

**Commodity Classification**  
**Case Number: Z1824723**  
**Date of Completion:**  
**March 25, 2025**



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

Anetac, Inc.  
 C/O COOLEY LLP  
 ATTN: Rebecca Ross  
 1299 PENNSYLVANIA AVE, NW  
 SUITE 700  
 WASHINGTON, DC 20004

G196281

THE FOLLOWING INFORMATION IS IN RESPONSE TO YOUR INQUIRY OF April 10, 2024 REQUESTING COMMODITY CLASSIFICATION(S) FOR:

COMMODITY	ECCN	SUBPARAGRAPH
The Anetac Dynamic Identity Platform is a software-as-a-service cybersecurity solution for discovering, monitoring, and controlling privileges for service accounts. Anetac Platform	5D002	C1
Source code for the Anetac Platform (Export Item #1 above). Anetac Platform Source Code	5D002	C1
Encryption-related technology for the development, production, or use of the Anetac Platform and related source code (Export Items #1 and #2 above). Anetac Platform Technology	5E002	A
The Anetac Data Collector is an on-premises client-side agent that is used in conjunction with the Anetac Platform (Export Item #1 above). Anetac Data Collector	5D002	C1
Source code for the Anetac Data Collector (Export Item #4 above). Anetac Data Coll. Source Code	5D002	C1
Encryption-related technology for the development, production, or use of the Anetac Data Collector and related source code (Export Items #5 and #6 above). Anetac Data Coll. Technology	5E002	A

**COMMENTS FROM LICENSING OFFICER(S):**

**ITEM #1:**

THIS ENCRYPTION ITEM IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTION 740.17(A) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR) AND IS DESCRIBED IN SECTION 740.17(B)(1).

**ITEM #2:**

THIS ENCRYPTION SOURCE CODE IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTIONS 740.17 (A) AND (B)(2) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR). FOR ITEMS AUTHORIZED UNDER 740.17(B)(2), THE EAR MAY REQUIRE SUBMISSION OF A SEMI-ANNUAL REPORT IN ACCORDANCE WITH 740.17(E).

**ITEM #3:**

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THIS ENCRYPTION TECHNOLOGY IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTIONS 740.17 (A) AND (B)(2)(IV)(B) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR). FOR ITEMS AUTHORIZED UNDER 740.17(B)(2), THE EAR MAY REQUIRE SUBMISSION OF A SEMI-ANNUAL REPORT IN ACCORDANCE TO 740.17(E).

ITEM #4:

THIS ENCRYPTION ITEM IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTION 740.17(A) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR) AND IS DESCRIBED IN SECTION 740.17(B)(1).

ITEM #5:

THIS ENCRYPTION SOURCE CODE IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTIONS 740.17 (A) AND (B)(2) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR). FOR ITEMS AUTHORIZED UNDER 740.17(B)(2), THE EAR MAY REQUIRE SUBMISSION OF A SEMI-ANNUAL REPORT IN ACCORDANCE WITH 740.17(E).

ITEM #6:

THIS ENCRYPTION TECHNOLOGY IS AUTHORIZED FOR LICENSE EXCEPTION ENC UNDER SECTIONS 740.17 (A) AND (B)(2)(IV)(B) OF THE EXPORT ADMINISTRATION REGULATIONS (EAR). FOR ITEMS AUTHORIZED UNDER 740.17(B)(2), THE EAR MAY REQUIRE SUBMISSION OF A SEMI-ANNUAL REPORT IN ACCORDANCE TO 740.17(E).

AARON AMUNDSON  
DIVISION DIRECTOR

FOR INFORMATION CONCERNING  
THIS CLASSIFICATION CONTACT  
MICHAEL PENDER  
PHONE #: 202-482-2458  
BIS/EA/STC/IT