



September 24, 2004

**BY HAND DELIVERY**

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

Re: Request for Comments on Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

On behalf of Gerdau Ameristeel Corporation ("Gerdau Ameristeel"), we respectfully submit the following comments in response to the Department of Commerce's ("the Department") request for comments on the continuation of the Steel Import Monitoring and Analysis System ("SIMA"), 69 Fed. Reg. 52,211 (August 25, 2004). Gerdau Ameristeel strongly supports the continuation and expansion of this important program, which provides both government and industry with crucial and timely information on steel imports. In order to ensure that SIMA is able to effectively serve this purpose, it must be made permanent, and expand to include all steel products, not just those that were subject to the Section 201 remedy.

Gerdau Ameristeel fully supports the joint industry comments submitted to the Department by the American Iron and Steel Institute, the Cold Finished Steel Bar Institute, the Committee on Pipe and Tube Imports, the Specialty Steel Industry of North America, the Steel Manufacturers Association, and other entities ("the domestic industry"). Gerdau Ameristeel urges the Department to implement the following core improvements in the SIMA program at the earliest possible date:

1. The SIMA system must be made permanent, to allow all interested parties to monitor steel import activity continually at a high level of detail, and as close as possible to real time.
2. Product coverage must be expanded to cover all basic steel products, not just those that had been subject to the Section 201 remedy.
3. Both volume and value data must be collected and disseminated.
4. Data should be provided to the public by 10-digit HTS product, country of origin and port of entry.

These changes are critical, they are specifically authorized under the WTO, and they are fair, since many of our trading partners already have permanent steel import licensing in place. As an importer of steel as well as a U.S. producer, Gerdau Ameristeel can attest to the fact that

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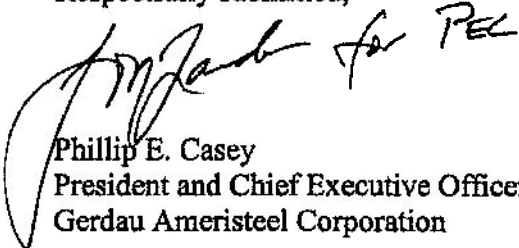
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the burden of reporting the information required by the SIMA program is minimal, and is far outweighed by the benefits of having timely public access to steel import data, information that is useful to U.S. producers and importers alike.

When the original 201 program was terminated, the Administration made clear its intent to maintain and expand the SIMA program. Despite this, Commerce did not begin this rulemaking process for eight months. Further delay, at a time when steel imports are again rising, could endanger the benefits of the original 201 program and leave the industry vulnerable to import surges. In light of this, the Department should act expeditiously to ensure that these enhancements are implemented well before the current SIMA system expires in March 2005.

I would be pleased to meet with Department officials to discuss these comments. We thank you in advance for your consideration of our comments.

Respectfully submitted,



Phillip E. Casey  
President and Chief Executive Officer  
Gerdau Ameristeel Corporation