The Vehicle Suppliers Association

Comments of

MEMA, The Vehicle Suppliers Association

to the

Department of Commerce

Bureau of Industry and Security

on the

Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Trucks

May 16, 2025

Docket No. 250422-0071

Introduction

MEMA, The Vehicle Suppliers Association, established in 1904, is the leading trade association in the U.S. for vehicle suppliers, parts manufacturers, and remanufacturers. The mobility sector depends on the resiliency and strength of suppliers. MEMA's members design and manufacture the technology, components and services that enable the production of new vehicles as well as the essential maintenance and repair of the more than 295 million highway vehicles that are currently on the road in the U.S.

Our sector is an intrinsic and essential part of the U.S. economy. Vehicle suppliers employ more than 930,000 direct individuals, a number which has grown since the implementation of the USMCA. Suppliers operate facilities in all 50 states and in more than 350 Congressional districts, with significant concentrations in the Midwest and Southeast. The supplier sector has also added jobs from different types of businesses and professional backgrounds, reflecting the dynamic and evolving nature of the industry.

Concerning the commercial vehicle supplier sector, a recent MEMA national employment study found that U.S. employment in the medium and heavy-duty commercial vehicle supplier sector increased by 5.6% since 2019 due to growth in truck trailer and body manufacturing, as well as tires and telematics.[1] Ohio, Indiana, Texas and Michigan saw the most significant increases in jobs for this segment of the supplier industry.

[1] MEMA Employment Study – December 2024

MEMA submits the following comments in response to the Bureau of Industry and Security's (BIS) April 25, 2025, Federal Register notice[2]. MEMA supports the Administration's objectives to strengthen domestic manufacturing and address vulnerabilities in supply chains. However, we caution that applying new tariffs or other restrictive measures on commercial vehicle (CV) imports or CV parts could have unintended and harmful consequences for the U.S. trucking sector, its supply base, and the broader economy. It is critical to note that the industry is already facing a challenging landscape. In May 2025, S&P Global Mobility issued a revised CV outlook for 2025 which projects "a 7% decline in North American new truck and bus sales for 2025, the second-largest forecast slide among any region following the sharpest downgrade. New truck registrations in the region are expected to decrease by 8% year-over-year in 2025. Class 8 trucks will see the most dramatic decline this year, with unit sales projected at just 270,000, a decrease of 12% year-over-year."[3]

Background

Vehicle suppliers are responsible for much of the content on modern vehicles and play an essential role in creating, mobilizing and adapting the global supply chains that support the mobility sector. MEMA urges BIS to consider the impact that any resulting actions from this investigation may have on the commercial vehicle industry and the U.S. economy.

Vehicle suppliers provide approximately 77 percent of the value of the vehicle[4]. Suppliers manufacture materials, parts, software and systems for a wide range of customers including new vehicle manufacturers (OEMs) and other Tier 1-3 suppliers. Suppliers also manufacture products for the aftermarket by way of multiple channels to provide vehicle service technicians and commercial fleets the parts and materials needed for maintenance and repair. MEMA members manufacture and produce essential vehicle components and materials, such as axles, brakes, tires, wheels, batteries, wire harnesses, seats, transmissions, engines, pumps, steering components, motors, sensors, injectors, electronic control units (ECUs) and thousands more.

In the vehicle manufacturing industry, suppliers are categorized in tiers. Tier 1 manufacturers provide new original equipment, such as finished parts, components, software and systems directly to the OEMs. Tier 2 manufacturers are niche or specialty component manufacturers that provide subcomponents and other content to Tier 1 manufacturers. Tier 3 companies are typically the suppliers of raw or semi-finished materials such as metals or plastics, for both Tier 1 and 2 suppliers. Often, Tier 2 and 3 suppliers also provide products to customers in other industries outside of the mobility sector. These tiers are not exclusive, there are many situations where suppliers may act as Tier 1 suppliers to OEMs, but also Tier 2 suppliers to a Tier 1. As a result, the supply chain, customers, and jobs they support are highly

[2] Federal Register: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Trucks
[3] Commercial Vehicle Forecast Cut for 2025 | S&P Global
[4] AUTOMOTIVE AFTERMARKET INDUSTRY ANALYSIS–2023

interdependent- one change to the supply chain will cause ripple effects across the industry. The vehicle industry has seen first-hand how disruptions further up the supply chain can have a lasting impact. In 2022, the industry experienced an acute semiconductor shortage that affected almost every supplier and a range of component types[5]. Due to the interdependence of the vehicle supply chain, MEMA urges BIS to avoid taking unilateral actions that will affect the entire industry and its components.

Manufacturing and sourcing for certain commercial vehicle components such as axles, engines and transmissions often occur domestically or within USMCA countries. However, the industry as a whole relies on the global importation of some key systems such as engine management, braking, connectivity and steering; as well as their components. Long-distance importation of some of these heavy-duty parts is necessary due to the location of established supply chains which, due to their economies of scale considering technology and costs, are not currently feasible to duplicate or transfer to the US.

The U.S. commercial vehicle industry also faces constraints in domestic production capacity, specifically in labor-intensive production areas, where labor shortages and rising costs persist. For example, there are many products that are sourced internationally, which allows for increased economies of scale for manufacturing. As such, many components such as ECUs, wire harnesses, front axles and brake drums rely on foreign sources due to the lack of manufacturing capacity in the U.S. The motor vehicle supply chain is vast and complex, which leads to obstacles in reshoring efforts where domestic capabilities are unable to meet demand.

MEMA is supportive of policies to strengthen domestic manufacturing and create more resilient supply chains. MEMA urges BIS to consider the negative impact that the imposition of a tariff regime, as a result of this investigation, will have on the supplier industry's manufacturing and overall economic footprint in the U.S. Tariffs on the commercial vehicle industry would interact with competing tariff regimes, such as the IEEPA tariffs, the existing tariffs on steel and aluminum and steel and aluminum derivatives and the Section 232 tariffs on select automobile parts (many suppliers produce for both the automotive and the commercial vehicle industries). The industry is also monitoring and engaging in the ongoing Section 232 investigations into semiconductors and critical minerals which could further restrain key inputs and materials needed for U.S. production. This creates an environment that is increasingly difficult for vehicle suppliers to navigate. Member companies have consistently conveyed their concerns that tariffs on commercial vehicle parts and components would impede growth and potentially destabilize the supply chain in the U.S.

Section 232 tariffs on trucks and truck parts would enter a crowded landscape of tariffs on motor vehicle products, as noted above. Recent surveys of MEMA Original Equipment and Aftermarket executive members have shown that the collective Section 232 trade actions are weighing on suppliers as a priority concern, with 72% indicating the actions would have a

[5] The semiconductor shortage is – mostly – over for the auto industry | S&P Global

negative impact on their businesses[6]. Suppliers operate in 6-8% profitability ranges, and fleets have even smaller margins[7]. The industry has a high elasticity of demand and fluctuations in pricing are quickly felt by the end customer, leading to changes in buying schedules and shipping rates. As noted above, the supplier industry is being impacted by multiple tariff regimes. Consequently, MEMA urges the Administration to consider the harm that could result from taking broad action, in the form of across the board tariffs or other restrictive measures, as a result of this investigation.

The Commercial Vehicle Industry is Fundamentally Different from the Passenger Car Sector:

Trucking is critical to the American economy – in 2022, trucks moved approximately 72% of the nation's freight weight[8]. The highway and motor carrier system is critical infrastructure, and encompasses 4 million miles of roadway that facilitates the use of commercial vehicles to serve essential functions[9]. Further, the trucking industry employed 8.5 million people throughout the economy. Trucks also play a critical role in international trade- facilitating 66% of surface trade between the U.S. and Canada, and 85% of surface trade between the U.S. and Mexico in 2023. The vehicle supplier industry plays a critical role in supporting the motor vehicle at large - supporting 4.5 million jobs in the U.S. The vehicle supplier industry directly employs over 930,000 Americans, reflecting an additional 61,000 jobs since 2015[10]. Specifically, the medium and heavy duty commercial vehicle supplier sector increased employment by 5.6%. Suppliers play a crucial role in both the production, maintenance, and repair of the registered 14.33 million single-unit and combination trucks. These vehicles traveled 331.27 billion miles in 2022.

1. The Commercial Vehicle Industry is Comprised of Several Vehicle Classes which Serve Integral Functions

A commercial vehicle is a vehicle that is used primarily for business purposes, including transporting goods or paying customers. These vehicles encompass a wide range of vehicles from trucks and buses to vans and even specialized equipment. In the U.S. a vehicle is classified as commercial if it has a Gross Vehicle Weight Rating (GVWR) of 10,0001 pounds or more. Vehicles that meet this GVWR requirement are subject to special federal regulations, including safety standards, licensing, and inspection protocols. Suppliers are critical in the provision of the technology that allows for the safe operations of these vehicles.

Commercial vehicles are divided by different classes based on their GVWR. These classes are:

- Class 3: GVWRs between 10,0001 and 14,000 pounds. These include mini-buses and city delivery vehicles.

[6] MEMA Research Department Survey May 2, 2025
[7] Route 2030 - The fast track to the future of the commercial vehicle industry_vf.ashx
[8] Economics and Industry Data | American Trucking Associations
[9] Transportation Systems Sector | Cybersecurity and Infrastructure Security Agency CISA
[10] MEMA Employment Study – December 2024

- Class 4: GVWRs between 14,0001 to 16,000 pounds. These trucks are used for delivery, construction, and landscaping. Examples include box trucks and some larger pickup trucks.
- Class 5: GVWRs between 16,0001 and 19,500 pounds. This includes larger delivery trucks, bucket trucks, and construction vehicles.
- Class 6: GVWRs range from 19,501 to 26,000 pounds. These trucks are used for a single axle and beverage trucks, rack trucks, and school buses.
- Class 7: GVWRs range from 26,001 to 33,000 pounds. This class includes large delivery trucks, refuse trucks, and some heavy-duty commercial vehicles.
- Class 8: GVWRs are 33,001 pounds and greater. This class includes big rigs, tractor-trailers, and other heavy-duty vehicles like dump trucks and cement mixers.

As noted above commercial vehicles encompass a large range of vehicle types and functions. The commercial vehicle sector provides a diverse range of essential services. It is important that BIS consider the diversity among the sector and not pursue unilateral actions.

2. The Commercial Vehicle Sector is Critical to U.S. Economic Growth

Unlike passenger cars, which are used for personal transportation, commercial vehicles are essential tools of trade. These vehicles directly support the core operations of businesses across the U.S., transporting goods, delivering services, and supporting field operations.

These vehicles are central to revenue generation and any disruption to their service has an immediate impact on American businesses. Brief periods of vehicle inoperability can have a large impact on profitability, especially for small and medium-sized businesses.

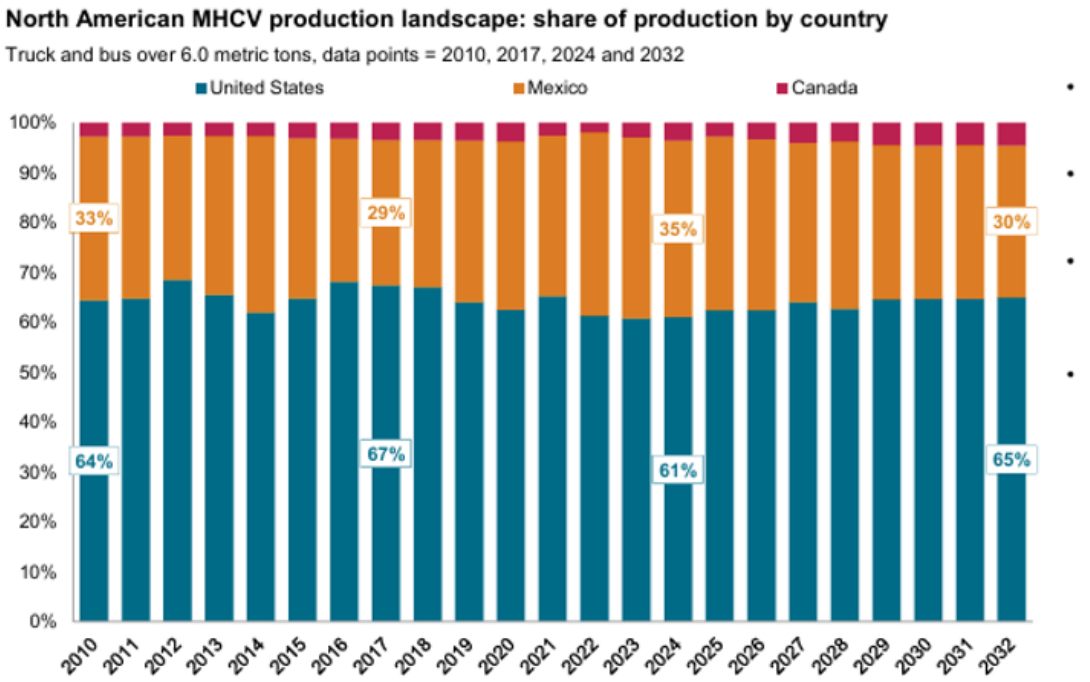
The commercial vehicle market is expected to grow through 2030, reaching $1,276 billion, an increase from $638 billion in 2023[11]. Part of this rapid boom is driven by the growth of the e-commerce sector, which has increased demand for commercial vehicles to deliver goods.

This projected growth demonstrates that CVs are not just assets but serve an important purpose as economic enablers. The operational continuity of CVs is critical for the success of individual businesses.

3. The Commercial Vehicle Industry is Highly Specialized and Localized

Another unique aspect of the CV industry is that the industry is both localized and specialized. One reason is due to the long-nose designs that are used on U.S. manufactured trucks compared to the cab-over-engine design. The use of the long-nose design allows for increased driver comfort and crash safety[12]. As a result, the trucks manufactured by the OEMs are better adapted to U.S. infrastructure, U.S. regulatory requirements, and long-haul need. As a correlation, commercial vehicle suppliers have worked steadily to onshore and meet customers' requirements.

[11] U.S. Commercial Vehicle Market Size & Share | Forecast [2030]
[12] 15 Reasons American Trucks Barely Resemble European Versions



Source: S&P Global Mobility (March 2025)
MHCV = Medium and Heavy-Duty Vehicles

Recent surveys of MEMA members illustrate this point- the U.S. dominates the production of Class 8 trucks and tractors, representing roughly 60% of production in the region. In the above graphic, the U.S. dominates across both the medium and heavy-duty sectors. This strength is expected to continue through 2032. While the commercial vehicle sector is localized when warranted, the industry is still constrained in its ability to further shift production and sourcing to the U.S. for various reasons. Survey results illustrate that nearly 70% of commercial vehicle original equipment suppliers state that it would be minimally or not at all feasible to make this shift. The commercial vehicle aftermarket further illustrates this point- with 82% of suppliers indicating their inability to shift production and sourcing to the U.S.

The commercial vehicle supply base is comprised of a limited number of highly specialized manufacturers. While some of this production occurs locally, the industry is still dependent on the global vehicle supply chain to provide essential components such as electronics, forging, and castings, which are not produced at scale in the U.S. Commercial vehicles are designed to serve diverse applications, ranging from freight and construction to utility and emergency services. This leads to high levels of customization and variability, which requires a broad range of specialized components, systems, and materials. Many of these are produced by small, highly focused suppliers. This high level of specialization occurs in the commercial vehicle industry because suppliers must make strategic decisions on how to allocate limited production capacity in a way that maximizes revenue, long-term relationships and operational efficiency.

Aggressive tariff action on this sector will have immediate and direct impacts on the supply chain, and therefore the deployment of vehicles that ensure the provision of critical goods and services.

4. The Freight Recession and Economic Fragility have Increased Pressure on Industry

The CV industry is in the process of navigating a freight recession which has continued for over two years. This period was marked by a downturn in the logistics and transportation sector, driven by factors such supply chain uncertainty and changes to operational costs. Freight recessions are marked by periods of decreased freight volumes, price pressure and rate volatility, financial strain, and idle equipment and resources. This has been exacerbated by continued recovery from disruptions related to COVID-19, labor shortages, and economic conditions that have suppressed investments[13]. In its May 2025 update, S&P Global Mobility stated that "A decline in freight demand due to economic uncertainties is expected to lead transport companies to postpone investments in new trucks. This caution is already reflected in declining new order intake rates for trucks."[14]

This situation has led fleets to postpone purchases of new equipment, impacting suppliers' bottom lines as they face increased economic uncertainty and additional pressure from the existing tariff regimes. The imposition of Section 232 duties on commercial vehicles and related components would exacerbate cost burdens and undermine the ability of fleets to modernize their equipment. For vehicles to remain in operation, access to affordable service and replacement parts is essential. Without budget-friendly options, financially strained fleets may be forced to delay or skip necessary maintenance, potentially compromising safety on public roads. Suppliers are critical to the roadway safety improvements- 2023 saw an 8% decline in traffic death involving large trucks[15]. The continued deployment of advanced supplier technology is critical to national safety. Tariff action would delay the deployment of advanced technologies, including critical safety systems, and decrease competitiveness. MEMA urges BIS to consider the fragility of the CV industry as it navigates out of this period of economic uncertainty and not pursue any broad tariff action as a result of this investigation.

<u>BIS Must Consider Capacity Limitations</u>

In addition to the unique constraints posed by the industry footprint and economic instability, commercial vehicle suppliers also face a capacity-constrained production market that increases supply chain uncertainty.

Surveys of both commercial original equipment and aftermarket suppliers illustrate an inability to increase capacity in the U.S. to domestically manufacture imported parts. In response to a May 2025 MEMA survey, 76% of original equipment suppliers stated there was little or no excess capacity to support volumes, while 82% of aftermarket suppliers highlighted similar capacity constraints.

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[13] What is a Freight Recession? The 2023-2025 U.S. Freight Recession Explained
[14] Commercial Vehicle Forecast Cut for 2025 | S&P Global
[15] Traffic Safety Fact - 2023 Data - Large Trucks

These constraints are exacerbated by labor shortages and rising costs. These challenges remain a major concern for Tier 2 and Tier 3 suppliers, especially as the cost of labor continues to grow. Some of these labor-intensive and lower-profit processes, such as foundry work and ball bearing production, are performed overseas to address these shortages. Further, there is a lack of skilled labor available to fill the current open roles in the U.S. MEMA is supportive of pro-manufacturing policies that seek to provide long-term workforce development and other incentives to address these shortages.

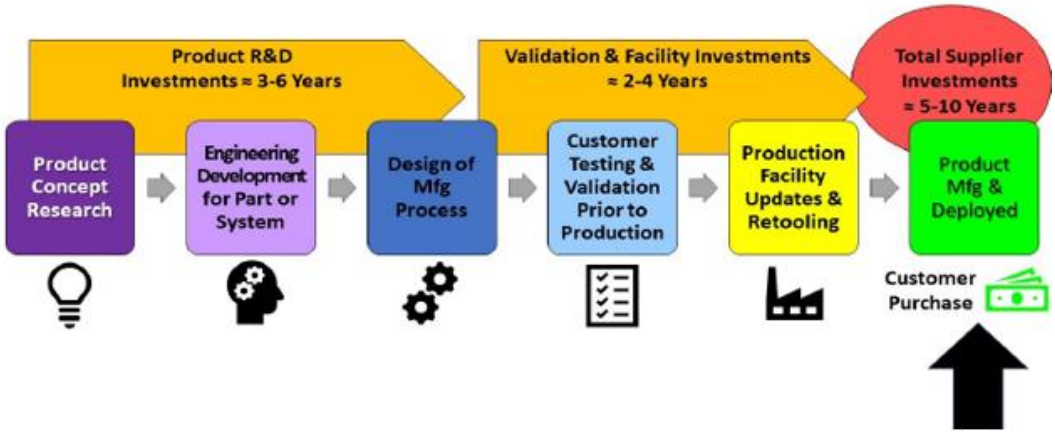
Labor shortages have a downstream impact which forces suppliers to prioritize higher-volume orders, typically those of larger customers. In an industry with smaller production volumes but a large economic footprint, suppliers are forced to prioritize these larger orders to improve manufacturing efficiency and reduce-per unit costs. Additionally, many Tier 1 suppliers also have long-standing contractual agreements that obligate this prioritization. These larger customers provide more predictable demand forecasts, which offer much-desired stability to the supply base. As a result, smaller customers may find themselves experiencing longer lead time and other challenges. This dynamic creates risks for small and medium-size suppliers that struggle to maintain supply continuity and may accelerate consolidation of the supply base, with smaller players seeking alternative sourcing that is not available.

Further, the industry requires investment and time to build up the supply chain necessary to support U.S. demand. For example, suppliers rely on a vast supply chain to provide semiconductors, connectors, and printed circuit boards for incorporation into truck parts. The U.S. lacks sufficient domestic production in some of these labor-intensive areas and advanced technology. It is critical that the commercial vehicle industry continue to have access to these subcomponents, as the industry maintains a limited supply. While MEMA is supportive of efforts by the Administration to onshore production across the entire vehicle supply chain, it is important that there is sufficient time allocated to build the intrinsic infrastructure and framework for domestic production.

Further, the Administration must consider the unique perspective of the commercial vehicle sector in its reshoring efforts. The commercial vehicle sector operates on smaller production volumes and will therefore require significant investment to achieve a stable domestic supply. MEMA cautions the Administration that these efforts, in an industry with lower production volumes, may have limited results.

The Commercial Vehicle Industry Requires Time to Transition

MEMA respectfully requests that BIS consider the lengthy product planning and investment timeline that vehicle suppliers require to ensure the safe deployment of their technologies. This timeline includes safety development and validation to ensure that performance requirements are met. Companies' supply chains for highly advanced modern vehicles require access to a multitude and diversity of sourcing for necessary materials, subcomponents, and technologies at the required volumes and quantity levels to remain globally competitive.



MEMA urges BIS to consider how actions that result from this investigation may impact the current supply of medium and heavy trucks and truck parts. The above graphic outlines the timeline that motor vehicle suppliers must consider when planning their investments. The research and development cycle represents 3-6 years, followed by another 2-4 years of validation and facility investments. This data is confirmed by surveyed MEMA members, who confirmed that the industry would require significant lead-time to shift some portions of production to the U.S. The majority of respondents indicated their companies would require between 12-24 months to make these changes. This illustrates the time needed for suppliers to bid on, acquire, create the requisite supply chain plan for, validate, and commence production for a vehicle platform with a customer. In addition to this process, suppliers must also consider the lengthy OEM cycle.

Timing is critical for vehicle suppliers, who do not see a return on their investment until the product is manufactured and deployed. It is critical that BIS consider the impact that tariffs would have on the commercial vehicle sector. Domestic capacity does not exist at scale for casting, rare earth minerals, and electronics. It would take a minimum of 7-10 years to develop, finance, and operationalize new capacity for these critical components.

While this process is lengthy, it is a demonstration of the industry's commitment to the safe deployment of technology on American roadways. Abrupt changes to the supply chain can lengthen and disrupt this process. Uncertainty and loss of supply sources can result in missed business opportunities for suppliers, and the disruption of vehicle development, production, deployment, service and repair. The high rates of specialization in the commercial vehicle industry exacerbate these concerns, as disruptions to the supply chain are acutely felt by suppliers, customers, and fleet operators.

USMCA Has Enabled Industry Growth and Greater Supply Chain Resiliency

Commercial vehicle suppliers rely upon the U.S.-Mexico-Canada (USMCA) agreement for their daily operations. On behalf of its members, MEMA worked closely with the Trump Administration and with the leadership at USTR during the negotiation of the USMCA. The overall supplier community subsequently supported the Congressional consideration and passage of this critical and landmark trade agreement. Agreements with trusted partners, like

USMCA, are critical to ensure U.S. manufacturers have access to a secure supply chain to deliver critical safety technology.

The integration of the industry across North America provides clear benefits, enabling growth and accelerating the adoption of advanced technology for commercial vehicles. A MEMA national employment study, completed at the end of 2024, found that U.S. production of engines for medium and heavy duty vehicles grew 8.6% since 2019. From 2019 to 2023, U.S. employment in the medium and heavy duty commercial vehicle supplier sector increased by 5.6% due to growth in truck trailer and body manufacturing, as well as tires and telematics.[16] Ohio, Indiana, Texas and Michigan saw the most significant increases in jobs for this segment of the supplier industry.

The USMCA agreement sets new and much more stringent Regional Value Content (RVC) requirements for commercial vehicles and for the two categories of commercial vehicle components (Principal Parts and Complementary Parts). The industry is still in the midst of this transition to the highest USMCA thresholds and is addressing the related realignment of supply chains. The top RVC levels for trucks and for the two categories of truck complements will be fully phased in as of July 2027.

MEMA surveyed its members in April 2025 to understand the current status of the industry relative to the USMCA requirements. The original equipment CV suppliers that responded to the survey noted that 76% of their finished products are USMCA compliant and 51% of their materials and components are USMCA compliant.

The CV aftermarket respondents declared that 67% of their materials and components are USMCA compliant while 58% of their finished products are USMCA compliant. Twenty-one percent of the respondents further estimated that it will take 1-2 months to reach USMCA compliance, with 35% of the respondents indicating an expected timeline of over 12 months to reach full compliance. This data reflects the journey currently being experienced by commercial vehicle suppliers as they move towards the July 2027 USMCA phase in date.

In light of the importance of USMCA to the industry and to the successful and competitive production of medium and heavy duty finished vehicles, we request that the Administration allow for a clear and stable USMCA flexibility if a final decision is made to impose tariffs on commercial vehicle components. Any disruption to the supply chain network across North America will severely impact the industry's U.S. operations, companies and production volumes.

The Commercial Vehicle Industry Requires Stability to Encourage Continued Innovation, Investment, and Job Growth

The commercial vehicle industry requires stability in order to continue innovation, investment, and job growth. Commercial vehicles have a platform production lifetime that extends 15 years. As a result, commercial vehicle suppliers must make platform-level investments in tools,

[16] MEMA Employment Study – December 2024

equipment, and engineering support over these extended timelines. Suppliers also support the lifetime of the vehicle, which can extend over 15 years after leaving the assembly line. The industry requires a stable policy environment in order to justify long-term capital investments. Unilateral tariff action resulting from this investigation will destabilize the commercial vehicle industry, which plays a critical role in provision of goods and services in the U.S.

Commercial vehicle suppliers are already facing increased challenges as a result of competing tariff regimes, these will be exacerbated by the potential imposition of additional tariffs on commercial vehicle parts. It is difficult for suppliers to absorb these costs as industry struggles to emerge from the freight recession. Tariff-related price increases lead to additional strain on fleet operators and the overall market. The increased uncertainty has already led to changes in customer behavior, and suppliers have begun to experience scaled back or canceled orders. The commercial vehicle aftermarket segment relies on suppliers to provide a wide range of products, ranging from premium branded to budget lines, the latter often sourced from best-cost countries. This diversity is critical in the commercial vehicle aftermarket, where pricing and product flexibility enable suppliers to serve a wide range of customer needs, and remain competitive in our market. Tariffs threaten to eliminate access to affordable product tiers, putting suppliers at a competitive disadvantage and reducing the availability of cost-effective repair and maintenance parts.

As a result of this strain, suppliers across both market segments are preparing to make difficult decisions surrounding employment and investment planning. Since the implementation, suppliers are already preparing to make significant reductions in U.S. production and non-production employee headcount and overall U.S. investment. These changes are expected to persist over the next 12 months. Overall, the tariffs will have a cooling effect on U.S. investment and employment by the commercial vehicle industry. Instead, companies expect to increase non-U.S. investment over the next year, likely to address increased uncertainty.

Vehicle suppliers are the largest manufacturing employer in the U.S. and the backbone of the nation's manufacturing industry. The commercial vehicle supplier sector plays a critical role in the U.S. economy by facilitating the transportation of goods and services across North America. Broad tariff action will negatively impact U.S. investment and employment and destabilize the commercial vehicle supply chain. Given its strategic importance, this will have trickle down effects across the entire U.S. economy. MEMA remains supportive of the administration's goals to increase domestic production, but urges the pursuit of other methods, such as workforce development, tax incentives for manufacturers, and onshoring initiatives.

Conclusion

MEMA appreciates the opportunity to share its concerns and feedback on this important topic with BIS. MEMA and the supplier community support BIS' efforts to ensure U.S. national security and the Administration's overall objective to enhance domestic manufacturing. As such, MEMA urges BIS to hold a hearing on this investigation. The commercial vehicle sector is

proud of its substantial footprint in the U.S. which enables high production levels and the utilization of significant volumes of local content.

For the reasons articulated above, MEMA is concerned that tariffs or other restrictive measures would damage the domestic commercial vehicle supplier industry. The commercial vehicle supplier network in the U.S. has grown and has increased its supply chain resiliency, but additional cost and pressure – particularly in the midst of a freight recession – will hurt the industry and the thousands of individuals employed by these companies across the U.S.

Suppliers will face severe consequences if production volumes decline further in the U.S., hindering their ability to generate profit, access capital and sustain the resources needed to invest for the future.

MEMA welcomes the opportunity to work with BIS and the Administration as this proceeding moves forward. If you have any questions concerning this document, please do not hesitate to contact Ana Meuwissen at ameuwissen@mema.org or Emily Sobel at esobel@mema.org.