AMERICAN ITALIAN
FOOD COALITION

June 5, 2020

The Honorable Robert E. Lighthizer
United States Trade Representative
Office of the U.S. Trade Representative
600 17th Street, NW
Washington, DC 20508

Re: Request for the Office of Management and Budget to Provide Emergency Clearance of a New Collection of Information Titled 'Large Civil Aircraft Dispute Portal'

Dear Ambassador Lighthizer:

The American Italian Food Coalition (AIFC) appreciates this opportunity to respond to the Office of the United States Trade Representative's (USTR) request for comments to the Federal Register notice issued May 27, 2020 *(85 FR 31845)* [Docket No. USTR—2020—11430].

The AIFC is an alliance of more than 450 Italian companies, manufacturers, and trade associations dedicated to ensuring American consumers continue to have access to high-quality, affordable, imported Italian products including pasta, coffee, biscuits, and wafers. AIFC's members represent a broad range of Italian food and beverage manufacturers and actively promote the value and products our companies bring to U.S. consumers and the economy.

The AIFC's members and the products we make contribute to the strong cultural identity of many of America's great cities, and our products support thousands of jobs throughout the supply chain – from service workers and grocery clerks to shippers and truckers who move our products from port to aisle.

The AIFC was pleased to see USTR's Federal Register notices dated October 18, 2019 and February 21, 2020 excluded sweet biscuits (1905.3100), waffles and wafers (1905.3200), coffee (0901.2100-0901.2200), and pasta (1902.1120-1902.3000) imported from most European countries. These products are uniquely Italian in nature and are not in any way related to the ongoing subsidy dispute regarding the Airbus consortium countries, to which Italy is not a party.

The AIFC looks forward to submitting comments in that regard during the next review period, estimated to begin on June 23, 2020. While the AIFC believes USTR's review process to date has been fair and fact-based, the Coalition experienced a nearly two-week delay and some difficulty in the publication of its comments during the last comment period, which closed on January 13, 2020. The AIFC recognizes the significant burden USTR faces in processing nearly 25,000 comments in response to each revision notice and is grateful for the agency's thoughtful and deliberate approach.

As such, the AIFC writes in support of the agency's request for emergency review and clearance of a new information collection request (ICR) titled *Large Civil Aircraft Dispute Portal.* The AIFC believes such a portal will help USTR more efficiently evaluate respondent information by streamlining the public comment process.

The AIFC looks forward to utilizing the proposed portal to request the continued exclusion of Italian sweet biscuits, waffles and wafers, coffee, and pasta during the next review period.

Respectfully,

The American Italian Food Coalition