**Template: Written Submission**

* Submission should appear on company letterhead
* File name should include your company name; we suggest the following format: Company – Written Comment (USTR-2019-0003)
* File should be submitted as a PDF
* See instructions e-mail for additional instructions (including for submitting business confidential information)

**\*\*\***

Date

**Via Regulations.gov**

Ambassador Robert E. Lighthizer

United States Trade Representative

600 17th Street, NW

Washington, DC 20508

**Re: Request for Public Comments Regarding Enforcement of U.S. WTO Rights in Large Civil Aircraft Dispute (Docket No. USTR-2019-0003)**

Dear Ambassador Lighthizer:

On behalf of Company, headquartered in City, State, I respectfully submit these comments in the above captioned matter, and pursuant to the United States Trade Representative’s (“USTR’s”) Federal Register notice dated July 5, 2019.[[1]](#footnote-1) Specifically, Company opposes the proposed retaliatory duties on copper and brass products imported from the European Union under the following tariff headings:7407.10.50, 7409.11.50, 7409.21.00, 7409.29.00, 7409.31.50, 7409.31.90, 7409.40.00, 7409.90.90, and 7410.11.00.

*Describe your company in a short paragraph, including manufacturing location(s), number of employees, and markets / product lines. Feel free to discuss generally any contributions to the local / national economy.*

**Request for Product Removal**

Company opposes the application of additional duties on imports of certain copper and brass products from the EU as proposed in the July 5, 2019 Federal Register notice and as part of the Administration’s enforcement of U.S. WTO rights in the ongoing civil aircraft dispute. Specifically, we urge the removal of the following tariff headings in USTR’s final product list:

|  |  |
| --- | --- |
| 7407.10.50 | Refined copper, bars and rods. |
| 7409.11.50 | Refined copper, plates, sheets and strip, in coils, with a thickness over 0.15mm but less than 5 mm. |
| 7409.21.00 | Copper-zinc base alloys (brass), plates, sheets and strip, in coils. |
| 7409.29.00 | Copper-zinc base alloys (brass), plates, sheets and strip, not in coils. |
| 7409.31.50 | Copper-tin base alloys (bronze), plates, sheets and strip, in coils, with a thickness o/0.15mm but less than 5mm & a width of 500mm or more. |
| 7409.31.90 | Copper-tin base alloys (bronze), plates, sheets and strip, in coils, w/thickness o/0.15mm but less than 5mm & a width of less than 500mm. |
| 7409.40.00 | Copper-nickel base alloys (cupro-nickel) or copper-nickel-zinc base alloys (nickel silver), plates, sheets and strip, w/thickness o/0.15mm. |
| 7409.90.90 | Copper alloys (o/than brass/bronze/cupro-nickel/nickel silver), plates, sheets & strip, w/thick. o/0.15mm but less th/5mm & width less 500mm. |
| 7410.11.00 | Refined copper, foil, w/thickness of 0.15 mm or less, not backed. |

**Rationale for Request**

*Describe in detail (as many paragraphs as you need) how increased duties on these particular products would negatively impact your company, customers, and / or other stakeholders.*

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For the reasons described herein, Company strongly urges the removal of products covered by HTS subheadings 7407.10.50, 7409.11.50, 7409.21.00, 7409.29.00, 7409.31.50, 7409.31.90, 7409.40.00, 7409.90.90, and 7410.11.00. in USTR’s final list of tariff subheadings for retaliatory tariffs in connection with the enforcement of U.S. rights in this WTO dispute. We appreciate your consideration of this request. If you have any questions, please feel free to contact me.

Sincerely,

Name, Title

Company

Physical address

Email address

Telephone number

1. Notice of Hearing and Request for Public Comments: Enforcement of U.S. WTO Rights in Large Civil Aircraft Dispute, 84 Fed. Reg. 32,248 (July 5, 2019). [↑](#footnote-ref-1)