

AMERICAN INSTITUTE OF STEEL CONSTRUCTION

130 E. Randolph Street, Suite 2000, Chicago, IL 60601
www.aisc.org



March 2, 2018

Honorable Donald J. Trump
President of the United States
The White House
1600 Pennsylvania Avenue NW
Washington, DC 20500

Re: Section 232 Tariffs and Fabricated Structural Steel Imports

Dear President Trump:

The American Institute of Steel Construction (AISC) appreciates the work of the Administration and the Department of Commerce to protect the American steel industry through the planned imposition of tariffs under the process described in section 232 of the Trade Expansion Act.

AISC has been an active participant in the 232 investigation on steel imports, testifying at the Commerce Department hearing in May 2017 and submitting post-hearing information to Commerce. Our primary argument has been that the critical tie between steel imports and national security is in America's Critical Infrastructure – an argument that was adopted by and featured prominently in the Commerce Department Report.

However, as the implementing Order is finalized, we are urging one critically important modification to the Commerce report: Include fabricated structural steel in the products covered by the tariff.¹

Otherwise, the effects of any tariffs will be too easily subject to circumvention by offshore fabricators, who will be able to buy steel at tariff-free prices, transform it into fabricated steel products for critical infrastructure components, and then import those components around the tariffs below the cost of domestic fabrication.

AISC has consistently advocated for a long-term, well-funded infrastructure investment plan, with strong Buy America provisions, as both a national economic priority and a national security issue. Our 1,000 members are U.S. businesses – many of which are small businesses -- that produce, distribute, fabricate and install structural steel for America's great bridges, infrastructure projects and skylines. We estimate that the U.S. structural steel industry directly supports about 200,000 jobs, of which 82,000 are in fabrication -- the most labor-intensive part of steel construction.

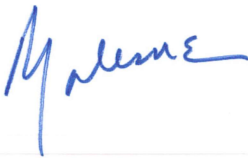
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On behalf of our Membership, AISC thanks the Administration for its support of the domestic steel industry, and requests that fabricated steel be included in the implementing Order to ensure that the tariffs imposed on mill products are not circumvented by downstream fabricated products.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles J. Carter".

Charles J. Carter, S.E., P.E., Ph.D.
President
American Institute of Steel Construction

A handwritten signature in blue ink, appearing to read "David Zalesne".

David Zalesne
Chair, AISC Board of Directors
President
Owen Steel Company, Inc., Columbia, SC

¹ Fabricated structural steel is covered generally by HTS Codes 730810 and 730890. More specifically, fabricated steel is defined to include carbon and alloy steel products such as angles, columns, beams, girders, plates, flange shapes (including manufactured structural shapes utilizing welded plates as a substitute for rolled wide flange sections), channels, hollow structural section (HSS) shapes, base plates, trusses, joists, joist girders, decking, piling, plate-work components, and other steel products that have been fabricated such that they are suitable for assembly or installation into a structure (fabricated structural steel).