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Brad Botwin – Director, Industrial Services, US Department of Commerce  
1401 Constitution Ave, NW., Washington DC, 20230

June 13<sup>th</sup>, 2017

Dear Mr Botwin,

I have worked for an aluminum extrusion company in the western US for many years. My company employs more than 700 hard-working people in various extrusion, fabrication, finishing and support operations.

I was most disturbed to see the 232 investigation into aluminum smelting in the US. I have experienced the gradual decline of smelting in our country over the past 15 years. But, it appears to be a warranted decline. The owners (Alcoa, Alcan, Rio Tinto, Century, Noranda etc) have made little effort to reinvest in their businesses at the same time that they have invested in smelting operations off-shore.

This off-shore investment was in response to climbing power costs in the US in the face of cheaper power in places like the Middle East and Iceland. In some cases domestic smelters have declared force majeure and failed to fulfill contracts with us, while selling their power into the US grid for a profit.

There doesn't appear to be a solid plan for anyone to build a new smelter in the US in the face of less competitive power costs, higher labor costs, higher environmental costs etc etc.

Any restart of previously curtailed US smelters will not add to the US workforce significantly. When I have toured smelters they are undoubtedly huge facilities – but run by a handful of people. By comparison extrusion operations use relatively small buildings but require workforces in the hundreds.

A duty or tariff on imported primary aluminum will have to be added to the cost of our extrusions and passed along to our customers, covering a broad swath of US manufacturing industries. That increase will then get passed along to their consumers. As a result, middle class America will see the cost of new solar panels, storm and screen doors, ladders, RV's, windows and cars rise.

I fully understand the need to protect the supply of aluminum to our defense industry. But their relatively tiny volume, estimated at 200,000 metric tons, compared to the total US demand estimated at 9,067,000 metric tons, could probably be secured from one small smelter catering only to that industry and paid appropriately for that service.

Further, I am concerned that tariffs on primary aluminum would prompt retaliatory duties from countries, other than China, currently supplying the US with primary aluminum. Canada provides 58.6%, UAE provides 7.8%, Russia provides 22.1%, Central & South America provides 6.4%.

In summary, as a voter and as a taxpayer and as a consumer and as an aluminum industry worker I urge you to reconsider taking tariff action against primary aluminum imports to the United States.

Yours Faithfully,



**Antony R Harris**