

December 6, 2019

The Honorable Wilbur L. Ross, Jr.  
Secretary  
U.S. Department of Commerce  
1401 Constitution Ave, NW  
Washington, DC 20230

Dear Secretary Ross:

The undersigned associations welcome the opportunity to provide comments in response to the proposed rule implementing the Executive order of May 15, 2019, entitled “Securing the Information and Communications Technology and Services Supply Chain.” We thank you for your efforts to engage with industry throughout this process.

As stated in the notice, “The information and communications technology and services (ICTS) supply chain is critical to nearly every aspect of U.S. national security... [and]... must be secure to protect our national security, including the economic strength that is an essential element of our national security”.

Given the importance of this objective, the complex dimensions of the proposed policy changes contained in the notice, and the technological complexities at issue, we request the Department extend the notice’s comment period to 90 days to ensure our associations and our members are able to provide the Department with a response that is both meaningful and comprehensive.

We look forward to working with you to ensure that the government receives the best input to guide this process.

Sincerely,

Association of Global Automakers  
Here For America  
BSA | The Software Alliance  
Business Roundtable  
Coalition of Services Industries  
Computer & Communications Industry Association  
CompTIA  
CTIA  
Information Technology Industry Council  
Internet Association  
IPC  
Motor & Equipment Manufacturers Association  
National Association of Manufacturers

National Electrical Manufacturers Association  
National Foreign Trade Council  
NCTA – The Internet & Television Association  
Organization for International Investment  
Satellite Industry Association  
Security Industry Association  
SEMI  
Semiconductor Industry Association  
TechNet  
Telecommunications Industry Association  
US-China Business Council  
U.S. Chamber of Commerce  
United States Council for International Business  
USTelecom - The Broadband Association

cc:

Cordell Hull, Acting Deputy Under Secretary, Bureau of Industry and Security  
Richard Ashooh, Assistant Secretary of Commerce for Export Administration, Bureau of  
Industry and Security  
Diane Rinaldo, Acting Assistant Secretary for Communications and Information, National  
Telecommunications and Information Administration