



HQ H350927

October 9, 2025

OT:RR:CTF:VS H350927 RMC

CATEGORY: Origin

Minhee Kim
PIE Consulting
2224 Av. Lazaro Cardenas
Monterrey, N.L. Mexico 66266

RE: USMCA Rule of Origin for Automotive Lamps

Dear Ms. Kim:

This is in response to your correspondence of July 21, 2025, in which you ask U.S. Customs and Border Protection (“CBP”) to determine the rule of origin applicable to certain automotive lamps under the United States-Mexico-Canada Agreement (“USMCA”). Your request, submitted as an electronic ruling request, was forwarded to this office from the National Commodity Specialist Division for response.

FACTS:

The merchandise at issue consists of various automotive lamps—such as headlamps, side lamps, and tail lamps—that your client, Hyundai Mobis Mexico S. de R.L. de C.V., will manufacture in Mexico. You state that the goods are classified in subheading 8512.20, Harmonized Tariff Schedule of the United States (“HTSUS”), and are intended for use as original equipment in the manufacture of passenger vehicles and light trucks in the United States. You have asked CBP to determine the USMCA rule of origin that will apply to the goods.

ISSUES:

What is the USMCA rule of origin applicable to the automotive lamps?

LAW AND ANALYSIS:

The USMCA was signed by the Governments of the United States, Mexico, and Canada on November 30, 2018. The USMCA was approved by the U.S. Congress with the enactment on January 29, 2020, of the USMCA Implementation Act, Pub. L. 116-113, 134 Stat. 11, 14 (19 U.S.C. § 4511(a)). General Note (“GN”) 11 of the HTSUS implements the USMCA.

GN 11(a) provides that:

Goods originating in the territory of a country named herein, pursuant to the United States-Mexico-Canada Agreement (USMCA), are subject to duty as provided herein, including any treatment set forth in subchapter XXIII of chapter 98 and subchapter XXII of chapter 99 of the tariff schedule. For the purposes of this note, as provided in the tariff schedule—

- (i) Goods that originate in the territory of Mexico, Canada or the United States (hereinafter referred to as “USMCA country” or “USMCA countries” as further defined in subdivision (l)(xxiv) of this note) under the terms of subdivision (b) of this note and regulations issued by the Secretary of the Treasury (including Uniform Regulations provided for in the USMCA), and goods enumerated in subdivision (p) of this note, when such goods are imported into the customs territory of [sic] the United States and are entered under a subheading for which a rate of duty appears in the “Special” subcolumn, followed by the symbol “S” in parentheses, are eligible for such duty rate, in accordance with section 202 of the United States-Mexico-Canada Agreement Implementation Act; and . . .

GN 11(b) sets forth the criteria for determining whether a good is an originating good for purposes of the USMCA. GN 11(b) states:

For the purposes of this note, a good imported into the customs territory of the United States from the territory of a USMCA country, as defined in subdivision (l) of this note, is eligible for the preferential tariff treatment provided for in the applicable subheading and quantitative limitations set forth in the tariff schedule as a “good originating in the territory of a USMCA country” only if—

- (i) the good is a good wholly obtained or produced entirely in the territory of one or more USMCA countries;
- (ii) the good is a good produced entirely in the territory of one or more USMCA countries, exclusively from originating materials;
- (iii) the good is a good produced entirely in the territory of one or more USMCA countries using nonoriginating materials, if the good satisfies all applicable requirements set forth in this note (including the provisions of subdivision (o)); or

...

Here, based on the information provided, the goods are neither wholly obtained or produced nor produced exclusively from originating materials. We must therefore consider whether the merchandise qualifies as originating pursuant to GN 11(b)(iii).

As noted above, the merchandise is classified in subheading 8512.20, HTSUS. The applicable product-specific rule of origin in GN 11(o)/85.31 is underscored and requires:

31. (A) A change to subheadings 8512.10 through 8512.40 from any other heading; or
- (B) A change to subheadings 8512.10 through 8512.40 from subheading 8512.90, whether or not there is also a change from any other heading, provided there is also a regional value content of not less than:
- (1) 60 percent where the transaction value method is used; or
 - (2) 50 percent where the net cost method is used.

The applicable subheading rule provides that “[t]he underscoring of the designations in subdivision 31 pertain to goods provided for in subheadings 8512.10 through 8512.40 for use in a motor vehicle of chapter 87.” Furthermore, Chapter rule 6 for goods of Chapter 85 provides that “[f]or the purposes of the subdivisions pertaining to this chapter, whenever the subdivision designation is underscored, the provisions of subdivision (k) of this note may apply to goods for use in a motor vehicle of chapter 87.” Here, because the product-specific rule is underscored and the merchandise is for use in a motor vehicle of chapter 87 (namely, a passenger vehicle or light truck), the provisions of subdivision (k) may apply.

GN 11(k) provides special rules for automotive goods. GN 11(k)(i) provides that:

An automotive good and other motor vehicles and parts described herein shall be subject to applicable requirements set forth in this paragraph, including, with respect to a passenger vehicle or light truck that has been authorized to use the alternative staging regime described under subparagraph (viii), applicable requirements for the duration of the alternative staging period specified in the approval.

GN 11(k)(ii)(E)(2) includes in the definition of an “automotive good” any “part, component or material listed in table A.1, A.2, B, C, D, or E of the automotive appendix, subject to any provisions that may be included in regulations issued by the Secretary of the Treasury.” GN 11(k)(ii)(D) defines “automotive appendix” as “. . . the Appendix to Annex 4-B of the USMCA (relating to the product-specific rules of origin for automotive goods, as reflected in subdivision (o) of this note).”

Examining Table C of the automotive appendix, entitled “Complementary Parts for Passenger Vehicles and Light Trucks,” the subject merchandise is listed (“8512.20 – Other lighting or visual signalling [sic] equipment”) and is for use in a passenger vehicle or light truck. The Note to Table C in the automotive appendix provides that “[t]he Regional Value Content requirements set out in Article 4 of this Appendix apply to a good for use in a passenger vehicle or light truck.”

Article 3.5 of the automotive appendix states that:

Notwithstanding the Product-Specific Rules of Origin in Annex 4-B, each Party shall provide that the regional value content requirement for a part listed

in Table C of this Appendix that is for use in a passenger vehicle or light truck is:

...

- (d) 65 percent under the net cost method or 75 percent under the transaction value method, if the corresponding rule includes a transaction value method, beginning on January 1, 2023 or three years after the date of entry into force of this Agreement, whichever is later, and thereafter.

Notwithstanding any regional value content requirement in this paragraph, a part listed in Table C is originating if it meets the applicable change in tariff classification requirement provided in Annex 4-B.

Article 4.2 of the automotive appendix correlates to GN 11(k)(iii)(E), which repeats the regional value content requirements for goods listed in Table C and the option to qualify as originating if the part “meets the applicable change in tariff classification requirement provided in subdivision (o).”

Applying GN 11(k)(iii)(E) here, and under the facts as presented, the following rules of origin may be applied to the goods to determine USMCA originating status:

A change to subheadings 8512.10 through 8512.40 from any other heading; or

A change to subheadings 8512.10 through 8512.40 from subheading 8512.90, whether or not there is also a change from any other heading, provided there is also a regional value content of not less than:

75 percent where the transaction value method is used; or

65 percent where the net cost method is used.

HOLDING:

Based on the information provided, the following USMCA rules of origin may be applied to the automotive lamps:

A change to subheadings 8512.10 through 8512.40 from any other heading; or

A change to subheadings 8512.10 through 8512.40 from subheading 8512.90, whether or not there is also a change from any other heading, provided there is also a regional value content of not less than:

75 percent where the transaction value method is used; or

65 percent where the net cost method is used.

Please note that 19 C.F.R. § 177.9(b)(1) provides that “[e]ach ruling letter is issued on the assumption that all of the information furnished in connection with the ruling request and incorporated in the ruling letter, either directly, by reference, or by implication, is accurate and complete in every material respect. The application of a ruling letter by a Customs Service field office to the transaction to which it is purported to relate is subject to the verification of the facts incorporated in the ruling letter, a comparison of the transaction described therein to the actual transaction, and the satisfaction of any conditions on which the ruling was based.”

A copy of this ruling letter should be attached to the entry documents filed at the time this merchandise is entered. If the documents have been filed without a copy, this ruling should be brought to the attention of the CBP officer handling the transaction.

Sincerely,

Monika R. Brenner, Chief
Valuation and Special Programs Branch