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The Honorable Philip M. Crane  
Chairman, Subcommittee on Trade  
Committee on Ways And Means  
U.S. House of Representatives  
Washington, DC 20515

Re: Public Comments on H.R. 4128, Legislation to Amend  
Country-of-Origin of Fittings and Flanges

Dear Mr. Chairman:

I write to submit the following public comments on behalf of Ideal Forging Corporation located in Southington, Connecticut. We have been a manufacturer of stainless flange products since 1947 and employ 110 workers.

Ideal Forging has always supported a strong and vibrant trade environment. However, we also are aware of the challenges that our company and others in the industry have faced from unfair trade practices.. We rely on the U.S. trade laws and also on strong U.S. markings rules to ensure that trade is conducted in a fair and transparent manner.

I have had the opportunity to review the provisions as outlined in H.R. 4128 and have provided further comments in our prepared public remarks. Our comments are submitted to the committee in opposition to this legislation.

Thank you for allowing me to share our views on this important matter. Should you or your staff have any questions, please feel free to contact me at the above number.

Sincerely,

Gary G. Bouffard  
Executive Vice President/COO

Public Comments of Ideal Forging Corporation  
As to the Introduction of the  
Marking Harmonization Act of 2002 (H.R. 4128/S. 2235)  
107th Congress

## Background

Ideal Forging Corporation is a fully integrated manufacturer of stainless steel flanges. This means that we fulfill substantial transformation of the product by performing both forging and machining processes from a raw piece of material to obtain the finished flange part. Ideal Forging Corporation has been in business since 1947 and now employs 110 workers.

Ideal Forging Corporation has strongly supported the U.S. unfair trade laws and has supported the efforts of the U.S. trade agencies, including the Department of Treasury and the U.S. Customs Service; The Office of the U.S. Trade Representative; the Department of Commerce and the U.S. International Trade Commission in the administration and enforcement of the trade laws.

## Comments of the "Markings Harmonization Act of 2002"

These comments address the "Markings Harmonization Act of 2002" (H.R. 4128 and S. 2235) which was introduced in April 2002 in the House and Senate and is currently pending in the respective committees in congress. Ideal Forging is aware of the importance of the existing marking rules and regulations as prescribed by the U.S. Customs Service. The industry has advocated "strict marking definitions" to ensure that the country-of-origin along with other entry information is obtained when pipe, tube, flange, and fittings products enter the U.S.

The provision included in H.R. 4128/S. 2235 would change the existing marking law as it applies to these products. Specifically, as described in the bill, the ultimate purchaser of flanges or butt welded fittings would be allowed to perform minimal changes to an imported product which would result in the purchaser being able to mark the product as their own, perceived as being U.S. domestically made, instead of marking the product from the original country-of-origin. As detailed in the bill. Many of these changes are minimal at least and would not otherwise represent a substantial transformation to the product under normal Customs application of the law. Thus, the end user of the product would not know the actual country-of-origin of the product and would instead be under the impression that the company selling the finished product had manufactured the fitting or flange, when most of the value, character, and origin of the fitting or flange came from a foreign country,

Ideal Forging believes that the provisions as outlined in H.R. 4128/ S. 2235 weakens the existing marking and country-of-origin requirements in the law. Furthermore, this legislation deviates from the purpose of the labeling and marking rules, which apply to this industry and prevents the end user or customer from knowing the true country-of-origin of the product. Ideal Forging Corporation strongly opposes this legislation and would not support this bill to move forward in this session of Congress.

Please contact me if you have any questions or need more information.

Respectfully,

Gary G. Bouffard  
Executive Vice President/COO