

June 16, 2026

VIA ELECTRONIC SUBMISSION AND U.S. MAIL

The Honorable Howard Lutnick

Secretary of Commerce

U.S. Department of Commerce

1401 Constitution Avenue NW, Washington, DC 20230

Re: Further Tariff Relief for Cranes and High-Tensile Steel (Extension of Annex I-C 15% Section 232 Relief to Tower and Crawler Cranes (HTSUS 8426.20.00, 8426.49.00, and 8426.99.00), and Exemption for Imported High-Tensile Crane Steel)

Dear Secretary Lutnick:

The Specialized Carriers & Rigging Association (“SC&RA”) represents thousands of crane importers, U.S. manufacturers, and end users. Without their work, major construction of energy, transportation, defense, artificial-intelligence data center, and other critical projects across the United States would be severely delayed or brought to a halt. That work depends on the specialized cranes our members import as high-quality finished products from our allies, and on the high-tensile steel that must likewise be imported from those allies to domestically build and fabricate cranes that are safe and reliable.

On behalf of SC&RA, we write first to thank you and President Trump for the tariff-regime adjustments announced in the June 1, 2026, Proclamation and accompanying Fact Sheet, *“Further Adjusting the Tariff Regimes for Imports of Aluminum, Steel, and Copper Into the United States”* (the “June 1 Proclamation”), which provided relief for the importation of mobile cranes by setting the applicable rate at 15 percent through December 31, 2027, and hopefully beyond. We greatly appreciate your recognition of the vital role cranes play in building America and sustaining a strong economy. The June 1 Proclamation built on the steel tariff adjustments made in the April 2, 2026, Proclamation and accompanying Fact Sheet, *“Strengthening Actions Taken to Adjust Imports of Aluminum, Steel, and Copper into the United States”* (the “April 2 Proclamation”).

The June 1 Proclamation, however, continues to treat different types of cranes differently for reasons that are not apparent. Mobile cranes received the reduced 15 percent rate under Annex I-C (HTSUS 8705.10.00), while tower cranes (HTSUS 8426.20.00) and crawler cranes (HTSUS 8426.49.00 and 8426.99.00) remain tariffed at 25 percent under Annex I-B. These cranes are every bit as essential to our industry as the mobile cranes that received relief, and the relevant subheadings can readily be incorporated into Annex I-C at the same 15 percent rate, which we respectfully request.

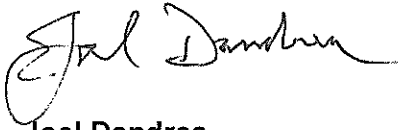
Several considerations support treating these cranes alike:

1. **Functional equivalence.** Tower and crawler cranes perform the same essential heavy lifting work as the mobile cranes already granted relief. On any given project, the choice among crane types turns on site conditions, ground bearing, reach, and lift geometry—not on any difference in kind. There is no functional basis for taxing one configuration ten percentage points more heavily than another that does the same job.
2. **Recognized industrial equipment.** The American Society of Mechanical Engineers classifies mobile, tower, and crawler cranes alike as heavy industrial lifting equipment, governing their design, operation, and maintenance under the ASME B30 standard. All three, therefore, qualify as industrial equipment within the meaning of the Fact Sheet accompanying the April 2 Proclamation and should be treated consistently under it.
3. **The omission appears to be a classification artifact.** Annex I-C is built on a specific list of enumerated HTSUS subheadings, and for every other major category of mobile industrial equipment it captured both track-laying (aka “crawler”) and wheeled variants—for example, track-laying and wheeled bulldozers (8429.11.00 and 8429.19.00), front-end shovel loaders other than wheel-type (8429.51.50), and track-laying non-agricultural tractors (8701.30.50). Cranes are the sole category in which the heading covering self-propelled and other cranes (8426) was omitted while the corresponding wheeled mobile cranes (8705.10.00) received relief. The disparity thus appears to follow from which subheadings were enumerated, rather than from any considered judgment that tower and crawler cranes differ in kind from the cranes that received relief.
4. **These cranes are indispensable to the industrial renaissance this Administration is overseeing.** The heaviest lifts on the projects driving that renaissance are performed almost exclusively by large tower and lattice-boom crawler cranes: the semiconductor fabrication plants reshoring advanced chip production; the hyperscale data centers underpinning U.S. leadership in artificial intelligence; domestic mining and critical-minerals development; petrochemical and refining capacity; the full range of energy projects, from LNG and power generation to grid modernization and nuclear infrastructure; and the rebuilding of the nation’s aging bridges, ports, and transmission systems. These facilities cannot be built without the tower crane and crawler crane capacity that mobile cranes alone cannot provide. Taxing the very equipment on which this build-out depends is squarely at odds with the policy the reduction was enacted to serve.

Separately, we respectfully request relief on a critical input to these cranes. Certain of our member companies are actually manufacturing and fabricating some types of these cranes in the United States. (However, they cannot meet Renaissance demand.) The high-tensile steel required for the load-bearing components on which the safety and reliability of these cranes depend is of a grade that is not produced in the United States and must be sourced from allies in Japan and Europe. Our request is not directed at the general raw steel used in cranes, but specifically at this unique high-tensile steel, which is unavailable domestically. We ask that it be exempted from tariffs, so that the cost and availability of safe, reliable cranes essential to American construction are not compromised.

We thank you again for the relief already extended to mobile cranes in the June 1 and April 2 Proclamations, and for your consideration of these two further requests—extending the 15 percent Annex I-C rate to tower and crawler cranes and exempting the specialty high-tensile steel required for the domestic production of these cranes. We would welcome the opportunity to meet with you and your colleagues at the Department of Commerce to discuss the basis for these requests in greater detail.

Sincerely,

A handwritten signature in black ink, appearing to read "Joel Dandrea". The signature is fluid and cursive, with the first name "Joel" being more prominent than the last name "Dandrea".

Joel Dandrea
Chief Executive Officer
Specialized Carriers & Rigging Association

cc: The Honorable Jamieson Greer, United States Trade Representative