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May 30, 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

Re: Comments on Section 232 Investigation of Steel Imports Request
for Exclusion of Certain Steel Products

Dear Director Botwin:

I am the President of DB&S Steel. Our company purchases tool steel sheet and produces precision ground flat stock items for a large group of metal distributors throughout the United States. Precision ground flat stock is a core product that is used by many U.S. manufacturers and other end-users.

Our company currently employs 26 individuals. Our production facility and offices are located in Beaver Falls, Pennsylvania. My partner, Robert Garland, and I have invested heavily in the assets of the business and we plan to add production machinery and workers as we grow the business over the next several years.

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, I provide the following comments.

DB&S Steel requires steel in various grades that is 3/8" thick or thinner. In other words, we need very thin gauge sheet that ranges from 1/64"

thick to 3/8" thick. More specifically, our highest volume products require steel that is 3/16", 1/4", 5/16", and 3/8" thick.

DB&S Steel sources the steel sheet necessary for our manufacturing operations from foreign sources because no U.S. mill has the capacity to produce sheet at the required thicknesses. We have tried to source domestically, but we have only been able to find tool steel material that is thicker than 3/8". Therefore, foreign sources are essential to our operation and our viability as a business and employer.

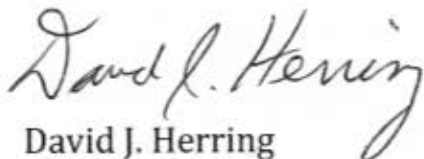
Our current steel sheet supplier is Bohler, a voestalpine mill based in Austria. Sourcing from Bohler allows us to maintain our competitiveness as a U.S. producer in competition with finished products and items imported directly from China, thus securing good paying manufacturing jobs in the United States.

Should we not be able to source steel sheet from Bohler, we would have to reduce our production workforce considerably, consider purchasing only finished items from a foreign source, and possibly shut down our manufacturing operation altogether.

As you can understand, I am very concerned about the Department's investigation. Having access to foreign steel sheet allows DB&S Steel to survive, grow, and provide jobs to U.S. workers. Although I would prefer to source steel sheet from domestic producers, no U.S. steel producer offers the type and quality of steel sheet that we require. For the niche applications we fulfill, Bohler offers DB&S Steel the reliable, high-quality product and service that allow us to be an essential and viable U.S. manufacturer.

I would be happy to provide additional information if that would be helpful to you. Please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script that reads "David J. Herring". The signature is written in black ink and is positioned above the printed name and title.

David J. Herring
President