

United States International Trade Commission

**Pharmaceutical
Products and Chemical
Intermediates, Fourth
Review: Advice
Concerning the
Addition of Certain
Products to the
Pharmaceutical
Appendix to the HTS**

Investigation No. 332-520

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Pharmaceutical Products and Chemical Intermediates, Fourth Review: Advice Concerning the Addition of Certain Products to the Pharmaceutical Appendix to the HTS

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Abstract

Under the Pharmaceutical Zero-for-Zero Initiative, which entered into force in 1995, the United States and its major trading partners eliminated tariffs on many pharmaceuticals, their derivatives, and certain chemical intermediates used to make pharmaceuticals. The U.S. list of pharmaceutical products and chemical intermediates that are eligible for duty-free treatment under the agreement is presented in the Pharmaceutical Appendix to the *Harmonized Tariff Schedule of the United States*. This appendix is periodically updated to provide duty relief for additional products of this kind, including newly developed pharmaceuticals. This report provides advice on the fourth update to the agreement, in which approximately 735 products are proposed to receive duty-free treatment. In 2009, U.S. imports of products currently included in the Pharmaceutical Agreement totaled over \$85 billion; U.S. exports of such products exceeded \$41 billion. Industry sources provided trade estimates for just 12 percent of the items proposed for addition to the agreement and estimated that the value of U.S. imports for these items alone would total \$440 million in 2010. U.S. exports of the same items would likely reach or exceed \$150 million. Consequently, the U.S. import and export values in 2010 for all of the proposed items would likely be substantially larger than the estimates provided above.

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Executive Summary

In 1995, the United States and 21 other countries agreed to eliminate tariffs on approximately 7,000 pharmaceutical products, their derivatives, and certain chemical intermediates used to manufacture pharmaceuticals. This agreement is known as the Pharmaceutical Zero-for-Zero Initiative. Since the original agreement entered into force, it has been updated three times—in 1997, 1999, and 2006—to expand the list of products that can be imported free of duty. This report provides advice to the United States Trade Representative (USTR) concerning the products proposed for the fourth update.

The list of pharmaceutical products in the Pharmaceutical Appendix (Appendix) to the *Harmonized Tariff Schedule of the United States* (HTS) has grown substantially since 1995. As a result of the first update, 496 items were added to the Appendix. The second update introduced an additional 642 items. The third update added 1,298 items. The current update includes 381 drugs identified by their international nonproprietary names (INNs), 17 prefixes and suffixes to identify derivatives of the INNs, and 354 chemical intermediates. When the current update is completed, the Appendix will include more than 10,000 products. The USTR compiled this list of new products using submissions from U.S. pharmaceutical firms and the other signatory countries.

Pharmaceutical products covered in the Pharmaceutical Zero-for-Zero Initiative can be imported either as bulk active ingredients or in dosage forms that can be packaged for retail sale. Products in dosage form are generally classified under chapter 30 of the HTS, where most of the subheadings are duty-free. Many of the bulk pharmaceutical active ingredients and chemical intermediates are classified under HTS subheadings that also contain non-pharmaceutical products and have rates of duty ranging from 0 to 6.5 percent ad valorem. In order for pharmaceutical products classified under these HTS subheadings to be imported free of duty, they must be listed in the Appendix.

The Appendix consists of three tables. The first table lists the INNs of pharmaceutical active ingredients that are eligible for duty-free treatment. The second table consists of chemical prefixes and suffixes that may be combined with the INNs to specify pharmaceutical derivatives that are also included in the agreement. The third table specifies the chemical intermediates for which duties have been eliminated.

U.S. imports of products included in the Pharmaceutical Appendix totaled over \$85 billion in 2009; U.S. exports of these products exceeded \$41 billion.¹ The pharmaceutical industry has estimated the effect on U.S. imports for only about 12 percent of the items proposed for inclusion in the Appendix. These items alone are expected to account for approximately \$440 million of U.S. imports in 2010. U.S. International Trade Commission staff estimates that U.S. exports of the proposed items will reach or exceed \$150 million in 2010 based on information submitted by the industry. A more precise estimate of imports and exports of items included in this update is not possible for many reasons, including the level of aggregation of many of the HTS provisions, uncertainty about final regulatory approval for many of the drugs, and the high proportion of proprietary data in this industry.

¹ The total value for U.S. imports is the sum of the trade under the specific HTS provisions and trade under the special tracking code for the Pharmaceutical Agreement. Since the tracking code does not apply to exports, the total value presented for U.S. exports under the agreement is a lower bound estimate.

CHAPTER 1

Introduction

Purpose and Scope of Study

During the Uruguay Round trade negotiations, the United States and several of its major trading partners agreed to eliminate tariffs on pharmaceutical products, certain derivatives, and certain chemical intermediates used in the production of pharmaceuticals.¹ This agreement is known as the Pharmaceutical Zero-for-Zero Initiative (Initiative or Pharmaceutical Agreement). Effective January 1, 1995, the Pharmaceutical Agreement eliminated tariffs in signatory countries on approximately 7,000 pharmaceutical products and chemical intermediates for all World Trade Organization members on a non-discriminatory basis. In the Uruguay Round Agreements Act (URAA), Congress authorized the President to grant duty-free treatment to new pharmaceutical products and chemical intermediates through periodic updates to the Pharmaceutical Agreement.² One of the requirements in the URAA is that the President obtain advice from the U.S. International Trade Commission (the Commission or USITC) about the proposed additions.³ This report provides information about pharmaceutical products proposed for the fourth update to the Pharmaceutical Agreement.⁴ As requested by the USTR, the report contains the following information: (1) a summary description of the products currently covered under the Initiative, as set out in the Pharmaceutical Appendix (Appendix) to the *Harmonized Tariff Schedule of the United States* (HTS), and those proposed to be added to that Appendix; (2) an explanation of the relationship between the various elements in the Appendix and the HTS; and (3) an estimate of current U.S. imports and, where possible, current U.S. exports of the products included in the current Appendix and the proposed additions to the Appendix, based on product groupings as necessary.⁵

¹ Originally numbering 22, there are currently 34 signatories to the pharmaceutical agreement: Australia, Canada, the EU-27 (Austria, Belgium, Bulgaria, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the United Kingdom), Japan, Norway, Switzerland, the United States, and Macao.

² Section 111(b) of the Uruguay Round Agreements Act (URAA) (19 U.S.C. §3521(b)).

³ Section 115 of the URAA (19 U.S.C. §3521).

⁴ On March 12, 2010, the United States Trade Representative (USTR) published a *Federal Register* notice (75 Fed. Reg. 11986) requesting public submissions of products to be included in the current update. The list currently under review contains products drawn from these public submissions and from lists of products proposed by other signatory countries. The original agreement has been updated three times—in 1997, 1999, and 2006. The Commission prepared reports for each of the previous three updates.

⁵ A copy of the request letter from the USTR, dated May 27, 2010, is included in appendix A of this report. On August 6, 2010, USTR staff provided the USITC with non-substantive revisions to the list of pharmaceutical products included with the request letter. The revised list is included in appendix A. The *Federal Register* notice of the U.S. International Trade Commission's initiation of this investigation, dated June 15, 2010, is included in appendix B.

Description of Products Covered by the Initiative

Pharmaceuticals (produced by firms in NAICS 3254, “Pharmaceutical and Medicine Manufacturing”)⁶ are used to prevent, diagnose, treat, or cure diseases in humans and animals. Products included in the Pharmaceutical Agreement include dosage-form pharmaceuticals, bulk active pharmaceutical ingredients, and certain chemical intermediates used in the production of pharmaceuticals.

- Dosage-form pharmaceuticals are those that have been prepared in forms, such as tablets or vials, that may be packaged for retail sale. They are generally sold to the final customer either as generic or brand-name products, by prescription or over the counter.
- Bulk active pharmaceutical ingredients are produced or purchased by pharmaceutical firms and further processed into dosage-form products.
- The chemical intermediates included under the Initiative are generally organic chemicals used as inputs in the production of pharmaceutical active ingredients. Chemical intermediates are produced by either pharmaceutical firms or specialty chemicals firms (NAICS 325199, “All Other Basic Organic Chemical Manufacturing”)⁷ and usually used by pharmaceutical firms to produce pharmaceutical products. The closer a chemical intermediate is to the final pharmaceutical, the more likely it is to be produced by a pharmaceutical firm.⁸

Although large firms account for most pharmaceutical production and exports, industry sources indicate that small and medium-sized enterprises that export benefit from the Pharmaceutical Agreement in several ways, including (1) duty elimination, (2) ease of program use, (3) the establishment of a “level playing field,” and (4) the establishment of a consistent trading environment.⁹ A brief profile of certain characteristics of the chemical and pharmaceutical industries is provided in Box 1.1.

⁶ The North American Industry Classification System (NAICS) is the industry classification system used by the U.S. Census Bureau and other statistical agencies. See U.S. Department of Commerce, Census Bureau, *North American Industry Classification System (NAICS)*.

⁷ NAICS 325199 comprises firms primarily engaged in manufacturing basic organic chemical products, excluding aromatic petrochemicals, industrial gases, synthetic organic dyes and pigments, gum and wood chemicals, cyclic crudes and intermediates, and ethyl alcohol. See U.S. Department of Commerce, Census Bureau, *North American Industry Classification System (NAICS)*.

⁸ Pharmaceutical companies may produce final and intermediate products by either fermentation, traditional chemical synthesis, or a combination of the two. Specialty chemical companies that supply intermediates to drug companies generally use traditional chemical synthesis. Future advances in biotechnology may allow more specialty chemicals and pharmaceuticals to be produced via fermentation or enzymatic processes. See USITC, *Industrial Biotechnology*, 2008.

⁹ See USITC, *Small and Medium-Sized Enterprises*, 2010, 5-7.

Box 1.1 Characteristics of the U.S. chemical and pharmaceutical industries

- The pharmaceutical and chemical industries include many large, multinational firms that often have manufacturing facilities throughout North America, Europe, and Asia. In the United States, pharmaceutical production facilities are concentrated in California, New Jersey, New York, and Pennsylvania, while chemical firms have manufacturing plants throughout the country.
- Both industries spend large amounts of money on research and development (R&D), with the amounts increasing annually. The pharmaceutical industry spent an estimated \$65.3 billion on R&D in 2009, up from \$63.7 billion in 2008. In comparison, R&D spending by the U.S. chemical industry, excluding pharmaceuticals, was valued at \$11.7 billion in 2008.
- Much of the R&D spending by the pharmaceutical industry was used in the development of new drugs. Only 1 in every 5,000 pharmaceuticals tested is likely to receive approval from the U.S. Food and Drug Administration (FDA). The average cost of developing a successful new medicine is estimated to be about \$1.3 billion over 10 to 15 years. Since firms in other chemical sectors typically do not face as stringent a regulatory system as pharmaceutical companies do, product development in these sectors is generally faster and less expensive.
- Patent protection is also important to both industries. In the United States, firms receive exclusive rights to sell chemicals or pharmaceuticals for 20 years. However, for pharmaceuticals, the length of the product approval process can significantly reduce the patent holder's period of exclusivity. U.S. patent law thus allows pharmaceutical patents to be extended to offset approval delays when certain conditions are met. After the patent expires, the product may quickly face competition from generic copies.

Sources: Pharmaceutical Research and Manufacturers of America, *Pharmaceutical Industry Profile 2010*, 26, 27; American Chemistry Council (ACC), *Guide to the Business of Chemistry 2009*, 73; 35 U.S.C. § 156.

Most products covered in the Pharmaceutical Agreement are classified in chapters 29 and 30 of the HTS. Dosage-form pharmaceuticals are classified in chapter 30, "Pharmaceutical Products." Most of the bulk pharmaceutical and chemical intermediates are organic chemicals classified in chapter 29 according to their chemical structure, occasionally under 8-digit HTS subheadings specifically applicable to drugs. Many of the bulk active pharmaceutical ingredients are classified under the following headings in chapter 29:

HTS heading 2936	Provitamins and vitamins
HTS heading 2937	Hormones
HTS heading 2939	Alkaloids
HTS heading 2941	Antibiotics

Data for the chemical industry (NAICS 325), pharmaceutical industry (NAICS 3254), and "All Other Basic Organic Chemical Manufacturing" (NAICS 325199)¹⁰ in 2007, the latest year for which data are available from the Census Bureau, are shown in table 1.1. Shipments for the chemical and allied products industry totaled approximately \$723 billion; the pharmaceutical industry accounted for 26 percent of this amount. According more recently published data, the value of shipments for both industries rose steadily

¹⁰ While this category includes most firms that produce chemical intermediates for the pharmaceutical industry, it also includes many firms not connected with producing these products.

during 2001–08.¹¹ A decline in shipments in 2009 was primarily attributable to the global recession. In terms of trade, the pharmaceutical industry accounted for 45 percent of U.S. chemical imports and 25 percent of U.S. chemical exports in 2007. Employment in the pharmaceutical industry accounts for 31 percent of total employment in the chemical industry and 26 percent of its production workers.

TABLE 1.1 U.S. chemical and pharmaceutical industries: Statistics for 2007

Industry	Total shipments ^a	U.S. imports ^b	U.S. exports ^b	Trade balance	U.S. apparent consumption	Total employment ^a	Production workers ^a
NAICS 325: Chemical manufacturing	722.5	160.3	147.4	-12.9	735.5	801.6	463.8
NAICS 3254: Pharmaceutical and medicine manufacturing	188.5	71.8	36.7	-35.2	223.7	250.4	122.0
NAICS 325199: All other basic organic chemical manufacturing	80.5	20.3	29.7	9.4	71.0	68.4	40.8

Source: Official statistics of the U.S. Department of Commerce.

^a U.S. Department of Commerce, Census Bureau, 2007 Economic Census.

^b USITC, DataWeb.

¹¹ Shipments by the chemical industry increased from \$438.4 billion in 2001 to \$750.5 billion in 2008 before declining to \$674.1 billion in 2009. Shipments by pharmaceuticals firms totaled \$130.0 billion in 2001, \$194.4 billion in 2008, and \$190.6 billion in 2009. See ACC, *Guide to the Business of Chemistry 2010*, 14, 38.

CHAPTER 2

Description of the Pharmaceutical Appendix to the Harmonized Tariff Schedule of the United States

There are two ways that pharmaceutical products, their derivatives, and certain chemical intermediates covered under the Pharmaceutical Agreement enter the United States free of duty. The first way involves products listed under most headings in chapter 30 of the HTS (“Pharmaceutical Products”) and under the HTS chapter 29 headings 2936, 2937, 2939, and 2941 (bulk vitamins, hormones, alkaloids, and antibiotics, respectively); for these products, the column 1 general rates of duty were reduced to zero when the Pharmaceutical Agreement went into effect on January 1, 1995.¹ The second way involves bulk active pharmaceutical ingredients and chemical intermediates used in their manufacture that are not classified in the four headings of chapter 29 listed above. These products receive duty-free treatment because they are listed in the Pharmaceutical Appendix to the HTS.

As described in general note 13 of the HTS, a pharmaceutical product or chemical intermediate imported under an 8-digit HTS subheading that has the symbol “K” in the special-rate-of-duty column² is eligible for duty-free treatment only if it is listed in the Pharmaceutical Appendix. The Appendix is necessary for identifying such products because the 8-digit HTS subheadings that have the “K” symbol generally cover a large range of goods, many of which may not be pharmaceuticals or otherwise included in the Pharmaceutical Agreement. The special duty rates are available for imports from all countries eligible for column 1 general rates of duty.³

In other words, when a new pharmaceutical is available for use, it is immediately eligible for duty-free treatment if it is classified in chapter 30 of the HTS because it is in dosage form and/or packaged for sale, or if it is classified as a bulk pharmaceutical under one of the four specified HTS headings in chapter 29 (headings 2936, 2937, 2939, and 2941). However, if this new pharmaceutical is imported in bulk under another HTS heading and is not already included in the Pharmaceutical Appendix, it may be added to the duty-free list in the Appendix only during a periodic update; this is also the situation for chemical

¹ Chapter 30 of the HTS contains pharmaceutical products such as medicaments for human and veterinary use as well as other medical items, such as bandages and surgical equipment. Two subheadings in this chapter are not duty free: 3006.70.00 (“Gel preparations...”), which has a duty of 5 percent ad valorem, and 3006.91.00 (“Appliances identifiable for ostomy use”), which has a duty of 4.2 percent ad valorem. One item in heading 2941 is not free of duty: subheading 2941.20.10 (“Dihydrostreptomycin and its derivatives”) has an ad valorem tariff rate of 3.5 percent.

² Special rates of duty are the rates applied under one or more special tariff treatment programs, such as the Pharmaceutical Zero-for-Zero Initiative or various free trade agreements. See general note 3 of the HTS.

³ There are three additional ways that a product covered by the Pharmaceutical Agreement can enter the United States free of duty: (1) a pharmaceutical or chemical intermediate that originates in a country that is a partner under a free trade or trade promotion agreement may be imported free of duty under that trade agreement rather than the Pharmaceutical Agreement; (2) some items in the Pharmaceutical Appendix may be classified under HTS tariff lines outside of chapter 30 and headings 2936, 2937, 2939, and 2941 that have a column 1 general rate of duty of “Free”; and (3) an item that is covered by one of the temporary duty provisions in chapter 99 of the HTS may be imported under that provision rather than the Pharmaceutical Agreement.

intermediates used to make new pharmaceuticals that are not yet covered by the Agreement.

The Pharmaceutical Appendix to the HTS comprises three tables. Table 1 lists pharmaceuticals by their international nonproprietary names (INNs). The Chemical Abstract Service (CAS) number for the product is also given for most items in this table.⁴ When the Pharmaceutical Agreement originally took effect, table 1 contained the pharmaceuticals listed in the World Health Organization (WHO) proposed INN lists 1–69.⁵ The first three updates of the Pharmaceutical Agreement added INNs from the WHO lists 70–93 to table 1 of the Pharmaceutical Appendix. The proposed update addressed in this report includes 381 products from WHO proposed INN lists 94–99.

Table 2 of the Pharmaceutical Appendix contains prefixes and suffixes that can be combined with the INNs of table 1 to specify derivative products, such as salts, esters, and hydrates, which are also eligible for duty-free treatment. As stated in general note 13 of the HTS, the derivative product formed from a combination of items in tables 1 and 2 must be classifiable in the same 6-digit tariff provision as the original product listed in table 1 in order for it to receive duty-free treatment. Since items in table 1 can be combined with multiple items in table 2 to form derivative products, it is difficult to enumerate the total number of products that may be eligible for duty-free treatment under the Pharmaceutical Agreement. Under the original Agreement, 310 prefixes and suffixes were listed in table 2. The first three updates added a total of 103 items to this table. The current update would add 17 prefixes and suffixes to table 2.

Table 3 lists chemical intermediates used in the production of pharmaceutical products. Most of these chemicals are classified in either chapter 29 or chapter 39 of the HTS; a few are found in chapters 28, 32, 34, and 38.⁶ The Pharmaceutical Agreement originally included over 300 chemical intermediates in table 3. The previous updates added 1,072 intermediates. In the current update, the parties to the Pharmaceutical Agreement propose to add 354 chemical intermediates to table 3.

⁴ The Chemical Abstract Service (CAS), a division of the American Chemical Society, manages CAS numbers, which are unique identifiers of chemical substances. Inclusion of CAS numbers for items in the Pharmaceutical Appendix eases the burden of customs officials examining import documentation by providing an unambiguous way of identifying a chemical product that may have many systematic, generic, proprietary, or common names. Since a CAS number is unique to the chemical it identifies, the CAS number can be linked to the HTS classification of the chemical. U.S. Customs and Border Protection's CROSS database (<http://rulings.cbp.gov/> (accessed August 26, 2010)) links CAS numbers with the appropriate HTS classifications but only covers a small portion of all CAS numbers. The European Commission's ECICS database (http://ec.europa.eu/taxation_customs/dds/cgi-bin/ecics2home?Periodic=0&Lang=EN (accessed August 26, 2010)) maps the CAS number of a chemical to that chemical's appropriate classification in the European Commission's Combined Nomenclature and may cover more CAS numbers than the CROSS database. In some cases, the ECICS database provides information about the molecular structure of the chemical that is helpful to determine how the chemical is classified in the HTS. However, by law, only the U.S. Customs Service is authorized to issue a binding ruling on the classification of a specific chemical.

⁵ WHO proposed INN lists can be found at <http://www.who.int/medicines/publications/druginformation/inlists/en/index.html> (accessed July 8, 2010).

⁶ Chapter 29, where most bulk pharmaceutical products and chemical intermediates are classified, has a total of 973 tariff lines. Of these tariff lines, 271 have a column 1 general rate of duty of "Free" and 325 have the symbol "K" in the special-rate-of-duty column. Most of the products in the current update are likely to be classified in tariff lines that currently have the symbol "K" in the special-rate-of-duty column. However, there are legal procedures by which a new "K" symbol could be added to an existing tariff line if necessary.

CHAPTER 3

Estimates of Current U.S. Trade in the Products Included in the Existing Pharmaceutical Appendix and the Proposed Additions to the Appendix

Total trade in products from HTS chapter 30 and HTS headings 2936, 2937, 2939, and 2941 was valued at more than \$102.0 billion in 2009, an increase from more than \$97 billion in 2008. Much of the increase was the result of growth in U.S. exports in 2009. As the domestic market for chemicals started slowing in early 2008, many companies focused on foreign markets.¹ But by late 2008, these markets started slowing, too. In 2009, imports of many of these products increased, particularly those classified under chapter 30 and those tracked by the “K” special-rate-of-duty code, due in most part to increases in imports from Germany, Singapore, and the United Kingdom; related-party trade also played a role as many of the companies are multinational. Looking at the trade data in more detail for 2008 and 2009, the share of total trade accounted for by chapter 30 increased from 89 percent to 93 percent and the shares of each of the four specified HTS headings of chapter 29 declined. U.S. imports and exports of products classified in chapter 30 increased over the two years. Much of the trade in pharmaceuticals, including imports into the U.S. market, is in products that are shipped to the intended market for final formulation and/or packaging to meet domestic regulations. Table 3.1 provides values of U.S. imports for consumption, domestic exports, and the trade balance for HTS chapter 30 and HTS headings 2936, 2937, 2939, and 2941.²

U.S. imports of products currently listed in the Pharmaceutical Appendix and tracked using the “K” special-rate-of-duty code were valued at approximately \$23.4 billion in 2008 and \$25.2 billion in 2009;³ the ad valorem equivalent tariff rate for these products would have been 6.2 percent in 2009 if they had not received duty-free treatment.⁴ Tables 3.1 and 3.2 present trade data for the products imported under the Pharmaceutical Zero-for-Zero Initiative in 2008 and 2009. The total value of U.S. imports under the Pharmaceutical Agreement in 2009 (\$85.2 billion) can be obtained by adding the value of

¹ USITC, Shifts in U.S. Merchandise Trade 2008, 2009, CH-1–CH-4.

² As noted in chapter 2 of this report, the subheadings in HTS chapter 30 and headings 2936, 2937, 2939, and 2941 are duty-free except for subheadings 3006.70.00, 3006.91.00, and 2941.20.10. Imports and exports for items in these three subheadings are included in the values in table 3.1. In 2009, the value of U.S. imports for consumption came to \$2.5 million for 3006.70.00, \$64.8 million for 3006.91.00, and \$0.4 million for 2941.20.10. Domestic exports came to \$21.9 million for 3006.70.00, \$137.0 million for 3006.91.00, and \$0.3 million for 2941.20.10 in 2009.

³ Equivalent export data are not available because export data are generally aggregated at a higher level than import data and because the preference program and tariff rates only apply to imports.

⁴ The ad valorem equivalent tariff rate for products in the Pharmaceutical Appendix was calculated by dividing the sum of duties that would have been collected in 2009 if the products had not received duty-free treatment by the total value of imports for the products in that year.

“K” code imports in 2009 (\$25.2 billion) and the value of imports classified under chapter 30 and the four specified HTS headings (\$60.2 billion).⁵

TABLE 3.1 Pharmaceutical products covered under chapter 30 and headings 2936, 2937, 2939, and 2941 of the HTS: U.S. imports, exports, and trade balance, 2008–09 (million \$)

Product grouping	2008	2009
U.S. imports for consumption:		
2936	1,185	1,021
2937	1,861	1,271
2939	2,634	937
2941	1,265	912
Chapter 30	52,801	56,027
Total	59,747	60,167
U.S. domestic exports:		
2936	601	507
2937	2,010	2,184
2939	47	39
2941	1,220	718
Chapter 30	33,381	38,416
Total	37,259	41,864
U.S. trade balance:		
2936	-584	-513
2937	149	913
2939	-2,587	-898
2941	-45	-194
Chapter 30	-19,420	-17,611
Total	-22,487	-18,303

Source: Official statistics of the U.S. Department of Commerce.

Because HTS subheadings that have the “K” special-rate-of-duty code cover multiple products, many of which are not included in the Pharmaceutical Agreement, the USITC cannot project the value of eventual trade that may result from the proposed additions to the Pharmaceutical Appendix based on current trade data. The Commission’s *Federal Register* notice for this study requested written submissions containing estimates for future trade in the proposed items.⁶ The USITC received five submissions.⁷ The projections found in these submissions, which included data for about 12 percent of the items in the current update, valued U.S. imports at \$440.0 million for 2010 (table 3.3).⁸ USITC staff estimates that U.S. exports will reach or exceed \$150.0 million for the items covered in these submissions.

Because these trade estimates cover such a small portion of the items proposed for inclusion in the Pharmaceutical Appendix, these data may not adequately reflect the

⁵ While the duty-free treatment under the Pharmaceutical Agreement applies to all countries eligible for the column 1 rate of duty, most U.S. trade in pharmaceuticals and chemical intermediates is with the other 33 signatory countries. The other signatory countries accounted for 83.5 percent of U.S. imports under chapter 30 and subheading 2836, 2937, 2939, and 2941 in 2008 and 82.9 percent in 2009. For U.S. exports of these products, 86.0 percent went to other signatory countries in 2008 and 85.2 percent in 2009. For U.S. imports under the “K” special rate of duty, 91.1 percent originated in signatory countries in 2008 and 84.6 percent in 2009.

⁶ See appendix B.

⁷ The public versions of the four submissions from PhRMA and one submission from Rochem International Inc. are included in appendix C.

⁸ Submissions included data for 89 of the 735 pharmaceuticals and chemical intermediates in the current update. The data on U.S. imports in table 3.3 have been aggregated to prevent disclosure of business proprietary information.

possible size of the trade that might occur when the duties are eliminated. The data are limited for many reasons, including the following:

- (1) Data on many individual products are proprietary and not publicly available;
- (2) Data for bulk pharmaceutical active ingredients are often aggregated with data for chemicals that are not included in the Pharmaceutical Agreement;
- (3) The proposed items may not be traded in the near future or, in fact, at any time (e.g., some may still be awaiting regulatory approval); and
- (4) As mentioned in Chapter 2, estimates cannot be provided for the multitude of possible drug derivatives that may be imported free of duty by combining the prefixes or suffixes from table 2 of the Pharmaceutical Appendix with the INNs listed in table 1.

TABLE 3.2 Products imported at the “K” special rate of duty for pharmaceuticals: U.S. imports for consumption, by six-digit HTS subheadings, 2008–09 (actual \$)

Six-digit HTS subheading	U.S. imports	
	2008	2009
283329	36,866	2,388
284190	28,208	0
284210	135,188	120,562
284290	4,973	36,207
284330	19,563	0
284390	16,640,223	10,284,440
284690	890,973	27,323
290322	373,979	47,614
290339	466,990	588,376
290345	0	0
290346	0	4,590
290347	0	0
290349	1,519,855	3,028,310
290351	0	0
290359	1,102,996	158,878
290362	0	0
290369	128,632	499,844
290410	6,682	0
290490	9,750	88,875
290519	102,415	25,701
290522	57,488	112,289
290529	221,945	0
290539	89,500	89,500
290549	80,052	0
290559	3,275,420	13,884,085
290611	1,772,825	2,414,627
290619	1,834,804	1,842,747
290629	48,279	2,717
290719	305,519	270,807
290729	819,957	525,475
290819	5,111,340	2,169,206
290899	0	288,750
290919	65,660,338	66,337,127
290920	141,960	2,750
290930	54,606	113,407
290949	1,110,289	775,591
290950	28,257,371	28,163,670
291030	42,372	23,000
291090	991,215	0
291100	535,925	1,343,563
291219	7,832,799	11,084,855
291229	247,793	396,355
291249	26,828	12,524
291419	240,449	197,046
291429	748,044	531,093
291439	629,780	117,440
291440	84,941	116,364
291450	39,470,186	37,978,706
291469	53,399,394	40,987,697
291470	1,852,784	2,091,205
291529	258,171	88,903
291539	5,220,675	4,645,396
291540	0	0
291550	0	32,869
291590	34,427,097	29,687,905
291619	413,168	9,551
291620	12,769,068	11,466,001
291631	496,861	560,886
291639	8,960,790	2,027,476

TABLE 3.2 Products imported at the “K” special rate of duty for pharmaceuticals: U.S. imports for consumption, by six-digit HTS subheadings, 2008–09 (actual \$)—*Continued*

Six-digit HTS subheading	U.S. imports	
	2008	2009
291713	5,900	130,757
291719	834,259	148,543
291720	59,108	78,645
291734	230,429	116,184
291739	0	0
291811	34,184	0
291813	51,200	15,848
291816	373,643	295,113
291818	34,431	0
291819	19,968,036	15,325,357
291822	0	0
291823	3,373,893	3,770,195
291829	1,802,019	1,557,797
291830	1,165,355	1,602,548
291899	66,743,722	41,879,898
291910	7,612	0
291990	995,125	520,101
292019	0	180,000
292090	2,425,093	3,655,663
292119	30,864,708	22,230,405
292129	258,647	196,351
292130	1,554,303	4,089,673
292142	598,350	306,956
292143	0	0
292145	0	0
292149	56,387,085	49,713,738
292159	1,455,811	242,695
292211	46,400	26,271
292212	0	0
292219	484,851,037	524,682,337
292229	16,851,716	1,866,046
292239	45,917,788	46,378,435
292241	3,677,154	1,095,896
292242	1,254,874	1,659,219
292243	0	0
292249	795,288,687	831,121,356
292250	432,422,790	394,905,811
292310	1,726,469	2,180,940
292320	3,691,567	667,247
292390	36,658,315	27,604,867
292419	30,600,885	23,642,182
292421	97,235	102,624
292423	4,776	0
292429	236,177,339	277,698,615
292519	434,777	64,005
292529	62,778,275	53,295,344
292690	31,124,331	24,950,913
292700	9,336,363	10,167,851
292800	17,869,129	13,189,570
292990	59,636	53,011
293020	1,933,692	540,096
293030	652,113	596,615
293090	91,862,733	51,648,732
293100	56,978,881	37,567,701
293219	17,738,294	17,832,569
293221	1,140,350	1,403,016
293229	305,209,610	263,259,341

TABLE 3.2 Products imported at the “K” special rate of duty for pharmaceuticals: U.S. imports for consumption, by six-digit HTS subheadings, 2008–09 (actual \$)—*Continued*

Six-digit HTS subheading	U.S. imports	
	2008	2009
293299	251,856,862	246,080,131
293311	35,937	0
293319	144,728	276,170
293321	1,381,895	282,764
293329	255,804,439	46,216,945
293339	1,126,930,720	1,329,460,225
293349	183,315,856	257,218,860
293354	0	12,188
293359	1,036,619,141	1,823,801,500
293369	77,322,319	57,922,230
293379	793,271,828	1,081,461,827
293399	5,052,280,495	6,623,112,632
293410	71,249,516	97,971,013
293420	323,469,449	497,169,066
293430	10,436,097	10,974,260
293499	10,053,206,458	7,453,935,740
293500	794,269,028	2,453,358,006
293810	838,483	1,178,036
293890	7,982,054	7,029,317
294000	30,272,406	23,211,335
294200	8,371,063	7,511,916
300670	28,633	0
320300	940,266	663,778
320413	13,200	35,157
320419	2,344,595	3,859,388
320490	63,565	52,715
340130	70,352	29,209
340213	5,826,792	753,856
340220	45,996	33,663
380850	221,295	163,503
380894	26,250	71,547
382490	41,833,169	43,729,336
390190	1,619	5,496
390290	187,810	125,634
390461	215,249	3,536
390591	265,593	0
390599	9,848,090	9,762,428
390690	2,275,446	1,556,498
390710	23,841	39,934
390720	895,163	2,944,237
390730	785,599	305,817
390760	664,671	268,785
390770	24,875	72,102
390799	103,424	30,484
390810	432,335	98,201
390910	3,554	485,387
390940	148,860	1,054,292
391000	687,357	498,464
391190	1,222,250	2,042,399
391220	28,031	38,640
391231	13,557,755	13,596,805
391239	5,263,255	3,254,414
391290	208,002	79,771

TABLE 3.2 Products imported at the “K” special rate of duty for pharmaceuticals: U.S. imports for consumption, by six-digit HTS subheadings, 2008–09 (actual \$)—*Continued*

Six-digit HTS subheading	U.S. imports	
	2008	2009
391390	13,606,816	12,745,760
391400	35,461,724	39,971,745
Total	23,390,949,661	25,186,118,910

Source: Official statistics of the U.S. Department of Commerce.

Note: Pharmaceutical products and chemical intermediates originating in a country that is a partner under a free trade or trade promotion agreement may be imported free of duty under that trade agreement rather than the Pharmaceutical Agreement. Import data for pharmaceutical products imported under various free trade agreements are not included in this table.

TABLE 3.3 Proposed additions to the Pharmaceutical Appendix to the HTS for which submissions were received: Estimates for U.S. imports, exports, and trade balance, 2010 (actual \$)

Product grouping	U.S. imports ^a	U.S. exports ^b	U.S. trade balance
Proposed additions to the Pharmaceutical Appendix	440,000,000	150,000,000	-290,000,000

Source: Compiled by USITC staff from the submissions of the PhRMA.

^a Estimates include data submitted on 89 of approximately 735 pharmaceutical products and chemical intermediates under consideration. An aggregate estimate for U.S. imports has been reported to protect business confidential information.

^b USITC staff estimate that the value of U.S. exports will reach or exceed this amount. Estimates are based on information submitted by the industry.

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APPENDIX A
USTR Request Letter

EXECUTIVE OFFICE OF THE PRESIDENT
THE UNITED STATES TRADE REPRESENTATIVE
WASHINGTON, D.C. 20508

DOCKET NUMBER	MAY 27 2010
2736	

Office of the Secretary Int'l Trade Commission	

The Honorable Shara Aranoff
Chairman
United States International Trade Commission
500 E Street, S.W.
Washington, DC 20436

Dear Chairman Aranoff:

Opening markets through elimination of tariff barriers has been an ongoing objective of this Administration. As one part of the market access tariff results of the Uruguay Round negotiations, the United States and 21 other Members of the World Trade Organization (WTO) agreed to the reciprocal elimination of duties on approximately 7,000 pharmaceutical products and chemical intermediates used primarily for the production of pharmaceuticals (pharmaceuticals zero-for-zero initiative).

Congress implemented the results of the Uruguay Round negotiations through the Uruguay Round Agreements Act (URAA). In section 111(b) of the URAA, Congress authorized the President to proclaim further modification of any duty for articles contained in a tariff category that was part of a zero-for-zero initiative. The Statement of Administrative Action, which Congress approved in the URAA, notes that the President would use section 111(b) authority to grant duty-free treatment for new pharmaceutical products.

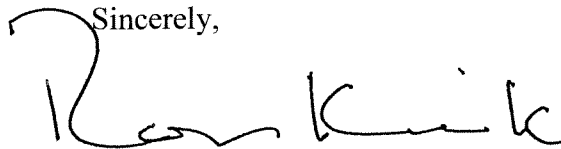
Participants in the pharmaceuticals zero-for-zero initiative have conducted periodic reviews to identify further products that could be covered by this duty elimination initiative. As a result of multilateral negotiations under the auspices of the WTO in 1996, 1998, and 2006, the United States and other participants in the initiative eliminated duties on an additional 496 pharmaceutical items in the first update, 642 pharmaceutical items in the second update, and 823 pharmaceutical items in the third update. The U.S. International Trade Commission has provided critical assistance to the Office of the U.S. Trade Representative USTR in these negotiations and in implementation of their results

Participants in the pharmaceuticals zero-for-zero initiative are conducting a fourth review to determine if products can be added to the initiative. Pursuant to authority delegated to me by the President, I am requesting in accord with section 115 of the URAA and section 332 of the Tariff Act of 1930 that the Commission provide advice to USTR in the form of information on the pharmaceutical products and chemical intermediates proposed for addition to the pharmaceuticals zero-for-zero initiative. Specifically, I request that the Commission provide: (1) a summary description of the products currently covered under the initiative as set out in the Pharmaceutical Appendix to the U.S. Harmonized Tariff Schedule (Appendix) and those proposed to be added to that Appendix; (2) an explanation of the relationship between the various elements in the Appendix and the Harmonized Tariff Schedule of the United States; and

(3) an estimate of current U.S. imports and, where possible, current U.S. exports of the products included in the current Appendix and the proposed additions to the Appendix, based on product groupings as necessary.

If data are not available for certain products, particularly in the case of new products, the advice may be provided in a qualitative form. I request that the Commission provide its advice at the earliest possible date, but not later than September 1, 2010. The Commission's report will be made available to the general public in its entirety. Therefore, the report should not contain any confidential business or national security classified information.

I appreciate your assistance and cooperation on this matter and look forward to working with you and your staff on these issues in the future.

Sincerely,

Ron Kirk

Enclosures:

- Table 1: Pharmaceutical INNs proposed for addition to the Pharmaceutical Appendix
- Table 2: Pharmaceutical prefixes and suffixes proposed for addition to the Pharmaceutical Appendix
- Table 3: Pharmaceutical intermediates proposed for addition to the Pharmaceutical Appendix

Table 1
International Nonproprietary Name (INN) products proposed for addition to the Pharmaceutical Appendix to the Harmonized Tariff Schedule

INN	CAS Number
Abagovomab	792921-10-9
Acridinium Bromide	320345-99-1
Aderbasib	791828-58-5
Adiplon	840486-93-3
Adoprazine	222551-17-9
Afimoxifene	68392-35-8
Aflibercept	862111-32-8
Agatolimod	207623-20-9
Alacizumab Pegol	934216-54-3
Albiglutide	782500-75-8
Albinterferon Alfa-2b	472960-22-8
Alcaftadine	147084-10-4
Aleglitazar	475479-34-6
Aleplasinin	481629-87-2
Alferminogene Tadenovec	473553-86-5
Alipogene Tiparovec	929881-05-0
Almorexant	871224-64-5
Alogliptin	850649-61-5
Alvespimycin	467214-20-6
Amibegron	121524-08-1
Amifampridine	54-96-6
Amolimogene Bepiplasmid	870524-46-2
Amsilarotene	125973-56-0
Anacetrapib	875446-37-0
Anamorelin	249921-19-5
Anrukinzumab	910649-32-0
Apadenoson	250386-15-3
Apilimod	541550-19-0
Aplaviroc	461443-59-4
Apremilast	608141-41-9
Apricitabine	160707-69-7
Apricoxib	197904-84-0
Arbaclofen Placarbil	847353-30-4
Arterolane	664338-39-0
Atacicept	845264-92-8
Axitinib	319460-85-0
Azilsartan	147403-03-0
Azilsartan Medoxomil	863031-21-4
Azoximer Bromide	892497-01-7

Bafetinib	859212-16-1
Balamapimod	863029-99-6
Baminercept	909110-25-4
Bavituximab	648904-28-3
Bederocin	757942-43-1
Bedoradrine	194785-19-8
Befiradol	208110-64-9
Begacestat	769169-27-9
Belinostat	414864-00-9
Bentamapimod	848344-36-5
Bepermingene Perplasmid	627861-07-8
Beroctocog Alfa	9001-27-8
Berubicin	677017-23-1
Besifloxacin	141388-76-3
Betrixaban	330942-05-7
Bevasiranib	959961-96-7
Bevirimat	174022-42-5
Boceprevir	394730-60-0
Bosutinib	380843-75-4
Brecanavir	313682-08-5
Bremelanotide	189691-06-3
Briobacept	869881-54-9
Brivanib Alaninate	649735-63-7
Bucelipase Alfa	9026-00-0
Cabazitaxel	183133-96-2
Camobucol	216167-92-9
Canakinumab (light chain)	402710-27-4
Canakinumab (heavy chain)	402710-25-2
Capadenoson	544417-40-5
Capeserod	769901-96-4
Carfilzomib	868540-17-4
Cariprazine	839712-12-8
Carisbamate	194085-75-1
Carmegliptin	813452-18-5
Casopitant	414910-27-3
Catramilast	183659-72-5
Catridecacog	606138-08-3
Cediranib	288383-20-0
Ceftaroline Fosamil	229016-73-3
Celivarone	401925-43-7
Cenersen	872847-66-0
Cevipabulin	849550-05-6

Cevoglitazar	839673-52-8
Choline Fenofibrate	856676-23-8
Cinaciguat	329773-35-5
Citatuzumab Bogatox	945228-49-9
Cobiprostone	333963-42-1
Conatumumab	896731-82-1
Conestat Alfa	80295-38-1
Contusugene Ladenovec	600735-73-7
Custirsen	903916-27-8
Dacetuzumab	880486-59-9
Dalcetrapib	211513-37-0
Danusertib	827318-97-8
Dapagliflozin	461432-26-8
Daporinad	201034-75-5
Darapladib	356057-34-6
Darinaparsin	69819-86-9
Darotropium Bromide	850607-58-8
Dasatinib	302962-49-8
Delimotecan	187852-63-7
Demiditraz	944263-65-4
Denagliptin	483369-58-0
Denicocin	716840-32-3
Denibulin	284019-34-7
Denosumab	615258-40-7
Derquantel	187865-22-1
Dexamethasone Cipeclate	132245-57-9
Dexelvucitabine	134379-77-4
Dexnebivolol	118457-15-1
Diaplasinin	481631-45-2
Dilopetine	247046-52-2
Disitertide	272105-42-7
Disomotide	181477-43-0
Dovitinib	405169-16-6
Drinabant	358970-97-5
Dulanermin	867153-61-5
Dutacatib	501000-36-8
Edoxaban	480449-70-5
Efungumab	762260-74-2
Elacytarabine	188181-42-2
Elagolix	834153-87-6
Eldecalcitol	104121-92-8
Elesclomol	488832-69-5

Elocalcitol	199798-84-0
Elsibucol	216167-95-2
Eltrombopag	496775-61-2
Elvitegravir	697761-98-1
Emricasan	254750-02-2
Entinostat	209783-80-2
Epetirimod	227318-71-0
Epoetin Kappa	879555-13-2
Epoetin Theta	762263-14-9
Eprodisate	21668-77-9
Eprotrirome	355129-15-6
Eribaxaban	536748-46-6
Eribulin	253128-41-5
Esreboxetine	98819-76-2
Etaracizumab	892553-42-3
Ezatiostat	168682-53-9
Fasobegron	643094-49-9
Favipiravir	259793-96-9
Faxeladol	433265-65-7
Fermagate	119175-48-3
Ferric Carboxymaltose	9007-72-1
Ferroquine	185055-67-8
Fimasartan	247257-48-3
Firategrast	402567-16-2
Flopristin	318498-76-9
Flovagatran	871576-03-3
Fluticasone Furoate	397864-44-7
Folitixorin	3432-99-3
Foravirumab	944548-38-3
Fosalvudine Tidoxil	763903-67-9
Fosaprepitant	172673-20-0
Fospropofol	258516-89-1
Gabapentin Enacarbil	478296-72-9
Gamithromycin	145435-72-9
Gantenerumab	89957-37-9
Giripladib	865200-20-0
Golotimod	229305-39-9
Goxalapladi	412950-27-7
Ibalizumab	680188-33-4
Ibipinabant	464213-10-3
Ibodutant	522664-63-7
Idrabioparinix Sodium	405159-59-3

Ilepatril	473289-62-2
Imeglimin	775351-65-0
Imepitoin	188116-07-6
Imisopasem Manganese	218791-21-0
Inakalant	335619-18-6
Incyclinide	15866-90-7
Indantadol	202844-10-8
Inolitazone	223132-37-4
Intiquinate	445041-75-8
Iodofiltic Acid (123I)	123748-56-1
Ipilimumab	477202-00-9
Iratumumab	640735-09-7
Isavuconazole	241479-67-4
Isavuconazonium Chloride	338990-84-4
Lancovutide	1391-36-2
Lapaquistat	189059-71-0
Larazotide	258818-34-7
Laromustine	173424-77-6
Laropiprant	571170-77-9
Larotaxel	156294-36-9
Lensiprazine	327026-93-7
Levamlodipine	103129-82-4
Levomefolic Acid	31690-09-2
Levomilnacipran	96847-55-1
Levonadifloxacin	154357-42-3
Levonebivolol	118457-16-2
Lexatumumab	845816-02-6
Lifciguat	170632-47-0
Linaclotide	851199-59-2
Linagliptin	668270-12-0
Linopristin	325965-23-9
Lisdexamfetamine	608137-32-2
Litenimod	852313-25-8
Lixisenatide	320367-13-3
Lobeglitazone	607723-33-1
Lodenafil Carbonate	398507-55-6
Lonaprisan	211254-73-8
Lorcaserin	616202-92-7
Lucatumumab	903512-50-5
Macitentan	441798-33-0
Managlinat Dialanetil	280782-97-0
Masilukast	136564-68-6

Masitinib	790299-79-5
Mavacoxib	170569-88-7
Melogliptin	868771-57-7
Metenkefalin	58569-55-4
Methylnaltrexone Bromide	73232-52-7
Mifamurtide	83461-56-7
Migalastat	108147-54-2
Milatuzumab	899796-83-9
Milveterol	652990-07-3
Mimopezil	180694-97-7
Mipomersen	1000120-98-8
Mirabegron	223673-61-8
Mirodenafil	862189-95-5
Monepantel	887148-69-8
Motavizumab	677010-34-3
Motesanib	453562-69-1
Naproxcinod	163133-43-5
Naptumomab Estafenatox	676258-98-3
Nelivaptan	439687-69-1
Nemonoxacin	378746-64-6
Nepidermin	62253-63-8
Neratinib	698387-09-6
Nesbuvir	691852-58-1
Nilotinib	641571-10-0
Nimotuzumab	828933-51-3
Niraxostat	206884-98-2
Obatoclax	803712-67-6
Obinopitide	348119-84-6
Obinutuzumab	949142-50-1
Ocrelizumab	637334-45-3
Odanacatib	603139-19-1
Oglemilast	778576-62-8
Olaparib	763113-22-0
Olesoxime	22033-87-0
Omacetaxine Mepesuccinate	26833-87-4
Ombrabulin	181816-48-8
Omtriptolide	195883-06-8
Orvepitant	579475-18-6
Otelixizumab	881191-44-2
Otenabant	686344-29-6
Ovemetide	181477-91-8
Ozarelix	295350-45-7

Ozenoxacin	245765-41-7
Padeliporfin	759457-82-4
Pafuramidine	186953-56-0
Palifosfamide	31645-39-3
Palovarotene	410528-02-8
Pamapimod	449811-01-2
Panobinostat	404950-80-7
Paquinimod	248282-01-1
Pardoprunox	269718-84-5
Parogrelil	139145-27-0
Pazopanib	444731-52-6
Pegloticase	885051-90-1
Perampanel	380917-97-5
Peretinoin	81485-25-8
Pexacerfont	459856-18-9
Pimavanserin	706779-91-1
Piragliatin	625114-41-2
Pitolisant	362665-56-3
Pomalidomide	19171-19-8
Posaraprost	172740-14-6
Pramiconazole	219923-85-0
Preladenant	377727-87-2
Prinaberel	524684-52-4
Pyronaridine	74847-35-1
Quarfloxin	865311-47-3
Rabeximod	872178-65-9
Radezolid	869884-78-6
Radiprodil	496054-87-6
Rafivirumab	944548-37-2
Raltegravir	518048-05-0
Regrelor	787548-03-2
Relacatib	362505-84-8
Remogliflozin Etabonate	442201-24-3
Resatorvid	243984-11-4
Retaspimycin	857402-23-4
Retosiban	820957-38-8
Ridaforolimus	572924-54-0
Rilapladib	412950-08-4
Rilonacept	501081-76-1
Riociguat	625115-55-1
Rolapitant	552292-08-7
Rolipoltide	698389-00-3

Rolofylline	136199-02-5
Romidepsin	128517-07-7
Romiplostim	267639-76-9
Ronacaleret	753449-67-1
Ropidoxuridine	093265-81-7
Rosabulin	501948-05-6
Rosonabant	861151-12-4
Rotigaptide	355151-12-1
Rusalatide	497221-38-2
Sagopilone	305841-29-6
Salirasib	162520-00-5
Sapacitabine	151823-14-2
Saracatinib	379231-04-6
Semagacestat	425386-60-3
Semuloparin Sodium	9041-08-1
Senicapoc	289656-45-7
Sergliflozin Etabonate	408504-26-7
Simotaxel	791635-59-1
Sitagliptin	486460-32-6
Sitimagine Ceradenovec	898830-54-1
Sivifene	2675-35-6
Sodelglitazar	447406-78-2
Sofigatran	187602-11-5
Sontuzumab	372075-37-1
Sotirimod	227318-75-4
Sotrastaurin	425637-18-9
Stamulumab	705287-60-1
Succinobucol	216167-82-7
Tadocizumab	339086-80-5
Talarozole	870093-23-5
Talmapimod	309913-83-5
Talotrexin	113857-87-7
Tanespimycin	75747-14-7
Tanezumab	880266-57-9
Taranabant	701977-09-5
Tarenflurbil	051543-40-9
Taribavirin	119567-79-2
Tasimelteon	609799-22-6
Tasisulam	519055-62-0
Taspoglutide	275371-94-3
Tecovirimat	816458-31-8
Telaprevir	402957-28-2

Telatinib	332012-40-5
Tenatumomab (light chain)	592557-43-2
Tenatumomab (heavy chain)	592557-41-0
Teneligliptin	760937-92-6
Teplizumab	876387-05-2
Terameprocol	24150-24-1
Tertomotide	915019-08-8
Tesamorelin	218949-48-5
Tezampanel	154652-83-2
Thrombin Alfa	869858-13-9
Ticagrelor	274693-27-5
Tigapotide	848084-83-3
Tigatuzumab	918127-53-4
Tildipirosin	328898-40-4
Tipelukast	125961-82-2
Tiplasinin	393105-53-8
Tomopenem	222400-20-6
Tosedostat	238750-77-1
Totrombopag	376592-42-6
Trabedersen	925681-61-4
Tramiprosate	3687-18-1
Transferrin Aldifitox	721946-42-5
Trelanserin	189003-92-7
Tremelimumab	745013-59-6
Tridecactide	22006-64-0
Tropantiool	189950-11-6
Troplasminogen Alfa	931101-84-7
Tucotuzumab Celmoleukin	339986-90-2
Tylvalosin	63409-12-1
Ustekinumab	815610-63-0
Vabicaserin	620948-93-8
Vadimezan	117570-53-3
Vapitadine	793655-64-8
Vatreptacog Alfa (Activated)	897936-89-9
Velafermin	697766-75-9
Velaglucerase Alfa	884604-91-5
Veliflapon	128253-31-6
Velimogene Aliplasmid	296251-72-4
Velneperit	342577-38-2
Veltuzumab	728917-18-8
Vernakalant	794466-70-9
Verpasep Caltспен	295371-00-5

Vicriviroc	306296-47-9
Viquidacin	904302-98-3
Voclosporin	515814-01-4
Volinaserin	139290-65-6
Vorinostat	149647-78-9
Votucalis	872525-61-6
Zibotentan	186497-07-4
Zotarolimus	221877-54-9

Table 2
Prefixes and suffixes proposed for addition to the Pharmaceutical Appendix to the Harmonized Tariff Schedule

Item
alanetil
alaninate
alapivoxil
ceribate
cipecilate
dalanated
enacarbil
etexilate
fosamil
glucuronide
medocaril
placarbil
aldifitox
aritox
besudotox
estafenatox
paptox

Table 3
Pharmaceutical intermediates proposed for addition to the Pharmaceutical Appendix to the Harmonized Tariff Schedule of the United States

Product Name	CAS Number
(2R)-phenyl[(2R)-piperidin-2-yl]ethanoic acid hydrochloride	741705-70-4
methyl (1S,2S,3S,4R)-3-[(1S)-1-amino-2-ethylbutyl]-4-[(tert-butoxycarbonyl)amino]-2-hydroxycyclopentanecarboxylate	316173-29-2
disodium 5,5'-[(2-hydroxypropane-1,3-diyl)bis(oxy)]bis(4-oxo-4H-chromene-2-carboxylate)	15826-37-6
N,N',N''-(boroxin-2,4,6-triyltris{[(1S)-3-methylbutane-1,1-diyl]imino[(2S)-1-oxo-3-phenylpropane-1,2-diyl]})tripyrazine-2-carboxamide	390800-88-1
1-(2-ethylbutyl)cyclohexanecarbonyl chloride	211515-46-7
1-(2-ethylbutyl)-N-(2-sulfanylphenyl)cyclohexanecarboxamide	211513-21-2
ethyl 2-amino-9,10-dimethoxy-1,6,7,11b-tetrahydro-4H-pyrido[2,1-a]isoquinoline-3-carboxylate	1012065-72-3
3-(1,1-dimethylethyl)-N-[(9H-fluoren-9-ylmethoxy)carbonyl]-1-(triphenylmethyl)-L-histidyl-2-methylalanyl-L- α -glutamylglycine	1000164-35-1
N-(4-tert-butylbenzyl)-2-(4-chloro-3-ethylphenyl)ethanamine	945717-43-1
2-(4-chloro-3-ethylphenyl)ethanamine hydrochloride	945717-05-5
ethyl (3aR,7R,7aR)-2,2-dimethyl-7-[(methylsulfonyl)oxy]-3a,6,7,7a-tetrahydro-1,3-benzodioxole-5-carboxylate	204254-84-2
(2R,3R,4R,5R)-2-(4-amino-5-fluoro-2-oxopyrimidin-1(2H)-yl)-2-fluoro-5-methyltetrahydrofuran-3,4-diyl diacetate	161599-46-8
(2R,3S,4R)-5-(4-amino-2-oxopyrimidin-1(2H)-yl)-2-azido-2-[(2-methylpropanoyl)oxy]methyl}tetrahydrofuran-3,4-diyl bis(2-methylpropanoate) hydrochloride	690270-65-6
{(2R,3S,4R,5R)-2-azido-5-(2,4-dioxo-3,4-dihydropyrimidin-1(2H)-yl)-3,4-bis[(phenylcarbonyl)oxy]tetrahydrofuran-2-yl}methyl 3-chlorobenzoate	812647-80-6
1-(2-ethylbutyl)cyclohexanecarboxylic acid	381209-09-2
1-(2-ethylbutyl)cyclohexanecarbonitrile	855425-38-6
(4S)-1-[(2S,3S,11bS)-2-amino-9,10-dimethoxy-1,3,4,6,7,11b-hexahydro-2H-pyrido[2,1-a]isoquinolin-3-yl]-4-(fluoromethyl)pyrrolidin-2-one dihydrochloride	813452-14-1
(4S)-4-(fluoromethyl)dihydrofuran-2(3H)-one	916069-80-2
2-[4-(aminomethyl)phenoxy]-N,N-dimethylethanamine	20059-73-8
trans-4-(propan-2-yl)cyclohexanecarboxylic acid	7077-05-6
(3 β)-3-hydroxycholest-5-en-24-one	17752-16-8
3-ethyl-5-methyl-4-(2-chlorophenyl)-2-[[2-(1,3-dioxo-1,3-dihydro-2H-isoindol-2-yl)ethoxy]methyl]-6-methyl-1,4-dihydropyridine-3,5-dicarboxylate	88150-62-3
(1S)-1,5:7,10-dianhydro-12,13-bis-O-[tert-butyl(dimethyl)silyl]-2,3,4,6,8,11-hexadeoxy-1-{2-[(2S,5S)-5-(3-hydroxypropyl)-3-methylidenetetrahydrofuran-2-yl]ethyl}-3-methyl-9-O-methyl-4-methylidene-8-[(phenylsulfonyl)methyl]-D-arabino-D-altro-tridecitol	253128-10-8
(2R,4R)-4-[[tert-butyl(dimethyl)silyl]oxy]-N-methoxy-N,2-dimethyloct-7-enamide	914922-88-6

(4R)-2-bromo-7-[[tert-butyl(diphenyl)silyl]oxy]hept-1-en-4-yl 4-methylbenzenesulfonate	871355-80-5
(2R,4R)-4-[[[(1,1-dimethylethyl)dimethylsilyl]oxy]-N-methoxy-N,2-dimethyl-7-oxoheptanamide	914922-89-7
(2-bromoethenyl)(trimethyl)silane	13682-94-5
methyl 3-(trimethylsilyl)pent-4-enoate	185411-12-5
1-[[[(2R,3S)-2-(2,4-difluorophenyl)-3-methyloxiran-2-yl]methyl]-1H-1,2,4-triazole	127000-90-2
4-(bromoacetyl)benzotrile	20099-89-2
(3R)-3-methoxydecan-1-ol	185954-75-0
2-(1,3,2-dioxaborinan-2-yl)benzotrile	172732-52-4
4,5-diethoxy-3-fluorobenzene-1,2-dicarbonitrile	474554-45-5
2-bromo-1-[3-tert-butyl-4-methoxy-5-(morpholin-4-yl)phenyl]ethanone	474554-48-8
L-lysine -- [[[(2R,3R)-3-[4-(4-cyanophenyl)-1,3-thiazol-2-yl]-2-(2,4-difluorophenyl)-1-(1H-1,2,4-triazol-1-yl)butan-2-yl]oxy]methyl dihydrogen phosphate -- ethanol (1:1:1)	914361-45-8
4-{3-chloro-4-[(cyclopropylcarbamoyl)amino]phenoxy}-7-methoxyquinoline-6-carboxamide methanesulfonate	417716-92-8
2-[[[4-[(2,2-dimethyl-1,3-dioxan-5-yl)methoxy]-3,5-dimethylpyridin-2-yl]methyl]sulfinyl]-1Hbenzimidazole, sodium salt (1:1)	913695-00-8
(1R)-1,2-anhydro-4-C-[(1E,3E)-4-[(1S,2S,3E,5R,6R,9R)-5-(1-carboxylato-4-cycloheptylpiperazin-2-yl)-6,9-dihydroxy-2,6-dimethyl-11-oxooxacyclododec-3-en-1-yl]penta-1,3-dien-1-yl]-3,5-dideoxy-1-[(2R,3S)-3-hydroxypentan-2-yl]-D-erythropentitol	630100-90-2
[6(2Z,3R)]-3-O-decyl-2-deoxy-6-O-[2-deoxy-3-O-(3-methoxydecyl)-6-methyl-2-[(1-oxo-11-octadecenyl)amino]-4-O-phosphono-β-D-glucopyranosyl]-2-[(1,3-dioxotetradecyl)amino]-α-D-glucopyranose 1-(dihydrogen phosphate) tetrasodium salt	185954-98-7
2-[2-(2,2,2-trifluoroethoxy)phenoxy]ethyl methanesulfonate	160969-03-9
3-{5-[(2R)-2-aminopropyl]-7-cyano-2,3-dihydro-1H-indol-1-yl}propyl benzoate (2R,3R)-2,3-dihydroxybutanedioate	239463-85-5
4,6,7,8-tetrahydroquinoline-2,5(1H,3H)-dione	5057-12-5
5-(4-chlorobutyl)-1-cyclohexyl-1H-tetrazole	73963-42-5
6-hydroxy-3,4-dihydroquinolin-2(1H)-one	54197-66-9
8,9-difluoro-5-methyl-1-oxo-6,7-dihydro-1H,5H-pyrido[3,2,1-ij]quinoline-2-carboxylic acid	80076-47-7
7-hydroxy-3,4-dihydroquinolin-2(1H)-one	22246-18-0
4-chlorobutyl 2-nitrobenzenesulfonate	441002-17-1
3-(2-oxo-1,2-dihydroquinolin-4-yl)alanine	5162-90-3
4-(bromomethyl)quinolin-2(1H)-one	4876-10-2
1-[(4-methylphenyl)sulfonyl]-1,2,3,4-tetrahydro-5H-1-benzazepin-5-one	24310-36-9

4-[(2-methylphenyl)carbonylamino]benzoic acid	108166-22-9
2-methyl-4-[(2-methylphenyl)carbonylamino]benzoic acid	317374-08-6
7-chloro-1-[(4-methylphenyl)sulfonyl]-1,2,3,4-tetrahydro-5H-1-benzazepin-5-one	193686-76-9
6-(chloroacetyl)pyridine-2-carboxylic acid	298692-34-9
3,4-diethoxybenzenecarbothioamide	60759-00-4
4-[4-[4-(trifluoromethoxy)phenoxy]piperidin-1-yl]phenol 4-methylbenzenesulfonate	866109-93-5
[(2R)-2-methyloxiran-2-yl]methyl 4-nitrobenzenesulfonate	683276-64-4
2-bromo-4-nitro-1H-imidazole	65902-59-2
2-chloro-4-nitro-1H-imidazole	57531-37-0
4-nitrobenzyl(6R,7R)-7-amino-8-oxo-3-[(2S)-tetrahydrofuran-2-yl]-5-thia-1-azabicyclo[4.2.0]oct-2-ene-2-carboxylate hydrochloride	655233-39-3
[4-amino-N-(pyrimidin-2(1H)-ylidene-kN1)benzenesulfonamidato-kO]silver	22199-08-2
2-[2-(3-methoxyphenyl)ethyl]phenol	167145-13-3
N-[[4-(4-fluorobenzyl)morpholin-2-yl]methyl]acetamide	112913-94-7
{2-[(4-chlorophenyl)sulfanyl]phenyl}acetic acid	13459-62-6
N-cyclohexyl-5-hydroxypentanamide	84996-93-0
4-chloro-2-[(2-methoxy-2-oxoethoxy)imino]-3-oxobutanoic acid	95759-10-7
tert-butyl-2-[(2-methoxy-2-oxoethoxy)imino]-3-oxobutanoate	268544-50-9
tert-butyl (2Z)-2-[(2-methoxy-2-oxoethoxy)imino]-3-oxobutanoate	84080-68-2
sodium (2Z)-(2-amino-1,3-thiazol-4-yl)(hydroxyimino)ethanoate	127660-04-2
diphenylmethyl(2R)-3-methyl-2-[(1R,5S)-3-(4-methylphenyl)-7-oxo-4-oxa-2,6-diazabicyclo[3.2.0]hept-2-en-6-yl]but-3-enoate	67978-05-6
4-(hydroxymethyl)-5-methyl-1,3-dioxol-2-one	91526-18-0
2-[(8S)-1,6,7,8-tetrahydro-2H-indeno[5,4-b]furan-8-yl]ethanamine hydrochloride	196597-80-5
(2E)-1,2,6,7-tetrahydro-8H-indeno[5,4-b]furan-8-ylideneethanenitrile	196597-79-2
methyl 1-[(2'-cyanobiphenyl-4-yl)methyl]-2-ethoxy-1H-benzimidazole-7-carboxylate	139481-44-0
methyl 2-[[2'-cyanobiphenyl-4-yl)methyl]amino]-3-nitrobenzoate	139481-28-0
2-[(6-chloro-3-methyl-2,4-dioxo-3,4-dihydropyrimidin-1(2H)-yl)methyl]benzotrile	865758-96-9
(3R)-piperidin-3-amine dihydrochloride	334618-23-4
iodomethyl pivalate	53064-79-2

ethyl 7-(3-aminopyrrolidin-1-yl)-1-(2,4-difluorophenyl)-6-fluoro-4-oxo-1,4-dihydro-1,8-naphthyridine-3-carboxylate	105152-95-2
4-(1-carbamoylcyclopropyl)-2,3,5-trifluorobenzoic acid	143785-84-6
(3S)-10-[1-(acetylamino)cyclopropyl]-9-fluoro-3-methyl-7-oxo-2,3-dihydro-7H-[1,4]oxazino[2,3,4-ij]quinoline-6-carboxylic acid	163680-80-6
(6R,7R)-7-({N-[(4-ethyl-2,3-dioxopiperazin-1-yl)carbonyl]-D-threonyl}amino)-3-[[1-(1-methyl-1H-tetrazol-5-yl)sulfanyl]methyl]-8-oxo-5-thia-1-azabicyclo[4.2.0]oct-2-ene-2-carboxylic acid	76610-92-9
N-(5-methoxy-2-phenoxyphenyl)methanesulfonamide	123664-84-6
N-[4-(N-formylglycyl)-5-methoxy-2-phenoxyphenyl]methanesulfonamide	149456-98-4
N-[4-(N-formylglycyl)-5-hydroxy-2-phenoxyphenyl]methanesulfonamide	149457-03-4
5-bromo-1-benzothiophene	4923-87-9
(1-benzothiophen-5-yl)acetic acid	17381-54-3
2-(1-benzothiophen-5-yl)ethanol	96803-30-4
3-[2-(1-benzothiophen-5-yl)ethoxy]propionic acid	519188-42-2
3-[2-(1-benzothiophen-5-yl)ethoxy]-1-(3-hydroxyazetidin-1-yl)propan-1-one	519188-55-7
1-[3-(2-benzob[thien-5-yl]ethoxy)propyl]-3-azetidinol -- (2Z)-2-butenedioate (1:1)	519187-97-4
2-oxo-2H-chromene-6-carboxylic acid	7734-80-7
6-[(2,4-dimethoxyphenyl)carbonyl]-2H-chromen-2-one	947408-90-4
6-[(2,4-dihydroxyphenyl)carbonyl]-2H-chromen-2-one	947408-91-5
methyl 3-(5-[[4-(cyclopentyloxy)-2-hydroxyphenyl]carbonyl]-2-hydroxyphenyl)propanoate	530141-60-7
N,2-dihydroxy-4-methylbenzamide	158671-29-5
6-methyl-2-trityl-1,2-benzoxazol-3(2H)-one	947408-94-8
6-(bromomethyl)-2-triphenylmethyl-1,2-benzisoxazol-3(2H)-one	947408-95-9
methyl 3-[5-[4-(cyclopentyloxy)-2-hydroxybenzoyl]-2-[(2-triphenylmethyl-1,2-benzisoxazol-3(2H)-on-6-yl)methoxy]phenyl]propionate	947409-01-0
3-(5-[[4-(cyclopentyloxy)-2-hydroxyphenyl]carbonyl]-2-[(3-hydroxy-1,2-benzoxazol-6-yl)methoxy]phenyl)propanoic acid	530141-72-1
2-aminomalonamide	62009-47-6
3-oxo-3,4-dihydropyrazine-2-carboxamide	55321-99-8
6-bromo-3-oxo-3,4-dihydropyrazine-2-carboxamide	259793-88-9
3-oxo-4-(2,3,5-tri-O-acetyl-β-D-ribofuranosyl)-3,4-dihydropyrazine-2-carboxamide	499785-81-8
3-oxo-4-(β-D-ribofuranosyl)-3,4-dihydropyrazine-2-carboxamide	356782-84-8

3,3'-piperidine-1,4-diyl dipropan-1-ol 4-methylbenzenesulfonate	936637-40-0
4,4'-[piperidine-1,4-diylbis(propane-3,1-diyl oxy)]dibenzonitrile	873546-80-6
4,4'-[piperidine-1,4-diylbis(propane-3,1-diyl oxy)]bis(N'-hydroxybenzenecarboximidamide)	873546-30-6
4,4'-[piperidine-1,4-diylbis(propane-3,1-diyl oxy)]bis[N'-(acetyloxy)benzenecarboximidamide]	873546-74-8
4,4'-[piperidine-1,4-diylbis(propane-3,1-diyl oxy)]dibenzene carboximidamide trihydrochloride pentahydrate	873546-38-4
benzyl 2-(4-fluoro-2-methylphenyl)-4-oxo-3,4-dihydropyridine-1(2H)-carboxylate	414909-98-1
(1R)-1-[3,5-bis(trifluoromethyl)phenyl]-N-methylethanamine	334477-60-0
(2S)-hydroxy(phenyl)ethanoic acid -- (2R)-2-(4-fluoro-2-methylphenyl)piperidin-4-one (1:1)	414910-13-7
ethyl [(3-endo)-8-methyl-8-azabicyclo[3.2.1]oct-3-yl]acetate	56880-11-6
(1R)-2-(benzylamino)-1-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)ethanol	452342-08-4
(5R)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	452339-73-0
2-[(2,6-dichlorobenzyl)oxy]ethanol	85309-91-7
2-({2-[(6-bromohexyl)oxy]ethoxy)methyl}-1,3-dichlorobenzene	503070-57-3
(5R)-3-(6-{2-[(2,6-dichlorobenzyl)oxy]ethoxy}hexyl)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	503068-36-8
triphenylacetic acid -- 4-((1R)-2-[(6-{2-[(2,6-dichlorobenzyl)oxy]ethoxy}hexyl)amino]-1-hydroxyethyl)-2-(hydroxymethyl)phenol (1:1)	503070-58-4
5-[4-[[3-chloro-4-[(3-fluorophenyl)methoxy]phenyl]amino]-6-quinazoliny]-2-furancarboxaldehyde 4-methylbenzenesulfonate (1:1)	388082-75-5
1,2,3,4,6-penta-O-acetyl-β-D-glucopyranose	604-69-3
methyl 3'-aminobiphenyl-3-carboxylate	168619-25-8
N-(2-chloroethyl)acetamide	7355-58-0
methyl 3'-(2-methyl-4,5-dihydro-1H-imidazol-1-yl)biphenyl-3-carboxylate	451470-33-0
(2R)-2-(3-chlorophenyl)oxirane	62600-71-9
N-methylbenzenecarbothiohydrazide	21048-05-5
1-[(methylsulfonyl)carbonyl]oxyethyl 2-methylpropanoate	860035-07-0
1-[(2,5-dioxopyrrolidin-1-yl)oxy]carbonyl]oxyethyl 2-methylpropanoate	860035-10-5
[(3S,4R)-4-(4-fluorophenyl)-1-methylpiperidin-3-yl]methanol	105812-81-5
(2R)-2-[(5-bromo-2,3-difluorophenoxy)methyl]oxirane	702687-42-1
ethyl 3-(3-[(2R)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy)-4,5-difluorophenyl)propanoate hydrochloride	702686-97-3
(4S)-4-ethyl-4-hydroxy-1H-pyrano[3',4':6,7]indolizino[1,2-b]quinoline-3,14(4H,12H)-dione	7689-03-4

9H-carbazol-4-ol	52602-39-8
2-[(4-fluorobenzyl)sulfanyl]-1,5,6,7-tetrahydro-4H-cyclopenta[d]pyrimidin-4-one	451487-18-6
{2-[(4-fluorobenzyl)sulfanyl]-4-oxo-4,5,6,7-tetrahydro-1H-cyclopenta[d]pyrimidin-1-yl}acetic acid	356058-42-9
4'-(trifluoromethyl)biphenyl-4-carbaldehyde	90035-34-0
(5-chloro-2-methoxyphenyl)boronic acid	89694-48-4
5'-chloro-2'-hydroxy-3'-nitrobiphenyl-3-carboxylic acid	376592-58-4
2-(3,4-dimethylphenyl)-5-methyl-2,4-dihydro-3H-pyrazol-3-one	18048-64-1
2,3-dimethyl-2H-indazol-6-amine	444731-72-0
2,4-dichloropyrimidine	3934-20-1
N-(2-chloropyrimidin-4-yl)-2,3-dimethyl-2H-indazol-6-amine	444731-74-2
5-amino-2-methylbenzenesulfonamide	6973-09-7
2-[methyl(pyridin-2-yl)amino]ethanol	122321-04-4
(5Z)-5-(4-fluorobenzylidene)-1,3-thiazolidine-2,4-dione	291536-35-1
1,6-di-O-acetyl-2-azido-3,4-di-O-benzyl-2-deoxy-D-glucopyranose	136172-58-2
methyl 6-O-acetyl-4-O-(2-O-acetyl-3-O-benzyl-6-methyl- α -L-idopyranuronosyl)-3-O-benzyl-2- {[(benzyloxy)carbonyl]amino}-2-deoxy- α -D-glucopyranoside	114869-97-5
methyl (2S,3S,4S,5S,6S)-6-[[[(1S,2S,3S,4R,5R)-3-(acetyloxy)-4-azido-6,8- dioxabicyclo[3.2.1]oct-2-yl]methyl]-4,5-bis(benzyloxy)-3-hydroxytetrahydro-2H-pyran-2- carboxylate	99541-26-1
(1R,2S,3R,4R,5R)-4-azido-2-[[[(4aR,6S,7R,8S,8aR)-7,8-bis(benzyloxy)-2- phenylhexahydropyrano[3,2-d][1,3]dioxin-6-yl]oxy]-6,8-dioxabicyclo[3.2.1]oct-3-yl acetate	99541-23-8
4-[3-hydroxy-3-phenyl-3-(thiophen-2-yl)propyl]-4-methylmorpholin-4-ium methyl sulfate	6504-57-0
methyl 3-amino-4-methylthiophene-2-carboxylate	85006-31-1
4-cyclopentylpiperazin-1-amine	61379-64-4
4-methylpiperazine-1-carbonyl chloride hydrochloride	55112-42-0
5-chloropyridin-2-amine	1072-98-6
2-chlorobenzylamine	89-97-4
benzyl (2S,3aR,7aS)-octahydro-1H-indole-2-carboxylate hydrochloride	145641-35-6
6-chlorohexan-2-one	10226-30-9
ethyl 3-[(5-chloro-2-nitrophenyl)(phenyl)amino]-3-oxopropanoate	22316-45-6
colchicoside	477-29-2
(3 β ,16 α)-3-hydroxy-16,17-epoxypregn-5-en-20-one	974-23-2

antimonic acid -- 1-deoxy-1-(methylamino)-D-glucitol (1:1)	133-51-7
sodium hydrogen 3-sulfonatobenzoate	17625-03-5
ethyl 2-[4-(2,2-dichlorocyclopropyl)phenoxy]-2-methylpropanoate	52179-28-9
sodium 2-propylpentanoate	1069-66-5
propyl {4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxyphenyl}acetate	579494-66-9
5-[(4-bromo-2-chlorophenyl)amino]-4-fluoro-N-(2-hydroxyethoxy)-1-methyl-1H-benzimidazole-6-carboxamide	606143-52-6
4-hydroxybenzoic acid -- (2S,4E)-N-methyl-5-[5-(propan-2-yloxy)pyridin-3-yl]pent-4-en-2-amine (1:1)	691882-47-0
N-(2-[(2S)-3-[[1-(4-chlorobenzyl)piperidin-4-yl]amino]-2-hydroxy-2-methylpropyl]oxy)-4-hydroxyphenyl)acetamide	548797-97-3
4-amino-8-(2,5-dimethoxyphenyl)-N-propylcinnoline-3-carboxamide	942436-93-3
4-amino-8-(2-fluoro-6-methoxyphenyl)-N-propylcinnoline-3-carboxamide	942437-37-8
(2S)-1-(tert-butoxycarbonyl)azetidione-2-carboxylic acid	51077-14-6
(2S)-N-{4-[(Z)-amino(methoxyimino)methyl]benzyl}-1-[(2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyethanoyl]azetidione-2-carboxamide benzenesulphonic acid (1:1)	631916-97-7
2-{ethyl[3-({4-[(5-{2-[(3-fluorophenyl)amino]-2-oxoethyl)-1H-pyrazol-3-yl]amino]quinazolin-7-yl}oxy)propyl]amino}ethyl dihydrogen phosphate	722543-31-9
N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methyl-1-piperazinyl)ethoxy]-5-[(tetrahydro-2H-pyran-4-yl)oxy]-4-quinazolinamine -- (2E)-2-butenedioate (1:2)	893428-72-3
3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]quinoline-4-carboxamide	941690-55-7
(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine] (S,S)-2,3-dihydroxybutanedioate	220100-81-2
(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine]	220099-91-2
4-fluoro-2-methyl-1H-indol-5-ol	288385-88-6
2-[(3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylsulfanyl)pyrimidin-4-yl]amino]-2,2-dimethyltetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-yl]oxy}ethanol	376608-74-1
(1R,2S)-2-(3,4-difluorophenyl)cyclopropanaminium (2R)-hydroxy(phenyl)ethanoate	376608-71-8
7-(benzyloxy)-6-methoxyquinazolin-4(3H)-one	179688-01-8
sodium hydrogen [1-hydroxy-1-phosphono-2-(pyridin-3-yl)ethyl]phosphonate hemipentahydrate	329003-65-8
(5S,8S,11S,14S,17S,20S,23S,26S,29S,32S,35S,38S)-5-(3-amino-3-oxopropyl)-20-benzyl-23-[(2S)-butan-2-yl]-14,38-bis{4-[(tert-butoxycarbonyl)amino]butyl}-29-[[1-(tert-butoxycarbonyl)-1H-indol-3-yl]methyl]-17-(3-tert-butoxy-3-oxopropyl)-1-(1H-fluoren-9-yl)-8,11,26,41,41-pentamethyl-32-(2-methylpropyl)-3,6,9,12,15,18,21,24,27,30,33,36,39-tridecaoxo-35-(propan-2-yl)-2-oxa-4,7,10,13,16,19,22,25,28,31,34,37,40-tridecaazadotetracontan-42-oic acid	1000164-36-2
5-methyl-1-(propan-2-yl)-4-[4-(propan-2-yloxy)benzyl]-1,2-dihydro-3H-pyrazol-3-one	1028026-83-6
2-methyl-3-[(2S)-pyrrolidin-2-ylmethoxy]pyridine 2,3-dihydroxybutanedioate	945405-37-8

(2S,3S)-2,3-bis[(phenylcarbonyl)oxy]butanedioic acid -- ethyl (3aR,6aR)-hexahydropyrrolo[3,4-b]pyrrole-5(1H)-carboxylate (1:1)	948846-40-0
(3aR,6aR)-1-(pyridin-3-yl)octahydropyrrolo[3,4-b]pyrrole 4-methylbenzenesulfonate	00-00-0
(3aR,6aR)-1-(pyridin-3-yl)octahydropyrrolo[3,4-b]pyrrole dihydrochloride	370882-57-8
4-[(3-nitropyridin-2-yl)amino]phenol	78750-61-5
1-(2-fluoro-5-methylphenyl)-3-[4-(4,4,5,5-tetramethyl-1,3,2-dioxaborolan-2-yl)phenyl]urea	796967-18-5
N-{2-[(4-hydroxyphenyl)amino]pyridin-3-yl}-4-methoxybenzenesulfonamide hydrochloride	141450-48-8
1-[4-(3-amino-1H-indazol-4-yl)phenyl]-3-(2-fluoro-5-methylphenyl)urea hydrochloride	00-00-0
1-[4-(3-amino-1H-indazol-4-yl)phenyl]-3-(2-fluoro-5-methylphenyl)urea	796967-16-3
5,6-dichloro-N-(2,2-dimethoxyethyl)pyridin-3-amine	876068-46-1
[(3S,4S)-4-amino-1-(5,6-dichloropyridin-3-yl)pyrrolidin-3-yl]methanol	876068-51-8
(1S,5S)-3-(5,6-dichloropyridin-3-yl)-3,6-diazabicyclo[3.2.0]heptane benzenesulfonate	876170-44-4
DNA, d(T-sp-C-G-sp-T-sp-C-G-sp-T-sp-T-sp-T-sp-G-sp-A-sp-C-G-sp-T-sp-T-sp-T-sp-G-sp-T-sp-C-G-sp-T-sp-T)	665058-78-6
4-(4-[[[(2S,4R)-4-[acetyl(4-chlorophenyl)amino]-2-methyl-3,4-dihydroquinolin-1(2H)-yl]carbonyl]phenoxy]-2,2-dimethylbutanoic acid	868210-14-4
4-[4-({3-[(4-deoxy-4-fluoro-b-D-glucopyranosyl)oxy]-5-(propan-2-yl)-1H-pyrazol-4-yl)methyl}phenyl)-N-[1,3-dihydroxy-2-(hydroxymethyl)propan-2-yl]butanamide	871484-32-1
2-({[(1R,3S)-3-[[2-(3-methoxyphenyl)-5-methyl-1,3-oxazol-4-yl]methoxy]cyclohexyl]oxy)methyl}-6-methylbenzoic acid	710281-33-7
2-(4-methoxybenzyl)thiophen-3-yl β-D-glucopyranoside	647834-15-9
5-(benzylamino)-2-(3-methoxyphenyl)-7-(4-methylpiperazin-1-yl)[1,2,4]triazolo[1,5-a]quinoline-4-carbonitrile -- (2E)-but-2-enedioate (2:1) hydrate	00-00-0
3-[2-chloro-4-({4-methyl-2-[4-(trifluoromethyl)phenyl]-1,3-thiazol-5-yl}methoxy)phenyl]-1,2,4-oxadiazol-5(4H)-one	866920-24-3
2-[3-(6-[[2-(2,4-dichlorophenyl)ethyl]amino]-2-methoxypyrimidin-4-yl)phenyl]-2-methylpropanoic acid phosphate	934815-71-1
(2Z)-[(acetyloxy)imino](2-amino-1,3-thiazol-4-yl)ethanoic acid	110130-88-6
2-(2,3-dihydro-1H-inden-2-yl)propan-2-amine hydrochloride	1034457-07-2
(2R)-1-(5-bromo-2,3-difluorophenoxy)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]propan-2-ol hydrochloride	1035455-90-3
ethyl (2E)-3-(3-[[2-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy)-4,5-difluorophenylprop-2-enoate hydrochloride	1035455-87-8
(3S,6R,9S,12R,15S,18R,21S,24R)-6,18-dibenzyl-4,10,12,16,22,24-hexamethyl-3,9,15,21-tetrakis(2-methylpropyl)-1,7,13,19-tetraoxa-4,10,16,22-tetraazacyclotetracosane-2,5,8,11,14,17,20,23-octone	133413-70-4
2-(cyclohexylmethyl)-N-{2-[(2S)-1-methylpyrrolidin-2-yl]ethyl}-1,2,3,4-tetrahydroisoquinoline-7-sulfonamide di[(2E)-but-2-enedioate] hydrate	00-00-0

5-fluoro-1-(3-fluorobenzyl)-N-(1H-indol-5-yl)-1H-indole-2-carboxamide	00-00-0
(+)-5-[6-(1-methyl-1H-pyrazol-4-yl)pyridin-3-yl]-1-azabicyclo[3.2.1]octane	925978-49-0
7-chloro-3-(6-methoxypyridin-3-yl)-N,N,5-trimethyl-4-oxo-4,5-dihydro-3H-pyridazino[4,5-b]indole-1-carboxamide	550349-58-1
N-[(S)-1-azabicyclo[2.2.2]oct-2-yl(phenyl)methyl]-2,6-dichloro-3-(trifluoromethyl)benzamide hydrochloride	00-00-0
4-(2-chloro-4-methoxy-5-methylphenyl)-N-[(1S)-2-cyclopropyl-1-(3-fluoro-4-methylphenyl)ethyl]-5-methyl-N-(prop-2-yn-1-yl)-1,3-thiazol-2-amine	752253-39-7
2-amino-2-oxoethyl{3-[trans-5-(6-methoxynaphthalen-1-yl)-1,3-dioxan-2-yl]propyl}carbamate	666860-59-9
N-(5-fluoro-3-methyl-1H-indol-1-yl)-4-methyl-2-(pyridin-2-yl)pyrimidine-5-carboxamide	00-00-0
DNA (synthetic plasmid vector pCOR human interferon b signal peptide fusion protein with 21-154-human acidic fibroblast growth factor-specifying)	1001859-46-6
1-[(2R,5S)-5-(hydroxymethyl)-2,5-dihydrofuran-2-yl]-5-methylpyrimidine-2,4(1H,3H)-dione -- 1-methylpyrrolidin-2-one (1:1)	165172-60-1
[(1R,5S)-5-[dimethyl(phenyl)silyl]-2-[(2-methoxypropan-2-yl)oxy]methyl]cyclopent-2-en-1-yl]methanol	701278-08-2
{(4S,5R)-5-[(benzyloxy)methyl]-4-[dimethyl(phenyl)silyl]cyclopent-1-en-1-yl}methanol	701278-09-3
2-amino-9-[(1S,3R,4S)-3-[(benzyloxy)methyl]-4-[dimethyl(phenyl)silyl]-2-methylidenecyclopentyl]-1,9-dihydro-6H-purin-6-one methanesulfonate (2:1)	1032066-96-8
2-amino-N-(2-chloro-6-methylphenyl)-1,3-thiazole-5-carboxamide	302964-24-5
N-(2-chloro-6-methylphenyl)-2-[(6-chloro-2-methylpyrimidin-4-yl)amino]-1,3-thiazole-5-carboxamide	302964-08-5
4,6-dichloro-2-methylpyrimidine	1780-26-3
tert-butyl [(1S)-2-[(1S,3S,5S)-3-cyano-2-azabicyclo[3.1.0]hex-2-yl]-1-(3-hydroxytricyclo[3.3.1.1(3,7)]dec-1-yl)-2-oxoethyl]carbamate	709031-43-6
{2-[(tert-butoxycarbonyl)amino]-3-hydroxytricyclo[3.3.1.1(3,7)]dec-1-yl}acetic acid	361442-00-4
(1S,3S,5S)-2-azabicyclo[3.1.0]hexane-3-carboxamide methanesulfonate	709031-45-8
(3-hydroxytricyclo[3.3.1.1(3,7)]dec-1-yl)(oxo)acetic acid	709031-28-7
tert-butyl (1S,3S,5S)-3-carbamoyl-2-azabicyclo[3.1.0]hexane-2-carboxylate	361440-67-7
tert-butyl (2S)-2-carbamoyl-2,3-dihydro-1H-pyrrole-1-carboxylate	709031-38-9
5-methyl-4-oxo-1,4-dihydropyrrolo[2,1-f][1,2,4]triazin-6-yl 2,2-dimethylpropanoate	872206-47-8
4-[(4-fluoro-2-methyl-1H-indol-5-yl)oxy]-5-methylpyrrolo[2,1-f][1,2,4]triazin-6-yl 2,2-dimethylpropanoate	952490-01-6
(2R)-1-({4-[(4-fluoro-2-methyl-1H-indol-5-yl)oxy]-5-methylpyrrolo[2,1-f][1,2,4]triazin-6-yl}oxy)propan-2-ol	649735-46-6
(2R)-2-methyloxirane	15448-47-2
N-benzyloxycarbonyl-L-alanine	1142-20-7

ethyl 1-(4-methoxyphenyl)-6-(4-nitrophenyl)-7-oxo-4,5,6,7-tetrahydro-1H-pyrazolo[3,4-c]pyridine-3-carboxylate	536759-91-8
ethyl 1-(4-methoxyphenyl)-7-oxo-6-[4-(2-oxopiperidin-1-yl)phenyl]-4,5,6,7-tetrahydro-1H-pyrazolo[3,4-c]pyridine-3-carboxylate	503614-91-3
ethyl (2Z)-chloro[2-(4-methoxyphenyl)hydrazinylidene]ethanoate	473927-63-8
3-chloro-1-(4-nitrophenyl)-5,6-dihydropyridin-2(1H)-one	536760-29-9
4-(5-bromo-2-chlorobenzyl)phenyl ethyl ether	461432-23-5
but-2-yne-1,4-diol -- methyl 1-C-[4-chloro-3-(4-ethoxybenzyl)phenyl]- α -D-glucopyranoside (1:1)	960404-59-5
(1S)-2,3,4,6-tetra-O-acetyl-1,5-anhydro-1-[4-chloro-3-(4-ethoxybenzyl)phenyl]-D-glucitol	461432-25-7
N-{5-[(diphenylphosphoryl)methyl]-4-(4-fluorophenyl)-6-(propan-2-yl)pyrimidin-2-yl}-N-methylmethanesulfonamide	289042-10-0
(3-[[{(2R,3S)-2-((1R)-1-[3,5-bis(trifluoromethyl)phenyl]ethoxy)-3-(2-fluorophenyl)morpholin-4-yl]methyl]-5-oxo-2,5-dihydro-1H-1,2,4-triazol-1-yl)phosphonic acid -- 1-deoxy-1-(methylamino)-D-glucitol (1:2)	265121-04-8
methyl 1-tert-butyl-2-hydroxy-1H-pyrrolo[2,3-b]pyridine-3-carboxylate	00-00-0
[(8R)-8-(3,5-difluorophenyl)-10-oxo-6,9-diazaspiro[4.5]dec-9-yl]acetic acid	957187-34-7
2,3-dihydroxy-2,3-bis(phenylcarbonyl)butanedioic acid -- ethyl [(8R)-8-(3,5-difluorophenyl)-10-oxo-6,9-diazaspiro[4.5]dec-9-yl]acetate (1:1)	00-00-0
2,2,2-trifluoro-1-[4'-(methylsulfonyl)biphenyl-4-yl]ethanone	893407-18-6
[2-(chloromethyl)-4-(dibenzylamino)phenyl]methanol hydrochloride	00-00-0
4-fluoro-L-leucine -- ethyl hydrogen sulfate (1:1)	848949-85-9
4-(4-fluorophenyl)-7-(isothiocyanatomethyl)-2H-chromen-2-one	00-00-0
3-[[6-(ethylsulfonyl)pyridin-3-yl]oxy]-5-[[{(2S)-1-hydroxypropan-2-yl]oxy]benzoic acid -- 1,4-diazabicyclo[2.2.2]octane (2:1)	1137917-12-4
methyl (5R,7S,10S)-10-tert-butyl-15,15-dimethyl-3,9,12-trioxo-6,7,9,10,11,12,14,15,16,17,18,19-dodecahydro-1H,5H-2,23:5,8-dimethano-4,13,2,8,11-benzodioxatriazacyclohenicosine-7(3H)-carboxylate	923591-06-4
(1R,2R)-1-[(cyclopropylsulfonyl)carbamoyl]-2-ethylcyclopropanaminium 4-methylbenzenesulfonate	1198178-65-2
2-hydroxy-2-(trifluoromethyl)butanehydrazide	910656-45-0
4-(ethylamino)piperidine-4-carboxamide	84100-54-9
6-(hydroxymethyl)-4-phenyl-3,4-dihydro-2H-chromen-2-ol	959624-24-9
3-((3R,4R)-4-methyl-3-[methyl(7H-pyrrolo[2,3-d]pyrimidin-4-yl)amino]piperidin-1-yl)-3-oxopropanenitrile 2-hydroxypropane-1,2,3-tricarboxylate	540737-29-9
2,4-dichloro-7H-pyrrolo[2,3-d]pyrimidine	90213-66-4
1-((4-[[[2-oxo-3-(propan-2-yl)-2,3-dihydro-1H-benzimidazol-1-yl]carbonyl]amino)methyl]piperidin-1-yl)methyl)cyclobutanecarboxylic acid	871022-14-9

1-[(4-[(tert-butoxycarbonyl)amino]methyl)piperidin-1-yl)methyl]cyclobutanecarboxylic acid	871022-19-4
1-(propan-2-yl)-1,3-dihydro-2H-benzimidazol-2-one	35681-40-4
S-[(1R,3S)-1-oxidotetrahydrothiophen-3-yl] ethanethioate	120788-03-6
2,8-dimethyl-5-[2-(6-methylpyridin-3-yl)ethyl]-2,3,4,5-tetrahydro-1H-pyrido[4,3-b]indole	3613-73-8
2,8-dimethyl-2,3,4,5-tetrahydro-1H-pyrido[4,3-b]indole	19686-05-6
(3R)-3-cyclopentyl-3-[4-(7H-pyrrolo[2,3-d]pyrimidin-4-yl)-1H-pyrazol-1-yl]propanenitrile	941678-49-5
3-cyclopentylprop-2-enenitrile	591769-05-0
1-(1-ethoxyethyl)-4-(4,4,5,5-tetramethyl-1,3,2-dioxaborolan-2-yl)-1H-pyrazole	1029716-44-6
4-(1H-pyrazol-4-yl)-7-[[2-(trimethylsilyl)ethoxy]methyl]-7H-pyrrolo[2,3-d]pyrimidine	941685-27-4
(3S)-3-cyclopentyl-3-[4-(7-[[2-(trimethylsilyl)ethoxy]methyl]-7H-pyrrolo[2,3-d]pyrimidin-4-yl)-1H-pyrazol-1-yl]propanenitrile	941685-41-2
(3R)-3-cyclopentyl-3-[4-(7-[[2-(trimethylsilyl)ethoxy]methyl]-7H-pyrrolo[2,3-d]pyrimidin-4-yl)-1H-pyrazol-1-yl]propanenitrile	941685-40-1
3-cyclopentyl-3-[4-(7-[[2-(trimethylsilyl)ethoxy]methyl]-7H-pyrrolo[2,3-d]pyrimidin-4-yl)-1H-pyrazol-1-yl]propanenitrile	941685-39-8
4-chloro-7H-pyrrolo[2,3-d]pyrimidine	3680-69-1
(3S,5R)-3-amino-5-methyloctanoic acid hydrochloride	610300-00-0
(3S,5R)-3-amino-5-methyloctanoic acid	610300-07-7
(3R)-3-methylhexanoic acid	22328-90-1
(2R,3R)-2,3-dimethylbutane-1,4-diyl bis(4-methylbenzenesulfonate)	281214-27-5
4-(1-aminocyclopropyl)-2,3,5-trifluorobenzoic acid	143785-86-8
4-[1-(acetylamino)cyclopropyl]-2,3,5-trifluorobenzoic acid	143785-87-9
(6R)-6-cyclopentyl-6-[2-(2,6-diethylpyridin-4-yl)ethyl]-3-[(5,7-dimethyl[1,2,4]triazolo[1,5-a]pyrimidin-2-yl)methyl]-4-hydroxy-5,6-dihydro-2H-pyran-2-one	877130-28-4
5,7-dimethyl[1,2,4]triazolo[1,5-a]pyrimidine-2-carbaldehyde	55293-96-4
4-bromo-2,6-diethylpyridine 4-methylbenzenesulfonate	927889-51-8
sodium 2-amino-2-phenylbutanoate	94133-84-3
methyl 2-(dimethylamino)-2-phenylbutanoate	39068-93-4
3-(4-chlorophenyl)-N-methyl-4-phenyl-4,5-dihydro-1H-pyrazole-1-carboximidamide	1035675-24-1
(4S)-3-(4-chlorophenyl)-N-methyl-4-phenyl-4,5-dihydro-1H-pyrazole-1-carboximidamide 2,3-dihydroxybutanedioate	1035677-60-1
(3,3-difluoropyrrolidin-1-yl){(2S,4S)-4-[4-(pyrimidin-2-yl)piperazin-1-yl]pyrrolidin-2-yl}methanone	869490-23-3
3,3-difluoropyrrolidine hydrochloride	163457-23-6

6-iodo-1H-indazole	261953-36-0
(-)-3-{3-bromo-4-[(2,4-difluorobenzyl)oxy]-6-methyl-2-oxopyridin-1(2H)-yl}-N,4-dimethylbenzamide	586414-48-4
methyl 3-(4-hydroxy-6-methyl-2-oxopyridin-1(2H)-yl)-4-methylbenzoate	586379-61-5
(1S)-1-amino-3-methyl-1,3,4,5-tetrahydro-2H-3-benzazepin-2-one hydrochloride	425663-71-4
L- α -aspartyl-L- α -glutamyl-L-asparaginy-L-prolyl-L-valyl-L-valyl-L-histidyl-L-phenylalanyl-L-phenylalanyl-L-lysyl-L-asparaginy-L-isoleucyl-L-valyl-L-threonyl-L-prolyl-L-arginyl-L-threonine	152074-97-0
L- α -aspartyl-L- α -glutamyl-L-asparaginy-L-prolyl-L-valyl-L-valyl-L-histidyl-L-phenylalanyl-L-phenylalanyl-L-lysyl-L-asparaginy-L-isoleucyl-L-valyl-L-threonyl-L-prolyl-L-arginyl-L-threonine tetraacetate	781666-30-6
N4-[(4-fluorophenyl)methyl]-2-nitro-1,4-benzenediamine	150812-21-8
ethyl {4-[(4-fluorobenzyl)amino]-2-nitrophenyl}carbamate	150812-23-0
2,3-diaminobenzamide dihydrochloride	266993-72-0
1-(tert-butoxycarbonyl)-2-methyl-D-proline	166170-15-6
2-[(2S)-2-methylpyrrolidin-2-yl]-1H-benzimidazole-4-carboxamide dihydrochloride	912445-36-4
2-[(2R)-2-methylpyrrolidin-2-yl]-1H-benzimidazole-4-carboxamide	912444-00-9
1-(2-nitrobenzyl)-1H-pyrrole-2-carbaldehyde	22162-51-2
5-fluoro-2-methylbenzoyl chloride	21900-39-0
2-chloro-4-[[[(5-fluoro-2-methylphenyl)carbonyl]amino]benzoic acid	168080-49-7
ethyl 3-amino-4-[2-(1,3-dioxo-1,3-dihydro-2H-isoindol-2-yl)ethoxy]but-2-enoate	265136-65-0
N-(4-chloro-3-cyano-7-ethoxyquinolin-6-yl)acetamide	848133-76-6
2-((2-chloro-4-nitrophenoxy)methyl)pyridine	179687-79-7
(E)-4-(dimethylamino)but-2-enoic acid hydrochloride	848133-35-7
2-cyano-N-(2,4-dichloro-5-methoxy phenyl)acetamide	846023-24-3
2-(3-chloropropoxy)-1-methoxy-4-nitrobenzene	92878-95-0
benzyl (3S)-6,7-dimethoxy-1,2,3,4-tetrahydroisoquinoline-3-carboxylate hydrochloride	103733-32-0
benzyl (2S,3aS,6aS)-octahydrocyclopenta[b]pyrrole-2-carboxylate hydrochloride	87269-87-2
1,1'-binaphthalene-2,2'-diol --5-methoxy-2-((S)-[(4-methoxy-3,5-dimethylpyridin-2-yl)methyl]sulfinyl)-1H-benzimidazole(1:1)	272776-12-2
5,7-dioxo-6-thiaspiro[2.5]octane-6-oxide	89729-09-9
(S)-3-(dimethylamino)-1-(thiophen-2-yl)propan-1-ol	132335-44-5
(3S)-N,N-dimethyl-3-(naphthalen-1-yloxy)-3-(thiophen-2-yl)propan-1-amine	132335-46-7

methyl 2-((R)-3-(3-((E)-2-(7-chloroquinolin-2-yl)vinyl)phenyl)-3-(((1-(hydroxymethyl)cyclopropyl)methyl)sulfanyl)propyl)benzoate hydrochloride	00-00-0
(2Z)-{[(1-tert-butoxy-2-methyl-1-oxopropan-2-yl)oxy]imino}[2-(tritylamino)-1,3-thiazol-4-yl]ethanoic acid	68672-66-2
1-(pyridin-4-yl)pyridinium chloride hydrochloride	5421-92-1
2-(3-chloropropyl)-2-(4-fluorophenyl)-1,3-dioxolane	3308-94-9
1-{1-[4-(4'-fluorophenyl)-4,4-ethylenedioxybutyl]-1,2,3,6-tetrahydro-4-pyridinyl]-1,3-dihydro-benzimidazol-2-one	00-00-0
2,5-bis(2,2,2-trifluoroethoxy)benzoic acid	35480-52-5
1-phenyl-3-oxabicyclo[3.1.0]hexan-2-one	63106-93-4
N2-[(benzyloxy)carbonyl]-L-glutaminy-L-asparaginy-L-S-benzyl-L-cysteiny-L-prolyl-L-leucylglycinamide	21688-11-9
(2R)-3-(benzylsulfanyl)-N-[(2S)-1-[[2S,3S]-1-hydrazinyl-3-methyl-1-oxopentan-2-yl]amino]-	39570-96-2
3-chloro-6-methyldibenzo[c,f][1,2]thiazepin-11(6H)-one 5,5-dioxide	26638-53-9
3-alpha-hydroxy-7-oxo-5-beta-cholan-24-oic acid	4651-67-6
diethyl ethyl(1-methylbutyl)malonate	76-72-2
6-fluoro-3-oxo-3,4-dihydropyrazine-2-carbonitrile -- N-cyclohexylcyclohexanamine (1:1)	1137606-74-6
ethyl 6-bromo-5-hydroxy-1-methyl-2-[(phenylsulfanyl)methyl]-1H-indole-3-carboxylate	131707-24-9
(2S-3aS,7aS)-octahydro-1H-indole-2-carboxylic acid	80875-98-5
N-[(2S)-1-ethoxy-1-oxopentan-2-yl]-L-alanine	82834-12-6
3-((E)-2-[(3R)-pyrrolidin-3-yl]ethenyl)-5-(tetrahydro-2H-pyran-4-yloxy)pyridine	753015-42-8
4,6-dichloro-5-nitro-2-(propylsulfanyl)pyrimidine	145783-14-8
(3aR,4S,6R,6aS)-2,2-dimethyl-6-(2-methylidene-4-phenylbutyl)tetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-ol	274693-53-7
poly(oxy-1,2-ethanediyl), α -hydro- ω -methoxy, diester with 21N6, 21'N6-[[[(N2, N6-dicarboxy-L-lysyl- β -alanyl)imino]bis(1-oxo-2, 1-ethanediyl)]bis[N-acetylglycyl-L-leucyl-L-tyrosyl-L-alanyl-L-cysteiny-L-histidyl-L-methionylglycyl-L-prolyl-L-isoleucyl-L-threonyl-3-(1-naphthalenyl)-L-alanyl-L-valyl-L-cysteiny-L-glutaminy-L-prolyl-L-leucyl-L-arginyl-N-methylglycyl-L-lysine] cyclic (6 \rightarrow 15), (6' \rightarrow 15') bis(disulfide)	913976-27-9
(1S,3S,6S,9S,12S,14R,16R,18S,20R,21R,22S,26R,29S,31R,32S,33R,35R,36S)-20-[(2S)-3-amino-2-hydroxypropyl]-21-methoxy-14-methyl-8,15-bis(methylene)-2,19,30,34,37,39,40,41-octaoxanonacyclo[24.9.2.13,32.13,33.16,9.112,16.018,22.029,36.031,35]hentetracontan-24-one methanesulfonate	441045-17-6
4-chloro-3-methyl-1,2-oxazol-5-amine	166964-09-6
5-(chloromethyl)-6-methyl-1,3-benzodioxole	117661-72-0
methyl 3-(chlorosulfonyl)thiophene-2-carboxylate	59337-92-7
(S)-1-butyl-N-(2,6-dimethylphenyl)piperidine-2-carboxamide	27262-47-1

(3R,4R)-1-benzyl-N,4-dimethylpiperidin-3-amine dihydrochloride	1062580-52-2
(3S,4aS,8aR)-2-(methoxycarbonyl)-6-oxodecahydroisoquinoline-3-carboxylic acid --(1R)-1-phenylethanamine (1:1)	134388-95-7
(3S,4aS,6S,8aR)-6-hydroxy-2-(methoxycarbonyl)decahydroisoquinoline-3-carboxylic acid	503293-98-9
5-(2-chloro-6-fluorophenyl)-2H-tetrazole	503293-47-8
(3S,4aS,6S,8aR)-6-[3-chloro-2-(2H-tetrazol-5-yl)phenoxy]decahydro-3-isoquinolinecarboxylic acid hydrochloride	503290-66-2
2-ethylbutyl (3S,4aS,6S,8aR)-6-[3-chloro-2-(1H-tetrazol-5-yl)phenoxy]decahydro-3-isoquinolinecarboxylate 4-methylbenzenesulfonate	503291-53-0
5-{{[3,5-diethyl-1-(2-hydroxyethyl)-1H-pyrazol-4-yl]oxy}benzene-1,3-dicarbonitrile	473921-12-9
4-chloro-heptane-3,5-dione	13054-81-4
5-hydroxybenzene-1,3-dicarbonitrile	79370-78-8
methyl 2-((R)-3-(3-((E)-2-(7-chloroquinolin-2-yl)vinyl)phenyl)-3-(((1-(hydroxymethyl)cyclopropyl)methyl)sulfanyl)propyl)benzoate	936359-25-0

APPENDIX B

USITC's *Federal Register* Notice of Institution

Under the Alternative Technologies alternative, waste heat would involve the export of processed steam, instead of the steam being converted to electricity through the use of a steam turbine under the proposed alternative. Export of processed steam would necessitate a nearby steam host. There are no steam hosts currently available near the existing LECEF Phase 1 site; therefore, a steam host would have to be constructed, resulting in additional impacts outside of the existing 34-acre site.

Under the proposed action alternative, we would issue an incidental take permit for the applicant's proposed project, which includes the activities described above and in more detail in the HCP. The proposed action alternative is not expected to result in the permanent loss of habitat for any of the Covered Species. The proposed project is expected to result in indirect effects to 10,306 acres of serpentine grassland. To mitigate these effects, the applicant proposes to permanently protect 40 acres of serpentine grassland on Coyote Ridge, implement a monitoring and management plan for the Covered Species, establish a non-wasting endowment, and purchase Bay Area Air Quality Management District pollution credits.

National Environmental Policy Act

As described in our EAS, we have made the preliminary determination that approval of the proposed plan and issuance of the permit would qualify as a categorical exclusion under NEPA (42 U.S.C. 4321 *et seq.*), as provided by Federal regulations (40 CFR 1500, 5(k), 1507.3(b)(2), 1508.4) and the Department of the Interior Manual (516 DM 2 and 516 DM 8). Our EAS found that the proposed plan qualifies as a "low-effect" habitat conservation plan, as defined by our Habitat Conservation Planning Handbook (November 1996). Determination of low-effect habitat conservation plans is based on the following three criteria: (1) Implementation of the proposed plan would result in minor or negligible effects on federally listed, proposed, and candidate species and their habitats; (2) implementation of the proposed plan would result in minor or negligible effects on other environmental values or resources; and (3) impacts of the plan, considered together with the impacts of other past, present, and reasonably foreseeable similarly situated projects, would not result, over time, in cumulative effects to environmental values or resources that would be considered significant. Based on the

preliminary determinations in the EAS, we do not intend to prepare further NEPA documentation. We will consider public comments when making the final determination on whether to prepare an additional NEPA document on the proposed action.

Public Review

We provide this notice pursuant to section 10(c) of the Act and the NEPA public-involvement regulations (40 CFR 1500.1(b), 1500.2(d), and 1506.6). We will evaluate the permit application, including the plan and comments we receive, to determine whether the application meets the requirements of section 10(a) of the Act. If the requirements are met, we will issue a permit to the applicant for the incidental take of the Bay checkerspot butterfly, coyote ceanothus, Metcalf Canyon jewel-flower, Santa Clara Valley dudleya, and Tiburon paintbrush from the implementation of the Covered Activities described in the plan, or from mitigation conducted as part of this plan. We will make the final permit decision no sooner than 30 days after the date of this notice.

Dated: June 7, 2010.

Susan K. Moore,

Field Supervisor, Sacramento Fish and Wildlife Office, Sacramento, California.

[FR Doc. 2010-14322 Filed 6-14-10; 8:45 am]

BILLING CODE 4310-55-P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 731-TA-149 (Third Review)]

Barium Chloride From China

Determination

On the basis of the record¹ developed in the subject five-year review, the United States International Trade Commission (Commission) determines, pursuant to section 751(c) of the Tariff Act of 1930 (19 U.S.C. 1675(c)), that revocation of the antidumping duty order on barium chloride from China would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

Background

The Commission instituted this review effective July 1, 2009 (74 FR 31757, July 2, 2009) and determined on October 5, 2009 that it would conduct

¹ The record is defined in sec. 207.2(f) of the Commission's Rules of Practice and Procedure (19 CFR 207.2(f)).

a full review (74 FR 54069, October 21, 2009). Notice of the scheduling of the Commission's review and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the **Federal Register** on November 30, 2009 (74 FR 62587). Counsel for the domestic interested party filed a request to appear at the hearing or, in the alternative, for consideration of cancellation of the hearing. Counsel indicated a willingness to submit written testimony and responses to any questions by a date to be specified by the Commission in lieu of an actual hearing. No other party filed a request to appear at the hearing. Consequently, the public hearing in connection with the review, scheduled for April 15, 2010, was cancelled (75 FR 20625, April 20, 2010).

The Commission transmitted its determination in this review to the Secretary of Commerce on June 9, 2010. The views of the Commission are contained in USITC Publication 4157 (June 2010), entitled *Barium Chloride from China: Investigation No. 731-TA-149 (Third Review)*.

By order of the Commission.

Issued: June 9, 2010.

Marilyn R. Abbott,

Secretary to the Commission.

[FR Doc. 2010-14234 Filed 6-14-10; 8:45 am]

BILLING CODE 7020-02-P

INTERNATIONAL TRADE COMMISSION

[Investigation No. 332-520]

Pharmaceutical Products and Chemical Intermediates, Fourth Review: Advice Concerning the Addition of Certain Products to the Pharmaceutical Appendix to the HTS

AGENCY: United States International Trade Commission.

ACTION: Institution of investigation and invitation to file written submissions.

SUMMARY: Following receipt of a request dated May 27, 2010 from the United States Trade Representative (USTR) pursuant to section 115 of the Uruguay Round Agreements Act (URAA) (19 U.S.C. 3524) and section 332(g) of the Tariff Act of 1930 (19 U.S.C. 1332 (g)), the U.S. International Trade Commission (Commission) instituted investigation No. 332-520, *Pharmaceutical Products and Chemical Intermediates, Fourth Review: Advice Concerning the Addition of Certain*

Products to the Pharmaceutical Appendix to the HTS.

DATES:

July 14, 2010: Deadline for filing all written submissions.

September 1, 2010: Transmittal of Commission report to the United States Trade Representative.

ADDRESSES: All Commission offices, including the Commission's hearing rooms, are located in the United States International Trade Commission Building, 500 E Street SW., Washington, DC. All written submissions should be addressed to the Secretary, United States International Trade Commission, 500 E Street, SW., Washington, DC 20436. The public record for this investigation may be viewed on the Commission's electronic docket (EDIS) at <http://www.usitc.gov/secretary/edis.htm>.

FOR FURTHER INFORMATION CONTACT:

Information specific to this investigation may be obtained from Philip Stone, Project Leader, Office of Industries (202-205-3424 or philip.stone@usitc.gov). For information on the legal aspects of this investigation, contact William Gearhart of the Commission's Office of the General Counsel (202-205-3091 or william.gearhart@usitc.gov). The media should contact Margaret O'Laughlin, Office of External Relations (202-205-1819 or margaret.olaughlin@usitc.gov). Hearing-impaired individuals may obtain information on this matter by contacting the Commission's TDD terminal at 202-205-1810. General information concerning the Commission may also be obtained by accessing its Internet server (<http://www.usitc.gov>). Persons with mobility impairments who will need special assistance in gaining access to the Commission should contact the Office of the Secretary at 202-205-2000.

Background: As indicated in the USTR's letter, as part of the Uruguay Round negotiations, the United States and 21 other countries agreed to eliminate duties on certain pharmaceutical products and chemical intermediates used primarily for the production of pharmaceuticals (pharmaceuticals zero-for-zero initiative) and to conduct periodic reviews to identify further products that could be covered by this duty elimination initiative. As a result of multilateral negotiations in the WTO in 1996, 1998, and 2006, the United States and other participants eliminated duties on additional pharmaceutical items. The USTR indicated that participants in the zero-for-zero initiative are conducting a fourth review to determine if products

can be added to the initiative. As part of the consultation and layover requirements in section 115 of the URAA relating to an action by the President to eliminate U.S. duties on additional pharmaceutical products and chemical intermediates, the President must obtain advice regarding the proposed action from the U.S. International Trade Commission.

The USTR asked the Commission to provide advice in the form of information on the pharmaceutical products and chemical intermediates proposed for addition to the pharmaceuticals zero-for-zero initiative as follows: (1) A summary description of the products currently covered under the initiative as set out in the Pharmaceutical Appendix to the U.S. Harmonized Tariff Schedule (Appendix) and those proposed to be added to that Appendix; (2) an explanation of the relationship between the various elements in the Appendix and the Harmonized Tariff Schedule of the United States; and (3) an estimate of current U.S. imports and, where possible, current U.S. exports of the products included in the current Pharmaceutical Appendix and the proposed additions to the Appendix, based on product groupings as necessary.

The Commission has posted a list of the proposed additions to the Pharmaceutical Appendix on its Web site at http://www.usitc.gov/research_and_analysis/ongoing/332_520_request_letter.pdf. The Commission expects to provide its report to the USTR by September 1, 2010.

Written Submissions: Interested parties are invited to file written submissions concerning this investigation. All written submissions should be addressed to the Secretary, and should be received not later than 5:15 p.m., July 14, 2010. All written submissions must conform with the provisions of section 201.8 of the *Commission's Rules of Practice and Procedure* (19 CFR 201.8). Section 201.8 requires that a signed original (or a copy so designated) and fourteen (14) copies of each document be filed. In the event that confidential treatment of a document is requested, at least four (4) additional copies must be filed, in which the confidential information must be deleted (see the following paragraph for further information regarding confidential business information). The Commission's rules authorize filing submissions with the Secretary by facsimile or electronic means only to the extent permitted by section 201.8 of the rules (see Handbook

for Electronic Filing Procedures, http://www.usitc.gov/secretary/fed_reg_notices/rules/documents/handbook_on_electronic_filing.pdf). Persons with questions regarding electronic filing should contact the Secretary (202-205-2000).

Any submissions that contain confidential business information must also conform with the requirements of section 201.6 of the Commission's *Rules of Practice and Procedure* (19 CFR 201.6). Section 201.6 of the rules requires that the cover of the document and the individual pages be clearly marked as to whether they are the "confidential" or "non-confidential" version, and that the confidential business information be clearly identified by means of brackets. All written submissions, except for confidential business information, will be made available for inspection by interested parties.

In his request letter, the USTR stated that he intends to make the Commission's report available to the public in its entirety, and asked that the Commission not include any confidential business information or national security classified information in the report that the Commission sends to the USTR. Any confidential business information received by the Commission in this investigation and used in preparing this report will not be published in a manner that would reveal the operations of the firm supplying the information.

By order of the Commission.

Issued: June 9, 2010.

Marilyn R. Abbott,

Secretary to the Commission.

[FR Doc. 2010-14236 Filed 6-14-10; 8:45 am]

BILLING CODE 7020-02-P

DEPARTMENT OF JUSTICE

Notice of Lodging of First Material Modification to a Consent Decree Pursuant to the Clean Air Act

Notice is hereby given that on June 9, 2010, a proposed First Material Modification to the Consent Decree entered in *United States and the State of Kansas v. Coffeyville Resources Refining & Marketing, LLC et al.*, 04-cv-01064 (D. Kan. 2004), was lodged with the United States Court for the District of Kansas.

The Consent Decree, entered by the Court on July 13, 2004 (Docket No. 8), required Defendants to install certain air pollution controls to reduce emissions of oxides, sulfur dioxide and particulate matter at their oil refinery located in

APPENDIX C

Written Submissions to the USITC

11 Dupont Circle, NW
Suite 500
Washington, DC 20036

Tel: 202 483-0070
Fax: 202 483-0092
www.barnesrichardson.com

July 14, 2010

475 Park Avenue South
New York, NY 10016
Tel: 212 725-0200
Fax: 212 889-4135

303 East Wacker Drive
Suite 1020
Chicago, IL 60601
Tel: 312 565-2000
Fax: 312 565-1782

BICBI 10-292

The Honorable Marilyn R. Abbott
Secretary to the Commission
United States International Trade Commission
500 E. Street, S.W.
Washington, DC 20436

Business Proprietary Information
Deleted from Brackets [] at
Attachment 1

PUBLIC VERSION

Re: Inv. No. 332-TA-520; Advice Concerning the Addition of Certain
Pharmaceutical Products and Chemical Intermediates to the
Pharmaceutical Appendix of the HTS

Dear Secretary Abbott:

On behalf of the Pharmaceutical Research and Manufacturers of America
("PhRMA") and pursuant to the invitation for comments published at 75 Fed. Reg. 33824
(June 15, 2010), we hereby submit our written statement concerning the above-referenced
investigation. PhRMA and its members strongly support the current proposed update to
the pharmaceutical zero-for-zero tariff agreement, which will benefit the industry and
consumers by eliminating unnecessary tariff barriers to the movement of pharmaceutical
products and sole—pharmaceutical-use intermediates in international commerce.

In these comments, PhRMA members and participants in the global coalition
known as the International Committee for the Elimination of Pharmaceutical Tariffs
(INTERCEPT) provide initial data on the potential impact on trade of the current update,
and the addition of specified compounds to the annexes to the zero-for-zero agreement.

Similar to previous update rounds, it is extremely difficult to estimate the future value of trade in the specified products, most of which are either in early stages of development, or the regulatory approval process, or have been approved for patient use but have not yet been sold in significant commercial volumes, and thus, it is unknown how much input product will be required and in which markets for final formulation of the downstream medicament. Furthermore, even assuming regulatory approval is eventually granted for drugs currently under development, the volume of trade may or may not increase significantly or may increase more than projected, depending on future demand for an individual drug. Finally, the list of requested compounds may include a number of intermediates for the same end product, not all of which will eventually be traded in commercial volumes, depending on the synthetic chemistry and economic rationalization of production of various intermediates at various sites. One of the primary justifications for reciprocal zero tariff treatment is to accommodate these considerations without imposing unnecessary tax barriers to the development of critical new drugs for all of the participating markets.

The US Trade Representative's letter on which this investigation is based, requested an estimate of current US imports and exports of compounds on the current Pharmaceutical Appendix, and the proposed additions to the Appendix. 75, Fed. Reg 33,825. Attachment 1 hereto contains an estimate of the 2010 import and export values for the products proposed to be added to the Appendix in this update negotiation, to the extent such information has been made available by the supplying companies. As noted above, for many of the requested compounds, the primary trade impact is not immediately reflected in direct US imports or exports, since many of the compounds are

still in development in 2010, or are primarily traded between other participants in the zero-for-zero agreement. Nonetheless, U.S. businesses benefit from this reciprocal duty free treatment to the extent that several hundred million dollars are invested by these global enterprises in the US and elsewhere in the development of these drugs. Due to the large number of products covered by this update, we are still receiving information from members concerning their trade in the subject chemicals, and will provide such information to the Commission immediately, as it becomes available.

As an alternative method of calculating potential trade impact, Attachment 2 contains data from the USITC Dataweb and estimates the potential impact of the update projected to become effective in 2011, based on the level of U.S. imports before and after the last update of the Pharmaceutical Appendix on January 1, 2007.¹ In the three year period preceding the 2007 update (years 2004-2006), the U.S. imported an average of \$19.8 billion worth of products eligible for duty free treatment under the “K” (Pharmaceutical) program per year. After the January 1, 2007 update, imports increased to an average annual value of \$23.5 billion during the period of 2007-2009.

It is difficult to calculate an actual assessed duty impact, due to changes in duty rates over the period and the use of duty deferral or avoidance procedures (e.g., bonded entry, drawback, foreign trade zone processing and temporary tariff suspension). However, assuming a 6.5% duty rate for all items (the highest current rate for the subject HTSUS items in Chapter 29), one can calculate an average annual duty impact of \$239 million resulting from the 2007 update for years 2007-2009. If this number is divided by the number of products added to the appendixes in the last update round (1,289) and the

¹ See Proclamation 8095--To Eliminate Tariffs on Certain Pharmaceuticals and Chemical Intermediates, 72 F.R. 429 (January 4, 2007)

result multiplied by the number of items in the 2011 update (757)², the product suggests an annual duty impact of \$140 million resulting from the proposed 2011 update, assuming that the coverage is limited only to those compounds already published for review by USTR.

We emphasize that this is likely an overestimate, and should be considered the absolute upper limit, of any potential trade impact. First, it must be noted that not all of the additional 2011 products were previously assessed at a 6.5 percent tariff rate, as assumed above, and even those that are may have benefitted from duty deferral procedures both in the US and our trading partners. Second, the increased imports following the 2007 update likely are not entirely attributable to the tariff elimination for the compounds covered by that update. Some of the increased imports were likely precipitated by increased market demand for products on the list which was generated prior to 2007. However, the duty free treatment afforded by the 2007 update supported the pre-market development and post-approval sales of those new drug products.

We note that we cannot estimate any potential increase in US exports as a result of the current update, since similar statistical data are not readily available from the Census Bureau due to the absence of a Schedule B equivalent to the “K” program designation for imports. Therefore, we are projecting future impact from the results of prior update rounds under this zero-for-zero agreement, since common conditions are present in the market for new medicaments.

Finally, PhRMA and INTERCEPT note that they proposed a number of additional compounds to be included in the zero-for-zero update, in response to the US Trade Representative’s invitation for comments, 75 Fed. Reg. 11,986 (March 12, 2010);

² These numbers do not include prefixes and suffixes for INN salts, esters and hydrates.

submission of PhRMA dated April 9, 2010, attached (See attachment 3). For reasons of timing and administrative review which we understand have nothing to do with the qualification of these compounds to be added to the list, they are not under consideration in the current update round. If any articles are considered for addition to the proposed update Appendix, we re-iterate PhRMA's request to consider those included in its April 9, 2010 submission, and ask that the ITC report on the economic effects of those additions as appropriate.

Confidential Treatment is requested for certain bracketed, business proprietary information contained in this submission in accordance with 19 C.F.R. Part 201, for the following reason: Attachment 1 contains information concerning the value of imports and exports by specific companies, revealing the operations of these individual companies. Disclosure of the foregoing confidential information would likely either impair the Commission's ability to obtain information necessary to perform its functions, or would cause substantial harm to the competitive position of the submitting companies. A certification that substantially identical information is not otherwise available to the public is attached hereto.

Please contact the undersigned should you have any questions.

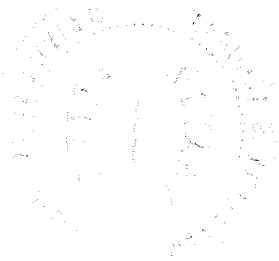
Respectfully submitted,



Matthew T. McGrath
BARNES, RICHARDSON & COLBURN
Counsel to PhRMA

Certification of Accuracy and Completeness

The undersigned attorney hereby certifies that information substantially identical to the information for which confidential treatment is requested is not available to the public. The undersigned further certifies that the information contained in this submission is accurate and complete to the best of his knowledge.



Matthew T. McGrath

Matthew T. McGrath, Esq.
BARNES, RICHARDSON & COLBURN
11 Dupont Circle, N.W. Suite 500
Washington, D.C. 20009
(202)483-0070

District of Columbia
Subscribed and sworn before me
This 14 day of July 2010

Reginald E. McFadgen

**REGINALD E. MCFADGEN
NOTARY PUBLIC
DISTRICT OF COLUMBIA
My Commission Expires
July 31, 2014**

Attachment 1

Attachment 1

Estimated 2010 Import & Export Values

Table 3: Proposed Chemical Intermediates

No.	ID	Submitter	Estimated 2010 Import Value	Estimated 2010 Export Value	CASRN	HS code	Preferred name	Synonyms
19	36				20059-73-8	2922.29	2-[4-(aminomethyl)phenoxy]-N,N-dimethylethanamine	4-[2-(dimethylamino)ethoxy]benzylamine; 4-[2-(dimethylamino)ethoxy]benzenemethanamine; p-[2-(dimethylamino)ethoxy]benzylamine; 2-[4-(aminomethyl)phenoxy]-N,N-dimethyl-ethanamine; Benzenemethanamine, 4-[2-(dimethylamino)ethoxy]-
111	160				414909-98-1	2933.39	benzyl 2-(4-fluoro-2-methylphenyl)-4-oxo-3,4-dihydropyridine-1(2H)-carboxylate	phenylmethyl 2-(4-fluoro-2-methylphenyl)-4-oxo-3,4-dihydro-1(2H)-pyridinecarboxylate; 1(2H)-Pyridinecarboxylic acid, 2-(4-fluoro-2-methylphenyl)-3,4-dihydro-4-oxo-, phenylmethyl ester
112	161				334477-60-0	2921.49	(1R)-1-[3,5-bis(trifluoromethyl)phenyl]-N-methylethanamine	(αR)-N,α-dimethyl-3,5-bis(trifluoromethyl)benzenemethanamine; Benzenemethanamine, N,α-dimethyl-3,5-bis(trifluoromethyl)-, (αR)-
113	162				414910-13-7	2933.39	(2S)-hydroxy(phenyl)ethanoic acid -- (2R)-2-(4-fluoro-2-methylphenyl)piperidin-4-one (1:1)	(R)-2-(4-fluoro-2-methylphenyl)-4-piperidinone (S)-α-hydroxybenzeneacetic acid salt (1:1); (2R)-2-(4-fluoro-2-methylphenyl)-4-piperidinone (αS)-α-hydroxybenzeneacetic acid (1:1)
114	164				56880-11-6	2933.39	ethyl [(3-endo)-8-methyl-8-azabicyclo[3.2.1]oct-3-yl]acetate	Ethyl (8-methyl-8-azabicyclo[3.2.1]oct-3-yl)acetate; 8-Azabicyclo[3.2.1]octane-3-acetic acid, 8-methyl-, ethyl ester, (3-endo)-
115	165				452342-08-4	2932.99	(1R)-2-(benzylamino)-1-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)ethanol	(αR)-2,2-dimethyl-α-[[[phenylmethyl]amino]methyl]-4H-1,3-benzodioxin-6-methanol; 4H-1,3-Benzodioxin-6-methanol, 2,2-dimethyl-α-[[[phenylmethyl]amino]methyl]-, (αR)-
116	166				452339-73-0	2934.99	(5R)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	(5R)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-2-oxazolidinone; 2-Oxazolidinone, 5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-, (5R)-
117	167				85309-91-7	2909.49	2-[(2,6-dichlorobenzyl)oxy]ethanol	2-[[[(2,6-dichlorophenyl)methyl]oxy]ethanol]; 2-[(2,6-dichlorophenyl)methoxy]ethanol; Ethanol, 2-[(2,6-dichlorophenyl)methoxy]-
118	168				503070-57-3	2909.30	2-[[2-[(6-bromohexyl)oxy]ethoxy]methyl]-1,3-dichlorobenzene	2-[[[2-[(6-bromohexyl)oxy]ethyl]oxy]methyl]-1,3-dichlorobenzene; Benzene, 2-[[2-[(6-bromohexyl)oxy]ethoxy]methyl]-1,3-dichloro-
119	169				503068-36-8	2934.99	(5R)-3-[6-[2-[(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	(5R)-3-[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-2-oxazolidinone; (5R)-3-[6-[2-[[[2,6-dichlorophenyl)methyl]oxy]ethyl]oxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one; 2-Oxazolidinone, 3-[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-, (5R)-
120	171				503070-58-4	2922.50	triphenylacetic acid -- 4-[(1R)-2-[[6-[2-[(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]amino]-1-hydroxyethyl]-2-(hydroxymethyl)phenol (1:1)	4-[(R)-2-[[6-[2-(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]amino]-1-hydroxyethyl]-2-(hydroxymethyl)phenol triphenylacetate; α,α-diphenylbenzeneacetic acid -- (α1R)-α1-[[[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]amino]methyl]-4-hydroxy-1,3-benzenedimethanol (1:1); 1,3-Benzenedimethanol, α1-[[[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]amino]methyl]-4-hydroxy-, (α1R)-; Benzeneacetic acid, α,α-diphenyl- (1:1)

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121	172			388082-75-5	2934.99	5-[4-[[3-chloro-4-[(3-fluorophenyl)methoxy]phenyl]amino]-6-quinazoliny]-2-furancarboxaldehyde 4-methylbenzenesulfonate (1:1)	5-[4-[(3-chloro-4-[(3-fluorobenzyl)oxy]phenyl)amino]quinazolin-6-yl]furan-2-carbaldehyde 4-methylbenzenesulfonate; 5-[4-[(3-chloro-4-[(3-fluorophenyl)methyl]oxy]phenyl)amino]-6-quinazoliny]-2-furancarboxaldehyde 4-methylbenzenesulfonate salt; 2-Furancarboxaldehyde, 5-[4-[[3-chloro-4-[(3-fluorophenyl)methoxy]phenyl]amino]-6-quinazoliny]-, 4-methylbenzenesulfonate (1:1)
122	173			604-69-3	2940.00	1,2,3,4,6-penta-O-acetyl-β-D-glucopyranose	β-D-Glucopyranose, 1,2,3,4,6-pentaacetate
123	174			168619-25-8	2922.49	methyl 3'-aminobiphenyl-3-carboxylate	methyl 3'-amino-3-biphenylcarboxylate; methyl 3'-amino-[1,1'-biphenyl]-3-carboxylate; [1,1'-Biphenyl]-3-carboxylic acid, 3'-amino-, methyl ester
124	175			7355-58-0	2924.19	N-(2-chloroethyl)acetamide	Acetamide, N-(2-chloroethyl)-
125	176			451470-33-0	2933.29	methyl 3'-(2-methyl-4,5-dihydro-1H-imidazol-1-yl)biphenyl-3-carboxylate	methyl 3'-(2-methyl-4,5-dihydro-1H-imidazol-1-yl)-3-biphenylcarboxylate; [1,1'-Biphenyl]-3-carboxylic acid, 3'-(4,5-dihydro-2-methyl-1H-imidazol-1-yl)-, methyl ester
126	177			62600-71-9	2910.90	(2R)-2-(3-chlorophenyl)oxirane	Oxirane, 2-(3-chlorophenyl)-, (2R)-
127	180			21048-05-5	2930.90	N-methylbenzenecarbothiohydrazide	benzenecarbothioic acid, 1-methylhydrazide
128	181			860035-07-0	2930.90	1-[[[(methylsulfanyl)carbonyl]oxy]ethyl 2-methylpropanoate	1-[[[(methylthio)carbonyl]oxy]ethyl 2-methylpropanoate; Propanoic acid, 2-methyl-, 1-[[[(methylthio)carbonyl]oxy]ethyl ester
129	182			860035-10-5	[2928.00]	1-[[[(2,5-dioxopyrrolidin-1-yl)oxy]carbonyl]oxy]ethyl 2-methylpropanoate	1-[[[(2,5-dioxo-1-pyrrolidinyl)oxy]carbonyl]oxy]ethyl 2-methylpropanoate; Propanoic acid, 2-methyl-, 1-[[[(2,5-dioxo-1-pyrrolidinyl)oxy]carbonyl]oxy]ethyl ester
130	183			105812-81-5	2933.39	[(3S,4R)-4-(4-fluorophenyl)-1-methylpiperidin-3-yl]methanol	(-)-trans-4-(4'-fluorophenyl)-3-hydroxymethyl-N-methylpiperidine; (3S,4R)-4-(4-fluorophenyl)-1-methyl-3-piperidinemethanol; (3S,4R)-4-(4-Fluorophenyl)-3-hydroxymethyl-1-methylpiperidine; 3-Piperidinemethanol, 4-(4-fluorophenyl)-1-methyl-, (3S,4R)-
131	184			702687-42-1	2910.90	(2R)-2-[[5-bromo-2,3-difluorophenoxy]methyl]oxirane	(2R)-2-[[5-bromo-2,3-difluorophenyl]oxy]methyl]oxirane; Oxirane, 2-[[5-bromo-2,3-difluorophenoxy]methyl]-, (2R)-
132	185			702686-97-3	2922.19	ethyl 3-(3-[[[(2R)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]propanoate hydrochloride	3-(3-[[[(2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]propanoate hydrochloride; 3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropoxy]-4,5-difluorobenzene propanoate hydrochloride; ethyl 3-(3-[[[(2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]propanoate hydrochloride; Benzenepropanoic acid, 3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropoxy]-4,5-difluoro-, ethyl ester, hydrochloride (1:1)
133	187			7689-03-4	2939.99	(4S)-4-ethyl-4-hydroxy-1H-pyrano[3',4':6,7]indolizino[1,2-b]quinoline-3,14(4H,12H)-dione	camptothecin; 1H-Pyrano[3',4':6,7]indolizino[1,2-b]quinoline-3,14(4H,12H)-dione, 4-ethyl-4-hydroxy-, (4S)-
134	188			52602-39-8	2933.99	9H-carbazol-4-ol	
135	189			451487-18-6	2933.59	2-[[[(4-fluorobenzyl)sulfanyl]-1,5,6,7-tetrahydro-4H-cyclopenta[d]pyrimidin-4-one	2-[[[(4-fluorophenyl)methyl]thio]-1,5,6,7-tetrahydro-4H-cyclopenta[d]pyrimidin-4-one; 4H-Cyclopentapyrimidin-4-one, 2-[[[(4-fluorophenyl)methyl]thio]-1,5,6,7-tetrahydro-
136	190			356058-42-9	2933.59	{2-[[[(4-fluorobenzyl)sulfanyl]-4-oxo-4,5,6,7-tetrahydro-1H-cyclopenta[d]pyrimidin-1-yl]acetic acid	(2-[[[(4-fluorophenyl)methyl]thio]-4-oxo-4,5,6,7-tetrahydro-1H-cyclopenta[d]pyrimidin-1-yl]acetic acid; 1H-Cyclopentapyrimidine-1-acetic acid, 2-[[[(4-fluorophenyl)methyl]thio]-4,5,6,7-tetrahydro-4-oxo-
137	191			90035-34-0	2913.00	4'-(trifluoromethyl)biphenyl-4-carbaldehyde	4'-(trifluoromethyl)-4-biphenylcarbaldehyde; 4'-trifluoromethyl-1,1-biphenyl-4-carboxaldehyde; [1,1'-Biphenyl]-4-carboxaldehyde, 4'-(trifluoromethyl)-
138	192			89694-48-4	2931.00	(5-chloro-2-methoxyphenyl)boronic acid	[5-chloro-2-(methoxy)phenyl]boronic acid; Boronic acid, B-(5-chloro-2-methoxyphenyl)-
139	193			376592-58-4	2918.29	5'-chloro-2'-hydroxy-3'-nitrobiphenyl-3-carboxylic acid	5'-chloro-2'-hydroxy-3'-nitro-3-biphenylcarboxylic acid; 5'-chloro-2'-hydroxy-3'-nitro-1,1'-biphenyl-3-carboxylic acid; [1,1'-Biphenyl]-3-carboxylic acid, 5'-chloro-2'-hydroxy-3'-nitro-

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140	194		18048-64-1	2933.19	2-(3,4-dimethylphenyl)-5-methyl-2,4-dihydro-3H-pyrazol-3-one	3H-Pyrazol-3-one, 2-(3,4-dimethylphenyl)-2,4-dihydro-5-methyl-
141	196		444731-72-0	2933.99	2,3-dimethyl-2H-indazol-6-amine	2H-Indazol-6-amine, 2,3-dimethyl-
142	197		3934-20-1	2933.59	2,4-dichloropyrimidine	Pyrimidine, 2,4-dichloro-
143	198		444731-74-2	2933.59	N-(2-chloropyrimidin-4-yl)-2,3-dimethyl-2H-indazol-6-amine	N-(2-chloro-4-pyrimidinyl)-2,3-dimethyl-2H-indazol-6-amine; 2H-Indazol-6-amine, N-(2-chloro-4-pyrimidinyl)-2,3-dimethyl-
144	199		6973-09-7	2935.00	5-amino-2-methylbenzenesulfonamide	Benzenesulfonamide, 5-amino-2-methyl-
145	201		122321-04-4	2933.39	2-[methyl(pyridin-2-yl)amino]ethanol	2-[methyl(2-pyridinyl)amino]ethanol; Ethanol, 2-(methyl-2-pyridinylamino)-
146	202		291536-35-1	2934.10	(5Z)-5-[(4-fluorobenzylidene)-1,3-thiazolidine-2,4-dione	(5Z)-5-[(4-fluorophenyl)methylidene]-1,3-thiazolidine-2,4-dione; (5Z)-5-[(4-fluorophenyl)methylene]-2,4-thiazolidinedione; 2,4-Thiazolidinedione, 5-[(4-fluorophenyl)methylene]-, (5Z)-
147	203		136172-58-2	2932.99	1,6-di-O-acetyl-2-azido-3,4-di-O-benzyl-2-deoxy-D-glucopyranose	1,6-di-O-acetyl-2-azido-2-deoxy-3,4-bis-O-(phenylmethyl)-D-glucopyranose; D-Glucopyranose, 2-azido-2-deoxy-3,4-bis-O-(phenylmethyl)-, 1,6-diacetate
148	204		114869-97-5	2932.99	methyl 6-O-acetyl-4-O-(2-O-acetyl-3-O-benzyl-6-methyl- α -L-idopyranuronosyl)-3-O-benzyl-2-[[benzyloxy]carbonyl]amino]-2-deoxy- α -D-glucopyranoside	methyl 6-O-acetyl-4-O-[2-O-acetyl-6-methyl-3-O-(phenylmethyl)- α -L-idopyranuronosyl]-2-deoxy-3-O-(phenylmethyl)-2-[[[(phenylmethyl)oxy]carbonyl]amino]- α -D-glucopyranoside; α -D-Glucopyranoside, methyl 4-O-[2-O-acetyl-6-methyl-3-O-(phenylmethyl)- α -L-idopyranuronosyl]-2-deoxy-2-[[[(phenylmethoxy)carbonyl]amino]-3-O-(phenylmethyl)-, 6-acetate
149	205		99541-26-1	2932.99	methyl (2S,3S,4S,5S,6S)-6-[[[(1S,2S,3S,4R,5R)-3-(acetyloxy)-4-azido-6,8-dioxabicyclo[3.2.1]oct-2-yl]methyl]-4,5-bis(benzyloxy)-3-hydroxytetrahydro-2H-pyran-2-carboxylate	methyl (2S,3S,4S,5S,6S)-6-[[[(1S,2S,3S,4R,5R)-3-(acetyloxy)-4-azido-6,8-dioxabicyclo[3.2.1]oct-2-yl]methyl]-3-hydroxy-4,5-bis[(phenylmethyl)oxy]tetrahydro-2H-pyran-2-carboxylate; 1,6-anhydro-2-azido-2-deoxy-4-O-[6-methyl-2,3-bis-O-(phenylmethyl)- β -D-glucopyranuronosyl]- β -D-glucopyranose 3-acetate; β -D-Glucopyranose, 1,6-anhydro-2-azido-2-deoxy-4-O-[6-methyl-2,3-bis-O-(phenylmethyl)- β -D-glucopyranuronosyl]-, 3-acetate
150	206		99541-23-8	2932.99	(1R,2S,3R,4R,5R)-4-azido-2-[[[(4aR,6S,7R,8S,8aR)-7,8-bis(benzyloxy)-2-phenylhexahydroprano[3,2-d][1,3]dioxin-6-yl]oxy]-6,8-dioxabicyclo[3.2.1]oct-3-yl acetate	(1R,2S,3R,4R,5R)-4-azido-2-[[[(4aR,6S,7R,8S,8aR)-2-phenyl-7,8-bis[(phenylmethyl)oxy]hexahydroprano[3,2-d][1,3]dioxin-6-yl]oxy]-6,8-dioxabicyclo[3.2.1]oct-3-yl acetate; 1,6-anhydro-2-azido-4-O-[2,3-bis-O-(phenylmethyl)-4,6-O-(phenylmethylene)-beta-D-glucopyranosyl]-2-deoxy-beta-D-glucopyranose 3-acetate; β -D-Glucopyranose, 1,6-anhydro-2-azido-4-O-[2,3-bis-O-(phenylmethyl)-4,6-O-(phenylmethylene)- β -D-glucopyranosyl]-2-deoxy-, 3-acetate
166	270		579494-66-9	2924.29	propyl {4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxyphenyl}acetate	n-propyl [3-ethoxy-4-[(N,N-diethylcarbamido)methoxy]phenyl]acetate; propyl 4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxybenzeneacetate; [3-ethoxy-4-[(N,N-diethylcarbamido)methoxy]phenyl]acetic acid n-propyl ester; Benzeneacetic acid, 4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxy-, propyl ester
167	271		606143-52-6	2933.99	5-[(4-bromo-2-chlorophenyl)amino]-4-fluoro-N-(2-hydroxyethoxy)-1-methyl-1H-benzimidazole-6-carboxamide	1H-Benzimidazole-6-carboxamide, 5-[(4-bromo-2-chlorophenyl)amino]-4-fluoro-N-(2-hydroxyethoxy)-1-methyl-
168	272		691882-47-0	2933.39	4-hydroxybenzoic acid -- (2S,4E)-N-methyl-5-[5-(propan-2-yloxy)pyridin-3-yl]pent-4-en-2-amine (1:1)	4-hydroxybenzoic acid -- [(E)-(S)-4-(5-isopropoxy-pyridin-3-yl)-1-methylbut-3-enyl]methylamine (1:1); Benzoic acid, 4-hydroxy-, compd. with (2S,4E)-N-methyl-5-[5-(1-methylethoxy)-3-pyridinyl]-4-penten-2-amine (1:1)
169	273		548797-97-3	2933.39	N-(2-[[[(2S)-3-[[1-(4-chlorobenzyl)piperidin-4-yl]amino]-2-hydroxy-2-methylpropyl]oxy]-4-hydroxyphenyl]acetamide	N-[2-[[[(2S)-3-[[1-(4-chlorophenyl)methyl]-4-piperidinyl]amino]-2-hydroxy-2-methylpropyl]oxy]-4-hydroxyphenyl]acetamide; N-[2-[[[(2S)-3-[[1-(4-chlorobenzyl)piperidin-4-yl]amino]-2-hydroxy-2-methylpropyl]oxy]-4-hydroxyphenyl]acetamide
170	274		942436-93-3	2933.99	4-amino-8-(2,5-dimethoxyphenyl)-N-propylcinnoline-3-carboxamide	3-Cinnolinecarboxamide, 4-amino-8-(2,5-dimethoxyphenyl)-N-propyl-
171	275		942437-37-8	2933.99	4-amino-8-(2-fluoro-6-methoxyphenyl)-N-propylcinnoline-3-carboxamide	4-amino-8-(2-fluoro-6-methoxyphenyl)cinnoline-3-carboxylic acid propylamide; 3-Cinnolinecarboxamide, 4-amino-8-(2-fluoro-6-methoxyphenyl)-N-propyl-
172	276		51077-14-6	2933.99	(2S)-1-(tert-butoxycarbonyl)azetidine-2-carboxylic acid	1-tert-butyl ester (2S)-azetidine-1,2-dicarboxylic acid

173	277		631916-97-7	2933.99	(2S)-N-4-[(Z)-amino(methoxyimino)methyl]benzyl)-1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyethanoyl)azetidene-2-carboxamide benzenesulphonic acid (1:1)	(2S)-1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyacetyl)-N-[[4-[imino(methoxyamino)methyl]phenyl]methyl]-2-azetidene-carboxamide benzenesulfonate (1:1); 2-Azetidinecarboxamide, 1-[(2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyacetyl]-N-[[4-[imino(methoxyamino)methyl]phenyl]methyl]-, (2S)-, benzenesulfonate (1:1)
174	278		722543-31-9	2933.59	2-[ethyl[3-((4-[(5-(2-[(3-fluorophenyl)amino]-2-oxoethyl)-1H-pyrazol-3-yl)amino]quinazolin-7-yl)oxy)propyl]amino]ethyl dihydrogen phosphate	2-[[3-((4-[(5-(2-[(3-fluorophenyl)amino]-2-oxoethyl)-1H-pyrazol-3-yl)amino]quinazolin-7-yl)oxy)propyl)(ethyl)amino]ethyl dihydrogen phosphate; 5-[[7-[3-[ethyl[2-(phosphonoxy)ethyl]amino]propoxy]-4-quinazolinyl]amino]-N-(3-fluorophenyl)-1H-pyrazole-3-acetamide; 1H-Pyrazole-3-acetamide, 5-[[7-[3-[ethyl[2-(phosphonoxy)ethyl]amino]propoxy]-4-quinazolinyl]amino]-N-(3-fluorophenyl)-
175	280		893428-72-3	2934.99	N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methyl-1-piperazinyl)ethoxy]-5-[[tetrahydro-2H-pyran-4-yl]oxy]-4-quinazolinamine -- (2E)-2-butenedioate (1:2)	N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methylpiperazin-1-yl)ethoxy]-5-(tetrahydro-2H-pyran-4-yloxy)quinazolin-4-amine di[(2E)-but-2-enedioate]; N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methylpiperazin-1-yl)ethoxy]-5-(tetrahydro-2H-pyran-4-yloxy)quinazolin-4-amine difumarate; 4-Quinazolinamine, N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methyl-1-piperazinyl)ethoxy]-5-[[tetrahydro-2H-pyran-4-yl]oxy]-, (2E)-2-butenedioate (1:2)
176	281		941690-55-7	2935.00	3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]quinoline-4-carboxamide	3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]-4-quinolinecarboxamide; 4-Quinolinecarboxamide, 3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]-
177	282		220100-81-2	2934.99	(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine] (S,S)-2,3-dihydroxybutanedioate	(R)-spiro[1-azabicyclo[2.2.2]octane-3,2'(3'H)-furo[2,3-b]pyridine] D-tartrate
178	283		220099-91-2	2934.99	(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine]	(R)-spiro[1-azabicyclo[2.2.2]octane-3,2'(3'H)-furo[2,3-b]pyridine]
179	285		288385-88-6	2933.99	4-fluoro-2-methyl-1H-indol-5-ol	1H-Indol-5-ol, 4-fluoro-2-methyl-
180	286		376608-74-1	2934.99	2-[[[(3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylsulfanyl)pyrimidin-4-yl]amino]-2,2-dimethyltetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-yl]oxy]ethanol	2-[[[(3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylthio)pyrimidin-4-yl]amino]-2,2-dimethyltetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-yl]oxy]ethanol; Ethanol, 2-[[[(3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylthio)-4-pyrimidinyl]amino]tetrahydro-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]oxy]-
181	287		376608-71-8	2921.49	(1R,2S)-2-(3,4-difluorophenyl)cyclopropanaminium (2R)-hydroxy(phenyl)ethanoate	(1R,2S)-2-(3,4-difluorophenyl)cyclopropanaminium (2R)-hydroxy(phenyl)acetate; (aR)-(1R,2S)-a-hydroxybenzeneacetic acid -- 2-(3,4-difluorophenyl)cyclopropanamine (1:1); Benzeneacetic acid, a-hydroxy-, (aR)-(1R,2S)-compd. with 2-(3,4-difluorophenyl)cyclopropanamine (1:1)
182	288		179688-01-8	2933.59	7-(benzyloxy)-6-methoxyquinazolin-4(3H)-one	6-methoxy-7-(phenylmethoxy)-4(3H)-quinazolinone; 4(3H)-Quinazolinone, 6-methoxy-7-(phenylmethoxy)-
185	310		1028026-83-6	2933.19	5-methyl-1-(propan-2-yl)-4-[4-(propan-2-yloxy)benzyl]-1,2-dihydro-3H-pyrazol-3-one	5-methyl-1-(1-methylethyl)-4-[[4-[(1-methylethyl)oxy]phenyl]methyl]-1,2-dihydro-3H-pyrazol-3-one; 1,2-dihydro-5-methyl-4-[[4-(1-methylethoxy)phenyl]methyl]-1-(1-methylethyl)-3H-pyrazol-3-one; 3H-Pyrazol-3-one, 1,2-dihydro-5-methyl-4-[[4-(1-methylethoxy)phenyl]methyl]-1-(1-methylethyl)-
207	342		1034457-07-2	2921.49	2-(2,3-dihydro-1H-inden-2-yl)propan-2-amine hydrochloride	[1-(2,3-dihydro-1H-inden-2-yl)-1-methylethyl]amine hydrochloride; 2,3-dihydro-a,a-dimethyl-1H-indene-2-ethanamine hydrochloride; 1H-Indene-2-ethanamine, 2,3-dihydro-, a,a-, dimethyl-, hydrochloride (1:1);

208	343			1035455-90-3	2922.19	(2R)-1-(5-bromo-2,3-difluorophenoxy)-3- [[1-(2,3-dihydro-1H-inden-2-yl)-2- methylpropan-2- yl]amino]propan-2-ol hydrochloride	(2R)-1-(5-bromo-2,3-difluorophenoxy)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-propanol hydrochloride; (2R)-1-[[5-bromo-2,3-difluorophenyl]oxy]-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-propanol hydrochloride; 2-Propanol, 1-(5-bromo-2,3-difluorophenoxy)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-. Hydrochloride (1:1), (2R)-
209	344			1035455-87-8	2922.19	ethyl (2E)-3-{3-[[2(R)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]prop-2-enoate hydrochloride	ethyl (2E)-3-{3-[[2(R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]-2-propenoate hydrochloride; 2-Propenoic acid, 3-{3-[[2(R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]-4,5-difluorophenyl]-ethyl ester, hydrochloride (1:1). (2E)-
245	391			289042-10-0	2935.00	N-[5-[[diphenylphosphoryl]methyl]-4-(4-fluorophenyl)-6-(propan-2-yl)pyrimidin-2-yl]-N-methylmethanesulfonamide	N-[5-[[diphenylphosphoryl]methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)pyrimidin-2-yl]-N-methylmethanesulfonamide; N-[5-[[diphenylphosphinyl]methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)-2-pyrimidinyl]-N-methylmethanesulfonamide; Methanesulfonamide, N-[5-[[diphenylphosphinyl]methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)-2-pyrimidinyl]-N-methyl-
280	433			143785-86-8	2922.49	4-(1-aminocyclopropyl)-2,3,5-trifluorobenzoic acid	2,3,5-trifluorobenzoic acid, 4-(1-Aminocyclopropyl)-
281	434			143785-87-9	2924.29	4-[1-(acetylaminocyclopropyl)-2,3,5-trifluorobenzoic acid	4-(1-acetylaminocyclopropyl)-2,3,5-trifluorobenzoic acid; 2,3,5-trifluorobenzoic acid, 4-(1-Acetylaminocyclopropyl)-
301	518			150812-21-8	2921.51	N4-[(4-fluorophenyl)methyl]-2-nitro-1,4-benzenediamine	N4-(4-fluorobenzyl)-2-nitrobenzene-1,4-diamine; 1,4-Benzenediamine, N4-[(4-fluorophenyl)methyl]-2-nitro-
302	519			150812-23-0	2924.29	ethyl {4-[(4-fluorobenzyl)amino]-2-nitrophenyl}carbamate	ethyl (4-[[[(4-fluorophenyl)methyl]amino]-2-nitrophenyl]carbamate; Carbamic acid, [4-[[[(4-fluorophenyl)methyl]amino]-2-nitrophenyl]-, ethyl ester
323	547			68672-66-2	2934.10	(Z)-alpha-[[2-(1,1-dimethylethoxy)-1,1-dimethyl-2-oxoethoxy]imino]-2- [[triphenylmethyl]amino]-4-thiazoleacetic acid	
336	562			1137606-74-6	2933.99	6-fluoro-3-hydroxy-2-pyrazinecarbonitrile dicyclohexylamine	2-Pyrazinecarbonitrile, 6-fluoro-3,4-dihydro-3-oxo-, compd. with N-cyclohexylcyclohexanamine (1:1)
340	566			753015-42-8	2934.99	(R,E)-3-(2-(pyrrolidin-3-yl)vinyl)-5-tetrahydro-2H-pyran-4-yloxy]pyridine	
341	567			145783-14-8	2933.59	4,6-dichloro-5-nitro-2-propylthiopyrimidine	Pyrimidine, 4,6-dichloro-5-nitro-2-(propylthio)-
342	568			274693-53-7	2932.99	phenylmethyl N-[(3aS,4R,6S,6aR)-tetrahydro-6-hydroxy-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]-carbamate	Carbamic acid, N-[(3aS,4R,6S,6aR)-tetrahydro-6-hydroxy-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]-, phenylmethyl ester
343	569			56718-71-9	2909.50	4-(2-methoxyethyl)-phenol	p-(2-Methoxyethyl)phenol; p-Hydroxyphenethyl methyl ether; Phenol, p-(2-methoxyethyl)-

PROPRIETARY INFORMATION
SUBJECT TO PROTECTIVE ORDER
DELETED FROM BRACKETS []

PUBLIC VERSION

Attachment 2

CONFIDENTIAL

Attachment 2
 U.S. IMPORTS FOR CONSUMPTION
 Import Program: (K) Pharmaceuticals

Year	Customs Value of Entries Under K Program	Assumed highest possible MFN rate of 6.5%
2004	19,182,439,292	1,246,858,554
2005	18,755,445,614	1,219,103,965
2006	21,596,966,272	1,403,802,808
Avg. 2004-2006	19,844,950,393	1,289,921,776
2007 Update Impact		
2007	21,970,973,994	1,428,113,310
2008	23,390,949,661	1,520,411,728
2009	25,186,118,910	1,637,097,729
Avg. 2007-2009	23,516,014,188	1,528,540,922
Difference		
2004-2006 vs. 2007-2009	3,671,063,796	238,619,147
Duty Impact of 2007 Update†	238,619,147	
Products added in 2007 Update	1,289	
Annual Duty Saving Per Product of 2007 Update†	185,120	
Products to be added in Proposed 2011 Update	757	
Estimated Impact of Proposed 2011 Update	140,135,527	

†For years 2007-2009

Source: USITC Dataweb

Attachment 3

11 Dupont Circle, NW, Suite 500
Washington, DC 20036
Tel: 202 483-0070
Fax: 202 483-0092
www.barnesrichardson.com

April 9, 2010

Ms. Carmen Suro-Bredie
Chair, Trade Policy Staff Committee
Office of the U.S. Trade Representative
600 Seventeenth Street, N.W.
Washington, D.C. 20508

VIA: WWW.REGULATIONS.GOV

**Re: Pharmaceutical Appendix Update: Public Comments for Multilateral
Negotiations in the World Trade Organization on Expansion of the list of
Pharmaceutical Products Receiving Zero Duties**

Dear Ms. Suro-Bredie:

On behalf of the Pharmaceutical Research and Manufacturers of America ("PhRMA") and in accordance with the notice published in the Federal Register on March 12, 2010 (75 Fed. Reg. 11986), we hereby request that attached additional products be included on the list of pharmaceutical products being considered under the Multilateral Negotiations in the WTO on the Expansion of the List of Pharmaceutical Products Receiving Zero Duties.

ATTACHMENT 1: PhRMA recommends the inclusion of INN lists 100, 101, and 102, which were published in WHO Drug Information, Volume 22, Number 4 (2008), Volume 23, No. 2 (2009), and Volume 24, No.4 (2009) respectively. Copies of these lists, including all backup information may be found at:

<http://www.who.int/medicines/publications/druginformation/innlists/en/index.html>

Attached please find a list of the INNs on lists 100, 101, and 102 and their CAS numbers.

ATTACHMENT 2: PhRMA also requests that USTR revise the attached entries on its proposed intermediates list to include updated CAS numbers.

ATTACHMENT 3: In addition, PhRMA also hereby requests the intermediates listed in attachment 3 be added to Table 3 of the Pharmaceutical Appendix. In accordance with the instructions provided in the above-referenced Federal Register Notice, please find the requested information for the intermediates and the active ingredients. As also required, we hereby certify that:

- (1) to the best of our knowledge, these chemicals are sole-pharmaceutical-use; and
- (2) as shown in the attachments, all of the intermediates below are incorporated in the final active ingredient molecule;
- (3) the attached intermediates are used in producing active ingredients that have reached at least Phase III of clinical trials of the Food and Drug Administration (or other national equivalent).

Finally, PhRMA was involved in the development of the initial lists of proposed items for duty-free treatment which appear on USTR's website. PhRMA strongly supports these lists and urges USTR to negotiate duty-free treatment for all of the products listed thereon.

Please contact the undersigned if there are any questions in connection with this submission.

Sincerely,

/s/ Matthew T. McGrath /s/

Matthew T. McGrath
Counsel to PhRMA

ATTACHMENT 1

Proposed INN List # 100		
adarotene	496868-77-0	100
afamelanotide	75921-69-6	100
alisporivir	254435-95-5	100
amenamevir	841301-32-4	100
atigliflozin	647834-15-9	100
balapiravir	690270-29-2	100
beloranib	251111-30-5	100
blinatumomab	853426-35-4	100
canosimibe	768394-99-6	100
cixutumumab	947687-12-9	100
coleneuramide	204200-47-5	100
cositecan	203923-89-1	100
cutamesine	165377-43-5	100
davunetide	211439-12-2	100
delafloxacin	189279-58-1	100
dirucotide	152074-97-0	100
dutogliptin	852329-66-9	100
elotuzumab	915296-00-3	100
farletuzumab	896723-44-7	100
fidaxomicin	873857-62-6	100
figitumumab	943453-46-1	100
fosbretabulin	222030-63-9	100
fostamatinib	901119-35-5	100
indeglitazar	835619-41-5	100
ingenol mebutate	75567-37-2	100
laninamivir	203120-17-6	100
lesogaberan	344413-67-8	100
limiglidole	64644-54-8	100
lotilibcin	169148-84-9	100
macimorelin	381231-18-1	100
namitecan	372105-27-6	100
necitumumab	906805-06-9	100
oportuzumab monatox	945228-48-8	100
panobacumab	885053-97-4	100
pozanicline	161417-03-4	100
ramucirumab	947687-13-0	100
regorafenib	755037-03-7	100
riferminogene pecaplasmid	1001859-46-6	100
robatumumab	934235-44-6	100
racotumomab	946832-34-4	100
selumetinib	606143-52-6	100

serlopitant	860642-69-9	100
siltuximab	541502-14-1	100
sobetirome	211110-63-3	100
sofinicine	799279-80-4	100
solanezumab	955085-14-0	100
taberminogene vadenovec	943980-47-0	100
tarafenacin	385367-47-5	100
telcagepant	781649-09-0	100
tilivapram	166741-91-9	100
toceranib	356068-94-5	100
tozasertib	639089-54-6	100
vanutide cridificar	886584-10-7	100
vedolizumab	943609-66-3	100
voreloxin	175414-77-4	100
zicronapine	170381-16-5	100
Updates to previous lists		
Delete	Insert	List
cipamfylline	Cipamfyllinum	71
Netupitant	netupitantum	90
rabeximod	Rabeximodum	97
Tiprolisantum	Pitolisantum	98
Proposed INN List # 101		
acidum obeticholicum	459789-99-2	101
acidum tiomolibdicum	13818-85-4	101
Afacifenacinum	877606-63-8	101
afegostatium	169105-89-9	101
aganirsenum	1146887-67-3	101
albitiazolii bromidum	321915-72-4	101
arhalofenatum	24136-23-0	101
atalurenium	775304-57-9	101
atiratecanum	867063-97-6	101
bardoxolonum	218600-44-3	101
beclanorsenum	1072859-54-1	101
bixalomerum	851373-13-2	101
briakinumabum	339308-60-0	101
budiodaronum	335148-45-3	101
burapitantum	537034-22-3	101
danegaptidum	943134-39-2	101
daratumumabum #	945721-28-8	101
davalintidum #	863919-85-1	101
elinogrelum	936500-94-6	101
elisidepsinum	681272-30-0	101
elpetriginum	212778-82-0	101
enisamii iodidum	201349-37-3	101
eptacogum alfa pegolum (activatum)	944130-77-2	101

#		
etamicastatum	760173-05-5	101
evatanepagum	223488-57-1	101
fezakinumabum #	1007106-86-6	101
filibuvirum	877130-28-4	101
flutemetamolium (18F)	765922-62-1	101
fonturacetamum	77472-70-9	101
fresolimumabum #	948564-73-6	101
girentuximabum #	916138-87-9	101
gisadenafilum	334826-98-1	101
givinostatum	497833-27-9	101
golnerminogenum pradenovecum #	957472-14-9	101
gosogliptinum	869490-23-3	101
imagabalinum	610300-07-7	101
imetelstatum	868169-64-6	101
insulinum degludecum	844439-96-9	101
intetumumabum #	725735-28-4	101
iodum (124I) girentuximabum #	1011710-99-8	101
isopropylis tufofexoras	629664-81-9	101
lagociclovirum	92562-88-4	101
lebrikizumabum #	953400-68-5	101
lersivirinum	473921-12-9	101
levomequitazinum	88598-74-7	101
litronesibum	910634-41-2	101
lomitapidum	182431-12-5	101
losmapimodum	585543-15-3	101
miravirsenum	1072874-90-8	101
mocetinostatum	726169-73-9	101
modithromycinum	736992-12-4	101
naluzotanum	740873-06-7	101
nelotanserinum	839713-36-9	101
ocriplasminum	1048016-09-6	101
olodaterolum	868049-49-4	101
razupenemum	426253-04-5	101
rilotumumabum #	872514-65-3	101
rontalizumabum #	948570-30-7	101
semaglutidum	910463-68-2	101
serdemetanum	881202-45-5	101
setileutonum	910656-27-8	101
sifalimumabum #	1006877-41-3	101
sograzepidum	155488-25-8	101
sonedenosonum	131865-88-8	101
sothrombomodulinum alfa #	151638-93-6	101
tafamidisum	594839-88-0	101
taliglucerasum alfa #	37228-64-1	101

tanexabanum	365462-23-3	101
tecarfarinum	867257-26-9	101
teglarinadi chloridum	432037-57-5	101
teprotumumabum #	89957-37-9	101
tipapkinogenum sovacivecum #	1052105-48-2	101
torezolidum	856866-72-3	101
varfollitropinum alfa #	α subunit: 847420-37-5 β subunit: 847420-38-6	101
velusetragum	866933-46-2	101
zaurategrastum	455264-31-0	101
Updates to previous lists		
Delete	Insert	List
lenalidomide	lenalidomida	91
bromure d'azixomère	bromure d'azoximère	97
deforolimusum	Ridaforolimusum	98
afutuzumab	obinutuzumab	99
Proposed INN List # 102		
acidum zibrofusidicum	827603-95-2	102
afatinibum	850140-72-6	102
atagabalinum	223445-75-8	102
barasertibum	722543-31-9	102
benralizumabum #	1044511-01-4	102
cabiotraxetanum	451478-45-8	102
canagliflozinum	842133-18-0	102
carotegrastum	401904-75-4	102
condoliasum #	9024-13-9	102
dalotuzumabum #	1005389-60-5	102
danoprevirum	916881-67-9	102
derenofyllinum	251945-92-3	102
dilmapiomodum	444606-18-2	102
dinaciclibum	779353-01-4	102
dipraglurantum	872363-17-2	102
duvoglustatum	19130-96-2	102
emicerfontum	786701-13-1	102
florbetabenum (18F)	902143-01-5	102
foretinibum	849217-64-7	102
glembatumumabum #	1020264-78-1	102
guaraprololum	39421-75-5	102
intedanibum	656247-17-5	102
lasmiditanum	439239-90-4	102
latrepirdinum	3613-73-8	102
linifanibum	796967-16-3	102
lunacalcipolum	250384-82-8	102
mapracoratum	887375-26-0	102
marizomibum	437742-34-2	102

mavrilimumabum #	1085337-57-0	102
moxetumomabum pasudotoxum #	1020748-57-5	102
narlaprevirum	865466-24-6	102
omadacyclinum	389139-89-3	102
omecamtivum mecarbilum	873697-71-3	102
plinabulinum	714272-27-2	102
pridopidinum	346688-38-8	102
raseglurantum	757950-09-7	102
remimazolamum	308242-62-8	102
resminostatium	864814-88-0	102
revamilastum	893555-90-3	102
rintatolimodum	38640-92-5	102
secukinumabum #	875356-43-7 (H chain), 875356-44-8 (L chain)	102
selexipagum	475086-01-2	102
sotaterceptum #	1001080-50-7	102
suvizumabum #	914257-21-9	102
tafoxiparinum natricum	936084-30-9	102
tenifatecanum	850728-18-6	102
tideglusibum	865854-05-3	102
tivozanibum	475108-18-0	102
tonapofyllinum	340021-17-2	102
topiroxostatium	577778-58-6	102
tralokinumabum #	1044515-88-9	102
varlitinibum	845272-21-1	102
veliparibum	912444-00-9	102
verucerfontum	885220-61-1	102
volasertibum	755038-65-4	102
voncogum alfa #	109319-16-6	102
yttrium (90Y) clivatuzumabum	943976-23-6	102
tetraxetanum #		
zoleprodololum	158599-53-2	102
Updates to previous lists		
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inolitazonum	Efatutazonum	99

ATTACHMENT 2

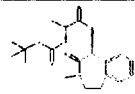
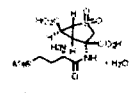
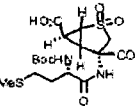
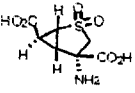
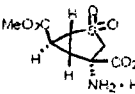
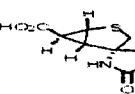
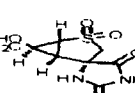
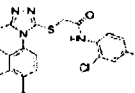
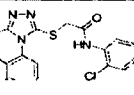
PhRMA requests that USTR revise the attached entries on its proposed intermediates list to include updated CAS numbers.


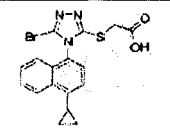
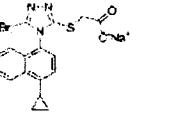
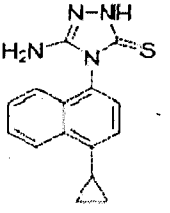

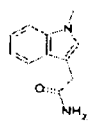
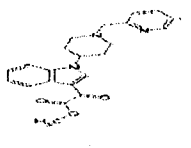

No.	ID	CASRN	HS code	Preferred name	Synonyms
252	398	848949-85-9	2922.49	4-fluoro-L-leucine -- ethyl hydrogen sulfate (1:1)	(S)-γ-fluoroleucine ethyl hydrogen sulfate; (S)-Gamma-Fluoroleucine Ethyl Ester Hydrogen Sulfate
254	400	1137917-12-4	2933.59	3-{{[6-(ethylsulfonyl)pyridin-3-yl]oxy}}-5- {{[(2S)-1-hydroxypropan-2-yl]oxy}}benzoic acid -- 1,4-diazabicyclo[2.2.2]octane (2:1)	3-(6-ethanesulfonylpyridin-3-yloxy)-5- ((S)-2-hydroxy-1-methylethoxy)benzoic acid hemi DABCO salt
256	402	1198178-65-2	2935.00	(1R,2R)-1-[(cyclopropylsulfonyl)carbamoyl]- 2-ethylcyclopropanaminium 4- methylbenzenesulfonate	(1R,2R)-1- {[(cyclopropylsulfonyl)amino]carbonyl}-2- ethylcyclopropanaminium 4- methylbenzenesulfonate

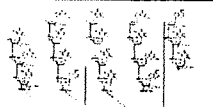
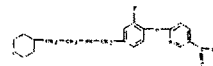
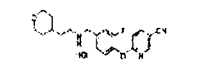
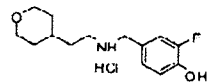
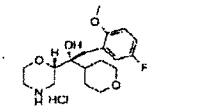
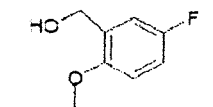
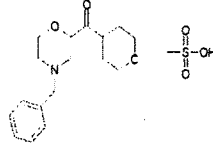
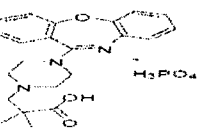
ATTACHMENT 3

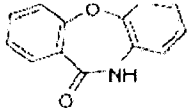
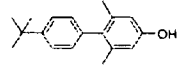
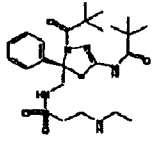
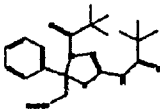
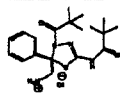
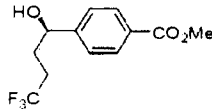
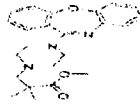
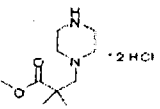
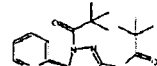
New Intermediates for Consideration

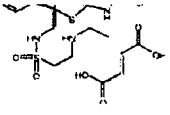
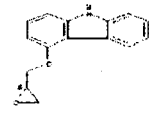
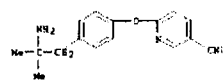
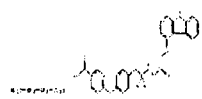
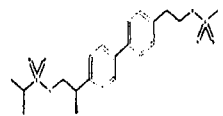
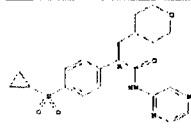
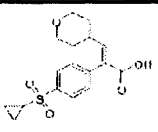
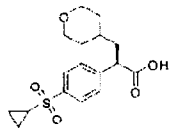

Additional intermediates to be included in the zero-for-zero update, in response to the US Trade Representative's invitation for comments, 75 Fed. Reg. 11,986 (March 12, 2010)

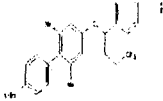
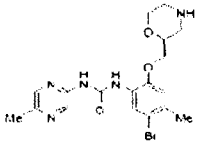
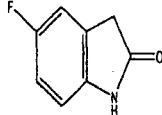
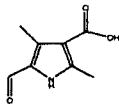
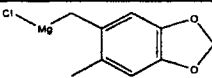
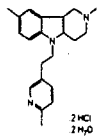
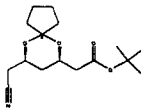
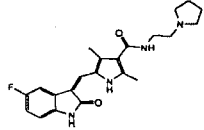
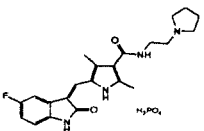
Submission #	Intercept ID #	Name Type	HS-Code	Description /Name	CAS-RN	Chemical Structure
1	589	CAS	2933.99	Carbamic acid, N-[(1S)-1-methyl-2-oxo-2-[[[(1S)-2,3,4,5-tetrahydro-3-methyl-2-oxo-1H-3-benzazepin-1-yl]amino]ethyl]-, 1,1-dimethylethyl ester	253324-93-5	
		IUPAC				
2	590	CAS	2934.99	2-Thiabicyclo[3.1.0]hexane-4,6-dicarboxylic acid, 4-[(2S)-2-amino-4-(methylthio)-1-oxobutyl]amino]-, 2,2-dioxide, hydrate (1:1), (1R,4S,5S,6S)-	956385-05-0	
		IUPAC				
3	591	CAS	2934.99	2-Thiabicyclo[3.1.0]hexane-4,6-dicarboxylic acid, 4-[(2S)-2-[[[(1,1-dimethylethoxy)carbonyl]amino]-4-(methylthio)-1-oxobutyl]amino]-, 2,2-dioxide, sodium salt (1:1), (1R,4S,5S,6S)-	635318-07-9	
		IUPAC				
4	592	CAS	2934.99	2-Thiabicyclo[3.1.0]hexane-4,6-dicarboxylic acid, 4-amino-, 2,2-dioxide, (1R,4S,5S,6S)-	635318-11-5	
		IUPAC				
5	593	CAS	2934.99	2-Thiabicyclo[3.1.0]hexane-4,6-dicarboxylic acid, 4-amino-, 4,6-dimethyl ester, 2,2-dioxide, (1R,4S,5S,6S)-	635317-62-3	
		IUPAC				
6	594	CAS	2934.99	Spiro[imidazolidine-4,4'-[2]thiabicyclo[3.1.0]hexane]-6'-carboxylic acid, 2,5-dioxo-, (1'R,4S,5'S,6'S)-	635702-67-9	
		IUPAC				
7	595	CAS	2934.99	Spiro[imidazolidine-4,4'-[2]thiabicyclo[3.1.0]hexane]-6'-carboxylic acid, 2,5-dioxo-, 2',2'-dioxide, (1'R,4S,5'S,6'S)-	635318-10-4	
		IUPAC				
8	596	CAS	2934.99	Benzoic acid, 4-[[2-[[[5-bromo-4-(4-cyclopropyl-1-naphthalenyl)-4H-1,2,4-triazol-3-yl]thio]acetyl]amino]-3-chloro-	878670-61-2	
		IUPAC				
9	597	CAS	2934.99	Benzoic acid, 4-[[2-[[[5-bromo-4-(4-cyclopropyl-1-naphthalenyl)-4H-1,2,4-triazol-3-yl]thio]acetyl]amino]-3-chloro-, potassium salt (1:1)	878670-63-4	

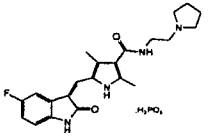
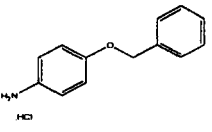
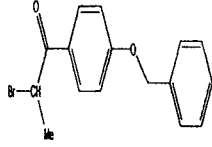
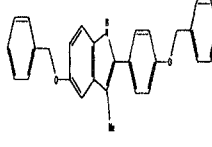
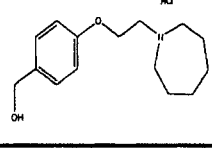
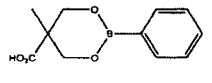
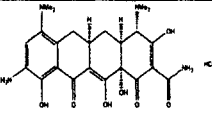
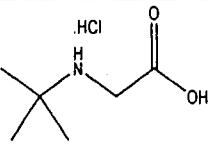
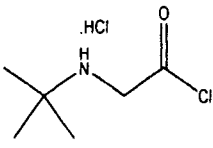
	IUPAC						OK
10	598 CAS	2934.99	Acetic acid, 2-[[5-bromo-4-(4-cyclopropyl-1-naphthalenyl)-4H-1,2,4-triazol-3-yl]thio]-		878672-00-5		
	IUPAC						
11	599 CAS	2934.99	Acetic acid, 2-[[5-bromo-4-(4-cyclopropyl-1-naphthalenyl)-4H-1,2,4-triazol-3-yl]thio]- Sodium Salt (1:1)		1151516-14-1		
	IUPAC						
12	600 CAS	2933.99	3H-1,2,4-Triazole-3-thione, 5-amino-4-(4-cyclopropyl-1-naphthalenyl)-2,4-dihydro-		878671-96-6		
	IUPAC						
13	601 CAS	2921.49	1-Naphthalenamine, 4-cyclopropyl-		878671-94-4		
	IUPAC						
14	602 CAS	2933.99	1H-Indole-3-acetamide, 1-methyl-		150114-41-3		
	IUPAC						
15	603 CAS	2933.39	1H-Indole-3-acetic acid, α -oxo-1-[1-(2-pyridinylmethyl)-4-piperidinyl]-, methyl ester		616898-64-7		
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16	604 CAS	2933.39	1H-Indole, 1-[1-(2-pyridinylmethyl)-4-piperidinyl]-		594827-31-3		
	IUPAC						

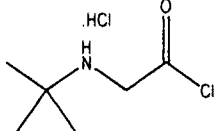
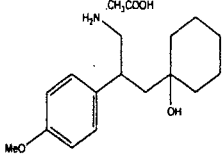
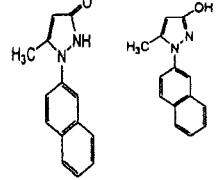
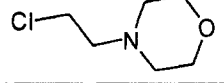
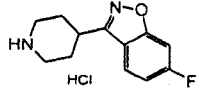
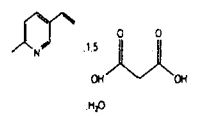
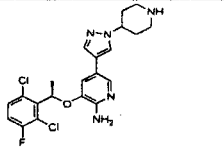
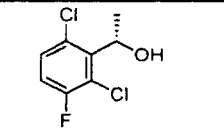
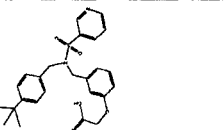
17	605	CAS	2934.99	DNA, d(P-thio) ([2'-O-(2-methoxyethyl)]m5rU - [2'-O-(2-methoxyethyl)]rG-[2'-O-(2-methoxyethyl)]m5rU - [2'-O-(2-methoxyethyl)]rGm5C-T-A-T-T-m5C-T-G-T-G- [2'-O-(2-methoxyethyl)]rA - [2'-O-(2-methoxyethyl)]rA - [2'-O-(2-methoxyethyl)]m5rU - [2'-O-(2-methoxyethyl)]m5rU), heptadecasodium salt	928768-71-2	
		IUPAC				
18	606	CAS	2934.99	3-Pyridinecarboxamide, 6-[2-fluoro-4-[[[2-(tetrahydro-2H-pyran-4-yl)ethyl]amino]methyl]phenoxy]-, hydrochloride (1:1)	1179819-25-0	
		IUPAC				
19	607	CAS	2933.99	3-Pyridinecarbonitrile, 6-[2-fluoro-4-[[[2-(tetrahydro-2H-pyran-4-yl)ethyl]amino]methyl]phenoxy]-, hydrochloride (1:1)	1197172-24-9	
		IUPAC		6-(2-fluoro-4-[[[2-(tetrahydro-2H-pyran-4-yl)ethylamino]methyl]phenoxy]nicotinonitrile hydrochloride		
20	608	CAS	2932.99	Phenol, 2-fluoro-4-[[[2-(tetrahydro-2H-pyran-4-yl)ethyl]amino]methyl]-hydrochloride (1:1)	1197172-19-2	
		IUPAC		2-Fluoro-4-((2-(tetrahydro-2H-pyran-4-yl)ethylamino)methyl)phenol hydrochloride		
21	609	CAS	2934.99	2-Morpholinemethanol, α-[(5-fluoro-2-methoxyphenyl)methyl]-α-(tetrahydro-2H-pyran-4-yl)-, hydrochloride (1:1), (αR,2S)-	1194374-05-4	
		IUPAC				
22	610	CAS	2909.49	Benzenemethanol, 5-fluoro-2-methoxy-	426831-32-5	
		IUPAC		(5-Fluoro-2-methoxyphenyl)methanol		
23	611	CAS	2934.99	Methanone, [(2S)-4-(phenylmethyl)-2-morpholinyl](tetrahydro-2Hpyran-4-yl)-, methanesulfonate (1:1)	1120335-14-9	
		IUPAC		(S)-(4-benzylmorpholin-2-yl)(tetrahydro-2H-pyran-4-yl)methanone methanesulfonate		
24	612	CAS	2934.99	1-Piperazinepropanoic acid, 4-dibenz[b,f][1,4]oxazepin-11-yl-α,α-dimethyl-, phosphate (1:1)	1097939-06-4	
		IUPAC				
25	613	CAS	2934.99	Dibenz[b,f][1,4]oxazepin-11(10H)-one	3158-85-8	

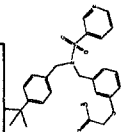
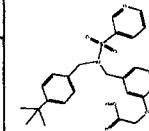
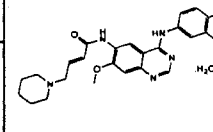
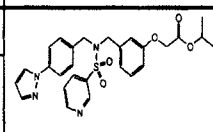
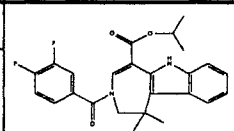
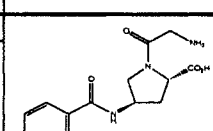
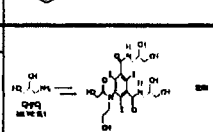
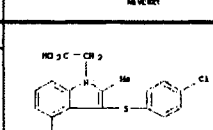
						
	IUPAC					
26	614	CAS	2907.19	[1,1'-Biphenyl]-4-ol, 4'-(1,1-dimethylethyl)-2,6-dimethyl-	906101-33-5	
	IUPAC					
27	615	CAS	2935.00	Propanamide, N-[(5S)-4-(2,2-dimethyl-1-oxopropyl)-5-[[[2-(ethylamino)ethyl]sulfonyl]amino]methyl]-4,5-dihydro-5-phenyl-1,3,4-thiadiazol-2-yl]-2,2-dimethyl-	910634-41-2	
	IUPAC			N-[4-(2,2-Dimethylpropionyl)-(5S)-5-[(2-ethylamino)ethanesulfonylamino]methyl]-5-phenyl-4,5-dihydro-[1,3,4]thiadiazol-2-yl]-2,2-dimethylpropanamide		
28	616	CAS	2934.99	Carbamic acid, N-[(2R)-3-(2,2-dimethyl-1-oxopropyl)-5-[(2,2-dimethyl-1-oxopropyl)amino]-2,3-dihydro-2-phenyl-1,3,4-thiadiazol-2-yl]methyl]-, 1,1-dimethylethyl ester	910634-47-8	
	IUPAC			Carbamic acid, [[[2R)-3-(2,2-dimethyl-1-oxopropyl)-5-[(2,2-dimethyl-1-oxopropyl)amino]-2,3-dihydro-2-phenyl-1,3,4-thiadiazol-2-yl]methyl]-, 1,1-dimethylethyl ester		
29	617	CAS	2934.99	Propanamide, N-[(5R)-5-(aminomethyl)-4-(2,2-dimethyl-1-oxopropyl)-4,5-dihydro-5-phenyl-1,3,4-thiadiazol-2-yl]-2,2-dimethyl-, monohydrochloride	910788-86-2	
	IUPAC			Propanamide, N-[(5R)-5-(aminomethyl)-4-(2,2-dimethyl-1-oxopropyl)-4,5-dihydro-5-phenyl-1,3,4-thiadiazol-2-yl]-2,2-dimethyl-, hydrochloride (1:1)		
30	618	CAS	2906.29	Benzoic acid, 4-[(1R)-4,4,4-trifluoro-1-hydroxybutyl]-, methyl ester	953422-94-1	
	IUPAC			(R)-4-(4,4,4-Trifluoro-1-hydroxybutyl)benzoic acid methyl ester		
31	619	CAS	2934.99	1-Piperazinepropanoic acid, 4-dibenz[b,f][1,4]oxazepin-11-yl- α , α -dimethyl-, methyl ester	1057253-63-0	
	IUPAC					
32	620	CAS	2933.59	1-Piperazinepropanoic acid, α , α -dimethyl-,methyl ester,hydrochloride (1:2)	1198178-56-1	
	IUPAC					
33	621	CAS	2935.00	Propanamide, N-[(5R)-4-(2,2-Dimethyl-1-oxopropyl)-5-[[[2-(ethylamino)ethyl]sulfonyl]amino]methyl]-4,5-dihydro-5-phenyl-1,3,4-thiadiazol-2-yl]-2,2-dimethyl-, (2Z)-2-butenedioate (1:1)	1198179-08-6	

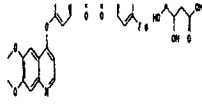
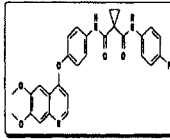
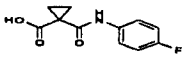
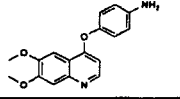
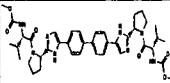
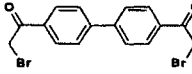
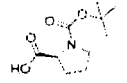
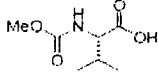
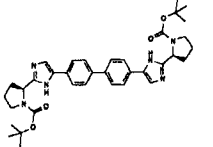
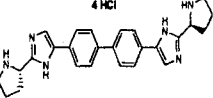
						
34	622	CAS	2934.99	9H-Carbazole, 4-[(2S)-2-oxiranylmethoxy]-	95093-95-1	
		IUPAC				
35	623	CAS	2933.39	3-Pyridinecarboxamide, 6-[4-[2-[[3-(9H-carbazol-4-yloxy)-2-hydroxypropyl]amino]-2-methylpropyl]phenoxy]-, (S)-;	189119-39-9	
		IUPAC				
36	624	CAS	2933.39	Butanedioic acid, compd. with 6-[4-[2-[[3-(9H-carbazol-4-yloxy)-2-hydroxypropyl]amino]-2-methylpropyl]phenoxy]-3-pyridinecarboxamide (1:2)	204593-36-2	
		IUPAC				
37	625	CAS	2935.00	2-Propanesulfonamide, N-[(2R)-2-[4'-[2-[(methylsulfonyl)amino]ethyl][1,1'-biphenyl]-4-yl]propyl]-	375345-95-2	
		IUPAC				
38	626	CAS	2934.99	2H-Pyran-4-propanamide, α-[4-(cyclopropylsulfonyl)phenyl]tetrahydro-N-2-pyrazinyl-, (αR)-	745051-65-4	
		IUPAC				
39	627	CAS	2932.99	Benzeneacetic acid, 4-(cyclopropylsulfonyl)-α-[(tetrahydro-2H-pyran-4-yl)methylene]-, (αE)-	745052-98-6	
		IUPAC				
40	628	CAS	2932.99	2H-Pyran-4-propanoic acid, α-[4-(cyclopropylsulfonyl)phenyl]tetrahydro-, (αR)-	745053-49-0	
		IUPAC				
41	629	CAS	2924.29	β-Alanine, N-[4-[1-[[4'-(1,1-dimethylethyl)-2,6-dimethyl[1,1'-biphenyl]-4-yl]oxy]-4,4,4-trifluorobutyl]benzoyl]-, (-)-	872260-20-3	

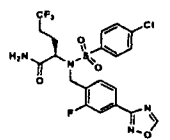
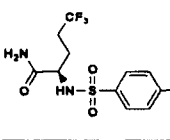
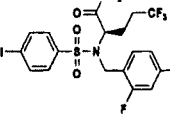
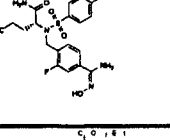
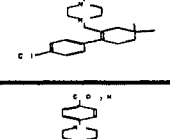
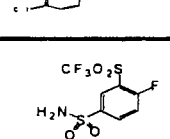
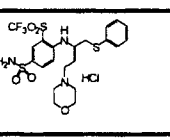
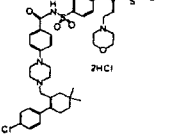
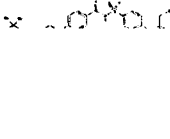

						
	IUPAC					
42	630	CAS	2934.99	N-[5-bromo-4-methyl-2-[(2S)-2-morpholinylmethoxy]phenyl]-N'-(5-methyl-2-pyrazinyl)-urea	911222-45-2	
	IUPAC					
43	631	CAS	2933.99	5-Fluoro-2-oxindole	56341-41-4	
	IUPAC					
44	632	CAS	2933.79	1H-Pyrrole-3-carboxylic acid, 5-formyl-2,4-dimethyl-	253870-02-9	
	IUPAC					
45	633	CAS	2932.99	Magnesium, chloro[(6-methyl-1,3-benzodioxol-5-yl)methyl]-	1008726-80-4	
	IUPAC					
46	634	CAS	2933.39	1H-Pyrido[4,3-b]indole, 2,3,4,5-tetrahydro-2,8-dimethyl-5-[2-(6-methyl-3-pyridinyl)ethyl]-, hydrochloride, hydrate (1:2:2)	1186653-04-2	
	IUPAC			Dimebon dihydrochloride dihydrate		
47	635	CAS	2932.99	6,10-Dioxaspiro[4.5]decane-7-acetic acid, 9-(cyanomethyl)-, 1,1-dimethylethyl ester, (7R,9R)-	1035204-82-0	
	IUPAC					
48	636	CAS	2933.99	1H-Pyrrole-3-carboxamide, 5-[(Z)-(5-fluoro-1,2-dihydro-2-oxo-3H-indol-3-ylidene)methyl]-2,4-dimethyl-N-[2-(1-pyrrolidinyl)ethyl]-	356068-94-5	
	IUPAC					
49	637	CAS	2933.99	1H-Pyrrole-3-carboxamide, 5-[(Z)-(5-fluoro-1,2-dihydro-2-oxo-3H-indol-3-ylidene)methyl]-2,4-dimethyl-N-[2-(1-pyrrolidinyl)ethyl]-, phosphate (1:1)	874819-74-6	

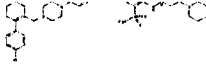
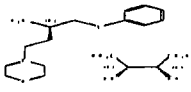
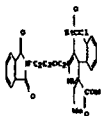
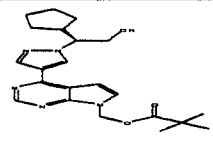
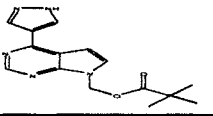

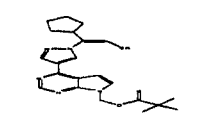
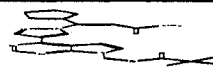
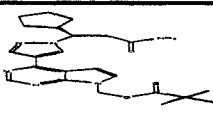
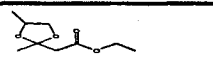
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50	638 CAS	2921.42	Benzenamine, 4-(phenylmethoxy)-, hydrochloride (1:1)	51388-20-6	
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51	639 CAS	2914.70	1-Propanone, 2-bromo-1-[4-(phenylmethoxy)phenyl]	35081-45-9	
	IUPAC				
52	640 CAS	2933.99	1H-Indole, 3-methyl-5-(phenylmethoxy)-2-[4-(phenylmethoxy)phenyl]-	198479-63-9	
	IUPAC				
53	641 CAS	2933.99	Benzenemethanol, 4-[2-(hexahydro-1H-azepin-1-yl)ethoxy]-, hydrochloride (1:1)	328933-65-9	
	IUPAC				
54	642 CAS	2931.00	1,3,2-Dioxaborinane-5-carboxylic acid, 5-methyl-2-phenyl-	839720-60-4	
	IUPAC				
55	643 CAS	2924.29	2-Naphthacenicarboxamide, 9-amino-4,7-bis(dimethylamino)-1,4,4a,5,5a,6,11,12a-octahydro-3,10,12,12a-tetrahydroxy-1,11-dioxo-monohydrochloride, (4S-(4α,4αα,5αα,12αα))	149934-21-4	
	IUPAC				
56	644 CAS	2922.50	2-(tert-butylamino)acetic acid hydrochloride	6939-23-7	
	IUPAC				
57	645 CAS	2922.50	2-(tert-butylamino)acetyl chloride hydrochloride	915725-52-9	
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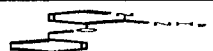

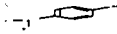
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58	646 CAS	2922.50	Cyclohexanol, 1-[2-amino-1-(4-methoxyphenyl)ethyl]-, acetate (1:1)	839705-03-2	
	IUPAC				
59	648 CAS	2933.19.90.90	3H-Pyrazol-3-one, 1,2-dihydro-5-methyl-1-(2-naphthalenyl)-	1192140-15-0	
	IUPAC		5-methyl-1-(naphthalen-2-yl)-1H-pyrazol-3-ol		
60	649 CAS	2934.99.90.90	Morpholine, 4-(2-chloroethyl)-	3240-94-6	
	IUPAC		1-Chloro-2-morpholinoethane		
61	651 CAS	2934.99.90.90	1,2-Benzisoxazole, 6-fluoro-3-(4-piperidiny)-, hydrochloride (1:1)	84163-13-3	
	IUPAC		6-fluoro-3-(piperidin-4-yl)benzo[d]isoxazole hydrochloride		
62	653 CAS	2933.39	Pyridine, 5-ethenyl-2-methyl-, ethanedioate, hydrate (2:3:2)	1202745-66-1	
	IUPAC				
63	654 CAS	2933.39	2-Pyridinamine, 3-[(1R)-1-(2,6-dichloro-3-fluorophenyl)ethoxy]-5-[1-(4-piperidiny)-1H-pyrazol-4-yl]-	877399-52-5	
	IUPAC				
64	655 CAS	2906.29	Benzenemethanol, 2,6-dichloro-3-fluoro- α -methyl-, (α S)-	877397-65-4	
	IUPAC				
65	656 CAS	2935.00	Acetic acid, 2-[3-[[[4-(1,1-dimethylethyl)phenyl]methyl](3-pyridinylsulfonyl)amino]methyl]phenoxy]-	223488-57-1	

						
66	657	CAS	2935.00	Acetic acid, 2-[3-[[[4-(1,1-dimethylethyl)phenyl]methyl](3-pyridinylsulfonyl)amino]methyl]phenoxy]-, sodium salt (1:1)	223490-49-1	
						
67	658	CAS	2933.59	2-Butenamide, N-[4-[(3-chloro-4-fluorophenyl)amino]-7-methoxy-6-quinazoliny]-4-(1-piperidyl)-, hydrate (1:1), (2E)-	1042385-75-0	
						
68	659	CAS	2935.00	Acetic acid, 2-[3-[[[4-(1H-pyrazol-1-yl)phenyl]methyl](3-pyridinylsulfonyl)amino]methyl]phenoxy]-, 1-methylethyl ester	1005549-94-9	
						
69	660	CAS	2933.99	Azepino[4,5-b]indole-5-carboxylic acid, 3-(3,4-difluorobenzoyl)-1,2,3,6-tetrahydro-1,1-dimethyl-, 1-methylethyl ester	629664-81-9	
						
70	661	CAS	2933.99	L-Proline, glycy-4-(benzoylamino)-, (4R)-	943134-39-2	
						
71	662	CAS	2922.19	3-Amino-1,2-Propane Diol	616-30-8	
						
72	663	CAS	2933.99	1H-Indole-1-acetic acid, 4-(acetylamino)-3-[(4-chlorophenyl)thio]-2-methyl-	802904-66-1	
						
43	664	CAS	2933.49	N-(4-((6,7-dimethoxy-4-quinolinyl)oxy)phenyl)-N'-(4-fluorophenyl)-1,1-cyclopropanedicarboxamide, L-malic acid salt (1:1)	1140909-48-3	

						
74	665	CAS	2933.49	N-[4-((6,7-dimethoxy-4-quinolinyl)oxy)phenyl]-N'-(4-fluorophenyl)-1,1-cyclopropanedicarboxamide	849217-68-1	
		IUPAC				
75	666	CAS	2924.29	1-((4-fluorophenyl)carbamoyl)cyclopropanecarboxylic acid	849217-48-7	
		IUPAC				
76	667	CAS	2933.49	4-((6,7-dimethoxy-4-quinolinyl)oxy)aniline	190728-25-7	
		IUPAC				
77	668	CAS	2933.29	methyl ((1S)-1-(((2S)-2-(4-(4'-(2-((2S)-1-((2S)-2-((methoxycarbonyl)amino)-3-methylbutanoyl)-2-pyrrolidinyl)-1H-imidazol-4-yl)-4-biphenyl)-1H-imidazol-2-yl)-1-pyrrolidinyl)carbonyl)-2-methylpropyl)carbamate, dihydrochloride	1009119-65-6	
		IUPAC				
78	669	CAS	2914.70	1,1'-(4,4'-biphenyldiyl)bis(2-bromoethanone)	4072-67-7	
		IUPAC				
79	670	CAS	2933.99	1-(tert-butoxycarbonyl)-L-proline	15761-39-4	
		IUPAC				
80	671	CAS	2924.19	N-(methoxycarbonyl)-L-valine	74761-42-5	
		IUPAC				
81	672	CAS	2933.29	tert-butyl (2S)-2-(4-(4'-(2-((2S)-1-(tert-butoxycarbonyl)-2-pyrrolidinyl)-1H-imidazol-5-yl)-4-biphenyl)-1H-imidazol-2-yl)-1-pyrrolidinecarboxylate	1007882-23-6	
		IUPAC				
82	673	CAS	2933.29	4,4'-(4,4'-biphenyldiyl)bis(2-((2S)-2-pyrrolidinyl)-1H-imidazole), hydrochloride (1:4)	1009119-83-8	
		IUPAC				

83	674	CAS	2935.00	(2R)-2-[[[(4-chlorophenyl)sulfonyl][[2-fluoro-4-(1,2,4-oxadiazol-3-yl)phenyl]methyl]amino]-5,5,5-trifluoropentanamide	1146699-66-2	
		IUPAC				
84	675	CAS	2935.00	R)-2-[[[(4-Chlorophenyl)sulfonyl]amino]-5,5,5-trifluoropentanamide	1146699-67-3	
		IUPAC				
85	677	CAS	2935.00	(2R)-2-[[[(4-chlorophenyl)sulfonyl][[(4-cyano-2-fluorophenyl)methyl]amino]-5,5,5-trifluoropentanamide	1146699-69-5	
		IUPAC				
86	678	CAS	2935.00	(2R)-2-[[[(4-chlorophenyl)sulfonyl][[2-fluoro-4-[(hydroxyamino)iminomethyl]phenyl]methyl]amino]-5,5,5-trifluoropentanamide	1146699-70-8	
		IUPAC				
87	679	CAS	2933.59	Benzoic acid, 4-[4-[[2-(4-chlorophenyl)-5,5-dimethyl-1-cyclohexen-1-yl]methyl]-1-piperazinyl]-, ethyl ester	1065604-70-7	
		IUPAC		ethyl 4-(4-[[2-(4-chlorophenyl)-5,5-dimethylcyclohex-1-en-1-yl]methyl]piperazin-1-yl)benzoate		
88	680	CAS	2933.59	Benzoic acid, 4-[4-[[2-(4-chlorophenyl)-5,5-dimethyl-1-cyclohexen-1-yl]methyl]-1-piperazinyl]-	1044598-91-5	
		IUPAC		4-(4-[[2-(4-chlorophenyl)-5,5-dimethylcyclohex-1-en-1-yl]methyl]piperazin-1-yl)benzoic acid		
89	681	CAS	2935.00	Benzenesulfonamide, 4-fluoro-3-[(trifluoromethyl)sulfonyl]-	1027345-08-9	
		IUPAC		4-fluoro-3-[(trifluoromethyl)sulfonyl]benzenesulfonamide		
91	682	CAS	2935.00	Benzenesulfonamide, 4-[[[(1R)-3-(4-morpholinyl)-1-[(phenylthio)methyl]propyl]amino]-3-[(trifluoromethyl)sulfonyl]-, hydrochloride (1:1)	1213227-71-4	
		IUPAC		4-[[[(2R)-4-(morpholin-4-yl)-1-(phenylsulfanyl)butan-2-yl]amino]-3-[(trifluoromethyl)sulfonyl]benzenesulfonamide hydrochloride		
92	683	CAS	2935.00	Benzamide, 4-[4-[[2-(4-chlorophenyl)-5,5-dimethyl-1-cyclohexen-1-yl]methyl]-1-piperazinyl]-N-[[4-[[[(1R)-3-(4-morpholinyl)-1-[(phenylthio)methyl]propyl]amino]-3-[(trifluoromethyl)sulfonyl]phenyl]sulfonyl]-, hydrochloride (1:2)	1093851-28-5	
		IUPAC		4-(4-[[2-(4-chlorophenyl)-5,5-dimethylcyclohex-1-en-1-yl]methyl]piperazin-1-yl)-N-[[4-[[[(2R)-4-(morpholin-4-yl)-1-(phenylsulfanyl)butan-2-yl]amino]-3-[(trifluoromethyl)sulfonyl]phenyl]sulfonyl]benzamide dihydrochloride		
93	684	CAS	2935.00	Benzamide, 4-[4-[[2-(4-chlorophenyl)-5,5-dimethyl-1-cyclohexen-1-yl]methyl]-1-piperazinyl]-N-[[4-[[[(1R)-3-(4-morpholinyl)-1-[(phenylthio)methyl]propyl]amino]-3-[(trifluoromethyl)sulfonyl]phenyl]sulfonyl]-	923564-51-6	

						
90	685	CAS	2934.99	4-Morpholinepropanamine, α -((phenylthio)methyl)-, (αR)-, (2R,3R)-2,3-dihydroxybutanedioate (1:1)	1211996-70-1	
		IUPAC		(2R)-4-(morpholin-4-yl)-1-(phenylsulfanyl)butan-2-amine 2,3-dihydroxybutanedioate (salt)		
99	686	CAS		Acetic acid, 2-(2-oxocyclopentylidene)-(E) with N-(1-methylethyl)-2-propanamine (1:1.)	1206547-75-2	
	686	IUPAC				
95	690	CAS	2933.39	3,5-Pyridinedicarboxylic acid, 4-(2-chlorophenyl)-2-[[2-(1,3-dihydro-1,3-dioxo-2H-isoindol-2-yl)ethoxy]methyl]-1,4-dihydro-6-methyl-, 3-ethyl 5-methyl ester	88150-62-3	
		IUPAC				
96	691	CAS	2933.59.70	Propanoic acid, 2,2-dimethyl-, [4-{1-[(1R)-2-cyano-1-cyclopentylethyl]-1H-pyrazol-4-yl}-7H-pyrrolo[2,3-d]pyrimidin-7-yl]methyl ester	1146629-80-2	
		IUPAC				
97	692	CAS	2933.59.70	Propanoic acid, 2,2-dimethyl-, [4-(1H-pyrazol-4-yl)-7H-pyrrolo[2,3-d]pyrimidin-7-yl]methyl ester	1146629-77-7	
		IUPAC				
98	693	CAS	2926.90.50	2-Propynenitrile, 3-cyclopentyl-	941685-68-3	
		IUPAC				
102	694	CAS	2933.59.70	(Z)-[4-(1-(2-cyano-1-cyclopentylvinyl)-1H-pyrazol-4-yl)-7H-pyrrolo[2,3-d]pyrimidin-7-yl]methyl pivalate		
		IUPAC				
103	695	CAS	2933.59.70	(Z)-[4-(1-(3-amino-1-cyclopentyl-3-oxoprop-1-enyl)-1H-pyrazol-4-yl)-7H-pyrrolo[2,3-d]pyrimidin-7-yl]methyl pivalate		
		IUPAC				
104	696	CAS	2933.59.70	(R)-[4-(1-(3-amino-1-cyclopentyl-3-oxopropyl)-1H-pyrazol-4-yl)-7H-pyrrolo[2,3-d]pyrimidin-7-yl]methyl pivalate		
		IUPAC				
106	650	CAS	2932.19.00.90	1,3-Dioxolane-2-acetic acid, 2,4-dimethyl-, ethyl ester	6290-17-1	

	IUPAC		2,4-Dimethyl-2-[(ethoxycarbonyl)methyl]-1,3-dioxolane			
107	652	CAS	2933.39.99.90	2-Pyridinamine, 3-(phenylmethoxy)-	24016-03-3	
		IUPAC		3-(benzyloxy)pyridin-2-amine		
108	676	CAS	2926.90	4-(bromomethyl)-3-fluorobenzonitrile	105942-09-4	
		IUPAC				
100	687	CAS			748810-28-8	
				(3R)-1-[(1R,2R)-2-[2-(3,4-dimethoxyphenyl)ethoxy]cyclohexyl]pyrrolidin-3-ol hydrochloride		
	687	IUPAC				
101	688	CAS				
		IUPAC		3R,6S)-3-amino-6-(2,3-difluorophenyl)hexahydro-1-(2,2,2-trifluoroethyl)-2H-azepin-2-one hydrochloride, compd. with 2-methoxy-2-methylpropane (1:1:1)		
94	689	CAS	2916.39	Benzeneacetic acid, α -methyl-4-(2-methylpropyl)-	15687-27-1	
		IUPAC	INN	Ibuprofen		

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CPI 10-292
The Honorable Marilyn R. Abbott
Secretary to the Commission
United States International Trade Commission
500 E. Street, S.W.
Washington, DC 20436

Business Proprietary Information
Deleted in Brackets [] at
Attachment 1

PUBLIC VERSION

Re: Inv. No. 332-TA-520; Advice Concerning the Addition of Certain Pharmaceutical Products and Chemical Intermediates to the Pharmaceutical Appendix of the HTS

Dear Secretary Abbott:

On behalf of the Pharmaceutical Research and Manufacturers of America ("PhRMA") we hereby amend Attachment 1 to our July 14, 2010 comments concerning the above referenced investigation. Due to a calculation error, the initial submission misrepresented the 2010 estimated value of imports for certain products. Please refer to Attachment 1 to this submission for the corrected values. We sincerely regret any confusion this may have caused.

Confidential Treatment is requested for certain bracketed, business proprietary information contained in this submission in accordance with 19 C.F.R. Part 201, for the following reason: Attachment 1 contains information concerning the value of imports and exports by specific companies, revealing the operations of these individual companies. Disclosure of the foregoing confidential information would likely either impair the Commission's ability to obtain information necessary to perform its functions, or would cause

substantial harm to the competitive position of the submitting companies. A certification that substantially identical information is not otherwise available to the public is attached hereto.

Please contact the undersigned should you have any questions.

Respectfully submitted,



Matthew T. McGrath
BARNES, RICHARDSON & COLBURN
Counsel to PhRMA

Attachment 1

Attachment 1

Estimated 2010 Import & Export Values

Table 3: Proposed Chemical Intermediates

No.	ID	Submitter	Estimated 2010 Import Value	Estimated 2010 Export Value	CASRN	HS code	Preferred name	Synonyms
19	36				20059-73-8	2922.29	2-[4-(aminomethyl)phenoxy]-N,N-dimethylethanamine	4-[2-(dimethylamino)ethoxy]benzylamine; 4-[2-(dimethylamino)ethoxy]benzenemethanamine; p-[2-(dimethylamino)ethoxy]benzylamine; 2-[4-(aminomethyl)phenoxy]-N,N-dimethyl-ethanamine; Benzenemethanamine, 4-[2-(dimethylamino)ethoxy]-
111	160				414909-98-1	2933.39	benzyl 2-(4-fluoro-2-methylphenyl)-4-oxo-3,4-dihydropyridine-1(2H)-carboxylate	phenylmethyl 2-(4-fluoro-2-methylphenyl)-4-oxo-3,4-dihydro-1(2H)-pyridinecarboxylate; 1(2H)-Pyridinecarboxylic acid, 2-(4-fluoro-2-methylphenyl)-3,4-dihydro-4-oxo-, phenylmethyl ester
112	161				334477-60-0	2921.49	(1R)-1-[3,5-bis(trifluoromethyl)phenyl]-N-methylethanamine	(αR)-N,α-dimethyl-3,5-bis(trifluoromethyl)benzenemethanamine; Benzenemethanamine, N,α-dimethyl-3,5-bis(trifluoromethyl)-, (αR)-
113	162				414910-13-7	2933.39	(2S)-hydroxy(phenyl)ethanoic acid -- (2R)-2-(4-fluoro-2-methylphenyl)piperidin-4-one (1:1)	(R)-2-(4-fluoro-2-methylphenyl)-4-piperidinone (S)-α-hydroxybenzeneacetic acid salt (1:1); (2R)-2-(4-fluoro-2-methylphenyl)-4-piperidinone (αS)-α-hydroxybenzeneacetic acid (1:1)
114	164				56880-11-6	2933.39	ethyl [(3-endo)-8-methyl-8-azabicyclo[3.2.1]oct-3-yl]acetate	Ethyl (8-methyl-8-azabicyclo[3.2.1]oct-3-yl)acetate; 8-Azabicyclo[3.2.1]octane-3-acetic acid, 8-methyl-, ethyl ester, (3-endo)-
C44 115	165				452342-08-4	2932.99	(1R)-2-(benzylamino)-1-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)ethanoic acid	(αR)-2,2-dimethyl-α-[[[(phenylmethyl)amino]methyl]-4H-1,3-benzodioxin-6-methanol]; 4H-1,3-Benzodioxin-6-methanol, 2,2-dimethyl-α-[[[(phenylmethyl)amino]methyl]-, (αR)-
116	166				452339-73-0	2934.99	(5R)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	(5R)-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-2-oxazolidinone; 2-Oxazolidinone, 5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-, (5R)-
117	167				85309-91-7	2909.49	2-[(2,6-dichlorobenzyl)oxy]ethanol	2-[[[(2,6-dichlorophenyl)methyl]oxy]ethanol]; 2-[(2,6-dichlorophenyl)methoxy]ethanol; Ethanol, 2-[(2,6-dichlorophenyl)methoxy]-
118	168				503070-57-3	2909.30	2-[[[(2-bromohexyl)oxy]ethoxy]methyl]-1,3-dichlorobenzene	2-[[[(2-bromohexyl)oxy]ethyl]oxy]methyl]-1,3-dichlorobenzene; Benzene, 2-[[[(2-bromohexyl)oxy]ethoxy]methyl]-1,3-dichloro-
119	169				503068-36-8	2934.99	(5R)-3-[6-[2-[(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one	(5R)-3-[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-2-oxazolidinone; (5R)-3-[6-[[2-[[[(2,6-dichlorophenyl)methyl]oxy]ethyl]oxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-1,3-oxazolidin-2-one]; 2-Oxazolidinone, 3-[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]-5-(2,2-dimethyl-4H-1,3-benzodioxin-6-yl)-, (5R)-
120	171				503070-58-4	2922.50	triphenylacetic acid -- 4-[(1R)-2-[[6-[2-(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]amino]-1-hydroxyethyl]-2-(hydroxymethyl)phenol (1:1)	4-[[[(R)-2-[[6-[2-(2,6-dichlorobenzyl)oxy]ethoxy]hexyl]amino]-1-hydroxyethyl]-2-(hydroxymethyl)phenol triphenylacetate]; α,α-diphenylbenzeneacetic acid -- (α1R)-α1-[[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]amino]methyl]-4-hydroxy-1,3-benzenedimethanol (1:1); 1,3-Benzenedimethanol, α1-[[6-[2-[(2,6-dichlorophenyl)methoxy]ethoxy]hexyl]amino]methyl]-4-hydroxy-, (α1R)-; Benzeneacetic acid, α,α-diphenyl-, (1:1)

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121	172			388082-75-5	2934.99	5-[4-[[3-chloro-4-[(3-fluorophenyl)methoxy]phenyl]amino]-6-quinazoliny]-2-furancarboxaldehyde 4-methylbenzenesulfonate (1:1)	5-[4-((3-chloro-4-[(3-fluorobenzyl)oxy]phenyl)amino)quinazolin-6-yl]furan-2-carbaldehyde 4-methylbenzenesulfonate; 5-[4-((3-chloro-4-((3-fluorophenyl)methyl)oxy)phenyl)amino]-6-quinazoliny]-2-furancarboxaldehyde 4-methylbenzenesulfonate salt; 2-Furancarboxaldehyde, 5-[4-[[3-chloro-4-[(3-fluorophenyl)methoxy]phenyl]amino]-6-quinazoliny]-, 4-methylbenzenesulfonate (1:1)
122	173			604-69-3	2940.00	1,2,3,4,6-penta-O-acetyl-β-D-glucopyranose	β-D-Glucopyranose, 1,2,3,4,6-pentaacetate
123	174			168619-25-8	2922.49	methyl 3'-aminobiphenyl-3-carboxylate	methyl 3'-amino-3-biphenylcarboxylate; methyl 3'-amino-[1,1'-biphenyl]-3-carboxylate; [1,1'-Biphenyl]-3-carboxylic acid, 3'-amino-, methyl ester
124	175			7355-58-0	2924.19	N-(2-chloroethyl)acetamide	Acetamida, N-(2-chloroethyl)-
125	176			451470-33-0	2933.29	methyl 3'-(2-methyl-4,5-dihydro-1H-imidazol-1-yl)biphenyl-3-carboxylate	methyl 3'-(2-methyl-4,5-dihydro-1H-imidazol-1-yl)-3-biphenylcarboxylate; [1,1'-Biphenyl]-3-carboxylic acid, 3'-(4,5-dihydro-2-methyl-1H-imidazol-1-yl)-, methyl ester
126	177			62600-71-9	2910.90	(2R)-2-(3-chlorophenyl)oxirane	Oxirane, 2-(3-chlorophenyl)-, (2R)-
127	180			21048-05-5	2930.90	N-methylbenzenecarbothiohydrazide	benzenecarbothioic acid, 1-methylhydrazide
128	181			860035-07-0	2930.90	1-((methylsulfanyl)carbonyl)oxyethyl 2-methylpropanoate	1-((methylthio)carbonyl)oxyethyl 2-methylpropanoate; Propanoic acid, 2-methyl-, 1-((methylthio)carbonyl)oxyethyl ester
129	182			860035-10-5	[2928.00]	1-(((2,5-dioxopyrrolidin-1-yl)oxy)carbonyl)oxyethyl 2-methylpropanoate	1-(((2,5-dioxo-1-pyrrolidinyl)oxy)carbonyl)oxyethyl 2-methylpropanoate; Propanoic acid, 2-methyl-, 1-(((2,5-dioxo-1-pyrrolidinyl)oxy)carbonyl)oxyethyl ester
130	183			105812-81-5	2933.39	[(3S,4R)-4-(4-fluorophenyl)-1-methylpiperidin-3-yl]methanol	(-)-trans-4-(4'-fluorophenyl)-3-hydroxymethyl-N-methylpiperidine; (3S,4R)-4-(4-fluorophenyl)-1-methyl-3-piperidinemethanol; (3S,4R)-4-(4-Fluorophenyl)-3-hydroxymethyl-1-methylpiperidine; 3-Piperidinemethanol, 4-(4-fluorophenyl)-1-methyl-, (3S,4R)-
131	184			702687-42-1	2910.90	(2R)-2-[[5-bromo-2,3-difluorophenoxy)methyl]oxirane	(2R)-2-[[5-bromo-2,3-difluorophenyl]oxy]methyl]oxirane; Oxirane, 2-[[5-bromo-2,3-difluorophenoxy)methyl]-, (2R)-
132	185			702686-97-3	2922.19	ethyl 3-{3-[[2R)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy}-4,5-difluorophenyl}propanoate hydrochloride	3-{3-[[2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy}-4,5-difluorophenyl}propanoate hydrochloride; 3-[[2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropoxy]-4,5-difluorobenzene]propanoate hydrochloride; ethyl 3-{3-[[2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy}-4,5-difluorophenyl}propanoate hydrochloride; Benzenepropanoic acid, 3-[[2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropoxy]-4,5-difluoro-, ethyl ester, hydrochloride (1:1)
133	187			7689-03-4	2939.99	(4S)-4-ethyl-4-hydroxy-1H-pyrano[3',4':6,7]indolizino[1,2-b]quinoline-3,14(4H,12H)-dione	camptothecin; 1H-Pyrano[3',4':6,7]indolizino[1,2-b]quinoline-3,14(4H,12H)-dione, 4-ethyl-4-hydroxy-, (4S)-
134	188			52602-39-8	2933.99	9H-carbazol-4-ol	
135	189			451487-18-6	2933.59	2-[[4-(4-fluorobenzyl)sulfanyl]-1,5,6,7-tetrahydro-4H-cyclopenta[d]pyrimidin-4-one	2-[[4-(4-fluorophenyl)methyl]thio]-1,5,6,7-tetrahydro-4H-cyclopenta[d]pyrimidin-4-one; 4H-Cyclopentapyrimidin-4-one, 2-[[4-(4-fluorophenyl)methyl]thio]-1,5,6,7-tetrahydro-
136	190			356058-42-9	2933.59	{2-[[4-(4-fluorobenzyl)sulfanyl]-4-oxo-4,5,6,7-tetrahydro-1H-cyclopenta[d]pyrimidin-1-yl]acetic acid	(2-[[4-(4-fluorophenyl)methyl]thio]-4-oxo-4,5,6,7-tetrahydro-1H-cyclopenta[d]pyrimidin-1-yl)acetic acid; 1H-Cyclopentapyrimidine-1-acetic acid, 2-[[4-(4-fluorophenyl)methyl]thio]-4,5,6,7-tetrahydro-4-oxo-
137	191			90035-34-0	2913.00	4'-(trifluoromethyl)biphenyl-4-carbaldehyde	4'-(trifluoromethyl)-4-biphenylcarbaldehyde; 4'-(trifluoromethyl)-1,1-biphenyl-4-carboxaldehyde; [1,1'-Biphenyl]-4-carboxaldehyde, 4'-(trifluoromethyl)-
138	192			89694-48-4	2931.00	(5-chloro-2-methoxyphenyl)boronic acid	[5-chloro-2-(methoxy)phenyl]boronic acid; Boronic acid, B-(5-chloro-2-methoxyphenyl)-
139	193			376592-58-4	2918.29	5'-chloro-2'-hydroxy-3'-nitrobiphenyl-3-carboxylic acid	5'-chloro-2'-hydroxy-3'-nitro-3-biphenylcarboxylic acid; 5'-chloro-2'-hydroxy-3'-nitro-1,1'-biphenyl-3-carboxylic acid; [1,1'-Biphenyl]-3-carboxylic acid, 5'-chloro-2'-hydroxy-3'-nitro-

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140	194		18048-64-1	2933.19	2-(3,4-dimethylphenyl)-5-methyl-2,4-dihydro-3H-pyrazol-3-one	3H-Pyrazol-3-one, 2-(3,4-dimethylphenyl)-2,4-dihydro-5-methyl-
141	196		444731-72-0	2933.99	2,3-dimethyl-2H-indazol-6-amine	2H-Indazol-6-amine, 2,3-dimethyl-
142	197		3934-20-1	2933.59	2,4-dichloropyrimidine	Pyrimidine, 2,4-dichloro-
143	198		444731-74-2	2933.59	N-(2-chloropyrimidin-4-yl)-2,3-dimethyl-2H-indazol-6-amine	N-(2-chloro-4-pyrimidinyl)-2,3-dimethyl-2H-indazol-6-amine, N-(2-chloro-4-pyrimidinyl)-2,3-dimethyl-
144	199		6973-09-7	2935.00	5-amino-2-methylbenzenesulfonamide	Benzenesulfonamide, 5-amino-2-methyl-
145	201		122321-04-4	2933.39	2-[methyl(pyridin-2-yl)amino]ethanol	2-[methyl(2-pyridinyl)amino]ethanol; Ethanol, 2-(methyl-2-pyridinylamino)-
146	202		291536-35-1	2934.10	(5Z)-5-[(4-fluorobenzylidene)-1,3-thiazolidine-2,4-dione	(5Z)-5-[(4-fluorophenyl)methylidene]-1,3-thiazolidine-2,4-dione; (5Z)-5-[(4-fluorophenyl)methylene]-2,4-thiazolidinedione; 2,4-Thiazolidinedione, 5-[(4-fluorophenyl)methylene]-, (5Z)-
147	203		136172-58-2	2932.99	1,6-di-O-acetyl-2-azido-3,4-di-O-benzyl-2-deoxy-D-glucopyranose	1,6-di-O-acetyl-2-azido-2-deoxy-3,4-bis-O-(phenylmethyl)-D-glucopyranose; D-Glucopyranose, 2-azido-2-deoxy-3,4-bis-O-(phenylmethyl)-, 1,6-diacetate
148	204		114869-97-5	2932.99	methyl 6-O-acetyl-4-O-(2-O-acetyl-3-O-benzyl-6-methyl- α -L-idopyranuronosyl)-3-O-benzyl-2-[[benzyloxy]carbonyl]amino]-2-deoxy- α -D-glucopyranoside	methyl 6-O-acetyl-4-O-[2-O-acetyl-6-methyl-3-O-(phenylmethyl)- α -L-idopyranuronosyl]-2-deoxy-3-O-(phenylmethyl)-2-[[[(phenylmethyl)oxy]carbonyl]amino]- α -D-glucopyranoside; α -D-Glucopyranoside, methyl 4-O-[2-O-acetyl-6-methyl-3-O-(phenylmethyl)- α -L-idopyranuronosyl]-2-deoxy-2-[[[(phenylmethoxy)carbonyl]amino]-3-O-(phenylmethyl)-6-acetate
149	205		99541-26-1	2932.99	methyl (2S,3S,4S,5S,6S)-6-[[[(1S,2S,3S,4R,5R)-3-(acetyloxy)-4-azido-6,8-dioxabicyclo[3.2.1]oct-2-yl]methyl]-4,5-bis(benzyloxy)-3-hydroxytetrahydro-2H-pyran-2-carboxylate	methyl (2S,3S,4S,5S,6S)-6-[[[(1S,2S,3S,4R,5R)-3-(acetyloxy)-4-azido-6,8-dioxabicyclo[3.2.1]oct-2-yl]methyl]-3-hydroxy-4,5-bis[(phenylmethyl)oxy]tetrahydro-2H-pyran-2-carboxylate; 1,6-anhydro-2-azido-2-deoxy-4-O-[6-methyl-2,3-bis-O-(phenylmethyl)- β -D-glucopyranuronosyl]- β -D-glucopyranose 3-acetate; β -D-Glucopyranose, 1,6-anhydro-2-azido-2-deoxy-4-O-[6-methyl-2,3-bis-O-(phenylmethyl)- β -D-glucopyranuronosyl]-, 3-acetate
150	206		99541-23-8	2932.99	(1R,2S,3R,4R,5R)-4-azido-2-[[[(4aR,6S,7R,8S,8aR)-7,8-bis(benzyloxy)-2-phenylhexahydropyrano[3,2-d][1,3]dioxin-6-yl]oxy]-6,8-dioxabicyclo[3.2.1]oct-3-yl acetate	(1R,2S,3R,4R,5R)-4-azido-2-[[[(4aR,6S,7R,8S,8aR)-2-phenyl-7,8-bis[(phenylmethyl)oxy]hexahydropyrano[3,2-d][1,3]dioxin-6-yl]oxy]-6,8-dioxabicyclo[3.2.1]oct-3-yl acetate; 1,6-anhydro-2-azido-4-O-[2,3-bis-O-(phenylmethyl)-4,6-O-(phenylmethylene)-beta-D-glucopyranosyl]-2-deoxy-beta-D-glucopyranose 3-acetate; β -D-Glucopyranose, 1,6-anhydro-2-azido-4-O-[2,3-bis-O-(phenylmethyl)-4,6-O-(phenylmethylene)- β -D-glucopyranosyl]-2-deoxy-, 3-acetate
166	270		579494-66-9	2924.29	propyl 4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxyphenyl]acetate	n-propyl [3-ethoxy-4-[(N,N-diethylcarbamido)methoxy]phenyl]acetate; propyl 4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxybenzeneacetate; [3-ethoxy-4-[(N,N-diethylcarbamido)methoxy]phenyl]acetic acid n-propyl ester; Benzeneacetic acid, 4-[2-(diethylamino)-2-oxoethoxy]-3-ethoxy-, propyl ester
167	271		606143-52-6	2933.99	5-[(4-bromo-2-chlorophenyl)amino]-4-fluoro-N-(2-hydroxyethoxy)-1-methyl-1H-benzimidazole-6-carboxamide	1H-Benzimidazole-6-carboxamide, 5-[(4-bromo-2-chlorophenyl)amino]-4-fluoro-N-(2-hydroxyethoxy)-1-methyl-
168	272		691882-47-0	2933.39	4-hydroxybenzoic acid -- (2S,4E)-N-methyl-5-[5-(propan-2-yloxy)pyridin-3-yl]pent-4-en-2-amine (1:1)	4-hydroxybenzoic acid -- [(E)-(S)-4-(5-isopropoxy-pyridin-3-yl)-1-methylbut-3-enyl]methylamine (1:1); Benzoic acid, 4-hydroxy-, compd. with (2S,4E)-N-methyl-5-[5-(1-methylethoxy)-3-pyridinyl]-4-penten-2-amine (1:1)
169	273		548797-97-3	2933.39	N-(2-[[[(2S)-3-[[1-(4-chlorobenzyl)piperidin-4-yl]amino]-2-hydroxy-2-methylpropyl]oxy]-4-hydroxyphenyl]acetamide	N-[2-[[[(2S)-3-[[1-(4-chlorophenyl)methyl]-4-piperidinyl]amino]-2-hydroxy-2-methylpropoxy]-4-hydroxyphenyl]acetamide; N-[2-[[[(2S)-3-[[1-(4-chlorobenzyl)piperidin-4-yl]amino]-2-hydroxy-2-methylpropyl]oxy]-4-hydroxyphenyl]acetamide
170	274		942436-93-3	2933.99	4-amino-8-(2,5-dimethoxyphenyl)-N-propylcinnoline-3-carboxamide	3-Cinnolinecarboxamide, 4-amino-8-(2,5-dimethoxyphenyl)-N-propyl-
171	275		942437-37-8	2933.99	4-amino-8-(2-fluoro-6-methoxyphenyl)-N-propylcinnoline-3-carboxamide	4-amino-8-(2-fluoro-6-methoxyphenyl)cinnoline-3-carboxylic acid propylamide; 3-Cinnolinecarboxamide, 4-amino-8-(2-fluoro-6-methoxyphenyl)-N-propyl-
172	276		51077-14-6	2933.99	(2S)-1-(tert-butoxycarbonyl)azetidine-2-carboxylic acid	1-tert-butyl ester (2S)-azetidine-1,2-dicarboxylic acid

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173	277			631916-97-7	2933.99	(2S)-N-(4-((Z)-amino(methoxyimino)methyl)benzyl)-1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyethanoyl)azetidene-2-carboxamide benzenesulphonic acid (1:1)	(2S)-1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyacetyl)-N-(4-(N'-methoxycarbamidoyl)benzyl)azetidene-2-carboxamide benzenesulfonate (salt); (2S)-1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyacetyl)-N-[[4-[imino(methoxyamino)methyl]phenyl]methyl]-2-azetidene-carboxamide benzenesulfonate (1:1); 2-Azetidinecarboxamide, 1-((2R)-2-[3-chloro-5-(difluoromethoxy)phenyl]-2-hydroxyacetyl)-N-[[4-[imino(methoxyamino)methyl]phenyl]methyl]-, (2S)-, benzenesulfonate (1:1)
174	278			722543-31-9	2933.59	2-[ethyl[3-((4-((5-(2-((3-fluorophenyl)amino)-2-oxoethyl)-1H-pyrazol-3-yl)amino)quinazolin-7-yl)oxy)propyl]amino)ethyl dihydrogen phosphate	2-[[3-((4-((5-(2-((3-fluorophenyl)amino)-2-oxoethyl)-1H-pyrazol-3-yl)amino)quinazolin-7-yl)oxy)propyl](ethyl)amino)ethyl dihydrogen phosphate; 5-[[7-[3-[ethyl[2-(phosphonoxy)ethyl]amino]propoxy]-4-quinazolinyl]amino]-N-(3-fluorophenyl)-1H-pyrazole-3-acetamide; 1H-Pyrazole-3-acetamide, 5-[[7-[3-[ethyl[2-(phosphonoxy)ethyl]amino]propoxy]-4-quinazolinyl]amino]-N-(3-fluorophenyl)-
175	280			893428-72-3	2934.99	N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methyl-1-piperazinyl)ethoxy]-5-[[tetrahydro-2H-pyran-4-yl]oxy]-4-quinazolinamine -- (2E)-2-butenedioate (1:2)	N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methylpiperazin-1-yl)ethoxy]-5-(tetrahydro-2H-pyran-4-yloxy)quinazolin-4-amine di[(2E)-but-2-enedioate]; N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methylpiperazin-1-yl)ethoxy]-5-(tetrahydro-2H-pyran-4-yloxy)quinazolin-4-amine difumarate; 4-Quinazolinamine, N-(5-chloro-1,3-benzodioxol-4-yl)-7-[2-(4-methyl-1-piperazinyl)ethoxy]-5-[[tetrahydro-2H-pyran-4-yl]oxy]-, (2E)-2-butenedioate (1:2)
176	281			941690-55-7	2935.00	3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]quinoline-4-carboxamide	3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]-4-quinolinecarboxamide; 4-Quinolinecarboxamide, 3-[(methylsulfonyl)amino]-2-phenyl-N-[(1S)-1-phenylpropyl]-
177	282			220100-81-2	2934.99	(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine] (S,S)-2,3-dihydroxybutanedioate	(R)-spiro[1-azabicyclo[2.2.2]octane-3,2'(3'H)-furo[2,3-b]pyridine] D-tartrate
178	283			220099-91-2	2934.99	(2R)-3'H-spiro[4-azabicyclo[2.2.2]octane-2,2'-furo[2,3-b]pyridine]	(R)-spiro[1-azabicyclo[2.2.2]octane-3,2'(3'H)-furo[2,3-b]pyridine]
179	285			288385-88-6	2933.99	4-fluoro-2-methyl-1H-indol-5-ol	1H-Indol-5-ol, 4-fluoro-2-methyl-
180	286			376608-74-1	2934.99	2-(((3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylsulfanyl)pyrimidin-4-yl]amino]-2,2-dimethyltetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-yl]oxy)ethanol	2-(((3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylthio)pyrimidin-4-yl]amino]-2,2-dimethyltetrahydro-3aH-cyclopenta[d][1,3]dioxol-4-yl]oxy)ethanol; Ethanol, 2-(((3aR,4S,6R,6aS)-6-[[5-amino-6-chloro-2-(propylthio)-4-pyrimidinyl]amino]tetrahydro-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]oxy)-
181	287			376608-71-8	2921.49	(1R,2S)-2-(3,4-difluorophenyl)cyclopropanaminium (2R)-hydroxy(phenyl)ethanoate	(1R,2S)-2-(3,4-difluorophenyl)cyclopropanaminium (2R)-hydroxy(phenyl)acetate; (aR)-(1R,2S)-a-hydroxibenzeneacetic acid -- 2-(3,4-difluorophenyl)cyclopropanamine (1:1); Benzeneacetic acid, a-hydroxy-, (aR)-(1R,2S)-compd. with 2-(3,4-difluorophenyl)cyclopropanamine (1:1)
182	288			179688-01-8	2933.59	7-(benzyloxy)-6-methoxyquinazolin-4(3H)-one	6-methoxy-7-(phenylmethoxy)-4(3H)-quinazolinone; 4(3H)-Quinazolinone, 6-methoxy-7-(phenylmethoxy)-
185	310			1028026-83-6	2933.19	5-methyl-1-(propan-2-yl)-4-[4-(propan-2-yloxy)benzyl]-1,2-dihydro-3H-pyrazol-3-one	5-methyl-1-(1-methylethyl)-4-[[4-((1-methylethyl)oxy)phenyl]methyl]-1,2-dihydro-3H-pyrazol-3-one; 1,2-dihydro-5-methyl-4-[[4-(1-methylethoxy)phenyl]methyl]-1-(1-methylethyl)-3H-pyrazol-3-one; 3H-Pyrazol-3-one, 1,2-dihydro-5-methyl-4-[[4-(1-methylethoxy)phenyl]methyl]-1-(1-methylethyl)-
207	342			1034457-07-2	2921.49	2-(2,3-dihydro-1H-inden-2-yl)propan-2-amine hydrochloride	{1-(2,3-dihydro-1H-inden-2-yl)-1-methylethyl}amine hydrochloride; 2,3-dihydro-a,a-dimethyl-1H-indene-2-ethanamine hydrochloride; 1H-Indene-2-ethanamine, 2,3-dihydro-,a,a-dimethyl-, hydrochloride (1:1);

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208	343			1035455-90-3	2922.19	(2R)-1-(5-bromo-2,3-difluorophenoxy)-3- [[1-(2,3-dihydro-1H-inden-2-yl)-2- methylpropan-2- yl]amino]propan-2-ol hydrochloride	(2R)-1-(5-bromo-2,3-difluorophenoxy)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-propanol hydrochloride; (2R)-1-[(5-bromo-2,3-difluorophenyl)oxy]-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-propanol hydrochloride; 2-Propanol, 1-(5-bromo-2,3-difluorophenoxy)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-. Hydrochloride (1:1), (2R)-
209	344			1035455-87-8	2922.19	ethyl (2E)-3-(3-[[[(2R)-3-[[1-(2,3-dihydro-1H-inden-2-yl)-2-methylpropan-2-yl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]prop-2-enoate hydrochloride	ethyl (2E)-3-(3-[[[(2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]oxy]-4,5-difluorophenyl]-2-propenoate hydrochloride; 2-Propenoic acid, 3-[-3[(2R)-3-[[2-(2,3-dihydro-1H-inden-2-yl)-1,1-dimethylethyl]amino]-2-hydroxypropyl]-4,5-difluorophenyl]-ethyl ester, hydrochloride (1:1), (2E)-
245	391			289042-10-0	2935.00	N-5-[(diphenylphosphoryl)methyl]-4-(4-fluorophenyl)-6-(propan-2-yl)pyrimidin-2-yl]-N-methylmethanesulfonamide	N-5-[(diphenylphosphoryl)methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)pyrimidin-2-yl]-N-methylmethanesulfonamide; N-5-[(diphenylphosphinyl)methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)-2-pyrimidinyl]-N-methylmethanesulfonamide; Methanesulfonamide, N-5-[(diphenylphosphinyl)methyl]-4-(4-fluorophenyl)-6-(1-methylethyl)-2-pyrimidinyl]-N-methyl-
280	433			143785-86-8	2922.49	4-(1-aminocyclopropyl)-2,3,5-trifluorobenzoic acid	2,3,5-trifluorobenzoic acid, 4-(1-Aminocyclopropyl)-
281	434			143785-87-9	2924.29	4-[1-(acetylamino)cyclopropyl]-2,3,5-trifluorobenzoic acid	4-(1-acetylaminocyclopropyl)-2,3,5-trifluorobenzoic acid; 2,3,5-trifluorobenzoic acid, 4-(1-Acetylaminocyclopropyl)-
301	518			150812-21-8	2921.51	N4-[(4-fluorophenyl)methyl]-2-nitro-1,4-benzenediamine	N4-(4-fluorobenzyl)-2-nitrobenzene-1,4-diamine; 1,4-Benzenediamine, N4-[(4-fluorophenyl)methyl]-2-nitro-
302	519			150812-23-0	2924.29	ethyl {4-[(4-fluorobenzyl)amino]-2-nitrophenyl}carbamate	ethyl {4-[(4-fluorophenyl)methyl]amino}-2-nitrophenyl}carbamate; Carbamic acid, [4-[[[(4-fluorophenyl)methyl]amino]-2-nitrophenyl]-, ethyl ester
323	547			68672-66-2	2934.10	(Z)-alpha-[[2-(1,1-dimethylethoxy)-1,1-dimethyl-2-oxoethoxy]imino]-2-[[[(triphenylmethyl)amino]-4-thiazoleacetic acid	
336	562			1137606-74-6	2933.99	6-fluoro-3-hydroxy-2-pyrazinecarbonitrile dicyclohexylamine	2-Pyrazinecarbonitrile, 6-fluoro-3,4-dihydro-3-oxo-, compd. with N-cyclohexylcyclohexanamine (1:1)
340	566			753015-42-8	2934.99	(R,E)-3-(2-(pyrrolidin-3-yl)vinyl)-5-tetrahydro-2H-pyran-4-yloxy]pyridine	
341	567			145783-14-8	2933.59	4,6-dichloro-5-nitro-2-propylthiopyrimidine	Pyrimidine, 4,6-dichloro-5-nitro-2-(propylthio)-
342	568			274693-53-7	2932.99	phenylmethyl N-[(3aS,4R,6S,6aR)-tetrahydro-6-hydroxy-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]-carbamate	Carbamic acid, N-[(3aS,4R,6S,6aR)-tetrahydro-6-hydroxy-2,2-dimethyl-4H-cyclopenta-1,3-dioxol-4-yl]-, phenylmethyl ester
343	569			56718-71-9	2909.50	4-(2-methoxyethyl)-phenol	p-(2-Methoxyethyl)phenol; p-Hydroxyphenethyl methyl ether; Phenol, p-(2-methoxyethyl)-

PROPRIETARY INFORMATION
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PUBLIC VERSION

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*Additional information
accepted per Chairman's
office 8/4/10 (C.F.T.)*

August 2, 2010

Per CBI 10-307
The Honorable Marilyn R. Abbott
Secretary to the Commission
United States International Trade Commission
500 E. Street, S.W.
Washington, DC 20436

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Fax: 312 565-1782

Business Proprietary Information
Contained in Brackets [] at
Attachment 1

PUBLIC VERSION

Re: Inv. No. 332-TA-520; Advice Concerning the Addition of Certain
Pharmaceutical Products and Chemical Intermediates to the
Pharmaceutical Appendix of the HTS

Dear Secretary Abbott:

On behalf of the Pharmaceutical Research and Manufacturers of America
("PhRMA") and pursuant to the invitation for comments published at 75 Fed. Reg. 33824
(June 15, 2010), we hereby provide additional data to supplement attachment 1 of our
July 14, 2010 submission. Since our original submission, certain pharmaceutical
producers have provided to us additional information regarding their imports into and
exports from the United States. We are now providing this information to the
Commission in Attachment 1 to this submission.

Confidential Treatment is requested for certain bracketed, business proprietary
information contained in this submission in accordance with 19 C.F.R. Part 201, for the
following reason: Attachment 1 contains information concerning the value of imports
and exports by specific companies, revealing the operations of these individual

companies. Disclosure of the foregoing confidential information would likely either impair the Commission's ability to obtain information necessary to perform its functions, or would cause substantial harm to the competitive position of the submitting companies.

Please contact the undersigned should you have any questions.

Respectfully submitted,



Matthew T. McGrath
BARNES, RICHARDSON & COLBURN
Counsel to PhRMA

Attachment 1

PUBLIC VERSION

Attachment 1

Estimated 2010 Import & Export Values

Table 3: Proposed Chemical Intermediates

No.	ID	Submitter	Estimated 2010 Import Value	Estimated 2010 Export Value	CASRN	HS code	Preferred name	Synonyms
	INN				320367-13-3	2933.29	lixisenatide	
	INN				302962-49-8	2934.10	dasatinib	
	INN				461432-26-8	2932.99	dapagliflozin	
349	578				27262-47-1	2933.39	(S)-1-butyl-N-(2,6-dimethylphenyl)piperidine-2-carboxamide	2-Piperidinecarboxamide, 1-butyl-N-(2,6-dimethylphenyl)-, (2S)-

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PROPRIETARY INFORMATION
SUBJECT TO PROTECTIVE ORDER
DELETED FROM BRACKETS []



ROCHEM INTERNATIONAL, INC

Chemical, Nutraceutical & Pharmaceutical Ingredients

July 12, 2010

Marilyn Abbott, Secretary
United States International Trade Commission
500 E Street, S.W.
Washington, DC 20436

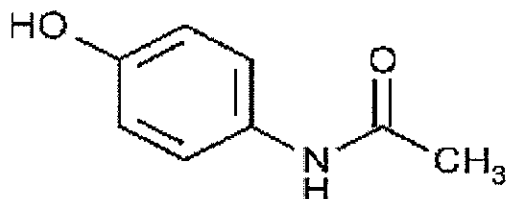
RE: Pharmaceutical Products and Chemical Intermediates, Fourth Review: Advices Concerning the Addition of Certain Products to the Pharmaceutical Appendix to the HTS, investigation No. 332-520; Rochem International Inc's request for addition of Paracetamol

Paracetamol: CAS Number: 103-90-2

Molecular Structure:

$C_8H_9NO_2$

Molecular Wt: 151.16



Acetamide, *N*-(4-hydroxyphenyl)-4'-Hydroxyacetanilide

HTS Code: 2924-29-6210

Dear Secretary,

Rochem International Inc. is filling this submission in response to the Federal Register June 15, 2010 notice requesting comments on the addition of certain pharmaceutical products and chemical intermediates used for the product of pharmaceuticals to the Pharmaceutical Appendix to the HTS. In response to the USTR's request, Rochem International, Inc. would like to request that the product with the International Nonproprietary Name (INN) of paracetamol (CAS number 103-90-2, IUPAC name Acetamide, *N*-(4-hydroxyphenyl)-4'-Hydroxyacetanilide) be added to Table I of the Pharmaceutical Appendices for those pharmaceuticals eligible for zero duty. The addition of paracetamol to the zero-for-zero pharmaceutical initiative would directly benefit the United States pharmaceutical manufacturing industry.

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Rochem International Inc., located at 980 South 2nd Street, Ronkonkoma, NY 11779, was founded in 1994 as an importer of chemical, nutritional and pharmaceutical raw materials of Chinese origin. It has grown to become a leading distributor of pharmaceutical ingredients, dietary supplements, sweeteners and excipients. In addition to our global headquarters located in Ronkonkoma New York, Rochem also operates a fully staffed and experienced China office located in Qingdao, China. Rochem focuses much of its resources on providing regulatory services for its customers as well as quality and compliance assistance to the manufacturers we choose to procure from. The goal has always been to bridge the gap between the manufacturing practices of the facilities in China and the regulatory standards here in the United States.

Rochem International, Inc currently purchases paracetamol through two manufacturers, one of them being Anqiu Lu'an Pharmaceutical Co., Ltd, located at Xiao He Ya, North of Anqiu City, Shandong Province, P.R. China 262100. Anqiu Lu'an Pharmaceutical's annual production capacity of paracetamol API is 24,000 MT. Approximately 80% of this material is exported to foreign markets including USA, UK, Germany, France, Russia, India and South Africa. In addition to Paracetamol API powder, Anqiu Lu'an Pharmaceutical also manufactures finished dosage Acetaminophen in the form of tablets, granules and capsules. Rochem International has visited and inspected this facility on multiple occasions and has found the facility to be satisfactory in following GMP guidelines. The Food and Drug Administration of the United States (FDA) last inspected the facility in August 2009 and they subsequently passed.

Rochem International's second supplier of paracetamol is Zhejiang Kangle Pharmaceutical Co., Ltd located at 112 Ma An Chi Road, 5/F Kangle Building, Wenzhou, China. They have been established for over 60 years and are considered one of the largest active pharmaceutical ingredient manufacturers in China. They've expanded their capabilities to include manufacturing of paracetamol tablets. The FDA inspected the Zhejiang Kangle facility in April 2009.

The tariff classification currently stands that paracetamol (acetaminophen) in final dosage form is imported into the United States under the subheading 3004.90.9128 of the Harmonized Tariff Schedule of the United States (HTS) and thusly classifying rate of duty as free. This HTS provides for "Medicaments consisting of mixed or unmixed products for therapeutic or prophylactic uses, put up in measured doses (including those in the form of transdermal administration systems) or in

forms or packings for retail sale: Other: Other: Other: Medicaments primarily affecting the central nervous system: Analgesics, antipyretics and nonhormonal anti-inflammatory agents: Other.” This allows for all paracetamol (acetaminophen) products to be not only fully manufactured but also packaged in any other country and then enter the United States free of duty. Both companies that Rochem purchases paracetamol powder from also export final dosage formulas that contain paracetamol and enter the United States free of duty.

Another product directly related to the pharmaceutical in question, paracetamol, is the commonly referred to Acetaminophen DC 90, a medicament in granular form containing paracetamol as the active ingredient, prepared for direct compression into tablet form. Acetaminophen DC 90 also enters the United States free of duty under the Harmonized Tariff Schedule subheading 3003.90.000. This classification provides for “Medicaments consisting of two or more constituents which have been mixed together for therapeutic or prophylactic uses, not put up in measured doses or in forms of packings for retail sale: Other.” Under this HTS subheading, pharmaceutical raw materials that were manufactured in a foreign country can enter the United States free of duty if they are then further processed outside the United States. If paracetamol can enter the country free of duty in a powder form mixed with another substance, it is hard to justify the pharmaceutical entering the country in its purest form with a current rate of duty of 6.5% ad valorem under the HTS subheading 2924.29.6210.

According to the Bureau of Labor Statistics, US Department of Labor, the pharmaceutical and medicinal manufacturing industry employment is predicted to increase by 6% over the period of 2008-2018 as evident in Attachment 1. It must be noted that the national average of growth for all industries in the United States is 11%, almost twice what is predicted for the pharmaceutical and medicinal manufacturing industry. While an increase in employment statistics is positive, actions must be taken to further preserve and increase the growth of the United States manufacturing industries.

Although the pharmaceutical and medicinal manufacturing industry is expected to slightly increase in its employment, it must be pointed out, as stated in Attachment 1, which the most significant growth in employment is for life scientists with a doctoral degree. The prospect for jobs in the research and development sector of the industry is favorable; however paracetamol (acetaminophen) is available to consumers in a generic form where there is less need and

requirement for further research and development. Most notably is the percent changes for first-line supervisors/managers of production and operating workers; inspectors, testers, sorters, samplers, and weighers; and packaging and filling machine operators and tenders for which all three occupation categories are predicted to increase only 1.8% over a 10 year period 2008-2018). Even grimmer is the predicted statistic of a decrease of 7.5% employment for transportation and material moving occupations in the pharmaceutical industry. This is even more reason to allow a generic raw material into the United States for further manufacturing and processing free of duty.

Currently Rochem International, Inc imports both paracetamol USP/EP with an assay of 98-101% and paracetamol in a direct compression grade with an assay of 87.5-92.5%. Comparing the importation of paracetamol (98-101% assay) by Rochem in the year 2008 to the importation and sales in the year 2009, there was an increase of 43.8%. In the first 5 months of 2010 compared to the first 5 months of 2009 there has been no increase in sales of this product. Rochem has been importing and promoting sales of paracetamol for over 10 years. This is directly correlated to the decreasing demands of Rochem's customers, who are the generic pharmaceutical manufacturers of the United States.

To provide the commission on further information regarding paracetamol (acetaminophen) importation, Attachment 2, Attachment 3 and Attachment 4 are spreadsheets of information extracted from Datamyne. The total quantities imported of paracetamol under the HTS subheading 2924.29.6210 in 2008 were 3,040,065 kilograms. There was 3,516,841 kilograms imported in 2009 which equates to a 15.7% increase from 2008 to 2009. Comparing the quantity of importation for January- April of 2009 to January-April 2010, there was a decrease from 1,150,966 kgs to 921,400 kgs, an almost 20% decrease. As generic acetaminophen is a widely and commonly used analgesic and antipyretic drug, these recent importation quantities of unprocessed paracetamol are distressing.

Rochem International, Inc. believes that it is in the best interest of the United States to negotiate the expansion of the pharmaceutical zero-for-zero initiative and fully supports its efforts to do so to the World Trade Organization Members during the upcoming negotiations. The addition of the pharmaceutical paracetamol in powder form to the Table I of the Pharmaceutical Appendices receiving zero duty is critical to ensuring the product is competitive in the world market. The current HTS subheading 2924.29.6210 with a duty of 6.5% ad valorem does not allow this

possibility. This addition would unquestionably result in direct benefit of the United States pharmaceutical industry and its workers.

Rochem International, Inc. would like to thank you for your time and consideration of this submission. If you have any questions regarding this document, please contact myself at the corporate office.

Sincerely,

A handwritten signature in black ink, appearing to read 'Robin Frisch', with a stylized, overlapping loop at the end.

Robin Frisch

President

Rochem International, Inc.

Enclosed: Attachments 1-4

Attachment 1



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Significant Points

- Production occupations and professional and related occupations each account for more than a quarter of all workers in the industry.
- Earnings are higher than in other manufacturing industries.
- Job prospects should be favorable for life scientists, particularly those with a doctoral degree.

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Nature of the Industry

The pharmaceutical and medicine manufacturing industry develops and produces a variety of medicinal and other health-related products that save the lives of millions of people from various diseases and permits many people suffering from illness to recover to lead productive lives.

Goods and services. Thousands of medications are available today for diagnostic, preventive, and therapeutic uses. In addition to aiding in the treatment of infectious diseases such as pneumonia, tuberculosis, malaria, influenza, and sexually transmitted diseases, these medicines also help prevent and treat cardiovascular disease, asthma, diabetes, hepatitis, cystic fibrosis, and cancer. For example, anti-nausea drugs help cancer patients endure chemotherapy; clot-buster drugs help stroke patients avoid brain damage; and psychoactive drugs reduce the severity of mental illness for many people. Antibiotics and vaccines have dramatically reduced the occurrences of such diseases as diphtheria, syphilis, and whooping cough. Discoveries in veterinary drugs have controlled various diseases, some of which are transmissible to humans.

The U.S. pharmaceutical industry has achieved worldwide prominence through research and development (R&D) on new drugs, and spends a relatively high proportion of its revenue on R&D compared with other industries. Each year, pharmaceutical industry testing involves millions of compounds, yet may eventually yield fewer than 100 new prescription medicines.

For the majority of firms in this industry, the actual manufacture of drugs is the last stage in a lengthy process that begins with scientific research to discover new products and to improve or modify existing ones. The R&D departments in pharmaceutical and medicine manufacturing firms start this process by seeking and rapidly testing libraries of thousands to millions of new chemical compounds with the potential to prevent, combat, or alleviate symptoms of diseases or other health problems. Scientists use sophisticated techniques, including computer simulation, combinatorial chemistry, and high-throughput screening (HTS), to hasten and simplify the discovery of potentially useful new compounds.

Most firms devote a substantial portion of their R&D budgets to applied research, using scientific knowledge to develop a drug targeted to a specific use. For example, an R&D unit may focus on developing a compound that will effectively slow the advance of breast cancer. If the discovery phase yields promising compounds, technical teams then attempt to develop a safe and effective product based on the discoveries.

To test new products in development, a research method called "screening" is used. To screen an antibiotic, for example, a sample is first placed in a bacterial culture. If the antibiotic is effective, it is next tested on infected laboratory animals. Laboratory animals also are used to study the safety and efficacy of the new drug. A new drug is selected for testing on humans only if it either promises to have therapeutic advantages over drugs already in use or is safer. Drug screening is a laborious and costly process—only 1 in every 5,000 to 10,000 compounds screened eventually becomes an approved drug.

After laboratory screening, firms conduct clinical investigations, or "trials," of the drug on human patients. Human clinical trials normally take place in three phases. First, medical scientists administer the drug to a small group of healthy volunteers to determine and adjust dosage levels, and monitor for side effects. If a drug appears useful and safe, additional tests are conducted in two more phases, each phase using a successively larger group of volunteers or carefully selected patients. The final round of testing often involves a very large panel, sometimes upwards of 10,000 individuals.

After a drug successfully passes animal and clinical tests, the U.S. Food and Drug Administration's (FDA) Center for Drug Evaluation and Research (CDER) must review the drug's performance on human patients before approving the substance for commercial use. The entire process, from the first discovery of a promising new compound to FDA approval, can take over a decade and cost hundreds of millions of dollars.

After FDA approval, problems of production methods and costs must be worked out before manufacturing begins. If the original laboratory process of preparing and compounding the ingredients is complex and too expensive, pharmacists, chemists, chemical engineers, packaging engineers, and production specialists are assigned to develop a manufacturing process economically adaptable to mass production. After the drug is marketed, new production methods may be developed to incorporate new technology or to transfer the manufacturing operation to a new production site.

Most pharmaceutical production plants are highly automated. Milling and micronizing machines, which pulverize substances into extremely fine particles, are used to reduce bulk chemicals to the required size. These finished chemicals are combined and processed further in mixing machines. The mixed ingredients may then be mechanically capsulated, pressed into tablets, or made into

solutions. One type of machine, for example, automatically fills, seals, and stamps capsules. Other machines fill bottles with capsules, tablets, or liquids, and seal, label, and package the bottles.

Quality control and quality assurance are vital in this industry. Many production workers are assigned full time to quality control and quality assurance functions, whereas other employees may devote part of their time to these functions. For example, although pharmaceutical company sales representatives, often called detailers, work primarily in marketing, they engage in quality control when they assist pharmacists in checking for outdated products.

Industry organization. The pharmaceutical and medicine manufacturing industry consists of over 2,500 places of employment, located throughout the country. R&D laboratories perform the work of drug discovery and development, while manufacturing plants produce the final drugs for consumers. Most R&D laboratories are located separately from manufacturing plants, but some labs and production plants are integrated.


There are three main types of pharmaceutical companies. Large, or mainline, pharmaceutical companies are established firms that have many approved drugs already on the market. These companies often have significant numbers of R&D laboratories and manufacturing plants throughout the Nation and around the world. In contrast, smaller pharmaceutical companies are usually newer firms that often do not have any approved drugs on the market. As a result, these firms almost exclusively perform R&D. In addition to developing their own drugs, some small pharmaceutical companies perform contract research for other pharmaceutical companies. Finally, generic pharmaceutical companies manufacture drugs that are no longer protected by patents. Because their products are all established drugs, they devote fewer resources to R&D and more to manufacturing.

Recent developments. Advances in biotechnology are transforming drug discovery and development. Bioinformatics, a branch of biotechnology using information technologies to work with biological data like DNA, is a particularly dynamic new area of work. Scientists have learned a great deal about human genes, but the real work—translating that knowledge into viable new drugs—has only recently begun. So far, millions of people have benefited from medicines and vaccines developed through biotechnology, and several hundred new biotechnologically-derived medicines are currently in the pipeline. These new medicines, all of which are in human clinical trials or awaiting FDA approval, include drugs for cancer, infectious diseases, autoimmune diseases, neurologic disorders, and HIV/AIDS and related conditions.

Many new drugs are expected to be developed in the coming years. Advances in technology and the knowledge of how cells work will allow pharmaceutical and medicine manufacturing makers to become more efficient in the drug discovery process. New technology allows life scientists to test millions of drug candidates far more rapidly than in the past. Other new technology, such as regenerative therapy, also will allow the natural healing process to work faster, or enable the regrowth of missing or damaged tissue. In addition, technology based on the study of genes is being explored to develop vaccines to prevent or treat diseases that have eluded traditional vaccines, such as AIDS, malaria, tuberculosis, and cervical cancer.

Advances in manufacturing processes are also impacting the industry. While pharmaceutical manufacturers have long devoted resources to new drug development as a source for future profits, firms are increasingly realizing that improvements throughout the drug pipeline are needed to stay competitive. Along with other manufacturing industries, pharmaceutical manufacturers are realizing that quality products can best be produced when quality

improvements occur at all stages and when processes are continually updated with the latest technologies and methods. Controlling the product flow through the supply chain also ensures that valuable resources do not sit idle but are put to work, and that final products reach consumers without delay.

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Working Conditions

Hours. In 2008, production workers in pharmaceutical and medicine manufacturing worked an average of 40.9 hours per week, compared with 33.6 for workers in all industries. Some employees work in plants that operate around the clock—three shifts a day, 7 days a week. In most plants, workers receive extra pay when assigned to the second or third shift. Because drug production is subject to little seasonal variation or fluctuation in economic activity, work is steady.


Work environment. Working conditions in pharmaceutical plants are better than those in most other manufacturing plants, and work-related injuries are rare. Much emphasis is placed on keeping equipment and work areas clean because of the danger of contamination. Plants usually are air-conditioned, well lighted, and quiet. Ventilation systems protect workers from dust, fumes, and disagreeable odors. Special precautions are taken to protect the relatively small number of employees who work with infectious cultures and poisonous chemicals. With the exception of work performed by material handlers and maintenance workers, most jobs require little physical effort.

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Employment

Pharmaceutical and medicine manufacturing provided 289,800 wage and salary jobs in 2008. Pharmaceutical and medicine manufacturing establishments usually employ many workers. About 87 percent of this industry's jobs in 2008 were in establishments that employed more than 100 workers. Over half of all jobs are in California, New Jersey, Puerto Rico, Pennsylvania, and New York.

Under the North American Industry Classification System (NAICS), workers in research and development (R&D) establishments that are not part of a manufacturing facility are included in a separate industry—research and development in the physical, engineering, and life sciences. However, due to the importance of R&D work to the pharmaceutical and medicine manufacturing industry, drug-related R&D is discussed in this statement even though a large proportion of pharmaceutical industry-related R&D workers are not included in the employment data.

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Occupations in the Industry

About 31 percent of all jobs in the pharmaceutical and medicine manufacturing industry are in professional and related occupations, mostly scientists and science technicians. About 27 percent of jobs are in production occupations, including both low skilled and high skilled jobs. The remaining jobs are primarily management, and office and administrative support occupations (table 1).

Professional and related occupations. Scientists, engineers, and technicians conduct research to develop new drugs. Others work to streamline production methods and improve environmental

and quality control. Life scientists are among the largest scientific occupations in this industry. Most of these scientists are *biological* and *medical scientists* who produce new drugs using biotechnology to recombine the genetic material of animals or plants. Biological scientists normally specialize in a particular area. *Biologists* and *bacteriologists* study the effect of chemical agents on infected animals. *Biochemists* study the action of drugs on body processes by analyzing the chemical combination and reactions involved in metabolism, reproduction, and heredity. *Microbiologists* grow strains of microorganisms that produce antibiotics. *Physiologists* investigate the effect of drugs on body functions and vital processes. *Pharmacologists* and *zoologists* study the effects of drugs on animals. *Virologists* grow viruses, and develop vaccines and test them in animals. *Botanists*, with their special knowledge of plant life, contribute to the discovery of botanical ingredients for drugs. Other biological scientists include *pathologists*, who study normal and abnormal cells or tissues, and *toxicologists*, who are concerned with safety, dosage levels, and the compatibility of different drugs. *Medical scientists*, who also may be physicians, conduct clinical research, test products, and oversee human clinical trials.

The work of physical scientists, particularly *chemists*, also is important in the development of new drugs. *Combinatorial* and *computational chemists* create molecules and test them rapidly for desirable properties. *Organic chemists*, often using combinatorial chemistry, then combine new compounds for biological testing. *Physical chemists* separate and identify substances, determine molecular structure, help create new compounds, and improve manufacturing processes. *Radiochemists* trace the course of drugs through body organs and tissues. *Pharmaceutical chemists* set standards and specifications for the form of products and for storage conditions; they also see that drug labeling and literature meet the requirements of State and Federal laws. *Analytical chemists* test raw and intermediate materials and finished products for quality.

Science technicians, such as *biological* and *chemical technicians*, play an important part in research and development of new medicines. They set up, operate, and maintain laboratory equipment, monitor experiments, analyze data, and record and interpret results. Science technicians usually work under the supervision of scientists or engineers.

Although engineers account for a small fraction of scientific and technical workers, they make significant contributions toward improving quality control and production efficiency. *Chemical engineers* design equipment and devise manufacturing processes. *Bioprocess engineers*, who are similar to chemical engineers, design fermentation vats and various bioreactors for microorganisms that will produce a given product. *Industrial engineers* plan equipment layout and workflow to maintain efficient use of plant facilities.

Production occupations. Among the larger of the production occupations, *assemblers and fabricators* perform various assembly tasks in teams, rotating through the different tasks rather than specializing in a single task. They also may decide how the work is to be assigned and how different tasks are to be performed.

Other production workers specialize in one part of the production process. *Chemical processing machine setters, operators, and tenders*, such as *pharmaceutical operators*, control machines that produce tablets, capsules, ointments, and medical solutions. Included among these operators are *mixing and blending machine setters, operators, and tenders*, who tend milling and grinding machines that reduce mixtures to particles of designated sizes. *Extruding, forming, pressing, and compacting machine setters, operators, and tenders* tend tanks and kettles in which solutions are mixed and compounded to make up creams, ointments, liquid medications, and powders.

Crushing, grinding, polishing, mixing, and blending workers operate machines that compress ingredients into tablets. *Coating, painting, and spraying machine setters, operators, and tenders*, often called capsule coaters, control a battery of machines that apply coatings that flavor, color, preserve, or add medication to tablets, or control disintegration time. Throughout the production process, *inspectors, testers, sorters, samplers, and weighers* ensure consistency and quality. *Tablet testers*, for example, inspect tablets for hardness, chipping, and weight to assure conformity with specifications. After the drug is prepared and inspected, it is bottled or otherwise packaged by *packaging and filling machine operators and tenders*.

Plant workers who do not operate or maintain equipment perform a variety of other tasks. Some drive industrial trucks or tractors to move materials around the plant, load and unload trucks and railroad cars, or package products and materials by hand.

Other occupations. At the top of the managerial group are executives who make policy decisions concerning matters of finance, marketing, and research. Other managerial workers include *natural sciences managers* and *industrial production managers*.

Workers in office and administrative support occupations include *secretaries and administrative assistants, general office clerks*, and others who keep records on personnel, payroll, raw materials, sales, and shipments.


Sales representatives, wholesale and manufacturing, describe their company's products to physicians, pharmacists, dentists, and health services administrators. These workers serve as lines of communication between their companies and clients.

Table 1. Employment of wage and salary workers in pharmaceutical and medicine manufacturing, 2008 and projected change, 2008-2018.
(Employment in thousands)

Occupation	Employment, 2008		Percent Change, 2008-18
	Number	Percent	
All occupations	289.8	100	6.1
Management, business, and financial occupations	51.9	17.9	3.9
Top executives	6.7	2.3	-6.6
Industrial production managers	4.5	1.5	1.7
Natural sciences managers	4.7	1.6	1.8
Accountants and auditors	2.8	1	5.3
Professional and related occupations	91.1	31.4	9.8
Computer specialists	11.3	3.9	4.3
Engineers	9.4	3.2	22.9
Biochemists and biophysicists	6.7	2.3	22.2
Microbiologists	3.1	1.1	1.5
Medical scientists, except epidemiologists	14	4.8	22.1
Chemists	16.4	5.7	1.8
Biological technicians	5.4	1.9	1.7
Chemical technicians	9.4	3.3	1.7
Sales and related occupations	6.9	2.4	-3.8
Sales representatives, wholesale and manufacturing, technical and scientific products	4.6	1.6	-5.4
Office and administrative support occupations	31.4	10.8	-1.6

Occupation	Employment, 2008		Percent Change, 2008-18
	Number	Percent	
Customer service representatives	3.2	1.1	11.9
Shipping, receiving, and traffic clerks	3.5	1.2	-8.4
Secretaries and administrative assistants	8.6	3	-1
Installation, maintenance, and repair occupations	12.4	4.3	9.2
Industrial machinery mechanics	3.4	1.2	20
Maintenance and repair workers, general	5.2	1.8	5
Production occupations	79.5	27.5	9.3
First-line supervisors/managers of production and operating workers	8	2.8	1.8
Team assemblers	3.8	1.3	3.9
Chemical processing machine setters, operators, and tenders	13.2	4.6	7.5
Mixing and blending machine setters, operators, and tenders	12.8	4.4	41.9
Inspectors, testers, sorters, samplers, and weighers	8.1	2.8	1.8
Packaging and filling machine operators and tenders	21.6	7.4	1.8
Transportation and material moving occupations	12.1	4.2	-7.5
Laborers and material movers, hand	9.4	3.3	-10.3

NOTE: Columns may not add to total due to omission of occupations with small employment.
SOURCE: BLS National Employment Matrix, 2008-18.

[About this section](#) 

Training and Advancement

Training requirements for jobs in the pharmaceutical and medicine manufacturing industry range from a few hours of on-the-job training to years of formal education plus job experience.

However, because of the large number of workers in professional occupations, bachelor's and graduate degrees are common.

Scientific and engineering occupations. A bachelor of science degree is typically the minimum requirement for these workers, although scientists involved in research and development usually have a master's or doctoral degree. A doctoral degree is generally the minimum requirement for medical scientists, and those who administer drug or gene therapy to patients in clinical trials must have a medical degree. Because biotechnology is not one discipline, but the interaction of several disciplines, the best preparation for work in biotechnology is training in a traditional biological science, such as genetics, molecular biology, biochemistry, virology, or biochemical engineering. Individuals with a scientific background and several years of industry experience may eventually advance to managerial positions. Some companies offer training programs to help scientists and engineers keep abreast of new developments in their fields and to develop administrative skills. These programs may include meetings and seminars with consultants from various fields. Many companies encourage scientists and engineers to further their education; some companies provide financial assistance or full reimbursement of expenses for this purpose. Publication of scientific papers also is encouraged.

Science technician occupations. To fill these jobs, most companies prefer to hire graduates of technical institutes or community colleges or those who have completed college courses in

chemistry, biology, mathematics, or engineering. Some companies, however, require science technicians to hold a bachelor's degree in a biological or chemical science. In many firms, newly hired workers begin as laboratory helpers or aides, performing routine jobs such as cleaning and arranging bottles, test tubes, and other equipment.

The experience required for higher-level technician jobs varies from company to company. Usually, employees advance over a number of years from assistant technician, to technician, to senior technician, and then to technical associate, or supervisory technician.

Production occupations. Manufacturers usually hire inexperienced workers and train them on the job, although workers with some postsecondary training, particularly in manufacturing, are preferred. Beginners in production jobs assist experienced workers and learn to operate processing equipment. With experience, employees may advance to more skilled jobs in their departments.

The industry places a heavy emphasis on continuing education for employees, and many firms provide classroom training in safety, environmental and quality control, and technological advances. Many companies encourage production workers to take courses related to their jobs at local schools and technical institutes. College courses in chemistry and related areas are particularly encouraged for highly skilled production workers who operate sophisticated equipment. Some companies reimburse workers for part, or all, of their tuition. Skilled production workers with leadership ability may advance to supervisory positions.

Sales and related occupations. Pharmaceutical manufacturing companies prefer to hire college graduates, particularly those with strong scientific backgrounds. In addition to a 4-year degree, most newly employed pharmaceutical sales representatives complete rigorous formal training programs revolving around their company's product lines.

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Outlook

Employment is expected to increase as demand for drugs continues to grow. Prospects should be favorable, particularly for life scientists with a doctoral degree.

Employment change. The number of wage and salary jobs in pharmaceutical and medicine manufacturing is expected to increase by 6 percent over the 2008-18 period, compared with 11 percent projected for all industries combined. Even during fluctuating economic conditions, demand is expected to remain strong for this industry's products, including the diagnostics used in hospitals, laboratories, and homes, the vaccines used routinely on infants and children, analgesics and other symptom-easing drugs; antibiotics and other drugs for life-threatening diseases, and "lifestyle" drugs for the treatment of nonlife-threatening conditions.

The use of drugs, particularly antibiotics and vaccines, has helped to eradicate or limit a number of deadly diseases, but many others, such as cancer, Alzheimer's, and heart disease, continue to elude cures. Ongoing research and the manufacture of new products to combat these and other diseases will continue to contribute to employment growth. Demand also is expected to increase as the population expands because many of the pharmaceutical and medicine manufacturing industry's products are related to preventive or routine healthcare, rather than just illness. The growing number of older people, who tend to consume more of all types of healthcare services,

will further stimulate demand—along with the growth of both public and private health insurance programs, which increasingly cover the cost of drugs and medicines.

Another factor propelling demand is the increasing popularity of "lifestyle" drugs. These drugs treat symptoms of chronic nonlife-threatening conditions resulting from aging or genetic predisposition and can enhance one's self-confidence or physical appearance. Other factors expected to increase the demand for drugs include greater personal income and the rising health consciousness and expectations of the general public.

Despite the increasing demand for drugs, several factors will limit employment growth in the industry. Drug producers and buyers are placing more emphasis on cost effectiveness, due to the extremely high costs of developing new drugs. Competition from the producers of generic drugs also will put pressure on many firms in this industry as more brand-name drug patents expire. On the manufacturing side, continuing improvements in manufacturing processes will improve productivity in pharmaceutical plants, while many companies are also manufacturing more of their products overseas.

Strong demand is anticipated for professional occupations—especially for life and physical scientists engaged in R&D, the backbone of the pharmaceutical and medicine manufacturing industry. Much of the basic biological research done in recent years has resulted in new knowledge, including the successful identification of genes. Life and physical scientists will be needed to take this knowledge to the next stage, which is to understand how certain genes function so that gene therapies can be developed to treat diseases. Computer specialists such as systems analysts, biostatisticians, and computer support specialists also will be in demand as disciplines such as biology, chemistry, and electronics continue to converge and become more interdisciplinary, creating demand in rapidly emerging fields such as bioinformatics and nanotechnology.

Steady demand also is projected for production occupations. Employment of office and administrative support workers is expected to grow more slowly than the industry as a whole, as companies streamline operations and increasingly rely on computers.

Job prospects. Prospects should be favorable, particularly for life scientists with a doctoral degree. Unlike many other manufacturing industries, the pharmaceutical and medicine manufacturing industry is not highly sensitive to changes in economic conditions. Even during periods of high unemployment, work is likely to be relatively stable in this industry, because consumption of medicine does not vary greatly with economic conditions. Additional openings will arise from the need to replace workers who transfer to other industries, retire, or leave the workforce for other reasons.

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Earnings

Industry earnings. Earnings of workers in the pharmaceutical and medicine manufacturing industry are higher than the average for all manufacturing industries. In 2008, production or nonsupervisory workers in this industry averaged \$821 a week, while those in all manufacturing industries averaged \$724 a week. Wages in selected occupations in pharmaceutical and medicine manufacturing appear in table 2.

Table 2. Median hourly wages of the largest occupations in pharmaceutical and medicine manufacturing, May 2008

Occupation	Pharmaceutical and medicine manufacturing	All industries
Biochemists and biophysicists	\$42.59	\$39.83
Medical scientists, except epidemiologists	42.07	34.90
Chemists	31.98	31.84
First-line supervisors/managers of production and operating workers	28.91	24.25
Chemical technicians	21.72	20.25
Chemical equipment operators and tenders	20.98	21.76
Biological technicians	19.88	18.46
Inspectors, testers, sorters, samplers, and weighers	16.78	15.02
Mixing and blending machine setters, operators, and tenders	15.31	15.04
Packaging and filling machine operators and tenders	13.36	11.73

SOURCE: BLS Occupational Employment Statistics, May 2008.

Benefits and union membership. Workers in the pharmaceutical and medicine manufacturing industry generally receive paid sick and vacation leave and health insurance, and many employers contribute to pension plans and life insurance. Some firms may offer their medicines to employees at a reduced cost.

Only about 5 percent of the workers in the pharmaceutical and medicine manufacturing industry are union members or are covered by a union contract, compared with about 14 percent of workers throughout private industry.

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Sources of Additional Information

DISCLAIMER:

LINKS TO NON-BLS INTERNET SITES ARE PROVIDED FOR YOUR CONVENIENCE AND DO NOT CONSTITUTE AN ENDORSEMENT.

For additional information about careers in pharmaceutical and medicine manufacturing, contact the human resources departments of individual pharmaceutical and medicine manufacturing companies.

For information about careers in biotechnology, contact:

Biotechnology Industry Organization, 1201 Maryland Ave. SW., Suite 900, Washington, DC 20024. Internet: <http://www.bio.org>

For information on careers in pharmaceutical and medicine manufacturing, contact:

Pharmaceutical Research and Manufacturers of America (PhRMA), 950 F St. NW., Washington, DC 20004. Internet: <http://www.phrma.org>

Information on these key pharmaceutical and medicine manufacturing occupations may be found in the 2010-11 edition of the *Occupational Outlook Handbook*.

[Assemblers and fabricators](#)

- [Biological scientists](#)
- [Chemists and materials scientists](#)
- [Computer software engineers and computer programmers](#)
- [Computer systems analysts](#)
- [Engineering and natural sciences managers](#)
- [Engineers](#)
- [Inspectors, testers, sorters, samplers, and weighers](#)
- [Medical scientists](#)
- [Sales representatives, wholesale and manufacturing](#)
- [Science technicians](#)

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NAICS Coverage

NAICS 3254

NOTE:

THE DATA PRESENTED IN THIS STATEMENT FOLLOW THE INDUSTRY COVERAGE OF THESE NAICS CODES. TEXT REFERENCES MAY NOT STRICTLY FOLLOW NAICS INDUSTRY DEFINITIONS.

Suggested citation: Bureau of Labor Statistics, U.S. Department of Labor, *Career Guide to Industries, 2010-11 Edition*, Pharmaceutical and Medicine Manufacturing, on the Internet at <http://www.bls.gov/oco/cg/cgs009.htm> (visited July 09, 2010).

Last Modified Date: December 17, 2009

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U.S. Bureau of Labor Statistics | Office of Occupational Statistics and Employment Projections, PSB Suite 2135, 2 Massachusetts Avenue, NE

Washington, DC 20212-0001

www.bls.gov/oco/CG | Telephone: 1-202-691-5700 | [Contact CGI](#)

Attachment 2

UNITED STATES - IMPORT

Client:
Rochem International, Inc.
07/12/2010 - 17:37

Period 01/2008 to 12/2008
Harmonized Code 2924296210 - ACETAMINOPHEN

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Dec-08	2924296210	FRANCE	CHICAGO, ILLINOIS	NEW YORK CITY, NEW YORK	337,718.00	337,718.00	45,200.00	7.47	0	0
Dec-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	824,396.00	792,049.00	136,000.00	6.06	824,396.00	792,049.00
Dec-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	116,408.00	86,160.00	12,000.00	9.7	116,408.00	86,160.00
Dec-08	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	46,250.00	45,000.00	7,500.00	6.17	46,250.00	45,000.00
Dec-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	145,872.00	144,000.00	32,000.00	4.56	0	0
Dec-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	94,460.00	86,160.00	12,000.00	7.87	94,460.00	86,160.00
Dec-08	2924296210	FRANCE	MOBILE, ALABAMA	MOBILE, ALABAMA	29,920.00	24,920.00	3,000.00	9.97	29,920.00	24,920.00
Dec-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	74,250.00	72,214.00	15,000.00	4.95	74,250.00	72,214.00
Dec-08	2924296210	ITALY	CLEVELAND, OHIO	CHICAGO, ILLINOIS	61,341.00	52,499.00	2,019.00	30.38	61,341.00	52,499.00
Dec-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	82,940.00	79,940.00	18,000.00	4.61	82,940.00	79,940.00
Dec-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	PHILADELPHIA, PA.	104,648.00	74,400.00	12,000.00	8.72	104,648.00	74,400.00
Dec-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	142,560.00	135,004.00	24,000.00	5.94	142,560.00	135,004.00
Dec-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	66,928.00	64,723.00	12,600.00	5.31	66,928.00	64,723.00
Dec-08	2924296210	CHINA	CHICAGO, ILLINOIS	CHICAGO, ILLINOIS	23,042.00	23,040.00	2,400.00	9.6	23,042.00	23,040.00
Dec-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	NEW YORK CITY, NEW YORK	232,816.00	172,320.00	24,000.00	9.7	232,816.00	172,320.00
Nov-08	2924296210	CHINA	WILMINGTON, N. CAROLINA	DETROIT, MICHIGAN	90,207.00	50,670.00	9,000.00	10.02	90,207.00	50,670.00
Nov-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	195,600.00	184,476.00	30,000.00	6.52	195,600.00	184,476.00
Nov-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	SAN FRANCISCO, CALIF.	115,153.00	86,160.00	12,000.00	9.6	115,153.00	86,160.00
Nov-08	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	46,250.00	45,000.00	7,500.00	6.17	46,250.00	45,000.00
Nov-08	2924296210	CANADA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	4,450.00	4,000.00	1	4,450.00	4,450.00	4,000.00
Nov-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	116,408.00	86,160.00	12,000.00	9.7	116,408.00	86,160.00
Nov-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	369,810.00	357,565.00	63,000.00	5.87	369,810.00	357,565.00
Nov-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	CLEVELAND, OHIO	116,408.00	86,160.00	14,160.00	8.22	116,408.00	86,160.00
Nov-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	375,325.00	361,280.00	67,200.00	5.59	0	0
Nov-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	116,408.00	86,160.00	12,000.00	9.7	116,408.00	86,160.00
Nov-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	54,320.00	50,820.00	11,000.00	4.94	54,320.00	50,820.00
Oct-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	409,882.00	386,680.00	66,400.00	6.17	0	0
Oct-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	260,800.00	245,168.00	40,000.00	6.52	260,800.00	245,168.00
Oct-08	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	103,658.00	103,593.00	6,328.00	16.38	103,658.00	103,593.00
Oct-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	453,047.00	344,640.00	48,000.00	9.44	453,047.00	344,640.00
Oct-08	2924296210	ITALY	NORFOLK, VIRGINIA	NORFOLK, VIRGINIA	80,222.00	77,722.00	11,047.00	7.26	80,222.00	77,722.00
Oct-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	738,761.00	708,976.00	134,400.00	5.5	738,761.00	708,976.00
Oct-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	58,630.00	56,680.00	11,000.00	5.33	58,630.00	56,680.00
Oct-08	2924296210	INDIA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	40,503.00	39,803.00	6,000.00	6.75	40,503.00	39,803.00
Sep-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	65,120.00	63,170.00	11,000.00	5.92	65,120.00	63,170.00
Sep-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	662,119.00	624,640.00	102,400.00	6.47	0	0

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Sep-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	109,680.00	102,154.00	24,000.00	4.57	109,680.00	102,154.00
Sep-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	39,882.00	37,585.00	10,200.00	3.91	39,882.00	37,585.00
Sep-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	130,400.00	122,584.00	20,000.00	6.52	130,400.00	122,584.00
Sep-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	117,173.00	86,160.00	12,000.00	9.76	117,173.00	86,160.00
Aug-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	65,120.00	63,270.00	11,000.00	5.92	65,120.00	63,270.00
Aug-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	456,734.00	430,880.00	92,800.00	4.92	0	0
Aug-08	2924296210	IRELAND	BALTIMORE, MARYLAND	BALTIMORE, MARYLAND	14,844.00	6,886.00	1,617.00	9.18	14,844.00	6,886.00
Aug-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	150,117.00	144,325.00	24,600.00	6.1	150,117.00	144,325.00
Aug-08	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	226,764.00	217,764.00	41,400.00	5.48	226,764.00	217,764.00
Aug-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	25,800.00	24,800.00	4,000.00	6.45	25,800.00	24,800.00
Aug-08	2924296210	CHINA	DETROIT, MICHIGAN	CHICAGO, ILLINOIS	34,980.00	33,000.00	6,000.00	5.83	0	0
Jul-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	71,232.00	67,200.00	19,200.00	3.71	0	0
Jul-08	2924296210	CHINA	DETROIT, MICHIGAN	CHICAGO, ILLINOIS	198,432.00	187,200.00	32,000.00	6.2	0	0
Jul-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	50,600.00	48,228.00	8,400.00	6.02	50,600.00	48,228.00
Jul-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	73,792.00	71,587.00	12,600.00	5.86	73,792.00	71,587.00
Jul-08	2924296210	IRELAND	BALTIMORE, MARYLAND	BALTIMORE, MARYLAND	4,780.00	2,944.00	600	7.97	4,780.00	2,944.00
Jul-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	60,720.00	58,770.00	11,000.00	5.52	60,720.00	58,770.00
Jul-08	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	287,729.00	287,329.00	13,579.00	21.19	287,729.00	287,329.00
Jul-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	72,180.00	69,180.00	18,000.00	4.01	72,180.00	69,180.00
Jul-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	152,981.00	148,800.00	24,000.00	6.37	152,981.00	148,800.00
Jun-08	2924296210	CHINA	DETROIT, MICHIGAN	CHICAGO, ILLINOIS	178,080.00	168,000.00	48,000.00	3.71	0	0
Jun-08	2924296210	TURKEY	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	229,683.00	208,320.00	33,600.00	6.84	229,683.00	208,320.00
Jun-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	102,304.00	89,280.00	14,400.00	7.1	102,304.00	89,280.00
Jun-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	69,705.00	65,705.00	18,000.00	3.87	69,705.00	65,705.00
Jun-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	87,990.00	80,483.00	21,000.00	4.19	87,990.00	80,483.00
Jun-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	259,200.00	236,271.00	60,000.00	4.32	259,200.00	236,271.00
Jun-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	147,584.00	143,174.00	25,200.00	5.86	147,584.00	143,174.00
Jun-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	44,000.00	42,150.00	11,000.00	4	44,000.00	42,150.00
May-08	2924296210	TURKEY	CHICAGO, ILLINOIS	CHICAGO, ILLINOIS	7,367.00	6,200.00	1,000.00	7.37	7,367.00	6,200.00
May-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	231,500.00	223,200.00	36,000.00	6.43	231,500.00	223,200.00
May-08	2924296210	TURKEY	MOBILE, ALABAMA	SAVANNAH, GEORGIA	529,116.00	508,116.00	96,600.00	5.48	529,116.00	508,116.00
May-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	144,081.00	139,671.00	25,200.00	5.72	144,081.00	139,671.00
May-08	2924296210	TURKEY	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	236,700.00	223,200.00	36,000.00	6.58	236,700.00	223,200.00
May-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	59,360.00	56,000.00	16,000.00	3.71	0	0
May-08	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	88,570.00	88,320.00	13,800.00	6.42	88,570.00	88,320.00
May-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	73,962.00	71,587.00	12,600.00	5.87	73,962.00	71,587.00
May-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	87,980.00	80,473.00	22,000.00	4	87,980.00	80,473.00
Apr-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	67,004.00	64,799.00	12,600.00	5.32	67,004.00	64,799.00
Apr-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	259,200.00	238,491.00	60,000.00	4.32	259,200.00	238,491.00
Apr-08	2924296210	TURKEY	MOBILE, ALABAMA	SAVANNAH, GEORGIA	302,352.00	290,352.00	55,200.00	5.48	302,352.00	290,352.00
Apr-08	2924296210	CHINA	DETROIT, MICHIGAN	CHICAGO, ILLINOIS	111,300.00	105,000.00	30,000.00	3.71	0	0
Apr-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	175,538.00	168,108.00	31,600.00	5.56	175,538.00	168,108.00
Apr-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	236,334.00	226,432.00	47,000.00	5.03	236,334.00	226,432.00
Apr-08	2924296210	CHINA	CHICAGO, ILLINOIS	CHICAGO, ILLINOIS	71,232.00	67,200.00	19,200.00	3.71	0	0
Apr-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	36,720.00	36,000.00	3,564.00	10.3	36,720.00	36,000.00
Apr-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	676,770.00	669,600.00	108,000.00	6.27	676,770.00	669,600.00

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Apr-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	47,000.00	45,150.00	10,009.00	4.7	47,000.00	45,150.00
Apr-08	2924296210	INDIA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	11,968.00	11,783.00	3,000.00	3.99	11,968.00	11,783.00
Apr-08	2924296210	TURKEY	CHICAGO, ILLINOIS	LOS ANGELES, CALIFORNIA	375,560.00	372,000.00	60,000.00	6.26	375,560.00	372,000.00
Mar-08	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	219,565.00	219,495.00	11,941.00	18.39	219,565.00	219,495.00
Mar-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	127,958.00	123,254.00	28,600.00	4.47	127,958.00	123,254.00
Mar-08	2924296210	INDIA	BALTIMORE, MARYLAND	NEW YORK CITY, NEW YORK	4,275.00	4,250.00	500	8.55	4,275.00	4,250.00
Mar-08	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	16,000.00	15,500.00	4,000.00	4	16,000.00	15,500.00
Mar-08	2924296210	TURKEY	CHICAGO, ILLINOIS	LOS ANGELES, CALIFORNIA	76,380.00	74,400.00	12,000.00	6.37	76,380.00	74,400.00
Mar-08	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	86,257.00	79,497.00	20,000.00	4.31	86,257.00	79,497.00
Mar-08	2924296210	TURKEY	MOBILE, ALABAMA	SAVANNAH, GEORGIA	271,440.00	259,440.00	55,200.00	4.92	271,440.00	259,440.00
Mar-08	2924296210	TURKEY	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	197,272.00	192,372.00	27,600.00	7.15	197,272.00	192,372.00
Feb-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	211,192.00	203,575.00	58,000.00	3.64	211,192.00	203,575.00
Feb-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	55,826.00	52,500.00	15,000.00	3.72	55,826.00	52,500.00
Feb-08	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	298,340.00	297,600.00	48,000.00	6.22	298,340.00	297,600.00
Feb-08	2924296210	TURKEY	MOBILE, ALABAMA	SAVANNAH, GEORGIA	269,440.00	259,440.00	55,200.00	4.88	269,440.00	259,440.00
Feb-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	303,492.00	290,147.00	59,600.00	5.09	303,492.00	290,147.00
Feb-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	162,633.00	158,223.00	28,800.00	5.65	162,633.00	158,223.00
Jan-08	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	88,720.00	88,320.00	13,800.00	6.43	88,720.00	88,320.00
Jan-08	2924296210	TURKEY	MOBILE, ALABAMA	SAVANNAH, GEORGIA	279,440.00	259,440.00	55,200.00	5.06	279,440.00	259,440.00
Jan-08	2924296210	INDIA	BALTIMORE, MARYLAND	NEW YORK CITY, NEW YORK	4,271.00	4,250.00	500	8.54	4,271.00	4,250.00
Jan-08	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	82,500.00	78,700.00	22,000.00	3.75	82,500.00	78,700.00
Jan-08	2924296210	FRANCE	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	162,680.00	157,896.00	34,000.00	4.78	162,680.00	157,896.00
Jan-08	2924296210	CHINA	MIAMI, FLORIDA	MIAMI, FLORIDA	41,500.00	39,000.00	10,000.00	4.15	41,500.00	39,000.00
Jan-08	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	67,004.00	64,799.00	12,600.00	5.32	67,004.00	64,799.00
Jan-08	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	168,112.00	158,350.00	63,000.00	2.67	168,112.00	158,350.00
Jan-08	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	187,626.00	177,004.00	54,800.00	3.42	0	0
TOTAL					17,530,653.00	16,432,833.00	3,040,065.00		14230761	13287031

Figures hold to seasonal adjustments and rounding

Source: U.S. Census Bureau.

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Attachment 3

UNITED STATES - IMPORT

Client:
 Roche International, Inc.
 07/06/2010 - 16:43

Period 01/2009 to 12/2009
 Harmonized Code 2924296210 - ACETAMINOPHEN

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Dec-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	130,960.00	129,280.00	32,000.00	4.09	0	0
Dec-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	1,010,180.00	947,760.00	132,000.00	7.65	1,010,180.00	947,760.00
Dec-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	411,450.00	406,993.00	96,000.00	4.29	411,450.00	406,993.00
Dec-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	36,275.00	35,025.00	7,500.00	4.84	36,275.00	35,025.00
Dec-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	131,700.00	124,700.00	30,000.00	4.39	131,700.00	124,700.00
Dec-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	99,600.00	92,604.00	24,000.00	4.15	99,600.00	92,604.00
Dec-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	104,414.00	103,914.00	13,800.00	7.57	104,414.00	103,914.00
Dec-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	275,690.00	269,190.00	60,000.00	4.59	275,690.00	269,190.00
Nov-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	199,273.00	196,320.00	43,823.00	4.55	199,273.00	196,320.00
Nov-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	49,800.00	46,457.00	12,000.00	4.15	49,800.00	46,457.00
Nov-09	2924296210	CHINA	DETROIT, MICHIGAN	CHICAGO, ILLINOIS	65,480.00	64,640.00	16,000.00	4.09	0	0
Nov-09	2924296210	CHINA	CHICAGO, ILLINOIS	LOS ANGELES, CALIFORNIA	6,391.00	4,848.00	1,200.00	5.33	6,391.00	4,848.00
Nov-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	77,997.00	77,697.00	2,226.00	35.04	77,997.00	77,697.00
Nov-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	73,540.00	71,540.00	18,000.00	4.09	73,540.00	71,540.00
Nov-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	91,320.00	88,320.00	13,800.00	6.62	91,320.00	88,320.00
Nov-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	65,480.00	64,640.00	16,000.00	4.09	0	0
Nov-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	797,790.00	775,440.00	108,000.00	7.39	797,790.00	775,440.00
Oct-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	97,440.00	90,684.00	24,000.00	4.06	97,440.00	90,684.00
Oct-09	2924296210	CHINA	PHILADELPHIA, PA.	SEATTLE, WASHINGTON	48,720.00	44,137.00	12,000.00	4.06	48,720.00	44,137.00
Oct-09	2924296210	TURKEY	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	207,740.00	204,240.00	27,600.00	7.53	207,740.00	204,240.00
Oct-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	196,440.00	193,920.00	48,000.00	4.09	0	0
Oct-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	730,580.00	689,280.00	96,000.00	7.61	730,580.00	689,280.00
Oct-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	99,757.00	99,682.00	2,856.00	34.93	99,757.00	99,682.00
Oct-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	443,676.00	439,670.00	109,000.00	4.07	443,676.00	439,670.00
Oct-09	2924296210	FRANCE	CHICAGO, ILLINOIS	CHICAGO, ILLINOIS	0	0	0	0	324,899.00	323,899.00

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Oct-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	47,415.00	44,915.00	10,000.00	4.74	47,415.00	44,915.00
Oct-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	89,200.00	86,000.00	20,000.00	4.46	89,200.00	86,000.00
Oct-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	37,550.00	36,300.00	7,500.00	5.01	37,550.00	36,300.00
Sep-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	75,100.00	72,600.00	15,000.00	5.01	75,100.00	72,600.00
Sep-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	359,825.00	356,670.00	85,000.00	4.23	359,825.00	356,670.00
Sep-09	2924296210	CHINA	MIAMI, FLORDIA	MIAMI, FLORDIA	3,086.00	2,935.00	500	6.17	0	0
Sep-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	130,960.00	129,280.00	32,000.00	4.09	0	0
Sep-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	448,500.00	430,800.00	60,000.00	7.48	448,500.00	430,800.00
Sep-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	87,200.00	84,000.00	20,000.00	4.36	87,200.00	84,000.00
Sep-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	121,191.00	114,377.00	29,850.00	4.06	121,191.00	114,377.00
Sep-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	98,400.00	96,400.00	20,000.00	4.92	98,400.00	96,400.00
Aug-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	SAVANNAH, GEORGIA	35,450.00	34,200.00	7,500.00	4.73	35,450.00	34,200.00
Aug-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	324,008.00	324,000.00	80,000.00	4.05	324,008.00	324,000.00
Aug-09	2924296210	CHINA	SAVANNAH, GEORGIA	NEW YORK CITY, NEW YORK	7,800.00	7,734.00	1,500.00	5.2	7,800.00	7,734.00
Aug-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	547,920.00	529,920.00	82,800.00	6.62	547,920.00	529,920.00
Aug-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	463,334.00	406,336.00	55,200.00	8.39	463,334.00	406,336.00
Aug-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	211,805.00	209,088.00	51,200.00	4.14	0	0
Aug-09	2924296210	CHINA	PHILADELPHIA, PA.	PHILADELPHIA, PA.	146,160.00	137,181.00	36,000.00	4.06	146,160.00	137,181.00
Aug-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	181,586.00	179,086.00	5,527.00	32.85	181,586.00	179,086.00
Aug-09	2924296210	ITALY	NORFOLK, VIRGINIA	NORFOLK, VIRGINIA	90,256.00	89,756.00	3,387.00	26.65	90,256.00	89,756.00
Jul-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	95,664.00	92,164.00	2,863.00	33.41	95,664.00	92,164.00
Jul-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	133,229.00	131,520.00	32,000.00	4.16	0	0
Jul-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	592,160.00	572,160.00	89,400.00	6.62	592,160.00	572,160.00
Jul-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	198,290.00	194,670.00	45,000.00	4.41	198,290.00	194,670.00
Jul-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	658,390.00	551,424.00	76,800.00	8.57	658,390.00	551,424.00
Jul-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	NEW YORK CITY, NEW YORK	102,856.00	86,160.00	12,000.00	8.57	102,856.00	86,160.00
Jul-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	73,110.00	71,110.00	18,000.00	4.06	73,110.00	71,110.00
Jun-09	2924296210	CANADA	NEW ORLEANS, LOUISIANA	NEW ORLEANS, LOUISIANA	8,625.00	8,175.00	1	8,625.00	8,625.00	8,175.00
Jun-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	151,353.00	147,360.00	33,000.00	4.59	151,353.00	147,360.00
Jun-09	2924296210	INDIA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	3,192.00	3,000.00	3,000.00	1.06	3,192.00	3,000.00
Jun-09	2924296210	INDIA	DETROIT, MICHIGAN	DETROIT, MICHIGAN	5,755.00	4,200.00	400	14.39	5,755.00	4,200.00
Jun-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	784,997.00	654,816.00	91,200.00	8.61	784,997.00	654,816.00

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Jun-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	72,150.00	68,400.00	15,000.00	4.81	72,150.00	68,400.00
Jun-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	NEW YORK CITY, NEW YORK	42,104.00	34,464.00	4,800.00	8.77	42,104.00	34,464.00
Jun-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	164,480.00	158,067.00	32,000.00	5.14	164,480.00	158,067.00
Jun-09	2924296210	CHINA	DETROIT, MICHIGAN	SEATTLE, WASHINGTON	67,749.00	66,880.00	16,000.00	4.23	0	0
Jun-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	81,299.00	80,256.00	19,200.00	4.23	0	0
Jun-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	547,920.00	529,920.00	82,800.00	6.62	547,920.00	529,920.00
May-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	230,347.00	227,392.00	54,400.00	4.23	0	0
May-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	100,748.00	97,508.00	27,600.00	3.65	100,748.00	97,508.00
May-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	157,503.00	156,003.00	5,622.00	28.02	157,503.00	156,003.00
May-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	592,258.00	473,880.00	66,000.00	8.97	592,258.00	473,880.00
May-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	NEW YORK CITY, NEW YORK	162,426.00	129,240.00	18,000.00	9.02	162,426.00	129,240.00
May-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	1,003,278.00	970,278.00	40,020.00	25.07	1,003,278.00	970,278.00
May-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	71,280.00	67,502.00	12,000.00	5.94	71,280.00	67,502.00
Apr-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	161,882.00	155,982.00	27,600.00	5.87	161,882.00	155,982.00
Apr-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	46,250.00	45,000.00	7,500.00	6.17	46,250.00	45,000.00
Apr-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	821,880.00	794,880.00	12,420.00	66.17	821,880.00	794,880.00
Apr-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	170,906.00	165,809.00	39,600.00	4.32	170,906.00	165,809.00
Apr-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	520,046.00	387,720.00	54,000.00	9.63	520,046.00	387,720.00
Apr-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	PHILADELPHIA, PA.	173,854.00	129,240.00	18,000.00	9.66	173,854.00	129,240.00
Apr-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	47,170.00	43,670.00	11,000.00	4.29	47,170.00	43,670.00
Apr-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	67,749.00	66,880.00	16,000.00	4.23	0	0
Mar-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	CLEVELAND, OHIO	116,408.00	86,160.00	12,000.00	9.7	116,408.00	86,160.00
Mar-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	92,500.00	90,000.00	15,000.00	6.17	92,500.00	90,000.00
Mar-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	582,040.00	430,800.00	60,000.00	9.7	582,040.00	430,800.00
Mar-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	69,050.00	67,050.00	18,000.00	3.84	69,050.00	67,050.00
Mar-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	544,920.00	529,920.00	82,800.00	6.58	544,920.00	529,920.00
Mar-09	2924296210	CHINA	CLEVELAND, OHIO	CHICAGO, ILLINOIS	4,090.00	3,840.00	300	13.63	4,090.00	3,840.00
Mar-09	2924296210	TURKEY	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	112,491.00	103,914.00	13,800.00	8.15	112,491.00	103,914.00
Mar-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	PHILADELPHIA, PA.	116,408.00	86,160.00	12,000.00	9.7	116,408.00	86,160.00
Mar-09	2924296210	CHINA	BUFFALO, NEW YORK	BUFFALO, NEW YORK	25,402.00	24,313.00	6,950.00	3.65	25,402.00	24,313.00
Mar-09	2924296210	IRELAND	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	152,073.00	150,573.00	5,711.00	26.63	152,073.00	150,573.00
Mar-09	2924296210	FRANCE	CHICAGO, ILLINOIS	NEW YORK CITY, NEW YORK	486,456.00	486,456.00	64,000.00	7.6	0	0

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Feb-09	2924296210	CHINA	MOBILE, ALABAMA	LOS ANGELES, CALIFORNIA	44,800.00	41,800.00	4,000.00	11.2	44,800.00	41,800.00
Feb-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	20,000.00	19,250.00	5,000.00	4	20,000.00	19,250.00
Feb-09	2924296210	CHINA	MIAMI, FLORDIA	MIAMI, FLORDIA	13,565.00	13,480.00	725	18.71	0	0
Feb-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	744,050.00	721,050.00	110,400.00	6.74	744,050.00	721,050.00
Feb-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	171,934.00	169,728.00	38,400.00	4.48	0	0
Feb-09	2924296210	FRANCE	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	219,339.00	212,724.00	37,800.00	5.8	219,339.00	212,724.00
Feb-09	2924296210	CHINA	BUFFALO, NEW YORK	BUFFALO, NEW YORK	25,200.00	24,415.00	7,000.00	3.6	25,200.00	24,415.00
Feb-09	2924296210	FRANCE	CHICAGO, ILLINOIS	NEW YORK CITY, NEW YORK	555,579.00	555,579.00	72,000.00	7.72	0	0
Feb-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	232,816.00	172,320.00	24,000.00	9.7	232,816.00	172,320.00
Feb-09	2924296210	INDIA	NEW ORLEANS, LOUISIANA	CHARLESTON, S. CAROLINA	46,250.00	45,000.00	7,500.00	6.17	46,250.00	45,000.00
Jan-09	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	273,960.00	264,960.00	41,400.00	6.62	273,960.00	264,960.00
Jan-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	101,805.00	97,610.00	22,000.00	4.63	101,805.00	97,610.00
Jan-09	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	232,816.00	172,320.00	26,160.00	8.9	232,816.00	172,320.00
Jan-09	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	242,795.00	239,680.00	54,400.00	4.46	0	0
Jan-09	2924296210	FRANCE	CHICAGO, ILLINOIS	NEW YORK CITY, NEW YORK	850,014.00	850,014.00	113,600.00	7.48	0	0
Jan-09	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	93,581.00	90,000.00	20,000.00	4.68	93,581.00	90,000.00
Jan-09	2924296210	CHINA	CHICAGO, ILLINOIS	SEATTLE, WASHINGTON	24,295.00	22,723.00	5,400.00	4.5	24,295.00	22,723.00
Jan-09	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	48,270.00	44,770.00	11,000.00	4.39	48,270.00	44,770.00
Jan-09	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	63,090.00	58,726.00	13,500.00	4.67	63,090.00	58,726.00
Jan-09	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	334,800.00	314,112.00	60,000.00	5.58	334,800.00	314,112.00
TOTAL					23,710,136.00	22,187,736.00	3,516,841.00	9526.36	20330108	18829987

Figures hold to seasonal adjustments and rounding

Source: U.S. Census Bureau.

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Attachment 4

UNITED STATES - IMPORT

Client:
 Rochem International, Inc.
 07/06/2010 - 16:44

Period 01/2010 to 04/2010
 Harmonized Code 2924296210 - ACETAMINOPHEN

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Apr-10	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	261,006.00	261,000.00	40,000.00	6.53	261,006.00	261,000.00
Apr-10	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	87,950.00	87,000.00	20,000.00	4.4	87,950.00	87,000.00
Apr-10	2924296210	INDIA	NEW ORLEANS, LOUISIANA	SAVANNAH, GEORGIA	72,716.00	71,869.00	15,000.00	4.85	72,716.00	71,869.00
Apr-10	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	189,390.00	172,320.00	24,000.00	7.89	189,390.00	172,320.00
Apr-10	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	91,320.00	88,320.00	13,800.00	6.62	91,320.00	88,320.00
Apr-10	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	186,373.00	182,518.00	40,000.00	4.66	186,373.00	182,518.00
Mar-10	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	103,200.00	102,000.00	19,600.00	5.27	103,200.00	102,000.00
Mar-10	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	431,657.00	430,000.00	94,000.00	4.59	431,657.00	430,000.00
Mar-10	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	273,960.00	264,960.00	41,400.00	6.62	273,960.00	264,960.00
Mar-10	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	663,410.00	603,120.00	84,000.00	7.9	663,410.00	603,120.00
Feb-10	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	471,194.00	457,194.00	69,000.00	6.83	471,194.00	457,194.00
Feb-10	2924296210	TURKEY	SAVANNAH, GEORGIA	NEW YORK CITY, NEW YORK	106,950.00	79,252.00	13,800.00	7.75	106,950.00	79,252.00
Feb-10	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	349,824.00	345,620.00	81,000.00	4.32	349,824.00	345,620.00
Feb-10	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	49,800.00	46,477.00	12,000.00	4.15	49,800.00	46,477.00
Feb-10	2924296210	CHINA	NEW YORK CITY, NEW YORK	NEW YORK CITY, NEW YORK	72,900.00	71,900.00	18,000.00	4.05	72,900.00	71,900.00

Date	Harmonized Code	Country of Purchase	District of Entry	District of Unlading	General Total Value CIF US\$	General Total Value FOB US\$	General Quantity (Kilograms)	General Unit Value CIF US\$	Consumption Total Value CIF US\$	Consumption Total Value FOB US\$
Feb-10	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	662,770.00	603,120.00	84,000.00	7.89	662,770.00	603,120.00
Jan-10	2924296210	CHINA	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	264,724.00	261,720.00	62,000.00	4.27	264,724.00	261,720.00
Jan-10	2924296210	INDIA	DETROIT, MICHIGAN	DETROIT, MICHIGAN	14,970.00	11,160.00	1,200.00	12.48	14,970.00	11,160.00
Jan-10	2924296210	CHINA	CHARLESTON, S. CAROLINA	CHARLESTON, S. CAROLINA	45,865.00	44,865.00	10,000.00	4.59	45,865.00	44,865.00
Jan-10	2924296210	INDIA	NEW ORLEANS, LOUISIANA	SAVANNAH, GEORGIA	72,550.00	70,050.00	15,000.00	4.84	72,550.00	70,050.00
Jan-10	2924296210	TURKEY	SAVANNAH, GEORGIA	SAVANNAH, GEORGIA	182,640.00	176,640.00	27,600.00	6.62	182,640.00	176,640.00
Jan-10	2924296210	CHINA	DETROIT, MICHIGAN	LOS ANGELES, CALIFORNIA	65,480.00	64,640.00	16,000.00	4.09	0	0
Jan-10	2924296210	CHINA	PHILADELPHIA, PA.	NEW YORK CITY, NEW YORK	49,800.00	46,302.00	12,000.00	4.15	49,800.00	46,302.00
Jan-10	2924296210	TURKEY	LOS ANGELES, CALIFORNIA	LOS ANGELES, CALIFORNIA	852,490.00	775,440.00	108,000.00	7.89	852,490.00	775,440.00
TOTAL					5,622,939.00	5,317,487.00	921,400.00		5,557,459.00	5,252,847.00

Figures hold to seasonal adjustments and rounding

Source: U.S. Census Bureau.

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*Additional Information
Accepted per Chairman's
Op. 8-9-2010 (C.T.)* August 6, 2010

Per CBI 10-315

The Honorable Marilyn R. Abbott
Secretary to the Commission
United States International Trade Commission
500 E. Street, S.W.
Washington, DC 20436

475 Park Avenue South
New York, NY 10016
Tel: 212 725-0200
Fax: 212 889-4135

303 East Wacker Drive
Suite 1020
Chicago, IL 60601
Tel: 312 565-2000
Fax: 312 565-1782

Business Proprietary Information
Deleted from Brackets [] at
Attachment 1

PUBLIC VERSION

Re: Inv. No. 332-TA-520; Advice Concerning the Addition of Certain
Pharmaceutical Products and Chemical Intermediates to the
Pharmaceutical Appendix of the HTS

Dear Secretary Abbott:

On behalf of the Pharmaceutical Research and Manufacturers of America
("PhRMA") and pursuant to the invitation for comments published at 75 Fed. Reg. 33824
(June 15, 2010), we hereby provide additional data to supplement attachment 1 of our
July 14, 2010 submission. Since our original submission, certain pharmaceutical
producers have provided to us additional information regarding their imports into and
exports from the United States. We are now providing this information to the
Commission in Attachment 1 to this submission.

Confidential Treatment is requested for certain bracketed, business proprietary
information contained in this submission in accordance with 19 C.F.R. Part 201, for the
following reason: Attachment 1 contains information concerning the value of imports
and exports by specific companies, revealing the operations of these individual

companies. Disclosure of the foregoing confidential information would likely either impair the Commission's ability to obtain information necessary to perform its functions, or would cause substantial harm to the competitive position of the submitting companies.

Please contact the undersigned should you have any questions.

Respectfully submitted,



Matthew T. McGrath
BARNES, RICHARDSON & COLBURN
Counsel to PhRMA

ATTACHMENT 1

PUBLIC VERSION

NON CONFIDENTIAL

Attachment 1

Estimated 2010 U.S. Import & Export Values

Table 3: Proposed Chemical Intermediates

No.	ID	Submitter	Estimated 2010 Import Value	Estimated 2010 Export Value	CASRN	HS code	Preferred name	Synonyms
5	INN				319460-85-0	2933.39	axitinib	
6	INN				380843-75-4	2933.59	bosutinib	
63	INN				745013-59-6	3002.10	tremelimumab	
174	INN				218949-48-5	2937.19	tesamorelin	
218	INN				698387-09-6	2933.49	neratinib	
341	INN				98819-76-2	2934.99	esreboxetine	
358	INN				686344-29-6	2933.59	otenabant	
370	INN				880266-57-9	3002.10	tanezumab	
2	3				316173-29-2	2924.29	methyl (1S,2S,3S,4R)-3-[(1S)-1-amino-2-ethylbutyl]-4-[(tert-butoxycarbonyl)amino]-2-hydroxycyclopentanecarboxylate	methyl (1S,2S,3S,4R)-3-[(1S)-1-amino-2-ethylbutyl]-4-[[[(1,1-dimethylethoxy)carbonyl]amino]-2-hydroxycyclopentanecarboxylate; Methyl(1S,2S,3R,4R)-3-[(1S)-1-acetylamino]-2-ethylbutyl)-[[[(1,1-dimethylethoxy)carbonyl]amino]-2-hydroxy-cyclopentanecarboxylate; Cyclopentanecarboxylic acid, 3-[(1S)-1-amino-2-ethylbutyl]-4-[[[(1,1-dimethylethoxy)carbonyl]amino]-2-hydroxy-, methyl ester, (1S,2S,3S,4R)-
40	64				160969-03-9	2909.49	2-[2-(2,2,2-trifluoroethoxy)phenoxy]ethyl methanesulfonate	Ethanol, 2-[2-(2,2,2-trifluoroethoxy)phenoxy]-, methanesulfonate
40	64				239463-85-5	2933.99	3-[5-[(2R)-2-aminopropyl]-7-cyano-2,3-dihydro-1H-indol-1-yl]propyl benzoate (2R,3R)-2,3-dihydroxybutanedioate	3-[5-[(2R)-aminopropyl]-7-cyano-2,3-dihydro-1H-indol-1-yl]propyl benzoate (2R,3R)-monotartarate; 5-[(2R)-2-aminopropyl]-1-[3-(benzoyloxy)propyl]-2,3-dihydro-1H-indole-7-carbonitrile (2R,3R)-2,3-dihydroxybutanedioate (1:1); 1H-Indole-7-carbonitrile, 5-[(2R)-2-aminopropyl]-1-[3-(benzoyloxy)propyl]-2,3-dihydro-, (2R,3R)-2,3-dihydroxybutanedioate (1:1)
70	110				127660-04-2	2934.10	sodium (2Z)-(2-amino-1,3-thiazol-4-yl)(hydroxyimino)ethanoate	sodium (2Z)-(2-amino-1,3-thiazol-4-yl)(hydroxyimino)acetate; sodium (αZ)-2-amino-α-(hydroxyimino)-4-thiazoleacetate; 4-Thiazoleacetic acid, 2-amino-α-(hydroxyimino)-, monosodium salt, (αZ)-

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