

## ***VDA DRAFT Submission, as on May 16, 2025***

# **Public Comment on Section 232 National Security Investigation of Imports of Trucks**

Docket (BIS-2025-0024)

<https://www.regulations.gov/document/BIS-2025-0024-0001>

On April 22, 2025, the Secretary of Commerce initiated an investigation to determine the effects on the national security of imports of medium-duty trucks, heavy-duty trucks, and medium- and heavy-duty truck parts, and their derivative products.

This investigation has been initiated under section 232 of the Trade Expansion Act of 1962, as amended (Section 232). Interested parties are invited to submit written comments, data, analyses, or other information pertinent to the investigation to the Department of Commerce's (Department) Bureau of Industry and Security (BIS), Office of Strategic Industries and Economic Security. This notice identifies issues on which the Department is especially interested in obtaining the public's views.

**DATES:** Comments may be submitted at any time but must be received by May 16, 2025.

**ADDRESSES:** Comments on this notice may be submitted to the Federal rulemaking portal at: [www.regulations.gov](http://www.regulations.gov). The *regulations.gov* ID for this notice is BIS-2025-0024. Please refer to XRIN 0694-XC125 in all comments.

All filers using the portal should use the name of the person or entity submitting the comments as the name of their files, in accordance with the instructions below. Anyone submitting business confidential information should clearly identify the business confidential portion at the time of submission, file a statement justifying nondisclosure and referring to the specific legal authority claimed, and provide a non-confidential version of the submission.

For comments submitted electronically containing business confidential information, the file name of the business confidential version should begin with the characters "BC." Any page containing business confidential information must be clearly marked "BUSINESS CONFIDENTIAL" on the top of that page. The corresponding non-confidential version of those comments must be clearly marked "PUBLIC." The file name of the non-confidential version should begin with the character "P." Any submissions with file names that do not begin with either a "BC" or a "P" will be assumed to be public and will be made publicly available at: <https://www.regulations.gov>.

### **FOR FURTHER INFORMATION CONTACT:**

Stephen Astle, Director, Defense Industrial Base Division, Office of Strategic Industries and Economic Security, Bureau of Industry and Security, U.S. Department of Commerce (202) 482-2533, [trucks232@bis.doc.gov](mailto:trucks232@bis.doc.gov). For more information about the Section 232 program, including the regulations and the text of previous investigations, see [www.bis.doc.gov/232](http://www.bis.doc.gov/232).

SUPPLEMENTARY INFORMATION:

**Background**

On April 22, 2025, the Secretary of Commerce initiated an investigation under Section 232 (19 U.S.C. 1862) to determine the effects on national security of imports of medium-duty trucks, heavy-duty trucks, and medium- and heavy-duty truck parts, and their derivatives.

The term “medium-duty trucks” means trucks with a gross vehicle weight of more than 10,000 and under 26,001 pounds. The term “heavy-duty trucks” means trucks with a gross vehicle weight rating of 26,001 pounds or more. For the purposes of this investigation, trucks are motor vehicles for the transport of goods. The term “medium- and heavy-duty truck parts” refers to the individual components and systems of medium- and heavy-duty trucks, including engines and engine parts, transmissions and powertrain parts, and electrical components. Hereafter, “medium-duty trucks,” heavy-duty trucks,” and “medium- and heavy-duty truck parts” shall be referred to collectively as “trucks and truck parts.”

**Request for Public Comments**

This investigation is being undertaken in accordance with part 705 of the National Security Industrial Base Regulations (15 CFR parts 700 to 709) (NSIBR). Interested parties are invited to submit written comments, data, analyses, or information pertinent to this investigation to BIS's Office of Strategic Industries and Economic Security no later than May 16, 2025. The Department is particularly interested in comments and information directed at the criteria listed in § 705.4 of the regulations as they affect national security, including the following:

- (i) The current and projected demand for trucks and truck parts in the United States;
- (ii) The extent to which domestic production of trucks and truck parts can meet domestic demand;
- (iii) The role of foreign supply chains, particularly of major exporters, in meeting United States demand for trucks and truck parts;
- (iv) The concentration of United States imports of trucks and truck parts from a small number of suppliers and the associated risks;
- (v) The impact of foreign government subsidies and predatory trade practices on the competitiveness of the medium- and heavy-duty truck industry in the United States;
- (vi) The economic impact of artificially suppressed prices of trucks and truck parts due to foreign unfair trade practices and state-sponsored overproduction;
- (vii) The potential for export restrictions by foreign nations, including the ability of foreign nations to weaponize their control over supplies of trucks and truck parts;
- (viii) The feasibility of increasing domestic capacity for trucks and truck parts to reduce import reliance;
- (ix) The impact of current trade policies on domestic production of trucks and truck parts, and whether additional measures, including tariffs or quotas, are necessary to protect national security; and
- (x) Any other relevant factors.

Material submitted by members of the public that is business confidential information will be exempted from public disclosure as provided for by § 705.6 of the regulations (see the ADDRESSES section of this notice). Communications from agencies of the United States Government will not be made available for public inspection. BIS does not maintain a separate public inspection facility.

Requesters should first view the Bureau's web page, which can be found at: <https://efoja.bis.doc.gov/> (see “Electronic FOIA” heading). If requesters cannot access the website, they may call (202) 482-0795 for assistance. The records related to this assessment are made accessible in accordance with the regulations published at 15 CFR 4.1, *et seq.*

Eric Longnecker,  
Deputy Assistant Secretary for Technology Security.

[FR Doc. 2025-07260 Filed 4-23-25; 4:15 pm]

BILLING CODE 3510-33-P

## VDA Submission

### A. The German Automotive Industry's Commitment to the US Economy

#### Summary

VDA appreciates the opportunity to provide these comments. The German automotive industry supports the overall objective of the America First Trade Policy to secure stable supply chains, to foster economic growth and to promote investment and technological leadership. However, VDA members are convinced that these objectives are best achieved through a further dismantling of tariffs and non-tariff barriers rather than through increase of trade barriers that could spur inflation and have many unintended consequences.

We kindly suggest implementing policies that will continue to make the United States and North America a destination for international investment and cooperation. Instead of discussing additional barriers, VDA calls upon the US Administration to engage in joint efforts with the EU to reduce tariffs and trade barriers. This is essential for further investment and jobs in the US.

#### **Commercial vehicle trade with Germany with positive impact on the US**

The transatlantic partnership and free and fair trade are of great economic importance for both sides and a guarantee of growth, prosperity and jobs on both sides of the Atlantic.

The German automotive industry has been present and successful in the US for decades. The US is an **important part of the German automotive industry's production network**, and the global market is also served from there.

In 2024, German manufacturers produced more than 844.000 vehicles in the US. Of them around **half are exported all over the world**. The US as an automotive location therefore also benefits from international trade and the commitment of the German automotive industry.

In 2024 German **exports of Commercial Vehicles** to the US amounted to 1,2 bn USD only. These figures show that there is no threat to the US economy.

Also, the **exports of parts** for commercial vehicle production in the USA do not constitute a threat to the US but supports the US Industry in building commercial vehicles. Parts coming from Germany are an important success factor for American built vehicles.

Additional tariffs in the CV-sector would be counterproductive to the goals of the US Government to support the US-industry and its citizens.

Tariffs would burden a sector which plays a pivotal role in driving economic growth through transportation of goods, maintaining supply chains, and supporting trade. Investment in commercial vehicles often leads to infrastructure development, such as improvements in roads, bridges, and ports, enhancing connectivity and supporting broader economic activities.

Many industries, including agriculture, construction, and retail, rely heavily on commercial vehicles for their operations, meaning the efficiency and reliability of these vehicles directly impact the productivity and growth of these sectors.

The commercial vehicle sector stimulates economic activity through its demand for raw materials, parts, and services, creating a multiplier effect where spending in one area leads to increased economic activity in others. Additionally, the sector drives technological advancements, such as

improvements in fuel efficiency, safety features, and autonomous driving technologies, which can lead to broader economic benefits and environmental sustainability.

At the same time, the commercial vehicle sector is extremely cost-sensitive and driven by total cost of ownership which is why additional cost through tariffs could have a negative impact beyond the sector itself.

## **Employment and Investments**

In the US, the German automotive companies directly **employ around 138,000 people**. Of these, 48,000 work for the automobile manufacturers and another 90,000 for German suppliers.

If the indirect effects are added there is a multiplier of 10.1 for manufacturing jobs and 1.84 for dealer jobs according to the Center for Automotive Research<sup>1</sup>. Thus, German OEM and suppliers alone account for **approx. 1.4 mn jobs in the US** economy.

## **Commercial Vehicles**

The German Automotive industry delivers high quality products into the US economy and commercial vehicle industry. This is true for vehicles and parts like axles, crankshafts and engines.

## **German Suppliers contribute to US Industry**

According to an analysis by DUN & BRADSTREET done for VDA (DATA 2022), German suppliers have **more than 2.000 production sites in the USA**.

German suppliers have made high **investments** in the USA in recent decades and ensure resilience and short logistics routes for local producers.

In addition to German OEMs, German suppliers also deliver to **US companies** and have established very substantive, reliable and efficient business relationships with them.

German suppliers make a major contribution to **research and development** as well as **innovations** in the USA.

## **Mutual Trade and Investment relations**

Thus, there is no doubt that the mutual trade and investment relations are extremely important to the automotive industry in Germany as well as to the industry in the US - and any change in the framework conditions affects the economic situation of our industry.

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<sup>1</sup> This Analysis is based on the DATA DRIVEN Report of the Alliance for Automotive innovation, which refers to analyses by the Center for Automotive Research, an independent nonprofit research organization. The multipliers result from Appendix C, see page 43. [Alliance for Automotive Innovation - DATA DRIVEN Report \(January 2025\).pdf](#). (Center for Automotive Research | An independent nonprofit research organization).

## B. VDA Comments on Reciprocal Trade Relations

The German automotive industry supports the overall objective of the America First Trade Policy to secure stable supply chains, to foster economic growth and to promote investment and technological leadership. However, VDA members are convinced that these objectives are best achieved through a further dismantling of tariffs and non-tariff barriers rather than through tariff increase that could spur inflation and have many unintended consequences.

### Import tariffs in EU-US trade

Import tariffs in %	Passenger cars	Light commercial vehicles/ Pick-Ups	Heavy commercial vehicles	Parts
EU	10	10/22*	22	2-5
US	2.5	25	25	0-2.5

\* Depending on engine type, weight and displacement capacity

Source: European commission

## C. VDA Recommendations: Mutually beneficial agreement

In view of this and with regard to the current discussions on potential EU countermeasures against additional US tariffs directed against goods from the EU, VDA recommends:

1. The EU and the US should agree on a trade deal that is mutually beneficial for both sides.
2. The German automotive industry continues to advocate for negotiations for a bilateral industry agreement between the US and the EU. This would provide a forum for discussing the various tariffs and non-tariff barriers on automotive products and could result in a more balanced approach. For example, the USA levies an import duty of 25% on popular pick-up trucks.
3. The automotive industry would also welcome talks on regulatory cooperation, standards and certification – this would bring benefits for both sides of the Atlantic and would increase efficiency on both sides.
4. An agreement could also include other industry sectors.

VDA appreciates the opportunity to provide these comments. We kindly suggest to implement policies that will continue to make the United States and North America a destination for international investment and cooperation. Instead of discussing additional tariffs, VDA calls upon the US Administration to engage in joint efforts with the EU to reduce tariffs and trade barriers. This is essential for further investment and jobs in the US. Export success and imports are complementary and simply the two sides of economic success.

## Annex: More Information on the Engagement of the German Automotive Industry in the US

### **The German Manufacturers and German Suppliers...**

1. ... create ten thousands of Jobs in the US.
2. ... have a huge impact on the regional economies around their production facilities.
3. ... build many top end models in the US.
4. ... have quadrupled vehicle production in the US between 2009 and 2016, 2023 highest production ever.
5. ...are the biggest car exporters of the US. They sell more than half of their production outside the US.
6. ... have become increasingly important for the production location US.
7. ... produce far more vehicles locally in the US than they import from Germany.
8. ... have more than 2,000 production facilities in the US.
9. ...German investors create impact coming from R&D activities, the supply chain, the indirect impact on employment, repair services, dealers and finally financial service companies
10. ...German Automotive companies invest in training and skill development and engage socially
11. ...German companies are pioneers and relentless innovators in the US. German companies have filed hundreds of technology patents in the US.
12. ...German OEM and suppliers pursue a strategy of working with technology and mobility companies to accelerate the development of new products and technologies
13. ... German OEMs are at the forefront of better preparing the American public for safety awareness with automated vehicles, connected vehicles, safety solutions for vulnerable road users, and more.

## About VDA

The German Association of the Automotive Industry (VDA) consists of more than 600 companies involved in production for the automotive industry in the Federal Republic of Germany.

The members are divided into three manufacturer groups automobile manufacturers, automotive suppliers, and trailers, special bodies, buses.

VDA represents all in all around more than 700.000 employees. The cooperation between manufactures and suppliers in the VDA is unique in the world of motoring.

VDA cooperates closely with its European and international partner organizations as ACEA, CLEPA, OICA and national automotive associations.

VDA is the Organizer of the IAA (International Motor Show). IAA attracts the entire automotive world to Munich (PC) and Hannover (CV).

President Hildegard Müller heads the VDA which has its headquarters in Berlin.

Published by German Association of the Automotive Industry (VDA)  
Behrenstrasse 35, D-10117 Berlin  
[www.vda.de](http://www.vda.de)  
German Bundestag Lobby Register No.: R001243  
EU-Transparency-Register-No.: 9557 4664 768-90

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Last revised March 11, 2025