Commodity Classification
Case Number: Z1843042
Date of Completion:
December 2, 2024

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

Wibu-Systems USA, Inc.
ATTN: John Poulson
120 West Dayton Street
Edmonds, WA 98020

G197593

THE FOLLOWING INFORMATION IS IN RESPONSE TO YOUR INQUIRY OF September 20, 2024 REQUESTING COMMODITY CLASSIFICATION(S) FOR:

COMMODITY	ECCN	SUBPARAGRAPH
Product = WibuKey A legacy A software licensing and anti-piracy protection system. Includes 64-bit FEAL encryption. Includes hardware dongle and O.S. runtime. Includes development tools to aid protection process 30xx-0x-xxx	EAR99	
Product = CodeMeter A software licensing and anti-piracy protection system. Includes 128-bit AES encryption. Future plans include 256-bit AES encryption. Includes hardware dongle and O.S. runtime. Includes development tools to aid protection process. 10xx-0x-xxx	EAR99	

COMMENTS FROM LICENSING OFFICER(S):

ITEM #1:
THIS MASS MARKET ENCRYPTION ITEM IS DESCRIBED IN SECTION 740.17(B)(1) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR).

AARON AMUNDSON
DIVISION DIRECTOR

FOR INFORMATION CONCERNING
THIS CLASSIFICATION CONTACT
SYLVIA JIMMISON
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BIS/EA/STC/IT