



HQ H345634

December 16, 2025

OT:RR:CTF:CPMMA H345634 DCC

CATEGORY: Classification

TARIFF NO.: 8302.10.3000

Center Director
Automotive and Aerospace Center for Excellence and Expertise
U.S. Customs & Border Protection
477 Michigan Ave.
Detroit, MI 48226
Attn: Supervisory Import Specialist Mark Badger

RE: Request for Further Review of Protest No. 1803-25-102577; Tariff Classification of Certain Hinges

Dear Center Director:

This is in response to the Application for Further Review (AFR) of Protest No. 1803-25-102577, filed on February 18, 2025, by Jammy, Incorporated, (Jammy or Protestant), contesting U.S. Customs and Border Protection's (CBP) classification of certain door hinges for recreational vehicles (RVs) under the Harmonized Tariff Schedule of the United States (HTSUS). The Protest concerns one entry of merchandise that was made on October 16, 2024, and liquidated on December 13, 2024. Counsel for Jammy submitted a Memorandum in Support of Protest.

FACTS:

In the Memorandum in Support of Protest, counsel for Jammy describes the subject merchandise as follows:

The imported articles, identified as TALH Series hinges, are three and five leaf aluminum door hinges in raw and black finishes, designed for use on the entry doors of recreational vehicles. The five leaf version measures 7-3/4" long and weighs 0.32 pounds (lbs.) (5.12oz) each. The three leaf version measures 4-5/8" long and weighs 0.2 lbs. (3.2oz). A box of hinges contains 50 items. Each hinge is composed of three or five aluminum leaves, each leaf with stamped mounting

holes. Each hinge is imported with a stainless-steel hinge pin about which the hinge rotates, with each leaf separated by nylon washers.

In addition, the Protestant's product website, <https://jammyinc.com/product-category/leaf-door-hinges/> (last visited November 18, 2025), describes the subject merchandise as follows:

Three and Five Leaf Aluminium [sic] Door Hinges in Raw (R) and Black (B) Finishes. Designed for use on RV and Trailer Doors. Stainless hinge pin with nylon washers. Black version is E-Coat finish for longest outdoor durability. Five Leaf Version is 7-3/4" Long
Three Leaf Version is 4-5/8" Long
Each 3-Hole Leaf is 4mm (0.157") offset from 2-Hole Leaf to allow for fasteners.

In addition, the following table, available on Jammy's product website (last visited November 18, 2025), identifies the four models by part number:

Part No.	Description	Finish
TALH5B	5 Leaf Aluminum Door Hinge	Black
TALH5R	5 Leaf Aluminum Door Hinge	Raw Aluminum
TALH3B	3 Leaf Aluminum Door Hinge	Black
TALH3R	5 Leaf Aluminum Door Hinge	Raw Aluminum

In the Memorandum in Support of Protest, counsel for Jammy states that the TALH series hinges are used as entry door hinges for various vehicles, including motor vehicles, recreational vehicles, motorhomes, buses, campers, trailers, camper trailers, and towable travel trailers.

At the time of entry, the Protestant classified the hinges in subheading 8302.10.3000, HTSUSA (Annotated), subject to the column one general rate of duty of 2% *ad valorem*. Subheading 8302.10.3000, HTSUSA, provides for "Base metal mountings, fittings and similar articles . . . : Hinges, and parts thereof: Of iron or steel, of aluminum or of zinc: Designed for motor vehicles."

In a Notice of Action dated November 26, 2024, CBP notified Jammy that,

The correct HTSUS number for this merchandise is 8302.10.6090. This entry summary will be rate advanced and a bill will be issued upon liquidation. Line 002 will be edited to HTS 8302.10.6090 / 9903.88.03 with applied duty rate of 3.5% and Section 301 duties of 25%.

Subheading 8302.10.6090, HTSUSA, provides for "Base metal mountings, fittings and similar articles . . . : Hinges, and parts thereof: Of iron or steel, of aluminum or of zinc: Other: Other."

ISSUE:

Whether the TALH hinges are properly classified in subheading 8302.10.30, HTSUS, as hinges designed for motor vehicles, or in subheading 8302.10.60, HTSUS, as “other” hinges.

LAW AND ANALYSIS:

Initially, we note that the matter is protestable under 19 U.S.C. § 1514(a)(2) as a decision on tariff classification. Jammy timely filed the protest within 180 days from the date of liquidation for entries made on or after December 18, 2004. *See* Miscellaneous Trade and Technical Corrections Act of 2004, Pub. L. 108-429, § 2103(2)(B)(ii), (iii) (codified as amended at 19 U.S.C. § 1514(c)(3) (2006)). Further review of the protest is properly granted pursuant to 19 C.F.R. § 174.24(b) because the decision against which the protest was filed is alleged to be inconsistent with rulings by CBP and involve questions of law or fact which have not been ruled upon by the Customs courts.

Merchandise imported into the United States is classified under the HTSUS. The tariff classification of merchandise under the HTSUS is governed by the principles set forth in the General Rules of Interpretation (GRIs) and, in the absence of special language or context which otherwise requires, by the Additional U.S. Rules of Interpretation. The GRIs and the Additional U.S. Rules of Interpretation are part of the HTSUS and are to be considered statutory provision of law for all purposes. *See* Sections 1204(a) and 1204(c) of the Omnibus Trade and Competitiveness Act of 1988 (19 U.S.C. §§ 1204(a) and 1204(c)).

GRI 1 provides that classification shall be determined according to the terms of the headings of the tariff schedule and any relative section or chapter notes. When goods cannot be classified solely based on GRI 1, and if the headings and legal notes do not otherwise require, the remaining GRIs 2 through 6 may then be applied in order. GRI 6 provides that for legal purposes, the classification of goods in the subheadings of a heading shall be determined according to the terms of those subheadings and any related subheading notes and, *mutatis mutandis*, to the above rules, on the understanding that only subheadings at the same level are comparable.

Under GRI 1, “classification shall be determined according to the terms of the headings and any relative section or chapter notes.” *See Orlando Food Corp. v. United States*, 140 F.3d 1437, 1440 (Fed. Cir. 1998). “Absent contrary legislative intent, HTSUS terms are to be construed according to their common and commercial meanings, which are presumed to be the same. A court may rely upon its own understanding of the terms used and may consult lexicographic and scientific authorities, dictionaries, and other reliable information sources.” *Carl Zeiss, Inc. v. United States*, 195 F.3d 1375, 1379 (Fed. Cir. 1999) (internal citation omitted); *see also Rocknel Fastener, Inc. v. United States*, 267 F.3d 1354, 1356-57 (Fed. Cir. 2001).

The HTSUS subheadings under consideration are the following:

8302 Base metal mountings, fittings and similar articles suitable for furniture, doors, staircases, windows, blinds, coachwork, saddlery, trunks, chests, caskets or the

like; base metal hat racks, hat-pegs, brackets and similar fixtures; castors with mountings of base metal; automatic door closers of base metal; and base metal parts thereof:

8302.10 Hinges, and parts thereof:

Of iron or steel, of aluminum or of zinc:

8302.10.3000 Designed for motor vehicles.

8302.10.60 Other

8302.10.6090 Other.

The Harmonized Commodity Description and Coding System Explanatory Notes (“ENs”) constitute the official interpretation of the Harmonized System at the international level. Although neither legally binding nor dispositive, the ENs provide a commentary on the scope of each heading of the HTSUS and are generally indicative of the proper interpretation of these headings. *See* T.D. 89-80, 54 Fed. Reg. 35127, 35128 (August 23, 1989).

Explanatory Note (C) to Section XV provides as follows:

(C) PARTS OF ARTICLES

In general, identifiable parts of articles are classified as such parts in their appropriate headings in the Nomenclature.

However, parts of general use (as defined in Note 2 to this Section) presented separately are not considered as parts of articles, but are classified in the headings of this Section appropriate to them. This would apply, for example, in the case of bolts specialised for central heating radiators or springs specialised for motor cars. The bolts would be classified in heading 73.18 (as bolts) and not in heading 73.22 (as parts of central heating radiators). The springs would be classified in heading 73.20 (as springs) and not in heading 87.08 (as parts of motor vehicles).

The General EN for Chapter 83 states:

GENERAL

Whereas in Chapters 73 to 76 and 78 to 81 articles are classified according to a specific metal, this Chapter, like Chapter 82, covers certain particular classes of goods irrespective of the base metal of which they are composed.

In general, parts of base metal are to be classified with their parent articles (see Chapter Note 1). However, the Chapter does not cover springs (even if specialised for locks, etc.), chains, cables, nuts, bolts, screws or nails; these goods are classified in the appropriate headings of Chapters 73 to 76 and 78 to 81 (see Note 2 to Section XV and Note 1 to this Chapter).

In addition, EN 83.02 states in pertinent part:

This heading covers general purpose classes of base metal accessory fittings and mountings, such as are used largely on furniture, doors, windows, coachwork, etc. Goods within such general classes remain in this heading even if they are designed for particular uses (e.g., door handles or hinges for automobiles). The heading does not, however, extend to goods forming an essential part of the structure of the article, such as window frames or swivel devices for revolving chairs.

The heading covers:

Hinges of all types (e.g., butt hinges, lift-off hinges, angle hinges, strap hinges and garnets).

* * * *

Given the clear statutory provisions of the tariff code, a good that is a base metal mounting and fitting described by heading 8302, HTSUS, must be classified in that heading. The only question is whether at the 8-digit level, the hinges are properly classified in subheading 8302.10.30, HTSUS, as hinges designed for motor vehicles, or in subheading 8302.10.60, HTSUS, as “other” hinges.

Jammy cites six New York (NY) ruling letters concerning the classification of various vehicle components in subheading 8302.10.3000, HTSUSA. Specifically, Jammy cites the following ruling letters:

- NY N302830, dated March 26, 2019 (classifying steel hinge assembly for an automobile swing gate);
- NY N099304, dated April 1, 2010 (classifying carbon steel door hinge pin designed exclusively for use in an automobile door hinge);
- NY K80511, dated November 21, 2003 (classifying vehicle “door check” (hinge) for a pickup truck);
- NY F87137, dated May 23, 2000 (classifying stamped steel tailgate pivot brackets welded to steel tube section);
- NY E80929, dated April 22, 1999 (classifying half hinge made of aluminum alloy for vehicle fuel filler door); and
- NY N304443, dated June 18, 2019 (classifying zinc-coated iron or steel cargo trailer door latch).

Jammy asserts that the TALH door hinges include design features that are similar to the merchandise described in rulings cited above. Among the shared design characteristics, Jammy notes that the TALH hinges have a “concealed ‘Z’ design, weatherproof materials, weldability, stacked design, and offset mounting intended to go over or around door seal and sit within the specific door frame aperture common to RV entry doors.” Moreover, Jammy maintains that the TALH hinges have specific design elements that distinguish them from hinges for non-motor vehicles, including the Z-shaped hinge, exterior grade materials, outward opening RV doors,

non-removable pins, tolerances, direct mounting (not notched or recessed), variable spacing jamb, and non-corrosive materials.

Furthermore, Jammy claims that the TALH hinges are used in various recreational vehicles that are motor vehicles. The Protestant relies on the following NY and Headquarters (HQ) rulings to support its position that motorhomes and campers are motor vehicles:

- NY N339763, dated May 21, 2024 (classifying cab chassis motor vehicle with permanently mounted habitation unit as motor vehicle);
- NY M87813, dated November 20, 2006 (classifying assembled motorhome as other motor vehicles principally designed for the transport of persons);
- HQ 083628, dated June 6, 1989 (classifying camper van equipped with a gas stove, refrigerator, sink, countertop, swing-out dining table, fold-out side table, food cupboard, clothes closet, and roof-top storage rack, as motor vehicle principally designed for the transport of persons);
- HQ H008507, dated June 4, 2012 (noting in dicta that a recreational vehicle is a kind of motor vehicle);
- HQ H034673, dated September 23, 2010 (classifying an unfinished transit bus as a motor vehicle for the transport of ten or more persons); and
- NY A89958, dated December 16, 1996 (classifying a bus with a diesel engine as a motor vehicle for the transport of ten or more persons).

Based on these classification rulings, Jammy contends that CBP has previously classified various recreational vehicles as motor vehicles. Furthermore, Jammy argues that the TALH hinges are designed for motor vehicles. According to Jammy, the legal standard for determining whether an article is “designed for” a particular use has been established in three court cases: *United States v. Faber*, 7 Ct. Cust. Appls. 406 (1917) (“By the use of the word ‘designed’ it must be assumed that the Congress intended to include only such articles as were peculiarly and specially fitted for . . . such use.”); *Plus Computing Machines, Inc. v. United States*, 44 CCPA 160, C.A.D. 655 (1957) (“In ordinary usage the statement that an article is specially constructed for a particular purpose means merely that it includes particular features which adapt it for that purpose.”); and *Sports Industries, Inc. v. United States*, 65 Cust. Ct. 470 (1970) (“It is well established that whether an article is ‘specially designed’ or ‘specially constructed’ for a particular purpose may be determined by an examination of the article itself, its capabilities, as well as its actual use or uses.”).

We find TALH hinges are designed for use in motor vehicles. The Z-shaped hinges enable the doors to be concealed when opened completely for improved security and improved appearance. The hinge design also allows the doors to accommodate the installation of a weather seal around the perimeter of the door. Furthermore, unlike other hinges that open and close onto one another, the three-leaf and five-leaf design of the TALH hinges do not oppose each other, allowing for a closer door fit. Finally, the design allows the door to move up and down on its frame by a small amount which prevents the flexing of more rigid hinges that could damage the door or doorframe components. Based on the determination that the TALH hinges are designed

for motor vehicles, and consistent with the rulings cited above, we find the subject merchandise is properly classified in heading 8302, HTSUS, specifically in subheading 8302.10.3000, HTSUSA, as hinges designed for motor vehicles.

HOLDING:

In accordance with the above analysis and by application of GRIs 1, the subject aluminum hinges are classified in heading 8302, HTSUS, specifically in subheading 8302.10.3000, HTSUSA, which provides for “Base metal mountings, fittings and similar articles . . . : Hinges, and parts thereof: Of iron or steel, of aluminum or of zinc: Designed for motor vehicles.”

You are instructed to GRANT the Protest. You are further instructed to notify the protestant of this decision no later than 60 days from the date of this decision. Any reliquidation of the entry or entries in accordance with the decision must be accomplished prior to this notification. Sixty days from the date of the decision, the Office of Trade, Regulations and Rulings, will make the decision available to CBP personnel, and to the public on the Customs Rulings Online Search System (“CROSS”) at <https://rulings.cbp.gov/>, which can be found on the CBP website at <http://www.cbp.gov> and other methods of public distribution.

Sincerely,

Yuliya A. Gulis, Director
Commercial and Trade Facilitation Division