

**E-MAIL TO: 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:

We represent cutting tool manufacturers in the states of New Hampshire and Wisconsin. Collectively we employ hundreds of people and millions of dollars of investments. Our tools provide a cost effective solution to all major metal working industries including automotive, aerospace, agricultural, energy and consumer products. One of our specialties is the manufacturing of precision taps, whose raw material is High Speed Steel.

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 companies source high speed steel (HSS) products from European sources. The reason to source these products from foreign sources are:

1. There is only one domestic source and competition is critical.
2. The European sources produce a 3<sup>rd</sup> generation product, while the domestic source only produces a 2<sup>nd</sup> generation product.
3. The European sources inventory HSS grades that the domestic source does not.

Our current foreign suppliers are Bohler and Erasteel, with mills based in Europe. Both mills have domestic finishing locations where they employ American workers finishing semi-finished imported products.

We have significant competitors in Japan and Germany. For us to stay competitive, it is critical that we have access to HSS from Bohler and Erasteel at competitive prices. Should we not be able to source these products from these suppliers, we would lose margins, reduce investment and reduce headcount.

Dear Mr.Botwin, We are very concerned about this investigation. Having access to HSS products allow our companies to compete domestically and in the global market place. It is vital for the technical development of our companies to have access to the most

advance steel products that fit our needs. Not only do we need to most advanced products, we need to purchase our raw materials at competitive prices. Having at least 3 viable suppliers it critical to our continued success.

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

Sincerely

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