



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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January 18, 2018

The Honorable Lee Francis Cissna
Director
U.S. Citizenship and Immigration Services
20 Massachusetts Avenue, NW
Washington, D.C. 20529

Re: *International Entrepreneur Rule*

Dear Director Cissna:

TechNet is the national, bipartisan network of innovation economy CEOs and senior executives. Our diverse membership includes dynamic startups and the most iconic companies on the planet and represents three million employees and countless customers in the fields of information technology, e-commerce, the sharing and gig economies, advanced energy, cybersecurity, venture capital, and finance.

On behalf of our 77 member companies, I write to [reiterate](#) our support for the *International Entrepreneur Rule* and urge the administration to preserve it as an important driver of investment, economic growth, and job creation in the United States.

As you know, the *International Entrepreneur Rule* is a Department of Homeland Security (DHS) regulation designed to encourage high-impact entrepreneurs to stay in the U.S. for a limited period of time to grow their companies if they meet certain merit-based standards. The rule was set to go into effect on July 17, 2017, but DHS delayed its effective date to March 14, 2018, and issued a proposal to rescind the rule altogether. Last month, a federal judge ruled that this delay was unlawful and ordered its immediate implementation. According to the [Office of Management and Budget](#), a policy to officially rescind of the *International Entrepreneur Rule* has been “pending review” since November 17, 2017.

The *International Entrepreneur Rule* is in line with one of America’s longstanding keys to economic success — the welcoming of immigrant entrepreneurs and innovators to this country and allowing their talents to benefit our economy and workers. [One recent study](#) showed that immigrant entrepreneurs “have started more than half (44 of 87) of America’s startup companies that are valued at \$1 billion or more.” Immigrant founders have created an average of approximately [760 jobs per company](#) in the United States. Immigrants and their children have

started more than 40 percent of Fortune 500 companies, employing more than 10 million people. Those are jobs fueled by a diversity of talent that creates more employment opportunities for Americans here on U.S. soil. Rescinding the *International Entrepreneur Rule* would be a step backward for America's economy, as [one study](#) estimates that the *International Entrepreneur Rule* could create between 135,240 and 308,460 jobs over ten years.

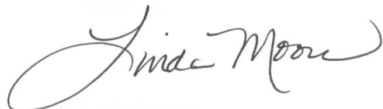
At TechNet, we represent many iconic American companies that have been founded or led by immigrants or their children. All of our companies have benefitted by having high-skilled immigrants innovating alongside native-born Americans to create life-changing technologies, millions of jobs, and trillions of dollars worth of economic activity.

Our nation should continue encouraging entrepreneurs from around the world to start companies and grow jobs in the United States. As part of achieving this goal, the administration should allow the *International Entrepreneur Rule* to take full effect this year and work with Congress and the business community on other ways to modernize our nation's legal immigration system to ensure the U.S. remains at the forefront of the innovation economy and that American workers have every opportunity to contribute and share in this prosperity.

In addition to the *International Entrepreneur Rule*, we understand the Trump Administration is reevaluating the future of other immigration policies, including the H-4 visa program for spouses of high-skilled workers, the H-1B visa program, the STEM OPT extension, and the termination of the Deferred Action for Childhood Arrivals (DACA) program on March 5, among others. We are concerned that disruptions to these programs could create a perfect storm of economic uncertainty that leads to the loss of talented workers, even more unfilled jobs across the tech sector, stifled innovation, missed investment opportunities, and significant economic costs. We stand ready to work with you to ensure future changes to our nation's immigration policies result in positive outcomes for the U.S. economy and American workers.

Thank you for your consideration.

Sincerely,



Linda Moore
President & CEO

CC: The Honorable Kirstjen M. Nielsen, Secretary, Department of Homeland Security
The Honorable Elaine C. Duke, Deputy Secretary, Department of Homeland Security



U.S. Citizenship
and Immigration
Services

April 6, 2018

Ms. Linda Moore
President & CEO TECHNET
805 15th Street, NW, Suite 708
Washington, DC 20005

Dear Ms. Moore:

Thank you for your January 18, 2018 letter regarding the International Entrepreneur Rule. As you mention in your letter, USCIS is finalizing a proposed rule to rescind the International Entrepreneur Parole Program. The rule will be open to public comment regarding the proposed rescission, and you may submit your comments during the open comment period. After the comment period has closed, USCIS will consider all submitted comments before publishing a final rule.

Thank you again for your letter and interest in this important issue.

Sincerely,

A handwritten signature in blue ink, appearing to read "LFC", written over a horizontal line.

L. Francis Cissna
Director