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INSIGHTS

U.S. Munitions List Revision Tracker

Last Updated: October 23, 2024

The U.S. Munitions List Revision Tracker catalogues all completed, proposed, and anticipated changes to the U.S. Munitions List (USML) under the International Traffic in Arms Regulations (ITAR). For each category, the tracker details the Export Control Reform (ECR) effective date, completed regulatory changes with Federal Register citations, proposed modifications, and anticipated future revisions.

Category I – Firearms and Related Articles

ECR Effective Date: March 2020

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in March 2020.

Category II – Guns and Armament

ECR Effective Date: March 2020

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in March 2020.

Category III – Ammunitions and Ordinance

ECR Effective Date: March 2020

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in March 2020.

Category IV – Launch Vehicles, Guided Missiles, Ballistic Missiles, Rockets, Torpedoes, Bombs, and Mines

ECR Effective Date: July 2014

Completed Changes: [83 Fed. Reg. 50003](#) (Oct. 4, 2018) (adding a second note to paragraph (d) to state that the control “does not control thrusters for spacecraft”); [79 Fed. Reg. 66608](#) (Nov. 10, 2014) (making editorial revisions to the technical data and defense services catch-all controls in paragraph (i)); [79 Fed. Reg. 36393](#) (June 27, 2014) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (proposing significant substantive and editorial revisions to the entire category).

Anticipated Changes: [RIN: 1400-AE52](#) (Spring 2024 Agenda) (seeking to issue final rule following publication of an interim final rule covering minor revisions to this category); See Proposed Changes involving latest proposed rule relating to [84 Fed. Reg. 8486](#) (March 8, 2019) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category V – Explosives and Energetic Materials, Propellants, Incendiary Agents, and Their Constituents

ECR Effective Date: July 2014

Completed Changes: [83 Fed. Reg. 50003](#) (Oct. 4, 2018) (adding a third note to this category to state that specified controlled items may be subject to Commerce Department licensing when incorporated into an item controlled as ECCN 1C608).

Proposed Changes: None

Anticipated Changes: [RIN: 1400-AE52](#) (Spring 2024 Agenda) (seeking to issue final rule following publication of an interim final rule covering minor revisions to this category); [83 Fed. Reg. 5970](#) (Feb. 12, 2018) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category VI – Surface Vessels of War and Special Naval Equipment

ECR Effective Date: January 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (revising paragraphs (a) and (b) to incorporate the related surface vessel interpretations within ITAR § 121.15; replacing “enumerated” with “described” in the paragraph (i) technical data and defense services control).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“The Department proposes to modify USML Category VI(f)(6) and (7) to avoid overlap in controls between those paragraphs and the proposed revision and intent of Category IV(b). As such, the Department proposes to clarify these paragraphs only describe certain integration equipment, aircraft launch and recovery equipment, and certain shipborne defensive systems, not articles described in Category IV(b). The Department further proposes to split paragraph (f)(6) into three subordinate paragraphs for ease of parsing and adjust the “MT” designations for consistency with the MTCR Annex.”).

Anticipated Changes: [80 Fed. Reg. 61138](#) (Oct. 9, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category VII – Ground Vehicles

ECR Effective Date: January 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (revising paragraphs (a), (b), (c), and (e), and adding the note to paragraph (c), and note 1, note 2, and note 3 to Category VII; incorporating the related ground vehicle interpretations within ITAR § 121.14).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“[T]he Department proposes to modify USML Category VII(g)(2) to avoid overlap in controls between that paragraph and the proposed revision and intent of Category IV(b), and therefore proposes to clarify paragraph (g)(2) only describes articles not already described in Category IV(b).”; proposing editorial revisions to paragraph (g)(13); proposing to remove the note in paragraph (g)(14)(iii); “The Department proposes to add USML Category VII(g)(15) . . . to ensure items designed for integrating certain defense articles are described in the same USML category as the platform they are being integrated into and to avoid ambiguity about whether they are controlled in USML Category IV(b).”).

Anticipated Changes: [80 Fed. Reg. 61138](#) (Oct. 9, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category VIII – Aircraft and Related Articles

ECR Effective Date: October 2013

Completed Changes: [88 Fed. Reg. 84072](#) (Dec. 4, 2023) (temporarily modifying the paragraph (h)(1) note to not release articles common to the KF-21 aircraft); [83 Fed. Reg. 50003](#) (Oct. 4, 2018) (revising paragraph (h)(2) for unmanned aerial vehicle “flight control systems and vehicle management systems with swarming capability”); [81 Fed. Reg. 83126](#) (Nov. 21, 2016) (making numerous revisions to the category, especially within paragraphs (a) and (h), including by adding items to paragraphs (h)(27) to (29) and removing items in paragraphs (h)(23) to (26)); [81 Fed. Reg. 70340](#) (Oct. 12, 2016) (removing and reserving paragraph (e)); [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (revising paragraph (a) and related notes to incorporate related aircraft interpretations within ITAR § 121.3; revising paragraphs (h)(3), (6), (13), (15) and (16); revising note to paragraph (h)(1) and paragraph (i) to change “enumerated to “described”); [79 Fed. Reg. 37536](#) (July 1, 2014) (revising paragraph (h)(4) “to ensure that wing folding systems for commercial aircraft are not controlled as defense articles”; removing paragraphs (h)(21) and (22) as such items are now covered by Category XI); [78 Fed. Reg. 61750](#) (Oct. 3, 2013) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“The Department proposes to . . . modify USML Category VIII(h)(6) to ensure items designed for integrating certain defense articles are described in the same USML category as the platform they are

being integrated into and to avoid ambiguity about whether they are controlled in USML Category IV(b).”); [81 Fed. Reg. 6797](#) (Feb. 9, 2016) (proposing revisions to this category, as later implemented in the final rule issued on Nov. 21, 2016, as noted above).

Anticipated Changes: [RIN: 1400-AE52](#) (Spring 2024 Agenda) (seeking to issue final rule following publication of an interim final rule covering minor revisions to this category); [80 Fed. Reg. 11313](#) (March 2, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category, as later addressed in the proposed rule issued on Feb. 9, 2016, as noted in the prior entry).

Category IX – Military Training Equipment and Training

ECR Effective Date: July 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (creating paragraph (e)(3) to provide a USML control to cover military training within ITAR § 120.32(a)(3) that is “not directly related to defense articles or technical data”; replacing “enumerated” with “described” in the paragraph (e) technical data and defense services control).

Proposed Changes: [89 Fed. Reg. 60980](#) (July 29, 2024) (proposing to move the controls in paragraph (i)(3) to new paragraph (s) to control certain forms of military assistance and intelligence activities that do not relate to defense articles).

Anticipated Changes: None

Category X – Personal Protective Equipment

ECR Effective Date: July 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (replacing “enumerated” with “described” in the paragraph (e) technical data and defense services control).

Proposed Changes: None

Anticipated Changes: [83 Fed. Reg. 5970](#) (Feb. 12, 2018) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category XI – Military Electronics

ECR Effective Date: December 2014

Completed Changes: [89 Fed. Reg. 20546](#) (March 25, 2024) (revising paragraph (c)(5) regarding certain high-energy storage capacitors and increasing threshold to greater than 500 volts); [88 Fed. Reg. 25488](#) (April 27, 2023) (revising paragraph (c)(5) regarding certain high-energy capacitors); [87 Fed. Reg. 74967](#) (Dec. 7, 2022) (temporarily revising paragraph (c)(5) regarding certain high-energy capacitors,

related interim final rule published on April 27, 2023, as noted in the prior entry); [86 Fed. Reg. 48021](#) (August 27, 2021) (extending to August 26, 2026, the temporary modification to paragraph (b) that inserts “analyze and produce information from” into the context text and adds “software to the description of items controlled”); [83 Fed. Reg. 50003](#) (Oct. 4, 2018) (revising paragraphs (a)(3)(i) and (a)(3)(xii) in response to commercial drone applications, and revising paragraph (c)(4) “to implement power thresholds that will exclude those components necessary for 5G wireless technology”); [84 Fed. Reg. 45652](#) (August 30, 2019) (removing and reserving paragraph (a)(3)(ix) and adding a note to Category XI removing certain “transmit/receive modules and transmit/receive monolithic microwave integrated circuits” as they have “current and imminent commercial uses for certain lower performing radars”; extending temporary modification of paragraph (b) to August 30, 2021); [83 Fed. Reg. 44228](#) (August 30, 2018) (extending temporary modification of paragraph (b) to August 30, 2019); [82 Fed. Reg. 41172](#) (August 30, 2017) (extending temporary modification of paragraph (b) to August 30, 2018); [80 Fed. Reg. 78130](#) (Dec. 16, 2015) (extending temporary modification of paragraph (b) to August 30, 2017); [80 Fed. Reg. 37974](#) (July 2, 2015) (temporarily modifying paragraph (b) until December 29, 2015, to control certain “intelligence analytics software”).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“The Department proposes to modify USML Category XI(c)(4) to control the MMICs removed from Category XV.”; “The Department proposes to expand the scope of items described in paragraph (c)(15) of USML Category XI by adding electronic parts and components capable of operation at temperatures in excess of 125 °C and specially designed for spacecraft described in USML Category XV.”).

Anticipated Changes: [RIN: 1400-AE52](#) (Spring 2024 Agenda) (seeking to issue final rule following publication of an interim final rule covering minor revisions to this category); [RIN: 1400-AF40](#) (Spring 2024 Agenda) (seeking to issue a proposed rule “to revise paragraphs (c)(1) through (4)”); [83 Fed. Reg. 5970](#) (Feb. 12, 2018) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category XII – Fire Control, Laser, Imaging, and Guidance Equipment

ECR Effective Date: December 2016

Completed Changes: None

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“The Department requests comment on the potential merits of removing of USML Category XII(e)(14), with no change in the scope of control. Integrated circuits described therein are already described in USML Category XI(c)(1) and the Department asks whether the regulated community sees a benefit to retaining USML Category XII(e)(14) as a separate entry.”).

Anticipated Changes: [82 Fed. Reg. 4226](#) (Jan. 13, 2017) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category XIII – Materials and Miscellaneous Articles

ECR Effective Date: January 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (replacing “enumerated” with “described” in the paragraph (l) technical data and defense services control); [79 Fed. Reg. 26](#) (Jan. 6, 2014) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (“The Department proposes to revise paragraph (j) for consistency in the regulatory text, with no change in scope, and to add two subordinate paragraphs to paragraph (j) to describe materials specially designed for underwater launch of missiles or hostile nuclear radiation environments.”).

Anticipated Rulemaking: [80 Fed. Reg. 61138](#) (Oct. 9, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category XIV – Toxicological Agents, Including Chemical Agents, Biological Agents, and Associated Equipment

ECR Effective Date: December 2016

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in December 2016.

Category XV – Spacecraft and Related Articles

ECR Effective Date: November 2014

Completed Changes: [83 Fed. Reg. 50003](#) (Oct. 4, 2018) (revising paragraph (f) concerning defense service to include certain integration services); [82 Fed. Reg. 2889](#) (Jan. 10, 2017) (making revisions in response to public comments from 2014 interim final rule); [79 Fed. Reg. 66608](#) (Nov. 10, 2014) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (proposing significant substantive and editorial revisions to the entire category).

Anticipated Changes: See Proposed Changes involving latest proposed rule relating to [84 Fed. Reg. 8486](#) (March 8, 2019) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category); [RIN: 1400-AE52](#)

(Spring 2024 Agenda) (seeking to issue final rule following publication of an interim final rule covering minor revisions to this category).

Category XVI – Nuclear Weapons Related Articles

ECR Effective Date: July 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (replacing “enumerated” with “described” in the paragraph (e) technical data and defense services control).

Proposed Changes: None

Anticipated Rulemaking: [RIN: 1400-AE94](#) (Spring 2024 Agenda) (seeking to issue an interim final rule “to better harmonize [Category XVI] with the Department of Energy part 810 regulations”).

Category XVII – Classified Articles, Technical Data, and Defense Services Not Otherwise Enumerated

ECR Effective Date: October 2013

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in October 2013.

Category XVIII – Directed Energy Weapons

ECR Effective Date: December 2016

No revisions, including anticipated or proposed revisions, since this category was revised under Export Control Reform in December 2016.

Category XIX – Gas Turbine Engines and Associated Equipment

ECR Effective Date: October 2013

Completed Changes: [81 Fed. Reg. 83126](#) (Nov. 21, 2016) (making numerous revisions to the category, including by adding items to paragraphs (f)(7) through (12); [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (adding note to paragraph (f)(1) and revising paragraph (g) to change “enumerated to “described”); [79 Fed. Reg. 37536](#) (July 1, 2014) (removing paragraph (f)(7) as such items are now covered by Category XI); [78 Fed. Reg. 61750](#) (Oct. 3, 2013) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [81 Fed. Reg. 6797](#) (Feb. 9, 2016) (proposing revisions to this category, related final rule issued on Nov. 21, 2016, as noted above);

Anticipated Changes: [80 Fed. Reg. 11313](#) (March 2, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category, related proposed rule issued on Feb. 9, 2016, as noted in the prior entry).

Category XX – Submersible Vessels and Related Articles

ECR Effective Date: January 2014

Completed Changes: [79 Fed. Reg. 61226](#) (Oct. 10, 2014) (revising paragraph (a) to incorporate the related surface submarine interpretations within ITAR § 121.14; replacing “enumerated” with “described” in the paragraph (d) technical data and defense services control); [79 Fed. Reg. 26](#) (Jan. 6, 2014) (making minor corrections prior to implementation of the revised category).

Proposed Changes: [89 Fed. Reg. 84482](#) (Oct. 23, 2024) (proposing revisions to paragraph (c) by removing the note defining “range”).

Anticipated Rulemaking: [80 Fed. Reg. 61138](#) (Oct. 9, 2015) (issuing notice of inquiry seeking public comments on whether to add or remove items from this category).

Category XXI – Articles, Technical Data, and Defense Services Not Otherwise Enumerated

ECR Effective Date: October 2013

Completed Changes: None.

Proposed Changes: None.

Anticipated Rulemaking: [RIN: 1400-AF42](#) (Spring 2024 Agenda) (seeking to issue interim final rule “to limit the items categorized in USML Category XXI by updating the appropriate USML paragraph”).

Contact Information



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With the unique experience of writing and heavily influencing U.S. export control laws, companies turn to Christopher as their go-to counsel for high-stakes situations and cutting-edge legal strategies. Christopher also notably has the rare distinction of successfully litigating export control issues in federal court, leading to the only appellate decision to reject agency interpretations of the ITAR. Beyond his client work, he serves as co-chair of the American Bar Association’s Export Controls and Economic Sanctions Committee.

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