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May 10, 2013

Via www.regulations.gov
Docket number USTR–2013–0019

Douglas Bell
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

Attn: David Weiner, Deputy Assistant USTR for Europe

Re: Transatlantic Trade and Investment Partnership Agreement (TTIP); Comments of The Timken Company

Products: Ball and Roller Bearings and Parts Thereof of Heading 8482, HTS and Spherical Plain Bearing of Subheading 8483.30.80, HTS

Dear Mr. Bell:

On behalf of The Timken Company ("Timken"), we hereby submit comments concerning the proposed Transatlantic Trade and Investment Partnership Agreement (TTIP) in response to your request for such comments. *See Request for Comments Concerning Proposed Transatlantic Trade and Investment Agreement*, 78 Fed. Reg. 19566 (April 1, 2013) (request for public comments and notice of public hearing).

Timken's position is that the U.S. Trade Representative should pursue the following objectives in the TTIP negotiations:

Market Access: The United States should seek the longest tariff phase-out period considered for ball and roller bearing products classified in heading 8482, HTS, in particular ball bearings, tapered roller bearings, spherical roller bearings, and

cylindrical roller bearings, and parts thereof, and spherical plain bearings, classified in subheading 8483.30.80, HTS.

Rules of Origin: The United States should seek to establish preferential rules of origin that are transparent and administrable. With respect to ball and roller bearing products classified in heading 8482, HTS, and spherical plain bearings, classified in subheading 8483.30.80, HTS, eligibility for preferential tariff treatment should be limited to products that undergo a tariff shift change at the 4-digit heading level or by an addition of appropriate regional value content. Timken supports rules of origin based on clear tariff shifting and regional content rules, such as those established in NAFTA and recent FTAs, which are intended to ensure that goods meet the tariff heading changes and regional content requirements before they receive preferential treatment.

Trade Remedies: The United States should preserve the right to use trade remedies and seek to strengthen the effectiveness of trade remedy laws (*i.e.*, antidumping duty, countervailing duty, and safeguard laws). The United States should oppose any TTIP proposals that seek to weaken or diminish trade remedies.

I. The Timken Company

The Timken Company is a U.S. company that produces various antifriction bearings and steel. It produces a broad range of antifriction bearings, including tapered roller bearings, ball bearings, cylindrical roller bearings, and spherical roller bearings and spherical plain bearings and various steel mill products (including bearing quality steel, alloy steel and steel tubing). It had worldwide sales of nearly $5 billion in 2012. Timken is based in Canton, Ohio. It manufactures and sells around the world.

The Timken Company is recognized worldwide as an efficient producer of high quality bearings and steel. Its products can compete with those of any other manufacturer so long as the competition is on a level playing field. Subsidies and protected markets provided by foreign

governments reduce Timken's ability to compete. The company supports both a liberalized world-wide trade environment and strong domestic trade laws that provide it and other domestic producers with tools to respond to foreign unfair trade practices. Timken's primary production and sales market is the United States. Because the U.S. has the freest market in the world for both bearings and steel, Timken is particularly vulnerable to imports traded below their normal value or subsidized. Any negotiations undertaken by the U.S. should include as a primary objective the preservation and strengthening of the trade remedy provisions that the U.S. has bargained for in the Uruguay Round of trade negotiations and prior rounds.

With respect to market access issues in the TTIP negotiations, Timken has an interest in the following products.

Timken Bearing Products	2013 MFN Rate for U.S. Imports	HTSUS (2013)
Ball bearings, including BB wheel hub units	2.4% 9%	8482.10.10 8482.10.50
Tapered roller bearings, including TRB wheel hub units	5.8%	8482.20.00
Spherical roller bearings	5.8%	8482.30.00
Other cylindrical roller bearings	5.8%	8482.50.00
Other, including combined ball/roller bearings	5.8%	8482.80.00
Parts of bearings	4.4% 5.8% -- 9.9%	8482.91 8482.99
Spherical Plain Bearings	4.5%	8483.30.80

II. TTIP Should Recognize Bearings as Import Sensitive

A. Imports Account for a Substantial Share of Apparent Domestic Consumption

Imported bearings from all sources have a substantial share of apparent domestic consumption. Imports of complete ball bearings in 2010 accounted for approximately 35 percent

of the consumption, while imports of complete roller bearings generally account for approximately 30 percent (2008 data only). Imports of parts and components of ball bearings, however, accounted for approximately 80 percent of the market in 2010.

		Value in USD				
NAICS and Description	**Year**	**Domestic Export**	**Import for Consumption**	**Domestic Shipments**	**Apparent Consumption**	**Import % of consumption**
3329911 - Ball bearings, complete, unmounted	**2010**	481,201,707	776,496,315	1,913,200,000	2,208,494,608	35.16%
	2009	418,887,991	568,890,199	1,678,900,000	1,828,902,208	31.11%
	2008	528,846,166	818,437,302	2,014,300,000	2,303,891,136	35.52%
	2007	524,080,059	791,108,373	2,058,900,000	2,325,928,314	34.01%
	2006	445,319,747	787,121,673	1,932,800,000	2,274,601,926	34.60%
3329913 - Tapered roller bearings, including cups and cones, unmounted	**2010**	490,455,762	435,790,425	2,486,300,000	2,431,634,663	17.92%
	2009	354,163,586	272,189,671	2,178,000,000	2,096,026,085	12.99%
	2008	559,676,234	483,878,580			
	2007	434,969,825	372,442,042			
	2006	438,282,086	431,659,630	1,958,300,000	1,951,677,544	22.12%
3329915 - Roller bearings (except tapered), unmounted	**2010**	281,622,368	502,226,157			
	2009	234,763,707	387,384,515			
	2008	291,892,756	460,022,601	1,330,900,000	1,499,029,845	30.69%
	2007	271,817,023	405,306,199	1,324,200,000	1,457,689,176	27.80%
	2006	238,538,038	334,912,153	1,139,000,000	1,235,374,115	27.11%
3329917 - Mounted bearings (except plain)	**2010**	68,597,874	56,490,015	450,800,000	438,692,141	12.88%
	2009	43,812,804	45,423,943	450,700,000	452,311,139	10.04%
	2008	58,230,605	65,035,507	493,800,000	500,604,902	12.99%
	2007	66,970,824	58,567,671	500,300,000	491,896,847	11.91%
	2006	78,655,393	52,705,361	554,500,000	528,549,968	9.97%
3329919 - Parts and components for ball and roller bearings (except cups and cones), including balls and rollers, sold separately	**2010**	335,155,743	411,527,413	442,200,000	518,571,670	79.36%
	2009	219,673,566	264,306,862	363,200,000	407,833,296	64.81%
	2008	332,646,154	449,891,173	796,300,000	913,545,019	49.25%
	2007	304,838,870	367,725,367	715,500,000	778,386,497	47.24%
	2006	295,131,973	366,070,338	652,400,000	723,338,365	50.61%

Sources: MA332Q - Current Industrial Report on Antifriction Bearings, USITC Trade Dataweb

B. The EU is a Major Source of Imported Bearings and its Bearing Producers Are Among the Largest in the World

The EU is a major source of bearings imported into the United States, all of which are currently subject to the U.S. MFN duty rates. Imports from the EU increased 35 percent from 2007 to 2012, even in spite of the significant decline in imports in 2009 due to the worldwide recession. In 2012, imports from the EU increased by seven percent from 2011 and represented almost one-third of total imports of ball or roller bearings of heading 8482. Imports from the EU have consistently made up about one-third of U.S. imports.

HTS - 8482: BALL OR ROLLER BEARINGS, AND PARTS THEREOF
Customs Value for USITC Country Group: EU27
U.S. Imports for Consumption -- Annual Data
(*In 1,000 Dollars*)

Country	**2007**	**2008**	**2009**	**2010**	**2011**	**2012**	% Change 2011-2012
EU27	614,882	695,200	492,629	615,151	774,430	828,946	7.00%
TOTAL for all countries	**1,932,010**	**2,204,343**	**1,465,889**	**2,093,129**	**2,723,761**	**2,936,666**	**7.80%**
% EU of Total	31.80%	31.50%	33.60%	29.40%	28.40%	28.20%	
Sources: USITC DataWeb, compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.							

Of the 27 countries that are members of the European Union, in 2012 ten EU countries were among the top sixteen sources of U.S. imports of ball or roller bearings of heading 8482, HTS ("Ball or roller bearings and parts thereof").

HTS - 8482: BALL OR ROLLER BEARINGS, AND PARTS THEREOF
Customs Value for ALL Countries
U.S. Imports for Consumption -- Annual Data
(*In 1,000 Dollars*)

	Country	2007	2008	2009	2010	2011	2012	% Change 2011 - 2012
1	Japan	564,173	627,983	375,060	578,097	773,697	882,311	14.00%
2	China	258,866	324,162	204,422	348,554	494,435	498,684	0.90%
3	**Germany**	241,536	270,622	196,175	238,731	280,078	295,997	5.70%
4	Canada	218,767	223,769	172,462	219,114	248,732	257,090	3.40%
5	Mexico	55,683	64,303	62,069	97,272	126,969	136,888	7.80%
6	**Romania**	43,462	47,264	38,025	62,426	98,761	116,364	17.80%
7	India	54,731	94,331	48,978	74,134	101,831	114,021	12.00%
8	**France**	68,630	83,212	61,729	68,675	81,879	85,084	3.90%
9	Korea	34,521	35,424	32,827	53,700	72,311	85,043	17.60%
10	**Sweden**	39,414	46,707	30,576	36,122	43,632	51,830	18.80%
11	**Italy**	51,579	59,600	42,255	41,259	48,657	50,416	3.60%
12	**Austria**	29,195	33,185	22,537	32,190	44,977	46,857	4.20%
13	**United Kingdom**	38,971	43,911	31,856	35,918	44,886	46,683	4.00%
14	**Slovak Republic**	42,829	40,384	20,122	27,397	43,631	43,686	0.10%
15	**Spain**	12,752	13,234	17,295	27,890	33,066	36,437	10.20%
16	**Poland**	29,980	38,654	16,716	27,233	34,875	33,988	-2.50%
17	Taiwan	24,342	23,278	13,061	16,905	22,417	26,636	18.80%
18	Thailand	20,078	19,394	11,354	15,839	16,439	17,495	6.40%
19	Brazil	34,104	35,800	14,863	16,359	15,540	14,700	-5.40%
20	Malaysia	4,021	9,912	5,998	7,648	11,363	13,003	14.40%
	TOTAL for All Countries	**1,932,010**	**2,204,343**	**1,465,889**	**2,093,129**	**2,723,761**	**2,936,666**	**7.80%**

Sources: USITC DataWeb, compiled from tariff and trade data from the U.S. Department of Commerce and the U.S. International Trade Commission.

In addition, the United States International Trade Commission, upon examining exports from France, Germany, Italy, and the United Kingdom, concluded that "producers in France, Germany, Italy and the United Kingdom are highly export oriented, ranking among the largest

[ball bearing] exporters in the world."[1] The Commission also concluded that these producers had "demonstrated the ability to shift exports relatively quickly from one market to another on an annual basis during the period examined in these reviews."[2]

C. The U.S. Government Has Repeatedly Recognized the Bearing Industry As Import Sensitive.

The United States has long recognized that the bearing industry is both vital to national security and import-sensitive. An antidumping order on Tapered Roller Bearings from China has been in place since 1987.[3] In addition, from 1989 until 2012, antidumping duty orders on bearings were in effect for four EU countries (United Kingdom, Germany, France, and Italy), as well as Japan and Singapore. The world's major bearing producers (including those in the EU) continued to sell at less than fair value, as shown by the results of administrative reviews of the orders conducted by the Department of Commerce.[4]

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1 *Certain Bearings From China, France, Germany, Italy, Japan, Singapore, and the United Kingdom*, Investigation Nos. 731-TA-344, 391-A, 392-A and C, 393-A, 394-A, 396, and 399-A (Second Review), USITC Pub. 3876 (August 2006) ("Certain Bearings II"), Views of the Commission at 43.

2 *Certain Bearings II*, Views of the Commission at 43.

3 *Tapered Roller Bearings and Parts Thereof, and Certain Housings Incorporating Tapered Rollers From Hungarv, The People's Republic of China, and Romania*, Investigation Nos. 731-TA-341, 344, 345 (Final), USITC Pub.1983 (June 1987).

4 For ball bearings: *see, e.g. Ball Bearings and Parts Thereof From France, Germany, and Italy: Final Results of Antidumping Administrative and Changed Circumstances Reviews*, 76 Fed. Reg. 52937, 52938-39 (Dep't Commerce Aug. 24, 2011) (2009-10 period); *Ball Bearings and Parts Thereof From France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews, Final Results of Changed-Circumstances Review, and Revocation of an Order in Part*, 75 Fed. Reg. 53661, 53662-63 (Dep't Commerce Sept. 1, 2010) (2008-09 period); *Ball Bearings and Parts Thereof From France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews and Revocation of an Order in Part*, 74 Fed. Reg. 44819, 44821 (Dep't Commerce Aug. 31, 2009) (2007-08 period); *Ball Bearings and Parts Thereof From France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews and Rescission of Reviews in Part*, 73 Fed. Reg. 52823, 52825 (Dep't Commerce Sept. 11, 2008) (2006-07 period); *Ball Bearings and Parts Thereof from France, Germany, Italy, Japan, Singapore, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews and Rescission of Review in Part*, 72 Fed. Reg. 58053, 58054 (Dep't Commerce Oct. 12, 2007) (2005-06 period); *Ball Bearings and Parts Thereof from France, Germany, Italy, Japan, and the United Kingdom: Final Results of Antidumping Duty Administrative Reviews*, 71 Fed. Reg. 40064, 40066 (Dep't Commerce July 14,

In the context of the first five-year "sunset" review of the antidumping orders on antifriction bearings, the International Trade Commission observed with respect to ball bearings that even "a relatively small increase in the volume of cumulated subject ball bearing imports would be significant."[5] The Commission reached this conclusion because: (1) the ball bearing industry is a mature capital intensive industry; (2) the industry is characterized by high fixed costs; (3) the domestic ball bearings industry is composed of a large number of smaller producers; (4) the price elasticity of demand for ball bearings is relatively low; (5) ball bearings are highly substitutable; and (6) the market for bearings is characterized by a fair degree of price competition.[6]

Because bearings are highly substitutable, purchasers do not hesitate to purchase lower-priced bearings. Further, producers in the European Union are among the largest bearing producers in the world. These characteristics make the U.S. bearings industry particularly susceptible to low-priced imports from the EU. While U.S. demand for bearings is affected by the economy, it is not affected by prices. Thus, when lower-priced imports are sold in the U.S., they necessarily displace other bearings. Because it is a mature industry and capital-intensive, a producer needs to have significant volume in order to use plant resources to obtain a reasonable

2006) (2004-05 period); *Ball Bearings and Parts Thereof from France, Germany, Italy, Singapore, and the United Kingdom*, 70 Fed. Reg. 54711, 54713 (Dept. Commerce Sept. 16, 2005) (2003-04 period). For tapered roller bearings: *Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People's Republic of China: Final Results of Antidumping Duty Administrative Review; 2010–2011*, 78 Fed. Reg. 3396, 3397 (Dep't Commerce Jan. 16, 2013); *Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People's Republic of China: Amended Final Results of the Administrative Review of the Antidumping Duty Orde*r, 77 Fed. Reg. 24179 (Dep't Commerce April 23, 2012); *Tapered Roller Bearings and Parts Thereof, Finished and Unfinished, From the People's Republic of China: Final Results of the 2008–2009 Antidumping Duty Administrative Review*, 76 Fed. Reg. 3086, 3088 (Dep't Commerce Jan. 19, 2011).

5 *Certain Bearings From China, France, Germany, Hungary, Italy, Japan, Romania, Singapore, Sweden, and the United Kingdom*, Investigation Nos. AA-1921-143, 731-TA-341, 731-TA-343-345, 731-TA-391-397, and 731-TA-399 (Review), USITC Pub. 3309 (June 2000), Vol. 1 at 39-40 ("*Certain Bearings*").

6 *Certain Bearings*, Vol. 1 at 37-40.

return. Low-priced imports not only act to reduce overall prices, they also reduce volume, so that the domestic producer who has lost sales finds it harder to recover its costs. Thus, low-priced imports inhibit earnings.

In 1988, a study by the U.S. Department of Commerce on the effect of imports of bearings on the national security recognized the negative impact GSP eligibility could have on the domestic industry. Based on the rapid increases in imports and on the industry's sensitivity to imports Commerce concluded that "any move to reinstate GSP eligibility on antifriction bearings could have a negative effect on certain segments of the U.S. industry." Indeed, the U.S. Congress' concern with the importance of the bearings industry to national security was so high that it included bearings in the Defense Federal Acquisition Regulations. The first category of bearings that the Defense Department included in the DFAR was miniature bearings, in 1971. Congress later added all bearing sizes.

D. The Import-Sensitive Nature of the Bearings Industry is Reflected in a Loss of Employment.

The domestic bearing industry has experienced employment losses. For the industry as a whole (categorized as "ball and roller bearing manufacturing" under NAICS 332991), U.S. Census data over the last 15 years show a declining trend in the number of employees and production workers. From 1997 to 2011, the bearing industry suffered a 39% decrease in employment, losing over 14,000 employees (of which nearly 12,000 were production workers). Employment fell even more steeply in 2009 due to the economic recession, and gained back some employment in 2010-2011, but employment is still below the level of 2008.

Bearing Industry (NAICS 332991):
U.S. Employment

Year	All employees	Production workers
2011	22,320	18,268
2010	21,480	17,338
2009	20,680	16,166
2008	25,147	20,515
2007	27,346	22,048
2006	25,910	20,987
2005	25,795	20,773
2004	27,217	21,536
2003	27,655	22,717
2002	29,351	24,186
2001	32,222	26,290
2000	35,727	29,222
1999	35,964	29,441
1998	36,948	30,299
1997	36,547	29,827

Sources: U.S. Census Bureau, 2002 Economic Census, Manufacturing Industry Series, Ball and Roller Bearing Manufacturing (NAICS Code 332991); 2007 Economic Census, Manufacturing Industry Series, Ball and Roller Bearing Manufacturing (NAICS Code 332991); 2005-2011 Annual Survey of Manufacturers.

In addition, U.S. Department of Labor (DOL) certifications of eligibility for Trade Adjustment Assistance highlight the reality of the threat to U.S. jobs posed by any increase in bearing imports. DOL has approved a number of certifications for bearing workers in domestic plants in recent years. The statute provides that the Secretary of Labor will certify a group of workers as eligible to apply for adjustment assistance when (1) a significant number or proportion of the workers have at a firm or subdivision of a firm become totally or partially separated or are threatened with separation, (2) sales or production or both at the firm or subdivision have decreased absolutely, and (3) increases of imports of articles like or directly

competitive have contributed importantly to such total or partial separation, or threat thereof, and to such decline in production.[7]

Exhibit 1 presents a table listing 164 petitions, the vast majority of which resulted in certifications, filed on behalf of workers from U.S. bearing production facilities since 1975. These petitions and certifications provide additional evidence that the domestic bearing industry is highly susceptible to low-priced imported bearings.

E. In the TTIP Market Access Negotiations, Bearings Should Be Recognized as Import-Sensitive and Accorded An Extended Phase-Out Period.

The Final Report of the High Level Working Group on Jobs and Growth (February 11, 2013) recommended that the TTIP negotiations should seek to "eliminate all duties on bilateral trade" and phase out "all but the most sensitive tariffs in a short time frame." *HLWG Final Report* at 3 (emphasis added). It also recognized that "both sides should consider options for the treatment of the most sensitive products." *Id.* Similarly, in the U.S. Trade Representative's letter to Speaker Boehner notifying Congress of the administration's intent to enter into the TTIP negotiations, USTR stated that the United States would "seek to eliminate all tariffs and other duties and charges on trade in agricultural, industrial, and consumer products between the United States and the EU, with substantial duty elimination on entry into force of an agreement, transition periods where necessary for sensitive products, and appropriate safeguard mechanisms to be applied if and where necessary." Letter from Ambassador Demetrios Marantis, Acting United States Trade Representative to House Speaker John Boehner (March 20, 2013) at 2

[7] 19 U.S.C. § 2272(a).

(emphasis added). Thus, both the HLWG and USTR recognize that import-sensitive products should be accorded longer transition periods for tariff reduction and elimination.

The increased imports of bearings from the EU and elsewhere underscore the intensely competitive nature of the bearing market and the importance of tariffs to U.S. bearing producers. As noted, bearings are import-sensitive products, and have been considered as such in previous trade negotiations. Continued recognition of bearings as import-sensitive is critical to the industry's continued survival and ability to continue to invest in plant, technology and training. If current tariffs are eliminated or reduced too quickly, the industry's ability to presently compete and to adapt to lower tariffs would be hampered. Thus, in the TTIP market access negotiations, the U.S. should seek to account for the import-sensitivity of bearings by providing that the longest phase-out period shall apply to U.S. imports of bearings from the EU. An extended tariff phase-out period is essential to provide U.S. bearing producers adequate time to adapt to tariff liberalization.

Such treatment would be consistent with previous free trade agreements negotiated by the United States, in which bearings were recognized as import-sensitive products and thus were placed in a staging category with extended phase-out periods. For example, in the North American Free Trade Agreement, bearings of heading 8482 were given a 10-year phase-out

period,[8] and in the U.S.-Korea FTA, bearings of heading 8482 and subheading 8483.30.80, were provided a 10-year phase-out period.[9]

III. Rules of Origin Should be Effective in Limiting Preferential Tariff Treatment to Eligible Products

A. TTIP Rules of Origin for Bearings of Heading 8482 and Subheading 8483.30.80, HTS, Should Limit Eligibility for Preferential Tariff Treatment to Bearing Products That Undergo a Tariff Shift at the Heading Level or By an Addition of Appropriate Regional Value Content.

The preferential rules of origin for the TTIP will determine whether imported bearing products of heading 8482 and subheading 8483.30.80 receive preferential tariff treatment under the TTIP. The USTR's letter to Speaker Boehner said that the United States would "seek to establish rules of origin that ensure that duty rates under an agreement with the EU apply only to goods eligible to receive such treatment and define procedures to apply and enforce such rules." Letter from Ambassador Demetrios Marantis, Acting United States Trade Representative to House Speaker John Boehner (March 20, 2013) at 3. Timken believes that clear and predictable rules of origin are essential and necessary for the successful operation of any TTIP agreement.

Preferential rules of origin establish whether a product from a country that is a party to a free trade agreement (FTA) qualifies for preferential tariff treatment when that product is imported into a country that is also a party to the FTA. Preferential tariff treatment under an FTA encourages production in FTA countries and is intended to benefit only FTA-member

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[8] NAFTA Annex 302.2 (US tariff schedule) at 606 (placing 8482 products in staging category C), *printed in* H.Doc. 103-159, Vol. 2, 103d Cong., 1st Sess. 2378 (1993). NAFTA Annex 302.2 provided that duties on goods in staging category C would be removed in 10 equal annual stages from January 1, 1994 to January 1, 2003.

[9] US-Korea Free Trade Agreement (KORUS), Annex 2-B (US tariff schedule) at 177 (placing goods of heading 8482 and subheading 8483.30.80 in staging category G). KORUS Annex 2-B provides that duties on goods in staging category G will be removed in 10 equal annual stages.

countries. Thus, FTA rules of origin should not allow "free riders" to benefit. In other words, products from a non-FTA country should not receive preferential tariff treatment merely because it may have been transshipped through an FTA country or because some minor processing operations occurred in an FTA country. Thus, Timken supports rules of origin based on clear tariff shifting and regional content rules, such as those established in NAFTA and recent FTAs, which are intended to ensure that goods meet the tariff heading changes and regional content requirements before they receive preferential treatment. See Exhibit 2.

With respect to bearing products of heading 8482 and subheading 8483.30.80, HTS, the U.S. should support the principle that no change in origin occurs to an imported bearing product unless the imported product undergoes a tariff shift change at the 4-digit heading level, or there is otherwise a specific rule (*e.g.*, regional value content) that provides a basis for eligibility. This approach has concrete benefits – it is easy for customs officials to administer, it will increase efficiency in processing shipments, it is fair in application, and will lead to improved certainty of results – which is a key goal of businesses seeking enhanced market access.

However, Timken also supports establishment of a clear rule that specifically disallows conferral of TTIP origin to imported bearing products that merely undergo a process of simple assembly in a TTIP country, without having significant value added to the product. Such a rule is necessary to prevent circumvention of the rules of origin, whose purpose is to limit preferential treatment only to goods of a TTIP country. Specifically, Timken supports the following exception to the tariff shift rule:

- No change in origin is conferred to inner or outer rings (subheading 8482.99, HTS) when changed to finished bearings (subheadings 8482.10, 8482.20, 8482.30, 8482.50, HTS) unless significant manufacturing occurs in the process.

This threshold may be established by means of a regional value test. This exception to the tariff shift rule is already contained in NAFTA and many FTAs, such as the US-Korea FTA which provides:

> 113. (A) A change to subheadings 8482.10 through 8482.80 from any other subheading outside of that group, except from subheading 8482.99; or
>
> (B) A change to subheadings 8482.10 through 8482.80 from subheading 8482.99, whether or not there is also a change from any other heading, provided that there is a regional value content of not less than:
>
> (1) 40 percent under the build-up method, or
>
> (2) 50 percent under the build-down method.
>
> 114. A change to subheadings 8482.91 through 8482.99 from any other heading.[10]

In sum, Timken urges U.S. negotiators to include an exception to any tariff-shift rules of origin that will preclude origin being conferred on imported bearing parts that merely undergo simple assembly in a TTIP country.

IV. Trade Remedy Rights Should be Preserved and Strengthened

Timken believes that the survival of a healthy domestic bearing industry depends in part on effective trade law enforcement that will ensure that the industry can fight unfair trade practices. Timken has used, and continues to use, the trade remedies available to it. Thus, Timken strongly supports maintaining effective trade remedy laws in the United States. Moreover, without effective antidumping duty, countervailing duty, and safeguard laws, public support for further trade liberalization is doubtful. Accordingly, in the TTIP negotiations, the U.S. should seek to preserve the right of U.S. producers to use trade remedies and strengthen the

[10] US-Korea FTA, HTSUS General Note 33(o).

effectiveness of trade remedy laws. The U.S. should oppose any proposal that would effectively weaken or diminish trade remedy rights.

Respectfully submitted,

/s/ Terence P. Stewart

Terence P. Stewart
Geert De Prest
Patrick J. McDonough

STEWART AND STEWART
Special Counsel for The Timken Company

Exhibit 1

Petitions and Certifications for Trade Adjustment Assistance

NAIC 332991, SIC 3562

TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
81908	Rotek Incorporated	Aurora, OH	Company	0000	10/2/2012	Denied			
81743	Emerson Power Transmission	Ithaca, NY	Company	0000	7/12/2012	Certified		5/14/2012	7/12/2014
80530	The Timken Company	Altavista, VA	Workers	0000	2/2/2012	Certified		10/18/2010	2/2/2014
72862	SKF Aeroengine	Falconer, NY	Wkrs	3562	2/4/2010	Certified	7/16/2010	11/6/2008	2/4/2012
72411	Emerson Power Transmission	Ithaca, NY	State	3562	5/13/2010	Certified	6/30/2010	9/21/2008	5/13/2012
72397A	Timken Company	Bucyrus, OH	Wkrs	3562	1/8/2010	Certified		9/23/2008	1/8/2012
72397	Timken Company	Bucyrus, OH	Wkrs	3562	1/8/2010	Certified		9/23/2008	1/8/2012
72230	Frantz Manufacturing Company	Sterling, IL	Comp	3562	2/16/2010	Certified		9/2/2008	2/16/2012
71742	Kilian Manufacturing	Syracuse, NY	Wkrs	3562	10/28/2009	Certified		7/17/2008	10/28/2011
71674	The Timken Company	Pulaski, TN	Comp	3562	4/12/2010	Certified		7/10/2008	4/12/2012
71671	Rockwell Automation	Milwaukee, WI	Comp	3562	9/30/2009	Certified		7/8/2008	9/30/2011
71505A	The Timken Company	Canton, OH	USW	3562	12/8/2009	Certified		7/1/2008	12/8/2011
71505	The Timken Company	Canton, OH	USW	3562	12/8/2009	Certified		7/1/2008	12/8/2011
71402	The Timken Company	Randleman, NC	Wkrs	3562	11/4/2009	Certified		6/23/2008	11/4/2011
71074	American Roller Bearing & Manufacturing Co.	Hiddenite, NC	Comp	3562	3/26/2010	Denied			
70780	Federal Mogul Corporation	Blacksburg, VA	UAW	3562	12/14/2009	Certified		5/19/2008	12/14/2011
70510	The Timken Company	Rutherfordton, NC	Wkrs	3562	7/21/2009	Certified		5/14/2008	7/21/2011
65272	The Timken Company	Cairo, GA	State	3562	3/31/2009	Certified		2/12/2008	3/31/2011
65183	National Bearings company	Lancaster, PA	Comp	3562	4/22/2009	Denied			
64384	Timken Company	Dahlonega, GA	State	3562	2/5/2009	Denied			
64079	SKF Automotive Division	Glasgow, KY	Comp	3562	10/10/2008	Certified		9/18/2007	10/10/2010
63825	Accuride International, Inc.	Santa Fe Springs, CA	Comp	3562	9/3/2008	Certified		8/5/2007	9/3/2010
63682	Artistics Plating and Metal Finishing, Inc.	Anaheim, CA	Comp	3562	8/1/2008	Certified		7/14/2007	8/1/2010
63402	NTN-BCA Corporation	Lititz, PA	USW	3562	7/14/2008	Certified		5/18/2007	7/14/2010
62870	Timken US Corporation	Clinton, SC	Wkrs	3562	3/18/2008	Certified		2/20/2007	3/18/2010
61977	Hoover Precision Products, Inc.	Erwin, TN	Comp	3562	10/1/2007	Certified		8/10/2006	10/1/2009
61968	Rockwell Automation	Mayfield Heights, OH	Comp	3562	8/22/2007	Termination - investigation was terminated prior to a decision.			
60951	Hartford Technologies	Rocky Hill, CT	Wkrs	3562	3/13/2007	Certified		11/18/2006	3/13/2009
60941	Hoover Precision Products, Inc.	East Granby, CT	Comp	3562	2/27/2007	Certified		2/2/2006	2/27/2009
60427	Tyson Bearing Co., Inc.	Glasgow, KY	Wkrs	3562	12/4/2006	Certified		10/30/2005	12/4/2008
60369	Hoover Precision Products, Inc.	East Granby, CT	Comp	3562	12/7/2006	Denied			
60347	Timken US Corporation	Torrington, CT	UAW	3562	2/21/2007	Denied			
60204	Schaeffler Group USA	Joplin, MO	Comp	3562	10/31/2006	Denied			
59425	RBC Nice Bearings, Inc.	Kulpsville, PA	Comp	3562	6/21/2006	Certified		5/5/2005	6/21/2008

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TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
59247A	Saint Gobain Advanced Ceramics	East Granby, CT	Comp	3562	6/5/2006	Termination - investigation was terminated prior to a decision.			
59146	NTN - BCA Corporation	Lititz, PA	USW	3562	5/12/2006	Certified		6/12/2005	5/12/2008
58405	NSK Corporation	Ann Arbor, MI	UAW	3562	2/1/2006	Certified	4/11/2006	11/18/2004	4/11/2008
58205	Berliss Bearing Co.	Livingston, NJ	State	3562	11/22/2005	Certified		9/27/2004	11/22/2007
57964	Corlett-Turner Company	Zeeland, MI	Comp	3562	10/20/2005	Certified		9/14/2004	10/20/2007
57075	Accuride International, Inc.	Santa Fe Springs, CA	Comp	3562	6/2/2005	Certified		4/13/2005	6/2/2007
55670	Hartford Technologies Comp.	Rocky Hill, CT	State	3562	11/17/2004	Certified	12/6/2004	9/22/2003	11/17/2006
55019	Timken Company	Canton, OH	Comp	3562	6/10/2004	Termination - investigation was terminated prior to a decision.			
54236	Motion Industries, Inc.	Altoona, PA	Wkrs	3562	2/17/2004	Termination - investigation was terminated prior to a decision.			
54212	Timken Co. (The)	Pulaski, TN	Comp	3562	2/25/2004	Termination - investigation was terminated prior to a decision.			
53885	NTN-BCA Corp.	Greensburg, IN	Comp	3562	1/5/2004	Certified		12/23/2002	1/5/2006
53619	Timken US Corp	Rockford, IL	Wkrs	3562	12/8/2003	Certified		11/13/2002	12/8/2005
53503	NTN - BCA Corporation	Greensburg, IN	Comp	3562	12/23/2003	Termination - investigation was terminated prior to a decision.			
52929	Kaydon Corporation	Sumter, SC	Comp	3562	10/3/2003	Certified		9/15/2002	10/3/2005
52925	SKF USA, Inc.	Altoona, PA	Comp	3562	11/3/2003	Certified	2/17/2004	9/11/2002	11/3/2005
51898	MRC Bearings	Jamestown, NY	UAW	3562	6/24/2003	Certified		5/21/2002	6/24/2005
51437	NTN - BCA	Lititz, PA	USWA	3562	6/11/2003	Certified		3/31/2002	6/11/2005
50808	Thomson Industries	Port Washington, NY	Comp	3562	3/31/2003	Certified		12/31/2001	3/31/2005
41960	Hartford Ball	Rocky Hill, CT	UAW	3562	9/18/2002	Certified		7/24/2001	9/18/2004
41538	Tyson Bearing Co., Inc.	Glasgow, KY	USWA	3562	9/25/2002	Certified		4/17/2001	9/25/2004
40935	Nice Ball Bearing Co	Kulpsville, PA	USWA	3562	3/27/2002	Certified		1/22/2001	3/27/2004
40756	MRC Bearings	Jamestown, NY	UAW	3562	5/20/2002	Denied			
40640	Timken Company (The)	Canton, OH	USWA	3562	6/11/2002	Certified		10/14/2001	6/11/2004
40494	Accuride International	So. Bend, IN	Comp	3562	1/24/2002	Certified		12/17/2000	1/24/2004
40417	NTN Bower Corp	Hamilton, AL	Wkrs	3562	3/27/2002	Denied	10/3/2002		

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TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
39228	Emerson Power Trans.	Valparaiso, IN	IAM	3562	6/25/2001	Certified		4/26/2000	6/25/2003
39077	Nucor Bearing Products	Wilson, NC	Wkrs	3562	6/6/2001	Certified		4/6/2000	6/6/2003
36544	Guidon, Inc	Muskegon, MI	IAM	3562	9/17/1999	Certified		7/7/1998	9/17/2001
36477	Thomson Precision Ball	Unionville, CT	Comp	3562	8/4/1999	Termination - investigation was terminated prior to a decision.			
35864A	Timken Co (The)	Wooster, OH	USWA	3562	6/7/1999	Certified	10/13/1999	3/2/1998	10/13/2001
35864	Timken Co (The)	Canton, OH	USWA	3562	6/7/1999	Certified	10/13/1999	3/2/1998	10/13/2001
35540A	Flowline Division	Whiteville, NC	Comp	3562	2/1/1999	Certified		1/6/1998	2/1/2001
34343	Torrington Co (The)	Calhoun, GA	Comp	3562	6/5/1998	Certified		3/5/0197	6/5/2000
32232	The Timken Company	Columbus, OH	USWA	3562	6/13/1996	Certified		3/30/1995	6/13/1998
32018	SKF USA, Inc.	Shippensburg, PA	UAW	3562	3/28/1996	Certified		2/22/1995	3/28/1998
28951	Torrington Co	Newington, CT	UAW	3562	1/24/1994	Certified		7/13/1992	1/24/1996
27698	Timkin Co (the)	Canton, OH	USWA	3562	11/30/1992	Denied			
27055	Defontaine, Inc	Wales, WI	Wkrs	3562	6/18/1992	Denied			
26845A	Torrington Co	Newington, CT	Wkrs	3562	4/13/1992	Denied			
26845B	Torrington Co	Thomaston, CT	Wkrs	3562	4/13/1992	Denied			
26845	Torrington Co	Torrington, CT	Wkrs	3562	4/13/1992	Denied			
26398	TIMKEN CO (THE)	CANTON, OH	000094	3562	11/27/1991	Denied			
25955	ACCURATE BUSHING CO	GARWOOD, NJ	000107	3562	8/21/1991	Denied			
25591	FEDERAL MOGUL CORP	BLACKSBURG, VA		3562	5/16/1991	Denied			
25152	TIMKEN CO (THE)	CANTON, OH	000094	3562	2/28/1991	Denied			
25038	KUBAR BEARINGS	TROY, NY		3562	12/23/1990	Certified		10/23/1989	12/23/1992
24926	TIMKEN CO (THE)	COLUMBUS, OH		3562	11/28/1990	Denied			
24195	TIMKEN CO (THE)	CANTON, OH	000094	3562	5/25/1990	Denied			
23442	CORLETT-TURNER CO	HOLLAND, MI		3562	11/24/1989	Denied			
23245	TIMKEN CO (THE)	CANTON, OH	000094	3562	9/29/1989	Partial Certification - some, but not all, of workers at the facility are certified.		1/1/1989	9/29/1991
22832	SKF INDUSTRIES, INC	HORNELL, NY		3562	6/20/1989	Denied			
22738	SKF INDUSTRIES	GLASGOW, KY		3562	6/5/1989	Denied			
22610	TIMKEN CO	COLUMBUS, OH	000094	3562	4/10/1989	Denied			
20416	SKF INDUSTRIES	HORNELL, NY		3562	3/21/1988	Denied			
19379	HYATT CLARK INDUSTRIES	CLARK, NJ	000149	3562	5/13/1987	Denied			
18457	TORRINGTON/FAFNIR	ARKADELPHIA, AR		3562	12/12/1986	Certified		10/7/1985	12/12/1988
18167	FEDERAL MOGUL CORP.	MOORESVILLE, IN		3562	11/14/1986	Denied			
17941	TIMKEN COMPANY	COLUMBUS, OH		3562	11/19/1986	Certified		2/24/1986	11/19/1988

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TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
17780	TRW BEARINGS DIV.	PLAINVILLE, CT		3562	11/21/1986	Denied			
17757	TIMKEN CO	CANTON, OH		3562	10/15/1986	Certified		4/21/1985	10/15/1988
17578	L AND S BEARING COMPANY	AKLAHOMA CITY, OK		3562	12/3/1986	Denied			
17422	NEW DEPARTURE-HYATT	BRISTOL, CT	000149	3562	9/30/1986	Certified		4/28/1985	9/30/1988
17175	SKF INDUSTRIES	MASSILLON, OH	000094	3562	8/4/1986	Denied			
17063	PT COMPONENTS, INC	CLINTON, TN		3562	6/13/1986	Denied			
16649	SKF INDUSTRIES	SHIPPENSBURG, PA	000149	3562	5/23/1986	Denied			
16648	HYATT CLARK INDUSTRIES	CLARK, NJ	000149	3562	4/23/1986	Denied			
16496	TIMKEN COMPANY	BUCYRUS, OH		3562	2/11/1986	Certified		11/1/1984	2/11/1988
16495	TIMKEN COMPANY	ASHLAND, OH		3562	2/11/1986	Certified		11/1/1984	2/11/1988
16287	POWDER METAL PRODUCTS	ST MARYS, PA	000118	3562	1/28/1986	Denied			
16275	PROMETECH	ST MARYS, PA	000118	3562	3/3/1986	Denied			
15885	HOOVER NSK BEARING	WAYNE, NJ	000149	3562	7/10/1985	Certified		2/1/1985	7/10/1987
15805	SKF, INC.	ALTOONA, PA	000094	3562	7/2/1985	Certified		1/1/1985	7/2/1987
15722	FAFNIR BEARINGS	NEW BRITAIN, CT	000149	3562	4/17/1985	Denied			
15721	FAFNIR BEARINGS	NEWINGTON, CT	000149	3562	4/17/1985	Denied			
15211	TRW BEARINGS	JAMESTOWN, NY	000149	3562	8/6/1984	Denied			
15210	TRW BEARINGS	FALCONER, NY	000149	3562	8/6/1984	Denied			
15183	TIMKEN CO.	BUCYRUS, OH		3562	5/21/1984	Denied			
15161	TIMKEN CO.	PHILADELPHIA, OH		3562	7/12/1984	Certified		12/28/1982	7/12/1986
15150	TORRINGTON CO.	SO. BEND, IN	000149	3562	5/17/1984	Denied			
15139	WAUKESHA BEARING CORP.	WAUKESHA, WI	000107	3562	7/6/1984	Certified		12/5/1982	4/30/1984
15050	P.T. COMPONENTS INC.	INDIANAPOLIS, IN	000094	3562	6/4/1984	Certified		9/27/1982	6/4/1986
14959	TIMKIN COMPANY	COLUMBUS, OH		3562	2/24/1984	Certified		8/19/1982	2/24/1986
14449	L & S BEARING CO.	OKLAHOMA CITY, OK	000107	3562	11/14/1983	Partial Certification - some, but not all, of workers at the facility are certified.		2/17/1982	11/14/1985
14378	AMERICAN ROLLER BEARING	PITTSBURG, PA	000094	3562	9/15/1983	Denied			
14369	HOOVER UNIVERSAL INC.	ERWIN, TN	000094	3562	8/18/1983	Denied			
14268	GENERAL MOTORS CORP.	BRISTOL, CT	000149	3562	10/31/1983	Denied			
13984	TIMKEN CO.	CANTON, OH	000094	3562	8/18/1983	Certified		11/9/1981	1/1/1983
13797	MCGILL MFG CO., INC.	VALPARAISO, IN		3562	4/25/1983	Denied			
13519	TIMKIN COMPANY	COLUMBUS, OH	000094	3562	12/17/1982	Denied			
12871	ROLLER BEARING CO. OF AM.	TRENTON, NJ	000149	3562	7/8/1982	Denied			

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TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
12125	MCQUAY-NORRIS, INC.	INDIANAPOLIS, IN		3562	6/16/1981	Denied			
11966	SKF INDUSTRIES	MASSILLON, OH		3562	8/6/1981	Denied			
11899	G.M. CORPORATION	CLEVELAND, OH		3562	6/29/1981	Certified		7/1/1980	1/1/1981
11658	GOULD INC.	BRIDGEPORT, OH		3562	9/29/1981	Denied			
11510	HOOVER NSK BEARING CO.	ANN ARBOR, MI		3562	10/27/1981	Denied			
11420	FEDERAL MOGAL CORP.	GREENVILLE, MI		3562	9/28/1981	Denied			
10359	TIMKEN COMPANY	GAFFNEY, SC		3562	6/25/1981	Denied			
9912	GENERAL MOTORS CORP.	FARMERS BRANCH, TX		3562	6/29/1981	Denied			
9911	GENERAL MOTORS CORP.	MOLINE, IL		3562	6/29/1981	Denied			
9910	GENERAL MOTORS CORP.	ROCKY RIVER, OH		3562	6/29/1981	Denied			
9435	WICKES ENGINEERING	SAGINAW, MI		3562	6/30/1981	Denied			
9415	TIMKEN COMPANY	COLUMBUS, OH		3562	2/11/1981	Denied			
9137	POWER METAL PRODUCTS, INC	ST MARYS, PA	000058	3562	3/24/1981	Denied			
9031	NATIONAL MOLD PRODUCTS	MEADVILLE, PA	000058	3562	1/22/1981	Denied			
9025	CARBON CITY PRODUCTS CO.	ST. MARYS, PA	000058	3562	3/13/1981	Denied			
8727	TIMKEN COMPANY	BUCYRUS, OH		3562	11/28/1980	Denied			
7678	FMC CORPORATION	INDIANAPOLIS, IN	000094	3562	7/21/1980	Denied			
7532	BREMEN BEARING CO	BREMEN, IN	000149	3562	6/13/1980	Denied			
7529	SCHALTS FED'L BEARINGS	POUGHKEEPSIE, NY	000149	3562	6/3/1980	Certified		12/1/1979	6/3/1982
5782	SKF INDUSTRIES INC	ALTOONA, PA	000094	3562	9/24/1979	Denied			
5426	HOOVER-NSK BEARING CO	WAYNE, NJ		3562	7/13/1979	Denied			
4381	FAG BEARINGS CORP	STAMFORD, CT		3562	1/8/1979	Certified		3/1/1978	1/8/1981
4108	SKF IND INC	ALTOONA, PA		3562	11/20/1978	Certified		12/25/1977	9/9/1978
3343	SKF INDUSTRIES	PHILADELPHIA, PA		3562	9/22/1978	Denied			
3151	SKF INDUSTRIES, INC.	PHILADELPHIA, PA	000094	3562	9/22/1978	Denied			
2993	WESTERN BEARING CORP	STONE PARK, IL		3562	5/30/1978	Denied			
2991	UNIVERSAL BALL BLARINGS	STONE PARK, IL		3562	5/30/1978	Denied			
2983	PRECISION BALL BEARING	STONE PARK, IL		3562	5/24/1978	Termination - investigation was terminated prior to a decision.			
2982	PRATT MFG CO INC	SALINEVILLE, OH		3562	9/8/1978	Denied			
2807	TIMKEN CO	GAMBRINUS, OH	000094	3562	6/19/1978	Denied			
2755	SKF INDUSTRIES INC	ALTOONA, PA	000094	3562	3/24/1978	Certified		11/18/1976	5/1/1977
1812	TYSON BEARING CO.	MASSILLON, OH	000094	3562	9/20/1977	Denied			
1460	TIMKIN CO	CANTON, OH	000094	3562	7/8/1977	Denied			

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TAW number	Company	Location	Petitioners	SIC	Decision Date	Decision	Date of Latest Reconsideration or Revision or Correction	Impact date	Expiration date
881	TORRINGTON CO	TORRINGTON, CT		3562	8/11/1976	Denied			
723	ROLLWAY BEARING CO	LIVERPOOL, NY		3562	6/9/1976	Denied			
390	SKF INDUSTRIES INC.	SHIPPENSBURG, PA	000149	3562	3/15/1976	Denied			
90	SKF INDUSTRIES	KULPSVILLE, PA	000094	3562	9/22/1975	Certified		11/11/1974	9/22/1977
89	SKF INDUSTRIES INC	HANOVER, PA	000094	3562	9/19/1975	Denied			
75	SKF INDUSTRIES INC	ALTOONA, PA	000096	3562	9/2/1975	Denied			
69	SKF INDUSTRIES INC	PHILADELPHIA, PA	000094	3562	9/2/1975	Denied			

Exhibit 2

Tariff Shift and Regional Content Rules for
8482 and 8483.30 HTS

Tariff Shift and Regional Value Content Rules
Heading 8482 and Subheading 8483.30

FTA	***Rules of Origin for*** **Heading 8482 and Subheading 8483.30**
NAFTA HTSUS General Note 12(t)	241. (A) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from tariff items 8482.99.05, 8482.99.15 or 8482.99.25; or (B) A change to subheadings 8482.10 through 8482.80 from tariff items 8482.99.05, 8482.99.15 or 8482.99.25, whether or not there is also a change from any subheading outside that group, provided there is a regional value content of not less than: (1) 60 percent where the transaction value method is used, or (2) 50 percent where the net cost method is used. 242. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 245. (A) A change to subheading 8483.30 from any other heading; or (B) A change to subheading 8483.30 from subheading 8483.90, whether or not there is also a change from any other heading, provided there is a regional value content of not less than: (1) 60 percent where the transaction value method is used, or (2) 50 percent where the net cost method is used.

FTA	***Rules of Origin for*** **Heading 8482 and Subheading 8483.30**
Singapore FTA HTSUS General Note 25(o)	137. (A) A change to subheadings 8482.10 through 8482.80 from any subheading, except from subheadings within that group and inner or outer rings or races of subheading 8482.99, or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group provided there is a regional value content of 50 percent based on the build-up method. 138. A change to subheading 8482.91 from any other heading. 139. A change to subheading 8482.99 from any other heading. * * * * * 142. (A) A change to subheading 8483.30 from any other heading, or (B) A change to subheading 8483.30 from another subheading, provided there is a regional value content of 50 percent based on the build-up method.
Chile FTA HTSUS General Note 26(n)	143. (A) A change to subheadings 8482.10 through 8482.80 from any subheading, except from any subheading within that group and from inner or outer rings or races of subheading 8482.99, or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group, provided there is a regional value content of 40 percent based on the build-up method. 144. A change to subheading 8482.91 from any other heading. 145. A change to subheading 8482.99 from any other heading. * * * * * 148. (A) A change to subheading 8483.30 from any other heading, or (B) A change to subheading 8483.30 from another subheading, provided there is a regional value content of 40 percent based on the build-up method.

FTA	***Rules of Origin for*** **Heading 8482 and Subheading 8483.30**
Australia FTA HTSUS General Note 28(n)	104. A) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from inner or outer rings or races of subheading 8482.99; or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99 whether or not there is also a change from any subheading outside that group, provided that there is a regional value content of not less than 50 percent based on the build-up method. 105. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 108. (A) A change to subheading 8483.30 from any other heading, or (B) A change to subheading 8483.30 from any other subheading, provided that there is a regional value content of not less than 50 percent based on the build-up method.
DR-CAFTA HTSUS General Note 29(n)	119. (A) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from inner or outer rings or races of subheading 8482.99; or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group, provided there is a regional value content of not less than 40 percent when the build-up method is used. 120. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 123. (A) A change to subheading 8483.30 from any other heading, or (B) A change to subheading 8483.30 from any other subheading, provided there is a regional value content of not less than 40 percent when the build-up method is used.

FTA	***Rules of Origin for*** **Heading 8482 and Subheading 8483.30**
Peru FTA HTSUS General Note 32(n)	122. (a) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from inner or outer rings or races of subheading 8482.99; or (b) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group, provided that there is a regional value content of not less than 40 percent under the build-up method. 123 A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 126. (a) A change to subheading 8483.30 from any other heading, or (b) A change to subheading 8483.30 from any other subheading, provided that there is a regional value content of not less than 40 percent under the build-up method.
KORUS FTA HTSUS General Note 33(o)	113. (A) A change to subheadings 8482.10 through 8482.80 from any other subheading outside of that group, except from subheading 8482.99; or (B) A change to subheadings 8482.10 through 8482.80 from subheading 8482.99, whether or not there is also a change from any other heading, provided that there is a regional value content of not less than: (1) 40 percent under the build-up method, or (2) 50 percent under the build-down method. 114. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 117. (A) A change to subheading 8483.30 from any other heading; or (B) A change to subheading 8483.30 from any other subheading, provided that there is a regional value content of not less than: (1) 40 percent under the build-up method; or (2) 50 percent under the build-down method.

FTA	*Rules of Origin for* **Heading 8482 and Subheading 8483.30**
Colombia FTA HTSUS General Note 34(o)	122. (A) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from inner or outer rings or races of subheading 8482.99; or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group, provided that there is a regional value content of not less than 40 percent under the build-up method. 123. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 126. (A) A change to subheading 8483.30 from any other heading, or (B) A change to subheading 8483.30 from any other subheading, provided that there is a regional value content of not less than 40 percent under the build-up method.
Panama FTA HTSUS General Note 35(o)	109. (A) A change to subheadings 8482.10 through 8482.80 from any subheading outside that group, except from inner or outer rings or races of subheading 8482.99; or (B) A change to subheadings 8482.10 through 8482.80 from inner or outer rings or races of subheading 8482.99, whether or not there is also a change from any subheading outside that group, provided that there is a regional value content of not less than 40 percent under the build-up method. 110. A change to subheadings 8482.91 through 8482.99 from any other heading. * * * * * 113. (A) A change to subheading 8483.30 from any other heading; or (B) A change to subheading 8483.30 from any other subheading, provided that there is a regional value content of not less than 40 percent under the build up method.