



May 30, 2017

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

*via e-mail: Steel232@bis.doc.gov*

***RE: Request for Public Comments on Section 232 National Security Investigation of Imports of Steel***

Dear Mr. Botwin:

On behalf of E&E Manufacturing located in Plymouth, MI and Athens, TN with 785 employees, thank you for your efforts to attract attention to manufacturing. E&E is a metal stamping company manufacturing heavy gage stamped metal fasteners, progressive die metal stampings, and high value added assemblies. We serve the military, heavy truck, automotive, and other industries as a Tier I and II supplier. In some cases, steel can account for 70 percent of our input costs for a few products, meaning even the slightest change in prices can make our company globally uncompetitive.

While we do not currently import steel, E&E relies on globally priced and available steel to meet our defense customers' needs. Any disruption or price increases can send ripples throughout the supply chain and jeopardize our business and employees across two states. We witnessed firsthand how the steel 201 tariffs imposed more than a decade ago devastated the metal stamping industry. We are concerned that the 232 investigation could result in a similar situation where the administration to impose tariffs or import quotas on steel.

Even when companies like ours are able to pass the cost along to a customer, that makes the final product more expensive, less attractive to potential buyers, and costlier to U.S. taxpayers. As a business owner, I am always concerned about government intrusion and believe free markets should dictate prices. However, I recognize that we need robust and enforceable trade laws to counter unfair competition but we risk causing great harm to millions of American steel consuming workers in an effort to solve a problem which may not exist to the extent it once did.

Imposing duties or restricting the availability of steel in the U.S. will increase prices for thousands of companies like ours. As a third generation manufacturing business, we are making investments today for our future and need the support of our government to make sure we remain globally competitive. Our own government increasing the price of our most important input could set our economy back years and allow foreign competitors to take our place.

Fax Numbers

734-207-7565 Accounting · 734-451-4421 Administration  
734-451-8586 Quality · 734-451-8283 Plant Manufacturing  
734-207-1873 Engineering/Corp. Purchasing · 734-354-3310 Plant Purchasing  
734-451-6414 Human Resources



I ask that you consider not only the impact your decisions will have on downstream steel consuming industries, but also on how to make sure that any action taken either includes businesses like ours or provide for some protections and exclusion procedures to lessen the injury on our company. We are concerned that protecting one smaller segment of the manufacturing sector at the expense of a much larger portion will cause serious harm.

As the customers of steel producers, we cannot survive without a healthy domestic producing industry and they of course cannot succeed without customers who can compete globally. Thank you for your work on this issue and I look forward to working with you in the future.

Sincerely

A handwritten signature in blue ink, appearing to read "Wallace E. Smith", written in a cursive style.

Wallace E. Smith  
President

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