


International Students as Startup Founders in the United States

The George Washington University
Office of Entrepreneurship
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Overview

- Many of the most innovative and fastest growing companies in the U.S. were founded by foreign nationals
 - Mike Krieger – Instagram co-founder – Brazilian entrepreneur, software engineer – attended Stanford University (F-1), 1 year OPT after graduation, H-1B visa, 2011/2012 obtained his Green card
 - Renaud Laplanche – Lending Club co-founder – French entrepreneur, lawyer, MBA – came to the U.S. on a visa for temporary stay to work at a law office, started his own company
 - Michal Tsur – Kaltura (video platform services) co-founder – Israeli entrepreneur, doctoral degree in game theory from NYU, post-doctoral degree in evolutionary game theory from Yale
 - Peter Weijmarshausen – Shapeways (3D Printing Service and Marketplace) (spin-off of Royal Philips Electronics) co-founder – Dutch founded, New York based – Dutch entrepreneur
 - Jon Froda – Podio (collaborative work platform) co-founder – Danish entrepreneur

Overview (Continued)

- Malcome Ong – Skillshare co-founder, Entrepreneur-in-Residence (EIR) at 500 startups – Indonesian born – B.S. in Computer Science with a double major in Business Administration from Carnegie Mellon University
- Alexander Torrenegra – Co-founder of Bunny, Inc., Terrenegra Labs, and Dashbell – Colombian born – Associates degree in Computer Science from Miami Dade College, Stanford University Leadership Program
- Other foreign born startup co-founders:
 - Sergey Brin – Google – Russia
 - Andre Grove – Intel – Hungary
 - Steve Chen – YouTube – Taiwan
 - Jerry Yang – Yahoo – Taiwan

Overview (Continued)

- Options for Entrepreneurs – Changing Status from F-1 to [?]
 - H-1B Specialty Occupation
 - Treaty (E) Visas
 - L-1 Intracompany Transferee
 - O-1A Extraordinary Ability and Achievement
 - EB-5 Immigrant Investor Visa
- New Opportunities for Investors and Entrepreneurs – Obama’s Nov. 2014 Executive Action

The Entrepreneurial Student's Options while in School

- Employment
 - 20 hours per week on-campus while school is in session and while enrolled full-time
 - After nine months in F-1 status – may seek authorization from USCIS to work off-campus
 - Need to obtain social security number
- Curricular Practical Training (CPT)
 - Internships, work/study programs, other work experience
 - Curriculum required training – academic purpose
- Option Practical Training (OPT)
 - OPT employment must be related to studies
 - 12 months – must obtain Employment Authorization Document (EAD) from USCIS
 - Can Receive 17 month extension if STEM degree and employer uses E-Verify
 - Can receive an additional 12 months if advance to a higher educational level
 - Note: if you received CPT, then not eligible for OPT (CPT counts toward 12 m limit)

H-1B Specialty Occupation

- Some entrepreneurs started as H-1B workers at **other companies**
 - E.g., Mike Krieger's path: worked as an intern during F-1 status, worked under OPT for 1 year after graduation from Stanford University, then H-1B nonimmigrant worker for several years at multiple companies (User Experience Designer and Engineer at Meebo, Inc.) before co-founding Instagram in 2010
 - Requirements for option of working as an H-1B at other companies
 - Job Offer (employer must sponsor your H) – part time or full time
 - Bachelor's degree or higher
 - Determine U.S. equivalency of foreign degree
 - Combination of education and experience
 - Specialty Occupation
 - Job requires Bachelor's degree or higher in a specific field
 - Prevailing Wage

H-1B Specialty Occupation (Continued)

- Procedure
 - File Labor Condition Application
 - File H-1B Petition with USCIS
 - Change of Status (F-1 to H-1B) or Consular Visa Issuance
 - Processing Times
 - 3 to 5 months
 - 15 days or less with premium processing
 - Timing
 - April 1st filing date
 - October 1st start date
- Length of Approval and Extensions
 - 3 year initial approval and 3 year extension
 - 6 year maximum – any combination of employers
 - Extension beyond 6 years
 - Recapture time out of the United States
 - 1 year extensions if Permanent Labor Certification filed (PERM)
 - Immigrant petition (I-140) must be filed one year before the expiration of H status
 - 3 year extensions if immigrant petition (I-140) approved and there is a quota backlog (i.e., your priority date is not current)

H-1B Specialty Occupation (Continued)

- H-1B Portability
 - Present of prior H-1B
 - Commence employment upon new employer filing petition
- Spouses
 - H-4 cannot work (no work authorization)
 - Note: Per Obama's November 2014 Immigration Action, some H-1B spouses (H-4 status) may soon get work authorization
- H-1B Quota
 - 65,000 visas issued per year
 - Separate quota for US-educated advance degree holders
 - 20,000 visas
 - Separate options for Canada, Mexico, Australia, Chile, and Singapore
 - TN-1, E-3, H-1B1
 - Not Subject to Quota
 - Universities
 - Nonprofit institutions affiliated with universities
 - Employed at university

H-1B Specialty Occupation (Continued)

- Nonprofit government research organization
- Concurrent employment
- Previous H-1B
- **Start Your Own Business and Apply as H-1B Employee (owner/employee)**
 - Must establish company with employer tax I.D. number (EIN)
 - How to demonstrate the “**employer-employee relationship**” – difficult task
 - Petitioner (entity) has the “**right to control**” beneficiary’s (owner/co-founder) employment (i.e., when, where, and how the beneficiary performs the job)
 - Beneficiary must be a W-2 employee
 - Petitioner right of control over employee
 - i.e., can get fired
 - e.g, Steve Jobs (cofounder of Apple) was fired by Apple
 - Petitioner provides evidence that there is a separate Board of Directors which has the ability to hire, fire, pay, supervise or otherwise control the beneficiary’s employment.

H-1B Specialty Occupation (Continued)

- If the employer-employee relationship is not adequately demonstrated, USCIS may issue a request for evidence (RFE)
- List of Factors to demonstrate “right to control” (no one decisive factor)
 - Does the petitioner supervise the beneficiary and is such supervision off-site or on-site?
 - If the supervision is off-site, how does the petitioner maintain such supervision, i.e., weekly calls, reporting back to main office routinely, or site visits by the petitioner?
 - Does the petitioner have the right to control the work of the beneficiary on a day-to-day basis if such control is required?
 - Does the petitioner provide the tools or instrumentalities needed for the beneficiary to perform the duties of employment?
 - Does the petitioner hire, pay, and have the ability to fire the beneficiary?
 - Does the petitioner evaluate the work-product of the beneficiary, i.e., progress/performance reviews?
 - Does the petitioner claim the beneficiary for tax purposes?
 - Does the petitioner provide the beneficiary any type of employee benefits?
 - Does the beneficiary use proprietary information of the petitioner in order to perform the duties of the employment?
 - Does the beneficiary produce end-product that is directly linked to the petitioner’s line of business?
 - Does the petitioner have the ability to control the manner and means in which the work product of the beneficiary is accomplished?

H-1B Specialty Occupation (Continued)

- Documentation to Establish the Employer-Employee Relationship (combination of these or similar types of evidence)
 - This is in addition to H-1B regulatory requirements (LCA)
 - Itinerary of services (with specific dates, addresses)
 - Copies of leases for petitioner place of business and beneficiary's place of employment
 - Copy of Employment Agreement/Contract/Offer Letter
 - Copies of signed business contractual agreements, service agreements, letters between petitioner and authorized officials of the end-client companies
 - Description of who will supervise the beneficiary and their duties, salary, wages
 - Corporate financial information (business plan/financial projections) – capital investments to run the business and to pay the employee (and beneficiary) salary
 - Copy of the position description, other documentation that describes the skills required to perform the job, the product to be developed or service to be provided
 - Provisions of the employee benefits
 - Tax treatment of the beneficiary in relation to the petitioner
 - Description of the performance review process
 - Copy of the petitioner's organizational chart(s), demonstrating the beneficiary's supervisory chain

Other Nonimmigrant (Temporary) Options

- Treaty (E) Visas – Based Upon Bilateral Treaties with U.S.
 - See Addendum for complete list

 - Treaty Traders (**E-1**)
 - “Substantial” import or export
 - “Substantial” means continuous flow of trade b/w U.S. and the treaty country involving numerous transactions
 - Monetary value of individual items is a relevant factor, but greater weight given to number of transactions
 - Majority between U.S. and treaty country – i.e., More than 50% of the trade must be between the U.S. and the treaty country
 - Can be manager, supervisor, or “essential skill” employee
 - can trade on your own behalf (owner/founder)
 - or as employee of a treaty trader

Other Nonimmigrant (Temporary) Options

■ Treaty (E) Visas (Cont'd)

- Treaty Investors (**E-2**)

■ “Substantial” investment

- No exact amount, but note: investment must be substantial in relation to the total cost of purchasing or creating the type of enterprise involved and it must be sufficient to ensure the investor’s commitment to developing the enterprise.
- Varies depending upon type of investment
- Relevant issues
 - Amount of investment (but usually over \$100,000)
 - Number of employees (must create jobs, but can be small #)
 - Needs of Business
 - Likely profitability and growth potential
 - Business plan and financial projects are critical
 - Each consulate has a very lengthy required documentation checklist

Other Nonimmigrant (Temporary) Options

- Treaty (E) Visas (Cont'd)
 - A cover letter, describing the enterprise and the beneficiary. The letter must address how the enterprise and employee meet the E-2 visa requirements
 - A business plan for the next 5 years and also tax returns for the past 3 years if an existing enterprise
 - Evidence of company, ownership and incorporation, (Articles of Inc.)
 - Demonstrate the applicant has invested or is in the process of investing, such as, contracts, promissory notes, leases, purchase contracts, bank statements, etc.
 - Demonstrate the enterprise is a real and operating commercial enterprise, such as, annual income statements, catalogs, business invoices and corresponding bank, receipts, purchases, employees, etc.

Other Nonimmigrant (Temporary) Options

- Treaty (E) Visas (Cont'd)
 - Demonstrate the applicant's investment is substantial and proportionate to the value of the enterprise. **Start up costs must be identified;** Demonstrate the investment is more than a marginal one solely for earning a living
 - Demonstrate the applicant, if an employee, is destined to an Executive/Supervisory position (if company can prove it is maintaining E-visa status include organizational chart) or possesses skills essential to the firm's operations in the United States
 - Benefits of E Visa
 - Spouses of treaty traders and investors allowed work authorization
 - Initial Length – up to 5 years
 - Extensions – two-year increments as long as you continue working in the same capacity; unlimited extensions
 - But note: no official path to a permanent residence

Other Nonimmigrant (Temporary) Options

- Treaty (E) Visas (Cont'd)

- Benefits of E Visa

- Prior employment overseas is not required
- Permanent Residence – can be EB-1 after 1 year
- Procedure – apply directly at consulate not with USCIS

E-3 Visa – Australian-United States Free Trade Agreement

- Similar to H-1B, but only available for Australian citizens
- Requirements: LCA, post notice of job, prevailing wage
- Period of two years and renewable indefinitely
- Spouse has work authorization

Intracompany Transferee (L-1) Visas

- National of any country
- No quota
- Length of Visa and Requirements
 - The initial period for this visa is 1 year if you are setting up a new company in the U.S., but it can be renewed for up to a maximum of 5-7 years
 - Established business 3 years
 - Maximum length 5 or 7 years
 - 7 years – L-1A Intracompany Transferee Executive or Manager
 - 5 years – L-1B Specialized Knowledge

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Do you qualify?
 - Are you a manager, executive, or a “specialized knowledge” employed by a foreign business entity?
 - Have you been working for at least 1 continuous year within the past 3 years?
 - Is your company abroad related to the U.S. business you will establish? Will the foreign entity continue to do business?
 - Will you be coming to the U.S. to open a new office location for your company? Will the new office be active and operating shortly after you arrive in the U.S. as an L-1?

Intracompany Transferee (L-1) Visas (*Cont'd.*)

■ Requirements

- Demonstrate that the new business in the U.S. has a **qualifying relationship** with a foreign company
 - Documentary evidence to show requisite corporate relationship
 - Articles of incorporation showing common ownership of the U.S. and foreign entities
 - Business licenses or other documents showing common ownership of the U.S. entity
 - Annual reports describing the corporate structure
 - Contracts or other documents detailing the affiliate relationship
 - Corporate filings in the United States or abroad describing the corporate relationship
 - Any other evidence demonstrating ownership and control over the U.S. and foreign entities (i.e., stock purchase agreements, voting rights agreements, capitalization table, term sheet)

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Filing as an *affiliate*
 - Definition - one of two subsidiaries owned and controlled by the same parent or individual, or the same group of individuals, each owning and controlling the same share or proportion of each entity
 - Documentation - detailed list of the owners of the foreign and U.S. companies, including percentage of ownership, along with supporting documentation
- Filing as a *subsidiary*
 - Definition: entity of which a parent
 - Owns, directly or indirectly, more than half the entity and controls the entity, or
 - Owns, directly or indirectly, half the entity and controls the entity, or
 - Owns, directly or indirectly, 50 percent of a 50-50 joint venture and has equal control and veto power over the entity, or
 - Owns, directly or indirectly, less than half of the entity, but in fact controls the entity
 - Documentation - detailed list of the owners of the foreign and U.S. companies, including the percentage of ownership, along with supporting documentation

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Demonstrate that you have worked the required amount of time abroad
 - Documentation evidencing your overseas **employment for 1 out of the last 3 years**
 - Pay stubs
 - Payroll records
 - Tax returns that show employment
 - Evidence of work product
 - Resume
 - Detailed support letter illustrating requisite employment overseas
 - Demonstrate that your overseas **employment was in a qualifying capacity**
 - Documentation evidencing that your overseas employment was in a managerial, executive or specialized knowledge capacity

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Organization charts showing your position
 - Patents or other evidence of the company's technology, products or services that are based on your work
 - Performance reviews
 - Loans/financing on behalf of the company
 - Organizational job descriptions for your position and those positions that reported above and/or below you, if applicable
 - Resume describing your job accomplishments
 - Detailed support letter

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Demonstrate that sufficient **physical space is secured for new office**
 - Documentary Evidence of physical space
 - Signed lease agreement
 - Mortgages or other proof of real estate purchase
 - Pictures of the facility
 - Business plan, marketing materials, or other descriptions of the business connecting the activity of the business with the space required
 - If filing to open a new office
 - Provide copy of business plan or executive summary that shows the size of the U.S. investment
 - Detailed support letter explaining how location is sufficient for your business

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- Extensions after one year (i.e., after the start up year)
 - New office must be active and operating within one year after the L-1's admission to the U.S. if requesting an extension of stay
 - “operating” examples – hiring additional employees, fulfilling contract orders, having a revenue stream, holding inventory
 - New office must be sufficiently active to support manager/executive
 - In year 1, manager may engage in more hands-on tasks
 - After year 1, manager/executive must focus primarily on managerial and executive tasks in order to obtain extension of L-1 visa

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- How to demonstrate that new office is **fully functioning**
 - Purchase orders, contracts or other evidence of commercial activity
 - Payroll records for employees hired
 - Bank statements
 - Financial reporting documents showing monthly income
 - Continued venture capital or other third party investment contribution based on achieved milestones
 - Media coverage of the business
 - Position descriptions providing the roles and responsibilities of all current employees, or other evidence which clearly demonstrates how the manager or executive is relieved of non-qualifying duties
- Benefits of L-1 Visa
 - L-1 Spouse work authorization
 - Investment – any amount
 - Permanent Residence
 - L-1A eligible to apply for EB-1 after one year
 - Can be from any geographical area

Intracompany Transferee (L-1) Visas (*Cont'd.*)

- L-1 Start-up issues/requirements to discuss
 - Place of business
 - Employees
 - Capitalization
 - Need for “manager”
 - Business plan and financial projections

Extraordinary Ability (O-1) Visas

- Extraordinary ability in the sciences, arts, education, business, or athletics
- Demonstrated by national or international acclaim
 - in order to prove sustained national or international acclaim must show either
 - receipt of major international award (e.g., Nobel Prize, Olympic Gold Medal, Pulitzer Prize)

OR

Extraordinary Ability (O-1) Visas (*Cont'd.*)

- list of factors in the regulations – must prove **3 of the following factors**
 - Receipt of lesser nationally or internationally recognized awards
 - Membership in associations which require outstanding achievements of their members, as judged by recognized national and international experts in their disciplines or fields
 - Published material about you in professional or major trade publications or other major media, relating to your work in the field
 - Participation (individually or on a panel) as a judge of the work of others in the same or allied field (e.g., peer review / manuscript review work)
 - Original scientific, scholarly, artistic, athletic, or business-related contributions of major significance in the field (e.g., conference presentations)

Extraordinary Ability (O-1) Visas (*Cont'd.*)

- Authorship of scholarly articles in the field, in professional or major trade publications or other major media
- Performance in a leading or critical role for organizations or establishments that have a distinguished reputation
- High salary or other significant remuneration for services
- Commercial success in the performing arts
- Display of work at artistic exhibitions or showcases
- Written Advisory Opinion Required
 - From U.S. peer group
 - Of nature of the work that will be completed by the person, and
 - Qualifications of the noncitizen

Extraordinary Ability (O-1) Visas (*Cont'd.*)

- “One of a few at the top of his/her peers”
- Must be employer or agent
 - Can be own company
- Length of Visa
 - 3 years
 - 1 year extensions
 - Can extend indefinitely
- Benefits of O-1 Visa
 - No bachelor’s degree, or degree of any kind, is required for O-1
 - Dual intent (clear path to permanent residence)

Investment (EB-5) – Permanent Residence Status

- Potential quota delay for Chinese nationals
- Amount of investment
 - \$1,000,000 or
 - \$500,000 in “targeted employment area”
- Type of business
 - Active business
 - New business or expansion of existing business
 - 40% increase in net worth or number of employees
- Employment Creation
 - 10 new or 10 additional full-time jobs
 - U.S. citizens or permanent residents
 - Saving 10 jobs in “troubled business”

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Lawful source of funds
 - Extensive documentation required
 - Can be gift
 - Must prove giftor's source of funds
 - Can borrow money
- Nature of investor's relationship to the business
 - Do not have to be an employee (but can be)
 - Do not have to be the owner (but can be)
 - Cannot be a purely passive owner
 - Limited partner is okay

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Two Paths for EB-5
 - Individual investment
 - Characteristics:
 - If you want to start and/or manage a business
 - If your business will be creating employment up front
 - Investment is the driving force of your desire to come to the U.S.
 - You want to have control over your investment
 - You want to maximize profits from your investment
 - Requirements
 - Amount of Investment
 - \$1,000,000
 - \$500,000 if investor can prove that the investment is in rural area or in an area that has experienced unemployment of at least 150% of the national average rate

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Job Creation
 - Proof of full-time employment as direct employees (not independent contractors) of 10 U.S. workers
 - Requisite employment does not have to be created at the time of petition approval, but must be created within the 2 year period before the necessity of filing a condition removal petition
- Management
 - Investor must be engaged in management of the enterprise rather than maintaining a purely passive role
- Source of funds
 - Requires extensive documentation
- Timing
 - Petition approved in 12 to 14 months of filing
 - EB-5 quota category is current, which means can obtain employment authorization and travel document while petition is pending

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Regional Center Investment – over 630 USCIS approved regional centers
 - Characteristics:
 - If not interested in starting a business
 - If investor desires to take a more passive role (ideal for retirees)
 - If you want to start a business, but will not create sufficient employment for an individual EB-5
 - If you desire to be geographically mobile
 - If you desire to spend a significant amount of time outside of the U.S.
 - Immigration, rather than business, is your investment driving force
 - Requirements
 - Amount of Investment
 - Approved regional centers have been approved as “targeted employment area” investments, thus qualify for the reduced \$500,000 investment requirement
 - Job Creation
 - Indirect employment creation – generated in the community through the regional center investment

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Note: Must do research – some regional centers have a long history of success and some do not
 - Think ahead – chose a regional center with a successful record to enhance the likelihood that the investor will be able to remove condition after two years and become a permanent resident
 - Look at how the job creation is documented and calculated and the economic models of job creation methodology utilized for determining indirect job creation.
- Management
 - Regional Centers satisfy this requirement when they apply for approval
 - Regional centers are limited partnerships – if petitioner is a limited partner and the limited partnership agreement provides the petitioner with rights, power and duties normally granted to limited partners under the Uniform Limited Partnership Act, the investor will be considered sufficiently engaged in the management of the enterprise
- Source of Funds
 - The same as with individual investment – requires substantial documentation

Investment (EB-5) – Permanent Residence Status (*Cont'd.*)

- Source of Funds
 - The same as with individual investment – requires substantial documentation
- Timing
 - I-526 taking approximately 14 months
 - I-829 taking approximately 14 months
 - EB-5 quota category is current, which means can obtain employment authorization and travel document while petition is pending

How Obama's Executive Action will Impact Investors and Entrepreneurs

- “To enhance opportunities for **foreign investors**, researchers, and **founders of start-up enterprises** wishing to conduct research and development and create jobs in the United States, I hereby direct USCIS to implement...”
 - What
 - Extend eligibility for national interest waivers to investors and entrepreneurs
 - Authorize parole, on a case-by-case basis, to eligible investors, researchers and founders of start-up enterprises, who
 - have been awarded substantial U.S. investor financing; or
 - otherwise hold the promise of innovation and job creation through the development of new technologies or the pursuit of cutting-edge research
 - Extend the use of option practical training (OPT) for foreign students
 - Provide clear, consolidated guidance on the meaning of “specialized knowledge” to bring greater clarity and integrity to the L-1B program, improve consistency in adjudications, and enhance companies’ confidence in the program

How Obama's Executive Action will Impact Investors and Entrepreneurs *(Cont'd.)*

- When
 - Not clear when guidelines and regulations will be issued

How to plan ahead while in F-1 status and other things a start-up owner should consider

- Social Security Number – once you obtain work authorization so that you can start building your credit rating
- Credit Card – start building your credit
 - If American Express holder in foreign country – can apply to transfer funds to U.S.
 - Citibank and Bank of the West provide credit cards to nonimmigrants
- Employment Identification Number – social security number for your company

Questions?

Addendum 1 – Treaty Countries

Treaty Countries

Country	Classifications
Albania	E-2
Argentina	E-1
Argentina	E-2
Armenia	E-2
Australia	E-1
Australia	E-2
Austria	E-1
Austria	E-2
Azerbaijan	E-2
Bahrain	E-2
Bangladesh	E-2
Belgium	E-1
Belgium	E-2
Bolivia	E-1
Bolivia	E-2
Bosnia and Herzegovina	E-1
Bosnia and Herzegovina	E-2
Brunei	E-1
Bulgaria	E-2
Cameroon	E-2
Canada	E-1
Canada	E-2
Chile	E-1
Chile	E-2
China (Taiwan)	E-1
China (Taiwan)	E-2
Colombia	E-1
Colombia	E-2
Congo (Brazzaville)	E-2
Congo (Kinshasa)	E-2
Costa Rica	E-1
Costa Rica	E-2
Croatia	E-1

Country	Classifications
Croatia	E-2
Czech Republic	E-2
Denmark	E-1
Denmark	E-2
Ecuador	E-2
Egypt	E-2
Estonia	E-1
Estonia	E-2
Ethiopia	E-1
Ethiopia	E-2
Finland	E-1
Finland	E-2
France	E-1
France	E-2
Georgia	E-2
Germany	E-1
Germany	E-2
Greece	E-1
Grenada	E-2
Honduras	E-1
Honduras	E-2
Iran	E-1
Iran	E-2
Ireland	E-1
Ireland	E-2
Israel	E-1
Italy	E-1
Italy	E-2
Jamaica	E-2
Japan	E-1
Japan	E-2
Jordan	E-1
Jordan	E-2
Kazakhstan	E-2

Addendum 1 – Treaty Countries (Cont'd)

Country	Classifications
Korea (South)	E-1
Korea (South)	E-2
Kosovo	E-1
Kosovo	E-2
Kyrgyzstan	E-2
Latvia	E-1
Latvia	E-2
Liberia	E-1
Liberia	E-2
Lithuania	E-2
Luxembourg	E-1
Luxembourg	E-2
Macedonia, the Former Yugoslav Republic of (FRY)	E-1
Macedonia, the Former Yugoslav Republic of (FRY)	E-2
Mexico	E-1
Mexico	E-2
Moldova	E-2
Mongolia	E-2
Montenegro	E-1
Montenegro	E-2
Morocco	E-2
Netherlands	E-1
Netherlands	E-2
Norway	E-1
Norway	E-2
Oman	E-1
Oman	E-2
Pakistan	E-1
Pakistan	E-2
Panama	E-2
Paraguay	E-1
Paraguay	E-2
Philippines	E-1
Philippines	E-2

Country	Classifications
Poland	E-1
Poland	E-2
Romania	E-2
Serbia	E-1
Serbia	E-2
Senegal	E-2
Singapore	E-1
Singapore	E-2
Slovak Republic	E-2
Slovenia	E-1
Slovenia	E-2
Spain	E-1
Spain	E-2
Sri Lanka	E-2
Suriname	E-1
Suriname	E-2
Sweden	E-1
Sweden	E-2
Switzerland	E-1
Switzerland	E-2
Thailand	E-1
Thailand	E-2
Togo	E-1
Togo	E-2
Trinidad & Tobago	E-2
Tunisia	E-2
Turkey	E-1
Turkey	E-2
Ukraine	E-2
United Kingdom	E-1
United Kingdom	E-2
Yugoslavia	E-1
Yugoslavia	E-2