

November 1, 2016

Ambassador Michael Froman
U.S. Trade Representative
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Docket Number: USTR-2015-0013

Dear Mr. Ambassador:

The undersigned organizations are writing to request that **all** statutorily eligible travel goods – items like luggage, backpacks, purses, and wallets – be added to the list of products eligible to be imported duty-free from **all** Generalized System of Preferences (GSP) beneficiary countries.

Our members make, market, distribute, and sell travel goods throughout the United States, and around the world.

While we are pleased that least-developed GSP beneficiary countries, along with beneficiaries of the African Growth and Opportunity Act (AGOA), are now accorded duty-free access for eligible travel-good items, we strongly urge the Administration to immediately designate the remaining GSP beneficiary countries as eligible to export all statutorily eligible travel goods into the U.S. market under the GSP.

As was conclusively demonstrated during the October 18, 2016, hearing and by supplementary and earlier information submitted on the public record, such a designation satisfies each of the four GSP statutory criteria in Section 2461: (a) further economic development in developing countries through export expansion, (b) facilitate currently unrealized competitiveness of developing countries, (c) align the U.S. GSP program with those of other major developed countries, and (d) avoid economic harm to U.S. manufacturing interests. Indeed, designating the remaining GSP countries would support the previous, limited-eligibility designation by creating a more competitive travel goods industry that recognizes the realities and requirements of its global supply chain. Full beneficiary designation will also accord to GSP beneficiary countries and to U.S. companies with the prerequisite tools to accomplish diversifying travel-goods sourcing beyond its current dominance by a single country.

In addition to securing the development benefits, swift designation of the remaining GSP countries is important to eliminate residual confusion that occurred as a result of the partial beneficiary designation in July. Full designation is entirely consistent with Congressional intent. The legislative history of the enacting statute – the Trade Preferences Extension Act – shows that Congress envisioned no limitations on the GSP beneficiary countries to be designated under this authority. This perspective has been

reinforced through a series of letters sent to you by House and Senate members since July.

It is our hope that we can quickly and jointly move past the current process so that all GSP beneficiary developing countries (including AGOA beneficiaries and LDCs currently designated), our members, and the consumers and workers they serve can soon take full advantage of the opportunities that GSP-duty free access for travel goods will provide.

Sincerely,

American Apparel & Footwear Association (AAFA)
Express Association of America (EAA)
Fashion Accessories Shippers Association (FASA)
Gemini Shippers Association
National Retail Federation (NRF)
Outdoor Industry Association (OIA)
Promotional Products Association International (PPAI)
Retail Industry Leaders Association (RILA)
Sports & Fitness Industry Association (SFIA)
Toy Industry Association (TIA)
Travel Goods Association (TGA)
U.S. Chamber of Commerce