



**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-2018-0026**

**September 6, 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 submitted comments on the proposed tariffs of 25 percent on \$50 billion worth of Chinese imports on May 11, 2018 for Docket No. USTR-2018-0005 as well as on the list of \$16 billion worth of Chinese imports on July 23, 2018 for Docket No. USTR-2018-0018. We are hopeful that the Section 301 exclusion process will remedy some of the potential negative consequences of the tariffs imposed on July 6, 2018 and look forward to receiving additional information on the filing process for the tariffs imposed on August 23, 2018.

USCIB and its members continue to be very concerned about the potential unintended consequences these proposed tariffs of 10 or 25 percent on \$200 billion worth of Chinese imports are likely to have, affecting many sectors vital to the U.S. economy and jobs. Particularly if USTR imposes 25 percent tariffs on this broad list of products, these tariffs will impact consumers and will severely impact U.S. competitiveness. The negative impact of such tariffs to U.S. consumers and industry appears disproportionate to the intended purpose of the 301 action. The impact on USCIB members spans several chapters of the Harmonized Tariff Schedule of the United States (HTS), including Chapters 20, 23, 29, 33, 42, 48, 56, 70, 73, 76, 79, 84, 85, 87, and 94. Goods affected include but are not limited to parts used in U.S.-made wind turbines, routers, switches, radios, digital baseband, multiplexers, splitters, switch units, smart displays and speakers, Bluetooth technology, data center products and components, standalone desktop computers, potassium sorbate, aspartame, sucralose, travel goods, handbags, and many other consumer products. The proposed tariffs on these and other goods will negatively affect the competitiveness of U.S. goods and impede American leadership in the development of innovative technologies.



While China's forced technology transfer requirements, state interventions, and other unfair trade practices harm U.S. companies, workers, consumers, and competitiveness, these sweeping tariffs endanger the U.S. economy in similar ways. While the unfair advantage to Chinese companies provided by these policies is a legitimate threat to U.S. leadership in innovation, 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. Rather than creating more opportunities for U.S. business, sweeping tariffs will stifle U.S. agriculture, goods, and services exports and raise costs for businesses and consumers. China's retaliation and threats of future retaliation further exacerbate uncertainties caused by this proposed action.

The Administration has indicated that the goal of imposing tariffs on Chinese imports is to provide leverage in its negotiations with China on its unfair trade practices. If that is the goal, then we strongly urge the Administration to engage in a dialogue with China to negotiate an outcome. This should include developing a strategy with clearly defined objectives, a 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. Tariffs should only be used as leverage toward a negotiated outcome and should not be imposed while negotiations are ongoing.

In addition, USCIB members believe it is critical that duty drawback continue to 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 continues to be 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 would also like to raise a technical concern regarding the interplay of China 301 and Harmonized Tariff Schedule of the United States (HTSUS) Chapter 98. Specifically, this concerns China origin goods that have been imported into the United States, sent to another country for repair or alteration, and are then re-imported into the United States under chapter 98. In that scenario, to avoid duplicate charges, the duties should only be assessed on the value of the repair or alteration, not on the basis of the origin of the underlying previously imported good.

USCIB members have worked hard to review the impact of these proposed tariffs on their own operations. Most U.S. businesses continue to 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.



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:

**Apple Juice (HTSUS 2009.71.00 and 2009.79.00)**

Increased costs due to the tariffs on HTSUS 2009.71.00 and 2009.79.00 would have significant adverse effects on many food and beverage companies. These additional costs could raise the price of food and beverages. With regard to apple juice, China is the top supplier of apple juice consumed in the United States. For many consumers, particularly children and the elderly, juice is one of the primary ways that they obtain their daily required serving of fruits and vegetables. Additional costs of imported juices (listed in HTSUS 2009.11.00 through HTSUS 2009.90.40) due to the tariff could put juices out of reach of some consumers and contribute to a shortfall in some key nutrients.

**Potassium Sorbate (HTSUS 2916.19.10), Sorbic Acid (HTSUS 2916.19.20), Aspartame (HTSUS 2924.29.10), Sucralose (HTSUS 2932.14.00), Saccharin and its Salts (HTSUS 2925.11.00)**

Increased costs due to tariffs on HTSUS 2916.19.10, 2916.19.20, 2924.29.10, and 2932.14.00 would have significant adverse effects on many food and beverage companies. These additional costs could increase costs of, and reduce demand for, American products. These costs could also affect the development of new and continued sourcing of existing products that include these specific food preservatives and artificial sweeteners.

For example, saccharin and its salts (HTSUS 2925.11.00) are used to manufacture a variety of products here in the United States and are essential to many U.S. companies producing downstream products domestically. Saccharin is a non-nutritive sweetener used in beverages and foods, personal care beverages and foods, personal care products such as toothpaste, table top sweeteners, and animal feeds. It is also used in metalworking fluids. This product is made in China and provides an alternative to sugar for inclusion in food stuffs and personal care products such as toothpaste. It is about 300-500 times as sweet as sucrose but has a bitter or metallic aftertaste. The majority of saccharin (over 70 percent) is produced in China although S. Korea and India possess a limited capacity. There is no major active U.S. producer of saccharin thus limiting the availability and capacity of this product if it is not sourced from China. If the 10 or 25 percent tariff is assessed on this product, the competitiveness of U.S. industry and their consumers will be negatively impacted.



### **Travel goods and handbags (HTSUS Chapter 42)**

This new list of additional tariffs on \$200 billion of Chinese imports reaches far beyond the intended counter to Made in China 2025. One example are the significant tariffs on travel goods and handbags found on the list. These costs of these tariffs would be passed on directly to the American consumer.

Examples of goods affected under this chapter are dog leashes, dog collars, cat leashes, pet costumes, hard luggage, luggage, tote bags, duffle bags, handbags, travel bags, and backpacks.<sup>1</sup>

### **Non-Woven Fabrics (HTSUS 5603.91.00)**

Non-woven fabrics classified in HTSUS 5603.91.00 should be removed from the list of products subject to 10 or 25 percent tariffs. These products are non-woven materials made from manmade fibers weighing 25 or less g/m<sup>2</sup>. It includes spun bond PET fiber manufactured from unique technology. These non-woven materials are the foundation of dryer activated fabric conditioned nonwoven substrate. The fibers are engineered to hold a coating mix during impregnation and slow the release of chemicals into the dryer at a specific rate. These factors are extremely important to the performance of the fabric.

Because of the weight needed for the dryer activated sheets, additional quantities of these rigorously qualified fibers are not available anywhere else in the world (but China). There is only one source of spun bond PET in the United States. This facility is operating at full capacity with its output fully used or consumed. Incremental U.S. production is highly unlikely because of high capital costs and the output basis weight does not work for any other purposes. Therefore, a tariff applied to this raw material simply would undermine the future growth of U.S. finished good manufacturing and employment because the importing the fiber would be cost prohibitive.

### **Augmented Reality and Virtual Reality Products, Components, and Accessories (HTSUS 8471.80.10, 8471.60.10, and 4202.19.00)**

We strongly urge USTR to remove augmented reality and virtual reality (AR/VR) products, components and accessories from the final list of products that will be subject to increased duties. The imposition of a 10-25 percent additional duty on these products would significantly impact the profitability of the innovative U.S. companies who develop and sell them, stifling their growth and undermining their ability to invest and innovate to drive the industry forward and grow U.S. market share. Industries across the U.S. are just beginning to adopt AR/VR products for use in advanced research, worker training, healthcare, commerce, communications and many other high-value economic and social uses. If duties are imposed on U.S. companies' products, competitors

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<sup>1</sup> HTSUS 4201.00.30, HTSUS 4201.00.60, HTSUS 4202.12.21, HTSUS 4202.22.15, HTSUS 4202.22.45, HTSUS 4202.22.81, HTSUS 4202.92.31



in Asia and the EU would gain a significant competitive advantage in the U.S. market that they would use to wrest industry leadership from the United States.

The duties would also have a significant negative impact on the highly-skilled U.S. workers who are employed in this nascent U.S. industry. It is a sensitive time for the industry as consumers decide whether to adopt this emerging technology. The duties would significantly raise the costs of AR/VR products, frustrating the U.S. industry's efforts to encourage adoption by reducing prices, and hurting sales. The resulting lower installed hardware base would discourage independent app developers and software designers from creating new content for the products of U.S. AR/VR companies, making it harder to compete against Asian and European products with higher sales levels and exacerbating the harm from the duties themselves.

It is not realistic for U.S. AR/VR companies to source their products from the United States or from third countries outside of China, as the necessary production facilities do not currently exist. It would take a minimum 1-2 years to establish such operations, and it would cost significant amounts of capital that U.S. companies could otherwise invest in research and development and creating additional U.S. jobs. In addition, given the cutting-edge and rapidly changing nature of AR/VR products, the resultant delay in bringing new U.S. products to the market would be extremely harmful for U.S. competitiveness. This harm, in turn, would benefit Chinese AR/VR companies, contrary to the goals of the Section 301 investigation.

**Wind Turbine Parts (HTSUS 8412.90.90, as well as 8483.40.50, 7326.90.86, and 8504.40.95)**

Tariffs on parts used in the U.S. manufacture of wind turbines would affect the cost and competitiveness of U.S. wind turbine manufacturers, undermining the ability of wind turbines made in the United States to compete with foreign-made wind turbines, and seriously harming the competitiveness of the U.S. renewable energy industry. The current global supply of these wind turbine parts and components from outside of China is insufficient to meet U.S. and other global demand over the next several years, particularly in view of U.S. regulatory incentives for wind power that will expire at the end of next year. Putting tariffs on the imports of these components from China before alternative sources of supply could be brought on line would disrupt and slow the adoption of renewable energy by U.S. power companies. This would affect billions of dollars of already planned wind power investments in the United States, and potentially affect the cost of power for American consumers.

**Postage Meters (HTSUS 8470.90.01) and Machine Parts for Postage Meters and Accessories (HTSUS 8473.29.00)**

The proposed tariffs on postage meters and their component parts would place the only U.S.-based supplier of this technology at a competitive disadvantage in the U.S. market against their primary competitors from France and Germany and would increase costs to hundreds of thousands of small businesses that use the technology to conduct transactions critical to shipping their products,



sending invoices and receiving payment for their services. The technology involved includes only the more basic elements of the equipment while the higher security components are not imported China and are only installed and activated into the equipment during the assembly process in the United States.

**Standalone Desktop Computers (HTSUS 8471.50.01) and PC components (HTSUS 8473.30.11)**

Additional tariffs targeting roughly \$17.4 billion in PC components and \$5.2 billion in desktop computers would result in the passing down of costs to consumers and businesses. Unavoidable price increases could cause consumers and businesses to delay or forgo computer purchases, adversely affecting not just the electronics industry but the broader economy.

**Smart Technology / Transmission Devices (HTSUS 8517.62.00), Digital Cameras (HTSUS 8525.80.30), Computers without a screen (HTSUS 8471.50.01), Printed Circuit Assemblies (HTSUS 8473.30.11), and key server components (HTSUS 8473.30.11, 8473.30.51, 8473.30.91, 8504.40.60, 8544.42.20, and 8537.10.91)<sup>2</sup>**

We strongly urge USTR to remove transmission devices, computers without a screen, printed circuit assemblies, and key server components from the final list of products that will be subject to increased duties. The imposition of 10-25 percent of additional duties on these products would harm U.S. consumers, cost U.S. jobs, and undermine U.S. technology companies in the fight for global leadership in the digital economy, specifically in key technological areas such as 5G telecommunications and Cloud Computing infrastructure, without addressing China's unfair trade practices related to the forced transfer of U.S. technology and intellectual property.

Goods under HTSUS 8517.62.00 include or are a part of many innovative consumer technology products where the U.S. is an industry leader – smart devices and speakers, streaming devices, smartwatches, fitness trackers, WiFi routers, and other products that U.S. consumers depend on for business, educational, healthcare, and entertainment purposes. These products represent cutting edge innovation and the future of the global economy and it is imperative for U.S. companies to remain highly competitive and innovative. Sweeping, across-the-board tariffs would put a significant drag on U.S. companies and institutions – including many small businesses – trying to manufacture connected devices in the United States, and it would put a tax on U.S. consumers seeking to connect to the Internet or use Internet-enabled technologies. To allow U.S. industry to continue to thrive in this critical area and to ensure U.S. leadership in the innovation economy (including on consumer technology, telecommunications, and telemedicine), these tariff lines should be removed.

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<sup>2</sup> Other products affected are: accessories, mouses, cables, power supplies



In addition, tariffs on goods classified under HTSUS 8471.50.01, which includes any computers without a screen, and key server components classified under HTSUS 8473.30.11 (printed circuit assemblies), 8473.30.51, and 8473.30.91 will harm the ability of U.S. companies to build data centers and lead the world on cloud technologies. The parts targeted by these tariffs cover most of the core inputs to data centers and other U.S. technical infrastructure today and those of the future. Considering that hundreds of thousands of American businesses now rely on data centers and cloud technologies to conduct day-to-day business which includes payroll, order management, and human resource systems, these increased tariffs would raise costs and risk decreasing competitiveness for a massive range of small and large businesses across the country. Additional tariffs of 10 percent or even 25 percent would raise the costs of operating infrastructure needed to maintain the cloud services used by consumers and companies from every sector of the economy, directly hitting the bottom line of every U.S. business competing in the global market place. Adding these costs will weaken U.S. technology companies' leadership in the global economy and allow foreign competitors to become the front-runners in critical industries such as Cloud Data and 5G.

Printed circuit board assemblies (PCBAs) covered by HTSUS 8473.30.11 are present within all computers, servers, and phones, as well as almost all electronic devices. U.S. government data indicates that over two thirds of all imports under this subheading come from China, with a few other low-cost regions in Asia making up the majority of the remainder. Taxing these components would make it far more difficult to build and operate data centers significantly damaging U.S. leadership on cloud technologies. At the same time, there is little relationship between the production of PCBAs and China's "Made in China" strategy.

Shifting production of PCBAs out of China will take many U.S. importers a minimum of 9-12 months, including time to locate and qualify new factories, get new assembly lines up and running, and at least three months to run reliability classification and QA testing. Setting up new transportation routes, negotiating pricing, and implementing additional logistics steps would add further time to this exercise. The entire process would also increase costs, which would ultimately be passed along to U.S. businesses and consumers that use cloud technologies. These significant costs assume very limited disruption in servicing customers. In sum, despite the significant 10 percent or 25 percent tariff, no rational U.S. Company is going to incur the very high costs and other risks raised by relocating a facility in China with an already established ecosystem of vendors and suppliers to a "green field" site in another country.

### **Routers and Switches Used in Telecom (HTSUS 8517.62.00 and 8517.69.00)**

Tariffs on HTSUS 8517.62.00 and 8517.69.00 would have significant impact on the telecom industry. Many affected products may not have alternative suppliers, depending on where the vendor manufactures. The products affected by these HS Codes are a broad spread. Anything from networking equipment to set top boxes to Wi-Fi routers and more could be affected.

Increasing costs for inputs for companies ultimately get passed on the consumers. These tariffs have a ripple effect across economic relationships hitting many unintended targets along the way.



Ultimately it is unclear how this will help the U.S. economy when leaders in the U.S. innovation economy are hit with such costs, impacting their ability to compete in the global market place.

**Radios, Digital Baseband, Multiplexers, Splitters, Switch Units, Routers (HTSUS 8517.62.00 and HTSUS 8517.69.00)**

The additional proposed tariffs on products like radios, digital baseband, multiplexers, splitters, switch units, and routers found under HTSUS 8517.62.00 and HTSUS 8517.69.00 will be in the millions of dollars for our members, if implemented. This will significantly impact the competitiveness of U.S. companies operating in these spaces. Other products include steel brackets, aluminum brackets, fan units, power supply units, filter, tower mounted amplifier units, overvoltage protection, power connectors, power distribution, battery fuse units, coaxial cables, HDMI cables, video cables, extension cords, auxiliary cords and power cables.<sup>3</sup>

<sup>3</sup>

Steel Brackets	7326.90.86
Aluminum Brackets	7616.99.51
Fan Units	8414.59.15
Power Supply Units	8504.40.85
Radio, Digital Baseband, Multiplexor, Splitter, Switch Units, Routers	8517.62.00
Filter, Tower Mounted Amplifier Units, Routers	8517.69.00
Overvoltage Protection	8531.90.30
Power Connectors	8536.69.80
Power Distribution, Battery Fuse Units	8537.10.91
Coaxial Cables	8544.20.00
HDMI cables, video cables, extension cords, auxiliary cords	8544.42.20
Power Cables	8544.42.90



**Various Consumer Products including Gas Grills (HTSUS 7321.11.60), Bicycles (HTSUS 8712.00.15), Furniture (HTSUS 9403.20.00, HTSUS 9403.60.80, HTSUS 9401.30.80, HTSUS 9401.80.40, HTSUS 9403.89.60), Futons and mattresses (HTSUS 9401.40.00, HTSUS 9404.21.00), Surge Protectors (HTSUS 8537.10.91), Paper Shredders (HTSUS 8472.90.90), Pet Products (HTSUS 7323.99.90), Pressure Washers (HTSUS 8424.30.90), Patio Furniture (HTSUS 9401.80.40), Infant and child pack and play (HTSUS 9403.89.60), Christmas Lights (HTSUS 9405.30.00), Electric Lamps / Light Fixtures (HTSUS 9405.40.84)**

Tariffs are taxes paid by the U.S. consumer in the form of higher product prices and by US businesses in the form of higher costs. The \$200 billion list includes a vast number of consumer goods that will tax American families. In addition to the products cited above, other products that are affected include food items like mandarin oranges in cans (HTSUS 2008.30.48), items for pets, including rawhide (HTSUS 2309.10.00), personal care items such as hair care and other bath prep (HTSUS 3305.90.00), make up mirrors (HTSUS 7009.92.10), toothbrush replacement heads (HTSUS 8509.90.55) and electric razors (HTSUS 8510.90.10), products for children including toddler seats (HTSUS 9401.61.40), child high chairs (HTSUS 9401.79.00), and infant and child car seats (HTSUS 9401.80.60), and other household items like rolled wrapping paper (HTSUS 4810.99.10 and 4811.90.80), vacuum cleaners (HTSUS 8508.11.00), air conditioners (HTSUS 8415.10.30), and oil-less fryers and toaster ovens (HTSUS 8516.60.40).

Additional duties on inputs into U.S. goods will get passed down to the consumer, raising prices on every day goods for Americans throughout the United States. Particularly lower end goods that rely on many inputs will not be able to sustain their supply at the current cost.

One example are bicycles. Tariffs on bikes and bike parts would negatively impact bike manufacturers, who assemble bikes in the United States. Each bike requires over 40 individual parts all of which are imported for lower end bikes. 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 cost and reduce demand for bikes, and will also affecting downstream purchases for products such helmets, lights, tubes, tires, and bags.

Consumers in the U.S. purchase approximately 14 million bicycles annually. Unfortunately, there is no other sourcing option available outside of China that has the supply chain and capacity to produce this volume of low cost mass bikes effectively. While production could shift at the margins, sourcing most entry level mass bikes from China would likely still be less expensive than shifting production, even including an additional 25 percent duty. Alternatively, we expect that even if portions of bicycle production were to shift to other countries, the vast majority of component parts would continue to be made in China. Finally, 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 are the primary concern of the Section 301 investigation.



**ANNEX**

The following are all 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 July 17, 2018 (83 Fed. Reg. 33608).

<b><u>HTUS Subheading</u></b>	<b><u>Product Description</u></b>
<b><i>SECTION IV: Prepared Foodstuffs; Beverages, Spirits, and Vinegar; Tobacco and Manufactured Tobacco Substitutes</i></b>	
2008.30.48	Mandarins (other than satsuma), prepared or preserved, nesoi
2009.71.00	Apple juice, of a Brix value not exceeding 20, unfermented
2009.79.00	Apple juice, of a Brix value exceeding 20, unfermented
2309.10.00	Dog or cat food, put up for retail sale
<b><i>SECTION VI: Products of the Chemical or Allied Industries</i></b>	
2916.19.10	Potassium sorbate
2916.19.20	Sorbic acid
2924.29.10	Acetanilide; N-acetylsulfanyl chloride; aspartame; and 2-methoxy-5-acetamino-N,N-bis(2-acetoxyethyl)aniline
2925.11.00	Saccharin and its salts
2932.14.00	Sucralose
3305.90.00	Preparations for use on the hair, nesoi
<b><i>SECTION VIII: Raw Hides and Skins, Leather, Furskins and Articles Thereof; Saddlery and Harness; Travel Goods, Handbags and Similar Containers; Articles of Animal Gut (Other Than Silkworm Gut)</i></b>	
4201.00.30	Dog leashes, collars, muzzles, harnesses and similar dog equipment, of any material
4201.00.60	Saddlery and harnesses for animals nesoi, (incl. traces, leads, knee pads, muzzles, saddle cloths and bags and the like), of any material
4202.12.21	Trunks, suitcases, vanity and attache cases and similar containers, with outer surface of plastics
4202.19.00	Trunks, suitcases, vanity cases, attache cases, occupational luggage & like containers surface of vulcanized fiber or paperboard nesoi



4202.22.15	Handbags, with or without shoulder straps or without handle, with outer surface of sheeting of plastics
4202.22.45	Handbags with or without shoulder strap or without handle, with outer surface of cotton, not of pile or tufted construction or braid
4202.22.81	Handbags with or without shoulder strap or without handle, with outer surface of MMF materials
4292.92.31	Travel, sports and similar bags with outer surface of MMF textile materials
<b><i>SECTION X: Pulp of Wood or of Other Fibrous Cellulosic Material; Waste and Scrap of Paper or Paperboard; Paper and Paperboard and Articles Thereof</i></b>	
4810.99.10	Paper & paperboard nesoi, coated with kaolin or other inorganic substances, in strips/rolls ov 15 cm wide or certain size rectangular sheets
4811.90.80	Paper, paperboard, cellulose wadding and webs of cellulose fibers, nesoi, weighing over 30 g/m2, in certain size strips, rolls or sheets
<b><i>SECTION XI: Textile and Textile Articles</i></b>	
5603.91.00	Nonwovens (not of man-made filaments), weighing not >25 g/square m, whether or not impregnated, coated, covered or laminated
<b><i>SECTION XIII: Articles of Stone, Plaster, Cement, Asbestos, Mica or Similar Materials; Ceramic Products; Glass and Glassware</i></b>	
7009.92.10	Glass mirrors (o/than rearview mirrors), framed, n/o 929 cm2 in reflecting area
<b><i>SECTION XV: Base Metals and Articles of Base Metal</i></b>	
7321.11.60	Iron or steel, nonportable non-electric domestic cook. appl. (o/th stoves or ranges) & plate warmers, for gas fuel or both gas & other fuels
7323.99.90	Iron (o/th cast)/steel (o/th tinsplate or stainless), table, kitchen (o/th cooking.) or o/household arts & part, n/coated/plated w/prec.metal
7326.90.86	Iron or steel, articles, nesoi
7616.99.51	Aluminum, articles, nesoi
<b><i>SECTION XVI: Machinery and Mechanical Appliances; Electrical Equipment; Parts Thereof; Sound Recorders and Reproducers, Television Image and Sound Recorders and Reproducers, and Parts and Accessories of Such Articles</i></b>	
8412.90.90	Parts for engines of heading 8412 other than hydrojet engines for marine propulsion
8414.59.15	Fans used for cooling microprocessors, telecommunications equipment, or computers
8415.10.30	Window or wall type air conditioning machines, self-contained
8424.30.90	Steam blasting machines and similar jet projecting machines, other than sand blasting machines; nesoi



8470.90.01	Postage-franking, ticket-issuing and similar machines nesoi, incorporating a calculating device; accounting machines
8471.50.01	Processing units other than those of subheading 8471.41 and 8471.49, nesoi
8471.60.10	Combined input/output units for automatic data processing machines not entered with the rest of a system
8471.60.90	Other input or output units of digital ADP machines, nesoi, not entered with the rest of a system
8471.80.10	Control or adapter units for automatic data processing machines not entered with rest of a system
8472.90.90	Other office machines, nesoi
8473.29.00	Parts and accessories of machines of heading 8470, nesoi
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
8473.30.91	Parts and accessories of the ADP machines of heading 8471, incorporating a CRT, nesoi
8483.40.50	Fixed, multiple and variable ratio speed changers, not imported for use with machines for making cellulosic pulp, paper or paperboard
8504.40.60	Power supplies suitable for physical incorporation into automatic data processing machines or units thereof of heading 8471
8504.40.70	Power supplies for automatic data processing machines or units thereof of heading 8471, nesoi
8504.40.85	Static converters (for example, rectifiers) for telecommunication apparatus
8504.40.95	Static converters (for example, rectifiers), nesoi
8508.11.00	Vacuum cleaners with self-contained electric motor, of a power not exceeding 1,500 W and having a dust bag or other receptacle capacity not
8509.90.55	Parts of electromechanical domestic appliances nesoi, other than housings
8510.90.10	Blades and cutting heads of shavers with self-contained electric motor
8516.60.40	Electrothermic cooking stoves, ranges and ovens (excluding microwave ovens) of a kind used for domestic purposes
8517.62.00	Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing appa
8517.69.00	Other apparatus for transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless n
8525.80.30	Television cameras, nesoi



8531.90.30	Printed circuit assemblies of electric sound or visual signaling apparatus, nesoi
8534.00.00	Printed circuits, without elements (other than connecting elements) fitted thereon
8536.69.80	Plugs and sockets for making connections to or in electrical circuits, for a voltage not exceeding 1,000 V, nesoi
8537.10.91	Other boards, panels, consoles, desks, cabinets, etc., equipped with apparatus for electric control, for a voltage not exceeding 1,000, nesoi
8544.20.00	Insulated (including enameled or anodized) coaxial cable and other coaxial conductors
8544.42.20	Insulated electric conductors nesoi, 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
<b><i>SECTION XVII: Vehicles, Aircraft, Vessels and Associated Transport Equipment</i></b>	
8712.00.15	Bicycles, not motorized, w/both wheels not over 63.5 cm in diameter
<b><i>SECTION XX: Miscellaneous Manufactured Articles</i></b>	
9401.30.80	Seats nesoi, swivel w/variable height adjustment & other than w/wooden frame (o/than of heading 9402)
9401.40.00	Seats nesoi, convertible into beds (o/than garden seats or camping equip.)
9401.61.40	Chairs nesoi, w/wooden frames (o/than teak), upholstered
9401.79.00	Seats nesoi, w/metal frame (o/than of heading 9402), not upholstered
9401.80.40	Seats nesoi, of rubber or plastics (o/than of reinforced or laminated plastics & o/than of heading 9402)
9401.80.60	Seats nesoi, o/than of wood, or w/metal frame or of rubber or plastics (o/than of heading 9402)
9403.20.00	Furniture (o/than seats) of metal nesoi, o/than of a kind used in offices
9403.60.80	Furniture (o/than seats & o/than of 9402) of wooden (o/than bentwood) nesoi
9403.89.60	Furniture (o/than seats & o/than of 9402) of materials nesoi
9404.21.00	Mattresses, of cellular rubber or plastics, whether or not covered
9405.30.00	Lighting sets of a kind used for Christmas trees
9405.40.84	Electric lamps and lighting fixtures nesoi, not of base metal