

Davis Polk Client Memorandum: Commerce Department Extends Huawei General License, Adds More Huawei Affiliates to Entity List

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The Department of Commerce added 46 more non-U.S. affiliates of Huawei Technologies Co., Ltd. to the Bureau of Industry and Security (BIS) Entity List, joining Huawei and 68 of its non-U.S. subsidiaries that were put on the list in May. The Commerce Department also extended a temporary general license permitting certain exports, reexports, and transfers to Huawei and its listed affiliates through November 18, 2019, and it made certain clarifying changes to the temporary general license.

Any exports, reexports or in-country transfers of items subject to the Export Administration Regulations to any of the listed Huawei entities continue to require a license, with the exception of transactions explicitly authorized by the amended temporary general license and eligible for export, reexport or transfer (in-country) prior to May 16, 2019, without a license or under a license exception. BIS will continue to review license applications under a presumption of denial.

Please see our [client memorandum](#) for more details.