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**The Real Estate Roundtable**

June 27, 2019

The Honorable Wilbur L. Ross  
Secretary  
U.S. Department of Commerce  
1401 Constitution Ave., NW  
Washington, D.C. 20230

**Re: Pending Investigations on Fabricated Structural Steel from  
Canada, China, and Mexico**

Dear Secretary Ross:

The Commerce Department will soon issue its preliminary determinations in the countervailing duty and antidumping investigations into fabricated structural steel (FSS) from Canada, Mexico, and China. On behalf of The Real Estate Roundtable,<sup>1</sup> I respectfully request that Commerce resist calls from certain parties in the case to change the rules for how subsidies or dumping are calculated.

The pending FSS investigations could have a significant impact on jobs and growth in U.S. real estate. Canada and Mexico, in particular, play important roles in ensuring an adequate supply of FSS for ongoing real estate development projects, and they bring sophisticated design and engineering to the projects they bid on. A decision that leads to higher construction costs will have a negative effect on new development and construction activity in the United States. Of course, as we noted in our March 4, 2019 letter to the USITC, if there are facts proving unlawful or inappropriate dumping or subsidies of FSS that are causing injury to U.S. businesses, then action to counter those unfair trade measures is warranted.

As these investigations proceed, it is critical that they are conducted in a fair and balanced manner with due allowance for the complexities of FSS markets. As a general matter, FSS is not supplied or sold separately but is a part of a bundle of products and services that go into the construction of a steel superstructure for a new building. FSS is designed and finished for a particular building. The bid itself includes the cost of the related goods and services provided by the steel fabricator. Those goods and services include engineering design, transportation, and erection of the structure, as well as other products and intangibles necessary for the project.

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<sup>1</sup> The Real Estate Roundtable brings together leaders of the nation's top publicly-held and privately-owned real estate ownership, development, lending and management firms with the leaders of major national real estate trade associations to jointly address key national policy issues relating to real estate and the overall economy. Collectively, Roundtable members' portfolios contain over 12 billion square feet of office, retail and industrial properties valued at over \$3 trillion; over 2 million apartment units; and, in excess of 3 million hotel rooms.

The Honorable Wilbur L. Ross

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For these reasons, we request that the Department reject calls from certain parties to change the rules for calculating subsidies or dumping, such as revising sales values for completed, erected projects.

We appreciate the opportunity to express our views and concerns as this investigation progresses, and would be pleased to meet with you or other officials at the Department to respond to any questions or provide additional information.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeffrey D. DeBoer". The signature is fluid and cursive, with a large initial "J" and "D".

Jeffrey D. DeBoer

President and Chief Executive Officer