

Lynnette C. Fallon
Executive Vice President HR/Legal and General Counsel
Direct Dial: [REDACTED]
[REDACTED]



March 2, 2017

Mr. Michael S. Piowar, Acting Chairman
Securities and Exchange Commission
100 F Street, NE
Washington, DC 20549

Dear Acting Chairman Michael S. Piowar and SEC Staff,

I applaud the Acting Commissioner's directions to reconsider the Commission's guidance relating to the Conflict Mineral Rule incorporated in Section 1502 of the Dodd Frank Act. Axcelis Technologies, Inc. designs and manufactures ion implanters, which are capital equipment used to make semiconductor chips. Axcelis common stock has been publicly traded on Nasdaq since 2000. A single ion implanter contains more than 10,000 parts, and Axcelis has more than 800 material suppliers in any one year.

The reasonable country of origin inquiry ("RCOI") required by Section 1502 involves several weeks of work for Axcelis employees, contacting each of these suppliers and querying them about the source of any tin, tungsten, tantalum or gold used in any parts we buy. In most cases, our vendors themselves purchase components from others and do not know fully the content and source of materials they sell us. A substantial volume of work is also imposed on our vendors who must respond to all customers that have obligations under Section 1502.

After all this effort, our Form SD for Conflict Minerals simply reports the statistics resulting from the RCOI process and any required due diligence. Accordingly, the Form SD states the number of vendors contacted, the number of vendors who replied, the number of vendors who said they may source from the Congo, and whether the source is unknown, known to be conflict-free or otherwise. Given the substantial amount of unknown source information, the quality of the results produced by the RCOI and any due diligence we conduct, is low, and does not provide definitive information for investors or other interested parties regarding the ultimate source of conflict minerals in our products.

Accordingly, from a cost/benefit analysis, we do not feel that the value of the information provided in the Form SD required under Section 1502 justifies the time and effort invested by Axcelis and by our entire product materials supply base.

I would be happy to comment further or provide additional information if useful this topic.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Lynnette Fallon', is written over a light blue circular stamp.

Lynnette C. Fallon
Executive Vice President HR/Legal and General Counsel