March 20, 2020

The Honorable Ellen M. Lord  
Office of the Under Secretary of Defense for Acquisition and Sustainment  
United States Department of Defense  
3010 Defense Pentagon  
Room 3E1010  
Washington, DC 20301

Subject: COVID-19 Shelter-in-place

Dear Under Secretary Lord:

As our nation confronts COVID-19, we thank you for the necessary and dramatic actions you are taking to protect the people living in the United States.

Shelter-in-place orders are being considered across the country—and in some cases have already been implemented—for all but essential workers and organizations. States and local jurisdictions that implemented such orders have overlooked the important role of electronics manufacturers in combating the pandemic. As the Federal Government considers imposing restrictions on businesses, we implore you to explicitly exempt electronics manufacturers that serve healthcare, defense, infrastructure and government communities and also to consider a broader industry exemption to ensure that electronics manufacturers are positioned to help meet the country’s urgent needs, maintain critical infrastructure, and support defense readiness.

Please know that electronics manufactures are on the front lines with you in the nation’s fight against the spread of COVID-19 and the treatment of infected patients. Electronics manufacturers are building essential products for both medical and critical infrastructure. We provide the electronic components that go in ventilators, respirators, heart and blood pressure monitors as well as components that go in generators, power distribution systems, and maintenance of the electrical and telecommunications grid. Even as the industry ramps up its support for the medical industry, it is still needed to maintain national security and critical infrastructure, including the telecommunications network.

The electronics systems and components that are manufactured in the United States disproportionately serve the medical, defense, critical infrastructure and government communities. It is imperative that manufacturers of such electronics remain in operation. Avoiding the confusion that has plagued manufacturers in some jurisdictions by clearly exempting medical, defense, infrastructure and government-related manufacturing from shelter-in-place orders would allow the needed work to proceed.

To this end, the AS9100 certification is an internationally recognized standard that was established to satisfy DoD, NASA and FAA quality requirements. The AS9100 certification is a good indicator of whether...
a manufacturer is part of the U.S. defense supply chain. Likewise, the ISO13485 certification is an internationally recognized standard that sets requirements for quality management systems specific to the medical devices industry. The ISO13485 certification is a good indicator that a manufacturer serves the medical industry. While these two certifications do not represent the totality of manufacturers that serve the government and medical markets, referencing them in shelter-in-place orders and the FAQs that accompany those orders may help clarify the kind of manufacturing that is exempted from restrictions.

Moreover, we also encourage you to consider broader exemptions when placing operational restrictions on businesses. It is nearly impossible to disentangle manufacturing for these specific sectors from electronics manufacturing as a whole. Companies generally manufacture for many different customers across many industries. As single actors in complex, multi-layered supply chains, manufacturers do not always know the end customer or the products in which their electronics are integrated. Diversifying their production across many different industry segments is what keeps these companies solvent in a thin-margin, globally competitive marketplace. Allowing them to remain in operation, while implementing practices that provide distancing and exposure prevention, would keep them focused on meeting the current needs of the nation and world.

U.S. manufacturers of medical and defense electronics often rely on suppliers throughout the United States for vital components and inputs. Because of this, shuttering even a single part of the supply chain for a period will inhibit other companies from manufacturing, which could lead to significant delays in manufacturing the products our country needs to effectively treat victims and protect the nation.

We understand and agree that the health and safety of the country is of primary importance. To that end, I urge you to make all appropriate exemptions for electronics manufacturing as you consider shelter-in-place orders. Without such exemptions, our nation’s health care, infrastructure, and national security will suffer.

Please do not hesitate to contact me if IPC and the electronics industry can be a resource to you during this challenging time.

Respectfully,

John W. Mitchell  
President & CEO