



THE USMCA AUTOMOTIVE RULES OF ORIGIN MOTOR VEHICLE PRODUCER QUESTIONNAIRE

U.S. INTERNATIONAL TRADE COMMISSION

USMCAAutoROO@usitc.gov

You are receiving this questionnaire because the U.S. International Trade Commission (Commission or USITC) has identified your firm as a motor vehicle producer in the United States (see “motor vehicle production” in the Definitions/Glossary, which begins on page 6). Your responses in this questionnaire will be treated as confidential and will be used only if we can ensure the anonymity of your business information.

The information requested by this questionnaire is for use by the Commission in the report it is required to prepare under section 202A(g)(2) of the United States-Mexico-Canada Agreement Implementation Act (19 U.S.C. § 4532(g)(2)) (the Act). The Act requires the Commission to prepare a series of five reports on the economic impact of the automotive rules of origin (ROOs) in the United States-Mexico-Canada Agreement (USMCA), and to provide those reports to the President, the House Ways and Means Committee, and the Senate Finance Committee. The first two reports were delivered in 2023 and 2025. The Act also requires the Commission to “solicit information relating to matters that will be addressed in the report.” Therefore, the Commission is conducting a survey of U.S. motor vehicle producers for the 2027 report.

Answers to this questionnaire will provide information about U.S. motor vehicle producers that will assist the Commission in preparing its report in Investigation No. 332-608, *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2027 Report*. You can learn more about this investigation at the following website: <http://www.usitc.gov/USMCAAutoROO>.

Your firm is required by law to respond to this questionnaire.

Please read all instructions and submit your response
to the web-based questionnaire no later than xxx.

The Commission is requesting this information under the authority of section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)). Failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

For more information on this questionnaire, contact the project team at
USMCAAutoROO@usitc.gov.

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Confidentiality

The Commission has designated the information you provide in response to this questionnaire as “confidential business information,” unless such information is otherwise available to the public. The Commission may aggregate the information you provide with information from other questionnaire responses. The Commission will not publish information obtained from your questionnaire response or an aggregation of your and other questionnaire responses in a manner that would identify your firm or reveal the operations of your firm. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information which it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information.

Instructions

1. **Accessing and completing the questionnaire.** To provide your firm's response to this questionnaire, use the secure interactive website version, accessible at this link:

USMCAAutoROO@usitc.gov

To view the full questionnaire, a PDF version is available at this link: xx.

We sent your firm a notification letter that includes a website link and a 10-digit questionnaire token. Type the website link in an internet browser and access the questionnaire for online completion using your 10-digit questionnaire token. If you have issues with your token or accessing the questionnaire, please email USMCAAutoROO@usitc.gov for assistance.

2. **Entering information.** Answer each question that applies to your firm. Some questions require you to answer by using the provided checkboxes; others require you to type a response into entry areas. You will have an opportunity to review your responses, edit them, and download a copy before submitting.
3. **Entering numeric data.** Enter data for revenue/sales, employees, etc. in actual units, not in thousands, millions, or other multiples of units. For example, for \$123.4 million, enter "123400000," not "123400" or "123.4." (Do not add commas between digits; they will appear automatically after you enter the numbers.)
4. **Questionnaire structure.** This questionnaire is composed of six sections. First, read and respond to section 1 questions carefully. Your responses in section 1 will determine whether you must complete every section that follows.
5. **Submitting the questionnaire.** After you have completed all applicable sections, you may download a copy before submitting. Select the "submit" button to send your final response.

How to report information about your firm

1. **Coordinating your firm's response.** Only one questionnaire per firm may be submitted. If individuals or departments within your firm share the responsibility for completing this questionnaire, please coordinate and combine their responses. This minimizes our need to contact your firm for clarification.
2. **Relationship to corporate structure.** Provide a single response for your firm's activities and experiences and, to the extent possible, the experiences of its subsidiaries and affiliates.

If your firm is a holding company without operations, please contact the project team at USMCAAutoROO@usitc.gov for further instructions.

For U.S. affiliates of foreign companies, please respond as if the affiliate were an independent firm operating in the United States. For example, for an affiliate in the United States, report estimated total U.S. and North American costs for the affiliate and not for the foreign parent company.

Definitions/Glossary

advanced battery—a battery of a kind used as the primary source for the generation of electric power for electrically powered vehicles. Components include cells, modules/arrays, and assembled packs, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

axle—a drive-axle with differential, whether or not provided with other transmission components, and non-driving axles. Components include axle shafts, axle housings, axle hubs, carriers, and differentials, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

body and chassis—major stampings that form the “body in white” or chassis frame. Components include major body panels, secondary panels, structural panels, and frames, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

complementary part—a motor vehicle part that is subject to USMCA automotive ROOs (e.g., small electric motor, headlight, and wiring set) that is not a core part or principal part. The Harmonized Commodity Description and Coding System (HS) 2012 subheadings and descriptions for complementary parts are included in the USMCA, Appendix to Annex 4-B, table C, “Complementary Parts for Passenger Vehicles and Light Trucks,” and table E, “Complementary Parts for Heavy Trucks,” are:

HS 2012 subheading (passenger vehicles and light trucks)	Description
4009.12	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, not reinforced or otherwise combined with other materials, with fittings
4009.22	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined only with metal, with fittings
4009.32	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined only with textile materials, with fittings
4009.42	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined with other materials, with fittings
8301.20	Locks of a kind used for motor vehicles
Ex 8421.39	Catalytic converters
8481.20	Valves for oleohydraulic or pneumatic transmissions
8481.30 Check	Check (nonreturn) valves
8481.80	Other taps, cocks, valves and similar appliances, including pressure-reducing valves and thermostatically controlled valves
8501.10	Electric motors of an output not exceeding 37.5 W
8501.20	Universal AC/DC motors of an output exceeding 37.5 W 8501.31 Other DC motors and generators of an output not exceeding 750 W
Ex 8507.20	Other lead-acid batteries of a kind used for the propulsion of motor vehicles of Chapter 87
Ex 8507.30	Nickel-cadmium batteries of a kind used for the propulsion of motor vehicles of Chapter 87

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Ex 8507.40	Nickel-iron batteries of a kind used for the propulsion of motor vehicles of Chapter 87
Ex 8507.80	Other batteries of a kind used for the propulsion of motor vehicles of Chapter 87
8511.30	Distributors; ignition coils
8512.20	Other lighting or visual signalling equipment
8512.40	Windshield wipers, defrosters and demisters
Ex 8519.81	Cassette decks 8536.50 Other electrical switches, for a voltage not exceeding 1,000 V
Ex 8536.90	Junction boxes
8539.10	Sealed beam lamp units
8539.21	Tungsten halogen filament lamp
8544.30	Ignition wiring sets and other wiring sets of a kind used in motor vehicles
9031.80	Other measuring and checking instruments, appliances & machines
9032.89	Other automatic regulating or controlling instruments and apparatus

Note: "Ex" denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

HS 2012 subheading (heavy trucks)	Description
8413.50	Other reciprocating positive displacement pumps
Ex 8479.89	Electronic brake systems, including ABS and ESC systems
8482.10	Ball bearings
8482.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.40	Needle roller bearings
8482.50	Other cylindrical roller bearings
8483.20	Bearing housings, incorporating ball or roller bearings
8483.30	Bearing housings, not incorporating ball or roller bearings; plain shaft bearings
8483.60	Clutches and shaft couplings (including universal joints)
8505.20	Electro-magnetic couplings, clutches and brakes
8505.90	Other electro-magnets; electro-magnetic or permanent magnet chucks, clamps and similar holding devices; electro-magnetic lifting heads; including parts

Note: "Ex" denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

core part—an engine, transmission, body and chassis, axle, suspension system, steering system, or advanced battery for passenger vehicles and light trucks, according to the USMCA, Appendix to Annex 4-B, table A.2, "Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix." No list of core parts for heavy trucks exists. The HS 2012 subheadings and descriptions for core parts for passenger vehicle and light trucks are included in the USMCA, Appendix to Annex 4-B, table A.1, "Core Parts for Passenger Vehicles and Light Trucks," are:

HS 2012 subheading	Description
8407.31	Reciprocating piston engines of a kind used for the propulsion of passenger vehicles of Chapter 87, of a cylinder capacity not exceeding 50 cc
8407.32	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 50 cc but not exceeding 250 cc
8407.33	Reciprocating piston engines of a kind used for the propulsion of vehicles of

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	Chapter 87, of a cylinder capacity exceeding 250 cc but not exceeding 1,000 cc
8407.34	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 1,000 cc
Ex 8408.20	Compression-ignition internal combustion piston engines of a kind used for the propulsion of vehicles of subheading 8704.21 or 8704.31
8409.91	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, suitable for use solely or principally with spark-ignition internal combustion piston engines
8409.99	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, other
8507.60	Lithium-ion batteries
8706.00	Chassis fitted with engines, for the motor vehicles of heading 8703 or subheading 8704.21 or 8704.31
8707.10	Bodies for the vehicles of heading 8703
8707.90	Bodies for the vehicles of subheading 8704.21 or 8704.31
Ex 8708.29	Body stampings
8708.40	Gear boxes and parts thereof
8708.50	Drive axles with differential, whether or not provided with other transmission components, and non-driving axles; parts thereof
8708.80	Suspension systems and parts thereof (including shock absorbers)
8708.94	Steering wheels, steering columns, and steering boxes; parts thereof
Ex 8708.99	Chassis frames

Note: "Ex" denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

e-axle (electric axle)—a drive unit that combines an electric motor with the transmission and various other automotive specific components, for the purpose of propelling a vehicle that uses an electric motor as the main power source.

electric motor—a motor that is used in electric vehicles, and powers from a battery pack to drive the vehicle's wheels. The electric motor replaces an internal combustion piston engine in a battery electric vehicle, and works alongside the engine in a hybrid vehicle

engine—spark-ignition reciprocating or rotary internal combustion piston engine and compression-ignition internal combustion engine (diesel or semi-diesel engine). Components include heads, blocks, crankshafts, crankcases, pistons, rods, and head subassemblies, according to the USMCA, Appendix to Annex 4-B, table A.2, "Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix."

entry into force—the date that the USMCA took effect: July 1, 2020.

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heavy truck—a motor vehicle of HS 2012 subheadings [8701.20](#), [8704.22](#), [8704.23](#), [8704.32](#), [8704.90](#), or heading [8706](#),¹ except for a motor vehicle that is solely or principally for off-road use.²

ingot—a block of relatively pure metal.

International Emergency Economic Powers Act (IEEPA) tariffs— the series of tariffs that were enacted under the authority of the International Emergency Economic Powers Act (“IEEPA”) between February 2025 and February 2026.³ On February 20, 2026, the U.S. Supreme Court ruled that IEEPA does not authorize the President to impose tariffs.⁴

labor value content (LVC)—the share of the value of a motor vehicle or motor vehicle production that is composed of qualifying labor and other qualifying expenditures, expressed as a percentage. Qualifying labor and LVC requirements in the USMCA automotive ROOs are found in the USMCA, Appendix to Annex 4-B, “Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, Article 7.”

light truck—a motor vehicle of subheading [8704.21](#) or [8704.31](#), except for a motor vehicle that is solely or principally for off-road use.

model line—a group of motor vehicles having the same platform or model name.

¹ USMCA rules were written using HS 2012 nomenclature. Heavy trucks under USMCA are those that would have been classified under the listed codes using that nomenclature, even though in many cases those codes have changed (e.g., 8701.20 in HS 2012 was replaced in HS 2022 with 8701.21-8701.29). To check how HS 2012 codes correspond to HS 2022 codes, see https://hstracker.wto.org/?inputs_&sidebarCollapsed=false&page=%22visualizer%22; USMCA, Appendix to Annex 4-B, Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, 4-B-1-1. As defined in the USMCA, a good of heading 8706, for the purposes of this definition, means a chassis fitted with engines for a motor vehicle under subheadings 8701.20, 8704.22, 8704.23, 8704.32, and 8704.90, except for a motor vehicle that is solely or principally designed for off-road use.

² Related to the explanation in footnote 1, HS subheading 8704.90 (other trucks) had six new subheadings (8704.41, 8704.42, 8704.43, 8704.51, 8704.52, and 8704.60) broken out from it as of the 2022 HS revisions. Products classified under any of these subheadings follow the product-specific ROOs for subheading 8704.90 and are thus also classified as heavy trucks under the USMCA.

³ Effective February 4, 2025, all goods from China became subject to an additional 10 percent tariffs under IEEPA. 90 Fed. Reg. 9121, (February 7, 2025); 90 Fed. Reg. 11426, (March 6, 2025); 90 Fed. Reg. 11463, March 7, 2025; 90 Fed. Reg. 50725, November (7, 2025). Effective March 4, 2025, imports from Canada and Mexico of many upstream products were subject to 25 percent tariffs under IEEPA. Tariffs of these imports from Canada increased to 35 percent on August 1, 2025. Effective March 7, 2025, goods entering the United States duty free under USMCA were not subject to these tariffs. 90 Fed. Reg. 9113 (February 7, 2025); 90 Fed. Reg. 9117 (February 7, 2025); 90 Fed. Reg. 9183 (February 10, 2025); 90 Fed. Reg. 9185 (February 10, 2025); 90 Fed. Reg. 11785 (March 11, 2025); 90 Fed. Reg. 11787 (March 11, 2025); 90 Fed. Reg. 37957 (August 6, 2025). Effective April 5, 2025, many upstream products that may be automotive inputs from certain countries are subject to an additional 10 percent ad valorem duty as part of tariffs initiated under IEEPA. 90 Fed. Reg. 15041 (April 7, 2025); 90 Fed. Reg. 37963 (August 6, 2025).

⁴ *Learning Res., Inc. v. Trump*, Nos. 24-1287, 25-250, 2026 LX 93123 (Feb. 20, 2026); 91 FR 9437, February 25, 2026.

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motor vehicle—a passenger vehicle, light truck, or heavy truck (on-road vehicles from subheadings [8701.10](#) through [8701.90](#),⁵ [8702.10](#), [8702.90](#), [8703.21](#) through [8703.90](#), [8704.10](#), [8704.21](#), [8704.22](#), [8704.23](#), [8704.31](#), [8704.32](#), [8704.90](#), or heading [8705](#) or [8706](#)).⁶

motor vehicle assembly—the process of combining separate constituent parts into a finished motor vehicle, usually along an assembly line.

motor vehicle production—the manufacturing and assembly of motor vehicles.

non-originating good or non-originating material—a good or material that does not qualify for duty-free treatment under the USMCA.

nontraditional motor vehicle input—an input that is historically not uniquely associated with motor vehicles, such as advanced semiconductors, sensors, cameras, and touch screens, but is still frequently part of the finished motor vehicle.

overhead cost—a cost that generally does not increase with the number of vehicles produced; also referred to as a fixed cost.

originating good or originating material—a good or material that qualifies as originating under the USMCA.

passenger vehicle—a motor vehicle of any subheading from [8703.21](#) through [8703.90](#).

party—Canada, Mexico, or the United States.

platform—a consolidated group of components and systems shared across multiple models (e.g., powertrain, underbody, seat structure, thermal system, etc.).

principal part—a significant motor vehicle part not included in core parts, including such parts as air conditioners, seats, air bags, and major components of core parts (e.g., transmission shafts, electronic brake systems, and clutches). The HS 2012 subheadings and descriptions for principal parts are included in the USMCA, Appendix to Annex 4-B, table B, “Principal Parts for Passenger Vehicles and Light Trucks,” and table D, “Principal Parts for Heavy Trucks,” and are:

HS 2012 subheading (passenger vehicles and light trucks)	Description
8413.30	Fuel, lubricating or cooling medium pumps for internal combustion piston engines
8413.50	Other reciprocating positive displacement pumps
8414.59	Other fans

⁵ Related to the explanation in footnote 2, HS subheading 8701.90 (other tractors) was split up into five new subheadings (8701.91, 8701.92, 8701.93, 8701.94, and 8701.95) as of the 2017 HS revisions. Products classified under any of these subheadings follow the product-specific ROOs for HS subheading 8701.90.

⁶ Related to the explanation in footnote 1, a good of HS heading 8706, for the purposes of this definition, means a chassis fitted with engines for a motor vehicle under HS subheading 8701.20, 8704.22, 8704.23, 8704.32, or 8704.90, except for a motor vehicle that is solely or principally designed for off-road use.

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HS 2012 subheading (passenger vehicles and light trucks)	Description
8414.80	Other air or gas pumps, compressors and fans
8415.20	Air conditioning machines, comprising a motor-driven fan and elements for changing the temperature and humidity, including those machines in which humidity cannot be separately regulated, of a kind used for persons, in motor vehicles
Ex 8479.89	Electronic brake systems, including ABS and ESC systems
8482.10	Ball bearings
8484.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.40	Needle roller bearings
8482.50	Other cylindrical roller bearings
8482.80	Other ball or roller bearings, including combined ball/roller bearings
8483.10	Transmission shafts (including cam shafts and crank shafts) and cranks
8483.20	Bearing housings, incorporating ball or roller bearings
8483.30	Bearing housings, not incorporating ball or roller bearings; plain shaft bearings
8483.40	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements presented separately; ball or roller screws; gear boxes and other speed changers, including torque converters
8483.50	Flywheels and pulleys, including pulley blocks
8483.60	Clutches and shaft couplings (including universal joints)
8501.32	Other DC motors and generators of an output exceeding 750W but not exceeding 75 kW
8501.33	Other DC motors and generators of an output exceeding 75 kW but not exceeding 375 kW
8505.20	Electro-magnetic couplings, clutches and brakes
8505.90	Other electro-magnets; electro-magnetic or permanent magnet chucks, clamps and similar holding devices; electro-magnetic lifting heads; including parts
8511.40	Starter motors and dual purpose starter-generators of a kind used for spark ignition or compression-ignition internal combustion engines
8511.50	Other generators
8511.80	Other electrical ignition or starting equipment of a kind used for spark-ignition or compression-ignition internal combustion engines
Ex 8511.90	Parts of electrical ignition or starting equipment of a kind used for spark-ignition or compression-ignition internal combustion engines
8537.10	Electric controls for a voltage not exceeding 1,000 V
8708.10	Bumpers and parts thereof
8708.21	Safety seat belts
Ex 8708.29	Other parts and accessories of bodies (including cabs) of motor vehicles (excluding body stampings)
8708.30	Brakes and servo-brakes; parts thereof
8708.70	Road wheels and parts and accessories thereof
8708.91	Radiators and parts thereof
8708.92	Silencers (mufflers) and exhaust pipes; parts thereof

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HS 2012 subheading (passenger vehicles and light trucks)	Description
8708.93	Clutches and parts thereof
8708.95	Safety airbags with inflator system; parts thereof
8708.99	Other parts and accessories of motor vehicles of headings 8701 to 8705 (excluding chassis frames)
9401.20	Seats of a kind used for motor vehicles

Note: "Ex" denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

HS 2012 subheading (heavy trucks)	Description
8407.31	Reciprocating piston engines of a kind used for the propulsion of passenger vehicles of Chapter 87, of a cylinder capacity not exceeding 50 cc
8407.32	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 50 cc but not exceeding 250 cc
8407.33	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 250 cc but not exceeding 1,000 cc
8407.34	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 1,000 cc
8408.20	Compression-ignition internal combustion piston engines of a kind used for the propulsion of vehicles of Chapter 87
8409.91	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, suitable for use solely or principally with spark-ignition internal combustion piston engines
8409.99	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, other
8413.30	Fuel, lubricating or cooling medium pumps for internal combustion piston engines
Ex 8414.59	Turbochargers and superchargers
8414.80	Other air or gas pumps, compressors and fans
8415.20	Air conditioning machines, comprising a motor-driven fan and elements for changing the temperature and humidity, including those machines in which humidity cannot be separately regulated, of a kind used for persons, in motor vehicles
8483.10	Transmission shafts (including cam shafts and crank shafts) and cranks
8483.40	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements presented separately; ball or roller screws; gear boxes

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HS 2012 subheading (heavy trucks)	Description
	and other speed changers, including torque converters
8483.50	Flywheels and pulleys, including pulley blocks
Ex 8501.32	Other DC motors and generators of an output exceeding 750W but not exceeding 75 kW, of a kind used for the propulsion of motor vehicles of Chapter 87
8511.40	Starter motors and dual purpose starter-generators of a kind used for spark ignition or compression-ignition internal combustion engines
8511.50	Other generators
8537.10	Electric controls for a voltage not exceeding 1,000 V
8706.00	Chassis fitted with engines, for the motor vehicles of heading 8701 through 8705
8707.90	Bodies for the vehicles of heading 8701, 8702, 8704 or 8705
8708.10	Bumpers and parts thereof
8708.21	Safety seat belts
8708.29	Other parts and accessories of bodies (including cabs) of motor vehicles
8708.30	Brakes and servo-brakes; parts thereof
8708.40	Gear boxes and parts thereof
8708.50	Drive axles with differential, whether or not provided with other transmission components, and non-driving axles; and parts thereof
8708.70	Road wheels and parts and accessories thereof
8708.80	Suspension systems and parts thereof (including shock absorbers)
8708.91	Radiators and parts thereof
8708.92	Silencers (mufflers) and exhaust pipes; parts thereof
8708.93	Clutches and parts thereof
8708.94	Steering wheels, steering columns and steering boxes; parts thereof
8708.95	Safety airbags with inflator system; parts thereof
8708.99	Other parts and accessories of motor vehicles of headings 8701 to 8705
9401.20	Seats of a kind used for motor vehicles

Note: "Ex" denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

production motor vehicle—a mass-produced motor vehicle that is offered for sale to the public.

regional value content (RVC)—the share of the motor vehicle value based on its transaction value or net cost that is made up of originating material, expressed as a percentage. RVC requirements in the USMCA automotive ROOs are found in the USMCA, Appendix to Annex 4-B, Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, Articles 3, 4, and 10.

rules of origin (ROOs)—the USMCA automotive ROOs as defined in 19 C.F.R. Appendix A to part 182; USMCA, Appendix to Annex 4-B, 4-B-1-1 through 4-B-1-47.

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Section 232 tariffs on light vehicles and parts— the additional duty applied to U.S. imports of light vehicles and certain light vehicle parts enacted under section 232 of the Trade expansion Act of 1962, as amended.⁷

Section 232 tariffs on medium and heavy-duty vehicles and parts— the additional duty applied to U.S. imports of medium and heavy duty trucks and certain medium- and heavy-duty truck parts enacted under section 232 of the Trade Expansion act of 1962, as amended.⁸

steering system—the system that controls the movement of a motor vehicle along its vertical axis. Components tracked for the USMCA include steering columns, steering gear/racks, and control units, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

suspension system—the system that connects a motor vehicle to its wheels, allowing for relative motion between the two. Components tracked for the USMCA include shock absorbers, struts, control arms, sway bars, knuckles, coil springs, and leaf springs, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

tariff classification—the determination of which subheading or statistical reporting number a specific good is provided for in the *Harmonized Commodity Description and Coding System (HS)* or *Harmonized Tariff Schedule of the United States (HTS)*.

territory of a party—as defined in USMCA Chapter 1, Section C, “Country-Specific Definitions”:

- (a). for Canada,
 - i. the land territory, air space, internal waters, and territorial sea of Canada,
 - ii. the exclusive economic zone of Canada, and
 - iii. the continental shelf of Canada, as determined by its domestic law and consistent with international law;
- (b). for Mexico,
 - i. the land territory, including the states of the Federation and Mexico City,
 - ii. the air space, and
 - iii. the internal waters, territorial sea, and any areas beyond the territorial seas of Mexico within which Mexico may exercise sovereign rights and jurisdiction, as determined by its domestic law, consistent with the *United Nations Convention on the Law of the Sea*, done at Montego Bay on December 10, 1982; and
- (c). for the United States,

⁷ Effective April 3, 2025, U.S. light vehicles and parts imports from most countries are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended. There are lower tariffs for imports that qualify for duty-free treatment under USMCA, and imports from Japan, EU member countries, South Korea, and the United Kingdom. 90 Fed. Reg. 14705 (April 3, 2025).

⁸ Effective November 1, 2025, U.S. medium and heavy-duty truck imports from most countries are subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended, while buses are subject to a 10 percent tariff. There are lower tariffs for imports that qualify for duty-free treatment under USMCA, and imports from Japan, EU member countries, South Korea, and the United Kingdom. 90 Fed. Reg. 48451 (October 22, 2025).

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- i. the customs territory of the United States, which includes the 50 states, the District of Columbia, and Puerto Rico,
- ii. the foreign trade zones located in the United States and Puerto Rico, and
- iii. the territorial sea and air space of the United States and any area beyond the territorial sea within which, in accordance with the customary international law as reflected in the *United Nations Convention on the Law of the Sea*, the United States may exercise sovereign rights or jurisdiction.

transmission—a gear box. Components include transmission cases, torque converters, torque converter housings, gears and gear blanks, clutches, and valve body assemblies, according to the USMCA, Appendix to Annex 4-B, table A.2, “Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix.”

USMCA—the United States-Mexico-Canada Agreement.

variable cost of production—a cost that changes depending on the number of vehicles produced.

SECTION 1. Firm Information

Enter the 10-digit questionnaire token that was in the notification letter we sent to your firm. This will allow the project team to track your response. If you do not know this token, contact the project team at USMCAAutoROO@usitc.gov.

Questionnaire token: _____

- 1.1 Enter your firm's U.S. headquarters address and the name of a person we may contact if we have any questions regarding your response.

Business name			
Address			
City	State	Zip code	Website address
Contact person's name		Contact person's job title	
Contact person's telephone number		Contact person's email	

- 1.2 List your firm's number of full-time equivalent (FTE) employees, including nonproduction workers and contractors, at manufacturing and assembly facilities in the United States for 2024 and 2025.

	2024	2025
FTE employees		

- 1.3

- a. Does your firm produce motor vehicles in North America?
- ☐ Yes
- ☐ No
- b. [If yes to 1.3a] In which countries does your firm produce motor vehicles (select all that apply)?
- ☐ Canada
- ☐ Mexico
- ☐ United States

- 1.4

- a. [If yes to 1.3a] Provide the list of subsidiaries or affiliates that will be included in your firm's responses.

Subsidiary or Affiliate Name	Country

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1.5

- a. [If yes to 1.3a] Are there any model lines of motor vehicles that your firm produced in North America that qualified for duty-free treatment under the USMCA between July 1, 2020, and July 1, 2026?
- ☐ Yes
 - ☐ No
- b. [If no to 1.5a] If no, please explain: _____

1.6

- a. Are there any model lines of motor vehicles that your firm plans to produce in North America (but does not yet) for which it will attempt to qualify for duty-free treatment under the USMCA?
- ☐ Yes
 - ☐ No
- b. Please explain: _____

1.7

- a. [If no to 1.5a and 1.6a] Since July 1, 2024, has your firm made any changes to its North American supply chain in an attempt to qualify for duty-free treatment under the USMCA?
- ☐ Yes, and did qualify
 - ☐ Yes, but did not qualify
 - ☐ No
- b. Please explain: _____

[If 'no' to 1.3a and 'no' to 1.5a, 1.6a, and 1.7a, skip to section 5.]

SECTION 2. Sourcing Decisions and Changes

This section asks about decisions and changes made to motor vehicle assembly and motor vehicle parts sourcing and the extent to which the USMCA automotive ROOs led to the change. For each question below, to the extent possible, describe the impact of changes by model line of motor vehicle. Only include changes that have already been made, and do not include planned future changes.

Some of the questions in Section 2 request information back to 2018, while others request information only back to 2024. Questions requesting information back to 2018 will be prepopulated with information from your firm's responses to the Commission's *2024 USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*. For these questions, please fill in any missing information, as this questionnaire collects additional detailed information that was not collected in the previous questionnaire. A copy of your firm's responses to the Commission's *2024 USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire* is available upon request, if needed.

2.1 Effects of USMCA automotive ROOs on continuing supply chains and production in North America

This section asks about the impact of USMCA automotive ROOs on existing assembly locations and supply chains from July 1, 2024, to July 1, 2026. The questions below are for model lines of motor vehicles that were sold in the North American market beginning before the USMCA entered into force on July 1, 2020. Effects of the ROOs on new model lines that were introduced after July 1, 2020, should be included in section 2.3.

2.1.1

- a. Between July 1, 2024, and July 1, 2026, were any assembly relocation decisions made in which the USMCA automotive ROOs led your firm to continue assembly in North America instead of moving assembly outside of North America?
 - ☐ Yes
 - ☐ No
- b. [If "Yes" to 2.1.1a] List and describe, in the table below, the assembly relocation decisions made between July 1, 2024, and July 1, 2026, in which the USMCA automotive ROOs led your firm to continue assembly in North America. For each assembly relocation decision: briefly describe the decision; briefly explain the purpose of that decision; specify the impacted model line of motor vehicle; select whether the decision was fully or partially ("full" or "partial") attributed to the ROOs; indicate whether the decision was attributed to the regional value content (RVC), the labor value content (LVC), or both; and list any non-USMCA factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the assembly relocation decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the assembly relocation decision was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the assembly relocation decision (e.g., firm would have shifted assembly relocation from United States to South Korea)	Provide a brief explanation for the assembly relocation decision	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs [dropdown: full, partial]	Indicate if the assembly relocation decision is attributable to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing change

2.1.2

- a. Between July 1, 2024, and July 1, 2026, were any sourcing decisions made in which the USMCA automotive ROOs contributed to your firm deciding to continue sourcing motor vehicle core parts or materials from a plant or supplier located in North America instead of switching to a non-North American supplier?
 - ☐ Yes
 - ☐ No
- b. [If “Yes” to 2.1.2a] List the sourcing decisions, in the table below, between July 1, 2024, and July 1, 2026, in which the USMCA automotive ROOs led your firm to continue sourcing core parts or materials from North America. Provide a brief explanation: describe the sourcing decision; briefly explain the purpose of that decision; choose the core part or material that was impacted, specify the impacted model line of the motor vehicle; select whether the decision was fully or partially (“full” or “partial”) attributed to the ROOs; indicate whether the decision was attributed to the RVC, the LVC, or both; and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing decision (e.g., firm would have shifted sourcing of aluminum from United States to South Korea)	Provide a brief explanation for the sourcing decision	Core part or material impacted [dropdown: engine, transmission, body and chassis, axle, suspension system, steering system, advanced battery, steel, aluminum]	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs [dropdown: full, partial]	Indicate if assembly location decision is attributable to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 5] List any non-ROOs factors contributing to the sourcing change

2.2 Changes to motor vehicle assembly and parts sourcing for existing model lines

This section asks about changes made to motor vehicle assembly and motor vehicle parts sourcing to meet the USMCA automotive ROOs.⁹ The questions below are for model lines of motor vehicles that were sold in the North American market beginning before the USMCA entered into force on July 1, 2020. Effects of the ROOs on new model lines that were introduced after July 1, 2020, should be included in section 2.3.

Some questions in this section request information back to 2018, while others request information only since July 2024. Questions requesting information back to 2018 will be prepopulated with information from your firm's responses to the Commission's *2024 USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*. For these questions, please fill in any missing information, as this questionnaire collects additional details that were not collected in the previous questionnaire. The goal is to collect information about all changes to motor vehicle assembly, and parts, steel, and aluminum sourcing since the USMCA entered into force. If you have any sourcing changes that occurred prior to July 1, 2024, that were not reported in your 2024 questionnaire, you will be asked to report them in questions below as well.

The intent of this section is to collect vehicle-specific information about changes made to motor vehicle assembly, and parts, steel, and aluminum sourcing. Only include sourcing changes:

- made to meet the USMCA automotive ROOs (not a complete list of all sourcing changes);
- of the listed core part (not components of the core part); and

⁹ The later questions in section 2.2 are divided into nine subsections which ask about the seven core parts under the USMCA, as well as steel and aluminum purchases. For more information on any of the core parts, see USMCA, Appendix to Annex 4-B, table A.1, "Core Parts for Passenger Vehicles and Light Trucks."

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- that resulted in a shift in the source location to, from, or within North America (Canada, Mexico, and the United States).

2.2.1

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, which includes assembly changes from January 1, 2018, to July 1, 2024. If the assembly relocation was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to assembly relocation.

Note: Full attribution to the ROOs is appropriate if the assembly relocation was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the assembly relocation was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Describe the assembly relocation (e.g., from city, state, country to city, state, country)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs [dropdown: full, partial]	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the assembly relocation can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of assembly (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, but editable}

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[If no data were reported in the firm's 2024 questionnaire response] Your firm did not report any assembly relocations in its 2024 questionnaire response.

- b. Since July 1, 2024, has your firm **relocated assembly** of a model line of motor vehicle to North America (either from outside North America or between North American countries) to meet the USMCA automotive ROOs? An assembly relocation may be a relocation of an entire factory, or a partial shift in output from one factory to another. If any assembly changes from 2018 to July 1, 2024, were not reported in question 2.2.1a, please select "Yes" and provide detailed information about those relocated assembly locations as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No

- c. [If "Yes" to 2.2.1b] List and describe the assembly relocations that occurred since July 1, 2024, in which the USMCA automotive ROOs led your firm to relocate assembly in the table below.

Note: Full attribution to the ROOs is appropriate if the assembly relocation was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the assembly relocation was made in part to meet the ROOs, in addition to influences from other factors.

Describe the assembly relocation (e.g., from city, state, country to city, state, country)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs [dropdown: full, partial]	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the assembly relocation [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the assembly relocation can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If "Yes" to 2.2.1b] For each assembly relocation attributed to the USMCA automotive ROOs, provide a brief explanation, the month and year of the assembly relocation, and a percentage of the model line impacted by the assembly relocation.

Describe the assembly relocation (e.g., from city, state, country to city, state, country)	Model line of motor vehicle impacted	Provide a brief explanation for the assembly relocation	Month and year of the assembly relocation	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent

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state, country to city, state, country)			relocation	vehicle impacted	of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.1b] For each assembly relocation attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs due to assembly relocation. For assembly relocations impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with relocated assembly. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the assembly relocation	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of assembly (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Engines

2.2.2

- a. [If data reported in the firm’s 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission’s *2024 USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **engine** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm’s change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Describe the sourcing change (e.g., shifted	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown	[If 'partial' from column 3] If partial, what is the level	Indicate if the sourcing change can be attributed	[If 'partial' from column 3] List any non-ROOs factors	Change in per-motor vehicle variable costs of productio	Change in total overhead costs (in dollars, use minus
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sourcing of engines from South Korea to United States)		n: full, partial))	of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	contributing to the sourcing change	n (in dollars, use minus sign for a decrease in costs)	sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, but editable}

[If no data were reported in 2024 questionnaire] Your firm did not report any **engine** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **engine** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for engines from 2018 to July 1, 2024, were not reported in question 2.2.2a, please select "Yes" and provide detailed information about those engine sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.2b] List and describe the **engine** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

Describe the sourcing change (e.g.,	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs	[If 'partial' from column 3] If partial, what is the level of	USMCA-related reason for the sourcing change	Indicate if the sourcing change can be attributed to	[If 'partial' from column 3] List any non-ROOs factors
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shifted sourcing of engines from South Korea to United States)		[[dropdown: full, partial]]	attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	[dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	contributing to the sourcing change

- d. [If “Yes” to 2.2.2b] Provide additional information about each **engine** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.2b] For each **engine** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

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Transmissions

2.2.3

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **transmission** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Describe the sourcing change (e.g., shifted sourcing of bodies and chassis from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}

[If no data were reported in 2024 questionnaire] Your firm did not report any **transmission** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **transmission** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes

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for transmissions from 2018 to July 1, 2024, were not reported in question 2.2.3a, please select “Yes” and provide detailed information about those transmission sourcing changes as well as any changes since July 1, 2024.

- ☐ Yes
- ☐ No

- c. [If “Yes” to 2.2.3b] List and describe the **transmission** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

Describe the sourcing change (e.g., shifted sourcing of transmissions from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.3b] Provide additional information about each **transmission** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted

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{carried forward from above}	{carried forward from above}				
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- e. [If “Yes” to 2.2.3b] For each **transmission** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and onetime overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Bodies and chassis

2.2.4

- a. [If data reported in the firm’s 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission’s 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **body and chassis** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm’s change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Describe the sourcing change (e.g., shifted sourcing of bodies and chassis from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}

[If no data were reported in 2024 questionnaire] Your firm did not report any **body and chassis** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **body and chassis** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for bodies and chassis from 2018 to July 1, 2024, were not reported in question 2.2.4a, please select "Yes" and provide detailed information about those body and chassis sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.4b] List and describe the **body and chassis** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing change (e.g., shifted sourcing of bodies and chassis from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.4b] Provide additional information about each **body and chassis** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.4b] For each **body and chassis** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Axles

2.2.5

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including axle sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Describe the sourcing change (e.g., shifted sourcing of axles from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs; [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from	{embedded from	{embedded from		{embedded from	{embedded from	{embedded from	{embedded from

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Describe the sourcing change (e.g., shifted sourcing of axles from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
previous response, not able to be edited}	previous response, not able to be edited}	previous response, not able to be edited}		previous response, not able to be edited}	previous response, not able to be edited}	previous response, not able to be edited}	previous response, but editable}

[If no data were reported in 2024 questionnaire] Your firm did not report any **axle** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **axle** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for axles from 2018 to July 1, 2024, were not reported in question 2.2.5a, please select "Yes" and provide detailed information about those axle sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.5b] List and describe the **axle** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

Describe	Model line	Attribution	[If 'partial'	USMCA-	Indicate if	[If 'partial'
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the sourcing change (e.g., shifted sourcing of axles from South Korea to United States)	of motor vehicle impacted	to the USMCA automotive ROOs ([dropdown: full, partial])	from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	from column 3] List any non-ROOs factors contributing to the sourcing change

d. [If “Yes” to 2.2.5b] Provide additional information about each **axle** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

e. [If “Yes” to 2.2.5b] For each **axle** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line,

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please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Suspension systems

2.2.6

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **suspension system** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Describe the sourcing change (e.g., shifted sourcing of suspension systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}

[If no data were reported in 2024 questionnaire] Your firm did not report any **suspension system** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **suspension system** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for suspension systems from 2018 to July 1, 2024, were not reported in question 2.2.6a, please select "Yes" and provide detailed information about those suspension system sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.6b] List and describe the **suspension system** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing change (e.g., shifted sourcing of suspension systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.6b] Provide additional information about each **suspension system** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

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- e. [If “Yes” to 2.2.6b] For each **suspension system** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Steering systems

2.2.7

- a. [If data reported in the firm’s 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission’s 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **steering system** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm’s change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Describe the sourcing change (e.g., shifted sourcing of steering systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}

[If no data were reported in 2024 questionnaire] Your firm did not report any **steering sourcing** changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **steering system** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for steering systems from 2018 to July 1, 2024, were not reported in question 2.2.7a, please select "Yes" and provide detailed information about those steering system sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.7b] List and describe the **steering system** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing change (e.g., shifted sourcing of steering systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.7b] Provide additional information about each **steering system** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.7b] For each **steering system** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Advanced batteries

2.2.8

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **advanced battery** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Describe the sourcing change (e.g., shifted sourcing of advanced batteries from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
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Describe the sourcing change (e.g., shifted sourcing of advanced batteries from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
d from previous response, not able to be edited}	d from previous response, not able to be edited}	d from previous response, not able to be edited}		d from previous response, not able to be edited}	d from previous response, not able to be edited}	d from previous response, not able to be edited}	d from previous response, but editable}

[If no data were reported in 2024 questionnaire] Your firm did not report any **advanced battery** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **advanced battery** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for advanced batteries from 2018 to July 1, 2024, were not reported in question 2.2.8a, please select "Yes" and provide detailed information about those advanced battery sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.8b] List and describe the **advanced battery** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Indicate the level of attribution to

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the ROOs and attribution to regional value content (RVC) requirements and labor value content (LVC) requirements in the table below.

Describe the sourcing change (e.g., shifted sourcing of advanced batteries from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.8b] Provide additional information about each **advanced battery** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.8b] For each **advanced battery** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line, please report the change in variable cost for the entire model line, not only for

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the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Steel

2.2.9

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **steel** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Describe the sourcing change (e.g., shifted sourcing of steel from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both RVC and LVC, or steel purchasing requirements]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, but editable}

[If no data were reported in 2024 questionnaire] Your firm did not report any **steel** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **steel** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for steel from 2018 to July 1, 2024, were not reported in question 2.2.9a, please select "Yes" and provide detailed information about those steel sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.9b] List and describe the **steel** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing change (e.g., shifted sourcing of steel from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both RVC and LVC, steel purchasing requirements, or none of the above [dropdown: RVC, LVC, both RVC and LVC, steel purchasing requirements, or none of the above]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.9b] Provide additional information about each **steel** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.9b] For each **steel** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model line,

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please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

Aluminum

2.2.10

- a. [If data reported in the firm's 2024 questionnaire response] The table below shows information your firm reported in its response to the Commission's 2024 *USMCA Automotive Rules of Origin Motor Vehicle Producer Questionnaire*, including **aluminum** sourcing changes from January 1, 2018, to July 1, 2024. If the sourcing change was partially attributed to the USMCA automotive ROOs (column 3), please provide the level of attribution to the ROOs (column 4). Additionally, review and update your firm's change in total overhead costs due to the sourcing change.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors. Please calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

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Describe the sourcing change (e.g., shifted sourcing of aluminum from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	Indicate if the sourcing change can be attributed to the RVC, the LVC, or both [dropdown: RVC, LVC, both RVC and LVC, or aluminum purchasing requirements]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}		{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, not able to be edited}	{embedded from previous response, but editable}

[If no data were reported in 2024 questionnaire] Your firm did not report any **aluminum** sourcing changes in its 2024 questionnaire response.

- b. Has your firm made sourcing changes to a motor vehicle's **aluminum** to meet the USMCA automotive ROOs since July 1, 2024, for its North American production? If any sourcing changes for aluminum from 2018 to July 1, 2024, were not reported in question 2.2.10a, please select "Yes" and provide detailed information about those aluminum sourcing changes as well as any changes since July 1, 2024.
- ☐ Yes
- ☐ No
- c. [If "Yes" to 2.2.10b] List and describe the **aluminum** sourcing changes that were made from July 1, 2024, to July 1, 2026 (and any that were not reported in the 2024 questionnaire) to meet the USMCA automotive ROOs in the table below.

Note: Full attribution to the ROOs is appropriate if the sourcing change was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing change was made in part to meet the ROOs, in addition to influences from other factors.

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Describe the sourcing change (e.g., shifted sourcing of aluminum from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing change [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing change can be attributed to the RVC, the LVC, both RVC and LVC, aluminum purchasing requirements, or none of the above [dropdown: RVC, LVC, both RVC and LVC, or aluminum purchasing requirements, none of the above]	[If 'partial' from column 3] List any non-ROOs factors contributing to the sourcing change

- d. [If “Yes” to 2.2.10b] Provide additional information about each **aluminum** sourcing change attributed to the USMCA automotive ROOs in the table below.

Description of the sourcing change	Model line of motor vehicle impacted	Provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percentage of model line of motor vehicle impacted	[If <100 percent in column 5] Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}				

- e. [If “Yes” to 2.2.10b] For each **aluminum** sourcing change attributed to the USMCA automotive ROOs, indicate the change in per-motor vehicle variable costs of production and one-time overhead costs? For sourcing changes impacting less than 100 percent of production of a model

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line, please report the change in variable cost for the entire model line, not only for the vehicles with the sourcing change. Calculate the change in total overhead costs as a total, or lump sum, dollar value and not a per-vehicle dollar value.

Description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars, use minus sign for a decrease in costs)	Change in total overhead costs (in dollars, use minus sign for a decrease in costs)
{carried forward from above}	{carried forward from above}		

2.3 Effects of USMCA automotive ROOs on new model lines

This section asks about the effects of the USMCA automotive ROOs on new model lines of motor vehicles that were introduced to the North American market after the USMCA entered into force on July 1, 2020. For model lines of motor vehicles that were sold in the North American market beginning before the USMCA entered into force, responses should be included in sections 2.1 and 2.2.

Note: The questions below refer to new model lines. By new model lines, the data should reflect new nameplates added and not variants of existing nameplates. This does not include model lines that have been freshened (minor changes to interior and exterior), reengineered (significant engineering changes, such as revised powertrain, chassis, suspension, center stack or interior), or redesigned (new platform, powertrain, or interior).

2.3.1

- a. Since the USMCA entered into force on July 1, 2020, did your firm sell any **new model lines of motor vehicles**?
 - ☐ Yes
 - ☐ No
- b. [If 'yes' to 2.3.1a] Did the USMCA automotive ROOs affect decisions about the location of assembly for new model lines of motor vehicles?
 - ☐ Yes
 - ☐ No
- c. [If "Yes" to 2.3.1.b.] List each model line of motor vehicles whose assembly location decision was affected by the USMCA automotive ROOs in the table below. For each model line of motor vehicle, provide the assembly location decision, select the attribution of the decision to the ROOs, indicate whether the decision was attributed to the RVC, the LVC, or both and list any non-ROOs factors that may have contributed to the decision.

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Note: Full attribution to the ROOs is appropriate if the assembly location decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the assembly location decision was made in part to meet the ROOs, in addition to influences from other factors.

Model line of motor vehicle impacted	Chosen assembly location decision ([textbox])	Likely assembly location absent the USMCA automotive ROOs ([textbox])	Difference in vehicle variable cost between chosen assembly location and alternative assembly location (in dollars, use a minus sign if the chosen location has a lower cost than the alternative location)	Attribution to the USMCA automotive ROOs [dropdown: full, partial]

Table 2.3.1c continued.

[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the assembly location decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if assembly location decision is attributable to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	List any non-ROOs factors contributing to the assembly location decision

2.3.2

- a. [If “Yes” to 2.3.1a] Did the USMCA automotive ROOs affect decisions about the sourcing of parts, steel, or aluminum when the new model lines of motor vehicle were brought into production?
- ☐ Yes
- ☐ No

Engines

2.3.3

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **engine** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If yes to 2.3.3a] List each **engine** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the

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USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

Model line of motor vehicle impacted ([textbox])	Chosen engine source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.3a] Provide additional information about each **engine** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen engine source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

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- d. [If “Yes” to 2.3.3a] For each **engine** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen engine source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Transmissions

2.3.4

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **transmission** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 2.3.4a] List each **transmission** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

Model line of motor	Chosen transmission source	Likely source country	Attribution to the USMCA	[If 'partial' from column 3]	USMCA-related reason for	Indicate if the sourcing	[If 'partial' from column 4]
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vehicle impacted ([textbox])	country ([textbox])	absent the USMCA automotive ROOs ([textbox])	automotive ROOs ([dropdown: full, partial])	If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.4a] Provide additional information about each **transmission** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen transmission source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.4a] For each **transmission** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

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Model line of motor vehicle impacted	Chosen transmission source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Bodies and chassis

2.3.5

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **body and chassis** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
 - ☐ No
- b. [If “Yes” to 2.3.5a] List each **body and chassis** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen body and chassis source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.5a] Provide additional information about each **body and chassis** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen body and chassis source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.5a] For each **body and chassis** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source

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country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen body and chassis source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Axles

2.3.6

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **axle** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
 - ☐ No
- b. [If “Yes” to 2.3.6a] List each **axle** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen axle source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.6a] Provide additional information about each **axle** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen axle source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.6a] For each **axle** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source country. A positive

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value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen axle source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Suspension systems

2.3.7

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **suspension system** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 2.3.7a] List each **suspension system** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen suspension system source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.7a] Provide additional information about each **suspension system** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen suspension system source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.7a] For each **suspension system** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source

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country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen suspension system source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Steering systems

2.3.8

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **steering system** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 2.3.8a] List each **steering system** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen steering system source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the Section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.8a] Provide additional information about each **steering system** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen steering system source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.8a] For each **steering system** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source country. A positive value

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would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen steering system source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Advanced batteries

2.3.9

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **advanced battery** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 2.3.9a] List each **advanced battery** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen advanced battery source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both, or neither [dropdown: RVC, LVC, both, neither]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.9a] Provide additional information about each **advanced battery** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen advanced battery source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.9a] For each **advanced battery** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen source country minus the cost of the engine from the alternative source

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country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen advanced battery source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Steel

2.3.10

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **steel** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
 - ☐ No
- b. [If “Yes” to 2.3.10a] List each **steel** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen steel source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both RVC and LVC, steel purchasing requirements, or none of the above [dropdown: RVC, LVC, both RVC and LVC, steel purchasing requirements, none of the above]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.10a] Provide additional information about each **steel** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen steel source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.10a] For each **steel** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from the chosen

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source country minus the cost of the engine from the alternative source country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen steel source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

Aluminum

2.3.11

- a. [If “Yes” to 2.3.2.a] Has your firm made sourcing decisions to a new model line of motor vehicle’s **aluminum** to meet the USMCA automotive ROOs since January 1, 2018, for its North American production?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 2.3.11a] List each **aluminum** sourcing decision that was affected by the USMCA automotive ROOs in the table below. For each decision, provide the impacted new model line of motor vehicle and the chosen source country, select the level of attribution to the ROOs, indicate the USMCA-related reason for the decision, and list any non-ROOs factors that may have contributed to the decision.

Note: Full attribution to the ROOs is appropriate if the sourcing decision was only made to meet the ROOs. Partial attribution to the ROOs is appropriate if the sourcing decision was made in part to meet the ROOs, in addition to influences from other factors.

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Model line of motor vehicle impacted ([textbox])	Chosen aluminum source country ([textbox])	Likely source country absent the USMCA automotive ROOs ([textbox])	Attribution to the USMCA automotive ROOs ([dropdown: full, partial])	[If 'partial' from column 3] If partial, what is the level of attribution due to the ROOs: [dropdown: the most important factor, an important factor, a moderate factor, a minor factor]	USMCA-related reason for the sourcing decision [dropdown: to qualify the vehicle and/or parts, to reduce the section 232 tariff cost, both, another reason]	Indicate if the sourcing decision can be attributed to the RVC, the LVC, both RVC and LVC, aluminum purchasing requirements, or none of the above [dropdown: RVC, LVC, both RVC and LVC, aluminum purchasing requirements, none of the above]	[If 'partial' from column 4] List any non-ROOs factors contributing to the sourcing decision ([textbox])

- c. [If “Yes” to 2.3.11a] Provide additional information about each **aluminum** sourcing decision for new vehicle models attributed to the USMCA automotive ROOs in the table below.

Model line of motor vehicle impacted	Chosen aluminum source country	Likely source country absent the USMCA automotive ROOs	Provide a brief explanation for the sourcing decision	Year the model line was first sold in the United States	Percentage of model line of motor vehicle impacted	Provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above}	{carried forward from above}	{carried forward from above}				

- d. [If “Yes” to 2.3.11a] For each **aluminum** sourcing decision attributed to the USMCA automotive ROOs, what was the difference in variable costs between sourcing from the chosen source country and alternative source country? (Calculate the difference as the cost of the engine from

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the chosen source country minus the cost of the engine from the alternative source country. A positive value would indicate that the engine from the chosen source country was more expensive than the alternative option.)

Model line of motor vehicle impacted	Chosen aluminum source country	Likely source country absent the USMCA automotive ROOs	Difference in vehicle variable cost between chosen source country and alternative source country (in dollars, use a minus sign if the chosen source country has a lower cost than the alternative source country)
{carried forward from above}	{carried forward from above}	{carried forward from above}	

SECTION 3. Effects of the USMCA automotive ROOs

3.1 Regional Value Content (RVC) and Labor Value Content (LVC)

- a. Provide the USMCA automotive RVC and LVC, in percentages, for all models for which your firm calculated RVC and LVC pursuant to the USMCA for 2024 and 2025. In answering this question, first indicate whether you will provide this information for all models at once or use the aggregations that you reported to U.S. Customs and Border Protection (CBP).
 - ☐ All models
 - ☐ Use groupings from average annual election process reported to CBP
- b. For question 3.1, indicate if your firm will be providing information on a calendar year basis or fiscal year basis.
 - ☐ Calendar year
 - ☐ Fiscal year
- c. [If “fiscal year” is selected in 3.1b] Indicate the starting month of your firm’s fiscal year.

- d. [If ‘all models’ is selected in 3.1a provide table below] Provide the aggregate USMCA automotive RVC and LVC, in percentages, for all models for which your firm calculated RVC and LVC pursuant to the USMCA for 2024 and 2025.

	2024	2025
RVC (%)		
LVC (%)		

- e. [If “use groupings from average annual election process reported to CBP” is selected in 3.1a] For the purposes of calculating USMCA automotive RVC and LVC, how many aggregations did you report to CBP? _____ [max of 50]
- f. [If “use groupings from average annual election process reported to CBP” is selected in 3.1a] For each aggregation listed in 3.1e, include the amount of production, list the model lines of motor vehicles included in the aggregation, and provide the RVC and LVC, in percentages, for 2024 and 2025.

List

[One table for each aggregation listed in 3.1b]

Metric	2024	2025
Production (in units)		
Included model lines of motor vehicles		
RVC (%)		

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LVC (%)		
---------	--	--

- g. Provide your firm-level percentage of steel and aluminum (by value) that was sourced from North America for 2024 and 2025.

	2024	2025
Steel		
Aluminum		

3.2 Wages

- a. Since July 1, 2024, has your firm increased wages at any of its North American parts or assembly plants so that they qualify for LVC certification?
- ☐ Yes
 - ☐ No, raised wages for reasons other than LVC
 - ☐ No, did not raise wages

- b. [If “No, raised wages for reasons other than LVC” to 3.2a] Please explain:

3.3 Automation

- a. How have production changes made to meet USMCA ROOs requirements (and any related labor cost changes) changed your firm’s use of automation in the production process?
- ☐ Increased use of automation
 - ☐ Minimal change in use of automation
 - ☐ Decreased use of automation
 - ☐ Not applicable

- b. Please explain: _____

3.4 Innovation

- a. In what ways have the USMCA automotive ROOs affected innovation at your firm since January 1, 2020? (check all that apply)?
- ☐ Increased R&D investment
 - ☐ Decreased R&D investment
 - ☐ Increased ability to bring new products to market
 - ☐ Decreased ability to bring new products to market
 - ☐ Improved design or production processes
 - ☐ Constrained design or production processes
 - ☐ Other (please specify)

- b. Please explain: _____

3.5 Product differentiation

3.5.1

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- a. Has your firm changed the variety of models sold in North America since the USMCA automotive ROOs entered into force?
- ☐ Increased variety of models, at least partially because of the USMCA
 - ☐ Increased variety of models, but not because of the USMCA
 - ☐ No change
 - ☐ Reduced variety of models, at least partially because of the USMCA
 - ☐ Reduced variety of models, but not because of the USMCA
- b. Please explain: _____

3.5.2

- a. Has your firm adjusted major features (e.g., engines, trim levels, etc.) of its vehicles since the USMCA automotive ROOs entered into force?
- ☐ Increased features, but not because of the USMCA
 - ☐ Increased features, at least partially because of the USMCA
 - ☐ No change
 - ☐ Reduced features, but not because of the USMCA
 - ☐ Reduced features, at least partially because of the USMCA
- b. Please explain: _____

3.6 Resilience

3.6.1

- a. Have the changes that your firm made to its supply chain in response to the USMCA automotive ROOs since July 1, 2024, affected your firm's ability to maintain motor vehicle production operations when facing **non-North American** supply chain disruptions (for example, if a non-North American supplier is temporarily unable to supply at the expected level)?
- ☐ Our firm is **better able** to maintain motor vehicle production because of the changes it made to its supply chain in response to the USMCA automotive ROOs.
 - ☐ Our firm is **less able** to maintain motor vehicle production because of the changes it made to its supply chain in response to the USMCA automotive ROOs.
 - ☐ No change in ability to maintain motor vehicle production operations.
 - ☐ Unclear because of the complexity of the supply chain.
- b. Please explain: _____

3.6.2

- a. Have the changes your firm made to its supply chain in response to the USMCA automotive ROOs since July 1, 2024, affected your firm's ability to maintain motor vehicle production operations when facing **North American** supply chain disruptions (for example, if a North American supplier is temporarily unable to supply at the expected level)?
- ☐ Our firm is **better able** to maintain motor vehicle production because of the changes it made to its supply chain in response to the USMCA automotive ROOs.

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- ☐ Our firm is **less able** to maintain motor vehicle production because changes it made to its supply chain in response to the of the USMCA automotive ROOs.
- ☐ No change in ability to maintain motor vehicle production operations.
- ☐ Unclear because of the complexity of the supply chain.

b. Please explain: _____

3.7 Trade

3.7.1

- a. Have the USMCA automotive ROOs affected your firm's U.S. exports since July 1, 2024?
 - ☐ Yes
 - ☐ No
- b. [If "Yes" to 3.7.1a] How have the USMCA automotive ROOs affected your firm's U.S. exports since entry into force of the USMCA?

Export market	Effect of the USMCA automotive ROOs on exports [dropdown: decrease in exports of greater than 5 percent, decrease in exports of 0 to 5 percent, no effect in exports, increase in exports of 0 to 5 percent, increase in exports of greater than 5 percent]
Exports to Canada and Mexico	
Exports to other countries	

3.7.2

- a. Since the USMCA entered into force, did your firm pay a duty for **passenger vehicles**, **light trucks**, or **heavy trucks** when importing **production motor vehicles** into Canada, Mexico, or the United States from a USMCA partner country rather than meet the USMCA automotive ROOs?
 - ☐ Yes
 - ☐ No
- b. [If "Yes" to 3.7.2a] Provide the following information by model line of motor vehicle:

Model line of motor vehicle for which duty was paid	Importing country [dropdown: Canada, Mexico, United States]	Year(s) additional duty paid [dropdown: by year]	Number of vehicles per year that paid a duty	Tariff rate paid attributable to automotive ROO non-qualification

- c. [if "Yes" to 3.7.2a] Please explain: _____

3.7.3

- a. Since the USMCA entered into force, did your firm pay the most-favored-nation rate of duty for those parts listed in section 2.2 (i.e., those listed in table A.1 of the agreement) when importing those parts into Canada, Mexico, or the United States from a USMCA partner country rather

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than meet the USMCA automotive ROOs? (Note: do not include parts where duty is expected to be refunded once certification process is completed).

- ☐ Yes
- ☐ No

b. [If “Yes” to 3.7.3a] Provide the following information by part and model line of motor vehicle:

Part for which duty was paid [dropdown: engine, transmission, body and chassis, axle, suspension system, steering system, advanced battery]	Model line of motor vehicle impacted	Importing country [dropdown: Canada, Mexico, United States]	Year(s) additional duty paid [dropdown: by year]	Number of parts per year that paid a duty	Tariff rate paid attributable to automotive ROO non-qualification

c. [if “Yes” to 3.7.3a] Please explain: _____

3.7.4

On April 3, 2025, President Trump announced 25 percent tariffs on light vehicle and light vehicle part imports under section 232. For USMCA-qualifying vehicles, the tariffs were only applied to non-U.S. content. USMCA-qualifying parts may enter duty-free as well.

- a. Did the structure of these tariffs lead your company to change the share of its vehicle and parts imports from Canada and Mexico that entered under the USMCA?
 - ☐ Increased share of imports that qualified for USMCA treatment
 - ☐ No change
 - ☐ Decreased share imports that qualified for USMCA treatment
- b. [If increase in 3.7.4a] How did your company increase the share of its vehicle and parts imports that qualified for USMCA treatment (select all that apply)?
 - ☐ Adjusted supply chain to meet USMCA automotive ROOs by increasing RVC, LVC, steel, or aluminum content
 - ☐ Increased survey response from suppliers to certify qualification of parts that could already qualify for USMCA treatment, but the supplier had not completed the paperwork for those parts
 - ☐ Reduced imports of non-USMCA vehicles and parts
- c. [If increase in 3.7.4a] What country did you increase RVC, LVC, steel, or aluminum content from (select all that apply)?
 - ☐ United States
 - ☐ Canada

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☐ Mexico

3.7.5

From May 2025 to July 2026, please provide the effective duty rate and estimated U.S. content share at the model level for all vehicle models your company imported from Canada or Mexico into the United States. The effective duty rate is calculated as tariffs paid less refunds received, divided by the customs value, reflecting the real tariff burden rather than the statutory rate. Please include all applicable duties and tariff reductions (including MFN, section 232, IEEPA, section 9802 etc. as applicable). Do not include vehicle imports from U.S. FTZs (i.e. FTZ06 entries).

Model line of vehicle	Import source [dropdown: Canada, Mexico, both]	Effective duty rate	Estimated U.S. content share

3.7.6

Tariff Actions in 2025: How have tariff actions in 2025 affected your sourcing decisions? Please explain:

3.8 Investment

3.8.1

Based on your firm's operations since entry into force of the USMCA, have the USMCA automotive ROOs affected the investment environment for automotive production in North America (select all that apply)?

- ☐ No change
- ☐ Increased cost certainty
- ☐ Decreased cost certainty
- ☐ Increased regulatory certainty
- ☐ Decreased regulatory certainty
- ☐ Other (please specify)

3.8.2

Have the USMCA automotive ROOs influenced your firm's investment plans for vehicle production in the USMCA region since entry into force of the agreement?

- ☐ Decreased likelihood of investment
- ☐ No change
- ☐ Increased likelihood of investment in the USMCA region, rather than outside of the USMCA region
- ☐ Increased likelihood of shifting investment into the United States from Canada or Mexico
- ☐ Both increased the likelihood of investment in the USMCA region and increased the likelihood of shifting investment into the United States, from Canada or Mexico.

3.8.3

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How has uncertainty about the future of USMCA influenced your firm's investment plans for vehicle production in the USMCA region since July 2024?

- ☐ Decreased likelihood of investment
- ☐ No change
- ☐ Increased likelihood of investment in the USMCA region, rather than outside of the USMCA region
- ☐ Increased likelihood of shifting investment into United States from Canada or Mexico
- ☐ Both increased the likelihood of investment in the USMCA region and increased the likelihood of shifting investment into the United States from Canada or Mexico.

3.8.4

Has uncertainty about the future of USMCA led your firm to delay its investment plans for vehicle production in the USMCA region since July 2024?

- ☐ Yes
- ☐ No

3.8.5

Has uncertainty about the future of USMCA led your firm to delay its sourcing changes in the USMCA region since July 2024?

- ☐ Yes
- ☐ No

SECTION 4. Technological Changes

This section asks about the extent to which the USMCA automotive ROOs remain relevant in light of technological changes occurring in the automotive industry. Section 4 consists of two subsections: The first asks about the technological changes that the Commission examined in its 2025 report; the second asks for information related to any additional technological changes that may impact the continued relevancy of the USMCA automotive ROOs.

4.1 Impact on the overall continued relevancy of the USMCA automotive ROOs

In its second report, the Commission identified technological changes in the U.S. automotive industry that have occurred, or are in the process of occurring, since the negotiation of the USMCA and evaluated the extent to which these technological changes affect the application of the USMCA automotive ROOs in the U.S. automotive industry.¹⁰ For each of these topics below, indicate the extent to which the specified technological change has had any impact on the overall continued relevancy of the USMCA automotive ROOs since July 1, 2024, as those changes pertain to your firm.¹¹

The tariff classification of electric vehicles (EV) and hybrid light trucks:

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: The production of EV and hybrid pickup trucks and work vans has increased significantly since the negotiation of the USMCA. However, the tariff classification of these vehicles has diverged from that of internal-combustion vehicles. The USMCA was written in HS 2012 nomenclature, and HS subheading 8704.90 was classified as a heavy truck under the USMCA. HS subheading 8704.90, in HS 2012 nomenclature, is where EV and hybrid trucks were classified, regardless of their size. This means that EV and hybrid trucks under 5 tons (those classified under 8704.41, 8704.51, and 8704.60 in more recent HS nomenclature), which most would consider light trucks, are classified as heavy trucks under the USMCA.¹² This results in a different set of ROOs for EV and hybrid trucks compared to light trucks with internal combustion engines. As the volume of EV and hybrid pickup trucks and work vans continues to increase, this means that the share of trucks weighing less than five tons treated as heavy trucks will continue to increase.¹³

4.1.1

¹⁰ Section 202A(g)(2)(C) of the USMCA Implementation Act directs the Commission in its report to examine “whether the automotive rules of origin are relevant in light of technological changes in the United States.” The Act does not define “relevant.” USMCA Implementation Act, 19 U.S.C. § 4532(g)(2)(C).

¹¹ Electric vehicles and hybrids refer to vehicles that fall under the following HS subheadings and use electric motors for propulsion: 8701.22, 8701.23, 8701.24, 8701.90, 8702.20, 8702.30, 8702.40, 8702.90, 8703.40, 8703.50, 8703.60, 8703.70, 8703.80, 8703.90, 8704.41, 8704.42, 8704.43, 8704.51, 8704.52, 8704.60, and 8704.90. Each of these topics was discussed in more detail in chapter 5 of the Commission’s *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2025 Report*, which can be found [here](#).

¹² In February 2024, CBP published a CROSS ruling that certain hybrid pickup trucks would have been classified under a light truck subheading (8704.31) using 2012 nomenclature. CBP, CROSS database, N337574, February 8, 2024.

¹³ For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 158–160.

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- a. Does your firm currently produce any EV or hybrid light trucks (e.g., a hybrid or electric pickup truck or work van) in North America that are classified as a heavy truck under the USMCA?
- ☐ Yes
- ☐ No
- b. [If “Yes” to 4.1.1a] List the current model line(s) of motor vehicle: _____
- c. Has your firm publicly announced future plans to produce any EV or hybrid light trucks in North America that will be classified as a heavy truck under the USMCA?
- ☐ Yes
- ☐ No
- d. [If “Yes” to 4.1.1c] List the future model line(s) of motor vehicle: _____
- e. [If “Yes” to 4.1.1a or 4.1.1b] How impactful is the increase in production of EV and hybrid pickup trucks and work vans and their classification as heavy trucks on the continued relevancy of the USMCA automotive ROOs related to these goods?

Factor	No impact	Minimal impact	Some impact	Large impact
Classification of EV and hybrid pickup trucks and work vans as a heavy truck				

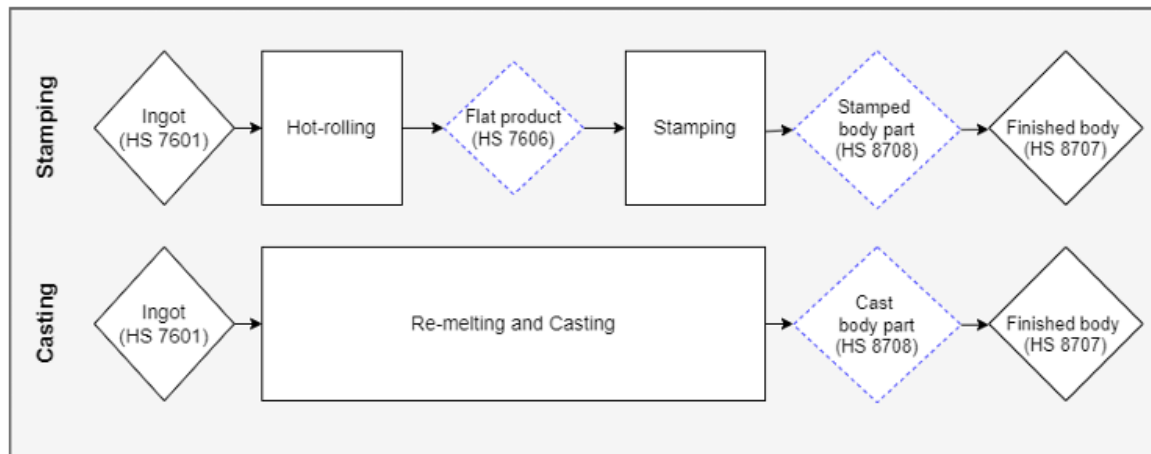
- f. [If “Yes” to 4.1.1a or 4.1.1b] Please explain: _____

Differences between tariff-shift rules for stamped vs. cast aluminum motor vehicle body parts

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: Aluminum automotive bodies were traditionally made from stamped aluminum body parts, but aluminum casting is increasingly becoming an alternative method of production for automotive bodies and offers certain advantages compared to stamping. The USMCA automotive ROOs for aluminum are such that stamped aluminum motor vehicle body parts can qualify as originating if certain intermediate production steps are performed within the USMCA region, even if the process uses non-originating aluminum ingots. However, because the casting production process does not have an equivalent intermediate production step, producers cannot qualify comparable cast body parts as originating, unless the ingot itself was originating (see figure 4.1 below).¹⁴

¹⁴ For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 160–161.

Figure 4.1 A comparison of stamping and casting automotive body manufacturing processes



Source: USITC-generated graphic.

Note: The figure shows the difference in automotive body production processes and when tariff code shifts occur. Diamonds represent various aluminum goods. Diamonds with solid boundaries represent the initial and final goods. Diamonds with dashed boundaries represent intermediate goods, which are consumed to produce the final goods. The blue coloration indicates where the tariff shift occurs. Squares and rectangles represent production processes. The figure's takeaway is that aluminum inputs subject to stamping experience a tariff shift, but aluminum inputs for casting do not qualify for a tariff shift.

Source: USITC, *USMCA Automotive Rules of Origin*, June 2023, 92.

4.1.2

- Does your firm cast aluminum body parts for production of motor vehicles in North America?
 - ☐ Yes
 - ☐ No
- [If "No" to 4.1.2a] Does your firm currently have plans to cast aluminum body parts for the production of motor vehicles in North America by December 31, 2027?
 - ☐ Yes
 - ☐ No
- [If "Yes" to 4.1.2a or 4.1.2b] Please explain the extent to which your firm casts aluminum body parts or plans to do so in the future (e.g., use in a few vehicle models, most vehicles, etc.):

- [If "Yes" to 4.1.2a or 4.1.2b] How impactful is the use of cast versus stamped aluminum body parts on the continued relevancy of the USMCA automotive ROOs related to these goods?

Factor	No impact	Minimal impact	Some impact	Large impact
Differences between tariff-shift rules for stamped vs. cast aluminum body parts				

- [If "Yes" to 4.1.2a or 4.1.2b] Please explain: _____

The tariff classification of electric motors:

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: Hybrid and electric vehicles use electric motors to propel the vehicle. Electric motors, along with the transmission, can be combined with a range of additional auto-specific components to create a single drive unit, sometimes referred to as an e-axle. Depending on which components are included on the e-axle, it replaces several core and principal parts for hybrid and electric vehicles. The HS classification of the electric motors, and by extension the RVC requirement, differs depending on the components attached to the e-axle.¹⁵

4.1.3

- a. Does your firm currently produce hybrid or electric vehicles in North America?
 - ☐ Yes
 - ☐ No
- b. [If “Yes” to 4.1.3a] Does your firm currently produce electric motors to power the wheels in your hybrid or electric vehicles?
 - ☐ Yes
 - ☐ No
- c. [If “Yes” to 4.1.3a] Does your firm import electric motors to power the wheels in your hybrid or electric vehicles?
 - ☐ Yes
 - ☐ No
- d. [If “Yes” to 4.1.3c] List the HS subheading(s) under which your firm imports electric motors (e.g., HS subheading 8501.53, HS subheading 8708.99) and source country(ies) of your firm’s imports of electric motors. If multiple, list in order of import share:

HS subheading (e.g., HS subheading 8501.53, HS subheading 8708.99)	Source country [dropdown: country list]

- e. [If “Yes” to 4.1.3a and 4.1.3c] How impactful are the differences in the HS classification of electric motors on the continued relevancy of the USMCA automotive ROOs related to these goods?

Factor	No impact	Minimal impact	Some impact	Large impact

¹⁵ When the e-axle is classified as an electric motor in HS subheading 8501.53, it has an RVC requirement of 50 percent; whereas, if it is classified as a part of a motor vehicle in HS subheading 8708.99, then the RVC requirement would be 70 percent. For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 161–164.

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Differences in the HS classification of electric motors				
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f. [If “Yes” to 4.1.3a and 4.1.3.c] Please explain:

The increasing importance of nontraditional motor vehicle inputs

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: The value of nontraditional motor vehicle inputs in the motor vehicle supply chain continues to rise, as does the share of the final motor vehicle cost encompassed by these inputs. However, these inputs are typically not classified as motor vehicle parts in the *Harmonized System* and are typically not subject to any product-specific automotive rules of origin under the USMCA. Examples of these inputs include advanced semiconductors, sensors, cameras, and touch screens.¹⁶

4.1.4

- a. How impactful is the increasing importance of nontraditional motor vehicle inputs (and the lack of USMCA automotive ROOs for these goods) on the continued relevancy of the USMCA automotive ROOs?

Factor	No impact	Minimal impact	Some impact	Large impact
Increased importance of nontraditional motor vehicle inputs				

b. Please explain: _____

The lack of recycling specific provisions for advanced batteries in the USMCA Automotive ROOs

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: As the first generation of EV and hybrid vehicles reach their end-of-life cycle for the batteries powering those vehicles, battery recycling will be an increasingly important part of the automotive supply chain. However, the USMCA automotive ROOs do not provide recycling-specific provisions for advanced batteries. This means that the determination of whether the advanced battery made using recycled materials (e.g., cathode active material, black mass) qualifies as originating under the USMCA is made on the basis of the same ROOs for the original battery, whether or not the cells were created with recycled material. This lack of recycling-specific provisions will continue to increase in importance as more first-generation EV batteries reach their end-of-life cycle.¹⁷

4.1.5

¹⁶ For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 165–166.

¹⁷ For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 167–168.

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- a. Does your firm currently use advanced batteries with recycled inputs in its North American supply chain (e.g., recycled cathode active material, black mass)?
- ☐ Yes
- ☐ No
- b. [If “No” to 4.1.5a] Does your firm plan to use advanced batteries with recycled inputs in its North American supply chain by December 31, 2027?
- ☐ Yes
- ☐ No
- c. [If “Yes” to 4.1.5a or 4.1.5b] Where does (or will) this recycling occur (city, state/province/territory, country)? _____
- d. [If “Yes” to 4.1.5a or 4.1.5b] How impactful is the lack of recycling specific provisions for advanced batteries in the USMCA on the relevancy of the USMCA automotive ROOs related to these goods?

Factor	No impact	Minimal impact	Some impact	Large impact
Lack of recycling specific provisions for advanced batteries				

- e. [If “Yes” to 4.1.5a or 4.1.5b] Please explain: _____

The continued relevancy of the various USMCA motor vehicle parts lists

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: The composition of an EV or hybrid vehicle is different than that of traditional vehicles powered by internal combustion engines, and these differences are becoming increasingly important as a larger and larger share of vehicles in North America are increasingly EVs or hybrid vehicles. During the course of conducting the Commission’s 2025 investigation, which produced *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2025 Report*, stakeholders disagreed about the extent to which the core, principal, and complementary parts lists in the USMCA remain relevant in light of the shift to electric vehicles, as well as the need for continued monitoring and potential updating of the USMCA’s various motor vehicle parts lists.¹⁸

4.1.6

- a. Does your firm view the USMCA motor vehicle parts lists (core, principal, and complementary) as still relevant in light of the shift to EVs and hybrid vehicles and any other industry shifts since entry into force of the USMCA?
- ☐ Yes
- ☐ Maybe
- ☐ No

¹⁸ For more information, see USITC, *USMCA Automotive Rules of Origin*, July 2025, 152–155.

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b. Please explain: _____

c. How impactful is the continued shift to EVs and hybrid vehicles on the continued relevancy of the USMCA automotive ROOs related to these vehicles?

Factor	No impact on relevancy	Minimal impact on relevancy	Some impact on relevancy	Large impact on relevancy
Continued shift to EVs and hybrid vehicles				

d. Please explain: _____

e. How impactful would the continued monitoring of the USMCA parts lists, and potential updates to those lists, be on your firm's ability to qualify vehicles under the USMCA automotive ROOs?

Factor	No impact on qualification	Minimal impact on qualification	Some impact on qualification	Large impact on qualification
Continued monitoring of, and potential updates to, the USMCA parts lists				

f. Please explain: _____

4.1.7

Do you believe that the USMCA automotive ROOs fully address any changes in the automotive industry related to the transition to electric and hybrid vehicles? _____

4.2 Impact on the future relevancy of the USMCA automotive ROOs

In addition to the topics covered in the second report, the Commission is tasked with continuing to monitor and analyze technological changes that may impact the future relevancy of the USMCA automotive ROOs.

4.2.1 Describe any other technological changes that have occurred since July 1, 2024, in the North American automotive industry that may have impacted the relevancy of the USMCA automotive ROOs. This includes changes in the composition of motor vehicles, changes to key parts of motor vehicles, changes in production processes, etc. _____

4.2.2 Describe any other technological changes you expect to occur in the North American automotive industry between July 1, 2024, and the end of 2027 that may impact the relevancy of the USMCA

Confidential Business Information

automotive ROOs. This includes changes in the composition of motor vehicles, changes to key parts of motor vehicles, changes in production processes, etc. _____

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SECTION 5. Other Information [NARRATIVE RESPONSE PROMPT]

5.1 If your firm would like to further explain any of the responses in this questionnaire or provide additional information about impacts of the USMCA automotive ROOs to your firm, use the space below.

DRAFT

SECTION 6. Certification

The undersigned certifies that the information supplied herein in response to this questionnaire is complete and accurate to the best of their knowledge and belief. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information which it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information.

The undersigned acknowledges that all information, including confidential business information, submitted in this questionnaire response and throughout this investigation may be disclosed to and used by:

- (i) the Commission, its employees and Offices, and contract personnel
 - (a) for developing or maintaining the records of this or a related proceeding, or
 - (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or
- (ii) U.S. Government employees and contract personnel
 - (a) for cybersecurity purposes or
 - (b) in monitoring user activity on U.S. Government classified networks.

The undersigned understands that all contract personnel will sign appropriate nondisclosure agreements. The Commission will not disclose any confidential business information, unless such information is otherwise available to the public. The Commission may aggregate the information you provide with information from other questionnaire responses, but the Commission will not publish information obtained from your questionnaire or an aggregation of your and other questionnaire responses in a manner that would identify your firm or reveal the operations of your firm.

Certifier's name and title	Date of certification

Check the box below in place of a written signature to indicate that the authorized official listed above has certified the information provided.

☐ Certified

Before submitting your firm's completed questionnaire, report the actual number of hours required and the cost to your business of completing this questionnaire, including all preparatory activities.

Number of hours: _____

Cost (\$): _____