1SUPPORTING STATEMENT
UNITED STATES INTERNATIONAL TRADE COMMISSION QUESTIONNAIRE

Investigation No. 332-608

USMCA Automotive Rules of Origin: Economic Impact and Operation, 2027 Report

Part A-Justification

1. Request for regular action

The U.S. International Trade Commission (Commission) is seeking approval for use of a questionnaire in connection with the third of a series of five biennial reports 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)) (USMCA Implementation Act). The Commission is required to prepare reports that present an overview of the USCMA automotive rules of origin (ROOs) and their impact on the U.S. economy and automotive industry, effects on the competitiveness of the U.S. automotive industry, and the relevancy of the ROOs in light of technological changes, and to submit those reports to the President, the House Committee on Ways and Means, and the Senate Committee on Finance. The first of the reports was delivered on June 30, 2023, and the second was delivered on July 1, 2025, with three additional reports due in 2027, 2029, and 2031. Similar to the second report, the Commission is conducting a survey of U.S. vehicle producers to analyze the impact of the ROOs on the aforementioned factors for the 2027 report. The Commission will submit this report to the President, the House Committee on Ways and Means, and the Senate Committee on Finance by July 1, 2027.

The survey aims to collect information on the impact of the ROOs on the statutorily required factors, as well as information on how the ROOs influence U.S. vehicle producers' decisions on supply chain sourcing of core parts (i.e., engines and transmissions) or materials (i.e., steel and aluminum), employment, investment, and location of vehicle assembly. The questionnaire is one method through which the Commission will collect information for this investigation that is not publicly available from other sources. The Commission plans to issue one questionnaire for this investigation. On April 10, 2026, the Commission posted its draft questionnaire on its website (https://www.usitc.gov/USMCAAutoROO) and published a request for public comments on the draft in the *Federal Register*. The Commission received no public comments on the questionnaire during the 60-day public comment period (April 10, 2026 – June 9, 2026).
As indicated above, the USMCA Implementation Act requires that the Commission submit its third report in this series by July 1, 2027. This deadline necessitates prompt issuance of questionnaires. Requests to complete the online questionnaire are tentatively scheduled to be emailed to respondents on or before September 18, 2026. Responses are due to the Commission 30 days after the initial email to respondents are sent.

2. Purpose

Under the USMCA Implementation Act, the Commission is to submit a report on the estimated effects of the USMCA automotive ROOs on sourcing changes and related production costs involving established supply chains and motor vehicle production, new motor vehicle production, and motor vehicle parts and materials. The Commission will focus on motor vehicle producers that have manufactured and assembled motor vehicles in the United States since January 1, 2018. The Commission will analyze how the ROOs impact the U.S. economy and automotive industry, how the ROOs affect U.S. competitiveness, and whether the ROOs remain relevant in light of technological changes.

The use of a questionnaire will allow the Commission to collect relevant information required under the USMCA Implementation Act, aiding the Commission in fulfilling its statutory duty to provide the requested analysis and report. The information to be collected is critical to the Commission's task in addressing the requirements under the USMCA Implementation Act because such data are not publicly available. The information collected from questionnaire responses will be aggregated by the Commission to preserve the confidentiality of information received from the individual responding businesses.

As drafted, the questionnaire mandates a response from recipients. Section 333(a) of the Tariff Act of 1930 (19 U.S.C. 1333(a)) authorizes the Commission, in carrying out its functions and duties in connection with any investigation authorized by law, to obtain information from "any person, firm, copartnership, corporation, or association," including by subpoena or other order to furnish information. Failure to require mandatory responses would likely significantly depress response rates. Without a strong response rate, certain aspects of the Commission's analysis of the impact of the ROOs will be less robust in, or absent from, its report to be submitted in compliance with the requirements under the USMCA Implementation Act.

3. Use of technology

The Commission will use survey software to allow respondents to complete an online questionnaire. The online version will be programmed to ensure respondents see only questions that are relevant to them or that include options based on responses to previous questions. The online form incorporates quality control functions, submission buttons, and summation functions and will require an individual questionnaire token for each respondent to access the questionnaire. A PDF version of the questionnaire that can be used for reference will also be available for download from the Commission website.

4. Non-duplication of available data

To the extent possible, the Commission's investigation will rely on existing publicly available data. Commission staff has reached out to government, academic, and industry leaders in this sector, and has confirmed that there are no publicly available data for portions of the analysis required in the report and that distribution of a questionnaire is the only viable method by which to obtain the additional data. Further, after a thorough background search of data sources for this investigation, it has been determined that no other industry, government, or academic organizations collect or publish data that are duplicative of the data requested in the questionnaire.

5. Impact on small businesses

To minimize the reporting burden, the questionnaire was designed to be as brief as possible, consistent with information requirements. Skip logic ensures that businesses answer only relevant sections. Check-the-box and select-from-a-list response options, as well as optional reporting sections, are used to simplify the questionnaire where appropriate. In addition, the questionnaire indicates that carefully prepared estimates are acceptable, which should further reduce the potential burden on smaller businesses that may not have a great amount of administrative resources or automated record-keeping systems.

6. Consequences of non-collection

Due to the lack of data from other sources on the direct impacts of the USMCA automotive ROOs, without this information collection, certain aspects of the Commission's analysis of the impact of the ROOs will be less robust in, or absent from, its report to be submitted in compliance with the requirements under the USMCA Implementation Act.

7. Frequency of data collection

This is a one-time, nonrecurring data collection.

8a. Consistency with 5 CFR 1320.6 guidelines

No special circumstances exist that require the collection to be conducted in a manner inconsistent with the guidelines of 5 CFR 1320.6. If any respondents do not maintain information in the format requested by the questionnaire, they are requested to submit carefully prepared estimates based upon available information.

8b. Consultations with affected public

The Commission's 60-day notice requesting public comment was published in the *Federal Register* on April 10, 2026. The notice and other information related to this investigation were published on the Commission's internet site at https://www.usitc.gov/USMCAAutoROO. No comments were received.

The Commission's 30-day notice of submission to OMB requesting clearance was published in the *Federal Register* on XXXX XX, 2026. The notice is also posted on the Commission's internet site at https://www.usitc.gov/research_and_analysis/what_we_are_working_on.htm.

Commission staff tested the questionnaire regarding the availability of data, reporting burden, product coverage and definitions, clarity of instructions, disclosure, and reporting format as well as conducted interviews with individual firms for feedback on specific questions. All testers received copies of the draft questionnaire. Commission staff conducted cognitive interviews with nine testers and requested comments from six testers, receiving comments from one. All feedback has been addressed.

9. Payments or gifts

Not applicable. Questionnaire recipients will not be provided with any payment or gifts for their responses.

10. Assurances of confidentiality

In the questionnaire, the Commission provides recipients with an assurance of confidentiality, indicated in the following paragraph:

“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.”

11. Sensitive information

The Commission is not seeking information on issues of a sensitive nature involving persons or businesses.

12. Respondents’ projected cost burden

The Commission has reduced the reporting burden on respondents by using an online form with skip logic and piping and by limiting the length and complexity of the questionnaire. Furthermore, the questionnaire only contains questions that the Commission believes to be readily available from businesses’ existing records.

The reporting burden is estimated to be:

Number of respondents:	(No.)	25
Frequency of response:	(No.)	1
Average burden per respondent:	(hours)	25
Total burden:	(hours)	625

These estimates are based on reported response statistics from recently completed, similar surveys that the Commission has conducted and the feedback during cognitive testing from industry participants. It is estimated that completing the questionnaire, including time to gather necessary information, would take approximately 25 hours depending on the size and complexity of the business. The burden on individual respondents may vary; newer businesses will likely have fewer questionnaire sections to complete than more established businesses. Not all sections of the questionnaire apply to all firms. Moreover, the total burden is likely to be considerably lower due to the small population for this survey.

The Commission has included a notice of the above response burden averages in the questionnaire, along with a request that respondents send comments to the Commission and to OMB.

The combined annualized cost to all respondents for the estimated burden hours identified above is as follows:

Cost burden estimate= 625 hours x $92.40 per hour = $57,750

13. Annual public response burden

This is a one-time collection of information, and therefore the total recurring annual cost burden is zero.

a. Total capital and start-up cost component: The Commission does not expect any capital and start-up costs because all information likely already exists in businesses' records storage facilities.

b. Total operation and maintenance and purchase of service component: The Commission does not expect respondents will need to purchase any services in completing the questionnaire.

14. Federal change in burden

The estimated total cost to the Federal Government is $177,504 as detailed below. No new equipment will be purchased because existing equipment will be used to process the questionnaires.

The estimated number of work hours includes designing the questionnaires, soliciting field test comments, editing results (i.e., contacting respondents after completion of the questionnaires to clarify responses), and compiling and tabulating questionnaire responses.

Total personnel cost[1]	= $177,504
Operational costs[2]	= $0
Total cost	= $177,504

15. Program change justification

The Commission currently imposes no reporting burden on businesses with respect to the USMCA automotive ROOs. The burden on businesses increased because of the requirements under the USMCA Implementation Act to provide a report on this topic, part of which allows for primary data collection. Such data are not publicly available and without this information collection, certain aspects of the Commission's analysis of the impact of the ROOs will be less robust in, or absent from, its report. This is a one-time collection for such data for use in this report and potential use in the three subsequent reports required by the USMCA Implementation Act.

16. Project plan and schedule

After receiving completed questionnaires, Commission staff will review and edit each response for accuracy, resolve any questions with the respondent, and tabulate the responses. Data will be analyzed, compiled in a form that will not reveal the individual operations of any respondent, and prepared for publication. An email providing the link to the online questionnaire is scheduled to be transmitted on or before September 18, 2026. The respondents are requested to respond by 30 days after the link is emailed. Incorporating questionnaire response information, the Commission will deliver a report containing the results of its investigation to the President, the House Committee on Ways and Means, and the Senate Committee on Finance by July 1, 2027.

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[1] The Commission estimates that 2,800 personnel hours (70 personnel weeks) will be spent on the questionnaire (at average wage), which is approximately 22.7 percent of the total personnel hours the Commission budgeted for the study. Personnel costs include two weeks of two full-time staff members to follow up with respondents. This time also includes calls and emails to questionnaire recipients from Commission staff to ensure that firms reply to the questionnaire and that responses received are accurate.

[2] The Commission does not intend to conduct any physical mailings for this survey.

17. Non-display of expiration date

Not applicable, the expiration date appears at the beginning of the Commission questionnaire.

18. Exceptions to certification statement to form OMB 83-I

Not applicable.