



Export Compliance and Travel with Portable Electronic Devices¹

U.S. export control regulations do apply to the hand-carrying of Portable Electronic Devices (defined in footnote below) on international travel. However in the vast majority of these cases, one or both of two broad exemptions to U.S. export licensing requirements will apply to the hand-carrying of such devices internationally: 1) License Exception TMP for temporary exports; and 2) License Exception BAG for personal baggage, including “tools of the trade.” For this reason, instances where a U.S. export license would actually be required before one could hand-carry a Portable Electronic Device on an international trip are quite limited. The question set below is designed to help Middlebury staff and faculty who plan to hand-carry - or arrange the hand-carry of - Middlebury-issued Portable Electronic Devices on international travel, identify such instances. If answers to one or more of the questions is “YES” this does not automatically mean that a U.S. export license is required, but the Middlebury Export Controls Advisory Group should be contacted for further guidance.

- a. Will the Portable Electronic Device be hand-carried to Iran, North Korea, Sudan, Syria, or Cuba?
No Yes
- b. Does the Portable Electronic Device include any software that is not part of the standard set of software pre-installed on the device or commonly available for download without restriction?
No Yes
- c. Does the Portable Electronic Device contain any technical data, research data/results, or accessible source code that is considered proprietary or otherwise not intended for publication?
No Yes
- d. Is the Portable Electronic Device a prototype?
No Yes
- e. Will the Portable Electronic Device be away from U.S. territory for over 1 continuous year?
No Yes
- f. Will the Portable Electronic Device be left in the destination or any transit countries visited on your trip (i.e. – a permanent export)? [This does not include accidental loss, but see Note below on maintaining control over your Portable Electronic Device]
No Yes

If the answer is “Yes” to any of the parts of the previous question, then you need to investigate further the details of the activities to confirm any licensing requirements by contacting a member of the Middlebury Export Controls Advisory Group (see: http://www.middlebury.edu/international/global_operations/export)

***** Note:** When carrying a Middlebury-issued Portable Electronic Device on international travel, it is important to maintain adequate control over the device at all times, to prevent unauthorized access to the device. Additionally, access to the device’s operating system should be password-protected.

¹ “Portable Electronic Devices” include laptop PCs, tablets, smartphones, and cell phones – basically any mobile electronic device for individual use that supports data processing, data transmission and receipt, and/or mobile telephony.