

UC Office of the President

U.S. Department of Commerce

Title

UC Comments in Response to 2024-16498 (89 FR 60998) & 2024-22145 (89 FR 78836), Export Administration Regulations: Crime Controls and Expansion/Update of U.S. Persons Controls (July 29, 2024), RIN 0694-AI35

Permalink

<https://escholarship.org/uc/item/2vf29083>

Journal

N/A

Author

UC Office of the President

Publication Date

2024-10-15



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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 [2024-16498 \(89 FR 60998\)](#) & [2024-22145 \(89 FR 78836\)](#),
Export Administration Regulations: Crime Controls and Expansion/Update of U.S.
Persons Controls (July 29, 2024), RIN 0694-AI35**

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 provide clearer export regulations that safeguard against risks to individuals’ privacy due to unjustified government use of facial recognition and other mass surveillance technologies.

We encourage the government’s consideration of recommendations submitted by the Association of University Export Control Officers (AUECO) and Council on Government Relations (COGR). We believe clarifications of the Foreign-Security End User provisions as well as a more specific definition of facial recognition systems would help both regulators and the regulated community identify end users and uses of greatest concern while more clearly excluding low-risk organizations and activities.

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.

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Persons Controls, RIN 0694-AI35
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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
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