



Docket ID: USTR-2018-0026

Agency: Office of United States Trade Representative (USTR)

Parent Agency: Executive Office of the President (EOP)

August 9, 2018

RE: Request for public comment on proposed modification of action pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation

The ATM Industry Association (ATMIA) is a global, non-profit trade association representing all ATM industry stakeholders, with more than 10,000 members from about 700 organizations in 66 countries. About 300 of those organizations are based in the United States. Established in 1997, ATMIA has authored more than 30 different best practices manuals on a variety of ATM topics, offers members access to an ATM operations learning platform, hosts numerous committee groups to address industry issues and keep members informed, and advocates for the industry as a whole.

Businesses that purchase and operate ATMs make up nearly 40% of our membership. Many of those operators are small businesses, such as convenience stores, restaurants, hotels, and a broad range of retail merchants. In fact, independent (non-bank) ATM deployers (IADs) now account for an estimated 66% of all U.S. ATMs.

ATMIA supports free trade and the elimination of tariffs which thwart free trade and damage businesses and jobs in sectors adversely affected by the direct and knock-on effects of tariffs. True competition thrives when markets are allowed to operate freely with minimal interference from governments.

In the instance of Automated Teller Machines, the proposed tariffs disproportionately impact small businesses. These operators tend to purchase lower cost, retail cash dispensers, which will incur significant price increases. IADs, which operate the majority of ATMs in America, already operate in an industry with very thin margins – in the range of 6 - 7%. The proposed tariff (USTR-2018-0026, which includes HTSUS Code 8472.90.1000, defined as ATM units) would tighten those margins even further

August 9, 2018

ATMIA comment on USTR-2018-0026

Page Two

and could result in the removal of ATMs from many retail locations, negatively impacting consumer access to cash and small businesses dependent on having ATMs nearby.

ATMIA encourages the Administration of President Trump to delay the implementation of these tariffs for the foreseeable future, while negotiations continue for a more equitable trading framework between the U.S. and China. ATMIA and its members stand ready to provide further input on these and other related issues.

Most sincerely,

A handwritten signature in blue ink, appearing to read "David Tente", with a long horizontal flourish extending to the right.

David N. Tente

Executive Director, USA

The ATM Industry Association (ATMIA)

david.tente@atmia.com