

ALERT

Commerce Details Process for Requesting Section 232 Coverage on Additional Automobile Parts

September 17, 2025

The U.S. Department of Commerce has released an Interim Final Rule (IFR) establishing a process for U.S. automobile part producers to request additional parts for inclusion under existing Section 232 Tariffs on Automobiles and Automobile Parts. The first window for interested parties to request additional automobile parts for inclusion under the tariffs opens **October 1, 2025**, and closes **October 14, 2025**, with decisions due no later than **December 14, 2025**.

Separate and distinct from the inclusion process, Commerce is also requesting comments on the IFR, which is scheduled for publication today (September 17, 2025). Interested parties have until **November 1, 2025**, to submit comments on the IFR.

BACKGROUND

President Trump issued Proclamation 10908, *Adjusting Imports of Automobiles and Automobile Parts into The United States*, on March 26, 2025. The Proclamation imposed a 25% tariff on imports of certain automobiles and parts pursuant to Section 232 of the Trade Expansion Act of 1962. It also required that Commerce establish a process for including additional automobile parts within the scope of the tariffs, which is the purpose of the IFR.

SECTION 232 INCLUSIONS PROCESS

Who Can Submit and When:

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Practice Areas

International Trade
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Tariffs & Trade Policy
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For a request to be considered, the requestor must be a domestic producer of automobiles or automobile parts articles, or any industry association representing one or more such producers.

The IFR establishes four annual windows during which Commerce will consider submission requests. Starting on the first day of January, April, July, and October, domestic producers will have two weeks to submit requests for inclusion. Once a submission is accepted, the public version of the request will be posted publicly for a 14-day public comment period. Commerce will have 60 days from the end of the initial submission window to issue its determination.

Submission Requirements:

A valid submission must include the following:

- Clear identification of the requestor;
- Precise description of the automobile part and explanation of why the article is an automobile parts article;
- Eight- or ten-digit U.S. Harmonized Tariff System (HTSUS) classification requested to be included within the scope of the tariffs;
- Pertinent information on the domestic industry affected;
- Statistics on imports and domestic production; and
- A description of how and to what extent imports of the article have increased in a manner that threatens to impair national security or otherwise undermines the objectives set forth in Proclamation 9888, the Automobile Proclamation, or any subsequent proclamation addressing the threatened impairment to national security.

Business confidential submissions must be accompanied by a non-confidential public version, and all requests must be submitted to Commerce via email (AutoInclusions@trade.gov). The request must be submitted in PDF format and must be limited to 30 pages, inclusive of any attachments.

Commerce Assessment Standard:

Commerce will assess each request for: (1) whether the described product at the eight- or ten-digit HTSUS classification is an automobile part; and (2) whether imports of such automobile part have increased in a manner that threatens to impair national security or otherwise undermine the objectives set forth in related proclamations. Commerce will make a positive or negative determination for each request and release a public memorandum articulating its reasons for approving or denying each request.

COMMENTS ON THE IFR

Separately from any requests, parties are also asked to submit comments on the processes and criteria outlined above.

Wiley is well-positioned to assist companies that are interested in participating in this process. Our International Trade and National Security practices have deep experience helping clients navigate global trade and stay ahead of the rapidly changing market dynamics in today's highly volatile environment. With sharp insight into shifting policies in Washington DC and beyond, we deliver strategic guidance to our clients to strengthen their position and seize emerging opportunities.

Cameron Anderson, a Law Clerk in the International Trade practice, contributed to this alert.

Trump Administration Tariff Tracker