

June 20, 2017

Brad Botwin, Director, Industrial Studies
Office of Technology Evaluation
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 1093
Washington, DC 20230

RE: Section 232 National Security Investigation of Imports of Aluminum

Dear Mr. Botwin:

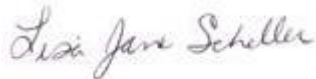
Silberline Manufacturing Co., Inc., headquartered in Tamaqua, Pennsylvania, with manufacturing in Pennsylvania and Indiana, is a private, family-owned business founded in 1945. Silberline is a global leader in the manufacture of metallic aluminum pigments sold globally, with approximately 40% of our revenue derived from export business to all regions of the world. We are proud of our 257 US-based employees supporting our position in the industry.

A key raw material for the manufacture of aluminum pigments is aluminum powder. Our ability to purchase the required quality and quantity of product from US-sourced material is limited and insufficient to support our increasing demand. As a result, we must import product from alternative global sources, including China and elsewhere. In our experience, the price of high quality aluminum powder sold in the US via China-based manufacturers is market-based and competitive to options available globally. We understand that Chinese aluminum powder generally is produced in low volumes and production is not government-subsidized.

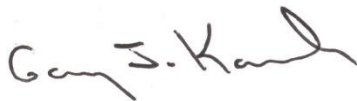
Due to the unique product specifications of aluminum pigments, it is critical to the ongoing viability of our business to have access to the global marketplace, including China, without unfair remedies that would hamper us from competing globally.

We respectfully submit the request to carve out any trade remedies with respect to this very narrow product segment; specifically, engineered products included in Chapter 7603 of the Harmonized Tariff Schedule. Inclusion of such remedies likely would have a detrimental impact on Silberline, our ability to continue as a US based-leader in our industry, and continued employment of our 257 US-based employees.

Respectfully,



Lisa Jane Scheller
Chairman



Gary J. Karnish
CEO