

April 20, 2010

VIA E-MAIL

Honorable Ronald K. Lorentzen  
Deputy Assistant Secretary for Import Administration  
Room 1870  
Department of Commerce  
14th Street and Constitution Ave., NW,  
Washington, DC 20230

Attention: Kelly Parkhill, Supervisory Import Policy Analyst

Re: Report to Congress: Retrospective versus Prospective Antidumping and  
Countervailing Duty Systems; Comments of Gerda Ameristeel

Dear Mr. Lorentzen:

In response to the Commerce Department's notice of March 31, 2010 (75 Fed. Reg. 16079), we note that Gerda Ameristeel supports the comments filed by the Steel Manufacturers Association on this subject, and also supports the continued use of a retrospective system for calculation and assessment of antidumping and countervailing duties.

For reasons fully explained in the SMA filing, we believe that the current retrospective system is the most accurate method of assessing and collecting duties on unfairly traded goods, and therefore is most consistent with the trade remedy laws and their purpose. In our view, a prospective system does not offer advantages or improvements to the current system.

Thank you in advance for your consideration of these comments.

Very truly yours,



Robert E. Lewis  
Vice President, General Counsel