



April 22, 2025

Ambassador Jamieson Greer  
United States Trade Representative  
Office of the U.S. Trade Representative  
600 17th Street NW  
Washington, DC 20508

Howard Lutnick  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Ave NW  
Washington, DC 20230

To Ambassador Greer and Secretary Lutnick:

The Security Industry Association (SIA) is a U.S.-based business trade association for security solution providers, with more than 1600 innovative member companies representing thousands of technology leaders who shape the future of the security industry.

**The U.S. is the largest market worldwide for security products, where the security industry contributes over \$430 billion to the economy and provides more than 2.1 million jobs in the United States.**<sup>1</sup> Our membership ranges from large global technology companies to locally owned and operated security industry businesses that develop, design, manufacture, install, or service security products. These products include alarm systems, access control, camera systems, communications equipment and systems, identity management solutions, as well as security-related unmanned systems, robotics, and a range of other cutting-edge security solutions that help keep our ports, airports, schools, borders, places of worship, and other components of critical infrastructure and communities safe.

Throughout the entire security ecosystem, SIA members consistently provide these critical life safety and security products to consumers at an affordable price. When faced with an uncertain and volatile international trade environment, companies are put under enormous strain as they struggle to ensure that they can continue to operate while facing increased costs along the supply chain. SIA maintains our steadfast view that U.S. trade policy should accelerate further growth and contribute to a competitive and innovative business climate that thrives as a result of sound, clear and predictable trade policy.

While we understand that the Administration is leveraging tariffs to restore fairness in U.S. trade relationships and achieve other foreign policy goals, we are concerned that while negotiations are ongoing under the 90-day period directed by the President, the American public is left to face significant economic consequences.

Unfortunately, the Administration's global tariff policies do not adequately consider the global value chain for the development and manufacturing of security products and security systems integration. Not only do these tariffs hurt U.S. security manufacturers by increasing the cost of key components as they compete globally, but additional applicability to finished goods will directly increase the cost of essential security and life safety products that are widely utilized to protect communities and preserve public safety throughout the United States.

For manufacturers, complex supply chains can take years to establish and cannot be shifted quickly without compromising contracts, quality and value for the consumer. In many cases, there are few if any realistic alternative sources that can be pursued without significant supply chain disruption and increased costs. It's far

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<sup>1</sup> <https://www.securityindustry.org/member-resources/reports-publications/security-industry-economic-impact-report/>

more likely that U.S. security businesses and their customers will simply be forced to pay more, which affects business growth and consumer demand.

The impact will be amplified for security integrators, which may have little ability to absorb the cost of increased tariffs, alter supplier arrangements, or to pass additional costs on to consumers. The vast majority of these companies are small businesses that compete fiercely for business within their region. Together they provide thousands of skilled workers with good paying jobs, selling and installing equipment that helps protect the lives, homes and businesses of those in their community. Imposing significant cost increases on products they commonly use could force many of these small companies out of business, costing middle class jobs across the United States.

Notably, security equipment plays an important role in supporting significant Administration priorities. Identity protection and management solutions, access control, camera systems, and robotics are vital elements of a border security strategy envisioned by President Trump. Consumers need access to alarm and camera systems and fire prevention and alert devices to keep their homes safe. Local law enforcement officials need access to life safety devices and other security technology products in their mission to ensure public safety threats are dealt with on a variety of fronts, including combatting illicit drug trafficking.

SIA is encouraged by the Administration's decision to establish a precedent of limited exemptions as it rectifies trade practices that contribute to large and persistent annual United States goods trade deficits<sup>2</sup>. We are further encouraged to see that the President maintains his own authority to "further modify the Harmonized Tariff Schedule of the United States (HTSUS) to decrease or limit in scope the duties imposed under this order"<sup>3</sup>. We recommend that the Administration carefully consider the importance of protecting certain products from universally applied tariffs, especially when those products contribute significantly to the American economy and the protection of public safety in the United States.

In both current and future tariff actions, we respectfully urge the Administration to formulate a process that allows companies to apply for security product-specific exclusions. We believe that it is in the best interest of the United States to take such action granting the security industry relief from the uncertainty surrounding trade policies and contributing to an environment that allows an important business sector to thrive in the United States. **Therefore, we respectfully request that, at the bare minimum, the specific HTSUS subheadings listed in the addendum attached to this letter be subject to a secondary rate of duty that does not include any additionally imposed tariffs.**

We thank you for your thoughtful consideration of this letter and our request for tariff exemptions for the security industry. SIA and its members stand ready to provide any additional information you and your staff may need as you consider these issues.

Respectfully Submitted,



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<sup>2</sup> <https://www.federalregister.gov/d/2025-06063/p-30>

<sup>3</sup> <https://www.federalregister.gov/d/2025-06063/p-43>



## Addendum

We respectfully request that the specific HTSUS subheadings listed and described below be exempt from any tariffs imposed on top of rates existing prior to February 4, 2025.

### Security Systems

HTSUS Subheading	Product Description
<b>8531.10.00</b>	<b>Burglar or fire alarms and similar apparatus</b>

Often combined within an integrated security system, burglar and fire alarms are one of the largest product segments used by security, safety and facility management practitioners. Intrusion detection and fire protection form a baseline for securing facilities, across government, commercial and residential sectors. Products imported in this category also include motion detectors, smoke detectors and fire alarm pull stations.

HTSUS Subheading	Product Description
<b>8537.10.91</b>	<b>Other boards, panels, consoles, desks, cabinets, etc., equipped with apparatus for electric control, for a voltage not exceeding 1,000 V</b>

Imported under this subheading are security system control panels.

HTSUS Subheading	Product Description
<b>8523.21.00</b>	<b>Cards incorporating a magnetic stripe</b>
<b>8523.52.00</b>	<b>Semiconductor media: "smart cards"</b>
<b>8471.60.90</b>	<b>Other input or output units of automatic data processing machines and units thereof, nesoi</b>

Most U.S. businesses and organizations use smart cards as well as “mag-stripe” cards and readers for time & attendance and physical access control systems

Smart cards are not included in the current semiconductor tariff exemption.<sup>1</sup> Generally, this category includes any small plastic cards with embedded integrated circuits. While there are a variety of uses ranging from financial transactions to telecommunications, in security systems such cards are used for personal identification, authentication and access control.

Physical security (and network security) applications require smart card readers for authentication and access control. Readers are included in the broader category HTSUS subheading 8471.60.90. While these products are currently exempt from reciprocal tariffs under the broader 8471 HTSUS category<sup>2</sup>, we want to emphasize their importance in the security industry and advocate for this subheading to continue to receive exempt status.

<sup>1</sup> [https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wgt\\_ref=USDHSCBP\\_WIDGET\\_2](https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wgt_ref=USDHSCBP_WIDGET_2)

<sup>2</sup> Ibid



HTSUS Subheading	Product Description
<b>8534.00.00</b>	<b>Printed circuits</b>

Products imported under this category are used for manufacturing a wide variety of security products in the industrial, residential and do-it-yourself (DIY) security market segments.

HTSUS Subheading	Product Description
<b>8471.80.40</b>	<b>Units suitable for physical incorporation into automatic data processing machines</b>

Security products impacted the most from additional tariffs in this category are components of residential and DIY security systems using small single-board microcomputers. While these products are currently exempt from reciprocal tariffs under the broader 8471 HTSUS category<sup>3</sup>, we want to emphasize their importance in the security industry and advocate for this subheading to continue to receive exempt status.

HTSUS Subheading	Product Description
<b>8518.90.81</b>	<b>Other parts of microphones &amp; stands, loudspeakers, headphones &amp; earphones, audio-frequency electric amplifiers, and electric sound amplifier sets</b>
<b>8518.40.20</b>	<b>Audio-frequency electric amplifiers, other than for use as repeaters in line telephony</b>

Use of audio components in the manufacture of electronic security products are increasingly important with the use of IP audio technology and related analytics, as well as public address and emergency communications.

HTSUS Subheading	Product Description
<b>7407.10.50</b>	<b>Refined copper bars and rods</b>
<b>7408.11.30</b>	<b>Refined copper wire, with a maximum cross-sectional dimension over 9.5 mm</b>
<b>7411.10.10</b>	<b>Refined copper seamless tubes and pipes</b>

Virtually all security solutions depend at least in part on physical network infrastructure, which is important considering the increasing dependence on higher CAT 6A and 7 cables for power-over-ethernet (POE). POE reduces overall installation costs and allows connected security devices to be more efficient and effective. These advanced cables require more copper to fabricate, so an increase in the cost of refined copper inputs will ultimately increase the unit installed cost of security sensors. While these HTSUS subheadings are included among the refined copper products currently exempt from reciprocal tariffs<sup>4</sup>, we want to emphasize their importance in the security industry and advocate for this subheading to continue to receive exempt status.

<sup>3</sup> [https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wgt\\_ref=USDHSCBP\\_WIDGET\\_2](https://content.govdelivery.com/bulletins/gd/USDHSCBP-3db9e55?wgt_ref=USDHSCBP_WIDGET_2)

<sup>4</sup> <https://www.whitehouse.gov/wp-content/uploads/2025/04/Annex-II.pdf>



HTSUS Subheading	Product Description
<b>8531.20.00</b>	<b>Indicator panels incorporating liquid crystal devices (LCD's) or light emitting diodes (LED)</b>
<b>8531.90.15</b>	<b>Printed circuit assemblies of the panels of subheading 8531.20</b>
<b>8531.90.30</b>	<b>Printed circuit assemblies of electric sound or visual signaling apparatus, other than those of heading 8512 or 8530</b>
<b>8531.90.75</b>	<b>Parts of the panels of subheading 8531.20, other than printed circuit assemblies</b>
<b>8531.90.90</b>	<b>Parts of electric sound or visual signaling apparatus, nesoi</b>

Many security products, particularly emergency notification and communications systems, incorporate LCD or LED screens and indicators and well as analog and network horns and speakers, and horn/strobe signaling devices within their product range. Products imported under the categories above also include motion detectors for residential and commercial security systems, motion detectors for unlocking emergency exit doors, input devices for intrusion detection system control panels, dual path IP/cellular and ethernet communications devices for control panels.

HTSUS Subheading	Product Description
<b>8507.20.80</b>	<b>Lead-acid storage batteries other than of a kind used as the primary source of electrical power for electrically powered vehicles of subheadings 8703.40, 8703.50, 8703.60, 8703.70 or 8703.80</b>

Lead-acid batteries are used extensively to power or provide backup power for burglar and fire alarm systems.

HTSUS Subheading	Product Description
<b>8479.50.00</b>	<b>Industrial robots, not elsewhere specified or included (nesoi)</b>
<b>8479.90.95.96</b>	<b>Other parts of machines and mechanical appliances having individual functions, nesoi</b>

These subheadings cover critical autonomous security solutions that are at the cutting edge of the security sector technologies.



## Security Cameras

HTSUS Subheading	Product Description
<b>8525.00.00</b>	<b>Transmission apparatus for radio-broadcasting or television, whether or not incorporating reception apparatus or sound recording or reproducing apparatus; television cameras, digital cameras and video camera recorders</b>
<b>8521.00.00</b>	<b>Video recording or reproducing apparatus, whether or not incorporating a video tuner</b>

These categories include security cameras for government, business and residential use. The increasing affordability and recent technological advances in video surveillance systems have made the benefits of these essential security and public safety systems available to more consumers throughout the public and private sectors.

HTSUS Subheading	Product Description
<b>9002.11.60</b>	<b>Mounted objective lenses suitable for use in closed-circuit television cameras, separately imported with or without attached electrical or non-electrical closed-circuit television camera connectors, and with or without attached motors</b>
<b>9002.90.85</b>	<b>Mounted lenses (other than objective lenses) suitable for use in closed-circuit television cameras, separately imported with or without attached electrical or non-electrical closed-circuit television camera connectors, and with or without attached motors</b>

For U.S. manufacturers, lenses are critical components of security cameras that are available from a very limited number of sources globally. These are the two primary product categories for these components.

HTSUS Subheading	Product Description
<b>8516.80.00</b>	<b>Electric heating resistors assembled only with simple insulated former and electrical connectors, used for anti-icing or de-icing</b>
<b>8516.80.80</b>	<b>Electric heating resistors, nesoi</b>

These categories encompass products that are used by U.S. manufacturers of camera housings and other control enclosures used in video surveillance systems.

HTSUS Subheading	Product Description
<b>8507.60.00</b>	<b>Lithium-ion batteries</b>
<b>8517.62.00</b>	<b>Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus</b>

Batteries and radios, as covered by these two HTSUS subcategories, are critical components in modern video surveillance systems.



### **Locks and other Door Hardware and Equipment**

HTSUS Subheading	Product Description
<b>8301.40.60</b>	<b>Base metal locks, including locks for doors, locksets, and electronic locks, other than padlocks</b>
<b>8301.60.00</b>	<b>Base metal parts of locks, including parts of padlocks</b>
<b>8302.10.60</b>	<b>Base metal iron or steel, aluminum, or zinc hinges, and parts thereof, not designed for motor vehicles</b>
<b>8302.41.60</b>	<b>Base metal iron or steel, aluminum, or zinc mountings, fittings and similar articles, and parts thereof suitable for buildings, nesoi</b>
<b>8302.41.90</b>	<b>Base metal (other than iron or steel, aluminum, or zinc) mountings, fittings and similar articles, and parts thereof suitable for buildings, nesoi</b>
<b>8302.60.30</b>	<b>Base metal automatic door closers</b>
<b>8302.60.90</b>	<b>Base metal parts of automatic door closers</b>
<b>8517.62.00</b>	<b>Machines for the reception, conversion and transmission or regeneration of voice, images or other data, including switching and routing apparatus</b>

These are categories of basic door hardware and door components essential to physical access control and used widely in construction and retrofits in buildings throughout the country, including door locks and electronic door locks and lock parts. Products in the 8302 categories are commodities – hinges, door pulls, mountings, etc. – that have longstanding global supply chains. Subheading 8302.41.60 includes non-keyed door locks (such as privacy or passage locks), doorstops, door pulls, and mountings and fittings for doors. Subheading 8517.62 covers essential access control, intercom, gateways, and wireless alarm systems.



# THE ECONOMIC IMPACT OF THE SECURITY INDUSTRY



**SECURING  
THE NATION.  
SECURING  
PROSPERITY.**

## UNITED STATES



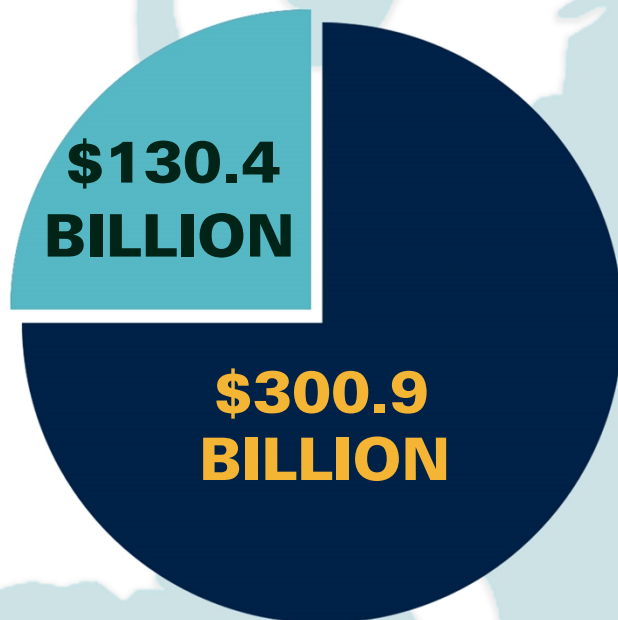
**2.1 MILLION**  
TOTAL JOBS

**\$145.5  
BILLION**  
IN WAGES

**\$60.1  
BILLION**  
TAX  
CONTRIBUTION

**\$69,200**  
AVERAGE  
WAGE  
PER EMPLOYEE

**\$431.4 BILLION**  
TOTAL ECONOMIC IMPACT



### SECURITY INDUSTRY IMPACT - NATIONWIDE

**MANUFACTURING**  
\$24.2B IMPACT  
**43,123 JOBS**

**B TO B SALES**  
\$69.4B IMPACT  
**190,583 JOBS**

**SECURITY SERVICES**  
\$36.8B IMPACT  
**489,038 JOBS**

**SECURITY  
EQUIPMENT  
SERVICES**

\$11.8B IMPACT  
**105,753 JOBS**

**SECURITY  
PERSONNEL  
SERVICES**

\$25.1B IMPACT  
**383,285 JOBS**

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