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VIA ELECTRONIC MAIL TO: 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: Comments on Section 232 Investigation of Aluminum Imports

Dear Director Botwin:

Magna International is a leading global automotive supplier with 321 manufacturing operations and 102 product development, engineering, and sales centers in 29 countries. We have over 159,000 employees focused on delivering superior value to our customers through innovative products and processes, and world class manufacturing.

We have complete vehicle engineering and contract manufacturing expertise, as well as product capabilities which include body, chassis, exterior, seating, powertrain, active driver assistance and vision, closure and roof systems. We also have electronic and software capabilities across many of these areas.

In the United States, Magna has 55 manufacturing operations and 13 product development, engineering, and sales centers in the United States that operate in 11 states. Magna employs 24,650 people and since 2011 has created more than 5,925 new U.S. jobs.

Our company is a member of the Motor & Equipment Manufacturers Association 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.

1. All aluminum material and product originating in Canada and Mexico. Canadian and Mexico suppliers of aluminum is part of the industrial base in the U.S., and is a seamless part of Magna's supply chain.
2. Aluminum coil as addressed below in Chart "A"

CHART "A"

Product for exclusion	HTS US	Country Source	Comments
Aluminum Coil (GS93033)		France	Capacity restraints from U.S. suppliers (supply is not sufficient)
Aluminum Coil (6014)		Belgium	Capacity restraints from U.S. suppliers (supply is not sufficient)
Aluminum Coil (5182)		Austria	Capacity restraints from U.S. suppliers (supply is not sufficient)

Aluminum is used for Magna production of automotive parts within the U.S. The inability to obtain aluminum will cause challenges to Magna in its ability to produce finished goods. We are concerned that U.S. production could decrease as a result, either through increased competition by imports of finished goods or by U.S. producers moving manufacturing to other countries so that aluminum can be accessed.

To discuss this issue further, please feel free to contact me at (248) 631-5555 or Scott.Paradise@magna.com.

Sincerely,



Scott Paradise
Vice President, Marketing & Business Development, Americas
Magna International, Inc.

c.c.
Motor & Equipment Manufacturers Association
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