

Dear. Mr. Botwin

Please accept this letter as the collective written comments of the undersigned in response to the Department of Commerce's ("Department") April 21, 2017 Request for Public Comments and Public Hearing on Section 232 National Security Investigation of Imports of Steel and certain comments made at the public hearing dated May 24, 2017.

I am the Director of Manufacturing, IBEW, International Office, and I concur with the statement below.

IBEW Local 2150 represents a 430 member workforce at SPX Transformer Solutions, Inc. located in Waukesha, Wisconsin. We are very concerned that limiting the available steel supply needed for United States transformer manufacturing would likely eliminate our ability to build transformers and result in a total plant shutdown of our plant in Waukesha as well as other US transformers manufacturing plants. The result would be a net loss of US Manufacturing jobs by providing foreign transformer manufacturers with the opportunity to decimate the market share of domestic transformer manufacturers. SPX cannot afford untimely delivery of steel products if we are to remain competitive in a market that already has steep foreign competition.

To the extent the Department imposes remedies for imported grain oriented electrical steel (GOES), cut core or finished electrical grade steel, it is important to ensure the decision does not put domestic transformer manufacturers at a competitive disadvantage. Thus, any such remedies must be uniformly imposed on all electrical grade imported steel, including the cut core and GOES steel, incorporated into fully or partially assembled transformers imported into the United States.

Protecting national security means more than just protecting U.S. steel manufacturing. Protecting national security also means protecting the U.S. manufacturing industries that employ thousands of U.S. workers who build products from steel. If the Department acts only to protect U.S. steel manufacturers, then it provides an unfair advantage to foreign manufacturers who can purchase foreign steel to make products and then export those products to the U.S. and undercut U.S. manufacturing. National security needs both robust steel manufacturing and robust manufacturing industries that use steel.

The employees of U.S. transformer manufacturers stand ready to support the Department in making a wise, considered determination in this proceeding.

Sincerely,

Randall A Middleton

Director of Manufacturing, IBEW