



TIMCO - STANDARD - TANDEM - ALPASE

Corporate Headquarters

13428 Benson Avenue - Chino CA 91710

April 17, 2017

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

Via email

Re: Section 232

Dear Mr. Botwin:

I am sending you this information to protest an adverse ruling from the Section 232 investigation.

My family business is currently in operation under the management of the fourth generation. My grandfather started this business in 1946. Today our company operates three locations in California, one in Texas, and one in Aguascalientes Mx.

In the United States we employ 300 employees. We are a downstream business; meaning we use imported aluminum products (primary aluminum and slabs) to produce other products used by automotive, aerospace, semi conductor and commercial industries. More information on our divisions and products can be found on our website www.tst-inc.com.

Similar to other US manufacturers, we would like the products that we produce to be protected from low cost imports but a blanket duty on all aluminum imports will do more harm. Our concern with this investigation is that putting a duty on primary aluminum may greatly harm us from being able to competitively export our products to Mexico and worldwide.


Uninformed individuals might think that a duty drawback would alleviate our concerns. However, duty drawback under NAFTA does not allow us this benefit for exporting to Mexico.

Under NAFTA:

Temporary importation under bond. Except in the case of a good imported from Canada or Mexico for repair or alteration, where a good, regardless of its origin, was imported temporarily free of duty for repair, alteration or processing (subheading 9813.00.05, Harmonized Tariff Schedule of the United States) and is subsequently exported to Canada or Mexico, duty shall be assessed on the good on the basis of its condition at the time of its importation into the United States. Such duty shall be paid no later than 60 calendar days after either the date of exportation or the date of entry into a duty-deferral program of Canada or Mexico, except that, upon filing of a proper claim under paragraph (a)(3) of this section, the duty shall be waived or reduced in an amount that does not exceed the lesser of the total amount of duty payable on the good under this section or the total amount of customs duties paid to Canada or Mexico.

Please let us know if we can provide any other information.

Sincerely,

A handwritten signature in black ink that reads "Andrew G. Stein". The signature is written in a cursive, flowing style.

Andrew G. Stein
President/CEO