

The Coalition for Security and Competitiveness

Aerospace Industries Association
American Association of Exporters and Importers
The American League for Exports and Security Assistance
AMT—The Association for Manufacturing Technology
Business Roundtable
Coalition for Employment through Exports
General Aviation Manufacturing Association
Industrial Fasteners Institute
Information Technology Industry Council
National Association of Manufacturers
National Defense Industrial Association
National Foreign Trade Council
Satellite Industry Association
Space Enterprise Council
Space Foundation
TechAmerica
U.S. Chamber of Commerce

October 2, 2009

General James Jones
National Security Advisor
The White House
1600 Pennsylvania Ave. N.W.
Washington, DC 20500

The Honorable Lawrence Summers
Director, National Economic Council
The White House
1600 Pennsylvania Ave. N.W.
Washington, DC 20500

Dear General Jones and Dr. Summers,

The Coalition for Security and Competitiveness (CSC) applauds President Obama's decision to undertake a thorough review of the U.S. export control system and we look forward to working with the Administration on this critical issue.

The Coalition, comprised of leading high-technology associations representing a broad cross-section of U.S. industry, was formed in 2007 to develop recommendations for improving the U.S. export control regime. We believe changes must be made to the current system to make sure it is aligned with our current security needs and the realities of the global technological environment, and – as a practical matter - operates in a more predictable, transparent, and efficient manner.

The Coalition has developed the enclosed set of principles and objectives, which we believe would shape an effective technology control regime for the 21st century that protects critical technologies and safeguards our national security. The Coalition would welcome an opportunity to brief the NSC/NEC interagency team to provide detailed recommendations that build upon these principles.

We look forward to working with you and your respective teams as the review gets underway, and appreciate the opportunity to provide the Coalition's perspective on this critical issue.

Sincerely,

The Coalition for Security and Competitiveness

Enclosure:
Proposed Principles and Implementation Objectives

cc: The Honorable Hillary R. Clinton, Secretary of State
The Honorable Robert Gates, Secretary of Defense
The Honorable Gary Locke, Secretary of Commerce

Proposed Principles and Implementation Objectives for U.S. Export Control Policy

Principles

A modernized technology control regime must –

- Prevent proliferation of, and access to, our most sensitive and militarily critical technologies by current and potential adversaries
- Promote defense cooperation, foreign sales, and interoperability with U.S. partners and allies, consistent with U.S. foreign policy and national security objectives
- Support U.S. technological and scientific leadership, while leveraging the benefits of foreign technological innovation
- Strengthen U.S. competitiveness in global technology markets and preserve a cutting-edge industrial base, including a highly-skilled workforce

Implementation Objectives

- Develop clear policy criteria and an effective decision-making process for identifying truly critical technologies whose protection is essential to U.S. national security.
- Minimize U.S. controls on items readily available in the global marketplace to ensure limited government and corporate export control resources are applied to the most sensitive items.
- Rationalize the export licensing system to reduce costs and administrative processing times by ensuring clear lines of agency jurisdiction, increasing cooperation among relevant agencies, and promoting more responsive and efficient management of controlled exports.
- Institute new licensing protocols to facilitate the transfer of controlled technologies and items within companies and their foreign subsidiaries and offices so long as the companies maintain appropriate standards of internal control and compliance.
- Strengthen U.S. security and enhance interoperability by implementing more efficient approaches to licensing for defense and national security programs important to the U.S. government in which success hinges on timely technology sharing with our closest allies and partners.
- Increase transparency in rules and regulations and set reasonable enforcement standards and practices while increasing cooperation and dialogue with industry to help companies achieve best-in-class compliance programs.
- Promote a more effective system of multilateral controls by seeking greater harmonization of export controls among major trading partners and minimizing unilateral controls.