

October 23, 2020

The Honorable Chad F. Wolf
Acting Secretary of Homeland Security
Washington, DC 20528

RE: Docket ID: ICEB-2019-0006

Establishing a Fixed Time Period of Admission and an Extension of Stay Procedure for Nonimmigrant Academic Students, Exchange Visitors, and Representatives of Foreign Information Media

Dear Acting Secretary Wolf,

As the leaders of The Minerals, Metals & Materials Society (TMS), a nonprofit association that represents more than 14,000 materials scientists and engineers from the United States and around the world, we are writing to express our deep concerns about proposed changes to the international student visa program (DHS Docket No. ICEB-2019-0006) and to ask that the proposed changes to this critical program be significantly revised, or withdrawn.

TMS membership is composed of mostly Ph.D.s, who work to support the national defense of our country, to make American manufacturing more efficient and profitable, to add innovation to the consumer and business products that drive our marketplace and economy, and to educate young people in the pursuit of vital careers in science, technology, engineering and mathematics (STEM). We hold several major technical conferences annually nationwide, and the lessons learned and applied from these conferences contribute to countless billions in GDP for the nation.

Science and technology continue to drive our nation's economic growth, and many of the fastest growing jobs in the country require training in science, technology, engineering and mathematics. To meet these needs, America's leading researchers recruit the best global talent to this country. The proposed international student visa time limits would severely limit the ability of our country to maintain technical leadership. The proposed time limit of two or four years, depending on country of origin, is far too strict for graduate study in STEM disciplines, particularly in the case of Ph.D. study, which typically requires **five years** to complete. For students beginning with Masters-level study and then continuing on to a Ph.D., the typical time to completion of graduate study is **six years**. To require the extension or renewal of a visa in the midst of these highly demanding programs is to inject unnecessary uncertainty and risk into coming to America for advanced study in STEM. The likely end result is that many international students, particularly the most talented and sought-after, will choose to study elsewhere - to the benefit of other nations.

The proposed changes will harm not only the 40% of TMS members hailing from universities, but also federally funded research in advanced manufacturing, renewable energy, and other sectors critical to our national defense. These visa restrictions will slow American innovation at a time when scientists and engineers are being called to address unprecedented technological challenges.

October 23, 2020

Page 2

In conclusion, we ask that you work with your colleagues to protect America's position as the world's premier nation for technology and scientific advancement by (a) withdrawing the proposed changes to the international student visa program (DHS Docket No. ICEB-2019-0006), or (b) extending the proposed time limit for all countries of origin to a common limit of no less than six years. Leveraging an international pool of talent has helped make America the global leader it is today. Please do all you can to ensure that our nation's scientists have the tools they need to answer America's challenges of tomorrow.

Most respectfully,



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cc: Chairman Lindsey Graham
Chairman Jerry Nadler
Ranking Member Dianne Feinstein
Ranking Member Jim Jordan