



Mexico City, September 23, 2004.
DG/170/04.

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 member companies of the Mexican Steel Producers Association, Camara Nacional de la Industria del Hierro y del Acero ("CANACERO"), we are pleased to provide this submission in response to the August 25th request for comments on the Steel Import Monitoring and Analysis ("SIMA") System. We believe that an effective import monitoring system – such as that embodied by the SIMA program – serves an important role in providing accurate and timely information to all market participants, and is clearly of benefit to NAFTA steel producers. The SIMA system offers a transparent, WTO-compatible, non-disruptive means of collecting and disseminating expedited information with regard to imports into the U.S. market.

Providing better information with regard to market developments in the United States is of benefit to all NAFTA producers, given the importance of developments in the U.S. market to producers throughout North America. Accordingly, we support the extension of this program and its expansion to cover other basic steel products.

CANACERO believes in the importance of fair trade and effective trade laws in the NAFTA region, and a key objective of the intergovernmental North American Steel Trade Committee ("NASTC") is to "take stock of emerging problems, trade trends and areas of concern regarding global steel trade..." A transparent and effective import monitoring system furthers this NASTC goal. It provides an opportunity for government policy makers and industry participants to react quickly to material changes -- and it helps to improve the efficiency of the market, as industry participants are able to form more timely, accurate expectations about future conditions and developments.

CANACERO is, at present, working closely with the government to establish a transparent, web-based, more effective steel import monitoring system in Mexico.

In short, we support the continuation of the SIMA program and its expansion to cover additional steel products, something that has already been proposed by the U.S. Administration. The SIMA has shown itself to be an effective and non-disruptive program that is of particular benefit to NAFTA partners. It deserves to be extended.

Thank you for the opportunity to comment on this important program and please do not hesitate to contact me with any questions.

Sincerely,


Mexican Steel Producers Association (CANACERO)
Martha G. Alva de la Selva
General Director.