

October 7, 2003

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

Attention: Treatment of Section 201 and Antidumping Duties

Dear Assistant Secretary Jochum:

On behalf of Vivco Components, I would like to comment on the proposal to change the current methodology for calculating Section 201 and antidumping duty rates.

Vivco Components is a truss manufacturer based in Missouri. We employ 25 and have annual sales of approximately \$2 million. As a significant user of softwood lumber for our products we find ourselves directly and negatively affected by duties imposed as a result of the ongoing dispute with Canada. Further, we are directly impacted by the steel tariffs through the impact those have had on our raw material costs. We believe U.S. trade laws should be used fairly and the focus should be on the expansion of free trade, and the encouragement of common international trade rules.

I am strongly opposed to the proposal to deduct countervailing duties and section 201 duties from the U.S. price in dumping margin calculations. It is contrary to the intent and letter of our trade remedy laws. I understand it would also be contrary to our international obligations and efforts to reduce world trade barriers.

Clearly the long-term answer to these disputes is to directly address the problems and to find an enduring answer. I simply cannot make the necessary long-term business decisions in this period of uncertainty and with our trade policies seemingly "blowing in the wind". If implemented, I must assume efforts to resolve the ongoing softwood lumber dispute with Canada will be finished. Certainly, Canada will receive a loud and strong signal that polices will be used to punish Canadian suppliers rather than deal fairly with them. Clearly the application of the proposed practice would cause a double penalty.

Please consider the numerous downside risks to this proposed rule. Of utmost concern to me is that the primary targets would be lumber and steel -- two staples of the truss manufacturing industry. Since construction is one facet of the economy which has continued reasonably strong you may directly erode that strength and have a profound and negative effect.

In conclusion, I appreciate the opportunity to comment on these proposed changes and urge the Commerce Department to maintain the current rules. Should you wish to learn more about our perspective please give me a call.

Sincerely,

A handwritten signature in black ink, consisting of several large, overlapping loops and strokes, positioned below the word "Sincerely,".