SUPPORTING STATEMENT PART A
U. S. Department of Commerce
Procedures for Submissions by Certain Steel and Aluminum Producers Committing to New U.S. Steel or Aluminum Production to Obtain Tariff Adjustments Under Proclamation 10984
OMB Control No. 0625-0285

Justification

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 October 17, 2025, the President issued Proclamation 10984 (Adjusting Imports of Medium- and Heavy-Duty Vehicles, Medium- and Heavy-Duty Vehicle Parts, and Buses Into the United States) (90 FR 48451), finding that imports of medium- and heavy-duty vehicles (MHDVs), medium- and heavy-duty vehicle parts (MHDVPs), and buses threaten to impair the national security of the United States, and determining that it is necessary and appropriate to impose specified tariffs to adjust imports of MHDVs, MHDVPs, and buses so that such imports will not threaten to impair national security pursuant to section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. 1862). In addition, Proclamation 10984 acknowledged the close connections and overlap between part suppliers for the automobile industry and for the MHDV industry, and determined that it is necessary and appropriate to conform certain aspects of the tariff system imposed in Proclamation 10908 of March 26, 2025 (Adjusting Imports of Automobiles and Automobile Parts Into the United States) (90 FR 14705), as amended, with the tariff system imposed in Proclamation 10984 for MHDVs, certain MHDVPs, and buses. Finally, the President found it necessary and appropriate to allow modification of tariffs imposed under Proclamation 9704 of March 8, 2018 (Adjusting Imports of Aluminum Into the United States) (83 FR 11619), as amended, and Proclamation 9705 of March 8, 2018 (Adjusting Imports of Steel Into the United States) (83 FR 11625), as amended, based on commitments to increase production of steel or aluminum products that support U.S. production capacity of key products, including U.S. automobiles and MHDVs.

To enhance the supply chain security and domestic production of U.S. MHDVs and automobiles, Proclamation 10984 authorized the Secretary to reduce tariffs owed under Proclamations 9704 and 9705 by up to half the otherwise applicable rate for aluminum or steel producers that operate production facilities in Canada or Mexico and supply U.S. automobile or MHDV manufacturers. Such adjustments are to be limited to quantities of aluminum or steel equal to newly committed U.S. production capacity, as determined by the Secretary.

Proclamation 10984 provides that the adjusted tariff rate under Proclamations 9704 and 9705 may be no less than 25 percent, and that the adjusted tariff rate is only available for imports of aluminum and steel that qualify for preferential tariff treatment under the U.S.-Mexico-Canada Agreement (USMCA) and that were respectively smelted and cast or melted and poured in Canada or Mexico.

Proclamation 10984 directed the Secretary to administer this program in a manner consistent with the need to address the national security threats the President found in Proclamation 9704, Proclamation 9705, Proclamation 9888 of May 17, 2019 (Adjusting Imports of Automobiles and Automobile Parts Into the United States) (84 FR 23433), and Proclamation 10984. The Secretary has determined that it is necessary to establish a process for firms that operate production facilities in Canada and Mexico to apply for the adjusted tariffs, as authorized in Proclamation 10984, based on the quantities of aluminum or steel equal to newly committed U.S. production capacity. The Secretary has determined that only increased commitments to produce primary steel and primary aluminum should be eligible because these commitments address key bottlenecks and will increase the supply of U.S. steel and aluminum for downstream producers of automobiles and MHDVs. For purposes of these procedures, “primary steel” means any semi-finished or finished steel product that was first produced in a liquid state in a steel making furnace and “primary aluminum” means new aluminum metal that is produced from alumina (or aluminum oxide) by the electrolytic Hall-Heroult process.

The Secretary has also determined that, for purposes of these procedures, commitments to increase production capacity of primary steel and primary aluminum that supports U.S. production capacity of key products is limited to commitments to increase capacity of primary steel and primary aluminum that supports U.S. production capacity for automobiles, MHDVs, automobile parts, and MHDV parts (MHDVPs). Proclamation 10984 identifies automobiles and MHDVs as examples of key products. As automobile parts and MHDVPs are critical inputs to MHDVs and automobiles, and as much of the steel and aluminum contained in automobiles and MHDVs is first incorporated into automobile parts and MHDVPs, the Secretary determined that automobile parts and MHDVPs are also “key products” under these procedures, consistent with the purpose of Proclamation 10984.

The Federal Register Notice, *Procedures for Submissions by Certain Steel and Aluminum Producers Committing to New U.S. Steel or Aluminum Production to Obtain Tariff Adjustments Under Proclamation 10984***,** and its instrument established procedures for submission and review of such documentation by the Department of Commerce (Department). This directive is driven by national security concerns, as the President has determined imports of automobiles, auto parts, medium- and heavy-duty vehicles, and medium-and heavy-duty vehicle parts threaten U.S. national security. The process outlined in the Federal Register Notice supports the domestic automobile and medium- and heavy-duty vehicle industry by incentivizing an increase in upstream steel and aluminum production. Steel and aluminum are critical inputs for the automotive and truck ecosystem, and the President has separately recognized that U.S. production of steel and aluminum is vital for U.S. national security.

This is a request for an extension without changes of a currently approved information collection.

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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.

Qualified Companies making Qualifying Commitments may submit documentation, on a project-by-project basis, outlining their proposed investment plan, including the proposed location, production details, proposed capacity, and milestone commitments.

Each submission should include documentation certified by an applicant’s Chief Financial Officer, General Counsel, or an equivalent-level of senior officer that provides the following:

1. An explanation of the applicant’s status as a Qualifying Company, including locations, volumes, and product types of existing production of primary steel or aluminum in Canada or Mexico, and U.S. automobile and MHDV manufacturers to whom the applicant directly or indirectly supplies primary steel or primary aluminum and the volumes supplied.
2. An overview of the proposed project, including project background information, project objectives, proposed location(s) of the project, any progress to date, and an explanation of

the applicant’s engagement with local authorities on the project, including economic incentives and permitting.

3. Details about the proposed production that will occur as a result of the project, including:
   a. Details on the kind of primary steel and/or primary aluminum that will be produced at the facility, including the applicable North American Industry Classification System (NAICS) code, the Harmonized Tariff Schedule of the United States (HTSUS) code that would apply to the product if it were imported into the United States, and a written description of the steel or aluminum product;
   b. The U.S. key product(s) (automobiles, automobile parts, MHDVs, and MHDV parts) production capacity that will be supported, directly or indirectly, by the production resulting from the project;
   c. The projected annual primary steel or primary aluminum production capacity that will result from the project;
   d. A list of suppliers (or potential suppliers) for production equipment for the project, including contracts that have been entered into and quotes or estimates that have been provided by potential suppliers;
   e. A list of construction contractors (or potential contractors) that will be involved in executing the project, including contracts that have been entered into and quotes or estimates that have been provided by potential suppliers;
   f. A list of raw materials that will be needed to support production under the project, including known or expected suppliers and any contracts that have been entered into and quotes or estimates that have been provided by potential suppliers; and
   g. A narrative explanation of how the applicant will increase hiring to staff the new project.
4. Milestones that the applicant commits to meeting in order to obtain and retain a tariff adjustment and the company’s expectation regarding anticipated completion of the project.
   a. Applicants are required to provide targets for the following mandatory milestones:
      i. Purchase of land;
      ii. Completion of facility design;
      iii. Hiring construction team or construction contractors;

    iv. Construction start date;
    v. Purchase of equipment;
    vi. Delivery and installation of equipment; and
    vii. Completion of construction and production first heat.

  b. Applicants may also provide targets for additional, optional milestones, including:
    i. Award of significant construction contract(s);
    ii. Award of significant engineering contract(s);
    iii. Permitting application submission;
    iv. Permitting award;
    v. Finalizing financing agreements;
    vi. Hiring engineers; and
    vii. Equipment certification.

5. A project management plan that details how the applicant will hire and manage the team(s) in charge of key aspects of the project, including engineering, equipment supply, and other relevant activities necessary to complete the project. This plan shall include the estimated cost of construction, engineering, and equipment necessary for the proposed project, as well as any other significant costs the applicant expects to incur as part of completing the proposed project.
6. A commitment to provide the Department with quarterly reports that detail the applicant's progress towards the milestones and project management plan, as well as details on the costs-to-date incurred by the applicant in executing the project. The applicant will use this quarterly report to notify the Department of any proposed changes to the milestones.
7. A statement that the applicant recognizes that substantially meeting the milestones set forth in its submission is necessary for continued eligibility for the tariff adjustment and that, if it does not substantially meet its Qualifying Commitments, the liquidation or reliquidation of entries with the imposition of outstanding tariffs on prior entries that used the tariff adjustment may result. Tariff adjustments may be paused by the Department on a quarterly basis should the Department determine that the applicant is not substantially meeting milestones. Moreover, failure to provide requested information and significant delays that are within the applicant's control and that threaten a project's timely

completion may result in a determination by the Department that the applicant has failed to substantially meet its Qualifying Commitment, resulting in termination of eligibility and a requirement that the Qualifying Company take all necessary action to pay duties that would otherwise have been owed on previous entries of Qualifying Imports. The applicant is required to provide information requested by the Department and to provide the Department with access to information needed to verify the accuracy of the application and to ensure compliance with Qualifying Commitments. Failure to do so may be treated as a failure to substantially meet Qualifying Commitments, and may result in the Department directing CBP to reliquidate entries at the duty rate that would apply without any tariff adjustment.

8. The name and importer of record number of the importer responsible for importing steel or aluminum into the United States under the tariff adjustment on behalf of the applicant. The applicant may only designate a single representative.

The Department will review each submission for completeness, commercial practicalities (i.e., whether it is a bona fide and facially legitimate proposal), and compliance with these procedures. The Department may request supplemental documentation or clarification as necessary.

Upon a determination by the Department that a submission is complete, is commercially practicable, and is consistent with these procedures, the Department will notify U.S. Customs and Border Protection (CBP) of its determinations, the effective date that tariff adjustments will begin, and of the quantity of Qualifying Imports that is eligible for the tariff adjustment each quarter. The Department will provide CBP with the importer authorized by the Department to access this adjustment, including importer name and importer of record number. Once the Department notifies CBP that a Qualified Company is eligible for a tariff adjustment, the Qualified Company may through its designated importer of record begin importing Qualifying Imports subject to an additional tariff of 25% under Proclamation 9704, as amended, or Proclamation 9705, as amended, subject to the quarterly quantitative limit established by the Department.

As outlined in number 6 above, the applicant shall provide the Department with updates on a quarterly basis for each project, including whether milestones have been met. The Department may, at its discretion, request access to supporting documentation including the applicant's relevant books and records to ensure compliance and evaluate progress towards milestones.

If any developments impact or are reasonably expected to impact the Qualified Company's ability to meet milestones, the Qualified Company must promptly inform the Department in the quarterly report outlined above.

Once a Qualified Company's application is approved and the Qualified Company begins to enter Qualified Imports eligible for tariff adjustments, the Qualified Company must provide the following information to the Department on a quarterly basis:

1. For steel:
    a. A letter, certified by the Qualified Company's Chief Financial Officer, General Counsel, or an equivalent-level of senior officer, summarizing the total shipments, volume, and value of Qualified Imports entered during the quarter and the location of the facilities producing the Qualified Imports claiming tariff adjustment.
    b. An Excel spreadsheet and/or certified .pdf with detailed information on all shipments of Qualified Imports claiming tariff adjustment. Each listed shipment of Qualified Imports should include the country of origin, volume, value, HTSUS classification, and entry number with accompanying mill test certificates which state the country and facility of melt and pour and for each listed heat number.
2. For aluminum:
    a. A letter, certified by the Qualified Company's Chief Financial Officer, General Counsel, or an equivalent-level of senior officer, summarizing the total shipments, volume, and value of Qualified Imports entered during the quarter and the location of the facilities producing the Qualified Imports.
    b. An Excel spreadsheet and certified .pdf with detailed information on all shipments of Qualified Imports claiming tariff adjustment. Each listed shipment of Qualified Imports should include the country and facility of smelt, the country and facility of most recent cast, the country of origin, the value and volume of the article of aluminum, products, HTSUS classification, and a customs entry number for the import.

Qualified Companies must provide this information to the Department on a quarterly basis. A failure to provide the information in this Section will be considered a failure to substantially meet the milestones.

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.

Manufacturers 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.

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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.

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

It is expected that all respondents will be steel and aluminum manufacturers with operations in Canada and Mexico who are involved in the automotive supply chain (e.g. by supplying steel and aluminum to automobile and medium- and heavy-duty vehicle producers). None of these companies are known to be small businesses.

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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 10984. This directive is driven by national security concerns, as the President has determined imports of automobiles, auto parts, medium- and heavy-duty vehicles, and medium- and heavy-duty vehicle parts threaten U.S. national security. The process outlined in the Federal Register Notice, *Procedures for Submissions by Certain Steel and Aluminum Producers Committing to New U.S. Steel or Aluminum Production* *to Obtain Tariff Adjustments Under Proclamation 10984***,** supports the domestic automobile and medium- and heavy-duty vehicle industry by incentivizing an increase in upstream steel and aluminum production. Steel and aluminum are critical inputs for the automotive and truck ecosystem, and the President has separately recognized that U.S. production of steel and aluminum is vital for U.S. national security. Timely implementation of this process is critical to addressing this threat.

Furthermore, the tariff adjustments introduced in this Proclamation are intended to benefit U.S. automobile manufacturers by supporting their supply chains consistent with the Proclamation's goals, which include efforts to " strengthen supply chains; bolster industrial resilience; create high-quality jobs that will expand the skilled workforce in the United States; and increase domestic capacity utilization and United States-produced market share for MHDVs, certain MHDVPs, and buses."

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.

A Federal Register Notice soliciting public comment was published on June 18, 2026 (Volume 91, Number 117, page 36803). No comments were generated from this announcement.

The Bureau is actively evaluating effective approaches for consulting with industry stakeholders and plans to incorporate appropriate respondent engagement into future renewal efforts. Given the program's recent approval in April 2026, the Bureau is still exploring suitable methods and opportunities for stakeholder engagement.

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.

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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.

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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 15 respondents from the Private Sector will complete submissions to be considered for automobile and MHDV parts tariff adjustment treatment in connection with Proclamation 10984. Those submissions are estimated to take each respondent 60 hours to complete, four times a year, resulting in total estimated respondent burden hours of 3,600.

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)
Tariff Adjustments Under Proclamation 10984	Private Sector	15	4	60	60	3,600
Total						**3,600**

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
			X 3,600 hours	$108,684

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 20 hours to review and process each submission. The total estimated cost would be approximately $558,000 per year (60 submissions * 3 staff at an average GS-14 salary ($155/hr)[1] * 20 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.

[1] 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.

There have been no changes to the information collection since the last OMB approval.

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

The results will not be published.

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.