



Submitted via www.regulations.gov

May 5, 2014

Mr. Douglas Bell
Chair
Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Re: Request for Comments on the WTO Environmental Goods Agreement

Dear Mr. Bell:

The Information Technology Industry Council (ITI) welcomes the opportunity to provide comments on the Administration's intention to enter into negotiations for a World Trade Organization Environmental Goods Agreement, as announced in the Federal Register on March 28, 2014 (FR Doc. USTR-2014-0004). ITI's member companies are global innovation leaders spanning the information and communications technology (ICT) industry: infrastructure, computer hardware, software, IT services, consumer electronics, e-commerce, and Internet services.

ITI advocates global policies that advance technology and innovation, open markets, promote free and open competition, rely on market-based solutions, protect intellectual property, eliminate tariff and non-tariff barriers to trade, and develop and advance the use of global, voluntary standards. International trade and investment initiatives, particularly those aimed at opening foreign markets and expanding trade in ICT goods and services are high priorities for ITI. We strongly support the Administration entering negotiations on an ambitious, new tariff-reduction initiative to eliminate tariffs on environmental goods.

Dramatic innovations are underway that often bring many technology functions into one product; we would urge the U.S. government to adopt an expansive and ambitious approach to the Environmental Goods Agreement (EGA) to ensure that a wide range of new and innovative technologies designed to protect the environment and address climate change are included in a final agreement. We encourage the Administration to build on the progress made in the APEC Environmental Goods Initiative and significantly expand upon that list of 54 products in the WTO effort.



Environmental goods developed by our member companies relying on information technology that should be included in a U.S. government list include: environmental monitoring, analysis and assessment equipment; equipment used in the measurement, recording, and analysis of environmental impact; heating and cooling energy management systems, including thermal equipment such as heat exchange units, gas meters, liquid meters and electric meters; meters designed to allocate energy usage and cost; solar equipment technologies, including energy storage management systems; and catalytic converters including substrates used in systems to control exhaust emissions, such as three-way catalyst substrates, selective catalytic reduction (SCR) catalyst substrates, diesel and gasoline particulate filters and oxidation catalyst substrates.

ITI urges negotiators to pursue the most ambitious agreement possible and to ensure there are ways to allow for expansion of the product list to accommodate future technologies. This will help to ensure new innovations in the environmental goods arena are included and help address the issue of convergence of technologies. These components should be combined with active recruitment of additional parties to the agreement in order to ensure a broad geographical scope to the initiative.

Thank you for this opportunity to provide comments on the WTO Environmental Goods Agreement. Please do not hesitate to contact me at jneuffer@itic.org or 202-626-5735 if you have further questions or require any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "John F. Neuffer", is positioned below the word "Sincerely,".

John F. Neuffer
Senior Vice President for Global Policy