



**Bridgestone Metalpha U.S.A., Inc.**  
570 International Blvd.  
Clarksville, TN 37040

May 22, 2017

Brad Botwin  
Director of Industrial Studies  
Office of Technology Evaluation  
Bureau of Industry & Security  
U.S. Department of Commerce  
1401 Constitution Ave NW, Room 1093  
Washington, DC 20230

Re: 1070 and 1080 Steel Wire Rod from International Producers

Mr. Botwin,

I am writing you concerning the recent notification of a Request for Public Comments on Section 232 National Security Investigation of Imports of Steel. My company is a consumer of steel wire rod for the production of steel cord for the tire industry.

We are concerned about the breadth of the investigation as there are no boundaries as to the types of steel that are included in this investigation or in any remedy that may be imposed. There are many different types of steel and steel products. No steel mill produces all steel products and grades. Therefore, we suggest such a broad brush approach is not helpful in deciding which if any steel imports threaten the national security.

To make steel cord for the tire industry, Bridgestone Metalpha U.S.A, Inc. uses grades 1070 and 1080 steel cord grade wire rod. These grades of wire rod are produced by only 1 United States mill. Similarly, these grades are produced by only a few mills internationally. Japanese mills as well as other foreign sources have been a long time and reliable source of this wire rod. Accordingly, Bridgestone Metalpha must use some 1070 and 1080 grades of steel wire rod imported from international sources to satisfy its demand.

If the Department of Commerce continues to approach this investigation on an all steel imports basis, it must recognize that not all types of steel imports are a threat to the national security because of their source or their uniqueness. Both of these reasons are true in this case. The 1070 and 1080 wire rod comes from foreign sources. In particular, Japan is one of the most important allies to the U.S. and is critical to U.S. interests in Asia. Indeed, taking action that negatively impacts Japan or any other ally would be detrimental to the national security of the U.S. Additionally, restricting US imports of 1070 and 1080 wire rod from sources outside the country would have a negative impact on Bridgestone Metalpha and its employees in the U.S. If materials to produce steel cord are not readily available in the US, steel cord

imports will replace US steel cord production. Thus, an action that is taken to prevent harm to the US national security in the steel sector will likely have a significant negative impact on US national security overall – less U.S. steel cord production capability. Additionally, if this were to happen it could have a negative effect on other Bridgestone subsidiaries located in the United States.

For the foregoing reasons, we ask that the Department consider the need of Bridgestone Metalpha U.S.A., Inc. for 1070 and 1080 steel wire rod and exempt it from any remedy resulting from this investigation.

Sincerely,

A handwritten signature in black ink, appearing to read "Bruce Johnson", with a long horizontal flourish extending to the right.

Bruce Johnson  
President & CEO  
Bridgestone Metalpha U.S.A., Inc.