



**GODFREY LUMBER COMPANY, INC.**

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October 6, 2003

The Honorable James J. Jachum  
Assistant Secretary for Import Administration  
US Dept. of Commerce, Central Records Unit, Room 1870  
Pennsylvania Avenue & 14<sup>th</sup> Street, NW  
Washington, DC 20230  
Attn: Section 201 Duties

**RECEIVED**  
OCT - 8 2003  
DEPT. OF COMMERCE  
ITA  
IMPORT ADMINISTRATION

Dear Assistant Secretary Jochum:

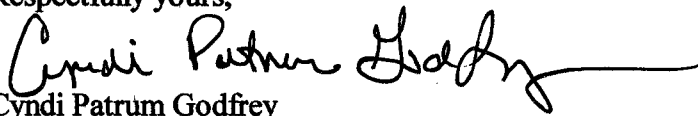
As a U.S. lumber manufacturer, we compete in the open market for raw material and through multiple processes make log home siding, paneling and window and door trim. If we aren't successful in competing on the front end, then our process is without cause. The bottom line is, we must account for all costs when evaluating whether our sales have actually yielded a profit. Lately, profit is a word that is becoming extinct in not only manufacturing but also all wood products from the US.

The Department of Commerce currently calculates anti-dumping duties failing to account for all the costs that a foreign producer might bare because countervailing duties are not calculated in the formula. As is currently in the case with softwood lumber from Canada, domestic producers are faced with dumping by an importer who is also highly government subsidized. The offset to the government subsidy, the countervailing duty, accounts for what that producer should legitimately be paying for timber. Therefore, including it in the formula for calculation anti-dumping rates is essential.

Both Canada and the European Union follow the policy of counting duty as a cost in calculating dumping and the US should as well. This is a critical issue for our company and that is why we are responding to your request for comments on the policy in the Sept.9 Federal Register. Godfrey Lumber Company, Inc. employs approximately 30 people. **However, largely due to imports, we just recently laid off 29 employees.**

We ask the Department of Commerce to amend its policy and begin treating duties as a cost.

Respectfully yours,

  
Cyndi Patrum Godfrey  
Godfrey Lumber Company, Inc.