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International Imaging Materials Inc.
310 Commerce Drive • Amherst, NY 14228-2396
p 716.691.6333 • f 716.250.2910• www.iimak.com

April 23, 2018

Office of the United States Trade Representative

RE: Docket No. USTR-2018-0005
Notice of Determination and Request for Public Comment Concerning Proposed Determination of Action Pursuant to Section 301: China's Acts, Policies and Practices Related to Technology Transfer, Intellectual Property, and Innovation

Ladies and Gentlemen:

Requiring tariffs on Thermal Transfer Printing Ribbons ("TTR"), subheadings 3702.39, 3702.42, 3702.44 and 9612.10 of the Harmonization Tariff Schedule of the United States, imported from China will help to reduce the negative impact certain acts, policies and practices occurring in China have on the United States.

International Imaging Materials, Inc. ("IIMAK"), located in Buffalo, New York, has nearly 400 employees in the US. Our primary product is TTR. TTR is a consumable used to print variable information, including barcodes or date information, on labels, packaging or other media. TTR is used in many industries and in most countries. IIMAK and another domestic company are the only manufacturers of TTR, from a list of large and small global competitors, that produces ink and coats the ink onto PET film exclusively in the US.

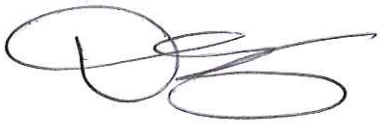
We believe nearly $20,000,000 of TTR, representing approximately 25% of the low cost TTR category, is imported into the US directly by Chinese companies and is sold at below market prices. To facilitate exporting Chinese produced TTR to the US, the Government of China provides subsidies to Chinese TTR manufactures and their suppliers through low cost loans, low cost raw materials, low cost energy and other export incentives. These subsidies are negatively impacting IIMAK and our employees as well as the suppliers and contractors we do business with in the US.

In addition, during 2008, the Commerce Department imposed an antidumping duty order on PET film imported from China. PET film is a major raw material component of TTR. Chinese companies are circumventing the antidumping duty order by coating the PET film in China with ink, and then importing the coated PET film (ie, TTR) using the harmonization codes noted above, and selling these products in the US at below market prices. Furthermore, our non-Chinese global competitors purchase Chinese produced PET film, coat the PET film in their resident country and then import TTR into the US, facilitating the Chinese PET film suppliers' ability to circumvent the antidumping duty order.

Imposing tariffs on TTR imported from China will help to alleviate the negative impact that subsidies from the Government of China are creating in the US as well as help to reduce the amount

of the circumventing that occurs related to the antidumping duty order in the US for Chinese imported PET film.

Sincerely,



Douglas C. Wagner
President and Chief Executive Officer