

**MAGNUM<sup>®</sup>**  
**FASTENERS**

April 22, 2005

Mr. Kelly Parkhill  
Director for Industry Support and Analysis  
Import Administration  
US Department of Commerce  
Room 3713  
14th Street and Constitution Avenue NW  
Washington, DC 20230

Re: Steel Import Monitoring and Analysis System — Comments

Dear Mr. Parkhill:

These comments are submitted on behalf of Mid Continent Nail Corp. regarding the Department's Steel Import and Monitoring Analysis (SIMA) system. Commerce invited comments in its *Federal Register* notice of its interim final rule on March 17, 2005 (70 Fed. Reg. 12,133).

While I endorse the decision to include carbon, stainless and other alloy steel drawn wire in the revised SIMA system, which will be implemented on June 9, 2005, I am also requesting that Commerce extend coverage of its import monitoring program to include the following categories of steel wire products:

- (1) Steel wire strand, rope, and cable (HTS 7312)
- (2) Barbed wire (HTS 7313)
- (3) Steel wire cloth, grill, netting and fencing (HTS 7314)
- (4) Steel wire nails and staples (HTS 7317)
- (5) Steel springs (HTS 7320)
- (6) Steel wire garment hangers (HTS 7326.20.0020)

Coverage of wire products is essential to the effectiveness and integrity of the SIMA system. For more information and justification for this request, please refer to the comments submitted by the American Wire Producers Association (AWPA), of which my company is a member. I concur completely with the comments submitted.

Sincerely,



David Libla  
President