

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

In the Matter of
Wabtec Corporation

Case No. 22-02

ORDER

The Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce (“BIS”) has notified Wabtec Corporation (“Wabtec”) of its intention to initiate an administrative proceeding pursuant to the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2023)) (the “Regulations”)¹, against Wabtec, a domestic concern, based on allegations set forth in the Proposed Charging Letter, dated October 26, 2023 that Wabtec committed forty-three violations of the Regulations.

¹ The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, continued the Regulations in full force and effect under the International Emergency Economic Powers Act, (50 U.S.C. § 1701, *et seq.* (2012)) (“IEEPA”).

On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). The Anti-Boycott Act of 2018 is a subpart of ECRA. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

Specifically, the Proposed Charging Letter alleged:

Charges 1 – 43 (15 C.F.R. § 760.5) – Failing to Report the Receipt of a Request to Engage in a Restrictive Trade Practice or Foreign Boycott Against a Country Friendly to the United States

In connection with activities involving the sale and/or transfer of goods or services (including information) from the United States to Pakistan during the period February 2018 through July 2022, on forty-three occasions, Wabtec received a request as described in Table A, which is attached and incorporated herein by this reference, to take an action which would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott.

Section 760.5 of the Regulations requires United States persons to report to the Department of Commerce their receipt of such requests. Wabtec failed to report to the Department of Commerce the receipt of these requests.

By failing to report receipt of these requests, as directed by Section 760.5 of the Regulations, Wabtec committed forty-three violations of Section 760.5 of the Regulations.

WHEREAS, Wabtec admits that it committed the alleged conduct described in the Proposed Charging Letter and Table A;

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

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

IT IS THEREFORE ORDERED THAT:

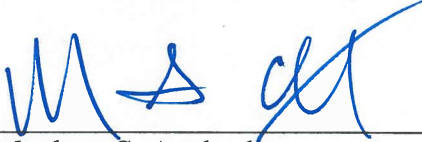
FIRST, a civil penalty of \$ 153,175 shall be assessed against Wabtec and shall be paid to the U.S. Department of Commerce within 30 days from the date of entry of this Order. Payment of this sum shall be made in the manner specified in the attached instructions.

SECOND, pursuant to the Debt Collections Act of 1982, as amended (31 U.S.C. §§3701 – 3720E (2012)), 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, Wabtec shall 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, Wabtec's compliance with the terms of the Settlement Agreement and this Order, as set forth above, including the full and timely payment of the civil penalty of \$ 153,175, 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 Wabtec. Accordingly, if Wabtec should fail to comply in full with the terms of the Settlement Agreement and this Order, the undersigned may issue an Order denying all of Wabtec's export privileges for a period of one year from the date of issuance of any such denial order.

FOURTH, 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.



Matthew S. Axelrod
Assistant Secretary of Commerce for Export
Enforcement

Entered this 20th day of January, 2024

Attachments

INSTRUCTIONS FOR PAYMENT OF SETTLEMENT AMOUNT

1. The check should be made payable to:

Bureau of Industry & Security (BIS)
(Please note on the check: **BIS-Case No. 22-02**)

2. The check can be sent to the following Treasury address for processing:

Via United States Postal Service (USPS), FedEx or UPS

NOAA/OCFO
Attn : Finance Office - Travel Dept
1315 East-West Highway, Bldg SSMC3
Silver Spring, MD 20910

Payments can also be made electronically via FedWire.
Guidance for FedWire is attached.

NOTICE

The Order to which this Notice is attached describes the reasons for the assessment of the civil monetary penalty. It also specifies the amount owed and the date by which payment of the civil penalty is due and payable.

Under the Debt Collections Act of 1982, as amended (31 U.S.C. §§3701 – 3702E (2012)) and the Federal Claims Collection Standards (65 Fed. Reg. 70390 – 70406, November 22, 2000, to be codified at 31 C.F.R. Parts 900 – 904), interest accrues on any and all civil monetary penalties owed and unpaid under the Order, from the date of the Order until paid in full. The rate of interest assessed respondent is the rate of the current value of funds to the U.S. Treasury on the date that the Order was entered. However, interest is waived on any portion paid within 30 days of the date of the Order. See 31 U.S.C. §3717 and 31 C.F.R. §901.9.

The civil monetary penalty will be delinquent if not paid by the due date specified in the Order. If the penalty becomes delinquent, interest will continue to accrue on the balance remaining due and unpaid, and respondent will also be assessed both an administrative charge to cover the cost of processing and handling the delinquent claim and a penalty charge of six percent per year. However, although the penalty charge will be computed from the date that the civil penalty becomes delinquent, it will be assessed only on sums due and unpaid for over 90 days after that date. See 31 U.S.C. §3717 and 31 C.F.R. §901.9.

The foregoing constitutes the initial written notice and demand to respondent in accordance with Section 901.2 of the Federal Claims Collections Standards (31 C.F.R. §901.2(b)).

UNITED STATES OF AMERICA
DEPARTMENT OF COMMERCE

In the Matter of
WABTEC CORPORATION

Case No. 22-02

SETTLEMENT AGREEMENT

This Settlement Agreement is made by and between Wabtec Corporation (“Wabtec”), a domestic concern, and the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce (“BIS”), pursuant to Section 766.18(a) of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2023)) (the “Regulations”)¹.

¹ The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2023). The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601-4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which was extended by successive Presidential Notices, continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”).

On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801-4852 (“ECRA”). The Anti-Boycott Act of 2018 is a subpart of ECRA. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of ECRA’s date of enactment (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.

WHEREAS, Wabtec has filed a voluntary self-disclosure with BIS's Office of Antiboycott Compliance in accordance with Section 764.8 of the Regulations concerning the transactions at issue herein;

WHEREAS, BIS has notified Wabtec of its intention to initiate an administrative proceeding against Wabtec pursuant to the Regulations by issuing the Proposed Charging Letter dated October 26, 2023, a copy of which is attached hereto and incorporated herein by this reference;²

WHEREAS, Wabtec has reviewed the Proposed Charging Letter and the terms of this Settlement Agreement and the Order ("Order") that the Assistant Secretary of Commerce for Export Enforcement will enter if he approves this Settlement Agreement as the final resolution of this matter, and understands the terms of each document;

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

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

² The violations alleged occurred during the years 2018 through 2022. The Regulations governing the violations at issue are found in the 2018, 2019, 2020, 2021 and 2022 versions of the Code of Federal Regulations (15 C.F.R. Parts 730-774 (2018, 2019, 2020, 2021 and 2022)). The 2023 Regulations govern the procedural aspects of this matter.

WHEREAS, Wabtec admits committing the alleged conduct described in the Proposed Charging Letter; and

WHEREAS, Wabtec agrees to be bound by the Order, when entered;

NOW THEREFORE, Wabtec and BIS agree as follows:

1. Under the Regulations, BIS has jurisdiction over Wabtec with respect to the matters alleged in the Proposed Charging Letter.
2. BIS will impose a civil penalty on Wabtec in the amount of \$ 153,175. Wabtec will pay to the U. S. Department of Commerce within 30 days from the date of entry of the Order, and in accordance with the terms of the Order, when entered, the amount of \$ 153,175 in complete settlement of all matters set forth in the Proposed Charging Letter.
3. Compliance with the terms of this Settlement Agreement and the Order, when entered, including the full and timely payment of the civil penalty agreed to in paragraph 2, is hereby made a condition of the granting, restoration, or continuing validity of any export license, license exception, permission or privilege granted, or to be granted, to Wabtec.
Failure to comply fully with the terms of this Settlement Agreement and the Order, when entered, may result in the denial of all of Wabtec's export

privileges for a period of one-year from the date of issuance of any such denial order.

4. Subject to the approval of this Settlement Agreement, pursuant to paragraph 8 hereof, Wabtec hereby waives all rights to further procedural steps in this matter (except with respect to any alleged violation of this Settlement Agreement or the Order, when entered) including, without limitation, any right to:
 - A. An administrative hearing regarding the allegations in the Proposed Charging Letter;
 - B. Request a refund of any civil penalty paid by Wabtec pursuant to this Settlement Agreement and the Order, when entered; or
 - C. Seek judicial review or otherwise contest the validity of this Settlement Agreement or the Order, when entered.

Wabtec also waives and will not assert any Statute of Limitations defense, and the Statute of Limitations will be tolled, in connection with any violation of the Act or the Regulations arising out of the transactions identified in the Proposed Charging Letter, or in connection with collection of the civil penalty, or enforcement of this Settlement Agreement and the Order, when entered, from the date of entry of the Order until the date that Wabtec has paid in full the civil penalty as set forth in Paragraph 2, above.

5. BIS agrees that upon compliance in full with the terms of this Settlement Agreement and the Order, if entered, BIS will not initiate any further administrative proceeding against Wabtec with respect to any violation of Part 760 of the Regulations arising out of the transactions set forth in the Proposed Charging Letter.
6. Wabtec understands that BIS will make the Proposed Charging Letter, this Settlement Agreement, and the Order, when entered, available to the public.
7. This Settlement Agreement is for settlement purposes only. Therefore, if this Settlement Agreement is not accepted and the Order not entered by the Assistant Secretary of Commerce for Export Enforcement, neither BIS nor Wabtec may use this Settlement Agreement in any administrative or judicial proceeding, and BIS and Wabtec shall not be bound by the terms contained in this Settlement Agreement in any subsequent administrative or judicial proceeding.
8. This Settlement Agreement constitutes and contains the entire agreement and understanding of BIS and Wabtec.

No agreement, understanding, representation or interpretation not contained in this Settlement Agreement may be used to vary or otherwise alter or affect the terms of this Settlement Agreement or the Order, when entered, nor shall this Settlement Agreement bind, constrain or otherwise limit any action by any other

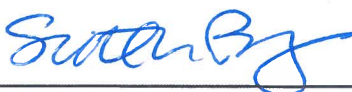
agency or department of the United States Government with respect to the facts and circumstances herein addressed.

9. This Settlement Agreement shall become binding on BIS and Wabtec only when approved by the Assistant Secretary of Commerce for Export Enforcement by entering the Order, which shall have the same force and effect as a decision and Order issued after a full administrative hearing on the record.

10. Each signatory affirms that he/she has authority to enter into this Settlement Agreement and to bind his/her respective party to the terms and conditions set forth herein.

11. If any provision of the Settlement Agreement is found to be unlawful, only the specific provision in question shall be affected and the other provisions shall remain in full force and effect.

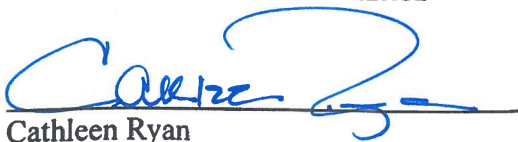
WABTEC CORPORATION



Scott W. Brady
Chief Compliance Officer

DATE: 01/12/2024

U.S. DEPARTMENT OF COMMERCE



Cathleen Ryan
Director
Office of Antiboycott Compliance

DATE: 23 JANUARY 24



UNITED STATES DEPARTMENT OF COMMERCE
Bureau of Industry and Security
Washington, D.C. 20230

PROPOSED CHARGING LETTER

26 October 2023

Wabtec Corporation
2901 E Lake Road
Building 14-371
Erie, PA 16531

Attention: Michael Watson,
Deputy Chief Compliance Officer

Case No 22.02

Gentlemen/Ladies:

We, the Office of Antiboycott Compliance, Bureau of Industry and Security, United States Department of Commerce (“BIS”), have reason to believe that you, Wabtec Corporation, have committed forty-three violations of the Export Administration Regulations (currently codified at 15 C.F.R. Parts 730-774 (2023)) (the “Regulations”)¹.

We charge that you committed forty-three violations of Section 760.5 of the Regulations, in that, on forty-three occasions, you failed to report to the Department of Commerce your receipt of a request to engage in a restrictive trade practice or boycott, as required by the Regulations.

¹ The violations alleged occurred during the years 2018 through 2022. The Regulations governing the violations at issue are found in the 2018 through 2022 versions of the Code of Federal Regulations (15 C.F.R. Parts 730 – 774 (2018, 2019, 2020, 2021 and 2022)). The 2023 Regulations govern the procedural aspects of this matter.

The Regulations are currently codified in the Code of Federal Regulations at 15 C.F.R. Parts 730-774 (2022). The Regulations originally issued under the Export Administration Act of 1979, as amended, 50 U.S.C. §§ 4601- 4623 (Supp. III 2015) (“the EAA”), which lapsed on August 21, 2001. The President, through Executive Order 13,222 of August 17, 2001 (3 C.F.R., 2001 Comp. 783 (2002)), which has been extended by successive Presidential Notices, including the Notice of August 6, 2021 (86 Fed. Reg. 43901 (Aug. 10, 2021)), continued the Regulations in full force and effect under the International Emergency Economic Powers Act, 50 U.S.C. § 1701, et seq. (2012) (“IEEPA”).

On August 13, 2018, the President signed into law the John S. McCain National Defense Authorization Act for Fiscal Year 2019, which includes the Export Control Reform Act of 2018, 50 U.S.C. §§ 4801- 4852 (“ECRA”). The Anti-Boycott Act of 2018 is a subpart of ECRA. While Section 1766 of ECRA repeals the provisions of the EAA (except for three sections which are inapplicable here), Section 1768 of ECRA provides, in pertinent part, that all rules and regulations that were made or issued under the EAA, including as continued in effect pursuant to IEEPA, and were in effect as of the date of enactment of ECRA (August 13, 2018), shall continue in effect according to their terms until modified, superseded, set aside, or revoked through action undertaken pursuant to the authority provided under ECRA.



We allege that:

You, Wabtec Corporation, are, and at all times relevant were, a domestic concern organized under the laws of the United States and doing business in the State of Pennsylvania. As such, Wabtec Corporation is a United States person as defined by §760.1(b) of the Regulations.

During the period February 2018 through July 2022, you engaged in transactions involving the sale and/or transfer of goods or services (including information) from the United States to Pakistan, activities in the interstate or foreign commerce of the United States, as defined in Section 760.1(d) of the Regulations.

Charges 1 - 43 (15 C.F.R. §760.5 – Failing to Report the Receipt of a Request to Engage in a Restrictive Trade Practice or Foreign Boycott Against a Country Friendly to the United States)

In connection with the activities referred to above, during the period February 2018 through July 2022, on forty-three occasions, you received a request, as described in Table A, which is attached and incorporated herein by this reference, to take an action which would have the effect of furthering or supporting a restrictive trade practice or unsanctioned foreign boycott.

Section 760.5 of the Regulations requires United States persons to report to the Department of Commerce their receipts of such requests. You failed to report to the Department of Commerce your receipts of these requests.

By failing to report your receipts of these requests, described in Table A, as directed by Section 760.5 of the Regulations, you are in violation of Section 760.5. We therefore charge you with forty-three violations of Section 760.5 of the Regulations.

Accordingly, you are hereby notified that administrative proceedings are instituted against you pursuant to Part 766 of the Regulations for the purpose of obtaining an order imposing administrative sanctions.²

² Administrative sanctions may include any or all of the following:

- a) The alleged violations occurred during the years 2018 through 2022.
For alleged violations that occurred prior to August 13, 2018, the date of enactment of ECRA, the applicable sanctions are provided for under IEEPA which includes a maximum civil penalty of up to the greater of \$ 356,579 per violation or twice the value of the transaction that is the basis of the violation (see 15 C.F.R. §§ 6.3(c)(4), 6.3(c)(6), 6.4). The amount is subject to annual increases pursuant to the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74, enacted on November 2, 2015.
For alleged violations occurring on or after the enactment of ECRA on August 13, 2018, the maximum civil penalty is \$ 353,534. See 50 U.S.C. § 4819 (prescribing civil monetary penalty amount for ECRA violations); 15 C.F.R. §§ 6.3(c)(4), 6.4 (adjusting civil monetary penalty amount for inflation).
- b) Denial of export privileges (see §764.3(a)(2) of the Regulations)
- c) Exclusion from practice before BIS (see §764.3(a)(3) of the Regulations); and/or
- d) Any other liability, sanction, or penalty available under law.

You are entitled to an agency hearing on the record as provided in Section 766.6 of the Regulations. If you wish to have a hearing on the record, you must file a written demand for one with your answer. You are entitled to be represented by counsel or other authorized representative who has power of attorney to represent you. See Sections 766.3(a) and 766.4 of the Regulations. You may also seek settlement without a hearing. See Section 766.18 of the Regulations.

Under the Small Business Regulatory Enforcement Flexibility Act, you may be eligible for assistance from the Office of the National Ombudsman of the Small Business Administration in this matter.³

If you fail to answer the allegations contained in this letter within thirty (30) days after service as provided in Section 766.6, such failure will be treated as a default under Section 766.7.

As provided in Section 766.3 of the Regulations, we are referring this matter to the Administrative Law Judge. Pursuant to an Interagency Agreement between BIS and the U.S. Coast Guard, the U.S. Coast Guard is providing administrative law judge services, to the extent that such services are required under the Regulations, in connection with the matters set forth in this letter.

Therefore, in accordance with the instructions in Section 766.5(a) of the Regulations, your answer should be filed with:

U.S. Coast Guard ALJ Docketing Center
40 South Gay Street
Baltimore, Maryland 21202-4022
Attention: Administrative Law Judge

Also, in accordance with the instructions in Section 766.5(b) of the Regulations, a copy of your answer should be served on the Bureau of Industry and Security at the following address:

Office of the Chief Counsel for Industry and Security
U.S. Department of Commerce
Room H-3839
14th Street & Constitution Avenue, NW
Washington, D.C. 20230

Sincerely,

Cathleen Ryan
Director
Office of Antiboycott Compliance

Attachments

³ To determine eligibility and get more information, please see: <http://www.sba.gov/ombudsman/>.

TABLE A
Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
1	Tender # PR No.19/Spl-29/1-2020	05.15.21	07.31.21	Pakistan	15. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
2	Tender # PR 19/0146/UX/AGE-30/1-2020	01.18.21	04.30.21	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED.
3	Tender # PR 19/0148/Misc-Filed/1-2020	02.09.21	04.30.21	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED. ...
4	Diesel Bulletin No III # No. SR-100 DEL/New (DB-III)	03.29.21	04.30.21	Pakistan	12. OTHER GENERAL CONDITIONS 1) NEITHER ANY IMPORT WILL BE PERMISSIBLE FROM ISRAEL NOR WILL GOODS OF ITS ORIGIN FROM ANY COUNTRY BE CONSIDERED
5	Tender # PR 19/0138/UX/Traction Motor/1-2020	10.14.20	01.31.21	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED.
6	Tender # PR 19/0142/RRC/Filters/1-2020	01.04.21	04.30.21	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
7	Tender # PR No.19/KCR-SPI-01/1-2020	09.23.20	10.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL& INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
8	Tender # PR 01/TM/MGPR/SR-100/ New/2020	04.08.20	07.31.20	Pakistan	3. OTHER CONDITIONS..... D. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
9	# PR 02/T&P/SR100/New/ 2020	08.04.20	10.31.20	Pakistan	3. OTHER CONDITIONS..... D. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
10	Tender # PR No.12/0007/00-0/1- 2020	10.05.20	01.31.21	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL& INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
11	Tender # PR 19/0122-A/RRRC/CB/ 1-2020	07.25.20	10.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
12	Tender # PR 19/0136/RRRC/Brake Shoe/1-2020	07.09.20	10.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
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FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
 Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
13	Tender # PR 19/0137/RRRC/C.B/ 1-2020	09.07.20	10.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
14	Tender # PR SR/100DEL/New (DB-II)	09.17.20	10.31.20	Pakistan	9. OTHER CONDITIONS.... E. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
15	Tender # PR SR/100DEL/New (DB-I)	06.20.20	07.31.20	Pakistan	9. OTHER CONDITIONS.... E. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
16	Tender # PR 19/0132/00-0/1-2020	05.29.20	07.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
17	Tender # PR 19/0116/RRRC/GEU- 40/1-2019	03.10.20	04.30.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation *	Boycotting Country	Boycott Request
18	Tender # PR 19/0121/T.M Parts/1-2019	04.20.20	07.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
19	Tender # PR 19/0123/00-0/1-2019	04.20.20	07.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
20	Tender # PR 19/0126/00-0/1-2020	03.18.20	04.30.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
21	Tender # PR 19/0129/UTEX/Fuel Injector Assy/1-2020	04.03.20	07.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
22	Tender # PR No. 49/75 DEL/2020	03.16.20	04.30.20	Pakistan	2. OTHER CONDITIONS... D. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
23	Tender # PR No. 19/Spl-25/1-2019	05.01.19	07.31.19	Pakistan	15. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND SIMILARLY OFFER OF GOODS OF ISRAEL ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
24	Tender # PR No. 19/Spl-26/1-2019	10.01.19	01.31.20	Pakistan	15. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
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FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

25	Tender # PR 19/0115/00-0/1-2019	04.19.20	07.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
26	# PR 19/0117/00-0/Brake Shoes/1-2019	06.27.19	07.31.19	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
27	# PR 19/0119/Brake Shoe/ 1-2019	11.27.19	01.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
28	Tender # PR 19/0122/RRR/CB/1- 2019	11.27.19	01.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
29	Tender # PR No. 10/0002/01-0/1- 2019	11.01.19	01.31.20	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
30	Tender # PR SPL-23 Spares	02.20.18	04.30.18	Pakistan	15. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND SIMILARLY OFFER OF GOODS OF ISRAEL ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
31	Tender # PR 19/0107/RRR/Filters/1- 2017	02.01.18	04.30.18	Pakistan	20. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

* As provided in Section 760.5(b)(4)(i) of the Regulations, where the person receiving the request is a United States person located in the United States, each report of requests must be postmarked or electronically date-stamped by the last day of the month following the calendar quarter in which the request was received.

TABLE A
Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
32	Tender # PR 19/0108/Frame Head, Filters, Gears Etc/1-2017	04.01.18	07.31.18	Pakistan	19. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
33	Tender # PR 19/0109/N.Q Items/1- 2018	04.12.18	07.31.18	Pakistan	19. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
34	Tender # PR 19/0101-A/MEDE-62/ 1-2018	05.11.18	07.31.18	Pakistan	19. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
35	Tender # PR 19/0102-A/RRRC/Misc Items/1-2018	05.11.18	07.31.18	Pakistan	20. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
36	Tender # PR 19/0111/GEU-40/1-2018	06.21.18	07.31.18	Pakistan	14. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
37	Tender # PR 19/0154/00-0/1-2021	11.10.21	01.31.22	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

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Schedule of Alleged Violations of Section 760.5
FAILURE TO REPORT RECEIPTS OF BOYCOTT REQUESTS

WABTEC CORPORATION
Case No. 22-02

Item #	Reference	Date Request Received	Date Reporting Violation*	Boycotting Country	Boycott Request
38	Tender # PR 10/0002/01-0/1-2019	11.29.21	01.31.22	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
39	Tender # PR 19/0162/Filters/1-2021	01.06.22	04.30.22	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
40	Tender # PR SR-100 DEL/New (DB-V)	05.24.22	07.31.22	Pakistan	9. OTHER CONDITIONS.... E. NO IMPORT IS PERMISSIBLE FROM ISRAEL AND OFFER OF GOODS OF ISRAELI ORIGIN FROM ANY COUNTRY SHALL NOT BE CONSIDERED
41	Tender # PR No. 19/Spl-28/1-2021	05.06.22	07.31.22	Pakistan	15. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
42	Tender # PR 19/0166/00-0/1-2021	06.15.22	07.31.22	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED
43	Tender # PR 19/0151/UJX/GEU-40/1-2021	07.15.22	10.31.22	Pakistan	21. NO IMPORT WILL BE PERMISSIBLE FROM ISRAEL & INDIA... GOODS OF THIS ORIGIN FROM ANY COUNTRY WILL NOT BE CONSIDERED

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