

## **Alert** | International Trade



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### **Miscellaneous Tariff Bill (MTB) Petition Process**

The Miscellaneous Tariff Bill (MTB) affords importers an opportunity to apply for a temporary reduction or suspension of duties paid on specific products imported into the United States. The products can be manufactured in any country. Petitions are submitted to the U. S. International Trade Commission (ITC), which then prepares a report to Congress with recommendations on which products should be included in an MTB. The deadline for submissions is Dec. 10, 2019, at 5:15 p.m. EST.

To be considered for inclusion in an MTB, the proposed duty suspension or reduction must be:

- Noncontroversial;
- Revenue-neutral (foregone tariff revenues of no more than \$500,00 per product); and
- Administrable by U.S. Customs and Border Protection (CBP).

The ITC compiles the petitions and posts them on the Miscellaneous Tariff Bill Petition System (MTBPS). ITC then evaluates any public comments received on these petitions to determine whether the request for duty suspension or reduction is “noncontroversial.”

The MTB timeline is as follows:

- Oct. 11, 2019 – Dec. 10, 2019: MTBPS open for petition submission.
- Dec. 10, 2019 – Jan. 11, 2020: ITC compiles petitions.

- No later than Jan. 11, 2020 – Mid-April 2020: ITC solicits public comments on petitions, conducts a review, and submits a preliminary report to Congress.
- By August 2020: ITC submits a final report to Congress, considering information submitted from the Department of Commerce as well as comments from congressional committees.

The petition process is open to all products, including those that were not granted a tariff reduction or suspension during the last MTB cycle. Interested parties should note that there is an option to petition for renewal of a tariff suspension or reduction granted in the previous MTB. Importers of such products need not have submitted the previous petition to submit the petition for renewal. In fact, it is in an importer's interest to submit a renewal petition because the previous petitioner may no longer have an interest in renewal, or may simply forget to submit a renewal.

Importers and other interested parties are encouraged to submit petitions early in the process. Though not required, the ITC may review petitions before the submission due date and inform petitioners if a problem exists with the submission. This allows petitioners to withdraw their submission and resubmit an error-free petition before the due date.

Greenberg Traurig's **International Trade Practice** has broad experience advising clients on tariff reduction strategies, including the MTB.

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