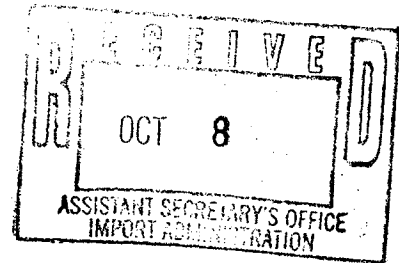


October 7, 2003

The Honorable James Jochum
Assistant Secretary for Import Administration
U.S. Department of Commerce
Central Records Unit, Room 1870
Pennsylvania Avenue and 14th St. NW
Washington, DC 20230



Attention: Treatment of Section 201 and Antidumping Duties

Dear Mr. Jochum:

Weyerhaeuser Company appreciates the opportunity to comment on the proposal to change the current methodology for calculating Section 201 and antidumping duty rates. We want to register our strong opposition to the suggested changes.

As the largest softwood lumber producer in North America and a company with over eighty percent of our assets in the United States, we believe strongly that trade remedy laws should be used sparingly and fairly and the focus should be on the expansion of free trade and the encouragement of common international trade rules.

In our view this proposal, to deduct countervailing duties and Section 201 duties from the U.S. price in dumping margin calculations, contravenes not only the intent and policy of our trade remedy laws, but we are also advised by counsel that it violates the explicit provisions of these laws. More generally, it is contrary to our international agreement obligations and would seriously undermine U.S. trade policy initiatives to reduce world trade barriers. Specifically with regard to the softwood lumber dispute with Canada, if this action were to be implemented, it would seriously jeopardize efforts to reach a negotiated settlement and signal that policies will be used to punish Canadian suppliers rather than deal fairly with them. Application of the proposed practice would cause a double adjustment in favor of petitioning U.S. industries rather than moving to "level the playing field" as the current methodology is designed to do.

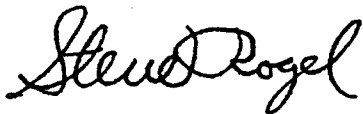
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If this change were to be implemented retroactively through the administrative review process of the current dispute, it would negatively impact the earnings of Weyerhaeuser Company and other U.S. based firms involved in the dispute without providing opportunity for market adjustments. We believe such adjustments should be a fundamental principle of trade dispute remedies.

Looking forward, if this action were to be taken, the impact would be to significantly increase duties established by current rules. The primary targets would be lumber and steel--two staples of the construction industry. Since construction is one facet of the economy which has continued to be reasonably strong, I believe to even consider actions which would unnecessarily raise the costs for the sector at this time would be risky and counterproductive.

We trust that the Commerce Department will upon completion of this review recognize that the changes proposed would be inappropriate.

Sincerely,

A handwritten signature in black ink, reading "Steven Rogel". The signature is written in a cursive, flowing style.

Steven R. Rogel, Chairman
President and CEO