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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 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:

My name is Jeff Bartusek and I am the current President of Drill Rod & Tool Steels, Inc. I am the second generation of my family to lead our company. My father, George Sr, and Uncle, Robert, founded the company in the early 1960's. My siblings, George Jr. and Lisa have played vital roles in the company's growth over the years as well as my two eldest sons whom have taken on roles in the last 5 years. We operate in Franklin Park, IL and employ anywhere from 20-25 skilled warehouse employees. We mass produce precision ground flat stock and sell to distributors in the United States and Canada.

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, we would like to make the following public comments.

We have the ability to work with all annealed and magnetic tool steels, but our core competency is working with A-2, O-1, S-7, D-2, and 4140/4142 p/h steel. We source 90% of our raw material from foreign sources. We source 100% of our raw material under .500 thick from foreign sources. We have chosen to source from foreign mills because of the lack of domestic supply and reliability, poor quality, increased waste, and increased time and labor.

First, and most important, the supply of domestic tool steel grades, which we work with, to support the industry in the United States is nonexistent. None of the petitioners or

other domestic mills produce large quantities of tool steel sheet to support our product line. We have purchased steel plate from domestic sources (plate is considered over .500 thick) in the past. We have received our orders months late and left with considerable waste due to their manufacturing capabilities not aligning with the standard items within the industry.

Secondly, our foreign sources supply us with material that has minimal decarb and aligns perfectly with the standard sizes within the United States precision ground flat stock industry. For example, in order for us to make a piece of .250 x 1.00 x 36 A-2 flat ground, we import steel with a starting thickness of .271/.289, a starting width of 36.375", and a length of 73". From that sheet we only have to remove a maximum of .039 and there are no drops or waste from the width and length due to the sheet size. Domestic sources have offered to make us a .375 thick material to make .250. That will almost triple our labor time to produce standard sizes and there is additional waste due to the width and lengths of the sheet not being conducive to industry standards. Not only would using this material triple our internal production costs, but due to the amount of work that would need to be done to it, the quality of product would suffer. The steel will be work hardened and much more difficult for our customers to work with.

Our current foreign supplier is Bohler, a voestalpine mill based in Austria/Europe. Sourcing from Bohler allows us to maintain our competitiveness against imports of finished products from China and India thus securing well payed jobs in the United States.

We have to source our raw material from foreign mills, mainly Bohler in Austria. The quality, reliability, service, and manufacturing flexibility they provide is second to none in the tool steel industry. There is currently no domestic supply that will allow us to continue supplying our product to other manufacturers in the United States. The product domestic mills have offered triples my internal cost and lead time. Our niche industry cannot support a significant tariff on tool steel items that are not available domestically. This tariff will cause a significant roll back in employment in the tool steel sector and cause many of the products currently manufactured here to be shipped offshore.

Dear Mr.Botwin, I'm very concerned about this investigation. Having access to those products mentioned above allow my company to compete on the global market place. It is vital for the technical development of my company to have access to the most advance steel products that fit my purpose. I would prefer to source such products from an US Steel producer, but no US steel producer has offered the quality and the service that I require. For the niche applications that I need, Bohler has offered me the product, the reliability of the quality and the service that allows me to concentrate on my customers and the performance of my products.

Please don't hesitate to contact me, if you need further information


PRESIDENT