



April 15, 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-2020-0013 Request for Comments Concerning the Extension of Particular Exclusions Granted Under the June 2019 Product Exclusion Notice From \$34 Billion Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Dear Sir or Madam:

The Computing Technology Industry Association (CompTIA),¹ 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.²

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. CompTIA's member companies provide the critical technical infrastructure needed to power the American economy through their applications and tooling, hardware components, IoT devices, and telecommunications services. All these services and more play an essential role in maintaining U.S. technological and economic global leadership.

The U.S. is currently facing one of its greatest challenges, the COVID-19 pandemic. This devastating pandemic has wreaked havoc on the U.S. economy and American citizens by compromising their livelihoods through the necessary practice of social distancing. Unduly tariffs on \$34 billion worth of goods prevents U.S. companies from having access to the capital they need to continue to employ Americans during the pandemic. Furthermore, U.S. companies relying on the products on List 1 need to retain liquidity in order to stay afloat while being forced to shut down for an unforeseen amount of time during the COVID-19 pandemic. Tariffs on List

¹ 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 to learn more.

² [[Fed Register Citation]], https://ustr.gov/sites/default/files/enforcement/301Investigations/Request_for_Comments_Concerning_the_Extension_of_Particular_Exclusions_March_17.pdf



List 1 products can prevent small and medium size businesses from having enough capital to brave the pandemic. Additionally, many of the products on List 1 are deemed essential to the fight against coronavirus and are needed to sustain the U.S. economy during the COVID-19 pandemic. These products are used by medical professionals and other essential workers in order to successfully perform their duties and keep citizens safe. Since tariffs are effectively a tax on American companies and consumers, extending tariff exclusions would free up businesses and consumers alike to use their money more wisely for necessary purposes aiding them during the pandemic.

CompTIA calls on the Administration to eliminate all tariffs on List 1 as U.S. companies and American citizens require the extra capital during the COVID-19 pandemic. At the very least, the Administration should extend tariff exclusions for all products that have been granted exclusions, including the fifth set of exclusions which were granted in June 2019 and are scheduled to expire on June 4, 2020.

Sincerely,

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

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

IT Products for Extension

Annex of Products CompTIA Requests for Removal

The specific tariff codes listed below are currently subject to Section 301 tariffs and their exclusions are set to expire in June 2020:

HTS subheading	Product Description
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 4 cm to 6 cm in width and 10 cm to 12 cm in length, that converts 36 V DC to 90 V AC (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 7 cm to 9 cm in width and 18 cm to 20 cm in length, having 2 switches, for power protection to prevent electrical back feeding (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, the foregoing serving as controllers for power supplies, each measuring 5 cm to 7 cm in width and 11 cm to 14 cm in length, having 50 pin on side header (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, the foregoing serving as noise filters, each measuring 18 cm to 20 cm in width and 25 cm to 27 cm in length, populated with semiconductor devices and 4 heat sinks (described in statistical reporting number 8504.90.6500)
8529.90.9900	Projector parts (described in statistical reporting number 8529.90.9900)
8536.41.0050	Electromechanical relays, for a voltage not exceeding 24 V, other than automotive flashers, with contacts rated at 10 A or more, measuring not over 80 mm in any dimension (described in statistical reporting number 8536.41.0050)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 14.4 cm by 11.6 cm by 6.4 cm (described in statistical reporting number 8536.50.9035)

8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 14.6 cm by 8 cm by 14.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 19.1 cm by 8.3 cm by 14.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 19.7 cm by 11.8 cm by 8.3 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 19.7 cm by 9.8 cm by 16.5 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 21 cm by 13.3 cm by 9 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 23.5 cm by 8 cm by 13.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 6 cm by 14.1 cm by 11 cm (described in statistical reporting number 8536.50.9035)
8536.50.9065	Push-pull switches, for a voltage not exceeding 1,000 V, designed for use in motor vehicles (described in statistical reporting number 8536.50.9065)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 4 cm to 6 cm in width and 10 cm to 12 cm in length, that converts 36 V DC to 90 V AC (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 7 cm to 9 cm in width and 18 cm to 20 cm in length, having 2 switches, for power protection to prevent electrical back feeding (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, the foregoing serving as controllers for power supplies, each measuring 5 cm to 7 cm in width and 11 cm to 14 cm in length, having

	50 pin on side header (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, the foregoing serving as noise filters, each measuring 18 cm to 20 cm in width and 25 cm to 27 cm in length, populated with semiconductor devices and 4 heat sinks (described in statistical reporting number 8504.90.6500)
8529.90.9900	Projector parts (described in statistical reporting number 8529.90.9900)
8536.41.0050	Electromechanical relays, for a voltage not exceeding 24 V, other than automotive flashers, with contacts rated at 10 A or more, measuring not over 80 mm in any dimension (described in statistical reporting number 8536.41.0050)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 14.4 cm by 11.6 cm by 6.4 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 14.6 cm by 8 cm by 14.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 19.1 cm by 8.3 cm by 14.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 19.7 cm by 11.8 cm by 8.3 cm (described in statistical reporting number 8536.50.9035)
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8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 21 cm by 13.3 cm by 9 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 23.5 cm by 8 cm by 13.1 cm (described in statistical reporting number 8536.50.9035)
8536.50.9035	Push-button switches, rated at over 5 A, measuring no more than 6 cm by 14.1 cm by 11 cm (described in statistical reporting number 8536.50.9035)

8536.50.9065	Push-pull switches, for a voltage not exceeding 1,000 V, designed for use in motor vehicles (described in statistical reporting number 8536.50.9065)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 4 cm to 6 cm in width and 10 cm to 12 cm in length, that converts 36 V DC to 90 V AC (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, each measuring 7 cm to 9 cm in width and 18 cm to 20 cm in length, having 2 switches, for power protection to prevent electrical back feeding (described in statistical reporting number 8504.90.6500)
8504.90.6500	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus, the foregoing serving as controllers for power supplies, each measuring 5 cm to 7 cm in width and 11 cm to 14 cm in length, having 50 pin on side header (described in statistical reporting number 8504.90.6500)

The specific tariff codes listed below is the comprehensive List 1 of products currently subject to Section 301 tariffs that affect CompTIA members:

HTS subheading	Product Description
8421.21.00	Machinery and apparatus for filtering or purifying water
8421.39.80	Filtering or purifying machinery and apparatus for gases, other than intake air filters for internal combustion engines or catalytic conv.
8443.99.20	Parts of printer units of subheading 8443.32.10 specified in additional U.S. note 2 to this chapter
8443.99.25	Parts and accessories of printers, nesoi
8443.99.50	Parts and accessories of other printing, copying or facsimile machines; nesoi
8471.60.80	Optical scanners and magnetic ink recognition devices not entered with the rest of a ADP system
8471.70.40	ADP magnetic disk drive storage units, disk dia. n/ov 21 cm, not in cabinet, w/o attached external power supply, n/entered w/rest of a system

8471.70.60	ADP storage units other than magnetic disk, not in cabinets for placing on a table, etc., not entered with the rest of a system
8471.70.90	ADP storage units other than magnetic disk drive units, nesoi, not entered with the rest of a system
8473.30.20	Parts and accessories of the ADP machines of heading 8471, not incorporating a CRT, parts and accessories of printed circuit assemblies
8501.31.20	DC motors nesi, of an output exceeding 37.5 W but not exceeding 74.6 W
8501.51.40	AC motors, nesi, multi-phase, of an output exceeding 74.6 W but not exceeding 735 W
8504.90.41	Parts of power supplies (other than printed circuit assemblies) for automatic data processing machines or units thereof of heading 8471
8504.90.65	Printed circuit assemblies of the goods of subheading 8504.40 or 8504.50 for telecommunication apparatus
8504.90.75	Printed circuit assemblies of electrical transformers, static converters and inductors, nesoi
8504.90.96	Parts (other than printed circuit assemblies) of electrical transformers, static converters and inductors
8505.90.70	Electromagnets used for MRI
8506.50.00	Lithium primary cells and primary batteries
8507.30.80	Nickel-cadmium storage batteries, other than of a kind used as the primary source of power for electric vehicles
8523.29.10	Unrecorded magnetic media
8523.49.50	Recorded optical media, nesoi
8528.59.33	Color video monitors w/flat panel screen, video display diagonal > 34.29 cm, not with VCR/player, not subj US note 13
8529.90.16	Printed circuit assemblies which are subassemblies of radar, radio nav. aid or remote control apparatus, of 2 or more parts joined together
8529.90.99	Parts suitable for use solely or principally with the apparatus of headings 8525 to 8528, nesi
8532.22.00	Aluminum electrolytic fixed capacitors
8532.24.00	Ceramic dielectric fixed capacitors, multilayer
8532.25.00	Dielectric fixed capacitors of paper or plastics
8532.29.00	Fixed electrical capacitors, nesi

8533.21.00	Electrical fixed resistors, other than composition or film type carbon resistors, for a power handling capacity not exceeding 20 W
8535.10.00	Fuses, for a voltage exceeding 1,000 V
8535.90.80	Electrical apparatus nesi for switching, protecting, or making connections for electrical circuits, for a voltage exceeding 1,000 V, nesi
8536.41.00	Relays for switching, protecting or making connections to or in electrical circuits, for a voltage not exceeding 60 V
8536.50.90	Switches nesoi, for switching or making connections to or in electrical circuits, for a voltage not exceeding 1,000 V
8536.69.40	Connectors: coaxial, cylindrical multicontact, rack and panel, printed circuit, ribbon or flat cable, for a voltage not exceeding 1,000 V
8536.90.40	Electrical terminals, electrical splicers and electrical couplings, wafer probers, for a voltage not exceeding 1,000 V
8536.90.85	Other electrical apparatus nesi, for switching or making connections to or in electrical circuits, for a voltage not exceeding 1,000 V, nesoi
8538.10.00	Parts of boards, panels, consoles, desks, cabinets and other bases for the goods of heading 8537, not equipped with their apparatus
8541.21.00	Transistors, other than photosensitive transistors, with a dissipation rating of less than 1 W
8541.29.00	Transistors, other than photosensitive transistors, with a dissipation rating of 1 W or more
8541.30.00	Thyristors, diacs and triacs, other than photosensitive devices
8541.40.20	Light-emitting diodes (LED's)
8541.40.95	Photosensitive semiconductor devices nesi, other
8541.60.00	Mounted piezoelectric crystals
8541.90.00	Parts of diodes, transistors, similar semiconductor devices, photosensitive semiconductor devices, LED's and mounted piezoelectric crystals
8544.11.00	Insulated (including enameled or anodized) winding wire, of copper
8544.19.00	Insulated (including enameled or anodized) winding wire, other than of copper

8544.30.00	Insulated ignition wiring sets and other wiring sets of a kind used in vehicles, aircraft or ships
8544.49.30	Insulated electric conductors nesi, of copper, for a voltage not exceeding 1,000 V, not fitted with connectors
8544.49.90	Insulated electric conductors nesi, not of copper, for a voltage not exceeding 1,000 V, connectors not fitted with connectors
8544.60.20	Insulated electric conductors nesi, for a voltage exceeding 1,000 V, fitted with
8544.60.40	Insulated electric conductors nesi, of copper, for a voltage exceeding 1,000 V, not fitted with connectors
8544.70.00	Optical fiber cables made up of individually sheathed fibers
9013.80.70	Liquid crystal and other optical flat panel displays other than for articles of heading 8528, nesoi
9026.20.40	Electrical instruments and apparatus for measuring or checking the pressure of liquids or gases
9030.10.00	Instruments and apparatus for measuring or detecting ionizing radiations
9030.20.05	Oscilloscopes and oscillographs, specially designed for telecommunications
9030.33.34	Resistance measuring instruments
9030.33.38	Other instruments and apparatus, nesi, for measuring or checking electrical voltage, current, resistance or power, without a recording device
9030.39.01	Instruments and apparatus, nesi, for measuring or checking electrical voltage, current, resistance or power, with a recording device
9030.40.00	Instruments and apparatus specially designed for telecommunications
9030.82.00	Instruments and apparatus for measuring or checking electrical quantities, nesoi: for measuring or checking semiconductor wafers or devices
9030.90.25	Printed circuit assemblies for instruments and apparatus for measuring or detecting ionizing radiation
9030.90.46	Parts and accessories for instruments and apparatus for measuring or detecting ionizing radiation, nesi
9030.90.66	Printed circuit assemblies for subheadings and apparatus of 9030.40 & 9030.82
9030.90.68	Printed circuit assemblies, NESOI

9030.90.84	Parts and accessories for instruments and apparatus for measuring or checking semiconductor wafers or devices, nesoi
9030.90.89	Parts and accessories for articles of subheadings 9030.20 to 9030.40, 9030.83 and 9030.89, nesoi
9031.10.00	Machines for balancing mechanical parts
9031.49.10	Profile projectors
9031.49.40	Optical coordinate-measuring machines, nesoi
9031.49.70	Optical instrument & appliance: to inspect masks (not photomask) used to mfg semiconductor devices; to measure contamination on such devices
9031.49.90	Other optical measuring or checking instruments, appliances and machines, nesoi
9031.80.40	Electron beam microscopes fitted with equipment specifically designed for the handling and transport of semiconductor devices or reticles
9031.80.80	Measuring and checking instruments, appliances and machines, nesoi
9031.90.21	Parts and accessories of profile projectors
9031.90.54	Parts & accessories of measuring & checking optical instruments & appliances of subheading 9031.41 or 9031.49.70
9031.90.59	Parts & accessories of measuring & checking optical instruments & appliances, other than test benches or profile projectors, nesoi
9031.90.70	Parts and accessories of articles of subheading 9031.80.40
9031.90.91	Parts and accessories of measuring or checking instruments, appliances and machines, nesoi
9032.10.00	Automatic thermostats
9032.89.40	Automatic voltage and voltage-current regulators, not designed for use in a 6, 12, or 24 V system
9032.90.61	Parts and accessories for automatic regulating or controlling instruments and apparatus, nesi