

**Surrebuttal to Rebuttal Filed Against Request for Exclusion from Remedies: Section 232 National Security Investigation of Steel Imports**

Surrebuttal Requirements: Only individuals or organizations who submitted an objection to a product exclusion request and where that objection received a rebuttal may submit a surrebuttal. For a surrebuttal to be considered, the surrebuttal filer must provide the Exclusion Request Identification number, the Objection to the Exclusion Request Identification number, and the Rebuttal to the Objection to the Exclusion Request Identification number. Surrebuttals 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 surrebuttal Excel-based document must be submitted for each distinct rebuttal to an objection to the exclusion request. Surrebuttals 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 surrebuttal addresses a substitute or identical product, or 3) fails to indicate the basis for the surrebuttal.

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 surrebuttal is subject to public disclosure. If you are submitting confidential business information (CBI), please attach the public version of that document to the surrebuttal, 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 rebutting company in the body of the message.

Organizations should upload their completed surrebuttal Excel-based document pertaining to a rebuttal to an objection to an exclusion request and any supporting documents to [www.regulations.gov](http://www.regulations.gov) under Docket Number BIS-2018-0006. This form and any attached supporting documents will be made available to the public on [Regulations.gov](http://Regulations.gov).

For questions related directly to completing this form, please contact BIS via email ([Steel232@bis.doc.gov](mailto:Steel232@bis.doc.gov)) or telephone (202-482-5642).

Section	Surrebuttal Against Rebuttal Filed on an Objection to an Exclusion Request	Case Information
1.a	Regulations.Gov Exclusion Request Identification #, e.g., <i>BIS-2018-0006-99999</i>	
1.b	Objection to Exclusion Request Identification #, e.g., <i>BIS-2018-0006-99999</i>	
1.c	Rebuttal Identification #, e.g., <i>BIS-2018-0006-99999</i>	
1.d	Does this surrebuttal address a substitute or an identical product?	
1.e	Are you submitting confidential business information with this form? (If yes, please email it to <a href="mailto:232rebuttals@doc.gov">232rebuttals@doc.gov</a> 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 <a href="http://Regulations.gov">Regulations.gov</a> )	
<i>The basis of your surrebuttal 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)	
<b>Bases for Surrebuttal of Rebuttal Filings</b>		<b>Cause for Surrebuttal to Rebuttal Submission</b>
<b>3</b>	<b>MANUFACTURING TIME</b> <i>Challenging the requestor's assertion that:</i>	<i>Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters)</i>
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 <u>not</u> currently manufacture the identified steel 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 steel product.	
3.e	The objector can manufacture the steel product within the time frame stated in their objection filing.	
<b>4</b>	<b>QUALITY</b> <i>Challenging the requestor's assertion that their product is interchangeable with respect to its:</i>	<i>Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters)</i>
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)	
<b>5</b>	<b>AVAILABLE QUANTITY</b> <i>Challenging the requestor's assertion that:</i>	<i>Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters)</i>
5.a	Domestic steel product is available in sufficient quantity.	
5.b	The objector can supply the percentage of steel product stated in their objection filing.	
5.c	U.S. manufacturers have the capability to manufacture the identified steel product.	

5.d	The objector has sold or has attempted to sell the steel product described in the exclusion request.	
<b>6</b>	<b><i>DELIVERY TIME</i></b> <b><i>Challenging the requestor's assertion that:</i></b>	<b><i>Please provide a brief explanation of your challenge to the product manufacturing time (limit: 1,000 characters)</i></b>
6.a	Domestic steel product is available for timely delivery from the time the purchase order is received until the product is ready to ship.	
6.b	Domestic steel product is available for timely delivery from manufacturing plant to loading dock.	

<b>Instruction: This rebuttal must be signed by an organization official specifically authorized to certify the document as being accurate and complete.</b>	
<b>CERTIFICATION</b>	
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	
Company Name:	
Name of Authorizing Official:	Title of Authorizing
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.