



MEMORANDUM

To: Regulatory Policy Division, Bureau of Industry and Security,
U.S. Department of Commerce

From: Association of American Universities
Contact: Tobin Smith, toby_smith@aaup.edu; (202) 408-7500

Association of Public and Land-grant Universities
Contact: Jennifer Poulakidas, JPoulakidas@apl.org; 202-478-6040

Association of American Medical Colleges
Contact: Steve Heinig, sheinig@aamc.org; (202) 828-0488

Council on Governmental Relations
Contact: Robert Hardy, rhardy@cogr.edu; (202) 289-6655

Date: December 4, 2018

Subject: Review of Controls for Certain Emerging Technologies ANPRM
RIN-0694-AH61

The Association of American Universities (AAU), Association of Public and Land-grant Universities (APLU), Council on Governmental Relations (COGR), and Association of American Medical Colleges (AAMC) which together represent most all major research universities and medical schools in the United States, welcome the opportunity to respond to the Advance Notice of Proposed Rulemaking (ANPRM) on the “Review of Controls for Certain Emerging Technologies published by the Bureau of Industry and Security (BIS) in the Federal Register on November 19, 2018.

As has already been well stated by the Association of University Export Control Officers (AUECO) in a recent response they provided to the BIS, a 30-day comment period will unduly constrain the public’s and our universities’ ability to provide meaningful input on this very complex and technical, but very important topic. The Dec. 19, 2018 deadline for the ANPRM is especially problematic for institutions of higher education given the end-of-year operational issues with which they are currently dealing.

New regulations of emerging technologies may heavily impact our institutions. Full and robust input from experts at our campuses would greatly benefit this process, as contemplated by Congress in the Export Controls Reform Act. We join AUECO in recommending an extension of the comment period to at least 60 days and preferably to 90 days. This will help assure the meaningful involvement of those with the necessary expertise at the institutions represented by our associations.