

March 7, 2018

The Honorable Donald J. Trump President of the United States The White House 1600 Pennsylvania Avenue, NW Washington, DC 20500

Dear President Trump,

We are writing to share our concerns with your announced intention to levy 25 percent tariffs on imported steel. We strongly urge you to consider the unintended and substantial negative consequences that trade restrictions on steel imports will have for downstream U.S. manufacturers.

The U.S. tire manufacturing industry keeps America's economy on the move. Our companies operate 56 tire-related manufacturing facilities in 18 states and generate over \$27 billion in annual sales. We are responsible for more than a quarter million U.S. jobs – totaling almost \$20 billion in wages. In 2017, our companies accounted for 82 percent of the 316 million passenger, light truck and truck tire shipments in the U.S.

The U.S. tire manufacturing industry has enjoyed years of sustained growth, expanding our footprint across the United States. We believe this trend is likely to continue with more and more global tire manufacturers viewing the United States as an attractive location for tire manufacturing operations. Your announcement on March 1, 2018 of significant broad tariffs on imported steel could derail this renaissance in domestic manufacturing.

Imported high-quality steel is critical for tire production. U.S. tire manufacturers depend on grades of steel which are unavailable domestically to produce tires. Electric arc furnace technology, used in domestic steel mills, is unable to produce consistently the quality of tire cord-quality wire rod necessary to make tire cord for use in tire manufacturing. Tire cord-quality steel wire rod is produced using basic oxygen furnace technology, which generally is employed only by foreign wire rod suppliers.

The Department of Commerce Section 232 report recommends instituting a process that would allow Secretary Ross to exclude specific products if the U.S. lacks sufficient domestic capacity. Should you determine to levy 25 percent tariffs on imported steel, we urge the Administration to exempt the tire industry from any such tariffs.

Any action that curtails the availability of the supply of tire cord or tire cord-quality steel wire could potentially have a cascading negative impact on U.S. commerce, since the transportation industry and the military depend on a reliable supply of tires to ship goods throughout the country. Further, a disruption in tire manufacturing in the U.S. would threaten national security, since the U.S. military relies on the tire industry to provide high performing and durable tires to aid in our national defense.

We are deeply concerned with how the industry's inability to source the steel required for tire production will affect the future of tire manufacturing in the U.S. We appreciate your thoughtful consideration of this critical matter.

Sincerely,

Gordon Knapp Bridgestone Americas, Inc.

Steve Zamansky Cooper Tire & Rubber Company

Harry Choi Kumho Tire U.S.A. Inc.

naureen S. Kline

Maureen Kline Pirelli Tire North America

James Hawk Toyo Tires Holdings of Americas Inc.

Jochen Etzel Continental Tire the Americas, LLC

eve McChillan

Steven McClellan The Goodyear Tire & Rubber Company

Scott Clark Michelin North America, Inc.

Richard Smallwood Sumitomo Rubber Industries

ARNI GIF

Jeff Barna Vokohama Tire Corporation