April 20, 2018

The Honorable Robert E. Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20508

RE: Section 301 Investigation, Peoples' Republic of China

Dear Ambassador,

Pursuant to the agency's Section 301 investigation referenced above, Bestway respectfully requests that certain products be eliminated from the proposed additional tariff list; or, at least, distinguished from some other products included in these classifications.

Established in 1994, Bestway has devoted its efforts to strengthening research, design, development and manufacturing of high-quality and innovative outdoor leisure products. We also actively invest in and pursue more efficient alternative energy sources and material recycling initiatives with an emphasis on corporate sustainability and aiming to minimize the impact on the environment.

A major portion of our business is in Above Ground Pools ("AGP) and spas. These pools and spas require filtration systems with replaceable filter cartridges, along with many compatible products to compliment the pool/spa experience. Because the product descriptions identified in the proposed tariff list are overly-broad, we are very concerned that some of our products could theoretically fall into these classifications. The nature of our business does not include high-tech and/or IP-intensive products, which we understand are two (2) of the criteria for the decision to add the additional classifications to the HTS list.

To the best of our knowledge, the items we currently import related to the pool/spa filtration system are not manufactured anywhere within the USA. A tariff increase, from 0% to 25%, on these types of products would not only be detrimental to the commercial interests of US retailers currently importing these products but would also serve to reduce the market share of this industry significantly.

According to industry research studies, the AGP/SPA industry has grown over the past five (5) years due mainly to macroeconomic improvements. It is expected that revenue within this industry will expand even further over the next five (5) years. This expectation is predicated on the continued improvements of macroeconomic variables and the anticipated increase in swimming participation by the general public.

Needless to say, increases in tariffs for these products will pose a devastatingly negative impact on our industry within the US and, furthermore, will bring no economic or employment growth to the USA. Additionally, it will be the retailers, consumer and customers who will be affected through higher prices in the end.

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The products that pertain to our request are included in the classifications identified below. If it is determined that these classifications are to be kept on the list, Bestway kindly requests that consideration be made to distinguish the intended products from the other "unintended" products by providing a more robust product description in these subheadings.

HTS subheading	Product Description
84137020	Centrifugal pumps for liquids, not fitted with a measuring device, nesi
84191900	Storage water heaters, nonelectric
84212100	Machinery and apparatus for filtering or purifying water
84219900	Parts for filtering or purifying machinery or apparatus for liquids or gases

We thank you in advance for your consideration. Should you have any questions or require anything further, please do not hesitate to contact us.

Very truly yours,

/Cammie R. Teems/

Cammie R. Teems, CP
Risk Manager