



*The*  
***University of Mississippi***

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Chief, Regulatory Products Division  
Clearance Office  
U. S. Citizenship and Immigration Services  
U. S. Department of Homeland Security  
111 Massachusetts Avenue, NW, Suite 3008  
Washington, DC 20529-2210

Via e-mail: rfs.regs@dhs.gov

Re: OMB Control Number 1615-0009 (Proposed Revision of I-129)

Dear Sir or Madam:

I represent the University of Mississippi and I am writing to comment on the proposed revision of Form I-129. This revision adds a section concerning whether the H-1B applicant is going to come in contact with technology requiring an export control license. The University objects to this addition for a number of reasons.

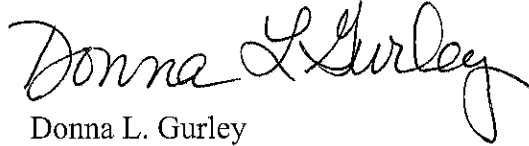
First, the change will place an unnecessary burden on both the individuals processing the I-129s and those who analyze our export control issues. This process would make sense if the majority of individuals who apply for H-1B status actually needed a deemed export license; however, the opposite is true: in the University of Mississippi's history, we have had to seek licenses for only two of the hundreds of H-1B holders during that time. Under the revised form, we would need the input from both departments every time an I-129 is submitted.

Even if the department hiring the H-1B applicant believes that an export control license may be needed, it may be impossible to know the full range of technology with which the individual will come in contact during the time they are at the university. Currently, a change in technology may require a new application for an export control license. Under the proposed revision, it appears that a new I-129 would also have to be filed. The result may hinder progress on the federally funded research where the

researcher will very likely be one of the key personnel. For a small research team, this could potentially bring a study to a standstill and waste taxpayer money.

Finally, it seems counterintuitive for this information to be collected by an agency that has no rule-making or enforcement authority over export control. It is difficult to imagine how adding this additional burden to the H-1B process will improve national security, and it is likely to have a negative impact on federally funded research.

Very truly yours,

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

Donna L. Gurley  
Associate University Attorney

DLG:vrr