



May 6, 2025

The Honorable Howard Lutnick
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

Re: Comments on Section 232 National Security Investigation of Imports of Pharmaceuticals and Pharmaceutical Ingredients [Docket No. 250414-0065; XRIN 0694-XC120]

Dear Secretary Lutnick:

Bound Tree Medical (BTM) is one of the nation's largest distributors of emergency medical services (EMS) supplies, serving more than 30,000 customers. Headquartered in Dublin, Ohio, we operate distribution centers in Visalia, California; Jacksonville, Florida; Greenwood, Indiana; Elizabethtown, Pennsylvania; and Grand Prairie, Texas. With over 45 years of experience, we understand the serious challenges faced by EMS agencies across the country and the important role each plays in providing life-saving care to patients daily. We write to provide comments on the Section 232 investigation of pharmaceuticals and provide our perspective on the potential impact of the Administration's tariff actions on the medical supply chain, in particular on EMS-administered pharmaceuticals.

EMS professionals are on the front lines of America's health care system—responding to 9-1-1 calls, providing life-saving interventions, and transporting patients in crisis by ground or air. These teams handle more than 30 million patient transports each year, covering a wide range of urgent medical needs including cardiac arrest, trauma, and respiratory distress. However, despite their essential role, EMS agencies face unprecedented operational and financial pressures.

Chronic under-reimbursement from Medicare, Medicaid, and commercial payers—often covering just 20-50% of the actual cost—has left many agencies struggling to keep their doors open. Staff shortages, burnout, and increasing supply costs only compound the crisis. The Centers for Medicare and Medicaid Services (CMS) recently underscored the fragile financial state of EMS in its 2024 report on the Ground Ambulance Data Collection System (GADCS). The GADCS survey shows that revenues failed to cover costs across all ambulance service types and settings, with an average shortfall of 57% per transport.

Compounding the challenge is EMS agencies' need for airway and oxygen products, first aid, trauma and wound care, pharmaceuticals, defibrillation, suction, immobilization and splinting, infection control, and other medical supplies. BTM's portfolio includes more than 15,000 medical products sourced from hundreds of trusted manufacturers. Since the pandemic, the medical supply chain has been steadily diversifying, investing in new manufacturing, and reducing its dependence on foreign-made goods. However, despite these efforts, the majority of medical supplies used by EMS are still sourced from multiple countries. Tariffs on these essential items threaten to increase prices, deepen supply chain complexity, and trigger shortages of critical drugs—many of which are lifesaving and time-sensitive.

Notably, the National Association of EMS Physicians has identified 66 essential medicines that should be available on every ambulance. Among them are nine "minutes count medications"—drugs that must be administered within minutes to avoid death or severe disability in patients suffering from stroke, cardiac arrest, seizures, and other acute conditions. Many of these are low-cost, generic sterile injectables that are already susceptible to economic and supply chain disruptions.



Bound Tree

Your Partner In EMS

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Thank you for your consideration and your commitment to supporting emergency medical services.

Sincerely,

Rob Meriweather
President
Bound Tree Medical

Encl.: List of Essential EMS Medical Supplies



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Essential EMS Medical Supplies

Pharmaceuticals	HTS Code or Category
Epinephrine (aka "Adrenaline")	2937.90.05.00
Lidocaine	2924.29.57.00
0.9% saline (aka "normal saline")	3004.90.92
Lactated Ringers Solution (aka "Ringers Lactate")	3004.90.92
Albuterol	2922.50.13.00
Midazolam	2933.91.00.00
10% dextrose solution (aka IV glucose)	3004.90.92

Airway and Oxygen Products	HTS Code or Category
Bag Valve Masks	9019.20.00.00
CPAP Units & Accessories	9019.20.00.00
CPR Masks & Shields	3926.90.99.50
Circuits & Accessories	8542.31.00
Decompression and cricothyrotomy kits	9018.90
ET Tube Holders	9018.90
HMEs & Filters	9018.90
Humidifiers	8479.89.10.00
Intubation Aids	9027.10.60.00; 9018.90
Intubation Kits	9018.90
Laryngoscope Blades	9018.90.30.00
Laryngoscope Handles	9018.90.30.00
Laryngoscope Parts	9018.90.30.00
NPAs	9018.90
Nasal Cannulas	9019.20.00.00
Nebulizers	9019.20.00.00
Oral Airways	9018.90
Oxygen masks	9020.00
Oxygen tubing	9019.20.00.00
Peak Flowmeters	9018.90
Pneumothorax equipment	9018.90
Specialty tubing	9019.20.00.00
Stylets	9018.39.00
VL Blades & Parts	9018.90.30.00
Video Laryngoscopes	9018.90.44



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First Aid, Trauma & Wound Care	HTS Code or Category
Bandages	3005.10
Bleeding control	9018.90
Burn care	3005.90
Chest Seals	9018.39.00
First aid kits	3006.50.00
Forceps	9018.90
Hemostatics	3005.90
Holsters & Glove Pouches	4202.99.90.00
Inhalants	3004.49.00
Lubricating Jelly	3006.70
Ointments & Creams	3004
Self-Adherent Wraps	3919
Shears & Scalpels	8213.00
Swabs, Pads & Sprays	5601.21.00
Sponges & Gauze	3005.10
Staplers & Sutures	9018.90
Tapes	3005.90
Tourniquets	9018.90
Trauma Dressings	3005.90

Defibrillation	HTS Code or Category
Defibrillation equipment	9018.90.64.00

Suction	HTS Code or Category
Canisters	9018.90
Catheters & Tips	9018.39.00

Immobilization & Splinting	HTS Code or Category
Arm Slings	9021
Backboards	9402
Cervical Collars	9021
Splints	9021



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Infection Control	HTS Code or Category
Biohazard Bags	3293.29.00.00
Disinfecting Solutions	3808.94
Eye Protection	9004.90.00.10
Face Masks	4818.90.00
Glove dispensers	9402
Gloves	4015.12.10.10
Gowns & Covers	4818.50.0020
Hand Cleaners	3401.19.0000
N95 Respirators	6307.90.98.42