



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, NW – Room 1093
Washington, DC 20230

RE: Comment on Section 232 National Security and Request to Exclude Laminated Tin-Free Steel from Section 232 Investigation and Tariffs and/or other Restrictions

Dear Mr. Botwin:

DS Containers is a privately held and expanding company with its headquarters in Batavia, IL and manufacturing plants in Batavia, IL and West Chicago, IL. DS Containers manufactures aerosol and liquid pour cans used for food, cosmetics, and every day household products. DS Containers is a twelve year old company that has revenues approaching \$200 million and currently employs approximately 200 American workers.

The container that DS Containers manufactures utilizes state of the art technology in manufacturing and materials which increases the shelf life of the product. The main material utilized is plastic laminated, tin-free steel. The laminated tin-free steel has similar characteristics as tinplate steel minus the tin and with an ultra-thin laminated plastic film. The laminated steel is completely recyclable in local recycling programs and by its very nature is BPA free and emits no volatile organic compounds. The vast majority of these cans are used to package consumer products. In 2017, DS Containers expects to consume 70,000 tons of laminated steel and produce in excess of 700 million cans.

The laminated steel is a unique product especially developed for the manufacturing process. The product is not available from US steel mills and cannot be purchased in the United States. DS Containers has no knowledge that any investment is being made by US steel mills to produce a laminated tin-free steel product. Additionally, the US steel mills cannot produce the tin-free steel substrate to the required specification and quality. DS Containers believes a separate category of laminated, tin-free steel requires its own consideration and examination as it is not used in any US defense or national security applications.

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A tariff or other restrictions placed on laminated tin-free steel would provide economic harm because:

- i) the material specification is not available in the United States;
- ii) it would put these cans at a cost disadvantage among competing packages;
- iii) it would result in the loss of existing American jobs;
- iv) it would damage future growth and eliminate plans to hire additional American workers in the coming months; and
- v) it would jeopardize the viability of DS Containers as a business entity.

DS Containers requests the Department of Commerce excludes laminated tin-free steel from this investigation or any future consideration of tariffs or restrictions.

Please contact me or Matt Kuehn (Vice President) at 630-482-7266 or mkuehn@dscontainers.com with any questions or comments. Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Bill Smith". The signature is fluid and cursive, with a large loop at the top.

Bill Smith
President & COO
DS Containers, Inc.
Phone: 630-406-9600
Email: bsmith@dscontainers.com