

September 13, 2024

The Honorable Amy A. Karpel
Chair
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable Rhonda K. Schmidlein
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable Jason E. Kearns
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

The Honorable David S. Johanson
Commissioner
U.S. International Trade Commission
500 E Street S.W.
Washington D.C. 20436

Re: Duties on Aluminum Lithographic Printing Plates Will Increase Costs for Businesses and Consumers, And Threaten Jobs

Dear Chair Karpel and Commissioners Schmidlein, Kearns, and Johanson:

We are writing on behalf of a cross-industry coalition of stakeholders in the U.S. newspaper, printing, publishing, packaging, mailing, and related industries to oppose antidumping (AD) and countervailing duties (CVD) on imports of aluminum lithographic printing plates from Japan and China. The new proposed duties on aluminum printing plates have the potential to devastate entire industry segments, increase costs for businesses and their customers, jeopardize jobs, limit supply, and threaten the viability of many American small businesses.

The printing, publishing, paper-producing, and mailing industries employ account for approximately 8.5 million jobs in the United States and represent five percent of the nation's total civilian labor force. Our industries are already trying to navigate significant financial challenges, and the preliminary duties on aluminum printing plates that are currently in place are making matters worse. A large and diverse segment of American businesses rely on quality, affordable aluminum lithographic printing plates to provide essential products and services to their customers. These plates are used to print newspapers, books, labels, signs, marketing and educational materials, textbooks, catalogs, mailings, restaurant menus, informational inserts in prescriptions, product instruction manuals, packaging for consumer-packaged goods, and other materials that are critical to a broad cross-section of industries.

Currently, there is no U.S. supplier of the aluminum sheet that is necessary to make aluminum printing plates, so the aluminum must be imported. In addition, many companies rely on printing technology that requires violet laser imaged plates, which are also not produced in the U.S. Other companies rely on thermal imaged plates that are produced in the U.S., Europe, Japan, and China. Excessive duties on plate imports will increase costs on printers, publishers, and other customers of printed product, who, in turn, will be forced to pass those costs on to their customers. It will also limit access to parts and maintenance and decrease the healthy competition among printing plate manufacturers that ultimately benefits our industries.

Small businesses, many of whom are already struggling to make ends meet in the face of declining demand and other market trends, will disproportionately shoulder the burden of these duties. First, the duties will directly impact the bottom lines of many small businesses that rely on aluminum printing plates, including

independent and family-owned printing companies and local and community newspapers that are often staffed by just one or two employees. In turn, costs will go up for their customers, including small businesses that advertise in newspapers, family-owned restaurants, small packaging or shipping companies, small and independent book publishers, retailers, marketing firms, and many others.

Import duties on aluminum printing plates will hurt, not help, the domestic news, printing, publishing, and related industries, as well as the American businesses that rely on those industries. We urge the ITC to reject antidumping and countervailing duties on aluminum printing plates.

Sincerely,

AAN Publishers
American Commerce Marketing Association
America's Newspapers
Association for Postal Commerce (PostCom)
Association of American Publishers
Book Manufacturers' Institute
International Sign Association
National Small Business Association
News/Media Alliance
PRINTING United Alliance
1Vision