April 7, 2020

The Honorable Wilbur L. Ross, Jr.
Secretary, U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, DC 20230

Dear Secretary Ross:

On behalf of IPC and its membership, I am writing to request that any changes to U.S. export controls that apply to printed circuit boards (PCB), printed circuit board assemblies (PCBAs), and electronic components be made through a proposed rule allowing for public comment before becoming effective. This type of transparency and opportunity for public comment is critical to ensure that any rule is appropriately designed to achieve the U.S. government’s national security objectives without imposing unintended adverse consequences on the U.S. electronics manufacturing industry.

IPC is a global trade association headquartered in the United States, representing all facets of the electronics manufacturing industry, including designers, printed circuit board manufacturers, assembly companies, suppliers, and original equipment manufacturers. We are the definitive authority on industry standards and the leading source for training, industry intelligence, public policy advocacy, and other programs to meet the needs of an estimated $2 trillion global electronics industry.

More than 80 percent of IPC’s global membership, representing over 5,900 company locations, are small to medium-sized businesses. Over 2,500 of IPC’s members are located in the United States and the heart of the electronics manufacturing supply chain.

Abrupt changes to the export controls regulations for PCBs, PCBAs, and electronic components will create uncertainty for the entire electronics ecosystem. The electronics manufacturing industry is the critical enabler of many other industries that rely on PCBs, PCBAs, and electronic components for defense electronics, automobiles, cell phones, medical devices and equipment, and many other technology products. Without PCBs, PCBAs, and electronic components, modern day advanced electronics and technology would not exist.

Not only are PCBs, PCBAs, and electronic components critical to many different industries, they are also vital to ending the COVID-19 pandemic. PCBs, PCBAs, and electronics components are the core of advanced medical equipment used by health professionals to treat the public. Electronics manufacturers are building essential products for both medical and critical infrastructure. They 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. The electronics manufacturing industry will also drive the industries of the future and the economic recovery once the COVID-19 public health emergency is over.

Changes to the export controls regulations that are under consideration have the potential to result in significant impacts to the electronics manufacturing industry and its global supply chain. Given the importance of the electronics manufacturing industry and the unprecedented public health crisis and
economic disruption, it is imperative that any regulatory changes be narrowly tailored and minimize damage to electronics manufacturers. Subjecting such regulatory changes to public comment would help ensure that Commerce benefits from the industry’s views and avoids unintentionally exacerbating an already difficult economic situation.

Thank you for your attention to ensuring a transparent, deliberative process for export controls changes impacting the electronics manufacturing industry.

Sincerely,

Chris Mitchell
Vice President, Global Government Relations

cc: Russ Vought, Acting Director, Office of Management and Budget