



National Electrical Manufacturers Association

KEVIN J. COSGRIFF

President and Chief Executive Officer

BY EMAIL: CISA.CAT@cisa.dhs.gov

March 27, 2020

Christopher Krebs, First Director
Cybersecurity and Infrastructure Security Agency Stop 0380
Department of Homeland Security
245 Murray Lane
Washington, D.C. 20528-0380

Re: Electrical Product/Medical Imaging Sector Qualifies as Essential Manufacturing

Dear Director Krebs:

On behalf of the National Electrical Manufacturers Association (NEMA) and its Member companies,¹ I am writing to request that electrical products/systems and medical imaging devices be explicitly acknowledged as “*essential to continued critical infrastructure viability*” in CISA’s Guidance on the Essential Critical Infrastructure Workforce: Ensuring Community and National Resilience in COVID-19 Response.

The electrical manufacturing sector undoubtedly contributes to public health, safety, and security and its continued, full-capacity operation is a crucial element of the nation’s response to the COVID-19 crisis. The litany of electrical products that sustain our national infrastructure includes, but is not limited to:

- Fire and life safety equipment such as fire and smoke alarms, carbon monoxide detectors, and building controls critical to first responders to fight building fires;
- Lighting equipment of all kinds including street and security lighting, building exit signs, and emergency lighting;
- Motors and generators;
- Batteries, which power innumerable electrical and electronic devices, including critical healthcare equipment and devices;
- Circuit breakers, ground fault circuit interrupters and fuses that prevent fires and other electrical hazards;
- Equipment sold to utilities for the generation and distribution of electricity; and
- Medical imaging equipment sold to hospitals and clinics.

¹ NEMA is the primary trade association representing the interests of the US electrical products and medical imaging industry. Our 325 member companies provide the products and systems that supply power to every aspect of human endeavor while promoting *effective health care through screening, diagnosis and treatment*.

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The CISA guidance specifically designates the following industry sectors as “*essential to continued critical infrastructure viability*.” Medical and healthcare, telecommunications, information technology systems, defense, food and agriculture, transportation and logistics, energy, water and wastewater, law enforcement, and public works. ***None of these sectors could function effectively without the safe, efficient, and reliable supply of electrical power, which constitutes a core purpose of the electrical manufacturing industry.***

As large segments of our population are increasingly advised to “shelter-in-place” and the virus strains the capabilities our hospitals, medical centers, and first responders, we must not inadvertently erect obstacles to the goods and services we need to outlast this crisis. On this basis we therefore urge CISA amend its guidance within the **Energy/Electricity industry Section** to designate workers manufacturing electrical products/systems and medical imaging devices as “*essential to continued critical infrastructure viability.*”

If you have questions about our industry or NEMA’s position on this matter, please contact Philip Squair at philip.squair@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Kevin J. Cosgriff". The signature is written in a cursive, flowing style.

Kevin J. Cosgriff
President and Chief Executive Officer