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February 27, 2014

## PUBLIC VERSION

The Honorable Lisa R. Barton  
Acting Secretary  
U.S. International Trade Commission  
500 E Street, S.W.  
Washington, D.C. 20436

Inv. Nos. 701-TA-512 &  
731-TA-1248  
(Preliminary Investigation)  
Number of pages: 17

**Business Proprietary Information has  
been removed from pages 4-8 and  
Appendix 1 of the Post-Conference  
Statement**

***Re: Carbon and Certain Alloy Steel Wire Rod from China --  
Post-Conference Statement of The Lincoln Electric Company***

Dear Secretary Barton:

On behalf of The Lincoln Electric Company ("Lincoln Electric") we hereby electronically submit the confidential version of Lincoln Electric's Post-Conference Statement. We will also file eight true paper copies of this submission with the Commission today.

We will electronically submit the public version of Lincoln Electric's Post-Conference Statement on February 27, 2014, one date after the date of filing. We will also file four true paper copies of the public version with the Commission on that day.

In this submission, Lincoln Electric is providing responses to questions posed by the staff at the conference held on February 21, 2014. Pursuant to Section 201.6 of the

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Commission's Regulations, Lincoln Electric requests business proprietary treatment for certain information designated in brackets "[ ]" in the attached submission. This information includes:

- (1) confidential supplier and sourcing information; and
- (2) confidential information concerning Lincoln Electric's qualification process for potential wire rod suppliers.

Disclosure of this information, which is not otherwise publicly available, would cause substantial harm to the competitive position of Lincoln Electric and other implicated companies and would impair the Commission's ability to obtain similar information in future investigations. Given the nature of the information at issue, it has not been possible to prepare meaningful public summaries. *See* 19 U.S.C. § 1677f(b)(1)(A)(i).

Lincoln Electric consents to the release of its business proprietary information under an appropriate Administrative Protective order ("APO").

The required certification that substantially identical information is not available to the public is set forth as an attachment to this letter, in accordance with section 201.6(b)(3)(iii) of the Commission's rules. Also attached are the required certifications regarding the accuracy and completeness of the information contained in the submission.

Copies of this submission are being served on the parties identified in the attached certificate of service.

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Please contact the undersigned if there are any questions concerning this submission.

Respectfully submitted,



David R. Grace  
Counsel to The Lincoln Electric Company

## CERTIFICATION

I, David R. Grace, of Covington & Burling LLP, counsel to The Lincoln Electric Company, certify pursuant to section 207.3(a) of the Commission's rules that, based on the information available to me, I have no reason to believe that this submission contains any misrepresentation or omission of fact.

I also certify, pursuant to section 201.6(b)(3)(iii) of the Commission's rules, that information substantially identical to the information for which we are requesting proprietary treatment in the attached submission is not otherwise available to the general public.

Pursuant to 28 U.S.C. § 1746, I further declare under penalty of perjury that the foregoing statements are true and correct.

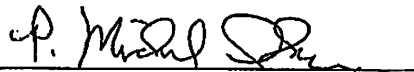
Dated: February 26, 2014

  
\_\_\_\_\_  
David R. Grace

**CERTIFICATION**

I, P. Michael DeShane, Director of North America Consumable Purchasing, currently employed by The Lincoln Electric Company, certify that (1) I have read the attached submission and (2) the information contained in this submission is, to the best of my knowledge, complete and accurate.

Dated: February 26, 2014



P. Michael DeShane  
Director of North America Consumable Purchasing  
The Lincoln Electric Company

## PUBLIC CERTIFICATE OF SERVICE

I, David R. Grace, hereby certify that on this 27th day of February 2014, a copy of the attached public submission was served by first class mail, postage prepaid, on the following:

Alan H. Price, Esq.  
Wiley Rein LLP  
1776 K Street, N.W.  
Washington, D.C. 20006

*Counsel to Nucor Corporation*

Paul C. Rosenthal, Esq.  
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*Counsel to ArcelorMittal USA LLC,  
Charter Steel, Evraz Rocky Mountain  
Steel, Gerdau Ameristeel US Inc., and  
Keystone Consolidated Industries, Inc.*

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Association*



David R. Grace

February 27, 2014

**Business Proprietary Information  
removed from pages 4-8 and Appendix 1**

**PUBLIC VERSION**

UNITED STATES  
INTERNATIONAL TRADE COMMISSION

In the Matter of	)	
	)	
CARBON AND CERTAIN ALLOY STEEL	)	Inv. Nos. 701-TA-512 &
WIRE ROD FROM CHINA	)	731-TA-1248 (Preliminary)

POST-CONFERENCE STATEMENT  
OF  
THE LINCOLN ELECTRIC COMPANY

Counsel:

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February 27, 2014

## INTRODUCTION

This Post-Conference Statement is submitted on behalf of The Lincoln Electric Company (“Lincoln Electric” or the “Company”). At the Staff Conference, Lincoln Electric’s witness provided evidence demonstrating that the welding quality wire rod purchased by the Company is not fungible with other types of wire rod, but rather, has important technical differences that make it suitable for use in critical construction, industrial, and military applications.

Lincoln Electric’s witness further testified that the Company has developed over 45 proprietary specifications for carbon and alloy welding quality wire rod, and that despite its track record of working in close cooperation with the U.S. wire rod industry over many years, approximately 50 percent of the Company’s proprietary specifications have never been produced in the United States.

Moreover, Lincoln Electric can account for all of the relatively small volume of welding quality wire rod imported from China during the period of investigation (“POI”) and all such imports were high-quality specifications not currently produced in the United States.

This submission will not restate arguments already presented in the testimony, but rather, will address various questions posed to Lincoln Electric by the staff.

Respectfully submitted,



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(202) 662-5368

Counsel to The Lincoln Electric Company



## **ISSUES ADDRESSED**

1. IDENTITY OF QUALIFIED U.S. SUPPLIERS OF WELDING QUALITY WIRE ROD DURING THE POI
2. PRIMARY FOREIGN SOURCES OF WELDING QUALITY WIRE ROD DURING THE POI
3. BACKGROUND CONCERNING THE LINCOLN ELECTRIC QUALIFICATION PROCESS
4. IDENTITY OF QUALIFIED CHINESE SUPPLIERS OF WELDING QUALITY WIRE ROD DURING THE POI

**IDENTITY OF QUALIFIED U.S. SUPPLIERS OF WELDING QUALITY WIRE ROD DURING THE POI**

Ms. Sherman requested that Lincoln Electric identify the two domestic wire rod producers currently qualified to supply welding quality wire rod to Lincoln Electric. *See* Transcript at 128. Those two producers are [ ].

**PRIMARY FOREIGN SOURCES OF WELDING QUALITY WIRE ROD DURING THE POI**

Ms. Turner requested that Lincoln Electric identify the primary foreign countries from which the Company sourced welding quality wire rod during the POI. *See* Transcript at 140.

Those countries are [ ].

**BACKGROUND CONCERNING THE LINCOLN ELECTRIC QUALIFICATION PROCESS**

Ms. DeFilippo requested that Lincoln Electric provide additional background information concerning the Company's qualification process. *See* Transcript at 155-156.

As an initial matter, there is attached a copy of Lincoln Electric's Factory Specification Number SWW185-1, entitled "Procedure for Approving Alloy Suppliers for use in Consumable Division Finished Products." *See* Appendix 1. This is a general specification, which provides guidelines for the development and completion of Supplier Development Programs.

[

]

It is also important to observe that [

]

**IDENTITY OF QUALIFIED CHINESE SUPPLIERS  
OF WELDING QUALITY WIRE ROD DURING THE POI**

Ms. Turner requested that Lincoln Electric identify the Chinese producer(s) currently qualified to supply welding quality wire rod to Lincoln Electric's U.S. facilities and to provide some background on the nature of their qualifications and capacity. *See* Transcript at 159.

During the POI, Lincoln Electric imported welding quality wire rod from [

].

Lincoln Electric imported welding quality wire rod from China [

].

Lincoln Electric currently has [

]. As testified at the Staff Conference, none of these

specifications are currently produced by U.S. wire rod producers. *See, e.g.*, Transcript at 125 and 130.

[

]. Again,

none of the specifications imported from China are currently produced by U.S. wire rod producers. *See id.*

The total theoretical capacity of the [

].

# **APPENDIX 1**

Lincoln Electric Factory Specification Number SWW185-1, entitled "Procedure for Approving Alloy Suppliers for use in Consumable Division Finished Products."



Lincoln Electric Factory Specification Number SWW185-1, entitled "Procedure for Approving Alloy Suppliers for use in Consumable Division Finished Products."