

January 12, 2009



Steel Import Monitoring and Analysis (SIMA) System  
Comments on the Proposed Rule to  
Extend the Current SIMA System Until March 21, 2013



By

American Iron & Steel Institute  
Cold Finished Steel Bar Institute  
Committee on Pipe & Tube Imports  
Metals Service Center Institute  
Specialty Steel Industry of North America  
Steel Manufacturers Association  
United Steelworkers  
Wire Rod Producers' Coalition

CPTI

THE COMMITTEE  
ON PIPE AND TUBE  
IMPORTS



The above listed trade groups and union (hereinafter referred to as the industry), on behalf of their members in the United States, respectfully submit these comments on the proposed rule to extend the SIMA, issued by the Department of Commerce on December 12, 2008 as 73FR 75,624-75,625. These organizations represent companies and workers engaged in the overwhelming majority of steel production and distribution in the United States.

We thank the Department for recognizing the importance and value of the SIMA program, and for proposing to extend it for four years until March 21, 2013 in the improved and expanded form as implemented in 2005. This program is a critical component to the government's ability to closely monitor steel imports on a near real-time basis, and the industry has also found that the SIMA provides significant benefits in the areas of timeliness and detail of data well in advance of the official statistics from the Bureau of the Census.

The SIMA, in fact, provides transparency for all interested parties -- including the industry, government, importers and steel consumers. It is especially important in this current period of global economic crisis and unprecedented economic uncertainty that all interested parties have access to steel import statistics at the earliest possible date. The SIMA provides the only comprehensive means to that end. Further, it has been thoroughly demonstrated that, even in times of relative economic prosperity, there are dynamics in steel import flows that must be identified as early as possible.

**WIRE ROD  
PRODUCERS'  
COALITION**

There is no significant burden on the steel importing community to comply with the SIMA. That has been confirmed over the past four years of the SIMA in its current and proposed extended form, and in the time before 2005 when the SIMA was in its more basic format.

The industry believes that four years covers a significant span in the ever changing and dynamic steel market. However, the industry continues to strongly advocate for the establishment of a permanent SIMA program, which would be administered by the Department. This monitoring program has proven to be a highly effective tool in analyzing import trends. We believe, through its extension, the program will continue to provide benefits to the steel and trade community. The industry looks forward to working with the Department and the new Administration regarding its permanent continuation.

Thank you for the opportunity to offer comments, and for your diligent attention to the trade concerns of America's steel industry and its workers.