



U.S. Department of Commerce Proposes ICTS Changes for Connected Software Applications

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Akin Gump published a client alert on December 1, 2022, which discuss that on November 26, 2021, the U.S. Department of Commerce (“Commerce”) issued a proposed rule, “Securing the Information and Communications Technology and Services Supply Chain; Connected Software Applications” (the “Proposed Rule”), to amend the Information and Communications Technology and Services (ICTS) Supply Chain regulations (15 C.F.R. Part 7) that became effective on March 22, 2021. Those regulations implement Executive Order 13873: Securing the Information and Communications Technology and Services Supply Chain (“ICTS Supply Chain EO”) issued by former President Trump on May 15, 2019 to address the national emergency posed by the ability of “foreign adversaries” to create and exploit vulnerabilities in the ICTS supply chain. Generally speaking, the ICTS Supply Chain regulations provide a broad framework for the Secretary of Commerce to identify, mitigate, prohibit or unwind covered “ICTS Transactions” involving “foreign adversaries” that pose an undue or unacceptable risk to U.S. national security.

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