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May 28, 2004

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

Re: Copper Export Control Petition

Dear Secretary Evans:

Atlas Metal & Iron Corp. is a large volume industrial and commercial scrap metal processing company located in Denver. We are a member of the Institute of Scrap Recycling Industries (ISRI) and have four locations and employ approximately one hundred and twenty people. We sell scrap both domestically as well as for export.

I am writing to ask you to oppose the copper export control petition that has been submitted by the Copper and Brass Fabricators Council and the Non-Ferrous Founders Society. They argue in their petition that copper is in short supply in the U.S. and must therefore be protected pursuant to: section 7(c) of the Export Control Act. For you information, it is our understanding that a similary petition will soon be filed by a steel association seeking to impose export controls on ferrous scrap.

It is our very strong contention that no such shortage of copper or steel exists. Both copper and steel scrap are global commodities. Prices paid for scrap are cyclical and are subject to global fundamentals of supply and demand. The petitioners are simply seeking to circumvent such fundamentals and are actually aiming to simply artificially control the pricing of scrap. In fact, the contrary may occur as was the case the last time controls of the export of scrap were imposed. As you may also be aware, scrap prices have already begun to fall significantly.

ISRI is the trade association that represents over 1,200 scrap recycling firms. ISRI promotes free and fair trade. It is certainly our position that the current methodology employed by filing the petition to control the export of scrap is not representative of fair trade and we believe further that such a policy would violate WTO rules. There are better avenues and remedies available to address unfair trade practices and those such remedies should be employed. Imposition of controls represents an unfair trade practice in and of itself which will significantly and unduly injure our domestic scrap recycling industry.

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We greatly appreciate your attention to this matter and again would be most grateful if you would oppose this pending petition. In the event that you should have any questions or comments please do not hesitate to contact me directly at (303) 623-0143.

Very truly yours,

ATLAS METAL & IRON CORP.

Jerry Simms

Vice President, Sales

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