



May 31, 2017

SENT VIA ELECTRONIC 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

**SUBJECT: Comments on Section 232 Investigation of Steel Imports
Magna International, Inc.**

Magna International is the largest automotive supplier in the U.S. and North America with 321 manufacturing operations and 102 product development, engineering and sales centers and over 159,000 employees.

In the United States alone, we have 55 manufacturing operations and 13 product development, engineering and sales centers in 11 states and 24,650 people. Since 2011, Magna has created more than 5,925 new U.S. jobs.

Our company is a member of the Motor & Equipment Manufacturers Association (MEMA) and we endorse the comments being filed by MEMA 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 are providing these additional public comments to request that if restrictions are placed on the importation of steel, the following products be excluded from the restrictions on steel.

Product for exclusion	AISI Code	HTSUS	Current Country Source
Flat rolled, hot stamped, high strength strip, oiled, carbon alloy	AS150	7225.99.0090	Germany

The current supply of this type of steel is very limited. Further restriction could lead to a monopolistic environment and impair Magna's competitiveness. Additionally, employment levels may be negatively affected as a result.

To discuss this issue further, please feel free to contact me at (248) 631-5555 or Scott.Paradise@magna.com.

Sincerely,

Scott Paradise
Vice President,
Marketing & Business Development, Americas
Magna International, Inc.

c.c. MEMA, Ann Wilson
Senior Vice President of Government Affairs