Honorable Wilbur L. Ross  
Secretary of Commerce

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

Linz, 2017-05-30

Re: Comments on Section 232 Investigation of Steel Imports - Austria

Dear Secretary Ross and Director Botwin,

We, voestalpine AG (voestalpine), an Austrian-based multinational group, as well as our affiliates in the United States and abroad, are submitting these comments with respect to the Section 232 investigation on the effects of steel imports on U.S. national security currently pending at the Department of Commerce. We appreciate the opportunity to present our views as an exporter of highly engineered semi-finished and finished steel products to the United States, an importer U.S. made steel materials, and a significant investor and employer in the United States.

voestalpine urges the Department to exercise restraint and give careful consideration to the sources and types of steel imports entering the U.S., and the level of investment and integration by foreign producers like voestalpine, before instituting broad-based restrictive measures. In particular, we respectfully request that Austrian origin steel, and specifically the types of products listed below, be considered for exclusion from any restrictive measures. Austria has been a small, stable, and respectful participant in the U.S. steel market for decades without incident. Our steel products compete on the basis of high quality and high value. We do not threaten basic U.S. steel manufacturing capacity. We have invested heavily in U.S. manufacturing operations and have added value to critical industries.

voestalpine  
EINEN SCHRITT VORAUS.
Background on voestalpine and its Steel Operations

voestalpine (www.voestalpine.com) is a globally leading technology and capital goods group with a unique combination of material and processing expertise with 50,000 employees worldwide. We serve the transportation and energy sectors, and have 49 manufacturing and service locations in the United States employing 2,200 people. With our top-quality products and system solutions based on steel and other metals, we are one of the leading partners to the automotive, railways, aerospace, and consumer goods, as well as to the oil and gas industries. Worldwide, Americans enjoy the Group’s high-quality approach and sustainable business development as 14% of the voestalpine Group’s stock is currently owned by North American investors.

voestalpine uses both U.S. domestic and imported sources of raw materials to deliver a variety of products to its customers.

Over the last 5 years, voestalpine has embarked on a North America strategy to invest heavily in the United States for a variety of manufacturing activities. The most prominent recent example is our flagship investment in Corpus Christi, Texas. In October 2016, the voestalpine Group commissioned a $1 billion USD plant to convert iron ore into HBI (hot briquetted iron) for domestic steel production and for export to its plants in Europe. This HBI is then used to manufacture other steel products which are then exported to various countries, including the United States. Those imported steel products are, in turn, further manufactured in the United States into a variety of steel, automotive and other products. Many of these products are critical to U.S. energy policies. The voestalpine Group is a growing U.S. manufacturer, is employing U.S. citizens, contributes to the U.S. economy, and is supporting U.S. national security and energy objectives.

voestalpine is also active in the railways infrastructure supply segment. For more than 25 years we have operated as voestalpine Nortrak, with 7 manufacturing plants spread out over the USA. These plants produce railway switches and turnouts. We are considered the market leader and backbone for all Class I railways and Transit agencies.

We have provided further details on our products and U.S operations below, and in the materials provided in the attachments.

voestalpine Tubulars (Energy)

The voestalpine Tubulars business unit has been a participant in the U.S. market since 1981. For the past 20 years we have partnered with Grant Prideco, a subsidiary of National Oilwell Varco, to support the U.S. oil and gas drilling industry. voestalpine Tubulars is a producer of premium seamless OCTG (Oil Country Tubular Goods) casing & tubing and line pipe of high steel grades and with proprietary connections (threads). These products are essential for shale drilling in the U.S., in particular horizontal or directional wells. In addition, voestalpine Tubulars supports Grant Prideco operations directly, by supplying intermediate green tubes for their mill in Navasota Texas which uses the intermediate products to manufacture highly
engineered drill pipe. We understand NOV/Grant Prideco is submitting their own comments to the Department on this unique partnership which promotes U.S. energy independence and supports jobs in Texas. The specific green tubes voestalpine supplies cannot be duplicated. Disruption of those supplies would result in the curtailment of Grant Prideco drill pipe manufacturing operations.

Over the last seven years, its OCTG imports to the U.S. have averaged less than 2.8 percent of annual U.S. consumption, which in 2017 is projected to be 5M metric tons. In no way have these limited quantities damaged the U.S. industry, or posed a threat to national security. voestalpine Tubulars is a small high-value manufacturer and has maintained its current capacity level in Austria for the last 10 years. In its 30 year partnership with its U.S. distributors (B&L Pipeco, Premier Pipe, Sooner) and operator customers (PDC, EP Energy, XTO Energy, WPX Energy, Cabot Oil & Gas) - it has never sold its premium products at dumping prices. We do not make low priced commodity products (API) – those products are not able to meet the technical demands of the deviated portion of directional wells in shale fields. Instead voestalpine Tubulars has strategically decided to serve the high end of the market with seamless specialty products in very limited quantities in order to satisfy its customers with premium products.

We suggest and request that if restrictions are placed on the importation of steel, the following energy tubular products from Austria be excluded from these restrictions.

<table>
<thead>
<tr>
<th>Product for exclusion</th>
<th>HTSUS</th>
<th>Current Country Source</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>OCTG - Casing</td>
<td>7304.29</td>
<td>Austria / voestalpine Tubulars</td>
<td>U.S. domestic supply of OCTG can only meet approximately 50% of the demand. Imports of premium (not commodity) products needed for shale drilling &amp; energy independence</td>
</tr>
<tr>
<td>Green tubes</td>
<td>7304.23</td>
<td>Austria / voestalpine Tubulars</td>
<td>Intermediate energy pipe used to manufacture drill pipe in U.S.</td>
</tr>
<tr>
<td>OCTG - Tubing</td>
<td>7304.29</td>
<td>Austria / voestalpine Tubulars</td>
<td>U.S. domestic supply of OCTG can only meet approximately 50% of the demand. Imports of premium (not commodity) products needed for shale drilling &amp; energy independence</td>
</tr>
</tbody>
</table>
The energy industry consensus is that domestic production alone is insufficient to satisfy the demand for premium seamless OCTG. Imports from Austria are essential to support U.S. domestic production.

Premium OCTG supply in the United States could easily be disrupted because of a Section 232 action, it will raise the prices of premium OCTG significantly, which would cause oil producers to stop drilling. In addition, disrupting the supply of seamless casing and green tubes to Grant Prideco would lead to a shortage of drill pipe for U.S and foreign rigs, A decrease in drilling activity could happen within just a few months of the action announcement, and likely would be followed by a sharp reversal of oil supply and demand, causing a sudden increase in oil prices. American consumers would suffer, as any hint of increase in oil price would cause an immediate speculative increase in fuel prices at the pump.

In summary, we respectfully request that voestalpine Tubulars energy tubular imports into the United States be excluded from a Section 232 action for the benefit of U.S oil producers, and for citizens and consumers of the United States.

**voestalpine Special Steel/High Performance Metals**

The Special Steel Division of voestalpine has deep roots in the United States. The largest U.S. entity of the voestalpine Special Steel Division, Bohler-Uddeholm Corporation is headquartered in Elgin, Illinois, recently celebrating its 90th anniversary in the United States. The Special Steel Division of voestalpine is well known coast to coast as a leading provider of highly technical, creative, top quality, and in many cases unique special steels that provide sustainable solutions to complex manufacturing problems. Additional services offered by many voestalpine Special Steel locations throughout the United States, e.g. heat treatment or coating, meet the United States customers’ needs and make voestalpine Special Steel a reliable partner who – by having also invested in niche activities – complements local providers’ portfolio.

The primary focus is the automotive industry. voestalpine Special Steel provides tool, die and mold steels used in the manufacture of die cast engine components, injection molded door panels and headlights, hot stamped crash beams and structural components and heavy stamping dies used to make fenders and hoods. The unparalleled quality of tool steels sourced from Austria distributed by Bohler-Uddeholm Corporation and several other affiliates in the United States are known industry wide as tooling materials that last longer before reaching the end of its lifetime cycle – saving our U.S. customer’s money and making them
more competitive on a global stage. Many tools, dies and molds built in the United States utilize voestalpine tool steels, as specified by the U.S. automotive end-user. These end users depend on the consistent and top-quality materials supplied by voestalpine to ensure their tools, dies and molds will run without breakdown, scrap parts or premature failure. These specifications are not drawn up because voestalpine tool steel might be cheaper; it is due to the quality that is relied upon by the end users of our materials to meet their financial objectives, at a premium price.

The Special Steel Division of voestalpine is a valued and leading supply chain member of more industrial segments than automotive. The same reputation for quality, service and technical leadership exists in the consumer packaging, forging, power generation, oil and gas and commercial aerospace industrial segments. From its location in South Boston VA, voestalpine is a leading manufacturer of edge wire, a critical component in band saw blades used across the country. Our facility in South Boston, VA, has been producing high speed steel wire since 1972, relies exclusively on the supply of pre-material tool steel from Austria. Without this pre-material this location cannot continue operations. There are insufficient alternate domestic sources of high speed steel to meet the needs of cutting tool manufacturers in the United States. Trade action to limit the supply of Austrian high speed steel would therefore cause significant harm to the domestic cutting tool industry.

The Special Steel Division of voestalpine positively contributes to the U.S. economy in more ways than the quality products distributed. voestalpine Special Steel has heavily invested in the United States for over 90 years in first class distribution of and services on special steel. Currently 476 people working out of 19 locations across the U.S. enjoy full-time employment and depend on the supply of Austrian special steel to continue their employment. Again, we are investing in the U.S., not replacing U.S. jobs.

The Special Steel Division of voestalpine continuously invests in growth in the United States to support domestic industry. In the last 5 years more than USD 34 million dollars has been invested in the United States. Examples of such investments are automated storage systems in Elgin, IL; state of the art precision machining equipment in Southern California, 4 PVD coatings facilities across the United States, a highly engineered technical solution to improve the performance of tools being used to make critical parts in the U.S. These investments are a testimonial to voestalpine’s commitment to growth and a secure future as a positive contributor to employment and the economy of the United States. To support this investment new locations have been opened in Houston, Dallas, Cleveland, Lansing and Walnut California in the last 5 years. Last year, employees contributed payroll taxes of $6.9 million. The companies of the Special Steel Division of voestalpine paid employer, real estate, corporate and federal taxes of greater than $ 5.5 million. Last year, imports from Austria were almost 10,000 metric tons. These are very small amounts of imports and support U.S steel manufacturing jobs.

Many important industrial segments that could be considered as of critical national importance rely on voestalpine Special Steel. Examples include the automotive industry, the power generation industry, the chemical processing industry, the commercial aerospace industry, oil
and gas exploration and the housing industry; in many cases the production technology used to produce the special steel products distributed in the United States cannot be duplicated with domestic producers of specialty steels. Close to 45% of the voestalpine Special Steel Division materials distributed in the United States use special manufacturing technologies not available in the United States. 25% are made with a pressurized ESR technology that is simply not available in the United States. Approximately 10% of the materials distributed in the United States are made with a third generation Powder Metallurgy Production Process that does not exist in the United States. Approximately 8% of the materials distributed in the United States are made with a vacuum re-melting technology that is not available in sufficient quantities in the United States.

We request that the Department consider excluding the following special steels imported from Austria if restrictive measures are undertaken:

<table>
<thead>
<tr>
<th>Product for exclusion</th>
<th>HTSUS</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>remelted tool steel</td>
<td>7224.10, 7224.90, 7225.30, 7225.40, 7226.91,</td>
<td>U.S. domestic supply only meet a small part of the market demand. Imports of these premium (not commodity) products needed for maintaining competitive manufacturing – otherwise the share of imported finished tools may increase further</td>
</tr>
<tr>
<td></td>
<td>7226.92, 7227.90, 7228.30, 7228.40, 7228.50,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7228.60, 7228.70</td>
<td></td>
</tr>
<tr>
<td>powder metallurgical tool</td>
<td>7224.10, 7224.90, 7225.30, 7225.40, 7226.91,</td>
<td>No U.S. domestic supply of third generation powder metallurgy products</td>
</tr>
<tr>
<td>steel &amp; high speed steel</td>
<td>7227.90, 7228.30, 7228.40, 7228.50, 7228.60,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7228.70</td>
<td></td>
</tr>
<tr>
<td>high alloyed tool steels</td>
<td>7224.10, 7224.90, 7225.30, 7225.40, 7226.91,</td>
<td>U.S. domestic supply only meet a small part of the market demand. Imports of these premium (not commodity) products needed for maintaining competitive manufacturing – otherwise the share of imported finished tools may increase further</td>
</tr>
<tr>
<td></td>
<td>7227.90, 7228.30, 7228.40, 7228.50, 7228.60,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7228.70</td>
<td></td>
</tr>
<tr>
<td>high speed steel</td>
<td>7226.20, 7227.10, 7228.10, 7228.10, 7228.10,</td>
<td>U.S. domestic supply only meet a small part of the market demand. Some product forms like wide sheet not available from US sources</td>
</tr>
<tr>
<td></td>
<td>7228.10, 7229.90, 7224.10, 7224.90, 7225.30,</td>
<td></td>
</tr>
<tr>
<td></td>
<td>7225.40, 7228.40, 7228.70</td>
<td></td>
</tr>
<tr>
<td>high nickel alloys</td>
<td>7222.11 00 06, 7222.19 00 06, 7222.20 00 06, 7222.30 00 06, 7222.30 00 06, 7224.10 00 05, 7224.90 00 05, 7225.30 30 05, 7225.50 80 10, 7227.00 60 06, 7228.30 80 05, 7228.80 80 05</td>
<td>voestalpine supplying products with improved material properties not available in the US</td>
</tr>
<tr>
<td>special stainless steel</td>
<td>7218.10, 7218.91, 7218.99, 7219.21, 7219.22, 7219.23, 7219.24, 7220.11, 7220.12, 7220.90, 7221.00, 7222.11</td>
<td>voestalpine supplying patented products, products with improved material properties and products with approvals from global OEMs not available in the US</td>
</tr>
<tr>
<td>electroslag or vacuum arc remelted special stainless steels</td>
<td>7222.11 00 01, 7222.19 00 01, 7222.20 00 01, 7222.30 00 01,</td>
<td>voestalpine supplying patented products, products with improved material properties and products with approvals from global OEM's not available in the US</td>
</tr>
<tr>
<td>chipper knife steel</td>
<td>7226.91.05.00, 7228.30.40.00</td>
<td>voestalpine supplying products with improved material properties not available in the US</td>
</tr>
<tr>
<td>special profiles</td>
<td>7228703041, 7229703081</td>
<td>voestalpine supplying high alloyed tool steel customer drawing specified non U, I; H or T hot rolled profiles not available in the US</td>
</tr>
</tbody>
</table>

These products support U.S. jobs in key U.S. manufacturing sectors. They do not replace critical U.S. steel production. voestalpine is investing in U.S manufacturing facilities with the help of these products.

In summary - the Special Steel Division of voestalpine is exactly the type of company that has been keeping America great for more than 90 years – providing well-paying jobs to American families; investing in and growing the U.S. economy; providing highly appreciated technological solutions to the manufacturing industry that make American companies globally competitive and provide tens of millions of dollars of tax revenue to the government. As a relatively small importer of steel into the United States, any move to stop or impair imports of Austrian special steel would cause only harm to the U.S. economy and U.S families.

**voestalpine Flat Steel Products**

The voestalpine Steel Division serves the growing demand of innovative advanced high strength steels (AHSS) to the U.S. automotive industry.
Products like galvanized press hardened steels (phs-ultraform®, phs-directform®), dual phase and complex phase steels provide extreme strength and excellent crash behavior and are used in safety critical applications such as B-pillars and seat rails in automobiles.

Further to its safety critical aspects, the light weight of these voestalpine flat steel products increases fuel efficiency by considerably reducing body weight, helping to achieve ever growing U.S. fuel consumption benchmarks.

These products do not pose a competitive threat to U.S. steel producers due to their niche market position, representing less than 0.1% of the overall market volume and are processed in the U.S. by U.S. manufacturers like General Motors, Honda, BMW, Volkswagen and Mercedes to meet weight and critical safety requirements.

All of these products are exclusively designed for automotive light weight design and not for military applications. Hence, we respectfully request that the Department considers excluding the following products from Austria in any restrictive measures:

<table>
<thead>
<tr>
<th>Product for exclusion</th>
<th>HTSUS</th>
<th>Current Country Source</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHS (phs-ultraform®, phs-directform® … press hardening steel based on hot dipped galvanized and coated steel)</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for structural parts in the automotive industry</td>
</tr>
<tr>
<td>AHSS (advanced high strength steel)</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for structural parts in the automotive industry</td>
</tr>
<tr>
<td>Galvannealed and zinc-magnesium coated steel</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for exterior parts in the automotive industry</td>
</tr>
</tbody>
</table>
voestalpine Automotive Components Business Unit

The voestalpine Automotive Components Business unit was established in 2012 in Cartersville, Georgia. It is a direct supplier of highest strength body in white structural parts to the southeastern US Automotive industry. A total of $80 million USD has been invested in our U.S operations creating 180 U.S. jobs. Another $40 million will have been invested by 2020, creating in total 450 US jobs. Additionally, a second location has just been established in Birmingham Alabama, with additional $15 million investment and 50 jobs by 2020.

voestalpine Automotive Components Cartersville Inc. has since its founding strongly been involved in community engagement, building sustainable relationships with the local and state administrations. Of particular interest is the apprenticeship program, that allows high school students to parallel their education in the local College and Career Academy, while already being employed at our facility and receiving on-the-job training and learning. Thus, once graduated, these students have gained a DOL certified industrial apprenticeship. Amongst others, these activities have led to several recognitions within the state of Georgia, including the Lt. Governor’s Award 2016 for the Business Partner of the Year for the Georgia education system, the Manufacturer of the Year award by the Bartow Chamber or the Global Impact Award of the metro Atlanta Chamber of Commerce so far.

With this investment, voestalpine has introduced some of the latest, state of the art steel manufacturing technology for hot forming steel (a process designed to make steel parts stronger and therefor lighter, and hence contributing to reach gas mileage increases) locally here in the U.S. This mirrors our production capabilities from sister plants in Europe so the U.S is now a manufacturing hub. voestalpine is educating the local workforce to independently run and maintain these highly sophisticated processes for the benefit of the local automotive industry. The base steel material for these innovations is sourced locally and imported from Europe, as in most cases the required steel quality and grade specifications are not yet available from the US market as the technology to meet our strict specifications is simply not present. A disruption of this supply chain, would do harm not only to the company but to its Automotive customers.

In order to avoid unnecessary disruption of our US manufacturing operations, we respectfully request that if restrictions are placed on the importation of steel, the following products originating in Austria be excluded from these restrictions.

<table>
<thead>
<tr>
<th>Product for exclusion</th>
<th>HTSUS</th>
<th>Current Country Source</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>PHS (phs-ultraform®, phs-directform® … press hardening steel based on hot</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for structural parts in</td>
</tr>
<tr>
<td>dipped galvanized and coated steel</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for structural parts in the automotive industry</td>
</tr>
<tr>
<td>----------------------------------</td>
<td>------------</td>
<td>-----------------------------</td>
<td>---------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>AHSS (advanced high strength steel)</td>
<td>7225920000</td>
<td>Austria / voestalpine Stahl</td>
<td>Imports of premium niche products needed for exterior parts in the automotive industry</td>
</tr>
</tbody>
</table>

The applications using these steel grades are limited, also because of premium pricing to a small number of essential parts in a car body. The quantities used in voestalpine Automotive Components are less the 30,000 Tons per year at the projected peak levels and do not pose a threat to the local steel industry.

**voestalpine Rotec**

voestalpine Rotec was established as a green field site in 2000 to service an extremely niche portion of the automotive market, focusing on the value add transformation of drawn mechanical steel and aluminum tubing for use in various demanding vehicle applications. Components produced by our facility in Lafayette, Indiana will be found on all U.S. as well as foreign produced vehicles. These highly engineered and safety critical components can be seen in airbag, seatbelt, steering column, air suspension, pressure vessel, anti-vibration and structural vehicle assemblies.

Cold drawn mechanical tubing represents a very small portion of the steel industry in the US with total demand estimated at 650,000 to 750,000 tons. Imports globally account for less than 20% of this demand and are focused mainly on supporting global supply contracts for specific engineered, made to order sizes. In some cases, such as Austria, the material is simply not available on the US market, and in other cases imports are used as part of other global supply agreements where volumes are so insignificant that U.S. producers have limited interest. To highlight the “made-to-order” nature of our business we currently have over 200 unique material requirements covering less than 10,000tons, with many orders falling below 5 tons per year.

Since 2017 we have invested over $35m in our Lafayette facility growing from 12 employees to 150 and we now hold a top 3 market position as a supplier of precision tubular components for the safety restraint market. We have a strong commitment to manufacturing in the U.S.; to
demonstrate this all $10m of insurance funds received after our facility was devastated in 2013 by a tornado were reinvested in Lafayette. This is important as Lafayette currently exports 50% of their product to other NAFTA locations and resisted customer pressure to locate production to Mexico after this natural disaster.

In addition to investment, jobs, taxes, training and competing globally to such an extent that Lafayette actually improves trade imbalance, Lafayette is also an excellent corporate citizen. The local President is actively involved in many local boards, charities and organizations and has been a key voice to manufacturing and skills gap development. In 2015, then Governor Pence, now Vice President Pence appointed him to his Regional Workforce Development Council specifically focused on skills enhancement, training and development of Indiana workers to ensure long term competitiveness of the U.S. workforce. Other members of the Lafayette team and the corporation also assist with time and financial contributions to causes such as, Habitat for Humanity, United Way, Food Finders and many local organizations focused on diversity and sustainment of the community in which we operate.

Such a small and specialized sub segment of the U.S. Steel production poses no risk to National Security. Tariffs and quotas if imposed would most likely increase our customer pressure to move manufacturing to other countries or to increase the imports of the further value added components under non steel related HTSUS codes.

<table>
<thead>
<tr>
<th>Product for exclusion</th>
<th>HTSUS</th>
<th>Current Country Source</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tube, pipes and hollow profiles, seamless, of iron (other than cast iron) – Cold Drawn.</td>
<td>7304.31</td>
<td>Austria / voestalpine Rotec GmbH</td>
<td>Imports of premium niche products required for safety restraint components.</td>
</tr>
<tr>
<td>Other tubes, pipes and hollow profiles (for example open seamed or welded, riveted or similarly closed), of iron or steel – Other – cold drawn.</td>
<td>7306.30.5015</td>
<td>Austria / voestalpine Rotec GmbH</td>
<td>Imports of premium niche products required for safety related components.</td>
</tr>
</tbody>
</table>
Final Notes

We want the Department to know that voestalpine is respectful of our trading relationship with the United States and has invested heavily in the United States. Our modest imports of highly engineered steel products are not a threat to the U.S. steel industry but complement U.S. production, incorporate U.S. origin materials, and contribute significantly to employment in the United States. We request that the Department consider carefully Austria and voestalpine’s specific facts and contributions to the United Steel industry in its deliberations. In many ways voestalpine and its products contribute to U.S. national security and energy independence objectives. Any disruption to our supply chain could have serious consequences to other sectors of the U.S. economy and compromise our current and future investments in the U.S.

Our flagship U.S. investment is the $1 billion HBI plant in Corpus Christi Texas. This plant supplies critical needs for both local U.S. steel producing customers, and voestalpine mills in Austria and Europe, where it is used to manufacture both high grade finished and unfinished steel products. Many of these products are then re-exported to the United States for further manufacturing as noted above. voestalpine supports U.S. investment and jobs in both the upstream and downstream steel markets, and in the energy industry. The jobs we create are real and important in states like Texas, Illinois, Alabama, Wyoming, Colorado, Kentucky, Indiana, Georgia, Wisconsin, Ohio, Pennsylvania, California, Washington, Virginia, New York, Massachusetts, Minnesota, Iowa, Michigan, Connecticut and Kansas.

We urge you and the Department to consider carefully the contributions and investments that voestalpine and its products make to the U.S. economy. voestalpine products are not a problem, but a solution to national security needs.

If you have any questions relating to this matter, please feel free to contact our counsel, Mr. Matthew Nolan, Arent Fox Fox LLP, Attorneys at Law, 1717 K Street, NW, Washington, DC 20006-5344, 202.857.6013 direct, 202.857.6395 fax, matthew.nolan@arentfox.com. Mr. Nolan would also be honored to meet with you and/or your staff in Washington D.C.

Linz, 30th of May 2017
voestalpine AG

Respectfully submitted,

Mr. Wolfgang Eder
CEO

Mr. Franz Rotter
Member of the Management Board

Annex: voestalpine Group in the US – overview and main activities
voestalpine Group in the USA
Overview and main activities
voestalpine Group in the USA

Facts

| Locations: | 49 |
| Employees (BY 2015/16): | 2,235 FTE |
| Investments last 5 years: | > $1.2 billion |
voestalpine Group in the USA
49 locations/2,235 employees
## Main locations - Steel Division

**voestalpine Texas LLC**

### Production Site for HBI
- Corpus Christi / TX

### Main products
- Hot briquetted iron

### Top customers
- voestalpine / Austria
- AHMSA / Mexico
- NUCOR / USA
- Big River Steel / USA
- TYASA / Mexico

<table>
<thead>
<tr>
<th>Employees (2015/16):</th>
<th>236 FTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investments last 5 years:</td>
<td>$1 billion</td>
</tr>
</tbody>
</table>
Main locations – High Performance Metals/Special Steel Division
Bohler-Uddeholm / Edro / Eifeler Coatings

Added Value Services Provider for Tool Steel and Special Materials
β Headquater: Elgin / Illinois +18 other locations

Main products
β Tool, die and mold steels
β High speed steels
β Special stainless
β High nickel alloys
β Edge wire
β Heat treatment
β Machining
β Coatings

Employees (2015/16): 476 FTE
Investments last 5 years: $ 34 million

Top customers
β Broad customer base with a focus on tool & die makers and cutting tool manufacturers
β National Oilwell Varco, Weatherford

voestalpine AG
5 | 5/30/2017 | voestalpine in the USA
### Main locations - Metal Forming Division

**voestalpine Automotive Components Cartersville**

**Production Site for Automotive Components**

- **Cartersville / GA**

<table>
<thead>
<tr>
<th>Details</th>
<th>Values</th>
</tr>
</thead>
<tbody>
<tr>
<td>Employees (2015/16 – 2020/21)</td>
<td>80 – 450 FTE</td>
</tr>
<tr>
<td>Investments last 5 years</td>
<td>$80 million</td>
</tr>
<tr>
<td>Total investments until 2020/21</td>
<td>$120 million</td>
</tr>
</tbody>
</table>

**Main products**

- Hot formed and cold stamped components and assemblies used in the automotive industry

**Top customers**

- Daimler
- VW
- Magna

---

*voestalpine AG*

5/30/2017 voestalpine in the USA

---

*voestalpine AG*

ONE STEP AHEAD.
Main locations - Metal Forming Division
voestalpine Roll Forming Corporation (RFC)

Production Site for Rollformed Products
- Shelbyville / KY
- Jeffersonville / IN

Main products
- Rollformed parts for Aviation, Construction Industry and Machine Building

Top customers
- Arconic (Alcoa)
- Amazon Robotics
- Steelcase

Employees (2015/16): 324 FTE
Main locations - Metal Forming Division
voestalpine Rotec Inc

Production Site for Precision Tube Components
β Lafayette / IN

Main products
Automotive passive safety parts such as seat belt pre-tensioners, airbag components and suspension system parts

Top customers
β Autoliv
β TRW
β Vibracoustics

Employees (2015/16): 128 FTE
Main locations - Metal Forming Division
voestalpine Sharon

Production Site for Rollformed Products
Sharon / PA

Employees (2015/16): 42 FTE

Main products
Rollformed parts for Construction Industry, White Goods and Logistic Solutions

Top customers
Dematic
Intelligrated
ThyssenKrupp
Main locations - Metal Engineering Division
voestalpine Nortrak Inc.

Heavy Haul Turnouts & Services

- Cheyenne, WY
- Newton, KS
- Decatur, IL
- Pueblo, CO
- Birmingham, AL
- Chicago Heights, IL

Main products
- Railway switches, turnouts & track and rolling stock monitoring

Top Customers
- Union Pacific Railroad
- BNSF Railway
- Norfolk Southern
- Canadian National Railway

Employees (2015/16): 864 FTE
Investments last 5 years: 42 million $
Main locations - Metal Engineering Division
voestalpine Bohler Welding USA, Inc.

Production of medium and high-alloyed welding consumables
Sugar Land / TX

Main products
- Welding consumables: Welding wires, welding electrodes, fluxes

Top customers
- Airgas, Praxair
- Gas and Supply
- Midalloy, Forney
- Covanta Energy, Eberspaecher North America

Employees (2015/16): 53 FTE
Metal Engineering Division
voestalpine Energy Tubulars

Seamless Steel Tubes for Oil & Gas

- Houston / TX

Main products
- Premium seamless OCTG (Oil Country Tubular Goods) casing & tubing, line pipe of high steel grades and with proprietary connections (threads)
- Green tubes

Top customers
- NOV/Grant Prideco
- U.S. distributors (B&L Pipeco, Premier Pipe, Sooner)

Partnersed with Grant Prideco, a subsidiary of National Oilwell Varco (NOV)