



May 1, 2020

Submitted via the Federal eRulemaking Portal: <http://www.regulations.gov>

Office of the United States Trade Representative  
600 17th Street NW  
Washington, DC 20508

**Subject: Docket No. USTR-2020-0014 Concerning Additional Modifications to the 301 Action to Address COVID-19: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation**

Dear Sir or Madam:

The Computing Technology Industry Association (CompTIA),<sup>1</sup> the leading association for the global information technology (IT) industry, respectfully submits these comments to the Office of the United States Trade Representative (USTR) in response to the above-captioned Request for Comment.<sup>2</sup> CompTIA urges USTR to indefinitely suspend all China Section 301 tariffs to support the Administration's efforts in combating COVID-19.

CompTIA and its member companies encompass a wide cross-section of the IT sector, including software, technology services, telecommunications services, and device and infrastructure companies. Our member companies provide the critical technical infrastructure needed to respond to the COVID-19 medical crises through their applications and tooling, hardware components, IoT devices, and telecommunications services. All these services and information and communication technology (ICT) related products play an essential role in working under social distancing measures, as well as, accelerating advances in COVID-19 treatment and response.

The ICT sector is vital in facilitating an extensive medical response to the current pandemic. CompTIA's member companies provide parts and components found in lifesaving healthcare devices and support the communication and cloud infrastructure needed for medical professionals to properly perform their duties. CompTIA appreciates the opportunity to provide input for consideration of alleviating tariffs on ICT products that are necessary for medical professionals.

---

<sup>1</sup> CompTIA supports policies that enable the information technology industry to thrive in the global marketplace. We work on behalf of our 120-plus member companies to promote investment and innovation, market access, robust cybersecurity solutions, commonsense privacy policies, streamlined procurement, and a skilled IT workforce. Visit [www.comptia.org](http://www.comptia.org) to learn more.

<sup>2</sup> [[Fed Register Citation]], <https://www.regulations.gov/docket?D=USTR-2020-0014>



Furthermore, as indicated in the guidance provided by the Department of Homeland Security (DHS) Cybersecurity and Infrastructure Security Agency (CISA), workers in the IT industry are deemed critical during the COVID-19 crises to support healthcare and public health; maintenance of communications and cloud infrastructure; and support remote learning and other critical activities.<sup>3</sup> The information technology equipment used by these workers is also necessary for these efforts. As the Administration considers tariff relief for medical products, we strongly believe that additional tariff relief is absolutely necessary for products supporting essential critical infrastructure workers and that directly strengthen to the overall U.S. economic health.

Lastly, CompTIA calls upon USTR to indefinitely suspend all Section 301 tariffs during this devastating health crisis. The ICT industry plays a fundamental role in supporting the U.S. healthcare system and all essential workers during a pandemic. The technologies used by healthcare providers and essential critical infrastructure workers, such as computers, data centers, cloud services, mobile devices, and printers aid in streamlining and connecting the communication between workers, government officials, and the American public on urgent health and safety updates on COVID-19.

### **Hi-Tech Products for Exclusion for Essential Critical Infrastructure Workers**

#### **Personal computers (PC), Monitors, Data Storage Equipment, Workstations, Servers, and other Computing Devices:**

Finished PCs, monitors, data storage equipment, workstations, servers, wifi devices and other computing devices are used by all essential critical infrastructure workers. Doctors and nurses are on the frontline of the pandemic and routinely use PCs, monitors, wifi devices, and other computing devices to record patients' recovery and response to treatment and to log medical data used to track COVID-19 for public safety purposes. PCs, monitors, workstations, wifi devices and computing devices are also an essential tool for medical researchers working around the clock to develop a cure for the novel coronavirus. These devices are needed in both the medical research itself but also sharing crucial medical findings with other researchers in different facilities. Public health and healthcare workers consistently rely on these tools in their effort to combat COVID-19.

Furthermore, other essential critical infrastructure workers use PCs, monitors, data storage equipment, workstations, servers, wifi devices, and other computing devices that are outside the health-care field. Law enforcement, first responders, and public safety officers, for example, depend on their computing devices when keeping the public safe. They make telework

---

<sup>3</sup> Department of Homeland Security, CISA, (March 28, 2020): Guidance on the Essential Critical Infrastructure Workforce. <https://www.cisa.gov/publication/guidancpe-essential-critical-infrastructure-workforce#download>

and remote learning possible while social distancing policies are in effect. Computing devices and workstations are used to manage health and safety enforcement measures through tracking the problem areas and projecting new cases. Additionally, communications and information technology (IT) workers use PCs, monitors, data storage equipment, workstations, servers, wifi devices and computing devices daily and these devices are responsible for the restoration and construction of networks. Without the use of these computing devices, these essential critical infrastructure workers would not be able to ensure that other essential workers have access to the tools they need, namely the internet, so they can transmit crucial data needed help patients.

## **Printers, Ink, and Toner:**

Finished goods and parts, including printer ink and toner, for printers are vital products needed by essential critical infrastructure workers' efforts against the coronavirus pandemic. Printers are used in medical offices, hospitals, for biofluidics testing and dispensing, as well as the printing of information and signage for COVID-19 public awareness. Ink and toner, for example, are used by grocery stores in printing their receipts. Grocery stores and food businesses are deemed essential businesses and are one of the only places American citizens can venture. Grocery stores rely not only on printing ink and toner for their receipt machines, but also printers themselves to label and track new food inventory. Printers, printing components, ink, and toner are also used by transportation and logistics personnel and in distance learning. These devices and products are needed to track shipments of goods for example, printed labels for shipments and barcodes for tracking. Without these products, transport of medicine and medical supplies would not be able to move between locations – a critical necessity during a pandemic.

## **3D Printers, Components and Material Supplies:**

3D printers, components and associated supplies directly enable crucial responses to the COVID-19 pandemic. Examples include 3D printing of personal protective equipment, such as FFP3 masks and face shields, which directly contribute to the U.S. economic and public health response to the current crisis. These products, components and supplies are classified within HTSUS 8477.80.00.00, 8477.90.85.95, which are on China 301, List 1. However, the impacted items are not produced in China and therefore, Section 301 tariffs are not applied. Nevertheless, they are subject to a 3.1% MFN rate. CompTIA calls on USTR to suspend this tariff by creating Chapter 98 codes covering the impacted products.

## **Semiconductors:**

Semiconductors (e.g. electronic integrated circuits in the form of microprocessors, microcontrollers, application specific integrated circuits, programmable arrays, and memory) are an integral part of the U.S. economy and a driving force of economic competitiveness and innovation in the 21st century. Semiconductors are responsible for countless technology



innovations such as powering electronics, computing, and “smart” products found in a large share of American households, offices, and communities. Most importantly, semiconductors are widely used by essential critical infrastructure workers as these circuits provides critical logic, power, and electrical connections for a computer motherboard or other essential ICT products such as cell phones, tablets, and other mobile computing devices. Semiconductors are essential components of the technologies that control and enable essential infrastructure and life-critical equipment such as health care and medical devices, water systems and the energy grid, transportation and communication networks, and the financial system. Semiconductors also underpin the IT systems that enable remote or online work, education, and shopping for essential supplies, as well as access to services across every domain, including medicine, finance, education, government, food distribution, and more. Without semiconductors, computing devices would be rendered inept at helping essential critical infrastructure workers perform their fundamental duties.

### **Networking Equipment:**

CompTIA urges USTR to exempt all networking equipment, particularly radios, routers, and switches from China Section 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. Hospitals and healthcare providers heavily rely on networking equipment through their use of telehealth and virtual care to treat patients remotely. Social distancing, the easiest way to stem the spread of COVID-19, is crucial in flattening the curve. Networking equipment helps doctors’ practice social distancing with their patients, keeping everyone safe. Additionally, drive-thru testing sites heavily rely on networking equipment to incorporate patients’ data into the hospital network systems. Furthermore, networking equipment is used by healthcare professionals to provide vitally important data to relevant government agencies during this crisis.

Networking equipment also remains integral to the communications and IT sectors, as well as the advanced manufacturing sector. Jobs within these categories were deemed essential by CISA as they provide critical infrastructure to the Section 301 tariffs on networking equipment is counterintuitive of the great efforts put forth by the Administration to combat COVID-19. These critical products, in fact, help prevent the spread of infection support essential critical infrastructure workers by ensuring these products are ubiquitously deployed and used.

### **Connected Devices:**

CompTIA requests the tariff removal from connected devices found in voice activated systems, smart thermostats, and security systems such as cameras. These devices and others enabled by the internet, are crucial tools used by critical infrastructure workers to perform their job duties to combat the virus. For example, now more than ever it is vitally important to keep surfaces clean to help stem the spread of the coronavirus, especially those used by doctors,



nurses, and first responders. Voice activation allows for this to occur, particularly with limited disinfectant supplies available to hospitals. Additionally, smart thermostats are critical for hospitals to keep the temperature in the ICU properly regulated and should not be subject to tariffs.

Another connected device crucial in helping critical infrastructure workers are security systems. Security systems allow for the assurance of secure medical deliveries being dropped off at hospitals. They are also essential for law enforcement personnel and other critical infrastructure workers monitoring businesses and work sites from remote locations to help stem the spread. It is harmful to impose Section 301 tariffs on connected devices in such they are ubiquitously used by all essential critical infrastructure workers.

### **Video Cameras:**

CompTIA urges the removal of video cameras from Section 301 tariffs as they are also critical products in helping combat the coronavirus. High definition cameras used in video conferencing and safety devices are increasingly vital during social distancing. Not only do average Americans who are working from home use video cameras daily for conference calls, but essential critical infrastructure workers do as well. For example, the U.S. government workers rely on these high definition cameras for video conferencing and communicating with the American public on the virus. News personnel and others working to spread data and critical information about COVID-19 use high definition cameras. Section 301 tariffs on video cameras is extremely shortsighted as these products become increasingly more vital during the COVID-19 pandemic.

### **Electronic Testing Tools:**

CompTIA requests the removal of electronic testing tools (e.g. oscilloscopes, multimeters, power supplies, switchers and current sources) in headings 9030.20, 9030.20, 9030.84, 9030.89, and 8537.10. These products should not be subject to Section 301 duties as these instruments are critical for many U.S. industries to design and calibrate medical equipment as well as to keep their operations up and running efficiently and keep workers safe. Oscilloscopes are used to develop and debug the control boards used in medical equipment such as ventilators, ultrasound machines and cat scan equipment. This design phase is particularly important as car manufacturers such as Tesla re-tool to make ventilators. In addition, oscilloscopes, multimeters, programmable DC power supplies, switchers, and precision/low noise current sources are the tools and electrical standards used in test stations for medical equipment calibrations. Without proper calibration medical equipment cannot function.

Other industries that use electronic testing tools, such as oil and gas companies and the U.S. military, are deemed essential during the pandemic. Millions of technicians rely on

oscilloscopes, multimeters and other test and measurement equipment to troubleshoot and repair equipment every day. Due to the tariffs, essential critical infrastructure workers endure increased maintenance costs which could harm the American effort to combat COVID-19.

Furthermore, battery stimulators and power supplies used in test and measurement, should not be subjugated to Section 301 tariffs during the COVID-19 pandemic. These products directly contribute to the American effort to combat COVID-19 by supplying battery life to tablets, cell phones, IoT devices, and medical electronics. During this devastating outbreak, doctors, nurses, law enforcement, and public safety providers require continued battery life to their devices, particularly for those professions in the medical field. Increased development and manufacturing costs will ultimately raise the price of medical devices and other battery powered devices necessary during a pandemic.

### **Washing Machines and Parts:**

Washing machines and its parts in headings 8422.11.0000 and 8450.90.6000 all use high-technology components in the finished devices through the installation of chips and IoT devices. High-tech components are found in the washing machine doors, control panels, and hose parts. Washing machines and its parts are crucial in providing anti-COVID-19 sanitation for health care workers and in American homes. These high-tech components are currently subject to Section 301 tariffs and CompTIA requests a full elimination of tariffs on these products.

### **Vacuums and Hard Floor Cleaners:**

CompTIA urges USTR to remove tariffs from vacuums and hard floor cleaners. According to the Center for Disease Control and Prevention (CDC), it's possible for someone to contract COVID-19 by touching a contaminated surface—like a doorknob, light switch, or stepping into a contaminated floor—and the virus may live on some surfaces for several hours or even days, even shoe soles.<sup>4</sup> That's why it's essential to clean and disinfect frequently touched surfaces and floors often. According to the CDC, samples were taken from various surfaces at Huoshenshan Hospital in Wuhan, China, including the soles of ICU staff members' shoes. Out of those samples taken from shoes, half of them tested positive for the virus, leading researchers to suggest that the soles of shoes might function as carriers of the disease. When it comes to preventing the spread of germs, it helps to understand the difference between cleaning and disinfecting. Cleaning is the act of removing germs, dirt, and impurities (vacuum cleaners serves this purpose). Disinfecting is when you use chemicals to kill germs (like spraying with a bleach solution). By cleaning first, then disinfecting, you can lower the risk of infection. Based on the

---

<sup>4</sup> Center for Disease Control and Prevention. Volume 26, Number 7. July 2020.  
[https://wwwnc.cdc.gov/eid/article/26/7/20-0885\\_article](https://wwwnc.cdc.gov/eid/article/26/7/20-0885_article)





points above, vacuum cleaners and hard floor cleaners should be considered as essential to combat the COVID-19 outbreak.

### **Industrial Sewing Machines:**

Due to the COVID-19 outbreak, there has been a critical nationwide shortage of personal protective equipment (PPE), such as face masks, isolation gowns, caps, booties, etc. which is crucial to both stop the spread of COVID-19 and keep the healthcare professionals on the frontline safe during this pandemic. Industrial sewing machines are used in the production of these types of PPE and are currently in high demand by manufacturers of this equipment as well as apparel companies and others who are scaling up production of this equipment in order to meet the high demand of these products. Industrial sewing machines found under 8452.21.9000 and 8452.29.9000 are currently subject to the China section 301 tariffs and CompTIA requests a full elimination of tariffs on these products.

### **Hi-Tech Products for Exclusion for Non-Essential Critical Infrastructure Workers**

ICT products such as PCs, monitors, printers, data storage equipment, semiconductors, servers, wifi devices, mobile devices, are also widely used by non-essential critical infrastructure workers. Most Americans who are working from home require the use of these products in order to continue their job and sustain the U.S. economy. Without the use of these vital tools, the U.S. economy would sink further into a recession as more and more Americans rely on these products in their daily lives. Additionally, PCs, monitors, printers, semiconductors, and transmission devices are used by educators and students during this pandemic. Many American schools have been closed and will remain closed for the rest of the school year. Instead, teachers have been asked to teach lessons via online platforms where students can then view those lessons at home. Sometimes, teachers could send worksheets in which the student must print them out to complete as homework. These products remain vital to the continuation of education in a time of crises. Without these products, students will fall behind causing a great deal of other societal issues.

Networking equipment such as radios, routers, and switches are also essential for Americans practicing social distancing. American workers and families have been encouraged to work from home and attend online academic classes to flatten the curve and prevent new infections. The U.S.' wired and wireless telecommunications networks are dependent on networking equipment. These products assist millions of Americans working from home by providing videoconferencing, communication management, and online collaboration – all services needed for those working from home. Affordable access to telecommunications networks is particularly pertinent during a crisis and recession. Eliminating tariffs on networking equipment will lessen the cost burden on Americans recently unemployed or with vulnerable jobs.



Likewise, connected devices such as smart speakers, wireless headphones, and voice activated systems have been essential to Americans working from home during social distancing. Speakers and wireless headphones are also essential for school children continuing their education online. CompTIA urges USTR to fully eliminate Section 301 tariffs on all connected devices such as these.

Finally, CompTIA urges USTR to remove Section 301 tariffs on small kitchen appliances as States have required the closing of restaurants due the social distancing mandate. Americans are preparing food at home and require the proper kitchen tools at an affordable rate in order to feed their families. Since many Americans are economically vulnerable due to job loss or uncertainty, it is increasing crucial for them to have easy and affordable access to proper kitchen tools. Tariffs on these products are harmful, particularly when Americans have less disposable income to purchase essential items, such as small kitchen appliances. It is necessary to remove tariffs on these products to ensure American families are able to properly feed their families.

### **Conclusion**

The outbreak of COVID-19 has created an urgent need for reliable tools and supplies needed by health-care professionals, essential critical infrastructure workers, and non-essential working Americans. CompTIA appreciates the opportunity given by USTR to consider tariff removal from products that are needed to respond to the COVID-19 outbreak. CompTIA strongly urges the Administration to fully eliminate all Section 301 tariffs, particularly those pertaining to the IT sector as they remain vital tools for the fight against COVID-19.

Sincerely,

A handwritten signature in black ink that reads "Stefanie Holland".

Stefanie Holland  
Vice President, Federal and Global Policy  
Computing Technology Industry Association (CompTIA)

A handwritten signature in black ink that reads "Maggie Henkin".

Maggie Henkin  
Manager, Global Trade & Market Access  
Computing Technology Industry Association (CompTIA)





## Annex of Products CompTIA Requests for Removal:

The specific tariff codes listed below are currently subject to Section 301 tariffs and are needed to support ongoing the treatment and relief for COVID-19:

US HTS code	Products
3215.11.9060	Ink black
3215.19.9060	Ink other colors
3916.90.3000	Monofilament for 3D Printer
4009.12.0000	Hose Assemblies (for washing machines, connecting tub-to-drain)
4202.00.0000	Cases, Bags for computers
4802.62.6140	Printer Paper
5806.20.0090	Retention Bands
8418.69.0080	Ice Cream maker
8422.11.0000	Dishwasher
8431.20.0000	Drive Unit components and mechanical subassemblies
8441.10.0000	Printers
8443.19.0000	Digital Press
8443.31.0000	MFP
8443.32.1000	3D Printer
8443.32.1010	SFP
8443.32.1020	
8443.32.1040	
8443.32.1050	
8443.31.1060	
8443.31.1070	
8443.31.1080	
8443.31.1090	
8443.32.5000	Printer (single function units other than printer units)
8443.91.3000	Digital Press Parts
8443.99.2010	Supplies / Parts of Printer
8443.99.2050	
8443.99.2510	Ink Cartridges
8443.99.2550	Supplies / Parts of Printer
8443.99.5011	
8443.99.5015	
8443.99.5050	

8450.90.6000	Other Washing Machine Parts: Washing machine door lock switch, Washing machine control window panel, Washing machine clutch assemblies, Washing machine window encoder
8452.21.9000	Sewing machines, automatic, nesoi.
8452.29.9000	Sewing machines, other than automatic, nesoi
8471.41.0150	AiO DT PCs touchscreen
8471.49.0000	DT PC Computer Systems including servers
8471.50.0150	DT PCs standalone (no display) / Workstations / Thin Clients / Servers
8471.50.0150	MLBs
8471.50.0150	Small Form Factor DT, DT PCs standalone (no display) / Workstations / Thin Clients
8471.50.0150	Motherboards / Server and Server Rack Storage
8471.60.8000	Scanners
8471.60.9050	Computer Mouse
8471.70.2000	HDD (Hard Disk Drive)
8471.70.4065	Hard Disk Drives
8471.70.5065	Storage units, thin clients
8471.70.6000	
8471.70.9000	
8471.80.9000	
8471.80.1000	Docking Stations, USB Hubs, Controllers, Adapters / Camera Links
8471.90.0000	Card readers
8473.30.1140	Memory Modules / DRAM (Random Access Memory) / RAM (Random Access Memory)
8473.30.1180	Motherboards / printed circuit boards
8473.30.5100	Other Parts of computer / Heatsink
8479.89.9499	Gate
8479.90.9496	Full gate
8502.13.0040	Generator
8504.23.0041	Transformer
8504.23.0045	
8504.23.0080	
8504.40.6001	PSU (Power Supply Unit)
8504.40.6007	
8504.40.6012	Power supply for automatic data processing machines > 150w but < 500w
8504.40.6018	Power supply for automatic data processing machines > 500w
8504.40.8500	UPS (Uninterruptible Power Supply) / Power supply for telecommunication apparatus

8507.20.8041	Lead acid storage batteries
8507.50.0000	Ni-MH (Nickel-Metal-Hydride) battery packs: used for infusion pumps, military-grade flashlights, and other medical equipment.
8507.60.0020	Lithium ion batteries
8508.11.0000	Robotic vacuums, Hand held vacuums, Canister vacuums, Cordless vacuums, Upright vacuum cleaners, Carpet cleaners, Steam and hard floor cleaners,
8509.40.0015	Blender
8509.40.0025	Stand Mixer & Hand blender
8509.40.0030	Juice Extractor
8516.60.4060	Digital Oven
8516.60.4070	Digital Oven (portable)
8516.60.4074	Digital Oven
8516.60.6000	Electric Grill
8516.71.0020	Coffee & Espresso machine (Automatic drip and pump type)
8516.71.0040	Coffee & Espresso machine (Percolator)
8516.71.0040	Coffee & Espresso machine (Percolator)
8516.71.0060	Coffee & Espresso machine
8516.71.0080	Coffee maker
8516.72.0000	Toaster
8516.79.0000	Waffle maker & waffle maker
8517.61.0000	Base stations
8517.62.0000	Switches
8517.62.0010	Modems, Switching and routing apparatus, Mobile Hotspot devices
8517.62.0020	Switches and routers / Server Rack- Networking
8517.62.0050	Routers for Home Office
8517.62.0090	Machines for the reception, conversion and transmission or regeneration of voice, images or other, data, including switching and routing apparatus, Other
8517.69.0000	Other apparatus for transmission or reception of voice, images or other data, including apparatus for communication in a wired or wireless n
8517.70.0000	Interface cards and chassis / Enclosure
8518.21.0000	Smart speaker
8518.22.0000	Smart speaker
8518.30.1000	Line telephone handset
8518.30.2000	Wired headphones
8518.30.2000	Consumer & professional headphones, Headsets for office & call center with noise cancellation
8521.90.0000	Digital Video Recording

8523.51.0000	Discs, tapes, solid-state non-volatile storage devices, "smart cards" and other media for the recording of sound or of other phenomena, whether or not recorded, including matrices and masters for the production of discs, but excluding products of Chapter 37: Semiconductor media: 8523.51.00 00 Solid-state non-volatile storage devices
8523.52.0010	Smart Cards
8523.52.0090	
8525.80.3010	Cameras for Smart Home
8525.80.3050	Cameras for Smart Home
8525.80.4000	Camera / video doorbell cameras
8525.80.5050	Web Cameras
8525.80.5015	Camcorder
8528.52.0000	Monitors / Computer Display
8528.90.9900	Parts of Computer Monitors
8536.50.7000	ATS (Automatic Transfer Switches)
8536.70.0000	Adaptors- Optical Fibers
8537.10.9100	Other; Switchgear assemblies and switchboards
8537.10.9120	Switchboard / Switchgear
8537.20.0020	
8537.10.9170	Power Distribution Units (PDUs) / rPDU (Rack Power Distribution Unit) / Fuse Terminal Assemblies / Smart Plugs / Power Distribution Units (PDU)
8541.10.0000	Diodes, other than photosensitive or light-emitting diodes
8541.40.6000	Diodes for semiconductor devices, other than light-emitting diodes, nesoi
8542.31.0000	Electronic integrated circuits: processors and controllers
8542.31.0001	CPU (Central Processing Unit)
8542.31.0001	Graphic Processing Unit (GPU)
8542.32.0000	Electronic integrated circuits: memories
8542.33.0000	Electronic integrated circuits: amplifiers
8542.39.0000	Electronic integrated circuits: other
8542.90.0000	Parts of electronic integrated circuits and microassemblies
8543.70.9960	Pedestal
8544.20.0000	Coaxial Cable w/ Connector
8544.42.2000	Cables with Connectors for telecommunications, for a voltage not exceeding 1,000 V / USB Cables
8544.42.9090	Other Cables with Connectors for a voltage not exceeding 1,000 V / non-USB Cables / Adaptors- Fitted with Connectors, not Optical Fibers
8544.42.9090	Cables

8544.49.1000	
8544.49.3040	Copper Cables
8544.49.3080	
9013.80.7000	LCD Display Panels
9025.80.1000	Smart thermostats
9030.20.1000	Oscilloscopes and oscillographs: Other oscilloscopes and oscillographs
9030.32.0000	Multimeters, with a recording device
9030.84.0000	Instruments and apparatus for measuring, checking or detecting electrical quantities or ionizing radiations, nesoi: with a recording device
9030.89.0100	Instruments and apparatus for measuring, checking or detecting electrical quantities or ionizing radiations, nesoi: w/o a recording device
9401.30.8010	Desk Chairs
9401.30.8030	
9403.10.0040	Rack Rails and Hardware
9403.90.6080	Fabric Bin Arrays (FBAs)
9403.90.8041	Cable Management / Add on Hooks
9405.40.6000	Smart lighting
9405.40.8200	Smart lighting (led)
9506.91.0010	Exercise cycle
9506.91.0030	Exercise bike