

September 19, 2018

The Honorable Robert Lighthizer  
United States Trade Representative  
600 17th Street NW  
Washington, DC 20508



**Re: USTR Docket 2018-0026: Section 301 Comments: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property and Innovation: Comments of the Juvenile Products Manufacturer's Association, Inc. Regarding Specific HTSUS Classifications Impacting Products for the Care and Protection of Babies**

Dear Ambassador Lighthizer,

The Juvenile Products Manufacturers Association (JPMA) appreciates this opportunity to share our gratitude related to the removal of many HTS codes from List 3, as announced on September 17, 2018. As we have previously shared in comments and hearing testimony, the imposition of additional ten (10%) to twenty-five percent (25%) tariffs on juvenile products will have a significant negative impact on the availability and cost of these products, which are necessary for the care and protection of U.S. infants and toddlers.

**Who We Are**

JPMA is a national not-for-profit trade organization representing 95% of the prenatal to preschool industry including the producers, importers, or distributors of a broad range of childcare articles that provide protection to infants and assistance to their caregivers. JPMA collaborates with government officials, consumer groups, and industry leaders on programs to educate consumers on the safe selection and use of juvenile products. 90% of our members are small businesses. Promoting Baby Safety is a key mission of the Association. We are the originator and Sponsor of Baby Safety Month, which occurs in the ninth month of each year.

JPMA submits that any tariff imposition that, either directly or indirectly, increases the ultimate price of products that provide for the care and safety of our most vulnerable populations must be avoided. Controlling costs to ensure the availability of safe, affordable juvenile products must remain a priority for all.

For the reasons set out in our previous comments, hearing testimony and herein, JPMA and our members have respectfully requested that "all childcare and protective child safety products" imported under the annexed scheduled HTS Subheadings in *Appendix A* not be subjected to the proposed additional tariffs. Again, we are grateful that many have been addressed and we are hopeful that the office of the USTR will use the same philosophy of protecting babies in the exclusion request submission review process and in future rounds of tariff considerations.

Please do not hesitate to contact the undersigned with any questions or concerns.

Very truly yours,

A handwritten signature in black ink that reads "Kelly Mariotti".

Kelly Mariotti, JD, CPA, CAE  
Executive Director, JPMA

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Appendix A: Juvenile Products Affected

HTSUS Code	Tariffs	Description	Product by Common Name
9403.90.60	Part 1	Parts of furniture (o/than seats or o/than of 9402), of textile material (o/than cotton)	Crib liner, headboard, play yard, car seats, bassinets
9403.50.90	Part 1	Furniture (o/than seats) of wood (o/than bentwood), of a kind used in the bedroom & not designed for motor vehicle use	Wooden cribs, toddler beds, bassinets/cradles, Upholstered headboard, baby monitor, toy organizer, bookcase, storage, bed rails, changing tables
3923.50.00	Part 1	Stoppers, lids, caps and other closures, of plastics	Plastic Sippy Cups
3923.30.00	Part 1	Carboys, bottles, flasks and similar articles for the conveyance or packing of goods, of plastics	Plastic Drinking Bottles, plastic water bottles, clips
9403.20.00	Part 1	Furniture (o/than seats) of metal nesoi, o/than of a kind used in offices	Metal toddler beds, bassinets, play yards, booster seats, bed frames, sleepers, walker, bed rails, crib mattress, rockers, cots, cribs
9404.29.90	Part 1	Mattresses (o/than of cellular rubber or plastics or of cotton)	Mattresses, hook on chairs, car booster seats, crib wedge, changing pad
3923.29.00	Part 1	Sacks and bags (including cones) for the conveyance or packing of goods, of plastics other than polymers of ethylene	Diaper Pail Refills, product packaging, diaper bags, lunch bags and totes, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags
4421.91.97	Part 1	Other articles, nesoi, of bamboo, incl pencil slats, burial caskets, gates for confining children or pets	Wooden safety gates, bamboo floor/shower mats
9403.89.60	Part 1	Furniture (o/than seats & o/than of 9402) of materials nesoi	Cribs, changing tables, toddler beds, bassinets/cradles, play yards, strollers, car seats, hampers, laundry totes, infant inclined sleep products
9401.90.50	Part 1	Parts of seats (o/than of 9402) nesoi, o/than of cane etc, rubber or plastics or of wood	Car seats, car seat covers, changing pad, walker covers, carseat canopy
3926.90.45	Part 1	Gaskets, washers and other seals of plastics	Parts of bassinet
4202.92.31	Part 1	Travel, sports and similar bags with outer surface of MMF textile materials	Carry bags, stroller and car seat travel bags, car seat accessories, diaper bags, lunch bags and totes, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, health kits, backpacks
4819.10.00	Part 1	Cartons, boxes and cases of corrugated paper or paperboard	Packaging, paper handtag; pdq; giftbox/sticker
7318.15.20	Part 1	Iron or steel, bolts and bolts & their nuts or washers, imported in the same shipment	Parts of bassinet, parts of stroller
7318.23.00	Part 1	Iron or steel, rivets	Parts of bassinet, parts of stroller
7323.99.90	Part 1	Iron (o/th cast)/steel (o/th tinplate or stainless), table, kitchen (o/th cooking,) or o/household arts & part, n/coated/plated w/prec.metal	Metal safety gates, component parts, fabric safety gates, stainless steel cups
9403.90.80	Part 1	Parts of furniture (o/than seats or o/than 9402) nesoi	Parts of crib, toddler bed, bassinet/cradle, car seat, mesh crib rails, bed rails
9401.90.35	Part 1	Parts of seats (o/than of 9402) nesoi, of rubber or plastics (o/than of heading 9402)	Stationary activity center toys, car seat components
9401.90.50	Part 1	Parts of seats (o/than of 9402) nesoi, o/than of cane etc, rubber or plastics or of wood	Seat pads
4819.20.00	Part 1	Folding cartons, boxes and cases of noncorrugated paper or paperboard	Empty printed packaging, paper handtag, pd1, giftbox/sticker
3923.21.00	Part 1	Sacks and bags (including cones) for the conveyance or packing of goods, of polymers of ethylene	Travel sick bags; sacks/bags plastic reclose, other; reusable snack bags, disposable bags, diaper pail refills
3926.20.90	Part 1	Articles of apparel & clothing accessories, of plastic, nesoi	Bibs
8302.41.90	Part 1	Base metal (o/than iron/steel/aluminum/zinc) mountings, fittings and similar arts, nesoi, suitable for buildings & base metal parts thereof	Door stops, parts of strollers
4202.92.08	Part 1	Insulated food or beverage bags with outer surface of textile materials, nesoi	Zipper bags, thermal bags, insulated bottle bags and stroller accessories with insulated features, diaper bags, lunch bags and totes, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags
5702.42.20	Part 1	Carpets and other textile floor coverings, of pile construction, woven, not tufted or flocked, made up, of man-made textile materials, nesoi	Rugs

9403.60.80	Part 1	Furniture (o/than seats & o/than of 9402) of wooden (o/than bentwood) nesoi	Chair, changing table, crib, easel, end/side table, fabric toy box, multi-bin wooden toy organizer, table & chair set, wooden toddler bed, wooden bookcase, wooden chair, wooden changing table, wooden coat rack, wooden desk, wooden storage, wooden toy box, nursery organizer
9403.90.70	Part 1	Parts of furniture (o/than seats or o/than of 9402), of wood	Bed rail, crib, daybed/toddler rail, guard rail, guardrail kit of wood
3923.90.00	Part 1	Articles nesoi, for the conveyance or packing of goods, of plastics	Product packaging, plastic hangers
4202.22.45	Part 1	Handbags with or without shoulder strap or without handle, with outer surface of cotton, not of pile or tufted construction or braid	Diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4420.90.80	Part 1	Wood marquetry and inlaid wood; wooden articles of furniture, nesoi	Other wood boxes, ornaments, shelves
4823.90.86	Part 1	Articles of paper pulp, paper, paperboard, cellulose wadding or webs of cellulose fibers, nesoi	Other other paper, paperboard, paper divider
5702.49.10	Part 1	made up, of cotton	Rugs
5705.00.20	Part 1	Carpets and other textile floor coverings, whether or not made up, nesoi	Rugs
5905.00.90	Part 1	Textile wall coverings, nesoi	Wall coverings
9403.89.30	Part 1	Furniture (o/than seats) of cane, osier, or similar materials o/than bamboo or rattan	Cribs, toddler beds, bassinets/cradles
9405.20.80	Part 1	Electric table, desk, bedside or floor-standing lamps, not of base metal	Lamps,
9405.40.84	Part 1	Electric lamps and lighting fixtures nesoi, not of base metal	Lighting fixtures, night lights
9405.91.30	Part 1	Parts of lamps, lighting fittings, illuminated signs & the like, globes and shades, of glass (o/than lead crystal)	Glass parts of lamps, lighting fixtures
9405.92.00	Part 1	Parts of lamps, lighting fixtures, illuminated signs & the like, of plastics	Plastic parts of lamps, lighting fixtures, lamp shades
3824.99.92	Part 1	Chemical products and preparations and residual products of the chemical or allied industries, nesoi	Resuable Ice Packs
4202.92.91	Part 1	Bags, cases and similar containers with outer surface of textile materials, of MMF except jewelry boxes	Organizing bags, travel car organizers, wet bags, diaper bag organizers, Diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags, carry bag
8302.50.00	Part 1	Base metal hat-racks, hat pegs, brackets and similar fixtures, and base metal parts thereof	Stroller hooks
9403.90.50	Part 1	Parts of furniture (o/than seats or o/than of 9402), of rubber or plastics (o/than reinforced or laminated plastics)	Play yards, car seats, plastic mat
9401.90.35	Part 1	Parts of seats (o/than of 9402) nesoi, of rubber or plastics (o/than of heading 9402)	Car seats, car booster seats, feeding booster seats
9403.90.40	Part 1	Parts of furniture (o/than seats or o/than of 9402), of reinforced or laminated plastics	Car seats, high chairs, bassinets, strollers
5407.52.20	Part 1	Woven fabrics, over 85 percent textured polyester filaments, dyed, nesoi	Single pad high chair, diaper bags
6006.31.00	Part 1	Unbleached or bleached knitted or crocheted fabrics of synthetic fibers, nesoi	Single pad high chair; diaper bags
7009.92.50	Part 1	Glass mirrors (o/than rearview mirrors), framed, over 929 cm2 in reflecting area	Mirrors
9401.61.60	Part 1	Seats (o/than chairs) nesoi, w/wooden frames, upholstered	Glider, ottoman, rocker, upholstered chair, upholstered glider, upholstered sofa
9404.21.00	Part 1	Mattresses, of cellular rubber or plastics, whether or not covered	Mattresses
4421.99.97	Part 1	Other articles, nesoi, of wood other than of bamboo, incl pencil slats, burial caskets, gates for confining children or pets	Wooden safety gates
9404.10.00	Part 1	Mattress supports	Mattress supports
7318.15.80	Part 1	Iron or steel, screws and bolts, nesoi, having shanks or threads 6 mm or more in diameter	Crib parts
9401.40.00	Part 1	Seats nesoi, convertible into beds (o/than garden seats or camping equip.)	Children's sofa, infant inclined sleep products, other furniture
9403.40.90	Part 1	Furniture (o/than seats) of wood (o/than bentwood) nesoi, of a kind used in the kitchen	High chairs
9404.29.10	Part 1	Mattresses, of cotton	Mattresses

4202.12.89	Part 1	Trunks, suitcases, vanity & attache cases, occupational luggage and similar containers, with outer surface of textile materials nesoi	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.32.40	Part 1	Articles of a kind normally carried in the pocket or handbag, with outer surface of cotton, not of pile or tufted construction	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.92.15	Part 1	construction	disposable bags, tote bags
4202.12.81	Part 1	Trunks, suitcases, vanity & attache cases, occupational luggage and similar containers, with outer surface of MMF materials	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.22.81	Part 1	Handbags with or without shoulder strap or without handle, with outer surface of MMF materials	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.12.29	Part 1	Occupational luggage and similar containers, with outer surface of plastics	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.22.15	Part 1	Handbags, with or without shoulder straps or without handle, with outer surface of sheeting of plastics	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.32.20	Part 1	Articles of a kind normally carried in the pocket or handbag, with outer surface of plastic sheeting, nesoi	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.92.10	Part 1	Insulated food or beverage bags with outer surface of sheeting of plastic	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.92.45	Part 1	Travel, sports and similar bags with outer surface of plastic sheeting	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.11.00	Part 1	Trunks, suitcases, vanity & all other cases, occupational luggage & like containers, surface of leather, composition or patent leather	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4202.21.60	Part 1	Handbags, with or without shoulder strap or without handle, with outer surface of leather, composition or patent leather, nesoi, n/o \$20 ea.	Backpacks, diaper bags, handbags, coolers, pencil cases, attache, phone cases, pouches, diaper disposable bags, tote bags
4819.50.40	Part 1	Packing containers, nesoi, of paper, paperboard, cellulose wadding or webs of cellulose fibers	Paper handtag; pdq; giftbox/sticker, packaging
7326.20.00	Part 1	Iron or steel, articles of wire, nesoi	Metal hangers
6505.00.15	Part 1	Hats and headgear, of cotton and/or flax, knitted	Hats
6505.00.60	Part 1	Hats and headgear, of man-made fibers, knitted or crocheted or made up from knitted or crocheted fabrics, not in part of braid	Hats
6505.00.80	Part 1	Hats and headgear, of man-made fibers, made up from felt or of textile material, not knitted or crocheted, not in part of braid	Hats
7114.11.70	Part 1	Silversmiths' wares (other than for household/table/kitchen use & toilet and sanitary wares) of silver, nesoi	Silver plated photo album, photo frame, curl holder, piggy bank
7114.20.00	Part 1	Goldsmiths' or silversmiths' wares of base metal clad with precious metal	Silver plated photo album, photo frame, curl holder, piggy bank
7114.11.40	Part 1	Spoons and ladles (o/than w/sterling silver handles) of silver, whether or not plated or clad w/other precious metal	Sliver plated spoon
5703.30.20	Part 1	Hand-hooked carpets & other textile floor coverings, tufted, whether or not made up, of man-made materials (not nylon/other polyamides)	Decorative rug
5603.92.00	Part 1	Nonwovens (not of man-made filaments), weighing >25 but not >70 g/square m, whether or not impregnated, coated, covered or laminated	Disposable changing pads
8205.51.30	Part 1	Iron or steel household handtools (o/than carving & butcher steels), and base metal parts thereof	Part of safety gates
8210.00.00	Part 1	Hand-operated mechanical appliances weighing 10 kg or less, used in preparation, conditioning, serving food or drink & base metal pts	Part of safety gates, baby food steamer
3925.90.00	Part 1	Builders' ware of plastics, nesoi	Part of safety gates, switch plate
2804.61.00	Part 1	Silicon containing by weight not less than 99.99 percent of silicon	Part of safety gates
4202.22.40	Part 1	Handbags with or without shoulder strap or without handle, with outer surface of textile materials, wholly or in part of braid, nesoi	Carry bag

9401.20.00	Part 1	Seats, of a kind used for motor vehicles	Car seats, booster seats (car)
9403.90.10	Part 1	Parts of furniture (o/than seats), for furniture of a kind used for motor vehicles	Car seats, booster seats (car)
9403.60.40	Part 1	Furniture (o/than seats & o/than of 9402) of bentwood nesoi	Waste baskets
9403.82.00	Part 1	Bamboo furniture and parts	Bamboo hamper, bamboo furniture
9401.52.00	Part 1	Bamboo seats	Bamboo bench and seats
4602.19.35	Part 1	Articles of wickerwork, nesoi, of willow or wood	Willow basket and hampers
4602.90.00	Part 1	Basketwork, wickerwork and other articles made directly from plaiting materials or from articles of heading 4601, nesoi; loofah articles	Woven polyester, paper baskets
8525.80.30	Part 1	Television cameras, nesoi	Wifi baby monitors
8708.99.81	Part 1	Pts. & access., nesoi, of motor vehicles of 8701, nesoi, and 8702-8705	Car window shades, baby car mirror
8708.29.50	Part 1	Pts. & access. of bodies for mtr. vehicles of headings 8701 to 8705, nesoi	Car seat components
8302.30.30	Part 1	Iron or steel, aluminum or zinc mountings, fittings and similar articles nesoi, suitable for motor vehicles, and base metal parts thereof	Car seat components
3922.90.00	Part 1	Bidets, lavatory pans, flushing cisterns and similar sanitary ware nesoi, of plastics	Potty seat
4821.10.20	Part 1	Paper and paperboard labels, printed in whole or part by a lithographic process	Packaging and labels
5806.32.10	Part 1	Woven ribbons of man-made fibers, not pile, not cont by wt 5% or more of elastomeric yarn or rubber	Packaging
6505.00.20	Part 1	Headwear, of cotton, not knitted; certified hand-loomed and folklore hats & headgear, of cotton or flax, not knitted	Baby cap
6805.30.50	Part 1	Natural or artificial abrasive powder or grain on a base of materials nesoi, in forms nesoi	Emery boards
3307.90.00	Part 1	Depilatories and other perfumery, cosmetic or toilet preparations. nesoi	Nursery freshener
8308.90.90	Part 1	Base metal clasps, frames with clasps not incorporating a lock, and like articles, and base metal parts thereof	Stroller clips
9405.50.40	Part 1	Non-electrical lamps and lighting fixtures nesoi, not of brass	Night light
3402.20.51	Part 1	Surface-active, washing, and cleaning preparations nesoi, put up for retail sale, not of heading 3401	Cleaning spray
7009.10.00	Part 1	Glass rearview mirrors for vehicles	Car backseat mirror
4202.92.97	Part 1	Bags, cases & similar containers with outer surface of sheeting of plastic materials,not containers for CDs or cassettes, or CD or cassette players	Car seat tote
8716.80.50	Part 1	Vehicles, not mechanically propelled, nesoi	Car seat transporter
9401.69.40	Part 1	Chairs nesoi, w/teak frames, not upholstered	Wooden glider
8302.20.00	Part 1	Base metal castors and base metal parts thereof	Parts of cribs
8506.10.00	Part 1	Manganese dioxide primary cells and primary batteries	Potty seat batteries
5209.29.00	Part 1	Bleached woven fabrics of cotton, nesoi, containing 85% or more cotton by weight, weighing more than 200g/m2	Crib mattress related materials
9606.22.00	Part 1	Buttons, of base metal, not covered with textile material	High chair parts
2902.50.00	Part 1	Styrene	Stroller parts
5603.91.00	Part 1	Nonwovens (not of man-made filaments), weighing not >25 g/square m, whether or not impregnated, coated, covered or laminated	Disposable washcloths
6506.91.00	Part 1	Headgear (other than safety headgear), nesoi, of rubber or plastics, whether or not lined or trimmed	Sun visor
5608.19.20	Part 1	Knotted netting of twine, cordage or rope (excluding fish netting or made-up fishing nets) of man-made textile materials	Teething feeder replacement bags
9403.70.40	Part 2	Furniture (o/than seats & o/than of 9402) of reinforced or laminated plastics nesoi	Plastic toddler beds, bassinets, booster seats, play yards, footboard, plastic storage bins, plastic toy box

9401.80.60	Part 2	Seats nesoi, o/than of wood, or w/metal frame or of rubber or plastics (o/than of heading 9402)	Car seats, booster seats (car), car seat parts, jumpers, stationary activity centers, bouncers, strollers, plush chair, travel systems, feeding booster seats, car seat protector
9401.71.00	Part 2	Seats nesoi, w/metal frame (o/than of heading 9402), upholstered	High chairs, hook on chairs, feeding booster seats, bouncer seats, swings, car seats, rocker, walkers with metal frame
9401.80.40	Part 2	Seats nesoi, of rubber or plastics (o/than of reinforced or laminated plastics & o/than of heading 9402)	High chairs, car booster seats, feeding booster seats, bath seats, walkers, bouncers, swings, stationary activity centers, car seats, strollers, rockers
9401.79.00	Part 2	Seats nesoi, w/metal frame (o/than of heading 9402), not upholstered	High chairs, metal chairs/storage boxes, metal table and chairs set, play yards, walkers, rockers, portable tent set, bouncers
9403.70.80	Part 2	Furniture (o/than seats & o/than of 9402) of plastics (o/than reinforced or laminated) nesoi	Step stools, bassinets, booster seats
9401.61.40	Part 2	Chairs nesoi, w/wooden frames (o/than teak), upholstered	Glider, ottoman, rocker, upholstered chair, upholstered glider, upholstered sofa w/stg, wooden upholstered bed, high chair
9401.69.60	Part 2	Chairs nesoi, w/wooden frames (o/than teak), not upholstered	Glider, ottoman, rocker, booster seat, high chair
9401.80.20	Part 2	Seats nesoi, of reinforced or laminated plastics (o/than of heading 9402)	High chairs, potty seats