04-002323.0

Jason Allen, President Standard Iron and Metals Co.

4525 San Leandro St. Oakland, CA 94556

May 24, 2004

The Honorable Dan Evans, Secretary Department of Commerce 1401 Constitution Ave., N.W. Washington, DC 20230

Dear Secretary Evans,

I am the president and owner of a scrap metal recycling company that employee nearly forty five people. We are a company whose revenues provide needed jobs for the surrounding community and economic security for the families of our employees.

Recently, the economic health of our company has come under threat from a petition that the Copper and Brass Fabricators Council filed with the Department of Commerce requesting the protection of copper under section 7(c) of the Export Control Act.

This letter will voice our opposition to that petition, as well as to a similar petition likely to be filed by the Non-Ferrous Founders Society and targeted at steel. The intentions of both petitions are to alleviate a shortage of copper and steel and lower prices. However, there are two fundamental flaws in the arguments put forward by the petitions in order to justify the requested protectionist actions.

1) Instituting protectionist policies will not lower the price of copper and steel. Both commodities are traded on a global scale and protectionist policies have historically created upward pressure on commodity prices. Recent oil production cuts provide an acute analogue of detrimental supply-side manipulation.

2) Neither copper nor steel are in short supply.

The significant drop in copper prices over the last month demonstrates the erroneous assertion made by the current petition that copper in short supply. Prices rarely drop during shortages in such commodities. It should also be noted that steel prices have dropped significantly in recent weeks ahead of the Non-Ferrous Founders Society's petition alleging a similar shortage of steel.

I respectfully request that you deny the current petition from the Copper and Brass Fabricators Council and any similar petition from the Non-Ferrous Founders Society because of their potentially detrimental effect on commerce in the United States.

Thank you for your time and attention to this matter.

Sincerely,

Jason Allen, President Standard Iron and Metals Co.