



John Engler

President and CEO

March 8, 2010

The Honorable Gary Locke
Secretary of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Dear Mr.  Secretary:

I applaud your commitment to export control modernization and look forward to working with you as the President's initiative moves forward. Your role is vital to both obtaining tighter security and to unfettering exports that have been needlessly constrained. The National Association of Manufacturers (NAM) supports your proposals announced last October and looks forward to working with you to further develop and implement those initiatives. In this context I am writing to raise an issue of great importance to the NAM – the Intra Company Transfer (ICT) license exception.

As you know, export control modernization is a priority for NAM members and, in particular, implementation of a revised ICT. A revised ICT could positively impact research and development (R&D), improve national security, build higher walls around truly sensitive technologies, and allow NAM members to collaborate with their colleagues and trusted business entities abroad. It is a practical and worthy reform that could provide immediate relief to government and industry alike. I cannot stress enough the importance of the ICT to U.S. manufacturers and national innovation.

NAM members believe the ICT will provide significant benefits, and much work has already been done to revise the proposed rule. Therefore, I ask you to prioritize finalizing the ICT in the near-term. Its completion would create needed momentum to sustain broader modernization of the export control system. I am available to discuss the NAM's comments on changes to the proposed ICT and am hopeful a revised ICT can be issued as a final rule in the near future.

Sincerely,


John Engler

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