

**REQUEST FOR RECORDS DISPOSITION AUTHORITY**  
(See Instructions on reverse)

LEAVE BLANK

JOB NO

*NCI-151-82-6*

DATE RECEIVED

*July 8, 1982*

NOTIFICATION TO AGENCY

In accordance with the provisions of 44 U.S.C. 3303a the disposal request, including amendments, is approved except for items that may be stamped "disposal not approved" or "withdrawn" in column 10

*4.16.85*

**WITHDRAWN**

Date

Archivist of the United States

TO **GENERAL SERVICES ADMINISTRATION,  
NATIONAL ARCHIVES AND RECORDS SERVICE, WASHINGTON, DC 20408**

1. FROM (AGENCY OR ESTABLISHMENT)  
**U.S. Department of Commerce**

2. MAJOR SUBDIVISION  
**International Trade Administration**

3. MINOR SUBDIVISION  
**Assistant Secretary for Trade Administration**

4. NAME OF PERSON WITH WHOM TO CONFER  
**Charles Brett**

*RM 6/30/82*

5. TEL EXT  
**377-3430**

6. CERTIFICATE OF AGENCY REPRESENTATIVE

I hereby certify that I am authorized to act for this agency in matters pertaining to the disposal of the agency's records; that the records proposed for disposal in this Request of 17 page(s) are not now needed for the business of this agency or will not be needed after the retention periods specified.

**A** Request for immediate disposal.

**B** Request for disposal after a specified period of time or request for permanent retention.

C. DATE

*7-2-82*

D. SIGNATURE OF AGENCY REPRESENTATIVE

*Jay V. Parr*

E. TITLE

**Departmental Records  
Management Officer**

7. ITEM NO

8. DESCRIPTION OF ITEM  
(With Inclusive Dates or Retention Periods)

9. SAMPLE OR  
JOB NO

10. ACTION TAKEN

**DEPUTY ASSISTANT SECRETARY  
FOR EXPORT ENFORCEMENT**

The Deputy Assistant Secretary for Export Enforcement carries out, in consultation with the Office of General Counsel, a compliance program to enforce the Export Administration Regulations relating to foreign boycotts against countries friendly to the United States and to exports of U.S. goods and technology for purposes of national security and foreign policy; administers programs concerning foreign boycotts against countries friendly to the United States; and develops and coordinates measures for opposing such boycotts. Primary authority for these activities is vested in the Export Administration Act of 1979, as amended.

**WITHDRAWN**

The Deputy Assistant Secretary directs the following organizational elements:

- o Office of Export Enforcement
- o Office of Antiboycott Compliance

OFFICE OF THE DEPUTY ASSISTANT SECRETARY (DAS)

1. (Reserved)

OFFICE OF EXPORT ENFORCEMENT  
(formerly Compliance Division,  
Office of Export Administration)

The Office of Export Enforcement, in consultation with the Department's Office of General Counsel, enforces the Export Administration Regulations, except those relating to short supply commodity controls and foreign boycotts against countries friendly to the United States; serves as the primary contact point in matters relating to export enforcement, interpretation, investigation, policy formulation, and administrative and adjudicative proceedings in areas for which the Office is responsible. Its functions include:

- o development of intelligence information regarding areas of possible export control violations
- o investigation of actual and suspect violations, and preparation of cases on violations for referral for administrative proceedings by the Department and criminal prosecution by the Department of Justice
- o on-site physical inspections of cargo for evidence of export administration violations.

The Office develops and administers a program to insure maximum compliance with the Export Administration Regulations and at the same time having a minimum impact on normal trade practices; coordinates and directs facilitation activities to reduce paperwork and expedite the movement of cargo; encourages exporters to take advantage of simplified export clearance procedures; reviews export declarations and conducts other activities to assure that simplified procedures operate efficiently and effectively; works with the U.S. Customs Service and the U.S. Postal Service in developing, evaluating, and adjusting the export enforcement responsibilities of those agencies; works with the Bureau of the Census, Department of Transportation, and other government and private organizations in connection with facilitation matters; and studies and evaluates changing industry techniques, such as containerization to assure that enforcement methods are kept up to date.

The Office is comprised of the Office of the Director, Intelligence Division, Investigations Division, Technical Support Division, and Field Offices in major cities of the United States.

An official file station in the Office of the Director serves all elements of the Office located at headquarters. The records cannot be divided by Divisions since they are filed by a numeric subject arrangement. For the most part, records at the Field Offices are filed according to the numeric-subject scheme used in the headquarters Office, and their content parallels the content of those found there.

2. Consolidated Enforcement Subject File--both the usual variety of administrative (housekeeping) papers and program operations papers arranged by a numeric-subject system. The two categories of papers found in the file may be more specifically identified by the listing of a few of the file designations below:

A. Administrative Files

<u>File No.</u>	<u>Subject Heading</u>
2-1	General Administrative Files
2-1-A	Service, Supplies & Equipment
2-1A-2	Space

2-1-159	Performance Rating Program
2-1-165	Complimentary Letters to Investigations Division Staff
2-5	Career Development Program, Training Program
2-22	Catalogs (Correspondence)
2-23	Budget

The file folders containing housekeeping papers are consistently identified as such by members of the staff with only inconsequential deviations from the norm.

B. Program Operations Files

<u>File No.</u>	<u>Subject Heading</u>
2-1-190	Indoctrination of Agents in the Office of Export Enforcement
2-1-98	Interagency Meetings
2-1-98-E-1	Interagency Meetings (Department of Transportation)
2-17-E	Expansion of Liaison Activities
2-17-I	Office of Export Enforcement Functions, Programs & Enforcement Planning
2-20-A	U.S. Postal Service

The Administrative Files can be easily identified and segregated from Program Operations Files.

- a. Administrative Files--Destroy in accordance with General Administration Records Control Schedule.
- b. Program Operations Files--Permanent. Retire to RSHF when no longer needed for current business and transfer to WNRC 1 year later. Offer to the National Archives when 20 years old.

3. Administrative and Investigative Indexes--a (3x5) card index on which the names of all parties of interest that appear in incoming items are typed with a reference (numerical) to the file where the paper is located.

The cards are filed alphabetically.

Permanent. Retire to RSHF when no longer needed for current business and transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

4. Foreign Service Index--a (3x5) card index showing the name of the person or firm under investigation, the name of the investigator to whom the document was referred for action, and the file number. This index is really a work control device to locate documents while in process. It is also used to locate files when the requestor has little or no information concerning the case in which he is interested, except a geographical location and/or the name of the investigator that handled the matter. The Index was maintained between 1969 and 1978.

Permanent. Retire to RSHF when 2 years old and transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

5. Application for Export Licenses Index--a (3x5) card index of applications for export licenses received by the Office for review. The cards are arranged numerically by application numbers and show the date the application was received, review actions taken, and date of referral to sender, or to some other office. The cards for completed cases are withdrawn from the active file and maintained separately.

Destroy inactive cards when 3 years old.

6. Index of Export Information Service Reports--a (3x5) card index showing the CIA and DIA report numbers, date, security classification, subject, and the investigator to whom the report was referred.

Destroy when 3 years old.

7. (Reserved)

8. Closed Investigative Case Files--papers compiled by the Office in the process of collecting evidence on suspected or alleged violations of export controls. Each case concerned a violation or violations of Export Administration Regulations and has been completed and closed. Included is material relating to Denial Orders, letters of charges, warning letters, referrals to the Department of Justice, indictments, convictions, fines, returned without action notices, and transcripts of the Hearing Commissioner's or Court proceedings. More specifically, investigative cases include the following types:

- a. Unlicensed Shipment Cases
- b. Untimely Filing of Shipper's Export Declarations
- c. Violations of Suspension Orders
- d. Transshipments
- e. Transshipments through Canada

- f. Trafficking in Licenses
- g. Misrepresentations
- h. Technical Data Investigations
- i. Flagrant Disregard of Export Controls
- j. Alteration of Documents
- k. Unethical Practices
- l. Prelicensing and Postshipment Checks

The cases are closed when all actions have been taken and the appropriate sanctions, if indicated, have been imposed.

Permanent. Retire closed cases to RSHF when 2 years old and transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

9. Intelligence Case Files--serve as a source of information on firms and individuals suspected of possible or actual illegal activities contravening and/or violating the Export Administration Regulations. Documents comprising these files are gathered from a variety of sources, both from within and without the Department. Included here are copies of Shippers's Export Declarations, applications for export licenses, world trade data reports, State Department airgrams, application screen notices, intelligence reports, and the like.

A numerical classification system was used to organize the files through calendar year 1977. The file number referred to a specific geographic area or country, most often the latter. More recent files are maintained alphabetically by name of company or individual.

Permanent. Break file every 5 years. Move active files forward and retire all others to RSHF. Transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

10. Export Enforcement Statistical Reports--an action sheet is prepared for each action taken on a case handled during the period at the end of each month. These sheets show the case number, type of violation, the action taken, dollar value, country, and the commodities involved. Also shown is the penalty, if any, imposed. From these sheets, statistics are drawn to produce a monthly statistical report which shows the case load handled and other statistical information used to plan and direct the Office's activities.

An annual statistical report is compiled from the monthly reports. The data appearing in the annual compilation are broken down on the basis of both the calendar and fiscal year.

Data from the monthly and annual reports are used to prepare a budget submission showing the Office's investigative workload and other special reports.

- a. Action Sheet--Retire to RSHF when 2 years old and transfer to WNRC 1 year later. Destroy when 10 years old.
- b. Monthly, Quarterly, Annual, Budget and Other Special Reports--Permanent. Retire to RSHF when no longer needed for current business and transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

11. Facilitations File--copies of Shipper's Export Declarations selected from those in the custody of the Bureau of the Census.

The declarations are selected by developing a profile of export control violators from intelligence and directing the computer to scan all stored export data and report out declarations fitting the profile to an appropriate degree.

The criteria for selection of the declarations vary from time to time. All declarations and related papers which contain concrete evidence of an export violation are withdrawn and become a part of an investigative case file.

- a. Copies from Census--Destroy when 2 years old.
- b. All Others--Destroy when 1 year old.

Field Offices

These Offices are an extension of the headquarters Office and with some exceptions create and maintain files in the same manner covering the same subject areas as that Office.

12. Consolidated Enforcement Subject File--same types of papers arranged according to the same type of subject-numeric system as found in Washington. The papers are categorically separable and identifiable by the listing of a few of the file designations as shown below:

A. Administrative Files

<u>File No.</u>	<u>Subject Heading</u>
2-1	General Administration Files
2-1-A	Service, Supplies & Equipment
2-1A-2	Space
2-1-159	Performance Rating Program
2-22	Catalogs (correspondence)
2-23	Budget

For purposes of disposition, this category of papers is easily identified and segregated on a folder by folder basis from the remainder of the papers in the file.

B. Program Operations Files

<u>File No.</u>	<u>Subject Heading</u>
2-1-A-1	Consensual Monitoring
2-1-190	Indoctrination of Agents in the Office of Export Enforcement
2-1-98	Interagency Meetings
2-1-98-E-1	Interagency Meetings
2-1-98-E-2	ICACO Facilitation Sessions
2-20-A	U.S. Postal Service

This category of papers has long term significance since they document export enforcement policies and procedures.

- a. Administrative Files--Destroy in accordance with the General Administration Records Control Schedule.
- b. Program Operations Files--Permanent. Transfer to the appropriate Federal Archives and Records Center (FARC) when no longer needed for current business. Offer to the National Archives when 20 years old.

13. Foreign Service Index--a (3x5) card index to the Consolidated Enforcement Subject File used primarily to locate files while in process or to answer requests when the requestor has very little information about the case in which he is interested.

Permanent. Transfer to the appropriate Federal Archives and Records Center when 10 years old. Offer to the National Archives when 20 years old.

14. Index of Export Information--a (3x5) card index to the Consolidated Enforcement Subject File showing the report number, date, subject, and the name of the investigator to whom the report was referred.

Destroy when 2 years old.

15. Index of FBI Reports--a (3x5) card index showing date of report, subject (usually an individual or a firm's name), office of origin, destination, date, and file number. Withdraw cards from active file and file separately, when the subject report is destroyed.

Destroy inactive cards 2 years after destruction of the subject documents.



16. Closed Investigative Case Files--papers compiled by the Field Offices in the process of collecting evidence on suspected or alleged violations of export controls. Each case concerned a violation of Export Administration Regulations and has been completed and closed. Included is material relating to Denial Orders, letters of charges, warning letters, referrals to the Department of Justice, indictments, convictions, fines, transcripts of the Hearing Commissioner's or Court proceedings, and field notes. Among the types of investigative cases included here are: Unlicensed Shipment Cases, Diversion of Controlled Commodities, Violations of Suspension Orders, Misrepresentations, Flagrant Disregard of Export Controls, and so on.

The cases are closed when all actions have been completed and the appropriate sanctions, if indicated, have been imposed. Prior to October 1982, investigative cases handled by the New York Office were retired to the appropriate regional Federal Archives and Records Center. Beginning in October 1982, such cases have been duplicated in the headquarters Office of Export Enforcement for inclusion in the centralized closed investigative cases files maintained there.

Case files resulting in criminal or civil penalties (numbering 12 to 15 per year) generated by Field Offices often contain documentation not entirely duplicated in headquarters records. Therefore, they merit continued retention and eventual offering to the National Archives as indicated below.

- a. Case Files closed prior to October 1982--Permanent. Retire to a Federal Archives and Records Center (FARC) when 3 years old. Offer to the National Archives when 20 years old.
- b. Case files closed after September 1982 resulting in the assessment of criminal or civil penalties--Permanent. Retire to a FARC when 3 years old. Offer to the National Archives when 20 years old.
- c. All other closed case files--Retire to a FARC when 3 years old. Destroy when 10 years old.

17. Facilitations File--copies of Shipper's Export Declarations collected by inspectors conducting "saturation" examinations of shipments at selected points. These declarations are collected because the exporter has committed an error of omission or commission in filling out the declaration, or because there is some evidence of an export control violation. In most cases, copies of correspondence asking the exporter to correct the error or pointing out the proper procedure to be followed are filed with the declaration.

Declarations and related papers supporting an alleged export control violation are forwarded to Washington and become a part of the investigative case file.

Shipper's Export Declarations and Related Correspondence upon which action has been completed--Destroy when 1 year old.

OFFICE OF ANTIBOYCOTT COMPLIANCE  
(formerly Antiboycott Compliance Staff)

The Office implements reporting and enforcement activities regarding foreign boycotts against countries friendly to the United States. These responsibilities have been vested in the Deputy Assistant Secretary (DAS) for Export Administration (and predecessor organizations) since 1965. Originally, report processing and enforcement functions were assigned to OEA's Operations and Compliance Divisions, respectively. In July 1978, however, the Antiboycott Compliance Staff was created. All foreign boycott functions, procedures, and programs were centralized in the staff (ITA Organization and Function Order No. 45-1, amendment 3, dated July 5, 1978), which became part of the immediate office of the DAS. Its statutory responsibilities were defined by the Export Administration Act of 1969, as amended.

The present Office of Antiboycott Compliance (OAC) operates under authority of the Export Administration Act of 1979, and its mandate is described by ITA Organization and Function Order No. 41-4, dated May 18, 1982. OAC is charged with:

- o administering and, in consultation with the Department's Office of General Counsel, enforcing the regulations and programs required to carry out Departmental responsibilities under the Export Administration Act of 1979 regarding foreign boycotts against countries friendly to the United States
- o developing and coordinating policies and measures for opposing such boycotts
- o operating the automated Boycott Reporting System (BRS) to provide statistical summaries and enforcement data

In pursuing these functions, the Office serves as a principal source of advice to executive officials of the Department and to the DAS on matters relating to regulations, interpretations, and investigations, as well as the development of regulatory policy and adjudicative procedures in areas for which it is responsible.

OFFICE OF THE DIRECTOR

18. Antiboycott Subject File--correspondence, memoranda, reports, studies, and the like generated or collected by the Director and his staff which describe the policies, procedures, functions, and accomplishments of the Office. Some of the files described here were created at the Office or Staff Director level by elements of Export Administration previously responsible for this activity.

Notable subject headings include Administrative Procedures Pre-Charging Settlements, Pleadings and Memoranda of Law, Foreign Corrupt Practices Act, European Reaction to Boycott, Disclosure of Information, Export Disincentives, Enforcement, Reporting Requirements and Status Reports. Files are maintained by subject content.

Permanent. Break file every 5 years. Move active files forward and retire all others to RSHF. Transfer to WNRC 1 year later. Offer to the National Archives when 20 years old.

19. Antiboycott Country File--State and Commerce Department cables, news-clippings, printed material, and the like arranged alphabetically by country and thereunder, by subject. Subsidiary subject titles include AJC, Boycott, Business Practices, Blacklisted Firms, Oil, Political Domestic, and so on.

Break file every 5 years. Retire to RSHF and transfer to WNRC 1 year later. Destroy when 10 years old.

#### Compliance Officers

Part 369 of the Export Administration Regulations (EAR) implements United States policy against complying with foreign boycotts as expressed in the Export Administration Act (the Act) of 1979 (50 U.S.C. App. 2401 et seq.). This legislation requires a United States person "...who receives a request to take any action which has the effect of furthering or supporting a restrictive trade practice or boycott fostered or imposed by a foreign country against a country friendly to the United States or against any United States person..." to report such a request to the Department of Commerce. The term "United States person" means an individual U.S. resident or national; domestic concerns, "controlled in fact" foreign subsidiaries; Federal, state and local governments; and partnerships, corporations, companies, associations or other entities organized under U.S. Federal and/or state laws, among others.

OAC compliance officers engage in the enforcement of the Act and/or provide support to the Office Director in developing and coordinating policies and measures for monitoring and opposing such boycotts.

20. Antiboycott Compliance Investigative Case Files--as noted above, all United States persons must report receipt of boycott requests as defined by the EAR, Part 369. The Reporting Processing Unit (RPU) of the OAC receives, analyzes, and codes such reports. Any report filed by a company which indicates action taken on a prohibited request is forwarded to a compliance officer for review. Reports received naming other parties to transactions, who have not

reported, are also used to initiate inquiries. Investigations are begun when one or more of the following prohibitions have or appear to have been violated:

- a. Refusals to do business
- b. Discriminatory actions
- c. Furnishing information about race, religion, sex or national origin
- d. Furnishing information about business relationships with boycotted countries or blacklisted persons
- e. Furnishing information about associations with charitable and fraternal organizations
- f. Implementing letters of credit containing prohibited conditions or requirements

Resolution of a case may take the form of a criminal or civil sanction, including fines, denial of export privileges, and/or imprisonment.

Files are arranged numerically by case number and also include the respondent's name. Since 1978, the file number has indicated the calendar year in which the case was opened, followed by the sequential number of that individual case, e.g., 82-1, 82-2, 82-3, etc. Among the papers found here are correspondence, workpapers, notes, investigation reports, exhibits, charging letters, warning letters, orders, consent agreements, abstracts of correspondence, drafts of documents, press releases, Report of Restrictive Trade Practice or Boycott Single or Multiple Transactions (Forms ITA-621P and ITA-6051P, or equivalents), and related documentation.

Permanent. Retire closed cases to RSHF when 5 years old and transfer to WNRC 2 years later. Offer to the National Archives when 20 years old.

21. Report on Oral Communications Concerning Boycott Regulations (Form ITA-6045, or equivalent)--a 3-part NCR form documenting advice and counsel given by OAC staff members in response to inquiries from the private and public sectors regarding all aspects of Boycott Regulations. Primarily, these deal with discussions between OAC and exporters, banks, freight forwarders, and similar entities requesting guidance on what activities are and are not permissible under the regulations. The white copy of the form is maintained as a Telephone Chronological File, while the yellow and pink copies are forwarded to Compliance Officers for action/information, as appropriate. Files are arranged as:

- a. Telephone Chronological File (white copy)--Destroy when 1 year old.
- b. All other copies--Destroy when no longer needed for current business or when 5 year old, whichever occurs first.

24. Investigative Index--a (3x5) card file alphabetically arranged by name of respondent. It offers a brief summary of all actions taken with respect to a particular investigation. Information listed includes the case number, the compliance officer responsible for the investigation, case development chronology, and the opening and closing dates of the case.

Permanent. Retire to RSHF when no longer needed for current business and transfer to WNRC 1 year later. Offer to the National Archives when 20 years old.

Report Processing Unit (RPU)

The RPU serves as the basic support arm of the Office. It receives all boycott reports submitted by U.S. persons receiving boycott requests, and analyzes and codes these reports. The unit serves as a focal point for insuring compliance with Part 369 of the EAR, provides statistics for the annual report to Congress required by the Export Administration Act of 1979, refers reports indicating violations of the foreign boycott provisions of the Act to compliance officers for investigation, and aids other elements of ITA such as the Freedom of Information Officer and the Office of Domestic Operations in meeting their official responsibilities. The RPU was originally part of the Management Services Branch, Operations Division, OEA, until the establishment of the Office of Antiboycott Compliance.

25. Boycott Report Processing Program File--arranged alphabetically by subject, this consists of copies of correspondence, memoranda, notes, reports, workpapers, and printed and processed material documenting the activities and functions of the RPU. Notable headings include AJC Case, Anti-Trust-Justice, Committee Reports, Compliance, Departmental Letters on Boycott, Legislation, Semi-annual Statistics and Trane Case. The papers are essentially of short-term value as they deal with the day-to-day operations of the unit. Record copies of the documents are maintained elsewhere in OAC or in Export Administration.

Move active files forward at the end of each year. Destroy inactive files when 2 years old.

26. Case Files of Reports of Restrictive Trade Practices or Boycott Requests--reports of requests made to U.S. firms or individuals to participate in restrictive trade practices or boycotts against either U.S. citizens or firms or countries friendly to the United States. Such reports are made in accordance with law to the Office of Antiboycott Compliance by U.S. firms or individuals which have received the boycott requests from foreign countries to which goods or services are to be delivered.

Among the documents found here are Report of Request for Restrictive Trade Practice or Boycott-Single Transaction (Form ITA-621P, or equivalent); Report of Request for Restrictive Trade Practice or Boycott-Multiple Transactions (Form ITA-6051P, or equivalent); correspondence and copies of documents from foreign countries, such as contracts, letters of credit, purchase orders, or questionnaires in which the boycott requests are made to foreign firms; and related papers. Boycott case files created prior to April 1977 are arranged alphabetically by the type of organization reporting the request, viz., banks, exporters or carriers. Reports submitted since the 2nd quarter of 1977 are filed in Firm Identification Number (FIN) sequence. Each reporting firm is assigned a unique FIN to identify its reports.

Retire to RSHF when 2 years old and transfer to WNRC immediately. Destroy when 5 years old.

27. Special Case Files on Late Reports Not Involving Litigation--boycott or restrictive trade practice reports received after the reporting deadline. These are referred to compliance officers for review, who determine that no further action or litigation is required.

Retire to RSHF when 5 years old and transfer to WNRC immediately. Destroy when 8 years old.

28. Statistical Worksheets on Boycott Reports--tabulations and intermediate working papers generated in connection with the periodic preparation of statistics on the status of the boycott reporting program.

Destroy 1 year after the resulting final report is prepared.

29. Boycott Reports Microform--reports of requests received on or after October 7, 1976, as well as any accompanying documents filed with the reports, are made available for public inspection and copying, except for certain proprietary information. Such reports are microfilmed to facilitate public access.

Primary responsibility for making this sanitized microfilm available for review lies with ITA's Freedom of Information Records Inspection Facility of the Office of Organization and Management Support. The RPU copy serves only as a security backup.

Destroy when 5 years old.

30. Boycott Reporting System (BRS)--an automated system designed to facilitate the reporting and enforcement functions of the OAC. Principal aims of the BRS are: (1) the preparation of OAC's

submission for the annual report to Congress required by the Export Administration Act of 1979; (2) monitoring compliance with the foreign boycott reporting requirements expressed in the Act and referring actual or potential violations to OAC compliance officers for appropriate action; and, (3) providing data to other ITA elements, specifically, the Freedom of Information Officer and the "E" awards unit of the Office of USCS Operations, to enable them to carry out certain statutory functions.

Source documents are used to keypunch the data into the computer. These include Report of Request for Restrictive Trade Practice or Boycott Request-Single or Multiple Transactions (Form ITA-621P and ITA-6051P, or equivalents), Boycott Report Coding Sheet Single Transaction (Form ITA-6033, or equivalent), and Boycott Report Coding Sheet Multiple Transactions (Form ITA-6055, or equivalent). Resulting output indicates, among other things, month and year the report is processed, type of restrictive trade practice, type of transaction, reporting FIN and firm type, originating country, and dollar value.

- a. Source documents: Dispose of in accordance with instructions listed earlier in this schedule.
- b. Punch cards: Destroy after verification of data on related magnetic media.
- c. Printouts: Destroy when superseded or obsolete.
- d. Magnetic tapes: Destroy when 5 years old.

22. Foreign Boycott Public Comments--whenever the Secretary of Commerce proposes implementing amendments to existing legislation or regulations as defined by the Export Administration Act of 1979 (and previous Acts), he shall by law consult with such affected industries as he deems appropriate. Proposed regulations, or revisions thereto, are published in the Federal Register to invite public comment. Where foreign boycott and related matters are concerned, this authority has been delegated to OAC.

These papers principally deal with the 1977 amendments to the Export Administration Act of 1969, as amended, and with the development of foreign boycott reporting requirements under the same. Included here are correspondence from law firms, members of Congress, industry, and fraternal organizations; internal Department deliberations; notes; workpapers; and the like. Final, approved versions of the regulations are transmitted to the Management Services Branch, Operations Division, OEA, for publication. An alpha-numeric file arrangement is employed, including the job number, if any, assigned by the Management Services Branch.

- a. Files raising significant issues about or leading to major revisions of the Export Administration Regulations, or contributing to changes in OAC policies and procedures--Permanent. Retire to RSHF when 5 years old and transfer to WNRC 1 year later. Offer to the National Archives when 20 years old.
- b. All other papers--Destroy when 5 years old or when no longer needed for current business, whichever is sooner.

23. "E" and "E Star" Awards Company Files--these awards were instituted by Executive Order 10978 on December 5, 1961, and by authority of the Secretary of Commerce on August 4, 1969, respectively, to recognize outstanding achievement in the field of export expansion by U.S. persons, firms or organizations. The primary program responsibility is presently vested in the "E" Awards Section attached to the Office of Domestic Operations, Director General for the U.S. and Foreign Commercial Service.

Extensive clearance procedures are undertaken prior to the granting of the awards. OAC essentially reviews an applicant's record in complying with foreign boycott reporting requirements under Part 369 of the EAR. When completed, its findings are transmitted to the Office of Domestic Operations for inclusion in the formal application file. Violation of the EAR precludes the granting of either of these awards.

Arranged alphabetically by company name the files include correspondence, memoranda, and related documentation. They are generally of short-term value only.

Destroy closed cases when 2 years old.



GENERAL NOTE:

Administrative Records Common to All ITA Offices

The files listed below are in ITA's Records Control Schedule under Section I. General Administration: ITA Records Common to All Offices. Refer to that Section for appropriate disposition.

<u>File Title</u>	<u>Page No.</u>
Administrative Subject File. . . . .	1
Press Releases, Statements, Speeches, and Testimonies. . . . .	2
Chronological, Reading, Tickler or Suspense Files. . . . .	2
Reproducibles File . . . . .	2
Charity Campaign and Bond Drive File. . . . .	2
Job Applications. . . . .	2
Classified Information Accounting and Control Records. . . . .	2
Top Secret Accounting and Control Files. . . . .	3
Classified Document Container Security Files. . . . .	3
Indexes or Check Lists. . . . .	3
Personnel Statistical Reports. . . . .	4
Personnel Folders Maintained Outside of the Office of Personnel, ITA. . . . .	4
Information Requests File. . . . .	4
Acknowledgment Files. . . . .	4
Mailing Lists. . . . .	4
Records/Logs of Mail, Visitors or Telephone Calls. . . . .	4
Technical Information Files . . . . .	4
Congressional Correspondence File. . . . .	5
Freedom of Information Act (FOIA) Requests Files. . . . .	5
FOIA Appeals Files. . . . .	6
Privacy Act Requests Files. . . . .	6
Privacy Act Amendment Case Files. . . . .	7
Privacy Act Accounting of Disclosure Files. . . . .	8
Career Development and Training Work Files. . . . .	8

Deputy Assistant Secretary  
 for Export Enforcement  
 International Trade Administration  
 U.S. Department of Commerce

Listing of Permanent Records  
 (all volume totals are in cubic feet,  
 unless otherwise noted)

<u>Item No.</u>	<u>File Title</u>	<u>Arrangement</u>	<u>Previous Appraisal</u>	<u>Volume</u>	<u>Accretion</u>
2 (b)	Consolidated Compliance Subject File-Program Operations	Numeric-subject	NC1-151-77-1/1233 (b)	111	3.5
3	Administrative and Investigative Indexes	Alphabetical by name	NC1-151-77-1/1234	32.3	1
4	Foreign Service Index	Alphabetical, by name	NC1-151-77-1/1235	2	0
8	Closed Investigative Case Files	By case number	NC1-151-77-1/1239	531.25	16.6
9	Intelligence Case Files	Subject-numeric; Alphabetical by name	None	224.25	7
10 (b)	Export Compliance Statistical Reports-Monthly, Quarterly, Annual, Budget and Other Special Reports	Chronological and Subject	NC1-151-77-1/1240 (b)	2	.08
12 (b)	Consolidated Compliance Subject File-Program Operations	Numeric-Subject	NC1-151-77-1/1242 (b)	3	.15
13	Foreign Service Index	Alphabetical, by name	NC1-151-77-1/1243	2	0

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16	Closed Investigative Case Files	By case number			
a)	Closed Investigative Case Files	By case number	NC1-151-77-1/1239	123	5
b)	Closed Investigative Case Files	By case number	NC1-151-77-1/1239	75	5
18	Antiboycott Subject File	By subject	None	10	2
20	Antiboycott Compliance Investigative Case Files	By case number	None	46	10
22a)	Foreign Boycott Public Comments	Alpha-numeric	None	3	.5
24	Investigative Index	Alphabetical, by name of respondent	None	.2	.07

Crossover for the Records Control Schedule Dealing with the Files of  
the Deputy Assistant Secretary for Export Enforcement

Former Records Control Schedule (RCS)

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