



STAMPING & WASHER SPECIALISTS SINCE 1919

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May 30, 2017

Brad Botwin  
Director, Industrial Studies  
Office of Technology Evaluation  
Bureau of Industry and Security  
U.S. Department of Commerce  
1401 Constitution Avenue, N.W.  
Washington, DC 20230

via e-mail: [Steel232@bis.doc.gov](mailto:Steel232@bis.doc.gov)

***RE: Request for Public Comments on Section 232 National Security Investigation of Imports of Steel***

Dear Mr. Botwin:

On behalf of Boker's Inc. located in Minneapolis, MN with 118 employees, thank you for your focus on supporting manufacturing. Boker's is an industrial consumer of steel making, we are a Contract Manufacturer of Precision Stampings and Washers since 1919, for the defense and aerospace industry among others. Steel accounts for roughly 26% of our raw material costs, and roughly 28% of our steel is imported. Regardless of the amount we source from abroad or domestically, companies like ours across the U.S. rely on globally priced raw materials. We are concerned that narrow findings in a 232 investigation into imported steel may result in tariffs or import quotas that will increase the price of our products and lead to more imports of our competitors' products duty free.

Simply shifting the injury from steel producers to thousands of industrial steel consuming businesses such as our company will put our nation's security at risk and jeopardize our warfighters and missions abroad. Domestic steel producers cannot currently meet demand on a timely basis particularly depending on the alloy. Customers have a multitude of sourcing options globally and American businesses cannot afford to face further disadvantages. Even the slightest price increases or delays in delivery can result in a canceled contract or missed opportunity.

We ask that any action taken include steel consuming manufacturers who manufacture a product characteristically similar to the steel being protected by tariffs or quotas. Current duties imposed by the Department of Commerce can last ten, fifteen years, and even longer without consideration of short supply or changed circumstance. The administration should expand its review of the 232 to include downstream products made of steel that bear similar characteristics.



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Manufacturers face many challenges imposed by our own government from EPA to OSHA to taxes, imposing tariffs or Washington restrictions on imports of our most important input could cripple our industry for years. The steel 201 tariffs caused countless metal stampers to shutter their doors following the imposition of a 30% tax on steel imports virtually overnight. Even for companies not importing steel, the action drastically altered the markets and led to the loss of American jobs.

As a small middle market manufacturer, we play a critical, although less visible role, in protecting our nation. Companies like ours produce components that allow our pilots to fly, our weapons to target, and our equipment to function in difficult conditions. On behalf of our company and employees, we ask that you consider the impact any restrictions on steel imports or increase in prices will have on the U.S. economy and downstream manufacturers.

Thank you for your consideration and work to strengthen manufacturing in the U.S.

Sincerely

A handwritten signature in blue ink that reads "Mark Kersey".

MARK KERSEY

VICE PRESIDENT



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