



May 31, 2017

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  
Steel232@bis.doc.gov

Re: Comments on Section 232 Investigation of Steel Imports

Dear Director Botwin:

BorgWarner is a global product leader in clean and efficient technology solutions for combustion, hybrid and electric vehicles. With manufacturing and technical facilities in 62 locations in 17 countries, we company employ approximately 27,000 worldwide. BorgWarner has evolved from a powertrain supplier founded in 1928 to a propulsion company that is playing a major role in creating our vision of a clean, energy-efficient world. We supply to every major global Original Equipment automobile manufacturer.

Our company's origins date back to the 1880s in the U.S. and has grown to a \$9 billion publicly-traded company today. BorgWarner's growth in the last century is the result of the expansion of new markets due to public policies that supported international trade. As an American company headquartered in the U.S., we employ over 6,300 people in 16 manufacturing and technical centers in eight states across the United States.

Our company is a member of the Motor & Equipment Manufacturers Association (MEMA) 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 Steel. We are providing these additional public comments to request that if restrictions are placed on the importation of steel, the following products be excluded from the restrictions on steel:

Product	AISI Code	Harmonized Tariff Schedule of United States (HTSUS)	Country	Explanation
Clamp plates	A607	7326.90.8587	Great Britain	NOT AVAILABLE

Clamp plates	A607	7326.90.8587	Great Britain	NOT AVAILABLE
Circlips/ Snap rings	EN 1.4301	7326.90.8587	Great Britain	NOT AVAILABLE
Gaskets	AISI 321	8484.10.0000	Great Britain	NOT AVAILABLE
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Gaskets	AISI 321	8484.10.0000	Great Britain	NOT AVAILABLE
Spacers	A286, AISI 660	7318.29.0000	Germany	NOT AVAILABLE
VTG-Pin	AISI 314	7318.29.0000	Germany	NOT AVAILABLE
Misc semi-finished	AISI 430 / 431	8414.90.0000	Germany	NOT AVAILABLE
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Clamp plates	AISI 321	7326.90.8587	Germany	NOT AVAILABLE
Clamp plates	AISI 321	7326.90.8587	Germany	NOT AVAILABLE
Heat shields	AISI 314/314L	8414.90.4175	Germany	NOT AVAILABLE
18CrNiMo7-6 wire		7223.00.5000	Italy	NOT AVAILABLE
50CrV4 wire		7217.10.8020	Italy	NOT AVAILABLE
440B wire		7223.00.1061	Italy	US SUPPLY NOT SUFFICIENT; FOREIGN STEEL PRODUCER DEVELOPED SPECIALTY STEEL FOR OUR USE
1055Nb strip		7217.10.7000	Japan, Germany	FOREIGN STEEL PRODUCER DEVELOPED SPECIALTY STEEL FOR OUR USE
501C wire		7223.00.1076	France	FOREIGN STEEL PRODUCER DEVELOPED SPECIALTY STEEL FOR OUR USE

We appreciate this opportunity to offer input and request the abovementioned specialty steel be excluded per Section 232. The list above is crucial to our U.S.-manufactured products that require types of specialty steel that are not available domestically. The products we make with these specialty materials provide key essential vehicle propulsion technologies for improving fuel-efficiency, emissions, and performance. These technologies



are critical in helping automakers meet federal regulations for Corporate Average Fuel (CAFE) standards and achieving better overall environmental conditions.

These technologies take many years to refine and often require specialized materials in its engineering and production. We have worked closely with these specialty steel suppliers to develop our products to ensure quality and affordability for our customers and consumers. Any major changes to our supply chain could hurt our engineering and manufacturing processes, delay production, and or jeopardize our ability to meet the vehicle production demands of the industry. If these steel exclusions are not granted, the cost of these types of products would increase and ultimately be passed onto the consumers in the overall price of the vehicle. Most importantly, a major shift in steel supply could hurt U.S. vehicle sales and therefore negatively impact U.S. automotive manufacturing jobs.

We would gladly share more insight about this matter if the information could remain confidential. Please feel free to reach out to me directly should you have questions or need more information. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Erika Nielsen". The signature is fluid and cursive.

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