June 3, 2025

The Honorable Howard Lutnick
U.S. Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Subject: Aerospace Industries Association Comments on Section 232 National Security Investigation of Imports of Commercial Aircraft and Jet Engines and Parts of Commercial Aircraft and Jet Engines

Reference: BIS-2025-0027, XRIN 0694-XC127

Dear Secretary Lutnick,

The Aerospace Industries Association (AIA) and ours hundreds of member companies welcome the opportunity to provide comments on the initiation of the Section 232 investigation to determine the effects on national security of imports of commercial aircraft, jet engines, and parts and components thereof.

The shared aerospace and defense (A&D) industry is integral to the U.S. economy with a domestic manufacturing base of over 100,000 companies and 2.2 million American workers.[1] In 2023, the commercial aerospace industry alone generated nearly $545.2 billion in business output and contributed $284.1 billion to the 2023 U.S. gross domestic product.[2]

AIA represents companies across the A&D supply chain, ranging from small suppliers to large original equipment manufacturers (OEMs). For over 100 years, the American civil aviation manufacturing industry has generated job growth, raised wages for American workers, and combatted the trade deficit. No other manufacturing industry holistically aligns with the Trump Administration's vision for a domestic production economy. Our industry creates high-wage manufacturing jobs in all 50 states, is a leader in global exports due to technological innovation, and is vital to U.S. economic and national security.

AIA and our members are eager to continue to demonstrate how our industry to the U.S. economy and support the U.S. government in crafting strong, commonsense policies that bolster domestic manufacturing, drive U.S. exports, and provide for a safe, efficient, and affordable air transportation system on which the American public can rely. Through targeted attention to the manufacturing workforce, industrial standards, and reciprocal trade relationships, America's aviation industry will continue to be the national asset it has been for over a century.

[1] Aerospace Industries Association, 2024 Facts & Figures, 9 September 2024.
[2] Aerospace Industries Association and PwC, Contributions of the Aerospace Industry to the US Economy in 2023, June 2025

American civil aviation manufacturing is a pillar for U.S. global trade leadership

Because of the continued global demand for American-made products, the American A&D industry sells billions of dollars' worth of product overseas every year, combatting the national trade deficit. For over 70 years, the A&D industry has maintained a positive trade surplus—the only manufacturing industry to do so—largely due to the success of the civil aviation sector. In 2023, our industry exported $135.9 billion worth of goods, $113.9 billion of which were civil aviation products. This brought the A&D positive trade surplus to $74.5 billion in 2023, which the industry expects to match in 2024.[3]

Four percent of all U.S. exports in 2023 were A&D goods, making our industry is the leading U.S. manufacturing exporter—and manufacturers and suppliers are operating at full capacity to meet demand. As air travel increases and the global aviation fleet grows, American civil aviation manufacturers are expected to deliver the high-quality, safe, and precise products for which the U.S. is known. To do so, the civil aviation manufacturing industry must sustain a healthy and secure supply chain, productive workforce, and global market access.

Manufactured in America by American workers

Driven by global trade success and the need for safety and precision, the U.S. A&D industry has continued to reinvest into the U.S. manufacturing economy and workforce. Not only is the industry investing in skilled training and apprenticeships, but also the infrastructure and production capacity that sustain these jobs ($2.9 billion and $8.4 billion respectively in 2023).[4] Our industry has remained committed to manufacturing products in America by Americans.

In 2023, the domestic A&D workforce grew 4.8 percent to over 2.2 million employed Americans. Our industry far outpaces the national average for workforce growth of 1.7 percent annually and relies on a highly specialized and skilled workforce as well as American-sourced high-grade materials to develop and manufacture our technology.

Unlike other industries, the civil aviation manufacturing industry prioritizes domestic production of high-value components and final assembly. Advanced aerospace components, including jet engines, flight control systems, and airframes, are primarily produced in the U.S. by high-skilled American workers using cutting-edge manufacturing techniques.

The American aviation industry is built on reciprocity

As a global industry, we have long advocated for a global marketplace that ensures fair competition and market access for American exports and secures the health of the U.S. manufacturing base. In the late 1970s, the American aviation manufacturing industry was threatened by anti-competitive practices led by foreign countries instituting subsidies, tariffs, and non-tariff barriers on American-made products. This, combined with limiting import licenses and imposing export restrictions, constrained the international market access of the U.S. aviation manufacturing industry.

U.S. companies called on the U.S. government to enter negotiations with trading partners to establish global trading standards, harmonize regulations, and remove tariff and non-tariff barriers

[3] Aerospace Industries Association, 2024 Facts & Figures, 9 September 2024.
[4] Aerospace Industries Association and PwC, Contributions of the Aerospace Industry to the US Economy in 2023, June 2025

on the import of civil aircraft, engines, parts and components, and flight simulators. In 1979, AIA testified before Congress, stating that "competent, technologically advanced" foreign competitors, supported by their national governments, placed pressure on the U.S. aerospace industry and would diminish its market share.[5] Understanding the threat, the U.S. government worked with industry to understand its equities, ensure manufacturers' interests were at the center of negotiations, and ultimately developed the *1979 Agreement on Trade in Civil Aircraft.*

The Agreement illustrates how reciprocal trade agreements can lead to sustained growth for U.S. manufacturing. Signatories providing duty-free access to civil aircraft parts and components expanded export opportunities for the U.S. aviation industry and led to the industry being the largest sectoral contributor to the United States' industrial trade balance and only manufacturing industry with a trade surplus. Since 1979, the Agreement has secured global market access for the American commercial aviation industry and allowed it to excel over foreign competitors — growing our economy and creating jobs at the same time. In the 40 years since its implementation, U.S. civil aviation exports grew by over 2,177 percent, and the American A&D workforce has more than doubled.[6] The benefits are difficult to overstate; critically, growth of the commercial aviation industry has allowed America to invest in and maintain a robust and resilient manufacturing industrial base that serves domestic and international customers and also.

American airworthiness as the global manufacturing and product delivery standard

Civil aviation manufacturing demands precise standards to safely and reliably transport passengers. Every part and component in civil aircraft and jet engines must meet strict certification requirements, standards, and regulations for quality, safety, and reliability.

As a further benefit of the reciprocal, robust global trade environment, the United States has cemented safety and regulatory compliance as core tenets in the global aviation market. To be traded on the global market, all aviation articles must be pursuant to airworthiness certificates issued by the Federal Aviation Administration (FAA) or an equivalent international regulatory body that has agreed to recognized airworthiness standards, such as the European Union Aviation Safety Agency (EASA). As a result, the U.S.' high standards for airworthiness ensure the safe and secure transportation for millions of Americans that travel by civil aviation every day.

Safety standards are upheld throughout the supply chain; manufacturers cannot simply change a part, component, or material without validating it to meet the requirements stipulated by its approved design. The industry requires high-purity, aerospace-grade materials that require qualified processing, refining, and smelting operations. Aviation suppliers are subject to stringent criteria and rigorous audits in addition to FAA product certification. Integrating new suppliers and expanding capacity is complex, timely, and costly. It may take up to 10 years to establish a new domestic supplier and ensure they meet necessary, rigorous safety certifications.

Certification is also vital in ensuring continued safety and airworthiness of aircraft and travel after sale. Our members invest heavily in maintenance, repair, and overhaul (MRO) to ensure sustained safety and reliability of aircraft through regular maintenance and inspections. Civil aviation products may be in service for 30 to 50 years, requiring regular MRO over their operational life

[5] United States Senate Committee on Finance, Hearings before the Subcommittee on International Trade on Trade Agreements Act of 1979, July 1979

[6] Aerospace Facts and Figures 1980/1981 and 2019 Facts and Figures, Aerospace Industries Association.

cycle. Any changes to parts and components must be fully validated and certified to ensure safety and performance are not compromised. American aviation has set the standard for regularly scheduled maintenance of civil aircraft and upheld regulatory compliance in the delivery of MRO products and services.

A strategic supply chain to bolster American innovation

American-made civil aviation products are consistently preferred over foreign competitors' products due to our industry's cutting-edge technology and high standards. Our industry invests heavily in research and development (R&D)—$34.5 billion in 2023 alone—and advanced manufacturing capabilities to drive innovation and maintain technological superiority, ensuring we are the global destination for the world's best aircraft, equipment, and technology.[7] As the global leader of civil aviation manufacturing, and as a result of the zero-for-zero trade environment that has existed for 45 years, our industry has made strategic investments in domestic and global suppliers to enhance competitiveness, support collaboration, and access global markets.

The American civil aviation manufacturing industry has thrived due to joint venture investments with trading partners that share similar values. Many top export destinations are also major sources of imports. This reflects the strategic partnerships U.S. aviation manufacturers have made to ensure global market access, maintain competitiveness and acquire technologically advanced capabilities from partner nations as their domestic industries developed. Our industry also relies on a network of both domestic and international suppliers to meet demand and ensure U.S. manufacturers are delivering competitively priced products in the global market. While manufacturing and final assembly is primarily done in the United States, international suppliers help diversify sourcing and mitigate supply chain disruptions. Trusted, certified suppliers from reciprocal trading partners are crucial to ensuring U.S. manufacturing is capable of meeting demand and continues to secure international market access and bolster American civil aviation exports.

A healthy civil aviation industry supports a robust defense industrial base

Unlike other industries, the American civil and defense aerospace industries are intertwined and share a broad range of suppliers across the value chain. Defense companies rely on the health of the commercial market for access to minerals, materials, and products at scale, quality, and cost. The same tooling, workforce, and quality-assurance that serves civil aviation manufacturing underpins the defense industrial base. In order to have a resilient defense industrial base, the United States must have a healthy and secure commercial manufacturing sector.

Dual-use infrastructure is not only cost-effective and productive for R&D and innovation but is also crucial to maintaining the skilled workforce and manufacturing capabilities for defense readiness. Our members are invested in the Administration's efforts to revitalize the defense industrial base and support of the American warfighter. To do so, the U.S. government must consider policies from which the civil aviation and defense industrial base equally benefit to protect supply chain access, ensure price predictability, and access investment opportunities. Thoughtful policymaking will ensure the same inputs and manufacturing policies that serve commercial and defense purposes are safeguarded.

[7] Aerospace Industries Association and PwC, Contributions of the Aerospace Industry to the US Economy in 2023, June 2025

Recommendations:

AIA and our members have long been committed to supporting the U.S. government in strengthening its policies and tools that maintain U.S. export competitiveness, ensure supply chain security, and uphold national security objectives. As President Trump has previously stated, the future of American manufacturing competitiveness depends on reciprocal trade relationships and healthy supply chains.

The U.S. civil aviation manufacturing industry has benefited from a zero-for-zero trade environment for decades. Unlike other sectoral trade agreements, trading partners have not withdrawn from their commitments and have continued to provide U.S. manufacturers global market access free of tariff or non-tariff barriers. This robust environment has led to increased workforce and manufacturing development, technological innovation, and U.S. export leadership.

Our members are eager to support the Administration in developing policies that further protect and bolster U.S. civil aviation manufacturing. Imposing broad tariff or non-tariff trade barriers on the imports of civil aviation technology would risk reversing decades of industrial progress and harm the domestic supply chain. Targeted, industry-government engagement could result in productive investment policies and actions that secure supply chain resiliency and enhance the American manufacturing workforce and capacity.

1. Develop trade policies with domestic manufacturers' interest in mind

The civil aviation manufacturing industry commends the Trump Administration's efforts to ensure U.S. manufacturers are engaged in reciprocal trade by reducing tariff and non-tariff barriers. Our industry understands how trade policies can impact an industry's capacity, productivity, and ability to compete and sell on the global market. Due to our longstanding zero-for-zero trade environment, our industry has exceled and continued to manufacture in the U.S. with a domestic workforce as other domestic manufacturing industries have faced challenges.

AIA and our members are eager to work with the U.S. government to develop trade policies that support our industry and reflect its strong manufacturing capabilities. We are supportive of the Administration pursuing trade agreements that secure market and supplier access. For example, the U.S.-Mexico-Canada Agreement (USMCA) has been pivotal for our industry in providing access to critical mineral and raw material sources that are not domestically available and strengthening the North American supply chain, thereby reducing adversarial dependencies.

Our industry is collaborative by design; we have developed reciprocal trading relationships with trusted partners to meet market demand, ensure mutual safety certification, and establish secure supply chains. A mindful and targeted trade policy that considers these circumstances can further bolster U.S. manufacturing.

Pursue preferential treatment during trade negotiations

AIA members were pleased to see the Trump Administration consider the competitiveness and security of the aerospace supply chain while negotiating the historic trade deal with the United Kingdom. As the U.S. government continues to define the preferential access to high-quality aerospace components, our members encourage the Administration to include these terms and conditions in future negotiations with other trading partners.

The U.S. government should advocate for reciprocal trade of aerospace parts and components between the United States and committed, like-minded trading partners. Additionally, the United States and its trading partners should agree to high-standard mutual commitments in the areas of intellectual property (IP), labor, and environment, as was outlined in the U.S.-U.K. trade deal. Pursuing these terms will ensure the security and health of the aviation supply chain as well as global market access for U.S. exports.

Drive production capacity and delivery through foreign investment access

Our industry has benefited substantially from foreign investment into domestic civil aviation manufacturing through job creation, global market access, and increased innovation through shared R&D. Maintaining foreign investment, particularly through joint ventures, is critical to ensuring the U.S. civil aviation manufacturing industry remains competitive and innovative. These partnerships preserve market access and strengthen our industry's resilience and leadership in global trade.

The Trump Administration has outlined key efforts to create an open investment environment through the *America First Investment Policy.* These efforts can be further supported by streamlining foreign investment through the Committee on Foreign Investment in the United States and facilitating constructive agreements with trading partners that uphold IP protection and support regulatory compliance. The Administration should consider these efforts while pursuing trade negotiations to ensure the U.S. continues to be a safe and attractive investment destination.

Preserve reliable access to suppliers

The civil aviation manufacturing supply chain is dependent on economies of scale. Continued access to suppliers and aerospace-grade raw materials mitigate disruptions to delivery fulfillment. Imposing tariffs may have significant impacts on the sub-tier supply chain through reduced cash flow, limited capital for reinvestment, and disruption of long-term manufacturing planning. This cash flow is critical for sub-tier suppliers especially, who rely on a limited cash flow for their workforce and R&D investment.

Aircraft and parts are already in high demand and have a limited supply, with long lead times between sale and delivery. Maintaining access to our industry's secure supply chain ensures U.S. aviation manufacturers can continue to lead in exports, support American jobs, and combat the trade deficit. Tariffs could create longer lead times and disadvantage suppliers, Tier 1 integrators, and OEMs who export their products abroad by limiting market access due to trade disruption.

Access is also critical to MRO service and delivery. MRO costs have increased 15 percent over the past five years and sustained tariff rates contribute to costs increasing further and limiting supply of MRO products.[8] Tariffs on after-sale parts and components could harm the MRO industry, workforce, and implementation of American-driven safety standards. Our industry is eager to work with the U.S. government to ensure MRO services remain accessible and the American public continues to fly safely.

[8] McKinsey & Company, Aircraft MRO 2.0: The digital revolution, 19 July 2024.

2. Promote a diverse, domestic supply chain by leveraging existing resources

A robust and resilient supply chain is critical to the U.S. civil aviation manufacturing industry, especially as demand for American made products accelerates. Limited access and competition with other sectors to access raw materials and critical minerals is an existing challenge manufacturers face and further constraints on the supply chain may lead to order fulfillment backlog. For example, in February 2025, a fire broke out at the factory of an aerospace fastener and fittings supplier in Pennsylvania. The fire left the factory in ruins and created a supply challenge for the domestic aviation industry because the supplier was the sole source for many upstream aviation manufacturers. As a result, the aviation industry is experiencing delays in order fulfillment because there is not sufficient supply of safety-certified domestic fasteners and fittings.

Our members are eager to integrate new domestic suppliers into the value chain but report transitioning as a primary supply chain challenge. Entering the supply chain may take up to 10 years due to several barriers to entry, including stringent certification requirements, the need for a highly specialized and skilled manufacturing workforce, and demand for upfront and continued capital investment. To address supply chain security and keep the American public flying, the U.S. government should consider targeted actions that bolster manufacturing and reduce barriers to entry.

Streamline certification requirements

The civil aviation manufacturing industry leverages existing tools and strategies to accelerate certification and customer-adoption of airworthy parts and components. Notably, Production Certificates (PC), issued by the FAA, have been crucial in enabling OEM and Tier 1 suppliers to integrate new sources into their supply chain. PC holders reduce supplier certification timeline by eliminating bureaucratic redundancies and accelerating airworthiness approvals.

The U.S. government should strengthen this process by avoiding further certification requirements for suppliers to aviation PC holders that are potentially duplicative and/or could add additional time to an already lengthy certification process. Additionally, agencies like the Department of Transportation (DOT) and FAA should establish clearer guidance and standards for the certification of alternative manufacturing processes to be employed by PC holders. These standards should be streamlined and broad to ensure the safe and sustainable integration of new PC holder suppliers into the industrial base and mitigation of administrative burdens on industry and government agencies.

Support capital investment for new entry suppliers

Access to capital investment remains one of the largest barriers to entry for new domestic suppliers. Without financial support, the domestic supply chain risks losing innovative technology, advanced manufacturing capabilities, and critical R&D.

The U.S. government can support capital investment into the supply chain through existing resources as well as targeted policy development. For example, loans through the Small Business Administration and FAA Center of Excellence support new suppliers in developing their workforce and advanced manufacturing capabilities. The Export-Import Bank Working Capital Guarantees is also crucial in enabling new suppliers to compete in the global market and fulfill

export order commitments. Our members are ready to assist the U.S. government in supporting small businesses and new supply chain entrants by leveraging existing resources and identifying further investment opportunities.

Drive domestic production to ensure access to critical minerals

Our industry relies on critical minerals to support the U.S. national defense objectives and meet global demand for American-made civil aviation products. Our industry is unique compared to other manufacturing sectors (e.g., automotive applications, consumer electronics, etc.) due to our need for high-purity, aerospace-grade materials from qualified processing and refining operations. These complex applications meet stringent strength and durability requirements for performance and safety, but are purchased at smaller quantities from fewer suppliers, leaving our industry with less buying power.

As the United States responds to adversarial threats, commercial travel increases, artificial intelligence and data center development accelerates, demand for American-made commercial aerospace products will increase while supply of processed critical minerals needed for these products remains limited. Given the role of critical minerals in the aerospace supply chain, AIA submitted detailed recommendations in our formal response to the Commerce Department's request for public comments on the Section 232 investigation into imports of processed critical minerals and derivative products. We look forward to working with the U.S. government to implement these and other proposals aimed at securing reliable access and bolstering domestic production of critical minerals.

3. Enable air traffic control modernization through the delivery of innovative technology

The U.S. air traffic control system is at a critical inflection point; recent aviation incidents and outages at major U.S. airports have underscored the urgent need to modernize our nation's aging air traffic control (ATC) infrastructure and technology. This effort is especially important as civil aviation travel is projected to increase significantly over the coming years, alongside the emergence of new airspace users (e.g., unmanned aerial systems and advanced air mobility).

Delivery of technology is critical to modernizing ATC and the national airspace system (NAS). The FAA currently operates two different NAS systems, the older being 30 to 50 years old. To upgrade parts and components, the FAA must keep its own stockpile of spare parts as many manufacturers are no longer in business. Ensuring supply chain resiliency and technology access is not only critical to maintain and modernize NAS operation but also protect the safety and security of American civil air travel and tourism.

Our industry is eager to provide the American public with the ATC service they expect and deserve. AIA and our members welcome the Administration and DOT's commitment to replacing antiquated telecommunications, radar and tower infrastructure, and integrating new technologies into ATC systems. Our ability to support the Administration in meeting this objective will require clear guidance from FAA and DOT and continued market access to meet technological demand.

Provide clear and consistent demand signals to industry

Previous efforts to modernize the NAS and ATC systems have been stalled due to lapses in funding, changing policy directives, and unmet deadlines have challenged industry's ability to

deliver products and systems. Industry needs clear demand signals to continue to invest in its workforce, R&D, and manufacturing. Our members encourage ongoing industry-government engagement with DOT and FAA to ensure ATC modernization objectives have clear expectations, implementation deadlines, and resources to meet demand.

Ensure policies secure market access and the health of the supply chain

To meet modernization objectives, there will be a need for innovative technologies and solutions, including utilizing high-speed fiber optics, wireless and satellite communication systems, and advanced surveillance technologies. The U.S. government should consider how trade policies can support or hinder the implementation of these initiatives. Industry needs continued market access and a secure supply chain to support R&D, procurement, and production of cutting-edge technologies. Barriers to access may lead to production disruptions, including longer lead times, for critical ATC components and increased delivery costs.

4. Stabilize the aviation manufacturing sector through workforce investment

Workforce constraints remain a barrier to aviation industry growth and its ability to meet domestic and international demand for American-made products. A&D companies have dedicated significant resources and efforts to workforce recruitment and retention but continue to face shortages. At the end of 2023, there were 600,000 manufacturing job vacancies.[9]

Talent sourcing and filling job openings poses a challenge for A&D companies due to an aging workforce—nearly a quarter of the workforce is over the age of 55—and competition with other industries. The A&D industry relies on both highly specialized, skilled and, due to the sensitivity of projects, workers often require extensive training and background checks. A&D companies must compete from a limited talent pool of American citizens capable of obtaining security clearances, further underpinning recruitment challenges.

Improving talent sourcing and attrition is best accomplished through public and private investment. A&D manufacturers have taken various actions to bolster recruitment and workforce, including referral bonuses, university and trade school partnerships, expedited training, and new compensation models. These efforts can be further supported through the U.S. government providing policy incentives and budget stability to invest in a skilled domestic workforce. Federally funded apprenticeship programs signal a commitment to the manufacturing industry and workforce development. This, coupled with industry investments, ensures that growth in domestic manufacturing continues and competes with countries already investing in a skilled workforce.

Previous initiatives have proven the success of government support. The Aviation Manufacturing Jobs Protection program was monumental in providing temporary support to eligible aviation manufacturing companies to restore American jobs and boost labor production following the COVID-19 pandemic. The program stabilized the aviation manufacturing sector and mitigated further workforce disruptions to support the nation's economic recovery.

Achieving workforce productivity growth will require significant commitments and effective industry-government engagement. AIA and our members encourage the U.S. government to work closely with industry to identify gaps in workforce retention and attrition and identify what

[9] Agile One, Adapting to Change with a Flexible Workforce: Workforce Solutions Market Overview 2024 Outlook, 2024.

investments and actions can be made to ensure the aviation manufacturing workforce is sustained and meets demand.

5. Ensure U.S. aviation manufacturers continue to innovate and maintain technological superiority

For over 100 years, the American civil aviation manufacturing industry has been synonymous with innovation and delivering cutting-edge technology that connects Americans with the world. It is imperative for U.S. industry to maintain our position as leaders in the advanced, high-value technologies that will determine the health of our sector and the safety of the traveling public for decades to come. To do so, global market access for American companies must be maintained to ensure our systems and platforms remain in high demand and we can deliver ahead of our competitors and at-cost.

The United States must continue to invest in advanced capability technologies that are strategically important for our sector, including new forms of propulsion, advanced manufacturing, and autonomy and artificial intelligence. Public-private investments between industry and government agencies, such as FAA, National Aeronautics and Space Administration (NASA), Department of Defense, and Department of Energy, can ensure that those technologies are developed in the United States and not abroad. AIA and our members were pleased to see the House-passed reconciliation bill revives immediate expensing for R&D and capital equipment purchases, which will incentivize investment and innovation in U.S. aerospace manufacturing.

As our industry develops these technologies, we must ensure there is also a pathway for getting these to market. Alongside accelerating certification of new aircraft products, our industry needs access to the global marketplace. Our industry has maintained its status as the leading exporting sector through both our technological superiority and sustained zero-for-zero trade environment. Disruptions to the trade system could impede U.S. aviation manufacturers' ability to win international contracts, deliver on sales, and compete with other emerging markets.

6. Continue industry and public consultation

Our industry is committed to supporting the U.S. government by providing practical knowledge and expertise to assist in policy development that will support domestic industry and mitigate risks to export competitiveness.

The civil aircraft supply chain is highly complex. As the Department of Commerce continues its investigation, our members encourage the Bureau of Industry and Security (BIS) Office of Strategic Industries and Economic Security to extend the comment period by 90 days and continue to work with industry to assess the short and long-term impact of any tariff and non-tariff actions.

Given our industry's long lead times for sourcing parts and components for both new production and sustainment, our members also recommend a 180-day pause on any tariffs imposed on the aviation industry to ensure U.S. manufacturing continues to meet demand without disruption and conduct necessary safety and maintenance services. If tariffs are imposed, the U.S. government may consider implementing duty drawbacks to allow for the balance of imports and exports to enable the recovery of duties paid on the imported goods. Duty drawbacks align with the Administration's goals to counter the trade deficit and provide financial incentives to U.S.

companies to increase manufacturing through minimizing penalties and created an active trading environment.

Industry engagement is critical in developing effective, commonsense policies. As our industry holds the largest domestic trade surplus, our experts are eager to work with the U.S. government to identify best practices and policies that further investment, uphold national security objectives, and invest in American manufacturing and workers. We recommend BIS engage with industry directly to understand the trends of global commercial aviation trade, the industrial supply chain, and valuation of products that may be covered by any Section 232 tariffs to ensure they accurately reflect national security concerns and do not put the supply chain and aviation safety at risk.

Conclusion

Engagement with U.S. industry at all tiers of the supply chain—from producers to end users—is critical to ensure that measures aimed at increasing access to commercial aviation, jet engines, and parts and components do not impose undue administrative burdens on suppliers or lead to unintended consequences.

AIA and our members are committed to working with the Department of Commerce to ensure the continued dominance of the U.S. civil aviation manufacturing industry. We appreciate the opportunity to provide public comments and look forward to close collaboration on this matter. If you have any questions or require additional information, please contact my staff lead for this matter, Lizzie Patterson (lizzie.patterson@aia-aerospace.org).

Respectfully,

Derek “Dak” Hardwick
Vice President, International Affairs
Aerospace Industries Association