



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

Dear Mr. Botwin:

Pursuant to your request for public comment on the US Commerce Department's Section 232 national security investigation of steel imports, I am submitting these comments on behalf of Metal Flow Corporation.

We consume stainless steel products in our production of deep drawn stampings for the automotive industry. We source these products from various US and foreign companies. Our decision on sourcing stainless material is not based on the price of the steel, but rather on the quality and technical specifications of the material. We require precision low carbon and stainless steel that is free of inclusions, rolled to tight tolerances and superior in drawability. We have found that material from certain foreign sources, especially Aperam Stainless in France, Outokumpu and Rautaruuki in Finland and Tata Steel in the Netherlands are the best sources for meeting our high level of quality standards. We operate in a highly competitive market for the automotive industry which all components delivered must meet the requirement of zero defects. We employ 260 people in the United States. To stay competitive, we must maintain the kind of quality product that we are able to produce from metal procured through Aperam Stainless in France, Outokumpu and Rautaruuki in Finland and Tata Steel in the Netherlands.

Moreover, the limited amount of steel we source from these foreign mills can have no broader impact on U.S. steel producers or the national defense requirements of the United States. U.S. steel companies command the vast majority of the U.S. market for stainless steel, a situation that has vastly improved for them with the Commerce Department's final decision in the antidumping and countervailing duty cases against imports of stainless steel sheet and strip from China. Those prohibitive antidumping and countervailing duty margins that will be imposed once the International Trade Commission makes its final decision will remove producers at the lower end of the U.S. market for these products. Moreover, there is no shortage of production of U.S.-made stainless steel and sufficient demand so that those companies will not lose any edge that could possibly have an impact on national defense requirements.

This is a case in which an industry that has recently successfully brought trade cases on stainless sheet and strip from lower-priced producers does not need further protection from companies selling at the high end of the market and countries that are long-term U.S. allies. At the same time, companies like Aperam Stainless in France, Outokumpu and Rautaruuki in Finland and Tata Steel in the Netherlands should not be the victims of such unnecessary market interference. While I can't speak for all parts of the steel industry, there is no need for the Commerce Department to take any action concerning imports of stainless steel products, particularly stainless steel sheet and strip, as there is no crisis in this market and no reason to conclude that there is any link between imports and the national defense needs of the United States.

Sincerely,

A handwritten signature in black ink that reads "Kelly E. Springer".

Kelly E. Springer
Chief Operating Officer
Metal Flow Corporation
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