



BUSINESS + INSTITUTIONAL FURNITURE MANUFACTURERS ASSOCIATION

May 30, 2017

Secretary Wilbur L. Ross, Jr.
U.S. Department of Commerce
1401 Constitution Ave., NW
Washington, D.C. 20230

**Re: Section 232 National Security Investigation of Imports of Steel;
Request to Define and Limit the Categories of Steel Products Subject
to Import Adjustments**

Dear Mr. Secretary:

BIFMA is the trade association for business and institutional furniture producers. Since 1973, we have served as the voice of the commercial furniture industry. We are an international trade association with 322 manufacturers, suppliers, and service providers to the industry. Our core membership is based in North America and we believe that the Department should seriously consider the negative economic impact of any import adjustment on industries that use steel and define and limit the categories of steel products covered accordingly.

It is difficult to imagine how it is in our national security or national economic interests to impose tariffs or quotas that risk thousands of jobs in steel-consuming industries. Disregarding or discounting the economic impact of adjustments on consuming industries could have serious and unintended consequences. We urge the Department to refrain from, or carefully limit, any import adjustment recommendations.

Any adjustment to steel imports is likely to increase steel prices domestically. Adjustments that restrict supply and increase costs domestically will cause significant, negative financial consequences for companies. A sudden increase in material costs would be extremely detrimental for our members and the customers that they supply including schools, units of government, leading businesses who purchase furniture products, small and medium manufacturers from whom they buy goods and services, family-owned dealers who sell this industry's products across the country, and the direct and indirect employees of the entire value chain. We urge the Department to take into consideration the serious ramifications to steel-consuming manufacturers while considering any recommendation it may make to the President.



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Should the Department feel compelled to make adjustment recommendations, we implore the Department to tailor those recommendations carefully to enhance national security and avoid harming steel-consuming, American manufacturers. Our members purchase a wide range of downstream products from domestic and non-domestic sources for use in the production of office furniture. Imposing trade remedies on imports of “input” products, including but not limited to, stamped/formed metal used to make brackets and frames; gas cylinders used for seating adjustability; mechanisms like drawer slides and chair controls; steel tubing for frames and chair legs; hardware including nuts, bolts, and screws; and welded assemblies used for frames and chairs, would force companies to either absorb the increased costs or raise prices on finished products, which hurts our global competitiveness. These consequences will harm activities and employees across our U.S. locations.

For these reasons, we respectfully request that the Department refrain from adjustment recommendations that will artificially inflate domestic steel prices. Should the Department proceed with adjustment recommendations, we ask that the recommendations narrowly define and limit the categories of steel products to those critical for national security. We would be pleased to work with the Department to help identify and define categories of downstream commercial steel products that should not be subject to import adjustments.

If you have any questions regarding this matter, please do not hesitate to contact me directly.

Sincerely,

A handwritten signature in black ink that reads "Bradley P. Miller". The signature is written in a cursive, slightly slanted style.

Brad Miller
Director of Advocacy & Sustainability
Business and Institutional Furniture Manufacturers Association (BIFMA)
Telephone: 616-980-9797