July 8, 2013

Mr. Timothy Mooney
Regulatory Policy Division
Room 2099B
Bureau of Industry and Security
U.S. Department of Commerce
14th Street & Pennsylvania Ave., N.W.
Washington, D.C. 20230

Mr. Kerem Bilge
Acting Director
Office of Defense Trade Controls Policy
U.S. Department of State
2401 E Street, N.W.
Washington, D.C. 20037

Re: **RIN 0694-AF87:** Control of Spacecraft Systems and Related Items The President Determines No Longer Warrant Control Under the United States Munitions List (USML) (*Federal Register* Notice of May 24, 2013); and

RIN 1400-AD33: Revision of U.S. Munitions List Category XV and Definition of Defense Services (*Federal Register* Notice of May 24, 2013)

Dear Mr. Mooney and Mr. Bilge:

Intel Corporation appreciates the opportunity to provide comments on the above-referenced Notices of Proposed Rulemaking (NPRMs). Our company designs and manufactures high-volume integrated digital technology platforms that are used worldwide in a wide variety of commercial applications spanning such products as PCs, laptops, servers, tablets, smartphones, automobiles, automated factory systems, and medical devices.

Consistent with the comments of the Semiconductor Industry Association (SIA) on the proposed rulemakings, Intel strongly supports proposed regulatory changes within the NPRMS that:

- Replace USML Category XV(d) with the proposed ECCN 9A515.d in the CCL "500 series."
- Articulate the scope of the proposed ECCN 9A515.d with header language reading "Microelectronic circuits rated, certified, or otherwise specified or described as meeting

> or exceeding all the following characteristics and that are "specially designed" for defense articles, "600 series" items, or items controlled by 9A515."

SIA's urgent recommendation to waive the 180-day transition rule for implementing the proposed changes for USML XV(d) and ECCN 9A515.d is also vigorously endorsed by Intel. It is unnecessary to delay implementation by six months for these particular changes, given our belief that they will not affect current industry products.

In sum, the proposed changes in this area clearly reflect diligent efforts by the administration to protect its national security interests while creating a more effective and practical regulation. The changes reflect extensive efforts by officials from DOD and other U.S. agencies, national labs, and industry technical experts. We hope the changes can be formally implemented when the rulemakings are finalized and published as opposed to prolonging the effective date for another 6 months.

Thank you for the opportunity to provide our views on this vital matter.

Sincerely,

David Rose
Senior Director, Export/Import Policy
Intel Corporation