



June 23, 2017

Brad Botwin
Director
Industrial Studies, Office of Technology Evaluation, Bureau of Industry and Security
U.S. Department of Commerce
Washington, DC 20230

RE: Comments on Section 232 National Security Investigation of Imports of Aluminum

Dear Mr. Botwin:

I am writing to clarify a point that I made at the June 22, 2017 Section 232 hearing on aluminum imports. At the end of my testimony I state that “broad and immediate relief for the aluminum industry is imperative” and that this includes “rigorously applying domestic sourcing policies in government procurement of aluminum.” I would like to clarify that by domestic sourcing policies in government procurement of aluminum, I am referring to “Buy America/n” requirements, which generally require that subject goods are produced or manufactured in the United States.

It is my understanding that neither the Department of Defense nor the Department of Transportation imposes a Buy America/n requirement on aluminum products. Should the President grant the domestic aluminum industry much needed Section 232 trade relief, this relief should not only include a tariff on all non-Canadian import sources, but *also* a requirement that aluminum used on a Department of Defense and Department of Transportation U.S. military or critical infrastructure project, whether as an end item or as a component or subcomponent, is produced in the United States. In order to ensure that such Buy America/n requirements are effective, these requirements should define produced in the United States to require that the aluminum content of the item must be produced from primary aluminum that is smelted in the United States and contain domestically generated aluminum scrap, as applicable.

Buy America/n requirements have been critical in the steel context and would help address, in part, the rising surge in imports resulting from Chinese excess capacity and production, which continues to cripple the domestic aluminum industry.

Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "John Adams". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

John Adams
Brigadier General, U.S. Army (Retired)
President, Guardian Six LLC