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VIA ONLINE SUBMISSION

June 12, 2017

The Honorable Robert Lighthizer
U.S. Trade Representative
Office of the U.S. Trade Representative
600 17th Street NW
Washington, DC 20508

**Re: Comments of Metals Service Center Institute ("MSCI")
Concerning NAFTA Negotiations DOC 2017-10603**

Dear Ambassador Lighthizer,

The Metals Service Center Institute ("MSCI") respectfully submits the following comments concerning renegotiation of the North American Free Trade Agreement ("NAFTA" or "the Agreement").

I. Who We Are

MSCI is a U.S. trade association representing more than 300 member companies which operate in more than 1,200 business locations across North America. Our membership is very diverse, consisting of primary metals producers, metals service centers, and others with a vested interest in the industrial metals supply chain. The industry, including primary producers and metals service centers, employs more than 400,000 people paying more than $30 billion in wages and generating more than $180 billion of economic impact to the United States economy. Metals service centers supply the metal requirements of an estimated 300,000 downstream manufacturers and fabricators. Collectively, service centers are the largest domestic customers of U.S. mills, purchasing an estimated 30 percent of all carbon steel, an estimated 50 percent of all specialty steels and an estimated 2.1 billion pounds of aluminum produced and distributed in this country. Service centers cut, fold, shape, polish and further process metals purchased from producers and then sell processed metal directly to manufacturers, fabricators, machine shops and others in the metals supply chain.

Given the position of service centers within the industrial metals supply chain, MSCI believes its interests are reflective of the interests of the larger North American metals industry. Metals service centers, as the "middlemen" in that chain, are an important barometer of the health of the entire industry. Service centers purchase both domestically and foreign produced metals for processing and ultimately downstream shipment to the manufacturing base.

Service centers will suffer economic harm if the domestic mills collapse due to unfair trade practices and other abuses. Service centers *and* the downstream U.S. manufacturing base require a strong and viable North American production base. Like the country as a whole, the service center industry requires thoughtful trade policy initiatives that avoid the binary or sterile choices of the past.

II. U.S. Trade Representative Request for Public Comments on Negotiating Objectives Regarding the Modernization Of North American Free Trade Agreement with Canada and Mexico

MSCI appreciates the opportunity to provide input regarding the Administration's negotiations with Canada and Mexico. MSCI supports the Administration's goals in the negotiation, as outlined in your May 18th letter[1] to Congress, to support higher paying jobs in the U.S. and to grow the U.S. economy by improving U.S. opportunities under NAFTA**.**

As stated in Article 102 of the NAFTA:

> *The objectives of this Agreement, as elaborated more specifically through its principles and rules, including national treatment, most-favored-nation treatment and transparency, are to:*
>
> *(a) eliminate barriers to trade in, and facilitate the cross-border movement of, goods and services between the territories of the Parties;*
>
> *(b) promote conditions of fair competition in the free trade area;*

[1] Robert E. Lighthizer, *NAFTA Notification*, (May 18, 2017), https://ustr.gov/sites/default/files/files/Press/Releases/NAFTA%20Notification.pdf.

> *(c) increase substantially investment opportunities in the territories of the Parties;*
>
> *(d) provide adequate and effective protection and enforcement of intellectual property rights in each Party's territory;*
>
> *(e) create effective procedures for the implementation and application of this Agreement, for its joint administration and for the resolution of disputes; and*
>
> *(f) establish a framework for further trilateral, regional and multilateral cooperation to expand and enhance the benefits of this Agreement.*

NAFTA has contributed mightily to the economies of the U.S., Canada and Mexico and certainly to the U.S. industrial metals supply chain. MSCI represents industrial metals supply chain members and their interests in all three countries. We look forward to collaborating with our colleagues throughout North America and with President Trump's key trade advisers who are working to modernize the Agreement that is so critical to our industries and the U.S. economy.

In the case of North American trade, U.S., Canadian and Mexican manufacturers are, in fact, well-integrated, with about 54 percent of U.S. trade with Canada and Mexico occurring between related parties.[2] Moreover, about 48 percent of U.S. manufactured goods imports from Canada and 40 percent of U.S. manufactured goods imports from Mexico were categorized as intermediate goods, parts and components in 2015.[3] Trade in these intermediate goods has helped manufacturers in the United States improve their global competitiveness and grow domestic manufacturing with end products sold both in the United States and overseas. In the transportation sector (including automobiles, automobile parts, and aircraft equipment and parts), 72 percent of U.S. trade with Canada and Mexico is between related parties, demonstrating the degree to which the industry's NAFTA supply chain is integrated.[4] For the electric equipment,

[2] NAM analysis of data reported by the U.S. Department of Commerce, accessed at https://www.census.gov/programs-surveys/trade/data/tables/relatedparty.html.

[3] Data accessed in OECD.Stat Database, Bilateral Trade in Goods by Industry and End-Use, accessed at http://www.oecd.org/trade/bilateraltradeingoodsbyindustryandend-usecategory.htm.

[4] NAM analysis of data reported by the U.S. Department of Commerce, accessed at https://www.census.gov/programs-surveys/trade/data/tables/relatedparty.html.

appliance and components sector, the share is 64 percent, and for the computer and electronic products sector, the share is 63 percent.[5]

A. Guiding Principles to Modernize NAFTA

As the Trump Administration considers areas of NAFTA that can be renegotiated and improved, MSCI respectfully submits the following principles to guide the USTR's efforts:

1. Recognize the successful, integrated and interdependent manufacturing trade flows that exist across the North American industrial metals supply chain in order to avoid disrupting well-established relationships and economic partnerships that expand U.S. exports, enhance economic growth and provide well-paying manufacturing jobs to more than two million American manufacturing workers.

2. Modernize and improve NAFTA to:
    a. Recognize that the successes and failures of NAFTA are specific to particular industries rather than systematic across all industries;

    b. Ensure stronger and more transparent rules that continue to level the North American playing field;

    c. Harness the digital revolution to allow for faster, easier, less burdensome and safer cross-border commerce;

    d. Create even stronger, more efficient dispute settlement procedures;

    e. Renew the commitment to work collaboratively, while strengthening the rules and mechanisms to hold accountable bad actors that seek to circumvent trade laws.

III. NAFTA, The Industrial Metals Supply Chain and Integrated Trade Flows

MSCI is a strong proponent of free and fair trade. But foreign government policies that distort markets — such as subsidies that promote new excess capacity or delay the closure of unneeded existing capacity and currency manipulation — undermine free and fair trade by circumventing the basic rules of the marketplace. The U.S. government has attempted to ensure free and fair trade through its membership and participation in the World Trade Organization and by entering into various multilateral, bilateral, and regional trade agreements to establish the rules of international commerce. MSCI has generally and strongly supported these agreements.

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[5] *Id.*

However, the effectiveness of trade agreements in promoting free and fair trade depends on vigorous monitoring of each party's compliance and prompt and vigorous enforcement against violators.

While we strongly agree with the Administration's position that NAFTA can be modernized and improved, we also recognize that the Agreement has largely been successful. It has helped level the playing field and has created well-established, fully-integrated, market-driven trading mechanisms that allow for free and fair trade between the U.S., Canada and Mexico.

The United States Trade Representative and the Trump Administration should take care not to upset the metal trade relationship between these countries.

A. Integrated Trade Flows Spur Innovation, Reduce Consumer Costs

As noted above, metals service centers supply the metal requirements of an estimated 300,000 downstream manufacturers and fabricators. As the middleman in the industrial metals supply chain, service centers supply metal into first stage component and parts manufacturing and thus rely on a healthy manufacturing environment. NAFTA has provided the incentive to integrate the North American industrial metals supply chain spurring innovative, value-added manufacturing that has resulted in reduced consumer costs and U.S. jobs.

As seen in Figure 1, manufacturing trade with Canada and Mexico has tripled since NAFTA came into effect in 1994.[6] It also has reduced consumer prices in the United States.[7]

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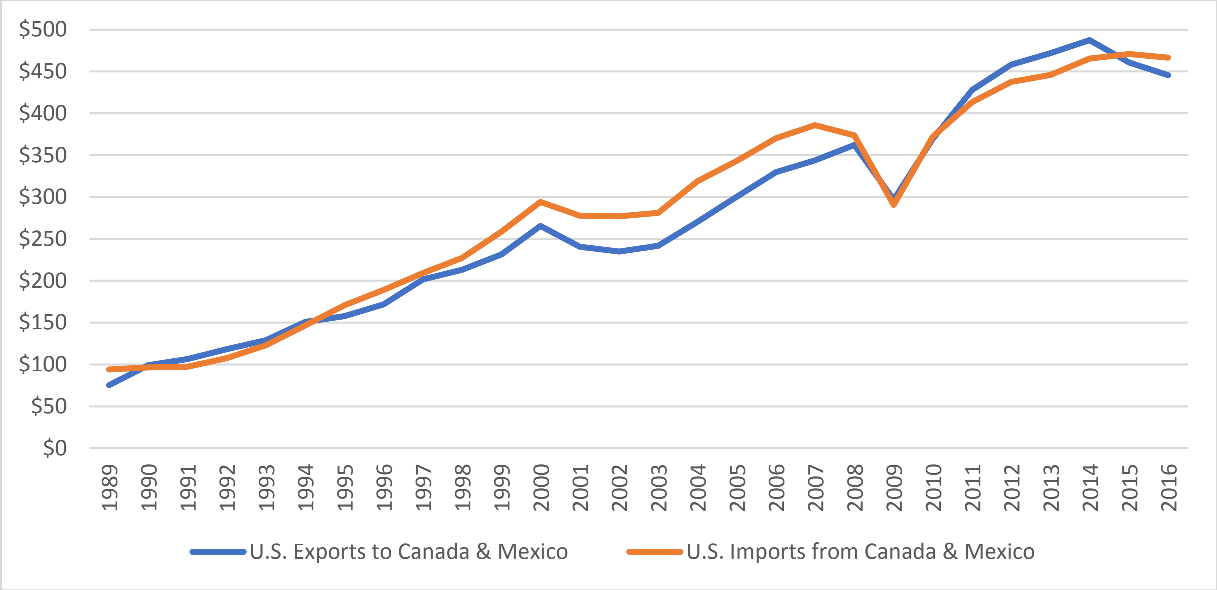
[6] NAM, *Manufacturing Makes America Strong* 12 (2016), http://documents.nam.org/IEA/NAFTA%20Discussion%202016.pptx.

[7] Kimberly Amadeo, *Facts About NAFTA: Statistics and Accomplishments*, *The Balance*, May 8, 2017, https://www.thebalance.com/facts-about-nafta-statistics-and-accomplishments-3306280.

Figure 1. U.S. Manufacturing Trade with Canada and Mexico
(in Billions of U.S. Dollars)



Source: *U.S. Commerce Department*

Most notably it has re-created the North American automobile industry, which is heavy with metal content, into a modern, multi-billion dollar, tri-partite, cross border cooperative dependent on the movements of parts and semi-finished vehicles across all our borders. A typical auto part, for example, crosses the U.S.-Canadian border seven times before it becomes part of a finished vehicle.[8] NAFTA has also nurtured a broad and vigorous advanced manufacturing supply chain across North America, from companies like Bombardier and Volkswagen to 3-D Robotics.[9]

[8] Kristine Owram, *Challenge 2017: NAFTA breakup would cost the auto industry billions, but Linamar CEO believes cooler heads will prevail*, *Financial Post*, Dec. 29, 2016, http://business.financialpost.com/news/transportation/challenge-2017-nafta-breakup-would-cost-the-auto-industry-billions-but-linamar-ceo-believes-cooler-heads-will-prevail.

[9] *Id.*; Joseph Perdilla and Alan Berube, *How to Strengthen NAFTA's Next 20 Years*, Brookings Institution, Feb. 12, 2014, https://www.brookings.edu/blog/the-avenue/2014/02/12/how-to-strengthen-naftas-next-20-years/.

B. A Strong Manufacturing Partnership

The Peterson Institute for International Economics estimates that the United States is $127 billion richer each year than we would be without NAFTA.[10] The U.S. Chamber of Commerce estimates that 14 million U.S. jobs are now dependent on the free trade agreement.[11]

Our annual trade with Canada now totals nearly $630 billion and our annual trade with Mexico now totals nearly $580 billion according to the most recent USTR estimates.[12] Together, Canada and Mexico purchase more manufactured goods from the United States than the next ten foreign countries combined.

Both countries are essential, integrated players in the North American industrial metals supply chains for energy production and supplies, commercial construction and infrastructure projects, and motor vehicles, among other products.

In the metals service industry, the overall trading relationship with Mexico is robust. Mexico is the United States' third largest overall goods trading partner and its second largest destination for manufactured goods exports. According to the American Iron and Steel Institute, our trading relationship with Mexico is "balanced, particularly given the high degree of input trade crossing the border and the high value-added of manufactured goods imports from Mexico."[13]

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[10] *NAFTA 20 Years Later*, Peterson Institute for International Economics, November 2014, https://piie.com/publications/briefings/piieb14-3.pdf.

[11] *NAFTA Triumphant: Assessing Two Decades of Gains in Trade, Growth and Jobs*, U.S. Chamber of Commerce, (Oct. 27, 2015), https://www.uschamber.com/report/nafta-triumphant-assessing-two-decades-gains-trade-growth-and-jobs.

[12] *Canada*, U.S. Trade Representative https://ustr.gov/countries-regions/americas/canada;*Mexico*, U.S. Trade Representative https://ustr.gov/countries-regions/americas/mexico.

[13] American Iron and Steel Institute, *AISI Comments Regarding Causes of Significant Trade Deficits for 2016, DOC-2017-0003*, 21 (May 10, 2017), http://www.steel.org/~/media/Files/AISI/Public%20Policy/Letters/AISI-Comments-on-Significant-Trade-Deficits.pdf?la=en. ("AISI Comments").

The auto market is a good example. Mexico has overtaken Canada as our leading auto manufacturing partner[14] and by 2020 will produce an estimated 25% of all North American cars.[15] While it is true that the United States ran a $63 billion goods trade deficit with Mexico in 2016, as AISI has noted, this "is due to trade in transportation equipment and machinery, two steel-intensive goods categories."[16] As AISI explains, "American steel is a major input into Mexican automotive and machinery production. Thus, Mexican manufactured goods exports to the United States contain significant U.S. steel content, due to the integrated nature of North American steel and manufactured goods supply chains."[17] Indeed, every dollar in goods exported from Mexico to the U.S. includes 40 cents of U.S. content.[18]

And the U.S.-Canada metal services trade relationship is also strong and balanced. Canada is the United States' top export market for manufactured goods generally, and also the top export market for U.S. steel products specifically.[19] Indeed, today the United States accounts for 60 percent of Canada's steel imports.[20]

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[14] Patti Domm, *Trump is mad about 'made in Mexico' cars — but this is bigger*, CNBC, Jan. 3, 2017, http://www.cnbc.com/2017/01/03/trump-is-mad-about-made-in-mexico-cars--but-this-is-bigger.html

[15] Chris McFayden, *Emergent Mexico and the Solid (U.S.) South*, Southern Automotive Alliance, (Oct. 2016).

[16] AISI Comments at 21.

[17] *Id*.

[18] Christopher Wilson, *Working Together: Economic Ties between the United States and Mexico*, The Wilson Center, (Dec. 13, 2011), https://www.wilsoncenter.org/publication/working-together-economic-ties-between-the-united-states-and-mexico#sthash.Su3aqTGV.dpuf.

[19] U.S. Trade Representative, https://ustr.gov/countries-regions/americas/canada; International Trade Administration, *Global Steel Trade Monitor, Steel Imports Report*, (Feb. 2017), http://trade.gov/steel/countries/pdfs/2016/q3/imports-Canada.pdf.

[20] International Trade Administration, *Global Steel Trade Monitor*, *Steel Imports Report*, (Feb. 2017), http://trade.gov/steel/countries/pdfs/2016/q3/imports-Canada.pdf.

As NAM explains,

> [i]n contrast to the overall deficit, the United States had a $34.2 billion manufacturing trade surplus with Canada in 2016, and has increased its exports by $88.9 billion since 2002. Indeed, the United States exports more manufactured goods exports to Canada than anywhere else, even though Canada's economy is one-eleventh the size of the United States' economy, and smaller than other markets such as China, India, and Japan that purchase far fewer U.S. exports. Notably, Canada imports more than half of all its manufactured goods imports from the United States. Barriers between the United States and Canada are among the lowest in the world as a result of the NAFTA. Tariffs on manufactured goods have been eliminated on both sides of the border and the United States has a high share of Canada's manufactured goods import market, with 51 percent of the market, more than any other foreign supplier.[21]

The United States also has a healthy aluminum trading relationship with NAFTA countries. According to the Aluminum Association,

> [s]ince 2011, U.S. aluminum exports to the rest of the world have declined almost 19 percent, while exports to Canada and Mexico have increased 9 percent. In the same time period, U.S. aluminum imports from our NAFTA trading partners have increased 13 percent, and represented more than 50 percent of all aluminum imports in 2016. More than 50 percent of all aluminum flowing into or out of the U.S. in 2016 either originated from or was destined for one of our NAFTA trading partners. Maintaining NAFTA's duty-free treatment of aluminum products is critical to the continued success of our North American industry.[22]

The robust trading partnership the United States shares with Canada and Mexico as a result of NAFTA is incredibly important to the American metal services industry. While MSCI applauds the Administration's goals of supporting higher paying American jobs and the growth of the U.S. economy, we urge the Administration to renegotiate NAFTA with the additional goal of avoiding disruptions to well-established relationships and economic partnerships that expand U.S. exports, enhance economic growth and provide well-paying manufacturing jobs to more than two million American manufacturing workers.

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[21] National Association of Manufacturers, *Comments on Administration Report on Significant Trade Deficits*, 14-5, 18-36 (May 10, 2017), http://documents.nam.org/IEA/2017-05-10%20NAM%20Submission%20on%20Trade%20Deficit%20Review.pdf. ("NAM Comments").

[22] *The Aluminum Association Position on The North America Free Trade Agreement*, http://www.aluminum.org/sites/default/files/Aluminum%20Assoc%20NAFTA%20Position.pdf.

IV. Recommendations for Modernizing and Improving NAFTA

A. Harness the Digital Revolution to Allow for Faster, Easier, Less Burdensome and Safer Cross-Border Commerce

Metals producers and metals service centers supply the steel, aluminum, stainless and other metals requirements of more than an estimated 300,000 downstream manufacturers and fabricators, many of whom produce goods that cross U.S., Canadian and Mexican borders. Many of these fabricators and manufacturers are small and medium-sized businesses (SMEs)[23], producing small metal components which are ultimately assembled into final consumer products. Through NAFTA the North American automobile industry, which is heavy with metal content, has developed into a modern, multi-billion dollar, tri-partite, cross border cooperative dependent on the movements of parts and semi-finished vehicles across all our borders. A typical auto part, for example, crosses the U.S.-Canadian border seven times before it is part of a finished vehicle.[24] NAFTA has nurtured a broad and vigorous advanced manufacturing supply chain producing intermediate parts across North America. These supply chains have contributed to the growth of the manufacturing sector in the U.S., creating higher paying and higher skilled jobs.

> The nature of this integrated supply chain requires a less complex and cost effective customs and border rules, compliance requirements and processing systems. The efficiency of the customs and border system relates directly to the efficiency of the supply chain. Investment in inventories and working capital, ability to meet just in time delivery requirements of the next stage fabricator and/or manufacturer is impacted by bottlenecks at the border such as confusing fees and paperwork, outdated and burdensome documentation requirements, redundant security programs, inadequate infrastructure, disjointed regulations, outdated rules of origin, etc. These bottlenecks and delays add huge costs and delays to the supply chain. Small and medium-sized fabricators and manufacturers are especially impacted by these border issues and often lack the resources or experience to effectively deal with customs, border systems and other

[23] In 2015 SMEs accounted for 98 percent of U.S. exporters and 97 percent of goods importers. Commerce Department, *U.S. Exporting and Importing Companies, 2015*, http://www.trade.gov/mas/ian/build/groups/public/@tg_ian/documents/webcontent/tg_ian_005538.pdf.

[24] Kristine Owram, *Challenge 2017: NAFTA breakup would cost the auto industry billions, but Linamar CEO believes cooler heads will prevail*, Financial Post, (Dec. 29,. 2016), http://business.financialpost.com/news/transportation/challenge-2017-nafta-breakup-would-cost-the-auto-industry-billions-but-linamar-ceo-believes-cooler-heads-will-prevail.

regulations.[25] These difficulties are particularly relevant when considering the best way to modernize and improve NAFTA because our NAFTA trading partners are the leading markets for U.S. SME good exports.[26] As the International Trade Commission reports, "Canada and Mexico combined accounted for 33 percent of U.S. merchandise exports by SMEs in 2007, with exports to those two countries valued at $70 billion ($45 billion exported to Canada, and $35 billion exported to Mexico."[27]

Addressing and enhancing efficiency at U.S., Canadian and Mexican borders will result in a more competitive industrial metals supply chain and increased global competitiveness for U.S. manufacturers which will result in economic growth and U.S. jobs.

B. Tighten and Expand Rules of Origin Standards to Prevent Parts from Other Countries Being Assembled and Shipped into the United States

NAFTA's rules of origin should be reviewed and increased to incentivize investment and job growth in industrial manufacturing in the U.S. The rules which set the threshold for the regional content required to qualify for NAFTA's tariff-free treatment also help protect against the impact of global overcapacity and unfair trade practices, specifically from China and other Asian countries. As Reuters notes "[t]he NAFTA rules are in place to prevent China or other lower wage countries from being able to produce the majority of content in a vehicle and export it to another country to assemble it without paying tariffs."[28] For example in the auto industry, a significant consumer of metals, 62.5 percent of a car or light truck must be produced within North America before it can enter one of the three NAFTA countries tariff free.[29] By strengthening these content requirements, U.S. manufacturers may be incentivized to increase

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[25] *Small and Medium Sized Enterprises: U.S. and EU Export Activities, and Barriers and Opportunities Experienced by U.S. Firms,* USITC Pub, 4169, 5-9 (July 2010), https://www.usitc.gov/publications/332/pub4169.pdf (internal citations omitted).

[26] *Id*. at 2-5 & 2-6.

[27] *Id*.

[28] Dave Graham, *Pressured by Trump, Mexico ready to discuss NAFTA rules in U.S. talks*, Reuters, January 24, 2017 http://www.reuters.com/article/us-usa-trade-nafta-mexico-idUSKBN1582UQ.

[29] *Automotive Products Rules of Origin*, CBP, https://www.cbp.gov/trade/nafta/guide-customs-procedures/provisions-specific-sectors/automotive-products.

and grow their investments in U.S. manufacturing facilities, research and development and job growth.

> Under NAFTA rule-of-origin clauses, 62.5 percent of the value of a vehicle must come from NAFTA for the finished vehicle to qualify for duty-free treatment, pushing North American automakers to source steel from the United States, Canada or Mexico. The use of U.S. steel products—duty-free under NAFTA—by growing Canadian and Mexican motor vehicle and appliance manufacturers has helped them meet the regional value content requirements, the report said, noting that 87 percent of all U.S. steel exports were shipped to Canada or Mexico in 2014.[30]

Utilization of modern technology, software and digitization practices should also be implemented across the U.S., Canada and Mexico to make rules of origin compliance and verification streamlined, efficient and less costly. Manufacturers of some goods in the U.S. choose not to comply with NAFTA rules of origin due to the complexity and high costs of applying for low- or tariff-free treatment.[31] Process efficiency and reduced compliance costs are critical barriers to entry and their reform would avoid incentivizing off shoring and U.S. job loss.

C. Create Even Stronger, More Efficient Dispute Settlement Procedures

Even the strongest of economic relationships need efficient, expeditious and transparent procedures to settle their differences. The dispute settlement procedures and process is an area of the NAFTA that can and should be revised to ensure fair, transparent, timely and mutually agreed settlement. For example, NAFTA's Chapter 19 provides the option of a binational panel review in place of domestic judicial review for domestic decisions regarding anti-dumping and countervailing duty matters.[32] This binational panel process was billed as faster and more efficient than either courts or the WTO.[33]Unfortunately, in part due to things such as a lack of

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[30] *Steel imports flourish under trade deals: ITC*, American Metal Market (Jun 30, 2016), http://www.amm.com/Article/3566632/Steel-imports-flourish-under-trade-deals-ITC.html. (internal quotations omitted).

[31] Oliver Cadot, et. al., *Assessing the Effect of NAFTA's Rules of Origin*, Mimeo (2002)(linking a 64% utilization rate of NAFTA preferences to the Rules of Origin).

[32] North American Free Trade Agreement, Dec. 17, 1992, Ch. 19.

[33] Kathleen W. Cannon, *Trade Litigation Before the WTO, NAFTA, and U.S. Courts: A Petitioner's Perspective*, 17 Tul. J. Int'l & Comp. L. 389, 414-416 (2009).

page limits on briefs and frequent delays in establishing the panel, this process is not as efficient as it could be and it now often takes several years for a dispute to be resolved.[34] Additionally, practitioners have noted "NAFTA procedures for filing of various documents and processing basic papers [in Chapter 19 actions] are often cumbersome."[35] Modernizing and streamlining the current dispute resolution procedures is a good way to ensure the U.S.'s trade relationship with our NAFTA partners remains a positive one in which all parties believe they are being treated fairly. The USTR should also consider implementing periodic procedural reviews to embed systemic opportunities to address new challenges and emerging issues.

D. Renew the Commitment to Work Collaboratively, While Strengthening The Rules And Mechanisms to Hold Accountable Bad Actors Who Seek to Circumvent Trade Laws

As noted previously, the North American metals industry is vibrant and prosperous and continues to grow among the three trading partners. However, it is well documented that other countries unfairly subsidize industrial metal through a variety of market-distorting practices, including circumvention and currency manipulation.[36] In an attempt to combat these unfair trade practices North American governments have rightfully imposed tariffs on various metals that they have determined have been unfairly subsided.[37] There is growing evidence, however, that in an attempt to circumvent those rightfully imposed duties, the Chinese and others are simply processing that same metal in parts for export.[38] These countries cannot be allowed to continue to

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[34] *Id*. *See also Decisions and Reports*, NAFTA Secretariat, https://www.nafta-sec-alena.org/Home/Dispute-Settlement/Decisions-and-Reports.

[35] P. Macrory, *NAFTA Chapter 19: A Successful Experiment in International Trade Dispute Resolution*, C.D. Howe Institute at 17, 22 (Sept. 2002).

[36] MSCI, *Comments of Metals Service Center Institute, ("MSCI") Concerning the Section 232 National Security Investigation of Imports of Steel, DOC 2017-08499* (May 31, 2017).

[37] Matt Sharp, *Mexico Sets Temporary Import Duties on Steel Products*, Law360 (Sept. 30, 2015), https://www.law360.com/articles/709097/mexico-sets-temporary-import-duties-on-steel-products; *Measures in Force*, Canada Border Services Agency, http://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev-eng.html; *AD/CV Orders*, ITC, https://www.usitc.gov/sites/default/files/trade_remedy/documents/orders.xls.

[38] *Major U.S. Steel Producers Accuse China of Circumventing Trade Orders, Says Kelley Drye & Warren LLP*, PRNewswire (Sept. 22, 2016), http://www.prnewswire.com/news-

circumvent our trade pacts. A modernized NAFTA should include a renewed commitment to work collaboratively to strengthen rules, mechanisms and monitoring systems to hold bad actors who seek to circumvent our trade laws accountable.

E. Provide Metric-Driven, Results-Oriented Manufacturing Job Training

A skilled manufacturing workforce is fundamental to a prosperous North American metals industry, yet we face serious education and training challenges that threaten our productivity and competitiveness.[39] To better prepare the North American manufacturing worker, MSCI encourages the Administration to explore creative, cooperative North American training opportunities, streamline federal job training programs and accurately assess industry and labor market trends to better prepare workers to meet employer and market demands. Similarly, greater support for vocational education, job training and certification programs that will teach workers the skills they will need to fill the jobs of the 21st century.

V. Conclusion

MSCI sincerely appreciates this opportunity to brief the USTR and Administration on the balance of interests in the metal services industry that operates under NAFTA.

Respectfully submitted,

M. Robert Weidner, III
President and CEO

Richard A. Robinson
Chairman

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releases/major-us-steel-producers-accuse-china-of-circumventing-trade-orders-says-kelley-drye--warren-llp-300332981.html.

[39] Carol Hymowitz, *Millions of Manufacturing Jobs Could Go Unfilled*, Bloomberg (March 16, 2017), https://www.bloomberg.com/news/articles/2017-03-16/millions-of-manufacturing-jobs-could-go-unfilled.