



November 3, 2025

The Honorable Jamieson Greer
United States Trade Representative
Office of the United States Trade Representative
600 17th Street NW
Washington, D.C. 20230

Re: AED's Response to Request for Public Comments Relating to the Operation of the Agreement Between the United States of America, the United Mexican States, and Canada (USTR-2025-0004)

Dear Ambassador Greer:

I write to submit comments on behalf of Associated Equipment Distributors (AED) related to the request for public comment relating to the operation of the Agreement Between the United States of America, the United Mexican States, and Canada (USMCA).

AED is the international trade association representing companies that sell, rent, and service equipment used in construction, agriculture, mining, forestry, industrial and municipal applications. Our nearly 500 U.S.-based dealer members operate over 7,700 locations across the United States, employing more than 145,000 workers and generating nearly \$110 billion in annual revenue. AED also has than 385 non-dealer members such as manufacturers and service providers.

As a U.S.-based organization with companies operating in the United States, Canada and Mexico, AED members are uniquely impacted by trade uncertainty in North America. USMCA modernized and strengthened the trade ties between the three countries, while boosting economic growth and job creation here in the United States. Equipment dealers, manufacturers, and our customers, including the nation's farmers, ranchers, and contractors, have all benefited immensely from USMCA.

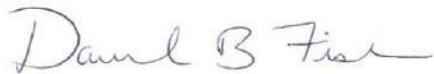
The case for maintaining USMCA is strong and AED advocates for continued promotion of North American integration. In addition to strongly supporting renewing USMCA for the full 16-year term to provide the U.S. equipment industry with long-term certainty, AED recommends the administration pursues the following goals and principles:

- Exempt USMCA-qualified goods from all Sec. 232 and International Emergency Economic Powers Act tariffs.
- Maintain chapters and language on digital trade and remanufactured goods.

- Broaden the availability of duty drawback and duty deferral programs under USMCA.

U.S. equipment dealers, manufacturers, and our customers rely on strong international agreements, such as USMCA. USMCA has strengthened the North American supply chain and facilitated significant investment in the United States while providing an essential framework for fair trade between two key allies and partners—Canada and Mexico.

Sincerely,

A handwritten signature in cursive script that reads "Daniel B. Fisher".

Daniel B. Fisher
Senior Vice President