

**750 Town & Country Blvd
Suite 920**

Houston, TX 77024

Tel: 281-752-7300

Fax: 281-752-7303

www.cpwamerica.com

DOC - Section 232 Investigation
Attn: Brad Botwin, Director, Industrial Studies
Office of Technology Evaluation
Bureau of Industry and Security



CPW America Co.

Dear Mr. Botwin,

Thank you for the opportunity to add our comments to the Section 232 Investigation,

CPW America Co.(CPWA) is a C Corp registered and located in Houston, Texas since 2000. Our company has invested in 10 full time employees with a primary focus on selling Steel pipe and coating for the construction of pipelines in the USA. We are foreign owned by a world class pipe manufacturer, Corinth Pipeworks S.A., located in Athens and Thisvi, Greece. We are a quality driven supplier of imported steel pipe and coatings to the oil and gas industry in North America.

As a supplier of pipe and coatings to most of the major US Oil and Gas companies, and many US pipe distribution companies we would like to ask that the Panel for this 232 Investigation to carefully consider the domestic availability and capacity to meet the very stringent technical requirements of the oil and gas pipeline industry in the USA.

CPWA has respected the domestic markets with Fair Trade by choosing to primarily concentrate on sizes, grades and products that have either in the past or presently are not made due to capacity issues, domestic steel supply availability or mill capability from the domestic pipe makers. Our products are made in Greece with no foreign subsidies. Also, our Greek products have not been named in any prior tariff or quota investigations.

We ask the panel when reviewing the “Economic welfare of the US Steel Industry” to look at the many US Citizens and businesses that add a very positive impact through imports, such as the many downstream businesses as highlighted later in this document. Please also take into consideration the unemployment and decrease in revenues of our government should the Ports of entry be idled by tariffs or sanctions.

CPW America Co. – Positive US Commerce generated due to our participation in US Pipeline Projects

Year	Vessel Count	Barge Count	Truck Loads of Pipe Shipped
2015	16	0	13,122
2016	9	30	4,823
Total	25	30	17,945

Activity	2015 Truck Miles	2016 Truck Miles
Domestic Miles Driven Delivering Pipe	3,882,882	2,652,242

2015-2016 Total US Miles Driven: 6,535,124

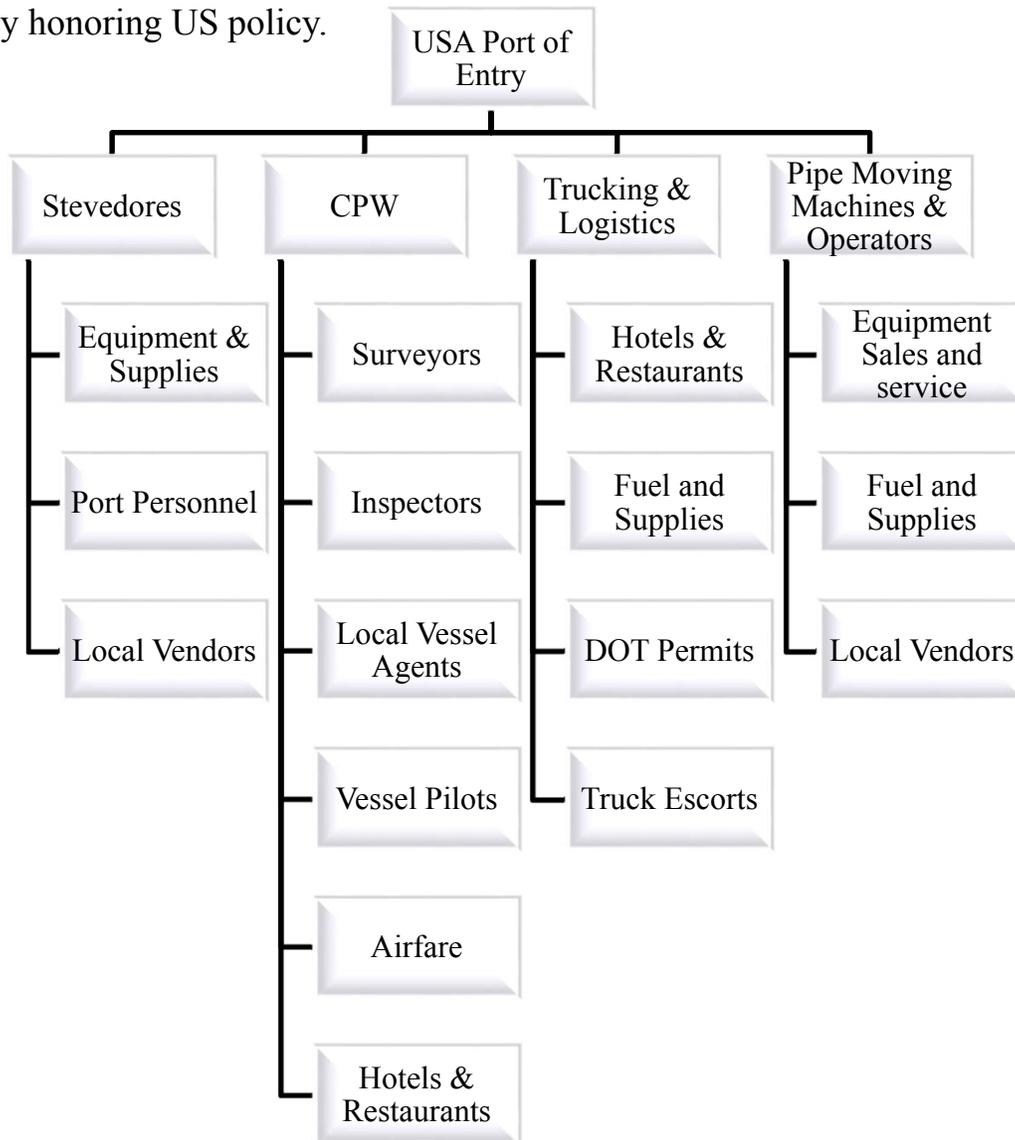
Activity	2015 Man Hours	2016 Man Hours
Inside Port Pipe Movements	35,328	19,872
Outside Port Pipe Movements	151,330	78,810
Totals:	186,658	98,682

2015-16 Total US Man Hours: 285,340

CPWA Positive Commerce generated downstream with Ports, Stevedores, Trucking Companies and others delivered Safely and Responsibly

CPW America Co. –Positive US Commerce generated due to our participation on US Pipeline Projects

In closing, we at CPWA are very concerned the final result of this 232 Investigation could lead to import sanctions and/or trade actions that could greatly affect our business in the USA. As we have demonstrated, we have a very positive impact on local and state businesses through our downstream activities below. CPW America has and will continue to be committed to the US National Security and Fair Trade practices of our country by honoring US policy.



Thank you for allowing us to offer comments to this investigation. Should you have further questions or require documentation please contact our office.

Sincerely,

Dianne Burger, President of CPWA