

N339254

April 18, 2024

CLA-2-73:OT:RR:NC:N5:117

CATEGORY: Classification

TARIFF NO.: [7312.10.7000](#); [9903.88.03](#)

Steven B. Zisser
Zisser Customs Law Group
9355 Airway Rd.
San Diego, California 92154

RE: The tariff classification of stranded wire rope/cable from China

Dear Mr. Zisser:

In your letter dated April 2, 2024, you requested a tariff classification ruling on behalf of your client, Hsin Chong Ming Fong (HCMF) Group.

The product under consideration is described as stranded wire cable used in a window regulator pulley system. Based on the information provided, this galvanized nonalloy steel stranded wire rope/cable consists of strands of wire that are wound together concentrically in a helix and wrapped around a wire strand core (WSC). There are 8 strands per wire rope/cable with each strand consisting of 7 wires. The stranded wire rope/cable is covered with a rubber sleeve, fitted with fittings on each end, and has not been electrically insulated.

You suggest classification of the stranded wire rope/cable in subheading 7312.10.2000, Harmonized Tariff Schedule of the United States (HTSUS), which provides for Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Stranded wire: Other: Fitted with fittings or made up into articles. However, based on the construction of the product (i.e., wires, strands, and a core), we find the subject merchandise to be wire rope/cable and not stranded wire as you suggest.

The applicable subheading for the stranded wire rope/cable will be [7312.10.7000](#), HTSUS, which provides for Stranded wire, ropes, cables, plaited bands, slings and the like, of iron or steel, not electrically insulated: Stranded wire, ropes and cables: Ropes, cables and cordage other than stranded wire: Other: Fitted with fittings or made up into articles. The rate of duty will be free.

Pursuant to U.S. Note 20 to Subchapter III, Chapter 99, HTSUS, products of China classified under subheading [7312.10.7000](#), HTSUS, unless specifically excluded, are subject to an additional 25 percent ad valorem rate of duty. At the time of importation, you must report the Chapter 99 subheading, i.e., [9903.88.03](#), in addition to subheading [7312.10.7000](#), HTSUS, listed above.

Duty rates are provided for your convenience and are subject to change. The text of the most recent HTSUS and the accompanying duty rates are provided at <https://hts.usitc.gov/current>.

The holding set forth above applies only to the specific factual situation and merchandise description as identified in the ruling request. This position is clearly set forth in Title 19, Code of Federal Regulations (CFR), Section 177.9(b)(1). This section states that a ruling letter is issued on the assumption that all of the information furnished in the ruling letter, whether directly, by reference, or by implication, is accurate and complete in every material respect. In the event that the facts are modified in any way, or if the goods do not conform to these facts at time of importation, you should bring this to the attention of U.S. Customs and Border Protection (CBP) and submit a request for a new ruling in accordance with 19 CFR 177.2. Additionally, we note that the material facts described in the foregoing ruling may be subject to periodic verification by CBP.

This ruling is being issued under the provisions of Part 177 of the Customs Regulations (19 C.F.R. 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, contact National Import Specialist Denise Hopkins at denise.hopkins@cbp.dhs.gov.

Sincerely,

Steven A. Mack
Director
National Commodity Specialist Division