

December 12, 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,

American Chemistry Council
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
National Retail Federation
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