

Stelco Inc., a Canadian steel producer and importer of rolled steel products into the USA, wishes to comment on just one aspect of the Department's Interim final rule, that is, on item d) included in the Department's 'Request for Comments' dated March 11, 2005. Item d) requests views on: "ways to minimize the burden of collection on respondents, including through the use of automated collection techniques or forms of information technology".

Steel importers from Canada likely request daily the largest volume of permits requested by any country supplying customers in the U.S.A. That arises because the preponderance of Canada-sourced steel imports enter the commerce of the U.S.A. by truck with the remainder likely all by railcar. The sheer volume of permit requests poses a load on both the customs brokerage firms applying for the permits and on the Department's computer resources. Some customs brokers have resorted to using only afternoon shift employees because the computer response is greater after the end of the normal work day.

The volume of applications impacting the Department's computer system could be greatly reduced through the use of 'blanket' permits given to qualifying (perhaps just C-TPAT-approved and greater than a specific number of applications per week) importers that commit to providing the Department a summary report of volumes and revenues by HS code at the end of each week. Such a report would be more accurate than the summation of hundreds of individual permits and allow the Department to use fewer computer resources to compile and report of the volumes and values of steel import permit applications. Approved respondents would be provided this privilege only as long as they provide the weekly summary report promptly each week. The risk of withdrawal of this privilege should be sufficient to keep the summary responses prompt.

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