

June 22, 2012

BEFORE THE HOUSE WAYS AND MEANS COMMITTEE

COMMENTS SUBMITTED BY L.L.BEAN, INC.

REGARDING CERTAIN MISCELLANEOUS TARIFF BILLS¹

These comments are submitted by L.L.Bean, Inc. of Freeport Maine in connection with various Miscellaneous Tariff bills (MTB's) being considered by Congress. By way of background, L.L.Bean operates manufacturing facilities in Brunswick and Lewiston Maine where we produce a variety of models of the iconic Maine Hunting Shoe or Bean Boot – the product that gave rise to our Company in 1912 – 100 years ago. Our facilities directly employ more than 400 people in the production of more than 3 dozen styles of the Bean Boot.

We respectfully submit that the following language be inserted into any MTB being considered by the Committee in connection with any existing or existing MTB's being considered by Congress to reduce or eliminate import duties for footwear (including footwear components) classified under headings 6401, 6402 and 6403:

Tariff reduction or elimination do not include vulcanized footwear or “protective footwear or protective footwear components” or “waterproof footwear” or “waterproof molded footwear bottoms.” The terms “protective footwear and “protective footwear components” means footwear and bottom components classified in HTSUS heading 6402 which are designed to protect against penetration by water or other liquids and designed to be combined with tops made of any material to form finished footwear; the term “waterproof molded footwear bottoms” means footwear bottom components classified in HTSUS heading 6401; the term “tops” means that component or portion of the footwear upper which is attached to waterproof footwear bottoms or protective footwear components by stitching or other means.”

We appreciate the opportunity to file these comments with the Committee. We are prepared to address any questions you might have in order to achieve clarification on matters of tariff interpretation with which we are concerned. Please contact either Carolyn Beem, Manager of Public Affairs (cbeem@llbean.com) or Paul Linet, Manager of Customs & Trade (plinet@llbean.com) should you have any questions.

¹ It is our understanding that currently there are 12 bills related to the subject matter of these comments and that among these bills are HR 4994, HR 5330, HR 4995 (and companion Senate bills).