

# TAMCO



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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:

On behalf of TAMCO Steel (TAMCO), we respectfully submit the following comments in response to the Department of Commerce's ("the Department" or "Commerce") request for comments on the continuation of the Steel Import Monitoring and Analysis System ("SIMA"), 69 Fed. Reg. 52,211 (August 25, 2004). TAMCO strongly supports the continuation and expansion of this important program, which provides both government and industry with crucial and timely information on steel imports. In order to ensure that SIMA is able to effectively serve this purpose, it must be made permanent and comprehensive, and should provide data to the public in a format that serves the interests of all members of the domestic industry, including regional producers such as TAMCO.

TAMCO fully supports the joint industry comments submitted to the Department by the American Iron and Steel Institute, the Cold Finished Steel Bar Institute, the Committee on Pipe and Tube Imports, the Specialty Steel Industry of North America, the Steel Manufacturers Association, and other entities ("the domestic industry").

The availability of data by port of entry is of critical importance for regional steel producers like TAMCO. As the only steel mini-mill in California, producing 500,000 tons of rebar annually, TAMCO is primarily concerned with imports of rebar into the ports of Seattle, Portland, San Francisco, and Los Angeles/Long Beach. Currently, TAMCO must rely on Census data, which is published weeks after the fact, to track imports into these ports. Enhancing SIMA to allow for the reporting of data for specific ports of entry would provide TAMCO with more timely access to information that it needs to make business decisions, and provide an early warning mechanism to detect localized import surges.

TAMCO also believes that it is crucial that the data collected under the SIMA program be made available in a three-dimensional matrix of 10-digit HTS category by country of origin by port of entry. This would allow analysis at the same discrete level of detail as can be found in



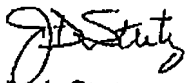
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the statistics published by the Bureau of the Census. SIMA's website should provide the flexibility and capability to allow the user to sort the database and construct custom output tables to meet the user's specific needs.

When the original 201 program was terminated, the Administration made clear its intent to maintain and expand the SIMA program. Despite this, Commerce did not begin this rulemaking process for eight months. Further delay, at a time when steel imports are again rising, could endanger the benefits of the original 201 program and leave the industry vulnerable to import surges. In light of this, the Department should act expeditiously to ensure that these enhancements are implemented well before the current SIMA system expires in March 2005.

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,



Jack Stutz  
President and Chief Executive Officer  
TAMCO Steel