June 26, 2026

Via EDIS

Lisa R. Barton
Secretary
International Trade Commission
Washington, DC 20436

Re: ITC Docket No. MISC-051 - *Section 337 Adjudication and Enforcement*

Dear Secretary Barton,

The Computer & Communications Industry Association ("CCIA"),[1] appreciates the opportunity to provide comments to the Notice of Proposed Rulemaking issued by the U.S. International Trade Commission ("ITC" or "Commission").[2] CCIA strongly supports the Commission's proposal to amend its Rules of Practice and Procedure for Section 337 investigations to increase transparency regarding third-party litigation funders and other third-party entities.

CCIA believes that the Commission's efforts to facilitate greater transparency are urgently needed to detect conflicts of interest, clarify the entities whose rights are truly at issue, protect sensitive confidential information, and prevent speculative or foreign entities from weaponizing the threat of Commission exclusion orders from the shadows. In addition to supporting the proposed rules, we respectfully urge the Commission to adopt the modest improvements suggested in our comments.

CCIA's members are owners, licensors, and licensees of U.S. intellectual property, and several of our members have been complainants and respondents in a number of Section 337 investigations. Our interest in filing these comments is to ensure that the Commission is informed and has the broad, balanced perspective that we and our members are able to provide with respect to practice before the ITC in these important cases.

CCIA appreciates the opportunity to participate in this proceeding and is available to provide any additional information that might be helpful to the Commission.

Respectfully submitted,

J. John Lee

[1] CCIA is an international nonprofit membership organization representing companies in the computer, Internet, information technology, and telecommunications industries. Together, CCIA's members employ nearly half a million workers and generate approximately one quarter of a trillion dollars in annual revenue. CCIA promotes open markets, open systems, open networks, and full, fair, and open competition in the computer, telecommunications, and Internet industries. A complete list of CCIA members is available at http://www.ccianet.org/members.

[2] ITC Docket No. MISC-051, "Section 337 Adjudication and Enforcement" Notice of Proposed Rulemaking, (April 30, 2026), published at 91 Fed. Reg. 23190, (the "NPRM").

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June 26, 2026

Before the
United States International Trade Commission
Washington, D.C.

In re Section 337 Adjudication and Enforcement	Docket No. MISC-051

COMMENTS OF
THE COMPUTER & COMMUNICATIONS INDUSTRY ASSOCIATION (CCIA)

In response to the Commission's Notice of Proposed Rulemaking ("proposal"), published in the Federal Register at 91 Fed. Reg. 23,190 (April 30, 2026), the Computer & Communications Industry Association ("CCIA")[1] submits the following comments in strong support of the U.S. International Trade Commission ("Commission") proposal to increase transparency regarding third-party litigation funding.

I. The Growth of Modern Litigation Warrants Enhanced Disclosure Requirements

The Commission's Notice outlines amendments to its Rules of Practice and Procedure for Section 337 investigations that promote greater transparency and fairness. CCIA strongly supports the adoption of such amendments. As the Commission noted in the Notice, greater transparency would facilitate the ability of the Commissioners, the Administrative Law Judges (ALJs), and Commission employees to detect conflicts of interest, clarify the entities whose rights are at issue, facilitate settlements, and bring latent but relevant issues to the Commission's attention.[2] In addition, greater transparency would minimize and deter misconduct and gamesmanship, help protect confidential information and trade secrets, and guard against manipulation by foreign entities and governments.

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[2] Section 337 Adjudication and Enforcement, 91 Fed. Reg. 23,190, 23,191 (Apr. 30, 2026).

A. Litigation Finance Has Changed Considerably in Recent Years

Although third-party financing of litigation is not a new phenomenon, changes in how third-party financing is conducted over the past decade have given rise to significant new challenges, which make the Commission's proposed rule both timely and urgent. Traditional forms of litigation financing include bank loans and contingency fee arrangements, where a party's counsel agrees to self-finance the litigation in exchange for a share of any proceeds of the case(s) in which they are providing legal representation.[3]

Modern litigation finance, however, is a dedicated multi-billion dollar industry featuring sophisticated investment entities with enormous sums under management.[4] Unlike in traditional litigation financing, these entities seek to invest large sums of money with the expectation of a substantial return on that investment—thus, their primary objective is generating a return on investment rather than advancing the underlying legal interests of a complainant.[5] In addition, these investment entities often finance entire portfolios of cases, rather than a single case, such as by targeting a group of related cases (e.g., cases asserting the same group of patents against multiple defendants/respondents).[6] Rather than a conventional interest rate arrangement based on the creditworthiness of the borrower, modern litigation finance is focused on the merits of the cases themselves, the defendants targeted and their available resources (including insurance), the expected litigation costs, the skill and track record of the lawyers, leverage that could be gained for settlement negotiations (e.g., via remedial measures), and the potential for a monetary windfall via a settlement (or damages award, if a district court case).[7]

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[3] *The U.S. Intellectual Property System and the Impact of Litigation Financed by Third-Party Investors and Foreign Entities Before the Subcomm. on Courts, Intell. Prop., and the Internet of the H. Comm. on the Judiciary*, 118th Cong. 2-3 (June 12, 2024) (statement of Donald J. Kochan) ("Kochan Testimony").

[4] U.S. GOV'T ACCOUNTABILITY OFFICE, GAO-23-105210, THIRD-PARTY LITIGATION FINANCING: MARKET CHARACTERISTICS, DATA, AND TRENDS 11-12 (2022) ("GAO TPLF Report").

[5] Donald J. Kochan, *Keeping Foreign Cash Out of U.S. Courts*, WALL ST. J. (Nov. 24, 2022); *The U.S. Intellectual Property System and the Impact of Litigation Financed by Third-Party Investors and Foreign Entities Before the Subcomm. on Courts, Intell. Prop., and the Internet of the H. Comm. on the Judiciary*, 118th Cong. 1 (June 12, 2024) (statement of the Hon. Bob Goodlatte); *see also Unsuitable Litigation: Oversight of Third-Party Litigation Funding Before the H. Comm. on Oversight and Accountability*, 118th Cong. 1-2 (Sept. 11, 2023) (statement of Aviva Wein).

[6] U.S. Chamber of Com. Inst. for Legal Reform, *What You Need to Know About Third Party Litigation Funding* (June 7, 2024), https://instituteforlegalreform.com/what-you-need-to-know-about-third-party-litigation-funding/ ("ILR TPLF Primer"); GAO TPLF Report, *supra* note 4, at 8-9.

[7] GAO TPLF Report, *supra* note 4, at 8-10.

Data on the size and scope of the third-party litigation finance industry is sparse because most tribunals in the United States do not yet have disclosure requirements, and most third-party litigation funding arrangements are confidential.[8] Indeed, the lack of available data is itself another good reason to adopt the Commission's proposed rule.[9] However, the U.S. Government Accountability Office issued a report in 2022 indicating that, as of 2021, at least 47 active commercial litigation funders were operating in the United States with over $12 billion in assets under management.[10] These funders increasingly focused on investing in portfolios of cases rather than individual cases, with nearly 60 percent of new litigation funding deals being portfolio investments.[11] In 2021 alone, these funders had committed nearly $3 billion to new litigation funding agreements.[12] This represented an 11 percent increase from the previous year.[13] One example of this new breed of litigation financier is Burford Capital, the world's largest publicly-traded litigation finance firm, which had a $7 billion total litigation portfolio as of FY 2023.[14] In that one year alone, Burford reported that its consolidated revenues tripled.[15] As such, not only is the nature and type of litigation finance changing, the size and impact of the modern third-party litigation finance industry is growing rapidly.

B. Greater Transparency Is Vital to Detect Conflicts of Interest and Hidden Issues

Under 19 C.F.R. Part 200, the Commissioners and other employees of the Commission are charged to uphold high ethical standards, including avoiding real or perceived conflicts of interest.[16] This includes, for example, avoiding accepting gifts or favors from any person that has "interests that may be substantially affected" by the employee's official duties, and avoiding having financial interests (e.g., personal investments) that conflict with the employee's duties.[17] Ensuring that these standards are met requires the Commission to have the information it needs

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[8] Kochan Testimony, *supra* note 3, at 4-5.
[9] GAO TPLF Report, *supra* note 4, at 15-17.
[10] *Id.* at 11-12.
[11] *Id.*
[12] *Id.*
[13] *Id.*
[14] Justin Henry, *Litigation Funder Burford Capital Sees Fiscal 2023 Revenue Triple, Reaching $1.1B*, AM. LAW. (Mar. 15, 2024), https://www.law.com/americanlawyer/2024/03/14/revenues-triple-at-largest-public-litigation-funder-as-earnings-per-share-grow-19x/.
[15] *Id.*
[16] 19 C.F.R. Part 200.
[17] 19 C.F.R. §§ 200.735-105, 200.735-107.

to determine whether individuals or entities are related to the Commission's work. As third-party litigation finance becomes more prevalent, the scope of such individuals or entities is expanding. A third-party funder who has a contractual right to a share of any settlement reached in a particular Section 337 investigation certainly has an interest in the outcome of that investigation. As such, the Commission and its employees working on the investigation must be aware of that entity—and the major investors behind it—to responsibly assess their obligations under the Commission's ethics rules.

In addition to the Commission's need to assess its own potential conflicts of interest, transparency is also crucial to the Commission's ability to assess and address potential conflicts of interest between third-party funders and the parties they are funding. As discussed above, the interests of third-party financiers lie in maximizing the return on their investment in the case (or the litigation portfolio it is a part of). That interest, however, may conflict with the interests of the funded party.[18] For example, a complainant in a bona fide commercial dispute may be satisfied with settlement terms that protect its domestic industry investments against unfair competition from the respondent's infringing products, but that settlement may not include financial terms that meet the third-party funder's expectations. Or a complainant may not wish to settle a case because they believe they are entitled to an exclusion order to prevent the respondent's goods from entering the United States, but their funder may prefer a quick monetary settlement because an exclusion order on its own has no financial value to the funder.

Such conflicts also create significant due process and other challenges for respondents, as they affect the conduct of the parties during an investigation. For example, a complainant and its funder may differ on which imported products they wish to accuse of infringement. Or, if the funder is investing in a portfolio of cases (which may have different complainants or plaintiffs), the funder may disagree with certain legal positions a complainant wishes to take because they may be inconsistent with, or disadvantageous in, other Section 337 investigations or district court cases in its litigation portfolio. These differences could also affect positions taken on discovery, evidentiary, and procedural issues. Without knowing about the third-party funders and their potentially divergent interests, the ALJ and the staff attorney from the Office of Unfair Import

[18] *The U.S. Intellectual Property System and the Impact of Litigation Financed by Third-Party Investors and Foreign Entities Before the Subcomm. on Courts, Intell. Prop., and the Internet of the H. Comm. on the Judiciary*, 118th Cong. 3-6 (June 12, 2024) (statement of Paul Taylor).

Investigations (OUII) would not have a full picture of the relevant issues and be unable to manage the investigation effectively.

These scenarios are not merely theoretical. Conflicts between parties and their third-party funders have been documented. Perhaps the most publicized such conflict was the situation between food distributor Sysco and its third-party funder, Burford, involving antitrust litigation brought by Sysco against various suppliers.[19] Burford provided $140 million in funding for the cases, which paid for the services of the law firm Boies Schiller.[20] According to Sysco, Burford blocked settlement agreements Sysco had negotiated with some of the defendants, contrary to Sysco's interests, because the financial terms were inadequate for Burford.[21] Despite repeated public statements denying control over litigation decisions in its cases, the Sysco dispute revealed that, in fact, Burford had the legal right to veto settlements written into its funding agreement with Sysco.[22] Sysco also divulged that its own counsel, Boies Schiller, advanced the interests of Burford (their payor) over Sysco (their client).[23]

Disclosure rules that promote transparency would ensure that the Commission is aware of potential conflicts of interest, whether their own conflicts or those between the third-party funder, the party it is funding, and the counsel paid with those funds.

C. Disclosure Rules Would Help Better Protect Sensitive Information

Although not mentioned in the Commission's Notice, another reason to adopt the proposed rule is that greater transparency will enable the parties and the Commission to better protect confidential information and trade secrets. Section 337 investigations often involve cutting edge technologies. Discovery often involves the exchange of highly sensitive information from proprietary technical designs and software to confidential business information, such as internal business plans and financial documents. The Commission is known for its careful treatment of sensitive information, including the issuance of a strict administrative protective

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[19] Alison Frankel, *Sysco sues litigation funder Burford, blasts Boies Schiller over $140 million soured deal*, REUTERS (Mar. 9, 2023), https://www.reuters.com/legal/legalindustry/sysco-sues-litigation-funder-burford-blasts-boies- schiller-over-140-million-2023-03-09/.
[20] *Id.*
[21] *Id.*
[22] *Id.*
[23] *Id.*

order (APO) in most cases and imposition of strict penalties for violations.[24] This is critical because discovery in a Section 337 investigation is broad.[25] Although the base protections in most investigations are robust, the Commission allows for modifications of APOs to add additional security measures when warranted.

The type and scope of protections desired by a party to protect its confidential information may be affected by the identity of the opposing party or parties. For example, a party may wish to seek additional protections, or limitations on discovery, before producing proprietary source code or highly sensitive financial information to a direct competitor, or to a party or counsel that has violated protective orders or other orders in the past, perhaps in another venue. Similar considerations also apply to third-parties, who themselves could be competitors or entities advancing the interests of competitors. Even more pernicious would be foreign governmental actors with motives beyond merely profit, such as targeting U.S. technology or manufacturing leaders to further their own national security interests or the interests of their own firms, including state-owned enterprises.[26] Without knowing that such entities are involved in an investigation, the other parties may not know about risks to their sensitive information, and the ALJ would not be able to weigh such factors in their decisions on a motion to amend the APO, motions to compel discovery, or when considering public interest factors.

These considerations, again, are not merely theoretical, and documented cases of such gamesmanship exist. For example, in a patent infringement case filed by Synergy IP and Staton Techiya against Samsung in the U.S. District Court for the Eastern District of Texas, Judge Gilstrap ultimately sanctioned the plaintiffs and dismissed the case for a litany of offenses, including sharing the defendant's confidential information with their third-party litigation funder, a Chinese entity called PurpleVine IP with potential links to the Chinese Communist Party.[27] Greater transparency would not only help parties protect themselves, but it could also help detect

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[24] *See* 19 C.F.R. §§ 201.6, 210.34.

[25] *See* 19 C.F.R. § 210.27(b).

[26] *See generally* U.S. CHAMBER OF COM. INST. FOR LEGAL REFORM, A NEW THREAT: THE NATIONAL SECURITY RISK OF THIRD PARTY LITIGATION FUNDING 3 (2022), https://instituteforlegalreform.com/wp-content/uploads/2022/11/TPLF- Briefly-Oct-2022-RBG-FINAL-1.pdf.

[27] Rob Harkavy, *Judge slams claimant in Samsung patent suit*, ICLG NEWS (May 29, 2024), https://iclg.com/news/20745-judge-slams-claimant-in-samsung-patent-suit; Debra Cassens Weiss, *Scheme by former Samsung lawyers was 'dishonest, unfair, deceitful and repugnant,' judge says*, ABA J. (May 29, 2024), https://www.abajournal.com/news/ article/scheme-by-former-samsung-lawyers-was-dishonest-unfair-deceitful-and-repugnant-judge-says.

more misconduct and, perhaps most importantly, deter misconduct from happening in the first place by preventing key players in a Section 337 investigation from being able to stay hidden and operate in secret.

II. Modest Improvements on the Proposed Rules Would Enhance Their Effectiveness

CCIA supports the rule as proposed by the Commission.[28] Modest changes, however, would improve the rule to better serve the purposes set forth by the Commission and described above. We suggest the following:

A. § 210.14a(a), (a)(3), and (a)(3)(i)

The text of § 210.14a(a) and (a)(3), as proposed, imposes a disclosure requirement on any "nongovernment party" but excludes from that disclosure information relating to "counsel representing the party in the investigation."[29] As discussed above, however, many third-party funding agreements lie with counsel, rather than the party directly, and in many cases, the counsel for the party acts in the best interest of the third-party funder, rather than the client party. In fact, it is possible that the party itself could be unaware of the involvement of the third-party funder, since the funder may only deal with counsel, particularly in the case of portfolio investments where multiple cases with different client parties are involved.[30] As such, the current language may allow third-party financiers to escape disclosure by working exclusively with counsel rather than parties directly. For example, a third-party funder could provide funds generally to counsel, and then counsel could provide funds to a party, which the counsel could represent as two unrelated transactions—i.e., that the funding for the investigation came from "counsel representing the party in the investigation" and, thus, need not be disclosed.

Additionally, the text of § 210.14a(a)(3)(i) would apply only to funding "specifically for the section 337 investigation," and exclude loans or insurance.[31] However, portfolio investments may be interpreted as not "specifically for the section 337 investigation" because the funding is provided for a group of cases, not for any single case. Moreover, it is possible for a third-party

[28] 91 Fed. Reg. 23,193-194.
[29] *Id.*
[30] ILR TPLF Primer, *supra* note 5.
[31] 91 Fed. Reg. 23,193.

funder to characterize its investment as a "loan" or "insurance"—e.g., a loan with 200 percent interest or other commercially unusual terms—to evade the current language of this provision.

As such, CCIA suggests that § 210.14a(a) be modified to read:

> (a) Each nongovernment party to, or a nongovernment party who seeks to intervene, in a section 337 investigation shall file with the Secretary a disclosure statement that identifies***, to the knowledge of the party and the counsel representing the party***:

In addition, CCIA suggests that § 210.14a(a)(3) be modified to read:

> (3) Any person or entity, not including counsel representing the party in the investigation:
>
> (i) That provides funding***, to the party or the counsel representing the party,*** ~~specifically~~ for the section 337 investigation ***or a group of litigation cases including the section 337 investigation***, not including personal loan(s), bank loans, or insurance ***with terms that would be commercially reasonable in a non-litigation context***….

B. § 210.14a(a)(1)

The text of § 210.14a(a)(1) currently excludes "natural person(s)" and focuses solely on formal stock ownership.[32] This provision would, thus, allow third-party funders to escape disclosure through gamesmanship of corporate structures, such as using proxy individuals and shell company intermediates. Moreover, most of the same concerns described above with undisclosed third-party financiers would apply equally to financiers who are natural persons. To prevent this issue and ensure real transparency, the Commission should adopt a ten percent materiality threshold consistent with federal civil rules on beneficial ownership.[33] Such a rule would avoid unnecessary disclosure of all stockholders while preventing gamesmanship. CCIA suggests that § 210.14a(a)(1) be modified to read:

[32] *Id.*
[33] *See* Fed. R. Civ. P. 7.1(a)(1).

(1) Any parent corporation**,** and ***any*** entity~~, not including~~ ***or*** natural person(s)~~,~~ ***directly or indirectly*** owning ***or controlling 10 percent or more of the party's*** ~~its~~ stock or equity interests, including direct or indirect beneficial ownership;

C. § 210.14a(a)(3)(ii)

The text of § 210.14a(a)(3)(ii) requires disclosure only for entities "[w]hose approval is necessary for litigation decisions or settlement decisions in the section 337 investigation."[34] As discussed above, third-party funders who fail to conceal contractual authority over litigation or settlement decisions, or do not have other contractual terms to protect such authority from being revealed, can find themselves exposed or subject to legal action. As a result, third-party funders may rely on undocumented or unofficial influence or authority, such as its financial ties to counsel, to control a 337 investigation.[35] As such, the language should be broadened to encompass other types of authority.

Therefore, CCIA suggests that § 210.14a(a)(3)(ii) be modified to read:

(ii) ***Who is to be consulted or whose explicit or implicit*** approval is necessary for litigation decisions or settlement decisions in the section 337 investigation….

D. § 210.14a(b)

The text of § 210.14a(b) specifies the information required to be disclosed, but limits the disclosure to only undocumented assertions of "identity, business address, and if a legal entity, place of formation."[36] Such limited information would be insufficient to serve the purposes for which the proposed rule is contemplated. For example, without knowing the nature of the financial interest or influence the disclosed entity has on the party at issue, the Commission could not determine whether the disclosed entity is relevant only to financial conflict of interest issues (e.g., due to an employee's personal investments) or presents other risks described above (e.g., potential conflicts between the funder and the party, settlement-related concerns, foreign

[34] *Id.*
[35] GAO TPLF Report, *supra* note 4, at 21; ILR TPLF Primer, *supra* note 5.
[36] *Id.*

involvement, risks relating to confidential information). Additionally, given the high stakes and size of investments involved, the Commission should require the production of the actual agreements and contract documents governing the funding to ensure that the disclosures are accurate and truthful. Concerns about the disclosure of confidential or privileged information can be addressed by ALJs through well-established procedures, such as APOs and in camera review. CCIA suggests that § 210.14a(b) be modified to read:

> (b) For each corporation, entity, or person identified, include the identity, business address, and if a legal entity, place of formation***, as well as a description of the nature of the interest, right, control, or other influence the corporation, entity, or person holds, and production of any agreement creating, modifying, or governing the interest, right, control, or other influence.***

E. Duty to Supplement

The Commission's proposal sets forth disclosures that are required at certain specific occasions in a Section 337 investigation. To ensure that necessary disclosures are not evaded simply by timing funding agreements to avoid those occasions, CCIA suggests adding a duty to supplement disclosures, such as:

> ***(d) Said party shall file with the Secretary within one week a revised disclosure statement if, at any time during the section 337 investigation, a change in circumstances occurs that would render a filed disclosure statement materially incomplete or inaccurate.***

F. Definition of "Nongovernment Party"

The proposed rule only applies to "nongovernment part[ies]," but this limitation may inadvertently exempt a variety of entities affiliated with a government that present many or all of the concerns described above. For example, entities affiliated with foreign governments, such as sovereign wealth funds, may implicate national security concerns by supporting litigation (including Section 337 investigations) that benefits state-owned enterprises targeting U.S. technology and manufacturing leaders. Allowing these entities to claim a "government"

exemption could weaponize the Commission's exclusion orders against U.S. businesses without public scrutiny.[37] Furthermore, as discussed above, allowing foreign state-linked entities to remain hidden undermines the Commission's ability to protect sensitive confidential information and trade secrets during discovery. Consequently, CCIA suggests adding the following provision:

> ***(e) For purposes of this section, "nongovernment party" includes any party that is not a United States federal, state, or local government agency, department, unit, or instrumentality.***

G. Public Filing

The Commission's proposal currently does not specify whether the required disclosures will be public or may be hidden under, for example, 19 C.F.R. § 201.6. Public visibility is essential to allow parties to detect potential misconduct or gamesmanship by third-party financing entities because such misconduct or gamesmanship may only become apparent by reviewing the entities' involvement in prior Section 337 investigations. In addition, restricting even basic information about a third-party financier from visibility outside of a particular investigation could hamper the Commission's ability to detect and respond to potential misconduct or gamesmanship, particularly considering that most financing entities engage in portfolio investing across multiple cases. To the extent that specific commercially-sensitive terms of a contract may warrant treatment as confidential business information, for example, applicable protections should only apply to those portions of the relevant contract or other document to prevent evasion by inserting confidential information simply to shield entire documents. As a result, CCIA suggests adding a duty to supplement disclosures, such as:

> ***(f) Disclosure statements filed pursuant to this section shall be filed as public documents and shall not be subject to confidential treatment under § 201.6 of this chapter, except that a party may request confidential treatment for specific terms or portions of any agreement produced under subsection (b), provided that all***

[37] *See* Madison D. Gonzalez, *Transparency in Third-Party Litigation Funding: A Pathway to Protect America's National Security Interests*, 75 Cath. U. L. Rev. ___ (2025) (arguing that foreign adversaries may "weaponize" undisclosed third-party litigation funding to advance strategic interests against U.S. companies and that disclosure requirements are necessary to address those risks).

other information disclosed or produced under subsection (b) is filed as public.

H. Penalty for Non-Compliance

The Commission's proposal currently does not specify penalties for non-compliance. Without an effective enforcement mechanism, sophisticated actors may risk evasion rather than reveal hidden financial interests. Although the Commission has broad authority to sanction improper conduct in a Section 337 investigation,[38] more explicit authority may be needed to impose penalties for violations of this rule in that the relevant misconduct may involve entities who are not parties to the investigation for acts that occurred before the investigation took place. As such, CCIA suggests adding the following provision:

(g) In addition to any other applicable sanctions, the Commission or the administrative law judge may issue sanctions for failure to comply with the requirements of this section, including dismissal of the complaint or entry of default judgment.

III. Conclusion

CCIA strongly supports the Commission's proposal to require third-party litigation funding disclosure in Section 337 investigations. Greater transparency is urgently needed to detect conflicts of interest, clarify the entities whose rights are truly at issue, protect sensitive confidential information, and prevent speculative or foreign entities from weaponizing the threat of Commission exclusion orders from the shadows. While the Commission's proposed rules are a substantial and necessary step forward, CCIA respectfully urges the Commission to adopt the proposed rules with our modest but necessary improvements.

Respectfully submitted,

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[38] *See generally* 19 C.F.R. Part 210.

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