



April 11, 2022

Colette Morgan,
Director for Southeast Asia and the Pacific
United States Trade Representative
600 17th Street, NW
Washington, DC 20508

Re Comments Regarding Fair and Resilient Trade Pillar

Dear Director Morgan,

The American Association of Exporters and Importers (AAEI) has been a national voice for the international trade community in the United States since 1921. AAEI represents the entire spectrum of the international trade community across all industry sectors. Our members include manufacturers, importers, exporters, wholesalers, retailers, and service providers to the industry, which is comprised of customs brokers, freight forwarders, trade advisors, insurers, security providers, transportation interests, and ports. Many of these enterprises are small businesses seeking to export to foreign markets. AAEI promotes fair and open trade policy. We advocate for companies engaged in international trade, supply chain security, export controls, non-tariff barriers, import safety, and other movement of good's issues.

AAEI supports the Biden Administration's current efforts to explore the development of an Indo-Pacific Economic Framework to deepen economic relations in the Indo-Pacific region. We believe that the significant challenges for U.S. exporters seeking to deliver their products to foreign markets affordably and dependably necessitates the Administration's focus on "fair and resilient trade," specifically with trade facilitation.

AAEI believes the World Trade Organization's (WTO) Trade Facilitation Agreement and the United States-Mexican-Canada Agreement's (USMCA) Chapter 7 on Customs Administration and Trade Facilitation serves as a good starting point to drive high-standard commitments and new approaches to trade facilitation.

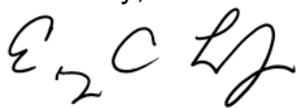
AAEI would like to highlight specific commitments under the USMCA that should be reflected in any Indo-Pacific Economic Framework:

- Each party should apply its customs procedures related to the importation, exportation, and transit of goods in a manner that is transparent, predictable, and consistent throughout its territory.
- Each party should make recommendations for the robust exchange of information between and among the agreement's parties.
- Each party should publish, in advance, regulations governing trade and customs matters.
- Each party should adopt or maintain a mechanism to regularly communicate with traders within its territory of its procedures related to the importation, exportation, and transit of goods.
- Each party should automate all customs processes, especially as it relates to enforcement actions.
- Each party should, through its customs administration, issue a written advance ruling, prior to the importation of a good into its territory.
- Each party should adopt or maintain simplified customs procedures for the efficient release of goods in order to facilitate trade between parties.
- Each party should adopt or maintain procedures that provide for the release of goods prior to a final determination and payment of any customs duties, taxes, fees, and charges imposed on or in connection with importation of goods.

In addition, AAEI agrees with many other members of the trade community that export control must be more aligned with our trade partners. With export controls being utilized more expansively by governments to respond to global national security challenges, it is critical that regional allies and partners remain aligned on export controls.

In summary, there are several opportunities to build on the WTO's Trade Facilitation Agreement and USMCA to help drive Indo-Pacific competitiveness and accelerate access for U.S. goods in that region. We look forward to working with USTR to address "fair and resilient" trade facilitation.

Sincerely,



Eugene C. Laney
American Association of Exporters and Importers
President and CEO