



AMERICAN ASSOCIATION OF
ORTHOPAEDIC SURGEONS

May 18, 2018

The Honorable Robert E. Lighthizer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, DC 20508

RE: Docket Number USTR-2018-0005

Dear Ambassador Lighthizer,

On behalf of the 18,000 board-certified orthopaedic surgeons who comprise the membership of the American Association of Orthopaedic Surgeons (AAOS), we would like to express our concern about proposed Section 301 tariffs on products imported from China. AAOS strongly urges the United States Trade Representative (USTR) to remove medical technologies from the list of products being subjected to a 25 percent tariff. AAOS is concerned that implementing tariffs on medical devices could increase health care costs and limit patient and provider access to critical medical technology.

Our goal is to provide the best musculoskeletal quality patient care possible, and medical technology helps us achieve this goal. Many of the medical devices included in the USTR 301 list directly impact orthopaedics. Artificial joints, orthopaedic and fracture appliances, needles, sutures and surgical instruments used by our surgeons appear on the Section 301 list. (specific items listed below). Tariffs would also be imposed on radiation therapy, ultrasound, x-ray and other medical technologies that affect our orthopaedic patients.

Orthopaedic Devices: US imports from China (USTR list 2017)

9021.1	Orthopedic or Fracture Appliances, Parts & Accessories	\$295,686,284
9021.31	Artificial Joints and Parts and Accessories	\$75,213,963
9021.39	Artificial Joints & Parts & Accessories	\$2,222,735
9018.90.60	Electro-Surgical Instruments & Appliances & Parts	\$44,362,951
3006.10	Sterile Surgical Catgut, Similar Sterile Material	\$355,061
9018.32	Tubular Metal Needles & Needles for Sutures & Parts	\$14,308,994

Total \$432,149,988

Medical devices were not a target of the Section 301 investigation, however there are at least \$3 billion dollars of medical technology products included on the Section 301 list. Inclusion of these products on the Section 301 list is concerning and could increase cost and limit patient care. Numerous studies have shown that medical technology not only directly impacts the health, well-being and life of Americans, but also provides significant economic benefit.

AAOS appreciates the opportunity to comment on the proposed tariffs, and respectfully asks the Administration to remove the proposed tariffs on medical devices as part of the Section 301 list. If you should have any questions, please do not hesitate to contact William O. Shaffer, MD, AAOS Medical Director, at shaffer@aaos.org.



AMERICAN ASSOCIATION OF
ORTHOPAEDIC SURGEONS

Sincerely,

David Halsey MD

David A. Halsey, MD
President, American Association of Orthopaedic Surgeons

Cc: Thomas E. Arend, Jr., CAE, CEO, AAOS
William O. Shaffer, MD, Medical Director, AAOS