Impact of Export Controls on Higher Education and Scientific Institutions

May 23-24, 2016

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Keri Godin is the Director of the Office of Research Integrity at Brown University. In this role, Keri has oversight of all research-related regulatory compliance at Brown, including direct responsibility for developing, refining, and implementing the University’s export control compliance program. Prior to joining Brown in 2015, Keri was at Harvard Medical School for ten years, the latter half of which she was in the trenches performing day-to-day export control compliance functions for the Medical School and served on the University-wide Export Control Counsel. She has acted as an independent consultant for Boston-area hospitals to provide export control compliance education to research administrators, and is a newly admitted member of the Association of University Export Control Officers (AUECO).
Janet Johnston is the Massachusetts Institute of Technology **Export Control Officer**. She joined the MIT Compliance Office on 1 September 2015 succeeding David Quimby. MIT alumna—BS Physics (Astrophysics), BS Earth and Planetary Sciences (planetary physics), MS Earth and Planetary (seismology); MS Civil Engineering (structural and geotechnical).

**Prior**: 33 years with the Air Force  
--29 with Air Force Research Laboratory  
  Geophysicist/ Astrophysicist – PI and Program Manager for international Solar Mass Ejection Imager Space Experiment; creator/director of the Space Weather Forecasting Laboratory  
Included:  
- 1 year at the Pentagon (DDR&E)-- Research Laboratory Management lead  
- 4 years as Liaison Officer for United States Air Force European Office of Aerospace Research and Development (in London and Moscow)  
- 4 years New Business lead Foreign Military Sales and Missile Technology Control Regime (MTCR) certifier at Hanscom AFB.
Michael Miller is the Associate Director for Export Controls for the University of Central Florida (UCF). He joined UCF in 2009 where he was responsible for developing and implementing the institution-wide export compliance program as an empowered official. His work involves day-to-day operational management and improvement of the program to ensure compliance with U.S. export control laws and regulations. Prior to joining UCF, he worked in for ten years in the defense industry specializing in international trade compliance and has directed the implementation of FOCI-compliance export control and facility security activities for major international defense contractors reporting to the board of directors as an empowered official. He spent five years working for the U.S. Army, PEO-STRI on Foreign Military Sales cases, and has executed over 22 programs. He holds a Bachelor’s degree in Legal Studies and Master of Science degree in Criminal Justice from the University of Central Florida. Mr. Miller is a member of the Association of University Export Control Officers (AUECO), a member of the Society for International Affairs (SIA), and has served as an appointed committee member of the Defense Trade Advisory Group (DTAG) to the U.S. Department of State, Bureau of Political-Military Affairs for the 2012 – 2014 term.
Presenters

David Quimby was MIT's campus export control officer for 5+ years, helping faculty and staff fulfill their mission and comply with US regulations, working with contract and technical people from sponsors and partners who all need to be aligned.

As export control officer for a signal processing equipment manufacturer, Dave learned the value of a well-written CJ. As operations manager dealing with European subsidiaries, he learned about international trade and governance. As engineering manager and product manager, he learned how technology really progresses from concept to reality.

Dave believes that his experience with industry and technology helps him bridge the boundary between the open university world and the restricted industry/government world.

Dave has a BS from MIT and an MBA from Columbia.
Presenters

Zach Sweet, manages the Export Compliance and Release Review processes for MIT Lincoln Laboratory, a Federally Funded Research and Development Center operated by the Massachusetts Institute of Technology. Prior to joining the Laboratory, Zach worked as a Foreign Affairs Specialist (GS-13) for the Deputy Under Secretary of the Air Force, International Affairs, Foreign Disclosure and Technology Transfer Division (SAF/IAPT) in Washington, DC and as a senior analyst at CSP Associates in Cambridge, MA. He holds a BA in English from Emory University and an MA in International Affairs from The George Washington University.
Agenda

• Background
• Planning: forming the agenda, setting expectations for the visit
• Individual university experiences
• Similarities, Differences & Lessons learned
• Q & A
Background

• Strategic goal is to observe how universities “establish and implement defense trade control compliance programs IAW the ITAR.”

• “Learn unique challenges universities encounter in meeting ITAR responsibilities and how these challenges are addressed”

• Government Accountability Office Report GAO-07-70
Export Controls: Agencies Should Assess Vulnerabilities and Improve Guidance for Protecting Export-Controlled Information at Universities, December 2006

Risk:
“Foreign students and scholars have made substantial contributions to U.S. research efforts and technology development. However, according to a federal government intelligence assessment, foreign access to sensitive U.S. technology has imposed a significant but unquantifiable cost to the United States.”

Findings:
“State and Commerce have not conducted an overall assessment of available trend data on technology development research and foreign participation in such research at U.S. universities to identify potential vulnerabilities.”

DDTC Company Visit Program
GAO Recommendations

“Strategically assess potential vulnerabilities”

“Assess the extent to which research at universities may be subject to export controls”

“Assess potential vulnerabilities of university research...**conductor additional outreach**, and improve guidance”
What is a CVP?

• 1-2 day, on-site facility review to learn how registrants establish overall defense trade compliance programs.

• Purpose:
  • Identify risks in export compliance programs
  • Learn how universities embed ITAR-compliance operationally
  • Challenges facing universities in meeting ITAR responsibilities
  • Level of research activities subject to export controls
  • Identify vulnerabilities

DDTC Company Visit Program
Authority

Arms Export Control Act (AECA) (22 U.S.C. 2778)
- Authorizes the President to Control the Import and the Export and Brokering of Defense Articles and Defense Services.

International Traffic in Arms Regulations (ITAR) (22 C.F.R. Parts 120-130)
- Registration (§§122.1)
- Record-keeping (§ 122.5)
Selection for a CVP

Referral
• Your university requests a CVP

Selection
• Meet criteria (e.g. license, USML Cats, funding levels) for current DDTC issue under study
• Effectiveness, or lack thereof, of compliance program

Notification
• Phone & official letter
• Background materials & compliance documentation will be requested
• Response due to DDTC within 30 days
## Participant Metrics

<table>
<thead>
<tr>
<th>University</th>
<th>Date</th>
<th>FRE Status</th>
<th>DS-2032</th>
<th>USML Cat's</th>
<th>Research $</th>
<th>VSD</th>
<th>Location</th>
<th>Student</th>
<th>Faculty</th>
</tr>
</thead>
<tbody>
<tr>
<td>UCF</td>
<td>Oct-14</td>
<td>EC Work Accepted</td>
<td>Yes</td>
<td>14 of 21</td>
<td>$145M</td>
<td>No</td>
<td>Southeast</td>
<td>62,000</td>
<td>2256</td>
</tr>
<tr>
<td>MIT</td>
<td>Dec-14</td>
<td>FRE only</td>
<td>Yes</td>
<td>2 of 21</td>
<td>$700M</td>
<td>Yes</td>
<td>Northeast</td>
<td>11,000</td>
<td>1100*</td>
</tr>
<tr>
<td>MIT-LL</td>
<td>Dec-15</td>
<td>EC Work Accepted</td>
<td>Yes</td>
<td>11 of 21</td>
<td>$937M</td>
<td>Yes</td>
<td>Northeast</td>
<td>N/A</td>
<td>N/A</td>
</tr>
<tr>
<td>Brown</td>
<td>Dec-16</td>
<td>FRE only</td>
<td>No</td>
<td>None</td>
<td>$174M</td>
<td>Yes</td>
<td>Northeast</td>
<td>9120</td>
<td>740</td>
</tr>
</tbody>
</table>

* 1,100 PI’s, not faculty
Planning

• Forming the agenda
• Setting expectations for the visit
• Providing documents before the visit
• Preparing the campus for the visit
• Conducting the visit -- especially any surprises
• Cost, benefit, follow-on impact of the visit

Panel discussion

DDTC Company Visit Program
Timeline (weeks)

1. Initial contact
2. Con call with DDTC
3. Finalize week of visit
4. Finalize dates
5. Receive notification, proposed agenda, information request
6. (Holiday)
7. Discuss agenda with DDTC
8. Submit information to DDTC
9. Submit final agenda to DDTC
10. DDTC team identified
11. Visit

DDTC Company Visit Program

May 5, 2014
Forming the agenda: “must” items

• Overview and objectives (DDTC)
• University overview
• Export compliance structure: policy, practices, roles & responsibilities
• Contact outside the meeting room
Forming the agenda: flexibility

• DDTC may suggest topics
  – “Understanding universities” topics
  – Topics based on what they know about you

• You can suggest topics:
  – What do you want DDTC to understand better?
  – What are you proud of?
  – What would you like DDTC’s thoughts about?

• You need to propose “tour” destinations
  – *Tours should be appropriate for your institution*
  – Research labs (ground zero)
  – Campus/facility tour

• Inquire of other department & unit destinations
  – Visa office
  – IT security office
Setting expectations for the visit

• With DDTC
  – What will they see
  – Who will they meet with (especially senior leadership)
  – Agenda

• With researchers and functional managers
  – Who’s coming, what they’re interested in
  – Commitment of time and resources for visit

• With your leadership
  – Potentially consequential engagement
  – Commitment of time and resources for visit
Providing documents before the visit

Strong EC programs will have the following:

*Submit drafts or highlight strong points for deficient documents*

- Organization, legal structure, functional organization
- Compliance policy, procedures, manual
- ITAR activity overview: programs, services, licenses, agreements, exemptions
  - Consider identifying areas with no ITAR involvement
- IT compliance policies, procedures
- Training materials, records
- CJ requests, voluntary disclosures
Preparing campus for the visit

• Brief everyone who will meet with DDTC
  • Export control refresher
  • Reminder of policies and procedures
  • Reminder of campus export control resources
  • Review any TCPs, licenses, agreements
  • Questions they might expect from DDTC
  • Do not VSD in the form of a question
• Brief senior leadership
  • Reminder of their responsibility as seen by DDTC
• Developing content & presentations for the meeting
  • Dry-run of presentations

DDTC Company Visit Program
## Sample Agenda (UCF)

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
</tr>
</thead>
<tbody>
<tr>
<td>0900 - 0915</td>
<td>Company Visit Overview &amp; Objectives: Office of Defense Trade Controls Compliance Team Leader</td>
</tr>
<tr>
<td>0915 - 0930</td>
<td>Provost Welcome, Structure &amp; Commitment to ITAR Compliance</td>
</tr>
<tr>
<td>0930 - 0945</td>
<td>VP for Research Briefing: Research Overview</td>
</tr>
<tr>
<td>0945 - 1000</td>
<td>Compliance &amp; Ethics Briefing</td>
</tr>
<tr>
<td>1000–1015</td>
<td>Research Compliance Briefing</td>
</tr>
<tr>
<td>1030 - 1130</td>
<td>Export Compliance Briefing: Structure, Policy Overview, Practices &amp; Reporting, Empowered Officials</td>
</tr>
<tr>
<td>1130 - 1215</td>
<td>Campus Tour</td>
</tr>
<tr>
<td>1215 - 1245</td>
<td>Lunch</td>
</tr>
<tr>
<td>1300 - 1345</td>
<td>Physical Sciences, Laboratory Tour</td>
</tr>
<tr>
<td>1345 – 1430</td>
<td>Electrical Engineering, Laboratory Tour</td>
</tr>
<tr>
<td>1445 – 1545</td>
<td>Proposal Team Interviews (equivalent to BD, Sales, Marketing)</td>
</tr>
<tr>
<td>1600 – 1615</td>
<td>Travel to Office of Research &amp; Commercialization</td>
</tr>
<tr>
<td>1615 – 1715</td>
<td>Contracts Team Interviews: Role that Contracts play in the Export Compliance Process</td>
</tr>
</tbody>
</table>

DDTC Company Visit Program

AUECO

Association of University Export Control Officers
### Sample Agenda (UCF)

#### Day 2

<table>
<thead>
<tr>
<th>Time</th>
<th>Event</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>0900 – 1000</td>
<td>Human Resources &amp; Visa Services: Foreign National &amp; Hiring Practices</td>
<td>Visa Office</td>
</tr>
<tr>
<td>1000 – 1015</td>
<td>Travel to Office of Research &amp; Commercialization</td>
<td>Travel</td>
</tr>
<tr>
<td>1015 – 1200</td>
<td>Program Management &amp; Record Keeping</td>
<td>Research</td>
</tr>
<tr>
<td>1200 – 1315</td>
<td>Lunch</td>
<td></td>
</tr>
<tr>
<td>1315 – 1415</td>
<td>IT Systems Security and Cloud Computing: Overview from an ITAR Compliance Perspective</td>
<td>Research</td>
</tr>
<tr>
<td>1415 – 1500</td>
<td>Training</td>
<td>Research</td>
</tr>
<tr>
<td>1500 – 1515</td>
<td>Break</td>
<td></td>
</tr>
<tr>
<td>1515 – 1545</td>
<td>Security: Interaction with Export Compliance</td>
<td>Research</td>
</tr>
<tr>
<td>1545 – 1600</td>
<td>Travel to Board Room for Out-briefing</td>
<td>Travel</td>
</tr>
<tr>
<td>1600 – 1630</td>
<td>Review</td>
<td>Board Room</td>
</tr>
<tr>
<td>1630 – 1700</td>
<td>Close - Out</td>
<td></td>
</tr>
</tbody>
</table>

DDTC Company Visit Program

AUECO

ASSOCIATION OF UNIVERSITY EXPORT CONTROL OFFICERS
Cost, time, resources

- Export control staff: most of your time for 2 months
  - Drain on EC function to other duties
  - Information collection and packaging
  - Planning
  - Briefing and prep
  - Meeting content development
- General counsel, research administration: multiple meetings over 2-month period
  - Planning, potential issues
- Researchers, Functional managers
  - Planning
  - Briefing and prep
  - Meeting content development
- Senior leadership
  - Planning
  - Briefing and prep
  - Potential for follow-on resource “suggestions”

DDTC Company Visit Program
Individual University Experiences

- MIT
- MIT-LL
- Brown
- UCF
MIT Campus

• Agenda – how what DDTC asked for differed from what we gave them

• My approach (message)

• Risks

• Their hot buttons
MIT Campus: Want/Get

DoS stated up-front that the purpose of the visit was not for an audit or inspection

- My impression from pre-visit material is they wanted a lot of interaction with the ground troops – walk-throughs in various labs, etc. Informal to a certain extent.

- We arranged a structured tour of one of our center’s labs that uses ITAR/EAR restricted material. Also a lecture on the science, with not a lot of time for Q&A given the full schedule.

- Otherwise we added an IT protection presentation and showcased new initiatives such as our new shipping procedure, designed to capture every international shipment, our just initiated annual review of all TCPs for status and disposition of material if project ended. Also included some special collaborations (see risk slide)
MIT Campus: My Message

- That one person can’t do it alone at a large university. MIT has within its infrastructure a network that is constantly being trained, updated, added to and tightened up to support Export Control Compliance.

Those born outside of US:
- 10 percent of undergraduate students
- over 40 percent of graduate students
- 65 percent of post-doctoral fellows
- 42 percent of MIT's faculty

- Also, we are initiating new systems and procedures to improve compliance.
Risks

Introducing them to programs they may not know about, examples: (could backfire)

• MIT Skoltech Initiative Institute (Skolkovo Foundation and MIT to collaborate on developing the Skolkovo Institute of Science and Technology with Russia)
• MIT Masdar Institute (collaborative program with Abu Dhabi)
• Lincoln Laboratory Beaver Works (joint center between MIT Lincoln Laboratory and MIT School of Engineering).

Opening up cans of worms:
• IT protection
• Disposal of restricted material

DDTC Company Visit Program
MIT Campus: Hot Buttons

• Disclosures.* They implied that if an institution submits some voluntary disclosures occasionally, it gives them confidence that the institution has a vigilant compliance program.

• Training was mentioned multiple times and was one of the few things mentioned in their closeout letter to us. They expect us to record names of trainees, not just dates and departments. Also, expect to see proactive scheduled training sessions by ECO, not just when a department or lab requests it.

*Late-breaking news: DDTC just ruled that an old VD we made in 2014 was in fact a violation. Their letter implied that because our CV went so well, no penalties would be applied!
MIT LL: Consulting Agreements

- LL primarily performs controlled research, but funds a significant amount of FR research at universities.

- A consulting agreement may be pursued when the need to work with a university personality is significant but:
  - The subcontract cannot be structured to preserve FRE
  - The activity requires access to EC data

- Consulting agreements are negotiated between MIT LL and in the individual
  - Not reviewed by the Office of Sponsored Programs (or equivalent entities)
  - Requirements to comply with EC are placed on the individual

- Consider addressing such arrangements in your EC policy
  - No data provided under consulting agreements stored on university servers

DDTC Company Visit Program
A Chance to Fly
Aero-astro's Beaverworks class to commemorate challenge: designing drones for climate change

The Washington Post

Veil of secrecy lifted on Pentagon office planning ‘Avatar’ fighters and drone swarms

The Washington Post

The killer robot threat: Pentagon examining how enemy nations could empower machines

The Washington Post

Watch Perdix, the secretive Pentagon program dropping tiny drones from jets

Link to video

DDTC Company Visit Program
MIT LL Planning (continued)

• Answer the basics, but speak to (or be ready to speak to) potential areas of concern

• Highlight the benefits your institution provides to USG and DoD in particular

• Negotiate an agenda to highlight your strengths, but also to raise/”disclose” issues of concern to your institution/EC program
  • MIT LL’s policies/mechanisms for funding FR at universities
  • MIT LL Beaver Works Center

• Set your leadership’s expectation on the impact the visit will have on your office’s ability to serve your customers

• Do all you can to “get right” or demonstrate you are working towards that goal
Execution (MIT LL)

• A well-organized, comprehensive “pre-package” is important
  • It’s a lot of info for DTCC to get through, so organize and annotate
  • Give them what they ask for; explain what you are not able to provide

• Highlight the benefit(s) your institution provides USG
  • Show you are a trusted partner

• Place your EC office/responsibilities in the context of your institution’s broader security posture

• Allow your Leadership to demonstrate their knowledge and commitment to EC
  • If Leadership will provide an overview, make sure there is a more than passing tie-in to EC

• Organize a dry-run:
  • Improves organization and consistency of your institution’s message
  • Reduces redundancy (when redundancy is not advantageous)
Don’t let a crisis go to waste

• Gaining support for export compliance initiatives is an uphill battle at most institutions (academic, corporate, or otherwise)

• A company visit should get Leadership’s attention
  • It might be your first opportunity to meet with/introduce yourself to Leadership

• Use the visit to elevate your office’s mission and push important initiatives
  • Demonstrate to Leadership the importance of what you do
  • Convince them of what more needs to be done
Brown – 1st FRE to the plate

- Voluntary Disclosure (presumably) catalyst for visit
- Company Visit served dual roles – true ‘visit,’ but also used to investigate VD
- Tone established early on – collegial, with a sincere effort to understand what we do & how we do it
- Agreed to disagree (and not debate) each party’s interpretation of “fundamental research”

Who showed up?
✓ Marissa Cloutier, DDTC Compliance Specialist
✓ Paul Lacombe, Senior lead, DDTC Compliance
✓ David Aron, DDTC Licensing
✓ Melanie Flaharty, DDTC Compliance Specialist
Massaging the Agenda

• Make them work for you
  - Brown requested a CJ presentation & a Registration presentation (prompted good dialogue, chance to ask them questions – how often do you get 1-on-1 time with DTCC folks?!)  

• Brown rearranged agenda & changed proposed topics to prioritize our FRE message – set the stage early (on Day 1)

• Highlighted Brown’s strengths, but also presented program improvement initiatives – don’t pretend you’re perfect
Demonstrate your commitment

• Who will communicate with DTCC contact from start to finish?
  ➢ Brown thought it was important to designate one senior point of contact (Director, Office of Research Integrity) for all correspondence with DTCC

• Who will participate?
  ➢ Time to bring out the big guns – Brown ensured that the Vice President for Research, Chief Information Security Officer, and the Provost (among others) met face-to-face with the DTCC visitors

• Prepare, prepare, prepare
  ➢ Brown had in-person, sit down briefing sessions with every individual participating in the site visit (including wide-eyed, slightly terrified students)
Areas of Heightened Interest

• Faculty training – who, how often and how?
• Faculty acting as independent contractors vs. wearing their University-employee hats
• Monitoring FRE over time – how does one ‘monitor’ a fundamental research project over time to determine if it is no longer fundamental research?
• Lack of appreciation / understanding regarding why any institution would NOT want to register with state
AND....
• They were enamored with one of the faculty / labs they visited – even asked for a photo op! (Which we permitted)
The takeaway? They may be from DTCC, but cool science is always a great distraction.
UCF

- Environmental factors that led to visit
  - 400+ local defense contractors
  - 2M visitors yearly to Orlando
  - USML Cats – 14 of 21 / 80+ PI’s
- Focus was on processes & records management
- “How we do what we do”
  - Determine:
    - which programs are FRE
    - proprietary research & self-classification
    - ITAR programs & USML classification
- Visa processing
- Cloud computing
Procedures

ECO-1 Preliminary Assessment
C&G reviews Proposals & Awards for red-flags

ECO-2 Comprehensive Assessment
Export controls reviews all documentation Conducts analysis

ECO-3 Notification of Findings
 PI’s issued notice for all work that is not “fundamental research”

ECO-4 Technology Control & Security Compliance
Export Control & PI implement Technology Control Plan

ECO-5 Government Approval (Licensing)
Foreign Person’s requiring participation or access require license
Checklists

Office of Export Controls
Preliminary Export Control Assessment

1. Reviewer
   a. Name
   b. Title
   c. Organization

2. Review Type
   a. Pre-Award
   b. Post-Award

3. Investigator Information
   a. Investigator ID
   b. Name
   c. Title

4. Sponsor Information
   a. Sponsor ID
   b. Name
   c. Title

5. Other Amplifying Data
   a. Project
   b. Sponsor

6. Foreign Components
   a. Nature of Activity
   b. End Use
   c. End User

7. Project Inputs
   a. Inputs
   b. Outputs

8. Technology
   a. Technology Type
   b. Technology Description

9. Pre/Post Award Export Assessment
   a. Pre-Award
   b. Post-Award

10. Assessment Determination & Certification
    a. Determination
    b. Certification

Office of Export Controls
Comprehensive Assessment Worksheet

1. Assessment Type
   a. Edification
   b. Distribution
   c. Export

2. Assessment Notes
   a. Input
   b. Conduct
   c. Output

Previous Editions Obsolete

Date: 11 October 2013
Similarities

• DDTC team members were collegial, showed they learned from Q&A, didn’t ask “gotcha” questions (with minor exceptions)
• DDTC had thoughts about agenda and topics, but open to changes
• DDTC focus on was understanding institutional FRE practices
  – Not trying to change how FRE is determined
• Interactions were with planned participants, not passers-by
• DDTC seemed to enjoy seeing what researchers are doing
• Training!
Differences

• DDTC selected a diverse group of universities
• Unresolved voluntary self-disclosures
  – Aggressive questioning at Brown
  – Little or no mention at MIT
• More focus on determining FRE status vs. export controlled at UCF.
  – FRE was a topic at Brown/MIT only to the extent those institutions made it a discussion.
• DDTC willing to teach when asked (Brown)
Lessons Learned

• Cooperate and welcome the visit. It is nothing more than “information sharing.”
• Prepare for the visit as an audit.
• Universities are not corporations. Be prepared to explain business practices.
• Say what you do, not what you “want to do.” Don’t make stuff up.
• Explain your procedures, but let the visitors validate everything you say you do on their own.
• Let the visitors interact with as many people as possible.
• The focus is ITAR, but also prepare for other export regimes.
• Prepare a number of informative briefings.
• Suspect violations should be reported via VSD.
• “Never phrase your disclosure in the form of a question” - Bob Kovacs

DDTC Company Visit Program
Q & A

DDTC Company Visit Program
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