



May 31, 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 NW
Room 1093
Washington, D.C. 20230

Re: Section 232 Investigation of Steel Imports/Re: Industeel France/Belgium div. Arcelor Mittal

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 four (4) locations, our manufacturing headquarters in Washington, Pa. our National Distribution Center in Bolingbrook, IL. and regional warehouses in California and Connecticut. We employ approximately eighty (80) persons.

Our oldest steel supply relationship is with the French and Belgian Industeel divisions of Arcelor Mittal dating back to 1982. They supply us with plates thicker than 3/8" and wider than 66". Some of the products they supply "are" available from domestic sources and we have longstanding relationships with both Arcelor Mittal in Coatesville, Pa. and Universal Stainless and Alloy Products in Bridgeville, Pa. to supply substantial portions of these total requirements.

Notwithstanding, there are specific categories of product and unique levels of quality that are "not" available to us from "any" American steel mill, but "are" available from Industeel France and Belgium. These include two (2) categories of trade marked mold steels (Super 7 S-7 and Marshalloy MQ/FM) as well as "cross rolled extra wide plates" in standard AISI grades D-2 and H-13. None of these materials are available from the aforementioned domestic sources or any other domestic sources. It is important to note that Super 7 S-7 and Marshalloy MQ/FM were recognized in the 201 Trade Action in 2002 and were granted exclusions.

Furthermore, the amount of steel that we source from these foreign mills is unlikely to have a broad impact on the domestic industry in any event. The outcome of the recent Cut to Length Plate trade action substantially reduced low cost/low quality material from entering our country at predatory prices for "commodity" materials. The materials I am bringing to your attention do not fall into this category and, we believe, should not suffer any further penalties or restrictions.

Finally, I would like to note that our Company has invested over \$6.0 Million dollars in the last five (5) years to maintain and enhance the employment of our workers and to insure our ongoing viability and success. We trust you will take all of this into account as the Department reaches its decision.

Very truly yours,

Jackson Milhollan
President and Chief Executive Officer