

# UC Office of the President

## U.S. Department of Commerce

### Title

UC Comments in Response to 2024-16496 (89 FR 60985) & 2024-22146 (89 FR 78835), End-Use and End-User Based Export Controls, Including U.S. Persons Activities Controls: Military and Intelligence End Use and End Users (July 29, 2024), RIN 0694-AJ43

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OFFICE OF THE VICE PRESIDENT — RESEARCH & INNOVATION

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October 15, 2024

Hillary Hess  
Director, Regulatory Policy Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
Submitted via [regulations.gov](https://www.regulations.gov)

**RE: UC Comments in Response to [2024-16496 \(89 FR 60985\)](#) & [2024-22146 \(89 FR 78835\)](#),  
End-Use and End-User Based Export Controls, Including U.S. Persons Activities Controls:  
Military and Intelligence End Use and End Users (July 29, 2024), RIN 0694-AJ43**

Dear Director Hess:

I write on behalf of the University of California (UC) system – comprised of ten campuses, six academic health centers, and three affiliated U.S. Department of Energy national laboratories – regarding the Bureau of Industry and Security (BIS)’s proposed amendments to the Export Administration Regulations originally issued on July 29, 2024.

UC appreciates and supports BIS’s efforts to advance U.S. national security and foreign policy interests while minimizing potential impacts to key stakeholders. The proposed amendments, including additional exclusions from applicability of licensing requirements and other elements of BIS control, demonstrate a careful consideration of both security imperatives and the exemptions necessary for academic research and collaboration.

We encourage the government’s consideration of recommendations submitted by the Association of University Export Control Officers (AUECO) and Council on Government Relations (COGR). In particular, we support their request for additional exclusions for routine academic activities and clarity on definitions concerning Military-Support End Users and Intelligence End Users. We believe these revisions would better minimize unnecessary impacts on international research and other vital academic collaborations, while continuing to safeguard critical technologies.

Thank you for the opportunity to comment. We look forward to continued engagement on this important issue. If you have any questions concerning these comments, please contact Andy Perkins, Policy Resource Coordinator/Research Policy Manager, at [Andy.Perkins@ucop.edu](mailto:Andy.Perkins@ucop.edu).

October 15, 2024

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Sincerely,

A handwritten signature in black ink, reading "Lourdes G. DeMattos". The signature is fluid and cursive, with the first name "Lourdes" being larger and more prominent than the last name "DeMattos".

Lourdes G. DeMattos

Director, Research Policy Analysis & Coordination

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