

May 31, 2017

**VIA ELECTRONIC MAIL—**

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Mr. Brad Botwin  
Director, 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 National Security Investigation of Imports of Steel**

Our companies produce building materials, such as prefabricated building sections, roofs, etc. from galvalume and galvanized steel coils.

Our companies are very concerned about the threat to our company's future if the imports of flat rolled galvalume steel we rely on are restricted by additional tariffs or quotas. Only a few American mills produce galvalume at all; those mills are not interested in selling this at a competitive price to most users. There also are not enough mills producing this product to satisfy demand. Only certain selected customers are able get pricing at competitive levels. Without access to imported galvalume, our ability to compete will be reduced or eliminated.

American national security is not threatened by imports of galvalume . Not only are coated products not used in defense applications; most American mills are profitable, to the extent that they are expanding their coated steel operations, not reducing them. For example, on March 30, Steel Dynamics dedicated a new painting line in Columbus, MS. A second line for galvalume was opened in late 2016, well before the national security investigation was announced.

On May 25, Nucor announced that it would build a new \$200 million galvanizing line in Kentucky. Imported coated and painted steel is not a threat to our security, because these steels are not used for military purposes.

We urge you to not restrict the steel imports that are vital to our survival.

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