Kelly Parkhill Director for Industry Support and Analysis Import Administration, Room 3713 Department of Commerce 14th Street and Constitution Ave., N.W. Washington, DC 20230

September 20, 2004

Re: Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

In response to the August 25th request by the Department of Commerce, I am writing to express my support for a continued Steel Import Monitoring and Analysis system that is both enhanced to include all steel products and extended indefinitely.

My company, Old Hickory Clay Company, is located in Hickory, Kentucky and employs 100 people. We supply refractory products to the steel industry and have a vested interest in a strong and healthy domestic steel industry. President Bush did the right thing in imposing the steel safeguard measures that allowed the steel industry breathing room to recover from the import crisis that began in 1998. American steelmakers have made great strides to enhance their competitiveness through consolidation and restructuring. We all have a stake in seeing that this recovery continues and succeeds. Establishing an effective and permanent import monitoring system that covers all basic steel products is a key step in achieving that result.

When the President lifted the Section 201 steel tariffs last December, he recognized that this program is critical to ensure that the government and industry participants have access to timely and accurate data with regard to imports. I urge the Administration to take swift action so that the new program is established before March 2005. Getting a new program up and running at the earliest possible date should be a top priority.

The Administration's endorsement of this program last December was right on the mark. I urge you to follow through on this commitment to a strong and effective steel import monitoring system.

Thank you for the opportunity to comment on this important program.

Sincerely, A.Kenneth Bougher Old Hickory Clay Company Hickory KY 42066

cc: The Honorable Donald L. Evans, Secretary of Commerce