



June 23, 2017

Mr. 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: Request for Comment: "Section 232 National Security Investigation of Imports of Aluminum"

Starline Windows USA LLC welcomes the opportunity to provide comments with respect to the United States Department of Commerce's "Section 232 Investigation on The Effect of Imports of Aluminum on U.S. National Security". We sell and install unitized wall modules for use in residential hi-rise projects in the Western United States. Our primary product, aluminum framed Unitized Window Wall, is manufactured in Canada and incorporates mainly USA produced aluminum billet.

Canada and the US share an integrated aluminum market and it is in our business's interest, and the US's interest more broadly, to maintain an open aluminum market between the US and Canada. There is significant cross border trade in aluminum between Canada and the US and the interruption of this trade, whether primary aluminum, semi-finished aluminum, or manufactured goods containing aluminum, would have consequences on US companies' supply of inputs and export sales. Further, Canadian aluminum is sold, marketed and supplied to the US in a responsible and fair manner, and does not harm US aluminum producers or US national security.

In the case of our business, aluminum extrusion content (and therefore USA produced aluminum billet) represents a significant portion of the cost of our unitized wall module products, therefore any 232 Measure against our products would negatively affect our ability to continue selling our products (including the USA billet) into the USA market.

For these reasons, we submit that a 232 Measure against aluminum should not apply to Canadian aluminum or aluminum products.

Yours truly,

Starline Windows USA LLC

A handwritten signature in blue ink, appearing to read "Paul Arnold", is written over the printed name.

Paul Arnold
GM, Preconstruction Services