



Komatsu Mining Corp. Group
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Randy White
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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

Via Email (Steel232@bis.doc.gov)

Re: Section 232 Investigation of Impact of Steel Imports on National Security

Dear Mr. Botwin:

We are writing on behalf of Komatsu Mining Corp. Group companies in the United States ("Komatsu Mining Group")¹ to express our views with regard to the investigation by the U.S. Department of Commerce into whether steel imports threaten to impair the national security.

The Komatsu Mining Group designs, manufactures, sells and services surface, underground and hard rock mining equipment from over 120 worldwide locations through its globally recognized P&H® and JOY® brands. As a major purchaser of steel for our U.S. manufacturing operations, we believe that the existing unfairness standard for imposition of anti-dumping and countervailing duty monetary penalties provides domestic steel producers with appropriate protection from unfair pricing competition by foreign steel producers that could impair the viability of the domestic steel industry. We are very concerned that replacement of the unfairness standard would allow for unrestricted domestic steel price increases that would negatively impact our companies' international competitiveness and lead to U.S. job losses in our companies and the companies with which we do business.

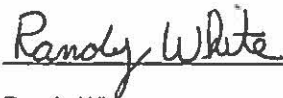
¹ Joy Global Surface Mining Inc, Joy Global Underground Mining LLC, Joy Global Longview Operations LLC, and Joy Global Conveyors Inc.

We are also concerned about the application of potential Section 232 protectionist measures to a broad range of steel products and fabrications and the increased risk of delays in the ability of domestic steel producers to meet our steel requirements.

Finally, we do not believe that any of these potential adverse impacts and risks would be outweighed by improvements to national security as a result of any Section 232 protectionist measures put in place to replace or supplement existing measures.

Thank you for your attention to our concerns and positions. Please feel free to contact me if you have any questions or require additional information.

Very truly yours,

A handwritten signature in cursive script that reads "Randy White". The signature is written in black ink and is positioned above a solid horizontal line.

Randy White
Vice President Operations & Supply Chain
Komatsu Mining Corp. Group