



2000 Market Street  
Philadelphia, PA 19103

November 19, 2009

The Honorable Max Baucus  
Chairman  
Committee on Finance  
United States Senate  
219 Dirksen Senate Office Building  
Washington, DC 20510

RE: Comments on S. 1876 (A bill to suspend temporarily the duty on 11-Aminoundecanoic acid)

Dear Chairman Baucus,

Pursuant to the Finance Committee's request for public comments on the miscellaneous tariff bills introduced in the Senate during the 111<sup>th</sup> Congress, we are submitting the following comments in support of the enactment of S. 1876, which provides for a temporary suspension of import duties on 11-Aminoundecanoic acid.

Arkema Inc. is a world-class producer of chemicals for the industrial market. We have facilities in 14 communities across the United States, with our headquarters in Philadelphia, Pennsylvania. The work by Arkema's nearly 2,000 employees in North America accounts for 25% of the company's world-wide \$7 billion in sales.

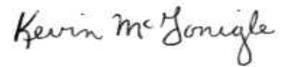
We are writing in support of S. 1876 on behalf of Arkema and our customers who rely on the enactment of duty suspension provisions that are vital to the United States economy. Without relief from tariffs on key specialized chemicals, Arkema and its United States-based customers will be disadvantaged in the global marketplace. At a time of economic turmoil, Arkema cannot afford higher costs resulting from imposition of tariffs. Therefore, it is essential that the Senate Finance Committee enact the tariff relief proposed in S. 1876.

Further, when considering ways to stimulate the U.S. economy, you should not forget the important role the MTB has played in supporting U.S. jobs. The MTB helps sustain production levels and jobs here in America, as the tariff savings from individual duty suspension provisions like S. 1876 will allow Arkema and its customers to maintain employment at U.S. manufacturing plants. The tariff reduction in S. 1876 represents a key bottom-line solution to help our company manage through tough economic times.

Finally, we strongly support S. 1876 as there is no U.S. production of 11-Aminoundecanoic acid. The duty suspension request process is highly transparent, with extensive reviews by the International Trade Commission, the Commerce Department, Customs and Border Protection and the relevant Congressional Committees to verify that there are no competing domestic interests and that revenue limits are kept. Arkema must import 11-Aminoundecanoic acid and doing so does not adversely affect any U.S. industry or the revenue of the United States.

Thank you for your support and, as always, we look forward to working with you to strengthen our domestic economy and enhance the competitiveness of U.S. manufacturing.

Sincerely,

A handwritten signature in black ink that reads "Kevin McGonigle". The signature is written in a cursive style with a large, stylized initial 'K'.

Kevin McGonigle  
Customs Compliance Manager  
Arkema Inc.  
Phone # 215-419-7055  
Email: [Kevin.McGonigle@Arkema.com](mailto:Kevin.McGonigle@Arkema.com)