

October 17, 2025

Re: [Docket No. 250924-0160], Request for Public Comments on Section 232 National Security Investigation of Imports of Personal Protective Equipment, Medical Consumables, and Medical Equipment, Including Devices

The Radiological Society of North America (RSNA) is a non-profit professional association representing over 52,000 medical imaging professionals spanning the full breadth of radiologic subspecialties in more than 150 countries. Our mission is to promote excellence in patient care and healthcare delivery through education, research, and technological innovation. RSNA appreciates the opportunity to provide input to the Department of Commerce Bureau of Industry and Security Docket No. 250924-0160.

Radiology is uniquely positioned at the intersection of technology and medicine because the specialty relies on cutting-edge instruments to visualize, diagnose, and treat a wide range of medical conditions. For example, technologies such as computed tomography (CT) scanners and magnetic resonance imaging (MRI) machines use sophisticated computer algorithms and advanced engineering to produce detailed images of the body's internal structures, enabling physicians to detect diseases early and plan effective treatments. Additionally, the integration of artificial intelligence (AI) into radiology has revolutionized the field by assisting radiologists in identifying subtle abnormalities, improving diagnostic accuracy, and streamlining workflow.

The medical technology industry is vital to the practice of radiology and the nation's healthcare ecosystem. Technical innovations in medical imaging technology enhance diagnostic precision and enable personalized care thereby improving patient outcomes. An active global market for medical technology is essential for driving ongoing innovation, keeping costs manageable, and enhancing the quality of care for patients.

As the Department of Commerce undertakes its Section 232 investigation, RSNA encourages careful consideration of the resilience and stability of the healthcare ecosystem, where many imaging and radiologic devices and their components are produced globally. Disruptions in the supply chain may lead to higher costs and delays in patient care, which could ultimately have a negative effect on health outcomes. It is essential that any regulatory measures protect patient access to advanced medical technologies and avoid unintended limitations.

For additional information or questions, please contact RSNA's Director of Government Relations, Libby O'Hare (eo hare@rsna.org).

Sincerely,



Jeffrey S. Klein, MD
Chair of the Board
Radiological Society of North America

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