



**Leo W. Gerard**  
International President

September 10, 2014

The Honorable Penny Pritzker  
Secretary of Commerce  
U.S. Department of Commerce  
1401 Constitution Avenue, NW  
Washington, D.C. 20230

Dear Secretary Pritzker:

I am writing to urge that additional resources be requested for trade enforcement activities by the Department of Commerce and that such requests also be reflected in President Obama's next budget submission. It is clear that current resource constraints are taxing the execution of our laws and adversely affecting the ability of the Department's staff to address foreign dumping, subsidies and other unfair trade practices.

As you know, the United Steelworkers union (USW) is the largest industrial union in North America. A substantial portion of the products our members make are in tradable sectors. They have had to confront the increasing challenge posed by international competition, and regrettably, much of it is often unfair competition. Indeed, the Steelworkers have been involved in dozens of trade cases seeking to restore fair trade conditions to the market. Unfortunately, to win a case, we must prove injury; and for our members, that means reduced pay, declining benefits or lost jobs. Even when injury is proven, the level of margins for dumping and subsidies is critical to the effectiveness of the relief. Cases such as the recent rebar decision where margins against Turkey, the major source of rebar imports, were found to be zero or minimal. Such decisions do not effectively dissuade foreign countries from increased evasion of U.S. trade laws and further injury to American workers and their industries.

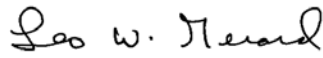
Trade cases are complex undertakings that require enormous investments of time and money. The review of these cases, we understand, increasingly taxes the Department's staff and resources. Our union would prefer not to bring trade cases or be party to company-initiated trade cases as it would presumably indicate that fair trade conditions exist. However when USW does bring a case, there needs to be adequate staff availability in the Department to review the facts and determine the appropriate level of relief. As pressure on resources increases, the ability of the Department's staff to address complex dumping and subsidy issues comes under pressure. Complex fact situations or dilatory tactics may undermine the quality of the reviews that are done.

Additional pressures from court-imposed remands greatly infringes on the Department's effectiveness.

Enforcement of our trade laws is at risk due to constrained resources, and the Department of Commerce's fiscal constraints jeopardize domestic production and employment. Further, the Department should carefully consider the allocation of staff within the Department, especially in regard to those units who work on policy and those who work within operations. Ultimately the public's confidence in our nation's international trade policies is undermined if the United States cannot properly enforce the agreements we have already made.

As the Department prepares for the next cycle of budget activities, I urge you to request additional funds and also evaluate the current internal assignment of resources for these essential programs. Our union stands ready to work with you on this vital task.

Sincerely,



Leo W. Gerard  
International President

LWG/cdk