

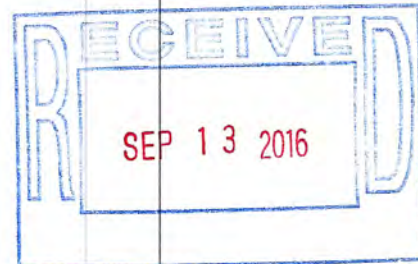
Justin Jeffers
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August 4, 2016

Andrew McGilvray
Executive Secretary & Staff Director
FTZ Board, U.S. Department of Commerce
1401 Constitution Ave., NW Room 2111
Washington, D.C. 20230



RE: FTZ Production Notification
MTD Consumer Group Inc.
Foreign-Trade Zone No. 158

Dear Mr. McGilvray:

As the proposed operator of a Foreign Trade Zone within General Purpose Foreign Trade Zone (FTZ) No. 158, MTD Consumer Group Inc. ("MTD" or the "Company") respectfully submits the attached FTZ Production Notification in accordance with 15 C.F.R. § 400.22.

MTD, based in Valley City, OH, sells products such as lawn mowers, trimmers, snow throwers, tillers, leaf blowers and chainsaws. The address of the MTD facility subject to this FTZ Production notification is 5484 Highway 145 South, Verona, MS 38879, within FTZ 158, site 17.

The Grantee of FTZ 158, Greater Mississippi Foreign-Trade Zone, Inc., has authorized the submission of this FTZ Production Notification. The authority being requested is for the manufacturing, assembly, packaging, quality control and general distribution of imported and domestic outdoor landscaping equipment and parts. For example, MTD will admit equipment parts into the FTZ site under Harmonized Tariff Schedule of the United States (HTSUS) classifications listed in response to Question 4 of this notification. MTD will then assemble imported parts together with domestic components either purchased or manufactured on site from domestic steel. This assembly process will cause a tariff shift as the resulting finished product is classified differently from the imported components (as listed in response to Question 4.)

MTD has provided information in the application form about its background and operations regarding the finished components and parts that will be used in production. We appreciate your consideration of the application. If you have any questions, please do not hesitate to contact me at (330) 558-3304 or Amie Ahanchian of KPMG at (202) 533-3247.

Sincerely,

Justin Jeffers
Import/Export Manager
MTD Consumer Group Inc.

Cc: CBP Officer Mary Perry, CBP Memphis
CC: Wayne Mansfield, President of the Greater Mississippi Foreign-Trade Zone (Grantee FTZ 158)



Notification Requesting FTZ Production Authority

Grantees or operators may submit production notifications to the Board's Executive Secretary. If an operator submits the application, it must also provide a copy to the grantee. The grantee or operator submitting the notification must at the same time provide a copy to the U.S. Customs and Border Protection (CBP) office with oversight responsibility for the zone.

To help us review your notification as quickly as possible, please include the question number and the text of the question prior to your response to each question. If you have questions, contact the FTZ Board staff at (202) 482-2862.

Company and FTZ Site(s)

1. State a) the FTZ user (company for whose benefit the activity would be conducted) and b) the zone/subzone locations (including site numbers) at which the activity would be conducted.

a) MTD Consumer Group Inc. ("MTD") the proposed FTZ operator, will also be the user.

b) MTD intends to activate a site within the boundary of FTZ 158. Upon Activation, MTD intends to manufacture products in the FTZ, but will admit foreign-status components in domestic/duty-paid status until/unless it receives FTZ authority for all or part of requested authority. The address of the MTD facility subject to this FTZ Production notification is 5484 Highway 145 South, Verona, MS 38879, within FTZ 158, site 17.

Proposed Activity

2. Provide a short summary (generally no more than a few paragraphs) of the activity that you propose to conduct under FTZ procedures.

MTD manufactures various landscaping machinery at the proposed site including products such as lawnmowers, leaf blowers, trimmers, tillers, and snow throwers. MTD manufactures steel components on site from domestic rolled steel. The Company also imports various parts and components that are combined with domestic parts and components to produce the finished goods. MTD may also import finished goods at the proposed site. Other activity conducted at the site may include receiving, sorting, storage, quality control, labelling, packing and shipping.



Products and Components

3. Are any of the listed foreign-status component/inputs subject to a trade-related measure or proceeding (such as an AD/CVD order or proceeding, suspension of liquidation under AD/CVD procedures, or Section 201/204/337/421 investigations)? If yes, explain.

None of the listed foreign-status components are subject to a trade-related measure or proceeding. MTD notes that it imports textile grass catchers under HTS 5911.90. MTD understands that textile products generally are not approved however the Company notes that STIHL Inc., a direct competitor to MTD, received approval for the same product in 2009 (Board Order 1612, Docket # 56-2008). MTD further notes Husqvarna Outdoor Products, Inc. another direct competitor, has also received approval for the same product in 2008 (Board Order 1585, Docket #26-2008).

4. Using the tables that follow (inserting additional rows, as needed), list the finished products and foreign-status components/inputs that you propose for production under FTZ procedures. Your list of finished products and foreign-status components/inputs should encompass both actual/planned activity and potential activity for which you request authority. Any FTZ Board authorization of the activity in your notification would only extend to the specific finished products and foreign-status components/inputs listed in your notification (that is, your "scope of authority"). For each finished product and foreign-status component/input, provide a physical description (not the description from the HTSUS), 6-digit HTSUS number, and current U.S. duty rate.

Finished Products:

Physical Description	HTSUS No.	Duty Rate
Water Pumps	8413.60	Free
Blowers	8414.59	2.3%
Power Washers	8424.30	Free
Tillers	8432.29	Free
De-thatchers	8432.80	Free
Aerators	8432.80	Free
Snow Throwers	8430.20	Free
Walk Behind Mowers	8433.11	Free
Mower attachments	8433.20	Free
Edgers	8436.80	Free
Wheeled String Trimmers	8436.80	Free
Chippers	8436.80	Free
Shredders	8436.80	Free
Chipper/Shredder/Vacuums (CSV)	8436.80	Free
Log Splitters	8465.96	2.4%
2 Wheel Tractors	8701.10	Free

Foreign Status Components:

Physical Description	HTSUS No.	Duty Rate
Plastic, Flexible Hoses	391731	3.10%
Polyvinyl Chloride tubes	391739	3.10%
Plastic adhesive Labels	391990	5.80%
Plastic Bagger Cover Panels	392690	5.30%
Rubber V-Belts	401032	2.80%
Rubber Tire Inner Tubes	401390	3.70%
Rubber O-Rings	401693	2.50%
Rubber oil seals	401693	2.50%
Rubber water seals	401693	2.50%
Rubber Plugs	401699	2.70%
Cardboard Retail Cartons	481910	Free
Textile Grass Catcher Bags	591190	3.80%
Steel Hydraulic Fittings	730792	6.20%
Steel Control Cables	731210	Free
Steel Screw Ring	731813	5.7
Steel Hexagonal head bolts	731815	Free
Steel Nuts	731816	Free
Steel Washers	731822	Free
Steel Pins	731829	2.80%
Steel Springs	732020	3.90%
Steel Mower Blades	820840	Free
Metal Frame Brackets	830249	5.7
Gasoline Powered Engines	840790	Free
Engine Shrouds	840991	2.5
Hydraulic cylinders	841221	Free
Reciprocating positive displacement pumps	841350	Free
Hydraulic fluid power pumps	841360	Free
Pump Parts; including ports, bodies and cores	841391	Free
Wheels for leaf blowers	841490	4.70%
Hydraulic Fluid inlet filters	842129	Free
Air Cleaners	842131	2.50%
Pressure washer spray guns	842420	Free
Pressure washer nozzle fittings with quick connect	842490	Free
Pressure washer nozzle extension tubes with quick connect	842490	Free
Snow Thrower Wheels	843149	Free

Block joint assemblies for snow thrower	843149	Free
Tiller tine assemblies	843290	Free
Tiller handle assemblies	843290	Free
Tiller handle covers	843290	Free
Tiller tines	843290	Free
Tiller bails	843290	Free
Tiller drive handles	843290	Free
Tiller handle height adjuster plates	843290	Free
Lawn mower wheels	843390	Free
Water nozzle adapters for lawn mower decks	843390	Free
Blower chutes for lawn mowers	843390	Free
Wheeled string trimmer bodies	843699	Free
String Trimmer handles	843699	Free
Log splitter wheels;	846692	4.70%
Hitch coupling assemblies for log splitters	846692	4.70%
Steel screens for wood chippers	843699	Free
Wedges for wood chippers	843699	Free
Edger wheels	846799	Free
Manual Directional valves for hydraulic fluid on log splitters	848120	2%
Valve parts for log splitters	848180	2%
Radial ball bearings	848210	9%
Transmission shafts	848310	Free
Transmission cranks	848310	Free
Transmission assemblies	848340	2.50%
Worm gears	848340	2.50%
Pulleys	848350	2.80%
Gearbox housings	848390	2.50%
Permanent magnets of metal	850511	2.10%
Motor starters	853650	2.70%
Axles for 2 wheel tractors	870899	Free
Wheel Barrow/cart Wheels, with tires	871690	3.10%