



April 23, 2020

The Honorable David Johanson
Chairman
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

RE: Investigation 332-576

Dear Chairman Johanson:

Thank you for the opportunity to submit comments on trade-related information relevant to products to combat the COVID19 health crisis.

The National Foreign Trade Council (NFTC) welcomes Chairmen Grassley and Neal's request of this information, and appreciates the U.S. International Trade Commission's (ITC) willingness to promptly provide the results of this investigation to the Committees.

As detailed below, a variety of items relevant to addressing the COVID19 crisis currently face tariffs. These items include:

- Medical equipment used in COVID-19 diagnosis and treatment, Personal Protective Equipment (PPE) that directly support first responders and community workers, related medical supplies and equipment, and parts used in those products, as well as inputs to medicines;
- IT and infrastructure equipment that support hospitals and research, scientific and medical facilities;
- Products that facilitate logistics and 3D printing; and
- Products that help working families and enable work-from-home environments.

The Council believes that addressing the unique challenge posed by COVID19 requires an urgent whole-of-government response, including trade policy.

The U.S. Government has an opportunity and responsibility to fully-utilize the tools of trade policy to lower costs and strengthen the supply chains of medical supplies and other products that help patients, first responders, front-line workers, medical, research and scientific facilities, and working families respond to this unprecedented crisis.

NFTC strongly urges the U.S. Government to eliminate immediately Most-Favored Nation (MFN) tariffs on a range of product lines that are relevant to the COVID-19 crisis response. In addition, NFTC is urging the Office of the United States Trade Representative (USTR) to grant additional exclusions to the Section 301 tariffs applied to products from China on items relevant to the COVID19 response.

We hope these comments, which are based on input from NFTC's member companies, will be helpful to the ITC as it prepares its report.

MFN tariffs on products related to the COVID19 response

NFTC strongly urges the U.S. Government to eliminate immediately Most-Favored Nation (MFN) tariffs on products that are relevant to the COVID-19 crisis response, including:

HTS	Description	MFN duty
2207.10	Alcohol solution -- Undenatured, 75% ethyl alcohol	21.1cents/liter
2207.10.60.90	Alcohol solution -- Undenatured, containing by volume 80% or more ethyl alcohol	2.50%
2847.00.00	Hydrogen peroxide in bulk -- Bulk H ₂ O ₂ whether or not with solidified with urea	3.70%
3808.94	Hand sanitizer -- A liquid or gel generally used to decrease infectious agents on the hands, alcohol-based type	0-6.5%
3808.94	Other disinfectant preparations -- Put up in forms or packings for retail sale such as rubs and wipes impregnated with alcohol or other disinfectants	0-6.5%
3808.94	Hydrogen peroxide put up in disinfectant preparations for cleaning surfaces -- H ₂ O ₂ put up as cleaning solutions for surfaces or apparatus	0-6.5%
3808.94	Other chemical disinfectants "Put up in forms or packings for retail sale as disinfectants or as disinfectant preparations, containing alcohol, benzalkonium chloride solution or peroxyacids, or other disinfectants."	0-6.5%
3919.10.20	Kit Labels -- plastic, self adhesive	5.80%
3923.21.00	Biohazard Bags -- polyethylene	3%
3926.20.40	Plastic face shields (covering more than the eye area)	6.50%
3926.20.9050	Plastic Face Shields & Protective Garments made from plastic sheeting	5%
4015.19.10	Other rubber gloves (seamless)	3%
4015.19.1010	Nitrile Powdered Gloves	3%
4015.19.50	Other rubber gloves (other than seamless)	14%
5601.21.00	Swabs cotton	3.60%
6116.10.13	Knitted or crocheted gloves which have been impregnated or covered with plastics or rubber	12.50%
6116.10.17	Knitted or crocheted gloves which have been impregnated or covered with plastics or rubber	23.50%
6210.20, .30, .40, .50	Other protective garments of textiles of rubberised textile fabrics or woven fabrics that are impregnated, coated, covered or laminated (fabrics of headings 59.03, 59.06 or 59.07). Actual classification will depend on type of garment and if for males or females. Example: a unisex full body woven suit impregnated with plastics would be classified under 6210.50 - Other women's or girls' garments	3.3%-7.10%
6216.00	Textile gloves that are not knitted or crocheted	up to 23.50%
6307.90.98	Textile face-masks, without a replaceable filter or mechanical parts, including surgical masks and disposable face-masks made of non-woven textiles	7%
6307.90.9889	N95 Respirator Mask	7%
6505.00.0100	Disposable hair nets	6.40%
7014002000	Light blocking assembly for use in X-ray systems	5.00%

8419501000	Brazed aluminum plate-fin heat exchangers	4.20%
8479899499	Other machines and mechanical appliances; NSPF	2.50%
8481809005	Solenoid valves (to control the flow of gas), for use in respiratory care and anesthesia systems	2.00%
8481809035	Control valve (to control the flow of gas) for artificial breathing circuits, for use in respiratory care and anesthesia systems	2.00%
8504409540	Static converters for use in computed tomography systems	0.30%
8537109150	Panel and distribution boards (operator console) for use in computed tomography systems	2.70%
8537109170	Boards, panels, consoles, desks, cabinets and other bases (for the control or distribution of electricity), for use in X-ray, computed tomography CT), ultrasound, respiratory care and anesthesia systems	2.60%
8544110050	Other winding wire of copper; NSPF	3.50%
8544200000	Coaxial cables for use in ultrasound systems for human use	5.30%
8544429090	Insulated wire and optical cable, whether or not fitted with connectors, for use in respiratory care, anesthesia, computed tomography (CT) and X-ray systems.	2.50%
8544493080	Electrical conductor, copper, for voltage exceeding 80V but less than 600V	5.30%
8544602000	Insulated cables for voltage exceeding 1000V fitted with connectors, for overhead tube suspensions used in X-Ray systems	3.50%
8544429090	Insulated wire and optical cable, whether or not fitted with connectors, for use in respiratory care, anesthesia, computed tomography (CT) and X-ray systems.	2.50%
8544493080	Electrical conductor, copper, for voltage exceeding 80V but less than 600V	5.30%
8544602000	Insulated cables for voltage exceeding 1000V fitted with connectors, for overhead tube suspensions used in X-Ray systems	3.50%
8547108000	Cables with ferrite filters used to connect catheter probes to ultrasound systems, for use in ultrasound systems.	3.00%
8716905060	Parts for trolleys and dollies, to transport equipment within hospitals and clinics	3.10%
9022902500	Tables for use in X-ray and computed tomography systems	0.80%
9022904000	Parts and accessories of X-ray tubes	0.90%
9004.90.00	Protective spectacles and goggles	2.50%
9004.90.0000	Protective Eyewear	2.50%
9020.00.60	Gas masks with mechanical parts or replaceable filters for protection against biological agents. Also includes such masks incorporating eye protection or facial shields	2.50%

Section 301 tariffs

The U.S. Government currently applies tariffs on a range of goods from China under a Section 301 action.

NFTC is urging USTR to grant additional exclusions to the Section 301 tariffs applied to products from China on items relevant to the COVID19 response, for the following tariff lines:

Medical equipment used in COVID-19 diagnosis and treatment, PPE, and other medical supplies, equipment and parts

A number of products and equipment used to diagnose and treat COVID-19 patients and to protect medical professionals, front-line workers and consumers from COVID-19, as well as the parts and inputs used to make those products, equipment and medicines, are subject to Section 301 tariffs:

HTS Code	Description
0000.29.02.43	Para-xylene
0000.29.02.44	Meta-xylene
0000.29.17.36	Purified terephthalic acid. Para-xylene (0000290243), meta-xylene (0000290244) and purified terephthalic acid (0000291736) are key building blocks from which polyester products are made, including products in high demand amid the COVID19 crisis. These products include: bottles for water, milk, iced tea, juices and carbonated soft drinks; packaging for liquid soaps, detergents, cleaners, disinfectants and hand sanitizers; clam shell packages for fresh foods; packaging for pharmaceuticals / medicines; and fibers for the manufacture of face masks.
2207.10	Alcohol solution -- Undenatured, 75% ethyl alcohol
2207.10.60.90	Alcohol solution -- Undenatured, containing by volume 80% or more ethyl alcohol
2847.00.00	Hydrogen peroxide in bulk -- Bulk H2O2 whether or not with solidified with urea
2914.39.90.00	Benzophenone is a necessary input into U.S. production of medicines that are used for the management of patients who become critically ill due to COVID-19 including clinical syndromes such as acute respiratory distress syndrome ("ARDS") and sepsis or septic shock that the World Health Organization ("WHO") has identified as associated with COVID-19 infection.
2915.90.50.50	Trimethyl Orthoformate Tech and Trimethyl Orthoformate Bulk are necessary inputs into U.S. production of medicines that are used for the management of patients who become critically ill due to COVID-19 including clinical syndromes such as acute respiratory distress syndrome ("ARDS") and sepsis or septic shock that the World Health Organization ("WHO") has identified as associated with COVID-19 infection.
2925.19.42.00	Phthalimidopropionaldehyde is an ingredient used to make Lipitor, licensed to prevent cardiovascular disease. Emerging clinical evidence suggests that older COVID-19 patients suffering from underlying health conditions, such as hypertension, diabetes, cardiovascular disease, or chronic lung disease are at higher risk of complications from COVID-19 infection. It is important to ensure that those at-risk patients continue to have access to their medicines that are used to control their underlying disease and conditions.
3808.94	Hand sanitizer -- A liquid or gel generally used to decrease infectious agents on the hands, alcohol-based type
3808.94	Other disinfectant preparations -- Put up in forms or packings for retail sale such as rubs and wipes impregnated with alcohol or other disinfectants
3808.94	Hydrogen peroxide put up in disinfectant preparations for cleaning surfaces -- H2O2 put up as cleaning solutions for surfaces or apparatus
3808.94	Other chemical disinfectants "Put up in forms or packings for retail sale as disinfectants or as disinfectant preparations, containing alcohol, benzalkonium chloride solution or peroxyacids, or other disinfectants."
3824.99.9297	Hand Sanitizer
3919.10.20	Kit Labels -- plastic, self adhesive
3923.21.00	Biohazard Bags -- polyethylene
3926.20.10	Plastic gloves
3926.20.1010	Protective garments made from plastic sheeting
3926.20.40	Plastic face shields (covering more than the eye area)

	Tubes, Vials, Well Plates. Tubes: A test tube, also known as a culture tube or sample tube, is a common piece of laboratory glassware. Vials are often used to store medication as liquids, powders or capsules. They can also be used as scientific sample vessels; for instance, in autosampler devices in analytical chromatography. The well plate has become a standard tool in analytical research and clinical diagnostic testing laboratories. The well plate is a flat plate that looks like a tray with multiple wells that are used as small test tubes. The well plates are commonly manufactured in a 2:3 rectangular mix with 96, 384, or 1536 wells, although other cavity configurations are available. Some of the other sizes, far less common, available are 6, 24, 3456, and 9600 wells.
3926.99.10	Other rubber gloves (seamless)
4015.19.50	Other rubber gloves (other than seamless)
4818.90.00	Paper bed sheets
4821.90.20	Kit Labels -- paper, self adhesive
5601.21.00	Swabs cotton
6116.10.13	Knitted or crocheted gloves which have been impregnated or covered with plastics or rubber
6116.10.17	Knitted or crocheted gloves which have been impregnated or covered with plastics or rubber
6210.20, 30, 40, 50	Other protective garments of textiles of rubberised textile fabrics or woven fabrics that are impregnated, coated, covered or laminated (fabrics of headings 59.03, 59.06 or 59.07). Actual classification will depend on type of garment and if for males or females. Example: a unisex full body woven suit impregnated with plastics would be classified under 6210.50 - Other women's or girls' garments
6216.00	Textile gloves that are not knitted or crocheted
6307.90.98	Textile face-masks, without a replaceable filter or mechanical parts, including surgical masks and disposable face-masks made of non-woven textiles
6307.90.9889	N95 facemasks/disposable face masks
6505.00.0100	Disposable hair nets
7014.00.2000	Light blocking assembly for use in X-ray systems - used in X-ray systems, which are used for evaluation of COVID-19 and related illnesses.
7419.99.5050	Sump assembly for vaporization, for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8418.69.0180	Recirculating chillers (refrigeration units) for use in magnetic resonance (MR) systems - used in magnetic resonance imaging (MRI) machines, which are being used to assess and understand the neurologic impacts of the COVID-19 virus, including cytokine storm syndrome.
8421.19.0000	Centrifuges. A centrifuge is a laboratory device that is used for the separation of fluids, gas or liquid, based on density. Separation is achieved by spinning a vessel containing material at high speed; the centrifugal force pushes heavier materials to the outside of the vessel.
8471.50.0150	Processing units (host computers for image capture and re-construction), for use in ultrasound systems - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
8471.50.0150	Processing units (host computers for image capture and re-construction), for use in computed tomography (CT) systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8471.80.1000	Control and adapter units for use in computed tomography systems for human use - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.

8471.80.1000	Control and adapter units for use in ultrasound systems for human use - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
8481.80.9005	Solenoid valves (to control the flow of gas), for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8481.80.9035	Control valve (to control the flow of gas) for artificial breathing circuits, for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8504.40.9530	Static converters, of power output exceeding 150 W but not exceeding 500 W, for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8504.40.9540	Static converters for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8504.40.9580	Printed circuit board assemblies for use in anesthesia and respiratory care systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8523.49.2010	Prepackaged software options on digital media for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8537.10.9150	Panel and distribution boards (operator console) for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8537.10.9170	Boards, panels, consoles, desks, cabinets and other bases (for the control or distribution of electricity), for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8537.10.9170	Boards, panels, consoles, desks, cabinets and other bases (for the control or distribution of electricity), for use in X-Ray systems - used in X-ray systems, which are used for evaluation of covid-19 and related illnesses, including through portable x-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
8537.10.9170	Boards, panels, consoles, desks, cabinets and other bases (for the control or distribution of electricity), for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8537.10.9170	Boards, panels, consoles, desks, cabinets and other bases (for the control or distribution of electricity), for use in ultrasound systems - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
8544.20.0000	Coaxial cables for use in ultrasound systems for human use - used for ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
8544.42.2000	Insulated cables for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.

8544.42.2000	Insulated cables for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8544.42.9090	Insulated wire and optical cable, whether or not fitted with connectors, for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
8544.42.9090	Insulated wire and optical cable, whether or not fitted with connectors, used in overhead tube suspensions for use in X-Ray systems - used in X-ray systems, which are used for evaluation of covid-19 and related illnesses, including through portable x-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
8544.42.9090	Insulated wire and optical cable, whether or not fitted with connectors, for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8544.60.2000	Insulated cables for voltage exceeding 1000V fitted with connectors, for overhead tube suspensions used in X-Ray systems - used in X-ray systems, which are used for evaluation of covid-19 and related illnesses, including through portable x-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
8544.70.0000	Optical fiber cables for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
8547.10.8000	Cables with ferrite filters used to connect catheter probes to ultrasound systems, for use in ultrasound systems. - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
8716.90.5060	Parts for trolleys and dollies, to transport equipment within hospitals and clinics, for use in respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
9004.90.00	Protective spectacles and goggles
9018.12.0000	Ultrasonic scanning apparatuses (ultrasound systems) for human imaging Ultrasound systems are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
9018.13.0000	Parts and accessories of magnetic resonance imaging systems, excluding parts for dental or veterinary uses - used in magnetic resonance imaging (MRI) machines, which are being used to assess and understand the neurologic impacts of the COVID-19 virus, including cytokine storm syndrome.
9018.19.9560	Parts and accessories of respiratory care and anesthesia systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
9018.19.9560	Parts and accessories of patient monitoring systems - used in patient monitoring in intensive care units, including for treatment of COVID-19. Monitoring of COVID-19 patients is critical, for ventilated patients especially.
9018.19.9560	Parts and accessories for (hybrid) PET-CT and Nuclear-CT systems for human use - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
9018.19.9560	Parts and accessories of ultrasound systems for human imaging - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
9018.19.9560	Parts and accessories of magnetic resonance systems for human imaging - used in magnetic resonance imaging (MRI) machines, which are being used to assess and

	understand the neurologic impacts of the COVID-19 virus, including cytokine storm syndrome.
9018.20.0080	Parts and accessories of medical systems using ultraviolet or infrared ray apparatuses - used in medical equipment used in hospitals and other medical facilities.
9018.90.3000	Anesthetic instruments and appliances and parts and accessories for human use Anesthetic instruments -- which can be used as ventilators in emergencies, per FDA guidance -- are used in COVID-19 treatment, and are seeing increasing demand in the current situation, especially in view of ventilator capacity constraints.
9018.90.60	Extracorporeal membrane oxygenation (ECMO) "Provides prolonged cardiac and respiratory support by removing blood from the person's body and artificially removing the carbon dioxide and oxygenating red blood cells."
9018.90.60	Patient monitoring devices - Electro-diagnostic apparatus "Electrical or electronic equipment for the observation of a disease, condition or one or several medical parameters over time. This includes such devices as pulse oximeters or bedside monitoring stations used for continuous monitoring of various vital signs. (Note: this does not include devices more specifically covered elsewhere e.g. electro-cardiographs (9018.11) or electronic thermometers (9025.19).)
9018.90.75	Extracorporeal membrane oxygenation (ECMO) "Provides prolonged cardiac and respiratory support by removing blood from the person's body and artificially removing the carbon dioxide and oxygenating red blood cells."
9018.90.75	Patient monitoring devices - Electro-diagnostic apparatus "Electrical or electronic equipment for the observation of a disease, condition or one or several medical parameters over time. This includes such devices as pulse oximeters or bedside monitoring stations used for continuous monitoring of various vital signs. (Note: this does not include devices more specifically covered elsewhere e.g. electro-cardiographs (9018.11) or electronic thermometers (9025.19).)
9020.00.60	Gas masks with mechanical parts or replaceable filters for protection against biological agents. Also includes such masks incorporating eye protection or facial shields
9022.12.00.00	Computed tomography apparatuses (CT systems/scanners), excluding systems for dental or veterinary use Computed tomography systems use a rotating X-ray machine to image thin slices of the body for evaluating the progression of COVID-19 and related lung illnesses such as pneumonia.
9022.14.0000	X-Ray systems, excluding systems for dental or veterinary use X-ray systems are used for evaluation of COVID-19 and related illnesses, including through portable X-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
9022.14.0000	C-arm systems for use in surgical imaging, excluding systems for dental or veterinary use These products, typically for use in image guided surgery, can be used for traditional radiographical imaging (X-ray) when other x-ray resources are constrained due to COVID-19 usage.
9022.30.0000	Parts and accessories of X-ray tubes - used in X-ray systems, which are used for evaluation of COVID-19 and related illnesses, including through portable X-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
9022.90.2500	Power distribution units for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
9022.90.2500	Consoles and assemblies for use in computed tomography systems - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.

9022.90.2500	Tables for use in X-ray and computed tomography systems - used in X-ray and computed tomography systems, which are used for evaluation of COVID-19 and related illnesses.
9022.90.4000	Parts and accessories of X-ray tubes (described in statistical reporting number 9022904000) - used in X-ray systems, which are used for evaluation of covid-19 and related illnesses, including through portable X-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
9022.90.6000	Parts and accessories of X-ray systems, excluding systems for dental or veterinary uses - used in X-ray systems, which are used for evaluation of covid-19 and related illnesses, including through portable X-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
9025.19.80.40	Other thermometers -- For example, digital thermometers, or infrared thermometers for placing on the forehead
9025.19.8040	Digital clinical thermometers, valued not over \$11 each Note: Foreign suppliers of thermometers typically valued at under \$11 have increased dramatically in price, leading to an additional duty cost. NFTC requests this limit be lifted.
9027.80.45	COVID-19 Diagnostic Test instruments used in clinical laboratories for In Vitro Diagnosis
9030.10.0000	Instruments and apparatuses for measuring or detecting ionizing radiations for use in X-ray systems - used in X-ray systems, which are used for evaluation of COVID-19 and related illnesses, including portable X-ray used in ambulatory care settings where COVID-19 patients are located and require lung evaluation.
9032.89.4000	Parts and accessories for automatic regulating or controlling instruments for use in medical devices - used in medical equipment such as X-ray, computed tomography (CT) and magnetic resonance imaging (MRI) systems used in the diagnosis and treatment of COVID-19
9026.80.2000	Apparatus for measuring or checking the flow, level, pressure, or other variables of liquids or gases, in the use of anesthesia and respiratory care systems - used in respiratory equipment (including ventilators) and anesthesia equipment (which can be used as ventilators in emergencies, per FDA guidance), which are both used in COVID-19 treatment.
9402.90.0020	Pad (to place atop CT tables) for use as part of a computed tomography system - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
9402.90.0020	Cart for use as part of an ultrasound system - used in ultrasound systems, which are used for evaluation of COVID-19 (and related illnesses), including for thoracic, lung and cardiac evaluation.
9403.20.0090	Desks for use as part of a computed tomography system - used in computed tomography (CT) systems, which are used for evaluating the progression of COVID-19 and related lung illnesses.
9903.88.12	Other thermometers -- For example, digital thermometers, or infrared thermometers for placing on the forehead

Products to enable data storage, data centers and networked medical care, research and development

NFTC is urging USTR to exempt equipment and supplies essential for networking, data storage and data centers from China 301 tariffs to support the medical response to COVID-19. This equipment is critical to the Administration's efforts to combat the pandemic in several respects.

First, hospitals, medical facilities, research and scientific centers, and healthcare providers are relying heavily on networking equipment in their efforts to address the COVID-19 crisis. They

are using telehealth and virtual care to treat patients remotely, which helps keep patients and healthcare workers safe. They are also using networking equipment to establish "mini-data centers" at hospitals and other facilities to provide vitally important data to relevant government agencies during this time of crisis.

Second, the DHS Cybersecurity and Infrastructure Security Agency (CISA) has designated the Communications and IT sectors as critical infrastructure that are essential to combating the COVID-19 emergency. Networking equipment is also essential as part of the CISA-designated Advanced Manufacturing sector.

Third, one of the key aspects of the Administration's effort to combat COVID-19 is to flatten the curve of new infections. To achieve this objective, American workers and families are being encouraged – and in certain cases, required – to work from home. Schools are also switching to online learning in an effort to reduce infection and keep children safe. The nation's wired and wireless telecommunications networks – which depend critically on networking equipment and the power to run it – are making this possible.

HTS	Description
8412.90.9081	Wind turbine blade, To ensure stable power supply throughout and beyond the COVID-19 medical crisis and shelter-in-place requirements.
8412.90.9081	Wind turbine bedplate, To ensure stable power supply throughout and beyond the COVID-19 medical crisis and shelter-in-place requirements.
8412.90.9085	Wind turbine machined hub, To ensure stable power supply throughout and beyond the COVID-19 medical crisis and shelter-in-place requirements.
8483.40.5010	Wind turbine gearbox, To ensure stable power supply throughout and beyond the COVID-19 medical crisis and shelter-in-place requirements.
8471.50.01.50	Motherboards
8471.50.01.50	Server and Server Rack Storage
8471.70.20.00	HDD, Hard Disk Drive
8471.70.40.65	HDD, Hard Disk Drive
8471.70.60.00	Tape Drive Storage - Current exemption is limited; should be fully exempted
8473.30.11.40	DRAM, Random Access Memory
8473.30.11.40	RAM, Random Access Memory
8473.30.11.40	Printed Circuit Assemblies
8473.30.11.80	Printed Circuit Assemblies - Current exemption is limited to graphics; should be fully exempted
8473.30.51.00	Heatsink
8473.30.51.00	Parts of Servers/Engineered Systems - Current exemption is limited; should be fully exempted
8502.13.00.40	Generator
8504230041	Transformer
8504230045	Transformer
8504230080	Transformer
8504.40.60.01	PSU, Power Supply Unit
8504.40.60.07	PSU, Power Supply Unit
8504.40.60.12	PSU, Power Supply Unit
8504.40.60.18	PSU, Power Supply Unit
8504.40.85.00	PSU, Power Supply Unit
8504.40.85.00	UPS, Uninterruptible Power Supply
8517.62.00.10	Modem

8517.62.00.20	Networking equipment, including Routers, Service Racks and Switches
8517.62.00.50	Main Boards for network equipment
8517.62.00.90	Async Network Modules
8517.62.00.90	Optical Module
8517.62.00.90	Wireless NFC Module, Near Field Communication
8517.70.00.00	Chassis
8517700000	Enclosure
8523510000	SSD, Solid State Drive
8536507000	ATS, Automatic Transfer Switches
8536507000	Switch
8536700000	Adaptors- Optical Fibers
8537109120	Switchboard
8537109120	Switchgear
8537109170	rPDU, Rack Power Distribution Unit
8537200020	Switchboard
8537200020	Switchgear
8542310001	CPU, Central Processing Unit
8542310001	GPU, Graphic Processing Unit
8544200000	Coaxial Cable w/ Connector
8544422000	Telecommunication Cables
8544429090	Adaptors- Fitted with Connectors, not Optical Fibers
8544429090	Cables
8544491000	Cables
8544493040	Copper Cables
8544493080	Copper Cables
9403100040	Rack Rails and Hardware
9403908041	Cable Management

Products to support working families and enable work from home environments during the COVID19 crisis

A number of products subject to Section 301 tariffs enable a work from home environment and support working families' ability to cope with the disruptions and displacements from COVID19.

Eliminating tariffs on the products below, which encompass categories including dishwashers and washing machines, home cleaning products, pet care, home office products and supplies, and smart home technologies, would support workers and families during this difficult time.

HTS	Description
230910.00.10	Dog Food
230910.00.90	Dog Food
28112.25.00	Cat Litter
3402.20.51.00	Washing Machine Cleaner
3215119060	Ink Cartridges
3926.90.10.00	Mop Bucket
400912.00	Hose Assemblies (for washing machines, connecting tub to drain)
4802626140	Printer Paper

4818.10.00.00	Toilet Paper
6307.90.98.89	Cat and Dog Bed
6815.99.40.70	Cat Litter
8415.82.01.05	Air Conditioner
8421.39.80.15	Air Purifier
842211.00	Dishwashers
8441100000	Printers
8443992510	Ink Cartridges
845090.60	Other Washing Machine Parts, including Washing machine door lock switch, Washing machine control window panel, Washing machine clutch assemblies, Washing machine window encoder
8471609050	Computer Mouse
8471704065	Storage Drives
8471801000	Camera Links
8504406018	Power Supply
8508.11.00.00	Vacuum Cleaner
8516.29.00.30	Space Heater
8517620050	Routers
8523510000	Storage Drives
8525803010	Cameras
8525804000	Video Doorbell Cameras
8525805050	Web Cameras
8537109170	Smart Plugs
8544422000	Cables
9401308010	Desk Chairs
9401308030	Desk Chairs
960990.80.00	Coloring Set

Products relevant to logistics and 3D-printing

A number of products that facilitate logistics and 3D printing for companies face Section 301 tariffs, including:

HTS	Description
5806200090	Retention Bands
8431200000	Drive Unit components and mechanical subassemblies
8537109170	Fuse Terminal Assemblies
9403906080	Fabric Bin Arrays
9403908041	Add on Hooks
8525804000	Camera
8479909496	Full gate
8479899499	Gate
8543709960	Pedestal
84433210	Printer
39169030	Monofilament

About NFTC

NFTC is a business association dedicated to making America more competitive in the global economy by ensuring the adoption of forward-looking tax and trade policies, by strengthening global rules and by opening foreign markets to U.S. products and services. Our strong support for these objectives, and our belief that their fulfillment is essential to our members' success in a globalized economy, have been unwavering for decades. We therefore believe that it is critical to provide policymakers with our clear views about the role that trade policies play in unleashing a new era of U.S. competitiveness.

NFTC's membership spans the breadth of the national economy. It includes sectors such as energy products, capital goods, transportation, consumer goods, technology, healthcare products, services, e-commerce and retailing. Our companies account for more than \$3 trillion in total sales worldwide, employ over five million Americans and produce a large share of our nation's total exports. NFTC members play an important role in ensuring a healthy national economy and promoting U.S. global leadership.

Thank you for the opportunity to inform your investigation.

Sincerely,

A handwritten signature consisting of two stylized letters, 'Rf' and 'Yt', written in black ink.

Rufus Yerxa
President