



COMMENTS BY: SAMUEL, SON & CO., LIMITED

TO: THE OFFICE OF TECHNOLOGY EVALUATION, BUREAU OF INDUSTRY AND SECURITY, U.S.

DEPARTMENT OF COMMERCE

IN RESPONSE TO: NOTICE REQUEST FOR PUBLIC COMMENTS ON SECTION 232 NATIONAL SECURITY

INVESTIGATION OF IMPORTS OF STEEL - DOCUMENT#: 2017-08499

Submitted: May 30, 2017

VIA EMAIL [Steel232@bis.doc.gov] & COURIER

Brad Botwin
Director
Industrial Studies, Office of Technology Evaluation
U.S. Department of Commerce
1401 Constitution Ave NW
Room 1093
Washington, DC 20230

Dear Mr. Botwin:

RE: REQUEST FOR COMMENT: "SECTION 232 INVESTIGATION ON THE EFFECT OF IMPORTS OF STEEL ON U.S. NATIONAL SECURITY" (DOCUMENT #: 2017-08499)

Samuel, Son & Co., Limited (Samuel) welcomes the opportunity to file this submission in response to the U.S. Department of Commerce's request for public comments on "Section 232 Investigation on The Effect of Imports of Steel on U.S. National Security". We are filing this support of the submission filed by the Canadian Steel Producers Association and specifically their request that Canada receive a full national exemption, excluding all Canadian steel products, including products fabricated from steel, from any new tariffs, quotas, tariff rate quotas or any other measures implemented as a result of this Section 232 National Security Investigation of Imports of Steel.

Samuel is one of the largest steel service centers in the United States and Canada with distribution and processing facilities across North America. Samuel also operates manufacturing divisions in both Canada and the United States, producing roll-formed steel products, steel strapping, pressure vessels, tubular and other steel products. Samuel purchases steel from American, Canadian and foreign producers for processing and ultimately downstream shipment to its manufacturing and industrial customers in North America. Samuel operates over 100 locations spanning the United States, Canada and Mexico. Samuel employs more than 4,900 employees with more than 2,200 employees in the United States.

Samuel additionally provides processing services for its North American downstream manufacturing and fabrication customers. These processing activities include slitting and cutting-to-length, precision rolling

and annealing, finishing and pickling. We also supply and offer credit terms to customers who wish to purchase smaller volumes of steel than are available directly from mills.

As further set out in the submission of the Canadian Steel Producers Association, we believe that Canada and the United States have an inherently shared and intrinsically linked interest in maintaining the health of the North American steel sector and our shared national security, and we appreciate the need to work closely together to achieve our common goals.

Similarly, we believe that the unintended negative consequences associated with the inclusion of Canada in any finding or action associated with the 232 investigation would cause harm on both sides of the border through the restriction or unbundling of our common steel and manufacturing supply chains.

Accordingly, we request that Canada receive a full national exemption from any measures implemented as a result of this Section 232 National Security Investigation of Imports of Steel.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Bill Chisholm".

William T. Chisholm
President and CEO