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

Dear Mr. Botwin:

Brazeway, Inc. of Adrian, Michigan, hereby files its comments on the Section 232 National Security Investigation of Imports of Aluminum, pursuant to the Bureau of Industry and Security's (BIS) request for comments contained in its Federal Register notice of May 9, 2017. 82 F.R. 21509 (May 9, 2017).

Brazeway is an extruder and fabricator of aluminum products based in the United States. It has plants in Hopkinsville, KY. and Shelbyville, IN. its administrative offices and headquarters are in Adrian, MI., where the company was founded in 1946. To this day, Brazeway remains a privately held company. Brazeway is a major extruder of aluminum tubing for the refrigeration and HVAC industries. It is the largest manufacturer of fin evaporator coils (FEC) in the United States. Brazeway leads the industry in enhanced tubing and hairpin products for both residential and commercial HVAC manufacturers. Brazeway is a leading supplier of micro-multiport and round tubing products for cooling and air-conditioning in the automotive industry and is the largest integrated supplier of evaporators, heat exchangers, connectors, and other system components to the refrigeration industry. Brazeway's customers include some of the largest refrigeration and air conditioning companies in the country. Brazeway has continued to expand its operations and investment in plant and equipment in the United States to service its domestic and multi-national customers. Brazeway's annual sales exceed \$190 million, and it employs approximately 290 people in the United States. For more on Brazeway, visit its website at www.brazeway.com.

Brazeway fully participated in the U.S. International Trade Commission's (ITC) recent section 332 investigation on aluminum imports from China. It testified at the hearing and submitted detailed briefs on China's unfair trade practices in the aluminum sector. Brazeway also participated in the current "sunset review" by the ITC of the antidumping and countervail duties imposed on Chinese imports of extruded aluminum products, testifying at the hearing and submitting detailed questionnaire responses. The ITC recently ruled in the domestic

industry's favor, finding likelihood of injury to the U.S. aluminum fabrication industry if the duties were revoked.

Brazeway was a party in the original investigations. The antidumping and countervailing duties imposed on Chinese imports of extruded aluminum products was instrumental in Brazeway's ability to increase investment and employment in the company. They made possible Brazeway's ability to be an industry leader in research and development. Without the duties to combat Chinese unfair trade in extruded aluminum products, Brazeway's very existence would have been threatened.

Brazeway, as a downstream producer, purchases its aluminum from smelters of prime aluminum, including Century Aluminum Co., which is located close to Brazeway's Hopkinsville plant in Hawesville, KY. Century is a major supplier of prime aluminum to Brazeway and is a strategic partner. Brazeway also purchases aluminum from smelters in Canada and the Middle East. Because of product specifications, Brazeway purchases high purity aluminum as compared to much of the extrusion industry, which buys 6000 series aluminum. It is critically important for aluminum fabricators in the United States to have an adequate and stable supply of aluminum at global competitive prices in order for them to compete effectively in the global market place. The health of Brazeway, and other similarly situated fabricators, and the industries which we serve, particularly HVAC, require access to smelters that can make 3000 series products in Canada and the Middle East.

The U.S. aluminum fabrication business is far larger than the prime aluminum smelting industry, and consequently is much more important to national economic growth and increased employment. Downstream production contributes almost 15 times the amount to GDP than primary production. There are only approximately 20,000 jobs in primary production, while over 520,000 work in downstream manufacturing. Wages in the downstream production are above the national average. Therefore, it is essential that in protecting U.S. primary aluminum production, downstream production not be harmed. Placing a blanket duty on all aluminum imports will do more harm than good. Increasing the cost of primary aluminum through tariffs or other measures will negatively impact the overall U.S. downstream sector, putting thousands of downstream jobs at risk. Downstream is a high value exporter, exceeding the value per ton of imports by an average of 25% by product. Harming the domestic downstream aluminum industry through high prices and limited supply of primary aluminum will have a negative effect on the balance of trade, costing jobs and adversely affecting the value of the dollar.

For Brazeway, margins in the refrigeration business are very tight and competition from imports is fierce. Brazeway is under constant pressure from its major customers to lower its prices. An appreciable rise in the cost of prime aluminum would put Brazeway's entire U.S. production base at risk. Currently, Brazeway is expanding capacity and jobs at its plants in the U.S. Any changes in relative primary aluminum prices could put these expansion plans in grave jeopardy and could result in Brazeway having to shift a significant amount of its production to other countries in order to remain competitive. Again, it is critical for the health of Brazeway's business that it have access to high quality prime aluminum from Canada and the United Arab

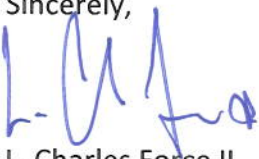
Emirates (UAE), as well as U.S. smelters, including Century, to ensure an adequate supply of 1000 and 3000 series aluminum at internationally competitive prices.

The economic pressure on the U.S. prime producers, including Century, is caused by China and China alone. Any trade remedial action must be tailored so that it affects China and not our close trading partners and allies. World demand for aluminum, particularly in the United States and Europe, is flat. China, however, is increasing production into this market at literally exponential rates. China has increased production over 50 percent in the last five years. China is adding a smelter a month to production. Global inventories are at record highs, exceeding normal historical levels by 300 percent. China is literally making aluminum for which there is no market and no demand outside of China. It is this predatory behavior that is putting U.S. smelters out of business and is threatening Century.

Brazeway stands by Century and supports import relief to protect Century and the remaining U.S. smelters, as well as to protect our country's national security. Brazeway, though, for the reasons stated, opposes a blanket duty that affects other countries that are not part of the problem. This applies especially to Canada and the UAE. Any section 232 relief must be carefully tailored to affect China alone. It is submitted that this can be done and be consistent with our World Trade Organization (WTO) obligations under Article XXI of the GATT, National "Security Exceptions," which provides relief from the obligations of the other Articles of the GATT, including Article I, "Most-Favored- Nation Treatment".

Brazeway thanks BIS for this opportunity to submit comments on this Section 232 National Security Investigation of Imports of Aluminum. If we may be of further assistance, please do not hesitate to ask.

Sincerely,



L. Charles Force II

Vice President - People and Procurement