



United States Council for International Business (USCIB) Comments on Proposed Determination of Action Pursuant to Section 301: China’s Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Docket No. USTR-2018-0005

May 11, 2018

The United States Council for International Business (USCIB) welcomes the opportunity to provide comments and recommendations on the Proposed Determination of Action Pursuant to Section 301 on China’s acts, policies, and practices related to technology transfer, intellectual property, and innovation. USCIB promotes open markets, competitiveness and innovation, sustainable development and corporate responsibility, supported by international engagement and regulatory coherence. Its members include top U.S.-based global companies and professional services firms from every sector of our economy, with operations in every region of the world. As the U.S. affiliate of the International Chamber of Commerce, the International Organization of Employers and the Business and Industry Advisory Committee to the OECD, USCIB has a unique global network through which it provides business views to policy makers and regulatory authorities worldwide, and works to facilitate international trade and investment.

USCIB and its members are very concerned about the potential unintended negative consequences the proposed tariffs are likely to have, affecting many sectors vital to the U.S. economy and jobs. We understand and appreciate that U.S.-China economic relations are complex and multifaceted, and American business holds a direct and important stake in this relationship and in its success. China’s emergence as one of the world’s largest economies makes it clear that its practices and policies have an increasing impact on its trading partners. With \$578.6 billion in total goods trade in 2016, China is the largest goods trading partner of the United States, and China was the third largest export goods market in 2016 for the United States. In addition, U.S. foreign direct investment (FDI) in China was \$13.8 billion in 2016, with the ICT sector alone encompassing \$4.34 billion.

China can be a challenging market for U.S. companies to navigate. The ongoing intellectual property rights violations, forced technology transfer requirements, and state interventions harm U.S. companies, workers, consumers, and competitiveness. Made in China 2025 is certainly an indication that China plans on further advancing in developing their high-tech industries, such as robotics, advanced information technology, aviation, and new energy vehicles, with the eventual goal of global dominance in those industries through uncompetitive means such as subsidies. While this unfair advantage to Chinese companies in this space is a legitimate threat to U.S. leadership in innovation and high-tech, continued engagement in the Chinese market is also very important for U.S. companies in terms of their ability to be globally competitive. USCIB members are very concerned that these proposed tariffs will stifle the U.S. economy, and not achieve the important goal of changing China’s behavior in the space of emerging technologies and intellectual



property rights. China's threat of retaliation further exacerbates uncertainties caused by this proposed action. Rather than create more opportunities for U.S. business, sweeping tariffs will stifle U.S. agriculture, goods, and services exports and raise costs for businesses and consumers.

USCIB applauds the Administration for also looking at alternative approaches, such as initiating a WTO dispute by requesting consultations with the Government of China regarding certain specific aspects of China's technology regulations considered in the investigation. It is important for the Administration to address these issues with a broad view, working collectively with U.S. industry, Congress, and our trading partners, to adequately address China's unfair trade practices and get China to be WTO compliant. In addition to engaging the WTO process, this should include developing a strategy with clearly defined objectives, direct negotiating mechanism with the Chinese, targeted deliverables, and deadlines with measurable results. The Administration should also coordinate in various available forums with like-minded trading partners who are similarly afflicted by China's actions on intellectual property rights, forced technology transfer, and discriminatory industrial policies.

If the government does proceed with the strategy of imposing tariffs, there are several important concerns we would like to raise, to alert the Administration to the consequences of moving forward on imposing tariffs on such a comprehensive list of products. While tariffs affect most sectors, as explained in further detail below, these proposed tariffs pose a unique challenge to industrial inputs, which represent over 80 percent of the proposed Section 301 tariffs. Tariffs on industrial goods are especially problematic because they represent not just a tax on U.S. consumers, as all tariffs do, but also represent a tax on U.S. manufacturers and workers, and on the products they export.

Tariffs on aerospace, machinery and information technology (IT) parts and other advanced technologies can undermine the most competitive sectors of American manufacturing, driving up production costs in the United States, impacting U.S. manufacturing employment, and making U.S. manufacturers less competitive against global rivals.

- Tariffs on industrial parts imported into the United States could even have the unintended consequence of prompting manufacturers to move final production outside of the United States.

USCIB urges the Administration to use this public comment period to listen to USCIB members and other U.S. stakeholders who explain how they will be directly affected by the proposed tariffs. It is critical that the Administration exclude from its tariffs particularly those products that cannot feasibly be replaced by non-Chinese sources, where the harm of potential tariffs would fall more on U.S. businesses, workers, and exports than on Chinese entities. Hurting American exporters cannot be the outcome of a process designed to level the playing field in China.

USCIB understands that in drawing up its tariff list, the Administration looked at trade data to try to minimize the damage to the United States. But we also know that many firms have company- or product-specific information that was not available in the national-level data the Administration reviewed. There are a number of such scenarios where alternative non-Chinese products might



not be available or feasible, and in those circumstances, a product should be exempted from the proposed tariff.

- For example, a U.S. business may know that a particular product or technology is only available in China. China is the second largest economy in the world and the largest manufacturing economy in the world. We cannot ignore that China may have some unique capabilities, at the product level, that U.S. businesses need to tap in order to remain globally competitive.
- Or a U.S. business might know that while there exist alternative, non-Chinese sources of supply of a particular product, either in the United States or in other markets, those alternative suppliers already face capacity constraints and cannot support new demand.
- Finally, a U.S. business may in fact own the production facility in China where a particular product on the tariff list is made. The Administration has stated its goal in drawing up this tariff list was to put the negative impact of tariffs on those Chinese businesses that have benefited from China's forced technology transfer and other unfair practices. But putting tariffs on industrial products made at a U.S.-owned facility doesn't hurt Chinese businesses – it hurts that U.S. company as well as its U.S. workers and its U.S. suppliers who need those parts to continue making world-class manufactured goods in the United States.

For other products, alternative non-Chinese sources of supply may be available but would take time to be qualified or certified for use in the supply chain.

- For some products, importers can fairly easily shift suppliers from one quarter to the next.
- But for industrial parts the process is often much longer and more complex. Qualifying to join a U.S. manufacturer's supply chain is a multi-step process that can take up to three years.
- That process can be even longer if the part requires Federal certification – e.g., from the FAA or FDA.
- When a U.S. business provides evidence that locating a qualified alternative supplier for a given product on the tariff list will take a number of years, the Administration must be prepared to defer the implementation of the tariff on that product. Otherwise, immediate imposition of the 25% tariff, before any alternative can be qualified, will simply be a direct hit to U.S. businesses' profitability and competitiveness.
- If U.S. manufacturers are compelled to pay the tariff during the time it takes to develop alternative sources of supply competitors in Europe, Japan and elsewhere will immediately gain a significant advantage in global markets.

Additionally, in those instances where a Chinese product on the proposed tariff list contains significant U.S. content, the product should be excluded from the tariff list, or at the very least, the tariff should be assessed on the Chinese value net of the U.S. content.

Finally, USCIB members believe it is critical that duty drawback be available for exported products. Many of the inputs covered by the proposed Section 301 tariffs are incorporated in products made in the United States that are then exported around the world. Unless duty drawback is available for exported products, U.S. exporters will, through these tariffs, face a significant cost



disadvantage in competing against foreign products in international markets, undermining U.S. exporters, the U.S. workers employed at their facilities, and the many U.S. suppliers – many of them small and medium sized businesses – that also supply those affected exports.

USCIB members have worked hard to review the impact of these proposed tariffs on their own operations. Most U.S. businesses hope these important issues can be resolved without having to resort to tariffs. Particularly where U.S. businesses can demonstrate that the imposition of a tariff on a particular product from China would disproportionately harm U.S. manufacturing competitiveness, and jobs and exports in the United States, the Administration must be prepared to amend its proposed tariff list, or delay the imposition of that tariff, to reflect that information. Tariffs are a blunt tool with many unintended consequences on U.S. businesses. They will significantly impact U.S. companies' ability to export and create important jobs in the United States. They will also negatively impact U.S. customers, increasing competitiveness in the United States for foreign competitors. The Administration's proposed tariff list was drawn up without significant input from the U.S. business or manufacturing community. The public comment process is the principal means to solicit information from U.S. businesses. Therefore, the Administration must use this process to ensure that its actions in this China 301 process do not inadvertently harm some of the most competitive sectors of the U.S. economy, and the hundreds of thousands of American jobs that depend on them. Tariffs should only be used as leverage toward a negotiated outcome and should not be imposed while negotiations are ongoing. The following outlines specific tariff lines and concerns our members have with their inclusion on the tariff list. USCIB therefore recommends these products be taken off the tariff list:

Hard-Disk and Solid-State Drives (Harmonized Tariff Schedule of the U.S. (HTSUS) subheadings 8471.70.40, 8471.70.60, and 8471.70.90), and Parts and Accessories of printed circuit assemblies (HTSUS subheading 8473.30.20)

U.S. manufacturers of high-technology products who rely on imported industrial inputs to support jobs in the United States will see their input costs increase due to tariffs. Imported hard drives and parts and accessories of printed circuit assemblies are essential components in technology products manufactured in the United States, such as servers. The imposition of tariffs will represent a tax on these U.S. manufacturers, workers, and on the products they build and export. This will potentially make these products more expensive, raising the price of finished goods and negatively impacting U.S. jobs as foreign competitors gain market share.

Hard-disk and solid-state drives (HDDs and SSDs) are essential components in cutting-edge downstream high-tech products manufactured in the United States, such as servers. The imposition of 25 percent tariffs of these key inputs will have a significant negative impact on the U.S. manufacturers of these products and provide a cost advantage to their foreign competitors located in China. They will also put U.S. intellectual property (IP) at risk, as the U.S. manufacturers that would incur the tariffs have sited their production in the United States in part to ensure that the IP associated with the products remains in the United States. Moreover, because the manufacturers of the HDDs and SSDs themselves are not Chinese companies – they are American, Korean and Japanese – the tariffs will create negligible incentives for the Chinese government to address the



concerns that are the subject of the Section 301 investigation, even as they harm economic activity in the United States.

Information available indicates that about 95% of motherboard parts, including printed circuit assemblies (HTSUS subheading 8473.30.20) originate in China. While some other countries have the capability to produce enterprise class motherboard parts, current supply from those countries could not meet U.S. companies' demand.

Key Consumer Products: Flat screen televisions (HTSUS subheading 8528.72.64), water filters and parts (HTSUS subheading 8421.21.00 and HTSUS subheading 8421.99.00), air purifiers (HTSUS subheading 8421.39.80), scanners (HTSUS subheading 8471.60.80), flash drives (HTSUS subheading 8471.70.60), video projectors (HTSUS subheading 8528.71.10), handheld radios (HTSUS subheading 8525.60.10), portable generators (HTSUS subheading 8502.11.00), remote controls (HTSUS subheading 8526.92.50), vacuum sealers (HTSUS subheading 8422.30.91), ink cartridges (HTSUS subheading 8443.99.25)¹, mini fridges and water coolers (HTSUS subheading 8418.69.01), and thermostats (HTSUS subheading 9032.10.00).

Tariffs on consumer products will mean that working families will pay more for everyday products, negating gains for American consumers from U.S. tax reform. One estimate suggests that the price of ink cartridges and flat screen televisions made in China would each increase around 23 percent after the tariffs are applied.²

Four categories of consumer products that will be particularly affected if tariffs are imposed, resulting in increased costs for consumers and causing losses to the industry, are televisions (TVs), monitors, batteries, and water filters and parts.

- TVs³
 - U.S. consumer prices for TVs imported from China would jump by 23 percent, cumulatively forcing consumers to pay \$711 million more for TVs than they do today in the first year after the tariffs are applied
 - This will cause consumers to cut back on TV purchases by nearly 8 percent (7.8 percent)

¹ Other tariff lines the study considered: HTSUS subheadings 8443.99.20, 8443.99.45, 8443.99.50

² Estimated Impacts of Proposed Tariffs on Imports from China: Televisions, Monitors, Batteries and Printer Cartridges. Trade Partnership Worldwide. 11 April 2018. Available at: http://www.cta.tech/CTA/media/policyImages/China301Tariffs_TV_s_Monitors_Cartridges_Batteries.pdf

³ HTSUS subheadings 8528.71.10, 8528.71.30, 8258.72.08, 8258.72.16, 8528.72.32, 8528.72.48, 8528.72.52, 8528.72.56, 8528.72.62, 8528.72.64, 8528.72.80, 8528.72.97



- Monitors⁴
 - U.S. consumer prices for monitors imported from China would jump by 23.5 percent, cumulatively forcing consumers to pay \$172 million more for monitors than they do today in the first year after the tariffs are applied
 - This will cause consumers to cut back on monitor purchases by 5.4 percent
- Batteries⁵
 - U.S. consumer prices for batteries imported from China would jump by 23.8 percent, cumulatively forcing consumers to pay \$24 million more for batteries than they do today in the first year after the tariffs are applied
 - This will cause consumers to cut back on battery purchases by 1.6
- Water filters and parts⁶
 - The typical end-users of these products are single-family households and small businesses, and the proposed tariff could cause prices of these products to increase up to 25%. For example, in the water softener market, this could result in some cases in a price increase to consumers of \$650 or more per unit. In the drinking water systems market, this could result in some cases in a price increase to consumers of \$250 or more per unit.

Applying the figures above:

- A TV set made in China that costs \$250 today would cost \$308 after the tariffs are applied (a 23% / \$58 price increase).
- A TV set made in China that costs \$500 today would cost \$615 after the tariffs are applied (a 23% / \$115 price increase).
- A PC monitor made in China that costs \$100 today would cost \$124 (a 23.5% / \$24 increase).
- A PC monitor made in China that costs \$200 today would cost \$247 after the tariffs are applied (a 23.5% / \$47 increase).

If these proposed tariffs are applied in September of this year, factory shipment revenues of TVs in the United States would drop \$396 million in 2018 from what was originally forecasted in January 2018. Moreover, if the tariffs continue through 2019, factory shipment revenues of TVs in the United States would drop \$883 million from what was originally forecasted in January 2018.

⁴ HTSUS subheadings 8528.49.10, 8528.49.25, 8528.49.30, 8528.49.40, 8528.49.50, 8528.49.65, 8528.49.70, 8528.49.75, 8528.59.23, 8528.59.25, 8528.59.33, 8528.59.45, 8528.59.60

⁵ HTSUS subheadings 8506.40.10, 8506.40.50, 8506.50.00, 8506.60.00, 8506.90.00, 8507.30.80, 8507.90.40, 8507.90.80

⁶ HTSUS subheadings 8421.21.00 and 8421.99.00



Technology Filters (HTSUS subheading 8541.60.00)

An example of unintended consequences, U.S.-based technology innovators will accrue millions in additional tariffs on the import of filter and filter technologies. The technology filters (surface acoustic wave (SAW) and bulk acoustic wave (BAW)) classified under HTSUS subheading 8541.60.00 support the wide range of frequency bands being deployed in networks across the globe. The proposed tariff will effectively advantage Asian competitors creating similar filter technologies vis-à-vis U.S. innovators and is unlikely to motivate changes to China's current treatment of intellectual property as outlined in the Section 301 efforts.

LiDAR (HTSUS subheading 9015.80.20) / Radar (HTSUS subheading 8526.10.00)

Tariffs on LiDARs and radars will cause disproportionate harm to U.S. economic interests, and to small and medium businesses in particular. They will hurt U.S. innovation and erode U.S. leadership in several strategic emerging technologies. For example, LiDARs and radars are key components in the high value-added research, development, and production of cutting-edge technologies across the automotive and broader transportation industries. Unimpeded access to LiDAR and radar components is therefore essential to the continued global competitiveness and success of American industry and manufacturing. By contrast, tariffs on LiDARs and radars will hamstring U.S. innovation and allow foreign competitors to pull ahead in key strategic technologies.

These proposed tariffs on LiDARs and radars will also harm small and medium U.S. businesses. While LiDARs and radars represent one set of components in the high value-added development and production of many advanced technologies, these processes also involve sourcing other key components from domestic small and medium businesses. By increasing the cost of the overall development and production processes, tariffs on LiDARs and radars will therefore push producing firms to reduce purchases from domestic small and medium suppliers and/or increase outsourcing to foreign suppliers.

Thermostats (HTSUS subheading 9032.10.00):

Tariffs on thermostats will hurt U.S. economic interests and have numerous unintended consequences.

- Tariffs will punish the U.S. consumer, imposing a double burden of (1) higher prices on a consumer necessity, and (2) higher energy bills because consumers will be less able to afford energy-efficient smart thermostats.
- Tariffs will hurt U.S. innovation. Much of the design and technology in smart thermostats is developed in the United States (high value input), and will push consumers to non-smart thermostats with less U.S. value-add.



- Tariffs will hurt utilities who depend on usage of smart thermostats to meet their mandatory energy efficiency targets and improve grid stability.
- Tariffs will hurt the retailers and small business installers who sell and install smart thermostats by increasing prices and depressing demand.

In addition, tariffs on thermostats are unlikely to address China's efforts to force technology transfer. The research and development and software behind smart thermostats are largely developed in the United States. Moreover, the contract manufacturers used by many U.S. smart thermostat companies are not headquartered in China such that tariffs are unlikely to force China to reconsider its practices.

Finally, it would not be practicable for consumers to avoid the tariffs by purchasing smart thermostats produced outside of China. Most U.S. and third country manufacturers of smart thermostats assemble their products in China and have no alternative production locations. As a result, the proposed tariffs risk depressing demand for these products, which could negatively impact the growth of this advanced technology sector in which U.S. companies have been leads up to now.

The following are HTSUS subheadings of industrial parts used in U.S. manufacturing, for which tariffs would do disproportionate harm to U.S. manufacturing, jobs and exports for reasons outlined above.

- 8402.90.00.10 Parts of steam- or other vapor-generating boilers (heat exchangers)
- 8402.90.00.90 Parts of steam- or other vapor-generating boilers (ducts, shrouds, casings, etc.)
- 8411.91.90.85 Aircraft turbine parts
- 8411.99.90.85 Parts of gas turbines; nonaircraft gas turbines parts
- 8412.31.00.80. Pneumatic power engines and motors
- 8413.81.00.40 Pumps for liquids, not fitted with a measuring device
- 8413.91.90.80 Assembled motors, pumps, seals
- 8419.50.50.00 Heat exchange units
- 8421.99.00.40 Parts of machinery and apparatus for filtering or purifying water
- 8481.40.00.00 Safety or relief valves
- 8481.90.90.60 Valve bodies
- 8481.90.90.81 Steel forgings for valves and pneumatic engines
- 8481.90.90.85 Other parts for valves and pneumatic engines
- 8483.40.90.00 Gears and gearing
- 8483.50.90.40 Other parts for transmission shafts, incl pulleys
- 8483.90.30.00 Parts of bearing housings and plain shaft bearings
- 8484.20.00.00 Mechanical seals
- 8501.53.40.80 Electric motors and generators, exceeding 75 kW but under 149.2 kW
- 8501.53.80.40 Other electric motors and generators, not exceeding 373 kW
- 8532.25.00.80 Other printed circuit boards used in locomotives
- 8607.19.12.00 Wheels and parts thereof



- 8607.19.90.00 Other parts for wheels and axles
- 8607.91.00.00 Other parts of locomotives
- 8803.30.00.30 Other parts of airplanes or helicopters for use in civil aircraft (engine mounts, gearbox parts, etc.)
- 9018.12.00.00 Ultrasonic scanning apparatus
- 9018.19.55.00 Patient monitoring systems
- 9018.19.95.60 Electro-diagnostic apparatus parts and accessories; anesthetic instruments parts and accessories
- 9022.12.00.00 Computed tomography apparatus
- 9022.14.00.00 X-ray apparatus for medical, surgical, or veterinary uses
- 9022.90.25.00 Other parts and accessories of apparatus based on the use of X-rays
- 9022.90.60.00 Other parts and accessories of apparatus based on the use of X-rays



ANNEX

The following are all of the products addressed in our submission, as described in the Annex of the Notice of Determination and Request for Public Comment published in the Federal Register on April 6, 2018 (83 Fed. Reg. 14906).

<u>HTS subheading</u>	<u>Product Description</u>
8402.90.00	Parts of steam- or other vapor-generating boilers
8411.91.90	Parts of turbojets or turbopropellers other than those of subheading 8411.91.10
8412.31.00	Pneumatic power engines and motors, linear acting (cylinders)
8413.81.00	Pumps for liquids, not fitted with a measuring device, nesi
8413.91.90	Parts of pumps, nesi
8418.69.01	Refrigerating or freezing equipment nesi
8419.50.50	Heat exchange units, nesoi
8421.21.00	Machinery and apparatus for filtering or purifying water
8421.39.80	Filtering or purifying machinery and apparatus for gases, other than intake air filters for internal combustion engines or catalytic conv.
8421.99.00	Parts for filtering or purifying machinery or apparatus for liquids or gases
8422.30.91	Machinery for filling, closing, sealing, capsuling or labeling bottles, cans, boxes or other containers; machinery for aerating beverages; nesoi
8443.99.20	Parts of printer units of subheading 8443.32.10 specified in additional U.S. note 2 to this chapter
8443.99.25	Parts and accessories of printers, nesoi
8443.99.45	Parts and accessories of copying machines; nesoi
8443.99.50	Parts and accessories of other printing, copying or facsimile machines; nesoi
8471.60.80	Optical scanners and magnetic ink recognition devices not entered with the rest of a ADP system
8471.70.40	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
8471.70.60	ADP storage units other than magnetic disk, not in cabinets for placing on a table, etc., not entered with the rest of a system
8471.70.90	ADP storage units other than magnetic disk drive units, nesoi, not entered with the rest of a system



8473.30.20	Parts and accessories of the ADP machines of heading 8471, not incorporating a CRT, parts and accessories of printed circuit assemblies
8481.40.00	Safety or relief valves for pipes, boiler shells, tanks, vats or the like
8481.90.90	Parts of taps, cocks, valves and similar appliances for pipes, boiler shells, tanks, vats or the like, nesi
8483.40.90	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements entered separately
8483.50.90	Pulleys, including pulley blocks, nesi
8483.90.30	Parts of bearing housings and plain shaft bearings, nesi
8484.20.00	Mechanical seals
8501.53.40	AC motors nesi, multi-phase, of an output exceeding 75 kW but under 149.2 kW
8501.53.80	AC motors nesi, multi-phase, of an output exceeding 150 kW
8502.11.00	Electric generating sets with compression-ignition internal-combustion piston engines, of an output not exceeding 75 kVA
8506.40.10	Silver oxide primary cells and primary batteries having an external volume not exceeding 300 cubic cm
8506.40.50	Silver oxide primary cells and primary batteries having an external volume exceeding 300 cubic cm
8506.50.00	Lithium primary cells and primary batteries
8506.60.00	Air-zinc primary cells and primary batteries
8506.90.00	Parts of primary cells and primary batteries
8507.30.80	Nickel-cadmium storage batteries, other than of a kind used as the primary source of power for electric vehicles
8507.90.40	Parts of lead-acid storage batteries, including separators therefor
8507.90.80	Parts of storage batteries, including separators therefor, other than parts of lead-acid storage batteries
8525.60.10	Transceivers
8526.10.00	Radar apparatus
8526.92.50	Radio remote control apparatus other than for video game consoles
8528.49.10	Incomplete or unfinished color video monitors, presented w/o a display device, not incorp. VCR or player
8528.49.25	Non-high definition color video monitors, nonprojection type, w/CRT, video display diagonal not over 34.29 cm, not incorp. VCR or player
8528.49.30	Non-high definition color video monitors, nonprojection, w/CRT, video display diag. ov 34.29 cm but n/ov 35.56 cm, not incorp. VCR or player



85284940	Non-high definition color video monitors, nonprojection type, w/CRT, video display diagonal over 35.56 cm, not incorporating VCR or player
8528.49.50	Non-high definition color video monitors, projection type, with cathode-ray tube, not incorporating VCR or player
8528.49.65	High definition color video monitors, nonprojection type, with cathode-ray tube, not incorporating VCR or player
8528.49.70	High definition color video monitors, projection type, with cathode-ray tube, incorporating VCR or player
8528.49.75	High definition color video monitors, projection type, with cathode-ray tube, not incorporating VCR or player
8528.59.23	Color video monitors w/flat panel screen, video display diagonal > 34.29 cm, incorporating VCR or player, not subject US note 13
8528.59.25	Color video monitors w/flat panel screen, video display diagonal n/ov 34.29 cm, not incorporate VCR or player
8528.59.33	Color video monitors w/flat panel screen, video display diagonal > 34.29 cm, not with VCR/player, not subj US note 13
8528.59.45	Color video monitors nesoi, with video display diagonal not over 34.29 cm, not incorporating VCR or player
8528.59.60	Black and white or other monochrome video monitors, other
8528.71.10	Reception apparatus for television, not designed to incorporate a video display or screen, incorporating video recording or reproducing appa
8528.71.30	TV reception printed circuit assemblies incorporating a tuner, of a kind used with ADP machines of heading 8471, nesoi
8528.72.08	Incomplete or unfinished color tv reception apparatus, presented w/o a display device, n/incorp. VCR or player
8528.72.16	Non-high def. color television reception app., nonprojection, w/CRT, display diag. ov 34.29 cm but n/ov 35.56 cm, incorp. VCR or player
8528.72.32	Non-high definition color television reception apparatus, nonprojection, w/CRT, video display diag. ov 35.56 cm, not incorp. a VCR or player
8528.72.48	High definition color television reception apparatus, nonprojection, with cathode-ray tube, not incorporating a VCR or player
8528.72.52	High definition color television reception apparatus, projection type, with cathode-ray tube, incorporating a VCR or player
8528.72.56	High definition color television reception apparatus, projection type, with cathode-ray tube, not incorporating a VCR or player
8528.72.62	Color television reception apparatus w/flat panel screen, video display diagonal n/ov 34.29 cm, incorporating a VCR or player
8528.72.64	Color television reception apparatus w/flat panel screen, video display diagonal over 34.29 cm, incorporating a VCR or player
8528.72.80	Color television reception apparatus nesoi, video display diagonal over 34.29 cm, incorporating a VCR or player
8528.72.97	Color television reception apparatus nesoi, video display diagonal over 34.29 cm, not incorporating a VCR or player, nesoi



8532.25.00	Dielectric fixed capacitors of paper or plastics
8541.60.00	Mounted piezoelectric crystals
8607.19.12	Parts of railway/tramway locomotives/rolling stock, wheels, whether or not fitted with axles
8607.19.90	Parts of railway/tramway locomotives/rolling stock, parts of truck assemblies for self-propelled vehicles or for non-self propelled nesoi
8607.91.00	Parts, nesoi, of railway/tramway locomotives
8803.30.00	Parts of airplanes and helicopters, nesoi
9015.80.20	Optical surveying, hydrographic, oceanographic, hydrological, meteorological or geophysical instruments and appliances, nesi
9018.12.00	Ultrasonic scanning electro-diagnostic apparatus used in medical, surgical, dental or veterinary sciences
9018.19.55	Electro-diagnostic patient monitoring systems
9018.19.95	Electro-diagnostic apparatus nesi, and parts and accessories thereof nesi
9022.12.00	Computed tomography apparatus based on the use of X-rays
9022.14.00	Apparatus based on the use of X-rays for medical, surgical or veterinary uses (other than computed tomography apparatus)
9022.90.25	X-ray generators, high tension generators, desks, screens, examination or treatment tables, chairs and similar apparatus, nesi
9022.90.60	Parts and accessories of apparatus based on the use of X-rays
9032.10.00	Automatic thermostats