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September 25, 2025

Robby S. Saunders,
Deputy Assistant Secretary for Technology Security
U.S. Department of Commerce
1401 Constitution Avenue, NW
Washington, DC 20230

Subject: Request for Inclusion of Bicycles, Bicycle Frames, and Certain Bicycle Parts within the Scope of Articles Subject to Section 232 Aluminum and Steel Tariffs

Dear Deputy Assistant Secretary Saunders:

Guardian Bikes writes pursuant to the Notice of the Opening of the Inclusions Window for the Section 232 Steel and Aluminum Tariff Inclusions Process published by the Bureau of Industry and Security on September 17, 2025.

Guardian Bikes requests the inclusion of bicycles, bicycle frames, and certain steel or aluminum bicycle parts within the scope of additional derivative aluminum and steel articles within the scope of the duties. Bicycles and bike frames are made with both steel or aluminum.

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I. Identification of the Applicant

Guardian Bike Company, d/b/a “Guardian Bikes”, is a Delaware domestic corporation headquartered in Seymour, Indiana:

Guardian Bikes
2230 D Avenue East, Suite A
Seymour, Indiana 47274

Founded in 2013, Guardian Bikes is now the trusted U.S. leader in kids’ bicycles, known for its patented SureStop® braking system and uncompromising focus on child safety. Today, Guardian Bikes is the only high-volume, scaled bicycle manufacturer in the United States, bringing back mass bicycle frame production that was lost decades ago.

As a vertically integrated, direct-to-consumer brand, Guardian is pioneering a new model of domestic manufacturing — faster, safer, and proudly American.

II. Precise Definition of the Derivative Article.

- Bicycles and Other Cycles, of steel or aluminum.
- Bicycle frames, of steel or aluminum.

III. HTSUS Classifications

Bicycles and other cycles, of steel or aluminum, classified under:

- 8712.00.15
- 8712.00.25
- 8712.00.35
- 8712.00.44
- 8712.00.48
- 8712.00.50

Bicycle frames, of steel or aluminum, classified under:

- 8714.91.20
- 8714.91.30

- 8714.91.50
- 8714.91.90

IV. Explanation of the Derivative Article

In Headquarters Ruling H302358 (January 23, 2030), U.S. Customs and Border Protection (CBP) affirmed its longstanding precedent that bicycle frames are the “integral part of the bicycle”:

CBP has consistently found that a bicycle frame is an essential component of a finished bicycle imparting its overall shape, size, and character. When assembled together, the other components lost their separate identity and became an integral part of the finished bicycle. In Headquarters Ruling Letter (“HQ”) 735368, dated June 30, 1994, CBP considered the country of origin of bicycles, which were assembled in Taiwan and contained components from various countries. The bicycle tubes and frame were manufactured in Taiwan while the rims were made in France and the seat was made in Italy. All of the components were shipped to Taiwan to be assembled into a finished bicycle. CBP found that the country of origin of the bicycle was Taiwan because the bicycle’s frame made in Taiwan was an essential component of the finished bicycle. CBP noted that even though the other components came from several different countries, they lost their separate identity when they were attached to the frame and became an integral part of the bicycle.

<https://rulings.cbp.gov/ruling/H302358>

Earlier this year, Guardian Bikes announced a \$19 million financing with JPMorganChase to launch the first large-scale bicycle frame manufacturing operation in the United States. See PR Newswire, “Guardian Bikes Powers American Comeback with Nation’s First High-Volume Bicycle Frame Manufacturing Plant” (April 10, 2025).

The new facility—located in Guardian's advanced manufacturing hub in Seymour, Indiana—represents a pivotal step in reshoring a critical industry that was once a cornerstone of American manufacturing but has been nearly entirely offshored for decades.

At its Seymour facilities, metal tubes are laser-cut into frame parts, welded together, painted, and assembled. The facility currently produces 2,000 bicycles per day.

V. Explanation of why the article is a steel or aluminum derivative article, including, to the extent practicable, information on the total value of the article's steel and/or aluminum content as a share of the derivative article's total value;

The majority of weight of a bicycle is either steel or aluminum. Reshoring bicycle and bicycle-frame manufacturing will eliminate over 200,000,000 pounds of imported steel and 40,000,000 pounds of imported aluminum into the United States annually.

Ensuring that U.S. steel and aluminum mills have domestic customers is essential to their industry, as the Department of Commerce has acknowledged. In the report, *The Effect of Imports of Steel on the National Security* (January 11, 2018), when finding that steel was critical to U.S. national security, the Department stated as follows:

Domestic Steel Production Depends on a Healthy and Competitive U.S. Industry

U.S. steel producers would be unable to survive purely on defense or critical infrastructure steel needs. In the steel industry, it is commercial and industrial customer sales that generate the relatively steady production needed for manufacturing efficiency, and the revenue volume needed to sustain the business. Sales for critical infrastructure and defense applications are often less predictable, cyclical, and limited in volume.

Steel manufacturers operating in the United States, however, have seen their commercial and industrial business steadily eroded by a growing influx of lower-priced imported product from countries where steel manufacturing often is subsidized, directly or indirectly.

Historically, before being wiped out by imports, U.S. bicycle manufacturers normally produced their own frames transformed from U.S.-produced steel sheet and strip. (See USITC Publication 1417, "Bicycles From Taiwan", August 1983, page A-5). The steel strip would then pass through a tube mill, which made the steel tubing used in the frames, seat posts, forks, handlebar stems, and handlebars. *Id.* The steel tubes were then cut to appropriate lengths depending on the function and on the size of the frames. *Id.* Bicycle producers formed spokes and nipples from steel wire and roll.

Additionally, fasteners are considered a national security priority, and the bicycle industry is a significant consumer of fasteners in its production. Reshoring bicycle manufacturing will create additional demand for domestically produced fasteners, further strengthening the U.S. industrial base and reducing reliance on foreign sources for these critical components.

VI. Information on the Domestic Industry Affected

How American Bicycle Production Was Lost

From 1947 to 1949, imports accounted for less than 1 percent of domestic bicycle consumption. (See *United States Tariff Commission*, [hereinafter, "Commission"] "Bicycles and Parts: Report on Escape-Clause Investigation Under Section 7 of the Trade Agreements Extension Act of 1951", October 1952, pg. 5). A healthy and competitive domestic producer market supplied a growing industry. As remains the case today, most bicycles were purchased for children, and the number of children aged 8 to 14 was growing rapidly following the end of the war. *Id.*

While bicycles had been subject to a tariff of 30% under the Tariff Act of 1930, the General Agreement on Tariffs and Trade (GATT) slashed the bicycle tariff to an average of 11% (there were different rates depending on the bicycle). *Id.* at 3.

By 1952, bicycle imports had surged from one-percent to over ten-percent of domestic consumption. *Id.* This was not due to superior products from abroad. Rather, as the Commission recorded, "[t]he substantial increase in imports of lightweight bicycles in 1950 and 1951 followed devaluation of the pound sterling (from \$4.03 to \$2.80) in September 1949, which reduced the dollar prices of bicycles imported from the United Kingdom." *Id.* at 7.

By 1955, bicycle imports had captured a staggering 40.6% of domestic sales. (See *United States Tariff Commission*, "Bicycles: Report on Escape-Clause Investigation No. 58", August 1957, pg. 22) The imports, mostly from Europe, were priced lower because European wage rates for bicycle production were less than half that of the United States. (See *USITC Publication 1229*, "The Effectiveness of Escape Clause Relief in Promoting Adjustment to Import Competition, Pg. 45)

As a result of this dramatic surge, the U.S. Tariff Commission did recommend an increase in the tariff to 22.5%, although this was only partially accepted by President Eisenhower, with an exemption for lightweight bikes. This increased tariff, as well as subsequent petitions from the domestic Bicycle Manufacturers Association for higher tariffs and quota, did help reverse the trend and preserve domestic manufacturing. President Kennedy converted the temporary Safeguard tariff relief into an indefinite tariff by modifying the U.S. GATT bicycle tariff concession via Proclamation 3394 on February 25, 1961.

However, this relief would not last. Following President Kennedy's assassination, the Johnson Administration agreed to a staggered reduction of bicycle tariffs beginning in 1968 and concluding in 1972 at a rate of 5.5% for lightweights and 11% for other bike categories.

Also during the 1960s, the domestic bicycle industry was compelled to litigate anti-dumping investigations against bicycle imports from Czechoslovakia, Hungary, and West Germany.

Following the tariff cuts, imports quickly surged, returning to their 40% capture of domestic sales.

Between 1970 and 1972, Taiwanese bike exports shot up tenfold to surpass a million units, most of them bound for the United States. Canada enacted anti-dumping measures in the mid-1970s which effectively shut off the Canadian market for Taiwanese exports, increasing the pressure on the U.S. market. In the late 1970s and early 1980s, imports steadily took market share from domestic production. Anti-dumping litigation by the U.S. industry against bicycle imports from Korea and Taiwan was unsuccessful in 1982, and by 1985, imported bike numbers surpassed domestic production.

In the early 1990s, China became a new force in the global bike market. Under the new style of Chinese private enterprise emerging under Deng Xiaoping in the 1990s, China's manufacturing industry was heavily subsidized and required to ramp up production and exports in many industries. Dozens of new Chinese bicycle factories benefited from government subsidies, from subsidized steel as Beijing poured billions into building the world's largest steel industry, from subsidized land as Beijing pushed provincial and local governments effectively to give away land to companies that committed to build factories, and from Chinese wages that according to one 1990s estimate were between 25 and 41 cents an hour in bicycle plants.

Hope was briefly available in 1995 after the Department of Commerce made a preliminary determination that imports of bicycles from China were being dumped in the United States. However, despite some dissent, a majority of the U.S. International Trade Commission determined that Chinese bicycles were not being dumped and were not causing material harm to the U.S. bike industry. (USITC, Investigation No. 731-TA-731, "Bicycles From China"). This investigation was muddled as three domestic bicycle producers - Huffy, GT, and Raleigh - had already begun importing bicycles from China.

By 1999, the three remaining major U.S. bike manufacturers had shut down their U.S. manufacturing operations, laying off thousands of employees. Smaller manufacturers followed suit. Today the Schwinn and Murray brands are owned by Pon Holdings (a European company) and its bikes are manufactured primarily in China. On August 16, 2004, Huffy Corporation filed for bankruptcy. The brand is now owned by a financial conglomerate called United Wheels based in Hong Kong and China.

VII. Statistics on Imports and Domestic Production

Imports

The U.S. Census tracks imports of finished bicycles under HTSUS 8712 by number (no). The **total number of finished bicycles imported in 2024 was 11,036,119 bicycles** and other cycles

("other cycles, presumably mostly tricycles, were 229,949 of this total). Between 2017 and 2023, annual imports averaged closer to 15 million bicycles.

As of July 2025 Census data, 2025 bicycle imports are somewhat below 2024 imports year-over-year:

- January to July 2024: **6,303,133 finished bicycles** or other cycles (112,858 were "other cycles", presumably mostly tricycles).
- January to July 2025: **5,177,191 finished bicycles** or other cycles (154,520 were "other cycles", presumably mostly tricycles).

Anyone seeking to make bicycles in America using American steel for the frame faces severe competition from subsidized foreign imports, particularly from China. An astonishing ~86% of all bikes sold in the United States were imported from China in 2024. This is the reality, despite Normal Trade Relations tariffs ranging from 3.3% to 11% in HTS 8712, as well as the supplemental 25% tariff on bicycles from China as part of the Section 301 action.

Domestic Production

Guardian's manufacturing capacity:

- Guardian Bikes' Seymour, Indiana Facility: Guardian Bikes is already employing over 250 workers nationwide and currently assembling bicycles in Seymour, Indiana.
- Guardian Bikes will produce approximately 500,000 bikes in 2025, but domestic production remains a fraction of total U.S. consumption of over 10,000,000 bikes annually.
- In the summer of 2025, Guardian began expanding operations by launching a new bicycle frame manufacturing line to produce U.S.-made frames with U.S.-steel, investing in robotic welding and advanced laser-cutting technology.
- Existing U.S. Supply Chain: Guardian Bikes owns fulfillment facilities in Sacramento, CA; Frackville, PA; Seymour, IN; and will be opening a new facility in Dallas, TX in 2025. This strategically positioned distribution network enables efficient movement of goods across the U.S., reducing shipping lead times and optimizing logistics.

Pertinent Statistics on Imports and Domestic Production

1. The U.S. imports approximately 100,000 tons of steel annually from imported children's bicycles alone, with an average of 20 lbs of steel per bike.
2. Reshoring bicycle frame manufacturing adds new tonnage of steel and aluminum to the domestic supply chain that was previously imported.
3. The U.S. imports over 97% of bicycles and bicycle frames, mainly from China and Southeast Asia.
4. Importing 15 million bicycles annually requires approximately 53,333 forty-foot high cube containers, contributing to significant environmental impact from transoceanic shipping and additional profits for Chinese shipping companies.

5. Chinese imports benefit from state subsidies and non-market practices, leading to dumping and price distortions.
6. The reshoring of bicycle assembly and frame manufacturing operations will drive more reshoring of the bike supply chain (handlebars, rims, tires, spokes, hubs, etc.)

The domestic manufacturing sector holds untapped potential to support high-volume bicycle production. A scaled domestic supply chain for bicycles will spur demand for domestic steel and aluminum, as well as metal fabrication, welding, tool and die making skills necessary for Reindustrializing the nation. Many existing machine shops and component suppliers currently serving the U.S. automotive industry are well-positioned to transition into manufacturing precision high-volume metal fabrication, welding, and component production could be leveraged to rapidly scale domestic bicycle component manufacturing.

VIII. How Imports Threaten to Impair National Security and Undermine the Objectives Set Forth in the 2018 Steel and Aluminum Section 232 Investigations

- Chinese and Southeast Asian manufacturers dominate U.S. bicycle sales through low-cost mass production, state-backed financing, and tariff loopholes.
- China supplies a significant percentage of aluminum and steel bicycle frames, often undercutting U.S. manufacturers by an estimated 50%-90% in pricing.
- Failure to include bicycle and bike frames as part of the Section 232 Steel and Aluminum tariffs on complete bicycles and frames gives foreign suppliers a strategic cost advantage.
- Following the Section 301 action on imports from China in 2018, Chinese bike manufacturers promptly moved final assembly to evade the tariffs. As the *New York Times* reported: “Chinese bicycle factories moved their final manufacturing and assembly operations out of China, setting up new facilities in Taiwan, Vietnam, Malaysia, Cambodia and India. Using parts mostly from China, those companies made bicycles that they could export directly to the United States – without paying the 25 percent tariff had the bike been shipped straight from China.” See Ana Swanson, “Chinese Companies Have Sidestepped Trump’s Tariffs. They Could Do It Again.” *N.Y. Times*, Dec. 31, 2024.
- As has been seen in other industries, from solar to kitchen cabinets, supplemental tariffs applied only against Chinese imports are insufficient to sustain domestic production. If the tariffs are sufficiently high, but for China only, then firms will rapidly move production to third countries while still benefiting from subsidized Chinese inputs as well as existing distribution and sales channels.

The Effect that Imports May Have Upon the Restoration of Domestic Production Capacity in the Event of a National Emergency

- Dependence on foreign-manufactured bicycles and frames limits the ability to scale production for emergency transportation needs, including military, disaster relief, and public health initiatives.
- A domestic supply chain ensures continuity in the event of global disruptions, trade disputes, or conflicts that impact imports.

Employment and Special Skills Involved in Domestic Production

- Frame manufacturing requires high-precision welding, machining, and engineering skills, fields that are crucial to U.S. industrial capability.
- Guardian Bikes is investing in robotic welding and high-tech manufacturing, creating high-paying U.S. jobs in advanced manufacturing.
- Workforce expansion in Seymour, IN, aims to train the next generation of skilled workers in precision metal fabrication.
- Historically, bicycle manufacturing paid workers higher wages than the manufacturing sector writ large. (See United States Tariff Commission, "Bicycles: Report on Escape-Clause Investigation No. 58", August 1957, pg. 14)

Extent to Which the National Economy, Employment, Investment, Specialized Skills, and Productive Capacity is or Will Be Adversely Affected

- Having a skilled workforce in welding and metal stamping not only supports bicycle manufacturing but also strengthens the industrial base necessary for wartime production, should the need arise.
- Tariff-free and low ad valorem duty imports stifle U.S. investment, as unfair pricing makes domestic production uncompetitive.
- Guardian Bikes' investment in frame manufacturing represents a multi-million-dollar commitment, but the industry needs tariff support to scale successfully.
- Local economies benefit from reshoring production. Additional tax revenues include income & payroll tax revenue for federal and state governments, and property tax revenue for state and local governments.

Revenues of Federal, State, or Local Governments Which are or May Be Adversely Affected

- Low-tariff bicycle and frame imports reduce U.S. tariff revenues, as manufacturers shift production to lower-cost, non-market economies.
- Increased domestic production would generate higher tax contributions and boost economic activity within key manufacturing states.

National Security Supporting Uses of the Article

- Bicycles serve as critical transportation assets for emergency response, urban mobility, and military applications in field operations.
- The ability to rapidly manufacture and deploy bicycles domestically ensures resilience against global trade disruptions.

Any Other Information or Advice Relevant and Material to the Subject Matter of the Investigation

- The steel Section 232 action affected certain bicycle inputs, such as steel bicycle chains (HTS 7315.11.0010). It is counterproductive to admit finished articles that include covered steel items at a lower duty than that steel items. This is known as 'tariff inversion'. Adjusting imports with the proposed tariff adjustment below will correct this tariff inversion.
- Electric bicycles (HTS 8711.60) were added to the Steel 232 as part of the May 2025 Inclusion Round. Electric bicycles should also be on the Aluminum list, and it makes sense to put regular bicycles and other cycles on both the Steel and Aluminum lists as well.

IX. A Note About Effective Tariff Relief

The history of the bicycle industry described above demonstrates the failure of country-specific trade remedies. The only tariff that provided any relief for domestic production was the increased global tariff of the late 1950s and early 1960s.

While "whack-a-mole" is a pervasive problem with country-specific tariffs, the problem is especially acute for bicycles. Customs rulings hold that the bicycle frame is the component that gives a bicycle its "essential character". For this reason, a bicycle frame made in, for example, Cambodia, with Chinese steel, can then be re-shipped back to China for assembly with all other bicycle components, then shipped directly to the United States as a "Product of Cambodia" bicycle. This is why tariffs on both the bicycle frame and finished bicycles should go together, and apply globally.

Ad valorem versus Specific Tariffs

Including bicycles in the covered derivative lists for both the Steel and Aluminum 232 actions is justified for all the reasons outlined above. And, hopefully, it will provide some relief.

However, the current rate and formula for customs valuation - 50% ad valorem on the metal content, and any applicable IEEPA tariff on the non-metal content - will certainly fail to protect the majority of imports, which consist of inexpensive, high-volume bicycles.

In July 2025, the U.S. census recorded 387,528 bicycles imported under HTSUS 8712.00.15.10 (bicycles with wheel diameters not exceeding 50 centimeters). This category sees more import volume than any other of the HTS categories under heading 8712. And the July 2025 volume was an increase over July 2024, before Liberation Day tariffs.

The value of those imports in June 2025 was \$10,414,718, meaning the average import value of these bicycles was an astonishingly low \$26.87 per bicycle.

Even if the 50% steel and aluminum tariff was applied against the bike's transaction value (which would be higher than what the overseas fabricator claims to have paid for the steel or aluminum content under the current valuation approach), then the average duty owed would be a mere \$13.44. This is insufficient to reshore production and sustain capacity and demand for bicycles made with American steel and aluminum.

For this reason, Guardian Bikes urges the Department of Commerce to give consideration to applying a 'Specific Tariff' against bicycle imports as part of any future modifications to the steel and aluminum actions.

This approach ensures that imported bicycles reflect the true cost of fair competition while encouraging domestic production.

X. Conclusion

Guardian Bikes urges the Department of Commerce to give special consideration to the bicycle manufacturing industry as part of its industrial base Section 232 review. Including bicycles in the Steel and Aluminum Section 232 Actions will promote fair competition, enhance domestic supply chain security, and support national interests. Reshoring efforts are already underway, and appropriate tariff action will cement the U.S. as a leader in sustainable, high-quality bicycle production.

Sincerely,

Brian Riley

Co-Founder and CEO

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