Proposed Implementation of Duties on Additional Aluminum, Steel, and Copper Derivative Articles Under Section 232 —
Brass-Wind Musical Instruments and Parts and Accessories
Docket No. BIS-2026-0331 | XRIN 0694-XC166

Dear Bureau of Industry and Security, U.S. Department of Commerce:

The National Association of Music Merchants (NAMM) submits this comment on BIS's notice proposing to add brass-wind musical instruments and their parts and accessories to the list of steel, aluminum, and copper derivative articles subject to Section 232 duties. NAMM is the trade association for the music products industry, an $18.1 billion global industry with more than 9,000 member companies and individual professionals, supporting an industry that employs more than 400,000 people worldwide. This comment addresses the proposed inclusion of brass-wind instruments and their components and accessories in aluminum, steel, and copper derivative articles under Section 232.

NAMM respectfully requests that imports under HTS 9205.10.0040 (brass-wind instruments, if valued under $10) and HTS 9205.10.0080 (brass-wind instruments if valued over $10) **not be included** in these Section 232 remedies and/or any other actions that would increase tariffs above the most-favored nation rate.

A. Metal Content of the Products

NAMM does not dispute that brass-wind instruments contain copper. Brass, the standard material for these instruments, is a copper-zinc alloy — most commonly "yellow brass" (roughly 70% copper, 30% zinc) or "gold brass" (roughly 85% copper, 15% zinc); some instruments also use nickel silver, a copper-zinc-nickel alloy[i]. **But metal content is only one of the five factors in the notice**, and NAMM asks BIS to weigh it against the points below: there is no national security rationale for including these products, domestic production cannot fully supply the student and school market, and the economic burden of a duty would fall hardest on school music programs.

B. National Security

NAMM is not aware of any defense, dual-use, or strategic-stockpile use for brass-wind instruments, and no prior Section 232 or national security determination has treated musical instruments this way. These instruments are sold to students, school band and orchestra programs, community ensembles, and professional musicians. The volume of imports reflects demand for music education and performance, and is not a threat to national security or the defense industrial base.

C. Whether Domestic Production Can Meet Domestic Demand

Domestic manufacturers have never produced enough brass-wind instruments to meet total U.S. demand, particularly at the student and school-instrument level. Most student-grade brass instruments sold in the United States are manufactured abroad, while most U.S.-based makers concentrate on higher-priced, master-crafted instruments for advancing and professional players[ii]. This is the functioning structure of the industry: imported instruments give beginners an affordable entry point, and advanced musicians move to purchasing domestically made instruments later in their training.

Because these duties are collected from the importer of record, U.S.-based companies, their subsidiaries, and U.S. retailers would directly bear this financial burden — not foreign manufacturers. A duty applied broadly across imported brass-wind instruments and components would fall hardest on this student and school segment, raising costs for U.S. companies, schools, and families without a matching gain in domestic production or jobs.

D. Effect on the Economy, Including Domestic Industry

American music companies already pay substantial tariffs on brass-wind instruments and components. NAMM reviewed U.S. Census Bureau trade data for HTSUS 9205.10.0040, 9205.10.0080, and 9209.99.4080 from January 2025 through June 2026. Over that period, imports in these categories totaled about $151.1 million, on which importers paid about $22.8 million in tariffs. Roughly $20 million was above ordinary duty rates — a weighted average additional tariff of about 13.2%.[iii]

Brass-wind instruments are usually the largest single instrument purchased by a school band program. A further 25% duty on imported student- and intermediate-grade brass instruments would make these instruments prohibitively expensive for school districts, booster organizations, and families, and the notice does not identify any national security or domestic jobs benefit that would offset this harm.

More broadly, the music products industry is part of a creative economy that the U.S. Bureau of Economic Analysis measured at $1.17 trillion in economic activity, 4.2% of U.S. GDP, and 5.4 million arts and cultural jobs in its most recent data[iv]. America leads the world in school music and music making, and this proposed tariff would directly hurt an area where America leads.

E. Other Relevant Factors

Musical instruments do not belong in the same category as the industrial and infrastructure products also covered by this notice. Including brass-wind instruments alongside these items does not fit the notice's stated national security purpose. NAMM asks that BIS instead use its existing Section 232 Inclusions Process, which is designed for exactly this kind of product-specific question. NAMM is ready to work with BIS through that process, or through direct conversations, and can share data on brass-wind trade, U.S. production capacity, and the impact on schools.

NAMM respectfully requests that BIS decline to include HTSUS 9205.10.0040 and HTSUS 9205.10.0080 within the scope of Section 232 duties and engage directly with NAMM to develop category-specific data on brass-wind trade flows and domestic manufacturing capacity before finalizing any determination.

Thank you for the opportunity to comment.

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[i] Yamaha Corporation, "Choosing a Trumpet: Choosing on the Basis of the Material and the Coating," Musical Instrument Guide.
[ii] Hendrix, PIIE, Aug. 17, 2026.
[iii] U.S. Census Bureau. (2026). U.S. Import Merchandise Trade Data for HTSUS 9205.10.0040. Generated via USA Trade Online. Retrieved August 25, 2026.
[iv] U.S. Bureau of Economic Analysis, Arts and Cultural Production Satellite Account.