



May 30, 2017

Mr. Brad Botwin
Director of Industrial Studies
Office of Technology Evaluation
Bureau of Industry and Security
U.S. Department of Commerce
1401 Constitution Avenue N.W.
Room 1093
Washington, D.C. 20230

Re: Section 232 Investigation of Steel Imports/Request for Exclusions

Dear Director Botwin,

Our Company is a registered Pennsylvania corporation, doing business as "Precision Marshall Steel Company". We are privately held and have been serving the North American tool steel market since 1948. We operate in four (4) locations, our manufacturing headquarters in Washington, Pa, our National Distribution Center in Bolingbrook, IL, and a regional warehouse in both Connecticut and California. We employ approximately eighty (80) persons.

We have relied on Bohler Bleche, a Voestalpine mill located in Murzzuschlag Austria for high quality tool steel sheet and thin plate since 1992. We formulated this relationship at that time because of the consistent reduction of domestic mill sources for this specialized type of product. At the present time, there are "NO" sources in the United States for the products that we purchase from Bohler Bleche!

The end use of our product is primarily the manufacture of tools and dies going into the domestic automobile, appliance, aerospace, and defense industries. The quantity of our product in the end uses application is mostly small but essential in the manufacturing of these commodities. Without these niche products, it is likely that the downstream impact on the American economy and jobs would be detrimental and significant. Certainly it would prove detrimental to the employment levels and economic success of our Company.

We encourage you to take these facts into account and not seek to impose any harmful import barriers on Bohler Bleche. Over the last five (5) years we have invested over \$6.0 Million in plant and equipment to serve our customers and do not want to see this investment fail to make a return due to an inadequate supply of raw materials.

Very truly yours,

Jackson Milhollan
President and Chief Executive Officer

cc: Supporting Attachments

Materials Supplied by Bohler Bleche:

AISI Tool Steel Designations:

- O-1
- A-2
- D-2
- S-7
- H-13
- 4142

Condition/Product Characteristics:

- Hot Rolled Annealed Sheet and Thin Plate- between 1/32" thick and 3/8" thick.
- Stress Relieved
- Cross Rolled
- Exact Widths and Lengths
- Sufficiently Flat to Surface Grind as Full Sheet/Plate

Domestic Mills that no longer serve the USA market for tool steel sheet/light plate.

- Simonds Saw and Steel, Lockport, N.Y.
- Jessop Steel Company, Washington, Pa.
- Crucible Steel Company, Midland, Pa.
- Crucible Steel Company, Pittsburgh, Pa. (Park Works)
- Allegheny Ludlum Steel Company, Leechburg, Pa.
- Ingersoll Johnson Steel Company, New Castle, In.
- Teledyne Vasco Steel Company, Monaca, Pa.
- Arcelor Mittal USA, (formerly Lukens Steel), Conshohocken, Pa.

Note: All of these companies have been supply sources to Precision Marshall in the past, but abandoned the domestic market for one reason or another.