

November 12, 2020

The Honorable Robert E. Lighthizer  
United States Trade Representative  
600 17th Street, N.W.  
Washington, D.C. 20508

Docket Numbers: USTR-2020-0036 & USTR-2020-0037

Dear Ambassador Lighthizer:

On behalf of the undersigned organizations and companies below and the millions of American workers we employ, we are writing regarding the initiation of two Section 301 investigations on Vietnam's acts, policies, and practices related to illegal timber and currency valuation. We agree that our trading partners must abide by global trade rules, and we support the administration's efforts to address unfair trading practices. However, the administration has tools other than tariffs to address these concerns. The possible imposition of new punitive duties on U.S. imports from Vietnam will only cause further supply chain disruption during the COVID-19 pandemic. We believe the administration's goal can be achieved without taxing American consumers and American workers.

Vietnam is the second largest supplier of apparel, footwear, and travel goods to the U.S. market and has experienced dramatic growth since 2016. Vietnam has become even more important as U.S. companies have implemented diversification strategies away from China. Imposing new punitive tariffs on U.S. imports from Vietnam would cause extreme disruption, directly threatening those investments and increasing prices for hard-working American families at the register or costs on the supply chains that directly support millions of American jobs.

We remain concerned about the escalation of tariff wars. We know firsthand from the experience with China over the last several years that additional tariffs will have a significant, negative, and long-term impact on American businesses, farmers, families, and the U.S. economy. Broadly applied tariffs are not an effective tool to change a trading partner's unfair trade practices. Tariffs are taxes paid directly by American companies, including those listed below, their American workers, and American consumers.

We do not believe this is the time to impose new costs on U.S. supply chains, particularly on American job creators who are still recovering from the impacts of the COVID-19 pandemic. Further, new punitive tariffs could make it even harder to source the personal protective equipment (PPE) that our communities need to safely regrow the economy.

Therefore, we oppose the imposition of punitive tariffs on U.S. imports from Vietnam. It is time for the administration to take a different approach to trade policy, one that does not punish American consumers, American workers, and the American communities they support.

Thank you for your time and consideration in this matter.

Sincerely,

**Associations**

Accessories Council

National Association of Chemical Distributors

American Apparel & Footwear Association (AAFA)  
American Bridal and Prom Industry Association (ABPIA)  
Consumer Technology Association  
Council of Fashion Designers of America (CFDA)  
Fashion Accessories Shippers Association (FASA)  
Fashion Jewelry and Accessories Trade Association (FJATA)  
Footwear Distributors & Retailers of America (FDRA)  
Gemini Shippers Association  
Halloween Industry Association (HIA)  
International Prom Association (IPA)  
Juvenile Products Manufacturers Association (JPMA)

National Retail Federation (NRF)  
North American Association of Uniform  
Manufacturers and Distributors (NAUMD)  
Outdoor Industry Association (OIA)  
Promotional Products Association International (PPAI)  
Retail Industry Leaders Association (RILA)  
Sports and Fitness Industry Association (SFIA)  
The Toy Association  
Travel Goods Association (TGA)  
U.S. Fashion Industry Association (USFIA)  
U.S. Global Value Chain Coalition (USGVC)

### **Companies**

adidas America, Inc.  
Alfwear Inc.  
Ascena Retail Group, Inc.  
Badcock Home Furniture & more  
BBC International, LLC  
Black Diamond Equipment, Ltd.  
Boulder Gear  
Byer California  
Carhartt  
Centric Brands LLC  
Clearman Labs LLC dba Matador  
Dynafit  
Everlane Inc.  
Formal Approach  
French Toast  
Gap, Inc.  
Goldbug, Inc.  
J. Crew Group, LLC  
Jockey International  
KCP Operating Company, LLC  
Kenneth Cole  
Kuhl  
LaCrosse Footwear, Inc.  
Lanier Apparel  
Lee

Levi Strauss & Co.  
Lilly Pulitzer  
LT Apparel Group  
Mon Cheri Bridals  
Oberalp North America  
Outdoor Gear Inc  
Oxford Industries  
Perry Ellis  
PVH Corp.  
Ralph Lauren  
Randa Apparel & Accessories  
Renfro Corporation  
Salewa  
SanMar Corporation  
Southern Tide  
Spanx, Inc.  
Tapestry  
Tommy Bahama  
TTI GLOBAL RESOURCES  
Vagabond Shoemakers  
Vera Bradley Designs  
VF Corporation  
Vibram Corporation  
W S Badcock Corporation