

Before the
**OFFICE OF THE UNITED STATES
TRADE REPRESENTATIVE**
Washington, D.C. 20230

In the Matter of)
Request for Comments on the Design of a) USTR-2026-0034
Plurilateral Agreement on Trade in Critical)
Minerals and Policy Actions to Strengthen)
the Resilience of Critical Mineral Supply)
Chains)

**COMMENTS OF THE
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INTRODUCTION

The Telecommunications Industry Association (“TIA”) appreciates the opportunity to comment regarding the United States Trade Representative (“USTR”)’s request for input on the design of a plurilateral agreement on trade in critical minerals and policy actions to strengthen the resilience of critical mineral supply chains. TIA is a U.S.-based trade association and Standards Developing Organization that represents more than 400 trusted, global manufacturers of telecommunications equipment and services. TIA and its members strongly support the Trump Administration’s goals to place U.S. industry first and guarantee U.S. manufacturing and technological leadership.

TIA and its members support the Administration’s efforts to secure critical minerals supply chains, processed critical minerals products, and the downstream industries that depend on them. These downstream industries include TIA members, which design, produce, market, and manage the information communications technology (“ICT”) equipment and services that connect Americans and our partners around the world, and provide the trusted networks and digital infrastructure on which U.S. artificial intelligence (“AI”) dominance is being built. Ensuring these trusted companies have reliable access to critical minerals and related products is foundational to the United States’ continued technological leadership.

Accordingly, the United States should pursue a plurilateral agreement or agreements that aims to increase domestic availability of both mined and refined critical minerals and processed critical mineral products, including policies to generate sustained, reliable demand for market-based production of these products, provide reasonable price stability and clear demand signals to suppliers, and secure supply chains against single-sourcing and overreliance on adversaries.

I. SECURE, RELIABLE ACCESS TO CRITICAL MINERALS AND RELATED PRODUCTS IS VITAL FOR ICT MANUFACTURERS AND FOUNDATIONAL FOR AMERICAN TECHNOLOGICAL LEADERSHIP

A. ICT Manufacturers Depend on Critical Minerals and Related Products

TIA supports increasing U.S. manufacturing in the ICT sector and our members have already made ambitious investments in support of this goal within the past three years.¹ Critical minerals play an essential role in the ICT supply chain, and secure, reliable access to critical minerals and processed critical mineral products is essential to sustaining and growing U.S. ICT manufacturing. Key critical minerals of concern for TIA members include:

- **Germanium:** This mineral is essential in the production of optical fiber, which various companies in the United States manufacture in significant quantities both for domestic use and for export. Optical fiber underlies all U.S. telecommunications networks, networks that are foundational to U.S. leadership in AI and other advanced technologies. Specifically, Germanium Tetrachloride (GeCl₄) is a key component necessary to produce optical fiber, and it can be purchased directly from foreign sources and used by manufacturers to produce the ultra-pure core at the center of each optical fiber. Alternatively manufacturers may purchase Germanium Dioxide (GeO₂), which they further refine to create GeCl₄.
- **Lithium:** Lithium is used in the manufacture of batteries used to power ICT end-user devices and infrastructure, including in the data centers that serve as AI's nerve centers.
- **Yttrium, Antimony, Gallium, and Indium:** These minerals are used in the manufacture of semiconductors, which constitute the majority of the functional bill of materials for various ICT products.

Many critical minerals require refining to extract, separate, or purify them before they can be used in ICT manufacturing. At present, nearly 90% of critical mineral processing of these minerals is concentrated in the People's Republic of China ("PRC")² due to that nation's

¹¹ See 2023-2024 announcements by [Nokia](#), [Corning](#), [Commscope](#), [AdTran](#), [Infinera](#), [Ciena](#), [DZS](#) and others.

² <https://elements.visualcapitalist.com/all-u-s-critical-minerals-in-2025-ranked-by-supply-disruption-risk/#:~:text=Rare%20earth%20elements%20like%20samarium,new%20app%20from%20Visual%20Capitalist>.

decades-long strategy of state investment, industrial policy, and market protection.³ Some examples of the refining processes required for critical minerals of particular importance to TIA's membership include:

- **Germanium** must undergo significant refining before it can be used in ICT manufacturing due to the extraordinarily high purity needed for applications such as use in fiber-optic systems. The manufacturing of these systems involves adding GeCl₄ to the pure silica glass cores of fiber-optic cables to increase their refractive index; the conversion of unprocessed germanium to GeCl₄ requires purity levels exceeding 99.999%.⁴
- **Lithium** must be refined into a battery-grade product like lithium carbonate (Li₂CO₃) or lithium hydroxide (LiOH) before it can be used in long-lasting, high-performing batteries.⁵
- **Gallium**, like germanium, must undergo purification before it can be used in advanced applications such as semiconductors, high-efficiency power electronics, and display backlighting.⁶
- **Iridium** is recovered secondarily as a by-product of zinc-smelting. It requires additional processing to achieve the purity level necessary for the exceptionally low electrical resistivity and high optical transmittance⁷ needed in touchscreens, liquid crystal display (LCD) screens, and fiber-optics.⁸

All of these processed critical mineral products are vital to the ICT infrastructure, networks, and products on which U.S. leadership in advanced technologies rests, and on which the U.S.' growing dominance in AI is being built. As such, ensuring trusted ICT manufacturers' continued access to them and reducing supply chain reliance on adversary nations such as the PRC are essential to U.S. innovation and economic security. Achieving these objectives requires the adoption of trade policies that will build a resilient and non-

³ <https://forum.rareearthexchanges.com/threads/detailed-timeline-chinas-rare-earth-restrictions-and-strategic-moves.16/>

⁴ <https://www.globalmarketstatistics.com/market-reports/germanium-tetrachloride-for-optical-fibers-market-10517>

⁵ <https://pmc.ncbi.nlm.nih.gov/articles/PMC11080025/>

⁶ <https://www.sfa-oxford.com/rare-earths-and-minor-metals/minor-metals-and-minerals/gallium-market-and-gallium-price-drivers/>

⁷ <https://pubs.acs.org/doi/10.1021/la4033282>

distorted marketplace for critical minerals and develop U.S. and aligned partner critical mineral mining, processing, and recovery capacity.

II. THE U.S. GOVERNMENT SHOULD PURSUE A PLURILATERAL CRITICAL MINERALS AGREEMENT WITH POLICIES INCLUDING PRICE FLOORS, INDUSTRIAL POLICY ALIGNMENT, AND OTHER FORMS OF COOPERATION WITH ALIGNED PARTNERS

The Administration has already taken necessary and important steps to lay the groundwork for increased critical mineral mining, processing, and recovery capacity. These measures have included:

- **Facilitating domestic mining and refining projects.** The Trump Administration has already taken necessary steps in this regard through Executive Order (EO) 14285, “Unleashing America's Offshore Critical Minerals and Resources,” and EO 14241, “Immediate Measures to Increase American Mineral Production.”⁹
- **Deepening efforts to develop and secure long-term access to mineral resources in allied/partner countries.** The Trump Administration has secured a historic agreement with Ukraine to develop and access mineral rights,¹⁰ as well as establishing critical mineral dialogues with partners that have rich deposits including Argentina,¹¹ Australia,¹² and Canada,¹³ and even negotiating mini-trade agreements focused exclusively on minerals.¹⁴
- **Encouraged Recycling of Critical Minerals:** The Trump Administration has initiated multiple policies aimed at accelerating the reclamation of used industrial and consumer devices to provide a new, significant, and reliable source of critical minerals. There is

⁹ Exec. Order No. 14,241, 90 Fed. Reg. 13,673 (Mar. 25, 2025), <https://www.federalregister.gov/documents/2025/03/25/2025-05212/immediate-measures-to-increase-american-mineral-production>.

¹⁰ White House, Fact Sheet, President Donald J. Trump Secures Agreement to Establish United States–Ukraine Reconstruction Investment Fund (May 5, 2025), <https://www.whitehouse.gov/fact-sheets/2025/05/factsheet-president-donald-j-trump-secures-agreement-to-establish-united-states-ukraine-reconstruction-investment-fund/>.

¹¹ U.S. Dep’t of State, Media Note, U.S. and Argentina Sign Memorandum of Understanding to Strengthen Cooperation on Critical Minerals (Aug. 23, 2024), <https://ar.usembassy.gov/us-and-argentina-sign-memorandum-of-understanding-to-strengthen-cooperation-on-critical-minerals/>.

¹² Prime Minister of Austl. & President of the U.S., Joint Statement, Australia–United States Climate, Critical Minerals and Clean Energy Transformation Compact (May 20, 2023), <https://www.pm.gov.au/media/australia-united-states-climate-critical-minerals-and-clean-energy-transformation-compact>.

¹³ Natural Res. Can., News Release, Government of Canada and the United States Co-Invest to Strengthen Critical Mineral Value Chains (May 16, 2024), <https://www.canada.ca/en/natural-resources-canada/news/2024/05/government-of-canada-and-the-united-states-co-invest-to-strengthen-critical-mineral-value-chains.html>.

¹⁴ Office of the U.S. Trade Representative, Press Release, United States and Japan Sign Critical Minerals Agreement (Mar. 28, 2023), <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2023/march/united-states-and-japan-sign-critical-minerals-agreement>.

considerable potential for the U.S. to further develop the capacity to better collect, process, reclaim, and recycle critical minerals from end-of-life products.¹⁵

Any plurilateral trade agreement should take account of these existing important Administration actions, allow them to bear fruit, and expand on them. Additional efforts are especially vital for increasing U.S. and allied processing capacity. Potential new measures in this area could include:

- **Price floor system:** Past U.S. efforts to develop domestic critical mineral processing capacity have been hindered by commodity market price volatility. A price floor mechanism as proposed by the Trump Administration could mitigate this volatility, providing investors predictability, enhancing the financial viability of new projects, mitigating the price impacts of PRC overproduction and other non-market actions, and sending durable policy signals about the priority the U.S. is placing on developing secure, resilient critical mineral supply chains.¹⁶
- **Cooperation and policy alignment with partners:** Nations such as Australia,¹⁷ Japan,¹⁸ South Korea,¹⁹ Canada,²⁰ Brazil,²¹ and Argentina²² have substantial or growing critical mineral processing capacity, although even they currently lag far behind the PRC. The U.S. should seek to deepen cooperation with these partners to provide financing for mid-stream processing capacity building, build secure, reliable supply chains that support U.S. ICT manufacturers and leadership in cutting-edge technologies, and align policy to ensure that plurilateral agreement parties can access relevant U.S. subsidies even if they are not formal free trade agreement (“FTA”) partners.
- **Recovery from waste streams:** The U.S. should incorporate and build on the Trump Administration’s critical mineral recycling and recovery efforts to promote recovery from waste and processing by-product streams among plurilateral agreement parties. Such an approach can reduce U.S. dependency on highly geographically localized supplies of certain critical minerals. Recovery is possible with existing technologies and critical mineral concentrations in waste are often higher than those in primary deposits.²³ Waste and by-product recovery is projected to experience strong growth in the next two decades, and the U.S. can provide tailwinds by pursuing stable, profitable business

¹⁵ Diego Laje, Trash to Treasure: Critical Minerals Recycling, AFCEA Int’l (Apr. 1, 2024), <https://www.afcea.org/signal-media/technology/trash-treasure-critical-minerals-recycling>.

¹⁶ <https://www.thefai.org/posts/to-solve-its-domestic-mineral-paradox-america-may-need-price-floors>

¹⁷ <https://www.csis.org/analysis/unpacking-us-australia-critical-minerals-framework-agreement>

¹⁸ <https://pubs.usgs.gov/fs/2025/3038/fs20253038.pdf>

¹⁹ <https://pubs.usgs.gov/fs/2025/3038/fs20253038.pdf>

²⁰ <https://www.canada.ca/en/campaign/critical-minerals-in-canada/canadas-critical-minerals-strategy/canadas-critical-minerals-strategy-progress-update.html>

²¹ <https://www.argusmedia.com/en/news-and-insights/latest-market-news/2788268-us-aims-to-process-critical-minerals-in-brazil>

²² <https://globaltaiwan.org/2025/12/argentinas-critical-minerals-sector/>

²³ <https://www.idtechex.com/en/research-article/global-trends-in-critical-material-recovery-2025-and-beyond/33811>

models for recyclers across the proposed trade bloc.²⁴

²⁴ <https://www.idtechex.com/en/research-article/global-trends-in-critical-material-recovery-2025-and-beyond/33811>

CONCLUSION

TIA again thanks USTR for its important work on a plurilateral agreement on trade in critical minerals and policy actions to strengthen the resilience of critical mineral supply chains.

TIA welcomes the opportunity to provide continued input from the ICT industry as these agreements and potential policies are reviewed, and looks forward to future critical mineral discussions with USTR.

Respectfully submitted,

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March 19, 2026
