



DEPARTMENT OF THE TREASURY  
WASHINGTON, D.C. 20220

Case No. CT-14564

SEP 15 2009

Robert C. Whitley, CTC  
President  
United States Tour Operators Association  
275 Madison Avenue South  
Suite 2014  
New York, NY 10016

RE: Letter dated May 22, 2009

Dear Mr. Whitley:

This is in response to your letter on behalf of the United States Tour Operators Association ("USTOA") requesting authorization to engage in travel-related transactions involving Cuba for the purpose of conducting professional research regarding the overall economic and financial aspects related to travel to Cuba. You state that USTOA is a national association which represents the interests of its 153 members from 23 states. In addition, you state that USTOA serves to promote and publicize efficient, ethical, and progressive business practices and procedures for the wholesale tour/travel package industry, including exploring advances in technology and new ideas in public relations, advertising, and employer and employee relationships. Finally, you indicate that you will send USTOA members and staff experts to Cuba to conduct research that will include a full work schedule of meetings with the Ministry of Foreign Trade, Cuban Chamber of Commerce, Ministry of Tourism, and other entities involved in travel to Cuba.

The Cuban Assets Control Regulations, 31 C.F.R. Part 515 (the "Regulations"), administered by the U.S. Department of the Treasury's Office of Foreign Assets Control, prohibit all persons subject to the jurisdiction of the United States from dealing in property in which Cuba or a Cuban national has an interest. This prohibition includes all Cuba travel-related transactions unless such transactions are authorized in accordance with current licensing policy set forth in § 515.560(a).

Pursuant to § 515.564(b) of the Regulations, specific licenses may be issued on a case-by-case basis authorizing travel-related transactions set forth in § 515.560(c) and such additional transactions as are directly incident to professional research and professional meetings that do not qualify for the general license in § 515.564(a) of the Regulations. We have enclosed the relevant licensing criteria contained in our *Comprehensive Guidelines for License Applications to Engage in Travel-Related Transactions Involving Cuba* (the "Application Guidelines").

We have reviewed your request and determined that the issuance of a specific license to the United States Tour Operators Association is inconsistent with current U.S. policy inasmuch as the nature of the research described in your application appears to be for commercial purposes that are contrary to current policy. Accordingly, your application is hereby denied.

For information concerning the categories of travel for which licenses may be issued, please refer to the Application Guidelines on our Internet website at [www.treas.gov/ofac](http://www.treas.gov/ofac).

Sincerely,

Jeffrey R. Braunger  
Program Manager, Cuba Travel  
Office of Foreign Assets Control

Enclosure