TRANSPARENCY INTERNATIONAL U.S.
fighting corruption, promoting democracy

Transparency International U.S.
1100 13th St NW
Suite 800
Washington, DC 20005
Tel: +1 (614) 668-0258
info-us@transparency.org
us.transparency.org

August 14, 2026

The Honorable Thomas G. DiNanno
Under Secretary of State for Arms Control and International Security
U.S. Department of State
2201 C Street NW
Washington, DC 20520

Re: Comments on International Traffic in Arms Regulations (ITAR): Part 130 Changes to Reduce Reporting Burden, RIN 1400-AF94, Public Notice 13021, Docket No. DOS-2026-0562

Dear Under Secretary DiNanno:

Transparency International U.S. (TI US) welcomes the opportunity to comment on the Department of State's proposed revisions to Part 130 of the International Traffic in Arms Regulations.[1] TI US is part of the world's largest global coalition dedicated to fighting corruption. With more than 100 national chapters worldwide, Transparency International (TI) works with citizens, governments, and the private sector to promote transparency and accountability, strengthen the rule of law, and curb the abuse of power in all its forms.

In January 2026, TI US submitted comments on the underlying information collection recommending that the Department move Part 130 reporting away from a transaction-by-transaction basis to a periodic reporting cycle, develop an electronic form for those reports, and use the resulting submissions to build an integrated system for flagging risky payments.[2] We appreciate that the proposed rule adopts some of these concepts.

We support the push for detailed, accurate, and comparable information in the electronic form to assist the State Department in identifying questionable payments. These include distinct fields in the electronic form separating amounts paid from amounts offered or agreed to be paid; allowing registrants to indicate repeating entries, which should reduce the duplicate reporting of recurring payments across multiple sales; including the total contract price of the sale to the foreign purchaser as well as a DDTC authorization number or Department of Defense contract or case number; collecting the end-item associated with the sale and employer and title; and requiring in proposed § 130.10(a) and (e)

[1] U.S. Department of State, "International Traffic in Arms Regulations (ITAR): Part 130 Changes to Reduce Reporting Burden," 91 Fed. Reg. 35926 (June 15, 2026).

[2] Letter from Colby Goodman, Transparency International U.S., to Michael J. Vaccaro, Deputy Assistant Secretary for Defense Trade Controls, "Updated Comments on Political Contributions, Fees, and Commissions Relating to Sales of Defense Articles and Defense Services, OMB Control Number 1405-0025" (Jan. 12, 2026).

that reports be signed and certified as complete and accurate by a senior officer. Each of these improves the quality of the information the Department receives and its usefulness for the reporting Congress requires under Section 36(a) of the Arms Export Control Act (AECA).

Our January comments recommended periodic reporting subject to three conditions: that the reports continue to include all information currently required under Part 130; that the Department review them both independently and in connection with export license requests; and that they be frequent enough to provide timely and effective visibility into concerning payments. The proposed rule adopts the reporting mechanism but not all those conditions. The four recommendations below would restore them largely within the framework the Department has proposed. Each is additive rather than a departure from the rule, and each imposes little or no additional burden on industry — in most cases because it asks companies to report determinations that they are already required to make.

In brief, we recommend that the Department:

- **Report the purpose of each payment.** Require registrants to state, for each payment and each offer or agreement to pay, what was furnished in consideration, how the amount was determined, and whether it is contingent on the sale, through a new § 130.10(a)(4)(vi).
- **Keep recipients named when payments are aggregated.** Revise § 130.10(c) so that aggregating small payments relieves a registrant of itemizing them individually but not of identifying who received them. The Department can adopt its own proposed thresholds and still do this.
- **Keep vendor reporting simultaneous.** Retain the requirement in § 130.12(c) that a vendor furnishing an abbreviated statement report in full to DDTC at the same time, so that the aggregate figure and the underlying detail remain matchable.
- **Screen the submissions systematically.** Develop a standard procedure for screening Part 130 reports against the various control lists and red flags, and report on its results to Congress alongside the payment information already furnished under § 130.17(a).

Each recommendation is additive to the framework the Department has proposed rather than a departure from it, and none would meaningfully increase the burden the Department has estimated. The remainder of this letter sets out the basis for each.

Why Part 130 Reporting Matters

Congress added these reporting requirements in the late 1970s in response to investigations into payments made by U.S. companies, frequently through brokers, to foreign military, political, and royal officials and to political parties in order to secure and maintain sales abroad.[3] Those investigations linked such payments to the fall of allied governments, the expropriation of U.S. company property, and the strengthening of political forces hostile to U.S. interests. Recognizing that defense procurement decisions are often made in secret to protect national security, Congress gave the Executive Branch wide

[3] Defense Trade Advisory Group, Part 130 Relook, Working Group 3 White Paper (Washington, DC: U.S. Department of State, May 2020), 8–11.

latitude under AECA Section 39 to require reporting on these payments, and the Department implemented that authority through Part 130.

Those risks have not diminished. In a Transparency International review of more than 70 major arms deals involving alleged or actual corruption over the past three decades, foreign brokers and consultants were regularly involved in illicit or questionable payment schemes.[4] The consequences documented across those cases include distorted competition, procurement of faulty or inappropriate weapons, crippled defense budgets, arms diversion, and cancelled contracts. In India, brokers allegedly bribed military officials on behalf of AgustaWestland to rig the purchase of twelve transport helicopters; the aircraft ultimately could not fly at the altitudes required for missions in the Himalayas.[5] These types of corruption can harm U.S. interests directly. They can degrade partner capability, and they can disadvantage U.S. companies competing honestly, as happened in the fighter aircraft competitions in the Czech Republic and Hungary.[6]

Corrupt payments to intermediaries also defeat the documentary controls on which arms transfer oversight depends. An indictment returned in the Eastern District of Virginia in April 2025 alleges that a Bulgaria-based arms trafficker and three East African associates, including a Ugandan government official, conspired to supply military-grade weaponry to the Cartel de Jalisco Nueva Generación in Mexico, a U.S. designated foreign terrorist organization.[7] According to the indictment, the associates were allegedly paid approximately $35,000 to corruptly obtain an end-user certificate from Tanzania's Ministry of Defence and National Services authorizing importation of 50 AK-47 rifles for the sole use of the Tanzanian military, and certifying that the weapons would be neither re-exported nor delivered to any third party without the written consent of the government of Bulgaria. The rifles, magazines, and ammunition were in fact exported from Bulgaria in July 2024 intended for the cartel.

What makes Part 130 reporting valuable is that the information it collects corresponds closely to the risk indicators that recur across these types of cases. Some of the corruption risk indicators associated with agents and intermediaries were: the use of intermediaries connected to politically exposed persons (19 of more than 70 cases); large payments to intermediaries not corresponding to a work product, including no-work contracts, work product not meriting the fees paid, and fees calculated as a percentage of contract value rather than for specific services (19 cases); intermediaries with a history of misconduct, including past suspicions of corruption (10 cases); and intermediaries displaying the characteristics of shell companies, such as establishment shortly before the transaction, few employees, or a post office box address (6 cases).

[4]Transparency International has collected and analyzed more than 70 cases of corruption involving major weapons platforms worldwide. Many of these cases are available at Corruption Tracker, https://corruption-tracker.org/. Incidence figures cited in this letter are drawn from that case collection.

[5]Colby Goodman, Blissfully Blind: The new US push for defense industrial collaboration with partner countries and its corruption risks (Washington, DC: Transparency International U.S. and Defence & Security, 2024), 23.

[6]Nelson D. Schwartz and Lowell Bergman, “Payload: Taking Aim at Corporate Bribery,” New York Times, November 25, 2007.

[7]Indictment, United States v. Mirchev, No. 1:25-CR-102 (AJT) (E.D. Va. filed Apr. 10, 2025). The allegations described here are those of the grand jury and have not been proven at trial.

Three of these four are screenable from information § 130.10 already requires, at least for payments large enough to escape the aggregation rule discussed in our second recommendation: recipient name, nationality, address and principal place of business, employer and title, and relationship to the applicant, supplier, vendor, foreign purchaser, or end-user. The fourth — whether a payment corresponds to services actually furnished — is the subject of our first recommendation below.

These functions are not a theoretical capability. Over the past two decades the Department has identified instances in which U.S. and foreign defense companies failed to report or falsely reported payments, and those findings supported enforcement actions and related investigations involving conduct in the Czech Republic, Ghana, Hungary, Japan, Qatar, Saudi Arabia, and Sri Lanka.[8] Part 130 reports have also been used to identify mismatches between the intermediaries named in a report and the parties named on the associated authorization. That capability matters more today than it did a decade ago: since the Department narrowed the definition of foreign broker for registration purposes in 2013, many foreign intermediaries involved in arms transfers no longer register with DDTC, and Part 130 reports are frequently the only place their names appear in the Department's holdings.[9]

Recommendation 1: Require Reporting on the Purpose and Basis of Each Payment

The proposed rule's separation of amounts paid from amounts offered or agreed to be paid is a significant accuracy improvement, and it implements the distinction the Defense Trade Advisory Group (DTAG) recommended between payments made and payments offered or agreed to but not yet paid.[10] **What the proposed form does not capture is the purpose of a payment**. Reports identify recipients and amounts, but not what, if anything, was furnished in return, or how the amount was determined. This limits the ability of the Department and of Congress to assess whether a payment was legitimate. Establishing that a payment was not tied to any particular service — and was instead simply understood to be necessary to win the sale — is a clear red flag indicator. It is also the most frequent intermediary indicator in our case review, appearing in 19 of more than 70 cases in the form of no-work contracts, work product not meriting the fees paid, and fees calculated as a percentage of contract value rather than for identifiable services.

The April 2025 indictment described above illustrates the pattern directly. At a later meeting in London in April 2024, one of the defendants who had helped obtain the Tanzanian certificate — a serving policy advisor employed by the Government of Uganda, previously a deputy head of mission for the Uganda High Commission — is alleged to have offered to use his connections throughout Africa and within the Ugandan government to obtain end-user certificates for future arms deals in exchange for a two percent

[8] See charging letters and consent agreements published by the Directorate of Defense Trade Controls, https://www.pmddtc.state.gov/.

[9] In 2013 the Department narrowed the definition of foreign person subject to broker registration to those owned or controlled by U.S. persons. See 22 C.F.R. part 129. As a result, many foreign intermediaries involved in arms transfers are not required to register with DDTC.

[10] Defense Trade Advisory Group, Annual Part 130 Reporting Forms, Working Group 3 White Paper (Washington, DC: U.S. Department of State, October 22, 2020), 8–11.

commission. [11] The compensation is denominated as a share of transaction value; what is furnished is access to officials across several governments. A reporting field that asked what was furnished in consideration, how the amount was determined, and whether it was contingent on the conclusion of the sale would capture precisely that arrangement.

Critically, companies must already identify the purpose of payments to fulfill this reporting requirement, and they have been required to do so for a long time. The exclusion now at § 130.5(b)(4), which the proposed rule would redesignate as § 130.6(b)(4) without altering its text, removes from the definition of “fee or commission” any payment made solely for the purchase by an applicant, supplier, or vendor of specific goods or technical, operational, or advisory services where the amount is not disproportionate to the value of what was actually furnished. Determining whether a payment is reportable at all therefore requires a company to establish what services were furnished and to assess whether the amount was proportionate to them. The exclusion at § 130.5(b)(2), likewise carried forward unchanged, excludes normal salary but expressly carves out contingent compensation, treating contingency as material to the analysis. These determinations have been required since 1976. The form has simply never asked for their result.

These determinations are worth collecting for a reason beyond convenience. Because the § 130.5(b)(4) assessment is made by the company before anything is filed, a payment the company judges to be a proportionate purchase of services does not become a reportable fee or commission, does not count toward the aggregate thresholds in § 130.9, and never reaches the Department in any form. The Department’s visibility into how that judgment is being exercised is therefore limited to the payments a company has already concluded fall outside the exclusion. A field recording the purpose of each amount, how it was determined, and what it depends upon would give the Department its first structured view of that reasoning across registrants and over time.

We note in this connection that DTAG has twice asked the Department to clarify the technical, operational, and advisory services exclusion in § 130.5(b)(4), first among its May 2020 recommendations and again in November 2022.[12] That request reflects genuine uncertainty within industry about where the boundary of the exclusion lies. Collecting the purpose, basis, and contingency of each payment would not redraw that boundary. It would, however, allow the Department to see how registrants are applying it across submissions and over time, which is a prerequisite to clarifying it well.

We recommend that the Department require reporting of the purpose of each payment and of each offer or agreement to pay, by adding a new § 130.10(a)(4)(vi):

> *(vi) The purpose of each such amount, including the specific goods or services, if any, furnished or to be furnished in consideration for it; the basis on which the amount was or*

[11] Mirchev Indictment, supra note 7.

[12] Defense Trade Advisory Group, ITAR Part 130 Reporting, Working Group 1 White Paper (Washington, DC: U.S. Department of State, November 9, 2022), 4, summarizing the recommendations of the May 2020 Working Group 3 white paper, supra note 3.

is to be determined; and whether the amount is contingent, in whole or in part, upon the conclusion of the sale or upon any other condition.

On the electronic form, this can be implemented as a short purpose field, a selection for the basis of compensation, and a contingency flag, applied to entries in both the table of payments made and the table of offers and agreements. We would emphasize that the basis element is intended as a selection from a short list — fixed fee, hourly or time-based, percentage of contract value with the percentage stated, contingent upon award, or other — rather than a narrative explanation of pricing. A company necessarily knows which category applies, because it negotiated the arrangement. Structured in this way, the information would be screenable rather than narrative, and it would respond directly to the Department's question whether the proposed changes will produce a more precise and accurate accounting of covered payments.

This requirement should apply to retainers and to other payments not tied to identifiable deliverables. General retainers spanning multiple authorizations are among the arrangements our case review most often associates with corruption risk. They should be reported with a clear statement of what the retainer covers and how it was calculated, rather than excluded from Part 130 or allocated across authorizations without explanation.

Recommendation 2: Preserve Recipient Identity in Aggregated Entries

The miscellaneous payment thresholds in § 130.10(c) do not determine whether a payment is reported, but whether the Department learns who received it. Payments at or below them are disclosed only as an aggregate figure labeled miscellaneous, without the recipient's name, nationality, address, employer, title, or relationship to the foreign purchaser or end-user. The proposed rule would double both — from $2,500 to $5,000 for political contributions and from $50,000 to $100,000 for fees or commissions.

In the April 2025 indictment described above, the payments alleged to have secured the fraudulent Tanzanian end-user certificate totaled approximately $35,000, wired from accounts in the United States to a Kenyan bank account in October and December 2022. [13] The charges in that case concerned drug trafficking and material support to a terrorist organization, and the transaction would not have been covered by Part 130. The figure is nonetheless instructive, because it falls below the $50,000 miscellaneous threshold in force today, not merely below the $100,000 proposed. Had a report been due, the recipient would have appeared only as an unnamed line reading "miscellaneous fees or commissions." The Department would have learned that money was paid and nothing about who received it. That is the defect worth correcting.

The difficulty lies less in where those figures are set than in what § 130.10(c) suppresses. The provision bundles two very different categories of information. The first is the identity of the recipient, as specified in § 130.10(b)(2). The second is the transactional detail of each individual payment: its amount, its date, who paid it, and whether it was made in cash or in kind.

[13] Mirchev Indictment, supra note 7.

Both carry real value. Recipient identity is what every screening technique depends upon, and it costs a registrant almost nothing to report. Because the definitions in proposed §§ 130.5 and 130.6 reach any payment of $1,000 or more, a company must already identify and attribute every such payment to determine whether it has crossed the aggregate thresholds, and it must obtain full disclosure from its vendors under § 130.12(a) and from fee recipients under § 130.13. Per-payment detail is valuable for different reasons: dates and amounts can reveal payments timed to procurement milestones, sequences structured to remain below reporting figures, and patterns a single aggregate conceals. But the two differ in cost. Itemizing every small payment individually consumes time; naming the recipient does not. Section 130.10(c) discards both together and so makes the trade in the wrong direction. DTAG was explicit in recommending annual reporting that the resulting savings to industry "do not come as a result of less transparency or disclosure." Section 130.10(c) as proposed takes the savings from disclosure.

This matters most where amounts are smallest. Payments to foreign officials, whether gifts, hospitality, or cash, are political contributions under proposed § 130.5, and are frequently small when taken individually. Because proposed § 130.9(e) attributes to the applicant contributions made by or at the direction of anyone it has paid a fee or commission, the officials at the center of a scheme are typically reached through the contribution provisions, where identity surfaces only above the § 130.10(c)(1) figure. The Department's ability under proposed § 130.11(a)(2) to request further detail does not cure this, since it can request detail only where it already has reason for concern, and an aggregate figure with no name attached supplies none.

We recommend accordingly that § 130.10(c) be revised so that aggregation relieves a registrant of itemizing individual payments but not of identifying their recipients or stating what each was paid for. Whatever view the Department takes of the threshold figures, it could adopt its own proposed numbers and still achieve this, and it would obtain for the first time a complete roster of the intermediaries and officials receiving covered payments in connection with U.S. defense sales. We suggest the following:

> *(c) Payments that may be reported in aggregate. In submitting a report required by § 130.9, the information specified in paragraphs (a)(4)(i) through (iv),* ***(a)(4)(vi),*** *and (b)(1) of this section need not be provided separately for each payment if the payments do not exceed: (1) $5,000 in the case of political contributions; and (2) $100,000 in the case of fees or commissions. In lieu of separate reporting, the aggregate amount and the number of such payments must be reported, identified as miscellaneous political contributions or miscellaneous fees or commissions, together with the information specified in* ***paragraphs (a)(4)(vi) and*** *(b)(2) of this section for each recipient.*

If the Department declines to separate recipient identity from itemization, we recommend in the alternative that the thresholds in § 130.10(c)(1) and (c)(2) be retained at $2,500 and $50,000. The inflation analysis supporting the increase in the value threshold does not extend to these figures, and DTAG's own recommendations for substantive amendment of Part 130 did not include raising them.[14]

[14] DTAG, Part 130 Relook, supra note 3, at 14–16; DTAG, ITAR Part 130 Reporting, supra note 12, at 4.

Recommendation 3: Retain Simultaneous Vendor Reporting Under § 130.12(c)

Under the current § 130.12(c), a vendor that believes disclosure to an applicant or supplier would unreasonably risk injury to its commercial interests may furnish an abbreviated statement showing only aggregate amounts. It may do so on the condition that it certifies the information has been reported directly to DDTC and that it reports fully to DDTC simultaneously.

The proposed revision changes that certification from information that has been reported to information that will be reported, and it moves the vendor's direct report to the time of the vendor's own registration renewal, or to September 30 where the vendor is not registered. The preamble describes this as revising the paragraph to reflect the annual submission process.

We believe the effect is more substantial than that description conveys. The requirement of simultaneity is what currently keeps a vendor's detailed disclosure connected to the applicant's report of the same sale. Because registration renewal dates differ between an applicant and its vendors, removing it means the aggregate figure and the underlying detail may reach the Department in separate submissions, under separate registrant records, months apart, and covering different reporting periods. An applicant whose registration renews in October and a vendor whose registration renews the following March would file five months apart. A payment made shortly after the vendor's previous renewal could reach the Department more than a year after it was made.

We note the acknowledgment in industry comments on this rule that where vendors incur contingent fees embedded in the contractual work they perform for an applicant, the applicant may never have adequate visibility into those amounts. We agree, and it is precisely the reason the vendor's direct report to the Department should not be deferred. Where the applicant cannot see the detail, the Department must receive it promptly and in a form that can be matched to the applicant's submission.

We therefore recommend that § 130.12(c) retain the requirement that a vendor report fully to DDTC simultaneously with furnishing an abbreviated statement to the applicant or supplier. In the alternative, we recommend that the vendor's direct report be due within 30 days of the applicant's or supplier's annual submission. We do not object to extending the vendor response period in § 130.12(b) from 20 to 30 days, which is a reasonable accommodation to the longer reporting cycle.

We further note that § 130.13, which requires recipients of fees or commissions to disclose their political contributions upstream, is not amended by this rule. With §§ 130.9, 130.11, and 130.12 all moving to annual cycles, the disclosure chain running from fee recipient to vendor to applicant to the Department would no longer have synchronized timing at any point. We would welcome clarification as to whether this is among the minor changes to Part 130 the preamble indicates will be addressed in a future rulemaking.

Recommendation 4: Develop a Standard Procedure for Screening Part 130 Submissions

The Department's stated rationale for standardizing submissions is that inconsistent formatting currently requires extensive manual review to produce the information required for AECA Section 36(a) reporting. Standardization solves that problem, and it also creates something that has not previously existed: a structured, machine-readable record of payments, recipients, and associated authorizations that can be screened systematically rather than read individually. DTAG anticipated as much, identifying among the advantages of annual reporting that an official or investigator could review a single consolidated submission rather than examining multiple license applications to establish what was paid to a given sales representative and when.[15] Realizing that advantage requires that someone conduct the review, and do so systematically.

Our January comments recommended that the Department develop an integrated system for flagging risky payments and compare submissions against its Watch List and broker registrations. We renew that recommendation and offer greater specificity. We recommend that DDTC develop a documented standard operating procedure for screening Part 130 submissions that includes items such as those below. We would be happy to provide a fuller list of red flags to consider.

- automated screening of each named recipient against the Department's Watch List, Part 129 broker registrations, the Debarred and Statutorily Debarred Parties lists, the OFAC Specially Designated Nationals list, and the Entity List;
- screening of parties named in new authorization applications against the accumulated record of recipients and intermediaries previously reported under Part 130;
- comparison of names reported under Part 130 against the parties named on the associated authorization, in order to identify unlicensed or undisclosed intermediaries;
- a flag where multiple brokers are used in connection with the same authorization;
- screening for politically exposed persons using the relationship information required by § 130.10(b)(2)(v);
- a consistency check across the recipient fields required by § 130.10(b)(2), flagging entries in which a recipient's address or principal place of business is inconsistent with the stated nationality, employer, or role — for example, an agent employed by an organ of the purchasing government but based in a third country;
- a ratio test comparing aggregate fees or commissions reported under § 130.10(a)(4)(v) to the total contract price required by § 130.10(a)(1); and
- flags derived from the purpose and contingency information recommended above, including payments for which no identifiable services were furnished, payments for which the recipient had no relevant experience in the services claimed, and compensation contingent upon award.

Several of these become possible only because of this rule. The recurrence of a single intermediary across transactions in different countries appeared in eight cases in our review, but we excluded it from

[15] DTAG, Annual Part 130 Reporting Forms, supra note 10, at 11.

our own risk assessment framework because establishing it required substantial manual research; a standing record of named recipients makes it a routine query. The ratio test likewise depends on two fields the rule collects.

Both depend on submissions remaining structured and complete. We would therefore urge the Department not to adopt suggestions that Part 130 reports be permitted in Excel or PDF format with supporting attachments, which would reinstate the manual review burden this rule is intended to eliminate and foreclose automated screening altogether. We support the reasonable objective behind that suggestion — an "Other" option and an attachment capability allowing registrants to explain arrangements that do not fit predefined fields — provided these supplement structured data fields rather than replace them. For the same reason we urge the Department to retain the requirement to report the total contract price of the sale to the foreign purchaser, which the proposed rule preserves in § 130.10(a)(1). We are aware that DTAG and industry commenters have proposed removing it because the Department receives purchase documentation or a Letter of Offer and Acceptance with the underlying transaction in any event. That is correct, but it does not meet the need: contract price held in a license file cannot be compared automatically against reported fees, and without it the ratio test described above cannot be performed.

We recognize that the specific parameters used in screening are sensitive. We recommend that the Department publish the categories of indicators it applies, as the Department of Commerce does for diversion risk in Supplement No. 3 to Part 732 of the Export Administration Regulations,[16] while keeping thresholds, weightings, and matching logic non-public. Publishing categories serves industry compliance as well as oversight.

We also note that a reporting relationship with Congress already exists already exists under § 130.17(a) and AECA Sections 36(a)(7) and 39(d), and would not need to be created. We recommend that the Department include in its existing reporting to the House Committee on Foreign Affairs and the Senate Committee on Foreign Relations a summary of the number of Part 130 submissions received, the number flagged under the procedure described above, the number escalated for compliance review, and the number referred to other agencies or to law enforcement. Reported alongside the payment information already provided, that summary would allow the committees to see not only what industry disclosed but whether the disclosure was used.

Conclusion

TI US supports the Department's move to periodic and electronic reporting under Part 130. It responds to real problems with the accuracy of the information the Department receives, and it reduces unnecessary burden on industry. Our four recommendations are intended to ensure that the reformed system retains the key information and produces the analysis that make Part 130 critical to helping prevent illicit and corrupt payments that could substantially harm U.S. foreign policy and national

[16]Supplement No. 3 to 15 C.F.R. part 732 ("BIS's 'Know Your Customer' Guidance and Red Flags").

security interests as outlined above. Each of the recommendations is consistent with AECA Section 39(a), and none would meaningfully increase the burden the Department has estimated.

Thank you for the opportunity to comment. If you have any questions, please contact Colby Goodman at cgoodman@us.transparency.org.

Sincerely,

Colby Goodman
Senior Researcher
Transparency International U.S.