

MAN Ferrostaal Incorporated



April 22, 2005

Mr. Kelly Parkhill
Director for Industry Support and Analysis
Import Administration
US Department of Commerce
Room 3713
14th Street and Constitution Avenue NW
Washington, DC 20230

Re: Steel Import Monitoring and Analysis System – Comments

Dear Mr. Parkhill:

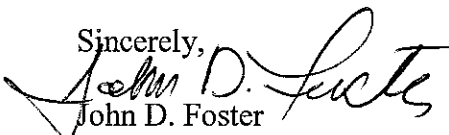
These comments are submitted on behalf of MAN Ferrostaal, Incorporated regarding the Department's Steel Import and Monitoring Analysis (SIMA) system. Commerce invited comments in its *Federal Register* notice of its interim final rule on March 17, 2005 (70 Fed. Reg. 12, 133).

While I endorse the decision to include carbon, stainless and other alloy steel drawn wire in the revised SIMA system, which will be implemented on June 9, 2005, I am also requesting that Commerce extend coverage of its import monitoring program to include the following categories of steel wire products:

1. Steel wire strand, rope and cable (HTS 7312)
2. Barbed wire (HTS 7313)
3. Steel wire cloth, grill, netting and fencing (HTS 7314)
4. Steel wire nails and staples (HTS 7317)
5. Steel springs (HTS 7320)
6. Steel wire garment hangers (HTS 7326.20.020)

Coverage of wire products is essential to the effectiveness and integrity of the SIMA system. For more information and justification for this request, please refer to the comments submitted by the American Wire Producers Association (AWPA), of which my company is a member. I concur completely with the comments submitted.

Sincerely,


John D. Foster
Vice President / C.O.O.

JDF/ph

16510 Northchase Drive

Houston, Texas 77060

Telephone: (281) 999-9995

Telefax, Steel Division: (281) 999-4143
Telefax, Administration: (281) 591-1837

Telefax, Technical Division: (281) 447-5216
Telefax, Credit: (281) 878-0729



**AMERICAN
WIRE
PRODUCERS
ASSOCIATION**

*"Steel Wire and Wire Products
for North America and the World"*

801 North Fairfax Street
Suite 211
Alexandria, VA 22314-1757

Phone: 703-299-4434
Fax: 703-299-9233
Email: info@AWPA.org

Kimberly A. Korbel
Executive Director

**WHITE PAPER
STEEL IMPORT MONITORING AND ANALYSIS (SIMA) SYSTEM**

I. Summary

The US Department of Commerce (Commerce) released its proposed interim rule to modify and extend the current Steel Import Monitoring and Analysis (SIMA) system. Commerce is expanding coverage of the SIMA system to include all basic steel mill products, and is extending this modified system for four more years. AWPA member companies support this program and asked their Congressmen and women for support. Over 100 legislators wrote to Commerce to request the program be extended and most requested that rod, wire and wire products be included in the coverage of the program. While rod and wire were included in this interim rule; wire products were not. Commerce has requested comments on this interim rule by May 10, 2005.

II. Background

The current Steel Import Monitoring and Analysis (SIMA) system was put in place in conjunction with the safeguard measures which the President imposed on imports of certain categories of steel products in March 2002. The purpose of this system is to provide accurate and timely information on imports of steel products. When the President terminated the safeguard measures in December 2003, he instructed the US Commerce Department to continue this monitoring system until March 21, 2005, or until a replacement program had been established.

III. AWPA Position

The AWPA supports the continuation of the SIMA program, and is again urging Commerce to modify the scope of the current system to include wire products, including wire strand and rope; barbed wire; wire cloth, grill, netting and fencing; springs; garment hangers; and nails and staples.

We are asking our legislators to submit comments to the US Department of Commerce, in this regard. A sample letter and AWPA's comments are enclosed. If you have questions, or need more information, contact AWPA's Director of Government Affairs, Janet Kopenhaver, at 703-528-7822 or via email at jkopenhaver@awpa.org.