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VIA REGULATIONS.GOV

Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
U.S. Department of Commerce

RE: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Copper (X-RIN 0694-XC116, BIS-2025-0010)

Dear Mr. Astle,

The Consumer Technology Association (“CTA”) appreciates the opportunity to provide input to the Bureau of Industry and Security (“BIS”) regarding this investigation, pursuant section 232 of the Trade Expansion Act of 1962, to determine the effects on U.S. national security of imports of copper in all forms, including, but not limited to, derivative products.

CTA represents the more than \$537 billion U.S. consumer technology industry, which supports more than 18 million U.S. jobs. Our members are comprised of over 1200 companies from every facet of the consumer technology industry, including manufacturers, distributors, developers, retailers, and integrators, with 80 percent of CTA members being start-ups or small and mid-sized companies. CTA also owns and produces CES®—the most influential technology event in the world—which showcases and serves as a forum for discussion of international policies concerning existing and new technologies, international technology trade and investment, and global opportunities and challenges facing the consumer technology industry.

Copper in its various forms, such as wire, foil, and sheets, is a foundational input for consumer electronics products, and is equally essential to a vast range of other critical industries, such as construction, defense, home appliances and HVAC, transportation, and industrial machinery. Unsurprisingly, global demand for copper is expected to surge for the foreseeable future, with one projection estimating a 70 percent increase between 2024 to 2050, and a compound annual growth rate of 2.6 percent through 2035.

China accounts for more than half of global copper consumption, yet its production represents less than 10 percent of the total global output. China manipulates the global copper market through its domination of the smelting and processing segments of the production value chain. Copper prices are broadly understood to be subject to fluctuations based on the production plans of Chinese smelters. In this context, CTA encourages the Trump Administration to pursue

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measured, carefully considered mechanisms to ensure a balanced and sustainable global copper market.

That said, given the essential role of copper-containing products in the U.S. economy, CTA encourages the Administration to proceed with appropriate caution when considering the application of these, or other regulatory mechanisms, to copper derivatives. Raising the prices of such products based on their copper content would have a broadly inflationary impact on hardworking Americans. Further, accurately calculating any weight- or value-based will almost certainly prove difficult if not impossible, leading to a significantly compliance burden on importers and a dramatically increased workload for U.S. Customs, thus complicating enforcement.

Respectfully submitted,



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