

AMERICAN INSTITUTE OF STEEL CONSTRUCTION, INC.

One East Wacker Drive Suite 3100 Chicago, Illinois 60601-2001 (312) 670-2400

DAVID B. RATTERMAN
Secretary

RESPOND TO:

DAVID B. RATTERMAN
STITES & HARBISON, PLLC
SUITE 1800
400 WEST MARKET STREET
LOUISVILLE, KY 40202
(502) 681-0539

September 24, 2004

BY HAND DELIVERY

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

Re: Request for Comments on Steel Import Monitoring and Analysis System

Dear Mr. Parkhill:

These comments are submitted on behalf of the American Institute of Steel Construction, Inc. ("AISC") in response to the Department of Commerce's ("the Department") request for comments on the continuation of the Steel Import Monitoring and Analysis System ("SIMA"), 69 Fed. Reg. 52,211 (August 25, 2004). AISC is a non-profit trade association and technical institute established in 1921 to serve the structural steel industry in the United States, and counts as members the leading U.S. fabricators of structural steel products. AISC strongly supports the expansion of SIMA to cover fabricated structural products, as well as making SIMA permanent.

AISC's members produce a variety of structural steel products. Many of these products, including fabricated structurals, are not currently covered by SIMA. A joint submission of the American Iron and Steel Institute, the Steel Manufacturers Association, and several other trade groups is identifying a number of steel products classified under HTS chapters 72 and 73 as meriting inclusion within SIMA. The specific products include those classified under HTS headings 7216 (steel angles, shapes and sections), 7301 through 7307 (rails, structurals, pipe and tubes, and fittings and flanges) and heading 7308 (fabricated structurals). Extension of SIMA to cover these products, including fabricated structurals, will allow members of the U.S. fabricated structural steel industry to identify possible import surges and instances of dumping, and take action accordingly.

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SIMA is currently slated to expire in March 2005. However, both President Bush and Secretary Evans have stated that the system should be made permanent. Obtaining an early warning of potential import problems through SIMA is an essential safeguard for the U.S. fabricated structurals industry. Moreover, SIMA is fully consistent with the international obligations of the United States, and does not restrict imports into the United States in any way. AISC strongly urges the Department to make SIMA permanent by eliminating the March 2005 deadline for its termination.

I would be pleased to meet with Department officials to discuss these comments. We thank you in advance for your consideration of our comments.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David B. Ratterman". The signature is fluid and cursive, with a long horizontal stroke at the end.

David B. Ratterman
General Counsel
American Institute of Steel Construction, Inc.

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