June 20, 2017

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:

I am writing to inform the Department of Commerce’s Section 232 Investigation into aluminum imports.

Peerless Products, located in Fort Scott, Kansas has been manufacturing the highest quality commercial windows that are sold in the United States since 1952.

In the Fort Scott, we employ all most 400 people and are currently the largest employer in the county. We are a downstream business; thus we use imported aluminum billet and extrude it at our plant to produce the best quality and most thermally efficient windows that you can purchase. More information on our company and products can be found on our website www.PeerlessProducts.com.

Similar to other US manufacturers, we would like the products that we produce to be protected from low cost imports, however 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 our business and the overall US downstream sector putting over 500,000 downstream jobs at risk.

We are part of the downstream sector that is by far the largest employer and generator of economic opportunity in the US aluminum industry. In the past five years we have doubled our sales by improving our quality and reducing our costs. This has allowed us to add over 120 jobs within our company and invest in state of the art automation. We have recently added a $5 million state of the art paint line onto our facility. We were able to do this by financing thru our profits and working capital. Aluminum billet is one of our two largest materials that we purchase. Imposing a blanket duty on aluminum will increase our billet costs and negatively impact our sales and our ability to increase employment and invest back into our company. The blanket duty will put us at a
competitive disadvantage to foreign window competition within the US and reduce our sales and workforce. We urge you not to impose this blanket duty.

Please let me know if you need any other information.

Sincerely,

[Signature]

Donald W. Wheeler
Purchasing Manager
Peerless Products
2403 South Main
Fort Scott, Kansas 66701

cc. Lynn Jenkins
Jerry Moran
Pat Roberts