About ITI
ITI is a global trade association that represents over 70 of the world’s leading information and communications technology (ICT) companies. ITI’s membership comprises the leading global innovators from all corners of the technology sector, including hardware, software, digital services, semiconductors, network equipment, and platforms, as well as “technology-enabled” companies that rely on ICT to evolve their businesses. ITI engages policymakers around the world to promote innovation, security and sustained economic opportunity.

Overview
The ICT sector plays a crucial role in facilitating a comprehensive U.S. response to the COVID-19 crisis, from manufacturing critical healthcare-related devices and components, to supporting social distancing policies while providing products and services for telework, remote learning and tele-health arrangements. We applaud USTR and the Administration for already having moved to exclude some products subject to Section 301 tariffs, recognizing that such exclusions directly facilitate U.S. access to essential goods such as personal protective equipment and other medical-care related products. We appreciate the opportunity to provide input as USTR considers further modification of tariffs imposed under Section 301 with a view to enabling U.S. healthcare providers, companies and consumers to access the goods necessary to stem the impact of the COVID-19 outbreak.

In our submission we identify a number of specific ICT products for which relief from Section 301 tariffs would directly contribute to the U.S. economic and public health response to the current crisis. In addition to modification of Section 301 tariffs, we suggest that the U.S. government consider suspending most-favored nation (MFN) tariffs by creating additional chapter 98 codes on relevant medical-related products included in this document. We hope that our submission will be helpful in boosting the Administration’s efforts to enable U.S. access to much-needed resources.

How the ICT Industry Helps Combat COVID-19
Computers, mobile devices, office equipment, key networking equipment, data centers, and cloud services play a fundamental role in keeping the U.S. healthcare system running. These technologies enable healthcare professionals to easily communicate not just with each other, but also with government officials and the general public. A range of ICT products and components are at the heart of detecting and treating illnesses, recording and tracking vital signs, and conducting tests.

Along with producing key components and products that hospitals and healthcare professionals use every day, ICT companies also work around the clock to support and secure the networks and information of other critical sectors. In its recent guidance, the U.S. Department of Homeland Security’s Cybersecurity and Infrastructure Security Agency (CISA) designated a wide range of ICT workers – from those responding to cyber incidents, to software and hardware engineers, to
workers supporting the provision of global, national and local infrastructure for computing services – as essential to assuring the continuation of critical ICT manufacturing and uninterrupted delivery of essential services. These ICT professionals rely on many of the products and components for which near-term tariff modifications would prove the most impactful. More broadly, the products and services they develop maintain and deliver power the U.S. economy, to include the U.S. healthcare system, and enable the remote connectivity on which a significant segment of the economy currently relies. ITI has launched a directory\(^1\) of technology tools and resources made available by our members to educators, businesses and governments during the health crisis that is publicly available on our website.

As American states, cities, and towns continue to tackle the spread of COVID-19, our companies have taken significant measures to reduce risk to their employees and contribute to relief efforts across the country. In many manufacturing facilities, production has continued with new arrangements to reschedule and limit the density of workers, along with increased sanitation and health precautions. Cybersecurity companies are rapidly deploying technologies to secure remote workers. Our companies have also contributed medical supplies and donations to heavily affected areas and are striving to eliminate disinformation and instead promote well-researched best practices and advice to workers and consumers. We hope that USTR will consider alleviating the burden of tariffs to enable the ICT industry to continue to proactively respond to the outbreak.

Specific ICT Tariff Codes for Medical Equipment

**Processors, controllers, and electronic integrated circuits (8542.31.00)** are foundational to a variety of medical equipment to support imaging, radiology, anesthetics, respiratory aids, and displays for clinical review and diagnostics. Specifically, these integrated circuits are used in the following types of products:

- Positron Emission Tomography (PET) /Computed Tomography (CT) Equipment
- X-Ray Equipment
- Picture Archiving and Communications Systems (PACS)/Vender Neutral Archive (VNA)
- Capnography
- disinfection robots
- drug delivery devices
- electronic beds
- infusion pumps
- nebulizers and ventilators of several varieties
- sequencers/polymerase chain reaction (PCR)
- patient monitoring devices
- telepresence and therapy robots
- telepresence robots
- vital sign monitors
- RFID for patients and inventory

**Scanners (8471.90.0000, 8471.60.8000)** are specifically designed and produced to quickly scan key data points routinely used in the hospital and healthcare testing industries, including patient ID wristband badges, test kit bar codes, and medicine labels. Scanners expedite processing for high

\(^1\) [https://www.itic.org/policy/coronavirus-response](https://www.itic.org/policy/coronavirus-response)
volumes of test kits, such as those used currently for COVID-19 testing, and expedite inpatient registration at hospitals that are currently experiencing large influxes of COVID-19 related cases.

**CT scanners (9022.12.00)** use a rotating X-ray machine to image thin slices of the body to diagnose diseases and is far more detailed than a normal X-ray.

**Board mount pressure sensors (9026.20.40, 9027.90.59)** are critical to many items in the medical field, including:

- Anesthesia machines
- Blood gas analysis
- Gas chromatography
- Dialysis machines
- Oxygen concentrators
- CPAP / Ventilators
- Respiratory machines

**Patient monitoring devices and diagnostic apparatuses (9018.90.60, 9018.90.75)** cover a broad range of electrical or electronic equipment designed for the observation of a disease, condition or one or several medical parameters over time. USTR has already recently moved to grant exclusions to critical devices within these 8-digit categories, including electro-cardiographs and electronic thermometers. Additional relevant devices for which tariff modifications would be immediately beneficial include pulse oximeters or bedside monitoring stations used for continuous monitoring of various vital signs. Other relevant examples include extracorporeal membrane oxygenation instruments, which provide prolonged cardiac and respiratory support by removing blood from the person's body, artificially removing the carbon dioxide and oxygenating red blood cells.

**In vitro diagnostic test instruments (9027.80.45)** are used in clinical laboratories and are being deployed for use across the country to detect COVID-19, with companies receiving Emergency Use Authorization from the U.S. Food and Drug Administration.

**Monofilaments (3916.90.30), printers, and related printer parts** (see below) are emerging in the fight against COVID-19 as they are used for 3D printing and production of ventilators and other medical equipment.

- Multi-function printers (8443.31.00.00)
- Single function printers, including printers for 3D printing (8443.32.10.10, 8443.32.10.20, 8443.32.10.40, 8443.32.10.50)

**Specific ICT Tariff Codes for Additional Healthcare-essential Products**

Beyond specific medical equipment, all hospitals, clinics, and laboratories rely on printers and related equipment, computing devices and data storage for essential functions like printing and processing tests, recording patient information and results, and delivering diagnosis and treatment information to patients. Maintaining secure spaces and data also require card readers and up-to-date hardware that can support the latest security and cloud software. In addition to retaining valuable patient and medical research data, data storage elements provide the backbone of cybersecurity equipment needed to protect U.S. critical infrastructure.
Many of the products captured under these categories are also essential for the broader U.S. economic response to the COVID-19 outbreak, particularly in their ability to enable remote work and connectivity. A range of items that make up new systems of productivity for remote work, health, and education connections are also part of valuable data tracking. Governments and public health officials are actively using delivery data and information about network activity in order to identify both the spread of the virus and communities that may be particularly vulnerable to COVID-19.

- Printer ink (3215.11.90.60, 3215.19.90.60)
- Printer paper (4802.62.6140)
- Computer mice (8471.60.90.50)
- Computing workstations, desktop PCs, and server rack storage (8471.50.01.50)
- All-in-One Computers, computing workstations and computer systems (8471.41.01.50, 8471.49.00.00)
- Hard disk drives and other data storage units (8471.70.20.00, 8471.70.40.65, 8471.70.50.65, 8471.70.60.00, 8471.70.90.00)
- Docking Stations, USB Hubs, Adapters (8471.80.10.00)
- Card readers (8471.90.00.00)
- Other computer parts (8473.30.51.00)
- Memory modules (8473.30.11.40)
- Motherboards (8473.30.11.80)
- Electric generators (8502.13.00.40)
- Transformers (8504.23.00.41, 8504.23.00.45, 8504.23.00.80)
- Power supply units (8504.40.60.01, 8504.40.60.07, 8504.40.60.12, 8504.40.60.18, 8504.40.85.00)
- Modem (8517.62.00.10)
- Networking systems, e.g. switches, routers, and server racks (8517.62.0020)
- Transmission devices supporting voice and image recognition (8517.62.0090)
- Interface cards, routing engines, and chassis (8517.70.0000)
- Line telephone handsets (8518.30.10)
- Solid State Drive (8523.51.00.00)
- Cameras (8525.80.30.10, 8525.80.40.00, 8525.80.50.50)
- Switch (8536.50.70.00)
- Optical fibers (8536.70.00.00)
- Switchboards and switchgear (8537.10.91.20, 8537.20.00.20)
- Smart plugs and rack power distribution units (8537.10.91.70)
- Central and Graphic Processing Unit (CPU, GPU) (8542.31.00.01)
- Coaxial, telecommunication, and adaptor-fitted cables (8544.20.00.00, 8544.42.90.90, 8544.49.10.00)
- Copper cables (8544.49.30.40, 8544.49.30.80)
- Desk Chairs (9401.30.80.10, 9401.30.80.30)
- Rack rails and hardware (9403.10.00.40, 9403.90.80.41)
In addition, the following items are vital to logistics operations necessary to move critical consumer products, medical supplies and other essential goods during this crisis.

- Retention bands (5806.20.00.90)
- Drive unit components and mechanical subassemblies (8431.20.00.00)
- Gates (8479.90.94.96, 8479.89.94.99)
- Fuse terminal assemblies (8537.10.91.70)
- Pedestals (8543.70.99.60)
- Fabric bin arrays (9403.90.60.80)
- Hooks (9403.90.80.41)

Other Tariff Burdens on the Healthcare System

All ICT product lines identified to this point remain subject to Section 301 tariffs and are therefore eligible for immediate relief via modification by the Administration. In addition to these products, there are a host of other items currently subject to Section 301 and/or MFN tariffs that are essential to the U.S. public health response. Many of these products have been identified on a list that the World Customs Organization has produced to cover some, but not all, essential items to the COVID-19 response.² We would encourage USTR, working with the interagency and Congress, to strongly consider elimination of these tariffs.

*subject only to MFN tariffs
†subject only to Section 301 tariffs

- 3D printers and the formulated materials used to produce items such as FFP3 masks, face shields and medical labels (8477.80.00.00, 8477.90.85.95)*
- Ethyl alcohol solution (2207.10.6090)
- Hydrogen peroxide (2847.00.00)
- Hand sanitizer, disinfectant wipes and packets (3808.94)
- Other chemical disinfectants (3808.94)
- Plastic kit Labels (3919.10.20)
- Biohazard bags (3923.21.00)
- Plastic face shields (HTS 3926.20.40) †
- Rubber gloves (4015.19.10, 4015.19.50)
- Paper bed sheets (4818.90.00) †
- Paper kit labels (4821.90.20) †
- Knitted or crocheted gloves (6116.10.13, 6116.10.17)
- Protective hospital garments (6210.20, 6210.30, 6210.40, 6210.50)
- Textile gloves (6216.00)
- Textile face masks (6307.90.98) *
- Disposable hair nets (6505.00.0100)
- Protective spectacles and goggles (9004.90.00) *
- Gas masks (9020.00.60) *

**Conclusion**

ICT goods and services are a fundamental part of the U.S. healthcare system. Better access to ICT for both healthcare providers and patients enables healthier outcomes for society. This is true all of the time, but is particularly imperative in our current crisis. Similarly, greater access to productivity-enhancing ICT goods and services empowers the broader U.S. economic response to the outbreak.

Lifting tariffs on the items included in this submission will help to alleviate the strain on the healthcare system in the midst of dealing with COVID-19. Tariffs act as direct impediments to U.S. governments, consumers and businesses, and we would encourage the removal of tariffs by any means to increase confidence in the COVID-19 response and support economic recovery.

Thank you for the opportunity to comment. ITI and its members stand ready to continue to support governments and communities as we all respond to this pandemic.