1919 S. Eads St.
Arlington, VA 22202
703-907-7600
CTA.tech

October 21, 2025

Hon. Jeffrey Kessler
Under Secretary of Commerce for Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Adoption and Procedures of the Section 232 Steel and Aluminum Tariff Inclusions Process, Docket No. 250915-0134 (XRIN 0694-XC139)

Dear Under Secretary Kessler:

The Consumer Technology Association (CTA) appreciates the opportunity to provide comments to the Bureau of Industry and Security (BIS) in response to its process for including additional derivative aluminum and steel articles within the scope of the ad valorem duties.[1]

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. Over 142,000 people attended CES 2025, including over 57,000 from outside the United States.

I. CTA Urges BIS Not to Further Expand the Scope of the Section 232 Steel & Aluminum Tariffs

CTA strongly urges BIS not to expand the scope of the Section 232 steel and aluminum derivative tariffs. Further expansion would impose significant and unnecessary disruptions on U.S. manufacturers, especially within the consumer technology sector, without advancing

[1] *Notice of the Opening of the Inclusions Window for the Section 232 Steel and Aluminum Tariff Inclusions Process,* 90 Fed. Reg. 44799 (September 17, 2025).

legitimate national security objectives. Section 232 authorities should be applied only in narrowly tailored, evidence-based circumstances where a demonstrable threat to national security exists — not as a broad trade instrument affecting downstream industries that rely on affordable, high-quality materials.

Expanding tariffs on derivative products would intensify cost pressures across the economy, adding to the 34.8% surge in average metals prices recorded through September 2025 — an increase already amplified by these measures.[2] Extending 50 percent duties to a wider range of goods, such as auto components, electronics enclosures, machinery parts, and specialty inputs, would heighten production costs, exacerbate supply chain bottlenecks, and delay critical industrial and infrastructure projects. Such outcomes undermine, rather than strengthen, U.S. competitiveness and manufacturing resilience.

Additionally, expanding derivative tariffs on products that are already subject to other Section 232 actions, or that fall under ongoing investigations (such as semiconductors and core computing products), risk overlapping coverage and regulatory confusion. It could also preempt BIS determinations in related proceedings and unnecessarily burden companies with multiple, duplicative tariff obligations.

A more effective and sustainable strategy for securing U.S. industrial capacity would focus on cooperation with trusted allies and trading partners to address global overcapacity in steel and aluminum production — particularly from non-market economies. Working jointly with partners such as Canada, Mexico, the European Union, and Japan would bolster supply chain stability, promote fair market conditions, and ensure continued access to the materials that U.S. manufacturers need to compete globally. Targeted, collaborative approaches, rather than expansive tariffs, best serve U.S. economic and national security interests.

II. Current Supply Chain Vulnerabilities: Aluminum Plant Fire and Market Strain

The September 2025 fire at the Novelis aluminum plant in Oswego, New York — which supplies approximately 40 percent of the aluminum sheet used in the U.S. automotive industry — has significantly disrupted domestic supply.[3] The facility's hot mill is expected to remain offline until early 2026, forcing U.S. manufacturers to source aluminum sheet and related inputs from overseas suppliers, where imports now face a 50 percent tariff under Section 232.

This incident highlights the risks of overreliance on domestic production and the vulnerability of U.S. supply chains to unexpected disruptions. Expanding aluminum tariffs now would intensify

[2] The Budget Lab at Yale, *State of U.S. Tariffs,* (September 26, 2025), https://budgetlab.yale.edu/research/state-us-tariffs-september-26-2025.
[3] Forbes, *A Tier 1 Plant Fire Will Disrupt Auto OEMs For Months,* (October 8, 2025), https://www.forbes.com/sites/stevebanker/2025/10/08/a-tier-1-plant-fire-will-disrupt-auto-oems-for-months/

these pressures, restricting access to essential inputs and causing further delays in the automotive, transportation, and energy sectors.

Rather than strengthening U.S. industrial capacity, higher aluminum tariffs would raise costs and further strain supply chains for critical manufacturers. **In Annex III, CTA members have highlighted specific aluminum products and inputs affected by the Novelis plant fire. Given these circumstances, CTA strongly urges BIS to exclude the HTS codes listed in Annex III from the Section 232 Steel and Aluminum tariffs.** Excluding these essential inputs would help alleviate the burden on U.S. downstream manufacturers and support continuity in production.

III. U.S. Content Should be Excluded from Section 232 Tariffs

Under current CBP policy, products are exempt from Section 232 tariffs only if they are "made exclusively from steel melted and poured in the United States," or exclusively made from aluminum smelted and cast in the United States."[4] This strict interpretation creates significant challenges for manufacturers who are actively working to increase their use of U.S.-origin steel and aluminum while still needing to source some materials internationally due to technical specifications, availability, and cost considerations.

The current policy inadvertently penalizes companies for their efforts to support U.S. manufacturing. Even when a substantial percentage of U.S.-origin steel or aluminum is used in a product, manufacturers are unable to claim any tariff exemption because the policy requires 100 percent U.S. content. This creates a disincentive for companies to increase their use of U.S. origin steel and aluminum, contrary to the policy's goals.

Furthermore, the customs clearance system does not allow for the separate reporting of U.S. and non-U.S. origin materials. As a result, companies are forced to report all materials as non-U.S. origin to comply with CBP requirements, which means they incur unnecessary tariffs on the portion of materials that are in fact of U.S. origin. This reporting limitation undermines efforts to support U.S. origin content and creates an administrative burden that could be easily resolved.

IV. Issues with the Previous Steel and Aluminum Inclusions Window

The August 2025 expansion of Section 232 steel and aluminum tariffs, which added 407 new derivative products,[5] highlighted significant weaknesses in the inclusions process. Instead of strengthening national security, the expansion introduced uncertainty for manufacturers,

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[4] U.S. Customs and Border Protection, *Section 232 Tariffs on Steel and Aluminum Frequently Asked Questions,* https://www.cbp.gov/trade/programs-administration/entry-summary/232-tariffs-aluminum-and-steel-faqs

[5] *Adoption and Procedures of the Section2 32 Steel and Aluminum Tariff Inclusions Process,* 90 Fed. Reg. 40326, (August 19, 2025).

disrupted established supply chains, and imposed additional administrative burdens on industries already facing cost pressures.

The first inclusions window suffered from unclear procedures and limited transparency. Guidance on implementation and eligibility was fragmented, leaving stakeholders with little time to respond effectively. This lack of clarity hindered meaningful public participation and created operational challenges for companies attempting to submit comments in good faith.

Further concerns arose when BIS added HTS codes outside the original public comment period, including household appliances. These additions occurred after stakeholders had already submitted rebuttals and appeared to rely on prior presidential proclamations rather than the merits of the public process. Previous CBP communications also indicated that many of these codes were already flagged for inclusion, raising questions about whether decisions were made in advance of public input.

Substantively, many proposed derivative HTS codes included products with minimal steel or aluminum content. CTA analysis shows that, for a majority of these codes, less than half of the product's value derives from steel or aluminum, falling short of the derivative article definition requiring at least two-thirds of material cost to be steel or aluminum.[6] Including such products undermines the rationale for the tariffs and illustrates the need for more precise, criteria-driven standards.

These procedural and substantive deficiencies erode stakeholder confidence in the inclusions framework and underscore the need for a transparent, consistent, and evidence-based process in future rounds.

V. CTA Recommendations for a Transparent, Objective, and Balanced Inclusions Process

The Inclusions Process Must Be Objective and Criteria-Based

The inclusions process should operate according to clearly established, consistently applied criteria to ensure objectivity and fairness. BIS should publish transparent, evidence-driven standards for evaluating inclusion requests, including specific justification for each proposed HTS code. Requests lacking individualized rationale or relying on generalized justifications across multiple codes should be disregarded.

[6] See Adjusting Imports of Derivative Aluminum Articles and Derivative Steel Articles into the United States, 85 Fed. Reg. 5,281, 5,282 (Jan. 29, 2020) (emphasis added)

CTA recommends that BIS adopt a formal "ground rule" prohibiting consideration of inclusion requests for products that do not meet the derivative article definition or for products with declining import volumes, as these do not pose a threat to national security. A presumption of denial should also apply to products previously considered and rejected, promoting predictability and efficiency.

Transparency must be reinforced by providing stakeholders with sufficient notice of deadlines, decision criteria, and any changes in scope. Decisions should follow careful consideration of public comments rather than predetermined conclusions, and input from stakeholders advocating for fewer inclusions should be weighed equally alongside requests for expansion.

By applying objective criteria, enforcing a clear ground rule, ensuring transparency, and maintaining procedural fairness, BIS can establish an inclusions process that is predictable, evidence-based, and balanced, while restoring confidence among stakeholders. CTA and other industry associations previously demonstrated these concerns in a joint letter to Secretary Lutnick in June.[7]

Extend the Public Comment Period to Enable Meaningful Stakeholder Engagement

CTA recommends that BIS extend the public response period for inclusion requests to at least 45 days. This timeframe will allow stakeholders to analyze commercial and operational impacts comprehensively, review import data, and coordinate feedback across complex supply chains.

The 14-day response window used in the first two inclusions periods was insufficient for meaningful engagement, especially given the breadth of the HTS codes proposed. BIS should also ensure that future inclusion dockets are fully searchable by HTS code and product description, enabling stakeholders to efficiently identify relevant entries and provide targeted, data-informed input.

Provide a Post-Decision Comment Opportunity and Establish a Periodic Review Mechanism

BIS should create a 30-day comment opportunity following the Decision Phase, allowing stakeholders to review and respond to the full list of approved inclusions and BIS's underlying rationale. This will ensure transparency, enable corrections to factual errors, and allow BIS to assess cumulative economic and national security impacts rather than evaluating inclusions in isolation.

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[7] *Multi-Association Letter on Section 232 Steel and Aluminum Derivatives Inclusion Process,* (June 16, 2025), https://www.cta.tech/media/bfvezqk4/final-multi-association-letter-on-section-232-steel-and-aluminum-derivatives-inclusion-process.pdf

In addition, BIS should establish a formal periodic review process to remove products from the derivative tariff list when market conditions change or when inclusion causes undue harm to downstream industries. Products should remain subject to Section 232 duties only for a limited duration, subject to renewal based on updated evidence.

This framework would maintain alignment between economic realities and national security goals, preventing indefinite application of tariffs that no longer serve their intended purpose.

Limit the Scope of Inclusions to Specific Products

BIS should narrowly define any approved inclusions to apply only to specific products containing steel or aluminum rather than entire HTS subheadings. Overly broad inclusions impose significant documentation and compliance burdens even for importers whose products contain no covered materials.

When drafting Chapter 99 annex language, BIS should ensure that Section 232 derivative tariff classifications apply only to imports demonstrably containing steel or aluminum. BIS should also establish an exclusion mechanism — similar to the Section 301 process — allowing stakeholders to petition for removal of products inadvertently captured under broad HTS categories. This mechanism would help correct administrative overreach and reduce unnecessary compliance costs.

Establish a De Minimis Content Threshold for Steel and Aluminum

CTA recommends that BIS adopt a de minimis content threshold — a nominal percentage below which the steel or aluminum content of a product would not trigger Section 232 duties. Such thresholds are common in free trade agreements and ensure that tariffs focus on products where the metal content is commercially significant.

Imposing duties on minimal content, such as a zipper, wall bracket, or screw, creates disproportionate burdens on importers, manufacturers, and U.S. Customs and Border Protection (CBP). The administrative costs of verification and enforcement often exceed the value of the duties collected. A de minimis threshold would ensure tariffs are targeted and proportionate while preserving national security objectives.

This measure would also provide predictability for businesses, particularly small and mid-sized enterprises that lack the compliance capacity or supplier visibility to trace minimal metal content through multi-tiered supply chains.

Recognize the Complexity of Material Tracing and Valuation in Derivative Products

The supply chains for consumer technology products are highly complex, involving numerous materials and suppliers. Determining the specific quantity or value of steel and aluminum within each derivative often requires specialized analysis, particularly where metal content is attributable solely to packaging, brackets, or fasteners.

Imposing tariffs based on incidental metal content imposes excessive operational burdens and increases transaction and enforcement costs. These requirements run counter to the Administration's broader goals of reducing regulatory burdens and promoting efficient trade facilitation.

Moreover, processes such as coatings, treatments, and component substitutions can alter the material composition of finished products. BIS should therefore narrowly define derivative articles and avoid the use of overly broad HTS codes that capture unintended items.

Address Disproportionate Burdens on Small and Medium-Sized Enterprises

Small technology companies and startups face particular challenges in determining the precise value and composition of steel or aluminum in their products. These firms typically lack in-house compliance teams, financial resources, and access to proprietary supplier data needed for detailed material tracing.

BIS should take these constraints into account when designing the inclusions process and ensure it provides clarity, flexibility, and predictability for small and mid-sized enterprises. Policies that inadvertently penalize smaller firms will undermine innovation and competitiveness across the U.S. technology sector.

VI. Conclusion

CTA appreciates the opportunity to provide comments to BIS on including additional derivative steel and aluminum articles within the scope of Section 232 tariffs. We strongly urge BIS not to expand the scope of these duties, as further expansion would impose unnecessary costs, administrative burdens, and supply chain disruptions on U.S. manufacturers, particularly in the consumer technology sector, without advancing legitimate national security objectives. Rising metals prices, overlapping coverage with other Section 232 actions, regulatory uncertainty, and disruptions such as the September 2025 fire at the Novelis aluminum plant in Oswego, New York, which has impacted domestic supply chains, all underscore why expanding the derivative tariff scope would be harmful.

In this context, CTA urges BIS to exclude the HTS codes identified in Annex I, which should not be considered for inclusion, Annex II, which identifies HTS codes included in the prior inclusions process that should now be removed, and Annex III, which includes HTS codes affected by the Oswego aluminum fire. U.S. origin content should also be excluded from Section 232 steel and aluminum tariffs.

We encourage BIS to adopt a transparent, objective, and evidence-based inclusions process that allows meaningful stakeholder engagement, ensures decisions are clear and predictable, and balances national security objectives with the practical realities of U.S. manufacturing. Such an approach would foster confidence among stakeholders and help prevent unnecessary disruptions to supply chains, costs, and competitiveness.

In closing, CTA thanks BIS for its attention to these issues and for providing stakeholders the opportunity to participate in this process. We remain committed to working with the agency to ensure that Section 232 measures are applied in a manner that supports U.S. competitiveness, industrial resilience, and a fair, administrable trade environment.

Sincerely,

Ed Brzytwa
Vice President of International Trade
Consumer Technology Association

Michael Petricone
Senior Vice President of Government Affairs
Consumer Technology Association

Annex I
HTS Codes BIS Should Decline to Include from the Current Section 232 Steel and Aluminum Inclusions Window

HTS Code	Product Description
3923.90.0080	Articles for the conveyance or packing of goods, etc, of plastic, nesoi
3924.90.56	Plastics, household articles nspf elsewhere, other
3925.90.0000	Speaker wall mount
3926.90.30	Parts for yachts or pleasure boats of heading 8903 and watercraft not used with motors or sails, of plastics
3926.90.99	Other articles of plastics and articles of other materials of headings 3901 to 3914
3926.90.9989	Other articles of plastics and articles of other materials of headings 3901 to 3914
4202.12.21	Trunks, suit/vanity case, plastic, structured, rigid on all side
4821.10.2000	Paper and paperboard labels of all kinds printed in wholly or in part by a lithographic process
4821.10.4000	Paper and paperboard labels of all kinds, printed, nesoi
4821.90.2000	Paper and paperboard labels, unprinted, pressure-sensitive
4823.90.8680	Paper, paperboard, cellulose wadding and webs of cellulose fibers, cut to size or shape; articles thereof, nesoi
5609.00.3000	Articles of yarn, twine, cordage, ropes, cables, plaiting materials and articles thereof, of man-made textile materials
7307.21.50	Stainless steel, not cast, flanges for tubes/pipes, not forged or forged and machined, tooled and otherwise processed after forging
7307.22.10	Stainless steel, not cast, threaded sleeves (couplings) for tubes/pipes
7307.22.50	Stainless steel, not cast, threaded elbow and bends for tubes/pipes
7307.29.00	Pneumatic end effector Fitting for compression cup
7307.92.30	Iron or steel (o/than stainless), not cast, threaded sleeves (couplings) for tubes/pipes
7307.99.50	Iron/steel (o/than stainless), n/cast, fittings for tubes/pipes, nesoi, not forged or forged and machined, tooled & processed after forging
7326.90.8688	Calibration plates
7308.90.9590	Support frames, kiosk frames, panels, platforms, handrails, mounting brackets, station kits
7323.92.00	Table, kitchenware, cast iron, enameled, other
7323.93.00	Household articles, of stainless steel; not cook kitchen ware
7323.99.90	Household art.n/platd w/prec metals, n/ckware, gates, chld/pets
7326.90.86	Articles of iron or steel: nspf
7616.99.51	Support frames, kiosk frames, panels, platforms, handrails, mounting brackets, station kits
7616.99.5160	Aluminum castings
7616.99.5190	Other articles of aluminum
8204.11.00	Adjusting tools for torque wrenches
8204.12.00	Hand-operated spanners and wrenches (including torque meter wrenches but not including tap wrenches); socket wrenches, with or without handles, drives or extensions; base metal parts thereof: Adjustable, and parts thereof

8204.20.00	Socket wrenches, with or without handles, drives and extensions, and parts thereof
8206.00.00	Tools of two or more of headings 8202 to 8205, put up in sets for retail sale
8302.42.3015	Lens covers, monitor shrouds
8302.50.00	Hat-racks, hat pegs, brackets and similar fixtures, and part
8303.00.00	Armored or reinforced safes, strong-boxes etc. Of base metal
8307.10.30	Iron or steel flexible tubing, with fittings
8309.90.0080	Fittings for loose-leaf binders or files; paper clips; office binder clips; staples in strips; other articles of base metal
8412.21.00	Hydraulic power engines and motors, linear acting (cylinders)
8412.31.0040	Actuator Pneumatic, 25MM Stroke 500MM Accumulator pneumatics kit
8412.31.0080	Actuator Pneumatic, 25MM Stroke 500MM Accumulator pneumatics kit
8413.70.20	Centrifugal pumps for liquids, not fitted with a measuring device, nesoi
8414.59.65	Other fans, nesoi, axial
8414.80.90	Air or gas pumps, compressors and fans, nesoi
8418.69.01	Drinking water coolers, selfcontained
8418.69.0180	Refrigerating or freezing equipment, nesoi
8418.99.8060	Freezer basket
8419.50.50	Heat exchange units, nesoi
8419.89.95	Industrial machinery, plant or equipment for the treatment of materials, by process involving a change in temperature, nesoi
8428.90.03	Lift for drive unit conveyer system
8430.20.00	Snow blower
8450.90.20	Tub and tub assemblies for household- or laundry-type washing machines
8451.80.00	Machinery for the handling of textile yarns, fabrics or made up textile articles, nesoi
8466.94.65	Other specified parts and accessories for machines of heading 8462 or 8463, nesoi
8466.94.85	Other parts and accessories for machines of heading 8462 or 8463, nesoi
8471	Automatic data processing machines and units thereof; magnetic or optical readers, machines for transcribing and processing coded data, others
8471.60.90	Other units nspf, other than output devices
8471.60.9050	Automatic data processing machines and units thereof; input or output units, whether or not containing storage units in the same housing
8473.30.0000	Parts and accessories for automatic data processing machines and units thereof, magnetic or optical readers, machines for transcribing and processing coded data, others.
8473.30.0002	Parts and accessories for machines of heading 8471
8473.30.0051	Parts and accessories for machines of heading 8471
8473.30.5100	Parts and accessories of the machines of heading 8471, nesoi
8473.30.5100	Parts and accessories (other than covers, carrying cases, and the like) suitable for use solely or principally with machines of heading 8471: not incorporating a cathode ray tube: other
8477.90.8695	Parts of machinery for working rubber or plastics or for the manufacture of products from these materials, nesoi

8483.40.50	Fixed, multiple and variable ratio speed changers, not imported for use with machines for making cellulosic pulp, paper or paperboard
8479.89.95	Other machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84, nesoi
8479.90.9596	Other parts of machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84; nesoi
8480.79.9090	Molds, nesoi, for rubber or plastics
8483.10.10	Camshafts and crankshafts for use solely or principally with spark-ignition internal-combustion piston or rotary engines
8483.10.1050	Camshafts and crankshafts for use with spark-ignition internal combustion piston engines or rotary engines, nesoi
8483.50.9040	Grooved pulleys, nesoi
8483.90.5080	Product not imported into the USA in 2024
8483.90.8080	Parts of clutches, universal joints, pulleys, flywheels and transmission shafts; nesoi
8501.52.40	Servomotor
8503.00.95	Other parts, nesoi, suitable for use solely or principally with the machines in heading 8501 or 8502
8504.22.0080	Liquid dielectric transformer having a power handling capacity exceeding 2,500 kva but not exceeding 10,000 kva
8507.9080.00	Electric storage batteries, including separators therefor, whether or not rectangular (including square)
8507.90.8000	Storage battery parts (except lead-acid type)
8516.10.0040	Electric storage water heaters
8516.90.80	Parts of domestic electrothermic cooking stoves, ranges and ovens of subheading 8516.60.40, other nesoi
8544.20.00	Coaxial cable and other coaxial electric conductors
8544.30.00	Insulated ignition wiring sets and other wiring sets of a kind used in vehicles, aircraft or ships
8544.42.20	Other electric conductors, for a voltage not exceeding 1,000 V: Of a kind used for telecommunications
8544.42.90	Extension cords as defined in statistical note 6 to this chapter
8544.49.20	Insulated electric conductors nesoi, for a voltage not exceeding 80 V, not fitted with connectors
8544.49.30	Power supplies for automatic data processing machines or units thereof of heading 8471; power supplies for goods of subheading 8443.31 or 8443.32
8544.60.20	Insulated (including enameled or anodized) wire, cable (including coaxial cable) and other insulated electric conductors, whether or not fitted with connectors; optical fiber cables, made up of individually sheathed fibers, whether or not assembled with electric conductors or fitted with connectors:
8544.30	Satellite harnesses
8544.42.20	Insulated electric conductors nesoi, used for telecommuncations, for a voltage not exceeding 1,000 v, fitted with connectors. Conductor: fit w/modular telephone connector; other
8544.70	GGT optical cables
8544.42.90	Insulated electric conductors nesoi, for a voltage not exceeding 1,000 v, fitted with connectors, nesoi
8544.49.20	Insulated electric conductors nesoi, for a voltage not exceeding 80 V, not fitted with connectors

8544.49.90	Insulated electric conductors nesoi, not of copper, for a voltage not exceeding 1,000 V, not fitted with connectors
8544.60.20	Insulated electric conductors nesoi, for a voltage exceeding 1,000 V, fitted with connectors
8546.90.0000	Electrical insulators, nesoi
8711	Bikes
8712	Bikes
8906.90.00	Vessels (including lifeboats other than row boats), nesoi
9401.71.00	Upholstered seats with metal frames, infant walkers
9401.79.00	Outdr seat w/mtl frm, w/text covr cushion/seat/back, househld
9403.20.00	Other, countrs, lockrs, racks, display cases, shelves, partitions
9403.70.80	Other plastic furniture
9403.99.90	Oth furniture parts, of metal, prts for steel rack, other
9403.99.9045	Furniture parts of metal, nesoi

Annex II
HTS Codes BIS Should Exclude That Were Included in the Previous Round of Section 232 Steel and Aluminum Inclusions

HTS Code	Product Description
3402.50.5100	Surface-active, washing & cleaning preparations, whether or not containing soap, put up for retail sale, not elsewhere specified or included
3506.91.50	Adhesives based on polymers of headings 3901 to 3913 or on rubber
3926.90.9989	Other articles of plastics and articles of other materials of headings 3901 to 3914
7616.99.5190	Other articles of aluminum
7616.99.51	Aluminum, articles, nesoi
8205.59.55	Other
8302.10.60	Hinges, and parts thereof
8302.50.00	Hat-racks, hat pegs, brackets and similar fixtures, and parts thereof
8302.42.30	Iron or steel, aluminum, or zinc mountings, fittings & similar articles, suitable for furniture, and base metal parts thereof
8302.49.60	Iron or steel, aluminum, or zinc, mountings, fittings & similar articles nesoi, and base metal parts thereof
8302.50.0000	Hat-racks, hat pegs, brackets and similar fixtures, and part
8305.20.00	Base metal staples in strips (e.g., for offices, upholstery, packaging)
8307.10.60	Flexible tubing of base metal, with or without fittings
8407.21.00	Marine propulsion spark-ignition reciprocating or rotary internalcombustion piston engines for outboard motors
8409.91.50	Parts suitable for use solely or principally with spark-ignition internal combustion piston engines (including rotary engines)
8409.91.92	Parts nesoi, used solely or principally with spark-ignition internal-combustion piston engines for marine propulsion
8409.91.99	Parts suitable for use solely or principally with spark-ignition internal combustion piston engines (including rotary engines)
8409.99.92	Parts suitable for use solely or principally with compression-ignition internal combustion piston engine "diesel or semi-diesel engine"
8412.21.00	Hydraulic power engines and motors, linear acting "cylinders"
8412.29.80	Hydraulic power engines and motors (excluding hydraulic turbines and water wheels of heading 8410, steam turbines and hydraulic power engines and motors, linear acting)
8413.81.00	Pumps for liquids, not fitted with a measuring device, nesoi
8414.59.65	Other fans, nesoi, axial
8414.90.41	Parts of air or gas compressors, nesoi
8415.10.30	Window or wall type air conditioning machines, self-contained
8415.10.60	Window or wall type air conditioning machines, split-system, incorporating a refrigerating unit & valve for reversal of cooling/heat cycle
8415.81.01	Air conditioning machines incorporating a refrigerating unit and valve for reversal of cooling/heat cycle, nesoi
8415.82.01	Air conditioning machines incorporating a refrigerating unit, nesoi
8415.90.40	Chassis, chassis bases and other outer cabinets for air conditioning machines,

8418.10.00	Combined refrigerator-freezers, fitted with separate external doors, electric or other
8418.21.00	Refrigerators, household compressiontype, electric or other, other than those of subheading 8418.10
8418.30.0000	Freezers of the chest type, not exceeding 800 liters capacity
8418.40.0000	Freezers of the upright type, not exceeding 900 liters capacity
8418.99.40	Certain door assemblies for refrigerators, freezers and other refrigerating or freezing equipment
8418.99.8050	Parts of combined refrigerator- freezers fitted with separte external dorrs and parts of household type refrigerators
8418.99.8060	Parts of refrigerators, freezers and other refrigerating or freezing equipment, nesoi
8419.50.10	Brazed aluminum plate-fin heat exchangers
8419.50.50	Parts of : air or vacuum pumps, air or other gas compressors, fans and ventilating or recycling hoods incorporating a fan, n.e.s.
8419.50.5000	Heat exchange units, nesoi
8421.29.00	Machinery and apparatus for filtering or purifying liquids (excluding such machinery and apparatus for water and other beverages, oil or petrol-filters for internal combustion engines and artificial kidneys)
8421.29.0065	Filtering or purifying machinery and apparatus for liquids, nesoi
8421.29.0065	Filtering or purifying machinery and apparatus for liquids, nesoi
8422.11.0000	Dishwashing machines; of the household type
8427.10.80	Self-propelled works trucks powered by an electric motor, fitted with lifting and handling equipment, nesoi
8428.39.00	Continuous-action elevators and conveyors, for goods or materials, nesoi
8433.11.0010	Electric mowers, including battery operated, powered, with the cutting device rotating in a horizontal plane
8450.11.00	Household- or laundry-type washing machines, each of a dry linen capacity not exceeding 10 kg, fully automatic
8451.21.00	Drying machines, each of a dry linen capacity not exceeding 10 kg
8467.22.0040	Electric hand saws, chain type
8467.22.0070	Electric hand saws, reciprocating and jig types
8467.22.0090	Electric hand saws, nesoi
8467.29.0010	Electric hand angle grinders, sanders & polishers
8467.29.0040	Electric hand screwdrivers, nut-runners, impact wrenches
8467.29.0055	Electric hand routers
8467.29.0070	Electric hand grass and weed trimmers/edgers
8467.29.0080	Electropneumatic hand rotary & percussion hammers
8467.29.0090	Other electromechanical hand tools
8473.30.5100	Parts and accessories of the machines of heading 8471, nesoi
8479.89.95	Other machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84, nesoi
8479.89.95	Machines and mechanical appliances having individual functions, not specified or included elsewhere in this chapter; parts thereof
8479.90.95	Parts of machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84, nesoi

8479.90.9596	Other parts of machines and mechanical appliances having individual functions, not specified or included elsewhere in chapter 84; nesoi
8480.71.8045	Injection type molds for rubber or plastics, nesoi
8482.10.50	Ball bearings other than ball bearings with integral shafts
8482.99.15	Ball or roller bearings, and parts thereof: For tapered roller bearings
8483.10.50	Transmission shafts and cranks other than camshafts and crankshafts
8483.20.40	Flange, take-up, cartridge and hanger units
8483.20.80	Housed bearings, incorporating ball or roller bearings: other
8483.30.40	Bearing housings; plain shaft bearings: Flange, take-up, cartridge and hanger units
8483.30.80	Bearing housings nesoi; plain shaft bearings
8483.40.90	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements entered separately
8483.50.60	Flywheels, nesoi
8483.50.90	Pulleys, including pulley blocks, nesoi
8483.60.40	Clutches and universal joints
8483.60.80	Toothed wheels, chain sprockets and other transmission elements presented separately; parts of transmission shafts, ball screws, couplings and other articles of heading 8483, n.e.s.
8483.90.30	Toothed wheels, chain sprockets and other transmission elements presented separately; parts:
8483.90.50	Parts of gearing, gear boxes and other speed changers
8483.90.80	Toothed wheels, chain sprockets and other transmission elements presented separately; parts of transmission shafts, ball screws, couplings and other articles of heading 8483
8450.20.0040	Household or laundry-type washing machines; each of a dry linen capacity exceeding 10 kg; other; top loading
8451.29.0090	Drying machines; other
8473.30.5100	Parts and accessories for machines of heading 8471
8503.00.65	Stators and rotors for electric motors & generators of heading 8501, nesoi
8503.00.95	Other parts, nesoi, suitable for use solely or principally with the machines in heading 8501 or 8502
8504.31.40	Electrical transformers other than liquid dielectric, having a power handling capacity less than 1 kVA
8504.90.96	Parts of electrical transformers and inductors, n.e.s.
8516.29.00	Electric space heating apparatus and electric soil heating apparatus, other than storage heating radiators
8516.60.4070	Cooking stoves, ranges and ovens; microwave oven combinations
8516.90.80	Parts of domestic electrothermic cooking stoves, ranges and ovens of subheading 8516.60.40, other nesoi
8538.10.0000	Panels, boards, bases for goods of 8537
8544.42.9010	Extension cords as defined in statistical note 6 to this chapter, for a voltage not exceeding 1000 volts, fitted with connectors
8544.42.90	Parts of electrical transformers and inductors, n.e.s.
8544.42.9090	Insulated electric conductors, for a voltage not exceeding 1000 volts, fitted with connectors, nesoi
8544.49.20	Insulated wire, cable
8544.49.90	Electric conductors, for a voltage = 1.000 V, insulated, not fitted with connectors, n.e.s.

8544.60.20	Electric conductors, for a voltage 1.000 V, insulated, n.e.s.
8711.60.0090	0 Motorcycles (including mopeds) and cycles fitted with electric motors for propulsion, nesoi
8716.39.00	Trailers and semi-trailers, not mech. propelled, nesoi, for the transport of goods
9403.20.00	Metal furniture (excluding for offices, seats and medical, surgical, dental or veterinary furniture)
9403.20.0050	Other, countrs, lockrs, racks, display cases, shelves, partitions
9403.99.90	Parts of furniture (o/than seats or o/than of 9402) nesoi
9506.91.0010	Exercise cycles
9506.91.0020	Exercise rowing machines
9506.91.0030	Gymnasium, or other exercise articles and equipment, parts and accessories thereof, nesoi

Annex III
HTS Codes Impacted by the Oswego Aluminum Plant Fire that Should be Excluded

HTS Code	Product Description
7606.12.3091	Heat-treatable industrial alloys of a kind described in statistical note 7 to this chapter
7606.12.3096	Aluminum plates, sheets and strip, of a thickness exceeding 0.2 mm: Other
7606.92.3035	Aluminum plates, sheets and strip, of a thickness exceeding 0.2 mm: Of aluminum alloys: With a thickness of 6.3 mm or less