



Trade Agreement Act of 1979

An Act to approve and implement the trade agreements negotiated under the Trade Act of 1974, and for other purposes.

Enacted by the [96th United States Congress](#)

Effective July 26, 1979

Codification

Titles amended [19 U.S.C.: Customs Duties](#)

[U.S.C. sections created](#) [19 U.S.C. ch. 13 § 2501 et seq.](#)

What is TAA compliance;

A product is TAA compliant if:

- At least 50% of its overall manufacture cost originates from the US or designated countries.
- The product has undergone substantial transformation in the US or designated countries.

PENSAR LED TAA application for compliance

In May 2018 Pensar LED began internal investigations for a US Customs & Border Protection application to determine and register its line of products for TAA compliance. The company engaged the legal services of an Arlington VA., based law firm to prepare the legal arguments for CBP application for eligibility of its fine pitch panel products for government purchase and determine the county of origin.

On Oct 3, 2018 the company electronically filed its application for an Advisory Ruling for the country of origin with the Homeland Security Department, US Customs & Border Protection Division. The file was received and given the case number; OT: RR: CTF:VS H301774 ttnf.

Over the subsequent months, the application was reviewed for compliance of all required relevant support documents and materials before moving to the next stage in the ruling process. No deficiencies in material facts were presented to the company for additional clarification purposes. In December of 2018 the Federal government shut down suspended the continuation of the CBP ruling review.

On November 19, 2019 Pensar LED received the CBP Advisory ruling from the company's legal team. Advisory rulings are not published in the Federal Registry but are maintained within CBP file records

The summation of the CBP ruling is listed below.

“Based on the information provided, and the analysis set forth above, the imported components of the subject LED video wall panels are not substantially transformed during the assembly process in China or post-importation in the U.S. Therefore, we find the country of origin for the Pensar LED Video Wall Panels is Taiwan, the country where four of the seven LED panel components are made.”

Sincerely,
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Monika Brenner, Chief
Valuation and Special Programs Branch