

I am writing on behalf of the Canadian Steel Producers Association (CSPA).

As you know the CSPA strongly supports the continuation of the U.S. Steel Import Monitoring and Analysis System. At the same time we continue to support efforts to explore opportunities to streamline administrative aspects of the system for NAFTA partners to reflect the nature of intra-NAFTA steel trade with its focus on just in time delivery.

Canadian steel imports enter the U.S. mainly by truck with the remainder by rail car. This results in a large volume of permit requests, posing a heavy administrative burden on customs brokers. The results are a heavier administrative burden and higher costs for NAFTA partners, and delays in seeking permits given the heavy volume on the Department's computer resources. I understand some customs brokers now only use afternoon shift employees because computer response is faster after the end of the business day.

As you may know the NAFTA steel industry has made proposals in this regard to NAFTA governments through the North American Steel Trade Committee. These proposals are under consideration by NAFTA governments. The need to examine opportunities to streamline administrative aspects of the system for NAFTA partners is further heightened by the Security and Prosperity Partnership announced recently by President Bush, Prime Minister Martin and President Fox. We believe NAFTA governments need to work with NAFTA steel producers to develop "ways to minimize the burden of collection" on respondents as suggested in your request for comments.

For our part I can assure you that the CSPA would welcome the opportunity to explore streamlining proposals with you.

I thank you in advance for your consideration and look forward to your response.

Yours sincerely