



June 20, 2017

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
Aluminum232@bis.doc.gov

Re: Comments on Section 232 Investigation of Aluminum Imports

Dear Director Botwin:

BorgWarner is a global product leader in clean and efficient technology solutions for combustion, hybrid and electric vehicles. With manufacturing and technical facilities in 62 locations in 17 countries, we company employ approximately 27,000 worldwide. BorgWarner has evolved from a powertrain supplier founded in 1928 to a propulsion company that is playing a major role in creating our vision of a clean, energy-efficient world. We supply to every major global Original Equipment automobile manufacturer.

Our company's origins date back to the 1880s in the U.S. and has grown to a \$9 billion publicly-traded company today. BorgWarner's growth in the last century is the result of the expansion of new markets due to public policies that supported international trade. As an American company headquartered in the U.S., we employ over 6,300 people in 16 manufacturing and technical centers in eight states across the United States.

Our company is a member of the Motor & Equipment Manufacturers Association (MEMA) 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 to request that if restrictions are placed on the importation of aluminum, the following products be excluded from the restrictions on aluminum:

Product	Country	Explanation	(HTSUS)
Cover	India	Foreign Producer Developed Specialty for our use	8481.90.9085
Cover	India	Foreign Producer Developed Specialty for our use	8481.90.9085
Cover	Korea, South	Foreign Producer Developed Specialty for our use	8481.90.9085

Housing	India	Foreign Producer Developed Specialty for our use	8481.90.9085
Housing	Korea, South	Foreign Producer Developed Specialty for our use	8481.90.9085
Cover	United States	Foreign Producer Developed Specialty for our use	8481.90.9085
Flange	India	Foreign Producer Developed Specialty for our use	8414.90.9080
Flange	Korea, South	Foreign Producer Developed Specialty for our use	8414.90.9080
Housing	India	Foreign Producer Developed Specialty for our use	8414.90.9080
Housing	Korea, South	Foreign Producer Developed Specialty for our use	8414.90.9080
SHIFT FORK	China, People's Republic of	Foreign Producer Developed Specialty for our use	8708.99.6890
SHIFT FORK	China, People's Republic of	Foreign Producer Developed Specialty for our use	8708.99.6890
BREATHER	Canada	Foreign Producer Developed Specialty for our use	8708.99.6890
CAM	Korea, South	Foreign Producer Developed Specialty for our use	8708.99.6890
CAM	Korea, South	Foreign Producer Developed Specialty for our use	8708.99.6890
Castings - Die - Machined/Finished - Aluminum	China, People's Republic of	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Machined/Finished - Aluminum	India	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Machined/Finished - Aluminum	Korea, South	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Raw - Aluminum	China, People's Republic of	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Raw - Aluminum	Germany	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Raw - Aluminum	Hungary	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Die - Raw - Aluminum	India	Foreign Producer Developed Specialty for our use	8483.90.8080
Castings - Gravity - Machined/Finished - Aluminum	India	Foreign Producer Developed Specialty for our use	8483.90.8080
CENTER BEARING SUPPORT	Korea, South	Foreign Producer Developed Specialty for our use	8708.99.6890
Housing	China	Not available in US	8414.90.4165
Housing	Great Britain	Not available in US	8414.90.4165
DIE CAST ALUMINUM	China, People's Republic of	Price of product/material is not available in the U.S..	8409.91.5085
Gasbox	Korea, South	Foreign Producer Developed Specialty for our use	8419.90.3000
Shell	China, Republic of (Taiwan)	Foreign Producer Developed Specialty for our use	8419.90.3000
Shell	Spain	Foreign Producer Developed Specialty for our use	8419.90.3000
Housing	India	Foreign Producer Developed Specialty for our use	8481.90.9040
Clutch	China, People's Republic of	Volumes not available in US	8483.60.4040
Clutch	Germany	Volumes not available in US	8483.60.4040
Clutch	Hungary	Not available in US	8483.60.4040
Clutch	India	Volumes not available in US	8483.60.4040



Clutch	Korea, South	Volumes not available in US	8483.60.4040
Fan Parts	Korea, South	Volumes not available in US	8483.90.8080
Fan Parts	India	Volumes not available in US	8483.90.8080
Fan Parts	Germany	Volumes not available in US	8483.90.8080
Housing	Brazil	Foreign Producer Developed Specialty for our use	8481.90.9040
Housing	China, People's Republic of	Foreign Producer Developed Specialty for our use	8481.90.9040
Plate	India	Foreign Producer Developed Specialty for our use	8481.90.9040

We appreciate this opportunity to offer input and request the abovementioned aluminum be excluded per Section 232. The list above is crucial to our U.S.-manufactured products that require types of specialty aluminum that are not available domestically.

The products we make with these specialty materials provide key essential vehicle propulsion technologies for improving fuel-efficiency, emissions, and performance. These technologies are critical in helping automakers meet federal regulations for Corporate Average Fuel (CAFE) standards and achieving better overall environmental conditions.

These technologies take many years to refine and often require specialized materials in its engineering and production. We have worked closely with these specialty aluminum suppliers to develop our products to ensure quality and affordability for our customers and consumers. Any major changes to our supply chain could hurt our engineering and manufacturing processes, delay production, and or jeopardize our ability to meet the vehicle production demands of the industry. If these aluminum exclusions are not granted, the cost of these types of products would increase and ultimately be passed onto the consumers in the overall price of the vehicle. Most importantly, a major shift in aluminum supply could hurt U.S. vehicle sales and therefore negatively impact U.S. automotive manufacturing jobs.

We would gladly share more insight about this matter if the information could remain confidential. Please feel free to reach out to me directly should you have questions or need more information. Thank you for your consideration.

Sincerely,

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