

October 21, 2025

Robby S. Saunders
Deputy Assistant Secretary for Technology Security
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, D.C. 20230

RE: Steel and Aluminum Inclusion Requests

Dear Deputy Assistant Secretary Saunders:

Alliance for Automotive Innovation (“Auto Innovators”) submits these comments in response to various requests for inclusion of derivative aluminum and steel articles within the scope of the duties imposed under Proclamation 10895, “Adjusting Imports of Aluminum into The United States” and Proclamation 10896, “Adjusting Imports of Steel into the United States.” We appreciate the opportunity to provide the auto industry’s perspective on these inclusion requests.

Auto Innovators represents the full auto industry, including the manufacturers producing most vehicles sold in the U.S., equipment suppliers, battery producers, semiconductor makers, technology companies, and autonomous vehicle developers. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing over 5 percent of the country’s GDP, responsible for supporting nearly 11 million jobs, and driving \$1.5 trillion in annual economic activity, the automotive industry is the nation’s largest manufacturing sector.

Auto Innovators supports the Administration’s goals of protecting America’s steel and aluminum industries and ending unfair trade practices. Auto Innovators also shares the Administration’s commitment to increasing automotive production in the U.S and to ensuring the health and competitiveness of the auto industry in the U.S. To ensure that these important priorities are appropriately balanced, the inclusion of additional derivative items under Proclamation 10895 and Proclamation 10896 should be closely assessed in the context of other existing trade-related actions impacting the auto industry. Policy alignment will reduce uncertainty, avoid adding unnecessary costs, and position the industry for near- and long-term success.

To that end, Auto Innovators respectfully urges Bureau of Industry and Security (BIS) to reject requests for inclusion of any product that is already covered by Annex I to Proclamation 10908, “Adjusting Imports of Automobiles and Automobile Parts Into the United States.” We further urge BIS to reject any other requests that may negatively impact or interfere with the ability of auto companies to assemble vehicles or produce automotive components in the U.S. This approach would be generally aligned with the important step taken last week by President Trump to adjust the automobile tariff program to allow importers of record to declare an automobile part to be subject to tariffs under the automobile parts program, rather than other tariff programs.

Specifically, BIS should reject inclusion requests for the products identified below:

7326.90.8688	Articles of Iron or Steel
8302.30.3060	Other Mountings, Fittings and Similar Articles Suitable For Motor Vehicles, and Parts Thereof, Of Iron Or Steel, Aluminum Or Zinc
8412.90.9015	Parts of Hydraulic Engines & Motors, Except Linear Acting
8413.50.0080	Hydraulic Fluid Power Pumps Other Than Radial Position Type
8414.59.6540	Other Fans, Suitable for Use with Motor Vehicles, Others
8414.80.0500	Air Compressors, Turbochargers and Superchargers
8415.20.00	Automotive Air Conditioners
8479.89.9599	Other Machines and Mechanical Appliances Having Individual Functions, Not Specified or Included Elsewhere In Chapter 84; Parts Thereof
8483.10.1030	Camshafts And Crankshafts for Vehicles of Chapt 87, Except Motorcycles, For Use with Spark-ignition Internal Combustion Piston Engines or Rotary Eng
8483.90.8080	Parts of Clutches, Universal Joints, Pulleys, Flywheels and Transmission Shafts; Others
8507.90.8000	Parts of Electric Storage Batteries
8544.30.0000	Insulated Ignition Wiring Sets & Wiring Sets for Vehicles, Aircraft or Ships
8708.30.5030	Brake Rotors (discs) Of Vehicles of Headings 8701 to 8705
8708.30.5090	Brakes and Servo-brakes and Parts, Others, Of the Motor Vehicles of Headings 8701 To 8705
8708.70.4530	Road Wheels For Vehicles of Subheading 8702, 8704, or 8705
8708.70.4546	Road Wheels of Aluminum, Having A Diameter Of At Least 57 cm but Not More Than 63 cm, For Vehicles
8708.70.4548	Road Wheels of Aluminum, For Vehicles, Others
8708.91.5000	Radiators for Vehicles Other Than Tractors Suitable for Agricultural Use
8708.99.6805	Drive Shafts of Motor Vehicles of Headings 8701 To 8705
8708.99.6890	Parts of Motor Vehicles, Others, Of Headings 8701 to 8705: Other Parts for Power Trains
8708.99.8180	Parts, Others, Of Motor Vehicles, Others, Of Headings 8701 to 8705

Auto Innovators appreciates your careful consideration of these requests. We welcome the opportunity to work with BIS on this and other matters critical to the auto industry.

Sincerely,



Hilary M. Cain
Senior Vice President, Policy