



**UNIVERSAL FOREST PRODUCTS, INC.**

October 8, 2003

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DEPT. OF COMMERCE  
ITA  
IMPORT ADMINISTRATION

Mr. James J. Jochum  
Assistant Secretary for Import Administration  
U.S. Department of Commerce  
Central Records Unit, Room 1870  
Pennsylvania Avenue & 14<sup>th</sup> Street NW  
Washington, DC 20230  
Attn: Section 201 Duties

**RE: Anti-Dumping Proceedings - Treating of Section 201 Duties and Countervailing Duties**

Dear Mr. Jochum:

Please accept this letter in response to the request for comments to the proposal to deduct countervailing duties as well as duties imposed under Section 201 of the Trade Act of 1974 from export price (EP) and constructed export price (CEP) in calculation of the dumping margins, pursuant to Section 272 of the Tariff Act of 1930. We oppose this proposal.

We think the proposal is an inherently bad policy which would be a huge detriment to both the U.S.-based remanufacturers and producers of lumber and building products and for the U.S. consumers of lumber and building materials. Implementing this proposed deduction would unfairly have the effect of further increasing the impact of any countervailing and other duties applied to the product.

The proposed deduction is part of a flawed policy of increasing the burdens on U.S.-based primary producers and trying to increase the duties and penalties on goods coming from certain other countries in violation of NAFTA. The whole process creates a vicious cycle of protectionism and price inflation, when the real crux of the issue is lack of harvestable timberlands in the United States due to environmental and other restrictions. Doubling up on duties does not solve this problem and merely exasperates the issue for the American consumer.

*Corporate Headquarters*



We strongly believe the American consumer should be the paramount consideration for this discussion. Providing the best product at the best value is the true desire of the American consumer. Tariffs, duties, and other government imposed, non-value added costs obstruct this goal and serve as impediments to otherwise appropriate and desired activity for the U.S. manufacturers.

Please feel free to contact me if you have any questions, but again we strongly urge rejection of this proposal.

Very truly yours,

A handwritten signature in black ink that reads "Matt Missad" with a small flourish at the end.

Matthew J. Missad  
Executive Vice President

MJM:cah

cc: Bill Currie  
Mike Glenn  
David Phelps  
Mike Mordell  
Claude Parent  
Bobby Hill  
Scott Greene