



ZF North America, Inc.

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Dockets Operations  
U.S Department of Commerce  
Bureau of Industry and Security,  
Office of Technology Evaluation  
14th St. and Constitution Ave., NW  
Washington, DC 20230

Department	Executive
From	Dr. Martin Fischer
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Date	November 5, 2021

Attention: Matthew S. Borman  
Deputy Assistant Secretary for Export Administration  
U.S. Department of Commerce

**RE: Docket No. 210915-0189**

Dear Deputy Assistant Secretary Borman:

ZF North America (ZF) welcomes the opportunity to respond to the Department of Commerce's Request for Information (RFI) regarding the ongoing shortages in the semiconductor product supply chain. ZF is a major semiconductor purchaser and a producer of numerous semiconductor-reliant technologies, and we are eager to inform the Department as it assesses the current status of the market and determines next steps and opportunities to alleviate the crisis.

ZF North America is headquartered in Livonia, Michigan, and is a primary developer and producer of electric mobility, integrated safety, vehicle motion control, automated driving, industrial, marine, and wind technology. We proudly design and produce many of these technologies and products here in the United States.

In the BIS fillable form, ZF provides feedback regarding the ongoing semiconductor shortage and how we are managing the crisis. Due to customer agreements, we are limited in the granularity of the data that we can share. ZF also requests confidential treatment under the FOIA exemptions for trade secrets and proprietary business information for much of the information included in the submission marked BUSINESS CONFIDENTIAL. Despite those necessary precautions, we hope this feedback is instructive as the Department considers how it can play a beneficial role in alleviating the semiconductor supply strain for American manufacturers.

Again, ZF appreciates this opportunity to share our perspective with the Department of Commerce. We stand ready to provide further clarification and insights regarding the feedback provided, as needed.

Best regards,

Dr. Martin Fischer  
President  
ZF North America, Inc.

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