

# we wear<sup>®</sup> jobs

July 24, 2015

The Honorable Orrin Hatch Chairman Senate Finance Committee U.S. Senate Washington, DC 20510

The Honorable Paul Ryan Chairman House Ways and Means Committee U.S. House of Representatives Washington, DC 20515 The Honorable Ron Wyden Ranking Member Senate Finance Committee U.S. Senate Washington, DC 20510

The Honorable Sandy Levin Ranking Member House Ways and Means Committee U.S. House of Representatives Washington, DC 20515

Dear Chairmen Hatch and Ryan and Ranking Members Wyden and Levin:

As you work to conclude the conference for the *Trade Facilitation and Trade Enforcement Act* (H.R. 644), we are writing to express support for the inclusion of several key provisions, all of which are important for the U.S. apparel and footwear industry, and the four million U.S. workers our industry employs.

## Miscellaneous Tariff Bill (MTB) process

The Senate version of the legislation contains a provision that would restart the MTB process, which has been suspended since 2012. This is vitally important as MTB enables temporary duty reductions for goods not produced in the United States. The MTB process is vital in ensuring that companies are able to petition in a timely and transparent manner for the removal of those duties, saving millions of dollars.

## **Outerwear Fixes**

The *Trade Preferences Extension Act of 2015* (PL 114-27) contains important provisions to separate outerwear classifications in the Harmonized Tariff System (HTS). Because of drafting errors, several of those provisions need to be corrected before they can take effect. Once enacted, these fixes and the underlying provisions will provide much-needed clarity for trade in outdoor products.

#### Manufacturer's ID (MID)

Both the House and the Senate versions contain a provision that delinks the documentation requirements of articles sent abroad (to be reimported) that

1601 North Kent Street Suite 1200 Arlington, VA 22209

(703) 524-1864 (800) 520-2262 (703) 522-6741 fax www.wewear.org have not been advanced in value or improved in condition from the original import entries (9801.00.10). However, that provision leaves intact a requirement that the re-importation identify the original manufacturer in cases of textiles and apparel. This MID requirement should also be removed if the underlying provision is to function as intended for our industry.

#### 9802 Comingling

Both versions make important fixes to the 9802.00.40/50 provisions to permit comingling of imported goods that are exported, repackaged, and reimported. But we are concerned that the language does not adequately clarify that comingling is also permitted when the comingled items include articles that were subject to minor alterations abroad. We urge you to clarify this provision.

Should you require additional information, please contact Steve Lamar at <u>slamar@wewear.org</u> or (703)797-9041.

Thank you again for your attention to these important requests.

Please accept my best regards,

Juanita D. Duggan

Juanita D. Duggan President and CEO