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June 20, 2017

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: Section 232 of the Trade Expansion Act of 1962 investigation of imports of Aluminum; Comments

Dear Mr. Botwin:

I am Bryan L. Falk, Director, Strategic Sourcing for Printpack Inc. My department is responsible for sourcing all needed materials for our company, a \$1.3 Billion flexible packaging manufacturer headquartered in Atlanta, GA, with multiple manufacturing locations throughout the US, Mexico and China.

We have sourced foil from Chinese foil mills for the past 3 years, and today, 2/3rds of our requirements come from two Chinese mills, Nanshen and Shenhuo. We developed sourcing with these mills because of their ability to supply gauges less than 0.0003 mil, provide the widths that we need, and most importantly, meet the quality requirements that we and our end use customers have. The ability to source these requirements from US based manufacturing is non-existent as mills that had some of the capabilities to meet these demands exited the business.

We will suffer substantial hardship if these sources of supply became uncompetitive from the implementation of tariffs and duties associated with this action. In many applications, where we are a primary seller of foil based products to customers, those customers will suffer substantial hardship as well. Many of these customers are brands that we all purchase in our local grocery stores.

Please consider these hardships in making a decision about who would be really harmed if the suggested actions are implemented against foil originating from China.

Regards,

Bryan L. Falk

Bryan L. Falk
Director, Strategic Sourcing