

## Objection Filing to Posted Section 232 Exclusion Request: Steel

**Objection Filing Requirements:** Any individual or organization in the United States may file an Objection to an Exclusion Request. Where relevant, organizations must provide factual information on 1) the steel products that they manufacture in the United States, 2) the production capabilities at steel manufacturing facilities that they operate in the United States; and 3) the availability and delivery time of the products that they manufacture relative to the specific steel product that is subject to an Exclusion Request. For an Objection Filing to be considered, it must be submitted as an electronic document using this Excel-based template. Paper submissions will not be accepted.

Organizations submitting an Objection Filing on an Exclusion Request should provide specific information, as relevant, on the product that their company can provide that is comparable to the steel product that is the subject of the Exclusion Request. This information should include 1) discussion on the suitability of its product for the application identified by the Exclusion Requestor, and 2) a full technical description of the properties of the product it manufactures relative to specifications provided in the Exclusion Request posted on regulations.gov, including information on dimensions, strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data.

A separate Objection Filing must be submitted on each Exclusion Request, citing the specific steel product and dimension covered in the request posted on regulations.gov. All applicable question blocks in this form must be completed for the Objection Filing to be accepted for consideration. Organizations electing to attach supporting documents must provide a single submission only in PDF format that must not exceed 25 pages in total. All information submitted in the Exclusion Request is subject to public disclosure. Do not provide sensitive Personally Identifiable Information.

Organizations should upload their Objection Filing covering a single steel Exclusion Request to the corresponding Exclusion Request on <https://www.regulations.gov/> under Docket Number BIS-2018-0006. An Objection Filing must be submitted to regulations.gov no later than 30 days from the date the Exclusion Request is posted in regulations.gov. Processing of the Exclusion Request, including consideration of Objection Filings, will take approximately 90 business days. When Exclusion Requests are approved, notification will be made on regulations.gov. For questions related directly to completing this form, contact BIS via email ([steel232@bis.doc.gov](mailto:steel232@bis.doc.gov)) or telephone (202-482-5642).

**Instruction:** State the name, address, and related contact information for the organization submitting the Objection Filing. Provide the same information for the Exclusion Requestor that is the subject of this Objection Filing, relying on information in the request notice posted on regulations.gov. Also provide the regulations.gov identification number issued for the submitter of the Exclusion Request, the HTSUS code for the steel product, and annual quantity of imported steel product at issue. This information is found in the Exclusion Request document posted on regulations.gov.

**Organization Filing Objection to Requested Exclusion**

**Organization Requesting Exclusion**

|                                  |                              |                     |  |   |  |  |
|----------------------------------|------------------------------|---------------------|--|---|--|--|
| 1.a                              | Full Organization Legal Name |                     |  | Full Organization Legal Name                    |  |  |
|                                  | Street Address               |                     |  | Street Address                                  |  |  |
|                                  | City                         |                     |  | City  |  |  |
|                                  | State                        |                     |  | State   |  |  |
|                                  | Zip Code                     |                     |  | Zip Code  |  |  |
|                                  | Headquarters Country         |                     |  |   |  |  |
|                                  | Point of Contact Name        |                     |  |   |  |  |
|                                  | Phone Number                 |                     |  |   |  |  |
|                                  | E-mail Address               |                     |  |   |  |  |
|                                  | Web Site Address             |                     |  |   |  |  |
| regulations.gov Identification # |                              | 10-Digit HTSUS Code |  | Annual Exclusion Quantity Requested (Kilograms) |  |  |

Identify the reasons your organization objects to an Exclusion Request being granted to the applicant cited above. Written comments may be submitted (not required) to supplement information that your organization has provided in the Objection Filing form on the Exclusion Request, but total attachments may not exceed 25 pages. Organizations making an Objections Filing should identify factual problems that they encounter in the Exclusion Request (e.g., product description).

|     |   |  |  |
|-----|---|--|--|
| 1.b | Indicate what type of order the Exclusion Request that is the subject of the Objection Filing would pertain to: |  |  |
|     | Comments  |  |  |

|     |  |          |      |       |   |                             |
|-----|--|----------|------|-------|---|-----------------------------|
| 1.c | Is the steel product type identified in the Exclusion Request <u>currently manufactured</u> by your organization in the United States, or can it immediately be made (within 8 weeks) by your organization, in a company-owned plant in the United States? If "Yes" identify the location(s) of your steel production facilities in the United States. | -Yes/No- | City | State | Current Annual Plant Production Capacity (mt) | % Plant Utilization Current |
|     |  |          |      |       |   |                             |

|     |  |      |      |       |   |                             |
|-----|--|------|------|-------|---|-----------------------------|
| 1.d | This organization does not currently manufacture the identified steel product, but can produce the product identified in the Exclusion Request within the following time period at the following facilities: | Days | City | State | Current Annual Plant Production Capacity (mt) | % Plant Utilization Current |
|     |  |      |      |       |   |                             |
|     | Comments   |      |      |       |   |                             |

|     |   |          |      |       |   |                             |
|-----|---|----------|------|-------|---|-----------------------------|
| 1.e | Does this organization currently manufacture, or can immediately manufacture (within 8 weeks), in a company-owned plant located in the United States a <u>substitute product</u> for the identified steel product that has similar form, fit, function, and performance? If "Yes" identify the location(s) of your steel production facilities in the United States, current plant capacity and utilization | -Yes/No- | City | State | Current Annual Plant Production Capacity (mt) | % Plant Utilization Current |
|     |   |          |      |       |   |                             |

|     |   |      |      |       |   |                             |
|-----|---|------|------|-------|---|-----------------------------|
| 1.f | This organization does not currently manufacture the identified steel product, but can make a <u>substitute product</u> that has similar form, fit, function, and performance within the following time period at the following facilities: | Days | City | State | Current Annual Plant Production Capacity (mt) | % Plant Utilization Current |
|     |   |      |      |       |   |                             |
|     | Comments  |      |      |       |   |                             |



**Objection Filing to Posted Section 232 Exclusion Request: Steel - Continued**

|     |  |                        |  |                      |  |                      |  |
|-----|--|------------------------|--|----------------------|--|----------------------|--|
| 2.a | Select "Yes" for any assertions identified in the Exclusion Request that your organization is challenging: | No Production Capacity |  | Product Quality      |  | Shipping Time        |  |
|     |  | Insufficient Volume    |  | Unique Steel Product |  | Other (specify here) |  |

2.b Discuss 1) the suitability of your organization's steel product compared to that identified by the Exclusion Requestor, and 2) provide a full technical description of the properties of the product it manufactures relative to specifications cited in the Exclusion Request posted in regulations.gov. This description must include information on dimensions, plus performance factors such as strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data.

2.c State the chemical composition of the specific steel product that your organization can manufacture at a company-owned production facility located in the United States. Numbers may appear rounded, but full values will be stored.

| Chemical Composition |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |
|----------------------|----------|----------|-------------|----------|---------|----------|-----------|----------|----------|----------|-----------|----------------------|----------------------|--|
| Chemical             | Aluminum | Antimony | Bismuth     | Boron    | Carbon  | Chromium | Cobalt    | Copper   | Iron     | Lead     | Manganese | Molybdenum           | Nickel               |  |
| Minimum %            |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |
| Maximum %            |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |
| Chemical             | Niobium  | Nitrogen | Phosphorous | Selenium | Silicon | Sulfur   | Tellurium | Titanium | Tungsten | Vanadium | Zirconium | [Other - List Below] | [Other - List Below] |  |
| Minimum %            |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |
| Maximum %            |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |
| Comments:            |          |          |             |          |         |          |           |          |          |          |           |                      |                      |  |

2.d Provide the following information on the single steel product that is the subject of this Objection Filing: 1) dimensional information covering the single steel product subject to the Exclusion Request; 2) performance data for tensile strength, yield strength, hardness, impact, shear and test temperature. Numbers may appear rounded, but full values will be stored.

| Steel Product Specifications (Millimeters) |                 |                  |        |       |        |                                       | Strength                            |  |                  | Toughness (If Applicable)   |                            |  |  |
|--|-----------------|------------------|--------|-------|--------|---------------------------------------|-------------------------------------|--|------------------|-----------------------------|----------------------------|--|--|
| Thickness                                  | Inside Diameter | Outside Diameter | Length | Width | Height | Tensile Strength<br>Mega Pascal (MPa) | Yield Strength<br>Mega Pascal (MPa) | Hardness<br>(specify method below - Brinnell, Rockwell, Vickers, etc.) | Test Type        | Drop-Weight<br>Tear Testing | Impact (Charpy)<br>Testing | Other<br>(specify type in comment box) |  |
|  |                 |                  |        |       |        |                                       |                                     |  | Temperature (°C) |                             |                            |  |  |
| Minimum                                    |                 |                  |        |       |        |                                       |                                     |  | Joules           |                             |                            |  |  |
| Maximum                                    |                 |                  |        |       |        |                                       |                                     |  | % Shear          |                             |                            |  |  |
| Comments:                                  |                 |                  |        |       |        |                                       |                                     |  |                  |                             |                            |  |  |

2.e Provide the following information on the single steel product that is the subject of this Objection Filing: 1) performance data for ductility, magnetic permeability, surface finish; and 2) metal coating process, material type, weight, and thickness. Numbers may appear rounded, but full values will be stored.

| Global Ductility                               |                      | Local Ductility (If Applicable) |  | Magnetic Permeability (If Applicable) |  |  | Surface Finish (If Applicable) |                | Coating Type and Composition (If Applicable) |  |                              |                                 |  |
|--|----------------------|---------------------------------|--|---------------------------------------|--|--|--------------------------------|----------------|--|--|------------------------------|---------------------------------|--|
| Elongation %                                   | Reduction -in-Area % | Hole Expansion %                | Bendability (Bend Radius/Sheet Thickness [millimeter]) | Magnetic Permeability [Epstein Test]  | Magnetic Permeability [Greer Lab Method] | Stacked Wide Sheet [ASTM A804/A804M-04 (2015)] | Profilometer - [SAE J911]      | Coating Method | Coating Product Name and Abbreviation        | Composition (e.g., Zn, Al, Si, Mg, other intentionally added elements or alloys) | Weight [Grams per Sq. Meter] | Coating Thickness [micrometers] |  |
| Minimum  |                      |                                 |  |                                       |  |  |                                |                |  |  |                              |                                 |  |
| Maximum  |                      |                                 |  |                                       |  |  |                                |                |  |  |                              |                                 |  |
| Select any additional processing methods used: |                      |                                 |  |                                       |  |  |                                |                |  | Other (specify)  |                              |                                 |  |
| Comments:                                      |                      |                                 |  |                                       |  |  |                                |                |  |  |                              |                                 |  |

**Objection Filing to Posted Section 232 Exclusion Request: Steel - Continued**

|  |  |  |
|--|--|--|
| 3.a  | What percentage of the total steel product tonnage requirement covered under the Exclusion Request that is the subject of this Objection Filing can your organization manufacture at its U.S. plants on a timely basis?  |  |
| 3.b  | State the number of days required by your organization to ship from its U.S. manufacturing plant the steel product covered by this Exclusion Request from the time the purchase order is received:   |  |
| 3.c  | State the number of days required to manufacture the steel product covered by this Exclusion Request from the time a binding purchase order is received:   |  |
| 3.d  | State the delivery time in days for the steel product covered under this Exclusion Request from the time it is shipped from your manufacturing plant to the Exclusion Requestor's loading dock:  |  |
|  | Comments:  |  |
| 3.e  | Identify the reasons your organization objects to an Exclusion Request being granted to the applicant. Written comments may be submitted (not required) for each of the reasons your organization has cited in the Objection Filing form. Organizations filing Objections should identify factual problems in the Exclusion Request (e.g., product description). |  |
|  | Comments:  |  |
| 3.f  | Has the organization making the Exclusion Request asserted that there is no capability in the United States to manufacture this type of steel product it requires? If "Yes" provide comments in the space below.   |  |
|  | Has the Exclusion Requestor supported its assertion of product uniqueness with engineering and scientific data, or independent laboratory tests results?   |  |
|  | Does your organization have technical data to disprove the assertions of the Exclusion Requestor? If "Yes" provide comments in the space below, or in attachments.   |  |
|  | Comments:  |  |
| 3.g  | Has the organization making this Objection Filing within the last two years attempted to sell, or successfully sold, the steel product described in the Exclusion Request to the exclusion requestor previously?   |  |
|  | Does your organization manufacture a steel product similar to that cited in the Exclusion Request for which it has asked to Exclusion Requestor, within two years of the filing of the Exclusion Request, to perform a formal technical qualification to determine equivalency in form, fit, function and performance?   |  |
|  | Did the Exclusion Requestor accept or reject the request to perform a formal technical qualification?  |  |
|  | Comments:  |  |
| I have additional information to provide that is proprietary or otherwise business confidential that is relevant and necessary to this submission: |  |  |

**Instruction: This Objection Filing must be submitted by an organization official authorized to certify the document as being accurate and complete.**

**CERTIFICATION**

The undersigned certifies that the information herein supplied in response to this questionnaire is complete and correct to the best of his/her knowledge. It is a criminal offense to willfully make a false statement or representation to any department or agency of the United States Government as to any matter within its jurisdiction. [18 U.S.C. 1001 (1984 & SUPP. 1197)]

|  |  |                                |  |
|--|--|--------------------------------|--|
| Company Name:  |  |                                |  |
| Name of Authorizing Official:  |  | Title of Authorizing Official  |  |
| Phone Number:  |  | Email of Authorizing Official: |  |
| If the Point of Contact is different from the Authorizing Official provide point-of-contact information below. |  |                                |  |
| Point-of-Contact Name:   |  | Title                          |  |
| E-mail Address:  |  | Phone Number                   |  |

**Paperwork Reduction Act Notice**

Per the Paperwork Reduction Act of 1995, public reporting burden for this collection of information is estimated to average 4 hours per response, including the time to review instructions, search existing data sources, gather and maintain data needed, and complete and review the collection of information. Send comments regarding this burden estimate or any other aspects of this collection of information, to 1401 Constitution Avenue, NW, HCHB 1093, Office of Technology Evaluation, Bureau of Industry and Security, U.S. Department of Commerce, Washington, DC 20230 attn: 0694-0138. Commerce may not collect this information, and you are not required to respond; unless this OMB number is displayed.