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FOIA Request
Department of the Treasury
Washington, DC 20220
Fax: 202-622-3895
[Online FOIA Request Form](#)

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DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

FOIA No.: 2014-01-045

OASIS No.: GN-697848

APR 14 2014

This letter is our final response to your Freedom of Information Act (FOIA), 5 U.S.C. § 552, request, dated December 31, 2013 to the Department of Treasury. You requested all correspondence (paper and letter correspondence in either direction) between OFAC and the House Committee on Financial Services and/or the Senate Committee on Finance during the calendar years 2012 to 2013. Your FOIA request was referred to OFAC for processing on January 16, 2014.

Please be aware that OFAC is experiencing a substantial backlog of FOIA requests that has adversely affected its response time.

OFAC has conducted a search of its records and found 42 responsive pages. These records are being released to you in full. For your reference, the Trade Sanctions Reform and Export Enhancement Act of 2000 (TSRA) Reports to Congress can be found online at <http://www.treasury.gov/resource-center/sanctions/Programs/Pages/lic-agmed-index.aspx>.

Provisions of the FOIA allow us to recover part of the cost of complying with your request. In this instance, no fees have been assessed.

If you have any questions or would like to discuss this matter, please feel free to email OFACFOIAOffice@treasury.gov or contact us at our FOIA Requester Service Center at 202-622-2500, option 3. Please reference FOIA No. 2014-01-045 in all future correspondence.

Sincerely,

Marshall H. Fields, Jr.

Assistant Director

Information Disclosure and Records Management

Office of Resource Management

Office of Foreign Assets Control

Enclosures: Responsive Documents (42 pages)



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

JAN 31 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Hatch:

Please find enclosed the quarterly report for the period April 1 – June 30, 2011, submitted under § 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

Sincerely,

Adam J. Szubin

Director

Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

JAN 31 2012

The Honorable Max Baucus
Chairman
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

Please find enclosed the quarterly report for the period April 1 – June 30, 2011, submitted under § 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

OFFICE OF FOREIGN ASSETS CONTROL

REPORT OF LICENSING ACTIVITIES

PURSUANT TO

THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000

April – June 2011

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Department of the Treasury's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from April through June 2011. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the licensing regime set forth in Section 906 of the TSRA.

From April 1 through June 30, 2011, OFAC's Licensing Division received a total of 467 applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued a total of 485 licensing determinations,¹ of which 177 were for cases received in this quarter. OFAC issued 330 licenses, 48 license amendments, 75 "return-without-action" letters, and 2 denial letters in this quarter. Of the total licenses issued, 296 involved products for Iran and 34 for Sudan. For more details, see Charts 1-3 and Graph 1.

CHART 1
Number of License Applications and Licenses Issued by Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	133	35	299	467
Licenses Issued	105	19	206	330
License Amendments Issued	17	0	31	48
Applications Denied	0	1	1	2

¹A "licensing determination" is any action that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, or a close-out determination.

CHART 2
Number of License Applications and Licenses Issued by Country

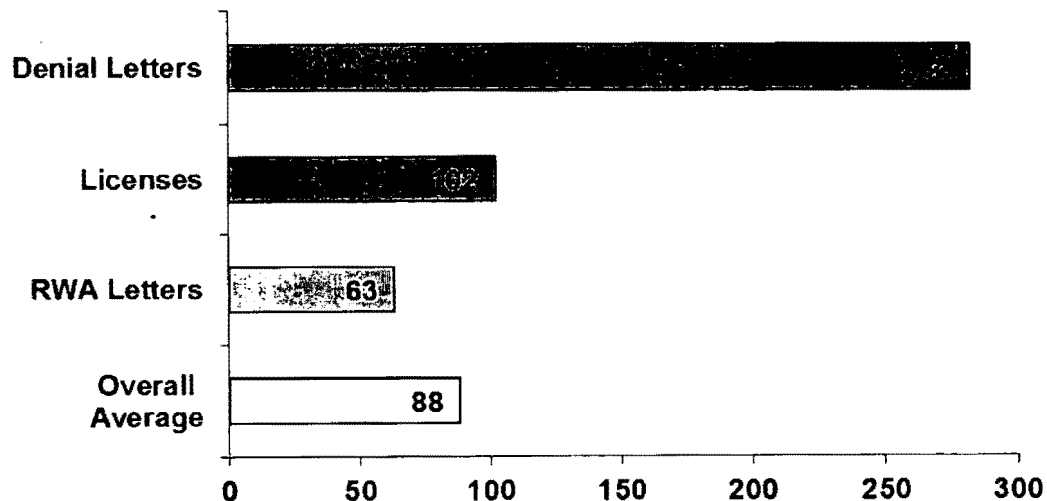
	Iran	Sudan	TOTAL
License Applications	429	38	467
Licenses Issued	296	34	330
License Amendments Issued	43	5	48
Applications Denied	2	0	2

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	116	33	280	429
Licenses and License Amendments Issued	107	16	216	339
SUDAN				
License Applications	17	2	19	38
Licenses and License Amendments Issued	15	3	21	39

GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**



JO ANN EMERSON
MEMBER OF CONGRESS
8TH DISTRICT, MISSOURI

COMMITTEE:
APPROPRIATIONS
SUBCOMMITTEES:
CHAIR, FINANCIAL
SERVICES AND GENERAL GOVERNMENT
AGRICULTURE, RURAL DEVELOPMENT,
FOOD AND DRUG ADMINISTRATION,
AND RELATED AGENCIES
LEGISLATIVE BRANCH

<http://www.house.gov/emerson>

Congress of the United States
House of Representatives
Washington, DC 20515-2508

February 7, 2012

The Honorable Timothy Geithner
Secretary
Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, D.C. 20220

Dear Secretary Geithner:

Yesterday, the President, by Executive Order, froze all Iranian government and financial institution linked assets held in U.S. financial institutions. Nevertheless, it has come to my attention that the Society for Worldwide Interbank Financial Telecommunications (SWIFT) is potentially providing Iranian institutions identified as affiliates of Iran's Revolutionary Guard Corps access to the U.S. and global financial market. Since the Iranian hostage crisis in 1979, the United States has imposed sanctions on Iran. More recently, we renewed our 1997 prohibition on trade and investment with Iran. Shortly thereafter, the Office of Foreign Assets Control (OFAC) published regulations that clarified its efforts to enforce that ban.

OFAC's Iranian Financial Sanctions Regulations (IFSR) provide that financial institutions in the United States, and their foreign affiliates, are prohibited from processing U-turn transactions or servicing accounts affiliated with the government of Iran, including, but not limited to, Iran's Revolutionary Guard Corps. Last year, despite these prohibitions, over 1.6 million messages involving banned Iranian financial institutions were processed using SWIFT. It is my understanding that these messages contain financial information which includes transactions used to allegedly finance the proliferation of nuclear weapons in Iran. If accurate, it is clear that the President's Executive Order was not extensive enough to completely cut off the Iranian government's access to the U.S. and world financial markets.

The lack of clarity surrounding OFAC's supervision of financial transactions facilitated by SWIFT is a serious omission in our effort to curtail the development of a nuclear weapons effort in Iran. As such, I am requesting a report, by March 21, 2012, that briefly summarizes, in plain English, OFAC's efforts to terminate SWIFT's relationship with prohibited Iranian financial institutions. If OFAC is not currently undergoing any efforts to terminate SWIFT's relationship

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(573) 756-9755

35 COURT SQUARE
SUITE 300
WEST PLAINS, MO 65775
(417) 255-1515

Honorable Timothy Geithner

February 7, 2012

Page 2

with prohibited Iranian financial institutions, please provide guidance as to why or describe existing barriers to OFACs efforts to execute the mandates of IFSR.

I look forward to reviewing your timely response.

Sincerely,

A handwritten signature in black ink, appearing to read "Jo Ann Emerson", with a long horizontal flourish extending to the right.

JO ANN EMERSON

Chairwoman

Subcommittee on Financial Services
and General Government



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

March 21, 2012

The Honorable Jo Ann Emerson
Chairwoman
Subcommittee on Financial Services
and General Government
U.S. House of Representatives
2230 Rayburn House Office Building
Washington, DC 20515

Dear Chairwoman Emerson:

Thank you for your letter of February 7, 2012, to Secretary Geithner, regarding the activities of the Society for Worldwide Interbank Financial Telecommunication ("SWIFT") and Iran. The Treasury Department agrees fully with your concern regarding the threats posed by designated Iranian financial institutions and the vital importance of cutting their ties to the international financial system. A key part of the Treasury Department's efforts to qualitatively increase the pressure on Iran has been to choke off the bad actors in Iran from the international financial system, much as Iran has long been excluded from the United States.

As you know, SWIFT is a Belgium-based cooperative that provides secure communication between financial institutions. For the past several months, Senior Treasury officials have engaged in sustained discussions with our European counterparts and with senior SWIFT management to press the importance of discontinuing SWIFT's financial messaging services to designated Iranian banks.

We were gratified when, on March 15, 2012, the Council of the European Union announced a prohibition on the provision of specialized financial messaging services to banks or other entities that have been sanctioned by the E.U. for their association with Iran's nuclear activities, including the Central Bank of Iran. SWIFT promptly terminated services for designated Iranian institutions.

The United States will continue to work closely with our European and other partners in the international community to further increase the pressure on Iran and to deepen the impact of these measures through the application of sanctions. Thank you for the opportunity to comment on this matter and for your assistance on this and other important matters of mutual interest.

Sincerely,

Adam J. Szubin
Director

Office of Foreign Assets Control

United States House of Representatives
Committee on Financial Services
Washington, DC 20515-6050

November 15, 2011

The Honorable Timothy Geithner
Secretary of the Treasury
U.S. Department of the Treasury
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

Dear Mr. Secretary:

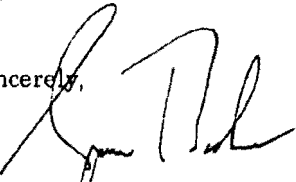
A group of constituents has contacted me regarding more than \$2 billion located in U.S. bank accounts in New York that allegedly is being held by Clearstream Banking S.A. on behalf of the government of Iran.

As you know, the money is the subject of at least one lawsuit, and several claims have been made on some or all of it. As court cases proceed, the money has been frozen since 2008 by order of the United States District Court for the Southern District of New York. It would be a disservice to the relatives of victims of the Beirut bombing if lawyers were able to remove the District Court's freeze and spirit the money out of New York.

Iran's intransigence on the issue of nuclear weapons has sparked a concerted global effort to cut it off from any funding that would allow it to pursue that goal.

The powers granted the President by the International Emergency Economic Powers Act of 1977 (IEEPA) and specifically iterated Executive Orders 13574, 13553 or 13382 give you adequate authority to block the funds in question. Therefore, please give due consideration to the request of my constituents that you seek to have the Office of Foreign Asset Control block these funds immediately, at least until all court cases are concluded and claims adjudicated.

Sincerely,



SPENCER BACHUS
Chairman

United States House of Representatives
Committee on Financial Services
Washington, D.C. 20515

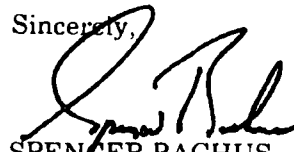
June 27, 2012

Mr. Adam J. Szubin
Director
Office of Foreign Assets Control
U.S. Department of the Treasury
Treasury Annex
1500 Pennsylvania Avenue, N.W.
Washington, DC 20220

Dear Mr. Szubin:

As a follow-up to my previous letter of November 15, 2011, regarding assets related to Clearstream that have been frozen since 2008 by order of the United States District Court for the Southern District of New York, I would also like to know if the funds have been blocked pursuant to any Executive Order not cited in my letter.

Sincerely,



SPENCER BACHUS
Chairman

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

June 27, 2012

The Honorable Spencer Bachus
Chairman
Committee on Financial Services
U.S. House of Representatives
Washington, DC 20515

Dear Chairman Bachus:

I write in response to your letter of November 15, 2011, to Secretary Geithner asking the Treasury Department to consider your constituents' request that action be taken to block, pursuant to the International Emergency Economic Powers Act of 1977 ("IEEPA"), approximately \$2 billion in funds in New York bank accounts allegedly held by Clearstream Banking S.A. on behalf of the Government of Iran. In addition I am responding to your June 15, 2012, letter asking if those assets are blocked pursuant to any Executive Order not cited in your original letter. Please accept my sincere apologies for the delay in responding to the original letter.

As you know, provisions of the National Defense Authorization Act for Fiscal Year 2012 ("NDAA"), enacted on December 31, 2011, called for the imposition of IEEPA sanctions on Iranian financial institutions and the Central Bank of Iran. On February 5, 2012, the President issued Executive Order 13599, which implemented the NDAA and also blocked all assets of the Government of Iran subject to the jurisdiction of the United States. The assets to which you refer were blocked pursuant to Executive Order 13599.

We sympathize with the victims of terrorism who seek to satisfy their judgments against the Islamic Republic of Iran and condemn the acts of violence that led to their losses. We assure you that the Department of the Treasury continues to explore all possible avenues to address our shared concerns about Iran.

Sincerely,

A handwritten signature in black ink, appearing to read "Adam J. Szubin".

Adam J. Szubin



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 7 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Hatch:

Please find enclosed the biennial report for the period October 1, 2006 – September 30, 2008, submitted under § 906(c) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

We apologize for the delay in the issuance of this report and would like to inform you that OFAC has updated its internal processes to prevent such delays from occurring in the future. We also would like to highlight that since the reporting period for this report, OFAC has issued general licenses authorizing the exportation or reexportation of most food items to Iran and Sudan. We have also automated the application process and streamlined our process to expedite review.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 7 2012

The Honorable Max Baucus
Chairman
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

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We apologize for the delay in the issuance of this report and would like to inform you that OFAC has updated its internal processes to prevent such delays from occurring in the future. We also would like to highlight that since the reporting period for this report, OFAC has issued general licenses authorizing the exportation or reexportation of most food items to Iran and Sudan. We have also automated the application process and streamlined our process to expedite review.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

**OFFICE OF FOREIGN ASSETS CONTROL
BIENNIAL REPORT OF LICENSING ACTIVITIES PURSUANT TO
THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT
ACT OF 2000**

October 2006 - September 2008

I. Overview

This report is submitted pursuant to Section 906(c) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from October 2006 through September 2008. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the specific licensing regime set forth in Section 906 of the TSRA.

There was a three percent increase in the number of license applications received during this reporting period compared to the prior period (1,794 for Oct. 2004 – Sep. 2006, 1,854 for Oct. 2006 – Sep. 2008). OFAC was able to issue licensing determinations¹ on 79.1 percent of all the license applications received during the October 2006 – September 2008 period (compared to 83.2 percent for the Oct. 2004 – Sep. 2006 period), and issued additional determinations after the two-year period ended. The average processing time for issuing licenses increased to 83 business days in this reporting period (compared to 33.1 business days in the Oct. 2004 – Sep. 2006 period), and the average time for issuing licensing determinations increased to 80 business days during the October 2006 – September 2008 reporting period versus 29.3 business days in the preceding reporting period.

The increased complexity, volume, and length of license applications (the majority of applications pertain to the export of medical devices to Iran) coupled with the more protracted scrutiny on the part of other reviewing agencies continued to affect the processing time of license applications in this reporting period (**See Graph 1**). These cases are evaluated by other agencies both in terms of whether the foreign entities involved in the transaction "promote international terrorism," as required in section 906 of the TSRA, and in terms of whether the commodities at issue implicate independent export control regimes involving chemical or biological weapons, missiles, or weapons of mass destruction as provided in section 904(2)(C) of the TSRA.

¹A licensing determination is defined as any action, either intermediate or final, that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, a telephone call, a fax, or an e-mail.

II. Program Operation

From October 1, 2006, to September 30, 2008, OFAC's Licensing Division received a total of 1,854 license applications^{2,3} pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued licensing determinations on 1,467 of the 1,854 license applications. A total of 1,290 licenses and 84 license amendments⁴ were issued from October 1, 2006, through September 30, 2008 (*See Charts 1 and 2*). On average, licenses were issued within 83 business days of receipt of the application and license amendments were issued within 28 business days of receipt of the application. In addition, OFAC issued 135 "return-without-action" letters ("RWA letters") (average turnaround: 33 business days), and 67 denial letters (average turnaround: 100 business days) (*See Graph 1*). The average number of business days for the Licensing Division to issue a licensing determination in response to submissions to OFAC on any license application under the TSRA regulations was 80 business days. The total of licenses/license amendments, RWA letters, and denial letters issued does not equal the number of license applications received because: 1) not all license applications received during this reporting period were closed in this reporting period; 2) in some instances, multiple applications from the same license applicant were combined into one license; and 3) some license applications were handled via telephone, fax, or e-mail.

As in the preceding reporting period, the preponderance of license applications submitted and licenses/license amendments issued was for Iran (*See Chart 3*). Of the 1,854 applications received, a total of 1,635 license applications (88.2 %) was for Iran, in contrast to 219 (11.8 %) for Sudan. Likewise, of the 1374 licenses/license amendments issued, 1,222 (88.9%) were issued for the sale of agricultural commodities, medicine, and medical devices to Iran, versus 152 (11.1%) for Sudan. In keeping with the program's trend, over half of the 1,854 license applications (54.3%) and almost half (49.4 %) of the licenses/license amendments were for the export of medical devices to Iran and Sudan. Of the 1,635 license applications for Iran, 560 (34.2%) were for agricultural commodities, 178 (10.9%) for medicine, and 897 (54.9%) for medical devices. Of the 1,222 licenses/license amendments issued for Iran, 467 (38.2%) were for agricultural commodities, 137 (11.2%) for medicine, and 618 (50.6%) for medical devices. The percentage breakdown of the 219 license applications for Sudan is: 84 (38.4%) for agricultural commodities, 25 (11.4%) for medicine, and 110 (50.2%) for medical devices. Of the 152 licenses/license amendments issued for Sudan, 69 (45.3%) were for agricultural commodities, 22 (14.5%) for medicine, and 61 (40.1%) for medical devices.

² OFAC received three license applications for Libya in the Oct. 2006 – Sep. 2008 period. Effective September 21, 2004, Executive Order 13357 terminated the emergency declared in Executive Order 12543 with respect to the policies and actions of the Government of Libya and revoked this and related Executive Orders. Accordingly, no OFAC license was required for exports to Libya during this reporting period. Executive Order 13357 does not, however, eliminate the need to comply with the licensing provisions of the Export Administration Regulations, 15 C.F.R. Parts 730 et seq ("EAR").

³ OFAC received 11 license applications for Syria in the Oct. 2006 – Sep. 2008 period. On December 12, 2003, President Bush signed the Syria Accountability and Lebanese Sovereignty Restoration Act ("SAA") (Public Law 108-175). On May 11, 2004, President Bush issued Executive Order 13338 to implement sections 5(a)(1), 5(a)(2)(A), and 5(a)(2)(D) of the SAA. Section 5(a)(1) of the SAA requires a prohibition on the export to Syria of all items on the United States Munitions List or the Commerce Control List. Section 5(a)(2)(A) provides authority for the President to prohibit the export or reexport to Syria of all products of the United States, with the exception of food and medicine. The result of the implementation of sections 5(a)(1) and 5(a)(2)(A) of the SAA is to restrict the export and reexport of all items subject to the EAR to Syria. The Department of Commerce's Bureau of Industry and Security is responsible for licensing exports and reexports, including food and medicine, to Syria.

⁴ A "license amendment" is an amendment to an existing license previously issued by OFAC. Some license amendment applications require interagency review, such as adding additional commodities to an existing license.

On January 9, 2007, Bank Sepah was designated under Executive Order 13382 of June 28, 2005 (70 FR 38567, July 1, 2005), "Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters." This designation blocked all property and interests in property of Bank Sepah and prohibited U.S. persons from engaging in any transaction or dealing with it. The same year, on October 25, 2007, Bank Saderat, including its branches and certain subsidiaries were designated pursuant to Executive Order 13224 of September 23, 2001, "Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten to Commit, or Support Terrorism." The same day, Bank Mellat and Bank Melli, as well as their branches and certain subsidiaries, were designated pursuant to E.O. 13382. These designations blocked all property and interests in property of Bank Saderat, Bank Mellat, and Bank Melli, and further prohibited U.S. persons from engaging in any transactions, directly or indirectly, with these banks. Further focusing on preventing the financing of such activities, another Iranian Bank, Future Bank B.S.C. and all its branches worldwide, were designated pursuant to E.O. 13382 on March 12, 2008. TSRA licensees are not authorized to engage in any transactions with these designated entities.

CHART 1
Number of License Applications and Licenses Issued by Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	644	203	1007	1854
Licenses Issued	488	149	653	1290
License Amendments Issued	48	10	26	84
Applications Denied	4	16	47	67

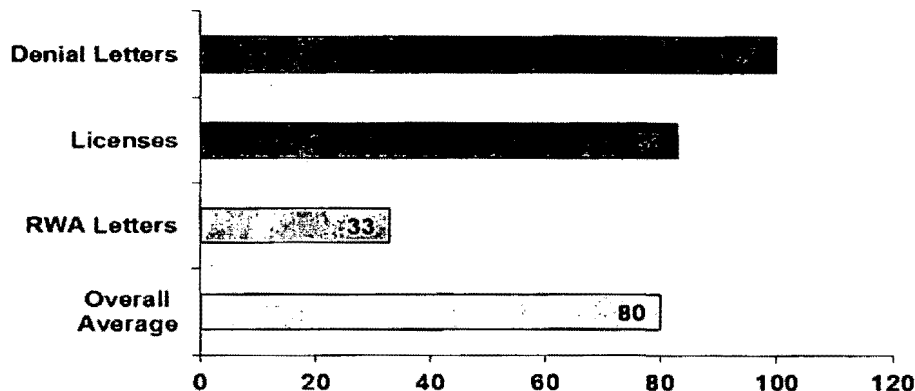
CHART 2
Number of License Applications and Licenses Issued by Country

	Iran	Sudan	TOTAL
License Applications	1635	219	1854
Licenses Issued	1145	145	1290
License Amendments Issued	77	7	84
Applications Denied	67	0	67

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	560	178	897	1635
Licenses and License Amendments Issued	467	137	618	1222
SUDAN				
License Applications	84	25	110	219
Licenses and License Amendments Issued	69	22	61	152

GRAPH 1
Average Processing Time for Issuing
Licensing Determinations (Business Days)



III. Public Comments

In accordance with Section 906(c)(5) of the TSRA, OFAC published in the *Federal Register* a request for comments on the effectiveness of OFAC's TSRA licensing procedures on November 17, 2008. For the October 2006 – September 2008 reporting period, OFAC received one set of comments submitted on behalf of four trade associations. The comments received expressed concern about the delays, developments, and trends within the licensing procedures. Among the perceived concerns that commentators requested that OFAC redress were:

- Delays in the licensing process;
- Difficulty in obtaining specific information concerning the status of pending license applications; and
- The requirement for a specific license to send product samples to Iran or Sudan.

Among the suggestions submitted for improving the licensing procedures were the following:

- Develop an electronic license application system;
- Process and issue one-year TSRA licenses on a more expedited schedule;
- Implement a streamlined system for renewals of expired licenses; and
- Provide suppliers with guidance on how they can submit samples to their customers in Iran and Sudan "without" an OFAC license or issue a general license authorizing exporters to ship small quantities of sample products.

In order to ensure the continued efficient and effective operation of the TSRA licensing procedures, OFAC will undertake a review of its licensing procedures to better meet the needs of license applicants. All comments made will be considered in the process of this review.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 7 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

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Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 7 2012

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United States Senate
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Sincerely,

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Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

OFFICE OF FOREIGN ASSETS CONTROL

REPORT OF LICENSING ACTIVITIES

PURSUANT TO

THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000

October - December 2011

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from October through December 2011. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the one-year specific licensing regime set forth in Section 906 of the TSRA.

From October 1 through December 31, 2011, OFAC's Licensing Division received a total of 398 applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued a total of 371 licensing determinations,¹ of which 145 were for cases received in this quarter. OFAC issued 184 licenses, 48 license amendments, 51 "return-without-action" letters, and 1 denial letter in this quarter. Of the total licenses issued, 173 involved products for Iran and 11 for Sudan. For more details, see Charts 1-3 and Graph 1.

On October 12, 2011, OFAC amended the Sudanese Sanctions Regulations, 31 CFR Part 538, and the Iranian Transactions Regulations, 31 CFR Part 560, by issuing general licenses that authorize the exportation or reexportation of food to Sudan and Iran, thereby removing the requirement to apply for a specific license for such exports and reexports while continuing to meet the requirements of Section 906(a)(1) of the TSRA. Certain specified food items, as well as exports to certain persons, requiring a greater level of scrutiny are excluded from the general licenses. These transactions, as well as the exportation or reexportation of agricultural commodities that do not fall within the definition of food in the general licenses, of medicine and of medical devices continue to require specific licenses. A total of 69 cases were closed pursuant to these general licenses.

CHART 1
Number of License Applications and Licenses Issued by Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	110	43	245	398
Licenses Issued	35	18	131	184
License Amendments Issued	8	4	36	48
Applications Denied	0	0	1	1

¹A "licensing determination" is any action that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, or a close-out determination.

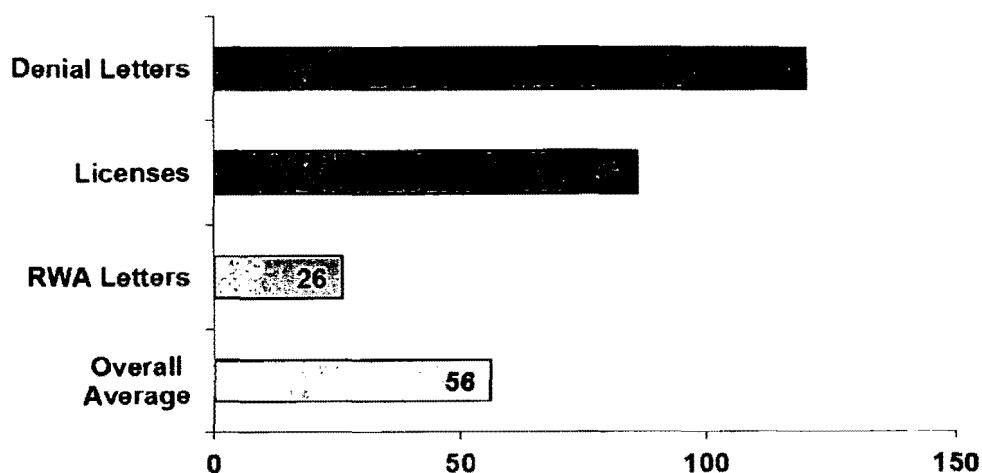
CHART 2
Number of License Applications and Licenses Issued by Country

	Iran	Sudan	TOTAL
License Applications	365	33	398
Licenses Issued	173	11	184
License Amendments Issued	44	4	48
Applications Denied	0	1	1

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	96	40	229	365
Licenses and License Amendments Issued	39	22	156	217
SUDAN				
License Applications	14	3	16	33
Licenses and License Amendments Issued	4	0	11	15

GRAPH 1
**Average Processing Time for Issuing
Licensing Determinations (Business Days)**





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 8 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Hatch:

Please find enclosed the biennial report for the period October 1, 2008 – September 30, 2010, submitted under § 906(c) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

We apologize for the delay in the issuance of this report and would like to inform you that OFAC has updated its internal processes to prevent such delays from occurring in the future. We also would like to highlight that since the reporting period for this report, OFAC has issued general licenses authorizing the exportation or reexportation of most food items to Iran and Sudan. We have also automated the application process and streamlined our process to expedite review.

Sincerely,

Adam J. Szubin

Director

Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

AUG 8 2012

The Honorable Max Baucus
Chairman
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

Please find enclosed the biennial report for the period October 1, 2008 – September 30, 2010, submitted under § 906(c) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

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Sincerely,

A handwritten signature of Adam J. Szubin is written over a horizontal line.

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

**OFFICE OF FOREIGN ASSETS CONTROL
BIENNIAL REPORT OF LICENSING ACTIVITIES PURSUANT TO
THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT
ACT OF 2000**

October 2008 - September 2010

I. Overview

This report is submitted pursuant to Section 906(c) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of TSRA from October 2008 through September 2010. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the specific licensing regime set forth in Section 906 of TSRA.

There was a 54.2 percent increase in the number of license applications received during this reporting period compared to the prior period (1,854 for Oct. 2006 – Sept. 2008, 2,859 for Oct. 2008 – Sept. 2010). OFAC was able to issue licensing determinations¹ on 76.8 percent of all the license applications received during the October 2008 – September 2010 period (compared to 79.1 percent for the Oct. 2006 – Sept. 2008 period), and issued additional determinations after the two-year period ended. The average processing time for issuing licenses increased slightly to 88 business days in this reporting period (compared to 83 days in the Oct. 2006 – Sept. 2008 period), and the average time for issuing licensing determinations decreased to 73 business days during the October 2008 – September 2010 reporting period, versus 80 business days in the preceding reporting period.

The increased complexity, volume, and length of license applications (the majority of applications pertain to the export of medical devices to Iran) coupled with the more protracted scrutiny on the part of other reviewing agencies continued to affect processing time of license applications in this reporting period (*See Graph 1*). These cases are evaluated by other agencies both in terms of whether the foreign entities involved in the transaction "promote international terrorism," as required in section 906 of the TSRA, and in terms of whether the commodities at issue implicate independent export control regimes involving chemical or biological weapons, missiles, or weapons of mass destruction as provided in section 904(2)(C) of TSRA.

II. Program Operation

From October 1, 2008 to September 30, 2010, OFAC's Licensing Division received a total of 2,859 license applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued licensing determinations on 2,198 of the 2,859 license applications. A total of 1,795

¹A licensing determination is defined as any action, either intermediate or final, that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, a telephone call, a fax, or an e-mail.

licenses and 278 license amendments²³ were issued from October 1, 2008, through September 30, 2010 (**See Charts 1 and 2**). On average, licenses were issued within 88 business days and license amendments were issued within 20 business days of receipt of the application. In addition, OFAC issued 187 "return-without-action" letters ("RWA letters") (average turnaround: 37 business days), and 25 denial letters (average turnaround: 105 business days) (**See Graph 1**). The average number of business days for the Licensing Division to issue a licensing determination in response to submissions to OFAC on any license application under the TSRA regulations was 73 business days. The total of licenses/license amendments, RWA letters, and denial letters issued does not equal the number of license applications received because: 1) not all license applications received during this reporting period were closed in this reporting period; 2) in some instances multiple applications from the same license applicant were combined into one license; and 3) some license applications were handled via telephone, fax, or e-mail.

As in the preceding reporting period, the preponderance of license applications submitted and licenses/license amendments issued was for Iran (**See Chart 3**). OFAC received a total of 2,661 license applications (93.1%) for Iran, in contrast to 198 (6.9%) for Sudan. Likewise, 1,903 licenses/license amendments (91.8%) were issued for the sale of agricultural commodities, medicine, and medical devices to Iran, versus 170 (8.2%) for Sudan. In keeping with the program's trend, over half of the 2,859 license applications (55.5%) and over half of the 2,073 licenses/license amendments (51.7%) were for the export of medical devices to Iran and Sudan. Of the 2661 license applications for Iran, 928 (34.9%) were for agricultural commodities, 225 (8.5%) for medicine, and 1508 (56.7%) for medical devices. Of the 1,903 licenses/license amendments issued for Iran, 746 (39.2%) were for agricultural commodities, 150 (7.9%) for medicine, and 1,007 (52.9%) for medical devices. The percentage breakdown of the 198 license applications for Sudan is: 100 (50.5%) for agricultural commodities, 20 (10.1%) for medicine, and 78 (39.4%) for medical devices. Of the 170 licenses/license amendments issued for Sudan, 95 (55.9%) were for agricultural commodities, 11 (6.5%) for medicine, and 64 (37.6%) for medical devices.

On October 22, 2008, the Export Development Bank of Iran and certain additional entities were designated pursuant to Executive Order 13382 of June 28, 2005, "Blocking Property of Weapons of Mass Destruction Proliferators and Their Supporters." On June 16, 2010, Iran Overseas Investment Bank Limited and additional entities were designated pursuant to Executive Order 13224 of September 23, 2001, "Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten to Commit, or Support Terrorism." That same day, Post Bank of Iran was also designated pursuant to Executive Order 13382. Shortly after, on September 7, 2010, Europaisch-Iranische Handelsbank was designated pursuant to Executive Order 13382. These designations blocked all property and interests in property of those persons that were added to OFAC's Specially Designated Nationals and Blocked Persons list, as well as any entity in which any such person owns, directly or indirectly, a 50% or greater interest, and further prohibited U.S. persons from engaging in any transactions, directly or

² A "license amendment" is an amendment to an existing license previously issued by OFAC. Some license amendment applications require interagency review, such as adding additional commodities to an existing license.

³ OFAC received 7 license applications for Syria in the Oct. 2008 – Sept. 2010 period. On December 12, 2003, President Bush signed the Syria Accountability and Lebanese Sovereignty Restoration Act ("SAA") (Public Law 108-175). On May 11, 2004, President Bush issued Executive Order 13338 to implement §§ 5(a)(1), 5(a)(2)(A), and 5(a)(2)(D) of the SAA. Section 5(a)(1) of the SAA requires a prohibition on the export to Syria of all items on the Commerce Control List. Section 5(a)(2)(A) prohibits the export or reexport to Syria of all products of the United States, with the exception of food and medicine. The result of the implementation of §§ 5(a)(1) and 5(a)(2)(A) of the SAA is to restrict the export and reexport of all items subject to the Export Administration Regulations to Syria. The Department of Commerce's Bureau of Industry and Security is responsible for licensing exports and reexports, including food and medicine, to Syria.

indirectly with such persons. TSRA licensees are not authorized to engage in any transactions with these designated entities.

In order to address the concerns raised in the public comments for the October 2006 – September 2008 reporting period, OFAC updated on November 3, 2008, its guidelines for submitting TSRA applications and also posted guidance on the export or reexport of replacement parts to Iran or Sudan pursuant to TSRA on October 7, 2009.

OFAC amended the Sudanese Sanctions Regulations on September 9, 2009, by issuing a general license that authorizes the exportation or reexportation of agricultural commodities, medicine, and medical devices to the Specified Areas of Sudan, as well as the conduct of related transactions, provided that certain conditions are met. 74 Fed. Reg. 46361 (Sept. 9, 2009). The Specified Areas of Sudan are defined as Southern Sudan (now the Republic of South Sudan), Southern Kordofan/Nuba Mountains State, Blue Nile State, Abyei, Darfur, and marginalized areas in and around Khartoum. 31 C.F.R. § 538.320.

CHART 1
Number of License Applications and Licenses Issued by Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	1028	245	1586	2859
Licenses Issued	716	140	939	1795
License Amendments Issued	125	21	132	278
Applications Denied	4	5	16	25

CHART 2
Number of License Applications and Licenses Issued by Country

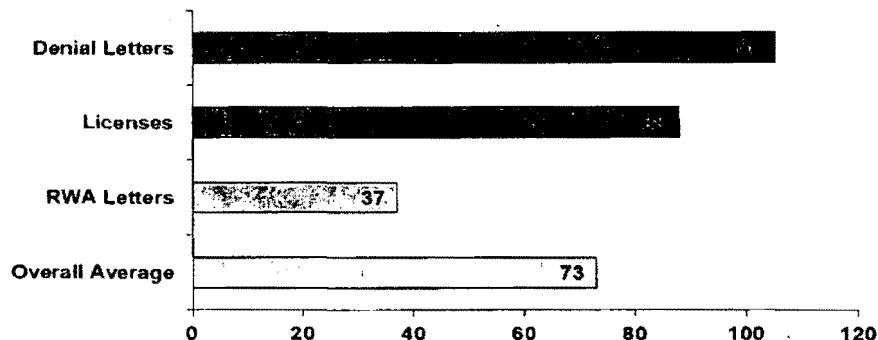
	Iran	Sudan	TOTAL
License Applications	2661	198	2859
Licenses Issued	1634	161	1795
License Amendments Issued	269	9	278
Applications Denied	24	1	25

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	928	225	1508	2661
Licenses and License Amendments Issued	746	150	1007	1903
SUDAN				
License Applications	100	20	78	198
Licenses and License Amendments Issued	95	11	64	170

GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**



III. Public Comments

In accordance with Section 906(c)(5) of the TSRA, OFAC published in the *Federal Register* a request for comments on the effectiveness of OFAC's TSRA licensing procedures on April 21, 2011. For the October 2008 – September 2010 reporting period, OFAC received three (3) comments, two (2) from trade associations and one (1) from a private company. All the comments received expressed concern about the delays, developments, and trends within the licensing procedures.

Among the perceived concerns that commentators requested that OFAC redress were:

- The need for more outreach by OFAC with the business community;
- The need for certain enhancements to the TSRA online application system and for a streamlined process for servicing previously licensed medical devices;
- Delays in the licensing process;
- Broadening the scope of activities considered authorized as "ordinarily incident" to issued licenses;
- Difficulty in obtaining meaningful information concerning the status of pending license applications and clarification concerning the scope of licenses that have been issued;
- Failure to issue required biennial reports to Congress in a timely fashion and to publish quarterly reports on OFAC's web site; and
- Difficulty of securing third country financing for a licensed export to Iran.

Among the suggestions submitted for improving the licensing procedures were the following:

- Process and issue one-year TSRA licenses on a more expedited schedule possibly through an established maximum review period;
- OFAC should be granted more resources to license application processing;
- Enhance the online application process;
- Issue a general license for the export of replacement parts for medical devices previously exported pursuant to an OFAC license;

- Examine process and procedures relating to the renewal of previously issued licenses;
- Develop and implement an industry outreach type of program;
- Issue a statement of licensing policy regarding agricultural exports to Iran and corresponding payments processed by third country financial institutions; and
- Publish quarterly TSRA reports on OFAC's web site.

In order to ensure the continued efficient and effective operation of the TSRA licensing procedures, OFAC is undertaking a review of its licensing procedures to better meet the needs of license applicants. All comments made will be considered in the process of this review.



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OCT 4 2012

The Honorable Max Baucus
Chairman
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Baucus:

Please find enclosed the quarterly report for the period January 1 – March 31, 2012, submitted under § 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the one-year licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

On October 12, 2011, OFAC amended the Sudanese Sanctions Regulations, 31 CFR Part 538, and the Iranian Transactions Regulations, 31 CFR part 560, by issuing general licenses that authorize the exportation or reexportation of food to individuals and entities in an area of Sudan other than the Specified Areas of Sudan and in Iran. Certain specified food items, as well as exports to certain persons, requiring a greater level of scrutiny are excluded from the general licenses.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OCT 4 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

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On October 12, 2011, OFAC amended the Sudanese Sanctions Regulations, 31 CFR Part 538, and the Iranian Transactions Regulations, 31 CFR part 560, by issuing general licenses that authorize the exportation or reexportation of food to individuals and entities in an area of Sudan other than the Specified Areas of Sudan and in Iran. Certain specified food items, as well as exports to certain persons, requiring a greater level of scrutiny are excluded from the general licenses.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

OFFICE OF FOREIGN ASSETS CONTROL

REPORT OF LICENSING ACTIVITIES

PURSUANT TO

THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT ACT OF 2000

January - March 2012

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from January through March 2012. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the one-year specific licensing regime set forth in Section 906 of the TSRA.

From January 1 through March 31, 2012, OFAC's Licensing Division received a total of 226 applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued a total of 326 licensing determinations,¹ of which 125 were for cases received in this quarter. OFAC issued 189 licenses, 36 license amendments, 49 "return-without-action" letters, and no denial letters in this quarter. Of the total licenses issued, 156 involved products for Iran and 33 for Sudan. For more details, see Charts 1-3 and Graph 1.

CHART 1

Number of License Applications and Licenses Issued by Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	20	21	185	226
Licenses Issued	53	25	111	189
License Amendments Issued	14	3	19	36
Applications Denied	0	0	0	0

CHART 2

Number of License Applications and Licenses Issued by Country

	Iran	Sudan	TOTAL
License Applications	206	20	226
Licenses Issued	156	33	189
License Amendments Issued	31	5	36
Applications Denied	0	0	0

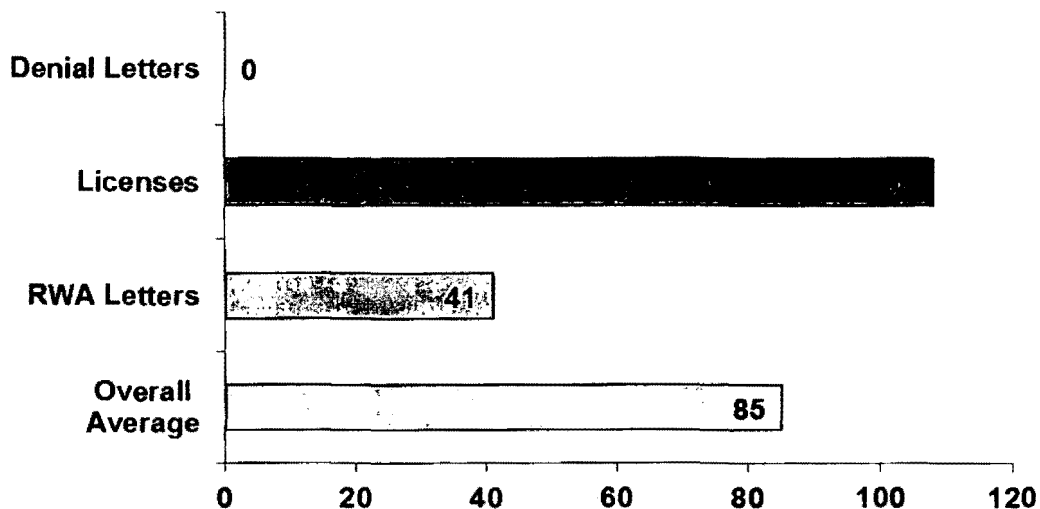
¹A "licensing determination" is any action that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, or a close-out determination.

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	14	17	175	206
Licenses and License Amendments Issued	56	22	109	187
SUDAN				
License Applications	6	4	10	20
Licenses and License Amendments Issued	11	6	21	38

GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OCT 4 2012

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Hatch:

Please find enclosed the quarterly report for the period April 1 – June 30, 2012, submitted under § 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 (the "Act"). The report discusses activities undertaken by the Department of the Treasury's Office of Foreign Assets Control in the administration of the one-year licensing regime set forth in § 906(a)(1) of the Act with respect to the exportation of agricultural commodities, medicine, and medical devices to Iran and Sudan.

Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

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Sincerely,

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Director
Office of Foreign Assets Control

Enclosure

**OFFICE OF FOREIGN ASSETS CONTROL
REPORT OF LICENSING ACTIVITIES
PURSUANT TO
THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT
ACT OF 2000**

April - June 2012

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from April through June 2012. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the one-year specific licensing regime set forth in Section 906 of the TSRA.

From April 1 through June 30, 2012, OFAC's Licensing Division received a total of 371 applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued a total of 536 licensing determinations,¹ of which 207 were for cases received in this quarter. OFAC issued 328 licenses, 79 license amendments, 44 "return-without-action" letters, and one denial letter in this quarter. Of the total licenses issued, 305 involved products for Iran and 23 for Sudan. For more details, see Charts 1-3 and Graph 1.

**CHART 1
Number of License Applications and Licenses Issued by Product**

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	76	30	265	371
Licenses Issued	53	30	245	328
License Amendments Issued	16	4	59	79
Applications Denied	0	1	0	1

**CHART 2
Number of License Applications and Licenses Issued by Country**

	Iran	Sudan	TOTAL
License Applications	339	32	371
Licenses Issued	305	23	328
License Amendments Issued	74	5	79
Applications Denied	1	0	1

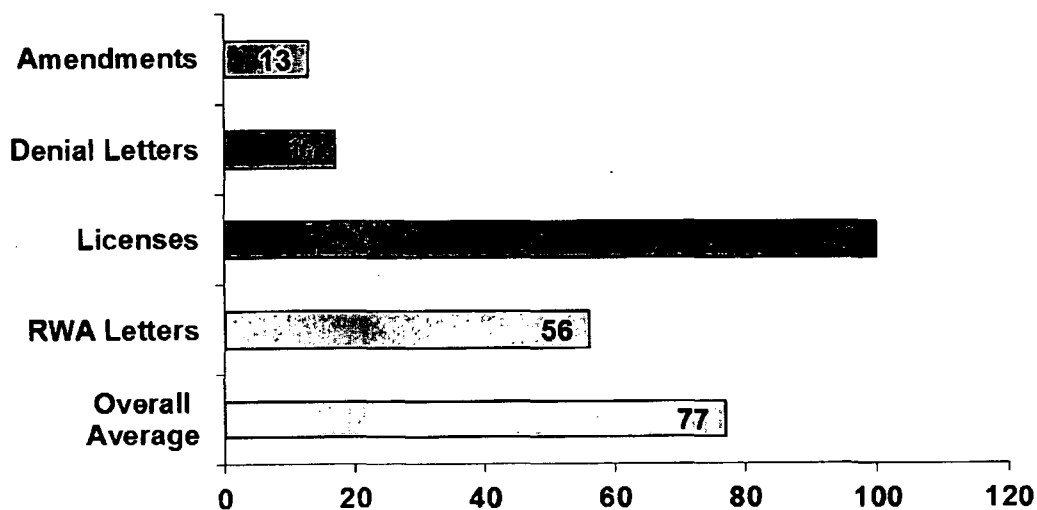
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CHART 3**Number of License Applications and Licenses Issued by Country and Product**

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License Applications	68	24	247	339
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License Applications	8	6	18	32
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GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OCT 4 2012

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Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

**OFFICE OF FOREIGN ASSETS CONTROL
REPORT OF LICENSING ACTIVITIES
PURSUANT TO
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ACT OF 2000**

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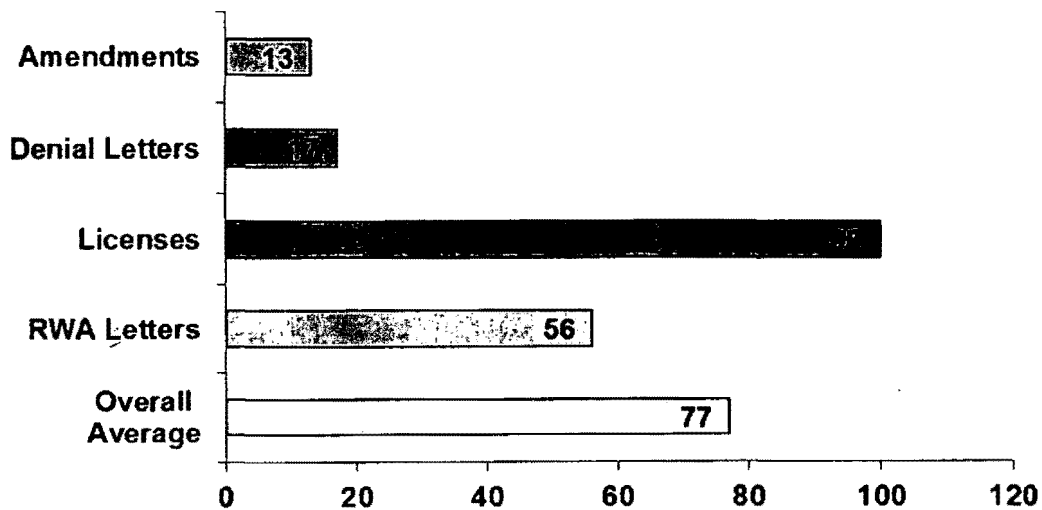
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GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**





DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

JAN 22 2013

The Honorable Orrin G. Hatch
Ranking Member
Committee on Finance
United States Senate
Washington, D.C. 20510

Dear Senator Hatch:

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Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

JAN 22 2013

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Sincerely,

Adam J. Szubin
Director
Office of Foreign Assets Control

Enclosure

**OFFICE OF FOREIGN ASSETS CONTROL
REPORT OF LICENSING ACTIVITIES
PURSUANT TO
THE TRADE SANCTIONS REFORM AND EXPORT ENHANCEMENT
ACT OF 2000**

July - September 2012

This report is submitted pursuant to Section 906(b) of the Trade Sanctions Reform and Export Enhancement Act of 2000 ("TSRA") and covers activities undertaken by the Treasury Department's Office of Foreign Assets Control ("OFAC") under Section 906(a)(1) of the TSRA from July through September 2012. Under the procedures established in its TSRA-related regulations, OFAC processes license applications requesting authorization to export agricultural commodities, medicine, and medical devices to Iran and Sudan under the specific licensing regime set forth in Section 906 of the TSRA.

From July 1 through September 30, 2012, OFAC's Licensing Division received a total of 423 applications pursuant to Section 906(a)(1) of the TSRA. During this period, OFAC issued a total of 495 licensing determinations,¹ of which 230 were for cases received in this quarter. OFAC issued 321 licenses, 74 license amendments, 41 "return-without-action" letters, and no denial letters in this quarter. Of the total licenses issued, 294 involved products for Iran and 27 for Sudan. For more details, see Charts 1-3 and Graph 1.

**CHART 1
Number of License Applications and Licenses Issued by Product**

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
License Applications	77	39	307	423
Licenses Issued	36	31	254	321
License Amendments Issued	16	5	53	74
Applications Denied	0	0	0	0

**CHART 2
Number of License Applications and Licenses Issued by Country**

	Iran	Sudan	TOTAL
License Applications	383	40	423
Licenses Issued	294	27	321
License Amendments Issued	70	4	74
Applications Denied	0	0	0

¹A "licensing determination" is any action that OFAC takes on a license application. It may take the form of a license, a license amendment, a "return-without-action" letter, a general information letter, an interpretative letter, a denial letter, or a close-out determination.

CHART 3
Number of License Applications and Licenses Issued by Country and Product

	Agricultural Commodities	Medicine	Medical Devices	TOTAL
IRAN				
License Applications	69	30	284	383
Licenses and License Amendments Issued	49	30	285	364
SUDAN				
License Applications	8	9	23	40
Licenses and License Amendments Issued	3	6	22	31

GRAPH 1

**Average Processing Time for Issuing
Licensing Determinations (Business Days)**

