Commerce are working with the Committee, and that he hoped a suitable solution could be found so that more meaninful data can be provided for future use.

We have since been informed by Senator Morris Cotton of New Hampshire that on November 9, 1967 the Committee rejected the request, in the main, on the grounds that collection of detailed data would be difficult to administer and excessively burdensome to all parties concerned. The Senator's letter was prompted by complaints from the miniature precision bearings industry which alleged excessive imports of their products and requested, among other things, that the Committee's decision be reversed. More accurate import data, it is alleged, are necessary in order that the magnitude of the imports could be determined and the future impact of such imports on the industry more accurately evaluated.

It will be appreciated if you would take another look at the situation and advise as to what can be done in the matter of collecting more meaningful ball bearing import data. I understand that data on roller bearings, along the lines requested by the industry, will be collected.

I am sending a copy of this letter to Senator Cotton. You may, if you wish, communicate directly with the Senator or write to us.

Sincerely,

PRICE DANIEL, *Director.*

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THE SECRETARY OF COMMERCE,
*Washington, D.C., March 18, 1968.*

Hon. PRICE DANIEL,
*Director, Office of Emergency Planning,*
*Washington, D.C.*

DEAR GOVERNOR DANIEL: This is in response to your letter of February 14 to Secretary Trowbridge discussing the problem of the availability of statistical data on the importation of antifriction bearings. Members of this Department have had, and are continuing to have, discussions with the Chairman of the Committee for Statistical Annotation of Tariff Schedules in an attempt to resolve this problem. These discussions have stressed the importance of timely, accurate, and meaningful data which can be used to monitor the impact of imports and, we feel, the Committee stands ready to provide all reasonable assistance.

In order to obtain more meaningful data, the Bearing Industry applied to the Committee for Statistical Annotation of Tariff Schedules for nine breakouts of ball bearings and four breakouts for roller bearings. Roller bearing invoices traditionally carry descriptions similar to those requested by the industry and it was therefore possible for the Committee to provide for three breakouts in this area.

The request for ball bearings, however, was for breakouts by size and by degree and precision. In a letter to the Bearing Association's counsel denying this request, the Committee cited the Customs Bureau's concern that breakouts based on the dimensions of the outside diameter would be "Administratively burdensome to all parties concerned." The letter states further, "according to the Bureau, there are approximately 10,000 bearing numbers in existence and to require the importers and the staff of the Bureau of Customs to supply such statistical information would be a tedious undertaking." The letter states also that, "positive verification of a quality of bearing cannot be determined except by laboratory analysis. The Bureau cites the fact that more than 98% of ball and roller bearings are of ABEC 1 (Annular Bearing Engineering Committee Standard) quality or its equivalent. Since all roller and ball bearings have always been invoiced under the manufacturers' code numbers, an extensive educational campaign would be necessary to revise long-standing invoicing practices."

In spite of the difficulties that are involved, we believe that in the interest of national defense the required data on ball bearings imports as described below should be made available. Studies made by this Department of the imports of antifriction bearings have shown that no practical method is presently available by which the impact of imports in various segments of the industry can be monitored. It is possible that the increased imports of ball bearings are concentrated in critical sizes and types of bearings as has been alleged by the industry. This concentration could lead to a loss of markets which would cause production capacity to be reduced and create a gap in our ability to meet future defense needs.

*We understand that the Committee would consider a request for breakouts of sizes of ball bearnings if the degree of precision were not included. Accordingly,*