

Exhibit 10

Declaration of Ken Gear, Leading Builders
of America

**BEFORE THE
UNITED STATES INTERNATIONAL TRADE COMMISSION**

**QUARTZ SURFACE PRODUCTS
INV. NO. TA-201-79 (REMEDY)**

**DECLARATION OF KEN GEAR
CHIEF EXECUTIVE OFFICER OF LEADING BUILDERS OF AMERICA**

1. My name is Ken Gear. I am the Chief Executive Officer at Leading Builders of America. LBA represents 22 of the largest production homebuilders in the United States, who build more than half of all new single-family homes in this country, most of which are entry-level homes and homes for working families.

2. LBA members employ hundreds of thousands of employees directly and indirectly and generate over 2 million more jobs through our construction trade partners. As I explained in my testimony, we are currently in an affordability crisis that has hit the homebuilding sector particularly hard and has not improved. Home prices are up nearly 80% over roughly the last decade, while household income has increased by less than half that amount over the same period. Tariffs on key building material products like quartz surface products (“QSP”) make this crisis worse.

3. During the remedy hearing, Commissioner Kearns questioned whether a tariff on QSP would have anything more than a fractional impact on the cost of building a home. This conclusion is not supported by Petitioner’s arguments nor by the reality of the market. Petitioner overestimates the typical cost of the homes that my members are building. Our member companies, who represent approximately one-half of all new single-family homes built and sold each year, reported an average selling price well below the numbers suggested by Petitioner. For example, the two largest home

builders in the country, D.R. Horton, which sold 83,622 homes in 2025, and Lenar, which sold 82,580 homes in 2025, reported an average selling price of \$368,300 and \$386,000, respectively.¹ Of course these are averages, so many homes are sold at price points well below these levels. These statistics taken together demonstrate that the typical starting point for a very large share of new homes produced by leading builders is in the upper-\$300,000s, which is much lower than the numbers submitted by Petitioner.

4. In addition to Petitioner overestimating the typical cost of the homes that my builders build, Petitioner also underestimates the amount and importance of quartz used in those homes. Builders look for opportunities to control home prices on every input, regardless of size, while building quality and affordable homes. What may seem like a small increase to Petitioner is significant to builders and their customers. Petitioner also underestimates the amount of QSP used in a typical home, which usually includes countertops, vanities, and other part of the home. LBA's members specified about 90 percent QSP out of all surface products in 2025, with granite making up most of the remainder. My estimate based on discussions with my members is thus that a 50% tariff will likely lead to an average of about \$1,000 in increased costs per home built. A \$1,000 increase in home costs will price over 150,000 additional U.S. households out of the market.² In short, tariff on imports of QSP will have a significant financial impact on the cost of new home builds today, which will in turn hurt thousands upon thousands of Americans hoping to be able to afford a new home.

¹ <https://newsroom.lennar.com/2025-12-16-Lennar-Reports-Fourth-Quarter-and-Fiscal-2025-Results>;
<https://investor.drhorton.com/~media/Files/D/D-R-Horton-IR/reports-and-presentations/presentations/dhi-q1-2026-investor-presentation.pdf>.

² <https://www.nahb.org/news-and-economics/housing-economics/housings-economic-impact/households-priced-out-by-higher-house-prices-and-interest-rates>.

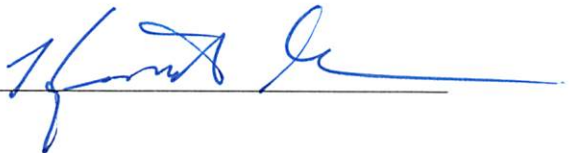
5. In the hearing, Petitioner asserted that significant price-based competition between domestic QSP and imported QSP exists at all ends of the market. However, that is simply not the case for large homebuilders. The customers that LBA's members serve cannot afford the high-end QSP products produced by Petitioner, and currently buy an exceedingly small volume of these products per year. To the contrary, if imported QSP becomes more expensive or difficult to source, then our specifications will not shift to domestically made QSP. Rather, all of LBA's members that I have spoken with have confirmed to me that the result of a new high tariff on QSP will be to (1) pass along the higher cost of the tariff on QSP products, and (2) shift back to serving customers with larger volumes of granite, other natural stones, solid surface, laminate, or similar alternative surfaces at the lowest pricing tiers. As such, any shortage or cost increases for QSP would directly harm homebuilders' ability to build residences for American families.

6. The uncertainty caused by a restrictive quota would be even worse than a high tariff. Homebuilders typically specify materials in new construction projects 1-to-2 years before the home is delivered. Each QSP design is unique, and home buyers that specify a particular design do not want to switch to a different style if it becomes unavailable. A restrictive quota would therefore be entirely unworkable for LBA's members—they simply will not specify a building material if there is any reasonable possibility that it will not be available at the time that it needs to be installed. If a restrictive quota were to be imposed, LBA members would need to significantly reduce the QSP products that are available at all to be specified in new homes and shift to other types of surface products where builders can ensure availability.

7. For the foregoing reasons, the trade restrictions sought by Petitioner will bring financial harm to homebuilders and their workers. I respectfully urge the Commission not to recommend a remedy that restricts trade.

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I hereby attest that the foregoing is true and accurate

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Ken Gear
Chief Executive Officer
Leading Builders of America

April 20, 2026