## **GIBSON DUNN**

## Christopher Timura Speaks to Global Investigations Review About the Future of Semiconductor Export Licensing

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Global Investigations Review

Speaking to <u>Global Investigations Review</u> (subscription required), Christopher Timura said semiconductor export licensing requirements will likely remain in place, despite the U.S. Department of Commerce rescinding the Biden-era Al diffusion rule. Christopher told the publication, "I wouldn't necessarily think that just because a quota isn't in place and there aren't limits, doesn't mean there aren't licensing requirements that are still applied to these chips."

The rule was withdrawn two days before implementation, with the department stating it would have "stifled American innovation and saddled companies with burdensome new regulatory requirements" and harmed diplomatic ties by downgrading countries to "second-tier status."

Christopher said the Trump administration is expected to continue targeting the illegal diversion of U.S. technology through new export controls. "There might ultimately be uncertainty for particular jurisdictions as to whether the chips will be allowed into those countries at all." He added that countries previously placed in a more restricted tier may still carry a "strike against them" in licensing decisions.

## **Related Capabilities**

**International Trade Advisory and Enforcement** 

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Christopher T. Timura