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21st Century Steelmakers

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TA-201-75

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BY HAND DELIVERY

Ms. Lisa R. Barton
Secretary to the Commission
U.S. International Trade Commission
500 E Street, S.W.,
Washington, D.C. 20436

Re: *Crystalline Silicon Photovoltaic Cells (Whether or Not Partially or Fully Assembled Into Other Products)*

Dear Secretary Barton:

On behalf of the Steel Manufacturers Association (“SMA”), we write in support of the Global Safeguards (Section 201) petition filed by Suniva, Inc. and SolarWorld Americas, Inc. against imports of crystalline silicon photovoltaic cells (whether or not assembled into other products). We strongly urge the Commission to reach an affirmative determination in this investigation and to recommend fair relief from the devastating effects that imports are having on American solar manufacturers and workers.

SMA represents 30 North American steel producers. Its members collectively account for approximately 75 percent of all steel production in North America and employ more than 60,000 workers in the United States, Canada, and Mexico. SMA was instrumental in petitioning the U.S. government for Section 201 relief in 2001 to save the U.S. steel industry, and knows firsthand the devastating effects that global overcapacity can have on domestic manufacturers.

We are deeply troubled by the recent surge of imports of solar cells and panels into the United States and the devastating impact these imports have had on the U.S. solar manufacturing industry. This scenario is all too familiar to us, and is reminiscent of the injury that the steel industry faced more than a decade ago. Like with the steel industry, it is abundantly clear that global overcapacity is the driving

force behind the surge of solar imports. These imports have caused numerous bankruptcies and production shut downs, and thousands of American workers have lost their jobs or seen their wages slashed. All this has happened at a time when demand for solar products was high and growing. There is simply no reason why U.S. manufacturers—among the best and most innovative in the world—should not be thriving as well.

Like the steel industry, the U.S. solar industry has fought to maintain a level playing field by filing not one but two unfair trade cases. Although these trade cases provided the industry with some relief, they were no match for the massive support that foreign producers, particularly those in China, receive from their governments. And the evolving nature of global supply chains allow these companies to quickly and easily relocate production to evade antidumping and countervailing duty orders. Undeterred by the orders, foreign producers simply moved their production to other countries and continued to ship massive volumes to the United States.

Relief from these imports is imperative. For the steel industry, the temporary Section 201 relief provided critical stability at a time of crisis. The U.S. solar industry desperately needs similar breathing room. As the backbone of the solar industry in America, domestic cell and module production must not be lost to foreign imports. These core competencies must be allowed to grow and thrive. Strengthening U.S. solar manufacturing will serve to strengthen demand for solar energy overall—as domestic manufacturers grow, healthy and fair competition and technological advancements will see overall costs decline and demand for solar products increase. This will also have a positive impact on the U.S. steel industry, which provides hundreds of thousands of tons of American steel for the manufacture of steel racking systems for solar farms.

The U.S. solar manufacturing industry is in crisis and is struggling for survival. This is a story that the Commission has seen before—global imports destroying American industry—and one that will surely repeat itself absent relief. The steel industry fought back in 2001 and was awarded temporary relief that gave the industry the chance to recover. The American solar industry deserves a similar chance.

Respectfully submitted,

A handwritten signature in dark ink, reading "Philip K. Bell". The signature is fluid and cursive, with the first name "Philip" being the most prominent.

Philip K. Bell

President

Steel Manufacturers Association