

October 15, 2025



Under Secretary Jeffrey Kessler
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Re: Notice of Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices

Dear Under Secretary Kessler,

On behalf of MichBio, the biosciences industry association representing Michigan's life sciences and medical technology sector, I appreciate the opportunity to submit comments regarding the Department of Commerce's ongoing Section 232 investigation into the importation of medical devices.

The U.S. medical technology (medtech) industry is a cornerstone of American innovation, economic vitality, and national security. Our nation's medtech ecosystem leads the world in manufacturing, research, and exports—accounting for roughly 70% of the domestic market and generating over \$80 billion in exports annually. These achievements are built upon decades of investment, a robust domestic supply base, and strong trade relationships with trusted allies.

While we recognize the importance of safeguarding national security and ensuring resilient supply chains, the application of tariffs or other trade restrictions on medical devices would have unintended and detrimental consequences for patients, providers, and innovators alike. Imports play a vital and complementary role in meeting U.S. healthcare needs; no single nation has the capacity or expertise to produce the full range of more than two million regulated medical technologies in use today. Moreover, the majority of medtech imports originate from NATO partners and allied countries, with only a small fraction - less than three percent - coming from China.

Increased tariffs on medical devices would raise costs for hospitals, clinics, and patients, undermining efforts to make healthcare more affordable and accessible. Many healthcare facilities, particularly those in rural and underserved communities, already operate on narrow margins and would be unable to absorb additional expenses without compromising patient access.

Further, the medtech industry is among the most research-intensive in the world, investing more than \$20 billion annually in R&D, some 6–8% of its revenues. Tariff-related disruptions and retaliatory trade measures threaten this innovation engine, with cascading effects on job creation, global competitiveness, and patient outcomes.

Michigan is home to a vibrant medtech manufacturing base, employing thousands in high-value, well-paying jobs. Our companies contribute significantly to regional economies and to U.S. export strength.

Across the country, medtech supports over three million jobs in manufacturing, R&D, and supply chain operations. Federal policies should reinforce this success - not penalize it.

In conclusion, the dominance of U.S. medtech is an asset to our national security and economic resilience. The industry's proven ability to respond rapidly to crises - such as during the COVID-19 pandemic - demonstrates that our domestic capacity and international partnerships already ensure a secure and reliable supply of critical medical devices. We urge the Department to avoid actions that could disrupt this uniquely American success story to the detriment of patients, innovation, and economic growth.

Sincerely,

A handwritten signature in black ink that reads "Stephen Rapundalo". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

Stephen Rapundalo, PhD
President and CEO

Serving Michigan's Bio-Industry Since 1993

3600 Green Court, Suite 780 Ann Arbor, MI 48105
(o) 734-527-9150 (f) 734-302-4933 www.michbio.org