



January 3, 2023

The Honorable Gina Raimondo  
Secretary of Commerce  
Washington, DC 20230

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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,

Mary Woolley  
President and CEO