AMERICANS FOR
FREE ★ TRADE

January 17, 2023

The Honorable Katherine Tai
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20006

RE: Request for Comments in Four-Year Review of Actions Taken in the Section 301 Investigation: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation (Docket No. USTR-2022-0014)

Dear Ambassador Tai:

The Americans for Free Trade coalition, a broad alliance of American businesses, trade organizations, and workers united against tariffs, respectfully submits these comments on the Request for Comments in Four-Year Review of Actions Taken in the Section 301 Investigation: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation (Docket No. USTR-2022-0014). We appreciate the opportunity to provide comments on the section 301 tariffs against products from China. We urge their removal and elucidate below how the section 301 tariffs have not achieved their stated goal and have harmed U.S. businesses, workers, and consumers.

By way of background, Americans for Free Trade represents every part of the U.S. economy including manufacturers, farmers and agribusinesses, retailers, technology companies, service suppliers, natural gas and oil companies, importers, exporters, and other supply chain stakeholders. Collectively, we employ tens of millions of Americans through our vast supply chains. Our coalition was formed in 2018, when the prior Administration first imposed the section 301 tariffs on imports from China.

While we support efforts to hold China accountable for its acts, policies, and practices regarding intellectual property rights theft, forced technology transfers, and innovation, we do not believe tariffs are an effective approach to eliminating these measures and changing China's behavior. For the last four years, we have raised concerns that imposing tariffs would have little positive impact on Chinese behavior and disproportionate negative economic impacts on American businesses, workers, and consumers. Unfortunately, that concern has become a reality.

Since April 2018, U.S. Customs and Border Protection has assessed more than $165 billion in section 301 tariffs on American companies who import products from China. These taxes create tremendous uncertainty, increase the cost of doing business in the United States, and place a financial burden on American businesses – negatively impacting their ability to invest in their companies, hire more American workers, innovate new technologies, and remain competitive globally. For many companies, the tariffs are a primary impediment to growing their businesses in the U.S. More recently, American companies have faced increased uncertainty as a result of the COVID-19 pandemic, historic supply chain disruptions, rising energy costs, and runaway inflation. And the tariffs result in increased prices for goods that American families need. In short, tariffs have had a negative impact across the U.S. economy, as further illustrated below by excerpts from testimonials provided by businesses representing a variety of industries.

I. Tariffs Have Failed to Achieve Goals

The section 301 tariffs were first imposed over four years ago for the stated purpose of obtaining the "elimination of China's harmful acts, policies, and practices" [1] as it relates to forced technology transfer and the theft of intellectual property. No doubt, the purpose of the tariffs morphed as the trade war escalated unnecessarily. However, the statutorily required review under section 307 of the Trade Act of 1974 is meant to determine the effectiveness of the tariffs in compelling changes in China's behavior related to the *original* investigation and whether other actions would be more effective.

Our coalition does not believe the tariffs have been effective in remedying the unfair trade practices outlined by USTR in its 2018 report on China's technology practices. According to the 2019 White House Economic Report of the President detailing the effectiveness of the section 301 tariffs, "Rather than changing its practices, China announced retaliatory tariffs on U.S. goods." The tariffs have resulted in pain only for American businesses, workers, and exporters and harmed U.S. competitiveness, not China's.

We believe the Biden Administration understands the limited impact the tariffs have had on China and the disproportionate harm they have caused to Americans. In June 2022, Secretary of Commerce Gina Raimondo stated during an interview on CNN's State of the Union that tariffs on products such as household goods and bicycles do not serve a national security purpose and lifting these tariffs "may make sense." Similarly, when Secretary of the Treasury Janet Yellen testified before the House Ways & Means Committee in June 2022, she said the tariffs "really ended up being paid by Americans, not by the Chinese, hurt American consumers and businesses." Secretary Yellen further stated that the "Administration inherited a set of 301 tariffs imposed by the Trump administration that I think really weren't designed to serve our strategic interests." In the lead up to the 2020 election, President Biden also campaigned on the message that the tariffs resulted in "American farmers, manufacturers and consumers losing and paying more."[2]

The section 301 tariffs have caused disproportionate harm to U.S. workers, consumers, manufacturers, and businesses. For these and other reasons, USTR should abandon this failed policy and pursue other measures to address China's unfair trade practices more strategically and effectively.

---

[1] 83 Fed. Reg. 28710 (June 20, 2018).
[2] Jacob Pramuk, "Biden slams Trump's trade war even as he calls to 'get tough' on China," CNBC (Jul. 11, 2019).

II. Tariffs Have Harmed American Businesses and Consumers and U.S. Competitiveness

a. Tariffs Make U.S. Manufacturers Less Competitive

Proponents of the section 301 tariffs claim that lifting them – and even offering a targeted product exclusions process – would harm domestic manufacturing. We disagree. While protecting domestic manufacturing was never the stated purpose of the section 301 tariffs – unlike, for instance the Section 232 tariffs – they have been harmful to manufacturers by taxing inputs they need to produce more products domestically.

Consider the case of one manufacturer who has been producing speakers in the United States since 1949. This manufacturer produces speakers for nearly every audio application - mass transit, aerospace, medical equipment, professional audio, motorcycles, home audio, etc. Because it is one of the last companies that still builds speakers in the United States, the company has been unable to find domestic suppliers who can produce the specialty parts required for the speakers. To be globally competitive, the company must buy its components primarily from China where their global competitors purchase their parts. Unfortunately, these parts are on List 3 and are subject to an additional 25% tariff. The company described this as "a direct addition of 25% to our cost of goods sold." The company further stated that its competitors who import completed speakers made in China only pay a 7.5% tariff. The company said this makes it "less competitive than [its] USA competitors who import complete products made in China with no USA labor content" and that it is essentially "penalized for building speakers in America."

Because of the significant impact to its ability to compete, the company said it is now "moving more manufacturing out of the USA." In other words, the tariffs have *disincentivized* manufacturing in the United States.

An information technology company told us something similar. This American business pays tariffs on parts and components listed on Lists 3 and 4a and initially paid over $350 million per year in section 301 tariffs. The company moved some of its supply chain from China to Mexico to reduce this duty burden by a little more than half, but these increased costs were eventually passed along to customers through price increases. The company previously sought product exclusions on key parts and components under the Trump Administration – a process which no longer exists – but was denied. Because the company cannot source the parts and components from anywhere other than China, it is now considering whether to move its manufacturing to Mexico and then import the products into the United States duty-free – putting 1,300 American jobs in jeopardy.

The tariffs have also prevented small American businesses from growing. We spoke with a company that produces home theater accessories, and it described the impact of the tariffs on its products – which are on List 3 – as follows:

> *The tariff impacted us in three major ways. 1. The best manufacturers are all located in China for our products. Finding new manufacturers, even here in the US, was difficult to secure due to the premium level of our technology and design. Also with COVID happening immediately after List 3 was released, traveling abroad to find other manufacturers was impossible. 2. If we did find a manufacturer that was at our standard, the additional cost of building new tools, that had already been made and paid for in China, was a very hard burden on our small company. Also, we have to certify a good portion of our goods and any new product created from a new tool has to go through recertification at a cost that was also unbearable to our small business. 3. Being a brand new business, we secured funding to build and grow our brand, and immediately 20% of the funding went to a cost via the tariff that I had slated for new technology and product development, employees, and programs with our retail partners. It stunted our growth. Though there are more, these three actions have cost us in multiple ways the ability to grow and compete with businesses that have been around much longer.*

Another small business we spoke with imports industrial magnets from China that are incorporated into devices that work in vehicle engines to conserve fuel. The business owner produces these devices in the United States. The business owner told us that the section 301 tariffs have added a million dollars to his costs in the past several years. He described the impact as follows: "With this money I could have added at least one more engineer and support staff in the US. I also have European competitors who don't have the extra 25% cost. It's throwing money down a hole and makes no sense."

We spoke with another American manufacturer that produces a plastic material used in the development of U.S.-made parts for autos, farm equipment, transportation equipment and more. The value of the material comes largely from two key properties – hardness and rigidity. But to achieve these two key properties, the material must first be mixed with a specific chemistry that cures, or hardens, the final product. That essential hardening chemistry is not produced in the United States; it must be imported. Approximately 40 to 80 percent of the import is produced in China, with the balance produced in Japan and Taiwan. But there is not enough capacity in Japan and Taiwan to supplant the supply from China. Therefore, applying the section 301 tariff to this import does not hurt China – it hurts U.S. businesses which have no choice but to pay the tariff anyway to continue to enhance the competitiveness of their American made products.

These examples illustrate how the tariffs have both impacted small businesses and will continue to impact American businesses for as long as they remain in place. Consider the example of a small flower seed business that has paid "nearly $1.5 million in tariffs for seed produced in China." The company said that this money could have been used "for further investment in our technology, improving customer service or increasing seed quality." Because the seeds they cultivate "need that environment for cultivation purposes" (China), the business cannot readily shift production of additional seed to other locations to accommodate the tariffs. This small business also has European and Asian competitors who do not pay the tariffs, so it has been forced to absorb most of the costs to remain competitive. Most concerning, the business is considering moving jobs to China, which would also require transferring proprietary technology, to cope with the increased costs:

> *We have been exploring options to make better use of the farm and are looking at shipping seed that is produced in China to other markets to avoid the tariffs. This is rather cumbersome because we need to manage separate inventories, we need to much more carefully plan what we can place in China and it has caused us to move some jobs from the US to China to deal with this. If we ramp the activity up we will need to transfer some proprietary technology from the US to China or other countries which we prefer not to do.*

The section 301 tariffs have harmed, and continue to harm, U.S. manufacturers and make them less competitive vis-à-vis their competitors and China. They should be lifted immediately.

b. Tariffs Increase Costs for American Consumers and Contribute to Inflation

Proponents of the tariffs also ignore the very real contribution tariffs have had on inflation. While there are various contributing factors to inflation, lifting tariffs is one of the few tools that the Administration could utilize to bring down inflation.[3] At a time when inflation is at a four-decade high, the Administration should be leveraging every tool at its disposal to combat this crisis, which is squeezing hard-working American families and businesses. Time and again, we have heard from businesses of all kinds that they were forced to pass along the increased costs associated with the section 301 tariffs directly to their customers. Consider the statements we received from coalition members below:

> *There's a 25% supplemental tariff on our new product, [a type of lamp], we have to pass on the cost to customers (total tariff of 28%). We would lower the price right away if the Trump tariff were removed.*
>
> \- Consumer Electronics Company

> *We were impacted by Lists 3 and 4a, initially paying over $350M per year in tariffs. Supply chain moves - mostly from China to Mexico - cut that to where we are paying just over $150M per year today (2022). We immediately passed on the costs to our customers through price increases, which of course, is inflationary.*
>
> \- Information Technology Company

> *The 25% tariff (tax) has been nothing but that, a tax or penalty on us as a small US based business. The Chinese do not pay the tariff or any portion of it! We do not have the gross profit margins to absorb this tariff so as a result we need to incorporate this into what we charge our customer - more US based small businesses harmed by these tariffs/taxes.*
>
> \- Lighting Manufacturer and Distributor

[3] See the list of resources detailing the tariffs' impact on the U.S. economy.

The tariffs on our China origin goods has [sic] directly impacted or [sic] business strategy regarding the place of production for certain vegetable seed crops such as Cucumber, Melon, Tomato and Watermelon seeds. Producing hybrid vegetable seeds takes years of experience and knowledge. Weather, climate, and drought conditions are major factors especially as we are facing the global climate crisis. There are very few options for qualitied and trusted growers. Our Chinese suppliers have an excellent reputation and service levels sealed with production contracts that are reviewed by legal and signed each year. Who pays the price for these high tariff rates on China origin seeds? It is the American people who pay in the form of higher prices for healthy food in the US market place.

- Vegetable Seed Business

Rolling back the section 301 tariffs is an immediate action the Biden Administration can take to help ease cost pressures on U.S. businesses and bring down prices for American consumers.

c. Tariffs Create Uncertainty

In addition to imposing direct costs on American companies – and by extension their customers – the section 301 tariffs have had indirect costs as well. Many of these costs were associated with the uncertainty created by the rapid escalation of the tariffs when they were first imposed, whether they would remain in place, and whether targeted relief mechanisms – like a fair, transparent, and comprehensive exclusions process – would be available to minimize the economic harm to American businesses.

The rapid escalation of the section 301 tariffs throughout 2018 and 2019 is well known. It created tremendous uncertainty for companies trying to navigate the changing trade environment, make business decisions to minimize impact and understand the near, medium, and long-term impact the tariffs may have on their business operations.

But the uncertainty did not end with the imposition of the final tariff lists in 2019. It continued throughout the product exclusions process, which was rife with inconsistency, a lack of transparency, and contributed to the prolonged uncertainty that companies faced. During the exclusions process, USTR provided no insight as to why some exclusions were granted and others were denied, and the exclusions themselves were temporary. For example, USTR denied approximately 87 percent of the exclusion requests it received and when those were up for renewal, USTR declined to extend 75 percent of the product exclusions originally granted. The challenges presented by the now defunct exclusions process is well documented by the Government Accountability Office in a July 2021 report.[4]

---

[4] *See* "U.S.-China Trade: USTR Should Fully Document Internal Procedures for Making Tariff Exclusion and Extension Decisions," GAO Report 21-506 (July 28, 2021). ("GAO reviewed selected exclusion case files and found inconsistencies in the agency's reviews.")

The uncertainty caused by the tariffs continues, with no end in sight. Most of the exclusions previously granted have expired, leading to more tariff payments by U.S. companies. The unpredictable and opaque process for granting exclusions over the last four years disrupts supply chains as businesses scramble to find alternatives sourcing options when exclusions are allowed to lapse or are extended at the final hour.[5] This administration has provided a very limited reapplication of previously expired tariffs. Again, the process was opaque as to why some exclusions were granted and others were not, especially for HTS lines that had previously been granted an exclusion. We applaud the administration for extending both the COVID-related and small batch exclusions but providing the extension at the last minute continues to create uncertainty for businesses who are making purchasing decisions and setting contracts months in advance.

Because American businesses must make supply chain and sourcing decisions many months in advance, the uncertainty created by USTR's inaction compels our companies to incorporate 25 percent price increases into product lines that may soon be without a section 301 tariff exclusion. Upward pricing pressure of this kind will exacerbate inflation in an economy already teetering on the edge of stagflation, leaving consumers – and particularly low-income consumers – with reduced purchasing power and placing more goods out of their reach.

And while USTR maintains that the tariffs create negotiating leverage with China, it does not appear that any negotiations have taken place under this administration. We applaud President Biden's efforts to deescalate tensions during his meeting with Chinese President Xi Jinping in November 2022 and understand the serious national security concerns at issue in this relationship. However, we were disappointed that there was no mention of the ongoing trade war in the White House readout – which we believe is an area that the U.S. and China can work together. As International Monetary Fund Managing Director Kristalina Georgieva acknowledged recently, these tariffs are counterproductive and allowing the trade war to continue at a time when inflation is top-of-mind for people around the world would represent a profound economic risk.

In short, the tariffs have created a tremendous amount of uncertainty since their announcement and continuing through their implementation, the product exclusions process, and today. Certainty is critical for businesses to ensure that Americans have affordable access to the goods they rely on and to ensure they have the inputs they need to produce more here at home.

[5] This includes the most recent announcements to extend approximately 352 product exclusions and an additional 81 Covid-related exclusions. While we appreciate that USTR has extended both of these exclusion sets, the extension announcements came late from a business-planning perspective and the expiration dates of the current extensions do not align. This leaves businesses in a state of uncertainty about the treatment of these products going forward.

AMERICANS FOR FREE★TRADE

d. Tariffs Disproportionately Harm Low-Income American Families

Tariffs harm American families by raising prices on consumer products, and this is felt most acutely by low-income families. A report by the Progressive Policy Institute found that tariffs on consumer goods are discriminatory and regressive because low-income Americans are disproportionately impacted by these tariffs, especially single-parent families and people of color.

We spoke with a small American business that produces baby products, including a portable crib that it developed to promote a safe sleeping environment for infants and that is also subject to the section 301 tariffs. The company has distributed thousands of these cribs to low-income families for over 20 years through a non-profit organization, directly contributing to the reduction in infant deaths from Sudden Infant Death Syndrome (SIDS) and Accidental Suffocation and Strangulation in Bed (ASSB). The company stated that all proceeds from the sales of these cribs go back into the non-profit so that it can continue to provide its "partners with the tools to educate their communities about the importance of infant safe sleep." When asked about the impact of the tariffs on its mission, the company said this:

> *Until the tariffs were imposed, we prided ourselves on providing a safety approved crib … to our partners for under $50. Because of the 25% tariff and the increase in shipping from China, that was imposed on the [crib], we had to raise the price of our unit from $49.99 to $69.99, resulting in a decrease in the number of [cribs] that our partners were able to purchase since 2019 by well over 25%. What that means is 25% fewer infants have been able to sleep in a safe sleeping environment and babies lives have been put at risk. We know you can not effect immediate change in the high cost of shipping, however, by relieving us of the $25% tariff on our [crib] we will be able to reduce its price and assure that more babies lives will be saved from SIDS or ASSB.*

This baby products company ended its testimonial with a plea that the Administration consider the request that the tariffs be lifted to help "low-income parents throughout the country, and of course, the babies!"

This example could not be starker. The tariffs are harming U.S. businesses and Americans in ways large and small, including impacting the ability of small businesses and non-profits to get life-saving baby products into the hands of low-income families.

III. Recommended Procedural Next Steps

We urge USTR to take swift action to remove the section 301 tariffs. But in the interim, we urge USTR to take two important procedural steps before it concludes the necessity review.

First, we urge USTR to hold a public hearing for stakeholders to present testimony. Each tariff action put into place under section 301 has been accompanied by an opportunity to provide written comments and testimony at a public hearing. This gave stakeholders from all sides an opportunity to describe their views and gave the interagency Section 301 Committee an opportunity to ask questions and seek clarification on points raised in the written comments. While we recognize the administrative burden associated with a public hearing, we believe the importance and magnitude of this review requires it. Further, we note that the U.S. International Trade Commission successfully held a three-day public hearing last summer on the economic impact of the section 232 and 301 tariffs. USTR should follow suit.

Second, we renew our request for USTR to create a more robust exclusions process – one that is open to all products covered by the China 301 tariffs. We know this sentiment is shared by at least 141 bipartisan House members and 41 bipartisan Senators who have previously made a similar request. This exclusions process should be started immediately so that targeted relief is available during USTR's review. As long as the section 301 tariffs remain in place, there should be a fair, transparent, and robust exclusions process available so that American businesses can apply for targeted relief.

IV. Conclusion

We reiterate our call for an immediate end to the section 301 tariffs on products imported from China. These tariffs have had a disproportionate economic impact on American companies, consumers, and workers across the U.S. economy. We urge the Administration to abandon this failed policy by rolling back the tariffs and pursuing a new and more effective strategy.

Thank you for the opportunity to provide insight on behalf of our membership. We look forward to the outcome of USTR's review.

Sincerely,

Accessories Council
ACT | The App Association
Agriculture Transportation Coalition (AgTC)
ALMA, International (Association of Loudspeaker Manufacturing and Acoustics)
American Apparel & Footwear Association (AAFA)
American Association of Exporters and Importers (AAEI)
American Association of Port Authorities
American Bakers Association
American Bridal & Prom Industry Association (ABPIA)
American Chemistry Council
American Clean Power Association
American Coatings Association, Inc. (ACA)
American Down and Feather Council
American Fly Fishing Trade Association
American Home Furnishings Alliance
American Lighting Association
American Petroleum Institute
American Pyrotechnics Association
American Rental Association
American Specialty Toy Retailing Association
American Trucking Association
Arizona Technology Council
Arkansas Grocers and Retail Merchants Association
Association For Creative Industries
Association for PRINT Technologies
Association of American Publishers
Association of Equipment Manufacturers (AEM)
Association of Home Appliance Manufacturers

AMERICANS FOR FREE TRADE

Auto Care Association
Beer Institute
BSA | The Software Alliance
Building Service Contractors Association International (BSCAI)
Business Alliance for Customs Modernization
California Bottled Water Association
California Retailers Association
Can Manufacturers Institute
Central States Bottled Water Association
Chemical Industry Council of Delaware (CICD)
Coalition of New England Companies for Trade (CONECT)
Coalition of Services Industries (CSI)
Colorado Retail Council
Columbia River Customs Brokers and Forwarders Assn.
Computer & Communications Industry Association (CCIA)
Computing Technology Industry Association (CompTIA)
Consumer Brands Association
Consumer Technology Association
Council of Fashion Designers of America (CFDA)
CropLife America
Customs Brokers & Freight Forwarders Assn. of Washington State
Customs Brokers & Freight Forwarders of Northern California
Electronic Transactions Association
Energy Workforce & Technology Council
Experiential Designers and Producers Association
Exhibitions & Conferences Alliance
Fashion Accessories Shippers Association (FASA)
Fashion Jewelry & Accessories Trade Association
Flexible Packaging Association
Florida Ports Council
Florida Retail Federation
Footwear Distributors and Retailers of America (FDRA)
Fragrance Creators Association
Game Manufacturers Association
Gemini Shippers Association
Georgia Retailers
Global Chamber®
Global Cold Chain Alliance
Greeting Card Association
Halloween & Costume Association (HCA)
Home Fashion Products Association
Home Furnishings Association
Household and Commercial Products Association
Idaho Retailers Association
Illinois Retail Merchants Association
Independent Office Products & Furniture Dealers Association (IOPFDA)
Indiana Retail Council
Information Technology Industry Council (ITI)
International Bottled Water Association (IBWA)
International Foodservice Distributors Association
International Housewares Association
International Warehouse and Logistics Association
International Wood Products Association
ISSA - The Worldwide Cleaning Industry Association
Jeweler's Vigilance Committee
Juice Products Association (JPA)
Juvenile Products Manufacturers Association
Leather and Hide Council of America
Licensing Industry Merchandisers' Association
Los Angeles Customs Brokers and Freight Forwarders Assn.
Louisiana Retailers Association
Maine Grocers & Food Producers Association
Maine Lobster Dealers' Association
Maritime Exchange for the Delaware River and Bay
Maryland Retailers Association
Michigan Chemistry Council
Michigan Retailers Association
Mid-America Bottled Water Association
Minnesota Retailers Association
Missouri Retailers Association
Motor & Equipment Manufacturers Association
Motorcycle Industry Council
NAPIM (National Association of Printing Ink Manufacturers)
National Association of Chain Drug Stores (NACDS)
National Association of Chemical Distributors (NACD)

National Association of Foreign-Trade Zones (NAFTZ)
National Association of Home Builders
National Association of Music Merchants
National Association of Trailer Manufacturers (NATM)
National Confectioners Association
National Council of Chain Restaurants
National Electrical Manufacturers Association (NEMA)
National Fisheries Institute
National Foreign Trade Council
National Grocers Association
National Industrial Transportation League (NITL)
National Lumber and Building Material Dealers Association
National Marine Manufacturers Association
National Restaurant Association
National Retail Federation
National Ski & Snowboard Retailers Association
National Sporting Goods Association
Natural Products Association
New Jersey Retail Merchants Association
North American Association of Food Equipment Manufacturers (NAFEM)
North American Association of Uniform Manufacturers and Distributors (NAUMD)
North Carolina Retail Merchants Association
Northeast Bottled Water Association
Northwest Bottled Water Association
Ohio Council of Retail Merchants
Outdoor Industry Association
Pacific Coast Council of Customs Brokers and Freight Forwarders Assns. Inc.
Pennsylvania Retailers' Association
PeopleforBikes
Personal Care Products Council
Pet Food Institute
Pet Advocacy Network
Plumbing Manufacturers International
Power Tool Institute (PTI)
PRINTING United Alliance
Promotional Products Association International
Recreational Off-Highway Vehicle Association
Retail Association of Maine
Retail Council of New York State
Retail Industry Leaders Association
Retailers Association of Massachusetts
RISE (Responsible Industry for a Sound Environment)
RV Industry Association
San Diego Customs Brokers and Forwarders Assn.
SEMI
Semiconductor Industry Association (SIA)
Snowsports Industries America
Software & Information Industry Association (SIIA)
South Atlantic Bottled Water Association
South Dakota Retailers Association
Southeast Bottled Water Association
Specialty Equipment Market Association
Specialty Vehicle Institute of America
Sports & Fitness Industry Association (SFIA)
TechNet
Telecommunications Industry Association (TIA)
Texas Retailers Association
Texas Water Infrastructure Network
The Airforwarders Association
The Fertilizer Institute
Toy Association
Travel Goods Association
Truck & Engine Manufacturers Association (EMA)
United States Council for International Business
United States Fashion Industry Association
US Global Value Chain Coalition
US-China Business Council
Virginia Association of Chain Drug Stores
Virginia Retail Federation
Virginia-DC District Export Council (VA-DC DEC)
Vinyl Institute
Washington Retail Association
Water Quality Association
Window and Door Manufacturers Association
World Pet Association, Inc. (WPA)