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Comment from Edward Proctor,

The is a Comment on the Office of United States Trade Representative (USTR) Notice: Agency Information Collection Activities; Proposals, Submissions, and Approvals: Large Civil Aircraft Dispute Portal

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Comment

I own a small wine importing business that was much larger 3 years ago, when I decided to join forces with a bigger distributor in order to expand our ability to deliver around the state of Texas. That proved to be a disaster; the bigger business proved to be unscrupulous and incompetent, and I lost almost all of what I had built up over the previous 10 years before I was able to break free from the agreement on September 1, 2019. This put me in the position of starting over with a skeleton staff and reduced inventory. I made a quick 2-day tour of South Texas with a French winemaker during which we sold some 281 bottles of wine for \$33,780.00; our landed cost on those wines was due to create a fair 27.8% GPM. When the producer (a very small estate) had problems preparing the shipment, it arrived in the US after the strike date for the 25% tariff. Before expense for samples and travel were removed, that reduced the Gross Profit Margin to 10%, at a time when I was desperate to keep our business afloat.

That problem has persisted; even when I know in advance that the tariff will be applied, that changes the price by enough to skew the market horribly. Sales on gentle, lower alcohol wines from France and Spain are cannibalized by enormous, high-alcohol replacements from France, Spain, and the US.

I fully understand the issue here; the subsidies to Airbus create an unfair advantage; if it is believed that we can strike at the offending countries best in other industries than aircraft, can we at the very least rotate which industries we affect? We feel more than a little put upon that our small business, already in recovery mode and clawing our way back to solvency, should have to shoulder the burden for an enormous multi-billion dollar enterprise like Boeing,

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regardless how unfair the European trade practices. Isn't it time for someone else to pull the oars for awhile?