

May 31, 2017

VIA ELECTRONIC MAIL TO: Steel232@bis.doc.gov

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

Freudenberg-NOK
 Sealing Technologies
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Matt Portu
 President
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Re: Comments on Section 232 Investigation of Steel Imports

Dear Director Botwin:

As a market-leading technology specialist in sealing applications, Freudenberg Sealing Technologies (FST) is a supplier as well as a development and service partner for customers across a wide variety of industries including the automotive industry, civil aviation, machine-building, ship construction, the food and pharmaceutical industries, and the agricultural and construction equipment industries.

In the U.S., FST currently has approximately 3,900 employees working in 18 different locations in the states of California, Georgia, Indiana, Michigan, Minnesota, New Hampshire, South Carolina, Texas and Wisconsin.

Our company is a member of the Motor & Equipment Manufacturers Association and we endorse the comments being filed by MEMA 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 are providing these additional public comments to request that if restrictions are placed on the importation of steel, the following products be excluded from the restrictions on steel.

Product for exclusion	AISI Code	Current Source Location	Explanation why imports are needed of this product
Cold Drawn Mechanical Tubing	ASME SA-372 Grade E class 70	China	NO US SUPPLY
High Strength Low Alloy steel	SAEJ2340	Europe	US SUPPLY NOT SUFFICIENT or COST EFFECTIVE

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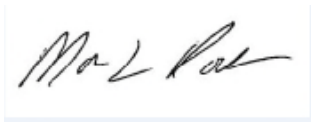
If we are not able to obtain the steel we need for the cold drawn mechanical tubing, the part we produce using this material would have to be honed, cut and machined in China. Alternatively, we would have to use hot finished mechanical tubing that would then need to be honed, bored and machined to meet the cold drawn tolerances, which would impose upon us a large cost impact.

For the High Strength Low Alloy Steel (HSLA), the current European supply base provides hot-rolled steel out of Europe that meets the SAE specification. U.S. manufactured HSLA to the SAEJ2340 specification has to be cold-rolled to meet thickness tolerances and surface finish requirements which are additional processes that add cost and limit supply options.

As noted, if the requested exclusions are not granted, the goods produced that use the referenced steel products will become more costly to produce and result in our U.S. locations becoming less competitive and subject to an increased risk of loss of sales to foreign manufacturers. Should loss of sales result, a corresponding decrease in production would occur. Such decrease in production if severe, could result in workforce reduction.

Please contact me at 734-354-5563 if you need any additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Mat Portu", enclosed in a light blue rectangular box.

Matthew L. Portu
President
Freudenberg-NOK Sealing Technologies