

3001 Deming Way
Middleton, WI 53562-1431
P.O. Box 620992
Middleton, WI 53562-0992
(608) 275-3340



May 31, 2017

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

RE: Section 232 Steel Investigation,

Dear Mr. Botwin,

We respectfully request that battery grade nickel plated steels and hot rolled coil (HTS Codes 7208.27, 7210.90, and 7212.50) be exempt from any Section 232 actions. These items are used to manufacture alkaline battery casings which are necessary to the domestic manufacturing of Rayovac alkaline batteries. There are no domestic steel suppliers capable of producing the base steel required to meet quality and performance needs of these casings and only one qualified domestic plating mill. Any further action against these products would have an adverse impact on the domestic manufacturability of alkaline batteries and the American jobs this industry supports.

Rayovac, a division of Spectrum Brands, Inc., directly employs 275 people at our alkaline battery production plant in Fennimore, Wisconsin and 175 people at our packaging and distribution facility in Dixon, Illinois in addition to supporting over 4,071 domestic employees within Spectrum Brands, Inc.

Sincerely,

Mark Codde

Mark Codde
VP, Global Batteries Operations
Spectrum Brands
3001 Deming Way
Middleton WI 53562

608-275-4971
Mark.Codde@SpectrumBrands.com