



**KEY KNIFE, INC.**

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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,

Key Knife, an employee owned company (ESOP), manufactures wood chipping, flaking, and planing systems for the international sawmill, pulp and paper, and particleboard industries. We employ 89 hard working men and women, with a majority of the workers located at our manufacturing facility in Tualatin, Oregon.

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.

**Key Knife sources A8 tool "chipper" steel hot and cold rolled profiles, of a proprietary shape, and bar stock from Bohler, a voestalpine mill based in Austria.** The primary reason we source our steel profiles and bar stock from Bohler is due to their superior product quality and technical expertise. Both attributes provide us significant value in the critical areas of manufacturing, product performance, and product development. This enables us in turn, to provide significant value to our customer base. It should be noted that over half of our revenue comes from exports of our product to foreign economies.

Director Botwin, I'm very concerned about potential unintended consequences resulting from this investigation. I hope that all steel imports will not be painted with a negative broad brush. We would prefer to source such products from a US Steel producer, but no US steel producer offers the products and services that we require. Our small and niche industry will most likely never enjoy capital investment by our domestic steel industry necessary to develop the process to produce our raw material. We have partnered with our Austrian supplier allowing us to effectively compete in a global marketplace. Disruption of our economic model unnecessarily, would be a travesty and counter to the stated objective of this investigation. I caution you to not throw the baby

out with the bath water and instead focus on those countries that are in fact harming our domestic industry.

I pray that your investigation focuses on fixing what is broken in our international steel trade relations. I also pray you avoid harming those areas of trade that are working as intended, with comparative advantage being a main driver of why and how we trade. Please focus on the harm caused by China, South Korea, Russia, Vietnam, and India as the distinguished Congresswoman from Ohio implored of you.

**We request that tool steel imports from Austria are excluded from any potential remedies that are generated as a result of your investigation.** Focus the penalty on the wrongdoers, not those doing things right.

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

Sincerely,



Christopher W. McDonald  
CEO/President  
Key Knife, Inc.  
A U.S. Employee-Owned Company