



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:

Our company, StarSU/Star Cutter Company, manufactures Gear Tools for the Automotive, Commercial Agriculture and Aerospace industries. Our Tawas Tool facility is located in East Tawas, MI and currently employs approximately 100 individuals. We have recently invested significant capital as part of technology advancements needed to maintain our competitive edge and to efficiently process the steel billets used to manufacture our product.

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 sources certain steel bar products from foreign sources in several critical high speed steel powder grade materials. The reason to source these products from foreign sources are based on the quality of the product that reduces further manufacturing costs; quality of the product that increases the performance of our products; propriety steel developed from the foreign source; lack of capacity in the US (unreliable supply from domestic mills).

Our current foreign suppliers are Bohler, based in Austria/Europe and Erasteel, based in France/Sweden. Sourcing from these European based companies allows us to maintain our competitiveness against imports of finished products thus securing well payed jobs in the United States, specifically to northeast Michigan and our company that is currently celebrating its 90th year anniversary.

Should we not be able to source these products from Bohler and Erasteel, we would have to look into moving a significant amount of capacity offshore resulting in a reduction workforce.

Dear Mr. Botwin, I'm very concerned about this investigation. Having access to those products mentioned above allow 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 advance steel products that fit my purpose. We would prefer to source such products from a US Steel producer, but currently no US steel producer offers the quality and the service that we require. For the niche applications that need Bohler and Erasteel has offered our company the product, the reliability of the quality and the service that allows our operations to concentrate on our customers and the performance of our products.

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

Sincerely



Jeffery L. Lawton

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