



March 3, 2022

Mr. Keith Weiss  
Chief Financial Officer  
Magellan Corporation  
1650 Lake Cook Road  
Deerfield, IL 60015

Dear Mr. Weiss:

Thank you for your comments submitted to the Federal Register Notices referenced as OMB Control Numbers 0694-0138, 0694-0139, and 0694-0141 regarding the procedures for submitting Exclusion Requests, Objections, Rebuttals, and Surrebuttals to the Section 232 Exclusion Process. The Department of Commerce is pleased to engage with constructive feedback on how to further enhance the transparency, timeliness, and efficacy of the Section 232 Exclusion Process.

The Department of Commerce reviews all filed Exclusion Requests on a case-by-case basis based solely on the material provided in the Exclusion Request and any associated Objections, Rebuttals, and Surrebuttals. Commerce maintains that this treatment is proper to allow each case to be weighed on its individual merits and account for potential changes in domestic availability over time, such as the development of new infrastructure in the United States. Thus, Commerce does not solicit information on past Granted Exclusions or incorporate such information into its reviews undertaken as part of the Section 232 Exclusion Process.

Commerce notes that it has recently opened a Request for Comment on the Section 232 Exclusion Process in the Federal Register. Commerce welcomes feedback submitted by Magellan Corporation to this Request for Comment as the appropriate venue to address substantive changes to the Section 232 Exclusion Process, including changes to the review criteria used by Commerce. The Request for Comment closes on March 28, 2022, and is available at the following link: <https://www.federalregister.gov/documents/2022/02/10/2022-02870/request-for-public-comments-on-the-section-232-exclusions-process>.

Finally, Commerce notes that Magellan files most of its Exclusion Requests for imports from the European Union or United Kingdom. Commerce is hopeful that the recently announced Section 232 Tariff-Rate Quota with the European Union, as well as a positive resolution of ongoing negotiations over Section 232 with the United Kingdom, may help alleviate Magellan's challenges with imports of Special Bar Quality (SBQ) Steel.

Thank you again for your public comment on this matter.

Sincerely,  
BIS Section 232 Steel & Aluminum Team