluntary or discretionary, compliance programs are mandatory. The government-to-trade relationship for compliance programs is not necessarily coupled by partnership. Governmental mandates are top-down. According to a study conducted by the World Trade Organization (WTO), compliance

programs are more hierarchical, driving direction with little recourse for organizational customization. Therefore, compliance programs intended to safeguard the supply chain require the government to enforce compliance programs while trade's responsibilities are joined to program integration and compliance with little opportunity for customization. Government agencies commonly enforce compliance programs through the analysis and evaluation of the trade's compliance performance measurements. The analysis and evaluation process is conducted either by transaction or supply chain trends to track the trade's level of compliance; therefore, the financial investment by trade generally correlates to the level of compliance standards. In addition, based on satisfactory or unsatisfactory results of a trade entity meeting those standards, governmental agencies may offer certain transparencies to allow greater facilitation for stronger performing trade entities or seek remedies from those who demonstrate unsatisfactory compliance levels.

Conversely, the data from United States government studies indicate that security programs are more bottom-up, driven by the trade's internal goals and investment strategies. Some of the global programs that exist are: (1)

the United States Customs-Trade Partnership Against Terrorism (C-TPAT), (2) the Canadian Partners in Protection (PIP), and (3) the European Authorized Economic Operators (AEO). These security initiatives are considered to be voluntary programs developed by the various governments to guide the private sector when implementing security strategies and infrastructure. Therefore, the participant has greater flexibility with the ability for election to customize the security program to facilitate the specificities of their supply chain.

Normally, a security program offers a framework for facility management, cargo management, human resource management, information and technology management, and business security networks and overall company managements systems. In most cases, the impetus for the trade to participate in a voluntary security program is the anticipated benefits that are

*In-Compliance - Continued on page 7*

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In-Compliance - Continued from page 6

commensurate with the investment of the organization's capital resources. Therefore, an organization's decision to participate may depend on many factors such as a direct correlation between transparency and predictability gained from the investment of capital resources.

However, collectively for both the government and trade, new programs introduce multiple challenges, complexities, and the need for capital investment which translates to increased costs. A significant challenge for the trade is to balance the investment in capital resources for security programs with the perceived benefits. When does the investment of capital resources in voluntary security programs become a diminishing return to safeguard the supply chain? When does increased organizational investment offer no tangible differences to mitigate risk? What happens if an egregious event occurs and the preferential status earned by trade's demonstrated compliance and participation in security programs is permanently terminated or temporarily suspended for a significant period of time?

The challenges of balancing security and mitigating risk with the costs of corporate resources can not be evaluated from the single dimension of financial investment. Corporate citizenship is just as important and maybe even more so if an organization evaluates the potentiality of risk to its brand. Let's assume an organization's supply chain is breached and the result is the introduction of a 'dirty bomb' into the United States. Think of the negative publicity and the ruinous results that could even lead to an organization's demise. Therefore, the

need to evaluate participation in and the decision to invest in a voluntary security program ought not to be envisioned as one dimensional (financial). The thinking by an organization's leadership has to consider multiple factors to include an organization's commitment to corporate citizenship or an organization's awareness of how a supply chain security breach could endanger an organization's brand. An organization's leadership faces the challenge to examine and verify what factors are critical to manage its supply chain security programs. Therefore, irrespective of the tangible or traceable return on its financial investment, organizational leadership has the fiduciary responsibility to act in the best interest of its owners (stockholders if public, owners if private) while exercising due diligence to protect the world economy and global civilization.

#### About the Author

Dr. Robert Perkins has more than 34 years experience in international trade and is a licensed customs broker. Dr. Perkins is currently a Senior International Trade Advisor for a Washington, DC consulting firm and is an adjunct faculty member for Dunlap-Stone University.

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### BIS to Add New Edits in AES on ECCNs, Special Comprehensive Licenses, and Certain License Exceptions

United States Principal Parties in Interest (USPPIs) and their authorized filing agents (AES filers) are reminded that the AES record containing the Electronic Export Information (EEI) is an export control record under § 758.1(f) of the Export Administration Regulations (EAR). Furthermore, the AES record represents whether the export authorized under the terms and conditions of a license, license exception or no license required is true, accurate and complete.

Effective October 1, 2009, BIS is tightening up the edits on the EEI to improve statistics and to ensure that AES filers are correctly certifying the use of a license or license exception authorization or no license required designation. AES filers must prepare for these edits, as described below to prevent the return of fatal errors from AES.

- The Export Control Classification Number (ECCN), when reported in AES, must be a valid 5-position ECCN as listed on the Commerce Control List.

See Supplement 1 to Part 774 of the EAR for a complete list of valid ECCNs and their descriptions.

[www.access.gpo.gov/bis/ear/ear\\_data.html](http://www.access.gpo.gov/bis/ear/ear_data.html)

- The Special Comprehensive License (SCL) number re-



*Country Profile*  
*New Zealand*

**New Zealand**, a parliamentary democracy, is an island country in the south-western Pacific Ocean comprising two main landmasses (commonly called the North Island and the South Island), and numerous smaller islands.

With a temperate climate with sharp regional contrasts, New Zealand is notable for its geographic isolation: it is situated about 2000 km (1250 miles) southeast of Australia across the Tasman Sea, and its closest neighbours to the north are New Caledonia, Fiji and Tonga. The population of New Zealand is mostly of European descent; the indigenous Māori are the largest minority. Asians and non-Māori Polynesians are also significant minority groups, especially in urban areas. The most commonly spoken language is English.

New Zealand is a developed country that ranks highly in international comparisons on human development, quality of life, life expectancy, literacy, public education, peace, prosperity, economic freedom, ease of doing business, lack of corruption, press freedom, and the protection of civil liberties and political

rights. Its cities also consistently rank among the world's most liveable.

The country has a relatively high standard of living with an estimated GDP per capita of \$27,017 (2008), comparable to Southern Europe. It largely escaped the early 2000s recession that affected most other Western countries. However GDP fell in 2008. The service sector is the largest sector in the economy (68.8% of GDP), followed by manufacturing and construction (26.9% of GDP) and the farming/raw materials extraction (4.3% of GDP). New Zealand is a country heavily dependent on free trade, particularly in agricultural products. Exports account for around 24% of its output. This makes New Zealand particularly vulnerable to international commodity prices and global economic slowdowns. The current government's economic objectives are centred on pursuing free-trade agreements and building a "knowledge economy". On 7 April 2008, New Zealand and China signed the New Zealand China Free Trade Agreement, the first such

*New Zealand*  
*at a Glance*

- GDP** – official exchange rate: \$135.7 billion (2008 est.)
- GDP** - real growth rate: 0.2% (2008 est.)
- GDP** - per capita (PPP): \$27,900 (2008 est.)
- Inflation Rate:** 4.3% (2008 est.)
- Labor Force:** 2.26 million (2008 est.)
- Unemployment:** 4% (2008 est.)
- Population:** 4,213,418 (July 2009 est.)
- Exports:** \$29.53 billion (2008 est.)
- Exports** - Commodities: dairy products, meat, wood and wood products, fish, machinery
- Exports** - Markets: Australia 22%, US 11.5%, Japan 9.2%, China 5.3%, UK 4.6% (2007)
- Imports:** \$31.11 billion f.o.b. (2008 est.)
- Import** - Commodities: machinery and equipment, vehicles and aircraft, petroleum, electronics, textiles, plastics
- Import** - Markets: Australia 20.7%, China 13.4%, US 9.7%, Japan 9.5%, Singapore 4.9%, Germany 4.7% (2007)
- Foreign Exchange Rate:** New Zealand dollars (NZD) per US dollar - 1.4151 (2008 est.)
- Internet Users:** 3.36 million (2007)
- Internet Hosts:** 1.72 million (2008)

Source: CIA World Fact Book

agreement China has signed with a developed country. Ongoing economic challenges for New Zealand include a current account deficit of 7.9% of GDP, slow development of non-commodity exports and tepid growth of labour productivity. New Zealand has experienced a series of "brain drains" since the 1970s, as educated youth leaving permanently for Australia, Britain or the United States.



**Financial Report** - Continued from page 3

better account of asset prices and credit booms; for fiscal policy, it means putting a premium on medium-term fiscal discipline and long-term sustainability.

The 79th Annual Report was presented at the Bank's [Annual General Meeting](#), held in Basel, Switzerland, and chaired by Guillermo Ortiz. The Bank reported a balance sheet total of SDR 255 billion (USD 381 billion) at end-March 2009, a decrease of SDR 56 billion over the past year. Net profit was 18% lower than for the previous financial year, amounting to SDR 446 million (USD 666 million). Currency deposits by customers represent some 4% of the world's total foreign exchange reserves.

The BIS's 55 shareholding central banks will receive a dividend of SDR 265 per share, unchanged from the previous financial year.

About the Bank of International Settlements

The Bank for International Settlements (BIS) is an international organization which fosters international monetary and financial

cooperation and serves as a bank for central banks.

The BIS fulfils this mandate by acting as:

- a forum to promote discussion and policy analysis among central banks and within the international financial community
- a centre for economic and monetary research
- a prime counterparty for central banks in their financial transactions
- agent or trustee in connection with international financial operations

The head office is in Basel, Switzerland and there are two representative offices: in the Hong Kong Special Administrative Region of the People's Republic of China and in Mexico City.

Established on 17 May 1930, the BIS is the world's oldest international financial organization.

As its customers are central banks and international organizations, the BIS does not accept deposits from, or provide financial services to, private individuals or corporate entities.

Source: [/www.bis.org/press/p090629.htm](http://www.bis.org/press/p090629.htm)

**China** - Continued from page 1

the first six months, almost 25 per cent of annual GDP. Even so, Premier Wen Jiabao struck a cautious note on Friday, warning that an improvement in the economy did not mean that China was through its difficulties. "The economic recovery is not on a solid foundation, and the negative impacts from the international crisis have not eased," Wen said in a summary of recent meetings with economists and industrial groups. His comments were posted on the government's main website, [www.gov.cn](http://www.gov.cn). With domestic demand likely to accelerate further, economists at Goldman Sachs said they expected a significant rise in imports in coming months. Indeed, economists Yu Song and Helen Qiao said there was a real chance that China might start reporting trade deficits in the first half of next year, something that has not occurred since 2004. That would defuse criticism, especially loud in the United States, that China is deliberately holding down the exchange rate of the yuan to favour exporters. Beijing has more or less frozen its currency against the dollar for the past year. Zhang with Northeast Securities said he expected no change at least for the rest of 2009 and early 2010. "One thing's for sure — China won't let the currency appreciate as long as exports remain weak."

## Free Trade Crucial to Economic Recovery

UN Secretary-General Ban Ki-Moon, said that "free and fair trade" was crucial to stimulating economic recovery and spurring growth.

Addressing the opening session of the 15th Non-Aligned Movement (NAM) summit in Sharm el Sheikh, Egypt, with more than 50 heads of state from the developing countries in attendance, Ban said developing nations were suffering most from the global economic crisis which was affecting millions of people living in the NAM member states

The secretary-general also warned that "the impact of the economic crisis is likely to be even graver

in the future".

He noted "there are worrying signs of rising economic nationalism, industrial subsidies, tariff increases and other protectionist measures that will only undermine global economic growth".

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- establishes a mechanism for streamlining controls on higher-level, civil consumer-ready commercial uncooled thermal imaging cameras;
- establishes a process for streamlining controls on commercial uncooled thermal imaging cameras to be incorporated into civil products by civil integrators; and
- controls the reexport of foreign-made military products incorporating U.S. commercial uncooled thermal imaging cameras.

Federal Register / Vol. 74, No. 98

Source: [http://www.bis.doc.gov/news/2009/bis\\_press05272009.htm](http://www.bis.doc.gov/news/2009/bis_press05272009.htm)

**The SNAP-R Webinar Video Available online!**

BIS's SNAP-R is available at no cost to the exporting community. With SNAP-R you:

- Have the ability to attach supporting documents to online export license application submissions by uploading files through the web interface;
- Have enhanced system security and improved authentication;
- Email notification capability to support exporter and BIS staff correspondence, acknowledgements, and validations;
- Have the capability to copy and re-use work item and supporting documents; and
- Have the capability to share work items within the same company (based on user rights management).

SNAP-R gives you the ability to:

- Submit export and re-export applications, and commodity classification requests via the Internet

SNAP-R - Continued on page 13

U.S. and in violation of the International Emergency Economic Powers Act, Title 50, United States Code, 1705(a), and to export and cause to be exported defense articles, in violation of the Arms Export Control Act, Title 22, United States Code, Section 2778(b), all in violation of Title 18, United States Code, Section 371.

As part of his plea, Bujduveanu, a Romanian national and naturalized U.S. citizen, admitted that he used his Plantation, FL, corporation, Orion Aviation, to sell aircraft parts to Keshari for purchasers in Iran and exported the aircraft parts to Iran by way of freight forwarders in Dubai, United Arab Emirates. Among the aircraft parts illegally exported to Iran through the conspiracy were parts designed exclusively for the F-14 Fighter Jet, the Cobra AH-1 Attack Helicopter, and the CH-53A Military Helicopter. All of these aircraft are part of the Iranian military fleet, while the F-14 is known to be used exclusively by the Iranian military. Moreover, all of the parts supplied

by Bujduveanu as part of the conspiracy are manufactured in the U.S., are designed exclusively for military use, and have been designated by the U.S. Department of State as "defense articles" on the U.S. Munitions List, thus requiring registration and licensing with the Department of State, Directorate of Defense Trade Controls. Neither Bujduveanu nor his co-defendants are registered or had the required licenses to ship defense articles to Iran.

According to the Indictment and statements and documents filed with the court, Bujduveanu received orders by email from Keshari requesting specific aircraft parts for buyers in Iran. Bujduveanu then provided quotes, usually by e-mail, to Keshari. After the receipt of payment for the parts from Keshari, Bujduveanu then the parts to a company in Dubai through the use of false or misleading shipping document. From Dubai, the parts were then shipped on to the purchasers in Iran.

Bujduveanu has been in federal custody since his arrest in June 2008.

Source: <http://www.bis.doc.gov>

**Volunteers Needed**

Want to be a member of IIEI's Certification Advisors and help IIEI set industry standards?

Visit [www.industrycertification.org](http://www.industrycertification.org)

Visit [www.usexportcompliance.com](http://www.usexportcompliance.com)



**ALL** of the top **50** U.S. aerospace and defense companies have enrolled employees in courses leading to industry certification.

**Bank Settles - Continued from page 4**

years 2002 through 2004, the Bank, in connection with transactions involving the sale and transfer of goods from the United States to Syria, furnished prohibited information about another person's business relationship with a company known or believed to be restricted from having any business relationship with Syria or in another boycotting country.

BIS also alleged that the Bank, on seventeen occasions during the same time frame, failed to report to the DOC its receipt of a request to engage in a restrictive trade practice or boycott and, on one occasion, failed to maintain records, as required by the EAR

**Source:** [www.bis.doc.gov/news/2009/bis\\_press0520\\_2009.htm](http://www.bis.doc.gov/news/2009/bis_press0520_2009.htm)

**DDTC Web Notice - Continued from page 5**

cants, the current agreements guidelines will be updated throughout to integrate the electronic submission information.

Additionally, participating U.S. applicants should note DDTC will continue to accept paper submissions until further notice.

While the types of information being supplied in the various blocks of the DSP-5 differ from that which is required for submitting individual licenses, the form has not been altered in any significant manner. However, DDTC recommends participating U.S. applicants download the most recent schema from our Production External Web site prior to submitting their first electronic agreement. Applicants should refer to the following URL:

<https://dt2.pmddtc.state.gov/dtrade/CertificateLogin>

**AEC Changes - Continued from page 7**

ported in AES under license type C31 must be a BIS approved SCL.

- License exceptions LVS (C35), GBS(C36), CIV(C37), and TSR(C38) must designate an eligible ECCN and country. See Part 740 (License Exceptions) and Supplement 1 to Part 774 (Commerce Control List)

[www.access.gpo.gov/bis/ear/pdf/740spir.pdf](http://www.access.gpo.gov/bis/ear/pdf/740spir.pdf) and

[www.access.gpo.gov/bis/ear/ear\\_data.html](http://www.access.gpo.gov/bis/ear/ear_data.html)

- In accordance with the EAR § 740.17, License Exception ENC(C50) must only be used with ECCNs 5A002, 5B002, 5D002 and 5E002.

[www.access.gpo.gov/bis/ear/pdf/740.pdf](http://www.access.gpo.gov/bis/ear/pdf/740.pdf)

Please note that by using a License Exception, you are certifying that the terms, provisions and conditions for the use of the License Exception described in the EAR have been met. See Part 740 of the EAR at [www.access.gpo.gov/bis/ear/pdf/740.pdf](http://www.access.gpo.gov/bis/ear/pdf/740.pdf).

If you are unable to resolve fatal errors related to the above and require regulatory guidance from BIS, please contact its Office of Exporter Services at one of the following locations.

**Source:** [www.bis.doc.gov/news/2009/bis\\_to\\_add\\_new\\_aes\\_edits\\_on\\_eccns.pdf](http://www.bis.doc.gov/news/2009/bis_to_add_new_aes_edits_on_eccns.pdf)

Certification Examination First-Time Pass Rates*	
CUSECO®	62%
CE®	78%
CITLS®	84%
CITMS®	78%
CITP®	56%
CITM®	68%

\*The most popular programs 2008-09

**New World Countries create New Wine Alliance**

Five competing New World countries and regions have joined forces to create a new alliance, in a world first for the wine industry.

Argentina, California, Chile, New Zealand and South Africa have launched the New World Wine Alliance, which will collaborate at ProWein 2010 in Germany to present a combined show.

The unusual step of competing countries launching a unified marketing front is aimed at giving the alliance "increased momentum" in the marketplace, said the alliance.

The five members have continued to grow exports despite the global credit crisis and believe that by working together they stand a better chance of competing against EU countries, which are supported by subsidies for marketing initiatives.

An alliance spokesman said: "Although we remain competitors, we believe the potential exists to further advance the New World's share of the global wine market by sharing best practice. We have already benefitted from each other enormously by exchanging viticultural and cellar research as well as innovations in packaging, marketing and logistics."

The alliance said it would seek to build trade through aggressive branding, by demystifying wine and thus attracting new consumers; by playing up regional strengths; focusing on technical, packaging and marketing innovation and focusing on a sustainable message.

Courtesy Harper's wine & Spirit [www.harpers.co.uk](http://www.harpers.co.uk)



## IIEI and World Trade Centers Celebrate 10<sup>th</sup> Anniversary of Partnership

As part of our long standing partnership with the World Trade Center University, all World Trade Center (WTC) employees throughout the world, regardless of country or WTC, receive a WTC-IIEI Scholarship that results in a 10% discount on all online courses offered by Dunlap-Stone University (DSU). The WTC-IIEI Scholarship can also be used by WTC employees who want to enroll in DSU's accredited world-class Bachelor of Science in International Trade Management degree program. DSU accepts equivalent transfer credits from schools throughout the world. Come earn your U.S. Nationally accredited degree with the premiere online university that serves the interna-

tional trade industry.

In addition, all World Trade Centers are eligible to become Approved Providers of the Certified Exporter® training program at no cost to the center. To find out more about this popular program, contact Brice Macartney at IIEI for complete details at (800) 474-8013 (U.S. or Canada) or outside the U.S. 1+602-648-5750 or email him at:

[bmacartney@dunlap-stone.edu](mailto:bmacartney@dunlap-stone.edu)

If you are interested in pursuing your Bachelor degree, please contact Lisa Fritsch. Email her at:

[lfritsch@dunlap-stone.edu](mailto:lfritsch@dunlap-stone.edu)

The new school year begins soon, enroll today to reserve your place in our online classes and programs.

### “How DSU Course Waivers Work”

During the admissions process, DSU's administrative team reviews the official transcripts submitted and tallies up transfer credit to satisfy the general education portion of the degree program. But what happens when you've maximized your transfer credit, and you still have courses available? Courses that seem similar in nature and scope to the courses required of the major component?

Many students are awarded “course waivers,” and wonder what they are and why they are important to their degree completion track. A course waiver takes the place of a required course within your major. So let's say you've taken an accounting class that is the equivalent to the ac-

counting class required for your degree. If it is approved as a waiver, you no longer have to take the accounting class!

But a word of caution: waivers remove the required course, they do not award credit. That means you cannot count the waiver towards the total credits required for graduation, or that the “excused” course will transfer to another institution.

When you are awarded a course waiver, it allows you to transfer in additional credits from other schools, training courses, or work experience to count towards the 120 credits you need to graduate. It also allows students to take additional courses at DSU that they find interesting (ie: customs brokers prep or terrorism), rather than repeating an accounting class which they've already completed elsewhere.

U.S. - India - Continued from page 1

Council's 34th Anniversary “Synergies Summit.”

General Electric India (GE India) has been tapped as the first Indian company to qualify as a validated end-user (VEU) in India, allowing the company to enter a pre-approved, export express lane as a trusted end user.

After an extensive background review, the VEU designation will allow GE India to receive certain controlled items from the United States, including civilian aircraft technology and explosive detection equipment without an individual license, cutting red tape and making the flow of trade more efficient between the countries.

That the VEU program was opened for India is an indication of the increased importance of the U.S.-India bilateral and commercial relationship.

“This is an important step in enabling a more rapid and efficient flow of sensitive technology between India and the United States,” Locke said. “It also is a significant effort to build trust between the United States and India. We're looking forward to reciprocal actions from our partner.”

The program is administered by the BIS and implemented by an interagency committee consisting of representatives from the DOC, State, Defense, Energy and, when appropriate, the Treasury.

GE India will become eligible as a validated end-user later this month after the regulation is published in the *Federal Register*. Secretary Locke also encouraged additional Indian firms to take advantage of the VEU program.

Source: <http://www.bis.doc.gov>



## Welcome to MyCAA!

### Spouse Career Advancement Accounts

The Department of Defense is expanding the Military Spouse Career Advancement Accounts — MyCAA — for U.S. military spouses of active duty and activated Guard and Reserve service members worldwide. Still in pre-rollout mode as of July 1, 2009. MyCAA is currently completing an extensive testing period with the help of volunteer spouses, schools and other payees. In mid May, MyCAA will officially open its doors for eligible military spouses worldwide to receive up to \$6,000 of financial assistance to help pay for licenses, certifications and education in high growth, high demand portable career fields.

### Military Spouse Career Advancement Account (MyCAA) Details

MyCAA provides up to \$6,000 of financial assistance for eligible spouses directly to participating schools or other programs. If they are already listed in the MyCAA system, a spouse and his/her school or other program are ready to proceed with their request for financial assistance. If not, the military spouse needs to click “Can’t Find School” on the MyCAA website to request that his/her school or other program be added. MyCAA financial assistance will pay for expenses such as post-secondary education and training, tuition, licensing, and credentialing fees. It does not pay

for computers, school application fees, graduation fees, student activity cards, child care, parking, transportation, medical services or testing fees.

### Who can help spouses develop a MyCAA Career Plan and explain how MyCAA financial assistance will be provided?

- o Check back to [www.MilitaryOneSource.com/MyCAA](http://www.MilitaryOneSource.com/MyCAA) regularly to find out the exact MyCAA launch date.
- o In the meantime, keep exploring your Portable Career options and working on your Career Plan with your school or other program counselor.
- o Once MyCAA is launched, call a Military OneSource Career/Education Consultant (1-800-342-9647) for an appointment. The MOS Consultant can answer questions you might have and provide assistance as you explore career fields of interest, job markets and salary ranges, choose a relevant course of study from a recognized school or program, learn more about the licensing and certifications necessary to meet your Career Goal, and complete your Career Plan.

<http://caa.milspouse.org/>

### DSU Founder Serves on DETC Standards Subcommittee

Dr. Donald Burton, Dunlap-Stone University’s President and founder has been selected by the Accrediting Commission of the Distance Education Training Council, DSU’s accrediting organization, to serve on the Research and Educational Standards Subcommittee, which is a subcommittee of the DETC Standards Committee, for the 2009-2010 Council year.

SNAP-R - Continued from page 10

in a secure environment.

- Receive same day acknowledgment of your submission.
- Obtain online validations (e.g. electronic facsimile of export license) from BIS.

For complete requirements, including system requirements, visit the BIS web site at:

[www.bis.doc.gov/snap/index.htm](http://www.bis.doc.gov/snap/index.htm)

### ITAR End of Course Survey

(permission to share granted)

*“This is my second online class with IIEI and I love it. The instructors have exceeded my expectations in knowledge and practical experience. I find the online environment to be flexible, easy to navigate, and much more conducive to my success than the traditional classroom setting. This is definitely the way to go if you have a very busy and demanding life.”*

Debbie W.



**July and August 2009  
Class Start Dates**

**Associates of Arts Degree**

Our College of Arts and Letters is pleased to announce it is accepting applicants into its two Associates degrees: our Associates of Arts (AA) in Business and our AA -General Transfer Degree. Call and speak with an Enrollment Advisor about the requirements. Find out how many of your existing college credits can transfer into these degrees and how quickly you can graduate. Discover how compliance certification courses can help you fill your elective requirements. (800) 474-8013



**DSU's Updated Mission**

As of July 7, 2009, the Board of Directors of Dunlap-Stone University has approved changes to the mission of the University. Our mission is:

*Excellence, honor and distinction are the hallmarks of the educational experience at Dunlap-Stone University as we strive to bring adult education to those normally considered to distant or remote to receive quality higher education. A variety of professionally significant degrees and programs, centered in business, social sciences and the humanities, provide a rich educational experience and solid foundation for personal growth and achievement. A DSU education seeks to serve as the vanguard for life-long learning for adults throughout the world.*

**July 2009**

- International Economics (IIEI-450)
- Importing Duties and Regulations (IIEI-140)
- Documentation Global Village (IIEI-225)
- Modern Management Principles (IIEI-335)
- Global Culture (IIEI-401)
- Purchasing Global Marketplace (IIEI-376)
- Competitive Human Resource Mgmt (IIEI-445)
- Business Statistics (IIEI-160)
- Understanding the ITAR (IIEI-306)
- Export Compliance Documentation (IIEI-311)
- Intro to the Revolutionary War (IIEI-188)
- Introduction to World Religions (IIEI-170)
- Ethics in Trade Compliance (IIEI-320)
- Understanding EAR (IIEI-307)
- Customs Broker's Exam Prep (IIEI-304)
- Understanding the ITAR (IIEI-306)
- Global Business Plan (IIEI-405)
- Canada Export Controls (IIEI-324)
- Freight Forwarder Practices (IIEI-127)
- Export Compliance Audit (IIEI-330)
- Mastering ITAR Exemptions (IIEI-308)

**August 2009**

- Introduction (OFAC) Regulations (IIEI-318)
- Agreements under the ITAR (IIEI-299)
- Topics in Import Management (IIEI-366)
- Customs Broker's Exam Prep (IIEI-304)
- Importing (IIEI-129)
- Empowered Officials Essentials (IIEI-257)
- Introduction To Business Writing (IIEI-118)
- Information Systems (IIEI-385)
- Global Marketing (IIEI-403)
- Basic Accounting Concepts (IIEI-230)
- Warehousing: Principles & Practices (IIEI-379)
- Customer Service Basics (IIEI-111)
- Global Supply Chain Strategies (IIEI-412)
- Ethics in Trade Compliance (IIEI-320)
- Exporting/Importing Environment (IIEI-201)
- Understanding EAR (IIEI-307)
- Port Authority: (IIEI-125)
- Organizational Behavior (IIEI-345)
- Export Compliance Documentation (IIEI-311)
- Intro to American Government (IIEI-151)
- Understanding the ITAR (IIEI-306)
- Importing Duties and Regulations (IIEI-140)

**New Course Nomenclature - IMPORTANT Change**

Over the next few months, you'll see some changes to the way we refer to classes on our website and elsewhere. To better reflect the content of the courses, our course naming practices will change. In the past, we've used IIEI (For example IIEI-306) to designate trade and business courses and DSU to reflect general education courses. As we grow and offer more courses on more topics, you'll see courses defined in specific departments.

In business and international trade, courses will be designated as:

- **BUS:** Business, Law and Marketing (i.e. BUS-332)
- **TRD:** International Trade Regulations, Export and Import Topics

- **SCM:** Supply Chain Management
- **FAE:** Finance, Accounting and Economics
- **MGT:** Management, Organization Behavior, Leadership and Human Resources

In general education topics, courses will be labeled:

- **STM:** Science, Technology and Mathematics
- **HAS:** Humanities, Social Sciences and Arts

Changing to our new naming system allows us to bring you more class offerings to help you meet your personal and professional goals.

**Bachelor Degree**

**Time is running out to apply to be in the Graduating Class of June 2011**

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Outside the U.S. 1+602-648-5750



## IEI Certifications

Congratulations to the following on successful completion and recent award of the respective certifications.

### Certified U.S. Export Compliance Officer®

Joane Ashley - TX	James Durnin - FL
Heather Beresford – TX	Robert Mayfield - IL
Derek Bresler - CA	Kristina O'Connor - CA
Robert Bromley - FL	Robert O'Connor - CA
Blane Carroll - NC	Robin Steiner - OR
Angela Davis – AZ	Launa White - CA

### Certified Exporter®

Diana de la Fuente	Ruby Rendon
Alicia Gonzalez	Juan de la Torre
Marion Kiefer	Edna Valdez
Audra Martinez	Ernesto Vazquez

### Certified International Trade Logistics Specialist®

#### Japan

Miki Chugenji	Yuki Ogawa
William Greg Lacy	Shiho Ouchi
Sachie Nakamura	Yuka Sekiguchi
Kaori Nashiro	Miho Yamanaka

#### Nigeria

Michael Adizue	Anthonia Nwachukwu
Sunday Agbor	Yusuf Mustapha Mohammed
Ezimadu Alex Anebi	Ihediwa Darlington Okezie
Isimakhomhen H. Boluwade	Loyah-Alpha Oiseorenrin
Ifedimma Chukwudi Christian	Mobolaji Akinniyi Salu
Akeke Adida Edwin	Ogosi Christopher Timi
Ukaefu Reginald Esomonu (E.)	Obanewa Yewande .O
Shobande Oluranti Folorunsho	Mbaeri Uche I.
Ifeoma Ichongini	Onyeme Ugochukwu
Awodiji Funmilayo Janet	Oke Kehinde Zaccheaus

### Trade Related IEI Certifications

#### Recognized and Accepted the World Over as the Global Standard

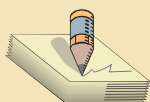
- ◆ Certified U.S. Export Compliance Officer®
- ◆ Certified ITAR Professional®
- ◆ Certified International Trade Manager®
- ◆ Certified International Trade Professional®
- ◆ Certified International Trade Specialist®  
Documentation, Logistics, Marketing and Finance
- ◆ Certified International Freight Forwarder®
- ◆ Certified U.S. Import Professional®
- ◆ Certified Exporter®

#### Under Development

- ◆ Certified United Kingdom Export Compliance Officer®
- ◆ Certified Canadian Export Compliance Officer®
- ◆ Certified People’s Republic of China Export Compliance Officer®
- ◆ Certified Australian Export Control Officer®
- ◆ Certified International Free Trade Zone Specialist® (Middle East)

The IEI Certification works with governments and industry experts worldwide in the development of the certifications shown here. If your government would like a trade compliance certification program, please contact us at [certifications@expandglobal.com](mailto:certifications@expandglobal.com). We look forward to working with you.

Disclaimer: IEI Certification credential testing is separate from Dunlap-Stone University and the International Import-Export Institute. Distance Education and Training Council (DETC) accreditation does not cover such certification. All courses offered by DSU/IEI that help prepare individuals for IEI Certification testing are accredited by DETC.



## Student Honor Roll

Honor - Distinction - Excellence

*The students shown here have demonstrated outstanding “A” performance for two or more consecutive semesters.*

Larry Abadie – CA  
Sherry Aitken - FL  
Akinbisola Akinroye - IA  
Stanley Allen – AL  
Jan Allmeyer - MO  
Linda Amber – NJ  
Sheik Ayube – FL  
Patricia Baldrige - MO  
Jacqueline Blanton - TN  
Eric Blum – SC  
Omar Bojang – NY  
Matt Boyle - KS  
Barbara Brown - MI  
Jose Camacho - CA  
Deborah Carpenter - RI  
Jorge Chromoy - NJ  
John Churchill - MD  
Kendra Cook - VA  
Paul Curry – MA  
Shane Daniels - FL

David Dean – IA  
LaQuita Donald - MS  
Annette Ferguson - NY  
Michael Frail - NY  
Aridth Gibbons – GA  
Andrea Gomez - AZ  
Andrea Gulacsi – PA  
Kimberly Harper – TX  
Cindy Hollohan – MA  
Marcie Hunnicutt - OH  
Melissa Italia - VT  
Brett Johnson – AZ  
Sandra Kamman - NJ  
Kathleen Kobran - VA  
Casey Kohl – IA  
Barbara Kostakos - MD  
Gary LaBute - TX  
Willette Lowe - AZ  
Katie Lynch – CT  
Brice Macartney - AZ

Sivaganesh Maharajan – WA  
Gail Marlowe – OH  
Frederick Martin - FL  
Terrance Mason - VA  
Robert Mayfield – IL  
Rita McCabe – NH  
Frank Mckown - CA  
Eddie Mendoza - AL  
Danielle Mulka – MI  
Anthony Munguia - TX  
Diane Nally - FL  
Donna Parks – DC  
Barbara Pearson - TX  
Jeff Peterson - MI  
Max Pischel – TX  
Henry Pizarro - CA  
David Power – TN  
Joel Quinones – FL  
Joanna Raible – AZ  
Patience Ramsey - CO

Trish Reynolds – ID  
Alecia Rice - OK  
Robyne Roberts – FL  
Robert Rulavage - PA  
Heidi Sankey – WI  
Sherry Sivaivai – WA  
Ulla Skeffington - NC  
Cynthia Soto – CA  
Lesley Spring - NM  
Toni Stivers – CA  
Cynthia Teed – MD  
Danielle Vasyak-Licholet – IN  
Debra Wagner - PA  
Alicia Worthington - PA

**Congratulations  
to Everyone!  
Well done!**



# The International Import-Export Institute

*at Dunlap-Stone University*

11225 North 28th Drive, Suite B-201

Phoenix, Arizona USA 85029

Phone: (800) 474-8013 Outside U.S. (602) 648-5750

Fax: (602) 648-5755

Email: [info@dunlap-stone.edu](mailto:info@dunlap-stone.edu)

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*Fall Semester  
Starts Soon!*

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Great careers don't just happen,  
they are planned!



Speak to an Academic Advisor today about your goals for tomorrow!

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