



May 11, 2018

**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, D.C., 20508

**Re: Request for Comment; Proposed Determination of Action Pursuant to  
Section 301 (Docket No. USTR-2018-0005)**

Dear Ambassador Lighthizer:

The Motor & Equipment Manufacturers Association (MEMA) respectfully submits these written comments to the *Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*<sup>1</sup> ("Section 301 Determination"), issued by the Office of the United States Trade Representative ("USTR") in the above-referenced proceeding. The USTR has proposed a 25 percent *ad valorem* rate of duty on certain vehicle materials, subcomponents, and parts imported by our members from the People's Republic of China including, but not limited to, certain products in HTS Chapters 40, 73, 76, 83, 84, 85, 90, and 94.<sup>2</sup> Despite not being included in the HTS subheading 8708 for motor vehicle parts, the machinery and/or products listed are used in the motor vehicle supplier industry as part of the manufacturing production line or as material to produce the vehicle parts.

There is no indication that the USTR intended for motor vehicle parts to be subject to the Section 301 tariffs and, as detailed below, tariffs on these products will disproportionately harm U.S. businesses, including the vehicle components and systems manufacturers MEMA represents. Though MEMA applauds the administration's efforts to protect intellectual property rights ("IPR"), MEMA respectfully requests that these inadvertently included products be removed from the USTR's proposed list of products subject to 25 percent *ad valorem* duties pursuant to Section 301. Ultimately inclusion of these products will hurt domestic manufacturers and consumers.

**A. MEMA**

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 heavy trucks.<sup>3</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.

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

<sup>1</sup> 83 *Fed. Reg.* at 14906, April 6, 2018

<sup>2</sup> The full list of HTS Codes MEMA is requesting be removed from USTR's list is included at **Attachment 1**.

<sup>3</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).



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 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 parts necessary for manufacturing motor vehicle components and systems. This model has allowed for continued growth in motor vehicle production as well as U.S. employment in our industry sector.

## **B. CRITERIA UNDER REVIEW**

Pursuant to the instructions in the Section 301 Determination, MEMA provides the following information to the USTR in support of the proposed determination's request for comments.<sup>4</sup> Analysis of these factors, collectively and individually, demonstrates that imports of certain vehicle parts and equipment should be excluded from the proposed list of products that are subject to 25 percent additional tariffs pursuant to Section 301.<sup>5</sup>

### **1) The specific products to be subject to increased duties, including whether products listed in the Annex should be retained or removed;**

MEMA requests that USTR remove the HTS subheadings included in **Attachment 1** from its proposed determination list of Section 301 tariffs. The Attachment represents input from many MEMA members; however, it is by no means an exhaustive list. MEMA anticipates many individual vehicle parts manufacturer companies and other vehicle industry stakeholders will ask the USTR to remove other HTS subheadings that are related to the materials, vehicle components, and manufacturing tooling they need to manufacture vehicle parts. Parts and materials that fall under the HTS chapters we noted earlier (40, 73, 76, 83, 84, 85, 90, and 94) and are included in the Attachment.

The products listed in Attachment 1 are imported by our members, 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. As previously noted, MEMA believes that these motor vehicle parts were inadvertently included on the USTR's list because they are not imported HTS subheading 8708, which covers motor vehicle parts. While many of the parts and subcomponents listed in Attachment 1 are not typically the IPR-focused innovative technologies that suppliers and vehicle manufacturers rely on for advanced vehicles (such as advanced vehicle safety or fuel efficiency technologies) these parts and components are important to both the vehicle manufacturers and consumers. Vehicle manufacturers require a reliable supply chain to source the thousands of parts, components, and

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<sup>4</sup> See 83 *Fed. Reg.* at 14908 (Sec. E)

<sup>5</sup> See Attachment 1

systems that are ultimately assembled into a finished vehicle. Tariffs on these parts will cause uncertainty, price increases, and potential delays across the vehicle manufacturing supply chain. Consumers who rely on affordable service parts to properly maintain the millions of vehicles on our nation's roadways will be negatively impacted by increased prices as well.

There is no evidence that applying tariffs to these products will address any of the concerns that China misappropriated intellectual property, and therefore MEMA believes that these products should be excluded from USTR's list.

**2) The level of the increase, if any, in the rate of duty;**

The USTR has indicated that a 25 percent tariff will be imposed on certain motor vehicle materials, subcomponents, and parts in HTS Chapters 40, 73, 76, 83, 84, 85, 90, and 94. While complete motor vehicle parts as defined under HTS 8708 are not included in the current proposed list, many of the materials, subcomponents, and parts that suppliers rely on to make finished parts, components, and systems are included. The 25 percent increase is substantial, and in most – if not all – cases, will be passed onto U.S. consumers through higher prices for the final product. Vehicle manufacturers use these products as OE components and systems for new vehicles. Consumers use these automotive aftermarket products to repair, maintain, or improve their vehicles.

Several of the listed products are important components necessary for the safe operation and function of a vehicle and/or are components of vehicle safety-related systems. For example, wire harnesses and electric switches are necessary to power and control a variety of systems on a vehicle, including vehicle lighting, sensors and door locks. Seating components provide important occupant protection and comfort. Motor protectors prevent engine-related malfunctions and fires. Sensors monitor and regulate instruments to control fluid and heat pressures, to prevent overheating, and protect against breakdowns during operation. Stainless steel circular pipes are necessary to produce exhaust pipes to reduce emissions. Camera lenses are used in rearview cameras, which are required safety equipment.

A 25 percent tariff on these materials, subcomponents, and parts will adversely impact suppliers by disrupting their U.S. manufacturing operations and increasing costs. Thus, the 25 percent additional tariffs pursuant to Section 301 would likely eliminate available sources for certain vehicle parts and equipment, cause harm to U.S. manufacturers, and increase costs to consumers that depend on a reliable and affordable supply for these vehicle parts and equipment. Small- and medium-sized U.S. motor vehicle parts manufacturers are particularly susceptible to increased costs, squeezed margins, and added burdens, placing them at a competitive disadvantage to larger corporations and/or foreign competitors.

Moreover, often there are capacity challenges and sourcing these products in the volumes some suppliers require is simply not available domestically. Capacity utilization in the U.S. is strained or non-existent for many of the products needed by suppliers on the list, which is why China is often the only sourcing choice for manufacturers. Lack of capacity is a serious consequence of these tariffs, which would hinder the ability of suppliers to manufacture the volumes necessary for OEM customers or U.S. consumers.

**3) The appropriate aggregate level of trade to be covered by additional duties;**

The USTR's proposed list of products covers approximately \$50 billion in estimated annual trade value for 2018. As addressed below, MEMA does not agree that the imposition of tariffs is an

effective or viable solution to the China's intellectual property and licensing issues. If tariffs are imposed, however, MEMA contends that they should be specifically focused on products benefitting from the restrictive and discriminatory intellectual property and licensing practices that the administration is attempting to eliminate.

The USTR did not include – nor should it include – complete motor vehicle parts as defined under HTS 8708 within the scope of the proposed tariffs, which demonstrates the USTR's intention not to include motor vehicle parts of any kind. The products that MEMA is requesting be removed from USTR's list have been produced for several years and are sold to consumers or used by downstream U.S. manufacturing operations in the vehicle industry. There is no indication that USTR intended for these parts to be subject to the Section 301 tariffs. Therefore, they should be excluded from the proposed list.

**4) Whether imposing increased duties on a particular product would be practicable or effective to obtain the elimination of China's acts, policies, and practices;**

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. Though 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 our members from China is not the solution to these problems.

As previously noted, MEMA member companies operate in a global supply chain and many U.S. motor vehicle suppliers either have manufacturing facilities in China or source inputs from Chinese producers. A 25 percent tariff on the materials, subcomponents, and parts at issue will undoubtedly harm MEMA member companies by disrupting their U.S. manufacturing operations and increasing costs. Moreover, 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. These risks are particularly acute for small- and medium-sized businesses.

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 like this 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.

In its efforts to protect intellectual property laws and eliminate China's restrictive and discriminatory licensing requirements, we urge the administration to consider the physical presence of many U.S.-based suppliers in China and the downstream manufacturers that rely on a

high-quality, reliable, and affordable supply of these materials, subcomponents, and parts to support their business in the United States. Unless these companies notify the U.S. government that they had a problem with China's acts, policies, and practices related to technology transfer, IP, and innovation, it is not appropriate for the U.S. government to require additional tariffs on their products.

**5) Whether maintaining or imposing additional duties on a particular product would cause disproportionate economic harm to U.S. interests, including small- or medium-size businesses and consumers.**

The proposed 25 percent tariffs on motor vehicle materials, subcomponents, and parts will cause disproportionate harm to U.S. interests by disrupting American manufacturing operations and increasing costs, both to U.S. producers and consumers. 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.

Original equipment suppliers facing increased costs have two options – pass the price increases on to the vehicle manufacturer customer or absorb the price increase, possibly limiting future investments. Passing on the costs is not possible because the OEM customer would seek other suppliers – potentially overseas. If the supplier absorbs the costs, they may be forced to delay or cancel planned U.S. investments, such as workforce training or facility expansion. Either choice results in financial losses to the supplier, impacting their U.S. workers.

Additionally, 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 harm consumers who desire affordable and convenient service to maintain the millions of vehicles on the road today, keeping them operating safely, appropriately, and efficiently.

Motor vehicle component and systems manufacturers are 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 parts and equipment from the proposed list of products to be covered by the 25 percent tariff pursuant to Section 301.

Another serious concern is the additive nature of these tariffs, which will be on top of existing tariffs or duties on products. MEMA members have identified several products on USTR's proposed list that are also subject to tariffs under the Section 232 investigation. As MEMA has shared with USTR, the Department of Commerce, and Congress, suppliers support and rely on a strong domestic steel and aluminum industry to provide a wide range of raw and semi-finished materials to

manufacture motor vehicle components and systems in the United States. Many of these specialty steel and aluminum materials are used in a number of vehicle components. Usually these materials are either not manufactured in the U.S. or are not available in the volumes suppliers require. In fact, for some materials, there are few steel and aluminum producers in the world – in some cases only one or two – that can source the grade and quantity of specialty materials needed to meet the component specifications.

If these specialty materials remain on USTR's proposed list, suppliers who rely on those products would have to pay two separate tariffs, which would distort market access and impede suppliers' ability to source the materials necessary to make critical component parts. MEMA urges the removal of these products from the Section 301 proposed list due to limited U.S. supply.

### C. CONCLUSION

For the reasons set forth above, MEMA respectfully requests USTR to remove the products listed in **Attachment 1** from the Annex, in addition to those listed in comments from vehicle component manufacturers and other vehicle industry stakeholders. Certain automotive materials, subcomponents, and parts imported from China should not be subject to the proposed tariffs pursuant to the Section 301 action. 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 blue ink that reads "Ann Wilson". The signature is written in a cursive, flowing style.

Ann Wilson  
Senior Vice President of Government Affairs

**ATTACHMENT 1**

\*Products noted with an asterisk are also included in the Section 232 investigation tariffs

<b>HTSCode</b>	<b>Description</b>
39269090	Other articles of plastics and articles of other materials of headings Nos. 39.02 to 39.14
40091200	Tubes, pipes and hoses of vulcanized rubber other than hard rubber, not reinforced or combined w/other materials, with fittings
40169915	Caps, lids, seals, stoppers and other closures, of noncellular vulcanized rubber other than hard rubber
73064050*	Stainless steel, welded, w/circ. x-sect & ext. diam. 406.4mm or less, tubes, pipes, hollow profiles, w/wall thick. of 1.65 mm or more
73181600	Iron or steel, nuts
73202010	Iron or steel, helical springs, suitable for motor-vehicle suspension
73202050	Iron or steel, helical springs (a/than suitable for motor-vehicle suspension)
76061230*	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), not clad
76061260*	Aluminum alloy, plates/sheets/strip, w/thick. o/0.2mm, rectangular (incl. sq), clad
76071960*	Aluminum, foil nesoi, w/thickness o/0.15mm but n/o 0.2 mm or 0.15mm or less & not cut to shape, not rolled, not backed, nesoi
76082000*	Aluminum alloy, tubes and pipes
76090000*	Aluminum, fittings for tubes and pipes
83021030	Iron or steel, aluminum, or zinc hinges and base metal parts thereof, designed for motor vehicles
84123900	Pneumatic power engines and motors, other than linear acting
84135000	Reciprocating positive displacement pumps for liquids, not fitted with a measuring device, nesi
84136000	Rotary positive displacement pumps for liquids, not fitted with a measuring device, nesi
84138100	Pumps for liquids, not fitted with a measuring device, nesi
84139110	Parts of fuel-injection pumps for compression-ignition engines
84139190	Parts of pumps, nesi
84143040	Compressors of a kind used in refrigerating equipment (including air conditioning) not exceeding 1/4 horsepower
84143080	Compressors of a kind used in refrigerating equipment (incl. air conditioning) exceeding 1/4 horsepower
84145965	Air or vacuum pumps, air or other gas compressors and fans; ventilating or recycling hoods incorporating a fan, whether or not fitted with filters
84148005	Turbocharger and supercharger air compressors
84148020	Gas compressors, nesi
84149041	Parts of air or gas compressors, nesoi

84149090	Parts of air or vacuum pumps and ventilating or recycling hoods
84159040	Chassis, chassis bases and other outer cabinets for air conditioning machines
84159080	Parts for air conditioning machines, nesi
84171000	Furnaces and ovens for the roasting, melting or other heat treatment of ores, pyrites or of metals
84195010	Brazed aluminum plate-fin heat exchangers
84195050	Heat exchange units, nesoi
84199030	Parts of heat exchange units
84212900	Filtering or purifying machinery and apparatus for liquids, nesi
84213940	Catalytic converters
84213980	Filtering or purifying machinery and apparatus for gases, other than intake air filters for internal combustion engines or catalytic convo
84219900	Parts for filtering or purifying machinery or apparatus for liquids or gases
84229091	Parts of packing or wrapping machinery, nesoi
84253901	Winches nesi, and capstans, not powered by electric motor
84311000	Parts suitable for use solely or principally with the machinery of heading 8425
84312000	Parts suitable for use solely or principally with machinery of heading 8427 (fork lift trucks, other work truck fitted with lifting and handling equipment)
84313900	Parts suitable for use solely or principally with the machinery of heading 8428, nesi
84314990	Parts suitable for use solely or principally with the machinery of heading 8429 or 8430, nesi
84419000	Parts for machinery used in making up paper pulp, paper or paperboard, including cutting machines
84553000	Rolls for metal-rolling mills
84559080	Parts for metal-rolling mills, other than rolls, nesi
84622100	Machine tools for working metal by forging, hammering or die-stamping; machine tools for working metal; presses for working metal:
84622900	Bending, folding, straightening or flattening machines (including presses) not
84669398	Other parts and accessories for machines of heading 8456 to 8461, nesoi
84669485	Other parts and accessories for machines of heading 8462 or 8463, nesoi
84716080	Optical scanners and magnetic ink recognition device
84717040	ADP magnetic disk drive storage units, disk dia. n/ov 21 cm, not in cabinet, w/o attached external power supply, n/entered w/rest of a system
84733020	Parts and accessories of the ADP machines of heading 8471, not incorporating a CRT, parts and accessories of printed circuit assemblie
84771090	Injection molding machines of a type used for working or manufacturing products from rubber or plastics, nesoi

84775100	Machinery for molding or retreading pneumatic tires or for molding or otherwise forming inner tubes
84779085	Parts of machinery for working rubber or plastics or for the manufacture of products from these materials, nesi
84799094	Parts of machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84, nesi
84802000	Mold bases
84803000	Molding patterns
84804100	Molds for metal or metal carbides, injection or compression types
84804900	Molds for metal or metal carbides, other than injection or compression types
84807180	Molds for rubber or plastics, injection or compression types, other than for shoe machinery or for manufacture of semiconductor devices
84811000	Pressure-reducing valves for pipes, boiler shells, tanks, vats or the like
84812000	Valves for oleohydraulic or pneumatic transmissions
84813090	Check valves other than of copper or iron or steel, for pipes, boiler shells, tanks, vats or the like
84819090	Parts of taps, cocks, valves and similar appliances for pipes, boiler shells, tanks, vats or the like, nesi
84821050	Ball bearings other than ball bearings with integral shafts
84822000	Tapered roller bearings, including cone and tapered roller assemblies
84824000	Needle roller bearings
84825000	Cylindrical roller bearings
84828000	Ball or roller bearings nesi, including combined ball/roller bearings
84834090	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements entered separately
84835060	Flywheels, nesi
84835090	Pulleys, including pulley blocks, nesi
84836040	Clutches and universal joints
84839010	Chain sprockets and parts thereof
84839080	Parts of transmission equipment, nesi
84841000	Gaskets and similar joints of metal sheeting combined with other material or of two or more layers of metal
84849000	Sets or assortments of gaskets and similar joints dissimilar in composition, put up in pouches, envelopes or similar packings
84879000	Machinery parts, not containing electrical connectors, insulators, coils, contacts or other electrical features and other parts nesi
85011040	Electric motors of an output of under 18.65 W, other than synchronous valued not over \$4 each
85012060	Universal AC/DC motors of an output of 746 W or more
85013120	DC motors nesi, of an output exceeding 37.5 W but not exceeding 74.6 W
85015120	AC motors nesi, multi-phase, of an output exceeding 37.5 W but not exceeding 7406 W

85015140	AC motors, nesi, multi-phase, of an output exceeding 7406 W but not exceeding 735 W
85015140	AC motors, nesi, multi-phase, of an output exceeding 7406 W but not exceeding 735 W
85015160	AC motors nesi, multi-phase of an output of 746 W but not exceeding 750 W
85015280	AC motors nesi, multi-phase, of an output exceeding 14092 kW but not exceeding 75 kW
85030020	Commutators suitable for use solely or principally with the machines of heading 8501 or 8502
85030075	Parts of electric motors under 18065 W, other than commutators, stators or rotors
85044040	Electrical speed drive controllers for electric motors (static converters)
85049096	Parts (other than printed circuit assemblies) of electrical transformers, static converters and inductors
85051910	Flexible permanent magnets, other than of metal
85052000	Electromagnetic couplings, clutches and brakes
85059030	Electromagnetic lifting heads
85059040	Electromagnetic or permanent magnet work holders and parts thereof
85059075	Printed circuit assemblies of electrical transformers, static converters and inductors, neso
85065000	Lithium primary cells and primary batteries
85069000	Parts of primary cells and primary batteries
85079080	Parts of storage batteries, including separators therefor, other than parts of lead-acid storage batteries
85141000	Resistance heated industrial or laboratory furnaces and ovens
85151100	Electric soldering irons and guns
85151900	Electric brazing or soldering machines and apparatus, other than soldering irons and guns
85152900	Electric machines and apparatus for resistance welding of metal, other than fully or partly automatic
85153100	Electric machines and apparatus for arc (including plasma arc) welding of metals, fully or partly automatic
85153900	Electric machines and apparatus for arc (including plasma arc) welding of metals, other than fully or partly automatic
85158000	Electric welding apparatus nesi, and electric machines and apparatus for hot spraying metals or sintered metal carbides
85159020	Parts of electric welding machines and apparatus
85159040	Parts of electric soldering or brazing machines & apparatus, & electric apparatus for hot spraying of metals or sintered metal carbides
85256010	Transceivers
85256020	Transmission apparatus incorporating reception apparatus, other than transceivers
85261000	Radar apparatus
85269100	Radio navigational aid apparatus, other than radar

85269250	Radio remote control apparatus other than for video game consoles
85285925	Color video monitors w/flat panel screen, video display diagonal n/ov 34.29 em, not incorporate VCR or player
85285933	Color video monitors w/flat panel screen, video display diagonal > 34.29 em, not with VCR/player, not subj US note 13
85286960	Color video projectors nesoi, not incorporating a video recording or reproducing apparatus
85287264	Color television reception apparatus w/flat panel screen, video display diagonal over 34.29 em, incorporating a VCR or player
85291040	Radar, radio navigational aid and radio remote control antennas and antenna reflectors, and parts suitable for use therewith
85299022	Other printed circuit assemblies suitable for use solely or principally with the apparatus of headings 8525 to 8528 nesi
85299078	Mounted lenses for use in closed circuit television cameras, separately imported, w/ or w/o attached elec. connectors or motors
85299081	Other parts of television cameras nesoi
85299097	Parts suitable for use solely or principally in radar, radio navigational aid or radio remote control apparatus, nesi
85299099	Parts suitable for use solely or principally with the apparatus of headings 8525 to 8528, nesi
85321000	Fixed electrical capacitors designed for use in 50/60 Hz circuits and having a reactive power handling capacity of not less than 0.5 kvar
85322100	Tantalum fixed capacitors
85322200	Aluminum electrolytic fixed capacitors
85322300	Ceramic dielectric fixed capacitors, single layer
85322400	Ceramic dielectric fixed capacitors, multilayer
85323000	Variable or adjustable (pre-set) electrical capacitors
85331000	Electrical fixed carbon resistors, composition or film types
85332100	Electrical fixed resistors, other than composition or film type carbon resistors, for a power handling capacity not exceeding 20 W
85332900	Electrical fixed resistors, other than composition or film type carbon resistors, for a power handling capacity exceeding 20 W
85333100	Electrical wirewound variable resistors, including rheostats and potentiometers, for a power handling capacity not exceeding 20 W
85334080	Electrical variable resistors, other than wirewound, including rheostats and potentiometers
85334080	Electrical variable resistors, other than wirewound, including rheostats and potentiometers
85339080	Other parts of electrical resistors, including rheostats and potentiometers, nesi
85353000	Isolating switches and make-and-break switches, for a voltage exceeding 1,000 V
85359080	Other parts of electrical resistors, including rheostats and potentiometers, nesi

85361000	Fuses, for a voltage not exceeding 1,000 V
85362000	Automatic circuit breakers, for a voltage not exceeding 1,000 V
85363040	Electrical motor overload protectors, for a voltage not exceeding 1,000 V, nesi
85364100	Relays for switching, protecting or making connections to or in electrical circuits, for a voltage not exceeding 60 V
85364100	Relays for switching, protecting or making connections to or in electrical circuits, for a voltage not exceeding 60 V
85365040	Electrical motor starters (which are switches), for a voltage not exceeding 1,000 V
85365090	Switches neso, for switching or making connections to or in electrical circuits, for a voltage not exceeding 1,000 V
85366100	Electrical apparatus for switching or protecting electrical circuits, or for making connections to or in electrical circuits
85366940	Connectors: coaxial, cylindrical multicontact, rack and panel, printed circuit, ribbon or flat cable, for a voltage not exceeding 1,000 V
85369040	Electrical terminals, electrical splicers and electrical couplings, wafer probers, for a voltage not exceeding 1,000 V
85369085	Other electrical apparatus nesi, for switching or making connections to or in electrical circuits, for a voltage not exceeding 1,000 V, neso
85371080	Touch screens without display capabilities for incorporation in apparatus having a display
85381000	Parts of boards, panels, consoles, desks, cabinets and other bases for the goods of heading 8537, not equipped with their apparatus
85389040	Parts for articles of 8535.90.40, 8536.30.40 or 8536.50.40, of ceramic or metallic materials, mech. or elec. reactive to changes in temp.
85389060	Molded parts nesi, suitable for use solely or principally with the apparatus of heading 8535, 8536 or 8537
85389081	Other parts nesi, suitable for use solely or principally with the apparatus of heading 8535, 8536 or 8537
85392930	Electrical filament lamps nesi, designed for a voltage not exceeding 100 V, excluding ultraviolet and infrared lamps
85412100	Transistors, other than photosensitive transistors, with a dissipation rating of less than 1W
85412900	Transistors, other than photosensitive transistors, with a dissipation rating of 1 W or more
85414020	Light-emitting diodes (LEDs)
85414070	Photosensitive transistors
85416000	Mounted piezoelectric crystals
85432000	Electrical signal generators
85441100	Insulated (including enameled or anodized) winding wire, of copper
85443000	Insulated ignition wiring sets and other wiring sets of a kind used in vehicles, aircraft or ships

85444930	Insulated electric conductors nesi, of copper, for a voltage not exceeding 1,000 V, not fitted with connectors
85446020	Insulated electric conductors nesi, for a voltage exceeding 1,000 V, fitted with connectors
87084099	Other gear boxes and parts thereof
87089981	Parts and accessories of the motor vehicles of headings 8701 to 8705
90029095	Mounted optical elements, nesi; parts and accessories of mounted optical elements, nesi
90132000	Lasers, other than laser diodes
90138070	Liquid crystal and other optical flat panel displays other than for articles of heading 8528, nesoi
90183900	Catheters, cannulae and the like nesi, used in medical, surgical, dental or veterinary sciences, and parts and accessories thereof
90221900	Apparatus based on the use of x-rays other than for medical, surgical, dental or veterinary use.
90261020	Electrical instruments and apparatus for measuring or checking the flow or level of liquids
90261040	Flow meters, other than electrical, for measuring or checking the flow of liquids
90261060	Instruments and apparatus for measuring or checking the level of liquids, other than flow meters, non-electrical
90262040	Electrical instruments and apparatus for measuring or checking the pressure of liquids or gases
90262080	Instruments and apparatus, other than electrical, for measuring or checking the pressure of liquids or gases
90268020	Electrical instruments and apparatus for measuring or checking variables of liquids or gases, nesi
90268060	Nonelectrical instruments and apparatus for measuring or checking variables of liquids or gases, nesi
90269020	Parts and accessories of electrical instruments and apparatus for measuring or checking variables of liquids or gases
90269060	Parts and accessories of nonelectrical instruments and apparatus for measuring or checking variables of liquids or gases, nesi
90273040	Spectrometers, spectrophotometers and spectrographs using optical radiations (ultraviolet, visible, infrared)
90303338	Other instruments and apparatus, nesi, for measuring or checking electrical voltage, current, resistance or power, without a recording device
90314990	Other optical measuring or checking instruments, appliances and machines, nesoi
90318080	Measuring and checking instruments, appliances and machines, nesoi
90319091	Parts and accessories of measuring or checking instruments, appliances and machines, nesoi
90321000	Automatic thermostats
90328960	Automatic regulating or controlling instruments and apparatus, nesi

90329061	Parts and accessories for automatic regulating or controlling instruments and apparatus, nesi
90330090	Other parts and accessories for machines, appliances, instruments or apparatus of chapter 90, nesi
94019010	Parts of seats nesoi, for seats of a kind used for motor vehicles
85152100	Electric machines and apparatus for resistance welding of metal, fully or partly automatic