

December 18, 2020

Hon. Robert E. Lighthizer
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Re: Request for an Extension of the Comment Period on the Vietnam 301 Currency Investigation in order to Comment on U.S. Department of Treasury's Report on Macroeconomic and Foreign Exchange Policies of Major Trading Partners of the United States as Relevant to USTR's Investigation of Vietnam's Acts, Policies and Practices Related to Currency Valuation

Dear Ambassador Lighthizer,

On December 16, 2020, the U.S. Department of Treasury ("Treasury") issued a report of critical importance to the Section 301 investigation on Vietnam's acts, policies and practices related to currency valuation. See Initiation of Section 301 Investigation: Vietnam's Acts, Policies, and Practices Related to Currency Valuation, 85 Fed. Reg. 63,637 (USTR Oct. 8, 2020); see also Press Release, U.S. Dep't of the Treasury, Treasury Releases Report on Macroeconomic and Foreign Exchange Policies of Major Trading Partners of the United States (Dec. 16, 2020), <https://home.treasury.gov/news/press-releases/sm1212>. The release of this report occurred after the comment period deadline and deadline to appear at the December 29, 2020 hearing passed. We request an opportunity to determine participation in this investigation based on Treasury's December 16 report. We would ask USTR to reopen the comment period, to allow interested parties to request to appear at the hearing, and to delay the hearing and post-hearing comment deadline.

This finding could have substantial impact on the ongoing investigation. Interested parties should be given an opportunity to comment on this report to the United States Trade Representative ("USTR") prior to the conclusion of the investigation on this matter.

Our view is that the law provides that interested parties that are engaged in administrative proceedings are entitled to a meaningful opportunity to be heard both under the Administrative Procedures Act ("APA") and the Constitution. We therefore respectfully request an opportunity to comment on the highly relevant information contained in Treasury's report. We appreciate your attention to this important matter.

Please contact the undersigned with any questions.

Respectfully submitted,

Accessories Council

Retail Industry Leaders Association

American Home Furnishings Alliance

Semiconductor Industry Association

American Apparel & Footwear Association

Toy Association

Consumer Technology Association

Travel Goods Association

Council of Fashion Designers of America

U.S. Chamber of Commerce

Fashion Accessories Shippers Association

Fashion Jewelry & Accessories Trade
Association

Footwear Distributors & Retailers of America

Gemini Shippers Association

Halloween Industry Association

Hardwood Federation

Home Furnishings Association

International Wood Products Association

Juvenile Products Manufactures Association

Outdoor Industry Association

National Foreign Trade Council

National Marine Manufacturers Association

National Retail Federation

Recreational Vehicle Industry Association