

## SUPPORTING STATEMENT PART A

### U. S. Department of Commerce

Inclusions to the Section 232 National Security Adjustments to Automobile Parts Imports

OMB Control No. 0625-NEW

#### Justification (Questions and Responses)

**1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

On March 26, 2025, the President issued Proclamation 10908, “Adjusting Imports of Automobiles and Automobile Parts Into the United States,” 90 Fed. Reg. 14705 (April 3, 2025) (Automobile Proclamation), which finds that imports of automobiles and certain automobile parts continue to threaten to impair the national security of the United States and imposes specified tariffs to adjust imports of automobiles and certain automobile parts so that such imports will not threaten to impair national security pursuant to Section 232 of the Trade Expansion Act of 1962 (“Section 232”). Section 232 authorizes the President to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security of the United States so that such imports will not threaten to impair national security. The Automobile Proclamation imposed a 25 percent tariff on certain imports of automobiles, effective April 3, 2025, and certain imports of automobile parts, effective May 3, 2025.

The Automobile Proclamation also required the Secretary of Commerce (Secretary) to establish a process for including additional automobile parts articles within the scope of the tariffs imposed by the President in the Automobile Proclamation. In addition to inclusions made by the Secretary, the process is to provide for including additional automobile parts articles at the request of a domestic producer of an automobile or automobile parts article, or an industry association representing one or more such producers, where the request establishes that imports of additional automobile parts articles have increased in a manner that threatens to impair the national security or otherwise undermines the objectives set forth in Proclamation 9888 (84 Fed. Reg. 23433, May 17, 2019), the Automobile Proclamation, or in any proclamation issued under Section 232 of the Trade Expansion Act of 1962, as amended (Section 232) or any additional information submitted to the President by the Secretary pursuant to those proclamations. When the Secretary receives such a request from a domestic producer or industry association, the Secretary, after consultation with the United States International Trade Commission and U. S. Customs and Border Protection, is to issue a determination regarding whether to include the articles within 60 days of receiving the request. Any additional automobile parts articles that the Secretary has determined to be included within the scope of the tariffs described in the Automobile Proclamation are to be so included on or after 12:01 a.m. eastern daylight time the day after a notice in the *Federal Register* describing the Secretary’s determination. The notice in the *Federal Register* is to be made as soon as practicable but no later than 14 days after the Secretary’s determination.

The International Trade Administration (ITA), in this interim final rule (IFR), establishes the

process for including additional automobile parts articles within the scope of the tariffs imposed by the President in the Automobile Proclamation.

The Automobile Proclamation required that this process be established within 90 days, meaning no later than June 24, 2025. The Secretary of Commerce established the automobile parts articles inclusion process on June 24, 2025, as required by the Automobile Proclamation. ITA is publishing this IFR to inform the public of the establishment of this process. The automotive industry is in a state of rapid development for various technologies, including in the areas of alternative propulsion systems, autonomous driving capabilities, and other advanced technologies. It is important that manufacturers supporting both the commercial vehicle industry and the defense sector have the opportunity to identify new and emerging automotive products with importance for defense applications to be considered under the scope of this action. In addition, there are many automotive products that fall under broad tariff codes that include parts beyond the automotive sector. While the Department made a best estimate of the most important tariff codes to apply to the scope of the 232 action, industry experts may be aware of broad Harmonized Tariff Schedule (HTS) codes that have become increasingly important to automotive uses that were not originally considered under this investigation.

---

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

Domestic producers of automobiles or automobile parts articles, or any industry association representing one or more such producers, may submit automobile parts articles inclusion requests during two-week submission windows that ITA will open four times annually at the beginning of each January, April, July, and October, though the first such window is to open for two weeks on [INSERT DATE OF FILING FOR PUBLIC INSPECTION]. After the first submission window, all two-week submissions will occur on the first of the prescribed months. Submissions of inclusions requests must be submitted in PDF format via email to [AutoInclusions@trade.gov](mailto:AutoInclusions@trade.gov). For the request to be considered valid, the requestor must provide the following in their request:

- Clear identification of the applicant (i.e., producer of an automobile or automobile parts article, or an industry association of such producers);
- A precise description of the automobile parts article that is the subject of the request;
- The eight or ten-digit Harmonized Tariff Schedule of the United States (HTSUS) classification requested to be included in the scope of the tariffs;
- An explanation of why the article is an automobile parts article;
- Pertinent information on the domestic industry affected;

- Statistics on imports and domestic production;
- A description of how and to what extent imports of the article have increased in a manner that threatens to impair the national security or otherwise undermines the objectives set forth in any Section 232 automobiles proclamation or information submitted to the President by the Secretary under those proclamations;
- Any business confidential submissions must also include a non-confidential public version; and
- All information submitted must be limited to 30 pages inclusive of all attachments.

ITA will review the received requests on a rolling basis during the two-week submission window to validate that each received request contain all the required elements and does not exceed the page limitation. In the instance where the requestor does not include all the required elements or otherwise improperly filed the submission, at the discretion of the Under Secretary for International Trade, the requestor will be granted a 48-hour window to submit a proper filing. The use of fixed submission windows will provide predictability to industry and will be the most efficient use of ITA resources given the short timeframes to secure and process public comments and provide recommendations.

---

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden.**

Domestic producers of automobiles or automobile parts articles, or any industry association representing one or more such producers may submit their applications electronically via e-mail to the address listed in the notice.

**The response to this question should be consistent with the information provided in field 13(b)(1) of the OMB 83-I form.**

---

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

There is no duplication of information within the DOC or another government entity. The information collected represents unique client information that is required by Commerce to efficiently and effectively perform the duties assigned to the Secretary by the President in Proclamation 10908.

---

**5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-1), describe any methods used to minimize burden.**

It is expected that all respondents will be major domestic producers of automobiles or automobile parts articles with operations in the United States. Impact on small businesses is likely to be minimal.

---

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

If approval is not granted for use of these documents, this will hinder Commerce's ability to fulfill the directives of the President in Proclamation 10908. This directive is driven by urgent national security concerns, as the President has determined imports of automobiles and automobile parts are a threat to U.S. national security. Timely implementation of this process is critical to addressing this threat.

In Proclamation 10908, the President required the Secretary to establish a process for including additional automobile parts within the scope of the tariffs. This is necessary to ensure that all automobile parts are subject to the scope of the Section 232 remedy if their importation threatens to impair the national security of the United States.

---

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

This collection will be conducted in a manner consistent with OMB guidelines.

---

**8. If applicable, provide a copy and identify the date and page number of the publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

Under OMB's implementing regulations for the Paperwork Reduction Act at 5 CFR 1320.13(a), OMB has authorized emergency processing of this new submission of collection of information without public comment requirements.

---

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Not applicable. Respondents will not receive payments or gifts.

---

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

All responses to this collection of information will be provided confidentiality to the extent allowed by law.

---

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a sensitive nature are asked.

---

**12. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

**A) Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

**B) Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

It is expected that up to 50 respondents from the Private Sector will complete submissions to be considered for automobile parts inclusion submissions in connection with the Proclamation 10908 of March 26, 2025, "Adjusting Imports of Automobiles and Automobile Parts Into the United States." Those submissions are estimated to take each respondent 8 hours to complete, four times per year, resulting in total estimated respondent burden hours of 1,600.

### Estimated Respondent Burden Hours

Information Collection Instrument (i.e., Type of Response)	Type of Respondent / Occupational Title	Number of Respondents (a)	Number of Responses Per Respondent (b)	Total Number of Responses (c) = (a) x (b)	Burden Hours Per Response (d)	Total Burden Hours (e) = (c) x (d)
Automobile Parts Inclusion Submissions	Private Sector	50	4	200	8	1,600
<b>Total</b>						<b>1,600</b>

13. Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.

Respondent Occupation	% of Client Pop.	Median Salary	Hourly Rate	Weighted Avg. Rate
Executive	27%	\$102,690.00	\$49.37	\$13.55
International Business Development	25%	\$52,649.00	\$25.31	\$6.43
Sales	20%	\$24,809.00	\$11.93	\$2.39
Customer Service	9%	\$31,493.00	\$15.14	\$1.33
Government Relations	7%	\$79,168.00	\$38.06	\$2.60
Export Logistics	6%	\$50,612.00	\$24.33	\$1.43
Policy Director	3%	\$78,029.00	\$37.51	\$1.16
External Consultant/Legal Representative	1%	\$78,120.00	\$37.56	\$0.52
In-house Legal Counsel	1%	\$143,307.00	\$68.90	\$0.78
Other	8%	\$59,039.00	\$28.38	\$2.21
Weighted Avg. Hourly Rate				\$30.19
			1,600 hours	\$48,304

---

**14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

It will take ITA staff approximately 2 hours to review and process each Inclusion Submission. The total estimated cost would be approximately \$186,000 per year (200 submissions \* 3 staff at an average GS-14 salary (\$155/hr)<sup>1</sup> \* 2 hours each to review for each submission).

---

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.**

This is a new information collection.

---

**16. For collections of information whose results are planned to be published, outline plans for tabulation and publication.**

Not applicable.

---

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The agency plans to display the expiration date for OMB approval of the information collection on all instruments.

---

**18. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."**

**A. Certification Statement**

The agency is able to certify compliance with all provisions under Item 19 of OMB Form 83-I.

---

<sup>1</sup> This value is based on GS 14 step five employees in the Washington, DC locality area in 2025, and the wage rate is adjusted upward by 100% to account for overhead and benefits.