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August 6th, 2018

**Attn: Ambassador Lighthizer**  
Office of United States Trade Representative  
600 17th Street, N.W.  
Washington , DC 20508

**Re: Proposal to increase the duty on goods from China by 10-25 percent, including bicycle products and accessories**

Dear Ambassador Lighthizer:

The North American Bikeshare Association (NABSA) connects the biggest minds in bikeshare to support, promote and enhance bikeshare across North America. NABSA is the bikeshare industry's membership organization with representation from system owners, operators, host cities, equipment manufacturers and technology providers.

China is a pivotal source of bicycles, parts, and accessories. In 2017, approximately 15.4 million bicycles were imported into the United States under Harmonized Tariff Schedule (HTS) heading 8712. Of these bicycles, 14.4 million came from China. Of the HTS headings in the proposal that specifically relate to bicycles, almost 50 percent of current import units and 60 percent of import dollars come from China. These figures do not include the dozens of HTS codes related to accessories, metals and soft goods that do not specifically relate to bicycles but include significant portions of our products.

Since 2010, 123 million trips have been taken on bikeshare bikes in the US. In the past two years, bikeshare ridership has increased by over 20% each year. People use bikeshare to get to work, buy groceries and access the necessities of life in over 200 cities across the nation.

The bikeshare industry relies on several products and accessories listed in this proposal to grow the industry and maintain shared-use bicycles in safe and working order. The proposed tariff on



bicycle products and accessories would significantly increase the cost to implement and operate bikeshare for cities, companies, and non-profits, as well as for the users who depend on it, undoubtedly harming the bikeshare industry.

I urge you to eliminate bicycles and related products from the scope of this proposal, most importantly Harmonized Tariff Schedule headings: 8712 (complete bicycles); 8714 (bicycle parts); 4011.50.00 (bicycle tires); 4013.20.00 (bicycle inner tubes); 3926.90.96 (bicycle inner tubes); 6506.10.30.45/6506.10.60.45 (helmets); 7315.11.00.10 (chains); 8512.10.20/8512.10.40/8512.90.40 (bicycle lights); 8716.40.00 (trailers); 4204 (racks and bags). We request that the committee examine the full list of HTS codes that will affect bicycle products.

If implemented, these proposed tariffs will have a significant impact on the bikeshare industry, its employees, and its customers. We encourage you to modify this proposal.

Thank you.

Samantha Herr  
Executive Director, North American Bikeshare Association



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