

ZACHARY W. PAULSEN
202.887.4061/fax: 202.887.4288
zpaulsen@akingump.com

October 16, 2012

Ms. Neena Shenai
International Trade Counsel
Committee on Ways and Means
U.S. House of Representatives
1104 Longworth House Office Building
Washington, DC 20515

Mr. Jason Kearns
International Trade Counsel
Committee on Ways and Means
U.S. House of Representatives
1106 Longworth House Office Building
Washington, DC 20515

Dear Ms. Shenai and Mr. Kearns:

On behalf of Hunter Douglas, the leading manufacturer of custom-made window fashions in North America, I am writing in regards to objections received by the Committee on Ways and Means concerning H.R. 4590 and H.R. 4591, legislation sponsored by Rep. Sue Myrick of North Carolina to temporarily suspend the tariffs on imports of plaiting materials and products of plaiting materials suitable for use in window shades.

During the committee's public comment period, B&W Window Fashions submitted a letter objecting to the inclusion of these two bills in the process commonly known as the Miscellaneous Tariff Bill (MTB). Importantly, B&W Window Fashions is not objecting on the grounds of domestic production. Rather, the company is objecting to the legislative description of the bills, specifically that the nomenclature is too narrowly worded to include material imported by B&W Window Fashions. The same company also submitted the identical objection to the U.S. International Trade Commission (ITC) during its administrative vetting process.

It is our understanding that the strict guidelines of the MTB process have traditionally dismissed objections similar to those made by this company. As you well know, the MTB process is available to all U.S. importers and the legislative descriptions of duty suspension provisions are commonly worded like H.R. 4590 and H.R. 4591 in an effort to limit the overall costs of the legislation, e.g. by expanding the coverage of the duty suspension, individual provisions would typically fail to qualify under the *de minimis* revenue impact threshold, another pillar of the MTB process.

In addition, the bill report conducted by the ITC for H.R. 4591 indicated that J.C. Penney Corp. manufactures the covered import domestically. In direct discussions with the ITC, the commission's analyst confirmed that the indication in the bill report was a typographical error.

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These duty suspension bills are important to Hunter Douglas, and we certainly appreciate your leadership and commitment to the integrity of MTB process. The MTB helps companies like Hunter Douglas remain competitive in the global marketplace and supports American jobs.

We hope this information concerning these meritless objections is helpful, and we look forward to working with you to ensure H.R. 4590 and H.R. 4591 are ultimately included in the omnibus MTB package currently under consideration.

Best regards,



Zachary W. Paulsen

cc: Office of the Honorable Sue Myrick
United States House of Representatives

Office of the Honorable Kay Hagan
United States Senate