

July 26, 2018

The Honorable Michael Platt, Jr.
Assistant Secretary of Commerce,
Office of Legislative and Intergovernmental Affairs
U. S. Department of Commerce

Dear Mr. Platt:

Based on media coverage of yesterday's meeting between President Trump and EU Commission President Juncker we are very hopeful that there will soon be a remission of the Section 232 tariffs on steel and aluminum. However, until that occurs we must proceed under the existing facts. To that end, and following up on our June 22, 2018 meeting, I am forwarding to you several questions that have arisen as suppliers of aluminum printing plates have prosecuted their exclusion request with DOC. They are the following:

1. Is there an appeal process if an exclusion request is denied?
2. How much explanation will be provided by the DOC for a denied or approved exclusion request?
3. Since this is an annual reprocess, will companies have to replicate the process and file individual exclusion requests each year, or will there be a separate "extension" process? [You alluded to this during our June 22 meeting, but we wanted to be clear on the matter]
4. How will customs handle the importation of materials if a company is only granted partial exclusion of their materials, and will there be reporting requirements?
 - a. If a company is granted an exclusion, we believe the exclusion number to be filed with customs at the time of importation will be 'ALU' followed by the last 6 digits of the specific docket number for each exclusion request. This allows us to file our import declaration at the material number since each material has its own docket number. However, that is direction for our electronic filing with Customs. With that stated, are there import documentation requirements that will need to be in place for this as well?
 - b. Note from Customs is shown below:



Importers and filers importing products granted an exclusion should submit the product exclusion number based on the last six digits of the product exclusion docket number at Regulations.gov. The product exclusion number should be submitted in the Importer Additional Declaration Field (54 record) of the entry summary data, based on the following format:

*For excluded steel mill articles -STLXXXXXX
For excluded aluminum articles= ALUXXXXXX*

Thank you for your attention to these important technical questions from our APTEch members; we look forward to your reply. Please let us know if you need further information.

Respectfully,



Mark J. Nuzzaco
Vice President, Government Affairs
Association for Print Technologies

Cc: Mark H. Crawford, Bureau of Industry and Security, U. S. DOC
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