ataACTION
Telehealth Policy to Transform Healthcare

October 17th, 2025

Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
U.S. Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

RE: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices

Dear Director Astle,

On behalf of ATA Action, we appreciate the opportunity to comment on Section 232 National Security Investigation of Imports of Medical Consumables and Medical Equipment, Including Devices.

The medtech industry is not only resilient but forward-looking. It has consistently responded to public health emergencies, strengthened domestic manufacturing capacity, and supported balanced global trade. During the COVID-19 pandemic, U.S. production of diagnostic tests and N95 masks expanded rapidly, allowing the nation to achieve a high degree of self-sufficiency.

The U.S. medical technology industry stands as a true American manufacturing success story. According to BMI (a Fitch Solutions company), domestically produced medical technologies make up roughly 70 percent of the U.S. market. Since 2017, manufacturing output in the medtech sector has shown steady and sustained growth, with employment expanding at three times the pace of the overall U.S. manufacturing industry. Thanks to this strong domestic foundation, the U.S. medtech sector is a global leader in exports, projected to reach approximately $80 billion in 2024.

However, given recent shortages brought about by pandemic-era supply chain disruptions and natural disasters, ATA Action understands the risks of depending on a limited number of manufacturers to supply the medical devices that support patient care and keep Americans healthy. In this context, ATA Action believes that greater competition in the medical device market promotes fairer pricing, innovation, and broader patient access. We also recognize the importance of maintaining the highest standards of quality and safety across all medical devices and their components.

With these priorities in mind, ATA Action supports administrative efforts to expand domestic manufacturing capacity and lessen reliance on imported medical devices. However, we are concerned about the potential effects that tariffs or other import restrictions could have on patient access and affordability. Therefore, ATA Action is urging the administration to maintain

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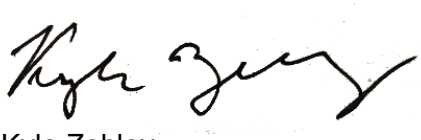
tariff exceptions and to not enact additional import restrictions on these critical products while simultaneously advancing policies that encourage U.S.-based production.

We thank the administration for its continued work to safeguard both the nation's health and its economy, and we appreciate the opportunity to provide feedback on this important issue. ATA Action welcomes continued dialogue on ensuring that all Americans have access to safe, high-quality, and affordable medical care.

Thank you for the opportunity to respond to this important topic. If you have any questions or would like to discuss further, please email me at kzebley@ataaction.org. We look forward to working with you to ensure all regulations and laws allow for continued innovation and do not impede access to care.

Kind regards,



Kyle Zebley
Executive Director
ATA Action