



June 8, 2020

Acting Director Russell Vought
The Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Opposition to ICR Entitled “Large Civil Aircraft Dispute Portal”

Dear Acting Director Vought,

On 27 May 2020, the Office of the U.S. Trade Representative put in an emergency request to the Office of Management and Budget for a new ICR affecting the Large Civil Aircraft dispute. The proposed changes risk causing public harm by making it more complicated for U.S. businesses and citizens to submit their comments on this important matter, thus I ask you to deny this request. Further, I point out that the instructions to comment on this proposal within the Federal Registry Notice were erroneous, and therefore did not adequately allow the public to comment on these requested changes.

Beginning on October 18, 2019, the U.S. Government imposed a 25-percent tariff on wine imported from the EU as retaliation for illegal subsidies to Airbus. Since that time, the tariffs U.S. importers are forced to pay have devastated the U.S. restaurant, wine retail and distribution industries. The COVID-19 pandemic has made an already grave situation much worse. Our businesses supply wine to restaurants and hotels, and thus huge numbers of our members have seen their sales cut by 50-70% due to mandatory closures of these and other businesses. Alliance members are seeing their sales completely collapse at a time when tariffs have already left them in a weakened state.

As the next carousel date for these tariffs approaches, it is critical that the U.S. Government ensures that the public can comment on these critical matters in the least burdensome way possible. Mechanisms that could discourage public comment by making the process seem overly time consuming, when these businesses are already struggling, should be avoided. Given these facts and others, we ask that you deny this proposal.

Regards,

Benjamin Aneff
President, U.S. Wine Trade Alliance