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April 24, 2017

FILED ELECTRONICALLY (VIA EDIS)

NONCONFIDENTIAL VERSION

The Honorable Lisa R. Barton  
Secretary  
U.S. INTERNATIONAL TRADE COMMISSION  
500 E Street, S.W., Room 112-A  
Washington, D.C. 20436

USITC Inv. Nos. 701-TA-573-574  
and 731-TA-1349-1358 (Preliminary)

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*Confidential Business Information Has Been Deleted  
from Pages 2, 19, 23 and 25, as well as throughout  
Exhibit 1, and CBI Exhibits 8, 10-15, 17-19 and 21  
Have Been Omitted from This Postconference Brief.*

*Confidential Version May Be Released under APO.*

Re: *Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Korea,  
Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates,  
and the United Kingdom: Postconference Brief*

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Dear Madam Secretary:

On behalf of the American Wire Producers Association ("AWPA"), we respectfully submit the nonconfidential version of a *Postconference Brief*, pursuant to 19 C.F.R. §§ 201.8(d) and 207.3(c). The confidential version of this *Postconference Brief* was filed with the U.S. International Trade Commission on April 21, 2017.

Confidential business information has been deleted from pages 2, 19, 23 and 25, as well as throughout Exhibit 1, and CBI Exhibits 8, 10-15, 17-19, and 21 have been omitted from this *Postconference Brief*. Pursuant to 19 C.F.R. §§ 201.6(c) and 207.3(c), we have marked these pages and exhibit in which proprietary information has been deleted with "PUBLIC VERSION."

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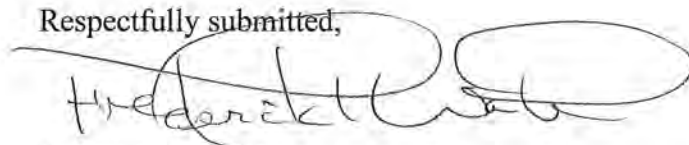
THE HONORABLE LISA R. BARTON  
U.S. INTERNATIONAL TRADE COMMISSION  
April 24, 2017  
Page 2

This deleted proprietary information concerns or relates to the actual experiences of individual AWPAs member companies as purchasers of the products subject to these investigations. None of this information is generally available to the public, and its disclosure would cause substantial harm to the competitive position of the companies which provided the information. Accordingly, it is appropriate to grant confidential treatment of this proprietary information in accordance with 19 C.F.R. § 201.6(d).

Pursuant to 19 C.F.R. §§ 201.16(b) and 207.3(b), nonconfidential versions of this *Brief* have been served upon the parties listed on the attached *Public Certificate of Service*.

The undersigned counsel for the AWPAs certify that the factual information contained in this *Brief* is, to the best of our knowledge, accurate and complete.

Respectfully submitted,



Frederick P. Waite  
Kimberly R. Young

*Counsel for*  
*the AMERICAN WIRE PRODUCERS ASSOCIATION*

FPW:KRY:daj


Attachments

cc: All Parties Listed  
on the attached *Public Certificate of Service*

**CERTIFICATION OF ACCURACY AND COMPLETENESS**

*CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY, UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM*  
INV. NOS. 701-TA-573-574 AND 731-TA-1349-1358 (PRELIMINARY)

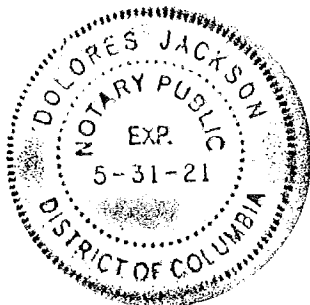
I, FREDERICK P. WAITE, certify that I have read the attached *Postconference Brief* (Nonconfidential Version) on behalf of the AMERICAN WIRE PRODUCERS ASSOCIATION. Based upon the information made available to me, I have no reason to believe that this submission contains any material misrepresentation or omission of fact, and I certify that the confidential information deleted from this submission is not available in substantial form to the public.

  
FREDERICK P. WAITE

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DISTRICT OF COLUMBIA        )        SS:

Sworn to and subscribed before me this 24<sup>th</sup> day of April, 2017, in the District of Columbia.



  
(Notary Public)

**DOLORES JACKSON**  
NOTARY PUBLIC DISTRICT OF COLUMBIA  
My Commission Expires May 31, 2021

My Commission Expires: May 31, 2021

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CBI Exhibits 8, 10–15, 17–19 and 21 Have Been Omitted  
from This Postconference Brief.*

*Total Pages: 200*

*Confidential Version May Be Released under APO.*

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**BEFORE  
THE UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

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**IN THE MATTER OF THE ANTIDUMPING AND  
COUNTERVAILING DUTY INVESTIGATIONS OF:**

**CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM  
BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN,  
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THE UNITED KINGDOM**

USITC  
INV. NOS. 701-TA-573—574  
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(PRELIMINARY)

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**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

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Dated: April 24, 2017



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**BEFORE  
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**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

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**I. INTRODUCTION**

Perhaps the greatest change in the conditions of competition since the U.S. International Trade Commission last considered a series of wire rod petitions against multiple foreign countries is the dramatic reduction in the size of the domestic rod market. Today U.S. apparent consumption of wire rod is a fraction of what it was before the 2001 petitions against twelve countries. As shown in this *Postconference Brief*, the decline in consumption is tied to the imposition of antidumping and countervailing duty orders on foreign-sourced wire rod, negatively impacting the domestic rod industry's customer base and eventually the domestic rod industry itself. Other conditions of competition which indicate that imports are not the cause of any problems experienced by the domestic rod producers are the frequent, substantial, and continuing price increases by the domestic rod mills, the role which non-price factors play in purchasing decisions, and the multiple sourcing imperative for rod customers as well as the fact

that the U.S. rod mills compete directly with their customer base in downstream wire and wire products markets. Each of these conditions will be fully discussed in this brief.

**II. THE DOMESTIC MARKET FOR STEEL WIRE ROD HAS SHRUNK DRAMATICALLY, LARGELY AS THE RESULT OF PREVIOUS TRADE ACTIONS AGAINST IMPORTED WIRE ROD**

Perhaps the most significant change in the conditions of competition in the domestic market for carbon and certain alloy steel wire rod has been the dramatic reduction in U.S. apparent consumption of these products. This change is noticeable when comparing current consumption levels with consumption during the periods prior to the previous series of antidumping and countervailing duty cases against wire rod from twelve countries in 2001.<sup>1</sup> Prior to 2001, U.S. apparent consumption of wire rod was approximately eight and one-half million short tons annually.<sup>2</sup> The domestic rod mills benefitted from this large market by producing about five and a half million tons of rod annually—satisfying two-thirds of U.S. consumption.<sup>3</sup> However, by 2016—the year before the current filing of cases against ten countries—U.S. consumption had declined to less [ ] tons—[ ] of pre-2001 levels.<sup>4</sup> The loss of [ ] of its market has had a dramatic impact on the domestic rod industry because its annual production levels are now [ ] short tons, or about [ ] of pre-2001 levels.<sup>5</sup>

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<sup>1</sup> The 2001 cases resulted in orders on wire rod from seven countries—Brazil, Canada, Indonesia, Mexico, Moldova, Trinidad and Tobago, and Ukraine.

<sup>2</sup> See Exhibit 1.

<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> *Id.*

The reason for this reduction in the U.S. rod market is tied largely to the effect of the previous trade cases which have negatively affected the wire companies that are the customer base for the domestic rod mills. As Kimberly Korbel, Executive Director of the American Wire Producers Association (“AWPA”)—whose member companies consume between 75 and 85 percent of the wire rod sold in the United States—explained during the conference:

The real problem faced by the domestic rod mills is that the total demand for their product has declined as a result of trade cases which they have filed. Apparent consumption of wire rod has declined significantly, countries that can no longer sell wire rod to U.S. wire producers because of trade cases continue to produce rod but that rod ends up in finished wire and wire products coming into the U.S.<sup>6</sup>

Because wire producers do not have access to global sourcing of wire rod, they cannot compete with imported wire which means that domestic rod producers lose tonnages from customers who buy less wire rod. This effect is graphically demonstrated in Exhibit 2, which shows the changes in import levels of four representative wire products manufactured by members of the AWPA.<sup>7</sup> Aggregate imports of these products increased from just over one million short tons in 2000—before the previous series of trade cases against imports of wire rod from multiple countries—to more than 1.6 million tons in 2016. On just these four wire products, the domestic rod industry has lost more than 600,000 tons of rod sales annually.<sup>8</sup>

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<sup>6</sup> *Transcript of the Conference in the Matter of Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom, Investigation Nos. 701-TA-573–574 and 731-TA-1349–1358 (Preliminary)* (April 18, 2017) (hereinafter “*Transcript*”) at 21.

<sup>7</sup> See Exhibit 2.

<sup>8</sup> It is noted that the increase in import volumes of wire strand and nails would have been even greater but for the antidumping and countervailing cases brought by American industries against imports of these downstream products.



One example of the negative impact that trade cases on rod have had on the domestic industry that brought them was discussed at the conference by Bob Moffitt, Vice President of Purchasing for the Heico Wire Group:

The 2014 AD CVD affirmative decision on China is a perfect example of the damage that a trade case can do to the domestic rod industry. My company actually bought fewer tons of rod, domestic or imported, as a result of that case. Our largest competitor on the west coast is located in Vancouver, British Columbia. After the U.S. case against China, our competitor had no restrictions on imports on rod from China, and Canadian statistics show a dramatic increase in shipments of wire rod from China to British Columbia. They also can buy rod from Mexico, another country under order in the U.S. This rod from China and Mexico is being converted in Canada to wire, wire products and exported to the U.S. at prices substantially below what we could offer our wire. In the end, countries denied access to the U.S. market will continue to produce wire rod, but it will end up in the U.S. as a finished wire product, not only from that country but from third countries as well.<sup>9</sup>

There is also a further downstream effect when the wire producers' customers are themselves displaced by imports or move their operations overseas. John T Johnson, President of Mid-South Wire Company, noted that the customers of wire producers:

. . . are continually faced with the 'import or build' decision. That is, whether to import the finished wire products or continue to purchase wire from us and make their finished products here in the United States.<sup>10</sup>

Mr. Johnson then listed some of the U.S. industries that have disappeared from the manufacturing landscape here because they have shifted production offshore or have

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<sup>9</sup> *Transcript* at 36–37.

<sup>10</sup> *Id.* at 23–24.

succumbed to imports. They include such American icons as the barbecue grill industry, wire decking, and a myriad of consumer products.<sup>11</sup>

Thus, by bringing blunderbuss trade actions and restricting the sourcing options of its customer base in the United States, the domestic rod industry has itself contributed to the conditions under which it claims to be suffering today.

### **III. MOST OF THE DOMESTIC ROD MILLS ARE VERTICALLY INTEGRATED AND COMPETE DOWNSTREAM WITH THEIR WIRE CUSTOMERS**

In addition to competing with imported wire and wire products, independent wire companies are also forced to compete in the downstream wire products markets with their domestic rod suppliers. All four of the Petitioners—Gerdau, Keystone, Nucor and Charter—are vertically integrated and use their rod internally to produce wire products that compete directly with their rod customers. This downstream competition extends to all types of wire products and market segments, and it is of particular concern for wire companies that have no affiliated source of wire rod.

The AWWA members who appeared at the staff conference spoke repeatedly about this condition of competition. Chris Stauffer of Insteel Industries—a wire company that consumes more than 450,000 tons of wire rod each year, mostly from domestic mills—testified that each of the petitioning companies is also a competitor of his company: “They are vertically integrated producing both wire rod and wire products including welded wire reinforcement and PC strand”—both of which are significant products categories for Insteel. Mr. Stauffer further stated that his domestic rod suppliers “compete with us at every level in the markets we serve

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<sup>11</sup> *Id.* at 24.

throughout the United States in every geographic area.”<sup>12</sup> The President of Mid-South Wire, Mr. Johnson, likewise testified about having to compete with each of the Petitioners and other domestic rod suppliers on downstream wire and wire products. Specifically, Mr. Johnson reported that Petitioners compete with his company “in the chain link fence market, lawn and garden products, in the appliance industry and on drawn wire to name just a few.”<sup>13</sup> Both of these witnesses also expressed concerns about rod availability from domestic mills with whom they compete. As Mr. Johnson stated: “In the event of competing demands for a finite supply of wire rod, we’d expect that these mills will take care of their internal and related wire operations before they ship to outside customers like Mid-South.”<sup>14</sup>

The websites of each of the Petitioners actively promote the wire and wire products that they and their affiliates produce in the United States. Gerdau’s downstream wire categories include drawn wire and welded wire reinforcement.<sup>15</sup> Gerdau’s drawn wire products are used in “original equipment manufacturer (OEM), fixtures, recycling, agriculture, appliance, and construction applications,” and its welded wire reinforcement products are reportedly used in “slabs-on-grade, tilt-up panels, precast concrete design, state highway construction, bridge decks, box culverts, and many other commercial applications.” The website of Keystone Steel & Wire

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<sup>12</sup> *Id.* at 30.

<sup>13</sup> *Id.* at 24.

<sup>14</sup> *Id.* at 24. *See also id.* at 30 (Stauffer). Mr. Moffitt of the Heico Wire Group provided another example of this downstream competition—but with a twist: “In another case, a domestic supplier who sells rod to us for our galvanized wire lines has imported the very product we have in the past produced from their rod.” *Id.* at 36.

<sup>15</sup> *See* Exhibit 3.

highlights its production of industrial wire and agricultural fencing.<sup>16</sup> Keystone’s Red Brand website states that Keystone’s Bartonville, Illinois, location is “one of the largest wire mills in the world with over 2,000,000 square feet of manufacturing space on over 1,000 acres.”<sup>17</sup> The Red Brand Store lists the following wire and wire product offerings: apron fence; barbed wire; deer, orchard & wildlife fence; electric fence wire; field fence; hex netting; horse fence; saltwater netting; sheep & goat fence; smooth wire; staples; stucco netting; T-posts; U-braces; welded hardware cloth; welded wire (utility fence); and yard, garden & kennel fence.<sup>18</sup> Nucor Steel devotes several pages of its product catalog to wire products, noting that the Nucor Wire Products Group operates from five plant locations across the country and that it is able to provide “a large variety of wire products from coast to coast.”<sup>19</sup> Nucor’s product categories range from bright basic wire for use in automotive, appliance, lawn and garden and wire shelving, to welded wire mesh and welded wire reinforcement products for construction applications, to specialized wire products for use in agricultural, residential, and other uses. Like the other Petitioners, Charter Steel also produces wire rod and wire products, although its website does not provide many details about the end uses of its wire. Charter Steel has a sister division—Charter Wire—which is “a major supplier of precision wire products.”<sup>20</sup> According to Charter Wire’s website, it purchases the vast majority of its raw material from Charter Steel, and it offers “virtually no risk of service interruption” due to their integrated supply chain with

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<sup>16</sup> See Exhibit 4.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

<sup>19</sup> See Exhibit 5.

<sup>20</sup> See Exhibit 6.

Charter Steel. The markets and applications served by Charter Wire's products include aerospace, agriculture, automotive, construction/architectural, consumer products, electronics, energy, and industrial.

The Commission collected data on downstream competition between the rod mills and their customers in the last wire rod investigation of China. In that case, data from the domestic mills indicated that "50.2 percent of the downstream products they produced from internally consumed wire rod are also produced by their own customers."<sup>21</sup> Although already significant at half of all products, the Commission further noted that this figure was based on each U.S. wire rod producer reporting downstream competition only with their own customers; "presumably the overlap would be even greater if production of the same downstream products by other { } end users were taken into account."<sup>22</sup> AWWPA members report that Petitioners compete with them on, *inter alia*, drawn wire, bright wire, mesh, basic industrial quality wire, galvanized wire, PC strand, fencing, CHQ wire, specialty wire, armoring wire, and wire for automotive applications.

#### **IV. THE DOMESTIC WIRE ROD INDUSTRY HAS BEEN IMPOSING AND CONTINUES TO IMPOSE SIGNIFICANT AND FREQUENT PRICE INCREASES ON ALL WIRE ROD PRODUCTS**

Throughout 2016 and continuing in 2017, the Petitioners have imposed numerous and significant price increases for all of their wire rod products. These successful price increases began more than a year before the petitions were filed, and they are continuing today.

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<sup>21</sup> See *Carbon and Certain Alloy Steel Wire Rod from China*, Inv. Nos. 701-TA-512 and 731-TA-1248 (Final), USITC Pub 4509 (January 2015), at 12.

<sup>22</sup> *Id.* at n. 49.

Altogether, U.S. rod mills have raised prices between \$270 and \$330 per short ton since January 2016.<sup>23</sup>

Petitioner Gerdau started raising its prices in January 2016 for wire rod products from its mills in Beaumont, Texas, and Jacksonville, Florida. The January price increase was \$30 per short ton for February 2016 shipments, and Gerdau imposed further price increases for shipments in April (\$20), May (\$50), June (\$40), and December (\$40).<sup>24</sup> Gerdau's price increases have continued in 2017 with increases for shipments in January (\$45), February (\$45), and April (\$45 per ton for low carbon rod and \$60 per ton for high-carbon rod).<sup>25</sup> Thus, in just over one year, the price increases for Gerdau's products have totaled \$315 per short ton for low-carbon wire rod and \$330 for high-carbon wire rod.

Petitioner Keystone, which along with the other Petitioners is also a significant producer of downstream wire and wire products, likewise raised its prices continuously during the past year and into 2017.<sup>26</sup> In January 2016, it increased prices for February shipments by \$30 per ton, followed by increases of \$20 per ton for April shipments, \$50 per ton for May, \$30 per ton for June, \$40 per ton for December, and in 2017 by \$45 per ton for January, another \$45 per ton for February, and \$45 per ton for low-carbon rod and \$60 per ton for high-carbon rod for April shipments.<sup>27</sup> Since February 2016, Keystone's total price increases have been

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<sup>23</sup> See Exhibit 7.

<sup>24</sup> *Id.*

<sup>25</sup> *Id.*

<sup>26</sup> *Id.*

<sup>27</sup> *Id.*



\$315 for a short ton of low-carbon wire rod products and \$320 for a short ton of high-carbon wire rod products.

Petitioner Nucor operates rod mills in Arizona, Connecticut, Nebraska, and South Carolina, and it announces its rod prices on a mill-by-mill basis.<sup>28</sup> Like Gerdau and Keystone, Nucor announced price increases of \$30 per ton for all rod products shipped after April 1, 2016, and then continued to increase prices for shipments in April (\$20), May (\$50), June (\$20 per ton for low-carbon rod and \$30 per ton for high-carbon rod), and December (\$40).<sup>29</sup> In 2017, Nucor increased prices by \$45 per ton for both January and February shipments and by \$20 per ton for April shipments from its Kingman, Arizona, mill and by \$45 per ton for low-carbon rod and \$60 per ton for high-carbon rod from its remaining three mills.<sup>30</sup> In total, Nucor's prices increases have amounted to \$270-\$295 per short ton for low-carbon wire rod and \$280-\$310 per short ton for high-carbon wire rod.

The remaining Petitioner, Charter Steel, does not issue price increase letters like Gerdau, Keystone, and Nucor. Instead, Charter adjusts its rod prices month-to-month on the basis of an index calculated from a three-city average price for scrap bushelling.<sup>31</sup>

Pricing discussions between the rod mills and their customers generally start with reference to the price of steel scrap, the primary input for the domestic industry's electric arc furnace ("EAF") operations. As Mr. Johnson of Mid-South explained at the conference:

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<sup>28</sup>

*Id.*

<sup>29</sup>

*Id.*

<sup>30</sup>

*Id.*

<sup>31</sup>

*See Exhibit 8.*

“Domestic rod mill prices are generally tied to scrap prices which have been extremely volatile lately with dramatic swings both up and down.”<sup>32</sup>

The timing of the price notifications sent by the domestic rod mills track the dates of the announcement of scrap prices in *American Metal Market*.<sup>33</sup> Indeed, as mentioned previously, one of the Petitioners—Charter Steel—explicitly ties its rod prices to changes in the pricing of scrap.<sup>34</sup> However, as Mr. Johnson of Mid-South observed:

We have found while U.S. rod prices follow scrap prices up when scrap prices fall the domestic mills don't always reduce their prices. For example, scrap recently dropped 30 dollars a ton but the U.S. rod mills have sent out letters stating that they are retaining their current pricing levels and not acknowledging the scrap decrease.<sup>35</sup>

That pattern can be seen by comparing the changes in scrap prices as reported by *American Metal Market* and the corresponding price notifications from the Petitioners.<sup>36</sup> Moreover, Keystone's CEO confirmed at the conference that:

{O}bviously if any of our costs went down—scrap included—we would never voluntarily change our price to it . . . . Obviously we try and get the highest price we can possibly achieve.<sup>37</sup>

Just as obviously—as the comparison of scrap prices and Keystone's price increase announcements shows—Keystone and the other Petitioners never hesitate to raise rod prices

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<sup>32</sup> Transcript at 26. See also *id.* at 28–29 (Stauffer).

<sup>33</sup> Compare Exhibit 9 with Exhibit 7.

<sup>34</sup> See Exhibit 8.

<sup>35</sup> Transcript at 26.

<sup>36</sup> See Exhibits 7 and 9.

<sup>37</sup> Transcript at 173.

when scrap prices increase. Mr. Stauffer of Insteel also noted that “with monthly pricing negotiations, it's fair to say that every conversation starts with scrap.”<sup>38</sup> He continued:

Did the scrap go up, did the scrap go down? . . . {H}ow does this compare to my price last month, and is there any indication that we would negotiate on behalf of our companies, relative to this change in the index over the prior month?<sup>39</sup>

As shown in Exhibits 7 and 8, the four Petitioners tend to announce price increases between the 8<sup>th</sup> and 14<sup>th</sup> of the month. This very limited lead time prevents wire producers from locking in pricing for extended periods, while customers of the wire producers often insist on extended pricing terms. As Christian Stauffer, Vice President for Sourcing and Logistics at Insteel Industries, testified at the conference:

With no predictable pricing algorithm month to month {from the domestic rod mills}, our efforts to maintain steady inventories and ensure that we have sufficient wire rod for our multiple locations puts us at the mercy of the domestic {rod} industry.<sup>40</sup>

Mr. Stauffer explained that “*The American Metal Market* usually has their scrap analysis completed by the tenth working day of the month, sometimes sooner.”<sup>41</sup> “We have about five to ten days to react to that, because we have to get into the next rolling schedule at the various wire {rod} mills.”<sup>42</sup> By contrast, U.S. manufacturers of wire and wire products can procure wire rod from import sources through long-term contracts with fixed pricing. Mr. Johnson, President of Mid-South Wire, noted that:

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<sup>38</sup> *Id.* at 105.

<sup>39</sup> *Id.* at 106.

<sup>40</sup> *Id.* at 29.

<sup>41</sup> *Id.* at 105.

<sup>42</sup> *Id.* at 106.

{B}uying imported rod allows us to secure business that requires guaranteed long-term pricing. We have customers who request confirmed pricing for two quarters up to a year but the domestic rod mills are unable to provide that kind of predictability. We have to negotiate for volumes with our domestic suppliers and generally they will confirm pricing for one month at a time.<sup>43</sup>

Finally, at the conference, Petitioners referred to their so-called “foreign fighter” prices, claiming that “customers tell us the foreign price and then we're forced to try to match it if we want to keep their business.”<sup>44</sup> However, this concept is actually very different from the superficial discussion by Petitioners. Attached as Exhibit 10 is an explanation of “foreign fighter” transactions which actually cover incremental rod purchases negotiated outside the normal flow of business. These transactions have little or nothing to do with meeting pricing on imported rod. In fact, “foreign fighter” transactions often involve one domestic mill displacing another for the customer’s business.

**V. NON-PRICE FACTORS PLAY A PREDOMINANT ROLE IN THE PURCHASING DECISIONS OF INDEPENDENT U.S. WIRE PRODUCERS**

In making their purchasing decisions, U.S. wire companies must evaluate a number of factors, and price is just one of them. Other factors that inform wire producers’ purchasing decisions are quality, availability, product range and consistency, reliability of supply, delivery time, and—most importantly—the cost of using wire rod in their operations. As the wire company witnesses testified, the cost of the rod versus its price is an important distinction in their purchasing decisions.

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<sup>43</sup> *Id.* at 25–26.

<sup>44</sup> *Id.* at 132 (Canosa).

Mr. Moffitt of Heico described the considerations for a customer in sourcing wire rod:

In deciding where to source rod, the three most important considerations for me are the relationship I have with the vendor, the cost of the rod as opposed to its price and timely delivery.

Vendor relationships are important because I am aware of the capabilities, quality and reliability of each of my suppliers, and I know the mills that I can depend on to ship rod that meets our company's standards. At times we pay a higher price to these domestic mills than their domestic competitors because of these relationships. The cost of the rod is critical. By cost, I do not mean the price on the supply contract, but the actual cost to my company for using the rod in our wire drawing operations.

Prior to any rod negotiations, I must evaluate several factors including coil size, scale weight, mill trimming practices, surface quality and the physical and mechanical properties of the wire rod.

These factors are critical because the lowest priced rod is not necessarily the lowest cost rod. For example, the weight of a coil is important because a smaller coil requires more welds to maintain continuous drawing and smaller coils generate more scrap. So more steel is lost per ton. This increases our costs. With imported rod, we often find damage from mishandling and poor packaging, which contributes to breaks during the wire drawing process.

Higher breakage rates and slower drawing speeds mean that fewer pounds of rod can be drawn per hour. This increases our costs. Domestic mills ship via rail and truck, usually with one heat per load. A heat is a unique melt of steel with consistent physical properties throughout, and we inventory our rod purchases by heat. Imported rod comes in consignments of five to 30,000 tons and heats are always commingled. This makes it more difficult for us to manage our inventory and thus increases our costs. Imported rod must be carried in inventory for longer periods of time because of the larger consignments, which further adds to the cost of the material. So I must always consider the effect of these various factors on the cost of our raw material, and not simply the purchase price from the rod mill. Another key consideration in my purchasing decision is timely delivery. Our wire companies cannot operate efficiently without a reliable and predictable supply. The cheapest rod in the world is of little use to me if it is delivered late or not at all, or if it arrives in an unacceptable condition.<sup>45</sup>

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<sup>45</sup>

*Id.* at 33–35 (*emphasis supplied*).

Terry Hughes, Director of Procurement for Bekaert Corporation in North America, concurred that “the total cost of ownership” is an important factor in purchasing wire rod.<sup>46</sup>

Mr. Stauffer of Insteel Industries described similar considerations when buying wire rod:

In making Insteel’s purchasing decisions, I consider quality, availability and price in that order. Of course price is a factor in negotiations with our rod suppliers, but quality and availability are our primary considerations when deciding from whom to purchase. Other important factors in our purchasing decisions are transportation costs and the condition of the wire rod upon arrival at our plants.<sup>47</sup>

Finally, Mr. Johnson of Mid-South Wire noted similar considerations in his company’s purchasing decisions as well as the ability of the rod mill to produce the specific types of steel required by his customers.<sup>48</sup> In particular, Mr. Johnson described the advantages of wire rod produced by the basic oxygen furnace (“BOF”) process, which is preferred by some of his customers. BOF steel wire rod is not available from domestic mills.<sup>49</sup> Like the other witnesses, Mr. Johnson explained that “the total cost of our rod” is affected by a number of factors—including lead times, delivery arrangements (barge versus truck deliveries), and long-term confirmed pricing, to name a few.<sup>50</sup>

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<sup>46</sup> *Id.* at 40.

<sup>47</sup> *Id.* at 28.

<sup>48</sup> *Id.* at 25–27.

<sup>49</sup> *Id.* at 25.

<sup>50</sup> *Id.* at 25–27.



**VI. WHILE U.S. WIRE PRODUCERS SOURCE PRIMARILY FROM THE DOMESTIC ROD INDUSTRY, THEY MUST MAINTAIN MULTIPLE SOURCES IN ORDER TO ENSURE THE AVAILABILITY OF THIS ESSENTIAL RAW MATERIAL FOR THEIR OPERATIONS**

U.S. manufacturers of steel wire and wire products source the vast majority of their wire rod requirements from the domestic industry, including Petitioners. For example, Insteel Industries, which consumes 450,000 short tons of wire rod annually, purchases between 70 and 75 percent of its requirements from domestic rod mills.<sup>51</sup> Similarly, the Heico Wire Group is one of the largest consumers of wire rod in the United States, and it “bought between 75 and 85 percent of our total requirements from U.S. sources” during the period of investigation.<sup>52</sup> Both Bekaert and Mid-South Wire, which each purchase hundreds of thousands of tons of wire rod annually, testified that they, too, source one-half or more of their rod supplies from domestic mills.<sup>53</sup> This sourcing pattern is common throughout the American wire and wire products industry.

Sourcing from the domestic rod mills is not a new development. Historically, wire producers have satisfied the bulk of their needs from U.S. rod mills, and the remainder was sourced from offshore suppliers. The reason for this purchasing pattern is that it is important for wire companies to have multiple sources for their primary raw material—wire rod—because it comprises such a high cost and essential component in the production of wire and wire products. As Bob Moffitt, Heico’s Vice President of Purchasing, explained at the conference:

Although we prefer to buy from the domestics, we have learned through experience that it is essential to maintain multiple sources of wire rod. As a result, we made a strategic business decision

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<sup>51</sup> *Id.* at 28 (Stauffer).

<sup>52</sup> *Id.* at 33 (Moffitt).

<sup>53</sup> *Id.* at 23 (Johnson) and 37–38 (Hughes).

some years ago that we would purchase between 25 and 30 percent of our wire rod requirements from offshore producers, and the remaining—between 70 and 75 percent—domestically. . . . It is not a question of either/or. It is a question of having both sources available to us.<sup>54</sup>

Mr. Stauffer of Insteel described a similar approach for his company:

Insteel does not buy imported rod instead of domestic rod. We consistently buy from domestic and import sources because our commitments to our customers require a continuous supply of rod from all sources.<sup>55</sup>

Thus, purchasers have learned the necessity of multiple sourcing. Rather than relying on a single domestic supplier for any one rod product, wire companies try to select at least two domestic mills—more if possible—to supply the product as well as identifying foreign producers as potential sources. In this way, purchasers can minimize the effect on their operations when one supplier's wire rod becomes unavailable for any reason.

The wisdom of this multiple-sourcing strategy is demonstrated when there are availability issues with domestic sources, which rod purchasers have experienced during the period of investigation and which are continuing today. As manufacturers themselves, independent wire producers must be able to ensure the availability of adequate quantities and qualities of their wire rod requirements. They cannot permit disruptions or delays at one supplier's mill to impact adversely their operations and their ability to meet the demand of their customers. Mr. Johnson of Mid-South Wire described the delays and limitations on rod supply that his company has seen:

{W}e are already hearing from some U.S. rod mills about allocations in the near future and they tell us they are either fully

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<sup>54</sup>

*Id.* at 33.

<sup>55</sup>

*Id.* at 29.

booked or getting booked. Of course, they don't call them allocations. Instead they call them "controlled order entry". We are already experiencing delivery delays on orders that we placed before these cases were filed. Some domestic mills have experienced unplanned outages and other production issues which could create supply issues as well. . . . {W}e have found that lead times and deliveries from some of the U.S. Mills have been irregular and unpredictable.<sup>56</sup>

Mr. Stauffer of Insteel expressed similar concerns that "in any year the domestic industry will have planned and unplanned outages, as well as production schedules running at 100 percent of current capacity utilization as the mills define scheduled capacity."<sup>57</sup> Indeed, as Mr. Stauffer recounted:

Twice last year, one of the petitioning mills reduced our wire rod order by ten percent because the mill overbooked. We were told that the overbooking was due to strong rebar and rod orders, and that the mill was cutting all customer orders as a result. Insteel was forced to cover our full production requirements elsewhere. The same petitioner informed us that our April 2017 orders would be pushed into May because the mill was full in both March and April. At the end of 2016, another petitioner informed us that they had no production space left in their mill for December, and that they would be unable to produce material for Insteel until January 2017 rolling.<sup>58</sup>

Given these circumstances, multiple sourcing is essential to Mr. Stauffer who said that one key requirement of his job is to make sure that Insteel does not run out of wire rod for its operations.<sup>59</sup>

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<sup>56</sup> *Id.* at 24–25. *See also* Exhibit 11.

<sup>57</sup> *Id.* at 31.

<sup>58</sup> *Id.* at 31–32.

<sup>59</sup> *Id.* at 106.

Mr. Moffitt of Heico noted that:

Today, lead times from the domestic mills, which had been four to six weeks, have been stretched to six to eight weeks.<sup>60</sup>

Mr. Hughes of Bekaert has had a similar experience:

One domestic mill has Bekaert on monthly allocations, and lead times have been extended by domestic rod mills including all four petitioners. We tried to rely heavily on the domestic suppliers during the past two quarters, but they are behind in deliveries. A number of domestic mills have told us that they are almost fully booked through the end of the second quarter 2017.<sup>61</sup>

The domestic rod mills have acknowledged that the increasing demand for wire rod has affected both pricing and availability. [ ] has advised customers that [

] and [

] <sup>62</sup> Yet at the conference, Keystone's

Vice President for Sales tried to minimize the effect of delays in supplying customers by claiming that "during the POI if one of our customers called and maybe their imports were late on every inquiry we made sure that we helped them and we got them the product that they needed when they needed it."<sup>63</sup> However, as Exhibit 13 clearly shows, [

]. In that instance, [

]. The Director of Marketing for Gerdau also sought to

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<sup>60</sup> *Id.* at 35.

<sup>61</sup> *Id.* at 40.

<sup>62</sup> *See* CBI Exhibit 12.

<sup>63</sup> *Transcript* at 170. Counsel for Nucor also attempted to downplay the adverse effects of outages on wire rod purchasers, but the evidence submitted by wire companies that have to deal with the real world consequences of delayed or cancelled rod orders belies that facile observation.

downplay the consequences of outages and delayed deliveries on his customers: “Yes, sometimes we do have plant outage in our mills that might have a blip here and there of delayed delivery, but that's normal for the operations. It's not a fundamental problem of not delivering the material or not having capacity.”<sup>64</sup> But it is a fundamental problem for wire producers that are counting on the delivery of their orders to meet their obligations to their customers. As Exhibit 14 shows, these “blips” have significant adverse effects on the operations of wire companies.<sup>65</sup> As Mr. Moffitt of Heico testified at the conference, regardless of any other considerations, wire rod is of little use to his company if it arrives late or not at all.<sup>66</sup>

**VII. ALTHOUGH THE U.S. WIRE ROD INDUSTRY DOES NOT MAKE TIRE CORD WIRE ROD IN GRADES 1080 AND ABOVE AND NONE ARE QUALIFIED TO MAKE IT DESPITE EFFORTS TO DO SO, THESE PRODUCTS HAVE BEEN INCLUDED IN THE SCOPE OF THESE INVESTIGATIONS WHICH THREATENS PLANNED INVESTMENTS TO MEET GROWING DEMAND IN THE AUTOMOTIVE SECTOR**

During the preliminary conference, there was extensive testimony and discussion about tire cord wire rod and to a lesser extent tire bead wire rod without any explanation about how tire cord and tire bead are used. Both of these rod products are drawn into wire—one for the production of tire cord and the other for tire bead. The website of The Bridgestone Group provides descriptions of the various parts of a tire—including: (1) the tire beads which are “designed to firmly grip the tire to the wheel” and “contain a steel loop made from a bundle of fine steel wire, making the bead extremely strong” and (2) the tire cords which form the belt of the tire (under the tread) and provide stiffness to the tread and protect the internal parts of

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<sup>64</sup> *Transcript* at 172.

<sup>65</sup> *See also* Exhibit 15.

<sup>66</sup> *Transcript* at 35.

the tire.<sup>67</sup> A production diagram from Bridgestone's website shows the lengthy production process to twist, spin, and weave the tire cord wire into the fabric cord that becomes the steel belting of the tire. The production process for the bead wire—forming and covering with rubber—is much less complicated by comparison.<sup>68</sup>

Several witnesses at the conference testified that demand for tire cord and tire bead has been growing steadily from tire manufacturers. For example, Mr. Terry Hughes, Director of Procurement at Bekaert Corporation North America reported that his company—which uses between 350,000 and 360,000 tons of wire rod annually—“recently invested several million dollars in our Rome, Georgia facility, that uses steel tire cord wire rod to produce material for North American tire and reinforced hose markets. Automotive markets performed well throughout 2016 and are projected to remain strong this year.”<sup>69</sup> Mr. Nystrom from Nucor agreed that for the automotive sector of the market, 2014 through 2016 were “pretty good years steady and increasing slightly.”<sup>70</sup> Mr. David Minnick, CEO of Kiswire America which operates two bead wire plants and two tire cord plants in South Carolina and Arkansas, also reported significant investments by his company: “We have invested \$250 million in these plants, and are investing an additional \$50 million to expand the tire cord production.”<sup>71</sup> Mr. Minnick also reported that over the past four years, seven new tire factories have been built in

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<sup>67</sup> See Exhibit 16.

<sup>68</sup> *Id.*

<sup>69</sup> *Transcript* at 38.

<sup>70</sup> *Id.* at 180.

<sup>71</sup> *Id.* at 41.



the United States.<sup>72</sup> Mr. Minnick further testified that tire cord (wire) capacity in the United States is approximately 170,000 tons and growing, with demand projections of approximately 350,000 tons annually.<sup>73</sup> In order to meet this growing demand, Mr. Hughes testified that Bekaert had planned to implement a major expansion in its plant in Rogers, Arkansas, that would increase North American tire cord wire production capacity by 50 percent and add over 100 new jobs, but this investigation has put those plans on hold: “At this point, our investment plans are on hold pending resolution of this case, as undertaking such commitment does not make business sense if the steel tire cord wire rod will not be available from imported BOF suppliers.”<sup>74</sup>

The witnesses from Bekaert and Kiswire further explained the importance of the BOF production process with respect to tire cord and tire bead wire rod production. None of the U.S. rod mills are BOF mills; they all use the EAF technology which is based on scrap. These witnesses and others emphasized that the BOF process produces a product with fewer residual (tramp or unwanted) elements and more consistent tensile properties which is essential for a product like tire cord wire rod.<sup>75</sup> BOF material is only available from mills outside the United States. Rod mills in Ukraine, South Africa, Korea, United Kingdom, Turkey, and

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<sup>72</sup> *Id.* at 95. *See also* Exhibit 17 regarding announced tire plant investments in the United States. *See also Transcript* at 46 (“Korean tire companies Hankook Tire and Kumho Tire have announced investment plans to build tire factories in the U.S.”) (Ryoo).

<sup>73</sup> *Id.* at 43–44.

<sup>74</sup> *Id.* at 38.

<sup>75</sup> *Id.* at 25 (Johnson); 39 (Hughes); 43 (Minnick); 45 (Ryoo); and 68 (Hughes).

Spain produce using the BOF process (although not all of these sources are capable of producing tire cord wire rod).<sup>76</sup>

Because tire cord and tire bead are used in the manufacture of tires and high pressure hoses (where potential liability for product failures is enormous), there are very lengthy and demanding qualification and certification requirements for these products. Mr. Hughes of Bekaert Corporation testified that it takes about two years to qualify a supplier of steel tire cord wire rod.<sup>77</sup> He also noted that “[e]ach time we want to qualify a new rod supplier, Bekaert has to requalify itself with the tire manufacturers. This process is not only time-consuming but also expensive for all parties involved.”<sup>78</sup> Mr. Minnick of Kiswire agreed that the timeframe for the approval process for steel cord was two or more years, and he reported that it is roughly six months to a year for tire bead wire to be approved by a tire company.<sup>79</sup> A typical qualification time line from a tire manufacturer is attached as Exhibit 18.<sup>80</sup>

In response to a question about whether any domestic rod mills have been qualified to supply 1080 tire cord wire rod, both Mr. Hughes of Bekaert and Mr. Minnick of Kiswire reported that they had no one qualified domestically, despite efforts by both to qualify

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<sup>76</sup> *Id.* at 39.

<sup>77</sup> *Id.*

<sup>78</sup> *Id.* at 40.

<sup>79</sup> *Id.* at 42.

<sup>80</sup> Mr. LaRocca of the ITC Staff requested copies of product descriptions and certification information for tire cord wire rod. *See Transcript* at 111. In response to this request, attached as Exhibit 19 are [ ] steel cord rod specification data sheets for 1080 and 1090 tire cord. Mr. Keun Hwang of POSCO noted during the conference that “[t]en years ago, most of the tire cord was made out of 60 grade or 70 grade. Recently, most of the tire cord is made of 80 or 90, so most of the steelmakers need to improve all quality and development technology.” *Id.* at 86.

a domestic mill.<sup>81</sup> Mr. Minnick testified that Kiswire’s facility in Pine Bluff—which was previously owned by ArcelorMittal—tried to qualify ArcelorMittal’s rod mill in Georgetown, South Carolina, but “{t}hat mill was never capable of achieving a 1080 grade steel that would meet the specification needed to produce high tensile {tire cord} wire products.”<sup>82</sup> Mr. Ryoo, sales manager for POSCO America, testified that his company does not compete with any of the domestic rod mills for tire cord or tire bead:

With the technology and raw materials they use, U.S mills have not made commercially meaningful inroads into the tire cord segment of this market. I do not recall any time where I have had to compete for business with the U.S. mills for tire cord and bead wire. Our competitors are other foreign suppliers who can also produce tire cord quality rod to demanding performance requirements.<sup>83</sup>

When the Petitioners were asked whether any present U.S. producers make 1080 grade tire cord wire rod, Mr. Ashby reported that Keystone produces 1080 grade wire rod for PC strand applications and that the mill also makes tire bead wire rod, but Keystone does not make 1080 tire cord wire rod.<sup>84</sup> Mr. Canosa of Gerdau similarly responded that his company makes 1080 grade wire rod generally but not 1080 tire cord wire rod.<sup>85</sup> Mr. Nystrom of Nucor also confirmed that his company does not make 1080 tire cord wire rod, but he noted that Nucor’s facility in Darlington, South Carolina is currently involved in trials for the production of

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<sup>81</sup> *Id.* at 108–109.

<sup>82</sup> *Id.* at 42. This is contrary to what the Commission staff was told regarding that mill’s capabilities in the Chinese wire rod case in 2014.

<sup>83</sup> *Id.* at 45–46.

<sup>84</sup> *Id.* at 154–155. Mr. Stauffer of Insteel stated that his company does not purchase tire cord or tire bead wire rod, but they do use a large diameter 1080 product for PC strand, but “nowhere near the specifications of the tire cord tire bead.” *Id.* at 69–70.

<sup>85</sup> *Id.* at 155.

1080 bead wire rod.<sup>86</sup> The website of one of the non-Petitioners—EVRAZ Rocky Mountain Steel—suggests that this mill may produce tire cord and tire bead wire rod.<sup>87</sup> However, [

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Given that the U.S. wire rod industry does not make tire cord wire rod in grades 1080 and above and none of the domestic mills are qualified to make these products despite efforts to qualify them, these products should not be included in the scope and instead should be considered a separate like product.<sup>89</sup>

#### **VIII. THE CLOSURES OF GEORGETOWN STEEL AND REPUBLIC STEEL’S LORAIN MILL WERE DUE TO FACTORS OTHER THAN SUBJECT IMPORTS**

During the preliminary staff conference, there was considerable discussion of the idling of Republic Steel’s facility in Lorain, Ohio, in 2016 and the closure of ArcelorMittal’s Georgetown, South Carolina facility in 2015. Petitioners attribute these closures to the impact of unfairly traded imports,<sup>90</sup> although they cite no evidence that links the shuttering of these mills to the subject imports in this case.

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<sup>86</sup> *Id.* at 155 and 157.

<sup>87</sup> *See* Exhibit 20.

<sup>88</sup> *See* Exhibit 21.

<sup>89</sup> *See* Postconference Briefs on behalf of British Steel and the Korean respondents.

<sup>90</sup> *See id.* at 19 (Price); 120 (Rosenthal); 134 (Canosa); and 140 (Brown).

**A. REPUBLIC STEEL’S LORAIN, OHIO MILL WAS IDLED IN JANUARY 2016**

Contemporaneous news accounts regarding the idling of Republic’s Lorain mill indicate that there were other factors that led to that decision. One source clarified that Republic’s blast furnace had been “idled” since 2008 and that Republic was idling the rolling mill operations at that location by March 2016.<sup>91</sup> The same source also reported that Republic’s Lorain mill is situated next to U.S. Steel’s Tubular Operations and that Republic had previously supplied input material for U.S. Steel’s pipe production at that location:

In July 2015, Republic Steel stopped supplying rounds to the U.S. Steel side, idling Republic Steel’s electric arc furnace. The rounds were the solid metal bars that U.S. Steel reformed to create steel pipe. ...U.S. Steel’s Lorain Tubular Operations have suffered largely due to low-cost imports ‘dumped’ onto the steel market. Low gas and oil prices also mean there is less fracking and rigging for gas and oil exploration and drilling.<sup>92</sup>

The impact of the dropping oil and gas prices was also cited in another news story to explain Republic’s 2015 announcement that it was idling its electric arc furnace:

Republic announced in July {2015} that it was idling its newly built electric arc furnace indefinitely because of the oil glut that has seen oil and gas prices plunge, driving down demand for steel for use in the drilling and fracking industries. The arc furnace was part of a \$120 million investment that Republic made in its Lorain plant and opened in 2014 to great fanfare before the oil and gas exploration market crashed.<sup>93</sup>

Since then, Republic’s Lorain facility has been producing special bar quality steel for the automotive industry, according to the earlier news report. But the president of the USW local explained that, although the auto industry was doing well, it was ““very, very competitive” so

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<sup>91</sup> See Exhibit 22 (“Republic Steel announces plan to idle Lorain mill,” *The Morning Journal*, January 7, 2016).

<sup>92</sup> *Id.*

<sup>93</sup> See Exhibit 23 (“Republic Steel to idle Lorain plant,” *The Chronicle*, January 8, 2016).

orders have been slim for the Lorain plant.”<sup>94</sup> Thus, the reasons for Republic Steel’s decision to idle its Lorain plant appear to have nothing to do with competition in the wire rod market or subject imports.

**B. ARCELORMITTAL’S GEORGETOWN, SOUTH CAROLINA, MILL CLOSED IN AUGUST 2015**

During the preliminary conference, two customers of the Georgetown mill addressed the reasons that ArcelorMittal shut down its rod mill in Georgetown, South Carolina in 2015. Both customers cited reasons other than imports for this closure. David Minnick, CEO of Kiswire America who hails from South Carolina, testified that he had been to the Georgetown mill numerous times in his unsuccessful attempts to qualify the mill to produce 1080 tire cord wire rod. According to Mr. Minnick, the rod mill in Georgetown was located along the river in Georgetown and connected to the bay and port which was built to serve the area. At one point in time, Georgetown Steel had operated its own DRI plant at that location, but that plant was closed and the DRI-producing equipment was sold. When later the mill started using DRI again for its wire rod production, the DRI had to be imported. However, raw materials such as DRI could not be delivered to the rod mill via the surrounding waterways because the navigation channel had filled with silt and was no longer passable.<sup>95</sup> Chris Stauffer of Insteel agreed that the rod mill’s inability to have its raw materials delivered in the most cost-effective way was a major disadvantage for Georgetown:

That’s an Army Corps of Engineers’ issue as to whether or not you dredge or not dredge a particular river. When they lose that access, you lose the inflow of this raw material. It still comes, but it

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<sup>94</sup> See Exhibit 22 (“Republic Steel announces plan to idle Lorain mill,” *The Morning Journal*, January 7, 2016).

<sup>95</sup> *Transcript* at 83–84.

comes through alternative ports. Then it has to be transported from that alternative port to the facility itself. We estimate that that costs maybe \$50 or \$60 a ton. In their raw material costs acquisition, that puts them at a disadvantage relative to the domestic industry that they're competing with.<sup>96</sup>

Local news stories regarding the fate of the steel mill site and the Georgetown port confirm the accounts by these witnesses. In one article, the mayor of Georgetown explained that the local government wants to redevelop the port property along with the steel mill site and replace them with “a mixture of waterfront businesses and light industry.”<sup>97</sup> According to the same article, the mayor said that it was “not feasible” to operate a maritime facility in the area because “{t}he fast-silting harbor makes it difficult for ships to visit the port and it will take \$66 million—money the federal government says it doesn’t have—to deepen the channel to its maximum 27-foot depth.”<sup>98</sup>

Furthermore, Mr. Stauffer noted that, while the Georgetown mill was struggling with this material transportation issue and its adverse effects on overall costs, Nucor decided to build a new rod mill in Darlington, South Carolina. “They spent everything they could on that new mill, in terms of technology and built a fine facility and we compliment them for that. But it does take their cost structure and make it appreciably different than the one in Georgetown.

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<sup>96</sup> *Id.* at 85. *See also* Exhibit 24.

<sup>97</sup> *The South Strand News* reported in March 2017 that the Georgetown City Council has voted to approve a resolution to rezone the steel mill site and the surrounding area to permit mixed uses. *See* Exhibit 25 (“In 4-3 vote, Georgetown council passes resolution to rezone steel mill site,” *Georgetown City News*, March 16, 2017).

<sup>98</sup> *The South Strand News* reported on April 17, 2017, that U.S. Senator Lindsey Graham visited Georgetown to discuss “the fate of the steel mill and other issues” and told local officials that the 2018 budget reduces funding for the Army Corps of Engineers—the entity responsible for the decision whether to dredge the port of Georgetown. *See* Exhibit 26 (“Sen. Graham stops by Georgetown for an update,” *The South Strand News*, April 17, 2017).

So there has to be a contributing factor in two mills in South Carolina and their ability to service the market, in the local market particularly, in a cost-competitive fashion. So I'd suggest that the industry itself has helped Georgetown in Georgetown, South Carolina, close its doors.”<sup>99</sup>

Thus, ArcelorMittal shuttered the Georgetown mill because the shallow channel forced it to divert its raw material deliveries to other ports which increased the mill's cost structure while at the same time one of ArcelorMittal's domestic competitors—Nucor Steel—built a state of the art rod mill in Georgetown's own backyard. Neither of these factors can be attributed to subject imports.

## **IX. CONCLUSION**

For the foregoing reasons, we respectfully urge the Commission to make a negative determination in these preliminary investigations.

Respectfully submitted,

/ s / Frederick P. Waite

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April 24, 2017

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<sup>99</sup> *Transcript at 85–86.*



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*Confidential Business Information Has Been Deleted  
from Exhibit 1, and CBI Exhibits 8, 10–15, 17–19 and 21  
Have Been Omitted from This Postconference Brief.*

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*Confidential Version May Be Released under APO.*

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**BEFORE  
THE UNITED STATES INTERNATIONAL TRADE COMMISSION  
WASHINGTON, D.C.**

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**IN THE MATTER OF THE ANTIDUMPING AND  
COUNTERVAILING DUTY INVESTIGATIONS OF:**

**CARBON AND CERTAIN ALLOY STEEL WIRE ROD FROM  
BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN,  
TURKEY, UKRAINE, THE UNITED ARAB EMIRATES, AND  
THE UNITED KINGDOM**

**USITC  
INV. NOS. 701-TA-573—574  
AND 731-TA-1349—1358  
(PRELIMINARY)**

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**EXHIBITS**

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

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*COUNSEL:*

FREDERICK P. WAITE  
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1909 K Street, NW, Ninth Floor  
Washington, DC 20006-1152

1-(202) 467-8852 / 8881

*Counsel for AMERICAN WIRE PRODUCERS  
ASSOCIATION*

Dated: April 24, 2017

**EXHIBIT LIST**

EXHIBIT 1	U.S. CONSUMPTION AND DOMESTIC CONSUMPTION OF STEEL WIRE ROD	Confidential Business Information (“CBI”) and Public Versions
EXHIBIT 2	U.S. IMPORTS OF CERTAIN STEEL WIRE PRODUCTS FROM ALL SOURCES	Public Exhibit
EXHIBIT 3	EXCERPTS FROM GERDAU’S WEBSITE	Public Exhibit
EXHIBIT 4	EXCERPTS FROM KEYSTONE/ RED BRAND’S WEBSITES	Public Exhibit
EXHIBIT 5	EXCERPTS FROM NUCOR’S WEBSITE AND PRODUCT REFERENCE GUIDE	Public Exhibit
EXHIBIT 6	EXCERPTS FROM CHARTER STEEL AND CHARTER WIRE’S WEBSITES	Public Exhibit
EXHIBIT 7	PRICE INCREASE ANNOUNCEMENTS BY DOMESTIC ROD MILLS	Public Exhibit
EXHIBIT 8	CHARTER STEEL’S PRICING MECHANISM	CBI Exhibit
EXHIBIT 9	AMM SCRAP PRICES	Public Exhibit
EXHIBIT 10	“FOREIGN FIGHTER” TRANSACTIONS	CBI Exhibit
EXHIBIT 11	DELAYED DELIVERY OF WIRE ROD	CBI Exhibit
EXHIBIT 12	PRICE INCREASES	CBI Exhibit
EXHIBIT 13	DELAYED DELIVERY OF ROD	CBI Exhibit
EXHIBIT 14	ROD AVAILABILITY AND DELIVERY DELAYS	CBI Exhibit
EXHIBIT 15	RECENT SERVICE AND LEAD TIME ISSUES	CBI Exhibit
EXHIBIT 16	BRIDGESTONE: BASIC KNOWLEDGE OF TIRES	Public Exhibit
EXHIBIT 17	TIRE PLANT INVESTMENTS OVER THE PAST TWO YEARS	CBI Exhibit
EXHIBIT 18	TIRE CORD QUALIFICATION TIMELINE	CBI Exhibit
EXHIBIT 19	1080 AND 1090 TIRE CORD SPECIFICATION DATA SHEETS	CBI Exhibit
EXHIBIT 20	EXCERPT FROM EVRAZ ROCKY MOUNTAIN’S WEBSITE	Public Exhibit

EXHIBIT 21	QUALIFICATION EFFORTS	CBI Exhibit
EXHIBIT 22	“REPUBLIC STEEL ANNOUNCES PLAN TO IDLE LORAIN MILL,” <i>THE MORNING JOURNAL</i> (JANUARY 7, 2016)	Public Exhibit
EXHIBIT 23	“REPUBLIC STEEL TO IDLE LORAIN PLANT,” <i>THE CHRONICLE</i> (JANUARY 8, 2016)	Public Exhibit
EXHIBIT 24	“NO TIMELINE, BUT SPA AGREES TO SHUT GEORGETOWN PORT UNDER REUSE PLAN,” <i>THE POST AND COURIER</i> (JANUARY 24, 2017)	Public Exhibit
EXHIBIT 25	“IN 4-3 VOTE, GEORGETOWN COUNCIL PASSES RESOLUTION TO REZONE STEEL MILL SITE,” <i>GEORGETOWN CITY NEWS</i> (MARCH 16, 2017)	Public Exhibit
EXHIBIT 26	“SEN. GRAHAM STOPS BY GEORGETOWN FOR AN UPDATE,” <i>SOUTH STRAND NEWS (GEORGETOWN TIMES)</i> (APRIL 18, 2017)	Public Exhibit

Confidential Business Information Has Been Deleted from This Exhibit.

# **EXHIBIT 1**

## **U.S. CONSUMPTION AND DOMESTIC PRODUCTION OF STEEL WIRE ROD**

**CALENDAR YEARS 1999–2000 AND 2015–2016**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

**U.S. CONSUMPTION AND DOMESTIC PRODUCTION OF STEEL WIRE ROD**

CALENDAR YEARS 1999–2000 AND 2015–2016

*(All figures are in short tons.)*

YEAR	U.S. APPARENT CONSUMPTION	U.S DOMESTIC PRODUCTION
1999	8,335,964 <sup>1</sup>	5,559,846 <sup>2</sup>
2000	8,497,973 <sup>1</sup>	5,461,988 <sup>2</sup>
2015	[ ] <sup>3</sup>	[ ] <sup>3</sup>
2016	[ ] <sup>3</sup>	[ ] <sup>3</sup>

**PUBLIC VERSION**

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<sup>1</sup> *Carbon and Certain Alloy Steel Wire Rod From Brazil, Canada, Egypt, Germany, Indonesia, Mexico, Moldova, South Africa, Trinidad and Tobago, Turkey, Ukraine, and Venezuela*, Investigation Nos. 701-TA-417–421 and 731-TA-953–963 (Preliminary), USITC Pub. 3456 (October 2001) at IV-10.

<sup>2</sup> *Id.* at III-3.

<sup>3</sup> [ ]

Public Exhibit Does Not Contain Confidential Business Information.

## **EXHIBIT 2**

U.S. IMPORTS  
OF  
CERTAIN STEEL WIRE PRODUCTS FROM ALL SOURCES  
  
CALENDAR YEARS 2000—2002 AND 2014—2016

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
**AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

## U.S. IMPORTS OF CERTAIN STEEL WIRE PRODUCTS FROM ALL SOURCES

CALENDAR YEARS 2000–2002 AND 2014–2016

(QUANTITIES ARE IN SHORT TONS FOR ALL PRODUCTS.)

PRODUCT CATEGORIES				
YEAR	WIRE STRAND	WOVEN WIRE FABRIC	WIRE GRILL, NETTING AND FENCING	NAILS AND STAPLES
2000	197,212	33,296	187,484	631,645
2001	202,474	25,582	184,646	596,007
2002	210,901	27,205	201,881	751,423
2014	324,926	341,671	190,056	659,208
2015	325,654	322,145	210,381	739,858
2016	322,299	289,408	234,242	783,337

Source: American Iron and Steel Association, AIS Import Report 3 (2000–2002 and 2014–2016).

Public Exhibit Does Not Contain Confidential Business Information.

**EXHIBIT 3**  
EXCERPTS  
FROM  
GERDAU'S WEBSITE

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
**AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017





GerdaU produces wire rod at two mills in North America, hot-rolling a range of sizes shipped in coils.

Steel Wire Rods are an engineered product made to the exact chemical, mechanical and physical requirements of individual customers and applications. It is estimated that Wire Rods are used to produce more than 100,000 finished products. These include automotive fasteners, barbed wire, nails, galvanized wire, pre-stressed concrete strand, tie wire, ground rods, chains, fencing, bed springs, wire shelving, welding wire, bolts, wire rope, concrete reinforcing mesh, concrete pipe, rubber tire reinforcement wire, annealed wire, staples, steel mesh filters, coat hangers, cold finished bar, threaded rods and many other products.

Reinforcing GerdaU's commitment to environmentally-responsible steel production, all wire rod products are manufactured with high levels of recycled raw scrap material.

## Select a Product Category



Downstream Wire



Wire Rod

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## WIRE ROD

Downstream Wire

Drawn Wire

## Drawn Wire



Gerdau Drawn Wire is produced from wire rod, utilizing a process of chemical descaling, wire drawing, and annealing. Gerdau offers various finishes and mechanical properties of drawn wire to meet customer requirements for welding, bending, forming, cutting, and packaging.

Gerdau drawn wire products are used in original equipment manufacturer (OEM), fixtures, recycling, agriculture, appliance, and construction applications.

[Contact Us](#)

## Technical Specifications

Product	Sizes	Grades
Bright Basic	.029" thru .625"	1005 thru 1075
Bright Plating Quality	.091" thru .500"	1006 thru 1018
Bright Basic Straight & Cut	.062" thru .230"	1005 thru 1018
Black Annealed Wire	.029" thru .550"	1005 thru 1030
Black Annealed Spooled	.062" thru .142"	1005 thru 1026
Black Annealed Straight & Cut	.062" thru .148"	1005 thru 1018
Bright Annealed Wire	.041" thru .135"	1005 thru 1018
High Carbon	.067" thru .148"	1045 thru 1075
Ardox Straight & Cut	.275" & .305"	1006
Ardox Bright Basic	.275" & .305"	1006
FBPQ - Fabricated Wire	.243" thru .470"	1006
Clean & Coated Rod	7/32" thru 11/16"	1005 thru 1075

Specification Type and Number
ASTM - A370
ASTM - A510
ASTM - A82
ASTM - A227

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Catalogs

## Related Products



Welded Wire Reinforcement



Wire Rod

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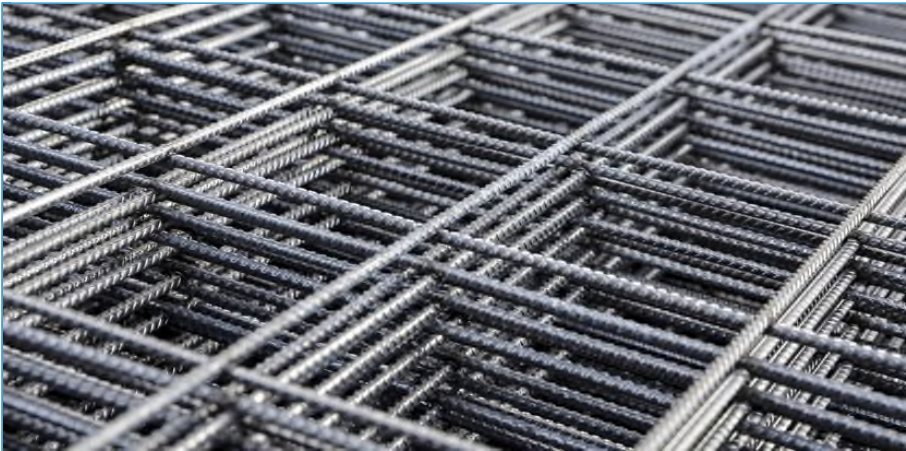


WIRE ROD

Downstream Wire

Welded Wire Reinforcement

Welded Wire Reinforcement



Gerdau Welded Wire Reinforcement is used in slabs-on-grade, tilt-up panels, precast concrete design, state highway construction, bridge decks, box culverts, and many other commercial applications.

Our welded wire reinforcement panels feature advantages in steel area conversions and ribbed wire for better bonding strength in concrete.

Structural and engineered wire reinforcement styles may not be inventoried but are manufactured and shipped in less time than general industry standards. Shipments are on preferred carriers with satellite tracking for instant shipment location.

Contact Us

Technical Specifications

Style	Spacing	Wire Size	Sheet/Roll Size	Specification
Standard	6" x 6" OR 4" x 4"	D1.4/D1.4	5' X 150' 8' X 20' 8' X 15'	ASTM A1064/1064M ASHTO M221
		D2.1/D2.1		
		D2.9/D2.9		
		D3.5/D3.5		
		D4.40/D4.0		
		D5.0/D5.0		
		D6.0/D6.0		
		D8.0/D8.0		
Engineered Structural	Various	D4.0-D31.0	Up to 13' X 40'	

ALL welded wire rod styles can be Epoxy coated or Galvanized at your request.

## Related Products



Drawn Wire

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# **EXHIBIT 4**

## EXCERPTS FROM KEYSTONE/RED BRAND'S WEBSITES

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
**AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017



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[BILLET](#)  
[ROD](#)  
[REBAR](#)  
[INDUSTRIAL WIRE](#)  
[AGRICULTURAL FENCING](#)



## WHY KEYSTONE STEEL & WIRE?



### PROCESS CONTROL

Quality products begin with quality steel. Keystone maintains total control over every step of steel and wire production, from the processing of scrap metal through final packaging. Our capabilities enable KSW to produce the finest American-made steel possible, and then process it to match the most stringent customer specifications. In fact, our internal standards routinely exceed AISI and ASTM standards. Keystone's ability to monitor the process from beginning to end provides a high degree of predictability and consistent quality.



### FLEXIBLE

Keystone's flexibility allows for the production of customized grades of steel to meet individual customer needs quickly and efficiently. KSW has over 20 steel grades that are classified as 1008 steel. We work closely with our customers to help control inventory lead times while meeting exacting specifications for every pound of steel created.

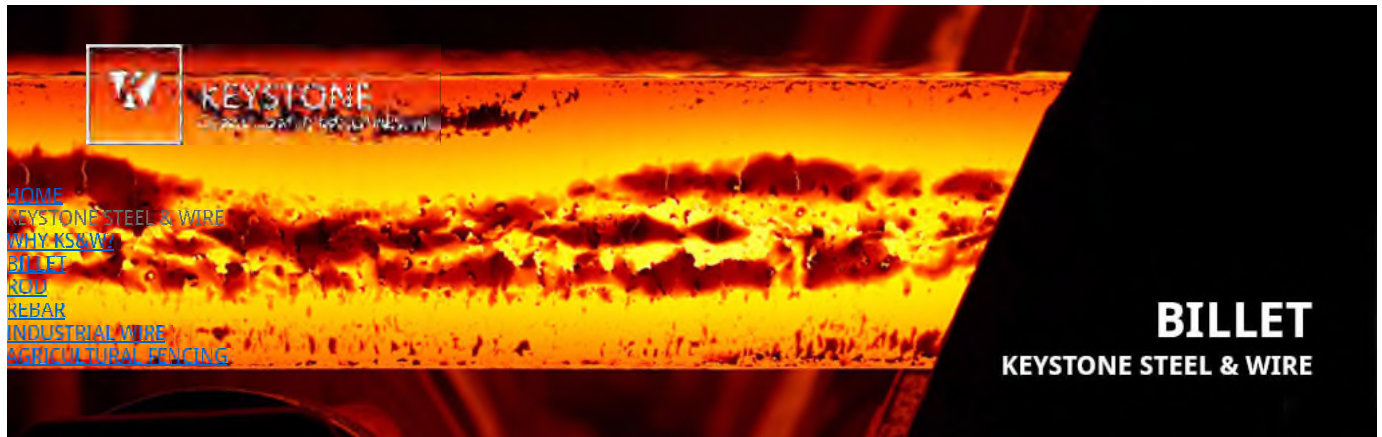


### IDEALLY LOCATED

KSW is strategically located, making it possible to ship by truck, rail or barge. This advantage means we can reach our customers by the most time and cost efficient mode of transportation regardless of destination.

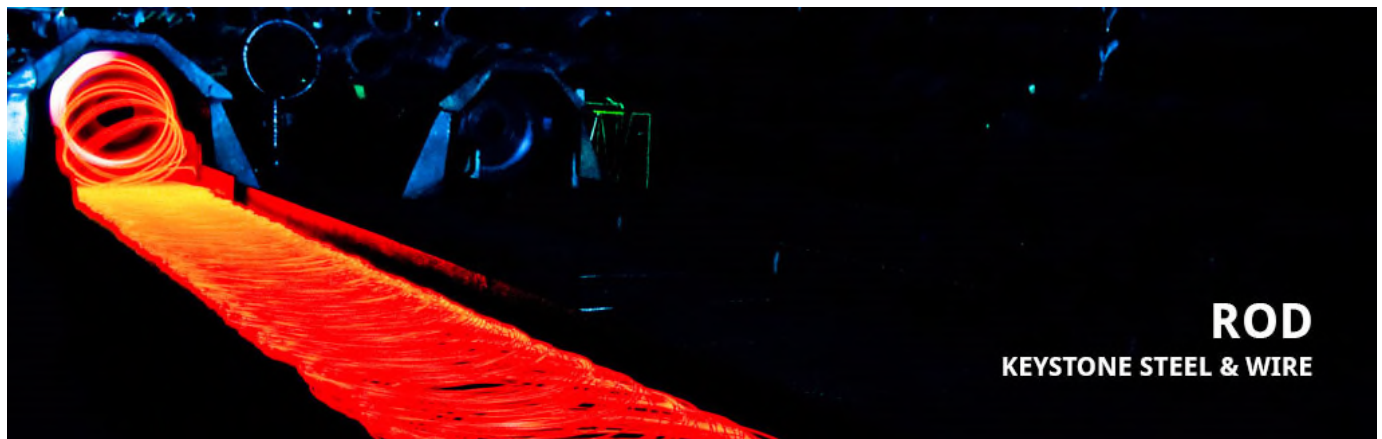
## PRODUCTS





Keystone's continuous billet caster uses state-of-the-art clean steel practices, yielding consistent, high-quality steel billets. Our large production capacity enables us to meet the volume demands of all our customers.

Contact Steve Ashby at [ashbyst@keystonesteel.com](mailto:ashbyst@keystonesteel.com) or 309.697.7416



Keystone's Rod Mill facility features a Morgan<sup>®</sup> No-Twist finishing mill for consistent rod quality. Retarded cooling provides system flexibility to meet variety of end product specifications. Rods are available for mechanical descaling or chemical cleaning.

[Product Specifications](#) | [Schedule](#) | Contact Steve Ashby at [ashbyst@keystonesteel.com](mailto:ashbyst@keystonesteel.com) or 309.697.7416





Keystone rebar products are produced with the same quality and consistency you've come to expect in Keystone steel. Our integrated steel mill allows continuous control from beginning to end, enabling KSW to produce the finest rebar products possible.

[Product Specifications](#) | Contact Steve Ashby at [ashbyst@keystonesteel.com](mailto:ashbyst@keystonesteel.com) or 309.697.7416



With 22 different drawing machines available for customer specifications, Keystone's extensive wire drawing capabilities make KSW a leader in the wire industry, with each product produced in accordance with applicable ASTM standards.

[Product Specifications](#) | Contact Tom Roschek at [roschetm@keystonesteel.com](mailto:roschetm@keystonesteel.com) or 309.697.7131



The only ag fence completely made in the U.S. from start to finish, Red Brand's use of high-quality materials and expert craftsmanship have earned Red Brand the reputation of 'the most respected name in farm fence.'

[redbrand.com](http://redbrand.com) | Contact us at [general@keystonesteel.com](mailto:general@keystonesteel.com) or 800.441.0308

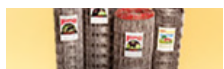
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**KEYSTONE CONSOLIDATED INDUSTRIES, INC.**

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OUR FAMILY OF FENCE  
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FIELD FENCE  
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SHEEP & GOAT FENCE  
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SPECIALTY APPLICATION  
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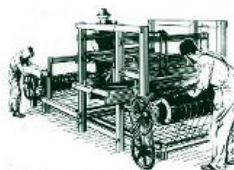
## Corporate Profile

Founded in 1889, the Keystone Steel & Wire Company began in a humble shed on a rented farm in Dillon, Illinois. Peter Sommer invented a machine that wove steel wire fence to replace traditional wooden timber fences. This invention made life easier for millions of American farmers, and spawned a midwestern steel giant.



Around 1925, the first "Red Brand" fence appeared. In a display of modern marketing savvy, a Keystone employee dipped the tops of Keystone wire and fence posts in red paint, making the new Red Brand® products instantly recognizable on farms all over America. Today, Keystone still tops off these products with a coat of red paint -- even the barbs on coils of barbed-wire.

In March, 1988, Keystone fired up its modernized Bartonville rod mill, thereby increasing Keystone's rod-making capacity by 50%. The expansion has enabled Keystone to strengthen its position as a rod and wire products supplier.



Keystone Steel & Wire Co.'s Bartonville, IL campus is one of the largest wire mills in the world with over 2,000,000 square feet of manufacturing space on over 1,000 acres. Last year, Keystone's 860 employees produced over 700,000 tons of steel.



Today, Keystone is proud to put its products and services online for you. We hope that the information you find in this web site is a helpful addition to the service Keystone provides. If you have comments or would like to see any other information added to this

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### CORPORATE & CAREERS

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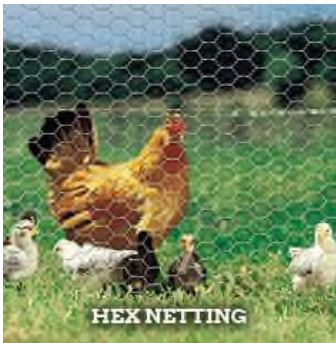
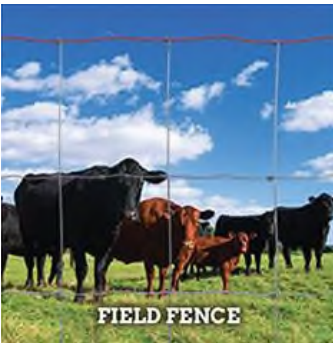
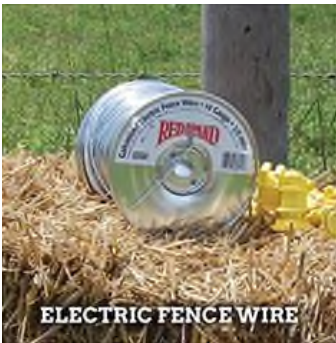
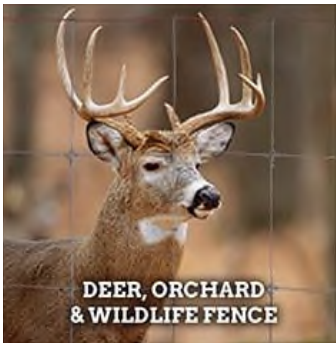
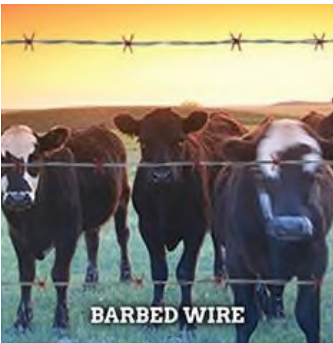
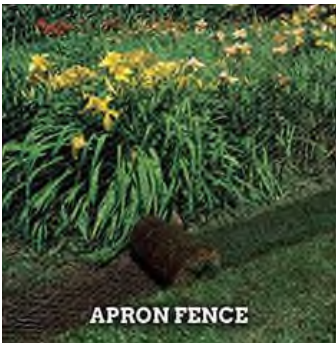
Shop by Roll Length

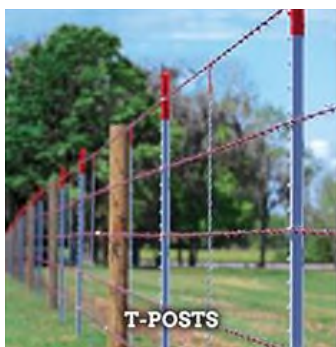
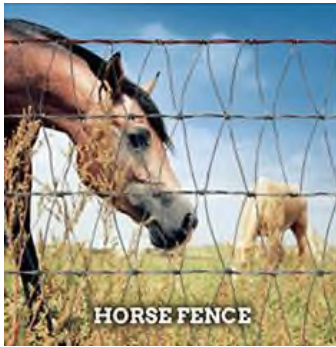
Shop by Spacing

All


Shop by Wire Type

All







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# **EXHIBIT 5**

## **EXCERPTS FROM NUCOR'S WEBSITE AND PRODUCT REFERENCE GUIDE**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
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**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017



**(\*\*)** [Nucor to Modernize Rolling Mill at its Ohio Bar Mill](#) >

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# NUCOR STEEL CONNECTICUT, INC.

Carbon steel reinforcing bar, wire rod, wire mesh fabrication, structural mesh fabrication, rolled wire, and deformed wire

## MAILING ADDRESS

P.O. Box 928  
Wallingford, Connecticut 06492

## ADDRESS

35 Toelles Road  
Wallingford, Connecticut 06492

PH 203.265.0615

FX 203.284.8125

## EXECUTIVES

Doug Adams, General Manager



.....  
[www.nucoraccount.com](http://www.nucoraccount.com)

DIVISION SITES >

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# WIRE PRODUCTS



## SUMMARY

## LOCATIONS

www.nucor.com

<b>NUCOR COLD FINISH &amp; WIRE PRODUCTS UTAH</b> 1875 West Highway 13 South Brigham City, UT 84302 Phone: 435-734-9334 Fax: 435-734-4581	<b>NUCOR-LMP, INC</b> 2000 East First Street Maryville, MO 64468 Phone: 660-582-3127 Fax: 660-582-7730	<b>LAUREL-LEC BRANTFORD</b> 84 Shaver Street Brantford, ON, Canada N3T 5S1 Phone: 519-759-2300 Fax: 519-759-1570
<b>NUCOR STEEL CONNECTICUT, INC</b> 35 Toelles Road Wallingford, CT 06492 Phone: 203-265-0615 Fax: 203-265-7676	<b>LAUREL STEEL BURLINGTON</b> 5400 Harvester Road Burlington, ON, Canada L7R 3Y8 Phone: 905-681-6811 Fax: 905-634-7888	

## PRODUCTS

### BRIGHT BASIC WIRE

Industrial or plating quality, made-to-order. Wire can be shipped as coil or straightened and cut. Our flexibility and extensive raw material inventory allow us to produce made-to-order wire with short lead times.

**S&C pencil rod** available in diameters from .125" through .500" in lengths from 2' through 24'.

**Coils** from .062" through .625" (see table below).

**Common grades** produced include: 1008, 1010, 1012, 1018, 1030, 1035 and 1045.

- Various package dimensions and processes are available — please inquire.
- Wire products can be chemically cleaned to achieve a consistently brighter, cleaner surface. Please see table below.
- Key markets for Bright Basic Wire include point-of-purchase displays, wire form fabricators, automotive, appliance, lawn and garden, and wire shelving.

BRIGHT BASIC WIRE	QUALITY	SIZE RANGE*	COMMON GRADES**								PACKAGE SIZE	
			1006	1008	1010	1012	1018	1030	1035	1045	STANDARD	AVAILABLE IN
NUCOR-LMP	IQ - Acid cleaned	.057" – .625"	-	•	•	•	•	•	•	•	2,000 lbs.	1,500 lbs. – 4,000 lbs.
	PQ - Acid cleaned											
LAUREL STEEL	IQ - Acid cleaned	.062" – .625"										
	PQ - Acid cleaned	.062" – .5"	-	•	•	•	•	•	•	•	2,000 lbs.	1,000 lbs. – 3,500 lbs.
	IQ - Mechanical	.375" – .625"										
LAUREL-LEC	IQ - Mechanical	.125" – .438"	•	•	•	•	-	-	-	-	2,000 lbs.	1,000 lbs. – 3,500 lbs.
	SQ - Mechanical (Rolled)	.160" – .505"									3,500 lbs.	1,000 lbs. – 4,500 lbs.
NUCOR STEEL CONNECTICUT	IQ - Mechanical	.134" – .628"	•	•	•	•	•	-	-	-	2,000 lbs.	1,500 lbs. – 5,000 lbs.
	SQ - Mechanical (Rolled)	.134" – .628"									2,000 lbs.	1,500 lbs. – 5,000 lbs.

\*Multiple sizes available. Please inquire for your specific size. \*\*Various AISI grades available. Please inquire for any grade not listed.

PRODUCTS *continued*

			SURFACE			DIMENSIONS RANGE									
WELDED WIRE MESH			Black	Galv	Epoxy		Thickness Line Wire		Thickness Cross Wire		Width		Length		
							Min	Max	Min	Max	Min	Max	Min	Max	
NUCOR STEEL CONNECTICUT	WWR	ROLLS	●	-	-	in	0.131"	0.226"	0.131"	0.226"	60"	60"	600"	1800"	Line wire 4", 6" Cross wire 4" up to 12"
			mm	3.32	5.74	3.32	5.74	1524	1524	15240	45720				
		SHEETS <sup>1</sup>	●	●	●	in	0.131"	0.315"	0.131"	0.315"	42"	144"	18"	480"	Line wire 4", 6", 8", 10", 12" Cross wire 4", 6", 8", 10", 12"
			mm	3.32	8.0	3.32	8.0	1067	3658	457	12192				
	SWWR	SHEETS <sup>2</sup>	●	●	●	in	0.226"	0.628"	0.19"	0.628"	32"	126"	96"	540"	Line wire 2" and then infinitely variable Cross wire 2" and then infinitely variable
			mm	5.74	15.95	4.88	15.95	813	3200	2438	13716				

<sup>1</sup>Under 60" width, the material needs to be sheared    <sup>2</sup>Maximum welded width (line wire to line wire) is 120"

LAUREL STEEL & LAUREL-LEC	WWR	ROLLS	●	●	-	in	0.131"	0.226"	0.131"	0.226"	24"	96"	600"	12000"	Line wire 3", 4", 6", 8", 10" Cross wire 2" and then multiples of 2" up to 16"
						mm	3.32	5.74	3.32	5.74	610	2438	15240	304800	
		SHEETS	●	●	●	in	0.131"	0.472"	0.131"	0.472"	30"	126"	48"	468"	Line wire 2" and then infinitely variable Cross wire 1" and then infinitely variable
						mm	3.32	12.0	3.32	12.0	762	3200	1219	11887	
		SHEETS	●	●	●	in	0.226"	0.472"	0.226"	0.472"	32"	126"	79"	468"	Line wire 2" and then multiples of 2" Cross wire 2" and then infinitely variable up to 39"
						mm	5.74	12.0	5.74	12.0	813	3200	2007	11887	
	MINE	SHEETS	●	●	●	in	0.131"	0.472"	0.131"	0.472"	30"	126"	48"	468"	Line wire 2" and then infinitely variable Cross wire 1" and then infinitely variable
						mm	3.32	12.0	3.32	12.0	762	3200	1219	11887	
	PIPE	ROLLS	●	●	-	in	0.148	0.229"	0.148"	0.229"	30"	96"	1200"	12000"	Line wire 3", 4", 6", 8", 10" Cross wire 2" and then multiples of 2" up to 16"
						mm	3.76	5.82	3.76	5.82	762	2438	30480	304800	

NUCOR COLD FINISH UTAH	MINE	SHEETS <sup>1</sup>	●	●	-	in	0.134"	0.315"	0.134"	0.315"	42"	96"	42"	257"	Line wire 2", 3", and multiples thereof Cross wire 2" up to 16" infinitely variable
						mm	3.4	8.0	3.4	8.0	1067	2438	1067	6528	
	WWR	SHEETS <sup>1</sup>	●	●	-	in	0.134"	0.315"	0.134"	0.315"	42"	96"	42"	257"	Line wire 2", 3", and multiples thereof Cross wire 2" up to 16" infinitely variable
						mm	3.4	8.0	3.4	8.0	1067	2438	1067	6528	
		ROLLS	●	-	-	in	0.131"	0.226"	0.131"	0.226"	48"	96"	600"	2400"	Line wire 4", 6", 12" Cross wire 4", 6", 12"
						mm	3.32	5.74	3.32	5.74	1219	2438	15240	60960	

<sup>1</sup>Flush-cut ends on SHEETS of welded wire mesh



## DRAWN TO STRENGTH

THE NUCOR WIRE PRODUCTS GROUP CAN PROVIDE MATERIAL THAT IS MELTED AND MANUFACTURED IN THE USA. ALL OF OUR MATERIAL IS MADE FROM THE HIGHEST-QUALITY STEEL AND CONFORMS TO ASTM STANDARDS. WE PROVIDE TO OUR CUSTOMERS A CERTIFIED MILL TEST REPORT WHICH CONFIRMS CHEMICAL AND PHYSICAL RESULTS. OPERATING FROM FIVE PLANT LOCATIONS, NUCOR IS ABLE TO PROVIDE A LARGE VARIETY OF WIRE PRODUCTS FROM COAST TO COAST THROUGH OUR NETWORK OF REBAR FABRICATORS, BUILDING SUPPLY DISTRIBUTORS, READY MIX PRODUCERS AND PRODUCERS OF PRECAST CONCRETE PRODUCTS. NUCOR CAN OFFER THE MOST COMPREHENSIVE CONCRETE REINFORCING STEEL PACKAGE FOR THE CONCRETE CONSTRUCTION INDUSTRY.







## STRUCTURAL WELDED WIRE REINFORCEMENT

Nucor Wire Products Group is a leading manufacturer of Structural Welded Wire Reinforcement (SWWR) in style and size of specialty custom sheet designs. Wire sizes in deformed (D) or smooth (W) wire ranges in size from D4.0 (diameter 0.225") to D31.0 (diameter 0.628"). Sheet sizes are custom for your requirements with widths from 1 foot to 10 feet 8 inches and lengths up to 45 feet. Epoxy and galvanized coatings are available. Nucor's SWWR products conform to all requirements of ASTM A1064/A1064M.

## PROCESS

SWWR is a custom prefabricated Welded Wire Reinforcement (WWR) sheet commonly used as concrete reinforcement throughout the construction industry due to its high product strength (80 KSI) and labor-saving values. Each wire intersection is electrically resistant and welded by a continuous automatic welder. Pressure and heat fuse the intersecting wires into a homogeneous section and fix all wires in their proper position. SWWR may be produced with (W) smooth wire or (D) deformed wire or a combination of both. It is made from high-strength steel Grade 80 with welded intersections. The properties of customary (A615) Grade 60 rebar do not allow this to be welded and limit the design strength to 60,000 psi.

## ADVANTAGES

The placing and tying of rebar is one of the most labor-intensive activities on a construction site and can often lead to errors when not properly supervised. SWWR is a cost-effective alternative to tied-in-place rebar, and has evolved into the premier method of effectively and efficiently reinforcing concrete structures. Due to its high strength, prefabricated SWWR can replace rebar sizes #3 to #7 and even larger rebar when specified by reducing the wire spacing. SWWR also has the support of ACI-318 as an equivalent to rebar. Designers and engineers are replacing rebar with SWWR for the following advantages over other types of reinforcement.

- Faster and quicker installation due to welded joints that eliminate the need to tie individual rebar together.
- Field inspections are quicker and faster because wires are machine spaced and welded precise. The placing of prefabricated sheet is faster than placing individual rebar.
- SWWR is lighter and designed to exact specifications so there is no over-steeling, yet it maintains strength.
- SWWR uses less steel and requires less labor, smaller crews and quicker placing time, leading to further economies in the construction cycle.
- Overall, SWWR, when compared to rebar, can be more cost effective depending upon the application or particular job.

## PRODUCT APPLICATIONS

SWWR is most often used for slab-on-grade reinforced concrete construction. Some examples include concrete wall configurations, precast tunnel form segments, cast-in-place tunnels, precast and cast-in-place retaining walls, sound walls, architectural walls and tilt-up walls. SWWR may also be used in precast concrete products such as prison cells, box culverts, traffic barriers, T and I beams, and segmental bridge sections. The future for SWWR lies in commercial and industrial buildings, sewage treatment plants, energy plants, tunneling, warehouses, stadiums, parking structures, airports and highways.

# WIRE PRODUCTS

## OUR STORY



### WELDED WIRE REINFORCEMENT

Nucor Wire Products Group is a leading manufacturer of Welded Wire Reinforcement (WWR) from Standard Building Mesh sheets and rolls to custom-designed Structural Mesh Sheets — both as an alternative to traditional rebar. Wire sizes may vary from 1/8" to 5/8" in diameter, and spacing may be set to achieve the cross-sectional steel area that is required. Standard roll dimensions are generally 5 feet wide and 50 to 150 feet in length. Standard flat sheets are generally 5 to 8 feet wide and 10 to 20 feet in length. Epoxy and galvanized coating are available. Sizes will vary from market to market. The use of WWR as a structural concrete reinforcement material is recognized by the American Concrete Institute (ACI-318).

### PROCESS

WWR is a prefabricated reinforcement consisting of parallel series of high-strength, cold-drawn wires welded together in square or rectangular grids. These wires are referred to as longitudinal (long wires) and transverse (cross/width wires). Each wire intersection is electrically resistant and welded by a continuous automatic welder. Pressure and heat fuse the intersecting wires into a homogeneous section and fix all wires in their proper position. The wires are produced from quality hot-rolled, low-carbon steel rods which are then cold-rolled or cold-drawn through a series of dies, reducing the rod to the specified wire diameter. Through the cold working of the steel rod, the mechanical properties are changed, increasing the stiffness, hardness, and tensile strength, while reducing the ductility of the material. The wire is then fed into a large automatic welding machine which produces the rigid grid of reinforcement. The manufacturing process may vary to accommodate various style changes and dimensions.

### WHEN ORDERING WWR SHEETS OR ROLLS

**WIRE SIZES** The size of the wire is provided as a W or D number. W will mean smooth wire and D will denote deformed wire. The number which follows the letter is the area of the wire in hundredths of a square inch. For example, D19.8 would indicate a deformed wire with a cross sectional area of 0.198 square inches while a W11.7 would indicate a smooth wire with a cross-sectional area of 0.117 square inches. Note: Wire can be drawn to exact steel areas required, which eliminates over-steeling and excessive costs.

**STYLE** These are the spaces and sizes of wire in the standard welded wire reinforcement. An example of this designation is 6" x 12" D14.0 x D6.0. This denotes a WWR in which spacing of the longitudinal wires = 6", spacing of the transverse wires = 12", size of deformed longitudinal wires = D14.0 (0.140 square inches), and size of deformed transverse wires = D6.0 (0.060 square inches).

### PRODUCT APPLICATIONS

WWR can be used in residential, commercial and light industrial concrete construction applications. These can vary from slab on grade, supported floor slabs, walls, tilt-up walls, sidewalks and parking lots.

**DIMENSIONS** These are linear measurements other than the wire spacing included in the style designation and are as follows:

- **WIDTH** This is the center-to-center distance between outside longitudinal wires.
- **SIDE OVERHANGS** This is the extension of the transverse wires beyond the centerline of the outside longitudinal wires. When specific lengths of side overhang are required, the length will be provided in inches. For example, (+2", +10") means 2" overhang one side and 10" overhang opposite side.
- **OVERALL WIDTH** This is the width plus side overhangs. This is the tip-to-tip measurement of the transverse wire. For example, 84" (+2", +10") = 96" overall.
- **END OVERHANGS** These are the extensions of the longitudinal wires beyond the centerline of the outside transverse wires. Standard end overhangs are equal to half the transverse wire spacing. Unless otherwise specified, standard end overhangs will be supplied.



## SPECIALIZED WIRE PRODUCTS

### PRODUCT APPLICATIONS

Suitable for use in agricultural, residential and mine roof support where corrosion is a concern.

### MARKETS

Pre-casters, Mining Supply Distribution Centers, Building Product Distributors, Contractors and End Users.

### FABRICATED FORMED WIRE PRODUCTS

Sold directly to concrete pipe and precast concrete manufacturers and through distributors. Offered as circular and rectangular hoops W1.7 (0.148") to D12 (0.391") up to 72" diameter to reinforce concrete manholes and risers. Spacers and other shapes available.

### ANCHOR BOLTS

Sold through building supply distributors. Offered in 1/2" x 6", 8", 10" and 12" L-shaped or Pig Tail Anchor Bolts. Sold with nuts and washers for use in residential and light commercial construction. Custom and larger bolt sizes are run to order.

### FORM STAKES

Form stakes are used to position concrete formwork such as concrete sidewalks, curbs and slabs. Form stakes are sold through building supply distributors. Form stakes, also known as curb stakes, nail stakes or curb pins, are produced in a standard 3/4" diameter x 12", 18", 24", 30", 36", 42" and 48" lengths. Offered with nail holes or run-to-order without nail holes in 3/4", 7/8" or 1" diameters.



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## **EXHIBIT 6**

### EXCERPTS FROM CHARTER STEEL'S WEBSITE

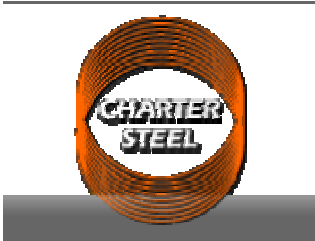
BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
**AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017





800.437.8789 | 10000

[Home](#) [About Our Company](#) [Why Charter?](#) [Products & Capabilities](#) [Contact Us](#)

Products & Capabilities

Steelmaking

Bar & Rod Rolling

Coil Processing

Final Inspection

Products & Capabilities

Charter Steel is a fully integrated, American manufacturer of special bar quality (SBQ) bar, rod & wire products. With an annual coil-making capacity of approximately 1.2 million tons, we produce SBQ rod and bar ranging in sizes from 7/32 inches (5.5 mm) to 1-9/16" (39.7 mm) in diameter.

Our strict quality and process control standards have made us an industry leader in the supply of bar, rod and wire with optimal mechanical characteristics and minimal variation.

A one-stop shop for fully processed steel coils, Charter Steel serves as an integrated supply chain partner offering flexibility, service and reliable on-time delivery.



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Products & Capabilities

Steelmaking

Bar & Rod Rolling

Coil Processing

Final Inspection

## Products & Capabilities /

### Coil Processing

Charter Steel's state-of-the-art processing plants clean, coat, anneal and draw steel to a customer's specifications. Charter Steel can provide on-time deliveries of fresh processed product from our fully integrated mill.

Before being processed, the steel rod is cleaned and coated. Charter Steel utilizes either sulfuric or hydrochloric acid cleaning and has mechanical descaling (shotblasting) capability.

Charter Steel offers several coatings for its processed products, including:

- Lime coating
- Reactive lube
- Zinc Phosphate
- Polymer coatings
- Combination coatings

Charter Steel utilizes box-type, short-time-cycle (STC) and continuous annealing furnaces. The temperature within each furnace is continuously monitored and controlled to produce the exact steel properties specified by our customers. Nitrogen and endothermic gas annealing atmospheres are available.

Charter Steel offers several annealing cycles, including:

- Spheroidization anneals for improved formability
- "Regular" and "stress relief" anneals that soften the material without altering the microstructure
- Lamellar pearlite (LP) anneals for improved machineability



### Coiled Bar, Rod & Wire Products

Charter Steel can process all carbon and alloy grades, leaded grades are provided as hot rolled only.

Charter Steel produces a variety of wire in sizes ranging from 0.140" to 1.439." The maximum finish size depends on the start size and processes involved.

Charter Steel's wire-drawing operation is capable of producing:

- Excellent dimensional tolerances with minimum tensile strength (SAFS wire)
- Cold-forming product with minimal tensile strength (SAIP wire)
- Wire with carefully targeted tensile strength (DFSAR wire)
- Eddy Current inspected wire



GLOBAL LEADER  
IN COLD-ROLLING  
TECHNOLOGY  
SINCE 1936



### A History of Exceptional Performance

Founded in 1936 in Milwaukee, Wisconsin, Charter Wire has grown from an early pioneer in cold-rolling technology into a global leader. Today, Charter Wire is a major supplier of precision wire products to manufacturers around the world. Our standard shapes and custom profiles are integral components in thousands of manufactured products.

Charter Wire is a member of the privately held Charter Manufacturing family of companies. Every business within Charter puts a premium on:

- Creating value for customers by exceeding their expectations
- Empowering and engaging employees
- Continuously improving safety, quality and efficiencies
- Realizing sustained growth via breakthrough strategies

## THE IDEAL PARTNER FOR YOUR BUSINESS

### Integrated Supply Chain

Charter Wire purchases the vast majority of its raw material from its sister division, Charter Steel. Charter Steel is a leading provider of special bar quality (SBO) bar, rod and wire for highly engineered products, including bearing, cold heading, cold finishing and high carbon applications. The company has over one million tons of electric arc furnace melt and hot-roll capacity between its Saukville, Wisconsin, and Cleveland, Ohio, mills. Charter Steel's innovative supply chain practices, combined with state-of-the-art processing facilities for annealing, cleaning and coating, and drawing, result in exceptional service capabilities.

Thanks to this vertical integration, Charter Wire is able to offer its customers unmatched efficiency, quality, technical support and service reliability. Charter Wire offers the industry's shortest lead times, world-class on-time delivery, maximum material yields and virtually no risk of service interruption.

Our technical expertise in melting, hot-rolling and cold-rolling processes throughout the supply chain – combined with superior levels of service and efficiency – make Charter the ideal supply partner for any cold-rolled application.





# THE CHARTER WIRE ADVANTAGE

## Reliability When Precision Counts

Charter Wire serves a full spectrum of markets and applications that demand safety-critical, precision engineering.

- Aerospace
- Agriculture
- Automotive
- Construction/Architectural
- Consumer Products
- Electronics
- Energy
- Industrial

## From Concept Through Completion

Charter Wire has the experience and understanding to assist you at every step of your product development. Our engineers can help you design a near net shape that can minimize secondary machining operations and improve yield.

- Raw material selection
- Engineering, design and CAD support
- In-house laboratory testing and evaluation
- PPAP and other quality documentation

## World-Class Quality,

### Cost-Effective Production

In 2010, Charter Wire completed our relocation to a newly built, state-of-the-art manufacturing facility in Milwaukee, Wisconsin. With more than 160,000 square feet (15,000 square meters) of production space and improved material flow, both capacity and efficiency have been increased.

- Automated 12-stand cold-rolling lines
- In-line raw material preparation (sanding and shot blasting)
- Continuous raw material payoff
- Dedicated, high-volume coolant systems
- Dual zone nitrogen/hydrogen annealing furnace

## Unmatched Technical Capability

Charter Wire has developed more than 2,000 custom shapes since our inception in 1936. Our quality comes from in-depth engineering and tool-making capability, much of which is proprietary.

- In-house tool design and fabrication
- Tailored mechanical properties for custom applications
- Ability to hold tolerance to 0.002" (0.05 mm)

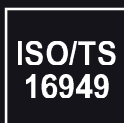




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**We're made of  
the best material.**



## MEETING THE WORLD'S MOST EXACTING STANDARDS

Charter Wire takes precision manufacturing to the highest level. With our exclusive cold-rolling process, custom shapes can be engineered with the materials, grades, tempers and tolerances for your specific requirements.

### MATERIALS

Carbon steel  
Alloys  
Stainless steel  
Copper  
Other non-ferrous metals

### TYPICAL TOLERANCES

Thickness:  $\pm 0.001"$  (0.025 mm)  
Width:  $\pm 0.0015"$  (0.038 mm)  
Straightened & cut lengths:  
 $\pm 0.250"$  (6.35 mm)

### EDGE PROFILES

#1 Special Prepared Edge  
#4 Natural Round Edge  
#6 Square Edge

### FINISHES

All industry finishes

### TEMPERS

#1 Full Hard  
#5 Dead Soft  
Custom tempers available

### COLD-ROLLED SPECIAL SHAPES

Thickness:  $0.025" - 1.000"$   
(0.64 mm – 25.0 mm)  
Width:  $0.187" - 1.928"$   
(4.75 mm – 49.0 mm)

### COLD-FINISHED BARS

[Squares, Rectangles, Flats]  
Thickness:  $0.125" - 1.000"$   
(3.0 mm – 25.0 mm)  
Width:  $0.125" - 1.938"$   
(3.0 mm – 49.0 mm)

### PACKAGING

Oscillate-wound coils  
Uniform bundles  
Boxed components  
Returnable containers  
Special requirements accommodated

### QUALITY ASSURANCE

ISO/TS 16949 certified  
In-line NDT (eddy current)

### EXPORT CAPABILITIES

Containers to 44,000 lbs. (20,000 kg)

This Public Exhibit Does Not Contain Confidential Business Information.

## EXHIBIT 7

### PRICE INCREASE ANNOUNCEMENTS BY DOMESTIC ROD MILLS

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION

APRIL 24, 2017

PRICE INCREASE ANNOUNCEMENTS  
BY  
DOMESTIC ROD MILLS

2016—MARCH 2017

MILL	DATE	ANNOUNCED INCREASE	EFFECTIVE DATE
GERDAU	January 13, 2016	\$30/ton on all rod products	February 1, 2016
	March 9, 2016	\$20/ton on all rod products	April 1, 2016
	April 8, 2016	\$50/ton on all rod products	May 1, 2016
	May 9, 2016	\$40/ton on all rod products	June 1, 2016
	November 14, 2016	\$40/ton on all rod products	December 1, 2016
	December 14, 2016	\$45/ton on all rod products	January 1, 2017
	January 10, 2017	\$45/ton on all rod products	February 1, 2017
	February 16, 2017	No change in price	March 1, 2017
	March 13, 2017	\$45/ton on low carbon; \$60/ton high carbon	April 1, 2017
	April 11, 2017	No change in price	May 1, 2017
KEYSTONE	January 14, 2016	\$30/ton on all rod products	February 1, 2016
	March 10, 2016	\$20/ton on all rod products	April 1, 2016
	April 11, 2016	\$50/ton on all rod products	May 1, 2016
	May 11, 2016	\$30/ton on all rod products	June 1, 2016
	November 15, 2016	\$40/ton on all rod products	December 1, 2016
	December 14, 2016	\$45/ton on all rod products	January 1, 2017
	January 11, 2017	\$45/ton on all rod products	February 1, 2017
	February 16, 2017	No change in price	March 1, 2017
	March 8, 2017	\$45/ton on low carbon; \$60/ton high carbon	April 1, 2017
	April 16, 2017	No change in price	May 1, 2017
NUCOR —ARIZONA	January 11, 2016	\$30/ton on all rod products	February 1, 2016
	March 9 2016	\$20/ton on all rod products	April 1, 2016
	April 8, 2016	\$50/ton on all rod products	May 1, 2016
	May 10, 2016	\$20/ton on low carbon; \$30/ton on high carbon	June 1, 2016
	November 10, 2016	\$40/ton on all rod products	December 1, 2016
	December 12, 2016	\$45/ton on all rod products	January 1, 2017
	January 10, 2017	\$45/ton on all rod products	February 1, 2017
	February 10, 2017	No change in price	March 1, 2017
	March 8, 2017	\$20/ton on all rod products	April 1, 2017
	April 6, 2017	No change in price	May 1, 2017



**PRICE INCREASE ANNOUNCEMENTS BY DOMESTIC ROD MILLS  
2016—MARCH 2017**

APRIL 2017

PAGE 2

<b>MILL</b>	<b>DATE</b>	<b>ANNOUNCED INCREASE</b>	<b>EFFECTIVE DATE</b>
<b>NUCOR — CONNECTICUT</b>	March 9 2016	\$20/ton on all rod products	April 1, 2016
	April 11, 2016	\$50/ton on all rod products	May 1, 2016
	May 10, 2016	\$20/ton on low carbon; \$30/ton on high carbon	June 1, 2016
	November 10, 2016	\$40/ton on all rod products	December 1, 2016
	December 12, 2016	\$45/ton on all rod products	January 1, 2017
	January 10, 2017	\$45/ton on all rod products	February 1, 2017
	February 10, 2017	No change in price	March 1, 2017
	March 10, 2017	\$45/ton on low carbon; \$60/ton high carbon	April 1, 2017
	April 6, 2017	No change in price	May 1, 2017
<b>NUCOR —NEBRASKA</b>	January 11, 2016	\$30/ton on all rod products	February 1, 2016
	March 7 2016	\$20/ton on all rod products	April 1, 2016
	April 11, 2016	\$50/ton on all rod products	May 1, 2016
	May 10, 2016	\$20/ton on low carbon; \$30/ton on high carbon	June 1, 2016
	November 10, 2016	\$40/ton on all rod products	December 1, 2016
	December 12, 2016	\$45/ton on all rod products	January 1, 2017
	January 10, 2017	\$45/ton on all rod products	February 1, 2017
	February 10, 2017	No change in price	March 1, 2017
	March 14, 2017	\$45/ton on low carbon; \$60/ton high carbon	April 1, 2017
	April 6, 2017	No change in price	May 1, 2017
<b>NUCOR — SOUTH CAROLINA</b>	January 11, 2016	\$30/ton on all rod products	February 1, 2016
	March 9 2016	\$20/ton on all rod products	April 1, 2016
	April 11, 2016	\$50/ton on all rod products	May 1, 2016
	May 10, 2016	\$20/ton on low carbon; \$30/ton on high carbon	June 1, 2016
	November 10, 2016	\$40/ton on all rod products	December 1, 2016
	December 12, 2016	\$45/ton on all rod products	January 1, 2017
	January 10, 2017	\$45/ton on all rod products	February 1, 2017
	February 10, 2017	No change in price	March 1, 2017
	March 14, 2017	\$45/ton on low carbon; \$60/ton high carbon	April 1, 2017
	April 6, 2017	No change in price	May 1, 2017

**PRICE INCREASE LETTERS  
FROM  
GERDAU LONG STEEL NORTH AMERICA**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Gerdau:

April 11, 2017

March 13, 2017

February 16, 2017 (maintain level price)

January 10, 2017

December 14, 2016

November 14, 2016

May 9, 2016

April 8, 2016

March 9, 2016

January 13, 2016



April 11, 2017

Dear Valued Customer:

Gerdau will extend its April 2017 transactional prices for Wire Rod into May.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our policy as needed.

Gerdau values your business and we appreciate your continued support. If you have any questions, please contact your Regional Sales Representative.

Sincerely,

A handwritten signature in cursive script that reads 'Rick Szink'.

Rick Szink

Director of Sales - SBQ, Specials, and Wire Rod  
North America

Gerdau 4221 W. Boy Scout Blvd. Tampa, FL 33607



March 13, 2017

Dear Valued Customer:

Effective with shipments April 1, 2017, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$45/ton (\$2.25/cwt)** on **LC Rod** and **\$60/ton (\$3.00/cwt)** on **HC Rod**.

The markets we serve are improving and the input costs to produce your products are rising. Gerdau ensures you, our partner, we will keep you informed of changes taking place in the marketplace.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in cursive script that reads 'Rick Szink'.

Rick Szink  
Director of Sales – Wire Rod, SBQ, and Specials



February 16, 2017

Dear Valued Customer:

Gerda will extend its February 2017 Wire Rod prices into March for transactional shipments.

We will continue to monitor the market to ensure Gerda and its partners are on a competitive playing field and reserve the right to make adjustments to our policy as needed.

Gerda values your business and we appreciate your continued support. If you have any questions, please contact your Regional Sales Representative.

Sincerely,

A handwritten signature in black ink that reads 'Rick Szink'.

Rick Szink

Director of SBQ, Specials, and Wire Rod – North America



January 10<sup>th</sup>, 2017

Dear Valued Customer:

Effective February 1<sup>st</sup>, 2017, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$2.25/cwt (\$45 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marcelo Canosa'.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod



December 14<sup>th</sup>, 2016

Dear Valued Customer:

Effective January 1<sup>st</sup>, 2017, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$2.25/cwt (\$45 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marcelo Canosa'.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod





November 14<sup>th</sup>, 2016

Dear Valued Customer:

Effective December 1<sup>st</sup>, 2016, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$2.00/cwt (\$40 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marcelo Canosa'.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod



May 9<sup>th</sup>, 2016

Dear Valued Customer:

Effective June 1<sup>st</sup>, 2016, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products by \$2.00/cwt (\$40 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Marcelo Canosa'.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod



April 8<sup>th</sup>, 2016

Dear Valued Customer:

Effective May 1<sup>st</sup>, 2016, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$2.50/cwt (\$50 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marcelo Canosa', with a stylized flourish at the end.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod

March 9<sup>th</sup>, 2016

Dear Valued Customer:

Effective April 1<sup>st</sup>, 2016, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products** by **\$1.00/cwt (\$20 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Respectfully,



Marcelo Canosa  
Commercial Director ~ Rebar and Wire Rod



January 13<sup>th</sup>, 2015

Dear Valued Customer:

Effective February 1<sup>st</sup>, 2016, Gerdau Long Steel North America will be increasing the transactional price of **Wire Rod Products by \$1.50/cwt (\$30 per net ton)**.

We will continue to monitor the market to ensure Gerdau and its partners are on a competitive playing field and reserve the right to make adjustments to our pricing policy as needed.

If you have any questions, please contact your Gerdau Long Steel North America representative or call our Sales Office at 1-800-237-0230. We appreciate your continued support and look forward to satisfying your future steel requirements.

Respectfully,

A handwritten signature in black ink, appearing to read 'Marcelo Canosa'.

Marcelo Canosa  
Commercial Director – Rebar and Wire Rod

PUBLIC DOCUMENT

**PRICE INCREASE LETTERS  
FROM  
KEYSTONE STEEL & WIRE**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Keystone Steel & Wire:

April 6, 2017 (maintain level price)

March 8, 2017

February 16, 2017

January 11, 2017

December 14, 2016

November 15, 2016

May 11, 2016

April 11, 2016

March 10, 2016

January 14, 2016

**Keystone**



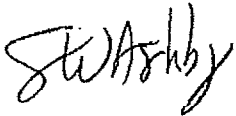
**Steel & Wire**

April 6, 2017

To our valued customers:

Keystone Steel will be extending its April transactional rod prices into May.

We will continually monitor the rod market to ensure our customers are priced competitively. We appreciate your support and look forward to supplying your steel requirements. If you have any questions, please contact your Keystone sales representative.



Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales  
Keystone Steel & Wire



**Keystone**



**Steel & Wire**

March 8, 2017

To our valued customers:

Effective with shipments starting April 3, 2017, Keystone Steel & Wire will be implementing a **\$45/ton (\$2.25/cwt.) increase on LC Wire Rod and \$60 (\$3.00/cwt.) on HC Wire Rod.**

Market conditions continue to improve in 2017 and raw material costs to produce these products are increasing back to higher sustainable levels. Contract business will be reviewed independently with your Keystone Sales representative.

As always, we at Keystone Steel & Wire appreciate your support and look forward to continuing our mutually beneficial relationship.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Ashby'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales

**Keystone**



**Steel & Wire**

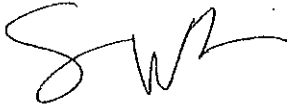
February 16, 2017

To our valued customers:

Keystone Steel will be extending its February transactional rod prices into March.

We will continually monitor the rod market to ensure our customers are priced competitively. We appreciate your support and look forward to supplying your steel requirements. If you have any questions, please contact your Keystone sales representative.

Sincerely,



Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales  
Keystone Steel & Wire

**Keystone**



**Steel & Wire**

January 11, 2017

To our valued customers:

Effective with shipments starting February 1 2017, we will be implementing a \$45/ton (\$2.25/cwt) increase on all **Wire Rod Products**.

If you have any questions, please contact your Keystone sales representative. We appreciate your support and look forward to supplying your steel requirements.

Sincerely,

Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales

**Keystone**



**Steel & Wire**

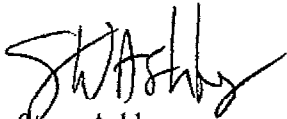
December 14, 2016

To our valued customers:

Effective with shipments starting January 1, 2017, we will be implementing a \$45/ton (\$2.25/cwt) increase on **all Wire Rod Products**.

If you have any questions, please contact your Keystone sales representative. We appreciate your support and look forward to supplying your steel requirements.

Sincerely,



Steve Ashby

Vice president, Rod, Rebar and Industrial Wire Sales

**Keystone**



**Steel & Wire**

November 15, 2016

To our valued customers:

Effective with shipments starting December 1, 2016, we will be implementing a \$40/ton (\$2.00/cwt) increase on **all Wire Rod Products**.

If you have any questions, please contact your Keystone sales representative. We appreciate your support and look forward to supplying your steel requirements.

Sincerely,



Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales

**Keystone**



**Steel & Wire**

May 11, 2016

To our valued customers:

Effective with shipments starting June 1, 2016, we will be implementing a \$30/ton (\$1.50/cwt) increase on **all Wire Rod Products**.

If you have any questions, please contact your Keystone sales representative. We appreciate your support and look forward to supplying your steel requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Ashby', with a stylized flourish at the end.

Steve Ashby  
Vice president, Rod, Rebar and Industrial Wire Sales

**Keystone**



**Steel & Wire**

April 11, 2016

To our valued customers:

Effective with shipments May 1, 2016, Keystone Steel & Wire will increase the base price on all wire rod products by \$50/ton. Raw material costs are rising, and look to be sustainable for the near term.

We at Keystone appreciate your support and look forward to continuing our mutually beneficial relationship. If you have any questions, please contact your Keystone sales representative.

Sincerely,

Steve Ashby  
Vice President  
Rod, Rebar, and Industrial Wire

**Keystone**



**Steel & Wire**

March 10, 2016

To our valued customers:

Effective with shipments April 1, 2016, Keystone Steel & Wire will increase the base price on all wire rod products by \$20/ton. Raw material costs are rising, and look to be sustainable for the near term.

Additionally, effective with shipments beginning April 25<sup>th</sup>, we will also increase the base price on all industrial wire products by \$40/ton.

We at Keystone appreciate your support and look forward to continuing our mutually beneficial relationship. If you have any questions, please contact your Keystone sales representative.

Sincerely,

A handwritten signature in black ink, appearing to read 'Steve Ashby'. The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Steve Ashby  
Vice President  
Rod, Rebar, and Industrial Wire



**Keystone**



**Steel & Wire**

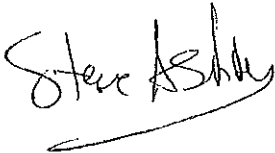
January 14, 2016

To our valued customers:

Effective with shipments starting February 1, 2016, Keystone Steel and Wire will be implementing a \$30/ton increase on all wire rod shipments.

If you have any questions regarding your pricing, please contact your sales representative. We appreciate your support and look forward to continuing our mutually beneficial relationship.

Sincerely,



Steve Ashby  
Vice President -- Wire, Rod, and Rebar Sales

PUBLIC DOCUMENT

**PRICE INCREASE LETTERS  
FROM  
NUCOR STEEL KINGMAN LLC (ARIZONA)**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Nucor Arizona:

April 6, 2017 (maintain price level)

March 9, 2017

February 10, 2017

January 10, 2017

December 12, 2016

November 10, 2016

April 8, 2016

March 9, 2016

January 11, 2016

April 6, 2017

Dear Valued Customer:

Effective with shipments May 1, 2017, Nucor will maintain (rolling over from April) our current transactional prices on all wire rod shipments.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (855) 718-7836.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

# **NUCOR**

***NUCOR STEEL KINGMAN, LLC***

March 9, 2016

Dear Valued Customer:

Effective with shipments April 1, 2016, Nucor Steel - Kingman will Increase all Wire Rod Products by \$20.00 per Ton (\$1.00/cwt)

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0222.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

February 10, 2017

Dear Valued Customer:

Effective with shipments March 1, 2017, Nucor Steel - Kingman will be extending our current February 2017 pricing for transactional Wire Rod shipments. This pricing will remain in effect until further notice.

If you have any questions, please contact your District Sales Manager or the mill direct at (855) 718-7836.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

January 10, 2017

Dear Valued Customer:

Effective with shipments February 1, 2017, Nucor Steel - Kingman will increase all Wire Rod products by \$45.00/ton.

As always, we will monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (855) 718-7836.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

December 12, 2016

Dear Valued Customer:

Effective with shipments January 1, 2017, Nucor Steel - Kingman will increase all Wire Rod products by \$45.00/ton.

As always, we will monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0022.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager



**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

November 10, 2016

Dear Valued Customer:

Effective with shipments December 1, 2016, Nucor Steel – Kingman will increase Wire Rod products by \$40.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0022.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

May 10, 2016

Dear Valued Customer:

Effective with shipments June 1, 2016, Nucor Steel – Kingman will increase Wire Rod products as noted below:

Low Carbon: Grades 1026 and lower	Increase of \$20/Ton
High Carbon: Grades 1030 and higher	Increase of \$30/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0022.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

# **NUCOR**

***NUCOR STEEL KINGMAN, LLC***

April 8, 2016

Dear Valued Customer:

Effective with shipments May 1, 2016, Nucor Steel - Kingman will Increase all Wire Rod Products by \$50.00 per Ton (\$2.50/cwt)

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0222.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

March 9, 2016

Dear Valued Customer:

Effective with shipments April 1, 2016, Nucor Steel - Kingman will Increase all Wire Rod Products by \$20.00 per Ton (\$1.00/cwt)

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0222.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

**NUCOR**  
**NUCOR STEEL KINGMAN, LLC**

January 11, 2016

Dear Valued Customer:

Effective with shipments February 1, 2016, Nucor Steel - Kingman will Increase all Wire Rod Products by \$30.00 per Ton (\$1.50/cwt)

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 778-0222.

Nucor Steel – Kingman thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Dave Olmsted  
Sales Manager

PUBLIC DOCUMENT

**PRICE INCREASE LETTERS  
FROM  
NUCOR ENGINEERED BAR GROUP (CONNECTICUT)**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Nucor Connecticut:

April 6, 2017 (maintain level price)

March 10, 2017

February 10, 2017

January 10, 2017

December 12, 2016

November 10, 2016

May 10, 2016

April 11, 2016

March 9, 2016

April 6, 2017

Dear Valued Customer:

Effective with shipments May 1, 2017, Nucor will maintain (rolling over from April) our current transactional prices on all wire rod shipments.

As always, we will continue to monitor the marketplace and respond accordingly to assure you of receiving a competitively priced product.

Sincerely,



Caleb Strother  
Sales Manager  
Nucor Steel Connecticut



March 10, 2017

Dear Valued Customer:

Effective with shipments April 1, 2017, Nucor Steel - CT will increase Wire Rod products by:

Low Carbon: Grades 1026 and lower	Increase of \$45/Ton
High Carbon: Grades 1030 and higher	Increase of \$60/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Caleb Strother  
Sales Manager  
Nucor Steel Connecticut

February 10, 2017

Dear Valued Customer:

Effective with shipments March 1, 2017, Nucor Steel - CT will be extending our current February 2017 pricing for transactional Wire Rod shipments. This pricing will remain in effect until further notice.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel Connecticut

**NUCOR®**  
**ENGINEERED BAR GROUP**

CONNECTICUT DIVISION

January 10, 2017

Dear Valued Customer:

Effective with shipments February 1, 2017, Nucor Steel - CT will increase all Wire Rod products by \$45.00/ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel Connecticut

December 12, 2016

Dear Valued Customer:

Effective with shipments January 1, 2017, Nucor Steel - CT will increase all Wire Rod products by \$45.00/ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel Connecticut

**NUCOR®**  
**ENGINEERED BAR GROUP**  
CONNECTICUT DIVISION

November 10, 2016

Dear Valued Customer:

Effective with shipments December 1, 2016, Nucor Steel - CT will increase all Wire Rod products by \$40.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel Connecticut



**BAR MILL GROUP**

CONNECTICUT DIVISION

May 10, 2016

Dear Valued Customer:

Effective with shipments June 1, 2016, Nucor Steel - CT will increase Wire Rod products as noted below:

Low Carbon: Grades 1026 and lower  
High Carbon: Grades 1030 and higher

Increase of \$20/Ton  
Increase of \$30/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,

Brett Stoler  
Sales Manager  
Nucor Steel Connecticut



**BAR MILL GROUP**

CONNECTICUT DIVISION

April 11, 2016

Dear Valued Customer:

Effective with shipments May 1, 2016, Nucor Steel - CT will increase all Wire Rod products by \$50.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,

A handwritten signature in black ink, appearing to read "Brett". The signature is stylized with a cursive-like flow.

Brett Stoler  
Sales Manager  
Nucor Steel Connecticut

**NUCOR**

**BAR MILL GROUP**

CONNECTICUT DIVISION

March 9, 2016

Dear Valued Customer:

Effective with shipments April 1, 2016, Nucor Steel - CT will increase all Wire Rod products by \$20.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 221-0323.

Nucor Steel – CT thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel Connecticut



PUBLIC DOCUMENT

**PRICE INCREASE LETTERS  
FROM  
NUCOR ENGINEERED BAR GROUP (NEBRASKA)**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Nucor Nebraska:

April 6, 2017 (maintain level price)

March 14, 2017

February 10, 2017

January 10, 2017

December 12, 2016

November 10, 2016

May 10, 2016

May 1, 2016

March 7, 2016

January 11, 2016

April 6, 2017

Dear Valued Customer:

Effective with shipments May 1, 2017, Nucor will maintain (rolling over from April) our current transactional prices on all wire rod shipments.

As always, we will continue to monitor the marketplace and respond accordingly to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton  
Sales Manager  
Nucor – NE

March 14th, 2017

Dear Valued Customer:

Effective with shipments April 1, 2017, Nucor Steel - NE will increase Wire Rod products by:

Low Carbon: Grades 1026 and lower	Increase of \$45/Ton
High Carbon: Grades 1030 and higher	Increase of \$60/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton  
Sales Manager  
Nucor – NE

February 10, 2017

Dear Valued Customer:

Effective with shipments March 1, 2017, Nucor Steel - NE will be extending our current February 2017 pricing for transactional Wire Rod shipments. This pricing will remain in effect until further notice.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174. Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton  
Sales Manager Nucor Steel - NE

January 10, 2017

Dear Valued Customer:

Effective with shipments February 1, 2017, Nucor Steel - NE will increase all Wire Rod products by \$45.00/ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.



Rob Colton  
Sales Manager Nucor Steel - NE

December 12, 2016

Dear Valued Customer:

Effective with shipments January 1, 2017, Nucor Steel - NE will increase all Wire Rod products by \$45.00/ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.



Rob Colton  
Sales Manager Nucor Steel - NE

November 10, 2016

Dear Valued Customer:

Effective with shipments December 1, 2016, Nucor Steel - NE will increase all Wire Rod products by \$40.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.



Rob Colton  
Sales Manager  
Nucor – NE



**NUCOR**  
**BAR MILL GROUP**  
NORFOLK DIVISION

May 10, 2016

Dear Valued Customer:

Effective with shipments June 1, 2016, Nucor Steel - NE will increase Wire Rod products as noted below:

Low Carbon: Grades 1026 and lower  
High Carbon: Grades 1030 and higher

Increase of \$20/Ton  
Increase of \$30/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton

**NUCOR**  
**BAR MILL GROUP**  
NORFOLK DIVISION

Dear Valued Customer:

Effective with shipments May 1, 2016, Nucor Steel - NE will increase all Wire Rod products by \$50.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel - NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton  
Sales Manager

March 7, 2016

Dear Valued Customer:

Effective with shipments April 1, 2016, Nucor Steel - NE will increase all Wire Rod products by \$20.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8173.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Rob Colton  
Sales Manager – NS-NE

**NUCOR**  
**BAR MILL GROUP**  
NORFOLK DIVISION

January 11, 2016

Dear Valued Customer:

Effective with shipments February 1, 2016, Nucor Steel - NE will increase all Wire Rod products by \$30.00/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 228-8174.

Nucor Steel – NE thanks you for your business and appreciates your continued support and cooperation.



Rob Colton

PUBLIC DOCUMENT

**PRICE INCREASE LETTERS  
FROM  
NUCOR ENGINEERED BAR GROUP (SOUTH CAROLINA)**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Price Increase Letters- Nucor South Carolina:

April 6, 2017 (maintain level price)

March 14, 2017

February 10, 2017

January 10, 2017

December 12, 2016

November 10, 2016

May 10, 2016

April 11, 2016

March 9, 2016

January 11, 2016

April 6, 2017

Dear Valued Customer:

Effective with shipments May 1, 2017, Nucor Steel – South Carolina will maintain (rolling over from April) our current transactional prices on all wire rod shipments.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel South Carolina

**NUCOR®**  
**ENGINEERED BAR GROUP**

SOUTH CAROLINA DIVISION

March 14, 2017

Dear Valued Customer:

Effective with shipments April 1, 2017, Nucor Steel – South Carolina will increase Wire Rod products by:

Low Carbon: Grades 1026 and lower	Increase of \$45/Ton or (\$2.25/cwt.)
High Carbon: Grades 1030 and higher	Increase of \$60/Ton or (\$3.00/cwt.)

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel South Carolina



# **NUCOR**

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## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

February 10, 2017

Dear Valued Customer:

Effective with shipments March 1, 2017, Nucor Steel – South Carolina will be extending our current February 2017 pricing for transactional Wire Rod shipments. This pricing will remain in effect until further notice.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

---

## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

January 10, 2017

Dear Valued Customer:

Effective with shipments February 1, 2017, Nucor Steel – South Carolina will increase all Wire Rod products by \$45/ton or (\$2.25/cwt.).

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

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## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

December 12, 2016

Dear Valued Customer:

Effective with shipments January 1, 2017, Nucor Steel – South Carolina will increase all Wire Rod products by \$45/ton or (\$2.25/cwt.).

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

---

## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

November 10, 2016

Dear Valued Customer:

Effective with shipments December 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$40/ton or (\$2.00/cwt.).

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# NUCOR

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## BAR MILL GROUP

SOUTH CAROLINA DIVISION

May 10, 2016

Dear Valued Customer:

Effective with shipments June 1, 2016, Nucor Steel – South Carolina will increase Wire Rod products as noted below:

Low Carbon: Grades 1026 and lower	Increase of \$20/Ton
High Carbon: Grades 1030 and higher	Increase of \$30/Ton

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

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## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

April 11, 2016

Dear Valued Customer:

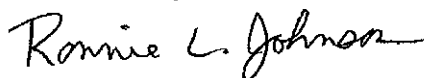
Effective with shipments May 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$50/ton or (\$2.50/cwt.).

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

---

## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

March 9, 2016

Dear Valued Customer:

Effective with shipments April 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$20/ton or (\$1.00/cwt.).

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina

# **NUCOR**

## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

January 11, 2016

Dear Valued Customer:

Effective with shipments February 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$1.50/cwt or \$30/ton.

As always, we will continue to monitor the marketplace and respond accordingly in order to assure you of receiving a competitively priced product.

If you have any questions, please contact your District Sales Manager or the mill direct at (800) 999-7461.

Nucor Steel – South Carolina thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Ronnie L. Johnson  
Sales Manager  
Nucor – South Carolina



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## **CBI EXHIBIT 8**

### CHARTER STEEL’S PRICING MECHANISM

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

**THE INFORMATION IN THIS CBI EXHIBIT  
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## **EXHIBIT 9**

### AMM SCRAP PRICES

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

# American MetalMarket

**Material/Location :** Scrap, ferrous, shredded auto scrap - Consumers / Chicago

(Published 10th of each month)

PERIOD	Average
Nov-07	\$ 280
Dec-07	\$ 309
Jan-08	\$ 385
Feb-08	\$ 388
Mar-08	\$ 405
Apr-08	\$ 535
May-08	\$ 563
Jun-08	\$ 544
Jul-08	\$ 590
Aug-08	\$ 557
Sep-08	\$ 394
Oct-08	\$ 238
Nov-08	\$ 125
Dec-08	\$ 217
Jan-09	\$ 239
Feb-09	\$ 216
Mar-09	\$ 188
Apr-09	\$ 172
May-09	\$ 199
Jun-09	\$ 205
Jul-09	\$ 254
Aug-09	\$ 268
Sep-09	\$ 287
Oct-09	\$ 267
Nov-09	\$ 240
Dec-09	\$ 290
Jan-10	\$ 342
Feb-10	\$ 346
Mar-10	\$ 388
Apr-10	\$ 395
May-10	\$ 361
Jun-10	\$ 351
Jul-10	\$ 315
Aug-10	\$ 338
Sep-10	\$ 366
Oct-10	\$ 344
Nov-10	\$ 358
Dec-10	\$ 400

PERIOD	Average
Jan-11	\$ 457
Feb-11	\$ 457
Mar-11	\$ 455
Apr-11	\$ 455
May-11	\$ 438
Jun-11	\$ 449
Jul-11	\$ 450
Aug-11	\$ 450
Sep-11	\$ 450
Oct-11	\$ 441
Nov-11	\$ 415
Dec-11	\$ 434
Jan-12	\$ 470
Feb-12	\$ 440
Mar-12	\$ 440
Apr-12	\$ 430
May-12	\$ 430
Jun-12	\$ 372
Jul-12	\$ 327
Aug-12	\$ 410
Sep-12	\$ 382
Oct-12	\$ 335
Nov-12	\$ 387
Dec-12	\$ 386
Jan-13	\$ 386
Feb-13	\$ 377
Mar-13	\$ 412
Apr-13	\$ 390
May-13	\$ 368
Jun-13	\$ 360
Jul-13	\$ 376
Aug-13	\$ 366
Sep-13	\$ 357
Oct-13	\$ 359
Nov-13	\$ 390
Dec-13	\$ 415
Jan-14	\$ 438
Feb-14	\$ 408
Mar-14	\$ 388
Apr-14	\$ 398
May-14	\$ 383
Jun-14	\$ 365
Jul-14	\$ 375
Aug-14	\$ 375
Sep-14	\$ 375

PERIOD	Average
Oct-14	\$ 355
Nov-14	\$ 325
Dec-14	\$ 325
Jan-15	\$ 334
Feb-15	\$ 248
Mar-15	\$ 235
Apr-15	\$ 235
May-15	\$ 245
Jun-15	\$ 275
Jul-15	\$ 265
Aug-15	\$ 230
Sep-15	\$ 230
Oct-15	\$ 180
Nov-15	\$ 160
Dec-15	\$ 160
Jan-16	\$ 190
Feb-16	\$ 190
Mar-16	\$ 210
Apr-16	\$ 260
May-16	\$ 280
Jun-16	\$ 250
Jul-16	\$ 240
Aug-16	\$ 240
Sep-16	\$ 218
Oct-16	\$ 198
Nov-16	\$ 228
Dec-16	\$ 270
Jan-17	\$ 305
Feb-17	\$ 283
Mar-17	\$ 323
Apr-17	\$ 293 conf

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## **CBI EXHIBIT 10**

### **“FOREIGN FIGHTER” TRANSACTIONS**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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# **CBI EXHIBIT 11**

## **DELAYED DELIVERY OF WIRE ROD**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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# **CBI EXHIBIT 12**

## **PRICE INCREASES**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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## **CBI EXHIBIT 13**

### DELAYED DELIVERY OF WIRE ROD

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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## CBI EXHIBIT 14

### ROD AVAILABILITY AND DELIVERY DELAYS

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION

APRIL 24, 2017

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# **CBI EXHIBIT 15**

## **RECENT SERVICE AND LEAD TIME ISSUES**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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## **EXHIBIT 16**

### **BRIDGESTONE: BASIC KNOWLEDGE OF TIRES**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

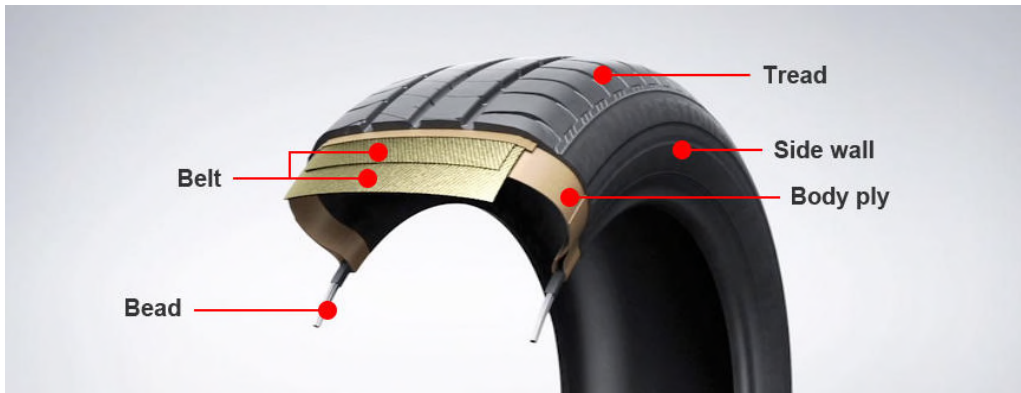
**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

Bridgestone Global

Regional Sites [About Bridgestone](#)[Products](#)[CSR](#)[Investor Relations](#)[Products](#) [Basic Knowledge of Tires](#) [Structure](#)

## Structure



### Products

- Passenger Tires
- Motorcycle Tires
- Commercial Tires
- Specialty Tires
- Diversified Products
- Basic Knowledge of Tires
  - [Structure](#)
  - Materials
  - Functions and performances
  - Variety of tires
  - Trivia

### Tread

The tread is made of rubber compounds and it is the part of a tire that makes contact with the road.

### Side wall

The side wall is a rubber component of a tire that covers between the tread and the bead.

### Body ply

The body ply is the skeleton of a tire which is made of artificial fibers, such as polyester and rayon.

### Belt

The belt provides stiffness to the tread and protect the carcass. It is usually made up of stiff steel cords.

### Bead

The bead is designed to firmly grip the tire to the wheel. The beads contain a steel loop made from a bundle of fine steel wire, making the bead extremely strong.

About Bridgestone The Bridgestone Group is eternally committed to serving society with superior quality. The group will fulfill our responsibilities decisively. As you reach for the future, the Group will remain by your side.

**About Bridgestone**

Philosophy  
Strategy  
Profile  
Locations  
Library  
News  
History  
Event / Sponsorship

**Products**

Passenger Tires  
Motorcycle Tires  
Commercial Tires  
Specialty Tires  
Diversified Products  
Basic Knowledge of Tires

**Technology & Innovation**

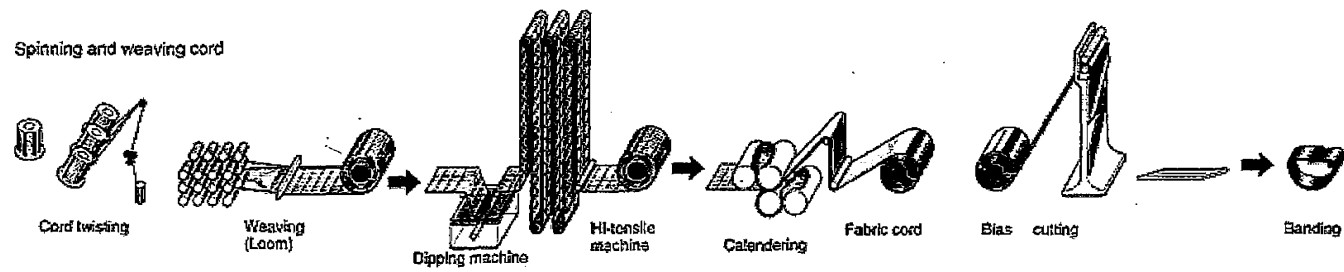
**CSR**  
CSR  
Our Way to Serve  
Corporate Citizenship

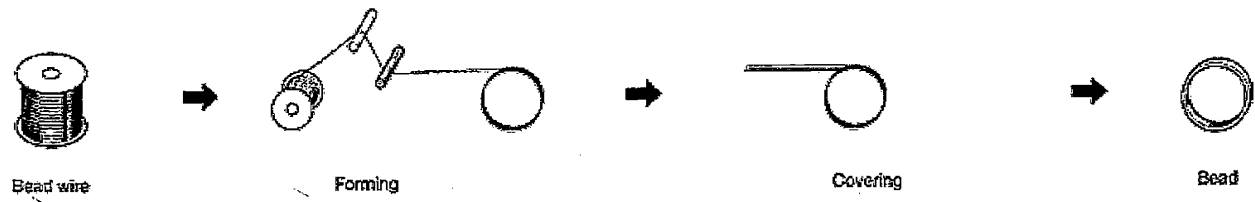
**Investor Relations**

Message from CEO  
IR Library  
Financial Data  
Shareholders' Meeting  
IR Calendar  
What's New

**Global Career**

Spinning and weaving cord





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## **CBI EXHIBIT 17**

### **TIRE PLANT INVESTMENTS OVER THE PAST TWO YEARS**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017



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## **CBI EXHIBIT 18**

### **TIRE CORD QUALIFICATION TIMELINE**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

**POSTCONFERENCE BRIEF  
ON BEHALF OF  
AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

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## **CBI EXHIBIT 19**

### **1080 AND 1090 TIRE CORD SPECIFICATION DATA SHEETS**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
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APRIL 24, 2017

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## **EXHIBIT 20**

### EXCERPT FROM EVRAZ ROCKY MOUNTAIN'S WEBSITE

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
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APRIL 24, 2017


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EVRAZ Rocky Mountain Steel is vertically integrated, manufacturing virtually all of the billets for its Rod and Bar mill.

## WIRE ROD AND COILED REINFORCING BAR

EVRAZ Rocky Mountain Steel is vertically integrated, manufacturing and providing virtually all of the billets for its Rod and Bar mill.

Our products exhibit excellent drawability, tensile uniformity, microstructure and chemical control. This provides our customers with superior, consistent performance and excellent value.

### Wire Rod

- Low Carbon
- Medium Carbon (control-cooled)
- High Carbon (control-cooled)
- High Carbon Tensile Refined

#### Sizes

- 0.197 - 0.750 in (5.5 - 20 mm)

#### Grades

- 1003B to 1093
- High Carbon Tensile Refined Grades
- High Carbon Chemistry Grades

#### Coil Weights

- 4,600 and 5,800 lb

### Wire Rope

Because wire rope is a premium quality product with demanding requirements, it is produced to rigorous internal standards which meet or exceed industry specifications.

Compositional aspects such as segregation control are achieved by controlled melting, casting and rod cooling practices. Surface decarburization is controlled by our walking beam reheat furnace practices, and our ultra heavy duty no-twist V-Block ensures exceptional dimensional control of the rod, which permits more accurate prediction of finished wire properties. Precise controlled cooling of the rod is possible via our modern Stelmor cooling conveyor. Our processes produce carbon steel grades of 1045 up to 1093 to meet the tensile refined grade requirements.

### PC Strand

Due to the critical nature of this product, EVRAZ Rocky Mountain Steel employs selective scrap control along with electromagnet stirring both in the mold and below the mold to ensure our products meet the demanding requirements of this application. Tensile Refined grades are typically employed in these applications due to the requirement of precise final wire/strand tensile strength.

### Tire Bead and Cord

The high strength, flexibility and adhesive qualities of steel bead and cord make it an ideal rubber reinforcing material. EVRAZ Rocky Mountain Steel produces 5.5 mm high-carbon rods to meet the high quality standards required by our customers. All heats are carefully analyzed for chemical components and the wire rod is critically inspected for surface and internal defects. Each heat of steel is processed as a single unit under controlled conditions.

#### Representative chemical specification

##### Carbon

- 0.67 - 0.80%

##### Copper

- Trace

##### Manganese

- 0.40 - 0.70%

##### Nickel

- Trace

##### Silicon

- 0.15 - 0.30%

##### Chromium

- Trace

##### Phosphorus

- 0.020% max.

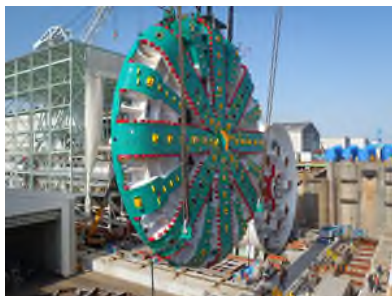
##### Nitrogen

- 60 ppm

##### Sulfur

- 0.020% max.

## Coiled Reinforcing Bar



Big Bertha drilled the Seattle Tunnel; EVRAZ supplied the rebar for its reinforced concrete supporting arches.

Our coiled reinforcing bar represent some of the highest quality rebar products in the world. Our bar exhibits excellent tensile and yield strength, as well as deformation uniformity, microstructure and chemical control. And it provides our customers with superior, consistent performance and value.

The EVRAZ Rocky Mountain Steel facility produces deformed material to ASTM A615, ASTM A706, Dual Grade and CSA standards in the following size ranges:

#### Sizes available in 4,200 lb coils

- #3 (10 mm)
- #4 (13 mm)
- #5 (16 mm)
- #6 (19 mm)
- 10M Metric
- 15M Metric

Also available: ASTM A-36 and A-615 Grade 40 and 60 smooth bar in rod diameters between .197" to .8125" in coil weights ranging from 4,200 to 5,800 lbs.

Contact us for more information regarding wire rod and coiled reinforcing bar products.

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# **CBI EXHIBIT 21**

## **QUALIFICATION EFFORTS**

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
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ON BEHALF OF  
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APRIL 24, 2017

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## **EXHIBIT 22**

“REPUBLIC STEEL ANNOUNCES PLAN TO IDLE LORAIN MILL”  
*THE MORNING JOURNAL*  
(JANUARY 7, 2016)

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM*  
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ON BEHALF OF  
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APRIL 24, 2017

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Home

# Republic Steel announces plan to idle Lorain mill



Republic Steel announced, Jan. 7, it will idle its rolling mill operations at the Lorain plant.

Eric Bonzar — The Morning Journal

By **Richard Payerchin**, *The Morning Journal*

POSTED: 01/07/16, 3:38 PM EST | UPDATED: ON 01/07/2016

10 COMMENT

Republic Steel will idle its rolling mill operations at its Lorain steel mill, resulting in about 200 layoffs, according to an announcement on Jan. 7.



Republic Steel announced, Jan. 7, it will idle its rolling mill operations at the Lorain plant.

Eric Bonzar — The Morning Journal

## Republic Steel announces plan to idle Lorain mill

Meanwhile, United States Steel Corp. will work just two weeks, from now until the end of March, said the leader of the Lorain United Steel Workers Local 1104.

The news came out this week as Lorain steelworkers braced for job cuts coming in the first quarter of 2016.

Republic Steel and U.S. Steel sit next to each other in a sprawling complex between the Black River and East 28th Street in Lorain.

Canton-based Republic Steel announced the plant idling will be temporary, but there was no indication of when the local mill might go back into production.

"The Lorain plant has continued to struggle over the last year with a decline in the energy market and customer demand," a company statement said. "With a negative 2016 economic forecast and the continued dumping of steel imports, Republic had no other option but to idle the Lorain plant."

"We hope that we can resume the Lorain operations in the near future," said company President and Chief Executive Officer Jaime Vigil. "We are positioned for growth and will

be ready to provide capacity once the market turns around."

The layoffs will be staggered over the next few months, with the majority being completed by the end of the first quarter. The United Steel Workers Local 1104, which represents hourly workers, was notified of the plans to idle the plant, according to Republic Steel's announcement.

Republic workers expected to start receiving notices as early as Jan. 8, said Dennis Hamilton, president of the USW Local 1104.

By March, the Republic Steel mill is expected to be "completely idled," he said.

"So there will be nothing going on at Republic at all, absolutely nothing," Hamilton said.

This month there are four days of operations scheduled at Republic Steel's bar mill, with another four days of work in February, Hamilton said. More information on exact dates was expected when the steelworkers receive what are known as Worker Adjustment and Retraining Notification Act, or WARN Act, notices, he said.

The change will be devastating for the city of Lorain, the county of Lorain and the state of Ohio, Hamilton said.

Lorain Mayor Chase Ritenauer declined to comment before seeing details expected in the WARN Act notice.

City Interim Safety-Service Director Derek Feuerstein said the city administration did not receive advance notice from Republic Steel about the situation. "But it's sad to see it happen and it's sad for the workers involved," he said.

On Jan. 6, U.S. Steel management and workers had a layoff minimization plan meeting about reducing U.S. Steel's workforce drastically and shutting down part of its facility, Hamilton said.

U.S. Steel is expected to be on layoff now until Jan. 31; then have shifts of about 76 people working for two weeks.



## Republic Steel announces plan to idle Lorain mill

The U.S. Steel side is expected to be shut down the work weeks starting March 13, 20 and 27. It was unclear if the plant would have work during the weeks starting Feb. 28 and March 6, Hamilton said.

"The big thing that would change things here for both sides is the current economic situation pertaining to steel," Hamilton said.

In July 2015, Republic Steel stopped supplying rounds to the U.S. Steel side, idling Republic Steel's electric arc furnace. The rounds were the solid metal bars that U.S. Steel reformed to create steel pipe, Hamilton said.

Republic Steel offered separations in September and November last year that resulted in more than 200 job cuts, according to Hamilton's January 2015 report to members.

Since then, Republic Steel in Lorain has made special bar quality steel for the automotive industry, Hamilton said. That industry is doing well, but is "very, very competitive," so orders have been slim for the Lorain plant, he said.

U.S. Steel's Lorain Tubular Operations have suffered largely due to low-cost imports "dumped" onto the steel market. Low gas and oil prices also mean there is less fracking and rigging for gas and oil exploration and drilling, Hamilton said.

Tariffs and the international market are hurting both Republic Steel and U.S. Steel, Hamilton said.

For years, the United States was the top producer of steel tubular products; now 70 percent of the world market for tubular products is made overseas, Hamilton said.

"That foreign trade is killing us," he said.

Meanwhile, negotiations between U.S. Steel and the USW made national news as both sides wrangled over a new contract. Local USW workers are expected to meet this month for a contract briefing and voting, with results counted starting Feb. 1, Hamilton said.

As of the first week of January 2015, the steel mills had more than 1,300 people working, Hamilton said.

As of this week, U.S. Steel has 637 workers on the books, with 337 working this week, 279 on layoff and 21 out on sick leave, Hamilton said.

Republic Steel had about 600 to 650 workers at the start off 2014 in Lorain. This week the company has 314 workers on the books, with 60 working this week and 254 on layoff, Hamilton said.

By Jan. 31, Republic Steel is scheduled to have 76 people working at its Lorain plant, he said.

By March, Republic Steel will have a minimal crew at the plant watching for fires and asset protection, Hamilton said.

Republic Steel said about 900 workers will continue at its mills in Canton, Massillon, Solon, and Lackawanna, N.Y., and Hamilton, Ontario.

Hamilton predicted layoffs are imminent at those facilities as well.

Based on the union contracts, idling a plant is different from shutting it down, which has different legal and financial obligations such as severance pay and entitlements, Hamilton said.

In Lorain, Republic Steel's blast furnace stopped production and has been "idled" since 2008, Hamilton said. The company must give a 90-day notice of shutting down a plant, "but they could say it's idle for years," he said.

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## **EXHIBIT 23**

“REPUBLIC STEEL TO IDLE LORAIN PLANT”

*THE CHRONICLE*

(JANUARY 8, 2016)

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
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ON BEHALF OF  
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APRIL 24, 2017

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THE CHRONICLE



NEWS

# Republic Steel to idle Lorain plant

By Brad Dicken

Published on Jan. 8, 2016 | Updated 1:00 a. m.



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View a timeline of events for Republic Steel [HERE](#).

LORAIN — Republic Steel will indefinitely idle its Lorain plant by the end of March, the company announced Thursday.

The Canton-based company plans to stagger what it described as roughly 200 layoffs over the next few months and will continue to employ about 900 workers at other locations in Ohio, New York and Ontario, according to a news release.

"We hope that we can resume the Lorain operations in the near future," Republic President and CEO Jaime Vigil said in a



statement. "We are positioned for growth and will be ready to provide capacity once the market turns around."

The announcement to idle the two remaining steel mills at the plant came as a blow to United Steelworkers Local 1104, which has weathered sizeable layoffs over the past year at both Republic and on the U.S. Steel side of the sprawling steel plants that run along East 28th Street. Layoffs are also expected at U.S. Steel beginning next week, union officials said.

Union President Dennis Hamilton said he and other union officials were told of Republic's decision to idle the plant during a meeting with management early Thursday.

"For an indefinite amount of time they're going to have everybody out of the plant," he said. "It's going to be an idle facility."

Hamilton said the union wasn't told exactly when the plant will resume operations, but according to a memo sent to salaried employees by Vigil on Thursday, it doesn't appear it will be anytime soon.

"Both mills have been operating at extremely low production levels due to the depressed energy and mining markets combined with unfairly traded imports, and there appears to be little prospect for the market to significantly improve in 2016," Vigil wrote in the memo.

Hamilton said he doesn't know what will happen with salaried employees working at the plant.

"To share sacrifice with us, I don't have a commitment on that yet," he said.

#### **Workers react**

Craig Wright, the union's vice president, described the mood among the membership as "pretty dejected" after they learned the news.

"It was a bad day for us," he said. "It was a bad day for steelworkers in general."

Jim Bissett, a Republic worker, said as he left work Thursday afternoon that there's no guarantee that he'll be back to the job he's held for 39 of his 58 years.

"It's a 50-50 thing," Bissett said. "If I was a betting man, I'd say no, but they're saying it's idle because it behooves them."

Bissett said he thinks mismanagement of the facility and a lack of interest in the Lorain plant by company leadership played a role in the decision to idle the mill.

"They didn't give us a chance," he said.

Another veteran steelworker with nearly 39 years at the plant declined to give his name, but said working at the plant has never been easy.

"I've been through strikes, lockouts, shutdowns," he said. "I've seen it all before."

The worker also said that if the company can't sell its products, then that leads to bad things for the company and its employees.

"I'm very fortunate. The house is paid off, kids are on their own. All I've got to worry about is myself and my wife," he said, but added that younger workers have mortgages, car payments and little kids to worry about.

Workers will receive 26 weeks of unemployment, which can be extended by up to two years by joining a job retraining program, Hamilton said. A handful of workers probably will remain on the job to maintain the plant.

He said management told the union that the decision to idle the plant had nothing to do with the workers, who have been hitting quality and other metrics.

"It's market conditions that's making this happen," he said.

Hamilton said the plant will continue to make bar steel for a few more weeks and the rolling mill will continue to operate for a couple more weeks as well.

There's also speculation that there could be other changes at the plant, Hamilton said, including the possibility that someone might buy the facility or that there could be a shift to making pig iron. He said people have been seen inspecting the old blast furnace, idled in 2008, and other areas of the plant.

It's possible that portions of the plant could be sold and relocated, Hamilton said, although the company hasn't shared the details of any potential deals with the union.

The number of Republic workers who have found themselves out of work has increased in the past year.

Hamilton has said when he took over as union president in May there were 560 people working at Republic.

Republic announced in July that it was idling its newly built electric arc furnace indefinitely because of the oil glut that has seen oil and

gas prices plunge, driving down the demand for steel for use in the drilling and fracking industries.

The arc furnace was part of a \$120 million investment that Republic made in its Lorain plant and opened in 2014 to great fanfare before the oil and gas exploration market crashed.

Hamilton said the electric arc furnace has been partially dismantled and placed in storage to protect some of the components from the cold weather.

He said in recent months the number of workers at the plant during a given week has fluctuated between 70 and 200. There are about 320 members on the union's rolls for the Republic side of the plant.

The company also offered buyouts, ranging from \$5,000 to \$25,000, to workers last year and more than 200 accepted the offer, according to Hamilton.

#### **Impact on the city**

Lorain Mayor Chase Ritenauer and other city officials said they weren't surprised by Republic's decision.

"While not good news and certainly regrettable news, it's not unexpected news," he said.

The layoffs will also deal an additional blow to the city of Lorain. Ritenauer has been discussing where to make cuts to plug a \$2.3 million projected budget shortfall. That deficit will be even higher now.

Lorain city Auditor Karen Shawver said that before Republic's announcement Thursday, she had predicted that the city would see \$478,500 less from Republic this year. With more layoffs at the plant, she expects the city to lose another \$304,000.

She's also predicting that U.S. Steel and its employees will pay \$526,000 less in taxes this year and that figure doesn't take into account the upcoming layoffs the company has planned.

In total, she said, the city will take in at least \$1.3 million less from the two steel companies.

The impact ripples out from there, Wright said, because the layoffs will mean less money for the city, which will have to make cuts of its own. Many city workers, including police officers and firefighters, come from steel families, he said.

Brian Sealy, the union's staff representative, said that in the past when steelworkers lose their jobs, it's rare for all of them to return to work, even when the economic conditions allow for a rebound.

"It's rough," he said.

Ritenauer said steel helped shape the Lorain, including creating middle-class jobs.

"We're the International City, but we're also known for steel," Ritenauer said. "Steel's been continually important in Lorain's history and it remains such. I'm not ready to say it's done."

Lorain City Council President Joel Arredondo, a Democrat who also serves as president of the Mexican Mutual Society's club across the street from Republic, said he understands the market forces that drove the decision and with gas under \$2 a gallon, he doesn't see it changing anytime soon.

"It's unfortunate, but it's something we've got to deal with," Arredondo said. "When Ford closed up in Lorain in '05, Lorain didn't close up."

Arredondo said steel has always played an important role in Lorain's identity, including the large number of ethnic social clubs, many of which lined East 28th Street across from the steel mills.

He said decades ago before unions helped create safer working conditions, the bars and clubs were the last stop of men heading to work in dangerous mills so they could fortify themselves with the courage they needed to work above pits of fire.

Those days are long past, Arredondo said, adding that only a few bars and clubs remain along the once-busy strip.

"It's almost like a ghost town in that area of town," he said.

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## **EXHIBIT 24**

“NO TIMELINE,  
BUT SPA AGREES TO SHUT GEORGETOWN PORT  
UNDER REUSE PLAN”  
*THE POST AND COURIER*  
(JANUARY 24, 2017)

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
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TOP STORY

## No timeline, but SPA agrees to shut Georgetown port under reuse plan

By David Wren [dwren@postandcourier.com](mailto:dwren@postandcourier.com) Jan 24, 2017



The former ArcelorMittal steel mill sits along the Sampit River near Georgetown's historic district. File

Buy

The State Ports Authority has agreed to close its struggling Port of Georgetown so local governments can include it in a redevelopment plan to replace the city's idled steel mill with a mixture of waterfront businesses and light industry, officials said Tuesday.

The redevelopment efforts are in the early stages and there is no timetable for the port's closure, said Clint Eisenhower, the SPA's senior vice president for external affairs. Eisenhower said the breakbulk facility along the Sampit River about 60 miles north of Charleston will continue to operate for the foreseeable future, but it makes sense for the property to be included in a reuse plan.

"It allows for a more integrated project as opposed to a developer having to carve out parcels," he said.

Georgetown's city and county governments are moving forward with a joint agreement that specifies what steps they will take to spur redevelopment of the steel mill site, including possible creation of special tax districts and annexation of the SPA's property. Georgetown City Council approved the agreement last week, and Georgetown County Council was scheduled to discuss it Tuesday.

However, Georgetown Mayor Jack Scoville said redevelopment efforts are being thwarted by mill owner ArcelorMittal

"We've tried to get them to come to the table, but they won't communicate with us," Scoville said of the Luxembourg-based steel giant. Scoville said the last time the city heard from the company was in June.

An ArcelorMittal spokeswoman did not respond to The Post and Courier's requests for comments. The company closed the Georgetown mill in August 2015, leaving 226 people without jobs. The shutdown has cost the city about \$500,000 in annual tax and business license revenue.

In September, the Urban Land Institute, a nonprofit that promotes responsible land use, sponsored a week-long series of meetings to brainstorm ideas for revitalizing the 150-acre waterfront site of the mill and port. A plan was formed to create "an incubator for entrepreneurs, businesses and sectors that will help diversify the economy and forge a new economic destiny for Georgetown," according to the group's website.

Scoville said there are "serious and very capable developers who want to purchase the

property," but they cannot get a response from ArcelorMittal.

"It's a tremendous opportunity, but for whatever reason the company won't talk to us," Scoville said. "It's frustrating."

Scoville said local governments want to include the port property in any redevelopment plan because its ongoing operation as maritime facility "is not feasible."

The fast-silting harbor makes it difficult for ships to visit the port and it will take \$66 million - money the federal government says it doesn't have - to deepen the channel to its maximum 27-foot depth.

"Frankly, the ports authority would be happy to get rid of the property and focus on Charleston," Scoville said.

Eisenhauer said the SPA, which also operates the Port of Charleston, would be in favor of Georgetown annexing the port for redevelopment because the city could then generate tax revenue from the property. The SPA, a state agency, does not pay taxes. Any annexation would have to be approved by the State Fiscal Accountability Authority.

The Port of Georgetown's fortunes mirrored the adjacent steel mill, which was among the facility's biggest customers when it was one of the country's leading wire rod producers. The port was handling 1.8 million tons of material at the turn of the century, but that number declined to 265,000 pounds in 2008.

During the first two months of fiscal 2017, which started on July 1, the Port of Georgetown handled just 1,517 tons of cargo. That was down from 88,521 tons moving across the terminal during the same period a year earlier.

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Reach David Wren at 843-937-5550 or on Twitter at @David\_Wren\_

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**David Wren**



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## **EXHIBIT 25**

“IN 4-3 VOTE, GEORGETOWN COUNCIL PASSES RESOLUTION  
TO REZONE STEEL MILL SITE”

*GEORGETOWN CITY NEWS*

(MARCH 16, 2017)

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
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APRIL 24, 2017

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## In 4-3 vote, Georgetown council passes resolution to rezone steel mill site

By Eileen Keithly [ekeithly@southstrandnews.com](mailto:ekeithly@southstrandnews.com) Mar 16, 2017



Mark Stevens

The Georgetown City Council on March 16 narrowly approved a resolution to rezone the ArcelorMittal steel mill site and surrounding areas to permit mixed uses.

During its regular monthly council meeting, the council approved the resolution on a 4-3 vote, with council members Brendon Barber, Sheldon Butts and Clarence Smalls voting in dissent. Barber was the only council member who commented on the resolution, saying he thought the council was rushing the process.

The resolution states that the rezoning action is needed to comply with the Urban Land Institute's vision, which states that continued heavy industrial uses within the redevelopment area are not in the best interests of the City of Georgetown.

Rezoning laws require the council to send the resolution to the planning commission for review. The commission will hold a public hearing in April and then make its recommendation to the council.

Earlier this week, Mayor Jack Scoville said the city council will review the commission's recommendation, make its own determination and then move forward.

"Sending the resolution to the planning commission is just one in many steps that the council must take to move forward," Scoville said. "We can't even have a first reading on the resolution until the commission makes a recommendation after holding a public hearing."

In other business, the council passed resolutions proclaiming March 2017 as American Red Cross Month, March 12-18 as Sunshine Week and April 2017 as Fair Housing Month in the City of Georgetown.

Read more about the meeting in the Wednesday, March 22, edition of The Georgetown Times.

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## **EXHIBIT 26**

“SEN. GRAHAM STOPS BY GEORGETOWN FOR AN UPDATE”  
*SOUTH STRAND NEWS (GEORGETOWN TIMES)*  
(APRIL 18, 2017)

BEFORE THE U.S. INTERNATIONAL TRADE COMMISSION

*IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS  
OF CARBON AND ALLOY STEEL WIRE ROD FROM BELARUS, ITALY, KOREA, RUSSIA, SOUTH AFRICA, SPAIN, TURKEY,  
UKRAINE, THE UNITED ARAB EMIRATES, AND THE UNITED KINGDOM  
INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (PRELIMINARY)*

POSTCONFERENCE BRIEF  
ON BEHALF OF  
**AMERICAN WIRE PRODUCERS ASSOCIATION**

APRIL 24, 2017

[http://www.southstrandnews.com/news/sen-graham-stops-by-georgetown-for-an-update/article\\_765e71ae-23cc-11e7-ac0c-9768c140f5a5.html](http://www.southstrandnews.com/news/sen-graham-stops-by-georgetown-for-an-update/article_765e71ae-23cc-11e7-ac0c-9768c140f5a5.html)

## Sen. Graham stops by Georgetown for an update

By Anita Crone [news@southstrandnews.com](mailto:news@southstrandnews.com) Apr 17, 2017 Updated Apr 18, 2017



Anita Crone/South Strand News

[Buy](#)

U.S. Sen. Lindsay Graham, left, chats with Georgetown City Councilman Ed Kimbrough during his April 17 visit to Georgetown.

U.S. Sen. Lindsey Graham assured Georgetown city officials Monday that he intends to be in contact with them regularly regarding the fate of the steel mill and other issues.

Graham stopped off at Francis Marion Park on the Georgetown waterfront, where he was greeted by Mayor Jack Scoville and three members of the city council, Democrat Sheldon Butts and Republicans Carol Jayroe and Ed Kimbrough.

Conceding that the push to reopen the plant as a steel mill relies on the border adjustment tax – also known as the value-added tax – Graham said he did not expect such a tax to pass this year.

“We don’t have a way forward on taxes yet,” he said.

City officials said they were not overly concerned about the issue, because no buyer has been found for the plant.

“As of now, three prospective buyers have been identified,” Scoville said. “One company has been in touch with the Steelworkers union about the contract.”

Meanwhile the city is working to rezone the property from its heavy industrial status.

“We need to get this right,” Graham said. “Long after we’re dead and gone, this will remain.”

He praised U.S. Rep. Tom Rice, R-7th, and promised that he and Rice would be back to meet with Georgetown officials to help facilitate the development of the plant site.

“But what we really need is high-end jobs,” Butts said.

“We’re your partner,” Graham promised. “This is a once in a lifetime opportunity and we’d better get it right.”

Graham also questioned officials about the status of the port and of infrastructure. But he cautioned that the 2018 budget cuts funds for the Army Corps of Engineers, which would be bad for the area.

All four local officials said that the closing of the port of Georgetown is not an issue. “The tonnage is not there anymore,” Kimbrough said, adding that Georgetown was founded as a seaport town.

“My husband is a (harbor) pilot, and we haven’t had a ship in two years,” Jayroe added. “We can’t get a deep-draft boat in here.”

"If I had a business, I'd come here in a heartbeat," Graham said.

Graham said there was a lot of bipartisan support for improving infrastructure.

"We haven't had a gas tax in like forever. No one in my business wants to raise taxes, but there comes a point in time where if you don't spend money you're going to regret it," he said. "The revenue stream for roads is insufficient."

On the federal level, Graham said that's where President Donald Trump would shine. "He's a builder by trade, so he can build. I would be surprised if we don't do an infrastructure bill."

"I've talked to the president multiple times, and I intend to help him," Graham said of his relationship with Trump. "I think he's a dealmaker at heart. I hope he replaces Obamacare with a bipartisan bill."

Graham also praised the president for his change of heart on Syria and for standing up to North Korea.

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PUBLIC  
CERTIFICATE OF SERVICE

I hereby certify that on this 24<sup>th</sup> day of April, 2017, I have caused to be served a true and complete copy of a *Postconference Brief* (Nonconfidential Version), as filed with the U.S. INTERNATIONAL TRADE COMMISSION, on behalf of the AMERICAN WIRE PRODUCERS ASSOCIATION, in the matter of *Carbon and Certain Alloy Steel Wire Rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, the United Arab Emirates, and the United Kingdom*, Inv. Nos. 701-TA-573–574 and 731-TA-1349–1358 (Preliminary), by hand, upon the following parties:

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**APRIL 24, 2017**

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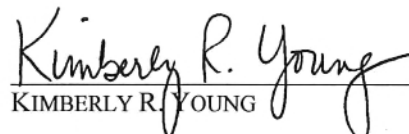
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