



PO Box 735
2214 West 14th Street
Sulphur, Ok 73086
(580)622-4207

E-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

Re: Comments on Section 232 Investigation of Steel Imports
request for exclusion of certain steel products.

Dear Director Botwin:

Kerr Pumps is a privately held company located in Sulphur, Oklahoma. Kerr Pumps employs 113 and we are continuing to hire more people for increased growth this year. We have also invested over 10 million dollars in new equipment to help supply our growing demand.

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 would like to make the following public comments.

Our company sources rough machined forgings for pump fluid ends made out of a proprietary grade of stainless steel from foreign sources. The reason to source these products from foreign sources is the quality of the stainless steel adds more value to our customers by extended performance life in the field. The material requirements we have asked for in a stainless steel are very stringent. We have had several forging companies in the U.S. turn us down because of these stringent requirements.

Our current foreign supplier is Bohler, a voestalpine mill based in Austria/Europe. Sourcing from Bohler allows us to maintain our competitiveness against imports of finished products from China and India thus securing well paid jobs in the United States. China is supplying complete products at such

KERR P U M P S

PO Box 735
2214 West 14th Street
Sulphur, Ok 73086
(580)622-4207

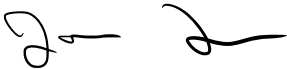
a low cost that it made us look at the value proposition of the products we manufacture. We decided to be competitive and survive we would need to engineer more innovative products that didn't compete on low alloy pricing; however offered value because of extended product life cycles.

Should we not be able to source these products from Bohler, we would have to have massive layoffs and look at moving our company offshore to compete with other manufacturers of pumping equipment in China and India. This product line is critical to the future of our company.

We are very concerned about this investigation and the implications it could have with our growing company. Having engineered advanced products with the forgings mentioned above has allowed our company to compete in the global market place. It is vital for the technical development of my company to have access to the most advance steel products that fit our purpose. I would prefer to source such products from an US Steel producer, but no US steel producer has offered the quality and service that I require. The niche applications that Bohler has offered allow me to concentrate on my customers and to continue to develop new products for the future.

Please don't hesitate to contact me, if you need further information

Sincerely,



Jake Foster
Operation Manager