



June 6, 2024

Mr. Juan Millan
Acting General Counsel
Office of the United States Trade Representative
600 17th Street N.W.
Washington, DC 20508

RE: Request for Comment Deadline Extension on Section 301 China Tariff Modifications (Docket Number USTR-2024-0007)

Dear Mr. Millan:

On behalf of the undersigned members of Americans for Free Trade, we respectfully request that the Office of the United States Trade Representative (USTR) extend the public comment period announced in its Federal Register notice issued on May 28, 2024 regarding proposed modifications to the ongoing Section 301 China tariff actions, including proposed rate increases for new HTS lines, a new exclusion process limited to machinery for U.S. manufacturing, and specific exclusions for solar manufacturing equipment.¹ Comments are currently due on June 28, 2024. We believe an extension of at least 30-days – to July 28, 2024 – is in the public interest.

By way of background, [Americans for Free Trade](#) represents every part of the U.S. economy including manufacturers, farmers and agribusinesses, powersports, retailers, technology companies, service suppliers, natural gas and oil companies, importers, exporters, and other supply chain stakeholders. Collectively, we employ tens of millions of Americans through our vast supply chains.

USTR's proposed tariff modifications and limited exclusion process are highly relevant to the undersigned AFT members, who collectively represent thousands of U.S. companies and millions of American workers. Many of our members are small businesses and U.S. manufacturers, critical stakeholders in this review process. We are actively surveying our collective membership to gather feedback on the projected impacts of the proposed modifications and document them in a manner that is most helpful to USTR. However, our members have indicated that they require additional time to gather and assess such information given the breadth of HTS lines involved and given the prescribed comment format on USTR's docket.

In addition to an extension, we request that USTR organize a public hearing to allow stakeholders the opportunity to present their views on the proposed tariff modifications and exclusions to the administration directly. A public hearing would be consistent with past USTR

¹ *Request for Comments on Proposed Modifications and Machinery Exclusion Process in Four-Year Review of Actions Taken in the Section 301 Investigation: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 89 Fed. Reg. 46,252 (May 28, 2024).

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practice regarding the Section 301 tariff actions, when it organized a hearing to inform its investigation in October 2017 and to receive stakeholder input on each set of proposed tariffs and products in May 2018, July 2018, August 2018, and June 2019. It would also give USTR the benefit of asking questions directly to stakeholders regarding the impacts of the proposed modifications and exclusions.

Given the complexity of the proposed modifications, the novelty of the limited exclusion process, and USTR's requirement that the public comment in an HTS-specific format, an extension of at least 30 days is necessary to ensure that the public has adequate opportunity to assess potential impacts to their businesses and offer informed opinions to the administration, both through the comment process and a public hearing.

Sincerely,

Accessories Council	Association For Creative Industries
ACT The App Association	Association for PRINT Technologies
Agriculture Transportation Coalition (AgTC)	Association of American Publishers
Alliance for Chemical Distribution (ACD)	Association of Equipment Manufacturers (AEM)
ALMA, International (Association of Loudspeaker Manufacturing and Acoustics)	Association of Home Appliance Manufacturers
American Apparel & Footwear Association (AAFA)	Auto Care Association
American Association of Exporters and Importers (AAEI)	Bay Area Council
American Association of Port Authorities	Beer Institute
American Bakers Association	Building Service Contractors Association International (BSCAI)
American Bridal & Prom Industry Association (ABPIA)	Business Alliance for Customs Modernization
American Chemistry Council	California Retailers Association
American Clean Power Association	CAWA – Representing the Automotive Parts Industry
American Coatings Association, Inc. (ACA)	Chemical Industry Council of Delaware (CICD)
American Down and Feather Council	Coalition of New England Companies for Trade (CONNECT)
American Fly Fishing Trade Association	Coalition of Services Industries (CSI)
American Home Furnishings Alliance	Colorado Retail Council
American Lighting Association	Columbia River Customs Brokers and Forwarders Assn.
American Petroleum Institute	Computer & Communications Industry Association (CCIA)
American Pyrotechnics Association	Consumer Brands Association
American Rental Association	Consumer Technology Association
American Specialty Toy Retailing Association	Council of Fashion Designers of America (CFDA)
American Trucking Association	CropLife America
Arizona Technology Council	Customs Brokers & Freight Forwarders Assn. of Washington State
Arkansas Grocers and Retail Merchants Association	

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Customs Brokers & Freight Forwarders of Northern California
Electronic Transactions Association
Energy Workforce & Technology Council
Experiential Designers and Producers Association
Exhibitions & Conferences Alliance
Fashion Accessories Shippers Association (FASA)
Fashion Jewelry & Accessories Trade Association
Flexible Packaging Association
Florida Ports Council
Florida Retail Federation
Footwear Distributors and Retailers of America (FDRA)
Fragrance Creators Association
Game Manufacturers Association
Gemini Shippers Association
Georgia Retailers
Global Business Alliance
Global Chamber®
Global Cold Chain Alliance
Greeting Card Association
Halloween & Costume Association (HCA)
Home Fashion Products Association
Home Furnishings Association
Household and Commercial Products Association
Housing Affordability Coalition
Idaho Retailers Association
Illinois Retail Merchants Association
Independent Office Products & Furniture Dealers Association (IOPFDA)
Indiana Retail Council
Information Technology Industry Council (ITI)
International Bottled Water Association (IBWA)
International Foodservice Distributors Association
International Housewares Association
International Warehouse and Logistics Association
International Wood Products Association
ISSA - The Worldwide Cleaning Industry Association
Juice Products Association (JPA)
Juvenile Products Manufacturers Association
Leather and Hide Council of America
Licensing Industry Merchandisers' Association
Los Angeles Customs Brokers and Freight Forwarders Assn.
Louisiana Retailers Association
Maine Grocers & Food Producers Association
Maine Lobster Dealers' Association
Maritime Exchange for the Delaware River and Bay
Maryland Retailers Association
MEMA, The Vehicle Suppliers Association
Michigan Chemistry Council
Michigan Retailers Association
Minnesota Retailers Association
Missouri Retailers Association
Motorcycle Industry Council
NAPIM (National Association of Printing Ink Manufacturers)
National Association of Chain Drug Stores (NACDS)
National Association of Foreign-Trade Zones (NAFTZ)
National Association of Home Builders
National Association of Music Merchants
National Association of Trailer Manufacturers (NATM)
National Confectioners Association
National Council of Chain Restaurants
National Customs Brokers & Forwarders Association of America (NCBFAA)
National Electrical Manufacturers Association (NEMA)
National Fisheries Institute
National Foreign Trade Council
National Grocers Association
National Industrial Transportation League (NITL)
National Lumber and Building Material Dealers Association
National Marine Manufacturers Association
National Restaurant Association
National Retail Federation
National Ski & Snowboard Retailers Association
National Sporting Goods Association
Natural Products Association
New Jersey Retail Merchants Association

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North American Association of Food Equipment Manufacturers (NAFEM)
North American Association of Uniform Manufacturers and Distributors (NAUMD)
North Carolina Retail Merchants Association
Ohio Council of Retail Merchants
Outdoor Industry Association
Pacific Coast Council of Customs Brokers and Freight Forwarders Assns. Inc.
Pennsylvania Retailers' Association
PeopleforBikes
Personal Care Products Council
Pet Food Institute
Pet Advocacy Network
Plumbing Manufacturers International
Power Tool Institute (PTI)
PRINTING United Alliance
Promotional Products Association International
Recreational Off-Highway Vehicle Association
Retail Association of Maine
Retail Council of New York State
Retail Industry Leaders Association
Retailers Association of Massachusetts
RISE (Responsible Industry for a Sound Environment)
RV Industry Association
San Diego Customs Brokers and Forwarders Assn.
Semiconductor Industry Association (SIA)
Snowsports Industries America
Software & Information Industry Association (SIIA)
South Dakota Retailers Association
Specialty Equipment Market Association
Specialty Vehicle Institute of America
Sports & Fitness Industry Association
TechNet
Technology Trade Regulation Alliance (TTRA)
Telecommunications Industry Association (TIA)
Texas Retailers Association
Texas Water Infrastructure Network
The Airforwarders Association
The Fertilizer Institute
The Hardwood Federation
Toy Association
Travel Goods Association
Truck & Engine Manufacturers Association (EMA)
United States Council for International Business
United States Fashion Industry Association
US Global Value Chain Coalition
US-China Business Council
Vinyl Institute
Virginia Association of Chain Drug Stores
Virginia Retail Federation
Virginia-DC District Export Council (VA-DC DEC)
Washington Retail Association
Water Quality Association
Window and Door Manufacturers Association
World Pet Association, Inc. (WPA)