September 1, 2017

The Honorable Rhonda K. Schmidtlein, Chairwoman
U.S. International Trade Commission
500 E Street, SW
Washington, DC 20436

Subject: Petition No. TA-201-75 for Global Safeguard Relief Pursuant to Section 201-202 of the Trade Act of 1974 – Crystalline Silicon Photovoltaic Cells and Modules

Dear Chairwoman Schmidtlein:

I am writing on behalf of the executive team at PureSolar, Inc. to file an opinion in regard to the pending Section 201 safeguards case filed by Suniva and SolarWorld Americas. We understand that the petition claims that the sale of foreign photovoltaic cells and modules into the US market is materially harmful to domestic manufacturers.

PureSolar, Inc. is a domestic manufacturer of photovoltaic modules based in Washington State. We contest the claim that the sale of foreign CSPV cells into the United States is harmful to domestic manufacturers, as many domestic module manufacturers do not manufacture cells at all, but purchase them as a raw material required for the production of a solar module. In our experience, sources of domestically produced cells have been extremely limited, and when product is available, high efficiency cells of market standard quality have not been offered for purchase by others. In addition, domestic cell producers have not kept pace with market technology, consistently lagging behind advances offered on the global market. As such, many domestic solar module manufacturers, including PureSolar, have no option other than to rely on the support of foreign cell manufacturers to enable the production of high-performance photovoltaic products that can compete in the marketplace. Tariffs on cells simply increase the cost of our raw materials, complicate our procurement procedures, tie up our capital during extended customs delays, and ultimately hobble our ability to offer price competitive products to our customers.

In short, we strongly dispute the claim that the sale of foreign CSPV cells into the domestic market is harmful to domestic module manufacturers, and we furthermore assert that any tariff or tax levied on foreign CSPV cells is in fact materially damaging to domestic module manufacturers, especially in absence of a reliable domestic source of market standard cells. We urge the committee to take this into account as it considers the above referenced petition.

Thank you for your consideration.

Sincerely,

Richard Phillips, III
President and CEO
PureSolar, Inc.