



TECHNET
THE VOICE OF THE
INNOVATION ECONOMY

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February 21, 2024

The Honorable Katherine Tai
United States Trade Representative
Office of the United States Trade Representative
600 17th Street, NW
Washington, D.C. 20006

Via electronic submission at <https://comments.ustr.gov/s/>

*Re: Comment on Possible Extension of Certain Section 301 Product Exclusions:
China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual
Property Theft, and Innovation (Docket No. USTR-2024-0001)*

Dear Ambassador Tai:

TechNet appreciates the opportunity to comment on the possible extension of certain product exclusions from the tariffs levied on imports from China under Section 301 of the *Trade Act of 1974*. While we appreciate the U.S. Trade Representative's (USTR) interest in extending tariff relief, particularly on products needed to power critical and emerging technologies, we ask that the USTR prioritize concluding its statutory investigation of the tariffs and work to remove them altogether.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy by advocating a targeted policy agenda at the federal and 50-state level. TechNet's diverse membership includes dynamic American businesses ranging from startups to the most iconic companies on the planet and represents over 4.2 million employees and countless customers in the fields of information technology, artificial intelligence, e-commerce, the sharing and gig economies, advanced energy, transportation, cybersecurity, venture capital, and finance.

Recognizing the complexity of issues in the U.S.-China relationship, we urge the Administration to find ways to conclude the trade war with China and remove the harmful tariffs that U.S. importers continue to pay and pass along to American consumers. The tariffs have not met their intended goal and have cost American companies [\\$207.24 billion](#) since their inception in 2018. For years, the tariffs and the tariff exclusion process have caused tremendous uncertainty and turmoil for U.S. importers of all sizes, particularly small and medium-sized businesses.

Further, the tariffs impede economic growth, job creation, innovation, and, by extension, our global competitiveness. While we were pleased that USTR provided tariff relief for products essential to computing and electronics ecosystems and the manufacturing of critical and emerging technologies, we are concerned that such important products could be subjected to tariffs now or in the future. Some examples include automated data processing storage units, printed circuit assemblies to enhance the graphics performance of automatic data processing machines, and key fans, connectors, and conductors essential for computers (see appendix). From telecommunications equipment to industrial and automation equipment, TechNet strongly urges USTR to renew tariff exclusion exemptions on products that are essential for maintaining our global competitiveness and leadership in technology.

The U.S. should double down on our efforts to curb China's discriminatory practices by leveraging the support and engagement of our international partners and allies, especially with respect to critical and emerging technologies and market access. All of this should be done with a view toward minimizing supply chain disruptions that could harm American innovation and leadership, such as the Section 301 tariffs.

Thank you for your attention to our views.

Sincerely,



Peter Chandler
Senior Vice President, Federal Policy and Government Relations

Appendix

TechNet requests that the following products continue to be excluded from the Section 301 tariffs:

Product	U.S. HTS
Automated data processing storage units	8471706000
Printed circuit assemblies to enhance the graphics performance of automatic data processing (ADP) machines	8473301180
Printed circuit assemblies for rendering images onto computer screens	8473301180
Parts and accessories of machines of heading 8471, whether or not incorporating fan hubs or LEDs but not incorporating other goods of heading 8541 or 8542	8473305100
Insulated electric conductors for a voltage not exceeding 1,000 V, fitted with connectors of a kind used for telecommunications, each valued over \$0.35 but not over \$2	8544422000
Protective articles (goggles)	9004900090
Sacks and bags (including cones) of polymers of ethylene	3923210095
Messenger bags of polyester	4202128130
Backpacks with outer surface of textile materials of man-made fibers	4202923120