

June 9, 2020

Ms. Janice Kaye  
Chief Counsel for Administrative Law  
Office of the U.S. Trade Representative  
600 17th Street, NW  
Washington, D.C. 20508

*Submitted Electronically via [www.regulations.gov](http://www.regulations.gov)*

**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’ [FR Doc. 2020–11430]**

Dear Ms. Kaye:

Thank you for the opportunity to submit these comments on behalf of the National Tooling and Machining Association and Precision Metalforming Association (“One Voice” or “associations”) concerning the review and clearance of a new information collection request (ICR) in the Large Civil Aircraft Dispute. Please see comments filed under Comment ID USTR-2019-0003-26702 for more information on specific HTS codes identified as critical inputs by U.S. manufacturers.

Our members are small and medium-sized manufacturers averaging roughly 50-75 employees and are typically classified under the North American Industrial Classification System (NAICS) as 332 (Fabricated Metal Product Manufacturing) and 333 (Machinery Manufacturing). These classifications combined include 80,000 manufacturing establishments with 2.6 million employees.

The National Tooling and Machining Association’s 1,400 member companies design and manufacture special tools, dies, jigs, fixtures, gages, special machines, and precision-machined parts. Some firms specialize in experimental research and development work as well as rapid prototyping. Many NTMA members are privately owned small businesses, yet the industry sales exceed \$40 billion a year.

The Precision Metalforming Association is the full-service trade association representing the \$137-billion metalforming industry of North America—the industry that creates precision metal products using stamping, fabricating, spinning, slide forming and roll forming technologies, and other value-added processes. Its nearly 800 member companies also include suppliers of equipment, materials, and services to the industry.

The associations believe that it is necessary and proper for the USTR to issue the ICR as a more orderly process to collect and review the information submitted by the public. Please accept the below comment on the ICR suggesting additional questions consistent with previous USTR questionnaires.

Add to Question 3:

c) If a duty rate is currently imposed on the product(s) identified, please indicate whether you would file an exclusion request from the duty should a process become available [Submitter may select the applicable response \*dropdown – Yes, No, Unsure]

Add to Question 4:

c) If a duty rate is not currently in place but is imposed in the future on the product(s) identified, please indicate whether you would file an exclusion request from the duty should a process become available [Submitter may select the applicable response \*dropdown – Yes, No, Unsure]

After Question 6, insert the following:

Question: Does your business meet the size standards for a small business as established by the Small Business Administration? YES/NO

Question: Is this product, or a comparable product, available from sources in the United States? (If you indicate "NO" or "NOT SURE," in the box below, you must explain why the product is unavailable or why you are unsure of the product's availability.) YES, NO, NOT SURE

Question: Is this product, or a comparable product, available from sources outside the EU and China? (If you indicate "NO" or "NOT SURE," in the box below, you must explain why the product is unavailable or why you are unsure of the product's availability.) YES, NO, NOT SURE

Question: Is the EU-origin product of concern sold as a final product or as an input used in the production of a final product or products? FINAL PRODUCT, INPUT, NOT SURE

Question: Is the country of origin of the EU product(s) of concern imported under DFAR from a DFAR Qualifying Country as defined by the Office of the Under Secretary of Defense for Acquisition and Sustainment? YES, NO

Question: Please comment on whether imposing or maintaining duties on this specific product(s) will cause disruptions to the supply of medical-care products used in COVID-19 response efforts or indicate N/A. [public]

Question: Please comment on whether imposing or maintaining duties on this specific product(s) will cause disruptions to Essential Businesses meeting the description of a Critical Manufacturer as defined by the Department of Homeland Security Cybersecurity and Infrastructure Security Agency or indicate N/A. [public]

Thank you for your consideration of these comments.

Sincerely,



David Klotz  
PMA President



Roger Atkins  
NTMA President