



August 22, 2017

Honorable Lisa R. Barton
Secretary
U.S. International Trade Commission
500 E Street, SW, Room 112A
Washington, DC 20436

Re: Section 201 Petition on Crystalline Silicon Photovoltaic Cells and Modules

Dear Secretary:

The undersigned domestic solar manufacturers would like to express our opposition to the Section 201 Global Safeguard petition brought by Suniva and joined by SolarWorld that seeks trade impositions on the import of crystalline silicon (c-Si) photovoltaic cells and modules.

Our companies and our domestic suppliers below support more than 5,700 manufacturing workers across the United States manufacturing the mounting equipment that literally holds solar energy systems together. In contrast, Suniva and SolarWorld combined currently employ fewer than 500 workers and falling.

The American solar industry, and our companies, have experienced remarkable growth in recent years such that solar was the top source of new electricity generating capacity in the U.S. last year. We want that success to continue, along with the jobs and economic benefits it brings. We have high expectations for the continued success of our solar manufacturing companies as part of the upward trajectory of the American solar industry.

We make competitive, innovative, high-quality products in the U.S. for U.S. customers. However, the remedies sought by the two petitioners pose a major threat to our U.S. businesses. If end customers face higher prices for PV modules because of a new trade barrier, demand for solar energy systems built with our domestically manufactured products (and, thus, U.S. jobs) will be severely damaged.

The solar industry is fundamentally different from both consumer products and other durable goods. If someone needs to buy tires, they can only put off the decision for so long. Few homeowners, businesses or utilities *need* to buy solar, although millions *want* to buy solar. There are many other highly competitive sources of electricity (both conventional and renewable) and solar must remain competitive on price to even be considered.

The tariffs requested by Suniva would more than double the price of solar panels in the U.S., undercutting the cost-competitiveness of solar and reversing its high growth trajectory. We would be forced to cut our operations, seriously endangering manufacturing jobs at our factories.

We have been building our companies to meet demand from a large and growing domestic solar market. That market is now under threat. As true U.S. solar manufacturers, and on behalf of our 5,700 workers, we ask that you not grant Suniva's request for global safeguard measures.

Sincerely,



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