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The Honorable Howard W. Lutnick
Secretary of Commerce
U.S. Department of Commerce
1401 Constitution Ave., N.W.
Washington, DC 20230

Attn: Stephen Astle
Director, Defense Industrial Base Division
Office of Strategic Industries and Economic Security
Bureau of Industry and Security
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**Re: Request for Comments: “Notice of Request for Public
Comments on Section 232 National Security Investigation
of Imports of Robotics and Industrial Machinery
Docket No. BIS-2025-0257, XRIN 0694-XC138**

Comments of The Vision Council

The Vision Council (“TVC”) appreciates the opportunity to comment on the Department of Commerce’s ongoing Section 232 investigation into imports of robotics and industrial machinery. Serving as the global voice for vision care products and services, including optical laboratories, The Vision Council is a nonprofit organization representing the manufacturers, suppliers, and retailers of the optical industry through education, advocacy, and consumer outreach. Our members include companies that manufacture, import, and distribute prescription and non-prescription spectacle lenses, prescription eyeglasses, spectacle frames, non-prescription sunglasses, non-prescription reading glasses, contact lenses, low vision products and industrial machinery used to make these devices, as well as optical retail companies that sell these devices, which are for the most part Class I medical devices regulated by the U.S. Food and Drug Administration (“FDA”). As such, industrial equipment necessary to manufacture optical medical devices serve

as necessary role in producing the optical devices critical for maintaining vision health, workplace safety, and overall quality of life for millions of Americans.

The membership of TVC supports the goal of protecting the national security of the United States. We do not, however, believe that the security interest of the United States is threatened by industrial machinery used to create optical-related medical devices or the instruments used in the diagnosis of eye and optical conditions. For the following reasons we submit that any additional duties brought on by a Section 232 findings would not further that goal but rather will harm public health outcomes by imposing additional costs and restrictions on optical healthcare.

Arguably, optical products are the most widely used medical device in the United States, if not the world. Approximately sixty-five percent of the U.S. population wears prescription eyeglasses and over eighty-one million pairs of new eyeglasses were dispensed last year to Americans to help them see better. Eyeglasses consist of prescription lenses and spectacle frames, with most of these components produced outside the United States. Similarly, over 19 percent of Americans use contact lenses to correct vision deficiencies. Sixty one percent of Americans own nonprescription sunglasses to protect their eyes from harmful ultraviolet light and to reduce glare. Thirty percent of U.S. citizens wear over-the-counter reading glasses, another medical device that aids reading where magnification is required. Lastly, approximately two percent of all Americans have a visual disability or suffer “low vision.” Low vision is a medical term that characterizes visual impairment that cannot be corrected with traditional eyeglasses, contact lenses, medication or eye surgery. People with visual acuity worse than 20/70 in their better eye suffer from low vision, as do individuals with tunnel vision, blind spots, or legal blindness.

Industrial machinery used for manufacturing finished eyewear products is varied but the following classes reflect many of the more important machines:

- **CNC milling machines** – for cutting acetate, titanium, and metal frames.
- **Lens cutting and edging machines** – for shaping lenses to prescription specifications.
- **Injection molding machines** – for plastic and polycarbonate frames.
- **Polishing and coating systems** – for applying anti-reflective, UV, and scratch-resistant coatings.
- **Automated assembly machines** – for assembling hinges, nose pads, and temple arms.

Additional duties on these types of industrial machines will result in higher costs for these machines, which will ripple through the supply chain and create higher prices paid by patients who require optical products to remediate mild to serious vision issues. This cost burden will result in fewer individuals correcting their vision deficiencies.

In turn, this will have a negative impact on public health, which will run counter to the Administration's goal to "Make America Healthy Again." Eyecare is an essential element for a healthy and successful society. For school-aged children, prescription eyeglasses can be the difference between falling behind and thriving academically. For adults, they are essential tools that enable safe driving, effective job performance, and participation in daily life. Delaying eye exams because of increased costs will result in other eye-related conditions and diseases diagnosed during checkups going undiscovered. This could include cataracts, macular degeneration, corneal ulcers, diabetic retinopathy, color blindness and glaucoma. Additional tariffs on the machines used to manufacture these devices will inevitably ripple through the supply chain and increase the ultimate cost of those devices, which will impact negatively the well-being, functionality, and safety of our communities. This will be especially true for Medicaid recipients, veterans and other vulnerable populations.

From a national security perspective, additional measures such as tariffs or quotas are unnecessary. The major producers of industrial machinery for manufacturing optical medical devices including eyeglasses, sunglasses, reading glasses and low vision devices are Italy, Germany, China and Japan. While China is one source of industrial machinery used in the production of optical medical devices and diagnostic instruments, with its share of the global market estimated at between 20 to 25%, its share lags significantly behind the estimated combined output of Italy, Germany, and Japan (60-75%). The United States ranks below these countries at an estimated 5 to 10%. Italy, Germany and Japan are reliable foreign sources with security interests allied with those of the United States.

Currently, any overreliance on the China market is being addressed via the existing Section 301 duties, the fentanyl IEEPA duties and the reciprocal duties. In turn, increasing the duty exposure on industrial machinery needed for production of optical medical devices from countries that currently do not threaten U.S. security objectives (and which countries are already subject to reciprocal duties) would diminish the impact of the tariffs on Chinese-origin optical medical devices by penalizing production in those security-aligned countries.

TVC does not believe that predatory pricing or overproduction sponsored by a foreign government exists in the market covering industrial machinery used to

produce eyewear. Nor do we believe that the existing supply chain for these machines could be subject to weaponization or exploitation. As mentioned above, the supply chain for industrial machines used in the optical industry is diversified across multiple security-aligned countries, ensuring some level of redundancy, quality control, and logistical resilience. We have seen no evidence of foreign government interference or strategic influence over these machines.

For these reasons, TVC believes that the market for industrial machinery used to produce optical medical devices and diagnostic instruments runs a low risk for weaponization by foreign governments. Our members are interested in protecting their supply chains against such risk by incorporating diversification, including in some circumstances domestic investment. Nevertheless, we believe that industrial machinery used to make optical devices are not the type of importation that should trigger national security concerns. In turn, this means that a Section 232 remedy to safeguard against such concerns is not warranted.

Lastly, we believe that duties or quotas on industrial machinery used to make optical medical devices and diagnostic instruments will not enhance the United States' national security as foreign production of these products does not pose a threat to the national security of the United States for the reasons stated above. As discussed elsewhere in this letter, existing trade policy, exemplified by the Section 301 China and the IEEPA tariffs, has only made these foreign-sourced machines more expensive, which in turn negatively impacts optical healthcare by raising the cost of the medical devices and diagnostic instruments created by this machinery. Eyecare is an essential element of a healthy and successful society, and any additional Section 232 duties assessed against the industrial machinery used to make optical medical devices or diagnostic instruments will only create an additional barrier to Americans receiving that care as those costs get passed down through the supply chain.

For these reasons, we respectfully ask that the Department exclude industrial machinery used to produce eyewear and other optical medical devices and diagnostic instruments from any Section 232 tariffs or quotas resulting from this investigation. The following is a list of optical medical devices by Harmonized Tariff Schedule ("HTS") number that should be excluded from the final determination:

Tariff Number	Equipment	Use
8465.93.00	Lens grinding equipment; lens generators; lens finding machines, lens polisher; lens edgers	Fabrication of prescription lens
8479.89.95	Lens finishing equipment; lens layout equipment; lens tinting equipment; lens coating equipment	Fabrication of prescription lens
8459.61.00	CAD/CAM and CNC Milling Systems	Cutting and shaping acetate, titanium and metal spectacle frames
8477.10.90	Injection Molding Systems	Factory fabrication of a wide variety of plastic and polycarbonate spectacle frames.
8477.20.00	Plastic Extrusion Systems	Factory fabrication of a wide variety of plastic and polycarbonate spectacle frames.
8479.82.00	Industrial Mixers	Factory fabrication of chemical formulations for use as coatings
8479.89.95	Automated Assembly Systems	Factory assembly of piece parts, such as hinges, nose pads, and temple arms into product
8479.89.95	3D Printers	Factory fabrication of a wide variety of optical products, especially plastic spectacle frames

Finally, we urge the Department to implement a broad and transparent exclusion process that allows stakeholders to demonstrate that industrial machinery, including industrial machinery used to produce optical medical devices and diagnostic instruments, included in your Section 232 finding does not impact national security, are already covered by other tariff-based trade measures, and are tied to the health and well-being of the American public. Upon establishing such facts, industrial machinery meeting those criteria should be removed from any remedial measures imposed because of this Section 232 investigation.

Thank you for your consideration of our comments. Please feel free to contact either of us if you require any more information regarding this letter.

Sincerely,



Ashley Mills
Chief Executive Officer

/s/ Omar Elkhatib
Omar Elkhatib
Senior Manager
Government Relations