



TIA Comments on USTR-2020-0014 on Additional Modifications of the 301 Action to Address COVID-19

The Telecommunications Industry Association (TIA) represents more than 400 global companies that enable high-speed communications networks and accelerate next-generation ICT innovation. Through leadership in U.S. and international advocacy, technology programs and standards development, and business performance solutions, TIA and its members are supporting connectivity across industries and markets as the world responds to the challenges posed by the COVID-19 pandemic.

Overview

Maintaining connectivity is vital to the ongoing medical response to the COVID-19 pandemic, and for this reason TIA requests that USTR remove duties on a select set of information and communications technology (ICT) equipment used to bolster the country's already strained networks.

Telecommunications equipment supports COVID-19 response efforts by:

- Facilitating the maintenance of communications networks used by first responders,
- Supporting operations within and between hospitals and medical centers,
- Enabling the deployment of telehealth applications,
- Supporting remote work, thereby allowing more people to enact social distancing and other prophylactic measures, and
- Facilitating efforts to track disease vectors.

This has already been directly reinforced by U.S. government action, as per the following decisions:

- The DHS Cybersecurity and Infrastructure Security Agency (CISA) has designated the Communications and IT sectors as critical infrastructure that is essential to combating the COVID-19 emergency.
- In the CARES Act, Congress allocated \$200 million to a COVID-19 telehealth program designed to relieve strain on hospitals by transitioning more healthcare services to remote applications.
- Using CARES Act funding, the Federal Communications Commission (FCC) has established a dedicated telehealth program to help health care providers provide connected care services to patients at their homes or at mobile locations. Program funding will be used to provide eligible health care providers support to purchase telecommunications, information services, and connected devices necessary to provide telehealth services to patients.
- FCC actions to increase broadband availability, provide regulatory support to providers of conference calling services, and enable the use of additional spectrum by first responders.

TIA and many of its member companies have supported the U.S. response to the coronavirus pandemic by signing the FCC's Keep America Connected Pledge. Participants in this initiative committed to waive late fees for residential and small business customers, open Wi-Fi hotspots for public use, and to refrain from terminating service to customers during the pandemic. Tariff relief would enable companies to



retain critical talent, sustain robust connectivity during this crisis, more efficiently use federal dollars appropriated by Congress for telehealth purposes, and fuel America's growth into a recovery.

Tariff Codes for ICT equipment:

Tariff relief on the following product categories would support the ongoing medical response to the COVID-19 pandemic. The following products are used by doctors and patients to facilitate telehealth applications and disease tracking, support maintenance of vital telecommunications infrastructure, or are a component used in the manufacture of products used for these purposes:

Products that facilitate telehealth, connectivity, and network maintenance:

- PCs and workstations (8471.49.00, 8471.50.01)
- Modems (8517.62.00.10)
- Networking systems, e.g. switches, routers (8517.62.0020)
- Radio and Infrastructure Parts (8517.70.0000)
- Copper cables (8544.49.30.40, 8544.49.30.80)
- Coaxial, telecommunication, and adaptor-fitted cables (8544.20.00.00, 8544.42.90.90, 8544.49.10.00)

Manufacturing inputs into products that facilitate telehealth, connectivity, and network maintenance:

- Plastic molded parts / components [fiber trays, antenna parts] (3926.90.99)
- Power supply, chargers (8504.40.85.00)
- Nickel-metal hydride batteries (8507.50.00)
- Closed network transceivers (8517.62.00.90)
- Duplexers, Filter Combiners (8517.69.00.00)
- Printed circuit boards (8534.00.00)
- Optical fiber connectors (8536.70.00.00)
- Lasers; fiber cable; optical lasers; multiplexers and demultiplexers (9013.80.90)

We appreciate USTR allowing for public comment regarding possible tariff exclusions. If you have any questions regarding this submission, please reach out to TIA's Director of Global Policy, Patrick Lozada, at plozada@tiaonline.org or at 703-907-7733.