

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, N.W.
Washington, DC 20006-4706
www.kslaw.com

Gilbert B. Kaplan
Direct Dial: (202) 661-7981
Direct Fax: (202) 626-3737
gkaplan@kslaw.com

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Kelly Parkhill
Director for Industry Support and Analysis
Import Administration
Room 3713
U.S. Department of Commerce
14th and Constitution Ave., NW
Washington, DC 20230

PUBLIC DOCUMENT

Re: Comments On Proposed Rules: Steel Import Monitoring And Analysis System

Dear Mr. Parkhill:

On behalf of the John Maneely Companies (“JMC”), including Wheatland Tube, Sharon Tube and Atlas Tube, we submit the following comments on the Department of Commerce’s (“the Department”) Federal Register notice regarding Proposed Rules: Steel Import Monitoring and Analysis.¹ JMC strongly supports the Department’s proposal to extend the Steel Import Monitoring and Analysis (“SIMA”) system beyond its current expiration date.

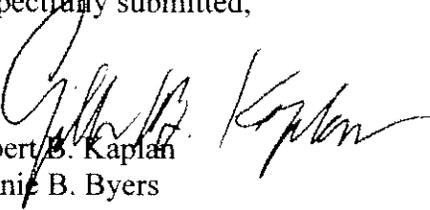
¹ *Proposed Rules: Steel Import And Analysis System*, 73 Fed. Reg. 75,624 (Dec. 12, 2008).

On December 5, 2005, the Department published its final rule on the current SIMA system.² Under the current rule, the SIMA system is set to expire on March 21, 2009. JMC supports the Department's proposal to extend the SIMA system for an additional four years. The SIMA system is a valuable "early warning" tool that offers timely preliminary volume and value import data. In fact, JMC typically reviews SIMA data on an almost daily basis. These data allow JMC to have an accurate estimate of what the official volume and value of imports will be for pipe and tube products entering the United States.

Specifically, the user-friendly format of the SIMA system allows JMC to review volume and pricing of imports by country. The data provide an accurate indication of which countries are increasing their imports and at what price on a nearly real time basis. This is particularly important in the import-sensitive steel products sector. In addition, the monthly historical data allows us to anticipate inventory overbuild.

Please contact us if you have any questions regarding this submission.

Respectfully submitted,


Gilbert B. Kaplan
Bonnie B. Byers

² *Final Rule: Steel Import And Analysis System*, 70 Fed. Reg. 72,373 (Dec. 5, 2005).