



MANUFACTURE

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September 22, 2004

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

Dear Mr. Parkhill:


As president of Manufacture Alabama, a trade association representing the state's manufacturing industries, I am writing in support of the extension and expansion of the existing steel import monitoring system which is due to expire next March. The steel industry is crucial to Alabama and its economic and job base. The plight of America's steel industry over the last 20 years in the face of massive volumes of unfairly traded steel imports has certainly been felt in Alabama.

We supported and were gratified by President Bush's implementation of the steel safeguard relief program in 2002 in the face of the steel industry crisis. We were also gratified by the President's pledge in 2003 to retain and expand the program, and we urge the Commerce Department to follow through on that pledge. It is clear that the steel industry is among the most cyclical of businesses. The basic elements of the global steel market that brought about more than 30 steel company bankruptcies and tens of thousands of lost jobs in America in recent years have not gone away. It is naïve to assume that when global market conditions so dictate, foreign steel producers – often subsidized by their governments – will not revert to their predatory trading practices in our market. It is only good sense and sound policy to be ready for that eventuality with a more effective, real-time system for monitoring foreign steel products in our market.

The monitoring program which our steel industry needs, and which we support, is in compliance with WTO standards, does not affect free trade in any way, and would provide the vital information needed by government, steel producers and consumers. I understand it is similar to the monitoring program that Canada has had in place for years. It makes no sense for the United States – the most open and vulnerable market in the world – not to have such a permanent program as well.

I urge the Commerce Department to expand and make permanent the President's proposed steel import monitoring system. Thank you for your consideration.

Sincerely,



George Clark
President

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