

June 27, 2019

Honorable Wilbur Ross
Secretary of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

Dear Mr. Secretary:

The undersigned associations write to you in anticipation of the Advance Notice of Proposed Rulemaking (ANPRM) regarding the review of controls for foundational technologies set forth in the Export Control Reform Act of 2018 (ECRA). We thank you for your efforts to fulfill the essential national security objectives behind the ECRA and your department's willingness to engage with industry throughout this process.

The development of industry input in response to the emerging technologies ANPRM provided a window into the complex dimensions of these proposed policy changes. We thank you for recognizing those challenges and graciously extending the timeframe for interested parties to respond. As we look to the next phase of this project, we request that the Bureau of Industry and Security (BIS) set the comment period for the foundational technologies ANPRM to 90 days to ensure our associations and our members have adequate time to review the notice and provide comprehensive feedback to address the policy concerns and technological complexities at issue.

We look forward to working with you and BIS to ensure that the government receives the best input it can from all available sources about foundational technologies as laid out in the ECRA.

Sincerely,

ACT | The App Association
Aerospace Industries Association
The Alliance of Automobile Manufacturers
American Investment Council
Association of Global Automakers
Biotechnology Innovation Organization (BIO)
BSA | The Software Alliance
Business Roundtable
Coalition of Services Industries (CSI)
Computing Technology Industry Association (CompTIA)
Consumer Technology Association
CTIA
The Cybersecurity Coalition
Information Technology Industry Council
Internet Association
Motor & Equipment Manufacturers Association

National Association of Manufacturers
National Venture Capital Association
National Foreign Trade Council
Organization for International Investment
Semiconductor Industry Association
Software and Information Industry Association
TechNet
Telecommunications Industry Association
United States Council for International Business
U.S. Chamber of Commerce
USTelecom—The Broadband Association

Cc: The Honorable Nazak Nikakhtar, Undersecretary of Commerce for Industry and Security
The Honorable Rich Ashooh, Assistant Secretary of Commerce for Export Administration