



The Honorable Robert LIGHTHIZER
United States Trade Representative
600 17th Street NW
Washington DC 20508

June 12, 2020

RE : LARGE CIVIL AIRCRAFT DISPUTE PORTAL
ICR REQUEST REFERENCE No: 202005-0350-01

Dear Ambassador LIGHTHIZER:

EUROCONSULTANTS Inc. is a US based consulting firm, advising food and wine businesses from France on regulatory and trade issues impacting their export business to the US. EUROCONSULTANTS Inc. also advises several wine and cheese trade associations from France on these issues, as well as helping them to conceive and implement promotion and marketing strategies. EUROCONSULTANTS has a business relationship with over 800 food and wine companies, mostly small businesses.

EUROCONSULTANTS appreciates the opportunity to write on behalf of food and wine partners and convey our concerns about the impact of the proposed collection of submission through a formatted portal, on the ability and the willingness of some stakeholders, especially non US third parties, to submit comments.

French and European businesses who export wines and cheeses to the United States are key business partners with US importers and distributors and contribute to their financial livelihood. Imposing a 25 pct additional duty on certain wines from France is hurting not only French businesses, but the combination of the COVID pandemic and the additional tariff has devastated small US import businesses as well as restaurants.

As USTR noted, there is broad public interest in this issue. Close to 26 000 comments were filed in response to the December 2019 request for comments, mostly in opposition of the wine tariffs. The vast majority of the comments were filed by individuals or small business owners, employees or consumers with little to no familiarity with the intricacies of the trade lexicon and for that matter, with the specific HTSUS number for a given product.

We are very much concerned that the proposed changes will discourage public participation, because of the increased burden and complexity the ICR brings to the public comment process.

Is the average consumer or even the wine retailer who buys from a wholesaler/distributor, or the restaurant owner, supposed to know or make the effort to research the specific HTSUS number for each wine category?



Does the average consumer or small business owner need to consult with a trade lawyer or trade consultant to make sure he can get the right TSUS number to complete the form?

Restricting comments through a formatted portal would clearly have the unintended consequence of drastically limiting public participation in the comments process. Big corporations, trade associations, lawyers representing large businesses will still be able to comment.

The formatted portal will disproportionately impact the individual consumer or the small business owner, by erecting new barriers to their ability to make their opinion count. It defeats the purpose of the public comment process.

In conclusion, EUROCONSULTANTS respectfully requests on behalf of its 800 food and wine exporting client companies, that the integrity of the existing process be safeguarded and maintained as is. 26 000 comments are the testimony of a vibrant interest of the general public in USTR's actions that negatively impact their access to wines and spirits by raising the prices through import tariffs.



Ralph Richter
President EUROCONSULTANTS Inc.