

Kelly Parkhill
Director for Industry Support and Analysis
Import Administration, Room 3713
Department of Commerce
14th Street and Constitution Ave., N.W.
Washington, DC 20230

RE: Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

On behalf of the American Steel Coalition (ASC), a national organization dedicated to ensuring a robust U.S. steel industry through free and fair global trade practices, I am writing to urge quick action to enhance and extend the existing Steel Import Monitoring and Analysis system.

ASC represents steel industry suppliers, customers and concerned citizens across the country who recognize that a strong independent steel industry is vital to our nation's prosperity and national security. As the Administration itself has recognized, this is a critical program to ensure that the government and industry participants have access to timely and accurate data with regard to imports. Getting a new program up and running at the earliest possible date should be a top priority.

The steel industry took advantage of the 20-month breathing period afforded by the Section 201 steel tariffs that the President initiated in March 2002 to enhance its competitiveness through a series of dramatic steps to consolidate and restructure, while adopting new and innovative labor agreements. We all have a stake in seeing this recovery continue and succeed. Establishing an effective and permanent import monitoring system that covers all basic steel products is a key step in achieving that result. Failure to do so could jeopardize the significant progress made and could also threaten the future stability and strength of the steel industry, an industry essential to manufacturing and our national and economic security.

During the steel import crisis that began in 1998, my company and hundreds of other coalition members' companies suffered tremendous losses, mirroring the industry's performance. As a result of the industry's transformation and the recent rise in world steel demand, my company and thousands like it have turned the corner, have seen revenues rising and even some jobs returning. The steel industry's health is critical to the progress of ASC member companies' health and profitability.

The Administration's endorsement of this program last December was the correct decision for government and industry alike. More and better information can only be a good thing for the effective functioning of the market, as well as for policy makers as they consider issues affecting the steel sector. This program in no way hinders or limits imports, is fully WTO-consistent, and similar systems are already in place abroad. Given that the existing program will expire next March, time is of the essence in implementing an improved system.

Thank you for the opportunity to comment on this essential program. Please keep me informed of developments as the Department of Commerce works to put in place a new and improved system.

Sincerely,

Charles W. Connors

President

American Steel Coalition

cc: The Honorable Donald L. Evans, Secretary of Commerce