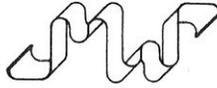


MIRWEC

FILM INC.



May 23, 2012

To the House Ways and Means Committee:

I am writing in opposition to H.R. 4534, "To extend the temporary suspension of duty on biaxially oriented polypropylene film."

Mirwec Film, Inc. is a manufacturer of biaxially oriented polypropylene film for use in the high voltage capacitors for power transmission and distribution equipment. Our plant is located in Bloomington, Indiana. We produce rough surface film from 40 gauge to 80 gauge in thickness. (10.2 μ - 20.3 μ)

In 2010, this special code was added to the Harmonized Tariff Schedule in response to a request by a company that produces metallized capacitor film. We do not compete with them in the metallized film market. However, as the special code is written and now exists in the HTS, it makes not only this film for metallizing duty free, but also film that directly competes with our products is duty free. When the tariff on our product was eliminated two years ago, it was a serious blow to our market position. We have lost volume and market share in the last two years and therefore object to the renewal of this duty suspension in its current form.

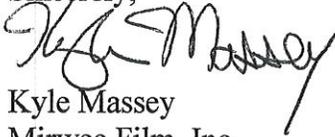
At the end of the 111th Congress, we worked with the USITC and with the Department of Commerce to make a technical correction to the HTS. The correction was vetted by the USITC, Commerce Department and US Customs. It was included in the House-passed version of H.R. 6517 in the 111th Congress, but was stripped from the final bill. The language of the correction is as follows:

Biaxially Oriented Polypropylene Dielectric Film- Heading 9902.25.75 is amended by striking the article description and inserting the following: 'Biaxially oriented polypropylene film, certified by the importer as intended for metallization and use in capacitors, or certified by the importer as below 40 gauge (10.2 micrometers), not intended for metallization and intended for use in capacitors, all of the foregoing produced from solvent-washed low ash content (less than 50 ppm) polymer resin (CAS No. 9003-07-0) (provided for in subheading 3920.20.00).'

This language protects our business and our products while allowing others who do not compete with us to receive the duty free benefit that they need to further grow their own businesses. If H.R. 4534 were worded as shown above, in agreement with the technical correction from House passed version of H.R. 6517 from the 111th Congress, we would not object to this bill.

In summary, if H.R. 4534 is left in its current form, we oppose it and ask you to oppose the extension of the duty suspension on this material. However, if the bill includes the language from the technical correction, we would not oppose it and encourage you to include it in the forthcoming Miscellaneous Tariff Bill. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle Massey". The signature is stylized and written over the printed name.

Kyle Massey
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