

May 31, 2017

**E-MAIL TO: [Steel232@bis.doc.gov](mailto:Steel232@bis.doc.gov)**

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

Re: Comments on Section 232 Investigation of Steel Imports  
request for exclusion of certain steel products

Dear Director Botwin:

Simonds International LLC is a U.S. owned company in business for over 100 years manufacturing cutting tools for the lumber industry. Simonds employs 218 people in 4 US locations, Michigan, Oregon, Alabama and Massachusetts. And as part of a recent merger with BGR Saws in Quebec Canada Simonds is expanding its presence in the eastern market of North America.

In response to the Department of Commerce, Bureau of Industry and Security's request for public comments on Section 232 National Security Investigation of Imports of Steel, we would like to make the following public comments.

Our company, Simonds International LLC, sources certain steel products: hot rolled fully annealed A8 modified chipper steel, commonly known as Chipper Knife Steel, from a foreign source. Chipper Knife Steel is also known by the propriety name Bohler K329 hot rolled annealed. Chipper Knife Steel is manufactured to precise tolerances in bar shape, and is not cut from plate. The reason to source these products from foreign sources is primarily the lack of any known source in the US. The three petitioners for the current anti-dumping litigation were invited to quote Chipper Knife Steel and all three declined, citing they did not have the capability to produce it. Additional reasons to source from foreign sources include, the process capabilities of the foreign supplier(s) reduce further manufacturing costs helping Simonds to stay competitive in a global market; the quality of the product increases the performance of our products.

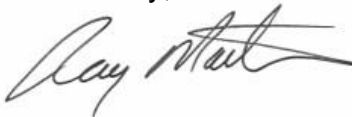
Our current foreign supplier is Bohler, a voestalpine mill based in Austria/Europe. Sourcing from Bohler allows us to maintain our competitiveness against imports of finished products from China, Japan, and Germany thus securing well payed jobs in the United States.

Should we not be able to source these products from Bohler, we would have to move production outside of the U.S. and reduce our U.S. workforce. The impact to Simonds International and our employees would be immediate and catastrophic.

Dear Mr. Botwin, I'm very concerned about this investigation. Having access to those products mentioned above allows my company to compete on the global market place. It is vital for the technical development of my company to have access to the most advanced steel products that fit my purpose. I would prefer to source such products from an US Steel producer, but no US steel producer has offered the quality and the service that I require. For the niche applications that I need, Bohler has offered me the product, the reliability of the quality and the service that allows me to concentrate on my customers and the performance of my products.

Please don't hesitate to contact me, if you need further information.

Sincerely,

A handwritten signature in black ink, appearing to read "Ray Martino". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ray Martino  
CEO  
Simonds International LLC