



May 31, 2017

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

Re: Comments on Section 232 Investigation of Steel Imports

Dear Director Botwin:

Markem-Imaje is a global manufacturer and distributor of specialized traceability, variable data and product identification equipment, for customers in the packaging industry. We currently have approximately 630 employees among different locations in the United States that includes a distribution warehouse in Atlanta, GA and a manufacturing site in Keene NH.

Our company is submitting comments 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 public comments to request that if restrictions are placed on the importation of steel, the following products be excluded from the restrictions on steel.

I. LIST OF PRODUCTS FOR EXCLUSION

Finished goods and accessories made from steel for our marking and coding equipment which includes industrial ink jet printers, laser, label printers and thermal transfer printers. These parts are currently being imported from China and United Kingdom.

II. IMPORT OF THESE PRODUCTS WOULD NOT THREATEN NATIONAL SECURITY

If we are not able to obtain the steel we need this will translate into reduction or stoppage in production causing delays in the assembly areas and in some cases complete shutdown of our product lines; not to mention the significant impact to the economy due to employee layoffs.

Markem-Imaje does not believe that the importation of printer parts made from steel threatens the national security of the United States. Trade barriers on printer parts are certain to have a detrimental effect on our workers, our industry, our customers and consumers. The following facts support our stance:

- **No defense applications:** We are not aware of any significant defense application for printer parts made from steel. In any event, the large U.S. steel industry is in a position to meet any national security defense requirements that may arise for these parts.
- **Allied supply:** A significant portion of the volume of imports is coming from countries that are considered U.S. allies (*i.e.* United Kingdom and China).
- **Higher Costs to Consumers:** Trade actions will increase the domestic price of printer parts. The increased cost will be passed through the supply chain to the consumer.
- **No Displacement:** Imports are not displacing certain domestic products in any meaningful way.
- **Risk to Jobs and Markets:** Steel accounts for a significant portion of the cost of most of our printer products. A significant increase in raw material cost may lead to an erosion of volume and profit for our company. That will almost certainly cause a loss of U.S. jobs in the coding and marking industry.

Markem-Imaje encourages the Department not to recommend trade barriers to be implemented on printer parts and accessories of steel because it will result in job loss in the coding and marking industry.

Please contact me at +1-678-631-2707 if you need any additional information.

Sincerely,



Jessica Hess
Regional Trade Compliance Manager
Markem-Imaje Corporation
Kennesaw, GA 30144