



September 22, 2026

The Honorable Jeffrey I. Kessler
Under Secretary of Commerce for Industry and Security
Bureau of Industry and Security
U.S. Department of Commerce
14th Street and Pennsylvania Avenue, NW
Washington, DC 20230

RE: Export License Application Review Timelines and BIS Staffing Capacity

Dear Under Secretary Kessler:

On behalf of the American Association of Exporters and Importers ("AAEI"), we respectfully write to you in your capacity as Under Secretary of Commerce for Industry and Security to seek information regarding the Bureau of Industry and Security's (BIS) current and projected staffing levels for the review and acceptance of export license applications. We raise this matter because license review timelines appear to have lengthened considerably, and we are concerned that staffing capacity may be contributing.

Background and basis for concern. Since your confirmation in March 2025, the export-control community has watched BIS navigate a demanding transition, including a "hold without action" directive on pending applications, multiple policy-driven pauses, and the SNAP-R platform migration that required all users to re-register by June 30, 2025. During your confirmation proceedings, you acknowledged the importance of staffing, noting your aim to ensure the agency has sufficient personnel to carry out enforcement of trade regulations worldwide.

Under 15 C.F.R. § 750.4, BIS is required to reach a decision on a license application or refer it to the President within 90 calendar days of registration. That regulatory standard has not changed. However, exporters have reported real-world processing times of 120 to 180 days or more through much of 2025, with certain China-related filings exceeding six months. As an agency of approximately 450 personnel responsible for an expanding and increasingly complex export-control mission, BIS's capacity to meet its statutory deadline is central to the predictability that U.S. industry relies on.

Questions for your consideration. We would appreciate the Bureau's response to the following:

1. **Current staffing for license review.** How many full-time equivalent (FTE) positions are presently allocated to export license application review and adjudication across the relevant licensing offices? How does this compare to the staffing levels as of January 2025?
2. **Hiring and recruitment.** What is BIS's current hiring plan for licensing officers and the technical staff who support commodities, technology, and end-use analysis? Are there unfilled positions, and what is the timeline for filling them?
3. **Throughput and backlog.** What is the current average and median processing time for license applications, disaggregated by destination country group and control list? How many applications are presently pending beyond the 90-day statutory window, and what is BIS's plan for clearing that backlog?
4. **Process and policy drivers.** To what extent does BIS attribute current delays to staffing constraints as opposed to policy directives, interagency referral (e.g., State, Defense, Energy), or the transition to updated licensing systems? Has BIS identified specific bottlenecks in its review workflow?
5. **Forward outlook.** Does BIS anticipate that review timelines will return to the 90-day statutory standard within a defined timeframe? What staffing and resource investments would be required to sustain compliance with 15 C.F.R. § 750.4 on a durable basis?
6. **Stakeholder engagement.** Would BIS consider providing periodic public reporting on license processing times and pending application volumes, so that the trade community can plan and allocate resources accordingly?

We recognize the national-security importance of the Bureau's mission and the care that thorough review requires. Our purpose is not to press for less rigorous scrutiny, but to seek clarity on the resourcing and planning that allow BIS to fulfill both its security mandate and its service commitment to U.S. exporters under the governing regulation.



We would welcome the opportunity to discuss these matters further, whether by written response, a meeting with your staff, or participation in any industry outreach BIS may convene. Thank you for your attention and for your service.

Respectfully,

A handwritten signature in blue ink, appearing to read "Eugene Laney, Jr.", is written over a faint, light blue rectangular background.

Eugene Laney, Jr.

President and CEO

American Association of Exporters and Importers



+1 202-857-8009



1300 Pennsylvania Avenue NW Suite 450 Washington D.C. 20004



www.aei.org