



TORO ALUMINUM

USA Corp.

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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"

Toro Aluminum USA Corp. 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".

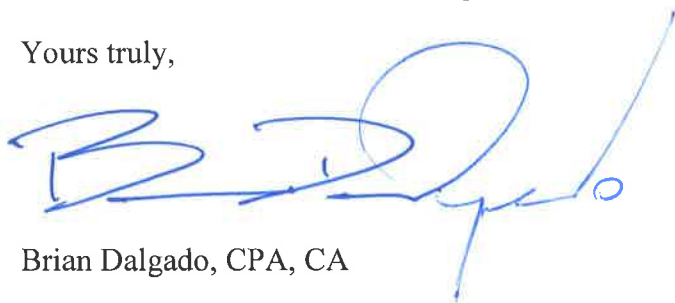
Toro Aluminum USA Corp. is a member of the glazing industry and is a provider of window wall and curtain wall systems in the United States. We have offices in Oregon and more recently in Los Angeles. We obtain our manufactured products from Canada. Our primary manufacturers are Toro Aluminum and Toro Glasswall Inc. We are ultimately owned by a Canadian parent company. We hire US based window wall and curtain wall installation companies to coordinate the installation of the manufactured windows we import from Canada.

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, we would be negatively affected by the higher costs of our imports from Canada. These higher costs would negatively impact our US business and our US employment levels.

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

Yours truly,

A handwritten signature in blue ink, appearing to read "B. Dalgado", with a large, stylized flourish extending upwards and to the right.

Brian Dalgado, CPA, CA

Chief Financial Officer

Cc: Franco Di Marco, President, Gerry Laforet, Vice President