



June 17, 2019

**VIA REGULATIONS.GOV**

The Honorable Robert E. Lighthizer  
U.S. Trade Representative  
Office of the U.S. Trade Representative  
600 17th Street, NW, Room F516  
Washington, DC 20508

**Re: Request for Public Comment Concerning Proposed Modification of  
Action Pursuant to Section 301: China's Acts, Policies, and Practices  
Related to Technology Transfer, Intellectual Property, and Innovation  
[Docket No. USTR-2019-0004]**

Dear Ambassador Lighthizer:

The Motor & Equipment Manufacturers Association (MEMA) respectfully submits these written comments to the *"Request for Public Comment Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation"* issued by the Office of the United States Trade Representative (USTR) [Docket No. USTR-2019-0004].<sup>1</sup> The USTR has proposed a 25 percent *ad valorem* rate of duty on HTS codes, including certain motor vehicle components, on \$300 billion in imports from China. This is the fourth tranche of Section 301 actions taken by the USTR. MEMA respectfully requests that the products addressed in Attachment 1 of our comments be removed from USTR's List 4 proposal. In addition, our members are increasingly concerned about the cumulative impact of 25 percent tariffs on the total \$550 billion in imports from China on consumers, the motor vehicle parts industry and on the overall U.S. economy.

MEMA represents 1,000 vehicle suppliers that manufacture and remanufacture new original equipment ("OE") and aftermarket components and systems for use in passenger cars and commercial vehicles.<sup>2</sup> Our members lead the way in developing advanced, transformative technologies that enable safer, smarter, and more efficient vehicles, all within a rapidly growing global marketplace with increased regulatory and customer demands. Our members range in size from large, multi-national corporations to small- and medium-sized enterprises.

MEMA strongly supports the overall objectives of the USTR China Section 301 investigation. We agree that intellectual property rights (IPR) theft, forced technology transfer and a range of additional Chinese market distorting practices must be eliminated. This systemic approach to Chinese competition is a welcome and critical part of the Trump Administration's emphasis on encouraging domestic manufacturing.

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<sup>1</sup> 84 Fed. Reg. at 22564

<sup>2</sup> MEMA represents its members through four divisions: Automotive Aftermarket Suppliers Association (AASA); Heavy Duty Manufacturers Association (HDMA); Motor & Equipment Remanufacturers Association (MERA); and, Original Equipment Suppliers Association (OESA).



However, MEMA urges a more measured approach in attaining these objectives. Sustained bilateral negotiations with China that pocket progress as it occurs, as well as multilateral negotiations and pressure in concert with our USMCA, EU, Japan and other allies, will level the playing field with China over the long term. We encourage the U.S. to resume negotiations with China as soon as possible.

MEMA also remains concerned about tariffs on hundreds of HTS codes covering vehicle materials, chemicals, subcomponents, and parts under the Section. 301 third tranche, covering \$200 billion in imports. While we support the creation of an exclusion process for List 3, which is expected to be published around June 30, supplier members have experienced delays and lack of transparency on previous Lists 1 and 2 product exclusion requests' processes. The list of HTS codes under List 3 about which MEMA members have indicated are problematic is re-submitted with these comments as Attachment 2. Finally, MEMA is concerned about the significant workload increase facing the USTR to process the tens of thousands of expected vital exclusion requests.

The USTR's proposed List 4 tariffs on motor vehicle related materials and products, coupled with the large-scale increase in List 3 tariffs impacting hundreds of HTS codes of vehicle parts, subcomponents and materials, will have a disproportionate and significant harmful impact on U.S. consumers who rely on affordable products for the repair and maintenance of their vehicles. Furthermore, motor vehicle component and system manufacturers will face significant cost increases, which they will not be able to absorb. That means new vehicle cost increases for consumers. The combined third and fourth tranches of 25 percent tariffs on \$500 billion in imports are much more problematic for MEMA members, and for the overall U.S. economy, than the previous level of 10 percent tariffs on the third tranche of \$200 billion in imports from China.

These increased costs threaten the success of small- and medium-sized U.S. businesses and their employees that depend on a reliable supply of materials, subcomponents, and parts to make repairs to vehicles. Tariffs on these products could lead to downsizing, layoffs, or even cause certain U.S. production to move overseas. Thus, tariffs, particularly at this scale, can have the opposite effect of their intention.

Administration of the tariffs and related product exclusion applications will also harm the Office of the USTR, a small federal agency dedicated to negotiating and passing trade agreements that open export markets with our trading partners. The tariffs and related exclusion processes divert the USTR from its vital core mission and objectives such as: working on the passage and implementation of the U.S.-Mexico-Canada Agreement (USMCA) to reinforce the North American trading relationship and to strengthen U.S. and regional manufacturing; negotiating a trade agreement with Japan to open export markets for vehicles and vehicle parts; and, working to begin negotiations on a trade agreement with the European Union (EU). The USTR's assistance in clarifying the USMCA automotive rule of origin provisions has been critical to MEMA, and we support passage of USMCA. Unfortunately, new tariffs, including these under discussion in this filing, divert attention and resources away from USMCA discussions.

#### **A. MEMA BACKGROUND**

Vehicle suppliers are the largest sector of manufacturing jobs in the United States, directly employing over 871,000 Americans in all 50 states plus the District of Columbia. Together with indirect and employment-induced jobs, the total employment impact of the motor vehicle parts manufacturing industry is 4.26 million jobs. Nearly \$435 billion in economic contribution to the U.S.

GDP is generated by motor vehicle parts manufacturers and its supported activity. In total, motor vehicle parts suppliers contribute more than 75 percent of the value in today's vehicles.

MEMA members operate in a global supply chain of domestic and international suppliers and customers. China is a large and important trading partner for the supplier and motor vehicle manufacturing industry. However, parts imports from China are only about 13 percent of total imports, less than half of what our members import from Mexico. The volume of imports from China is very similar to the volume from Canada, the EU and Japan.<sup>3</sup>

MEMA members do source certain motor vehicle materials, parts and equipment from qualified Chinese suppliers based on exacting standards and product regulatory requirements. Suppliers have found China to be a good option for sourcing certain lower value-added finished goods for the U.S. market as well as materials and subcomponent parts necessary for final manufacturing of motor vehicle components and systems here in the U.S. In many cases, these factories in China are the only source for these parts and materials. This global model has allowed for continued growth in motor vehicle production as well as U.S. employment in our industry sector.

Approximately two-thirds of our members are small and medium businesses. Twenty-five percent tariffs on motor vehicle materials, subcomponents, and parts will cause disproportionate harm to these enterprises, disrupt American manufacturing operations, and increase costs. The increased costs resulting from the proposed tariffs will place a significant harmful burden on small- and medium-sized businesses, including the possibility of forced bankruptcy and loss of income. MEMA has been contacted by several Tier 2 and Tier 3 suppliers – often the major employer in small communities across the country – expressing their concerns about the large-scale 25 percent Tranche 3 and Tranche 4 tariffs moving profitable companies into the red and even posing existential threats to many.

## **B. COMMENTS ON TRANCHE 4 PROPOSALS**

MEMA has submitted comments to the USTR Section. 301 Committee regarding the previous three tranches, which are fully implemented imposing 25 percent tariffs on \$250 billion in imported goods. The fourth tranche being considered by USTR under its latest proposal encompasses a smaller list of vehicle and related materials goods than what was included in the third tranche. Nevertheless, our members have significant concerns with Tranche 4, which are detailed in Attachment 1. Below is a summary of these concerns.

- HTS codes for tubes, pipes and hoses of vulcanized rubber, semiconductor devices, various electrical apparatuses, various screws and bolts, aluminum plate, and lithium ion batteries are among the items flagged by our members as essential imports from China. As an example, one of our members noted the inclusion of lithium ion batteries (HTS Code 8507.60.00). This member company has invested heavily in the production of lithium ion batteries in the U.S. However, that business is still scaling up. In the interim, this company must source batteries from China, which is the only currently available source country. We request that the batteries be removed from List 4 to reduce direct costs to consumers. Products impacted include power tools, automobiles, and circuit boards.
- As another example, a small member company headquartered in Michigan testified before USTR last May regarding proposed tariffs on hinges covered by HTS Code 8302.10.30. Their

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<sup>3</sup> Source: U.S. Census, 2018 <https://www.census.gov/foreign-trade/Press-Release/2018pr/12/exh18.pdf>

testimony touched on the substantial economic impact that tariffs on these products would have on their small company and their ability to compete. USTR removed that HTS code from the list prior to tariffs going into effect. That product is now subject to tariffs under Tranche 4, creating the same potential economic harm to this small company. These products are not available from other sources.

### **C. COMMENTS ON TRANCHE 3 PROPOSALS**

Tranche 3 comprises a much larger list of motor vehicle part HTS codes and directly impacts hundreds of vehicle parts, tools and the manufacturing equipment and materials used to make them. We reiterate our concerns about this tranche and the increase from 10 percent to 25 percent tariffs on \$200 billion in imports. These are listed in Attachment 2. A wide variety of original equipment and aftermarket parts including, but not limited to, water pumps, fuel pumps, ignitions, camshafts, crankshafts, spark plugs, and lighting are included on USTR's proposed list. Tariffs on these products will directly impact consumers as they rely on these parts to repair and maintain their vehicles. The harm will increase significantly as the impact of the change from 10 percent to 25 percent tariffs becomes apparent.

Forcing manufacturers to make low technology products domestically would have significant unforeseen consequences on U.S. global competitiveness. These negative consequences impact companies of all sizes but are particularly burdensome on small- and medium-sized businesses.

### **D. USTR SHOULD CONSIDER ALTERNATIVES TO TARIFFS**

MEMA urges the administration to take an approach that specifically targets China's policies – particularly those that fail to adequately protect IPR – rather than imposing blanket tariffs on imports. Broad-based actions, such as tariffs, will not effectively eliminate the IPR and licensing issues in China. MEMA proposes the following alternative measures that will be more effective in protecting IPR and less harmful to U.S. interests:

- Elimination of equity restrictions and local partner or technology transfer requirements in the motor vehicle sector;
- Elimination of cybersecurity-related policies that limit data flows and prevent the successful and secure data flows into and out of China, which will limit exposure to hacking or surveillance; and,
- More robust measures to combat counterfeiting, including higher valuation of seized counterfeits based on the value of the genuine branded product.

### **E. SPECIFICS ON TRANCHE 4 AND TRANCHE 3**

Included in our comments are Attachments 1 and 2 that illustrate the HTS Codes about which our members are most concerned. We have included both lists to show the cumulative effect. Some goods are manufactured further in the U.S. and then either are sold to aftermarket distribution and retail channels for sale to consumers or used to support manufacturing in the original equipment vehicle industry. Others are imported as finished parts for use by the aftermarket industry to repair and maintain vehicles. Many of these products are inputs for suppliers to manufacture goods and are not advanced technologies linked to the "Made in China 2025" initiative or other Chinese advanced industrial policies.

The imposition of a 25 percent *ad valorem* duty on these products will be ineffective in eliminating China's discriminatory acts, policies, and practices. MEMA's members invest heavily in innovation and understand the importance of IPR protection to the sustained success of the motor vehicle parts manufacturing industry. While MEMA supports the administration's push for robust IPR protection in China, the proposed 25 percent *ad valorem* rate of duty on certain parts and equipment imported by vehicle suppliers from China is not the solution to these problems.

## F. CONCLUSION

MEMA urges USTR to reconsider tariffs on Chinese imports as they have already proven to have a significant adverse impact on U.S. vehicle parts suppliers. Tariffs will impact employment and growth, in turn, weakening the U.S. economy. Already the vehicle industry sector is past its 2016 peak in the business cycle, with sales and production flattening and trending downwards. These and other tariffs being contemplated, particularly the Section 232 automobile and automotive parts tariffs, could tip our sector and perhaps even the economy as a whole into recession. Consumers face significant cost increases for vehicle maintenance and repair if tariffs are imposed on these products. Tariffs on these goods will force consumers to pay more or forego necessary repairs and maintenance.

At the same time, motor vehicle component and systems manufacturers face significant cost increases as well. These will threaten the largest employers of manufacturing jobs in the United States. The proposed tariffs will cause job losses due to a decrease in production of necessary parts and equipment are not available in a timely manner or the costs of production increase. Increased production costs threaten small- and medium-sized U.S. businesses and their employees that depend on a reliable supply of automotive materials, subcomponents, and parts to make repairs to automobiles. Tariffs on these products could lead to downsizing, layoffs, or even cause certain U.S. production to move overseas.

By contrast, without the additional 25 percent tariffs, our member companies anticipate continued job growth in our industry for workers such as engineers, technicians, and skilled trades. Removal of the relevant motor vehicle materials, subcomponents, and parts from USTR's list will make U.S. manufacturers more competitive and create more American manufacturing jobs. Consistent with the stated goals of this administration, the USTR should therefore exclude imports of motor vehicle parts, materials, and equipment from the proposed list of products to be covered by the 25 percent tariff pursuant to Section 301.

For these reasons, MEMA respectfully requests USTR to remove the Tranche 4 products listed in Attachment 1 from its final determination list, particularly those goods that were previously exempted from Tranches 1 and 2. In addition, we ask the USTR to remove products listed in comments from individual vehicle component manufacturers and other vehicle industry stakeholders. In addition, MEMA urges the Administration to reconsider the 25 percent tariffs on the wide scope of Tranche 3 vehicle parts, components and materials listed in Attachment 2.

Our U.S. industry is reeling from the uncertainty caused by these tariffs. That uncertainty, coupled with increased costs and constrained access, could push away research and development and production of cutting-edge fuel efficiency, artificial intelligence, automated vehicle systems, vehicle communications technologies from the United States to our competitors. Rational, measured policies will keep vehicle suppliers' job creation and innovation in the United States.

Across the board tariffs on Chinese imports will drive away job creation and innovation from our shores.

Please contact me via email [awilson@mema.org](mailto:awilson@mema.org) or call 202-312-9246, if there is any additional information MEMA can provide.

Sincerely,

A handwritten signature in black ink that reads "Ann Wilson". The signature is written in a cursive, flowing style.

Ann Wilson  
Senior Vice President  
Government Affairs

*2 Attachments*

Attachment 1 – re: Tranche 4 HTS Codes	
3926.30.10	Handles and knobs for furniture, coachwork or the like, of plastics
3926.30.50	Other articles of plastics and articles of other materials of headings 3901 to 3914: fittings, handles and knobs
3926.90.10	Buckets and pails, of plastics, nesoi
3926.90.99	Other articles of plastic, nesoi
4009.12.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, not reinforced or combined w/other materials, with fittings
4009.42.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, reinforced or combined with other materials nesoi, with fittings
4016.99.15	Caps, lids, seals, stoppers and other closures, of noncellular vulcanized rubber other than hard rubber
4906.00.00	Plans and drawings for architectural, engineering, industrial, commercial, topographical or similar purposes, being originals drawn by hand; handwritten texts; photographic reproductions on sensitized paper and carbon copies of the foregoing
7224.10.00	Alloy (o/than stainless) steel, ingots and other primary forms
7318.16.00	Iron or steel, nuts; Other screws and bolts, whether or not with their nuts or washers: of stainless steel
7320.20.10	Iron or steel, helical springs, suitable for motor-vehicle suspension
7320.20.50	Iron or steel, helical springs (o/than suitable for motor-vehicle suspension)
7604.29.10	Aluminum alloy, profiles (o/than hollow profiles)
7606.11.60	Aluminum (o/than alloy), plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), clad
7606.12.30	Aluminum Plates Sheets A Strip Rect Inc Sq Alloy Not Clad With a Thickness Of 6.3mm or Less
7606.12.60	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), clad
7606.92.60	Other Aluminum Alloy Plates Sheets Others Clad Over 0.2mm but Under 6.3mm Thick
7607.11.60	Aluminum, foil, w/thickness over 0.01 mm but n/o 0.15 mm, rolled but not further worked, not backed
7607.11.90	Aluminum Foil of a thickness not exceeding 0.15mm, not backed, rolled but not further worked
7608.10.00	Aluminum Tubes and Pipes not seamless, not alloyed
7609.00.00	Aluminum Tube or Pipe Fittings (couplings, elbow sleeves)
8301.10.60	Padlocks, base metal, of cylinder or pin tumbler construction, not ov 3.8cm wide
8301.70.00	Base metal keys for padlocks, other locks, and clasps and frames with clasps incorporating locks
8302.10.30	Iron or steel, aluminum, or zinc hinges and base metal parts thereof, designed for motor vehicles
8305.20.00	Base metal staples in strips (e.g., for offices, upholstery, packaging)
8305.90.30	Base metal paper clips and base metal parts thereof
8415.90.40	Chassis, chassis bases and other outer cabinets for air conditioning machines

Attachment 1 – re: Tranche 4 HTS Codes	
8415.90.80	Parts for air conditioning machines, nesoi
8419.81.50	Machinery, plant or laboratory equipment, whether or not electrically heated (excluding furnaces, ovens and other equipment of heading 8514), for the treatment of materials by a process involving a change of temperature such as heating, cooking, roasting, distilling, rectifying, sterilizing, pasteurizing, steaming, drying, evaporating, vaporizing, condensing or cooling, other than machinery or plant of a kind used for domestic purposes; instantaneous or storage water heaters, nonelectric; parts thereof: Cooking stoves, ranges and ovens, Other
8435.90.00	Parts of presses, crushers and similar machinery used in the manufacture of wine, cider, fruit juices or similar beverages
8443.32.10	Printer units, capable of connecting to an automatic data processing machine or to a network
8467.22.00	Electromechanical saws for working in the hand, with self-contained electric motor
8467.89.50	Other tools for working in the hand, hydraulic or with self-contained nonelectric motor, other than suitable for metal working, nesoi
8471.30.01	Portable automatic data processing machines, not over 10 kg, consisting at least a central processing unit, keyboard and display
8471.41.01	ADP machines, nonportable or over 10 kg, comprise in the same housing least central processing unit and input & output unit
8471.49.00	ADP machines, nesoi, entered as a system (consisting of a central processing unit, an input unit, and an output unit)
8471.60.20	Keyboards for automatic data processing machines not entered with the rest of a system
8471.60.80	Optical scanners and magnetic ink recognition devices not entered with the rest of a ADP system
8479.90.85	Parts of trash compactors, nesoi
8481.90.10	Parts of hand operated and check appliances for pipes, boiler shells, tanks, vats or the like, of copper
8507.60.00	Lithium-ion batteries
8513.10.20	Flashlights
8517.62.0090	Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus:
8517.70.00	Parts of telephone sets; parts of other apparatus for the transmission or reception of voice, images or other data, including apparatus for
8518.10.80	Microphones and stands therefor, nesoi
8518.21.00	Single loudspeakers mounted in their enclosures
8518.29.80	Loudspeakers nesoi, not mounted in their enclosures, nesoi
8518.30.10	Line telephone handsets
8518.30.20	Headphones, earphones and combined microphone/speaker sets, other than telephone handsets
8523.49.50	Recorded optical media, nesoi

Attachment 1 – re: Tranche 4 HTS Codes	
8523.51.00	Solid-state Non-Volatile Storage Devices for the Recording of Sound or Other Phenomena
8525.50.10	Television transmission set top boxes which have a communication function
8525.80.40	Digital still image video cameras
8527.19.50	Reception apparatus for radiobroadcasting, whether or not combined, in the same housing, with sound recording or reproducing apparatus or a clock: Other; Other
8528.52.00	Other monitors capable of directly connecting to and designed for use with an automatic data processing machine of heading 8471
8528.59.25	Color video monitors w/flat panel screen, video display diagonal n/ov 34.29 cm, not incorporate VCR or player
8528.59.33	Lcd-type (direct View) Video Monitors, Color, with a Flat Panel Screen, with a Video Display Diagonal Gt 34.29
8528.69.60	Color video projectors nesoi, not incorporating a video recording or reproducing apparatus
8528.72.64	Color television reception apparatus w/flat panel screen, video display diagonal over 34.29 em, incorporating a VCR or player
8531.80.90	Electric sound or visual signaling apparatus, nesoi
8536.90.60	Battery clamps used in motor vehicles of headings 8702, 8703, 8704, or 8711
8539.22.80	Electrical filament lamps of a power not exceeding 200 W and for a voltage exceeding 100 V nesoi, excluding ultraviolet and infrared lamps
8539.29.30	Electrical filament lamps nesoi, designed for a voltage not exceeding 100 V, excluding ultraviolet and infrared lamps
9004.10.00	Sunglasses, corrective, protective or other
9006.99.00	Parts and accessories for photographic flashlight apparatus and flashbulbs
9007.91.40	Parts for cinematographic cameras
9008.50.10	Slide projectors
9013.80.90	Liquid crystal devices nesoi, and optical appliances and instruments, nesoi
9023.00.00	Instruments, apparatus and models, designed for demonstrational purposes, unsuitable for other uses, and parts and ac
9026.10.40	Flow meters, other than electrical, for measuring or checking the flow of liquids
9026.10.60	Instruments and apparatus for measuring or checking the level of liquids, other than flow meters, non-electrical
9026.20.80	Instruments and apparatus, other than electrical, for measuring or checking the pressure of liquids or gases
9026.80.60	Nonelectrical instruments and apparatus for measuring or checking variables of liquids or gases, nesi
9401.90.10	Parts of seats nesoi, for seats of a kind used for motor vehicles
9506.69.60	Noninflatable balls nesoi

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
2710.19.45	Mixture of hydrocarbons from petro oils & bitum. min. or preps.70%+ by wt. fr. petro.oils, nesoi, n/o 50% any single hydrocarbon
2818.30.00	Aluminum hydroxide
2823.00.00	Titanium Oxides
2850.00.50	Hydrides, nitrides, azides, silicides and borides other than of calcium, titanium, tungsten or vanadium
2925.29.18	N,N'-diphenylguanidine; 3-dimethylaminomethyleneiminophenol hydrochloride; 1,3-di-o-tolyguandidine; and one other specified chemical
2934.20.25	2-Amino-5,6-dichlorobenzothiazole; 2-amino-6-nitrobenzothiazole; and 2 other specified chemicals
2934.20.50	2-Amino-5,6-dichlorobenzothiazole; 2-amino-6-nitrobenzothiazole; and 2 other specified chemicals
2934.20.80	Other compounds containing a benzothiazole ring system (whether or not hydrogenated), not further fused
3506.10.50	Products suitable for use as glues or adhesives, nesoi, not exceeding 1 kg, put up for retail sale
3802.10.00	Activated carbon
3812.20.50	Compound plasticizers for rubber or plastics not containing any aromatic or modified aromatic plasticizer nesoi
3815.12.00	Supported catalysts with precious metal or precious metal compounds as the active substance
3815.19.00	Supported catalysts other than with nickel or precious metal or their compounds as the active substance
3824.99.39	Mixtures of two or more inorganic compounds, nesoi
3909.31.00	Poly (methylene phenyl isocyanate) (crude MDI, polymeric MDI)
3917.33.00	Flexible plastic tubes, pipes and hoses, nesoi, with fittings, not reinforced or otherwise combined with other materials
3917.39.00	Flexible plastic tubes, pipes and hoses, nesoi
3923.10.90	Other boxes, cases, crates and similar articles for the conveyance or packing of goods, of plastics
3923.21.00	Sacks and bags (including cones) for the conveyance or packing of goods, of polymers of ethylene
3923.29.00	Sacks and bags (including cones) for the conveyance or packing of goods, of plastics other than polymers of ethylene
3923.40.00	Spools, cops, bobbins and similar supports, of plastics
3923.50.00	Stoppers, lids, caps and other closures, of plastics
3923.90.00	Articles nesoi, for the conveyance or packing of goods, of plastics
3926.90.45	Gaskets, washers and other seals, of plastics
4001.29.00	Natural rubber in primary forms other than latex, smoked sheets or technically specified natural rubber (TSNR)
4003.00.00	Reclaimed rubber in primary forms or in plates, sheets or strip
4004.00.00	Waste, parings and scrap of rubber (other than hard rubber) and powders and granules obtained therefrom
4005.10.00	Rubber, unvulcanized, compounded with carbon black or silica, in primary forms or in plates, sheets or strip

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
4007.00.00	Vulcanized rubber thread and cord
4009.21.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, reinforced or combined only with metal, without fittings
4009.31.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, reinforced or combined only with textile materials, without fittings
4009.32.00	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, reinforced or combined only with textile materials, with fittings
4010.12.90	Conveyor belts or belting of vulcanized rubber reinforced only with textile materials, nesoi
4010.12.90	Conveyor belts or belting of vulcanized rubber reinforced only with textile materials, nesoi
4010.32.30	Transmission V-belts of vulcanized rubber, not V-ribbed, circumference exceed 60 cm but not exceed 180 cm, combined with textile materials
4010.32.60	Transmission V-belt of vulcanized rubber, not V-ribbed, circumference exceed 60 cm not exceed 180 cm, other than combined w/textile material
4010.33.60	Transmission V-belt of vulcanized rubber, V-ribbed, circumference exceed 180 cm not exceed 240 cm, other than combined w/textile material
4011.10.10	New pneumatic radial tires, of rubber, of a kind used on motor cars (including station wagons and racing cars)
4011.20.10	New pneumatic radial tires, of rubber, of a kind used on buses or trucks
4011.50.00	New pneumatic tires, of rubber, of a kind used on bicycles
4012.90.90	Interchangeable tire treads and tire flaps, of rubber other than natural rubber, except bicycle rim strips, nesoi
4013.20.00	Inner tubes of rubber, of a kind used on bicycles
4016.93.10	Gaskets, washers and other seals, of noncellular vulcanized rubber other than hardrubber, for use in automotive goods in C87
4016.93.50.	Gaskets, washers and other seals, of noncellular vulcanized rubber other than hard rubber, not for use in automotive goods in C87
4016.99.30	Articles made of noncellular vulcanized natural rubber, used as vibration control goods in vehicles of 8701 through 8705
4016.99.35	Articles made of noncellular vulcanized natural rubber, not used as vibration control goods in vehicles of 8701 through 8705 nesoi
4016.99.55	Articles nesoi, of noncellular vulcanized synthetic rubber other than hard rubber, used as vibration control goods in veh 8701/8705
4016.99.60	Articles of noncellular vulcanized synthetic rubber other than hard rubber
4017.00.00	Hard rubber (for example, ebonite) in all forms, including waste and scrap; articles of hard rubber
4202.92.91	Bags, cases and similar containers with outer surface of textile materials, of MMF except jewelry boxes
4819.10.00	Cartons, boxes and cases of corrugated paper or paperboard
4819.20.00	Folding cartons, boxes and cases of noncorrugated paper or paperboard
4819.50.40	Packing containers, nesoi, of paper, paperboard, cellulose wadding or webs of cellulose fibers
4820.10.20	Diaries, notebooks and address books, bound; letter and memorandum pads and similar articles, of paper or paperboard
4821.10.20	Paper and paperboard labels, printed in whole or part by a lithographic process
5402.19.30	Single high tenacity yarn of nylon or polyamides (except aramids), not put up for retail sale

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
5402.19.60	Multiple (folded) or cabled high tenacity yarn (except sewing thread) of nylon or other polyamides (except aramids), not put up for retail sale
5402.20.30	Single high tenacity yarn of polyesters, not put up for retail sale
5402.20.60	Multiple (folded) or cabled high tenacity yarn (except sewing thread) of polyesters, not put up for retail sale
5402.33.30	Single textured yarn of polyesters, not put up for retail sale
5402.33.60	Multiple or cabled textured yarn (except sewing thread), of polyesters, not put up for retail sale
5402.45.90	Syn filament yarn (not for doll wigs), of colored multifil, untwisted/with twist < 5 turns/meter, of nylon or o/polyamides, not retail sale
5402.47.90	Single yarn, twist of 0-50 turns/m, other than wholly of polyester, nesoi, not put up for retail sale
5402.48.00	Non-textured polypropylene yarns, monofil, untwisted or with a twist not exceeding 50 turns per meter, not for retail sale
5603.12.00	Nonwovens, of man-made filaments, weighing >25 but not >70 g/square m, whether or not impregnated, coated, covered or laminated
5603.13.00	Nonwovens, of man-made filaments, weighing >70 but not >150 g/square m, whether or not impregnated, coated, covered or laminated
5607.90.90	Twine, cordage, rope and cables, of materials nesoi
5806.10.24	Narrow woven pile fastener fabric tapes (other than goods of heading 5807) of man-made fibers
5903.90.25	Textile fabrics of man-made fibers, impregnated, coated, covered or laminated with plastics, nesoi, n/o 70% by weight rubber or plastics
5906.10.00	Rubberized textile fabric adhesive tape of a width not exceeding 20 cm (other than fabric of heading 5902)
5909.00.20	Textile hosepiping and similar textile tubing nesoi, with or without lining, armor or accessories of other materials
6909.12.00	Ceramic wares (o/than of porcelain or china) for laboratory, chemical or technical uses, w/hardness equivalent to 9 or more on Mohs scale
6909.19.50	Ceramic wares for laboratory, chemical or other technical uses (o/than of porcelain or china), nesoi
7307.19.90	Cast iron or steel, fittings for tubes or pipes, nesoi
7307.21.50	Stainless steel, not cast, flanges for tubes/pipes, not forged or forged and machined, tooled and otherwise processed after forging
7307.29.00	Stainless steel, not cast, fittings for tubes/pipes, nesoi
7307.91.30	Alloy steel (o/than stainless), not cast, flanges for tubes/pipes, forged, not machined/tooled and not otherwise processed after forging
7307.91.50	Iron or steel (o/than stainless), not cast, flanges for tubes/pipes, not forged or forged and machined, tooled & processed after forging
7307.92.30	Iron or steel (o/than stainless), not cast, threaded sleeves (couplings) for tubes/pipes
7307.99.50	Iron/steel (o/than stainless), n/cast, fittings for tubes/pipes, nesoi, not forged or forged and machined, tooled & processed after forging
7310.29.00	Iron/steel, cans for any material (o/compressed/liq. gas), n/closed by soldering or crimping, w/cap. less than 50 l

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
7310.29.00	Iron/steel, cans for any material (o/compressed/liq. gas), n/closed by soldering or crimping, w/cap. less than 50 l
7311.00.00	Iron/steel, containers for compressed or liquefied gas
7312.10.30	Iron or steel (o/than stainless), stranded wire, not elect. insul., not fitted with fittings or made up into articles
7315.11.00	Iron or steel, roller chain
7315.19.00	Iron or steel, parts of articulated link chain
7318.14.10	Iron or steel, self-tapping screws, w/shanks or threads less than 6 mm in diameter
7318.15.20	Iron or steel, bolts and bolts & their nuts or washers, imported in the same shipment
7318.15.40	Iron or steel, machine screws (o/than cap screws), 9.5 mm or more in length and 3.2 mm in diameter
7318.15.50	Iron or steel, threaded studs
7318.15.60	Iron or steel, screws and bolts, nesoi, having shanks or threads less than 6 mm in diameter
7318.15.80	Iron or steel, screws and bolts, nesoi, having shanks or threads 6 mm or more in diameter
7318.19.00	Iron or steel, threaded articles similar to screws, bolts, nuts, coach screws & screw hooks, nesoi
7318.22.00	Iron or steel, washers (o/than spring washers and other lock washers)
7318.23.00	Iron or steel, rivets
7318.24.00	Iron or steel, cotters and cotter pins
7318.29.00	Iron or steel, nonthreaded articles similar to rivets, cotters, cotter pins, washers and spring washers
7320.90.50	Iron or steel, springs (o/than leaf springs, helical springs or hairsprings)
7324.21.50	Cast iron, baths (whether or not enameled), not coated or plated with precious metal
7325.99.50	Steel, cast articles nesoi
7326.19.00	Iron or steel, articles forged or stamped but n/further worked, nesoi
7326.90.60	Iron or steel, articles nesoi, coated or plated with precious metal
7326.90.86	Iron or steel, articles, nesoi
7411.29.10	Copper alloys (o/than brass/cupro-nickel/nickel-silver), pipes and tubes, seamless
7412.20.00	Copper alloys, fittings for tubes and pipes
7415.33.80	Screws (other than wood screws), bolts (other than Muntz or yellow metal) and nuts, of copper, threaded, nesoi
7616.10.90	Aluminum, screws, bolts, nuts, screw hooks, washers and similar articles w/shanks, threads or holes 6 mm or less in diameter
7616.99.51	Aluminum, articles, nesoi
7907.00.60	Zinc, articles (o/than for household, table or kitchen use), nesoi
8203.20.40	Slip joint pliers
8203.20.60	Pliers (including cutting pliers but not slip joint pliers), pincers and similar tools
8205.20.30	Hammers and sledge hammers, with heads not over 1.5 kg each, and base metal parts thereof
8205.59.10	Pipe tools and base metal parts thereof
8205.59.55	Iron or steel handtools (o/ than household, o/than caulking guns) nesoi, and base metal parts thereof
8207.30.30	Interchangeable tools for pressing, stamping or punching, suitable for cutting metal, and base metal parts thereof

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
8207.30.60	Interchangeable tools for pressing, stamping or punching, not suitable for cutting metal, and base metal parts thereof
8207.90.45	Interchangeable tools, nesoi, suitable for cutting metal, nesoi and base metal parts thereof
8207.90.75	Interchangeable tools (o/than for handtools) nesoi, not suitable for cutting metal, nesoi and base metal parts thereof
8208.10.00	Knives and cutting blades for metal working machines or mechanical appliances, and base metal parts thereof
8302.10.60	Iron or steel, aluminum, or zinc hinges and base metal parts thereof, not designed for motor vehicles
8302.30.30	Iron or steel, aluminum or zinc mountings, fittings and similar articles nesoi, suitable for motor vehicles, and base metal parts thereof
8302.30.60	Base metal (o/than iron/steel/aluminum/zinc) mountings, fittings & similar articles, suitable for motor vehicles, & base metal pts thereof
8302.41.60	Iron or steel, aluminum or zinc mountings, fittings & similar articles, nesoi, suitable for buildings, & base metal pts thereof
8307.10.60	Iron or steel flexible tubing, without fittings
8407.33.60	Spark-ignition reciprocating piston engines, for other veh. of 8701.20, 8702, 8703 or 8704, cylinder cap. > 250 cc > or = 1, 000 cc, nesoi
8409.91.50	Parts nesoi, used solely or principally with spark-ignition internal-combustion piston engines for vehicles of head 8701.20, 8702-8704
8409.91.99	Parts nesoi, used solely or principally with spark-ignition internal-combustion piston engines of heading 8407, nesoi
8409.99.91	Parts nesoi, used solely or principally with the engines of heading 8408, for vehicles of heading 8701.20, 8702, 8703, 8704
8409.99.99	Parts nesoi, used solely or principally with compression-ignition internal-combustion piston engines of heading 8407 or 8408, nesoi
8412.90.90	Parts for engines of heading 8412 other than hydrojet engines for marine propulsion
8413.20.00	Hand pumps other than those of 8413.11 or 8413.19, not fitted with a measuring device
8413.30.10	Fuel-injection pumps for compression-ignition engines, not fitted with a measuring device
8413.30.90	Fuel, lubricating or cooling medium pumps for internal-combustion piston engines, not fitted with a measuring device, nesoi
8414.10.00	Vacuum pumps
8414.59.65	Other fans, nesoi
8414.90.10	Parts of fans (including blowers) and ventilating or recycling hoods
8415.20.00	Air conditioning machines of a kind used for persons, in motor vehicles
8418.99.80	Parts for refrigerators, freezers and other refrigerating or freezing equipment, electric or other, nesoi; parts for heat pumps, nesoi
8421.23.00	Oil or fuel filters for internal combustion engines
8423.81.00	Weighing machinery having a maximum weighing capacity not exceeding 30 kg
8425.42.00	Hydraulic jacks and hoists, nesoi
8425.49.00	Jacks and hoists of a kind used for raising vehicles, other than hydraulic, nesoi
8471.50.01	Processing units other than those of 8471.41 and 8471.49, nesoi
8471.60.10	Combined input/output units for automatic data processing machines not entered with the rest of a system

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
8471.60.90	Other input or output units of digital ADP machines, nesoi, not entered with the rest of a system
8471.80.10	Control or adapter units for automatic data processing machines not entered with rest of a system
8471.90.00	Magnetic or optical readers, nesoi; machines for transcribing data on data media in coded form and machines for processing such data, nesoi
8473.21.00	Parts and accessories of the electronic calculating machines of 8470.10, 8470.21 or 8470.29
8473.30.11	Printed circuit assemblies, not incorporating a cathode ray tube, of the machines of 8472
8479.89.94	Other machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84, nesoi
8480.79.90	Molds for rubber or plastics, other than injection or compression types, other than for shoe machinery
8481.80.90	Taps, cocks, valves & similar appliances for pipes, boiler shells, tanks, vats or the like, other than hand operated, nesoi
8482.10.10	Ball bearings with integral shafts
8483.10.10	Camshafts and crankshafts for use solely or principally with spark-ignition internal-combustion piston or rotary engines
8483.10.30	Camshafts and crankshafts nesoi
8483.10.50	Transmission shafts and cranks other than camshafts and crankshafts
8483.20.40	Housed bearings of the flange, take-up, cartridge and hanger unit type (incorporating ball or roller bearings)
8483.20.80	Housed bearings (incorporating ball or roller bearings), nesoi
8483.40.50	Fixed, multiple and variable ratio speed changers, not imported for use with machines for making cellulosic pulp, paper or paperboard
8483.90.50	Parts of gearing, gear boxes and other speed changers
8501.40.60	AC motors nesoi, single-phase, of 746 W or more
8504.10.00	Ballasts for discharge lamps or tubes
8504.31.40	Electrical transformers other than liquid dielectric, having a power handling capacity less than 1 kVA
8504.40.60	Power supplies suitable for physical incorporation into automatic data processing machines or units thereof of heading 8471
8504.40.70	Power supplies for automatic data processing machines or units thereof of heading 8471, nesoi
8504.40.85	Static converters (for example, rectifiers) for telecommunication apparatus
8504.40.95	Static converters (for example, rectifiers), nesoi
8504.50.80	Other inductors, nesoi
8505.11.00	Permanent magnets and articles intended to become permanent magnets after magnetization, of metal
8507.50.00	Nickel-metal hydride batteries
8508.70.00	Parts of vacuum cleaners
8511.10.00	Spark plugs
8511.30.00	Distributors and ignition coils
8511.40.00	Starter motors and dual purpose starter-generators

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
8511.50.00	Generators nesoi, of a kind used in conjunction with spark-ignition or compression-ignition internal-combustion engines
8511.80.60	Electrical ignition or starting equipment of a kind used for spark-ignition internal-combustion or compression-ignition engines, nesoi
8511.90.60	Parts nesoi of electrical ignition or starting equipment or generators used for spark- or compression-ignition internal-combustion engines
8512.20.20	Electrical lighting equipment of a kind used for motor vehicles or cycles other than bicycles
8512.20.40	Electrical visual signaling equipment of a kind used for motor vehicles or cycles other than bicycles
8512.90.20	Parts of electrical signaling equipment of a kind used for cycles or motor vehicles
8512.90.60	Parts of electrical lighting equipment of a kind used for motor vehicles or cycles other than bicycles
8512.90.90	Parts of windshield wipers of a kind used for motor vehicles or cycles
8516.29.00	Electric space heating apparatus and electric soil heating apparatus, other than storage heating radiators
8516.80.80	Electric heating resistors, nesoi
8517.62.00	Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus, nesoi
8517.69.00	"Other apparatus for transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless n"
8519.81.30	Sound reproducing apparatus nesoi, not incorporating a sound recording device
8525.80.30	Television cameras, nesoi
8527.21.40	Radiobroadcast receivers not operable w/o external power source, for motor veh., combined with sound recording/reproducing apparatus, nesoi
8527.29.40	Radiobroadcast receivers, not operating w/o external power, for motor vehicles, w/o sound recording or reproducing apparatus, FM or AM/FM
8527.29.80	Radiobroadcast receivers, not operating w/o external power, for motor vehicles, w/o sound recording or reproducing apparatus, other
8528.59.05	Incomplete or unfinished color video monitors, w/o cathode-ray tube, flat panel screen or similar display device, incorp. VCR or player
8529.90.86	Parts suitable for use solely or principally with the apparatus of 8525 and 8527 (except television apparatus or cellular phones), nesoi
8531.20.00	Indicator panels incorporating liquid crystal devices (LCD's) or light emitting diodes (LED's)
8531.90.90	Parts of electric sound or visual signaling apparatus, nesoi
8534.00.00	Printed circuits, without elements (other than connecting elements) fitted thereon
8536.61.00	Lampholders for a voltage not exceeding 1,000 V
8536.69.80	Plugs and sockets for making connections to or in electrical circuits, for a voltage not exceeding 1,000 V, nesoi
8537.10.91	Other boards, panels, consoles, desks, cabinets, etc., equipped with apparatus for electric control, for a voltage not exceeding 1,000, nesoi
8538.90.10	Printed circuit assemblies of an article of heading 8537 for one of the articles described in additional U.S. note 12 to chapter 85
8539.10.00	Sealed beam lamp units
8543.70.71	Electric luminescent lamps

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
8543.90.88	Parts (other than printed circuit assemblies) of electrical machines and apparatus, having individual functions, nesoi
8544.20.00	Insulated (including enameled or anodized) coaxial cable and other coaxial conductors
8544.42.20	Insulated electric conductors nesoi, used for telecommunications, for a voltage not exceeding 1,000 V, fitted with connectors
8544.42.90	Insulated electric conductors nesoi, for a voltage not exceeding 1,000 V, fitted with connectors, nesoi
8545.20.00	Carbon brushes of a kind used for electrical purposes
8546.90.00	Electrical insulators of any material, other than glass or ceramics
8547.20.00	Insulating fittings for electrical machines, appliances or equipment, of plastics
8548.90.01	Electrical parts of machinery or apparatus not specified or included elsewhere in chapter 85
8708.29.50	Pts & access of bodies for mtr vehicles of headings 8701 to 8705, nesoi
8708.40.11	Pts. & access. of mtr. vehic. of 8701.20, 8702, 8703 or 8704, gear boxes
8708.40.75	Pts & access of motor vehicles of 8701, nesoi, and 8702-8705, pts for gear boxes, nesoi
8708.50.91	Pts. & access. of mtr. vehic. of 8701, nesoi, 8702 and 8704-8705, parts of non-driving axles
8708.80.13	Pts & access of mtr vehic of 8701, nesoi, and of 8702-8705, McPherson struts
8708.80.16	Pts & access of mtr vehic of 8701, nesoi, and of 8702-8705, suspension shock absorbers (o/than McPherson struts)
8708.80.55	Pts & access of tractors (o/than road tractors or for agricultural use), pts for suspension systems nesoi
8708.80.65	Pts & access of motor vehicles of 8701, nesoi, and 8702-8705, pts for suspension systems nesoi
8708.91.50	Pts & access of mtr vehic of 8701, nesoi, and 8702-8705, radiators
8708.91.75	Pts & access, nesoi, of motor vehicles of 8701, nesoi, and 8702-8705, parts of radiators, nesoi
8708.92.50	Pts & access of mtr vehic of 8701, nesoi, and 8702-8705, mufflers & exhaust pipes
8708.92.75	Pts & access, nesoi, of motor vehicles of 8701, nesoi, and 8702-8705, parts of mufflers, nesoi
8708.93.75	Pts. & access. of mtr. vehic. of 8701, nesoi, and 8702-8705, pts. of clutches
8708.94.50	Pts. & access. of mtr. vehic. of 8701, nesoi, and 8702-8705, steering wheels, steering columns and steering boxes
8708.94.75	Pts. & access., nesoi, of motor vehicles of 8701, nesoi, and 8702-8705, parts of steering wheels/columns/boxes, nesoi
8708.99.53	Parts & accessories of motor vehicles of 8701-8705, nesoi, of cast iron
8708.99.55	Pts & access of motor vehicles of 8701, nesoi, and 8702-8705, vibration control goods containing rubber
8708.99.58	Pts. & access. of motor vehicles of 8701, nesoi, and 8702-8705, double flanged wheel hub units w/ball bearings
8708.99.68	Pts. & access. of motor vehicles of 8701, nesoi, and 8702-8705, pts. for power trains nesoi
8708.99.81	Pts & access, nesoi, of motor vehicles of 8701, nesoi, and 8702-8705
8716.80.50	Vehicles, not mechanically propelled, nesoi
9002.11.90	Objective lenses and parts & access thereof, for cameras, projectors, or photographic enlargers or reducers, except projection, nesoi

<b>Attachment 2 – re: Tranche 3 HTS Codes</b>	
9013.80.90	Liquid crystal devices nesoi, and optical appliances and instruments, nesoi
9013.90.80	Parts and accessories of liquid crystal devices nesoi, and optical appliances and instruments, nesoi
9015.10.40	Electrical rangefinders
9015.90.01	Parts and accessories of 9015
9017.30.40	Micrometers and calipers, for use in the hand
9017.30.80	Gauges for measuring length, for use in the hand
9017.80.00	Instruments for measuring length, for use in the hand, nesoi (for example, measuring rods and tapes)
9025.90.06	Other parts & accessories of hydrometers & like floating instruments, thermometers, pyrometers, barometers, hygrometers, psychrometers & combinations
9029.20.60	Stroboscopes
9030.20.10	Oscilloscopes and oscillographs, nesoi
9401.20.00	Seats, of a kind used for motor vehicles
9405.40.84	Electric lamps and lighting fixtures nesoi, not of base metal
9405.50.40	Non-electrical lamps and lighting fixtures nesoi, not of brass
9405.92.00	Parts of lamps, lighting fixtures, illuminated signs & the like, of plastics

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