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IMPORT ADMINISTRATION

September 22, 2004

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

RE: Ispat Inland's Comments on Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

On behalf of Ispat Inland Inc. ("Ispat Inland"), I submit these comments in support of the extension, expansion and enhancement of the Steel Import Monitoring and Analysis ("SIMA") system. The SIMA system has been providing critical information to the U.S. steel industry since early 2003 and should be extended beyond its current March 21, 2005 termination date. The SIMA system's extension, however, must be accompanied by a number of changes to its product coverage and import monitoring to ensure that the collected information is thorough and useful.

Product Coverage

The current SIMA system only focuses on steel imports once subject to the Section 201 steel safeguards program. At a minimum, the following products should be included in the SIMA system:

Carbon and Alloy Long Products

Semi-finished steel billets; carbon and alloy hot-rolled bars and coils; carbon and alloy cold-formed bars and coils; carbon and alloy wire rod steels in coils; hot-rolled bars, including leaded/free-machining hot-rolled bars.

Carbon and Alloy Flat Products

Semi-finished slabs; carbon and alloy plate in coils; carbon and alloy hot-rolled steels; carbon and alloy hot-rolled high-strength steels; carbon and alloy cold-rolled steels; carbon and alloy cold-rolled high-strength steels; carbon and alloy cold-rolled painted steels; carbon and alloy hot-dipped galvanized steels; carbon and alloy aluminized steels; carbon and alloy other coated steels; carbon and alloy electro-galvanized steels; carbon and alloy non-grain-oriented electrical steels; and carbon and alloy grained-oriented steels.

The following is a list of these long and flat products with their tariff classifications from Chapter 72 of the Harmonized Tariff Schedule of the United States:

Steel Family	Steel Group	Steel Type	HTS Classification
Semi-Finished Products	Carbon and Alloy Long Products	Billets	7207.11.00.00, 7207.12.00.10, 7207.19.00.90, 7207.20.00.25, 7207.20.00.90, 7224.90.00.45
****	Carbon and Alloy Flat Products	Slabs	7207.12.00.50, 7207.20.00.45, 7224.90.00.55
Bar Products	Carbon and Alloy Long Products	Billets	7207.11.00.00, 7207.12.00.10, 7207.19.00.90, 7207.20.00.25, 7207.20.00.90, 7224.90.00.45
****	****	Wire Rod	7213.91.30.11, 7213.91.30.91, 7213.91.45.00, 7213.91.60.00, 7213.99.00.30, 7213.99.00.60, 7213.99.00.90, 7221.00.00.15, 7221.00.00.30
****	****	Free-Machining	7213.20.00.00, 7214.30.00.00, 7215.10.00.00
Bar Products	Carbon and Alloy Long Products	Hot-Rolled	7213.10.00.00, 7213.20.00.00, 7213.99.00.60, 7214.10.00.00, 7214.20.00.00, 7214.30.00.00, 7214.91.00.15, 7214.91.00.60, 7214.91.00.90, 7214.99.00.15, 7214.99.00.30, 7214.99.00.45, 7214.99.00.60, 7214.99.00.75, 7214.99.00.90, 7215.90.10.00, 7227.20.00.00, 7227.90.60.05, 7227.90.60.50, 7228.20.10.00, 7228.30.80.50, 7228.40.00.00, 7228.60.60.00, 7228.80.00.00, 7213.91.30.11, 7213.91.30.91, 7213.91.45.00, 7213.91.60.00, 7213.99.00.30, 7213.99.00.60, 7213.99.00.90
****	****	Cold-Formed	7215.10.00.00, 7215.50.00.15, 7215.50.00.60, 7215.50.00.90, 7215.90.30.00, 7215.90.50.00, 7228.20.50.00, 7228.50.50.50, 7228.60.80.00
Flat Products	Carbon and Alloy Flat Products	Slabs	7207.12.00.50, 7207.20.00.45, 7224.90.00.55
****	****	Plate in Coils	7208.25.30.00, 7208.37.00.60, 7208.25.60.00, 7208.36.00.30, 7208.36.00.60, 7208.37.00.30, 7211.14.00.90, 7225.30.30.50

Steel Family	Steel Group	Steel Type	HTS Classification
		Hot-Rolled	7208.26.00.30, 7208.26.00.60, 7208.27.00.30, 7208.27.00.60, 7208.38.00.15, 7208.38.00.30, 7208.38.00.90, 7208.39.00.15, 7208.39.00.30, 7208.39.00.90, 7211.19.15.00, 7211.19.20.00, 7211.19.30.00, 7211.19.45.00, 7211.19.60.00, 7211.19.75.30, 7211.19.75.60, 7211.19.75.90, 7225.40.70.00, 7226.91.70.00, 7226.91.80.00
		Hot-Rolled High-Strength	7208.26.00.30, 7208.27.00.30, 7208.38.00.15, 7208.39.00.15
		Cold-Rolled	7209.15.00.00, 7209.16.00.30, 7209.16.00.60, 7209.16.00.91, 7209.17.00.30, 7209.17.00.60, 7209.17.00.91, 7209.18.15.30, 7209.18.15.60, 7209.18.60.90, 7209.25.00.00, 7209.26.00.00, 7209.27.00.00, 7209.28.00.00, 7209.90.00.00, 7210.70.30.00, 7225.50.80.85, 7225.99.00.90, 7226.92.50.00, 7226.92.70.50, 7211.23.15.00, 7211.23.20.00, 7211.23.30.00, 7211.23.45.00, 7211.23.60.30, 7211.23.60.60, 7211.23.60.85, 7211.29.20.30, 7211.29.20.90, 7211.29.45.00, 7211.29.60.30, 7211.29.60.80, 7211.90.00.00, 7212.40.10.00, 7212.40.50.00, 7226.99.00.00
		Cold-Rolled High-Strength	7209.16.00.30, 7209.16.00.60, 7209.17.00.30, 7209.17.00.60, 7209.18.15.30, 7209.18.15.60
		Cold-Rolled Painted Steels	7210.70.30.00, 7212.40.10.00, 7212.40.50.00
Flat Products	Carbon and Alloy Flat Products	Hot-Dipped Galvanized Steels	7210.41.00.00, 7210.49.00.30, 7210.49.00.90, 7210.70.60.60, 7210.70.60.90, 7212.30.10.30, 7212.30.10.90, 7212.30.30.00, 7212.30.50.00, 7225.92.00.00, 7226.94.00.00
		Aluminized Steels	7210.61.00.00, 7210.69.00.00
		Other Coated Steels	7210.70.60.90, 7210.90.90.00, 7212.50.00.00

Steel Family	Steel Group	Steel Type	HTS Classification
...	...	Electro-Galvanized Steels	7210.30.00.30, 7210.30.00.60, 7210.70.60.30, 7212.20.00.00, 7210.90.60.00, 7225.91.00.00, 7226.93.00.00
...	...	Electrical Steels Non-Grain Oriented	7225.19.00.00, 7226.19.10.00, 7226.19.90.00, 7226.11.90.30, 7226.11.90.60
...	...	Electrical Steels Grain Oriented	7225.11.00.00, 7226.11.10.00, 7226.11.90.30, 7226.11.90.60

Import Monitoring

The following reports should be maintained as “early warning” mechanisms for assessing import volumes and average unit values (“AUV”) that may threaten the domestic industry:

Import Monitoring Reports

Type	Unit of Measure	By Country?	By HTS?	Special Instructions
All Steels Volumes	Net Tons (NT)	Yes	Yes	All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels Average Unit Value (AUV)	\$/NT	Yes	Yes	All Steel Types/ Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
All Steels New Entrants Volumes	NT	Yes	Yes	All Steel Types/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels Port of Entry Volumes	NT	Yes	Yes	All Steel Types/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels Port of Entry AUV	\$/NT	Yes	Yes	All Steel Types/Frequency: By Month, Quarter, Year/Percentage Change

Type	Unit of Measure	By Country?	By HTS?	Special Instructions
All Steels GSP Countries Volumes	NT	Yes	Yes	GSP Countries/All Steel Types/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels NAFTA Countries Volumes	NT	Yes	Yes	Canada and Mexico/All Steel Types/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels Non-GSP Countries Volumes	NT	Yes	Yes	Non-GSP Countries/All Steel Types/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Steels GSP Countries AUV	\$/NT	Yes	Yes	GSP Countries /All Steel Types/Frequency: By Month, Quarter, Year/Percentage Change
All Steels NAFTA Countries AUV	\$/NT	Yes	Yes	Canada and Mexico/All Steel Types/Frequency: By Month, Quarter, Year/Percentage Change
All Steels Non-GSP Countries AUV	\$/NT	Yes	Yes	Non-GSP Countries/All Steel Types/Frequency: By Month, Quarter, Year/Percentage Change
All Long Products Volumes	NT	Yes	Yes	All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Long Products AUV	\$/NT	Yes	Yes	All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Long Products GSP Countries Volumes	NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change

Type	Unit of Measure	By Country?	By HTS?	Special Instructions
Long Products GSP Countries AUV	\$/NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Long Products Non-GSP Countries Volumes	NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
Long Products Non-GSP Countries AUV	\$/NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Long Products NAFTA Countries Volumes	NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
Long Products NAFTA Countries AUV	\$/NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
All Flat Products Volumes	NT	Yes	Yes	All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
All Flat Products AUV	\$/NT	Yes	Yes	All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Flat Products GSP Countries Volumes	NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
Flat Products GSP Countries AUV	\$/NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Flat Products Non-GSP Countries Volumes	NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
Flat Products Non-GSP Countries AUV	\$/NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change

Type	Unit of Measure	By Country?	By HTS?	Special Instructions
Flat Products NAFTA Countries Volumes	NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change
Flat Products NAFTA Countries AUV	\$/NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change
Steel Licensing GSP Countries Long Products Volumes	NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison/ Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing GSP Countries Long Products AUV	\$/NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison/ Frequency: By Month, Quarter, Year/Percentage Change Important to report date of entry
Steel Licensing Non-GSP Countries Flat Products Volumes	NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing GSP Countries Flat Products AUV	\$/NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison Frequency: By Month, Quarter, Year/Percentage Change Important to report date of entry
Steel Licensing Non-GSP Countries Long Products Volumes	NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing Non-GSP Countries Long Products AUV	\$/NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency By Month, Quarter, Year/Percentage Change Important to report date of entry
Steel Licensing Non-GSP Countries Flat Products AUV	\$/NT	Yes	Yes	Non-GSP Countries/All Steel Types/Historical Comparison/Frequency By Month, Quarter, Year/Percentage Change Important to report date of entry

Type	Unit of Measure	By Country?	By HTS?	Special Instructions
Steel Licensing GSP Countries Flat Products Volumes	NT	Yes	Yes	GSP Countries/All Steel Types/Historical Comparison Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing NAFTA Countries Long Products Volumes	NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing NAFTA Countries Long Products AUV	\$/NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change Important to report date of entry
Steel Licensing NAFTA Countries Flat Products Volumes	NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Share/Percentage Change Important to report date of entry
Steel Licensing NAFTA Countries Flat Products AUV	\$/NT	Yes	Yes	Canada and Mexico/All Steel Types/Historical Comparison/Frequency: By Month, Quarter, Year/Percentage Change Important to report date of entry

Supplemental Reports (by dimension) for Bar Products

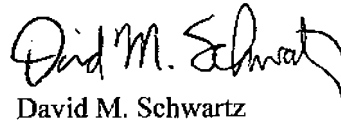
Type	By Country?	By HTS?	Carbon Content	By Width	By Length
Bar Products	Yes	Yes	<25%	<14mm	In coils
Bar Products	Yes	Yes	>25%	<14mm	In coils
Bar Products	Yes	Yes	<6%	<14mm	In coils
Bar Products	Yes	Yes	<25%	>14mm	In coils
Bar Products	Yes	Yes	>25%	>14mm	In coils
Bar Products	Yes	Yes	<6%	>14mm	In coils
Bar Products	Yes	Yes	<25%	<14mm	Not in coils

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Type	By Country?	By HTS?	Carbon Content	By Width	By Length
Bar Products	Yes	Yes	>25%	<14mm	Not in coils
Bar Products	Yes	Yes	<6%	<14mm	Not in coils
Bar Products	Yes	Yes	<25%	>14mm	Not in coils
Bar Products	Yes	Yes	>25%	>14mm	Not in coils
Bar Products	Yes	Yes	<6%	>14mm	Not in coils

Thank you for this opportunity to recommend changes to the current SIMA. We look forward to working with you throughout this process. If additional clarification or more information is needed, please contact me or Jose Cisneros of the Ispat Inland Law Department at (219) 399-2428.

Sincerely,


David M. Schwartz

cc: Jose Cisneros