

September 7, 2017

The Honorable Donald J. Trump  
President of the United States  
The White House  
1600 Pennsylvania Avenue  
Washington, DC 20500

Subject: Section 232 Investigation of Steel Imports

Dear Mr. President:

We respectfully submit this letter on behalf of the undersigned associations in connection with the Section 232 investigation of steel imports and their impact on national security.

These associations represent a variety of American industries that buy steel to manufacture many thousands of downstream products, which are essential to the prosperity and national security of the United States. Our members make everything from steel wire used in control cables and fasteners for military aircraft, fabricated steel plate doors and floors for military vehicles and many types of machined and formed steel products that improve the life of millions of Americans on a daily basis.

**Collectively, the members of our associations represent 1,003,854 jobs at 30,631 facilities, compared with 81,873 jobs at 880 facilities in the US basic steel industry.**

Our member companies source the majority of their steel requirements from the domestic steel industry, but they also require continuing access to global supply chains. Downstream steel manufacturers support a strong national defense and a strong domestic steel industry. However, we believe that restrictions on basic steel imports will actually adversely impact national security, the economy, and the steel industry itself.

We are very concerned about the unintended and disastrous consequences which Section 232 restrictions on imports of basic steel products would have on our industries.

- Such restrictions would almost certainly result in shortages of critical raw materials for our companies' operations, and there are many types of steel products that are simply not available from domestic steel mills.
- Import restrictions under Section 232 would impact both the availability and price of steel raw materials, placing downstream industries at a crippling competitive disadvantage to foreign manufacturers of our products.
- Unavailability and increased costs would force our customers to go offshore to make or buy their products, and this will inevitably result in less demand from domestic steel mills.

- Without a viable customer base – the downstream steel manufactures and our customers – the domestic steel mills will quickly suffer from less demand and loss of markets.

It would be a tragic result for our country if, by imposing unnecessary and unwarranted restrictions on steel imports, such restrictions not only cause serious damage to our industries but also undermine the long-term viability of the US steel mills. As evidenced by the more than 160 antidumping and countervailing duty orders in place against 37 countries and 25 categories of basic steel products, the US steel industry has long been successful in protecting itself from unfairly traded steel using the US trade laws.

Accordingly, we respectfully urge you to avoid any decision which would do harm to so many downstream steel manufacturing companies, our employees, and our customers, with little or no additional protection to the basic steel industry.

On behalf of our member companies, we thank you for your consideration.

Kimberly Korbel, Executive Director  
American Wire Producers Association  
[kkorbel@awpa.org](mailto:kkorbel@awpa.org)  
703-299-4434

CC: The Honorable Wilbur L. Ross, Jr., The Honorable Gary Cohen, The Honorable Robert E. Lighthizer

The following jobs data is from the Bureau of Labor Statistics, North American Industry Classification System (NAICS), which collects employment data in the US. The steel mill data above is NAICS code 331111. All data is dated December 2016.

| <b>Association/NAICS codes</b>  | <b>Jobs</b> | <b>Facilities</b> |
|---|-------------|-------------------|
| <b>American Gear Manufacturers Association</b>                          |             |                   |
| 333612 Speed Changer, Industrial High-Speed Drive, & Gear Manufacturing | 11,403      | 295               |
| <b>American Wire Producers Association</b>                              |             |                   |
| 331222 Steel Wire Drawing   | 11,006      | 252               |
| 332618 Other Fabricated Wire Product Manufacturing                      | 25,600      | 914               |
| <b>Can Manufacturers Institute</b>                                      |             |                   |
| 332431 Metal Can Manufacturing  | 19,663      | 219               |
| <b>Fabricators and Manufacturers Association, International</b>         |             |                   |
| 332312 Fabricated Structural Metal Manufacturing                        | 87,174      | 3,363             |
| 332313 Fabricated Plate Work Manufacturing                              | 43,254      | 1,759             |

**Forging Industry Association**

|  |        |     |
|--|--------|-----|
| 332111 Ferrous Forging                         | 21,441 | 499 |
| 332112 Non-ferrous forging (includes aluminum) | 7582   | 95  |
| 332114 Custom Roll Forming                     | 6593   | 155 |

**Industrial Fasteners Institute**

|   |        |     |
|---|--------|-----|
| 332722 Nut, Bolt, Screw, Rivet and Washer Manufacturing | 39,366 | 799 |
|---|--------|-----|

**National Precast Concrete Association**

|   |        |       |
|---|--------|-------|
| 327390 Other Concrete Product Manufacturing | 54,472 | 2,170 |
|---|--------|-------|

**National Tooling and Machining Association**

|   |        |       |
|---|--------|-------|
| 333514 Special Dies & Tools, Die Sets, Jigs & Fixture Mfg | 43,871 | 2,339 |
| 333517 Machine Tool Manufacturing                         | 27,919 | 1,053 |

**North American Association of Food Equipment Manufacturers**

|   |        |       |
|---|--------|-------|
| 332215 Metal Kitchen Cookware, Utensil, Cutlery, & Flatware   | 9,200  | 204   |
| 332618 Fabricated Wire Product Manufacturing  | 25,600 | 914   |
| 333318 Commercial & Service Industry Machinery Mfg  | 60,391 | 1,880 |
| 333415 Air-Conditioning & Warm Air Heating Equipment &<br>Commercial & Industrial Refrigeration Equipment Mfg | 84,510 | 1,040 |

**North American Die Casting Association**

|   |        |     |
|---|--------|-----|
| 331523 Nonferrous Metal Die-casting Foundries Firms | 34,763 | 430 |
|---|--------|-----|

**Precast/Prestressed Concrete Institute**

|  |        |       |
|--|--------|-------|
| 327390 Other Concrete Product Manufacturing  | 54,472 | 2,170 |
| 23812 Steel and Precast Concrete Contractors | 83,110 | 5,155 |

**Precision Machined Products Association**

|   |         |       |
|---|---------|-------|
| 332721 Precision Turned Product Manufacturing | 103,594 | 3,507 |
|---|---------|-------|

**Precision Metalforming Association**

|   |        |       |
|---|--------|-------|
| 336370 Motor Vehicle Metal Stamping                   | 97,719 | 776   |
| 332119 Metal Crown, Closure, and Other Metal Stamping | 53,703 | 1,419 |

**Spring Manufacturers Institute**

|  |        |     |
|--|--------|-----|
| 332613 Spring Manufacturing                        | 16,806 | 443 |
| 332618 Other Fabricated Wire Product Manufacturing | 25,600 | 914 |

**Tube and Pipe Association**

|  |        |     |
|--|--------|-----|
| 332996 Fabricated Pipe and Pipe fittings | 35,114 | 951 |
|--|--------|-----|

|              |                  |               |
|--------------|------------------|---------------|
| <b>TOTAL</b> | <b>1,003,854</b> | <b>30,361</b> |
|--------------|------------------|---------------|