



August 30, 2018

VIA ELECTRONIC FILING

The Honorable Robert E. Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 17th St. NW
Washington, D.C. 20508

Docket No.: USTR-2018-0026

Dear Ambassador Lighthizer:

On behalf of the members of the Bicycle Product Suppliers Association (BPSA), the National Bicycle Dealers Association (NBDA), and the PeopleForBikes Coalition (PeopleForBikes), we write to express our opposition to the proposed 25 percent tariff increase on bicycles and bicycle products imported from China. The BPSA and PeopleForBikes are 501(c)(6) industry associations that represent American manufacturers and suppliers of bicycles, parts, and accessories. The NBDA is a 501(c)(6) industry association that represents specialty bicycle retailers in the United States.

If approved, a 25 percent tariff increase on our products will be extremely damaging to the U.S. bicycle market, and will negatively impact an industry that is contributing \$88 billion to the U.S. economy. Under this proposal, our tariff burden will increase by \$250 million and will require us to raise retail prices by at least 25 percent -- likely more. The tariffs will severely affect customer demand for our goods and ultimately the American jobs that our industry supports.

Our industry acknowledges that the unfair transfer of intellectual property is a serious threat to U.S. businesses. The Section 301 investigation is protecting important American interests in this field. However, our goods are not the types of advanced technology products that are the focus of the Section 301 investigation or China's development plans such as Made in China 2025. Our industry has very few concerns related to the theft of business information as a result of our operations in China. Because our industry lacks a clear nexus to these issues, we do not believe tariffs on our goods will be effective in serving the end goals the Section 301 investigation.

We respectfully ask that you remove the Harmonized Tariff Schedule (HTS) headings that include bicycles and bicycle products from the list of goods proposed for a tariff increase, as they do not relate to the underlying goals of the investigation.

1. Background

a. Section 301 Investigation and Proposed Tariffs

In August of 2017, the United States Trade Representative (USTR) commenced an investigation of China under Section 301 of the Trade Act of 1974. The primary focus of the investigation related to the theft or unfair transfer of technology and intellectual property from U.S. businesses, particularly as it relates to the strategic goals of the Chinese government. These strategic goals are outlined in plans such as “Made in China 2025.”¹

USTR released the results of the investigation in a report and memorandum dated March 22, 2018. This report noted that China’s actions are occurring as it pursues “ambitious technology-related industrial policies” which are “driven in large part by China’s goals of dominating its domestic market and becoming a global leader in a wide range of technologies, especially advanced technologies.”²

The report detailed core areas where China has unfairly engaged in practices to facilitate the transfer of U.S. technology to the Chinese government or Chinese businesses:

- The selective enforcement of its foreign investment restrictions to pressure U.S. companies to release their intellectual property to gain access to particular Chinese markets or industries.
- The abusive use of its approval and licensing process to force U.S. companies to engage in technology transfers in order to win approvals by the Chinese government.
- The arbitrary and ambiguous nature of the requirements needed to win approvals, and how those are leveraged to force technology transfers.
- China’s state-supported outbound investment program.
- The unauthorized intrusion into U.S. commercial computer networks to obtain trade secrets and intellectual property, conducted or supported by the Chinese government.

In response to these findings, on July 11, 2018 USTR proposed a 10 percent tariff increase on \$200 billion worth of Chinese goods. This announcement included most bicycles, parts, components, and accessories. Most importantly, it included all complete bicycles, which are imported under HTS heading 8712.³ On August 1, USTR announced that the tariffs for this \$200 billion tranche of goods could be increased by as much as 25 percent.⁴

¹ Initiation of Section 301 Investigation; Hearing; and Request for Public Comments: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 82 Fed. Reg. 40213 (Aug. 24, 2017).

² OFFICE OF THE UNITED STATES TRADE REPRESENTATIVE, FINDINGS OF THE INVESTIGATION INTO CHINA’S ACTS, POLICIES, AND PRACTICES RELATED TO TECHNOLOGY TRANSFER, INTELLECTUAL PROPERTY, AND INNOVATION UNDER SECTION 301 OF THE TRADE ACT OF 1974 10 (March 22, 2018).

³ Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed. Reg. 33608 (July 17, 2018).

⁴ Extension of Public Comment Period Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed. Reg. 38760 (Aug. 7, 2018).

b. The American Bicycle Industry

Bicycling in the United States generates \$88 billion in annual consumer spending and supports 770,000 domestic jobs. This creates approximately \$6 billion in tax revenue for state and local governments, and an additional \$6 billion in tax revenue for the federal government.⁵ Our goods are sold at 6,500 specialty bicycle retailers in the United States, and tens of thousands of mass market storefronts (i.e., big box retailers).

However, the thrust of our economic contribution to the United States no longer comes from the manufacture of bicycles or components, and has not for many years. Instead, the suppliers in our industry employ engineers, designers, marketing professionals, lawyers, accountants, and sales executives to guide our American brands. Bicycle retailers in America employ thousands of sales staff and mechanics to sell approximately 18 million bicycles annually. Our customers create billions of dollars in economic activity as they ride their bicycles around town, on vacations, and at events, supporting jobs in hospitality, tourism, and transportation.

In the 1990s approximately 9-10 million bicycles were produced domestically each year. There were also bicycle component manufacturing facilities to support the production of complete bicycles. However, China's pending admittance to the World Trade Organization, and new trade relations with the U.S., threatened that business. In 1995, leading brands such as Huffy, Murray, and Roadmaster petitioned the U.S. International Trade Commission (ITC) to impose protective measures on bicycle imports from China in order to preserve our domestic manufacturing base and the jobs in the U.S. bike industry.⁶ While the ITC agreed that China's actions were harming U.S. bicycle manufacturing, no measures were imposed.

In the following decades, our industry adapted to the new realities of global trade. Domestically our industry had no option but to close factories, and we lost thousands of bicycle manufacturing jobs. These job losses occurred at facilities for both complete bicycles and components. Without measures to protect domestic jobs, production shifted to Asia, and particularly to China. The entire supply chain for global bicycle production migrated.

To compete in a global marketplace, we require high-quality, efficient, and affordable sources of production that can create millions of bicycles for the world market. For the last 20 years, China has been the only location to meet those demands. The current manufacturing environment has taken many years to complete and perfect, and it was done in reliance on U.S. trade policies vis-a-vis China.

While the overwhelming majority of bicycles in the U.S. are imported from China, our industry still generates significant returns for the American economy. The availability of affordable bicycles and bicycle accessories lies at the heart of this contribution. Bicycle purchases generate jobs at suppliers, distributors, and retailers. Their acquisition creates demand for service and accessories. Their use generates the travel and tourism that U.S. communities need. The proposed tariffs place all of these aspects of our industry in serious jeopardy.

⁵ PeopleForBikes, *Our Work, For Policymakers*, <https://peopleforbikes.org/our-work/political-work/for-policymakers> (last visited Aug. 29, 2018).

⁶ U.S. International Trade Commission, *Bicycles From China*, Investigation No. 731-TA-731 (May 1995).

2. Bicycles Share No Connection with China’s Technology Priorities or the Section 301 Investigation

The Section 301 investigation is focused on serious issues that affect many American businesses. Our ability to convert human capital into cutting edge products and services has provided the economic engine for America to prosper. Abusive practices by foreign governments that unfairly seize these assets are worth combating, and we respect this administration’s willingness to engage in this fight.

However, the simple truth is that the vast majority of bicycles and bicycle products imported into the United States are decidedly low-technology and low-value from an intellectual property perspective. Our industry and products are very mature. There is little in the way of proprietary knowledge or trade secrets that our businesses could be pressured into divulging through Chinese foreign investment practices, licensing and approval processes, or hacking our computer systems. For example, nearly 97 percent of children’s bicycles imported into the United States are manufactured in China.⁷ These account for the vast majority of bicycle units imported into the U.S. These products contain no technology that we would regard as proprietary or sensitive. In speaking with our company members that maintain manufacturing operations in China, none recounted having encountered any of China’s coercive technology transfer practices that are described in the Section 301 report.

In light of this reality, it is not surprising that bicycle technology is wholly absent from the advanced technology plans outlined by the Chinese government. The MLP, SEI Decision, and Made in China 2025 initiatives do not list any technology sectors that would implicate bicycles, parts, components, or accessories. While we are sensitive to the fact that many U.S. businesses are suffering harm from China’s plans in these fields, we are not aware of any efforts by the Chinese government to make strategic plans that affect our products.

The fact that our members have not experienced the practices investigated in the Section 301 report, and the lack of any connection to China’s technology goals, confirm that tariffs on our industry are unlikely to serve the goals of the investigation. Tariffs on our industry do not confront the core issue that the Section 301 investigation is intended to solve. Bicycles and bicycle products have no connection to China’s strategic goals around technology.

3. It is Unlikely that Bicycle Manufacturing Will or Could Move to the United States

China provides the overwhelming majority of bicycles that are imported into the U.S. This includes nearly 97 percent of children’s and BMX bicycles, and 94 percent of all bicycles.⁸ Approximately 14.4 million bicycles were imported from China under HTS heading 8712 in 2017. The total number of bicycle imports into the United States was 15.3 million.⁹ To talk about bicycle imports into the U.S. and bicycle imports from China into the U.S. is nearly the same conversation.

⁷ Appendix B (Based on 2017 Import Data from U.S. International Trade Commission).

⁸ Appendix B (Based on 2017 Import Data from U.S. International Trade Commission).

⁹ Appendix B (Based on 2017 Import Data from U.S. International Trade Commission).

There is no alternative country in the world that has the manufacturing capability or supply chain to produce this quantity of bicycles and their underlying parts. A supply shift out of China would take years to implement, would likely have a significant adverse effect on quality and product safety, and could still be economically infeasible even taking into account a perpetual 25 percent tariff increase. Our industry simply cannot foresee shifting the supply of this many bicycles to any other country. Any shift in production would also entail considerable cost and capital investments by our industry. Many of the machines used in the production of our components are highly specialized, and in some cases such as tires, cannot even be moved from existing factories. Testing protocols at new facilities that are needed satisfy U.S. Consumer Product Safety Commission regulations would take months or even years to implement. Production changes for our industry are complex and costly.

Even if the assembly of complete bicycles could be shifted, bicycle parts will continue to be made in Chinese factories. A bicycle consists of more than 200 parts, all which are made in specialized facilities. Shifting other parts of the production process, such as assembly, would not cure our underlying need to purchase components from China. It would simply increase the assembly cost.

This is equally true for replacement parts and accessories. Inner tubes imported into the U.S. are overwhelmingly produced in China (69 percent).¹⁰ While bicycle tires are manufactured in a variety of countries, none are made in America and it is extremely difficult to move their production due to the capital intensive nature of these factories and the need to develop them near trees that produce natural rubber. Safety equipment is also predominantly made in China, with approximately 88 percent of athletic safety headgear (which includes bicycle helmets) being imported from China.¹¹ We are not aware of any locations globally that could provide the manufacturing capacity for these goods that China current fulfills.

Today, approximately 500,000 bicycles are made in America. This consists of bicycles produced by custom and high-end framemakers as well as mass market manufacturers that are working to bring production and assembly to the U.S. However, we expect these businesses to suffer serious adverse consequences if the proposed tariffs are approved. These U.S. producers cannot and will not manufacture all of the components needed to construct complete bicycles. Builders must still source components from abroad, which come almost exclusively from Asia, and predominantly from China for mass market bicycles. The proposed tariff will simply increase the cost for parts, forcing price increases.

We do not foresee bicycle manufacturing returning to the United States on a scale that is anywhere near the market demand. Asia is central to our industry's global supply chain. To run efficiently, production locations for individual components must be located near each other to quickly provide the hundreds of parts needed to produce a complete bicycle and deliver it to market. The plants that produce our components are highly specialized and have taken decades to develop. Given this reality, the proposed tariffs will not protect or incentivize the domestic manufacture of bicycles.

¹⁰ Appendix C (Based on 2017 Import Data from U.S. International Trade Commission).

¹¹ Appendix D (Based on 2017 Import Data from U.S. International Trade Commission).

4. A Tariff Increase of 10 or 25 Percent Will Cause Serious Economic Harm to American Consumers and the U.S. Bicycle Industry

For the reasons we have outlined above, we do not expect that a tariff increase on our products will help achieve the objective of sanctioning China for its technology transfer practices. In contrast, these tariffs will cause massive economic harm to our customers and businesses at home. This harm dramatically outweighs any potential benefit that these tariffs might have in serving the interests of the Section 301 investigation, and merits removing bicycle products from the list of goods proposed for a tariff increase.

At a rate of 10 percent, the proposed tariff increase would result in our industry paying more than \$100 million in new tariffs on bicycles and parts alone. At a rate of 25 percent, the tariff increase would raise that figure to \$250 million. This does not take into account the millions of additional dollars we would pay on accessories such as soft goods and helmets that lack a bicycle-specific heading in the HTS.

There is no way for our industry to accommodate this cost without raising prices. The global bicycle industry is extremely competitive and profits depend on very tight margins. Our existing margins are far too narrow for any entity in our supply chain to absorb these costs without passing them along to the customer.

For an industry with very little domestic manufacturing, our tariffs are already quite high. According to USTR, the trade weighted average import duty for non-agricultural goods entering the U.S. is 2 percent.¹² The existing tariff on most complete bicycles is 11 percent. Many of our components face similarly high tariffs such as saddles (8 percent), pedals (8 percent), spokes (10 percent), wheel rims (5 percent) and frames (3.9 percent).

An increase of 10 percent *ad valorem* would make the tariff on complete bicycles 21 percent, while an increase of 25 percent would increase the tariff rate to 36 percent. A tariff of 36 percent would be disastrous for our industry - when combined with state and local sales taxes, nearly half the purchase price of a new bicycle would come in the form of taxes rather than the cost of building and selling the product.

The results of this price increase are easy to predict and will follow the simple laws of supply and demand. More expensive bicycles means fewer bicycles will be sold. Pricier parts and accessories, coupled with fewer bicycles being sold, means far fewer parts and accessories will be purchased. Less service will be demanded and fewer bicycle-related tourism dollars will be generated. The downstream effects of this proposal may be felt by our industry for years as a lost bicycle sale may cost our industry hundreds or thousands of dollars in lost future purchases on our other products.

We particularly fear the effect this tariff will have on specialty bicycle retailers. There are 6,500 of these shops across the country. Most of these operate as small businesses. A price increase and the corresponding deterioration in demand for bicycles, parts, accessories or service could be the deciding line between profitability and failure.

¹² Office of the United States Trade Representative, Industrial Tariffs, <https://ustr.gov/issue-areas/industry-manufacturing/industrial-tariffs> (last visited Aug. 29, 2018).

Finally, we are concerned that our customers will suffer as a result of a tariff increase. For many people, a bicycle is their only method of transportation. A price increase in tires, tubes, chains, and repair costs will be extremely difficult for these purchasers to absorb. An increase of 25 percent in the tariff for helmets and lights also jeopardizes the safety of bike riders. Any action that will make these items less accessible risks reducing the use of these life-saving products. The fact that many states statutorily compel minors to wear bicycle helmets highlights the need to provide these goods at affordable prices. As goods become more expensive, we also fear that bike riders will delay or decline badly needed service and maintenance, further increasing the risk of injury.

The predominant effect of these tariffs will be to hurt the American bicycle business and its customers. Higher prices means fewer products sold, fewer jobs for suppliers and retailers, and fewer Americans engaging in bike riding for tourism, recreation, and transportation. This harm substantially outweighs any possible benefit that a tariff on bicycles and bicycle products might provide to the goals of the Section 301 investigation.

5. Bicycles and Bicycle Products Should be Removed from the List of HTS Headings Proposed for a Tariff Increase

For the foregoing reasons, we respectfully request that USTR remove HTS headings that include bicycles and bicycle products from the list of goods proposed for 10 or 25 percent tariff increase. We have attached a full list of HTS headings that affect bicycle products as Appendix A to this document. When reviewing this request we ask that USTR prioritize the following areas:

1. **Remove HTS headings beginning with 8712.** A 25 percent tariff increase on complete bicycles could be devastating to our industry. With 94 percent of complete bicycles coming from China, these headings account for 80 percent of the financial impact of the proposed tariff increase, and could dramatically increase the cost of complete bicycles for our customers.
2. **Remove HTS headings beginning with 8714.** Customers rely on an affordable supply of parts to maintain their bicycles, and suppliers and retailers need accessible parts to sustain profitable businesses.
3. **Remove HTS headings 6506.10.30 and 6506.10.60.** Higher tariffs on bicycle helmets, quite possibly the most important item of safety equipment for our industry, will not serve the interests of Americans and particularly children.
4. **Remove HTS headings 4011.50.00; 4012.90.30; 4012.90.70; and 4013.20.00.** The production of tires, tubes and related items is extremely difficult due the capital costs of equipment and the need to locate factories near the natural resource - rubber trees - that provide the necessary raw materials.

Thank you for considering the input of the American bicycle industry as you complete the Section 301 investigation. We will be filing separate comments to address questions raised at the hearing, including how these proposed tariffs will interact with other trade policies such as the de minimis duty exemption.

Sincerely,



Adam Micklin
President
Bicycle Product Suppliers Association



Brandee Lepak
Chair
National Bicycle Dealers Association



Tim Blumenthal
President
PeopleForBikes Coalition

Appendix A

Bicycle Products Affected by USTR-2018-0026

Harmonized Tariff Schedule (HTS) Headings - Unique to bicycles and bicycle products

HTS	HTS Description	Bicycle Products Covered
3926.90.96	Cable housing	Plastic covered brake and derailleur cable housing.
4011.50.00	New pneumatic tires, of rubber, of a kind used on bicycles	All bike tires.
4012.90.30	Bicycle rim strips - natural rubber	Rim strips for wheels - natural rubber.
4012.90.70	Bicycle rim strips - not natural rubber	Rim strips for wheel - synthetic rubber.
4013.20.00	Inner tubes, or rubber, of a kind used on bicycles	Bicycle inner tubes, all sizes.
7315.11.00.10	Chains of iron or steel, roller chains, for bicycles	Bicycle chains.
8512.10.20	Electric lighting equipment for bicycles	Bicycle-specific headlights, lights including a generator, mounting systems or power source.
8512.10.40	Electric visual signaling equipment for bicycles	All bicycle-specific taillights and light sets.
8512.90.40	Parts of electric lighting equipment used on bicycles	Bicycle light parts.
8712.00.15	Bicycles, up to 63.5 cm diameter (Kids)	Bicycles with wheels that are less than 26 inches (Kids, BMX, Folding Bikes).
8712.00.25	Bicycles, over 63.5 cm diameter, under 16.3 kg and tires less than 4.13cm	700C bikes with narrow clearance.
8712.00.35	Bicycles, over 63.5 cm diameter, 16.3 kg+ or tires 4.13cm+	Most adult bicycles - 700C bikes with wider clearance, mountain bikes.
8712.00.44	Bicycles, front wheel 55-63.5, rear over 63.5	
8712.00.48	Bicycles, other	
8712.00.50	Cycles, other than bicycles	Unicycles.
8714.91.20	Frames over \$600	Frames valued at more than \$600.
8714.91.30	Frames, other \$600 or less	Frames valued at \$600 or less.
8714.91.50	Steel tubing, cut to length, for frames/forks	Frame tubesets of steel that are cut to length.
8714.91.90	Forks, parts of frames, parts of forks	Forks (suspension and rigid); frame lugs; titanium tubesets.
8714.92.10	Wheel Rims	Rims.
8714.92.50	Wheel Spokes	Spokes.
8714.93.05	Aluminum hubs, hollow, quick release	Aluminum hub with quick release.
8714.93.15	Hubs, 3 speed	Internal three speed hubs.
8714.93.24	Hubs, 2 speed	Internal two speed hubs.

8714.93.28	Hubs, internal, nesoi	Internal hubs that are not two or three speed.
8714.93.35	Hubs, other	Other hubs (track, hubs without quick release, carbon hubs).
8714.93.70	Freewheel sprocket	Multiple speed freewheel sprockets.
8714.94.30	Caliper, Drum, and cantilever brakes	Complete cantilever and caliper brakes. Single speed coaster brakes. Three speed coaster brakes.
8714.94.90	Brakes and parts, nesoi	Cantilever and caliper brake parts including levers, pads, boots, and hoods.
8714.95.00	Saddles	Bicycle seats.
8714.96.10	Pedals and parts	Bicycle pedals and parts.
8714.96.50	Cotterless cranks	Bicycle cranksets.
8714.96.90	Crank gear, nesoi	Cotter pins.
9029.20.20	Bicycle speedometers	Computers that do not have GPS.
9029.90.40	Bicycle speedometer parts	Parts of speedometers that do not have GPS (mounts, etc.).

Harmonized Tariff Schedule (HTS) Headings - Not unique to bicycle products but include them

HTS	HTS Description	Bicycle Products Covered
2710.19.45	Mixture of hydrocarbons from petro oils & bitum. min. or preps. 70%+ by wt. fr. petro. oils, nesoi, n/o 50% any single hydrocarbon.	Mineral brake fluid.
3402.90.50	Surface-active, washing, and cleaning preparations nesoi, put up for retail sale.	Citrus based degreasers and cleaners.
4202.92.15	Travel, sports and similar bags with outer surface of cotton, not of pile or tufted construction.	Assorted bicycle bags designed for handlebars, frame, saddle or rear rack.
4202.92.20	Travel, sports and similar bags with outer surface of vegetable fibers, excl. cotton, not of pile construction.	
4202.92.31	Travel, sports and similar bags with outer surface of MMF textile materials.	
4202.92.33	Travel, sports and similar bags with outer surface of textile materials of paper yarn, silk or cotton.	
4202.92.39	Travel, sports and similar bags with outer surface of textile materials other than MMF, paper yarn, silk, cotton.	
4202.92.45	Travel, sports and similar bags with outer surface of plastic sheeting.	
4202.92.91	Bags, cases and similar containers with outer surface of textile materials, of MMF except jewelry boxes.	
4203.21.80	Gloves, mittens and mitts specially designed for use in sports, nesoi, of leather or of composition leather.	

4602.12.14	Baskets and bags of rattan wickerwork.	Wicker bicycle baskets.
4602.90.00	Basketwork, wickerwork and other articles made directly from plaiting materials or from articles of heading 4601, nesoi; loofah articles.	Plastic bicycle baskets.
5806.32.10	Woven ribbons of man-made fibers, not pile, not cont by wt 5% or more of elastomeric yarn or rubber.	Replacement webbing and straps for bicycle helmets.
6506.10.30	Other headgear, whether or not lined or trimmed: Safety headgear: Of reinforced or laminated plastics, Other: Athletic, recreational and sporting headgear	Plastic bicycle helmets.
6506.10.60	Other headgear, whether or not lined or trimmed: Safety headgear: Other, Other: Athletic, recreational and sporting headgear	Non-plastic bicycle helmets.
6507.00.00	Headbands, linings, covers, hat foundations, hat frames, peaks (visors) and chinstraps, for headgear.	Replacement visors, pads, and liners for bicycle helmets.
6909.19.50	Ceramic Bearings	Ceramic bearings.
7009.10.00	Glass rearview mirrors for vehicles.	Mirrors designed for bicycles.
7318.15.20	Iron or steel, bolts and bolts & their nuts or washers, imported in the same shipment.	Assorted bolts, nuts and washers used on bicycles.
7318.15.60	Iron or steel, screws and bolts, nesoi, having shanks or threads less than 6 mm in diameter.	
7318.15.80	Iron or steel, screws and bolts, nesoi, having shanks or threads 6 mm or more in diameter.	
7318.21.00	Iron or steel, spring washers and other lock washers.	
7318.22.00	Iron or steel, washers (o/than spring washers and other lock washers).	
7326.90.25	Iron or steel, cable or inner wire for caliper and cantilever brakes and casing therefore, whether or not cut to length.	Brake cable.
7326.90.86	Iron or steel, articles, nesoi.	Steel bicycle repair stands, steel bicycle display stands, steel water bottles, steel headtube badges.
7616.10.70	Aluminum, screws, bolts, nuts, screw hooks, washers and similar articles w/shanks, threads, or holes o/6 mm in diameter.	Assorted screws, bolts, and nuts for bicycles, if made of aluminum
7616.10.90	Aluminum, screws, bolts, nuts, screw hooks, washers and similar articles w/shanks, threads or holes 6 mm or less in diameter.	
7616.99.51	Aluminum, articles, nesoi.	Aluminum water bottle cages
8202.10.00	Hand saws, and base metal parts thereof (except blades).	Saws used to cut carbon and metal bicycle components
8202.91.30	Hacksaw blades for working metal.	Sawblades for cutting metal bicycle components.

8202.99.00	Saw blades nesoi, and base metal parts thereof.	Sawblades for cutting carbon fiber bicycle components.
8203.10.30	Files, rasps and similar tools, n/o 11 cm in length.	Assorted files used on bicycles.
8203.10.60	Files, rasps and similar tools, o/11 cm but n/o 17 cm in length.	
8203.10.90	Files, rasps and similar tools, o/17 cm in length.	
8203.20.60	Pliers (including cutting pliers but not slip joint pliers), pincers and similar tools.	Pliers, including bicycle cable and bicycle housing cutting pliers.
8204.11.00	Hand-operated non-adjustable spanners and wrenches, and base metal parts thereof.	Adjustable wrenches designed for bicycle repair.
8204.12.00	Hand-operated adjustable spanners and wrenches, and base metal parts thereof.	Allen and torx wrenches, box wrenches, cone wrenches, spoke wrenches, headset wrenches, bottom bracket wrenches, cassette lockring wrenches.
8204.20.00	Socket wrenches, with or without handles, drives and extensions, and base metal parts thereof.	Bicycle socket wrenches.
8205.10.00	Drilling, threading or tapping tools, and base metal parts thereof.	Assorted headset and bottom bracket tools.
8205.20.30	Hammers and sledge hammers, with heads not over 1.5 kg each, and base metal parts thereof.	Hammers for use on bicycles.
8205.20.60	Hammers and sledge hammers, with heads over 1.5 kg each, and base metal parts thereof.	
8205.40.00	Screwdrivers and base metal parts thereof.	Bicycle screwdrivers.
8205.59.55	Iron or steel handtools (o/than household, o/than caulking guns) nesoi, and base metal parts thereof.	Bicycle chain repair tools.
8205.70.00	Vises, clamps and the like, and base metal parts thereof.	Aluminum repair stands.
8302.30.30	Iron or steel, aluminum or zinc mountings, fittings and similar articles nesoi, suitable for motor vehicles, and base metal parts thereof.	Bicycle car rack components.
8414.20.00	Hand- or foot-operated air pumps	Bicycle air pumps.
8537.10.91	Other boards, panels, consoles, desks, cabinets, etc., equipped with apparatus for electric control, for a voltage not exceeding 1,000, nesoi.	Electric bicycle displays and systems parts.
8708.29.50	Pts. & access. of bodies for mtr. vehicles of headings 8701 to 8705, nesoi.	Complete bicycle racks for automobiles.
8716.40.00	Trailers, not mechanically propelled, other	Bike trailers, including trailers that carry children.
8716.90.50	Trailer, not mechanically propelled other	Bike trailer parts.

Appendix B

U.S. Complete Bicycles Imports From China and Total Imports

All data derived from U.S. International Trade Commission
Database at dataweb.usitc.gov

HTS Heading	HTS Description	2017 China Imports (Units)	2017 Total Imports (Units)	% of Total Imports from China
8712.00.15	Bicycles having both wheels not exceeding 63.5 cm in diameter	9,014,472	9,327,665	96.64%
8712.00.25	Bicycles having both wheels exceeding 63.5 cm in diameter: If weighing less than 16.3 kg complete without accessories and not designed for use with tires having a cross-sectional diameter exceeding 4.13 cm	1,365,518	1,615,431	84.53%
8712.00.35	Bicycles having both wheels exceeding 63.5 cm in diameter: Other	3,754,073	4,048,871	92.72%
8712.00.44	Bicycles having a front wheel exceeding 55 cm but not exceeding 63.5 cm in diameter and a rear wheel exceeding 63.5 cm in diameter, weighing less than 16.3 kg complete without accessories and not designed for use with tires having a cross-sectional diameter exceeding 4.13 cm, valued \$200 or more each	468	3,012	15.54%
8712.00.48	Other bicycles	142,134	157,402	90.30%
8712.00.50	Other cycles	84,978	176,578	48.12%
	Totals:	14,361,643	15,328,959	93.69%

Appendix C

U.S. Bicycle Inner Tubes Imports From China and Total Imports

All data derived from U.S. International Trade Commission
Database at dataweb.usitc.gov

HTS Heading	HTS Description	2017 China Imports (Units)	2017 Total Imports (Units)	% of Total Imports from China
4013.20.00	Inner tubes, of rubber: Of a kind used on bicycles	16,777,603	24,228,160	69.25%

Appendix D

U.S. Athletic, Recreational, and Safety Headgear Imports From China and Total Imports*

All data derived from U.S. International Trade Commission
Database at dataweb.usitc.gov

HTS Heading	HTS Description	2017 China Imports (Units)	2017 Total Imports (Units)	% of Total Imports from China
6506.10.30.45	Safety headgear: Of reinforced or laminated plastics: Athletic, recreational and sporting headgear	5,468,448	6,867,156	79.63%
6506.10.60.45	Safety headgear: Other: Athletic, recreational and sporting headgear	10,568,616	11,387,796	92.81%
	Totals:	16,037,064	18,254,952	87.85%

*Headgear data from the U.S. International Trade Commission is reported in quantities of dozens. Those figures have been converted to individual units.