

March 10, 2013

The Honorable Douglas Bell
Chairman, Trade Policy Staff Committee
Office of the United States Trade Representatives
600 17th Street, NW
Washington, DC 20508
Submitted via www.regulations.gov

Re: Request for Comments Concerning the Proposed Transatlantic Trade and Investment Partnership, [Docket No. USTR-2013-0019]

Dear Mr. Bell:

This statement is submitted by the American International Automobile Dealers Association (AIADA) in response to the United States Trade Representative's request for comments concerning the proposed Transatlantic Trade and Investment Partnership (TTIP). Established in 1970, AIADA is and continues to be the only association whose sole purpose is to represent America's 9,600 international nameplate automobile franchises that sell and service vehicles in the U.S. These retailers have a positive economic impact both nationally and in the local communities they serve, providing nearly 400,000 American jobs.

On behalf of our dealer members, we support the president's decision to recognize the immense positive impact that a strengthened U.S. – EU trade agreement would bring. Growing the world's largest economic relationship, which already accounts for one third of all goods and services trade and nearly half of global economic output, is a win for all those involved. The United States government and businesses should be able to use every available tool, including the promotion of exports and investment flows, to stimulate its economy. Thanks in part to its reciprocal trade agreements; the United States has become the world's largest exporter. One in five U.S. jobs now depends on exports.

Over the past twenty-five years, and especially in the last year, free trade has substantially improved the auto industry in the U.S. With access to the latest in technology, business practices, and manufacturing flexibility, automakers are retooling and shifting resources like never before in order to meet the ever-evolving needs of drivers, and compete successfully in a global economy.

Through American-based manufacturing plants, research and design centers, a consortium to discover improvements in alternative fuel vehicles, retail stores, and auto dealers actively involved in local communities, the international brand auto industry in the U.S. is today deeply woven into the fabric of our country. In the years to come, the auto industry and its many subsidiaries will continue to be a major slice of the global economy, and international automakers a particularly essential ingredient here in America – the world's most powerful market.

Research also shows that international brand automakers have invested billions of dollars in the U.S., operating over 21 vehicle manufacturing plants. Direct employment for these automakers has reached over 125,000, while payrolls at international brand dealerships in the U.S. reached an estimated 400,000 Americans.

These types of investment activities and related derivative investments have been a staple of our 21st Century economy and are the result of our government's commitment to free trade. By continuing to welcome these investments from various automakers and companies from myriad other industries, Americans have realized significant benefits.

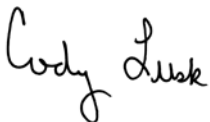
The truth is that free trade spurs global competition. That competition, combined with adaptable skills and hard work, is inextricably connected to the drive for continued innovation, productivity, and ultimately, more abundant and desirable choices for American consumers.

AIADA strongly supports the decision to promote a trade agreement between the U.S. and the EU based on the findings from the High Level Working Group (HLWG) that was designated to determine parameters to benefit all countries and promote economic growth and job creation. Specifically AIADA agrees with the focus as stated by the USTR to, eliminate or reduce conventional barriers to trade in goods, such as tariffs and tariff-rate quotas; enhance compatibility of regulations and standards; eliminate, reduce, or prevent unnecessary "behind the border" non-tariff barriers to trade in all categories; and enhance cooperation for the development of rules and principles on global issues of common concern and also for the achievement of shared global economic goals.

Entering into such an agreement would allow for those countries included to operate under consistent regulations and avoid disruptions in the global auto industry. Because of the critical importance of this deal and the immediate and long-term benefits it would bring to all economies, we must unite on the broad benefits of a comprehensive agreement. Such an agreement will give our nation's businesses, workers, and consumers an advantageous position in the world market.

AIADA, its dealer members, and the employees of their 9,600 international nameplate franchises strongly support the advancement of a trade agreement between the United States and the European Union.

Sincerely,

A handwritten signature in cursive script that reads "Cody Lusk".

Cody Lusk
President