



July 31, 2012

The Honorable Max Baucus  
Chairman  
Senate Committee on Finance  
219 Dirksen Senate Office Building  
Washington, DC 20510

The Honorable Dave Camp  
Chairman  
Committee on Ways and Means  
1101 Longworth House Office Building  
Washington, DC 20515

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Re: Anatase-type Titanium Dioxide in Miscellaneous Tariff Bill — H.R. 5196

Dear Chairmen Baucus and Camp:

I am writing on behalf of INVISTA in response to DuPont's June 22, 2012 letter to you opposing the inclusion of anatase-type titanium dioxide (a specialized form of titanium dioxide used by several manufacturers in the U.S.) contained in H.R. Bill 5196 for inclusion in the overall Miscellaneous Tariff Bill ("MTB").

INVISTA does not believe that DuPont's letter represents a valid opposition to this bill for the following reasons:

First, nowhere does DuPont contend that it (or any other company) actually manufactures anatase-type titanium dioxide in the United States. INVISTA has been unable to identify any domestic production of anatase-type titanium dioxide that would allow us to avoid the duty which is assessed today. The imposition of this duty results in the U.S.-manufactured products produced in our plants in Camden, SC and Chattanooga, TN manufacturing facilities less competitive in the international marketplace as we have no alternative to importing the raw material and incurring additional cost because of the duty.

Second, DuPont does not contend that the type of titanium dioxide which is produced in the United States (called rutile-type) can serve an adequate substitute for the anatase-type titanium dioxide we import. INVISTA does not believe that such substitution has occurred or is practical.

Finally, DuPont's references to additional production of titanium dioxide in China are simply irrelevant given there is no domestic production of the product specified in H.R. 5196.

We have asked DuPont to withdraw their objection to the specialized form of anatase-type titanium dioxide imported by several U.S. manufacturers since there are no domestic sources, but they have indicated it is their intention not to do so.

As you are aware, the Misc. Tariff Bill is simple duty relief legislation which would offer a limited exemption for an imported raw material for which there is no domestic alternative supply source. A tariff on imported raw materials used by U.S. manufacturers for which there is no domestic source places U.S. manufacturers at a competitive disadvantage.

Very truly yours,

A handwritten signature in blue ink that reads "Roger Ramseyer".

Roger Ramseyer  
Managing Director  
INVISTA Government & Public Affairs

cc: The Honorable Mick Mulvaney, U.S. House of Representatives  
Lawrence Johnson, U.S. International Trade Commission