



Ambassador Robert E. Lighthizer  
United States Trade Representative  
600 17th St, NW  
Washington, DC 20006

January 10, 2018

Dear Ambassador Lighthizer:

We collectively are twenty-seven metal structure manufacturers that are part of the CSPV solar value chain. We strongly oppose the use of tariffs on solar modules in the current 201 case.

Our companies and our domestic suppliers support more than 5,700 manufacturing jobs across America. The metal structures we produce literally hold solar energy systems together and are one of the three major manufactured products in a solar system:

- *Modules* (convert light to electricity)
- *Advanced electronics* (convert direct current (DC) to alternating current (AC) electricity; increase the power production from modules; provide measurements and controls)
- *Mounting structures* (typically metal and physically support the solar power plant on the ground or a roof)

Much of the coverage of this case has focused on module manufacturing and retaining some of its presence in the U.S. We write to emphasize that we are manufacturing today one of the three pillars of manufactured products for the solar industry and we are doing so in America. As the industry grows, we intend to continue to hire thousands of U.S. workers.

Such growth is gravely threatened by high levels of tariffs in this trade case. We collectively ask that you consider the impact of demand destruction from high tariffs on our manufacturing business. We want to continue to manufacture competitive, high-quality products in the U.S. for U.S. customers, rather than cutting operations or laying off workers. On behalf of our 5,700 workers and the many more we plan to hire in the coming years, make the right choice in avoiding tariffs on solar modules and allowing us and the solar sector to continue to thrive.

Sincerely,



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