

July 15, 20XX

Chairman  
Committee for Statistical Annotation of Tariff Schedules  
U.S. International Trade Commission  
500 E Street, SW  
Washington, DC 20436

Re: Section 484(f) Request for Statistical Breakout Under HTS 4201.00.30

Dear Committee Chairman:

On behalf of Bow Wow Manufacturing Company, Inc. of Canine, Virginia, we hereby request that the Committee for Statistical Annotation of Tariff Schedules, also known as the 484(f) Committee, create a new statistical annotation in the Harmonized Tariff Schedule of the United States (HTS) for dog collars and leashes under HTS 4201.00.30.

Bow Wow is a domestic producer of dog collars and leashes. A surge in pet ownership in recent years has been accompanied by a growing volume of imports of dog collars and leashes. We are seeking the creation of a new 10-digit statistical reporting number in HTS 4201.00.30 that would separately report imports of dog collars and leashes from other imported dog equipment. This would facilitate monitoring of imports of these particular products and provide data which would be extremely useful to the domestic industry.

#### **A. Background**

A dog collar is a strap or band placed around a dog's neck. Collars can be decorative as well as functional by providing a place to attach a leash and to put emergency contact and pet identification information. A dog leash is a rope or similar item attached to a dog's collar, harness or halter for the purpose of controlling a dog.



dog collar



retractable dog leash



standard dog leash

Dog collars and leashes are currently classified in the HTS as follows:

HTS Heading/Subheading	Stat Suffix	Article Description	Unit of Quantity
4201.00		Saddlery and harness for any animal (including traces, leads, knee pads, muzzles, saddle cloths, saddle bags, dog coats and the like), of any material	
4201.00.30	00	Dog leashes, collars, muzzles, harnesses and similar dog equipment	No.

## B. Requested Change

HTS subheading 4201.00.30 provides for dog leashes, collars, muzzles, harnesses and similar dog equipment. This aggregation of goods prevents the domestic industry from separate analysis of price and volume trends in imports of dog leashes and collars. We propose the following modifications to HTS 4201.00.30 to distinguish imports of dog collars and leashes from the other dog equipment classified in this subheading:

HTS Heading/Subheading	Stat Suffix	Article Description	Unit of Quantity
4201.00		Saddlery and harness for any animal (including traces, leads, knee pads, muzzles, saddle cloths, saddle bags, dog coats and the like), of any material	
4201.00.30		Dog leashes, collars, muzzles, harnesses and similar dog equipment	
	aa	Dog collars and leashes	No.
	bb	Other	No.

As discussed above, adding this new statistical reporting number to the HTS would allow the domestic industry and other interested parties to analyze price and volume trends in imports of dog collars and leashes. This would be extremely useful, as the current level of detail in the HTS does not make it possible to separately identify these articles.

## C. Trade

At present, there is limited information on U.S. imports of dog collars and leashes. The level of trade in subheading 4201.00.30, which covers a wide range of products, far exceeds the 484(f) Committee's

\$1 million threshold. The value of U.S. imports rose from \$217.5 million in 2017 to \$326.9 million in 2022. China has been the primary source of imports, with Vietnam, Cambodia and Germany increasing their shares of the import market during this time period. The creation of a new 10-digit statistical reporting number for dog collars and leashes will permit the collection of import information that is specific to these products.

Many foreign producers export dog collars and leashes to the United States and there are multiple U.S. importers. Bow Wow is aware of the companies listed below that import dog collars and leashes. This is not an exhaustive list; there are likely other importers. Since there are more than three U.S. importers of these products, granting this annotation request should not present any disclosure issues.

Importer A + address

Importer B + address

Importer C + address

Importer D + address

Importer E + address

Importer F + address

#### **D. Other Factors**

Additionally, we submit that this request is administrable by U.S. Customs and Border Protection. It should not pose a burden to importers, as this information should be readily available from invoices and other trade documents.

For the foregoing reasons, we respectfully request that, pursuant to Section 484(f) of the Tariff Act of 1930, as amended (19 U.S.C. § 1484(f)), the 484(f) Committee favorably consider this proposal.

If you require any further information or would like to meet with us to discuss this request in more detail, please contact us. We look forward to working with you on this matter. Thank you.

Sincerely,

Scottie Shepherd  
President & CEO  
Bow Wow Manufacturing Co.