March 26, 2020

The Honorable Christopher C. Krebs  
Cybersecurity and Infrastructure Security Agency  
Department of Homeland Security  
245 Murray Lane  
Washington, D.C. 20528-0380

Dear Director Krebs,

First and foremost, the undersigned industry groups thank you for the March 19, 2020 memorandum on identification of essential critical infrastructure workers during the COVID-19 response. We represent the manufacturers of products and raw materials used in the manufacture and maintenance of motor vehicles. Our members have employees and facilities in all 50 states.

As many states are issuing shelter in place orders and other business restrictions, this memo has become a helpful tool to evaluate what businesses are essential. The industry also appreciates your most recent update to the Critical Manufacturing section to clarify that it encompasses "supply chains" and the "workers needed to maintain the continuity of these manufacturing functions and associated supply chains."

Motor vehicles suppliers are an integral part of the vehicle manufacturing and repair industry, which was deemed a part of the critical manufacturing sector. Properly operating vehicles are vital to the critical needs of the American people in times of crisis. Critical infrastructure and life-sustaining services rely on vehicles such as ambulances, police vehicles, and fire trucks as well as vehicles belonging to health care workers and shipping and local delivery businesses. The operators of these vehicles must have access to new vehicles as well as vehicle repair and maintenance components that allow them to serve the nation. **The bottom line is straightforward: We are deemed "critical" manufacturers...and we want to go to work.**

States are relying on CISA’s document on essential workforce; therefore, it is critical to ensure that states have a common understanding that motor vehicle parts manufacturers and other companies within the motor vehicle supply chain are essential to the manufacturing sector. Direct clarification from CISA can quickly and effectively clear this confusion and create consistent messaging across all 50 states during this crisis. This document has been subject to multiple interpretations and the lack of clarification going forward will put suppliers in a difficult position while they are already working diligently to ensure the safety of their workforce and the future of their operations. We are asking you to confirm that employees who manufacture motor vehicle parts for vehicle manufacturing and repair are critical manufacturing employees.

Once again, thank you for the work you’ve already done for the critical infrastructure sector and we hope you can issue guidance soon clarifying the essential work motor vehicle parts manufacturers do. Please contact Melanie Weiland at mweiland@mema.org or at 724-882-4840 if you have any questions.

Sincerely,

The Motor & Equipment Manufacturers Association  
Alliance for American Manufacturing  
American Iron and Steel Institute  
The Aluminum Association  
Auto Care Association
Battery Council International
Industrial Fasteners Institute
MIChauto
North American Die Casting Association
National Tooling & Machining Association
Precision Metaforming Association
Precision Machined Products Association
U.S. Tire Manufacturers Association