



Docket Number BIS-2025-0024

XRIN 0694-XC125

Submitted to the Bureau of Industry and Security, Department of Commerce

Via Federal eRulemaking Portal

May 16, 2025

The Japan Automobile Manufacturers Association<sup>1</sup> (JAMA) respectfully submits these comments to the Bureau of Industry and Security (BIS) and the Department of Commerce in response to the April 22, 2025, request for comments on the Section 232 National Security Investigation of Imports of Trucks.

### **Overview**

Since 1982 JAMA members have cumulatively invested over \$66 billion in their U.S. manufacturing operations and nearly \$4.6 billion in cumulative research and development (R&D) capital investments since 1977. Over a 40-plus year history in the United States, these investments have spread across 27 states to 24 manufacturing facilities, 45 R&D and design facilities, and 69 distribution centers. Japanese-brand automakers' investments support over 2.2 million U.S. jobs<sup>2</sup> and represent significant and ongoing contributions to the U.S. economy and automotive industry. Additionally, JAMA truck manufacturing members started truck production in 2004, and they continue to manufacture, sell and service medium- and heavy-duty trucks, in the U.S. market. Their cumulative U.S. investment in manufacturing totals over \$1.5 billion and they directly employ nearly 2,500 U.S. workers.

U.S. truck manufacturing is critical to a strong and stable supply chain. JAMA members are proud contributors to this system, both in their U.S. investments as well as the high-quality and reliable products they offer to U.S. businesses.

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<sup>1</sup> JAMA is a nonprofit industry association that comprises Japan's 14 manufacturers of passenger cars, trucks, buses, and motorcycles. JAMA's membership includes Daihatsu Motor Corporation, Hino Motors, Honda Motor Corporation, Isuzu Motors Limited, Kawasaki Motors, Mazda Motor Corporation, Mitsubishi Motors Corporation, Mitsubishi Fuso Truck and Bus Corporation, Nissan Motor Corporation, Subaru Corporation, Suzuki Motor Corporation, Toyota Motor Corporation, UD Trucks Corporation, and Yamaha Motor Corporation

<sup>2</sup> The Contributions of Japanese-brand Automakers to the United States Economy, Dr. Thomas Prusa (<https://www.jama.org/the-contribution-of-the-japanese-branded-automotive-industry-to-the-united-states-economy-may-2023/>) (May 16, 2023) (accessed May 16, 2025).

While JAMA members' retail sales volume is limited, they still hold about 5% share of the U.S. medium-duty truck market, which plays a vital role in social infrastructure and support the lives and livelihoods of everyday Americans. In 2024, JAMA members' U.S. local production of medium and heavy-duty trucks totaled 20,611 units, up 30% from 2014. The volume of these trucks exported from Japan to the U.S. in 2024 stood at 13,251 units, representing a decline of nearly 70% compared to its peak in 2006.

Along with the economic impact from their ongoing U.S. operations, JAMA members also exemplify the good-quality nature of their investments through the continued support of the communities they operate in, engagement in innovative research partnerships with universities and development of the U.S. workforce.

### **Essential Roles of Trucks and Commitment to U.S. Commercial Customers**

JAMA members that assemble and sell a wide range of mainly medium and some heavy-duty trucks play an essential part in supplying and servicing a variety of U.S. trucking needs, from mid- to long-distance transport to last-mile deliveries. Being able to provide reliable and value-driven products, ensures a stable supply of trucks ensuring that items such as food, medicine/medical goods, consumer goods and industrial materials reach every corner of the U.S.

During the COVID-19 pandemic, multiple supply chains experienced shocks and shortages. Throughout this challenging time JAMA members played critical roles in maintaining essential logistics and supporting frontline efforts. Additionally, commercial customers are looking for value and reliability in the trucks they purchase since they are running businesses and therefore a truck's performance and maintenance costs factors into overall productivity and profitability. JAMA truck manufacturing members have continued their efforts to fulfill the needs of U.S. commercial customers. These members are committed to the U.S. market as their investments detailed above indicate and, therefore, are instrumental in enhancing U.S. national and economic security by continuing to produce and service trucks that U.S. businesses depend on.

### **Factors to Consider for Continued Growth in U.S. Truck Manufacturing**

JAMA members' growing U.S. investments help support and advance the domestic trucking industry- a critical part of the U.S. economy. They have and will continue to have an increasing focus on U.S. manufacturing. Growth in the truck manufacturing sector takes time to ensure sustainable operations. Since trucking is directly tied to business activity and therefore to larger macroeconomic dynamics, flexible production planning is necessary, and in some cases longer timelines are needed to achieve production and sales targets. An introduction of tariffs as a

possible result of the current investigation would not only add to production costs and challenge production timelines, but could lead to increased logistics costs, which in turn may result in a rise in overall prices, potentially adversely affecting the everyday lives of Americans.

### **Conclusion**

JAMA members' consistent and steadily increasing good-quality investments in the U.S. underscore their long-term commitment to the U.S. market, workers and communities. JAMA's truck manufacturing members strongly urge the U.S. to support policies that encourage continued growth in the U.S. Possible tariff measures in response to this investigation would add costs and decrease the momentum in U.S. truck manufacturing as downside price increases would generate a negative outcome for commercial customers who are primarily concerned with increased costs to their (U.S.) business. JAMA respectfully submits the comments above for consideration and welcomes further engagement and dialogue on these critical matters.