



May 10, 2013

Via Electronic Submission to: <http://www.regulations.gov/>

Douglas Bell
Chair, Trade Policy Staff Committee
United States Trade Representative
1724 F Street, NW
Washington, D.C. 20508

Dear Chairman Bell:

I write on behalf of the 1.2 million active and retired members of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union (USW) in response to the request for comments concerning the proposed Transatlantic Trade and Investment Partnership Agreement published in the Federal Register April 1, 2013 (Docket No. USTR-2013-0019).

The USW is the largest industrial union in North America and represents workers producing a wide variety of goods, such as steel, chemicals, paper products, tires, glass and commercial uranium, as well as mining a number of metals. Over the years, our members have suffered greatly from unfairly traded imports and the offshoring of production and jobs, which have steadily risen as the United States has entered into more and more trade agreements. USW members do not want – and they do not deserve – more of the same but instead want the opportunity to have fair and balanced trade that creates good manufacturing jobs and production here in the U.S. It is long past time to stop the race to the bottom and the lower standard of living bad trade deals have wrought.

The Transatlantic Trade and Investment Agreement negotiations (TTIP) provide an opportunity to reshape trade so that it broadly benefits American workers and grows domestic manufacturing. The TTIP, if properly formulated should measure success by the results received by workers and should lead to an increase in the standard of living for workers and to broadly shared prosperity in the nation. It is imperative that negotiators work to understand the real world impacts of past trade agreements and not repeat them. Negotiations should remain focused on efforts to create and maintain good jobs here in the United States.

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union

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We also recognize that the European Union's overall standard of living and development level provides a real opportunity to forge a 21st century trade agreement that reflects the changing nature of global trade and the challenges it presents. The challenge of competing with state-owned or state-supported enterprises must be dealt with directly and must ensure that SOEs do not distort either market, but instead carry on business operations on a level playing field so that no private actor is left to compete against SOEs who are subsidized or provided other benefits from their home government not otherwise available in the marketplace. Likewise, rules of origin must be developed to maximize job creation among the TTIP countries and not create opportunities for non-TTIP countries to benefit from the agreement.

Additionally, TTIP negotiations must not undermine, in any, way U.S. laws on government procurement and must not bind sub-federal entities to any TTIP procurement provisions without the express and binding consent of sub-federal entities (as has always been law and practice), nor alter in any manner the exemptions or exceptions taken from the obligations undertaken by the United States in the WTO Government Procurement Agreement. Importantly, any agreement must ensure that U.S. trade laws remain robust and able to be vigorously enforced here at home when American workers and companies are harmed by unfairly traded imports.

These are but a few of the many and important issues (e.g., labor rights) a TTIP negotiation must achieve in order to craft an agreement designed to benefit working families and our nation. The USW aligns itself with the comments filed by the AFL-CIO.

Sincerely,



Holly R. Hart

Assistant to the International President
Legislative Director