



Setting Standards for Excellence

October 19, 2004

Ambassador Robert Zoellick
United States Trade Representative
Washington, DC
FR0439@ustr.eop.gov

Dear Ambassador Zoellick:

This is in response to your *Federal Register* request for public comment on "Enhancing the Transatlantic Economic Partnership".

NEMA is the largest trade association representing the interests of U.S. electrical equipment manufacturers, whose worldwide annual sales exceed \$120 billion. The 400 member companies of NEMA manufacture products used in the generation, transmission, distribution, control, and use of electricity. These products are used in utility, industrial, commercial, institutional and residential installations. The Association's Medical Products Division represents manufacturers of medical diagnostic imaging equipment including MRI, CT, x-ray, ultrasound and nuclear products.

NEMA members already engage in extensive trade with Europe, and we as an association already enjoy excellent, well-established relations with our European counterparts. This said, we are very much concerned about the following existing and potential strictures:

1. Washington and Brussels continue to engage in trade disputes that potentially lead to the imposition of sanctions or penalty duties on a wide range of products, many of which are unrelated to the area of dispute itself. We ask you and your European counterparts to minimize the number of impacted electrical items in such instances.
2. We continue to be concerned about the ongoing development of well-intentioned-but-poorly-thought-out European directives that have significant consequences for manufacturers worldwide. The decisions to launch these directives, as well as any subsequent development of them, need to be conducted in a more transparent manner featuring meaningful participation by all stakeholders, as well as sound scientific consideration.

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3. Likewise, the proceedings of the *de facto* European standards setting bodies CEN and CENELEC are in very much in need of transparency. As stands, non-European bodies are unable to observe or participate.

Thank you for your consideration of these remarks,

Sincerely,

A handwritten signature in black ink, appearing to read 'John Meakem', written in a cursive style.

John Meakem
Manager, International Trade