



September 6, 2018

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The Honorable Robert E. Lighthizer
U.S. Trade Representative
Office of the U.S. Trade Representative
600 17th Street, N.W., Room F516
Washington, D.C. 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-2018-0026]**

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). The USTR initially proposed a 10 percent *ad valorem* rate of duty on certain vehicle materials, subcomponents, and parts imported by vehicle parts manufacturers from the People's Republic of China on \$200 billion worth of goods.¹ After the initial proposal, USTR was directed by the president to investigate the impact of a tariff as high as 25 percent and announced an extension of the comment period.²

Tariffs on the motor vehicle materials and products included on the USTR's proposed list 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. Motor vehicle component and system manufacturers will also face significant cost increases. The increased costs due to tariffs will threaten the success of small- and medium-size 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.

While MEMA applauds the administration's efforts to protect intellectual property rights ("IPR"), MEMA respectfully requests that these products addressed in our comments be removed from USTR's proposal. Ultimately tariffs on these products will hurt consumers, domestic manufacturers and the economy.

A. INTRODUCTION

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

¹ 83 Fed. Reg. at 33608

² 83 Fed. Reg. at 38760



commercial vehicles.³ 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.

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 77 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; many U.S. motor vehicle suppliers have manufacturing facilities in China to service Asia and the global marketplace. Our members range in size from large, multi-national corporations to small- and medium-sized enterprises.

MEMA members 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 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.

B. COMMENTS ON PROPOSAL

MEMA has submitted comments to the USTR Sec. 301 Committee regarding the previous two tranches imposing 25 percent tariffs on \$50 billion in imported goods. The third tranche being considered by USTR under its latest proposal encompasses a considerably larger list of HTS codes and will directly impact hundreds of finished and semi-finished vehicle parts, tools and the manufacturing equipment and materials used to make them.

Most notable are finished vehicle parts under HTS 8708 as well as dozens of other finished vehicle parts that fall outside of HTS Chapter 87. The latest proposal also encompasses a wide range of critical materials – some of which have limited or no sourcing options outside of China – that are used by U.S. parts manufacturers to make finished components. Goods under several HTS Chapters,⁴ in many cases, are semi-finished or finished parts ultimately sold for use in the vehicle aftermarket industry. Additionally, other products are materials or parts assembled or manufactured further to produce vehicle components. In other instances, these products are tools and equipment relied on by motor vehicle suppliers for use on the manufacturing production line. MEMA urges USTR to remove the products listed on our **Attachment 1** from the tariff proposal.

USTR has asked for comments on whether imposing tariffs are practicable or effective to obtain the elimination of China's acts, policies, and practices. Additionally, USTR asked for feedback on the

³ 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).

⁴ Specific HTS Chapters include 27, 28, 29, 35, 38, 39, 40, 42, 48, 54, 56, 58, 59, 69, 73, 74, 76, 79, 82, 83, 84, 85, 87, 90 and 94.

impact maintaining or imposing additional duties on products would cause disproportionate economic harm to U.S. interests, including small- or medium-size businesses and consumers. As outlined below, putting tariffs into place on the finished vehicle parts on the proposed list will directly harm consumers because many of these products are sold in the aftermarket for the repair and maintenance of vehicles. Moreover, the products subject to this action are not related to China's advanced industrial policies such as "Made in China 2025." Thus, the implementation of tariffs on these products will do little to impact Chinese technology transfer and other IPR policies.

1) Broad Tariffs Will Harm Consumers

Much of MEMA's opposition to the previous rounds of tariffs on Chinese products focused on the damage to U.S. businesses. In this round, the motor vehicle products under consideration for tariffs will have a disproportionate and significant harmful impact on the U.S. consumer. Many of the finished and semi-finished vehicle parts under consideration are either further manufactured into aftermarket parts or imported as finished goods. These are then directly sold to aftermarket distributors and retailers. The vehicle aftermarket provides finished components via a variety of channels either directly to consumers or to vehicle service technicians and repair facilities. These goods are used for the maintenance and repair of over 260 million passenger cars, trucks, and buses on our nation's roadways. Consumers rely on these parts and subcomponents to keep their vehicles safely and properly maintained for on-road use. A 25 percent tariff on these parts will be passed downstream to consumers and service facilities. This harms consumers who rely on affordable and convenient service options to maintain their vehicles. Imposing tariffs on consumers will serve as an additional tax on Americans.

Consumers rely on affordable components, parts, and systems to repair their vehicles. The list of products includes a number of finished parts that consumers need to maintain their vehicles. For example, a major aftermarket manufacturer shared with MEMA that they import products from around 100 HTS codes listed in the USTR proposal. Within these codes, they manufacture and distribute many thousands of separate stock keeping units (SKUs) to be sold to consumers. If a 25 percent tariff is imposed on these imports, it will cost this company millions of dollars in the first year. They anticipate that these costs will be passed onto retailers and repair shops who will, in turn, pass on their increased costs to consumers relying on these products.

Other aftermarket suppliers report similar impacts. A wide variety of 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 repair and maintain their vehicles. Given the significant impact this will have on consumers, we urge you to not move forward with tariffs on the products included in **Attachment 1**.

2) Broad Tariffs Will Harm Small and Medium Businesses

A significant portion of the motor vehicle supplier industry is made up of small and medium businesses. The proposed 25 percent tariffs on motor vehicle materials, subcomponents, and parts will cause disproportionate harm to these businesses, 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.

For example, a small OE supplier imports both high-tech components only available in China, as well as low-tech components. These components are subject to the proposed tariffs. The imported components are used in the assemblies produced by this company in the United States as well as at their assembly plants in China, which serve the Chinese automobile market. Importing the components from its own manufacturing facility in China for North American production allows this company to be globally competitive and focus on continued U.S. investments in technological innovation and invention, which they have been doing for years. If this company were forced to bring all component sourcing and manufacturing to the U.S., their ability to invest in new technology and innovation in the United States would be significantly diminished, and their global competitiveness greatly or fatally impaired.

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.

3) Broad Tariffs Will Not Lead to Different Sourcing

Motor vehicle suppliers and the industry have invested significant resources into a complex, integrated global supply chain. It is important that the supply chain meets the cost, quality, safety, compliance, and certification requirements for both new vehicle and aftermarket applications. In most cases, it takes years to confirm and verify that a manufacturer within the supply chain meets these requirements and has the capacity to meet the downstream demands. A motor vehicle supplier importing into the U.S. is unable to easily switch suppliers that meet all requirements of the downstream users because of time, financial and capacity constraints, and the complexity of the supply chain. Instead, member companies have shared with MEMA that they will be forced to pay any tariffs put into place and then pass those increased costs along to their vehicle manufacturer customers and to consumers through increased costs of new vehicles or increased costs for the parts needed to repair and maintain existing vehicles.

4) Tariffs Are Being Proposed on Products and Materials with Limited or No Other Sourcing

Many of the products or materials USTR recommended to be subject to tariffs are not available in sufficient capacity from other sources. This leaves manufacturers with no choice but to import the necessary materials and subcomponents to meet their customers' needs in both the new vehicle and aftermarket industries.

For example, a large privately-owned Tier One supplier imports sintered neodymium-iron-boron magnets for use in electromagnetic clutches. These magnets are included under HTS code 8505.11.00 and are only available from China, which has invested in the mining of rare earth minerals. These minerals are used to create magnets amongst other things. The U.S. no longer operates the mines with the materials used in these magnets and looks to China to supply the world. At this time, sourcing from another country is not a viable option. It would take many years and investments from a variety of industries for other sources to be developed.

5) Imposing Duties on These Products Is Not Practicable or Effective to Obtain the Elimination of China's Acts, Policies, and Practices

The products listed in **Attachment 1** are imported by MEMA members. Some are manufactured further and then are either sold to aftermarket distribution and retail channels for sale to consumers or used to support downstream 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.

6) Tariffs on Specific Products Will Help Certain Sectors of the Supplier Industry

While tariffs on the products under consideration will not address China’s industrial policies related to IPR theft and forced technology transfer, tariffs on specific products would be a benefit to certain sectors of the supplier industry that have been harmed by low-cost imports from China. The U.S. brake industry has been adversely impacted by efforts of Chinese competitors that sell brake rotors and friction materials into the U.S. below cost. These tactics have effectively stopped U.S. production of rotors in the last two decades. U.S. brake friction material producers are now facing similar threats from imported friction material from China.

In these cases, The U.S. brake manufacturing industry applauds the administration’s efforts. However, this industry is facing threats from countries outside of China. Given the global nature of low-cost imports, MEMA urges USTR and the administration to pursue other avenues to protect this important industry from unfair trading practices. The administration should use other tools such as antidumping and countervailing duty investigations. A list of specific products being harmed by imports are included in **Attachment 2**.

7) 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.

As stated earlier, the products in **Attachment 1** that MEMA is asking USTR to remove from its proposed list are not advanced technologies at risk for IPR theft in China. Instead, these are materials or products that are used by suppliers to manufacture standard components and materials for motor vehicle manufacturers and for consumers in the aftermarket.

D. CONCLUSION

MEMA urges USTR to reconsider tariffs as they will have a significant negative impact on consumers and U.S. vehicle parts suppliers. Tariffs will impact employment and growth, in turn, weakening the U.S. economy. 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 if necessary parts and equipment are not available in a timely manner or the costs of production increase. Increased production costs threaten small- and medium-size 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 products listed in **Attachment 1** from its final determination list, in addition to those products listed in comments from individual vehicle component manufacturers and other vehicle industry stakeholders. As stated above, the products in **Attachment 1** are not products within the scope of China's advanced industrial initiatives and are not advanced technologies at risk for technology theft and IPR infringement in China.

Please contact me via email 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 of Government Affairs

Attachment 1	
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
4007.00.00	Vulcanized rubber thread and cord

Attachment 1	
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
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

Attachment 1	
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
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

Attachment 1	
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
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

Attachment 1	
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
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

Attachment 1	
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
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

Attachment 1	
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
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

Attachment 1	
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
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)

Attachment 1	
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

Attachment 2	
6813.20.00	Friction material & articles thereof, containing asbestos
6813.81.00	Brake linings and pads not containing asbestos
6813.89.00	Friction material & articles thereof with a basis of minerals substances (other than asbestos) or of cellulose, nesoi
8708.30.10	Pts. & Access. Of tractors suit. For agric. Use, brakes and servo-brakes & pts therof