

August 7, 2020

Section 232 Mobile Crane Investigation  
Docket Number: BIS-2020-0009  
Industrial Studies Division  
Bureau of Industry and Security  
U.S. Department of Commerce  
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VIA ELECTRONIC SUBMISSION:

<https://www.regulations>

RE: Follow-Up/Rebuttal Comments on Section 232 Mobile Crane Investigation – Specialized Carriers & Rigging Association

Dear Sir/Madam:

The Specialized Carriers & Rigging Association (“SC&RA”) submits these written comments in follow-up to our July 9, 2020 comments regarding the U.S. Department of Commerce’s Section 232 National Security Investigation of Imports of Mobile Cranes.

SC&RA is an international trade association of more than 1,400 member companies from 46 nations, headquartered in Centreville, Virginia. We believe it is important to clarify that of these 1,400 companies, SC&RA represents the interests of just over 1,000 member companies domiciled in the United States. These U.S. based, SC&RA member companies employ approximately 55,000 individuals, including all levels of management and skilled labor.

Many of SC&RA’s members are small businesses, and some are large private and public companies. SC&RA’s Board of Directors consists of 37 business owners or senior managers who represent companies that serve very dynamic American industries essential to the U.S. economy, infrastructure and national security. We believe it is also important to note, as it pertains to this Section 232 investigation, SC&RA’s Board of Directors unanimously voted to support U.S. laws and policies that promote free and fair trade without overextending rules that unfairly limit trade or unnecessarily introduce burdensome taxes and tariffs.

The Specialized Carriers & Rigging Association appreciates the efforts of the Commerce Department to conduct a thorough and balanced investigation on this matter. If in the process of the investigation, the Department of Commerce determines it would be beneficial to hold hearings to enable the petitioner and other interested parties to further comment and address relevant questions, SC&RA would assist in any appropriate way.

Respectfully submitted,

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Joel M. Dandrea  
Chief Executive Officer  
Specialized Carriers & Rigging Association