



November 15, 2023

The Honorable Alan F. Estevez  
Undersecretary of Commerce for Industry and Security  
U.S. Department of Commerce  
1401 Constitution Avenue N.W.  
Washington, DC 20002

Dear Under Secretary Estevez,

The National Foreign Trade Council (“NFTC”) notes the Bureau of Industry and Security’s (“BIS”) recent publication of two Interim Final Rules (“IFR”), issued October 17, 2023, on Additional Export Controls on Advanced Computing Items, Supercomputer, and Semiconductor End-Use (“AC/S”) and Semiconductor Manufacturing Equipment and Related Equipment to China (“SME”). We respectfully ask that BIS extend this comment period from December 18, 2023 (60 days), to January 17, 2024 (days).

#### Request for extension of public comment period


As you know, these IFRs update, clarify and expand the October 7, 2022 rule Implementation of Additional Export Controls: Certain Advanced Computing and Semiconductor Manufacturing Items; Supercomputer and Semiconductor End-Use; Entity List Modification (“October 22 rule”, “semiconductor rule”). BIS extended the public comment period for this October 22 rule from 60 days to 90 days, allowing stakeholders including industry to provide more thorough and detailed analysis and comments on the rule. We respectfully seek the same extension for the AC/S and SME IFRs and look forward to provide a robust response.

#### About NFTC

The NFTC, organized in 1914, is an association of U.S. business enterprises engaged in all aspects of international trade and investment. Our membership covers the full spectrum of industrial, commercial, financial, and service activities. Our goal is to always protect national security and economic security interests, and strengthen U.S. industries. Robust trade relationships are central to economic and national security. NFTC’s National Security Policy Initiative brings the voice of business to policy makers on global security issues affecting international trade.

Thank you for your consideration of this request and for your continued engagement with industry. We welcome the opportunity to discuss this important matter and to answer any questions that you may have. I can be reached at (202) 887-0278 or via email to [jchu@nftc.org](mailto:jchu@nftc.org).

Sincerely,



Jeannette L. Chu

Vice President for National Security Policy

**National Foreign Trade Council**

1225 New York Avenue, Suite 650B, Washington DC 20005

***Serving America's Global Businesses Since 1914.***

[www.nftc.org](http://www.nftc.org)