

September 24, 2004

BY HAND DELIVERY

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

Re: Request for Comments on Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

These comments are submitted on behalf of Republic Engineered Products, Inc. ("Republic") in response to the Department of Commerce's ("the Department") request for comments on the continuation of the Steel Import Monitoring and Analysis System ("SIMA"), 69 Fed. Reg. 52,211 (August 25, 2004). Republic is headquartered in Fairlawn, Ohio, with steel mills in Canton and Lorain, as well as finishing facilities in Indiana and New York. Republic is North America's leading supplier of Special Bar Quality (SBQ) steel, a highly engineered product used in axles, drive shafts, suspension rods and other critical components of automobiles, off-highway vehicles and industrial equipment.

Republic has benefited directly from the President's Steel Initiative, including his decisions to provide temporary protection from imports under Section 201 and to implement SIMA. SIMA continues to help Republic respond to import competition. The jobs of Republic's nearly 2,300 employees in Ohio, Indiana and New York depend upon the success of our efforts. Conversion of SIMA to a permanent system will provide valuable assistance to Republic in a manner that is fully consistent with the international obligations of the United States.

Republic's predecessor companies have had to restructure in bankruptcy, in large part because of unfair import competition. While our restructuring was proceeding, the Section 201 relief created an environment that permitted Republic to reorganize its business. When he announced the termination of the Section 201 relief, President Bush and Secretary Evans committed themselves to making SIMA permanent. Republic has followed through on its obligations under the President's steel program, and we anticipate that the President and Secretary Evans will continue to follow through on their promise to continue SIMA.

Republic uses SIMA to track imports of hot-rolled bar and cold-finished bar. SIMA's surge monitoring website is a useful business tool for Republic's sales force and its management. Members of the domestic steel industry are recommending that SIMA include port-specific data. Such an expansion would be extremely useful to Republic. Bar products enter the United States through a number of different ports; knowledge of the ports of entry, as well as the types, volumes and value of the products involved will enable Republic to respond to import competition and allow it to better serve its U.S. customers.

Republic appreciates the efforts of President Bush and Secretary Evans to assist the U.S. steel industry in responding to foreign competition. These efforts have enabled Republic to continue to produce steel and to employ thousands of workers. I believe that SIMA is essential to our continued success. I would be pleased to meet with Department officials to discuss these comments. We thank you in advance for your consideration of our comments.

Respectfully submitted,



James T. Thielens, Jr.
Vice President, Commercial
Republic Engineered Products, Inc.