worthwhile, although he believed sophisticated importers do not normally have problems in this area. However, he indicated that our proposal would be of benefit to the smaller importer since the larger importers are already aware of whether a commodity is competitive or non-competitive.

Messrs. Marra and Coleman rejected our 4th suggestion that the Bureau of Customs refer samples to independent laboratories when their own facilities are overtaxed. They stated that if Customs laboratories could not process import samples within a reasonable time, the solution was to add staff or equipment to such laboratory. In addition, they stated that they had not heard of any delays in such laboratories. Mr. Marra indicated he would look into this problem.

One problem which requires further consideration is how the Bureau of Customs would keep track of prices submitted by domestic manufacturers in order to comply with the six month filing requirement with respect to competitive status. Messrs. Marra and Coleman are both concerned that Customs will be flooded with quotations from manufacturers they have never heard of or chemicals that may never be imported. Publishing a notice in the Federal Register warning manufacturers that products will be non-competitive unless price information is submitted, they argued, is an open invitation to an extraordinary amount of unnecessary paper work. They noted that, at present, Customs only obtains price quotations for benzenoids which are actually imported, and that the time of importation for those particular products. Mr. Marra requested that we should consider further and discuss with them the number of products for which price data might be submitted by the domestic industry in response to the six month notice requirement.

Mr. Burt indicated that since the Bureau of Customs felt that some of our suggestions would be useful to them, and since they deal with some of the principal complaints of importers, we should propose them in writing to the Herter Office.

ROBERT C. ZIMMER.

SYNTHETIC ORGANIC CHEMICAL MANUFACTURERS ASSOCIATION,
New York, N.Y., September 29, 1966.

Hon. WILLIAM M. ROTH,
Deputy Special Representative for Trade Negotiations,
Washington, D.C.

SOCMA TARIFF PROPOSAL

DEAR AMBASSADOR ROTH: The domestic benzenoid chemical industry expects to face fair competition but cannot survive against foreign competitors without tariffs to equalize the basic cost advantage which foreign producers enjoy today. Furthermore, no alternative has been found which could be substituted for ASP without incurring major dislocation in the benzenoid industry. Therefore, SOCMA proposes the following program which has the objective of eliminating any alleged inequities which may exist under today's administration of ASP, and of providing for the orderly reduction of tariffs while maintaining fair competitive conditions:

1. Retain the American Selling Price basis for tariff evaluation of benzenoid products.
2. Change the administrative procedures applicable to the American Selling Price method, including legislative changes necessary, so as to remove any procedural impediments to import competition.
3. Reduce existing tariffs at a rate proportional to the rate of reduction of the differential in cost of producing benzenoid products in the United States and foreign countries.

While there may be practical problems in implementing the above proposed changes, we are certain that such problems can be solved through the cooperation of interested parties. SOCMA pledges to cooperate in order that these changes may be implemented.

Sincerely yours,

C. S. OLDACH, *President.*