

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

Dear Mr. Botwin:

Pursuant to your request for public comment on the US Commerce Department's Section 232 national security investigation of steel imports, I am submitting these comments on behalf of Atlas Steel Products Co.

We consume stainless steel products in our production of Stainless Steel Air Filtration Systems. We source these products from various US and foreign companies. Our decision on sourcing stainless material is not based on the price of the steel, but rather on the quality and technical specifications of the material. We require a 304BA Stainless Steel with a surface quality of the highest standards. We have found that material from certain foreign sources, especially Aperam, meets our quality standards for the following reasons; a consistent surface, high gloss appearance, very low defect rate. We employ 95 people in the United States. In order to stay competitive, we must maintain the kind of quality product that we are able to produce from Aperam stainless steel.

Moreover, the limited amount of steel we source from these foreign mills can have no broader impact on U.S. steel producers or the national defense requirements of the United States. U.S. steel companies command the vast majority of the U.S. market for stainless steel, a situation that has vastly improved for them with the Commerce Department's final decision in the antidumping and countervailing duty cases against imports of stainless steel sheet and strip from China. Those prohibitive antidumping and countervailing duty margins that will be imposed once the International Trade Commission makes its final decision will remove producers at the lower end of the U.S. market for these products. Moreover, there is no shortage of production of U.S.-made stainless steel and sufficient demand so that those companies will not lose any edge that could possibly have an impact on national defense requirements.

This is a case in which an industry that has recently successfully brought trade cases on stainless sheet and strip from lower-priced producers does not need further protection from companies selling at the high end of the market and countries that are long-term U.S. allies. At the same time, companies like Aperam and Atlas Steel Products Co. should not be the victims of such unnecessary market interference. While I can't speak for all parts of the steel industry, there is no need for the Commerce Department to take any action concerning imports of stainless steel products, particularly stainless steel sheet and strip, as there is no crisis in this market and no reason to conclude that there is any link between imports and the national defense needs of the United States.

Sincerely,

Jim Sayre
Atlas Steel
Vice President - Purchasing

