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November 13, 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 (Final)

Number of Pages: 169

*Confidential Business Information Has Been Deleted  
from Pages 4-6, 9, 13, 14, 24, 26-28 and 32,  
as well as throughout Exhibits 4, 6 and 7; and  
CBI Exhibits 1, 2, 5, 8 and 9 Have Been Omitted  
from This Prehearing 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: Prehearing Brief*

Dear Madam Secretary:

On behalf of the American Wire Producers Association ("AWPA"), we respectfully submit the nonconfidential version of a *Prehearing Brief*, pursuant to 19 C.F.R. §§ 201.8(d) and 207.3(c). The confidential version of this *Prehearing Brief* was filed with the U.S. International Trade Commission ("Commission") on November 9, 2017.<sup>1</sup>

Confidential business information has been deleted from pages 4-6, 9, 13, 14, 24, 26-28 and 32, as well as throughout Exhibits 4, 6 and 7; and CBI Exhibits 1, 2, 5, 8 and 9 have been

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<sup>1</sup> The nonconfidential version of the *Prehearing Brief* is being submitted on November 13, 2017, because November 10 was a Federal holiday, and the Commission was closed.

NONCONFIDENTIAL VERSION

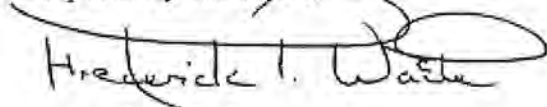
THE HONORABLE LISA R. BARTON  
U.S. INTERNATIONAL TRADE COMMISSION  
November 13, 2017  
Page 2

omitted from this *Prehearing Brief*. Pursuant to 19 C.F.R. §§ 201.6(c) and 207.3(c), we have marked these pages and exhibits in which proprietary information has been deleted with "PUBLIC VERSION." This deleted proprietary information concerns or relates to the actual experiences of individual AWPA 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 AWPA 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

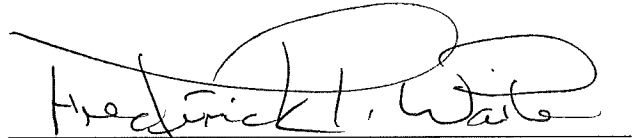
Attachments

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 (FINAL)

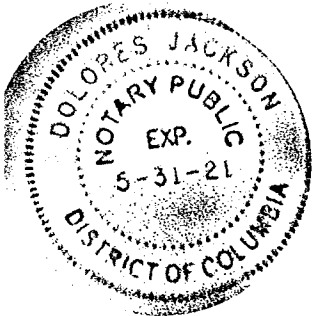
I, FREDERICK P. WAITE, certify that I have read the attached *Prehearing Brief* (Nonconfidential Version) on behalf of the AMERICAN WIRE PRODUCERS ASSOCIATION. Based upon the information made available to me, I have no reason to believe that this submission contains any material misrepresentation or omission of fact, and I certify that the confidential information omitted 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 13<sup>th</sup> day of November, 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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throughout Exhibits 4, 6 and 7; and CBI Exhibits 1, 2, 5, 8  
and 9 Have Been Omitted from This Prehearing Brief.*

*Total Pages: 163*

*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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<b>IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS OF:</b>	
<b>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</b>	<b>USITC INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (FINAL)</b>

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**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

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Dated: November 13, 2017

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**EXHIBIT LIST**

EXHIBIT 1	MONTHLY SCRAP PRICES	Confidential Business Information ("CBI") Exhibit
EXHIBIT 2	MOVEMENT OF SCRAP PRICES AND WIRE ROD PRICES	CBI Exhibit
EXHIBIT 3	PRICE INCREASE ANNOUNCEMENTS (2016–2017)	Public Exhibit
EXHIBIT 4	AWPA MEMBERS SOURCING OF WIRE ROD PURCHASES	CBI/Public Versions
EXHIBIT 5	DELAYED DELIVERIES AND FULL ORDER BOOKS	CBI Exhibit
EXHIBIT 6	U.S PURCHASERS COMPETE WITH DOMESTIC ROD SUPPLIERS	CBI/Public Versions
EXHIBIT 7	AWPA MEMBERS MAJOR PURCHASING FACTORS	CBI/Public Versions
EXHIBIT 8	GEORGETOWN STEEL MILL CLOSURE (MAY 2015)	CBI Exhibit
EXHIBIT 9	REPUBLIC’S LORAIN MILL	CBI Exhibit
EXHIBIT 10	NEWS ARTICLE ON GEORGETOWN MILL (APRIL 2017)	Public Exhibit
EXHIBIT 11	NEWS ARTICLES ON GEORGETOWN MILL (AUGUST 2017)	Public Exhibit
EXHIBIT 12	NEWS ARTICLE ON GEORGETOWN MILL (AUGUST 2017)	Public Exhibit
EXHIBIT 13	U.S. CONSUMPTION AND DOMESTIC PRODUCTION OF STEEL WIRE ROD	Public Exhibit
EXHIBIT 14	U.S. IMPORTS OF CERTAIN STEEL WIRE PRODUCTS FROM ALL SOURCES	Public Exhibit

**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 (FINAL)**

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**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

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**I. INTRODUCTION**

The American Wire Producers Association (“AWPA”) represents independent U.S. producers of carbon, alloy, and stainless steel wire and wire products.<sup>1</sup> Altogether these companies consume between 75 and 85 percent of the steel wire rod sold in the open market in the United States, and they manufacture thousands of products ranging from prestressed concrete (“PC”) steel wire strand to chain link fence to welding wire to nails to steel wire garment hangers. Therefore, AWPA member companies have a unique perspective and understanding of the conditions of competition in the domestic wire rod market and the linkage between various factors that affect the availability, quality, and pricing of carbon and alloy steel wire rod.<sup>2</sup>

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<sup>1</sup> In addition to independent wire producers, domestic wire rod mills—including all of the Petitioners—are Associate Members of the AWPA.

<sup>2</sup> We note that AWPA members who submitted responses to the Commission’s *U.S. Purchasers’ Questionnaire* have provided copies of their responses to counsel for the AWPA, given that counsel for “industrial users” are not eligible for access to these questionnaire responses under the Commission’s administrative protective order.

This prehearing brief on behalf of the AWWPA contains information derived from the experience of the U.S. customer base for carbon and alloy steel wire rod which we hope will assist the Commission in making its determinations in the final phase of these investigations.

In particular, this brief addresses the following issues:

- ◆ The relationship between steel scrap prices and wire rod prices,
- ◆ The continuing pattern of frequent price increases by domestic mills for steel wire rod,
- ◆ The reliance of independent U.S. wire companies on domestic rod mills for the preponderance of their wire rod requirements,
- ◆ The imperative for multiple sourcing for U.S. purchasers of wire rod,
- ◆ The competition between independent AWWPA wire companies and their domestic rod mill suppliers in downstream wire and wire products markets,
- ◆ The importance of non-price factors in the purchasing decisions of independent wire companies,
- ◆ The reasons for the closure of domestic wire rod production by ArcelorMittal and Republic,
- ◆ The inability of the domestic rod mills to produce and supply 1080 tire cord wire rod, and
- ◆ The reasons for the contraction of the domestic market for steel wire rod.

Based on the record in these investigations which includes critical information from U.S. purchasers, the AWWPA urges the Commission to make a negative final determination.

## **II. MOVEMENTS IN THE PRICE OF STEEL SCRAP IN 2014–2015 EXPLAIN DECLINING PRICES FOR WIRE ROD DURING THE PERIOD OF INVESTIGATION**

The importance of the price of steel scrap to the price of wire rod in the United States is clearly stated in the *Prehearing Report*: “U.S. producers and importers stated that wire rod



pricing changes with movements in the scrap market.”<sup>3</sup> Specifically, “{s}even U.S. producers and 17 importers reported reflecting changes in scrap costs in prices for wire rod.”<sup>4</sup> Furthermore,

Three U.S. producers and three importers reported that sales of wire rod are indexed to raw material costs. Three U.S. producers and two importers reported using American Metal Market (“AMM”) as an index for their scrap prices.<sup>5</sup>

Mr. Stauffer of Insteel noted during the Staff Conference in these investigations that:

. . . with monthly pricing negotiations, it’s fair to say that every conversation starts with scrap. . . . 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>6</sup>

Thus, scrap prices are a key indicator of market changes in wire rod prices.

The decisive impact of scrap pricing on domestic mills’ prices for wire rod is not surprising given the role of scrap in the production of wire rod in the United States. As the *Prehearing Report* notes, “{t}he primary raw material input used to produce wire rod using

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<sup>3</sup> *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; Prehearing Report (Public)*; Inv. Nos. 701-TA-573–574 and 731 TA-1349–1358 (Final) (November 2, 2017) (hereinafter “*Prehearing Report*”) at V-3 (emphasis supplied).

<sup>4</sup> *Id.* at V-5.

<sup>5</sup> *Id.* at V-3.

<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 105–106.

the electric arc furnace (“EAF”) production method is steel scrap....”<sup>7</sup> “In the United States, all steel for rod production is melted from ferrous scrap in an EAF....”<sup>8</sup> Thus, for the U.S. rod industry, “raw material costs represent the single largest component of total COGS, at 65.0 percent in 2014, 58.0 percent in 2015, and 55.5 percent in 2016 with similar ratios in the merchant market.”<sup>9</sup>

According to AWWA members, [ ]. The major exception to this is pricing for [ ]. In the case of [ ], steel scrap prices [ ], as shown in CBI Exhibit 1.<sup>10</sup> Between January 2014 and December 2015, [ ] percent and [ ] percent.<sup>11</sup> Then, scrap prices [ ]. Between December 2015 and September 2017,

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<sup>7</sup> *Prehearing Report* at V-1. “Minimills use ferrous scrap as their primary raw material but may add DRI or hot-briquetted iron and/or pig iron, into the mix...” *Id.* at I-18, n. 25.

<sup>8</sup> *Id.* at I-18.

<sup>9</sup> *Id.* at VI-10.

<sup>10</sup> [ ].

<sup>11</sup> See CBI Exhibit 1. The *Prehearing Report* refers to no. 1 busheling scrap, no. 1 heavy melt scrap, and shredded auto scrap, but the data and the source of these data are confidential. See *Prehearing Report* at V-1 and V-2. As counsel for the AWWA, a trade association of industrial users, we are not eligible for APO access, so we cannot comment on the discussion of these scrap prices in the confidential *Prehearing Report*. However, [

] during the period of investigation (“POI”).

[ ] percent and [ ] percent, respectively.<sup>12</sup>

These price trends for steel scrap are likewise reflected in the pricing data that the Commission collected on the six pricing products in these investigations. According to the *Prehearing Report*:

Generally, prices decreased for all pricing products from the beginning of 2014 to the first quarter of 2016. From second quarter of 2016 through the third quarter of 2017, prices for products 2, 3, 4, and 6 mostly increased and prices for products 1 and 5 fluctuated during the same period.<sup>13</sup>

This description indicates that the pricing products showed a declining price trend during the same period—2014 and 2015—that scrap prices were dropping and then increased as scrap rebounded.

AWPA members closely follow steel scrap because changes in scrap prices are a key part of any supply negotiation between purchasers and the U.S. rod mills. As Mr. Stauffer of Insteel explained at the Staff Conference, “The *American Metal Market* usually has their scrap analysis completed by the tenth working day of the month, sometimes sooner.”<sup>14</sup> This scrap price is then used by the U.S. rod mills in wire rod pricing for the subsequent month. Thus, there is a one-month shift when comparing scrap prices and rod prices. This close correlation between the movement of scrap prices and wire rod prices is illustrated graphically in CBI Exhibit 2

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<sup>12</sup> See CBI Exhibit 1. [ ]. *Id.*

<sup>13</sup> *Prehearing Report* at V-27. Again, as counsel to the AWPA, we are not afforded access to the confidential pricing data and therefore cannot comment on the price trends of specific pricing products.

<sup>14</sup> *Transcript* at 105.

which shows [

]. For purposes of illustration, the [

]. The second graph shows the percentage change during the POI [

].<sup>15</sup> The direct correlation is unmistakable and shows clearly that domestic rod prices declined in 2014–2015 as a direct result of declines in the price of steel scrap.

As soon as scrap prices reversed course in 2016, wire rod prices likewise increased—as evidenced by the repeated price increase announcements from the U.S. rod mills in 2016 and 2017.

### **III. THE DOMESTIC WIRE ROD INDUSTRY HAS BEEN IMPOSING AND CONTINUES TO IMPOSE SIGNIFICANT AND FREQUENT PRICE INCREASES ON ALL WIRE ROD PRODUCTS IN 2016–2017**

Throughout 2016 and continuing into late 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. Altogether, U.S. rod mills have raised prices between \$325 and \$415 per short ton since January 2016.<sup>16</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

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<sup>15</sup> See CBI Exhibit 2.

<sup>16</sup> See Exhibit 3.

in April (\$20), May (\$50), June (\$40), and December (\$40).<sup>17</sup> Gerdau's price increases have continued in 2017 with increases for shipments in January (\$45), February (\$45), April (\$45 per ton for low carbon rod and \$60 per ton for high-carbon rod), June (\$20), September (\$10), and October (\$40).<sup>18</sup> Thus, since the beginning of 2016, the price increases for Gerdau's products have totaled \$385 per short ton for low-carbon wire rod and \$400 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>19</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 wire rod and \$60 per ton for high-carbon wire rod for April shipments.<sup>20</sup> Since February 2016, Keystone's total price increases have been \$400 for a short ton of low-carbon wire rod products and \$415 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>21</sup> Like Gerdau and Keystone, Nucor announced price increases constantly throughout 2016 and 2017. For Nucor's Arizona plant, the total price increases during this period amounted to \$385 per short ton for

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

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

<sup>19</sup> *Id.*

<sup>20</sup> *Id.*

<sup>21</sup> *Id.*

low-carbon wire rod and \$410 per short ton for high-carbon wire rod.<sup>22</sup> For Nucor’s Connecticut location, the figures were \$325 per short ton for low-carbon wire rod and \$350 per short ton for high-carbon wire rod.<sup>23</sup> For Nucor’s mill in Nebraska, prices were increased by \$355 per short ton for low-carbon wire rod and \$380 per short ton for high-carbon wire rod.<sup>24</sup> Finally, for Nucor’s South Carolina facility, price increases since January 2016 were \$365 per short ton for low-carbon wire rod and \$390 per short ton for high-carbon wire rod.<sup>25</sup> Thus, Nucor’s prices increase announcements have amounted to \$325-\$385 per short ton for low-carbon wire rod and \$350-\$410 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 busheling.<sup>26</sup>

The publicly available information in the *Prehearing Report* regarding the pricing of individual wire rod products confirms that there were significant price increases during the latter part of the period of investigation—starting before the petitions were filed and continuing into the third quarter of 2017. For example, the unit price of Product 1 increased from \$438 per short ton in the first quarter of 2016 to \$549 per short ton in the third quarter of 2017—

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<sup>22</sup>

*Id.*

<sup>23</sup>

*Id.*

<sup>24</sup>

*Id.*

<sup>25</sup>

*Id.*

<sup>26</sup>

*See 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 on behalf of American Wire Producers Association* (April 24, 2017) (hereinafter, “AWPA Postconference Brief”) at CBI Exhibit 8.

an increase of 25.3 percent.<sup>27</sup> Similarly, the unit price of Product 2 increased from \$446 per short ton in the first quarter of 2016 to \$570 per short ton in the third quarter of 2017—an increase of 27.8 percent.<sup>28</sup> Finally, the unit price of Product 3 increased from \$439 per short ton in the first quarter of 2016 to \$560 per short ton in the third quarter of 2017—an increase of 27.6 percent.<sup>29</sup>

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

Independent U.S. manufacturers of steel wire and wire products source the vast majority of their wire rod requirements from the domestic industry, including Petitioners. The responses of members of the American Wire Producers Association (“AWPA”) to the *U.S. Purchasers’ Questionnaire* show that they procure about three quarters of their wire rod requirements from domestic sources.<sup>30</sup> For example, four of the largest American purchasers of wire rod—

[

] collectively purchase approximately one million tons of wire rod annually, and they purchased [ ] percent of their wire rod needs from U.S. mills in 2016 and [ ] percent from U.S. mills during January–September 2017.<sup>31</sup>

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<sup>27</sup> *Prehearing Report* at V-9.

<sup>28</sup> *Id.* at V-11.

<sup>29</sup> *Id.* at V-13.

<sup>30</sup> See Exhibit 4. As noted in the exhibit, AWPA member companies provided copies of their responses to the Commission’s *U.S. Purchasers’ Questionnaire* to counsel for the AWPA.

<sup>31</sup> See *id.*

At the Staff Conference, Insteel Industries, which consumes 450,000 short tons of wire rod annually, stated that it purchases between 70 and 75 percent of its requirements from domestic rod mills.<sup>32</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>33</sup> Both Mid-South Wire and Bekaert 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>34</sup> This sourcing pattern is common throughout the independent 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 independent wire companies to have multiple sources for their primary raw material—wire rod—because it is the essential component in the production of wire and wire products and accounts for such a high percentage of the cost of the finished wire and wire products. As Mr. 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 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. . . .

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<sup>32</sup> *Transcript* at 28.

<sup>33</sup> *Id.* at 33.

<sup>34</sup> *Id.* at 23 and 37–38.



It is not a question of either/or. It is a question of having both sources available to us.<sup>35</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>36</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 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

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<sup>35</sup> *Id.* at 33.

<sup>36</sup> *Id.* at 29.

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>37</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>38</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>39</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>40</sup>

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<sup>37</sup> *Id.* at 24–25.

<sup>38</sup> *Id.* at 31.

<sup>39</sup> *Id.* at 31–32.

<sup>40</sup> *Id.* at 106.

Mr. Moffitt of Heico noted that “[t]oday, lead times from the domestic mills, which had been four to six weeks, have been stretched to six to eight weeks.”<sup>41</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>42</sup>

Another AWWA member, [ ], was told by Petitioner [ ] that deliveries of contracted purchases had to be pushed back because the mill was filling up.<sup>43</sup> Another domestic mill—Petitioner [ ]—informed [ ] that it cannot accommodate any increases in [ ] historic quantities of purchases, and Petitioner [ ] informed [ ] in late October that it was full for the rest of 2017.<sup>44</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>45</sup> Yet at the conference,

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<sup>41</sup> *Id.* at 35.

<sup>42</sup> *Id.* at 40.

<sup>43</sup> *See* CBI Exhibit 5.

<sup>44</sup> *See id.*

<sup>45</sup> *See AWWA Postconference Brief* at Exhibit 12.

Keystone's Vice President for Sales tried to minimize the effect of delays in supplying customers by claiming that:

{D}uring 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>46</sup>

However, [ ]. In that instance, [ ].<sup>47</sup>

The Director of Marketing for Gerdau also sought to 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>48</sup>

But it is a fundamental problem for independent wire producers that are counting on the delivery of their orders to meet their obligations to their customers. "Blips" like these have significant adverse effects on the operations of wire companies.<sup>49</sup> As Mr. Moffitt of

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<sup>46</sup> *Transcript* at 170. At the preliminary conference, counsel for Nucor also attempted to downplay the adverse effects of outages on wire rod purchasers, but the evidence submitted by independent wire companies that have to deal with the real world consequences of delayed or cancelled rod orders belies that facile observation.

<sup>47</sup> *See AWPB Postconference Brief* at Exhibit 11.

<sup>48</sup> *Transcript* at 172.

<sup>49</sup> *See AWPB Postconference Brief* at Exhibit 14.

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>50</sup>

**V. MOST OF THE DOMESTIC WIRE ROD MILLS ARE VERTICALLY INTEGRATED AND COMPETE DOWNSTREAM WITH THEIR 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—or supply their affiliates—to produce downstream 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 independent wire companies that have no affiliated source of wire rod.

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 rod 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>51</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

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<sup>50</sup>

*Transcript* at 35.

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*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.

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>52</sup>

In this investigation, the Commission asked purchasers to respond to the following question: “did your firm purchase wire rod from a wire rod producer that also produces the same end use products made by your firm?”<sup>53</sup> The response from AWWA members was overwhelmingly “YES.” The Commission also asked purchasers to identify the wire rod producer and the end use products involved, as well as for an estimate of the share of the purchaser’s total 2016 wire rod purchases that were purchased from the wire rod suppliers with whom they compete. Attached as Exhibit 6 is a summary of the responses of numerous AWWA member companies who identified their most significant wire products and the petitioning rod mills with whom they are forced to compete every day. In many cases, these wire companies reported having to compete with all four of the Petitioners at the same time as they also had to rely on these rod mills to supply them with their primary raw material for their wire operations.

Petitioners actively promote on their websites the wire and wire products that they and their affiliates produce in the United States.

- ♦ **Gerdau** reports that its 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.”<sup>54</sup>

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<sup>52</sup> *Id.* at n. 49.

<sup>53</sup> *See U.S. Purchasers’ Questionnaire* at III-4(b).

<sup>54</sup> *See AWWA Postconference Brief* at Exhibit 3.

- ♦ **Keystone Steel & Wire** highlights its production of industrial wire and agricultural fencing on its website.<sup>55</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>56</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>57</sup> Keystone also recently acquired Strand Tech Martin—a producer of pre-stressed concrete (“PC”) strand and formerly an independent wire drawer.
  
- ♦ **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>58</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.
  
- ♦ **Charter Steel** also produces wire rod and wire products, although its website does not provide many details about the end uses of its wire. However, Charter Steel has a sister division—Charter Wire—which is “a major supplier of precision wire products.”<sup>59</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 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 AWPAs members who appeared at the Staff Conference spoke repeatedly about this important condition of competition. Chris Stauffer of Insteel Industries—a wire company

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<sup>55</sup> See *id.* at Exhibit 4.

<sup>56</sup> *Id.*

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

<sup>58</sup> See *id.* at CBI Exhibit 5.

<sup>59</sup> See *id.* at Exhibit 6.

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 throughout the United States in every geographic area.”<sup>60</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>61</sup> Both of these witnesses also expressed concerns about rod availability from domestic mills with whom they compete. As Mr. Johnson explained:

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>62</sup>

According to the *Prehearing Report*, the U.S. rod industry reported an increased quantity of internal consumption and transfers of wire rod to affiliates between 2014 and 2016.<sup>63</sup>

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<sup>60</sup> *Transcript* at 30.

<sup>61</sup> *Id.* at 24.

<sup>62</sup> *Id.* at 24. *See also id.* at 30 (Insteel). 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>63</sup> *See Prehearing Report* at VI-4.



**VI. NON-PRICE FACTORS PLAY A PREDOMINANT ROLE IN THE PURCHASING DECISIONS OF INDEPENDENT U.S. WIRE AND WIRE PRODUCTS MANUFACTURERS**

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 a supplier's wire rod in their operations.<sup>64</sup>

As the *Prehearing Report* notes:

The most often cited top three factors firms consider in their purchasing decisions for wire rod were price (36 firms), quality (35 firms), and availability and supply (17 firms).<sup>65</sup>

In fact:

Quality was the most frequently cited first-most important factor (cited by 19 firms), followed by price (12 firms); quality was {also} the most frequently reported second-most important factor (15 firms); and availability was the most frequently reported third-most important factor (13 firms each)."<sup>66</sup>

Other factors affecting purchasing decisions are product consistency, customer-supplier relationships, the availability of certain specifications and grades, delivery methods and times, and credit and payment terms.<sup>67</sup>

Moreover, as the wire company witnesses testified at the Staff Conference, the cost of the wire rod versus its price is an important distinction in their purchasing decisions.

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<sup>64</sup> See Exhibit 7.

<sup>65</sup> See *Prehearing Report* at II-13.

<sup>66</sup> *Id.*

<sup>67</sup> *Id.* at II-14–II-15.

Mr. Moffitt, Vice President of Purchasing for the Heico Wire Group—the largest purchaser of wire rod in western North America and one of the largest purchasers in the United States—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>68</sup>

Mr. Hughes, Director of Procurement for Bekaert Corporation, concurred that “the total cost of ownership” is an important factor in purchasing wire rod.<sup>69</sup> Mr. Stauffer, Vice President of Sourcing and Logistics for Insteel Industries Inc., 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>70</sup>

Mr. Johnson of Mid-South Wire—a company which purchases 200,000 tons of wire rod annually—noted similar considerations in his company’s purchasing decisions.<sup>71</sup> In particular, 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>72</sup> Mid-South’s largest plant is located on the Cumberland River so the company prefers to purchase wire rod in 1,500-ton quantities to be delivered by barge.<sup>73</sup> Each barge carries the equivalent of 75 truckloads of wire rod, and it takes only

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<sup>68</sup> *Transcript* at 33–35 (emphasis supplied).

<sup>69</sup> *Id.* at 40.

<sup>70</sup> *Id.* at 28.

<sup>71</sup> *Id.* at 25–27.

<sup>72</sup> *Id.* at 25–27.

<sup>73</sup> *Id.* at 26. According to Mid-South, all of its imported wire rod arrives by barge, whereas only two domestic mills can deliver wire rod to Mid-South by barge.

four hours to unload a barge.<sup>74</sup> By contrast, marshalling and unloading 75 trucks in Mid-South's receiving yard takes considerably more time and manpower, and the entire process leaves a much higher carbon footprint.<sup>75</sup> Thus, there are real cost savings and environmental benefits to receiving deliveries of wire rod by barge—an important factor which affects the total cost of wire rod.<sup>76</sup>

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

During the 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>77</sup> although they cite no evidence that links the shuttering of these mills to the subject imports in this case. News accounts and contemporaneous correspondence with customers reveal that these closures were caused by factors other than subject imports of steel wire rod.

### **A. ARCELORMITTAL'S MILL IN GEORGETOWN, SOUTH CAROLINA, 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.

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<sup>74</sup>

*Id.*

<sup>75</sup>

*Id.*

<sup>76</sup>

*Id.*

<sup>77</sup>

*See id.* at 19, 120, 134, and 140.

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 the DRI 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>78</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 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>79</sup>

Local news stories regarding the fate of the steel mill site and the Georgetown port confirm the accounts by these customers. In one article, the mayor of Georgetown explained that it was "not feasible" to operate a maritime facility in Georgetown because:

The fast-silting harbor makes it difficult for ships to visit the port and it will take \$66 million—money the federal government says

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<sup>78</sup> *Id.* at 83–84.

<sup>79</sup> *Id.* at 85.

it doesn't have—to deepen the channel to its maximum 27-foot depth.<sup>80</sup>

Prior to the public announcement of the mill closure in May 2015, [

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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. 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

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<sup>80</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 AWPB Postconference Brief* at Exhibit 26.

<sup>81</sup> *See* CBI Exhibit 8.

<sup>82</sup> *Id.*

helped Georgetown in Georgetown, South Carolina, close its doors.<sup>83</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.

**B. REPUBLIC STEEL'S MILL IN LORAIN, OHIO, WAS IDLED IN MARCH 2016**

Contemporaneous news accounts regarding the idling of Republic's Lorain mill confirm that it was the decline in the oil and gas markets and the hyper-competitive SBQ market for automotive—not wire rod imports—that caused Republic to idle its rolling mill operations in Lorain in March 2016.

One source reported that Republic's Lorain mill had previously supplied input material for U.S. Steel's Tubular Operations which are located adjacent to the Lorain mill:

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>84</sup>

The impact of 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

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<sup>83</sup> *Transcript* at 85–86.

<sup>84</sup> *See AWP A Postconference Brief* at Exhibit 22.

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>85</sup>

This same news report indicated that after losing the business supplying steel bar to US Steel's Tubular Operations, Republic's Lorain facility was producing special bar quality steel for the automotive industry. But the president of the USW local explained that, although the auto industry was doing well, it was "very, very competitive so orders {for SBQ steel} have been slim for the Lorain plant."<sup>86</sup> Thus, the reasons for Republic Steel's decision to idle its Lorain plant appear to have nothing to do with subject imports of wire rod or competition in the U.S. wire rod market.

As these news accounts indicate, Republic is known primarily as a bar mill, although the Lorain mill does produce large diameter CHQ rod. In [

].<sup>87</sup> Thus, the smallest diameter rod available from Republic's Lorain mill is 0.297.<sup>88</sup> This means that Republic is not capable of producing standard wire rod sizes such as 7/32 (.219), 1/4 (.250) and 9/32 (.281), which are large volume diameters used by the IQ and

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<sup>85</sup> See *id.* at Exhibit 23.

<sup>86</sup> See *id.* at Exhibit 22.

<sup>87</sup> See CBI Exhibit 9.

<sup>88</sup> See *id.*



standard mesh rod consuming industry in the United States.<sup>89</sup> As a large diameter CHQ mill, Republic [ ].

**C. BOTH THE GEORGETOWN MILL AND REPUBLIC’S LORAIN MILL MAY BE RETURNING TO PRODUCTION**

In April 2017, ArcelorMittal announced that it had found a potential buyer for the steel mill in Georgetown. Liberty House, a London-based international metals and industrial group, indicated that it intended to purchase the site and reopen the rod mill.<sup>90</sup> As recently as August 2017, Liberty House reported that it was close to completing a deal for the purchase of the Georgetown rod mill, and the USW announced that it had finalized a labor agreement with Liberty House Group to reopen the mill.<sup>91</sup> Another news source recently reported that “Liberty House is aware of the mill’s history and is ready to dive into the troubled property anyway.”<sup>92</sup>

In [ ], Republic Steel has indicated that [ ]

[ ].<sup>93</sup> In [ ]

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<sup>89</sup> When [ ]

[ ].

<sup>90</sup> See Exhibit 10.

<sup>91</sup> See Exhibit 11.

<sup>92</sup> See Exhibit 12.

<sup>93</sup> See CBI Exhibit 9.

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<sup>94</sup>  
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**VIII. ALTHOUGH THE U.S. WIRE ROD INDUSTRY DOES NOT MAKE TIRE CORD WIRE ROD IN GRADE 1080 AND ABOVE AND NO U.S. ROD MILLS ARE QUALIFIED TO MAKE IT DESPITE EFFORTS TO DO SO, THESE PRODUCTS ARE INCLUDED IN THE SCOPE OF THESE INVESTIGATIONS, AND THIS THREATENS PLANNED INVESTMENTS TO MEET GROWING DEMAND IN THE AUTOMOTIVE SECTOR**

At the Staff 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 wire and the other for tire bead wire. 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 the tire.<sup>95</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 somewhat less complicated by comparison.<sup>96</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. Hughes, Director of

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<sup>94</sup> See CBI Exhibit 9.

<sup>95</sup> See *AWPA Postconference Brief* at Exhibit 16.

<sup>96</sup> *Id.*

Procurement of 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>97</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>98</sup> Mr. 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>99</sup> Mr. Minnick also reported that over the past four years, seven new tire factories have been built in the United States.<sup>100</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>101</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, which 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:

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<sup>97</sup> *Transcript* at 38.

<sup>98</sup> *Id.* at 180.

<sup>99</sup> *Id.* at 41.

<sup>100</sup> *Id.* at 95.

<sup>101</sup> *Id.* at 43–44.

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>102</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>103</sup> BOF material is only available from mills outside the United States; rod mills in Korea, South Africa, Turkey, Ukraine, and the United Kingdom produce wire rod using the BOF process (although not all of these sources are capable of producing tire cord wire rod).<sup>104</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>105</sup> He also noted that:

Each time we want to qualify a new rod supplier, Bekaert has to requalify itself with the tire manufacturers. This process is

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<sup>102</sup> *Id.* at 38.

<sup>103</sup> *Id.* at 25, 39, 43, 45, and 68.

<sup>104</sup> *Id.* at 39.

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

not only time-consuming but also expensive for all parties involved.<sup>106</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>107</sup>

At the Staff Conference, both Mr. Hughes of Bekaert and Mr. Minnick of Kiswire reported that they had no mill qualified domestically to supply 1080 tire cord wire rod, despite efforts by both to qualify a domestic mill.<sup>108</sup> Mr. Minnick testified that Kiswire's facility in Pine Bluff, Arkansas—which was previously owned by ArcelorMittal—tried to qualify ArcelorMittal's rod mill in Georgetown, South Carolina, but:

That 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>109</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>110</sup>

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<sup>106</sup> *Id.* at 40.

<sup>107</sup> *Id.* at 42.

<sup>108</sup> *Id.* at 108–109.

<sup>109</sup> *Id.* at 42.

<sup>110</sup> *Id.* at 45–46.

When Petitioners were asked whether any U.S. wire rod producers make 1080 grade tire cord wire rod, Mr. Ashby of Keystone reported that his company produces 1080 grade wire rod for PC strand applications and that the mill also makes tire bead wire rod, but it does not make 1080 tire cord wire rod.<sup>111</sup> Mr. Canosa of Gerdau similarly responded that his company makes 1080 grade wire rod generally but not 1080 tire cord wire rod.<sup>112</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 1080 bead wire rod.<sup>113</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>114</sup> However, [

].<sup>115</sup>

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

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<sup>111</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>112</sup> *Id.* at 155.

<sup>113</sup> *Id.* at 155 and 157.

<sup>114</sup> *See AWPB Postconference Brief* at Exhibit 20.

<sup>115</sup> *See id.* at Exhibit 21.

**IX. THE DOMESTIC MARKET FOR STEEL WIRE ROD HAS CONTRACTED SIGNIFICANTLY, LARGELY AS THE RESULT OF PREVIOUS TRADE ACTIONS AGAINST IMPORTED WIRE ROD**

One of the greatest changes 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 contraction 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 wire rod imports from twelve countries, which resulted in orders against seven countries.<sup>116</sup> The decline in consumption—which has been accompanied by a similar decline in production of wire rod by the domestic industry—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.

This change is noticeable when comparing consumption during the periods prior to the previous series of antidumping and countervailing duty cases against wire rod in 2001 with current levels. Prior to 2001, U.S. apparent consumption of wire rod was between 8.3 and 8.5 million short tons annually.<sup>117</sup> The domestic rod mills benefitted from this large market by producing about 5.5 million tons of rod annually—satisfying two-thirds of U.S. consumption.<sup>118</sup>

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<sup>116</sup>

The seven countries are Brazil, Canada, Indonesia, Mexico, Moldova, Trinidad and Tobago, and Ukraine. *See Carbon and Certain Alloy Steel Wire Rod From Brazil, Canada, Germany, Indonesia, Mexico, Moldova, Trinidad and Tobago, Turkey, and Ukraine*, Inv. Nos. 701-TA-417–421 and 731-TA-953, 954, 956–959, 961, and 962 (Final), USITC Pub. 3546 (October 2002); *Carbon and Certain Alloy Steel Wire Rod From Brazil, Canada, Egypt, Germany, Indonesia, Mexico, Moldova, South Africa, Trinidad and Tobago, Turkey, Ukraine, and Venezuela*, Inv. Nos. 701-TA-417–421 and 731-TA-953–963 (Preliminary), USITC Pub. 3456 (October 2001).

<sup>117</sup>

*See* Exhibit 13.

<sup>118</sup>

*Id.*

However, by 2016 and 2017, U.S. consumption had declined to 5.3 to 5.8 million short tons—about two-thirds of pre-2001 levels.<sup>119</sup> The loss of such a significant part of its market has had a dramatic impact on the domestic rod industry because its annual production levels are now 3.8 million short tons, or about 70 percent of pre-2001 levels.<sup>120</sup>

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 rod mills. As Kimberly Korbel, AWWA Executive Director, explained during the Staff Conference in these investigations:

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>121</sup>

Because wire producers do not have access to global sourcing of wire rod as the result of trade orders, they cannot compete with imported wire produced from such rod which means that domestic rod producers lose tonnages from customers who buy less wire rod. This effect is demonstrated in Exhibit 14, which shows the changes in import levels of four representative wire products manufactured by members of the AWWA.<sup>122</sup> Aggregate imports of these products increased from just over one million short tons in 2000—before the previous series of trade cases against multiple countries—to more than 1.6 million tons in 2016. On just these four wire

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<sup>119</sup>

*Id.*

<sup>120</sup>

*Id.*

<sup>121</sup>

*Transcript* at 21.

<sup>122</sup>

*See* Exhibit 14.



products, the domestic rod industry has lost more than 600,000 tons of wire rod sales annually.<sup>123</sup>

One example of the negative impact that trade cases on rod have had on the industry that brought them was discussed at the Staff 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 abroad 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 United States as a finished wire product,<sup>124</sup> not only from that country but from third countries as well.

There is also a further down streaming 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

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<sup>123</sup>

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 these downstream products. However, very few segments of the wire and wire products markets are conducive to the filing of antidumping or countervailing duty petitions due to the small size of many of these domestic industries and the cost of such filings.

<sup>124</sup>

*Transcript* at 36–37.

the United States.”<sup>125</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 succumbed to imports. They include such American icons as the barbecue grill industry, wire decking, and a myriad of consumer products.<sup>126</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.

## **X. CONCLUSION**

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

Respectfully submitted,

/ s / Frederick P. Waite

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*Counsel for AMERICAN WIRE PRODUCERS ASSOCIATION*

November 13, 2017

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<sup>125</sup> *Id.* at 23–24.

<sup>126</sup> *Id.* at 24.

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*Confidential Business Information Has Been Deleted  
from Exhibits 4, 6 and 7; and CBI Exhibits 1, 2, 5, 8  
and 9 Have Been Omitted from This Prehearing 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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<b>IN THE MATTER OF THE ANTIDUMPING AND COUNTERVAILING DUTY INVESTIGATIONS OF:</b>	
<b>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</b>	<b>USITC INV. NOS. 701-TA-573—574 AND 731-TA-1349—1358 (FINAL)</b>

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**EXHIBITS**

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

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*COUNSEL:*

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Dated: November 13, 2017

**EXHIBIT LIST**

EXHIBIT 1	MONTHLY SCRAP PRICES	Confidential Business Information ("CBI") Exhibit
EXHIBIT 2	MOVEMENT OF SCRAP PRICES AND WIRE ROD PRICES	CBI Exhibit
EXHIBIT 3	PRICE INCREASE ANNOUNCEMENTS (2016–2017)	Public Exhibit
EXHIBIT 4	AWPA MEMBERS SOURCING OF WIRE ROD PURCHASES	CBI/Public Versions
EXHIBIT 5	DELAYED DELIVERIES AND FULL ORDER BOOKS	CBI Exhibit
EXHIBIT 6	U.S PURCHASERS COMPETE WITH DOMESTIC ROD SUPPLIERS	CBI/Public Versions
EXHIBIT 7	AWPA MEMBERS MAJOR PURCHASING FACTORS	CBI/Public Versions
EXHIBIT 8	GEORGETOWN STEEL MILL CLOSURE (MAY 2015)	CBI Exhibit
EXHIBIT 9	REPUBLIC'S LORAIN MILL	CBI Exhibit
EXHIBIT 10	NEWS ARTICLE ON GEORGETOWN MILL (APRIL 2017)	Public Exhibit
EXHIBIT 11	NEWS ARTICLES ON GEORGETOWN MILL (AUGUST 2017)	Public Exhibit
EXHIBIT 12	NEWS ARTICLE ON GEORGETOWN MILL (AUGUST 2017)	Public Exhibit
EXHIBIT 13	U.S. CONSUMPTION AND DOMESTIC PRODUCTION OF STEEL WIRE ROD	Public Exhibit
EXHIBIT 14	U.S. IMPORTS OF CERTAIN STEEL WIRE PRODUCTS FROM ALL SOURCES	Public Exhibit

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

This Confidential Business Information (“CBI”) Exhibit  
Is Entirely Confidential, Completely Bracketed,  
and Has Been Omitted from the Public Version.

# **CBI EXHIBIT 1**

## **MONTHLY 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**THE INFORMATION IN THIS CBI EXHIBIT  
IS NOT SUSCEPTIBLE TO PUBLIC SUMMARY.**

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and Has Been Omitted from the Public Version.

## **CBI EXHIBIT 2**

### MOVEMENT OF SCRAP PRICES AND WIRE ROD 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

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This Public Exhibit Does Not Contain Confidential Business Information.

## **EXHIBIT 3**

### PRICE INCREASE ANNOUNCEMENTS (2016–2017)

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**PRICE INCREASE ANNOUNCEMENTS  
BY  
DOMESTIC ROD MILLS**

**JANUARY 2016—SEPTEMBER 2017**

<b>MILL</b>	<b>DATE</b>	<b>ANNOUNCED INCREASE</b>	<b>EFFECTIVE DATE</b>
<b>GERDAU</b>	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
	June 16, 2017	\$20/ton on all rod products	June 16, 2017
	September 19, 2017	\$40/ton on all rod products	October 2, 2017
<b>KEYSTONE</b>	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 6, 2017	No change in price	May 1, 2017
	May 11, 2017	\$30/ton on all rod products	June 1, 2017
	June 15, 2017	\$25/ton on all rod products	July 1, 2017
	September 15, 2017	\$40/ton on all rod products	October 2, 2017
<b>NUCOR —ARIZONA</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 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 9, 2017	\$20/ton on all rod products	April 1, 2017
	March 14, 2017	\$45/ ton on low carbon; \$60/ton on high carbon	April 1, 2017
	April 6, 2017	No change in price	May 1, 2017
	June 15, 2017	\$20/ton on all rod products	June 16, 2017
	September 18, 2017	\$40/ton on all rod products	October 2, 2017

**PRICE INCREASE ANNOUNCEMENTS BY DOMESTIC ROD MILLS**

**JANUARY 2016—SEPTEMBER 2017**

NOVEMBER 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
	June 15, 2017	\$20/ton on all rod products	June 15, 2017
	September 18, 2017	\$40/ton on all rod products	October 2, 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
	June 15, 2017	\$20/ton on all rod products	June 15, 2017
	September 18, 2017	\$40/ton on all rod products	October 2, 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
	June 15, 2017	\$20/ton on all rod products	June 15, 2017
	August 16, 2017	\$10/ton on all rod products	September 1, 2017
	September 18, 2017	\$40/ton on all rod products	October 2, 2017

**PUBLIC EXHIBIT**

**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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017



September 19, 2017

Dear Valued Customer:

Effective with shipments **October 2, 2017** Gerdau Long Steel North America will increase our base pricing on all Wire Rod products by \$40.00/ton (\$2.00/cwt).

Our input costs to produce Wire Rod continue to rise. Gerdau assures you we are monitoring our input costs which are rising globally.

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

Sincerely,

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

**Tampa Office**

4221 W. Boy Scout Blvd, Suite 600 • Tampa, FL 33607  
P. O. Box 31328, Tampa, FL 33631-3328  
(800) 237-0230 • (800) 628-9931 fax  
[www.gerdau.com/longsteel](http://www.gerdau.com/longsteel)



June 16, 2017

Dear Valued Customer:

Effective with new orders on Friday, June 16, 2017 Gerdau is increasing our transaction price on all Wire Rod Products by \$20.00/ton.

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



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', with a stylized flourish at the end.

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 black ink, 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'.

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 EXHIBIT

**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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**Keystone**



**Steel & Wire**

September 15, 2017

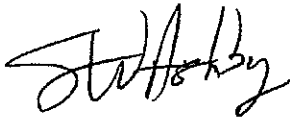
To our valued customers:

Effective with shipments starting October 2, 2017, Keystone Steel & Wire will be implementing a **\$40/ton (\$2.00/cwt.) increase on all Wire Rod products**

While market conditions remain steady, the impact of rising costs is having a significant impact on our business. The main driver in this cost is the global shortage of graphite electrodes used in the steelmaking process. Your Keystone Sales representative will be discussing this with you during the next few days.

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

Sincerely,



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

**Keystone**



**Steel & Wire**

June 15, 2017

To our valued customers:

Keystone Steel will be increasing base prices on wire rod by \$25.00/ton for shipments starting July 1<sup>st</sup>.

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**

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 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

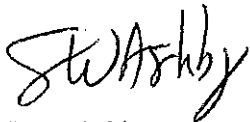
To our valued customers:

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,



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

**Keystone**



**Steel & Wire**

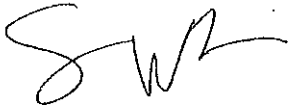
February 16, 2017

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**

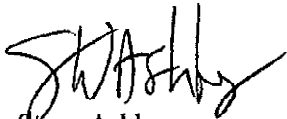
December 14, 2016

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,



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**

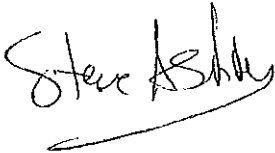
January 14, 2016

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

# **NUCOR**

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**NUCOR STEEL KINGMAN, LLC**

September 18, 2017

Dear Valued Customer:

Effective with shipments October 2, 2017, Nucor Steel - Kingman will increase all Wire Rod Products by \$40.00/T (\$2.00/cwt).

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) 778-0022.

Sincerely,



Dave Olmsted  
Sales Manager  
Nucor Steel - Kingman



June 15, 2017

Dear Valued Customer:

Effective with new orders today, June 15, 2017 we are increasing our transaction price on all Wire Rod Products by \$20.00/Ton.

All confirmed orders as of the close of business on Wednesday, June 14, 2017 will be price protected if shipped before July 28, 2017.

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

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



March 14, 2017

**Dear Valued Customer:**

Effective with shipments April 1, 2017, Nucor Steel - Kingman 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 (855) 718-7836.**

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

Sincerely,

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**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

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

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

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

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

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

September 18, 2017

Dear Valued Customer:

Effective with shipments October 2, 2017, Nucor Steel - CT will increase all Wire Rod Products by \$40.00/T (\$2.00/cwt).

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)221-0323.

Sincerely,



Caleb Strother  
Sales Manager  
Nucor Steel Connecticut



June 15, 2017

Dear Valued Customer:

Effective with new orders today, June 15, 2017 we are increasing our transaction price on all Wire Rod Products by \$20.00/Ton.

All confirmed orders as of the close of business on Wednesday, June 14, 2017 will be price protected if shipped before July 28, 2017.

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 "Caleb".

Caleb Strother  
Sales Manager  
Nucor Steel Connecticut

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

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 large, looped 'B' and a cursive 't'.

Brett Stoler  
Sales Manager  
Nucor Steel Connecticut



**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,

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



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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017



September 18, 2017

Dear Valued Customer:

Effective with shipments October 2, 2017, Nucor Steel – NE will increase all Wire Rod Products by \$40.00/T (\$2.00/cwt).

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.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob".

Rob Colton  
Sales Manager  
Nucor – NE



June 15, 2017

Dear Valued Customer:

Effective with new orders today, June 15, 2017 we are increasing our transaction price on all Wire Rod Products by \$20.00/Ton.

All confirmed orders as of the close of business on Wednesday, June 14, 2017 will be price protected if shipped before July 28, 2017.

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 Nebraska thanks you for your business and appreciates your continued support and cooperation.

Sincerely,

Rob Colton  
Sales Manager  
Nucor – NE

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



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,

A handwritten signature in black ink, appearing to read "Rob".

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,

A handwritten signature in black ink, appearing to read "Rob".

Rob Colton  
Sales Manager – NS-NE

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

September 18, 2017

Dear Valued Customer:

Effective with shipments October 2, 2017, Nucor Steel – South Carolina will increase all Wire Rod Products by \$40.00/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,



Brett Stoler  
Sales Manager  
Nucor Steel South Carolina

August 16, 2017

Dear Valued Customer:

Effective with shipments September 1, 2017, Nucor Steel – South Carolina will increase all Wire Rod Products by \$10.00/ton or (\$0.50/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,



Brett Stoler  
Sales Manager  
Nucor Steel South Carolina



June 15, 2017

Dear Valued Customer:

Effective with new orders today, June 15, 2017 we are increasing our transaction price on all Wire Rod Products by \$20.00/Ton.

All confirmed orders as of the close of business on Wednesday, June 14, 2017 will be price protected if shipped before July 28, 2017.

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 – SC thanks you for your business and appreciates your continued support and cooperation.

Sincerely,



Brett Stoler  
Sales Manager  
Nucor Steel South Carolina

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

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**

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## **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**

---

## **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**

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## **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**

---

## **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**

---

## **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**

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## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

March 9, 2016

Dear Valued Customer:

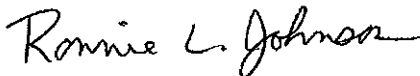
Effective with shipments April 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$20/ton or (\$1.00/cwt.).

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**

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## **BAR MILL GROUP**

SOUTH CAROLINA DIVISION

January 11, 2016

Dear Valued Customer:

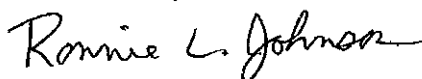
Effective with shipments February 1, 2016, Nucor Steel – South Carolina will increase all Wire Rod products by \$1.50/cwt or \$30/ton.

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

Confidential Business Information Has Been Deleted from This Exhibit.

## **EXHIBIT 4**

### **AWPA MEMBERS SOURCING OF WIRE ROD PURCHASES**

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

## AMERICAN WIRE PRODUCERS ASSOCIATION (“AWPA”) MEMBERS SOURCING OF WIRE ROD PURCHASES

**CALENDAR YEAR 2016 AND JANUARY–SEPTEMBER 2017**

*(All figures are in short tons.)*

[illegible]

Source: *Responses of AWWPA Member Companies to U.S. Purchasers' Questionnaire*, II-1. AWWPA members provided their responses to AWWPA counsel.

This CBI Exhibit Is Entirely Confidential, Completely Bracketed,  
and Has Been Omitted from the Public Version.

## **CBI EXHIBIT 5**

### DELAYED DELIVERIES AND FULL ORDER BOOKS

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**THE INFORMATION IN THIS CBI EXHIBIT  
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Confidential Business Information Has Been Deleted from This Exhibit.

## **EXHIBIT 6**

### **U.S PURCHASERS COMPETE WITH DOMESTIC ROD SUPPLIERS**

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017



U.S. PURCHASERS COMPETE WITH THEIR DOMESTIC ROD SUPPLIERS

AWPA MEMBER COMPANY	TOP THREE PRODUCTS OF AWPA MEMBER COMPANY	COMPETITION WITH PETITIONING U.S. ROD SUPPLIERS ON DOWNSTREAM PRODUCTS	% OF 2016 ROD FROM PETITIONERS	2016 PURCHASES IN SHORT TONS

Source : U.S. Purchasers' Questionnaires at Questions III-4(a) and (b) and II-1(a) (2017).

Confidential Business Information Has Been Deleted from This Exhibit.

## **EXHIBIT 7**

### **AWPA MEMBERS MAJOR PURCHASING FACTORS**

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**AMERICAN WIRE PRODUCERS ASSOCIATION (“AWPA”) MEMBERS**  
**MAJOR PURCHASING FACTORS**

[illegible]

Source: *Responses of AWPAs Member Companies to U.S. Purchasers' Questionnaire*, III-22. AWPAs members provided their responses to AWPAs counsel.

This CBI Exhibit Is Entirely Confidential, Completely Bracketed,  
and Has Been Omitted from the Public Version.

## **CBI EXHIBIT 8**

### **GEORGETOWN STEEL MILL CLOSURE (MAY 2015)**

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

**THE INFORMATION IN THIS CBI EXHIBIT  
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This CBI Exhibit Is Entirely Confidential, Completely Bracketed,  
and Has Been Omitted from the Public Version.

## **CBI EXHIBIT 9**

REPUBLIC'S LORAIN MILL

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

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## **EXHIBIT 10**

### NEWS ARTICLE ON GEORGETOWN MILL (APRIL 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017





#DEALS APRIL 21, 2017 / 7:51 AM / 7 MONTHS AGO

# Liberty House to buy ArcelorMittal's U.S. Georgetown steel plant

Reuters Staff

2 MIN READ



LONDON (Reuters) - Metals group Liberty House Group has agreed to buy the Georgetown Steelworks plant from Arcelor Mittal in its first major U.S. acquisition, the companies said on Friday.





Liberty House to buy ArcelorMittal's U.S.  
Georgetown steel plant



Sky says it could sh  
Q >

London-based Liberty will buy the plant based in South Carolina, including its 540,000 tonne a year electric arc furnace and 680,000 tonne a year rod mill, the joint statement said. It did not disclose the cost of deal.

The Georgetown plant was closed in August 2015 and directly employed more than 320 workers.

“Acquiring the plant at Georgetown, with its ability to recycle scrap steel in an arc furnace, gives us a strong platform from which to launch our strategy in the USA,” said Liberty House executive chairman Sanjeev Gupta.

The provisional deal marks the “first significant step in Liberty’s plan to make major investments in the U.S. steel industry”, the statement said.

Liberty House was in talks with the United Steelworks union on recruiting a workforce to re-open the plant.

ArcelorMittal said in February that it expected apparent steel consumption in the United States and in Brazil to rise 4 percent this year.

Reporting by Zandi Shabalala, editing by David Evans

Our Standards: [The Thomson Reuters Trust Principles.](#)

This Public Exhibit Does Not Contain Confidential Business Information.

# **EXHIBIT 11**

## **NEWS ARTICLES ON GEORGETOWN MILL (AUGUST 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

Promotion

**Click here for introductory subscription savings.**

[http://www.postandcourier.com/business/liberty-house-says-it-s-closing-in-on-georgetown-steel/article\\_c78fca1c-7c43-11e7-9232-036e17368909.html](http://www.postandcourier.com/business/liberty-house-says-it-s-closing-in-on-georgetown-steel/article_c78fca1c-7c43-11e7-9232-036e17368909.html)

TOP STORY

## Liberty House says it's closing in on Georgetown steel mill purchase

By David Wren [dwren@postandcourier.com](mailto:dwren@postandcourier.com) Aug 8, 2017



The Georgetown steel mill, which has found a tentative buyer in London-based Liberty House Group, has been idled since August 2015. File/Grace Beahm/Staff

**Buy Now**

The U.K. metals manufacturer that wants to buy the shuttered Georgetown steel plant is weeks from closing on the transaction, a spokesman told The Post and Courier, but the company is worried that a plan to rezone the property might scuttle the deal.

"It's been a long journey to get here, but we're very close to the end," said Gordon Spelich, spokesman for London-based Liberty House Group, which plans to buy the mill from ArcelorMittal for an undisclosed price. "We're moving forward with everything we need to do to get to the closing."

An ArcelorMittal spokeswoman did not respond to a request for comments.

Liberty House met last week with the United Steelworkers to begin drafting a work agreement with the union, which Spelich said should be finalized in a couple of weeks.

And concerns over the Port of Georgetown's ability to handle shipments of material to the mill have subsided, with assurances that barges can still navigate the fast-silting harbor.

The potential rezoning, however, would be a "show stopper," Spelich said.

Georgetown City Council has tentative plans to rezone the steel mill site away from heavy industrial use when it meets Aug. 17, although a final agenda won't be set until later this week. The city has worked with consultants on a plan to transform the property into a mix of housing, light industry and offices since ArcelorMittal shut down the facility two years ago.

Georgetown Mayor Jack Scoville said the city wants Liberty House to reopen the mill and would like to grandfather the company's use of the site into any rezoning plan. But if the mill closes again with Liberty House at the helm, that's it.

"We're not trying to impede the reopening," Scoville said, adding that the rezoning would let the city move ahead with redevelopment if Liberty House ever ceases production for more than a year.

"The mill has closed three times in the past decade and, quite frankly, there is a lot of uncertainty in the steel market," Scoville said. "Experts we've talked to say they are not optimistic about its success."

Spelich said any rezoning, including one with a grandfather clause, worries him.

"If we restart the facility successfully and things are going well, we don't want anything to impair our ability to run the facility and make money," he said. That includes a possible future sale to another steelmaker, which might not be allowed if the property is rezoned.

Scoville and Spelich said they plan to meet with other city officials next week to talk about plans for the site and the rezoning ultimately might not make it on the council's agenda.

James Sanderson, the local steelworkers' union president, has called a news conference for Wednesday afternoon to put pressure on city officials to delay the rezoning.

Meanwhile, Spelich said he met last month with Georgetown County and South Carolina officials to discuss incentives Liberty House might qualify for if it reopens the steel mill. Those would include tax credits for creating jobs and paying a reduced fee instead of property taxes to the county.

"We are just trying to get whatever is available to assist us in the restart," he said. "They want some additional information from us, and we're working on that now."

Brian Tucker, the county's economic development director, said the discussions are in "the very preliminary stages."

Adrienne Fairwell, spokeswoman for the S.C. Commerce Department, said Liberty House has not applied for any incentives through the Coordinating Council for Economic Development, but any discussions between the parties would be confidential.

Spelich also met with the State Ports Authority to talk about using the Georgetown port to transport materials to the mill site. Spokeswoman Erin Dhand said the authority told Spelich that the port "remains open for both warehousing and barge/vessel traffic" but is limited by its current 18-foot depth.

While Liberty has said it would like to see the port's harbor eventually dredged to its normal 27-foot depth, Dhand said "there is no real hope" that will happen because of the expense and lack of a funding source. She said the SPA also continues to talk with Georgetown officials about redevelopment of the port site, which is located adjacent to the steel mill.

Georgetown's port handled a record 1.68 million tons of cargo at its height in fiscal 1999, with shipments of wire rods produced at the steel mill accounting for more than half of that total. During the past fiscal year, which ended June 30, the Georgetown port handled about 7,400 tons of cargo.

Spelich said Liberty House would send scrap iron and other materials to Georgetown by barge from shipments made to deep-water ports in either Charleston or Wilmington, N.C.

Luxembourg-based ArcelorMittal, the world's largest integrated steel and mining company, has owned the Georgetown steel plant in some form since 2004.

Liberty House Group operates steel and aluminum factories in the United Kingdom, Middle East and Asia. The company has been on a buying spree in recent months, announcing plans to acquire a shipbuilding business in India, an automotive engine manufacturer in Europe as well as Tata Steel sites in the United Kingdom.

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# Union: Georgetown Steel Mill to reopen 'very soon'

*Published: Wednesday, August 9th 2017, 4:39 pm EST*  
*Updated: Wednesday, August 9th 2017, 8:04 pm EST*

By Live 5 News Web Staff [CONNECT](#)

By Alexis Simmons, Reporter/MMJ [CONNECT](#)

GEORGETOWN, SC (WCSC) - Representatives with United Steelworkers say they are confident the reopening of the Georgetown steel mill is imminent.

The union held a news conference in Georgetown to announce it had finalized a labor agreement with London-based Liberty House Group to reopen the mill. Meetings recently held in Pittsburgh led to the agreement, union officials said.

Many residents in the area are in favor of the steel mill reopening.

Georgetown resident, Thomas Herman, says three of his brothers worked at the ArcelorMittal mill before it closed.

"I think if they opened back again, we'd all be a happy camper, that's more work coming here," Herman said.

Georgetown resident Denise Austin says she would be interested in working there in the future.

She drives an hour to work in Mount Pleasant because of the lack of options for her in the city she lives.

"The pay is horrible down here in certain locations and stuff, so I believe it would be a good thing," Austin said.

President of the United Steelworkers James Sanderson says he felt it was necessary to give the community an update on the plans for the site.

"I promise you that steel mill will open very soon," Sanderson said.

They also say the closing on the sale of the mill from ArcelorMittal to Liberty House Group, which had experienced numerous delays since it was announced in April, is also expected to happen in the very near future.

An official with the Liberty House Group also says they are very close to having the contract completed.

They say once the contract is completed it will take about 10 to 12 weeks to restart operations.

The mill closed in 2015 and more than 200 people lost their jobs.

At one point earlier this year, the city considered redeveloping the space into a mix-use recreational space.

The remaining concern of the union is if Georgetown City Council will look to rezone the property from heavy industrial to mixed-use, thereby jeopardizing the plan to reopen the mill.

Mayor candidate and current council member Brendon Barber supports the reopening plans.

He was at the news conference along with State Representative Carl Anderson who is also in support of the mill reopening.

"If we vote to rezone we would be sending the wrong message," Barber said.

The old steel mill opened in 1969, running 47 years before closing its doors in the summer of 2015.

If the mill reopens, it could add up to 300 jobs back into the Georgetown economy.

"That steel mill helped a lot of people around here and out of Georgetown County, because there was a whole lot of people working at that plant. The people who were working there were doing well," Herman said.

Liberty House Group says they intend on rehiring workers from Georgetown.

They have also been working closely with the current property owners to spruce up the space.

So far Liberty House Group has led the efforts to repaint the mural that welcomes drivers into Georgetown.

It has not been determined if Georgetown City Council will discuss rezoning the steel mill property next week because the agenda for the council meeting has not been finalized, according to the acting city administrator.

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## **EXHIBIT 12**

### NEWS ARTICLE ON GEORGETOWN MILL (AUGUST 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

August 18, 2017

# ArcelorMittal Steel Mill Splits Small Southern Town



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By [Jaclyn Diaz](#)

Heavy industry or hospitality jobs? Town leaders, a local union, and two companies are at odds over the planned reopening of a steel mill in a small South Carolina harbor town, where some would prefer to see shops and restaurants.

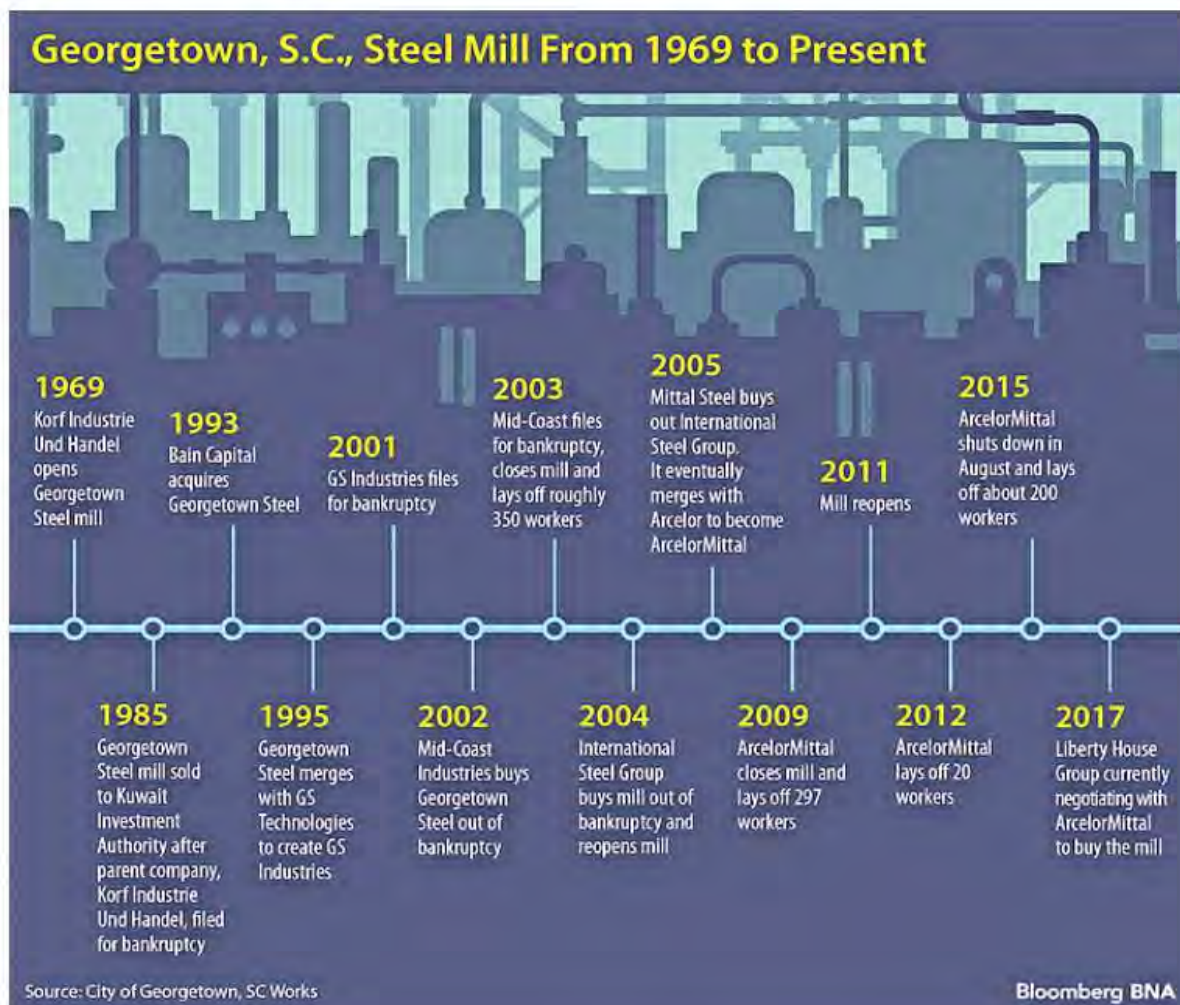
The 48-year-old Georgetown mill has kept residents and workers on a roller coaster for years, and some city leaders are ready to get off, sources told Bloomberg BNA in recent interviews.

Plagued by bankruptcies, layoffs, and repeated shutdowns over the past 12 years, the 600,000-square-foot mill closed in 2015 for what was thought to be the last time, Mayor Jack Scoville told

Bloomberg BNA. As the facility lay dormant, the city began looking at redevelopment options.

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But a tentative deal between two major steel companies may reopen the mill. That news has divided city residents.

Those in favor of redevelopment think Georgetown should move away from its reliance on manufacturing. Others think Georgetown was built on heavy industry and should stay that way.

#### ArcelorMittal, Liberty House Negotiating Purchase

Liberty House Group, a London-based steel producer, reached a tentative agreement in April to purchase the facility from ArcelorMittal. The two sides are still negotiating, spokesmen for both companies told Bloomberg BNA.

The deal is expected to create more than 300 jobs, and former steelworkers are ready to get back to work, James Sanderson, the president of United Steelworkers Local 7898, told Bloomberg BNA. The local negotiated a tentative deal with Liberty House in the event it opens the mill.

Local 7898 represented the ArcelorMittal workers, some of whom went to work at a nearby paper mill while others moved to the company's plants in Cleveland and Burns Harbor, Ind., Sanderson said.

Some people in Georgetown aren't optimistic that Liberty House can succeed where others have failed. They're in favor of rezoning the area to bring retail and restaurant businesses to the waterfront property.

"People are looking for 1950s jobs, but we have to look to the future," Scoville said.

Georgetown's population is 9,024, according to U.S. Census Bureau data. The city, more than an hour north of

Charleston, has the second-largest seaport in South Carolina. It also has a big historical footprint that goes back to the pre-Revolution era. That history should be what brings people into the small town, Scoville said.

"The mill sits right on the edge of a historical district. Rezoning would be more beneficial. The hope would be for a developer to come in and make a multiuse facility," he said.

The Georgetown City Council is now looking into rezoning the area.

**Mayor Wants Seafood, Not Steel**  
The city's redevelopment proposal would rezone the mill property for mixed use, preventing heavy industrial use. But it contains a grandfather clause that would allow Liberty House to operate the site as a steel mill indefinitely. If Liberty House can't make a go of it, the industrial zoning won't be available for any other company.

The mill sits on the Georgetown harbor at the Sampit River. The mayor envisions seafood restaurants or retail shops on the spot.

Nonindustrial businesses could bring hundreds more jobs than the steel mill could, Scoville said.

"If they want to spend \$20 million investing in the mill and bring in 300 jobs, then I fully support that," he said.

But based on past experiences, he isn't confident the mill will last more than five years, if that. By rezoning the space,

Georgetown would open the door for retail businesses if the mill fails.

ArcelorMittal threatened legal action against the city if the ordinance interferes with a potential sale.

An Albatross for Georgetown?

There have been issues with the mill's property in the past, Scoville said. Barges can't easily access it to transport material in and out of the facility. From what he's seen, that has contributed to past owners leaving.

Korf Industrie, a German company, first opened the plant in 1969, and it has changed hands at least four times since then. In the 1970s, the plant employed an estimated 1,500 workers. As mill ownership changed hands over the years, hundreds of workers were laid off.

Kuwait Investment Authority bought the mill in 1985 when Korf filed for bankruptcy. Bain Capital stepped in in 1993 and merged it with GS Technologies to form GS Industries. GS declared bankruptcy in 2001, and Mid-Coast Industries took over. When Mid-Coast filed for bankruptcy in 2003, International Steel Group came in. Mittal purchased International Steel in 2005 and merged it into what became ArcelorMittal.

The mill has shut down three times since 2002: once in 2003, again in 2009, and most recently in 2015. About 200 workers were laid off when ArcelorMittal pulled out.

ArcelorMittal had to refocus on its "core strategic markets" in the U.S., its carbon

products, the company said of the decision to close down.

Liberty House is aware of the mill's history and is ready to dive into the troubled property anyway. If successful, the mill would be the company's first major U.S. investment, Eoghan Mortell, a company spokesman, told Bloomberg BNA.

"Regarding matters related to Georgetown port, we're confident there are solutions available and we are discussing these at present," he said.

The company couldn't go into specifics of the plans for the mill, but Mortell said company leaders will apply a turnaround model that has been successful at other fledgling facilities they've taken over.

"I think it's fair to say that Liberty has a good track record of acquiring metals businesses that are struggling and restoring them to profitability by optimizing the use of the equipment and integrating these businesses with downstream engineering and manufacturing operations," he said.

#### Deal Not Final, but Union Crafts Contract

The Steelworkers local has already negotiated a contract with Liberty House to bring roughly 300 jobs into the mill, Sanderson, the local's president, said. The negotiations were completed Aug. 7 but aren't finalized.

It's been two years since the plant closed, but nearly 60 percent of former workers say they would go back to the mill, Sanderson said.

"They're looking to go back to a job they truly enjoy. They're experts on steel," he said.

Those "experts" could see salaries of close to \$90,000 if the mill opens, Sheldon Butts, a Georgetown City Council member, said. He's familiar with the USW negotiations and confirmed that number to Bloomberg BNA. A number of his family members and friends lost jobs at the mill when it closed.

The last ArcelorMittal and USW contract ran from September 2012 to September 2015. The top hourly salary was \$27.52 by the end of the contract, according to Bloomberg BNA labor data.

That rate is close to the area's average nonunion wages. The closest comparison for average wages in private manufacturing near Georgetown is in Charleston and North Charleston, S.C. Those workers receive \$36.49 an hour, Bloomberg BNA data show.

#### Councilman: Hospitality Jobs Don't Add Up

Georgetown has always been a heavy industrial town and should remain so, Butts said. "To think the tourism or hospitality industry could provide the same number of well-paying jobs as the mill would be naïve."

In South Carolina, the average hourly wage for retail workers is \$15.78, according to the Bureau of Labor Statistics. Waiters usually receive \$9.68 an hour.



Redevelopment could take 25 to 30 years to finish. The city needs to take advantage of an opportunity for hundreds of jobs now, rather than decades from now, he said.

"We just don't have that opportunity that often in the city of Georgetown," Butts said.

Clarence Smalls, another city council member who supports the mill, believes the town should give Liberty House a try.

"I feel that we should wait a while and see what happens," he said. The possibility for good jobs sooner rather than later is too good to pass up.

#### ArcelorMittal: Rezoning a 'Death Sentence'

Keith Nagel, ArcelorMittal's director of environmental affairs and real estate, implored the city's planning commission to reject rezoning, in a letter read during an April meeting. He called the proposed ordinance a "death sentence" for the deal and for steel jobs.

The original rezoning plan would have allowed industrial use to continue for five years. "Liberty House has the resources to make the capital investment necessary to re-open the mill. It is unreasonable to expect Liberty to buy the mill and make investments to secure its future, if they will only be able to operate it for a short time," Nagel said in a letter to the commission.

The commission moved to disapprove the rezoning. Its decision is just a recommendation, however, and the city council can ignore it.

Much like the rest of the city, the council is split on the issue, Butts said.

But Smalls said if Liberty House closes the mill down the road, Georgetown should forget about it.

"If it doesn't work out, I'd say no more mill," Smalls said.

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## **EXHIBIT 13**

### **U.S. CONSUMPTION AND DOMESTIC PRODUCTION OF STEEL 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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 2017

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

**CALENDAR YEARS 1999–2000 AND 2016–JANUARY–SEPTEMBER 2017**

*(All figures are in short tons.)*

<b><u>YEAR</u></b>	<b><u>U.S. APPARENT CONSUMPTION</u></b>	<b><u>U.S DOMESTIC PRODUCTION</u></b>
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>
2016	5,321,081 <sup>3/</sup>	3,570,360 <sup>4/</sup>
JANUARY– SEPTEMBER 2017	4,381,303 <sup>3/</sup>	2,895,305 <sup>4/</sup>
ANNUALIZED 2017	5,841,737	3,860,407

<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*, Investigations 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> *Carbon and Alloy Steel Wire Rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, The United Arab Emirates, and the United Kingdom*, Investigations No. 701-TA-573–574 and 703-TA-1349–1358 (Final), *Prehearing Report* (Public) (November 2, 2017) at IV-25.

<sup>4/</sup> *Id.* at III-5.

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## **EXHIBIT 14**

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

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 (FINAL)*

**PREHEARING BRIEF  
ON BEHALF OF  
THE AMERICAN WIRE PRODUCERS ASSOCIATION**

NOVEMBER 13, 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).

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I hereby certify that on this 13<sup>th</sup> day of November, 2017, I have caused to be served a true and complete copy of a *Prehearing 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 (Final), by hand or electronic mail, upon the following parties:

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**NOVEMBER 13, 2017**

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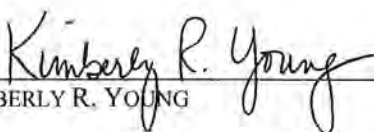
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