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nabsa.net

July 23rd, 2018

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

Re: Proposed 25 Percent Tariff on the Import of Electric Bicycles and Motors from China

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 providers and technology providers.

A proposed 25 percent tariff on the import of electric bicycles and motors from China that is being considered as part of the ongoing Section 301 investigation could increase the cost of e-bikeshare equipment drastically, and hinder the accessibility of bikeshare for all. NABSA urges you to modify this proposal.

Electric bicycles look and ride like human-powered bicycles, but include a small electric motor to assist the rider. This electric assist option is increasing the number of Americans who commute by bicycle as it reduces barriers related to trip distance and terrain. Electric bicycles also allow people with physical limitations, older adults and people who live in hilly communities to participate in bicycling.

The proposed tariffs on electric bicycles imported from China under tariff codes 8711.90.01 and 8711.60.00, as well as their motors imported under tariff code 8501.31.40, are misguided. Specifically, while tariffs are intended to protect domestic manufacturing, very few electric bicycles are currently manufactured in the United States. We do not anticipate that to change in the foreseeable future.



Electric bicycle innovation is a fast-growing trend and a cornerstone of the bikeshare future. Already in 2018, we have over 4,000 e-bikeshare bikes in US fleets, another 400 across North America, and counting. A price increase would make electric bikeshare equipment significantly more expensive, hindering the industry's growing e-bike trend, and the accessibility of bikeshare for all.

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. Bikeshare e-bikes are poised to dramatically increase much-needed access to public transportation where none has existed before. We believe it would be hard for bikeshare vendors-- for-profit and non-profit alike-- to absorb a 25 percent tariff to offer a low-cost public transportation option to citizens.

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.

A handwritten signature in black ink, appearing to read 'S. Herr', is centered on a light yellow rectangular background.

Samantha Herr
Executive Director, North American Bikeshare Association



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