



**U.S. Customs and  
Border Protection**

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March 13, 2026

CLA-2-84:OT:RR:NC:N1 104

CATEGORY: Classification

TARIFF NO.: 8479.89.9599; 8479.90.9596; 9817.00.96

Tyler Keith  
Flexport Customs, LLC  
100 California Street, Floor 5  
San Francisco, CA 94111

RE: The tariff classification of a mechanical tensioning device and mounting interface from China

Dear Mr. Keith:

In your letter dated February 18, 2026, on behalf of your client, Click Medical, LLC, you requested a tariff classification ruling.

The items in question are the Click Reel, part number SR7-001.3-100CM, and the Lamination Collar with Dummy, part number SA-200.3.

The Click Reel is a disc-shaped mechanical tensioner that enables a user to tighten, loosen, or fine-tune their prosthetic or orthotic sockets by manually turning a dial on the device. This mechanical device consists of an internal stainless-steel spool and gearing, which allows users with limited hand strength, dexterity challenges, unilateral limb use, and range of motion restrictions to apply sufficient tension without strain. The Click Reel is used with the company's Click Reel tensioning and adjusting kits which include fasteners, mountings, cords/laces, and lamination collars, that are required to install and operate the reel. The Click Reel must be integrated into the prosthetic or orthotic device together with the Lamination Collar (described below) to perform its function. When the Click Reel's dial is rotated, the cords or laces that are threaded through the Click Reel are tensioned or loosened.

The Lamination Collar with Dummy is a cup-shaped silicone polydimethylsiloxane housing with port holes that serves as the mounting interface for the Click Reel and allows for lace routing configuration. The Collar is permanently embedded into the prosthetic or orthotic socket's inner lamination layers during the installation process. The Click Reel is mounted into the Collar. The Collar includes a removable silicon Dummy to support its integration during the vacuum lamination process. The Dummy is a fabrication-specific insert that is engineered to maintain the collar's geometry during lamination, allowing it to be cleanly removed without bonding or melting.

You suggest classifying the Click Reel and Lamination Collar with Dummy under subheading 9021.10.0090, Harmonized Tariff Schedule of the United States (HTSUS), which provides, in relevant part, for orthopedic appliances and parts and accessories thereof. We disagree. The Click Reel is a mechanical tensioning device used in prosthetic or orthotic applications to adjust the fit of prosthetic sockets or orthoses. It is not an orthopedic appliance itself, as defined in Note (6) to Chapter 90, nor is it a part or accessory of an adjustable prosthetic or orthotic device. Although the Click Reel is integrated into a prosthetic or orthotic device as a component, it operates as its own functioning system. It is functionally self-sufficient and is not considered a part or accessory, but rather a distinct and separate commercial entity. The Click Reel will not be classified under subheading 9021.10.0090, HTSUS. The Lamination Collar with Dummy is a specially designed part that works solely with the Click Reel. Subheading 9021.10.0090, HTSUS, does not apply to this item either.

The applicable subheading for the Click Reel will be 8479.89.9599, HTSUS, which provides for Machines and mechanical appliances having individual functions, not specified or included elsewhere in this chapter, parts thereof: Other machines and mechanical appliances: Other: Other: Other. The general rate of duty will be 2.5% ad valorem.

The applicable subheading for the Lamination Collar with Dummy will be 8479.90.9596, HTSUS, which provides for Machines and mechanical appliances having individual functions, not specified or included elsewhere in this chapter, parts thereof: Parts: Other: Other: Other. The general rate of duty will be Free.

In your submission you requested consideration of a classification under 9817.00.96, HTSUS, which applies to articles and parts and accessories of articles specifically designed or adapted for the use or benefit of the permanently or chronically physically or mentally handicapped.

Subheading 9817.00.96, HTSUS, covers: “Articles specially designed or adapted for the use or benefit of the blind or other physically or mentally handicapped persons; parts and accessories (except parts and accessories of braces and artificial limb prosthetics) that are specially designed or adapted for use in the foregoing articles . . . Other.” The term “blind or other physically or mentally handicapped persons” includes “any person suffering from a permanent or chronic physical or mental impairment which substantially limits one or more major life activities, such as caring for one’s self, performing manual tasks, walking, seeing, hearing, speaking, breathing, learning, or working.” U.S. Note 4(a), Subchapter XVII, Chapter 98, HTSUS. Subheading 9817.00.96, HTSUS, excludes “(i) articles for acute or transient disability; (ii) spectacles, dentures, and cosmetic articles for individuals not substantially disabled; (iii) therapeutic and diagnostic articles; or, (iv) medicine or drugs.” U.S. Note 4(b), Subchapter XVII, Chapter 98, HTSUS.

In *Sigvaris, Inc. v. United States*, 227 F. Supp 3d 1327, 1336 (Ct. Int’l Trade 2017), aff’d, 899 F.3d 1308 (Fed. Cir. 2018), the U.S. Court of International Trade explained that “specially” means “to an extent greater than in other cases or towards others” and “designed” means something that is “done, performed, or made with purpose and intent often despite an appearance of being accidental, spontaneous, or natural.” We must first evaluate “for whose, if anyone’s, use and benefit is the article specially designed,” and then, whether “those persons [are] physically handicapped [].” *Sigvaris*, 899 F.3d at 1314. The Court of Appeals for the Federal Circuit clarified in *Sigvaris*, 899 F.3d at 1314-15, that to be “specially designed,” the merchandise “must be intended for the use or benefit of a specific class of persons to an extent greater than for the use or benefit of others” and adopted the five factors used by U.S. Customs and Border Protection (CBP):

- (1) the physical properties of the article itself (i.e., whether the article is easily distinguishable by properties of the design, form, and the corresponding use specific to this unique design, from articles useful to non-handicapped persons);
- (2) whether any characteristics are present that create a substantial probability of use by the chronically handicapped so that the article is easily distinguishable from articles useful to the general public and any use thereof by the general public is so improbable that it would be fugitive;
- (3) whether articles are imported by manufacturers or distributors recognized or proven to be involved in this class or kind of articles for the handicapped;

(4) whether the articles are sold in specialty stores which serve handicapped individuals; and (5) whether the condition of the articles at the time of importation indicates that these articles are for the handicapped.

The Click Reel and Lamination Collar with Dummy are specially designed for the benefit of persons with permanent or long-term physical impairments (i.e., loss of a limb, etc.), allowing them to easily adjust the tension of their prosthetic or orthotic sockets. The devices work with various Click Medical systems that are integrated into prosthetic or orthotic devices, and have no other uses. The articles are not marketed to the general public nor are they likely to be used by the general public. The articles are imported by a manufacturer involved in developing products for individuals with permanent physical impairments. The products are prescribed, fitted, and maintained by professionals such as prosthetists, orthotists, and prosthetist-orthotists, and sold through licensed clinics, hospitals, and institutions. Finally, as imported the articles are in a condition for use only in the Click Medical's prosthetic and orthotic tensioning and adjusting systems. Therefore, the Click Reel and Lamination Collar with Dummy are eligible for duty-free treatment under subheading 9817.00.96, HTSUS.

The duties cited above are current as of this ruling's issuance. Duty rates are provided for your convenience and are subject to change. The text of the most recent HTSUS and the accompanying duty rates are provided at <https://hts.usitc.gov/>.

This ruling does not address the applicability of any additional duties, taxes, fees, exactions and/or other charges, which may apply to the goods discussed herein. This includes, but is not limited to, tariffs and other duties as provided for in Subchapter III to Chapter 99, HTSUS. Thus, for example, in addition to the classification stated above, the merchandise covered by this ruling may also need to be reported with either the Chapter 99 provision under which an additional tariff applies or one of the Chapter 99 provisions covering exceptions to such tariffs.

For further information to assist with the importation process, please refer to the frequently updated Cargo Systems Messaging Service (CSMS) messages at <https://www.cbp.gov/trade/automated/cargo-systems-messaging-service> and the Trade Remedies page at <https://www.cbp.gov/trade/programs-administration/trade-remedies>.

The holding set forth above applies only to the specific factual situation and merchandise description as identified in the ruling request. This position is clearly set forth in Title 19, Code of Federal Regulations (CFR), Section 177.9(b)(1). This section states that a ruling letter is issued on the assumption that all of the information furnished in the ruling letter, whether directly, by reference, or by implication, is accurate and complete in every material respect. In the event that the facts are modified in any way, or if the goods do not conform to these facts at time of importation, you should bring this to the attention of U.S. Customs and Border Protection (CBP) and submit a request for a new ruling in accordance with 19 CFR 177.2.

Additionally, we note that the material facts described in the foregoing ruling may be subject to periodic verification by CBP.

This ruling is being issued under the provisions of Part 177 of the Customs and Border Protection Regulations (19 C.F.R. 177).

A copy of the ruling or the control number indicated above should be provided with the entry documents filed at the time this merchandise is imported. If you have any questions regarding the ruling, please contact National Import Specialist Arthur Purcell at [arthur.purcell@cbp.dhs.gov](mailto:arthur.purcell@cbp.dhs.gov).

Sincerely,

(for)

James Forkan  
Designated Official Performing the Duties of the Division Director  
National Commodity Specialist Division