

May 12, 2025

The Honorable Howard W. Lutnick
Secretary
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Lutnick,

We write to urge the Department of Commerce to take immediate and targeted action to safeguard U.S. national security interests by adding ChangXin Memory Technologies (CXMT) to the Bureau of Industry and Security's (BIS) Entity List and applying the Foreign Direct Product Rule (FDPR). Our export controls play an essential role in protecting U.S. national security and competitive edge, but for these controls to remain effective, we must update them regularly – and it is long overdue that BIS adds CXMT to the Entity List.

CXMT is rapidly advancing its high-bandwidth memory (HBM) development, which is an essential component in hardware for artificial intelligence. HBM is essential for training large language models, supporting inference at scale, and enabling memory access for AI workloads demand. By some estimates, CXMT is now just three years behind global leaders' HBM development, with plans to bring HBM3 to production by early 2026 and accelerate toward HBM3E shortly thereafter.

China's strategic investment in HBM and AI-enabling hardware is a critical part of its broader push for technological self-sufficiency and its pursuit of dual-use applications that support military modernization. The PRC is leveraging domestic semiconductor advances to fuel its AI capabilities, which will challenge US military and economic interests.

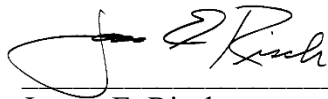
Recognizing this threat, BIS took commendable steps last year by tightening export controls by adding over 140 Chinese chipmakers and equipment manufacturers to the Entity List and identifying HBM as a key chokepoint in AI hardware. However, CXMT was not listed on the Entity List, an omission that is increasingly untenable given the company's trajectory and its role in China's AI ambitions.

Adding CXMT to the Entity List and applying FDPR would significantly constrain CXMT's ability to further advance its technology and production. In particular, applying the FDPR is essential to ensure that CXMT is unable to continue exploiting foreign technology to power its advances. Since 2020, the U.S. has designated more than 760 Chinese firms to the Entity List. This approach has proven effective with companies such as Huawei and should now be extended to CXMT to prevent further erosion of the US advantage in advanced semiconductors and AI.

The time to act is now, before CXMT further closes the technological gap and strengthens China's AI infrastructure in ways that could threaten both US security and global technology leadership.

Thank you for your continued efforts to protect U.S. national security and your attention to this matter.

Sincerely,

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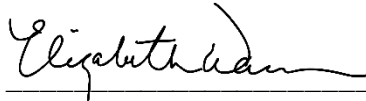
James E. Risch
United States Senator

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Charles E. Schumer
United States Senator

A handwritten signature in blue ink, appearing to read "Mike Crapo", written over a horizontal line.

Mike Crapo
United States Senator

A handwritten signature in blue ink, appearing to read "Elizabeth Warren", written over a horizontal line.

Elizabeth Warren
United States Senator

Cc: The Honorable Marco Rubio, Secretary of State