

ECIA Statement to CISA on the “Essential Critical Infrastructure Workforce”

The Electronic Components Industry Association (ECIA) is an industry trade association whose members are manufacturers and distributors of electronic components. ECIA requests CISA to include electronic component manufacturers (NAICS code 3344) and their authorized distributors (NAICS 4238) within the definitions of critical infrastructure industry sectors as set forth in the “Guidance on the Essential Critical Infrastructure Workforce” dated March 19 and updated March 23, 2020.

ECIA members manufacture everything from microprocessors to capacitors to sensors that are essential to OEMs in making products defined by CISA as “critical manufacturing.” In the language of the CISA guide, electronic components are “needed for medical supply chains, and for supply chains associated with transportation, energy, communications, food and agriculture, chemical manufacturing, nuclear facilities, the operation of dams, water and wastewater treatment, emergency services, and the defense industrial base.” In addition, these electronic components are crucial to the repair and maintenance of manufacturing equipment. It would be difficult to find an industry sector that doesn’t need electronic components to manufacturer products or provide services that are vital to this country’s health and safety.

CISA should also be mindful of the risk that counterfeit products pose as unscrupulous individuals take advantage of the current crisis. Federal, state and local governments should carefully craft their definitions of essential businesses to exclude unauthorized sellers who are at greater risk for selling counterfeit products. Ventilators are but one example among a long list of products that require the inclusion of many types of electronic components and are at risk for the introduction of counterfeit components.

Electronic component manufacturers have an authorized distributors network to distribute and sell genuine components. Many of these distributors have begun to prioritize the fulfillment of orders from companies making medical equipment. Many electronic component distributors provide value-added manufacturing such as programming, connector and harness assembly, and managed inventory for customers. Authorized electronic component distributors fulfill a vital role in the supply chain and should also be considered part of the critical infrastructure and designated as essential businesses.