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ofac licenses a single commercial license to cuba. an individual is only allowed to conduct the exact type of transactions authorized by the license. the license contains provisions that require the individual to certify that he or she is not acting on behalf of any other person or entity, and that he or she is not engaging in prohibited transactions with cuba, including transactions with cuban nationals, cuban entities, and cuban-related entities. the license does not authorize any third-party transactions, such as for example, travel agency or tour operator transactions, third-party payments made on behalf of an individual, or any other third-party transactions. the commercial license covers all types of traveler, including individuals, corporations, and entities. the license does not authorize the travel of family members of the individual. yes, the u.s. government continues to view the irgc as a support organization for terrorism, as described in paragraph (c)(2) of the rule. however, the department of the treasury recently provided a clarification of the sanctions that apply in these circumstances. specifically, the department of the treasury states that the prohibition against certain transactions with an iran-related party also applies to the irgc, which is considered by the department of the treasury to be an "integral part of the irgc." the department of the treasury further states that it will not provide a "safe harbor" for transactions that would otherwise be prohibited under the sanctions against an iran-related party. a safe harbor is a certification that a transaction is not prohibited under the sanctions. for a description of the safe harbor, see the department of the treasury announcement, which clarifies that the prohibition under the iran-related party sanctions applies to the irgc. this applies to transactions that would otherwise be prohibited under the iranrelated party sanctions. transactions with an iran-related party that are deemed to be prohibited under the iran-related party sanctions do not constitute a safe harbor for a transaction with an entity that is an integral part of an iran-related party.

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