USTR
600 17th St.NW, Washington DC, 20508

Dear Sirs,

Thank you for opportunity to testify.

On behalf of ZTT Cable, we're a power cable, bare aluminum conductor for electrical transmission and distribution applications. Currently we have business for the products in more than 140 countries including North America.

Aluminum Conductor Steel Reinforced, well known as ACSR Cable, is bare aluminum stranding wires with steel stranding as strength core. All aluminum conductor are only stranded by aluminum wires. They are designated as hts code 7614.10 and 7614.90. ACSR and AAC conductors are used between power generation station to transfer electricity. ACSR is produced as per certain standards like IEC, BS EN or ASTM, which specify sizes, mechanical, electrical properties for these cables. Hence, different from fiber optic cable, ACSR is considered as "commodity" product by power utilities.

We noted that Southwire has announced these products imported from China are critical to the security of electrical grid in USA. This is not reasonable. I just list a few reasons below:

1. The import data of ACSR and AAC conductors that USA imported in the last five years indicated that China is only the 4th trade partner for these products, with a very small quantity supplied to the USA so far. I have attached these data in PDF attached to this letter.

2. These products are standard commodity products specified by related international standards, they need to be tested per these standards for quality purpose, before utility installs cables. How can they be critical to US electric grid? In another words, we have a lot of custom data showing that, Southwire, as well as CTC Global have exported these products or similar to such as Canada, Central America, South America, North Europe, China as well. Besides cable itself, Southwire also sells pretty lot of casting and rolling machines to other countries including China. As per Southwire's idea, may we understand this way --- Is Southwire attacking or treating power grid electricity of these countries, when they sell their power cables and aluminum conductor to these countries above? If Southwire say they did not attack any other country's grid security, why does Southwire complain oversea cable peers attack USA's grid security? In fact, Southwire still domain this market in North America and make up the biggest market share.

3. Manufacturers who supplied these materials to USA was to provide products only, no installation or maintain work was involved. Also there is no monitoring equipment involved or supplied by cable manufacturer. All install work will be done by utilities or their line contractors.

Based on these above, we request USTR to remove such as HTS Code: 7614 from imposed tariff list.

Title	U.S. imports
Products	Hs 761410 - aluminum stranded wire, cables, plaited bands and the like - steel core - non-insulated
Origin	All countries (detailed)
Destination	United States
Period	Latest 10 years
Units	Value in canadian dollars

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Mexico	8080447	6874539	10807543	18646465	49861137	30361570	26666047	29115608	25178129	29988259
Canada	40136219	17889393	23502786	31524260	29226641	25627783	11663127	11942394	10106328	27067939
Bahrain	175762	30387783	3254145	25739023	17378406	11325838	1644850	2817402	3757191	17035615
China	3483558	712637	2900315	7491238	13678418	8686693	14897982	16047491	7907534	10785346
India		428980	11142		27412923		1218308	581635	831067	777042
Brazil	18053		18791			60732	52729	220418	484081	428263
Germany		5226		4791	6870		6663	4156	6323	11156
Sweden		2768								8531
France		6524	2353			2462				8188
Italy	3872							3034	5881	2809
Mozambique									2997630	
Australia						2846		77457	1356275	
Japan	2976	32056			1271304	802996		2432911	541838	
Costa Rica									44353	
Israel	427406	2651007	346509	50558					7436	
Korea, South		30156	67448	615040	31758	3193			3651	
Taiwan	90815							3560		
Turkey	47422				253265		173615			
Luxembourg							5302			
Spain							2705			
United Kingdom	14404	8326	17744		222253	2927	2615			
Portugal					161800	792796				
Austria	2955		47621			66586				
Ecuador	110395					15558				
Oman (Muscat and Oman)					107774					
Colombia	398883	110838	438840		73865					
Russia					50071					
Finland				21687						
Honduras			4462							
Vietnam	255866	162829								
Denmark	6716									
Total All Countries	53255749	59303062	41419699	84093062	139736485	77751980	56333943	63246066	53227717	86113148

Source: Trade Data Online (accessed: June 27, 2018)

China Export Share in %	6.54%	1.20%	7.00%	8.91%	9.79%	11.17%	26.45%	25.37%	14.86%	12.52%

Title	U.S. imports
Products	Hs 761490 - aluminum stranded wire, cables, plaited bands and the like - without steel core - non-insulated
Origin	All countries (detailed)
Destination	United States
Period	Latest 10 years
Units	Value in canadian dollars

	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017
Turkey	6304389	2295594	1240946	3313687	3158218	1563382	367430	309003	5543492	5945108
Mexico	8893957	6464690	4067842	6475332	11643020	7198028	6501424	7937263	6014826	5753749
Canada	17202903	11891703	10610816	21566058	9888646	2236368	1310095	3805888	5189419	4529751
China	2611663	643341	242264	572137	6865630	3293797	2638271	5749112	5383221	3676426
Japan	16216	13704	21143	157173	17391	6498	739426	56103	1660572	2608333
India	31991	1537558	141216	4837	45347	199324	525940	2118270	2150284	2537775
Ecuador	239639	320092	273497	229584	503167	174637	327100	111302	405418	971254
Indonesia							25294	455711		913316
Bahrain						439756				614984
Italy					24919	8597	27955	110664	382091	541930
Norway	6161						30765	46302	74556	65473
Thailand			2565	23762	16792	3748			30341	40397
Taiwan	14214		15076	70475	146612	78799	88202	132026	96306	38519
Sweden	11666	5262					3076		8509	23558
Malaysia				27651		29352				19362
Switzerland (including Liche	24273	34920	10747	6518		206322	164149	19411	3911	19070
United Kingdom	83369	6850	2163	6969	47824	106343	156750	173921	47064	17026
France	21571	12561	12883	9436	6347	4467	25882			14037
Belgium	2346	410608	1836509	94487		25386	883133	121103		9407
Netherlands					37353	17651	34329	211840	3325	9317
New Zealand										7088
Germany	13840	2324	16578	4535	31600	9224	22165	19039	21464	6106
Spain		7822	55423		7271	163996	48443	49653	21967	4726
Croatia										4222
Denmark	7895				2051				5894	3682
Czech Republic							29137	5290	20104	2850
Korea, South	2942		5751	15310	4998	125246	16776	2053154	6722206	2809
Austria		2807	2387			8851		4279	3189	
Brazil	11703		19287			29669	5132	77561		
Poland					905452		2742	8924		
Hong Kong	22048							3580		
Philippines					5425	5590		3524		
Bahamas								3452		
Bulgaria					2192	30868	18180	2955		
Israel	49049	79745		6394	25937		9731	2564		
Venezuela	732875	83223				84592	123554			
Russia							33639			
Hungary							8465			
Pakistan					20399	6023	3149			
Costa Rica		2792	5329	5039	6722		2555			
Colombia	165870	98821	35519	41655	16853	5472				
Singapore						4730				
Argentina					6398					
Ireland	47593	3589	15523							
Morocco			3568							
Dominican Republic		4818								
Australia		2946								
Vietnam	12792									
Ukraine	2778									
Total All Countries	36533743	23925770	18637032	32631039	33436564	16066716	14172889	23591894	33788159	28380275

Source: Trade Data Online (accessed: June 27, 2018)

China Export Share in %	7.15%	2.69%	1.30%	1.75%	20.53%	20.50%	18.61%	24.37%	15.93%	12.95%