



June 09, 2020

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

Submitted Electronically

Re: Large Civil Aircraft Dispute Portal Information Collection Request (ICR) (ICR Reference No: 202005-0350-001).

Dear Ambassador Lighthizer:

The Global Business Alliance (“**GBA**”), formerly the Organization for International Investment, appreciates the opportunity to provide the following comments regarding the USTR’s proposed Large Civil Aircraft Dispute Portal (the “**Portal**”).

GBA exclusively represents the U.S. subsidiaries of many of the world’s leading international companies. International companies are invested in just about every industry and in every state across the United States, but they are especially concentrated in the manufacturing sector – responsible for employing 20 percent of America’s manufacturing workforce. Moreover, international companies reinvest \$100 billion annually back into their U.S. operations which adds to their ongoing presence and commitment to our economy.

Along with creating millions of high-paying U.S. jobs, these international companies operating in the United States produce over a quarter of U.S. goods exports, sending American-made goods to customers around the world. In short, international companies help broaden America’s economy and open new markets.

GBA’s mission is to ensure that policymakers at the federal, state and local level understand the critical role that foreign direct investment plays in America’s economy. GBA advocates for fair, non-discriminatory treatment of foreign-based companies and promotes policies that will encourage them to establish U.S. operations, which in turn increases American employment and U.S. economic growth.

GBA would like to take this opportunity to thank USTR for your continued efforts to promote international trade, resolve disputes and further enhance the trade policy of the United States. We also recognize that during the last comment and review period regarding tariffs associated with the large civil aircraft dispute USTR received nearly 26,000 comments from stakeholders, that the agency expects nearly the same amount of comments during the next round, and that this volume represents a heavy processing burden on the agency. We recognize that the intention of the proposed Portal is to achieve greater efficiencies in the review process.

However, the expected volume of comments is indicative of the high level of interest in these tariffs. GBA is likewise concerned about the overall impact of retaliatory tariffs and supports fully maintaining the ability for stakeholders to provide sufficient information relative to impacts to their businesses. The new structure may make it more difficult for affected parties to properly communicate the impacts to their businesses and offer supporting documentation.

For instance, the Portal's proposed format significantly limits stakeholders' ability to provide meaningful and substantive feedback to USTR. The information that could be shared with USTR using this Portal could only be very basic and generalized in nature. GBA is concerned that by narrowing the questions within the Portal, affected parties will not have the opportunity to sufficiently make their case in requesting that a particular product should be rotated off the current tariff list.

We also note that question number eight in the Portal allows for stakeholders to provide an additional attachment. We sincerely appreciate that this technical capability has been included in the Portal. However, we would request further guidance as to what specific information and supporting details would be useful for USTR staff as they assess the merit of each comment during the next round to ensure that stakeholder insights are as helpful as possible. We therefore urge USTR staff to offer additional details concerning how the review process will be conducted, what specific criteria USTR will use during their assessment, and what kind of business impact data and supporting information would be helpful for stakeholders to provide in their formal responses to USTR regarding question eight.

Thank you again for your work in promoting free trade and ensuring the United States remains the world's top destination for foreign direct investment. GBA acknowledges the complexities of this matter and the significant resources that are required for USTR to conduct the associated tariff review. It is our hope that these and other comments will help USTR to create a process that does not have a chilling effect on public comments for this important matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Nancy McLernon', with a stylized, flowing script.

Nancy McLernon
President and CEO
Global Business Alliance