THE USMCA AUTOMOTIVE RULES OF ORIGIN MOTOR VEHICLE PRODUCER QUESTIONNAIRE

U.S. INTERNATIONAL TRADE COMMISSION

USMCAAutoROO@usitc.gov

You are receiving this questionnaire because the U.S. International Trade Commission (Commission or USITC) has identified your firm as a motor vehicle producer in the United States (see "motor vehicle production" in the Definitions/Glossary, which begins on page 5). Your response will be treated as confidential and will be referenced only if we can ensure anonymity.

The information requested by this questionnaire is for use by the Commission in connection with the United States-Mexico-Canada Agreement Implementation Act (19 U.S.C. § 4532(g)(2)) (the Act). The Act requires the Commission to prepare a series of five biennial reports on the economic impact of the automotive rules of origin (ROOs) in the United States-Mexico-Canada Agreement (USMCA), and to provide those reports to the President, the House Committee on Ways and Means, and the Senate Committee on Finance. The first of the reports was delivered on June 30, 2023, with four additional reports due in 2025, 2027, 2029, and 2031. Under 202A(g)(4)(A) of the Act, the Commission shall "solicit information relating to matters that will be addressed in the report." The Commission is conducting a survey of U.S. motor vehicle producers for the 2025 report.

Answers to this questionnaire will provide information about motor vehicle producers for the Commission's factfinding investigation on the economic impact of the USMCA automotive ROOs (Inv. No. 332-600). You can learn more about this investigation at the following website: http://www.usitc.gov/USMCAAutoROO.

Your firm is required by law to respond to this questionnaire.
Please read all instructions and submit your response
to the web-based questionnaire no later than xxx.

OMB number: XXX; Expiration date: XX/XX/XXXX
No response is required if a currently valid OMB control number is not displayed.

The Commission is requesting this information under the authority of section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)). Completing the questionnaire is mandatory, and failure to reply as directed can result in a subpoena or other order to compel the submission of records or information in your possession (19 U.S.C. § 1333(a)).

For more information on this questionnaire, contact the project team at USMCAAutoROO@usitc.gov.

Confidentiality

The Commission has designated the information you provide in response to this questionnaire as "confidential business information," unless such information is otherwise available to the public. The Commission may aggregate the information you provide with information from other questionnaire responses. The Commission will not publish information obtained from your questionnaire or an aggregation of your and other questionnaire responses in a manner that would identify your firm or reveal the operations of your firm. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information which it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information.

Instructions

1. **Accessing and completing the questionnaire**. To provide your firm's response to this questionnaire, use the secure interactive website version, accessible at this link:

   USMCAAutoROO@usitc.gov

   For the purposes of viewing the full questionnaire, a PDF version is available at this link: xx.

   We sent your firm a notification letter that includes a website link and a 10-digit questionnaire token. Type the website link in an internet browser and access the questionnaire for online completion using your 10-digit questionnaire token. If you have issues with your token or accessing the questionnaire, please email USMCAAutoROO@usitc.gov for assistance.

2. **Entering information.** Please answer each question that applies to your firm. Some questions require you to answer by using the provided checkboxes, while others require you to type a response into entry areas. You will have an opportunity to review your responses, edit them, and download a copy before submitting.

3. **Entering numeric data.** Enter data for revenue/sales, employees, etc. in actual units, not in thousands, millions, or other multiples of units. For example, for $123.4 million, enter "123400000," not "123400" or "123.4." (Do not add commas between digits; they will appear automatically after you enter the numbers.)

4. **Questionnaire structure.** This questionnaire is composed of six sections. First, read and respond to section 1 questions carefully. Your responses in section 1 will determine whether you must complete every section that follows.

5. **Submitting the questionnaire.** After you have completed all applicable sections, you may download a copy before submitting. Select the "submit" button to send your final response.

How to report information about your firm

1. **Coordinating your firm's response.** Only one questionnaire per firm may be submitted. If individuals or departments within your firm will share responsibility for completing this questionnaire, please coordinate and combine their responses. This will minimize our need to contact your firm for clarification.

2. **Relationship to corporate structure.** Please provide a single response for your firm's activities and experiences and, to the extent possible, the experiences of its subsidiaries and affiliates.

   If your firm is a holding company without operations, please contact the project team at USMCAAutoROO@usitc.gov for further instruction.

   For U.S. affiliates of foreign companies, please respond as if the affiliate were an independent firm operating in the United States. For example, for an affiliate in the United States, report estimated total U.S. and North American costs for the affiliate and not for the foreign parent company.

Definitions/Glossary

Advanced battery – a battery of a kind used as the primary source for the propulsion of electric passenger vehicles and light trucks. Components include cells, modules/arrays, and assembled packs, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Axle – a drive-axle with differential, whether or not provided with other transmission components, and non-driving axles. Components include axle shafts, axle housings, axle hubs, carriers, and differentials, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Body and chassis – a series of body parts and components that form the chassis frame. Components include major body panels, secondary panels, structural panels, and frames, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Complementary part – a motor vehicle part that is subject to USMCA automotive ROOs (e.g., small electric motor, headlight, and wiring set) that is not a core part or principal part. The HS 2012 subheadings and descriptions for complementary parts are included in the USMCA, Appendix to Annex 4-B, Complementary Parts for Passenger Vehicles and Light Trucks, table C and Complementary Parts for Heavy Trucks, table E.

HS 2012 subheading (passenger vehicles and light trucks)	**Description**
4009.12	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, not reinforced or otherwise combined with other materials, with fittings
4009.22	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined only with metal, with fittings
4009.32	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined only with textile materials, with fittings
4009.42	Tubes, pipes and hoses of vulcanised rubber other than hard rubber, reinforced or otherwise combined with other materials, with fittings
8301.20	Locks of a kind used for motor vehicles
Ex 8421.39	Catalytic converters
8481.20	Valves for oleohydraulic or pneumatic transmissions
8481.30 Check	Check (nonreturn) valves
8481.80	Other taps, cocks, valves and similar appliances, including pressure-reducing valves and thermostatically controlled valves
8501.10	Electric motors of an output not exceeding 37.5 W
8501.20	Universal AC/DC motors of an output exceeding 37.5 W 8501.31 Other DC motors and generators of an output not exceeding 750 W
Ex 8507.20	Other lead-acid batteries of a kind used for the propulsion of motor vehicles of Chapter 87
Ex 8507.30	Nickel-cadmium batteries of a kind used for the propulsion of motor vehicles of Chapter 87

Ex 8507.40	Nickel-iron batteries of a kind used for the propulsion of motor vehicles of Chapter 87
Ex 8507.80	Other batteries of a kind used for the propulsion of motor vehicles of Chapter 87
8511.30	Distributors; ignition coils 8512.20 Other lighting or visual signalling equipment
8512.40	Windshield wipers, defrosters and demisters
Ex 8519.81	Cassette decks 8536.50 Other electrical switches, for a voltage not exceeding 1,000 V
Ex 8536.90	Junction boxes
8539.10	Sealed beam lamp units
8539.21	Tungsten halogen filament lamp
8544.30	Ignition wiring sets and other wiring sets of a kind used in motor vehicles
9031.80	Other measuring and checking instruments, appliances & machines
9032.89	Other automatic regulating or controlling instruments and apparatus

Note: 'Ex' denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

HS 2012 subheading (heavy trucks)	**Description**
8413.50	Other reciprocating positive displacement pumps
Ex 8479.89	Electronic brake systems, including ABS and ESC systems
8482.10	Ball bearings
8482.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.40	Needle roller bearings
8482.50	Other cylindrical roller bearings
8483.20	Bearing housings, incorporating ball or roller bearings
8483.30	Bearing housings, not incorporating ball or roller bearings; plain shaft bearings
8483.60	Clutches and shaft couplings (including universal joints)
8505.20	Electro-magnetic couplings, clutches and brakes
8505.90	Other electro-magnets; electro-magnetic or permanent magnet chucks, clamps and similar holding devices; electro-magnetic lifting heads; including parts

Note: 'Ex' denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

Core part – an engine, transmission, body and chassis, axle, suspensions system, steering system, or advanced battery for passenger vehicles and light trucks, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2. There is no list of core parts for heavy trucks. The HS 2012 subheadings and descriptions for core parts for passenger vehicle and light trucks are included in the USMCA, Appendix to Annex 4-B, Core Parts for Passenger Vehicles and Light Trucks, table A.1, and are:

HS 2012 subheading	**Description**
8407.31	Reciprocating piston engines of a kind used for the propulsion of passenger vehicles of Chapter 87, of a cylinder capacity not exceeding 50 cc
8407.32	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 50 cc but not exceeding 250 cc

8407.33	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 250 cc but not exceeding 1,000 cc
8407.34	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 1,000 cc
Ex 8408.20	Compression-ignition internal combustion piston engines of a kind used for the propulsion of vehicles of subheading 8704.21 or 8704.31
8409.91	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, suitable for use solely or principally with spark-ignition internal combustion piston engines
8409.99	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, other
8507.60	Lithium-ion batteries
8706.00	Chassis fitted with engines, for the motor vehicles of heading 8703 or subheading 8704.21 or 8704.31
8707.10	Bodies for the vehicles of heading 8703
8707.90	Bodies for the vehicles of subheading 8704.21 or 8704.31
Ex 8708.29	Body stampings
8708.40	Gear boxes and parts thereof
8708.50	Drive axles with differential, whether or not provided with other transmission components, and non-driving axles; parts thereof
8708.80	Suspension systems and parts thereof (including shock absorbers)
8708.94	Steering wheels, steering columns, and steering boxes; parts thereof
Ex 8708.99	Chassis frames

Note: 'Ex' denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

Engine – spark-ignition reciprocating or rotary internal combustion piston engine and compression-ignition internal combustion engine (diesel or semi-diesel engine). Components include heads, blocks, crankshafts, crankcases, pistons, rods, and head subassemblies, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Entry into force – the date that the USMCA took effect: July 1, 2020.

Heavy truck – a motor vehicle of subheading 8701.20, 8704.22, 8704.23, 8704.32, 8704.90, or heading 8706,[1] except for a motor vehicle that is solely or principally for off-road use.[2]

Ingot – a block of relatively pure metal.

[1] USMCA, Appendix to Annex 4-B, Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, 4-B-1-1. As defined in the USMCA, a good of heading 8706, for the purposes of this definition, means a chassis fitted with engines for a motor vehicle under subheading 8701.20, 8704.22, 8704.23, 8704.32, 8704.90, except for a motor vehicle that is solely or principally designed for off-road use.

[2] Similar to footnote 1, HS subheading 8704.90 (other trucks) had six new subheadings (8704.41, 8704.42, 874.43, 8704.51, 8704.52, and 8704.60) broken out from it as of the 2022 HS revisions. Products classified under any of these subheadings follow the product-specific ROOs for subheading 8704.90, and are thus also classified as heavy trucks under the USMCA.

Labor value content (LVC) – the share of the value of a motor vehicle or motor vehicle production that is comprised of qualifying labor and other qualifying expenditures, expressed as a percentage. Qualifying labor and LVC requirements in the USMCA automotive ROOs are found in the USMCA, Appendix to Annex 4-B, Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, Article 7.

Light truck – a motor vehicle of subheading 8704.21 or 8704.31, except for a motor vehicle that is solely or principally for off-road use.

Model line – a group of motor vehicles having the same platform or model name.

Motor vehicle – a passenger vehicle, light truck, or heavy truck (on-road vehicles from subheadings 8701.10 through 8701.90,[3] 8702.10, 8702.90, 8703.21 through 8703.90, 8704.10, 8704.21, 8704.22, 8704.23, 8704.31, 8704.32, 8704.90, or heading 8705 or 8706).[4]

Motor vehicle assembly – the process of combining separate constituent parts into a finished motor vehicle, usually along an assembly line.

Motor vehicle production – the manufacturing and assembly of motor vehicles.

Non-originating good or non-originating material – a good or material that does not qualify for duty-free treatment under the USMCA.

Nontraditional motor vehicle input – an input that is historically not uniquely associated with motor vehicles, such as electronic components or electrical inputs, but is still frequently part of the finished motor vehicle.

Onetime overhead cost – a cost that generally does not increase with the number of vehicles produced, also referred to as a fixed cost.

Originating good or **originating material –** a good or material that qualifies as originating under the USMCA.

Passenger vehicle – a motor vehicle of any subheading from 8703.21 through 8703.90.

Party – Canada, Mexico, or the United States.

Platform – a consolidated group of components and systems shared across multiple models (e.g., powertrain, underbody, seat structure, thermal system, etc.).

Principal part – a significant motor vehicle part not included in core parts, including such parts as air conditioners, seats, air bags, and major components of core parts (e.g., transmission shafts, electronic

[3] As discussed in footnote 2, HS subheading 8701.90 (other tractors) was split up into five new subheadings (8701.91, 8701.92, 8701.93, 8701.94, and 8701.95) as of the 2017 HS revisions. Products classified under any of these subheadings follow the product-specific ROOs for subheading 8701.90.

[4] As discussed in footnote 3, a good of heading 8706, for the purposes of this definition, means a chassis fitted with engines for a motor vehicle under subheading 8701.20, 8704.22, 8704.23, 8704.32, 8704.90, except for a motor vehicle that is solely or principally designed for off-road use.

brake systems, and clutches). The HS 2012 subheadings and descriptions for principal parts are included in the USMCA, Appendix to Annex 4-B, Principal Parts for Passenger Vehicles and Light Trucks, table B and Principal Parts for Heavy Trucks, table D, and are:

HS 2012 subheading (passenger vehicles and light trucks)	**Description**
8413.30	Fuel, lubricating or cooling medium pumps for internal combustion piston engines
8413.50	Other reciprocating positive displacement pumps
8414.59	Other fans
8414.80	Other air or gas pumps, compressors and fans
8415.20	Air conditioning machines, comprising a motor-driven fan and elements for changing the temperature and humidity, including those machines in which humidity cannot be separately regulated, of a kind used for persons, in motor vehicles
Ex 8479.89	Electronic brake systems, including ABS and ESC systems
8482.10	Ball bearings
8484.20	Tapered roller bearings, including cone and tapered roller assemblies
8482.30	Spherical roller bearings
8482.40	Needle roller bearings
8482.50	Other cylindrical roller bearings
8482.80	Other ball or roller bearings, including combined ball/roller bearings
8483.10	Transmission shafts (including cam shafts and crank shafts) and cranks
8483.20	Bearing housings, incorporating ball or roller bearings
8483.30	Bearing housings, not incorporating ball or roller bearings; plain shaft bearings
8483.40	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements presented separately; ball or roller screws; gear boxes and other speed changers, including torque converters
8483.50	Flywheels and pulleys, including pulley blocks
8483.60	Clutches and shaft couplings (including universal joints)
8501.32	Other DC motors and generators of an output exceeding 750W but not exceeding 75 kW
8501.33	Other DC motors and generators of an output exceeding 75 kW but not exceeding 375 kW
8505.20	Electro-magnetic couplings, clutches and brakes
8505.90	Other electro-magnets; electro-magnetic or permanent magnet chucks, clamps and similar holding devices; electro-magnetic lifting heads; including parts
8511.40	Starter motors and dual purpose starter-generators of a kind used for spark ignition or compression-ignition internal combustion engines
8511.50	Other generators
8511.80	Other electrical ignition or starting equipment of a kind used for spark-ignition or compression-ignition internal combustion engines
Ex 8511.90	Parts of electrical ignition or starting equipment of a kind used for spark-ignition or compression-ignition internal combustion engines
8537.10	Electric controls for a voltage not exceeding 1,000 V

8708.10	Bumpers and parts thereof
8708.21	Safety seat belts
Ex 8708.29	Other parts and accessories of bodies (including cabs) of motor vehicles (excluding body stampings)
8708.30	Brakes and servo-brakes; parts thereof
8708.70	Road wheels and parts and accessories thereof
8708.91	Radiators and parts thereof
8708.92	Silencers (mufflers) and exhaust pipes; parts thereof
8708.93	Clutches and parts thereof
8708.95	Safety airbags with inflator system; parts thereof
8708.99	Other parts and accessories of motor vehicles of headings 8701 to 8705 (excluding chassis frames)
9401.20	Seats of a kind used for motor vehicles

Note: 'Ex' denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

HS 2012 subheading (heavy trucks)	**Description**
8407.31	Reciprocating piston engines of a kind used for the propulsion of passenger vehicles of Chapter 87, of a cylinder capacity not exceeding 50 cc
8407.32	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 50 cc but not exceeding 250 cc
8407.33	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 250 cc but not exceeding 1,000 cc
8407.34	Reciprocating piston engines of a kind used for the propulsion of vehicles of Chapter 87, of a cylinder capacity exceeding 1,000 cc
8408.20	Compression-ignition internal combustion piston engines of a kind used for the propulsion of vehicles of Chapter 87
8409.91	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, suitable for use solely or principally with spark-ignition internal combustion piston engines
8409.99	Parts suitable for use solely or principally with the engines of heading 8407 or 8408, other
8413.30	Fuel, lubricating or cooling medium pumps for internal combustion piston engines
Ex 8414.59	Turbochargers and superchargers
8414.80	Other air or gas pumps, compressors and fans
8415.20	Air conditioning machines, comprising a motor-driven fan and elements for changing the temperature and humidity, including those machines in which humidity cannot be separately regulated, of a kind used for persons, in motor vehicles
8483.10	Transmission shafts (including cam shafts and crank shafts) and cranks
8483.40	Gears and gearing, other than toothed wheels, chain sprockets and other transmission elements presented separately; ball or roller screws; gear boxes and other speed changers, including torque converters
8483.50	Flywheels and pulleys, including pulley blocks

Ex 8501.32	Other DC motors and generators of an output exceeding 750W but not exceeding 75 kW, of a kind used for the propulsion of motor vehicles of Chapter 87
8511.40	Starter motors and dual purpose starter-generators of a kind used for spark ignition or compression-ignition internal combustion engines
8511.50	Other generators
8537.10	Electric controls for a voltage not exceeding 1,000 V
8706.00	Chassis fitted with engines, for the motor vehicles of heading 8701 through 8705
8707.90	Bodies for the vehicles of heading 8701, 8702, 8704 or 8705
8708.10	Bumpers and parts thereof 8708.21 Safety seat belts
8708.29	Other parts and accessories of bodies (including cabs) of motor vehicles
8708.30	Brakes and servo-brakes; parts thereof
8708.40	Gear boxes and parts thereof
8708.50	Drive axles with differential, whether or not provided with other transmission components, and non-driving axles; and parts thereof
8708.70	Road wheels and parts and accessories thereof
8708.80	Suspension systems and parts thereof (including shock absorbers)
8708.91	Radiators and parts thereof
8708.92	Silencers (mufflers) and exhaust pipes; parts thereof
8708.93	Clutches and parts thereof
8708.94	Steering wheels, steering columns and steering boxes; parts thereof
8708.95	Safety airbags with inflator system; parts thereof
8708.99	Other parts and accessories of motor vehicles of headings 87.01 to 87.05
9401.20	Seats of a kind used for motor vehicles

Note: 'Ex' denotes that only a subset of the HS subheading is covered by the USMCA automotive ROOs.

Regional value content (RVC) – the share of the motor vehicle value based on its transaction value or cost that is made up of originating material, expressed as a percentage. RVC requirements in the USMCA automotive ROOs are found in the USMCA, Appendix to Annex 4-B, Provisions Related to the Product-Specific Rules of Origin for Automotive Goods, Articles 3, 4, and 10.

Rules of origin (ROOs) – the USMCA automotive ROOs as defined in 19 C.F.R. Appendix A to part 182; USMCA, Appendix to Annex 4-B, 4-B-1-1 through 4-B-1-47.

Steering system – the system that controls the movement of a motor vehicle along its vertical axis. Components include steering columns, steering gear/racks, and control units, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Suspension system – the system that connects a motor vehicle to its wheels, allowing for relative motion between the two. Components include shock absorbers, struts, control arms, sway bars, knuckles, coil springs, and leaf springs, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

Tariff classification – the determination of which subheading and/or statistical reporting number a specific good is provided for in the Harmonized System (HS) or Harmonized Tariff Schedule (HTS)

Territory of a party – as defined in Chapter 1, Section C: Country-Specific Definitions of the USMCA:

(a). for Canada,

i. the land territory, air space, internal waters, and territorial sea of Canada,
ii. the exclusive economic zone of Canada, and
iii. the continental shelf of Canada, as determined by its domestic law and consistent with international law,

(b). for Mexico,

i. the land territory, including the states of the Federation and Mexico City,
ii. the air space, and
iii. the internal waters, territorial sea, and any areas beyond the territorial seas of Mexico within which Mexico may exercise sovereign rights and jurisdiction, as determined by its domestic law, consistent with the *United Nations Convention on the Law of the Sea*, done at Montego Bay on December 10, 1982; and

(c). for the United States,

i. the customs territory of the United States, which includes the 50 states, the District of Columbia, and Puerto Rico,
ii. the foreign trade zones located in the United States and Puerto Rico, and
iii. the territorial sea and air space of the United States and any area beyond the territorial sea within which, in accordance with the customary international law as reflected in the *United Nations Convention on the Law of the Sea*, the United States may exercise sovereign rights or jurisdiction.

Transmission – a gear box. Components include transmission cases, torque converters, torque converter housings, gears and gear blanks, clutches, and valve body assemblies, according to the USMCA, Appendix to Annex 4-B, Parts and Components for Determining the Origin of Passenger Vehicles and Light Trucks Under Article 3 of This Appendix, table A.2.

USMCA – the United States-Mexico-Canada Agreement.

Variable cost of production – a cost that changes based on the number of vehicles produced.

SECTION 1. Firm Information

Enter the 10-digit questionnaire token that was in the notification letter we sent to your firm. This will allow the project team to track your response. If you do not know this token, contact the project team at USMCAAutoROO@usitc.gov.

Questionnaire token: _____

1.1 Enter your firm's U.S. headquarters' address and the name of a person that we may contact if we have any questions regarding your response.

Business name			
Address			
City	State	Zip code	Website address
Contact person's name			Contact person's job title
Contact person's telephone number			Contact person's email

1.2 List your firm's full-time equivalent (FTE) employment, including non-production workers and contractors, in the United States for 2018 through 2023.

	2018	2019	2020	2021	2022	2023
FTE employment						

1.3

a. Does your firm produce motor vehicles in North America?
   - ○ Yes
   - ○ No

b. [If yes to 1.3a] In which countries does your firm produce motor vehicles (select all that apply)?
   - □ Canada
   - □ Mexico
   - □ United States

1.4

a. [If yes to 1.3a] Please provide the list of subsidiaries that will be included in your firm's responses.

Subsidiary Name	Country

1.5

a. [If 'yes' to 1.3a] Has your firm produced motor vehicles in North America that qualified for duty-free treatment under the USMCA between July 1, 2020 and July 1, 2024?
   - Yes
   - No

b. [If no to 1.5a] If no, please explain: _____

1.6

a. Are there any motor vehicles your firm plans to produce in North America (but does not yet) that would qualify for duty-free treatment under the USMCA?
   - Yes
   - No

b. Please explain: _____

1.7

a. [If no to 1.5a and 1.6a] Since January 1, 2018, the beginning of the year in which the USMCA draft text was released, did your firm make any changes to its North American supply chain in an attempt to qualify for duty-free treatment under the USMCA.
   - Yes
   - No

b. Please explain: _____

[If 'no' to 1.3a or 'no' to 1.5a, 1.6a, and 1.7a, skip to Section 5]

SECTION 2. Sourcing Changes

This section asks about changes made to motor vehicle parts sourcing and motor vehicle assembly since January 1, 2018, and the extent the USMCA automotive ROOs led to the change.[5] To the extent possible, please include all sourcing changes made within North America (Canada, Mexico, and the United States). For each question below, to the extent possible, please describe the impact of changes on each model line of motor vehicle.

2.1 ROOs effects on existing supply chains and production

2.1.1

a. Were there any assembly relocation decisions in which the USMCA automotive ROOs led your firm to continue assembly in North America instead of considering assembly relocation outside of North America?

- Yes
- No

b. [If 'yes' to 2.1.1a] Please provide the assembly relocation decisions, a brief explanation of the decisions, and the impacted model line of motor vehicle.

Please describe the assembly decision (e.g. firm would have shifted assembly location from United States to South Korea)	Please provide a brief explanation for the assembly decision	Model line of motor vehicle impacted

2.1.2

a. Were there any sourcing decisions in which the USMCA automotive ROOs contributed to your firm deciding to continue sourcing motor vehicle core parts or materials from a North American supplier instead of switching to a non-North American supplier?

- Yes
- No

b. [If 'yes' to 2.1.2a] Please provide the sourcing decisions, a brief explanation of the decisions, the impacted core part, the impacted model line of motor vehicle, and level of attribution to the USMCA automotive ROOs.

Please describe the sourcing decision (e.g. firm would have shifted sourcing of aluminum from	Please provide a brief explanation for the sourcing decision	Core part or material impacted [dropdown: engine, transmission, body and chassis, axle, suspension	Model line of motor vehicle impacted	Attribution to USMCA automotive ROOs (dropdown: partial, full)

[5] The questions in section 2.1 are broken up into nine subsections which ask about the seven core parts under the USMCA, as well as steel and aluminum purchases. For more information on any of the core parts, see USMCA, Appendix to Annex 4-B, Core Parts for Passenger Vehicles and Light Trucks, table A.1.

United States to South Korea)		system, steering system, advanced battery, steel, aluminum]		

2.1.3

a. Since January 1, 2018, has your firm **relocated assembly** of a model line of motor vehicle to North America (either from outside North America or between North American countries)? An assembly relocation may be a relocation of an entire factory, or a partial shift in output from one factory to another.
   - Yes
   - No

b. [If yes to 2.1.3a] For each assembly relocation, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the assembly relocation (e.g. from city, state to city, state)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the assembly relocation can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change
Change #1				

c. [If yes to 2.1.3a] Please list the change in assembly location attributed to the USMCA ROOs by model line of motor vehicle in the table below.

Please describe the assembly relocation (e.g. from city, state to city, state)	Model line of motor vehicle impacted	Please provide a brief explanation for the assembly relocation	Month and year of the assembly relocation	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' in column 3 in 2.1.3b}	{carried forward from above if 'partial' or 'full' in column 3 in 2.1.3b}				

d. [If yes to 2.1.3a] For each assembly relocation attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to assembly relocation?

Short description of the assembly relocation	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of assembly (in dollars)	Change in per-motor vehicle labor costs (in dollars)	Onetime overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' in column 3 in 2.1.3b}	{carried forward from above if 'partial' or 'full' in column 3 in 2.1.3b}				

2.2 ROOs effects on new production

2.2.1

a. Since the USMCA entered into force, did you add any **new model lines of motor vehicles**?
   - Yes
   - No

b. [If 'yes' to 2.2.1a] Did the USMCA automotive ROOs affect decisions about the sourcing of parts and materials when the new model line of motor vehicle was brought into production?
   - Yes
   - No

c. [If yes to 2.2.1b] Please list the new model lines of motor vehicles that were added since January 1, 2018.

Model line of motor vehicle added	Month and year of addition	Country of vehicle assembly	Please describe the sourcing decision impacted by the USMCA automotive ROOs

2.2.2

a. [If 'yes' to 2.2.1a] Did the USMCA automotive ROOs affect decisions about the location of assembly for new model lines of motor vehicles?
   - Yes
   - No

b. [If 'yes' to 2.2.2a] Please list the model line(s) of motor vehicles whose assembly location decision was affected by the USMCA automotive ROOs and the level of attribution to the USMCA automotive ROOs.

Model line of motor vehicle impacted	Assembly location decision ([dropdown: Assemble within North America, Assemble outside North America)	Attribution to the USMCA automotive ROOs [dropdown: partial, full]	Please indicate if assembly location decision is attributable to RVC, LVC, or both [dropdown: RVC, LVC, both]	Please list any non-USMCA factors contributing to the sourcing change

2.3 Sourcing changes of motor vehicle parts and materials

2.3.1 Please select the following motor vehicle parts and materials for which your firm has made sourcing changes since January 1, 2018, for its North American production (select all that apply).

- □ Engines
- □ Transmissions
- □ Bodies and chassis
- □ Axles
- □ Suspension systems
- □ Steering systems
- □ Advanced batteries
- □ Steel
- □ Aluminum

[If 'engines' is selected in 2.3.1] 2.3.2

a. For each sourcing change of **engines**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of engines from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **engine** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.2a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.2a}				

c. For each **<u>engine</u>** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the onetime overhead costs, and the change in employment?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	Onetime overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.2a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.2a}				

[If 'transmissions' is selected in 2.3.1] 2.3.3

a. For each sourcing change of **<u>transmissions</u>**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs	[If 'partial' or 'full' from column 3] Please indicate if the sourcing	[If 'none' or 'partial' from column 3] Please list any non-

of engines from South Korea to United States)		([dropdown: none, partial, full])	change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	USMCA factors contributing to the sourcing change

b. Please list the **transmissions** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.3a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.3a}				

c. For each **transmission** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.3a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.3a}				

[If 'bodies and chassis' is selected in 2.3.1] 2.3.4

a. For each sourcing change of **bodies and chassis**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of engines from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **bodies and chassis** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.4a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.4a}				

c. For each **body and chassis** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the onetime overhead costs, and the change in employment?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.4a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.4a}				

[If 'axles' is selected in 2.3.1] 2.3.5

a. For each sourcing change of **axles**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of engines from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **axle** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted

{carried forward from above if 'partial' or 'full' from column 3 in 2.3.5a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.5a}				

c. For each **axle** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.5a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.5a}				

[If 'suspension systems' is selected in 2.3.1] 2.3.6

a. For each sourcing change of **suspension systems**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of engines from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **suspension system** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.6a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.6a}				

c. For each **<u>suspension system</u>** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to the sourcing change?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.6a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.6a}				

[If 'steering systems' is selected in 2.3.1] 2.3.7

a. For each sourcing change of **<u>steering systems</u>**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of steering systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **steering system** sourcing changes attributed to the USMCA ROOS by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.7a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.7a}				

c. For each **steering system** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to the sourcing change?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full'	{carried forward from above if 'partial' or 'full'				

from column 3 in 2.3.7a}	from column 3 in 2.3.7a}				

[If 'advanced batteries' is selected in 2.3.1] 2.3.8

a. For each sourcing change of **advanced batteries**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of steering systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **advanced batteries** sourcing changes attributed to the USMCA ROOS by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.8a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.8a}				

c. For each **advanced battery** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to the sourcing change?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.8a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.8a}				

[If 'steel' is selected in 2.3.1] 2.3.9

a. For each sourcing change of **steel**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of steel from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **steel** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted

{carried forward from above if 'partial' or 'full' from column 3 in 2.3.9a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.9a}				

c. For each **steel** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to the sourcing change?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.9a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.9a}				

[If 'aluminum' is selected in 2.3.1] 2.3.10

a. For each sourcing change of **aluminum**, does your firm attribute it to the USMCA automotive ROOs? Please indicate the level of attribution to the USMCA automotive ROOs and identify which ROO in the table below.

Please describe the sourcing change (e.g. shifted sourcing of steering systems from South Korea to United States)	Model line of motor vehicle impacted	Attribution to the USMCA automotive ROOs ([dropdown: none, partial, full])	[If 'partial' or 'full' from column 3] Please indicate if the sourcing change can be attributed to RVC, LVC, or both [dropdown: RVC, LVC, both]	[If 'none' or 'partial' from column 3] Please list any non-USMCA factors contributing to the sourcing change

b. Please list the **aluminum** sourcing changes attributed to the USMCA ROOs by model line of motor vehicle impacted in the table below.

Short description of the sourcing change	Model line of motor vehicle impacted	Please provide a brief explanation for the sourcing change	Month and year of the sourcing change	Percent of model line of motor vehicle impacted	[If <100 percent in column 5] Please provide a brief explanation if less than 100 percent of the model line of motor vehicle was impacted
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.10a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.10a}				

c. For each **aluminum** sourcing change attributed to the USMCA ROOs, what was the change in per-motor vehicle variable costs of production, change in per-vehicle labor costs, the one-time overhead costs, and the change in employment due to the sourcing change?

Short description of the sourcing change	Model line of motor vehicle impacted	Change in per-motor vehicle variable costs of production (in dollars)	Change in per-motor vehicle labor costs (in dollars)	One-time overhead costs (in dollars)	Change in employment (in FTE)
{carried forward from above if 'partial' or 'full' from column 3 in 2.3.10a}	{carried forward from above if 'partial' or 'full' from column 3 in 2.3.10a}				

SECTION 3. Effects of the USMCA Automotive ROOs

3.1 Please provide your firm-level, aggregated USMCA automotive RVC and LVC, in percent, for all models for which your firm calculated RVC and LVC pursuant to USMCA between 2020 and 2023. Please also provide your firm-level percent of steel and aluminum that was sourced from North America between 2020 and 2023.

	2020	2021	2022	2023
RVC				
LVC				
Steel				
Aluminum				

3.2

a. Has your firm increased wages at any of its North American parts or assembly plants so that they qualify for LVC certification?
   - Yes
   - No

b. [If 'yes' to 3.2a] Please explain: _____

3.3

a. Has your firm's use of automation changed to better meet the USMCA automotive ROOs?
   - Increased
   - No change
   - Decreased

b. [If 'increased' or 'decreased' to 3.3a] Please explain: _____

3.4

a. Have the USMCA automotive ROOs affected innovation at your firm (e.g., resulted in changes to R&D investment, increased or decreased ability to bring new products to market, changes in design or production processes, increased or decreased patents, etc.)?
   - Increased innovation.
   - Decreased innovation.
   - No change.

b. [If 'increased' or 'decreased' to 3.4a] Please explain: _____

3.5 Resilience

3.5.1

a. Have the USMCA automotive ROOs affected your firm's ability to maintain motor vehicle production operations when facing **non-North American** shocks (for example, if a non-North American supplier is temporarily unable to supply at the expected level)?

- Our firm is **better able** to maintain motor vehicle production because of the USMCA automotive ROOs.
- Our firm is **less able** to maintain motor vehicle production because of the USMCA automotive ROOs.
- No change in ability to maintain motor vehicle production operations.

b. [If 'better able' or 'less able' to 3.5.1a] Please explain: _____

3.5.2

a. Have the USMCA automotive ROOs affected your firm's ability to maintain motor vehicle production operations when facing **North American** shocks (for example, if a North American supplier is temporarily unable to supply at the expected level)?
   - Our firm is **better able** to maintain motor vehicle production because of the USMCA automotive ROOs.
   - Our firm is **less able** to maintain motor vehicle production because of the USMCA automotive ROOs.
   - No change in ability to maintain motor vehicle production operations.

b. [If 'better able' or 'less able' to 3.5.2a] If yes, please explain: _____

3.6 Trade

3.6.1

a. Have the USMCA automotive ROOs affected your firms exports since entry into force of the USMCA?
   - Yes
   - No

b. [If 'yes' to 3.6.1a] Please select how the USMCA automotive ROOs have affected your firm's exports since entry into force of the USMCA?

	Effect of the USMCA automotive ROOs on exports [dropdown: decrease of greater than five percent, decrease of zero to five percent, no effect, increase of zero to five percent, increase of greater than five percent]
Exports to Canada and Mexico	
Exports to other countries	

3.6.2

a. Since the USMCA entered into force, did your firm pay the most-favored nation rate of duty for **passenger vehicles**, **light trucks**, or **heavy trucks** when importing motor vehicles into Canada, Mexico, or the United States rather than meet the USMCA automotive ROOs?
   - Yes
   - No

b. [If yes to 3.6.2a] Please respond by model line of motor vehicle:

Model line of motor vehicle for which duty was paid	Importing country [dropdown: Canada, Mexico, United States]	Year(s) additional duty paid	Number of vehicles

3.6.3

a. Since the USMCA entered into force, did your firm pay the most-favored nation rate of duty for **core parts** when importing those core parts into Canada, Mexico, or the United States rather than meet the USMCA automotive ROOs?
   - Yes
   - No

b. [If yes to 3.6.3a] Please respond by core part and model line of motor vehicle:

Core part for which duty was paid [dropdown: engine, transmission, body and chassis, axle, suspension system, steering system, advanced battery]	Model line of motor vehicle impacted	Importing country [dropdown: Canada, Mexico, United States]	Year(s) additional duty paid	Number of core parts

SECTION 4. Technological Changes

This section asks about the extent to which the USMCA Automotive ROOs remain relevant in light of technological changes occurring in the automotive industry. Section 4 is broken up into two subsections; the first asks about the five technological changes that the Commission examined in our 2023 report, while the second asks for information related to any additional technological changes that may impact the continued relevancy of the USMCA Automotive ROOs.

4.1 Impact on the overall continued relevancy of the USMCA automotive ROOs

In its first report, the Commission identified technological changes in the U.S. automotive industry that have occurred since the negotiation of the USMCA, or are in the process of occurring, and evaluated the extent to which these technological changes affect the application of the USMCA automotive ROOs in the U.S. automotive industry.[6] For each of these five topics below, please indicate the extent to which the specified technological change has any impact on the overall continued relevancy of the USMCA automotive ROOs, as those changes pertain to your firm.[7]

The tariff classification of electric vehicles (EV) and hybrid light trucks:

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: The production of EV and hybrid pickup trucks and work vans has increased significantly since the negotiation of the USMCA. However, there is a divergence in the tariff classification of these vehicles compared to internal combustion engine counterparts. The USMCA was written in HS 2012 nomenclature, and HS subheading 8704.90 was classified as a heavy truck under the USMCA. HS subheading 8704.90, in HS 2012 nomenclature, is where all EV and hybrid trucks are classified, regardless of their size. This means that EV and hybrid trucks that would otherwise be thought of as light trucks are classified as heavy trucks under the USMCA, resulting in a different set of ROOs for these motor vehicles compared to similar motor vehicles with internal combustion engines. As the volume of EV and hybrid pickup trucks and work vans continues to increase, this means that the share of light vehicles subject to a different set of ROOs will continue to increase in future years.

4.1.1

a. Does your firm currently produce any EV or hybrid light trucks (e.g., a hybrid or electric pickup truck or work van) in North America that are classified as a heavy truck under the USMCA?
   - Yes
   - No

b. Has your firm publicly announced future plans to produce any EV or hybrid light trucks in North America that will be classified as a heavy truck under the USMCA?
   - Yes

[6] Section 202A(g)(2)(C) of the Act (19 U.S.C. § 4532(g)(2)(C)) directs the Commission in its report to examine "whether the automotive rules of origin are relevant in light of technological changes in the United States." However, the Act does not define "relevant."

[7] Each of these topics was discussed in more detail in chapter 4 of the Commission's *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2023 Report*, which can be found here.

- No

c. [If 'yes' to 4.1.1a or 4.1.1b] Please list those model line(s) of motor vehicle:

_____

d. [If 'yes' to 4.1.1a or 4.1.1b] How impactful is the increase in production of EV and hybrid pickup trucks and work vans and their classification as heavy trucks on the continued relevancy of the USMCA automotive ROOs related to these goods?

Factor	**No impact**	**Minimal impact**	**Some impact**	**Large impact**
Classification of EV and hybrid pickup trucks and work vans as a heavy truck				

e. [If 'yes' to 4.1.1a or 4.1.1.b] Please explain: _____

Differences between tariff-shift rules for stamped vs. cast aluminum motor vehicle body parts

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: Aluminum automotive bodies were traditionally made from stamped aluminum body parts, but aluminum casting is increasingly becoming an alternative method of production for automotive bodies, and offers certain advantages compared to stamping. The USMCA automotive ROOs for aluminum are such that stamped aluminum motor vehicle body parts can qualify as originating if certain intermediate production steps are performed within the USMCA region, even if the process uses non-originating aluminum ingots. However, since the casting production process does not have an equivalent intermediate production step, producers cannot qualify comparable cast body parts as originating, unless the ingot itself was originating.

4.1.2

a. Does your firm cast aluminum body parts for production of motor vehicles in North America?
   - Yes
   - No

b. [If 'no' to 4.1.2a] Does your firm currently have plans to cast aluminum body parts for the production of motor vehicles in North American by December 31, 2025?
   - Yes
   - No

c. [If 'yes' to 4.1.2a or 4.1.2b] Please explain the extent to which your firm casts aluminum body parts or plans to do so in the future: _____

d. [If 'yes' to 4.1.2a or 4.1.2b] How impactful is the use of cast versus stamped aluminum body parts on the continued relevancy of the USMCA automotive ROOs related to these goods?

Factor	No impact	Minimal impact	Some impact	Large impact
Differences between tariff-shift rules for stamped vs. cast aluminum body parts				

e. [If 'yes' to 4.1.2a or 4.1.2b] Please explain: _____

The increasing importance of nontraditional motor vehicle inputs

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: The value of nontraditional motor vehicle inputs in the motor vehicle supply chain continues to rise, as does the share of the final motor vehicle cost encompassed by these inputs. However, these inputs are typically not classified as motor vehicle parts in the Harmonized System and are typically not subject to any product-specific automotive rules of origin under the USMCA. Examples of these inputs include semiconductors, sensors, cameras, and touch screens.

4.1.3

a. How impactful is the increasing importance of nontraditional motor vehicle inputs (and the lack of USMCA automotive ROOs for these goods) on the continued relevancy of the USMCA automotive ROOs?

Factor	No impact	Minimal impact	Some impact	Large impact
Increased importance of nontraditional motor vehicle inputs				

b. Please explain: _____

The lack of recycling specific provisions for advanced batteries in the USMCA Automotive ROOs

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: As the first generation of EV and hybrid vehicles reach their end-of-life cycle for the batteries powering those vehicles, battery recycling will be an increasingly important part of the automotive supply chain. However, the USMCA does not provide recycling-specific provisions for advanced batteries in the USMCA automotive ROOs. For example, advanced battery components partially (or fully) composed of metals recovered from recycled materials do not qualify as originating for the purpose of calculating origination requirements. This means that the determination of whether the advanced battery made using recycled materials qualifies as originating under the USMCA is made on the basis of the same ROOs for the original battery, whether or not the recycled cells were created within the USMCA region. This lack of recycling-specific provisions will continue to increase in importance as more first generation EV batteries reach their end-of-life cycle.

4.1.4

a. Does your firm currently use advanced batteries with recycled components in its North American supply chain (e.g., recycled cathode active material)?
   - Yes
   - No

b. [If 'no' to 4.1.4a] Does your firm plan to use advanced batteries with recycled components in its North American supply chain by December 31, 2025?
   - Yes
   - No

c. [If 'yes' to 4.1.4a or 4.1.4b] Where does (or will) this recycling occur (city, state/province/territory, country)? _____

d. [If 'yes' to 4.1.4a or 4.1.4b] How impactful is the lack of recycling specific provisions for advanced batteries in the USMCA on the relevancy of the USMCA automotive ROOs related to these goods?

Factor	**No impact**	**Minimal impact**	**Some impact**	**Large impact**
Lack of recycling specific provisions for advanced batteries				

e. [If 'yes' to 4.1.4a or 4.1.4b] Please explain: _____

The continued relevancy of the various USMCA motor vehicle parts lists

Brief description of the technological change and the potential impact on the relevancy of the USMCA automotive ROOs: There are many differences in the composition of an EV or hybrid vehicle compared to traditional vehicles powered by internal composition engines, and these differences are becoming increasingly important as a larger and larger share of vehicles in North America are increasingly EVs or hybrid vehicles. During the course of conducting the Commission's 2023 investigation, which produced *USMCA Automotive Rules of Origin: Economic Impact and Operation, 2023 Report*, stakeholders disagreed about the extent to which the core, principal, and complementary parts lists in the USMCA remain relevant in light of the shift to electric vehicles, as well as the need for continued monitoring and potential updating of the USMCA's various motor vehicle parts lists.

4.1.5

a. Does your firm view the USMCA motor vehicle parts lists (core, principal, and complementary) as still maintaining relevancy in light of the shift to EVs and hybrid vehicles and any other industry shifts since entry into force of the USMCA?
   - Yes
   - Maybe
   - No

b. Please explain: _____

c. How impactful is the continued shift to EVs and hybrid vehicles on the continued relevancy of the USMCA automotive ROOs related to these vehicles?

Factor	No impact on relevancy	Minimal impact on relevancy	Some impact on relevancy	Large impact on relevancy
Continued shift to EVs and hybrid vehicles				

d. Please explain: _____

e. How impactful would the continued monitoring of the USMCA parts lists, and potential updates to those lists, be on your firm's ability comply with the USMCA automotive ROOs?

Factor	No impact on compliance	Minimal impact on compliance	Some impact on compliance	Large impact on compliance
Continued monitoring of, and potential updates to, the USMCA parts lists				

f. Please explain: _____

4.2 Impact on the future relevancy of the USMCA automotive ROOs

In addition to the five topics covered in the first report, the Commission is tasked with continuing to monitor and analyze technological changes that may impact the future relevancy of the USMCA automotive ROOs.

4.2.1 Please describe any other technological changes that have occurred since January 1, 2018, in the North American automotive industry that may have impacted the relevancy of the USMCA automotive ROOs. This includes changes in the composition of motor vehicles, changes to key parts of motor vehicles, changes in production processes, etc. _____

4.2.2 Please describe any other technological changes you expect to occur in the North American automotive industry between now and the end of 2025 that may impact the relevancy of the USMCA automotive ROOs. This includes changes in the composition of motor vehicles, changes to key parts of motor vehicles, changes in production processes, etc. _____

SECTION 5. Other Information [NARRATIVE RESPONSE PROMPT]

5.1 If your firm would like to further explain any of the responses in this questionnaire or provide additional information about impacts of the USMCA automotive ROOs to your firm, use the space below. As with all answers to this questionnaire, your response will be confidential and will only be referenced if we can ensure anonymity.

SECTION 6. Certification

The undersigned certifies that the information supplied herein in response to this questionnaire is complete and accurate to the best of their knowledge and belief. Section 332(g) of the Tariff Act of 1930 (19 U.S.C. § 1332(g)) provides that the Commission may not release information which it considers to be confidential business information unless the party submitting such information had notice, at the time of submission, that such information would be released by the Commission, or such party subsequently consents to the release of the information.

The undersigned acknowledges that all information, including confidential business information, submitted in this questionnaire response and throughout this investigation may be disclosed to and used by:

(i) the Commission, its employees and Offices, and contract personnel
  (a) for developing or maintaining the records of this or a related proceeding, or
  (b) in internal investigations, audits, reviews, and evaluations relating to the programs, personnel, and operations of the Commission including under 5 U.S.C. Appendix 3; or

(ii) U.S. government employees and contract personnel
  (a) for cybersecurity purposes or
  (b) in monitoring user activity on U.S. government classified networks.

The undersigned understands that all contract personnel will sign appropriate nondisclosure agreements. The Commission will not disclose any confidential business information, unless such information is otherwise available to the public. The United States Trade Representative has asked that the Commission not include any confidential business information in the report it transmits to them. Information received in response to this questionnaire will be aggregated with information from other questionnaire responses. The information will not be published in a manner that would identify your firm or reveal the operations of your business.

Certifier's name and title	Date of certification

Check the box below in place of a written signature to indicate that the authorized official listed above has certified the information provided.

☐ Certified

Before submitting your firm's completed questionnaire, report the actual number of hours required and the cost to your business of completing this questionnaire, including all preparatory activities.

Number of hours: _____
Cost ($): ____