



April 29, 2005

Mr. Kelly Parkhill  
Director of Industry Support and Analysis  
Import Administration, Room 3713  
Department of Commerce  
14<sup>th</sup> and Constitution  
Washington, DC 20230

**RE: Comments on the Interim Final Rule**

Dear Mr. Parkhill:

I am writing to day to provide comment(s) on:

- Steel Import Monitoring and Analysis System
- Interim final rule
- FR Friday March 11, 2005

These regulations are obviously quite welcome by the steel industry, and IPSCO does join in endorsing the continuation of the import monitoring system. We believe that the four-year extension is appropriate in order to further evaluate the usefulness of the program.

In addition as a steel manufacturer that does business almost exclusively in the U.S. and Canada we see a very specific benefit from harmonizing the U.S. and Canadian import monitoring programs. Although the systems do not match in their entirety we believe that keeping the U.S. system in place promotes further integration of the U.S. and Canadian steel markets.

The expansion of the program to cover more steel mill products further helps to harmonize the U.S. and Canadian systems and provides information that will be helpful in identifying trends in imports of steel products.

This ability to analyze import trends would be further enhanced by reporting product detail at the 10-digit HTS level. Although the Department has proposed reporting at the 6-digit level at this time, we believe significant detail could be added by going to the 10 digit reporting level. We believe that it is possible to achieve the level of proprietary protection that the Department is seeking by adding a few safeguards to the report. We are aware that AISI uses safeguards when publishing its statistical reports. The AISI methodology might be easily adapted to the steel

**ipSCO enterprises inc.**

650 Warrenville Road, Suite 500, Lisle, Illinois 60532  
Phone (630) 810-4800 Fax (630) 810-4600



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import monitoring program, providing both helpful detail, and protection to commercial interests as necessary. We urge the Department to examine the safeguards that AISI uses to see if they might be adapted for use by the Department.

We believe transparency and full disclosure is key to establishing rules based trade in the global steel market. By extending the steel import monitoring program the Department of Commerce has moved the country and the industry in the right direction.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Comrie".

John Comrie Q.C.  
Director Trade Policy & Communications and  
Assistant Secretary