



The Greenbrier Companies

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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: Notice of Request for Public Comments on the Secretary of Commerce's
Initiation of an Investigation to Determine the National Security Effects of Steel
Imports

[FR Doc. 2017-08499]

Mr. Botwin:

On behalf of The Greenbrier Companies, I am responding to your request for comment on the Secretary's investigation. Greenbrier, headquartered in Lake Oswego, Oregon, is a leading international supplier of equipment and services to freight rail transportation markets. We design and build freight railcars in North America, South America and Europe. We serve freight railcar markets on these continents and others. We depend on having access to a stable supply of railcar axles and wheels made of steel, including those received from Sumitomo Corporation of Americas ("Sumitomo") imported from Japan.

Greenbrier recognizes the importance of protecting U.S. national and economic security at risk from steel imports, and particularly imports of Chinese steel in the form of freight rail manufacturing components. In carrying out its investigation, we hope the Department will distinguish between state-owned entities that enjoy limitless financing from their home governments and publicly traded, investor-owned companies such as Sumitomo that compete fairly and have invested significantly in the U.S. economy over the past several decades.

Sumitomo has proven itself to be a trusted supplier to the U.S. rail industry and has made numerous investments in the United States during this time. Recently, Sumitomo joined with Greenbrier to announce the April opening of GBSummit, the West Coast's only railcar axle machining facility. Jointly owned by Greenbrier and Sumitomo, the 80,000-square foot facility in San Bernardino, California employs 40 U.S.-based workers and uses advanced automation to perform railcar axle machining for our customers near two of America's busiest container ports, the Port of Long Beach and the Port of Los Angeles. Investments such as this demonstrate that Sumitomo poses no threat to the economic and national security interests of the United States and, in fact, furthers these interests. However, a reliable supply of railcar axles and wheels is critical to Greenbrier's North America operations at GBSummit and at our American railcar assembly, parts and repair network which includes nearly 3,500 U.S. workers.

Thank you for the opportunity to provide comment on the Secretary's investigation.

Sincerely,

A handwritten signature in blue ink that reads "William A. Furman". The signature is written in a cursive, flowing style.

William A. Furman

Chairman & Chief Executive Officer