

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

In the Matter of:)
)
ArvinMeritor, Inc.)
2135 West Maple Road)
Troy, MI 48084)
)
Respondent)

ORDER RELATING TO ARVINMERITOR, INC.

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has notified ArvinMeritor, Inc. (“ArvinMeritor”) of its intention to initiate an administrative proceeding against ArvinMeritor pursuant to Section 766.3 of the Export Administration Regulations (the “Regulations”),¹ and Section 13(c) of the Export Administration Act of 1979, as amended (the “Act”),² through the issuance of a Proposed Charging Letter to ArvinMeritor that alleged that it committed fourteen violations of the Regulations. Specifically, the charges are:

Charge 1 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Various Axles to China

On one occasion on or about August 31, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China various axles, items classified under Export Control Classification Number (“ECCN”) 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$45,150, without the

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The violations alleged occurred in 2005, 2006 and 2007. The Regulations governing the violations at issue are found in the 2005, 2006, and 2007 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774. The 2010 Regulations govern the procedural aspects of this case.

² 50 U.S.C. app. §§ 2401-2420 (2000). Since August 21, 2001, the Act has been in lapse and the President, through Executive Order 13222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, the most recent being that of August 12, 2010 (75 Fed. Reg. 50,681 (Aug. 16, 2010)), has continued the Regulations in effect under the International Emergency Economic Powers Act (50 U.S.C. §§ 1701 *et seq.*).

Department of Commerce license required by Section 742.4 of the Regulations. ArvinMeritor believed the axles were shipped to a Chinese auto manufacturer to be incorporated into a prototype of a commercial diesel vehicle. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 2 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to Brazil

On or about December 1, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to Brazil technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of carrier castings to fit the axle of the Family of Medium Tactical Vehicles (“FMTV-A1”), and was transferred to a Brazilian company that was assisting in the manufacture of this component part. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 3 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to an Indian National

On one occasion on or about March 1, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, to an employee who was at the time a national of India, without the Department of Commerce license required by Section 742.4 of the Regulations. The technology was in the form of technical drawings that depicted axle assemblies for two vehicle platforms, one for a tractor-trailer and another for a heavy-duty truck. Pursuant to Section 734.2(b)(2)(ii) of the Regulations, the release of technology to a foreign national is deemed to be the export of the technology to the home country of the foreign national. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charges 4-12 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to India, China, Mexico and South Korea

On nine occasions on or about May 30, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China, India, Mexico and South Korea technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of FMTV-A1 rear housing casts. In doing so, ArvinMeritor committed nine violations of Section 764.2(a) of the Regulations.

Charge 13 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Seal Assemblies to France

On one occasion on or about November 29, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to France seal assemblies for the FMTV-A1, items classified under ECCN 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$2,058, without the Department of Commerce license required by Section 742.4 of the Regulations. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 14 15 C.F.R. § 764.2(b) – Causing, Aiding and Abetting an Export to Italy

On one occasion on or about August 15, 2005, ArvinMeritor caused, aided and abetted the unlicensed export from the United States to Italy of technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce license required by Section 742.4 of the Regulations. Specifically, ArvinMeritor, which had engaged with an Italian company for the FMTV-A1 gear drive to be manufactured in Italy, transferred technical drawings for the FMTV-A1 gear drive to the U.S. sales offices of the Italian company. The U.S. sales office then forwarded the technical drawings to its offices in Italy. In doing so, ArvinMeritor committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, BIS and ArvinMeritor have entered into a Settlement Agreement pursuant to Section 766.18(a) of the Regulations, whereby they agreed to settle this matter in accordance with the terms and conditions set forth therein; and

WHEREAS, I have approved of the terms of such Settlement Agreement;

IT IS THEREFORE ORDERED:

FIRST, ArvinMeritor shall be assessed a civil penalty in the amount of \$100,000.

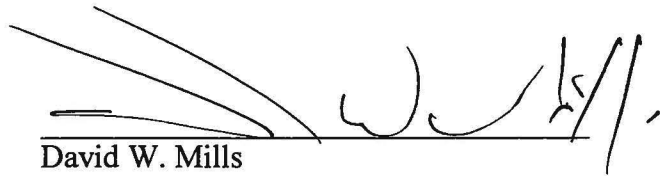
ArvinMeritor shall pay the amount in full to the U.S. Department of Commerce within 30 days of the date of the Order.

SECOND, that, pursuant to the Debt Collection Act of 1982, as amended (31 U.S.C. §§ 3701-3720E (2000)), the civil penalty owed under this Order accrues interest as more fully described in the attached Notice, and if payment is not made by the due date specified herein, ArvinMeritor will be assessed, in addition to the full amount of the civil penalty and interest, a penalty charge and an administrative charge, as more fully described in the attached Notice.

THIRD, that the timely payment of the civil penalty set forth above is hereby made a condition to the granting, restoration, or continuing validity of any export license, license exception, permission, or privilege granted, or to be granted, to ArvinMeritor. Accordingly, if ArvinMeritor should fail to pay the civil penalty in a timely manner, the undersigned may issue an Order denying all of ArvinMeritor's export privileges under the Regulations for a period of one year from the date of this Order.

FOURTH, that the Proposed Charging Letter, the Settlement Agreement, and this Order shall be made available to the public.

This Order, which constitutes the final agency action in this matter, is effective immediately.



David W. Mills
Assistant Secretary of Commerce
for Export Enforcement

Issued this 22 day of March, 2011.

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

In the Matter of:)
)
ArvinMeritor, Inc.)
2135 West Maple Road)
Troy, MI 48084)
)
Respondent)

SETTLEMENT AGREEMENT

This Settlement Agreement (“Agreement”) is made by and between ArvinMeritor, Inc. (“ArvinMeritor”) and the Bureau of Industry and Security, U.S. Department of Commerce (“BIS”) (collectively, the “Parties”), pursuant to Section 766.18(a) of the Export Administration Regulations (the “Regulations”),¹ issued pursuant to the Export Administration Act of 1979, as amended (the “Act”).²

WHEREAS, ArvinMeritor filed a voluntary self-disclosure with BIS’s Office of Export Enforcement in accordance with Section 764.5 of the Regulations concerning the transactions at issue herein;

WHEREAS, BIS has notified ArvinMeritor of its intention to initiate an administrative proceeding against it, pursuant to the Act and the Regulations;

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2010). The violations alleged occurred in 2005, 2006 and 2007. The Regulations governing the violations at issue are found in the 2005, 2006, and 2007 versions of the Code of Federal Regulations, 15 C.F.R. Parts 730-774. The 2010 Regulations govern the procedural aspects of this case.

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WHEREAS, BIS has issued a Proposed Charging Letter to ArvinMeritor that alleged that ArvinMeritor committed fourteen violations of the Regulations, specifically:

Charge 1 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Various Axles to China

On one occasion on or about August 31, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China various axles, items classified under Export Control Classification Number (“ECCN”) 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$45,150, without the Department of Commerce license required by Section 742.4 of the Regulations. ArvinMeritor believed the axles were shipped to a Chinese auto manufacturer to be incorporated into a prototype of a commercial diesel vehicle. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 2 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to Brazil

On or about December 1, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to Brazil technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of carrier castings to fit the axle of the Family of Medium Tactical Vehicles (“FMTV-A1”), and was transferred to a Brazilian company that was assisting in the manufacture of this component part. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 3 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to an Indian National

On one occasion on or about March 1, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, to an employee who was at the time a national of India, without the Department of Commerce license required by Section 742.4 of the Regulations. The technology was in the form of technical drawings that depicted axle assemblies for two vehicle platforms, one for a tractor-trailer and another for a heavy-duty truck. Pursuant to Section 734.2(b)(2)(ii) of the Regulations, the release of technology to a foreign national is deemed to be the export of the technology to the home country of the foreign national. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charges 4-12 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Technical Data to India, China, Mexico and South Korea

On nine occasions on or about May 30, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China, India, Mexico and South Korea technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of FMTV-A1 rear housing casts. In doing so, ArvinMeritor committed nine violations of Section 764.2(a) of the Regulations.

Charge 13 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Seal Assemblies to France

On one occasion on or about November 29, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to France seal assemblies for the FMTV-A1, items classified under ECCN 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$2,058, without the Department of Commerce license required by Section 742.4 of the Regulations. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 14 15 C.F.R. § 764.2(b) – Causing, Aiding and Abetting an Export to Italy

On one occasion on or about August 15, 2005, ArvinMeritor caused, aided and abetted the unlicensed export from the United States to Italy of technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce license required by Section 742.4 of the Regulations. Specifically, ArvinMeritor, which had engaged with an Italian company for the FMTV-A1 gear drive to be manufactured in Italy, transferred technical drawings for the FMTV-A1 gear drive to the U.S. sales offices of the Italian company. The U.S. sales office then forwarded the technical drawings to its offices in Italy. In doing so, ArvinMeritor committed one violation of Section 764.2(b) of the Regulations.

WHEREAS, ArvinMeritor has reviewed the Proposed Charging Letter and is aware of the allegations made against it and the administrative sanctions which could be imposed against it if the allegations are found to be true;

WHEREAS, ArvinMeritor fully understands the terms of this Agreement and the Order (“Order”) that the Assistant Secretary of Commerce for Export Enforcement will issue if he approves this Agreement as the final resolution of this matter;

WHEREAS, ArvinMeritor enters into this Agreement voluntarily and with full knowledge of its rights;

WHEREAS, ArvinMeritor states that no promises or representations have been made to it other than the agreements and considerations herein expressed;

WHEREAS, ArvinMeritor neither admits nor denies the allegations contained in the Proposed Charging Letter;

WHEREAS, ArvinMeritor wishes to settle and dispose of all matters alleged in the Proposed Charging Letter by entering into this Agreement; and

WHEREAS, ArvinMeritor agrees to be bound by the Order, if issued;

NOW THEREFORE, the Parties hereby agree, for purposes of this Settlement Agreement, as follows:

1. BIS has jurisdiction over ArvinMeritor, under the Regulations, in connection with the matters alleged in the Proposed Charging Letter.
2. The following sanction shall be imposed against ArvinMeritor in complete settlement of the alleged violations of the Regulations relating to the transactions specifically detailed in the Proposed Charging Letter:
 - a. ArvinMeritor shall be assessed a civil penalty in the amount of \$100,000. ArvinMeritor shall pay the amount in full to the U.S. Department of Commerce within 30 days of the date of the Order. Payment shall be made in the manner specified in the attached instructions.

b. The timely payment of the civil penalty agreed to in paragraph 2.a is hereby made a condition to the granting, restoration, or continuing validity of any export license, permission, or privilege granted, or to be granted, to ArvinMeritor. Failure to make timely payment of the civil penalty set forth above may result in the denial of all of ArvinMeritor's export privileges for a period of one year from the date of imposition of the penalty.

3. Subject to the approval of this Agreement pursuant to paragraph 8 hereof, ArvinMeritor hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violations of this Agreement or the Order, if issued), including, without limitation, any right to: (a) an administrative hearing regarding the allegations in any charging letter; (b) request a refund of any civil penalty paid pursuant to this Agreement and the Order, if issued; and (c) seek judicial review or otherwise contest the validity of this Agreement or the Order, if issued.

4. BIS agrees that, upon issuance of the Order, it will not initiate any further administrative proceeding against ArvinMeritor in connection with any violation of the Act or the Regulations arising out of the transactions specifically detailed in the Proposed Charging Letter.

5. BIS will make the Proposed Charging Letter, this Agreement, and the Order, if issued, available to the public.

6. This Agreement is for settlement purposes only. Therefore, if this Agreement is not accepted and the Order is not issued by the Assistant Secretary of Commerce for Export Enforcement pursuant to Section 766.18(a) of the Regulations, no Party may use this Agreement in any administrative or judicial proceeding and the Parties

shall not be bound by the terms contained in this Agreement in any subsequent administrative or judicial proceeding.

7. No agreement, understanding, representation or interpretation not contained in this Agreement may be used to vary or otherwise affect the terms of this Agreement or the Order, if issued; nor shall this Agreement serve to bind, constrain, or otherwise limit any action by any other agency or department of the U.S. Government with respect to the facts and circumstances addressed herein.

8. This Agreement shall become binding on the Parties only if the Assistant Secretary of Commerce for Export Enforcement approves it by issuing the Order, which will have the same force and effect as a decision and order issued after a full administrative hearing on the record.

9. Each signatory affirms that he has authority to enter into this Settlement Agreement and to bind its respective party to the terms and conditions set forth herein.

BUREAU OF INDUSTRY AND SECURITY
U.S. DEPARTMENT OF COMMERCE



Douglas R. Hassebrock
Director
Office of Export Enforcement

Date: 15 MAR, 2011



David Bowman
Vice President, Global Trade Compliance
ArvinMeritor, Inc.

Date: March 11, 2011

PROPOSED CHARGING LETTER

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

ArvinMeritor, Inc.
2135 West Maple Road
Troy, MI 48084

Attention: Vernon G. Baker, II
Senior Vice President and General Counsel

Dear Mr. Baker:

The Bureau of Industry and Security, U.S. Department of Commerce (“BIS”), has reason to believe that ArvinMeritor, Inc. (“ArvinMeritor”) of Troy, Michigan, has committed fourteen violations of the Export Administration Regulations (the “Regulations”),¹ which are issued under the authority of the Export Administration Act of 1979, as amended (the “Act”).² Specifically, BIS alleges that ArvinMeritor committed the following violations:

Charge 1 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Various Axles to China

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on one occasion on or about August 31, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China various axles, items classified under Export Control Classification Number (“ECCN”) 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$45,150, without the Department of Commerce license required by Section 742.4 of the Regulations. ArvinMeritor believed the axles were shipped to a Chinese auto manufacturer to be incorporated into a prototype of a commercial diesel vehicle. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

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**Charge 2 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting
Technical Data to Brazil**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on or about December 1, 2005, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to Brazil technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of carrier castings to fit the axle of the Family of Medium Tactical Vehicles (“FMTV-A1”), and was transferred to a Brazilian company that was assisting in the manufacture of this component part. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

**Charge 3 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting
Technical Data to an Indian National**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on one occasion on or about March 1, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, to an employee who was at the time a national of India, without the Department of Commerce license required by Section 742.4 of the Regulations. The technology was in the form of technical drawings that depicted axle assemblies for two vehicle platforms, one for a tractor-trailer and another for a heavy-duty truck. Pursuant to Section 734.2(b)(2)(ii) of the Regulations, the release of technology to a foreign national is deemed to be the export of the technology to the home country of the foreign national. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

**Charges 4-12 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting
Technical Data to India, China, Mexico and South Korea**

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on nine occasions on or about May 30, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to China, India, Mexico and South Korea technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce licenses required by Section 742.4 of the Regulations. The technology was in the form of technical drawings of FMTV-A1 rear housing casts. In doing so, ArvinMeritor committed nine violations of Section 764.2(a) of the Regulations.

Charge 13 15 C.F.R. § 764.2(a) – Engaging in Prohibited Conduct by Exporting Seal Assemblies to France

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on one occasion on or about November 29, 2006, ArvinMeritor engaged in conduct prohibited by the Regulations by exporting from the United States to France seal assemblies for the FMTV-A1, items classified under ECCN 9A018, subject to the Regulations, controlled for national security reasons, and valued at approximately \$2,058, without the Department of Commerce license required by Section 742.4 of the Regulations. In doing so, ArvinMeritor committed one violation of Section 764.2(a) of the Regulations.

Charge 14 15 C.F.R. § 764.2(b) – Causing, Aiding and Abetting an Export to Italy

As described in greater detail in the Schedule of Violations, which is enclosed herewith and incorporated herein by reference, on one occasion on or about August 15, 2005, ArvinMeritor caused, aided and abetted the unlicensed export from the United States to Italy of technology classified under ECCN 9E018, subject to the Regulations and controlled for national security reasons, without the Department of Commerce license required by Section 742.4 of the Regulations. Specifically, ArvinMeritor, which had engaged with an Italian company for the FMTV-A1 gear drive to be manufactured in Italy, transferred technical drawings for the FMTV-A1 gear drive to the U.S. sales offices of the Italian company. The U.S. sales office then forwarded the technical drawings to its offices in Italy. In doing so, ArvinMeritor committed one violation of Section 764.2(b) of the Regulations.

* * * * *

Accordingly, ArvinMeritor is hereby notified that an administrative proceeding is instituted against it pursuant to Section 13(c) of the Act and Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions and any other liability sanction or penalty available under law, including, but not limited to any or all of the following:

- The maximum civil penalty allowed by law of up to the greater of \$250,000 per violation, or twice the value of the transaction that is the basis of the violation;³
- Denial of export privileges; and/or
- Exclusion from practice before BIS.

³ See International Emergency Economic Powers Enhancement Act of 2007, Pub. L. No. 110-96, 121 Stat. 1011 (2007).

If ArvinMeritor fails to answer the charges contained in this letter within 30 days after being served with notice of issuance of this letter, that failure will be treated as a default. *See* 15 C.F.R. §§ 766.6 and 766.7 (2010). If ArvinMeritor defaults, the Administrative Law Judge may find the charges alleged in this letter are true without a hearing or further notice to ArvinMeritor. The Under Secretary of Commerce for Industry and Security may then impose up to the maximum penalty for the charges in this letter.

ArvinMeritor is further notified that it is entitled to an agency hearing on the record if it files a written demand for one with its answer. *See* 15 C.F.R. § 766.6. ArvinMeritor is also entitled to be represented by counsel or other authorized representative who has power of attorney to represent it. *See* 15 C.F.R. §§ 766.3(a) and 766.4.

The Regulations provide for settlement without a hearing. *See* 15 C.F.R. § 766.18. Should ArvinMeritor have a proposal to settle this case, ArvinMeritor should transmit it to the attorney representing BIS named below.

ArvinMeritor is further notified that under the Small Business Regulatory Enforcement Flexibility ACT, ArvinMeritor may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter. To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

The U.S. Coast Guard is providing administrative law judge services in connection with the matters set forth in this letter. Accordingly, ArvinMeritor's answer must be filed in accordance with the instructions in Section 766.5(a) of the Regulations with:

U.S. Coast Guard ALJ Docketing Center
40 S. Gay Street
Baltimore, Maryland 21202-4022

In addition, a copy of ArvinMeritor's answer must be served on BIS at the following address:

Chief Counsel for Industry and Security
Attention: R. Elizabeth Abraham
Room H-3839
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

ArvinMeritor, Inc.
Proposed Charging Letter
Page 5 of 6

R. Elizabeth Abraham is the attorney representing BIS in this case. Any communications that ArvinMeritor may wish to have concerning this matter should occur through her. Ms. Abraham may be contacted by telephone at (202) 482-5301.

Sincerely,

Douglas R. Hassebrock
Director
Office of Export Enforcement

Schedule of Violations

Charge No.	Export Date	Destination	Commodity Description	ECCN	Total Value	Violation
1	8/31/2005	China	Axles, various	9A018	\$45,150	15 C.F.R. § 764.2(a)
2	12/1/2005	Brazil	Drawings of Carrier Casting Axle for Family of Medium Tactical Vehicles (FMTV-A1)	9E018	n/a	15 C.F.R. § 764.2(a)
3	3/1/2006	India	Drawing of Parts for Tractor Trailer and Heavy-Duty Truck Vehicle Platforms	9E018	n/a	15 C.F.R. § 764.2(a)
4	5/30/2006	India	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
5	5/30/2006	India	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
6	5/30/2006	China	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
7	5/30/2006	China	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
8	5/30/2006	China	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
9	5/30/2006	China	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
10	5/30/2006	China	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
11	5/30/2006	Mexico	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
12	5/30/2006	South Korea	Drawings of Rear Housing Cast for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(a)
13	11/29/2006	France	Seal Assemblies	9A018	\$2,058	15 C.F.R. § 764.2(a)
14	08/15/2005	Italy	Drawings of Gear Drive for FMTV-A1	9E018	n/a	15 C.F.R. § 764.2(b)