



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

Case No. CU-2015-318654-1

Mark Wasden, Esq.
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1700 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006-4707

Dear Mr. Wasden:

This is in reply to your January 16, 2015 request (“Application”), and additional correspondence dated March 16, 2017 and October 10, 2017, on behalf of the American National Standards Institute (ANSI) and ANSI-accredited U.S. Technical Advisory Groups (together, “Applicants”), for a specific license authorizing the Applicants to engage in standards development activities at the International Organization for Standardization (ISO) and the International Electrotechnical Committee (IEC). This letter addresses activities involving Cuba; the Office of Foreign Assets Control (OFAC) has responded separately to your requests with respect to activities involving Iran, North Korea, and Sudan.

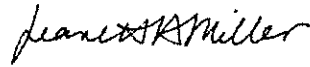
According to your Application, ANSI is a private, non-profit membership organization and coordinator for the United States private-sector voluntary standardization system. It is the sole U.S. representative and dues-paying member of ISO and IEC. The Applicants’ activities at the ISO and IEC include collaboration in technical committees, subcommittees, and working groups, exchanges with national delegation experts and standards-setting representatives from Iran, Cuba, Sudan, and North Korea, and full participation in the public review and national adoption process.

The Cuban Assets Control Regulations (CACR) prohibit persons subject to the jurisdiction of the United States from dealing in property in which Cuba or a Cuban national has an interest and from importing Cuban-origin merchandise into the United States, unless the activities at issue are authorized or exempt from prohibition. 31 C.F.R. §§ 515.201, 515.204. Section 515.206 of the CACR exempts from prohibition the importation or exportation of “information and informational materials.” On January 27, 2016, OFAC amended section 515.545 of the CACR. Section 515.545(a) now authorizes transactions related to the creation, dissemination, or enhancement of exempt informational materials. 31 C.F.R. § 515.545(a). This general license authorizes the licensing of standards with the right to revise or create derivative works.

It appears that the information exchanged in the international standards development activities described in the Application is information or informational materials exempt from prohibition, and that the Applicants’ participation with Cuban entities in those activities is authorized by the general license at section 515.545(a) of the CACR. OFAC does not issue specific licenses authorizing transactions that are exempt from prohibition or authorized by a general license. 31 C.F.R. § 501.801. Accordingly, we are taking no further action on the Application.

If you have any additional questions, you may refer to the OFAC website at www.treasury.gov/ofac or call our office at (202) 622-2480.

Sincerely,



04/10/2018

Jeanette A. Miller
Deputy Assistant Director for Licensing
Office of Foreign Assets Control

Date