



NATIONAL STONE, SAND
& GRAVEL ASSOCIATION

May 16, 2025

Mr. Eric Longnecker
Deputy Assistant Secretary for Technology Security
Bureau of Industry & Security
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Comments on Sec. 232 National Security Investigation of Imported Trucks (XRIN 0694- XC125)

Dear Mr. Longnecker:

On behalf of the over 500 members of the National Stone, Sand & Gravel Association (NSSGA), I write to submit comments related to the investigation to determine the effects on the national security of imports of medium-duty trucks, heavy duty trucks, and medium- and heavy-duty truck parts, and their derivative products, under section 232 of the Trade Expansion Act of 1962.

NSSGA members consist of stone, sand and gravel producers; industrial sand suppliers; and the equipment manufacturers and service providers who support them. With upwards of 9,000 locations, the aggregates industry produces 2.5 billion tons of materials used annually in the United States. Aggregates are the building blocks of our modern society and are needed to construct and maintain roads, railways, bridges, tunnels, water supply, sewers, electrical grids and telecommunications.

We have significant concerns regarding the inclusion of off-road equipment in the referenced investigation. The off-road sector is fundamentally distinct from the on-road industry. Our equipment, ranging from compact utility machines to heavy-duty machinery designed for aggregates production, construction, and mining, is built to endure demanding environments. The production process involves complex global supply chains, sourcing specialized components from suppliers worldwide. No national security risks are evident in this context.

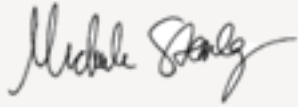
Including off-road equipment in the investigation would be overly broad, encompassing diverse economic sectors with unrelated functions. NSSGA strongly



requests that off-road equipment be excluded from the scope of this inquiry and that this exclusion be clearly stated in any final reports or subsequent actions.

Thank you for your consideration of our position on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Michele Stanley". The signature is fluid and cursive, with the first name "Michele" being more prominent than the last name "Stanley".

Michele Stanley
Interim CEO
National Stone, Sand & Gravel Association

