

Rebuttal to Objection Filed Against Request for Exclusion from Remedies: Section 232 National Security Investigation of Aluminum Imports

Rebuttal Requirements: Only individuals or organizations who submitted a product exclusion request and where that request received objections may submit a rebuttal. For a rebuttal to be considered, the rebuttal filer must provide the Exclusion Request Identification number and the Objection to the Exclusion Request Identification number. Rebuttals must be submitted using this Excel-based document. Paper submissions will not be accepted. Please do not tamper with this Excel-based document, e.g., unprotect sheets, delete or add tabs, delete or add rows or columns, override data validation, etc. or your submission may not be accepted. A separate rebuttal Excel-based document must be submitted for each distinct objection to the exclusion request. Rebuttals will not be considered if the applicant: 1) does not sufficiently address the specified reporting requirements in sections 1.a - 2.e of the Excel-based document; 2) fails to address whether the rebuttal addresses a substitute or identical product, or 3) fails to indicate the basis for the rebuttal.

Organizations electing to attach supporting documents must provide these documents in PDF format and it must not exceed ten pages. All information submitted in the rebuttal is subject to public disclosure. If you are submitting confidential business information (CBI), please attach the public version of that document to the rebuttal, in accordance with the recent interim final rule. Please submit no more than five pages of supporting CBI documentation via email with the Exclusion Request Identification number in the subject heading and with the tracking number and name of the objecting company in the body of the message.

Organizations should upload their completed rebuttal Excel-based document pertaining to an objection to the exclusion request and any supporting documents to www.regulations.gov under Docket Number BIS-2018-0002. This form and any attached supporting documents will be made available to the public on Regulations.gov.

For questions related directly to completing this form, please contact BIS via email (Aluminum232@bis.doc.gov) or telephone (202-482-5642).

| Section | Rebuttal Against Objection Filed on an Exclusion Request | Case Information |
|---|--|---|
| 1.a | Regulations.Gov Exclusion Request Identification #, e.g., BIS-2018-0006-99999 | |
| 1.b | Objection to Exclusion Request Identification #, e.g., BIS-2018-0006-99999 | |
| 1.c | Does this rebuttal address a substitute or an identical product? | |
| 1.d | Are you submitting confidential business information with this form? (If yes, please email it to 232rebuttals@doc.gov and submit the public version along with this form. Confidential business information related to this rebuttal will not be made available to the public on Regulations.gov) | |
| <i>The basis of your rebuttal is for the following reason(s):</i> | | |
| 2.a | Manufacturing Time | |
| 2.b | Quality | |
| 2.c | Available Quantity | |
| 2.d | Delivery Time | |
| 2.e | Other (limit: 100 characters) | |
| Bases for Rebuttal of Objection Filing | | Cause for Rebuttal to Objection Submission |
| 3 | MANUFACTURING TIME Challenging the objector's assertion that: | Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters) |
| 3.a | The product is currently made in the U.S. or can be manufactured at U.S. facilities within approximately eight weeks. | |
| 3.b | The objector does not currently manufacture the identified aluminum product at U.S. facilities, but states the time period within which they can do so. | |
| 3.c | The objector can currently manufacture an acceptable substitute product at U.S. facilities within approximately eight weeks. | |
| 3.d | The objector does not currently manufacture an acceptable substitute product at U.S. facilities, but states the time period within which they can produce an acceptable substitute aluminum product. | |
| 3.e | The objector can manufacture the aluminum product within the time frame stated in their objection filing. | |
| 4 | QUALITY Challenging the objector's assertion that their product is interchangeable with respect to its: | Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters) |
| 4.a | Chemical composition | |
| 4.b | Dimensional specifications | |
| 4.c | Strength | |
| 4.d | Toughness | |
| 4.e | Ductility | |
| 4.f | Magnetic permeability | |
| 4.g | Surface finish | |
| 4.h | Coatings and composition | |
| 4.i | Other technical specifications (e.g., end-use requirements) | |
| 5 | AVAILABLE QUANTITY Challenging the objector's assertion that: | Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters) |

| | | | |
|----------|---|--|---|
| 5.a | Domestic aluminum product is available in sufficient quantity. | | |
| 5.b | The objector can supply the percentage of aluminum product stated in their objection filing. | | |
| 5.c | U.S. manufacturers have the capability to manufacture the identified aluminum product. | | |
| 5.d | The objector has sold or has attempted to sell the aluminum product described in the exclusion request. | | |
| 6 | DELIVERY TIME Challenging the objector's assertion that: | | <i>Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters)</i> |
| 6.a | Domestic aluminum product is available for timely delivery from the time the purchase order is received until the product is ready to ship. | | |
| 6.b | Domestic aluminum product is available for timely delivery from manufacturing plant to loading dock. | | |

Instruction: This rebuttal must be signed by an organization official specifically 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

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: 0694-0139. Commerce may not collect this information, and you are not required to respond; unless this OMB number is displayed.