



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

From Christophe Marnat  
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ZF North America, Inc.  
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**VIA ELECTRONIC MAIL ONLY TO: [Aluminum232@bis.doc.gov](mailto:Aluminum232@bis.doc.gov)**

Re: Comments on Section 232 Investigation of Aluminum Imports

Dear Director Botwin:

ZF North America, Inc. is a primary developer and producer of chassis, powertrain, and active and passive safety systems and serves all major vehicle manufacturers worldwide. We have employees in Alabama, Michigan, Indiana, Minnesota, Arizona, Georgia, Illinois, Tennessee, Ohio, South Carolina, Wisconsin and New York. We also supply the defense industry with various products that help to improve safety.

Any adjustments to aluminum imports would have economic effects on our company such as loss of business, nationally and internationally; loss of jobs due to decreased competitiveness in the international market; and likely relocation of complete business lines into other countries such as Mexico, Canada, Europe, and China.

Our company is a member of the Motor & Equipment Manufacturers Association and we endorse the comments being filed by MEMA in response to the Department of Commerce, Bureau of Industry and Security's request for public comments on Section 232 National Security Investigation of Imports of Aluminum. We are providing these additional public comments regarding the specific impact on our company of any adjustments to aluminum imports.

To ensure the safety integrity of our products, we must use aluminum meeting unique specifications. If we cannot obtain that aluminum, there will be serious economic consequences to our business overall, and particularly to our business in the U.S. as we might have to relocate production to one of our many facilities outside the U.S. where the proper aluminum is available. This would adversely impact employment in the United States. As a practical matter, forcing our company to find new domestic sources of aluminum in the U.S., if such sources are even available, would require extensive testing of suppliers/materials/tools to ensure that our standards are met which would decrease production. Because we manufacture some of the same products at multiple



locations globally, the goal is for consistency among the products which usually means the same aluminum source is used. The U.S. facility will be disadvantaged compared to our sister facilities abroad if we are forced to use different aluminum. Our products are typically designed for global use and the materials used are suitable to that global audience. Requiring the company to use different aluminum in products for the U.S. market simply due to the limitations on aluminum available in the U.S. would put our U.S. facilities at a severe disadvantage.

For example, we have aluminum products that we cannot source in the U.S. due to tolerances. The foreign manufacturer is a niche supplier known for tight tolerances for the product we need. The U.S. is not known for these specialty production processes. We have contacted multiple U.S. suppliers to inquire if they can produce the product, but the responses have been that they would need a wider tolerance to be able to manufacture the products. We cannot accept the wider tolerance for our needs.

Also, we have also worked with aluminum companies on specialty aluminum suitable to our unique needs (for example, Isotropical® developed by Strojmetal Aluminium Forging). To re-do that process with a U.S. aluminum company would take months if not years (assuming interest, capacity and capability by the U.S. aluminum company).

If adjustments are placed on the importation of aluminum, Mexico and Canada must be excluded in their entirety. Mexico and Canada are considered part of ZF's industrial base in North America. Indeed, the name of our company is ZF North America, Inc. which signifies the importance of all three countries to our U.S. production. ZF relies heavily on imports of aluminum from Mexico and Canada in order to manufacture downstream products in the United States. Restricting our access to aluminum from those countries, or increasing the cost of aluminum from those countries, is not in the national interest. Our ability to profitably run its U.S. production lines would be jeopardized which could have the effect of adversely impacting our ability to develop new products that improve safety for the U.S. defense industry.

Regardless of whether Mexico and Canada are excluded from import adjustments, certain products must be excluded from import adjustments because those products are not available in the United States, cannot be timely supplied to us in the United States, or are not available in sufficient quantities for our needs. Requiring us to pay more for aluminum that is not available to us from U.S. producers would cut into our ability to re-invest in our U.S. workforce and facilities.

Here we are providing a non-exhaustive list of products that would need to be excluded from any adjustments on imports and we urge the Department to institute a separate process for requesting product exclusions. We can provide additional information and a list of additional products to be excluded when requested.

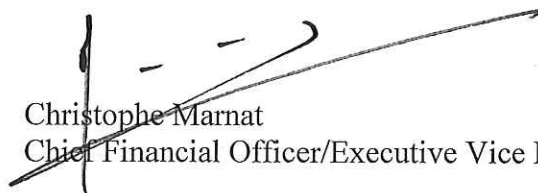
- Aluminum waste and scrap (HTS 7602)
- Aluminum bars, rods and profiles (HTS 7604)



- Aluminum foil (whether or not printed, or backed with paper, paperboard, plastics or similar backing materials) of a thickness (excluding any backing) not exceeding 0.2 mm (HTS 7607)
- Aluminum tube or pipe fittings (for example, couplings, elbows, sleeves) (HTS 7609)
- Other articles of aluminum (HTS 7616)
- Forgings Aluminum (HTS 8708)
- Aluminum Transmission housings 8HP / 9HP (HTS 8708)
- Aluminum Intermedium plates for transmissions 9HP (HTS 8483)
- Aluminum Shims 8HP (HTS 8708)
- Aluminum piston C+D 9HP (HTS 8412)
- Aluminum piston A+B 8HP (HTS 8412)
- Disc Carrier 9HP (HTS 8708)
- Converter Bell 9HP (HTS 8708)
- Aluminum components for steering applications (HTS 8708)

Please contact me at (734) 855-3217 if you need any additional information.

Sincerely,



Christophe Marnat  
Chief Financial Officer/Executive Vice President