

June 23, 2017

BY E-MAIL: Aluminum232@bis.doc.gov

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

RE: Section 232 National Security Investigation of Imports of Aluminum: Comments of the Association of Global Automakers, Inc.

Dear Mr. Botwin:

On behalf of the Association of Global Automakers, Inc. (Global Automakers), we submit the following written comments to the Bureau of Industry and Security (“BIS”) in connection with its national security investigation of imports of aluminum, pursuant to Section 232 of the Trade Expansion Act of 1962, as amended, 19 U.S.C. § 1862. These comments are submitted in accordance with BIS’ *Federal Register* notices, 82 Fed. Reg. 21509-11 (May 9, 2017) and 82 Fed. Reg. 25597-8 (June 2, 2017).

Global Automakers represents the U.S. operations of international motor vehicle manufacturers, original equipment suppliers, and other automotive-related trade associations. Our automobile manufacturer members include American Honda Motor Co., Aston Martin Lagonda of North America, Inc., Ferrari North America, Inc., Hyundai Motor America, Isuzu Motors America, Inc., Kia Motors America Inc., Maserati North America, Inc., McLaren Automotive Ltd., Nissan North America, Inc., Subaru of America, Inc., Suzuki Motor of America, Inc. and Toyota Motor North America, Inc. Our supplier members include Bosch, Delphi, Denso, NXP, and SiriusXM.

International automakers are an integral part of the U.S. automobile manufacturing industry. Combined, they have invested \$75 billion in U.S. facilities, produce 5.5 million vehicles annually (47 percent of all cars and trucks built by American workers each year)¹ and directly employ 130,000 employees throughout the United States. They have a combined payroll of

¹ Vehicles are made, built, or manufactured in the United States using domestic and globally sourced parts.

\$11.3 billion in the United States and purchase \$121 billion worth of parts, materials, goods and services annually from U.S. suppliers. Sixty percent of the U.S. jobs created by international automakers are directly related to the manufacture of vehicles and vehicle parts.

International automakers operate major manufacturing facilities in twelve states: Alabama, California, Georgia, Indiana, Kentucky, Mississippi, Missouri, Ohio, South Carolina, Tennessee, Texas, and West Virginia.

The manufacturing presence of Global Automakers and its member companies in the United States thus means that it has a substantial stake in policy decisions made with respect to aluminum. As you continue your investigation into aluminum and approach a decision, we urge you to take into account a number of factors.

First, any action taken should treat Canada, the European Union, and any other producers who have observed proper trade practices for aluminum fairly, perhaps even exempting them from the investigation.

Second, any proposed actions on aluminum should take into account how they affect important sectors of the economy that are major consumers of aluminum. In particular, automobile manufacturers in the United States have increased dramatically their use of aluminum in products, and are using it in a much broader range of applications every year, as part of the effort to find weight savings and improved fuel economy. Any action that would affect aluminum prices and availability for these applications would effectively place the government in a position of simultaneously advocating contradictory goals.

Third, any action on aluminum should include an appropriate and fair appeal process so that consumers of aluminum could petition for exclusion or relief where justified. This is standard practice with respect to anti-dumping and countervailing duty investigations.

We appreciate your consideration of these views, and ask that this letter be made part of the proceeding's public record.

Respectfully submitted,



John Bozzella
President and CEO