



Dennis McGlone
President and
Chief Executive Officer
412.263.3084

September 28, 2004

Mr. Kelly Parkhill
Director for Industry Support and Analysis
Import Administration
Room 3713
U. S. Department of Commerce
14th & Constitution Ave., NW
Washington, DC 20230

Dear Mr. Parkhill:

Re: Comments on Steel Import Monitoring and Analysis System

You have received recommendations for improving the current import licensing and monitoring system, due to expire March 20, 2005, from the Metals Service Center Institute and a group of representatives of the domestic steel industry. (Reference letters dated September 24, 2004.)

As a member of both the Metals Service Center Institute and Steel Tube Institute, Copperweld Corporation fully supports the broad scope of improvements now on the record. In addition, we urge you to make product categorization more specific for steel tubing, i.e., stainless, mechanical as welded, drawn-over-mandrel, cold drawn seamless, hot finished seamless, and hollow structural sections, with as much size range detail as possible.

Copperweld is prepared to work with your organization, most likely under auspices of the Steel Tube Institute, to improve the Steel Import Monitoring System.

Thank you for your attention to this matter.

Truly yours,

Dennis McGlone

DMcG:jat

cc: J. R. Baske

D. W. Seeger

R. Weidner, III

W. A. Wolfe

Re: Comments on Steel Import Monitoring and Analysis System