

January 3, 2024

The Honorable Gina Raimondo Secretary of Commerce Washington, DC 20230

## OFFICERS

Sudip S. Parikh, PhD, Chair Georges C. Benjamin, MD, Vice Chair Mary Woolley, President E. Albert Reece, MD, PhD, MBA, Secretary Amy Comstock Rick, JD, Treasurer

## BOARD MEMBERS

Nancy Brown Deborah Deas, MD, MPH The Hon. Charlie Dent Mikael Dolsten, MD, PhD Victor J. Dzau, MD Kafui Dzirasa, MD, PhD Ayman El-Mohandes, MBBCh, MD, MPH Arthur C. Evans Jr., PhD Darío Gil. PhD The Hon. Bart Gordon Mary J.C. Hendrix, PhD The Hon, Rush D, Holt, PhD Karen E. Knudsen, MBA, PhD Mark McClellan, MD, PhD Michelle McMurry-Heath, MD, PhD Jessica L. Mega, MD, MPH Herbert Pardes, MD Harold L. Paz. MD. MS Mary Pittman, DrPH Guillermo Prado, PhD Derek Rapp David Reese, MD Lewis G. Sandy, MD, FACP The Hon. Donna Shalala, PhD Deborah Trautman, PhD, RN, FAAN M. Roy Wilson, MD Keith R. Yamamoto, PhD Cynthia Zagieboylo Elias Zerhouni, MD

CHAIR EMERITI The Hon. Michael N. Castle Susan Dentzer

241 18<sup>th</sup> Street South Suite 501 Arlington, VA 22202

P 703-739-2577

**F** 703-739-2372

E info@researchamerica.org

The Honorable Laurie E. Locascio Under Secretary of Commerce for Standards and Technology Washington, DC 20230

## Re: Docket No.: 230831–0207-Request for Information Regarding the Draft Interagency Guidance Framework for Considering the Exercise of March-In Rights

Dear Secretary Raimondo and Undersecretary Locascio:

On behalf of Research!America, thank you for your respective contributions to the health, security, and prosperity of individuals in the U.S. and across the globe. Research!America is a nonprofit, nonpartisan alliance that brings together organizations from the patient and philanthropic communities, academia, and industry. Together we advocate for science, discovery, and innovation to achieve better health for all.

My purpose in writing is to request a 90-day extension of the comment period for the draft interagency guidance framework for considering the exercise of March-In Rights. We believe this extension is needed to afford affected parties -- spanning patients, researchers and research institutions, representatives from across the broad swath of our economy impacted by technology transfer, and the American public at large -sufficient time to engage with the Department about the framework.

Thank you, Secretary Raimondo and Undersecretary Locascio, for considering this request, and please call on Research!America if we can be of assistance going forward.

Sincerely,

Marybolley

Mary Woolley President and CEO