



May 31, 2017

Brad Botwin, Director Industrial Studies
Office of Technology Evaluation
Bureau of Industry and Security
U.S. Department of Commerce
Room 1093
14th and Constitution Avenue, NW
Washington, DC 20230

Re: **Section 232 National Security Investigation of Global Steel Imports**

Dear Mr. Botwin:

Metals 2 Go is a user of round, rectangular and square carbon steel tubing that is used in structural applications "Structural steel tubing." Structural steel tubing is produced to mechanical tubing specifications for a variety of end uses. Our company uses these products in trailer frames and building fabrication. Our company has 110 employees located in Hewitt, Texas.

We buy domestic and foreign carbon steel tubing but we rely in part on imported carbon steel tubing from Mexico because of the proximity of supplies.

Metals 2 Go does not believe that the importation of carbon steel tubing from Mexico threatens the national security of the United States. Trade barriers on carbon steel tubing from Mexico 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 carbon steel tubing. In any event, the large U.S. steel industry is in a position to meet any national security defense requirements that may arise for carbon steel tubing.
- **Trading Partners:** A significant portion of the volume of imports is coming from Mexico and it is considered a U.S. ally (*i.e.* Mexico). Chinese structural tubing is blocked by AD/CVD duties.
- **Higher Costs to Consumers:** Trade actions will increase the domestic price of structural steel tubing. The increased cost will be passed through the supply chain to the consumer.

- **No Displacement:** We do not think Mexican imports are displacing certain domestic products in any meaningful way. U.S. producers are the dominant suppliers of structural steel tubing.
- **Risk to Jobs and Markets:** Steel accounts for over half the cost of most of our 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 metal industry.

Metals 2 Go encourages the Department not to recommend trade barriers to be implemented on structural steel tubing from Mexico.

Very truly yours,



Michael J Lathern
President
Metals 2 Go