

From: Catherine Robinson <crobinson@nam.org>
Sent: Fri May 14 09:21:41 2010
Subject: Conflict Minerals Amendment to the Financial Services Bill



May 14, 2010

The Honorable Chris Dodd
United States Senate
Washington, DC 20510

The Honorable Richard Shelby
United States Senate
Washington, DC 20510

To Chairman Dodd and Ranking Member Shelby:

On behalf of the Customs and Border Coalition (CBC), the undersigned associations write to express our support for the underlying goal of Amendment 3791 to the financial reform legislation, which strives to prevent the atrocities occurring in the Democratic Republic of Congo, *but also to raise concerns with the mechanisms in the bill to achieve the end goal.*

In particular, we are concerned that the disclosure requirements have not been properly vetted and attaching this amendment to the financial reform bill will prevent stakeholders from carefully reviewing the legislation to craft a solution that is implementable. We believe the amendment is a step in the right direction but would like the opportunity to work with the authors to improve upon it further.

As you may know, importers are concerned that they may not be able to obtain data that is reliable and valid to meet requirements proposed in the legislation, given the number of third parties and other intermediaries involved. For smelting and other processes, the minerals are combined into a large pot without segregation of the minerals from different locations before the importer has any control over them. The conflict minerals are not as easy to trace to their origin as diamonds or other items sold in their original form, given the processing required before the minerals are used in manufactured goods. Industry is ready to work with Congress to find a way forward but must be afforded such an opportunity which this amendment would prevent.

We respectfully request for all stakeholders to work together in an open and transparent manner to further modify the amendment to create a solution that is rational, implementable, and properly vetted. For more information, please have your staff contact Catherine Robinson, Secretariat for the CBC, at crobinson@nam.org or 202-637-3403.

Sincerely,

Aerospace Industries Association (AIA)
American Automotive Policy Council (AAPC)
Business Alliance for Customs Modernization (BACM)
Coalition of New England Companies for Trade (CONNECT)
Columbia River Customs Brokers and Forwarders Association
Custom Brokers & Forwarders Association of Northern California
Customs Brokers & Int'l Freight Forwarders Association of Washington State
IPC - Association Connecting Electronics Industries
Los Angeles Customs & Freight Brokers Association
National Association of Manufacturers (NAM)
National Electrical Manufacturers Association (NEMA)
National Foreign Trade Council (NFTC)
National Retail Federation (NRF)
Northern Border Customs Brokers Association
TechAmerica
Pacific Coast Council of Customs Brokers and Freight Forwarders, Inc.
San Diego District Customs Brokers Association
U.S. Chamber of Commerce
USA*Engage