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May 31, 2017

Dustin Smith Vice President, Sales and Marketing Copperweld Bimetallics, LLC 254 Cotton Mill Road Fayetteville, TN

Mr. Brad Botwin Director, Industrial Studies U.S. Department of Commerce 1401 Constitution Avenue NW Room 1093 Washington, DC 20230

Dear Mr. Botwin:

I am writing to request that you consider adding Copper-Clad Steel (CCS) wire to the upcoming Section 232 hearing.

Copper-Clad Steel (CCS) is a product created through the metallurgical bond of steel and copper. Copper-Clad Steel was first invented, in 1915, by Copperweld Bimetallics, in Rankin, PA. For more than 102 years, Copperweld has continued to manufacture the only American Made Copper-Clad Steel product. Located in Fayetteville, TN, Copperweld is proud of its ability to utilize local labor, domestic suppliers, and maintain a manufacturing facility in the United States. Copper-Clad Steel is utilized as a grounding conductor within the oil/gas, energy, detonation, and other segments of the U.S. economy that relate to U.S. national security. The quality and reliability of this product is paramount in ensuring the country's electrical infrastructure is secure and operational. Recently, Copperweld has experienced increased competition from



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a Mexican importer that is providing an inferior product, both direct and through a domestic distributor, AFL Global, into our nation's electrical grid and renewable energy infrastructure. The generic nature of a Copper-Clad Steel product allows for inferior materials and manufacturing processes, entering the economy, to become easily associated with Copperweld. The continued presence of inferior imported material in the United States is detrimental to the U.S. economy, the bimetallic industry and to Copperweld Bimetallics, an American company with more than a 100-year track record of excellence through some of the most difficult economic and military challenges that our nation has overcome.

On behalf of Copperweld Bimetallics, LLC and its employees, I request that you consider the threat to the U.S. economy, our infrastructure and national security, and to the future of Copperweld, that inferior Copper-Clad Steel imports create when you consider the implications and outcome of the upcoming 232 hearing.

**Dustin Smith** 

Vice President, Sales & Marketing

Copperweld Bimetallics, LLC