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Kevin M. Dempsey
President and CEO

August 27, 2026

The Honorable Howard Lutnick
Secretary
United States Department of Commerce
1401 Constitution Ave, NW
Washington, DC 20230

**RE: Request for Public Comments on the Proposed Implementation of Duties
on Additional Aluminum, Steel, and Copper Derivative Articles Under
Section 232 [Docket No. BIS-2026-0331/ XRIN 0694-XC166]**

Dear Secretary Lutnick:

In response to a request from the Bureau of Industry and Security, Office of Strategic Industries and Economic Security, U.S. Department of Commerce,¹ the American Iron and Steel Institute (AISI) hereby submits comments on the proposal to include additional derivative articles with the scope of Section 232 duties.

AISI serves as the voice of the American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. Given AISI's focus, these comments are on the imposition of additional Section 232 tariffs – whether at the 25 percent or 50 percent rate – solely on derivative items made from steel.

AISI's membership is comprised of integrated and electric arc furnace (EAF) steelmakers, steel pipe and tube manufacturers and steel processors and fabricators, reflecting the production and distribution of both carbon, stainless, and electrical steels. These steels are essential to America's national and economic security, including roads and bridges, buildings, the electrical grid, cars and trucks and all clean energy technologies. AISI also represents associate members who are suppliers to or customers of the steel industry.

¹ *Request for Comments on the Scope and Operation of a Mechanism to Promote Reciprocal Managed Trade with China*; BUREAU OF INDUSTRY AND SECURITY, OFFICE OF STRATEGIC INDUSTRIES AND ECONOMIC SECURITY, U.S. DEPARTMENT OF COMMERCE (Aug. 4, 2026) [Docket No. 260803-0182]; *available at*: <https://www.federalregister.gov/documents/2026/08/06/2026-15961/request-for-public-comments-on-the-proposed-implementation-of-duties-on-additional-aluminum-steel>

America's steel industry remains the backbone of our national security, critical infrastructure and economic strength. Section 232 tariffs help ensure that domestic steel producers can continue to meet America's needs — not only now, but in years to come. A healthy domestic steel industry is vital to our national defense. Section 232 recognizes that steel is essential for military equipment, critical infrastructure and emergency response needs. Keeping these tariffs in place helps ensure that America is not reliant on imports in times of national security threats and crises. The American steel industry supports good paying, family-sustaining jobs across the country. By leveling the playing field for steel, as the steel tariffs help to do, hardworking American steelworkers can have the opportunity to contribute to and sustain local communities and grow manufacturing in the United States.

Implemented originally in 2018, the Section 232 steel tariffs have worked to stabilize the domestic steel industry and protect national security. Since 2018, finished steel import market share in the United States has fallen from roughly 23 percent to 18 percent, down more than 20 percent - and so far in 2026, import market share has now fallen to 16 percent – the lowest it has been since 2003. Furthermore, Section 232 tariffs supported a 3 percent increase in domestic shipments in 2025 versus the prior three-year average, with projections pointing to an additional 2 percent gain in 2026. In 2025, the United States was the third-largest producer of steel in the world, edging out Japan for the first time in nearly 30 years. The American steel industry has announced and/or completed nearly \$40 billion in investments since the steel tariffs were first imposed in 2018 and the industry has seen a 1.6 percent increase in employment since 2018 according to BLS data.

The Section 232 steel tariffs are clearly working, but their effectiveness continues to be undermined by circumvention and transshipment, often through downstream steel products. This circumvention threatens domestic steel production essential for “producing U.S. weapons that are vital for protecting U.S. national security.”² Foreign actors constantly seek access to our market while trying to evade our tariff regime. Extending coverage of the Section 232 steel tariffs to even more steel intensive derivative products, as proposed in this rule, will close the gap foreign producers are using to blatantly circumvent the tariffs. For example, empty steel containers shipped into the United States are currently subject to a 50 percent tariff. However, those same containers are not subject to a tariff if they are imported filled. By imposing the same 50 percent tariff on the value of the steel in the filled steel containers, the Department of Commerce is ensuring that the tariffs serve their intended purpose of strengthening the American steel supply chain.

We commend the Commerce Department and the Trump administration for its consistent leadership in protecting and promoting American manufacturing, particularly in the domestic steel sector. AISI and its members urge Commerce to

² *Id.*

The Honorable Howard Lutnick

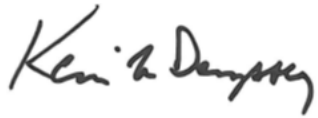
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advance a final derivative rule that addresses efforts to circumvent and weaken our Section 232 steel tariffs.

Thank you for the opportunity to provide these comments. AISI and our member companies look forward to continuing to work together to advance the interests of our industry.

Sincerely,

A handwritten signature in black ink that reads "Kevin M. Dempsey". The signature is written in a cursive, flowing style.

Kevin M. Dempsey
President and Chief Executive Officer