



**CPTI**

THE COMMITTEE  
ON PIPE AND TUBE  
IMPORTS



**WIRE ROD  
PRODUCERS  
COALITION**

December 13, 2012

The Honorable Rebecca Blank  
Acting Secretary of Commerce  
Attn: Steven Presing  
Director for Industry Support and Analysis  
Import Administration, Room 2845  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, DC 20230

RE: Comments on Proposed Rule to Extend the Steel Import Monitoring and Analysis (SIMA) System

Dear Secretary Blank:

The undersigned steel industry groups and union (hereinafter referred to as the industry), on behalf of their members in the United States, respectfully submit these comments on the proposed rule to extend the Steel Import Monitoring Analysis (SIMA) System as published by the Department of Commerce in the *Federal Register* on November 13, 2012 at 77 Fed. Reg. 67,593-95. These organizations represent companies and workers engaged in the overwhelming majority of steel production and distribution in the United States.

We thank the Department for recognizing the importance and value of the SIMA program, and for proposing to extend it for an additional four years until March 21, 2017. This program is a critical component of the government's ability to closely monitor steel imports on a near real-time basis, and the industry has also found that SIMA provides significant benefits in the areas of timeliness and detail of steel import data that is published well in advance of the official reported statistics from the Census Bureau.

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The SIMA provides transparency for all interested parties, including the industry, government, importers and steel consumers. It is especially critical in this current period of a slowdown in global economic activity and increased uncertainty that all interested parties have access to steel import statistics at the earliest possible date. The SIMA provides the only comprehensive means to that end. In addition, it has been thoroughly demonstrated that, even in times of relative economic prosperity, there are dynamics in steel import flows that must be identified as early as possible.

There is no significant burden on the steel importing community to comply with the SIMA. That has been confirmed over the past eight years of the current SIMA program and proposed extended form, and in the time prior to 2005 when the SIMA was in its more basic format.

The industry believes that four years covers a significant span in the ever-changing and dynamic steel market. However, the industry continues to strongly advocate for the establishment of a permanent SIMA program, which would be administered by the Department. This monitoring program has proven to be a highly effective tool in analyzing import trends. We believe that, through its extension, the program will continue to provide benefits to the steel and trade communities. The industry looks forward to working with the Department and Administration regarding its permanent continuation.

Thank you for the opportunity to offer comments and for your diligent attention to the trade concerns of America's steel industry and its workers.

Sincerely,

American Iron and Steel Institute  
Cold Finished Steel Bar Institute  
Committee on Pipe and Tube Imports  
Metals Service Center Institute  
Specialty Steel Industry of North America  
Steel Manufacturers Association  
United Steelworkers  
Wire Rod Producers Coalition