

## Commodity Classification Review

Correctly classify your dual-use goods and technology by searching the Commerce Control List (CCL) and its categories to determine the Export Control Classification Numbers (ECCN). The CCL is divided into ten broad categories, and each category is further subdivided into five product groups. The ECCN is an alpha-numeric code that describes the item and indicates licensing requirements. All ECCNs are listed in CCL (Supplement No. 1 to Part 774 of the EAR) which is available on <https://www.bis.doc.gov/index.php/regulations/commerce-control-list-ccl>.

### Commerce Control List Categories

0	Nuclear Materials, Facilities And Equipment (and Miscellaneous Items)
1	Materials, Chemicals, Microorganisms and Toxins
2	Materials Processing
3	Electronics
4	Computers
5	Part 1 -- Telecommunications and Part 2 -- Information Security
6	Sensors and Lasers
7	Navigation and Avionics
8	Marine
9	Aerospace and Propulsion

### Five Product Groups

A	End Items, Equipment, Accessories, Attachments, Parts, Components, and Systems
B	Test, Inspection and Production Equipment
C	Materials
D	Software
E	Technology

### Example 1. Commodity Classification Tables

For example, you plan to ship a semiconductor wafer that is described as a Gallium nitride wafer.

First, review the CCL to determine the Category. Don't just search with a general term or two and assume the commodity is not on the list. This may take a bit of review as it's much better to be thorough. A semiconductor is an "Electronic" item, so it is Category 3. Next, review the Product Group. Gallium nitride is a "Material", so it's in Product Group C. Now we know our item to be shipped is on the CCL as 3C. We must determine the ECCN in order to complete the classification identification of the item.

An ECCN is a designation that an item, which can be a tangible or intangible (i.e., software or technology), is controlled because of its specific performance characteristics, qualities, or

designed- end use. An ECCN is much more narrowly defined and is focused on Product Group categories. ECCNs are five-digit alphanumeric designations that categorize items based on the nature of the product, i.e., type of commodity, software, or technology and its respective technical parameters.

**Commerce Control List**

**Supplement No. 1 to Part 774**

**3C005 High resistivity materials as follows**  
(See List of Items Controlled).

**License Requirements**

*Reason for Control:* NS, AT

<i>Control(s)</i>	<i>Country Chart (See Supp. No. 1 to part 738)</i>
NS applies to entire entry	NS Column 2
AT applies to entire entry	AT Column 1

**List Based License Exceptions** (See Part 740 for a description of all license exceptions)

*LVS:* \$3000

*GBS:* Yes

**List of Items Controlled**

*Related Controls:* See ECCN [3E001](#) for related development and production technology, and ECCN [3B991.b.1.b](#) for related production equipment.

*Related Definition:* N/A

*Items:*

- a. Silicon carbide (SiC), gallium nitride (GaN), aluminum nitride (AlN) or aluminum gallium nitride (AlGaN), Gallium Oxide (Ga<sub>2</sub>O<sub>3</sub>), or diamond semiconductor “substrates”, or ingots, boules, or other preforms of those materials, having resistivities greater than 10,000 ohm-cm at 20°C;

**3C006 M**  
consisting  
with at l  
**Carbide**  
**Aluminum**  
**Nitride (**  
**diamond.**

**License B**

*Reason*

NS a entry
AT a entry

**List Base**  
a descript

*LVS:* \$:

*GBS:* Y

**List of It**

*Related*  
“develo  
ECCN  
“produc  
[3B991.1](#)  
equipm

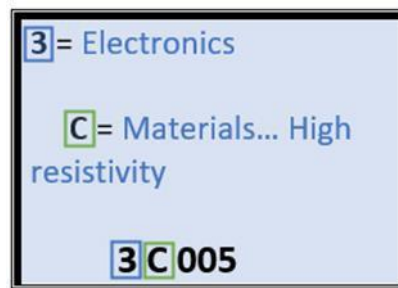
*Related*  
*Items:*

**Example 2. Supplement No. 1 to Part 774 of the EAR (CCL Chapter)**

ECCNs are enumerated on the CCL, and each one lists important information that includes a general description of the controlled item(s), the reason(s) for control, available license

exceptions, and, when necessary, additional details on related controls, and more specific item definitions.

Now, let's determine the ECCN for the Gallium nitride wafer which we have determined is Category 3 and Product Group C by reviewing the Supplement No. 1 to Part 774 of the EAR (CCL Chapters) at <https://www.bis.doc.gov/index.php/regulations/export-administration-regulations-ear>. Review the CCL chapter on Category 3 "Electronic" until you find the Product Group C "Materials. Once you've found "3C" you will review the chapter for the numerical code that meets the criteria of your item to be shipped. For Gallium nitride wafer the numerical code is "005.a" which describes the "materials" of the "electronic" item you are shipping.



### Example 3. Alpha-numeric Code

**Please note**, if your item falls under U.S. Department of Commerce jurisdiction and is not listed on the CCL, it is designated as EAR99. EAR99 items generally consist of low-technology consumer goods and do not require a license in many situations. However, if you plan to export an EAR99 item to an embargoed country, to an end-user of concern, or in support of a prohibited end-use, the campus Export Control Officer will work with you to obtain any necessary export licenses.