



June 19, 2017

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

Re: Request for Comment: “Section 232 National Security Investigation of Imports of Aluminum”

Extrudex Aluminum Inc. welcomes the opportunity to comment on United States Department of Commerce’s “Section 232 Investigation on The Effect of Imports of Aluminum on U.S. National Security”.

Extrudex Aluminum Inc. manufactures aluminum extrusions and is located in North Jackson, Ohio USA. Our parent company is located in Woodbridge, Ontario Canada. Our plant in Ohio produces and supplies aluminum extrusion to US based manufactures mainly in the transportation, distribution and electrical markets. Our plant in Ohio was built in 1999 and employees more than 200 people.

Canada and the US share an integrated aluminum market and it is in our business’s interest, and the US’s interest more broadly, to maintain an open aluminum market between the US and Canada. There is significant cross border trade in aluminum between Canada and the US and the interruption of this trade, whether primary aluminum, semi-finished aluminum, or manufactured goods containing aluminum, would have consequences on US companies’ supply of inputs and export sales. Further, Canadian aluminum is sold, marketed and supplied to the US in a responsible and fair manner, and does not harm US aluminum producers or US national security.

In the case of our extrusion facility in Ohio, we rely on our parent company in Canada to supply some of our customer base here in the USA aluminum extrusions that are beyond our manufacturing capacity. In the case where certain extrusion tooling only exists in Ohio we supply our Canadian parent company extrusion requirements for their customers.

For these reasons, we submit that a 232 Measure against aluminum should not apply to Canadian aluminum or aluminum products.

Yours truly,

Brian K. Carder
General Manager

ALUMINUM EXTRUSIONS