



Submission of the

**U.S. Chamber of Commerce**

for the

**Proposed Modification of Action Pursuant to Section 301:  
China's Acts, Policies, and Practices Related to  
Technology Transfer, Intellectual Property, and  
Innovation**

Docket Number: USTR-2018-0026

August 17, 2018

The U.S. Chamber of Commerce, the world’s largest business organization representing the interests of more than three million businesses and organizations of all sizes, sectors, and regions, appreciates the opportunity to once again comment on actions by the United States related to the Section 301 investigation of China's laws, policies, practices, or actions related to technology transfer, intellectual property, and innovation.

Many of our members derive significant value from U.S.-China commercial engagement. The U.S. Chamber of Commerce is committed to working constructively towards building mutually beneficial ties and realizing the full potential of our relationships. Nevertheless, the U.S. Chamber has been consistent in expressing our concerns over many years regarding China’s ongoing intellectual property rights violations, forced technology transfers, and state interventions. These policies are resulting in harm to many U.S. companies, workers, consumers, and our competitiveness. In addition to advocating the elimination of policies that act to coerce technology transfers, and on behalf of those firms and workers who are adversely affected, the U.S. Chamber has long urged China to adopt systemic reforms that go beyond limited actions to gradually open select industries—and for the United States to align its own policies to those we seek in China—including by:

- Adopting a “negative list” approach to restricting foreign ownership of Chinese enterprises, limited to a carefully defined and narrow list of specific exceptions for sensitive sectors comparable in number and scope to U.S. restrictions;
- Dramatically curtailing state financial support and regulation that distorts market competition across numerous sectors in China and globally, including under guiding frameworks such as Made in China 2025, and establishing guardrails on excessive provincial and municipal investment in strategic sectors to limit unintended development of overcapacity in such sectors;

- Adjusting “secure and controllable” and other technology policies that discriminate against foreign information communication technology (ICT) companies to ensure such policies are as least trade-restrictive as possible; and
- Establishing a presumption that all categories of data can be transferred across borders without restriction, subject only to a narrowly defined national security exemption.

Notwithstanding our serious concerns about Chinese policies and practices and our alignment with many of the findings of the Administration’s Section 301 investigation to date, we reiterate our strong opposition to the Administration’s imposition of unilateral tariffs as a policy response to the challenges posed by China’s approach to technology transfers, intellectual property, and innovation. With \$50 billion in tariffs now in effect and the continuing absence of a coherent strategy to address China’s harmful practices, the U.S. Chamber believes now is the time to hold serious discussions with China to identify solutions and forestall further disruptions to the livelihood of all Americans. USTR’s proposed tariffs on an additional \$200 billion of Chinese imports dramatically expands the harm to American consumers, workers, businesses, and the economy. Moreover, the tariffs will not effectively address concerns that the U.S. Trade Representative’s Office (USTR) identified in its Section 301 report. The number of written submissions to USTR and in-person testimony opposing the Administration’s tariffs speaks volumes about the damage that additional tariffs will do. Instead of achieving the Administration’s desired effect, tariffs will prove to be counterproductive for the following reasons:

**Tariffs are hidden, regressive taxes that are being paid by U.S. businesses and consumers, paradoxically harming U.S competitiveness.**

- According to a study from the National Retail Federation and the Consumer Technology Association, current tariffs on \$50 billion of Chinese imports coupled with retaliation by China, will reduce gross domestic product by nearly \$3 billion and destroy 134,000 American jobs. The Federal Reserve Bank of Atlanta recently found that 60 percent of firms surveyed plan to reassess their capital expenditure plans because of tariff concerns.
- Given comparative advantages of other markets, it is highly unlikely that significant production of imported goods subject to tariffs would move back to the United States, but would instead migrate to other jurisdictions and thus have negligible impact on the overall U.S. trade deficit.
- Meanwhile, tariffs on products in USTR's proposed determination will in fact have a significant, adverse impact on a broad range of sectors across the U.S. economy, especially for information communication technology and medical technology companies as well as logistics companies that are heavily dependent on consumption of petroleum.
- When viewed in combination with tariffs already imposed on \$50 billion in imports from China, the proposed tariffs on \$200 billion of imports will increase the cost of nearly every vital part and component used in U.S. ICT services and manufacturing operations. These tariffs threaten the entire ICT ecosystem that underpins the U.S. economy, harming U.S. leadership in innovation and critical technology sectors as well as jeopardizing hundreds of thousands of jobs. If these tariffs are imposed, the potential harm to U.S. consumers, small businesses, the economy and the ICT industry will be profound.
- According to CompTIA, the U.S. tech sector employed 11.5 million people in 2017 and paid wages twice the national average. The sector also produced roughly 10

percent of the United States' total economic output. These contributions to the American economy are at risk from the proposed tariffs.

- Products grouped under the harmonized tariff schedule (HTS) code for transmission devices (8517.62.00) are key to Internet connectivity. Transmission devices enable machines to connect with one another—the most fundamental element of the Internet. For businesses, this includes an array of technical equipment such as optical transceivers and line cards. For consumers, this means connected devices in the home such as routers, modems, set-top boxes, streaming devices for televisions, smart watches, and fitness trackers. The imposition of 25% tariffs on these products will not only increase Internet access costs for American consumers, it will also undermine U.S. economic competitiveness globally as foreign competitors gain a cost advantage in key export markets.
- Printed circuit board assemblies (8473.30.11) include most of the core inputs for equipment used in data centers and other technical infrastructure, including computers, servers, phones, and nearly all electronic devices. They are low value-added commoditized inputs on which American firms rely to perform higher value-added processes, such as testing of servers, in the U.S. Taxing these components will make it far more difficult to build and operate data centers in the U.S. This would threaten the \$32.5 billion in average economic activity they bring to their communities and could massively erode U.S. leadership in cloud technologies, forecasted to be a \$300 billion market by 2020.
- Leading logistics companies rely on a complex system of energy procurement to efficiently transport goods across the globe. However, USTR's proposed tariffs on a broad range of petroleum products will have a tangible, detrimental impact on logistics companies' abilities to account for how increased energy costs affect their transportation networks. As the cost of fuel rises, logistics companies will be forced to raise prices or lose money. The cost of fuel not only impacts logistics

companies themselves, but also negatively affects shipping companies and downstream customers as well. Higher petroleum costs cause product price inflation due to the critical role that logistics companies play within globalized supply chains means. This will affect every aspect of production and transportation along the value chain.

- Tariffs on consumer goods like bikes and bike parts would also negatively impact manufacturers that assemble bikes in the United States. Some bikes require over 40 individual imported parts. Tariffs on these parts would make U.S. manufacturing uncompetitive and drive up the price of bikes for children and families across the United States. Complete bicycles are already subject to an 11 percent tariff. Adding an additional 25 percent will increase costs and reduce demand for bikes, and will also affect downstream purchases for products such as helmets, lights, tubes, tires, and bags. While consumers in the U.S. purchase approximately 14 million bicycles annually, there unfortunately is no other sourcing option available outside of China with the supply chain and capacity to produce this volume of low-cost bikes effectively. Moreover, bicycles produced for the mass market are a low-technology, high-volume enterprise. They do not involve the types of sensitive intellectual property or innovative technology that is the primary concern of the Section 301 investigation.
- We are also concerned about application of tariffs on medical technologies and the corresponding impact on public health and U.S. competitiveness. Imposing an import tax on medical technology could be disruptive to U.S. patient access in some areas, especially if the tariff were to be imposed for a lengthy period. When a 25 percent tax is introduced on medical technologies, those costs have to be absorbed somewhere—by the manufacturer, the distributor, the customer (hospital/lab), or the patient. In the U.S. healthcare system—with payments for medical technology largely coming indirectly from insurance companies, Medicare,

and out-of-pocket patient expenses—manufacturers have very limited ability to pass on cost increases. A 25 percent tax would put pressure on the U.S. healthcare system and could force the industry to cut costs to compensate in areas such as R&D and jobs right here at home.

- Annex 1 of this submission includes a list of products (broken down by HTS code) about which we have already heard concerns from American businesses regarding increased costs and disrupted supply chains resulting from this round of proposed tariffs. We expect that this list will only continue to grow as more businesses realize the negative impacts that will result from these new tariffs. We recommend not moving forward with this tariff proposal.

**U.S. tariffs, together with Chinese retaliation, are disrupting global trade and supply chains, further damaging American businesses, workers, farmers, ranchers and investors.**

- U.S. exports of goods to China have grown by 86 percent over the last decade, while exports to the rest of the world have grown by only 21 percent. That growth is now threatened as China is retaliating against U.S. tariffs, leading to billions in losses for American workers, farmers, and manufacturers who rely on the ability to export their crops and products to China for their livelihoods.
- In the ongoing trade dispute with China, American farmers have already become some of the first casualties of retaliation. According to a study by Farmers for Free Trade, the tariff impacts for U.S. almond, walnut, pork, wine, cherry, and many other commodity producers—totaling \$2.6 billion in exports to China in 2017—resulting from China’s retaliation against U.S. steel and aluminum tariffs are significant.
- Now U.S. farmers, ranchers, and food producers are enduring significant retaliatory actions from China in response to U.S. tariffs already levied against \$50 billion of

imports. Roughly 40 percent of China's retaliatory tariffs to date have targeted agriculture and food products, causing the value of farm goods exports to drop 5.3 percent in July. After two rounds of tariff retaliation, USDA has reported zero weekly export sales of pork to China (one of our largest pork export markets) several times in recent weeks. The U.S. Bureau of Labor Statistics reports that soybean prices have dropped 14.1 percent and are facing record high stockpiles largely as a result of Chinese retaliation

- U.S. auto manufacturers also face stiff retaliation. China recently took the long-awaited step of cutting tariffs on imports of automobiles, but additional retaliation against U.S. auto exports offset the cuts for U.S. manufacturers. This gave European and Japanese carmakers a price advantage in the world's largest auto market.
- Further retaliation on \$60 billion of U.S. goods imported by China is sure to ensue in the face of USTR's current proposed determination against \$200 billion in imports from China. The impacts of follow-on retaliation will be felt broadly across the U.S. economy by companies large and small that export to, source from, and operate in China—all to the advantage of non-U.S. foreign competitors selling to China. Proposed retaliatory tariffs on LNG exports to China, for example, are already threatening U.S. LNG terminals conceived on the basis of consistent demand from China—and are further opening the door for competitors from Qatar, Australia, and other nations.
- Supply chain disruptions are a likely outcome of qualitative retaliation by the Chinese government. However, products that have met rigorous quality control and compliance requirements to be a part of U.S. manufacturing supply chains cannot be easily replaced, particularly for specialized parts or for products for which global supply is already capacity constrained. Placing tariffs on those industrial parts for which non-Chinese alternatives are not available or feasible is



already driving up U.S. production costs and impairing the competitiveness of U.S. businesses and their workers. Tariffs on critical manufacturing inputs are prompting businesses to locate production facilities outside the United States, undermining the U.S. economy, jobs, and exports, as well as the health of the U.S. supplier base.

- Because China is the second largest economy in the world and an important market for U.S. businesses, many American companies have established wholly-owned facilities there, in part to more effectively penetrate the Chinese market. Putting tariffs on manufactured inputs made in those U.S.-owned facilities is hurting the affected U.S. businesses—as well as their U.S. facilities, workers, and suppliers, who rely on competitive access to them—while generating no meaningful leverage on China to reform its trade and investment policies.
- U.S. services exports to China surpassed \$50 billion for the first time in 2016, the most recent complete year of available data. China has committed to open certain areas of its services market, including financial services, to U.S. firms. Imposition of unilateral tariffs by the United States has increased the possibility that retaliatory Chinese actions would limit the ability of U.S. service providers in liberalized areas to access this large and growing market.

**Unilateral tariff strategies have no record of historical success and have always led to unintended consequences:**

- President George W. Bush’s tariffs on steel resulted in 200,000 job losses and \$4 billion in lost wages in 2002.
- President Obama’s tariffs on tires imported from China resulted in 2,500 job losses and cost American consumers \$1.1 billion in 2011.

- The Smoot-Hawley Tariff Act of 1930 helped fuel the Great Depression, and President Nixon's 10 percent import surcharge contributed to the stagflation of the 1970s.
- New tariffs on steel and aluminum are projected to cost consumers \$3.2 billion per year and result in 18 job losses for every one job gained.

**Imposition of tariffs is negating gains, at least in part, for American workers from U.S. tax reform and deregulation.**

- Since President Trump's election, the U.S. economy has made tremendous progress.
- The current and proposed tariffs and the ongoing trade war puts at risk the economic momentum achieved through the Administration's tax and regulatory reforms, and undermine the Administration's commitment to drive the U.S. economy to over 3 percent growth or continue to create jobs.

There are better alternatives to address China's policies and practices that would not have the same adverse impacts on U.S. consumers, businesses, and local communities or undermine the benefits of the tax reform. In particular, it is critically important that the Administration work constructively with like-minded partners to address common concerns with China's trade and investment policies. Imposition of unilateral tariffs by the Administration is splitting the United States from its allies, hindering joint action to effectively address shared challenges, and ensuring that non-U.S. companies fill the vacuum left by displaced American companies, farmers and ranchers as China retaliates against U.S. tariffs. Notwithstanding frustration regarding China's tariff and non-tariff barriers, China is an important market for U.S. companies. U.S. exports to China contribute to U.S. growth and jobs. The Administration has attempted to assure Americans that it has a strategy to resolve trade frictions with China without excessive

collateral damage to U.S. economic interests. However, these assurances lack the coherence that would provide comfort to those businesses, farms, and workers whose livelihoods are being put at risk. In particular, the conflation of valid concerns related to intellectual property co-optation raised in the current 301 investigation with unrelated concerns regarding the bilateral trade deficit muddy the waters and obscure the way forward to resolve these trade frictions with China.

The U.S. Chamber supports the Trump Administration's focus on China's industrial policies and unfair trade practices, but tariffs are not the answer. The time is now for serious bilateral discussions that can identify solutions and forestall unintended impacts. We urge the Administration to work with the business community and like-minded allies to resolve the real concerns raised by China's policies and actions.

**ANNEX 1: PRIORITY LIST OF PRODUCT CATEGORIES FOR REMOVAL FROM TARIFF LIST**

<u>Sector</u>	<u>HTSUS Subheading</u>	<u>Description</u>
Consumer technology, ICT & Semiconductors	2804.61.00	SILICON CONTAINING BY WEIGHT NOT LESS THAN 99.99 PERCENT OF SILICON
	3701.99.60	PHOTOGRAPHIC PLATES AND FILM, NESOI, IN THE FLAT, SENSITIZED, UNEXPOSED, OF ANY MATERIAL OTHER THAN PAPER, PAPERBOARD OR TEXTILES
	3705.00.00	PHOTOGRAPHIC PLATES AND FILM, EXPOSED AND DEVELOPED, OTHER THAN CINEMATOGRAPHIC FILM
	3818.00.00	CHEMICAL ELEMENTS DOPED FOR USE IN ELECTRONICS, IN THE FORM OF DISCS, WAFERS ETC., CHEMICAL COMPOUNDS DOPED FOR ELECTRONIC USE
	3923.10.20	BOXES AND SIMILAR ARTICLES FOR THE CONVEYANCE OR PACKING OF SEMICONDUCTOR WAFERS, MASKS OR RETICULES OF SUBHEADINGS 3923.10 OR 8485.90
	5911.90.00	TEXTILE PRODUCTS AND ARTICLES, OF A KIND USED IN MACHINERY OR PLANTS FOR TECHNICAL USES, SPECIFIED IN NOTE 7 TO CHAPTER 59, NESOI
	6909.11.20	PORCELAIN OR CHINA CERAMIC MACHINERY PARTS
	7017.10.30	FUSED QUARTZ REACTOR TUBES AND HOLDERS DESIGNED FOR INSERTION INTO DIFFUSION AND OXIDATION FURNACES FOR SEMICONDUCTOR WAFER PRODUCTION
	7020.00.30	QUARTZ REACTOR TUBES AND HOLDERS DESIGNED FOR INSERTION INTO DIFFUSION AND OXIDATION FURNACES FOR SEMICONDUCTOR WAFER PRODUCTION, NESOI
8471.50.01	PROCESSING UNITS OTHER THAN THOSE OF SUBHEADING 8471.41 AND 8471.49, NESOI	

Sector	HTSUS Subheading	Description
Consumer technology, ICT & Semiconductors (continued)	8471.70.50	ADP MAGNETIC DISK DRIVE STORAGE UNITS, DISK DIA. N/OV 21 CM, NESOI, NOT ENTERED WITH THE REST OF SYSTEM
	8471.80.10	CONTROL OR ADAPTER UNITS FOR AUTOMATIC DATA PROCESSING MACHINES NOT ENTERED WITH REST OF A SYSTEM
	8473.30.11	PRINTED CIRCUIT ASSEMBLIES, NOT INCORPORATING A CATHODE RAY TUBE, OF THE MACHINES OF 8471
	8473.30.51	PARTS AND ACCESSORIES OF THE ADP MACHINES OF HEADING 8471, NOT INCORPORATING A CRT, NESOI
	8504.40.60	POWER SUPPLIES SUITABLE FOR PHYSICAL INCORPORATION INTO AUTOMATIC DATA PROCESSING MACHINES OR UNITS THEREOF OF HEADING 8471
	8504.40.95	STATIC CONVERTERS (FOR EXAMPLE, RECTIFIERS)
	8517.62.00	MACHINES FOR THE RECEPTION, CONVERSION AND TRANSMISSION OR REGENERATION OF VOICE, IMAGES OR OTHER DATA, INCLUDING SWITCHING AND ROUTING APPARATUS
	8517.69.00	OTHER APPARATUS FOR TRANSMISSION OR RECEPTION OF VOICE, IMAGES, OR OTHER DATA, INCLUDING APPARATUS FOR COMMUNICATION IN A WIRED OR WIRELESS NETWORK
	8523.52.00	SEMICONDUCTOR MEDIA "SMART CARDS"
	8523.59.00	SEMICONDUCTOR MEDIA NESOI
	8525.80.30	TELEVISION CAMERAS, NESI
	8534.00.00	PRINTED CIRCUITS, WITHOUT ELEMENTS (OTHER THAN CONNECTING ELEMENTS) FITTED THEREON
8537.10.91	OTHER BOARDS, PANELS, CONSOLES, DESKS, CABINETS, ETC., EQUIPPED WITH APPARATUS FOR ELECTRIC CONTROL, FOR A VOLTAGE NOT EXCEEDING 1,000, NESI	

<u>Sector</u>	<u>HTSUS Subheading</u>	<u>Description</u>
Consumer technology, ICT & Semiconductors  (continued)	8544.42.20	INSULATED ELECTRIC CONDUCTORS NESI, 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
	8547.90.00	ELECTRICAL CONDUIT TUBING AND JOINTS THEREFOR, OF BASE METAL LINED WITH INSULATING MATERIAL; INSULATING FITTINGS FOR ELECTRICAL GOODS NESOI
Consumer and Retail Goods	2008.30.48	MANDARIN ORANGES IN CANS
	2309.10.00	RAWHIDE FOR PETS
	3305.90.00	HAIR CARE
	3307.90.00	OTHER BATH PREP
	4201.00.30	DOG LEASHES, DOG COLLARS
	4201.00.60	CAT LEASHES, PET COSTUMES
	4202.12.21	HARD LUGGAGE
	4202.12.81	LUGGAGE, TOTE BAGS, DUFFLE BAGS, HANDBAGS
	4202.22.15	TRAVEL BAGS, HANDBAGS
	4202.22.45/81	HANDBAGS
	4202.92.31	BACKPACKS
	4810.99.10	ROLLED WRAPPING PAPER
	4811.90.80	ROLLED WRAPPING PAPER
	7321.11.60	GAS GRILLS
	7009.92.10	MAKE UP MIRRORS
	8508.11.00	VACUUM CLEANERS
	8509.90.55	TOOTHBRUSH REPLACEMENT HEADS
	8510.90.10	ELECTRIC RAZORS
	8415.10.30	AIR CONDITIONERS
	8544.42.20	HDMI CABLES, VIDEO CABLES, EXTENSION CORDS, AUXILIARY CORDS
	8712.00.15	BICYCLES
	9401.40.00	FUTONS
	9401.61.40	TODDLER SEATS
	9401.79.00	CHILD HIGH CHAIRS
	9401.80.40	PATIO FURNITURE
	9401.80.60	INFANT AND CHILD CAR SEATS
	9403.60.80	WOODEN FURNITURE
	9403.89.60	INFANT AND CHILD PACK AND PLAY, PATIO FURNITURE
	9405.40.84	ELECTRIC LAMPS, LIGHT FIXTURES OTHER

Sector	HTSUS Subheading	Description
Medical Technology	3307.90.00	PERFUMED BATH SALTS AND OTHER BATH PREPARATIONS: OTHER
	3401.11.50	SOAP; ORGANIC SURFACE-ACTIVE PRODUCTS AND PREPARATIONS FOR USE AS SOAP, IN THE FORM OF BARS, CAKES, MOLDED PIECES OR SHAPES, WHETHER OR NOT CONTAINING SOAP; ORGANIC SURFACE-ACTIVE PRODUCTS AND PREPARATIONS FOR WASHING THE SKIN, IN THE FORM OF LIQUID OR CREAM AND PUT UP FOR RETAIL SALE, WHETHER OR NOT CONTAINING SOAP; PAPER, WADDING, FELT AND NONWOVENS, IMPREGNATED, COATED OR COVERED WITH SOAP OR DETERGENT: OTHER
	3401.19.00	SOAP; ORGANIC SURFACE-ACTIVE PRODUCTS AND PREPARATIONS FOR USE AS SOAP, IN THE FORM OF BARS, CAKES, MOLDED PIECES OR SHAPES, WHETHER OR NOT CONTAINING SOAP; ORGANIC SURFACE-ACTIVE PRODUCTS AND PREPARATIONS FOR WASHING THE SKIN, IN THE FORM OF LIQUID OR CREAM AND PUT UP FOR RETAIL SALE, WHETHER OR NOT CONTAINING SOAP; PAPER, WADDING, FELT AND NONWOVENS, IMPREGNATED, COATED OR COVERED WITH SOAP OR DETERGENT: OTHER
	3923.21.00	BATHS, SHOWER BATHS, SINKS, WASHBASINS, BIDEETS, LAVATORY PANS, SEATS AND COVERS, FLUSHING CISTERNS AND SIMILAR SANITARY WARE, OF PLASTICS: OF POLYMERS OF ETHYLENE
	3923.30.00	CARBOYS, BOTTLES, FLASKS AND SIMILAR ARTICLES
	3923.50.00	STOPPERS, LIDS, CAPS AND OTHER CLOSURES
	3923.90.00	BOXES, CASES, CRATES AND SIMILAR ARTICLES: OTHER
	3926.20.10	SHUTTERS, BLINDS (INCLUDING VENETIAN BLINDS) AND SIMILAR ARTICLES AND PARTS THEREOF: SEAMLESS
	3926.20.40	ARTICLES OF APPAREL AND CLOTHING ACCESSORIES (INCLUDING GLOVES, MITTENS AND MITTS): OTHER

Sector	HTSUS Subheading	Description
Medical Technology (continued)	3926.20.90	ARTICLES OF APPAREL AND CLOTHING ACCESSORIES (INCLUDING GLOVES, MITTENS AND MITTS): OTHER
	3926.90.45	GASKETS, WASHERS AND OTHER SEALS
	4008.21.00	OF NONCELLULAR RUBBER: PLATES, SHEETS AND STRIP
	4015.19.05	ARTICLES OF APPAREL AND CLOTHING ACCESSORIES (INCLUDING GLOVES, MITTENS AND MITTS), FOR ALL PURPOSES, OF VULCANIZED RUBBER OTHER THAN HARD RUBBER: OTHER MEDICAL
	4015.19.10	ARTICLES OF APPAREL AND CLOTHING ACCESSORIES (INCLUDING GLOVES, MITTENS AND MITTS), FOR ALL PURPOSES, OF VULCANIZED RUBBER OTHER THAN HARD RUBBER: OTHER MEDICAL: OTHER SEAMLESS
	4202.92.45	TRAVEL, SPORTS AND SIMILAR BAGS: WITH OUTER SURFACE OF TEXTILE MATERIALS: OF VEGETABLE FIBERS AND NOT OF PILE OR TUFTED CONSTRUCTION: OTHER
	4803.00.20	CELLULOSE WADDING
	4818.20.00	HANDKERCHIEFS, CLEANSING OR FACIAL TISSUES AND TOWELS
	4818.90.00	HANDKERCHIEFS, CLEANSING OR FACIAL TISSUES AND TOWELS
	4819.20.00	FOLDING CARTONS, BOXES AND CASES, OF NON-CORRUGATED PAPER OR PAPERBOARD
	4819.50.40	CARTONS, BOXES, CASES, BAGS AND OTHER PACKING CONTAINERS, OF PAPER, PAPERBOARD, CELLULOSE WADDING OR WEBS OF CELLULOSE FIBERS; BOX FILES, LETTER TRAYS AND SIMILAR ARTICLES, OF PAPER OR PAPERBOARD OF A KIND USED IN OFFICES, SHOPS OR THE LIKE: OTHER
	4821.10.20	PAPER AND PAPERBOARD LABELS OF ALL KINDS, WHETHER OR NOT PRINTED: PRINTED: PRINTED IN WHOLE OR IN PART BY A LITHOGRAPHIC PROCESS



<u>Sector</u>	<u>HTSUS Subheading</u>	<u>Description</u>
Medical Technology (continued)	4821.10.40	PAPER AND PAPERBOARD LABELS OF ALL KINDS, WHETHER OR NOT PRINTED: PRINTED: PRINTED IN WHOLE OR IN PART BY A LITHOGRAPHIC PROCESS: OTHER
	4821.90.20	PAPER AND PAPERBOARD LABELS OF ALL KINDS, WHETHER OR NOT PRINTED: PRINTED: PRINTED IN WHOLE OR IN PART BY A LITHOGRAPHIC PROCESS: OTHER
	4823.90.86	OTHER
	5601.21.00	WADDING OF TEXTILE MATERIALS AND ARTICLES THEREOF: OF COTTON
	5603.13.00	NONWOVENS, WHETHER OR NOT IMPREGNATED, COATED, COVERED OR LAMINATED: WEIGHING MORE THAN 70 G/M2 BUT NOT MORE THAN 150 G/M2
	5603.14.90	NONWOVENS, WHETHER OR NOT IMPREGNATED, COATED, COVERED OR LAMINATED: WEIGHING MORE THAN 150 G/M2: OTHER
	5603.92.00	NONWOVENS, WHETHER OR NOT IMPREGNATED, COATED, COVERED OR LAMINATED: WEIGHING MORE THAN 25 G/M2 BUT NOT MORE THAN 70 G/M2
	5603.93.00	NONWOVENS, WHETHER OR NOT IMPREGNATED, COATED, COVERED OR LAMINATED: WEIGHING MORE THAN 70 G/M2 BUT NOT MORE THAN 150 G/M2
	5603.94.90	NONWOVENS, WHETHER OR NOT IMPREGNATED, COATED, COVERED OR LAMINATED: WEIGHING MORE THAN 150 G/M2: OTHER
	5806.31.00	NARROW WOVEN FABRICS, OTHER THAN GOODS OF HEADING 5807; NARROW FABRICS CONSISTING OF WARP WITHOUT WEFT ASSEMBLED BY MEANS OF AN ADHESIVE (BOLDUCS): OTHER WOVEN FABRICS: OF COTTON (229)
6505.00.01	HAIR-NETS	

Sector	HTSUS Subheading	Description
Medical Technology (continued)	6505.00.80	HATS AND OTHER HEADGEAR, KNITTED OR CROCHETED, OR MADE UP FROM LACE, FELT OR OTHER TEXTILE FABRIC, IN THE PIECE (BUT NOT IN STRIPS), WHETHER OR NOT LINED OR TRIMMED; HAIR-NETS OF ANY MATERIAL, WHETHER OR NOT LINED OR TRIMMED: NOT IN PART OF BRAID
	6505.00.90	HAT FORMS, HAT BODIES AND HOODS OF FELT, NEITHER BLOCKED TO SHAPE NOR WITH MADE BRIMS; PLATEAUX AND MANCHONS (INCLUDING SLIT MANCHONS), OF FELT: OTHER
	7318.14.50	SCREWS, BOLTS, NUTS, COACH SCREWS, SCREW HOOKS, RIVETS, COTTERS, COTTER PINS, WASHERS (INCLUDING SPRING WASHERS) AND SIMILAR ARTICLES, OF IRON OR STEEL:
	7318.15.60	SCREWS, BOLTS, NUTS, COACH SCREWS, SCREW HOOKS, RIVETS, COTTERS, COTTER PINS, WASHERS (INCLUDING SPRING WASHERS) AND SIMILAR ARTICLES, OF IRON OR STEEL: HAVING SHANKS OR THREADS WITH A DIAMETER OF 6 MM OR MORE
	7318.15.80	SCREWS, BOLTS, NUTS, COACH SCREWS, SCREW HOOKS, RIVETS, COTTERS, COTTER PINS, WASHERS (INCLUDING SPRING WASHERS) AND SIMILAR ARTICLES, OF IRON OR STEEL: HAVING SHANKS OR THREADS WITH A DIAMETER OF 6 MM OR MORE
	7318.22.00	SCREWS, BOLTS, NUTS, COACH SCREWS, SCREW HOOKS, RIVETS, COTTERS, COTTER PINS, WASHERS (INCLUDING SPRING WASHERS) AND SIMILAR ARTICLES, OF IRON OR STEEL: OTHER WASHERS
	7324.90.00	SANITARY WARE AND PARTS THEREOF, OF IRON OR STEEL: OTHER, INCLUDING PARTS

Sector	HTSUS Subheading	Description
Medical Technology (continued)	7615.20.00	TABLE, KITCHEN OR OTHER HOUSEHOLD ARTICLES AND PARTS THEREOF, OF ALUMINUM; POT SCOURERS AND SCOURING OR POLISHING PADS, GLOVES AND THE LIKE, OF ALUMINUM; SANITARY WARE AND PARTS THEREOF, OF ALUMINUM: SANITARY WARE AND PARTS THEREOF
	8302.41.60	BASE METAL MOUNTINGS, FITTINGS AND SIMILAR ARTICLES SUITABLE FOR FURNITURE, DOORS, STAIRCASES, WINDOWS, BLINDS, COACHWORK, SADDLERY, TRUNKS, CHESTS, CASKETS OR THE LIKE; BASE METAL HAT RACKS, HAT-PEGS, BRACKETS AND SIMILAR FIXTURES; CASTORS WITH MOUNTINGS OF BASE METAL; AUTOMATIC DOOR CLOSERS OF BASE METAL; AND BASE METAL PARTS THEREOF: OF IRON OR STEEL, OF ALUMINUM OR OF ZINC
	8413.20.00	HAND PUMPS, OTHER THAN THOSE OF SUBHEADING 8413.11 OR 8413.19
	8504.40.95	STATIC CONVERTERS: OTHER
	8504.50.80	OTHER INDUCTORS: OTHER
	8510.20.90	HAIR CLIPPERS: OTHER
	8510.90.40	PARTS OF HAIR CLIPPERS: OTHER PARTS OF HAIR CLIPPERS
	8523.49.40	OPTICAL MEDIA: FOR REPRODUCING REPRESENTATIONS OF INSTRUCTIONS, DATA, SOUND, AND IMAGE, RECORDED IN A MACHINE READABLE BINARY FORM, AND CAPABLE OF BEING MANIPULATED OR PROVIDING INTERACTIVITY TO A USER, BY MEANS OF AN AUTOMATIC DATA PROCESSING MACHINE; PROPRIETARY FORMAT RECORDED DISCS
	8544.42.20	OTHER ELECTRIC CONDUCTORS, FOR A VOLTAGE NOT EXCEEDING 1,000 V: OF A KIND USED FOR TELECOMMUNICATIONS
	8544.42.90	OTHER ELECTRIC CONDUCTORS, FOR A VOLTAGE NOT EXCEEDING 1,000 V: OTHER

Sector	HTSUS Subheading	Description
Medical Technology (continued)	8716.80.50	TRAILERS AND SEMI-TRAILERS; OTHER VEHICLES, NOT MECHANICALLY PROPELLED; AND PARTS THEREOF: OTHER
	9001.90.40	OPTICAL FIBERS AND OPTICAL FIBER BUNDLES; OPTICAL FIBER CABLES OTHER THAN THOSE OF HEADING 8544; SHEETS AND PLATES OF POLARIZING MATERIAL; LENSES (INCLUDING CONTACT LENSES), PRISMS, MIRRORS AND OTHER OPTICAL ELEMENTS, OF ANY MATERIAL, UNMOUNTED, OTHER THAN SUCH ELEMENTS OF GLASS NOT OPTICALLY WORKED: LENSES
	9013.80.90	LIQUID CRYSTAL DEVICES NOT CONSTITUTING ARTICLES PROVIDED FOR MORE SPECIFICALLY IN OTHER HEADINGS; LASERS, OTHER THAN LASER DIODES; OTHER OPTICAL APPLIANCES AND INSTRUMENTS, NOT SPECIFIED OR INCLUDED ELSEWHERE IN THIS CHAPTER; PARTS AND ACCESSORIES THEREOF: OTHER
	9017.80.00	MICROMETERS, CALIPERS AND GAUGES: OTHER INSTRUMENTS
	9025.90.06	HYDROMETERS AND SIMILAR FLOATING INSTRUMENTS, THERMOMETERS, PYROMETERS, BAROMETERS, HYGROMETERS AND PSYCHROMETERS, RECORDING OR NOT, AND ANY COMBINATION OF THESE INSTRUMENTS; PARTS AND ACCESSORIES THEREOF: THERMOMETERS AND PYROMETERS, NOT COMBINED WITH OTHER INSTRUMENTS: PARTS AND ACCESSORIES
	9013.80.90	LIQUID CRYSTAL DEVICES NOT CONSTITUTING ARTICLES PROVIDED FOR MORE SPECIFICALLY IN OTHER HEADINGS; LASERS, OTHER THAN LASER DIODES; OTHER OPTICAL APPLIANCES AND INSTRUMENTS, NOT SPECIFIED OR INCLUDED ELSEWHERE IN THIS CHAPTER; PARTS AND ACCESSORIES THEREOF: OTHER
	9017.80.00	MICROMETERS, CALIPERS AND GAUGES: OTHER

Sector	HTSUS Subheading	Description
Medical Technology (continued)	9025.90.06	HYDROMETERS AND SIMILAR FLOATING INSTRUMENTS, THERMOMETERS, PYROMETERS, BAROMETERS, HYGROMETERS AND PSYCHROMETERS, RECORDING OR NOT, AND ANY COMBINATION OF THESE INSTRUMENTS; PARTS AND ACCESSORIES THEREOF: PARTS AND ACCESSORIES
Petroleum Products	2709.00.10	PETROLEUM OILS AND OILS FROM BITUMINOUS MINERALS, CRUDE, TESTING UNDER 25 DEGREES A.P.I.
	2709.00.20	PETROLEUM OILS AND OILS FROM BITUMINOUS MINERALS, CRUDE, TESTING 25 DEGREES A.P.I. OR MORE.
	2710.12.15	LIGHT OIL MOTOR FUEL FROM PETROLEUM OILS AND BITUMINOUS MINERALS (O/THAN CRUDE) OR PREPS. 70%+ BY WT. FROM PETROLEUM OILS.
	2710.12.18	LIGHT OIL MOTOR FUEL BLENDING STOCK FROM PETROLEUM OILS & BITUMINOUS MINERALS (O/THAN CRUDE) OR PREP 70%+ BY WT. FROM PETROLEUM OILS.
	2710.12.25	NAPHTHAS (EXC. MOTOR FUEL/MTR FUEL BLEND. STOCK) FR PETROLEUM OILS & BITUMIN MINERALS (O/THAN CRUDE) OR PREPS 70%+ BY WT. FR PETROLEUM OILS.
	2710.12.90	LIGHT OILS AND PREPARATIONS FROM PETROLEUM OILS & OILS FROM BITUMINOUS MIN. OR PREPS 70%+ BY WT. FROM PETRO. OILS OR BITUM. MIN., NESOI.
	2710.19.06	DISTILLATE AND RESIDUAL FUEL OIL (INCLUDING BLENDS) DERIVED FROM PETROLEUM OR OILS FROM BITUMINOUS MINERALS, TESTING <25 DEGREES A.P.I.
	2710.19.11	DISTILLATE AND RESIDUAL FUEL OIL (INCLUDING BLENDS) DERIVED FROM PETROLEUM OILS OR OIL OF BITUMINOUS MINERALS, TESTING 25 DEGREE A.P.I. OR >.
	2710.19.16	KEROSENE-TYPE JET FUEL FROM PETROLEUM OILS AND OILS OF BITUMIN MINERALS (O/THAN CRUDE) OR PREPS. 70%+ BY WT. FROM PETROLEUM OILS.

<u>Sector</u>	<u>HTSUS Subheading</u>	<u>Description</u>
Petroleum Products (continued)	2710.19.24	KEROSENE MOTOR FUEL (NOT JET) FROM PETRO OILS AND BITUMIN MINERALS (O/THAN CRUDE) OR PREPS. 70%+ BY WT. FROM PETROLEUM OILS.
	2710.19.90	PETROLEUM OILS & OILS FROM BITUMINOUS MINERALS OR PREPS NESOI 70%+ BY WT. FROM PETROLEUM OILS OR BITUM. MIN., NOT WASTE, NESOI.
	2711.19.00	LIQUEFIED PETROLEUM GASES AND OTHER GASEOUS HYDROCARBONS, NESOI.
	2711.29.00	PETROLEUM GASES AND OTHER GASEOUS HYDROCARBONS, EXCEPT NATURAL GAS.
	2713.11.00	COKE, PETROLEUM, NOT CALCINED.
	2713.12.00	COKE, PETROLEUM COKE, CALCINED.
	2713.20.00	PETROLEUM BITUMEN.
	2713.90.00	RESIDUES (EXCEPT PETROLEUM COKE OR PETROLEUM BITUMEN) OF PETROLEUM OILS OR OF OILS OBTAINED FROM BITUMINOUS MATERIALS.
	2715.00.00	BITUMINOUS MIXTURES BASED ON NATURAL ASPHALT, NATURAL BITUMEN, PETROLEUM BITUMEN, MINERAL TAR OR MINERAL TAR PITCH.
	2901.10.40	SATURATED ACYCLIC HYDROCARBON (NOT ETHANE, BUTANE, N-PENTANE OR ISOPENTANE), DERIVED IN WHOLE OR PART FROM PETROLEUM, SHALE OIL OR NATURAL GAS.
	2901.10.50	SATURATED ACYCLIC HYDROCARBON (NOT ETHANE, BUTANE, N-PENTANE OR ISOPENTANE), NOT DERIVED IN WHOLE OR PART PETROLEUM, SHALE OIL OR NATURAL GAS.
	2901.29.10	UNSATURATED ACYCLIC HYDROCARBONS, NESOI, DERIVED IN WHOLE OR IN PART FROM PETROLEUM, SHALE OIL OR NATURAL GAS.
	2901.29.50	UNSATURATED ACYCLIC HYDROCARBONS, NESOI, NOT DERIVED IN WHOLE OR IN PART FROM PETROLEUM, SHALE OIL OR NATURAL GAS.
	3304.99.10	PETROLEUM JELLY PUT UP FOR RETAIL SALE.

Sector	HTSUS Subheading	Description
Petroleum Products (Continued)	3403.11.20	PREPARATIONS FOR THE TREATMENT OF TEXTILE MATERIALS, CONTAINING 50 BUT NOT OVER 70 PERCENT OR MORE BY WEIGHT OF PETROLEUM OILS.
	3403.11.40	PREPARATIONS FOR THE TREATMENT OF TEXTILE MATERIALS, CONTAINING LESS THAN 50 PERCENT BY WEIGHT OF PETROLEUM OILS.
	3403.11.50	PREPARATIONS FOR THE TREATMENT OF LEATHER, FURSKINS, OTHER MATERIALS NESOI, CONTAINING LESS THAN 70% PETROLEUM OR BITUMINOUS MINERAL OILS.
	3819.00.00	HYDRAULIC BRAKE FLUIDS AND TRANSMISSION FLUIDS CONT. LESS THAN 70% BY WEIGHT OF PETROLEUM OILS, OR BITUMINOUS MINERAL OILS.
	3824.99.48	MIXTURES THAT ARE IN WHOLE OR IN PART OF HYDROCARBONS DERIVED IN WHOLE OR IN PART FROM PETROLEUM, SHALE OIL OR NATURAL GAS.
	3826.00.10	BIODIESEL NOT CONTAINING PETROLEUM OR BITUMINOUS OIL.
	3826.00.30	BIODIESEL CONTAINING <70% PETROLEUM OR BITUMINOUS OIL.