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); 6506.10.45/6506.10.60.45 (helmets); 7315.11.10 (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
Board of Directors

Dianna Ward, President
Charlotte BCycle

Kristen Camarena, Vice President
Fort Worth Bike Sharing

Kim Lucas, Secretary
District Department of Transportation

Adrian Popovici, Treasurer
PBSC Urban Solutions

Sean Wiedel, Immediate Past President
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Mitch Vars
Nice Ride Minnesota

Steve Hoyt-McBeth
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CoMoUK (formerly Bikeplus)
Cyclehop
District of Columbia Department of Transportation
DecoBike Miami LLC
Detroit Bike Share
Dropbike, Inc.
Explore Bike Share - Memphis
Fort Worth Bike Sharing
Gates Carbon Drive
GenZe
Gonbike
Gotcha Bike
Graffiti Removal Services
GREENbikes SLC
Houston B-cycle
Indianapolis Cultural Trail/PACERS
JUMP
Kansas City BCycle
King-Meter Technology
Los Angeles County Metropolitan Transportation Authority
Louisville Metro
Midwest Bikeshare/Bublr
Mobike
Motivate
nextbike, inc.
Nice Ride Minnesota
Noa Technologies
P3 Global Management
Pace/Zagster
PATH Hawaii
PBSC Urban Solutions
Pittsburgh Bike Share
Portland Bureau of Transportation
Quality Bicycle Parts
Quict
RE-Sure Inc.
Ride On Miami LLC
Sacramento Area Council of Governments
San Antonio Bike Share
San Francisco Municipal Transportation Agency
Seattle Department of Transportation
Serco Inc.
Shift Transit
Spin
Tembici
Toronto Parking Authority/Bike Share
Toronto Transit
Ubike Technologies North America Inc
Urban Sharing AS
Urbike
VBike (Mexico)
VeoRide
We-cycle
Zyp Bikeshare