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Delivery via Email to: julie.al-saadawi@trade.gov

Julie Al-Saadawi
Director, Industrial Monitoring and Analysis Unit
International Trade Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, DC 20230

RE: Response to Request for Comments on Aluminum Import Monitoring and Analysis System (91 FR 27913 and OMB Control Number 0625-0279)

Dear Ms. Al-Saadawi,

On behalf of the Aluminum Association and its members, this letter responds to the U.S. Department of Commerce's International Trade Administration's recent notice requesting comments on the Aluminum Import Monitoring and Analysis ("AIM") system.¹ The Association welcomes the opportunity to submit comments on AIM, a program that our Association and its members have actively supported and from which the aluminum industry derives significant benefits in identifying trends in trade flows and addressing aluminum misclassification, transshipment, and evasion of duties.

Further, the Association is grateful for the efforts of numerous Commerce Department officials to organize, launch, and operate the AIM program over the last six years, and the Association and its members work actively to maintain bipartisan support on Capitol Hill for this vital program.

¹ See Agency Information Collection Activities; Submission to the Office of Management and Budget (OMB) for Review and Approval; Comment Request; Aluminum Import Licenses, 91 Fed. Reg. 27,913 (Dep't Commerce May 15, 2026) (hereinafter "Request for Comments").

Phone Number

+1 703-358-2960

Office

1400 Crystal Dr.
Suite 430
Arlington, VA 22202

Email

policy@aluminum.org

The Request for Comments invited public comments on four aspects of the AIM program, each of which is addressed below.

I. Whether the Proposed Information Collection Has Practical Utility

The Department's continued operation and administration of the AIM program have tremendous utility to the Aluminum Association, its members, and the broader domestic aluminum industry overall. The information collected through the AIM program and published by the Commerce Department enhances the ability to monitor the volume of aluminum and aluminum products entering the United States in advance of the release of official U.S. import statistics by the Census Bureau and also includes vitally important additional information not otherwise available in the Census Bureau data concerning the imported products, including among others the countries of most recent smelt and cast. The Association and its members have relied on this information to monitor imports of aluminum products that are covered by antidumping and countervailing duty orders to help ensure that unscrupulous foreign producers and exporters are not circumventing or evading the orders. Overall, the AIM program provides the Association and its members with access to information that cannot be obtained from any other source and, thus, is of unmatched value and utility.

II. Accuracy of Estimated Time and Cost Burden Associated with Completing Import Licenses

The Association has reviewed the Department's estimate of the number of respondents that annually submit licenses required under the AIM program (i.e., 4,000 respondents), as well as the estimated time associated with completing a license (i.e. 10 minutes), and believe the estimates are reasonable. Further, as discussed above in Section I, given the important information that is collected and published by the Department in connection with the AIM program, the modest burden associated with completing and submitting licenses is well-justified – and the benefits associated with the AIM program far surpass the limited time and expenses incurred by the entities that are responsible for submitting licenses.

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III. Ways to Enhance the Quality, Utility, and Clarity of the Information to be Collected

The Association has several suggestions responsive to this inquiry:

- **Expand the Scope of Products Covered by the AIM System to Include All Aluminum-Intensive Derivative Products**

Subsequent to the initial imposition of Section 232 tariffs on imports of aluminum and aluminum products in March 2018, the scope of products subject to the imposition of the tariffs has been expanded to include downstream, so-called “derivative products” that incorporate aluminum. The President recently issued a proclamation strengthening the actions taken to adjust imports of aluminum into the United States that threaten the national security. That proclamation ([here](#)) provides for the imposition of derivative product tariffs on products that are composed entirely or almost entirely of aluminum (products listed in Annex I-A), as well as products that are composed substantially – but not entirely – of aluminum (products listed in Annex I-B). Given the aluminum-intensive nature of these derivative products, the volume of these products imported into the United States, and the importance of a robust and healthy aluminum industry to the national security, the Association urges that the Aluminum Import Monitoring and Analysis (“AIM”) system be expanded to track imports of all imported products that are subject to Section 232 derivative product tariffs. Such an expansion in scope is appropriate and justified, given the important role of the AIM system in serving as an early warning mechanism to help spot trends and shifts in trade flows that might warrant industry or government action. Additionally, the Association would welcome the opportunity to work with Commerce Department officials in developing and implementing such an expansion.

- **Enable Users to Sort AIM Data by 10-Digit Subheading Under the Harmonized Tariff – Schedule of the United States**

The various data that are available and displayed via the AIM programs are extremely helpful in monitoring and analyzing imports of aluminum and aluminum products entering the United States. In order to further facilitate the use and

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manipulation of the data made available through the various pages on the AIM website, the Association urges the Department to modify the functionality of the website to allow users to select options to view data on the basis of 10-digit HTS codes (rather than by product categories based on six-digit codes). Such modifications will provide greater functionality to the data that are already published via the AIM program and will facilitate more nuanced analysis by those using the available data.

IV. Actions to Minimize the Reporting Burden Associated with Completing Licenses

The Association has no further suggestions at this time on actions the Department could take to minimize the reporting burden associated with completing and submitting licenses in connection with the importation into the United States of aluminum and aluminum products.

The Association appreciates the Commerce Department's consideration of these comments and look forward to continuing to interact with agency officials in the future in connection with this vitally important program. Please do not hesitate to contact the Association with any questions regarding this submission using the contact information found in the footer of this document.

Sincerely,

The Aluminum Association

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Office

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