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

**Re: Section 232 Steel Investigation**

Dear Mr. Botwin:

These comments are filed on behalf of Decra Roofing Systems (Decra) in response to the Department of Commerce's request for comments in the 232 investigation of steel. This investigation covers "steel" without any further clarification of the scope of the products covered or the circumstances under which certain products will be covered.

Unfairly traded steel may pose a security risk to the United States. However, a blanket remedy that would cover both fairly and unfairly traded steel would only hurt US manufacturers. While restricting all imported steel to the United States may help US steel producers, it would ultimately hurt all of the users of steel and hurt the security of the United States by increasing costs and decreasing the global competitiveness of US manufacturers generally.

Decra is just one example of the harm that such a global blanket remedy could cause. Decra has a manufacturing facility in Corona, California. This facility purchases galvanized steel coils that are stamped into

various roofing tile shapes, including shingles, shakes and tiles. For improved production efficiencies, Decra imports as appropriate steel from abroad as well as semi-finished roofing tiles from New Zealand, where Decra's parent company is based. The imported semi-finished tiles are then coated at the Corona, California facility. Without the availability of fairly traded steel imports, jobs could be lost in California.

Decra respectfully requests that if the administration decides to impose duties, quotas or some other remedy, the remedy should be targeted to address unfairly traded imports while allowing US manufacturers the ability to continue to source fairly traded imports globally.

Very truly yours,

Raul Rosado, Jr.  
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