2 February 2007

The Honorable David M. Walker
Comptroller General of the United States
Government Accountability Office
441 G Street, NW, Room 7100
Washington, DC 20548

Dear Mr. Walker:

We are writing in response to the recent Government Accountability Office report, *Global Competitiveness: Implications for the Nation's Higher Education System*, which we found disappointing and biased in a number of respects.

IEEE-USA salutes your interest in holding a forum to improve America's competitiveness. We have been working hard on the policies that improve America's competitive position for more than two decades and, like you, we are concerned that the U.S. needs major changes to policies to maintain our technological lead. We invite you to go to our website highlighting these policy issues at http://www.ieeeusa.org/policy/issues/innovation/index.asp.

We suggest that you could improve the report by describing your selection process of the experts for the forum. The makeup of the group is critical given that the report relies almost exclusively on their opinions, even ignoring pertinent work that the GAO has done. This is particularly important given that you decided to wade into some very controversial issues such as high-skill immigration and non-immigrant visas.

The GAO report included at least a few representatives who have taken public positions lobbying for an expansion of the H-1B program, but not a single person that expresses concern about the program. And while your report makes a number of recommendations to expand visa programs like the H-1B, you do not balance that discussion with material from anyone else, or even your own organization's numerous reports on the program's weaknesses and flaws. And while your bibliography includes four GAO reports on the H-1B program, you do not include any of the findings in the text of the report.

It is very disappointing that you would take sides on such issues, rather than be a neutral observer. Good public-policymaking requires a fact-based discussion that acknowledges the varied interests of different groups. IEEE-USA hopes that you will modify the report to reflect our suggestions, and that you cast a wider net when identifying experts for all of your forums in the future. Any discussion of international students in higher education should include organizations that represent U.S. students and workers, who are the critical element of any efforts to boost U.S. competitiveness.

Sincerely,

Ron Hira, Ph.D., P.E.
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Assistant Professor of Public Policy, Rochester Institute of Technology;
Research Associate, Economic Policy Institute