

**Commodity Classification**  
**Case Number: Z1824997**  
**Date of Completion:**  
**May 20, 2024**



**UNITED STATES DEPARTMENT OF COMMERCE**  
**BUREAU OF INDUSTRY AND SECURITY**  
**WASHINGTON, D.C. 20230**

Cobra AERO, LLC  
ATTN: Sean Hilbert  
240 Uran Street  
Hillsdale, MI 49242

G196300

THE FOLLOWING INFORMATION IS IN RESPONSE TO YOUR INQUIRY OF April 12, 2024 REQUESTING  
COMMODITY CLASSIFICATION(S) FOR:

COMMODITY	ECCN	SUBPARAGRAPH
A99 is a purpose-built propulsion system for Group 3 Autonomous Aircraft.	EAR99	
A99		

COMMENTS FROM LICENSING OFFICER(S):

ITEM #1:

This item is classified under ECCN EAR99 and as such may be exported without a license using symbol NLR (no license required). You have a responsibility to determine the nature and activities of potential customers using the "Know Your Customer Guidance" (Suppl. No. 3 to Part 732 of the Export Administration Regulations (EAR)). Prior to any export you should review the 10 Prohibitions outlined in Part 736 of the EAR. Additionally, a license is required to export an item subject to the EAR, even when not otherwise necessary, if you know, have reason to know, or are otherwise individually informed by BIS with respect to a specific transaction that the item will be used in activities related to nuclear, chemical, or biological weapons; missile delivery systems; or other prohibited end-users or end-uses as defined in Part 744 of the EAR.

JOHN VARESI  
DIVISION DIRECTOR

FOR INFORMATION CONCERNING  
THIS CLASSIFICATION CONTACT  
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BIS/EA/STC/SA