

6/30/2003

Grant D. Aldonas
Under Secretary for International Trade
Central Records Unit
Room 1870
U.S. Department of Commerce
Pennsylvania Avenue and 14th Street, NW
Washington, DC 20230
Attn: Softwood Lumber Policy

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IMPORT ADMINISTRATION

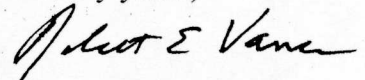
Dear Mr. Aldonas;

In reviewing the Proposed Policy Agreement on the Countervailing Duty Order on Softwood Lumber from Canada I submit the following comments:

Section B Market Based Pricing, Sub Section 1 d. Barriers to Entry or Exit in the Market

The Province of British Columbia imposes significant barriers to exit of private logs from the Province to the United States. For the past 2 years I have been purchasing Douglas-fir sawlogs in British Columbia for Georgia-Pacific. These logs originate from private lands owned by TimberWest on Vancouver Island. I have negotiated the purchase, barging, and delivery of approximately 35,000 MBF of logs to our Coos Bay, Oregon Sawmill. In order to sell logs from their timberlands TimberWest is required to advertise the logs for export, and give British Columbia mills the opportunity to block their export into the United States. I feel this practice gives the local mills an advantage on log price, and thus a subsidy on the lumber they produce for shipment into the United States. If we can purchase private logs in British Columbia, ship them 500 miles and make a profit cutting them in our sawmill, why are Canadian mills in need of a subsidy granted through private log export restrictions? The states of Oregon and Washington both prohibit the export of state and federal logs, but grant free access to Canadian mills purchasing private logs on the U.S. side of the border for shipment into British Columbia. Please consider this unfair barrier before agreeing on a settlement of the softwood lumber dispute with Canada.

Sincerely yours,



Robert E. Vance
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Portland, OR. 97215