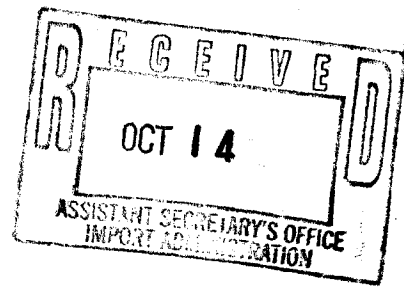




IDAHO TIMBER CORPORATION

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Robert B. Luce
General Counsel



October 8, 2003

The Honorable Donald L. Evans
Secretary of Commerce
U.S. DEPARTMENT OF COMMERCE
14th Street and Constitution Avenue, N.W.
Washington, D.C. 20230

Re: Treatment of Section 201 Duties and Countervailing Duties

Dear Secretary Evans:

On behalf of Idaho Timber Corporation, Boise, Idaho, the largest remanufacturer of SPF lumber in the United States, we join **The Weyerhaeuser Company and The U.S. Value-Added Wood Products Alliance in urging you to decline Petitioners' request to deduct Section 201 duties and countervailing duties from the U.S. price in dumping margin calculations.**

We are opposed to Petitioners' suggested approach, in as much as it would result in a double penalty for users of Canadian lumber like Idaho Timber at a time when jobs in the U.S. remanufacturing sector are extremely fragile and already threatened by the punishing AD/CVD duties in this case. Petitioners' suggested approach would represent a windfall for members of the Coalition for Fair Lumber Imports, who according to the recent NAFTA Panels' decision, may or may not, even be "threatened with material injury" by Canadian lumber. As stated in that decision, five factors unrelated to Canadian imports may have had an impact on the U.S. Coalition's members: (1) the domestic industry itself; (2) third-country imports; (3) the growth of engineered wood products; (4) constraints on domestic production/insufficient timber supplies; and (5) the cyclical nature of the softwood lumber industry." Under these circumstances, there is no logical basis in law or fact to embrace Petitioners' request when it could result in increasing the number of product sales that are allegedly being "dumped" and/or result in a substantial increase in the antidumping duty.

Idaho Timber Corporation is interested in having fair, open, and competitive commercial trade in lumber between the United States and Canada. The U.S. trade laws should not be manipulated by anyone at the expense of U.S. jobs. Absent fairness where we are able to obtain raw material from Canada on a competitive basis, we may be forced to close some or all of our remanufacturing plants in the U.S., at a loss of more than 800 jobs.



Honorable Don Evans

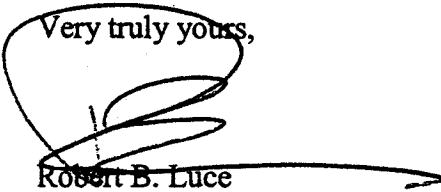
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As a result, we urge you to deny Petitioners' request to deduct Section 201 duties and countervailing duties from the U.S. price in dumping margin calculations.

On behalf of our 800 employees working in Montana, Idaho, Texas, New Mexico, Texas, Kansas, Arkansas, North Carolina and Florida, and the estimated 750,000 jobs in the U.S. remanufacturing sector, thank you Secretary Evans for your leadership and consideration of the issues that directly impact U.S. remanufacturers. Your willingness to undertake the task of developing a short-term and long-term solution to the softwood lumber dispute that is fair to everyone is greatly appreciated by each and every one of our employees.

Very truly yours,



Robert B. Luce
General Counsel – ITC

CC: Honorable Grant Aldonas, Under Secretary
James J. Jochum, Assistant Secretary Import Administration
Senator Larry Craig – Idaho
Senator Mike Crapo – Idaho
Senator Conrad Burns – Montana
Senator Max Baucus – Montana