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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 an objection received by the Committee on Ways and Means concerning H.R. 4828, legislation sponsored by Rep. Alan Nunnelee of Mississippi to temporarily suspend the tariff on imports of aluminum alloy profiles of alloy 6011 suitable for use in the manufacture of window shades.

During the committee's public comment period, the American Foundry Society (AFS) submitted a letter objecting to the inclusion of this bill in the process commonly known as the Miscellaneous Tariff Bill (MTB). The AFS objection is based on the premise that H.R. 4828 covers aluminum castings, which are made domestically. However, H.R. 4828 explicitly states that the legislation covers aluminum alloy profiles of alloy 6011; the legislation does not cover castings asserted by AFS. Furthermore, neither the profiles covered by the legislation, nor alloy 6011, is available in the United States. The AFS 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 the AFS in the past. As you well know, objections on the grounds of domestic production must be for the same, like or competitive product covered by the proposed legislation. In this case, the basis for the AFS objection – that aluminum castings are made domestically – is irrelevant as H.R. 4828 does not attempt to suspend the tariff on aluminum castings.

On behalf of Hunter Douglas, the initial requesting company of this legislation, we have repeatedly attempted to clarify this matter with the American Foundry Society. However, the association has been unresponsive.

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This duty suspension legislation is 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 the objection to H.R. 4828 is helpful, and we look forward to working with you to ensure that this bill is ultimately included in the omnibus MTB package currently under consideration.

Best regards,



Zachary W. Paulsen

cc: Office of the Honorable Alan Nunnelee  
United States House of Representatives