

AMHERST
August 10, 2004

Chief of Records
ATTN: Request for Comments
Office of Foreign Assets Control
Department of the Treasury
1500 Pennsylvania Ave., NW
Washington, D.C. 20220

Re: OFAC, Treasury; FR Doc 04-13630

Dear Sir or Madam:

I am writing to protest the "Interim Final Rule" amending the Cuban Assets Controls Regulations, Part 515 of chapter V of 31 CFR Part 515.565, and urge you to rescind the new curbs on U.S. educational programs in Cuba, as they are unjustified and grossly interfere with longstanding academic practices.

The proposed rule puts an end to virtually all academic programming and educational exchanges in Cuba. Furthermore, as currently drafted, the proposed rule makes designing and implementing new academic opportunities for students a fiscal and logistical near impossibility.

While the proposed rule aims to further U.S. foreign policy objectives, the supposed benefits of the rule's objectives are far outweighed by the dangerously restrictive steps that it represents. Specifically, the proposed rule violates academic freedoms by dictating the minimum length of an academic program, barring colleges and universities from working together or with outside providers to establish academic programs, and restricting which employees or contractors a college or university may use to deliver its services.

Ironically, the United States has long established and supported educational exchanges to further its objective of furthering democracy. Such efforts have had demonstrable success throughout the world. The proposed rule constitutes a step backward from the U.S. commitment to these goals and a proven successful strategy of fostering these principles.

For over 35 years, the Center for Cross-Cultural Study has designed academic programs and exchanges that break down cultural boundaries and further our shared principles. On behalf of CC-CS, I respectfully request that you rescind the new restrictions on academic programming in Cuba and allow us – and our colleagues – to extend such opportunities to our students.

Sincerely,

Dr. Judith M. Ortiz
Academic Director
Director, U.S.