

SABIC



Danielle Cannata  
International Trade Counsel

Ray Cantrell  
International Trade Analyst  
Chemicals Division  
U.S. International Trade Commission  
500 E St., SW, Room 513-I  
Washington, DC 20436

April 24, 2012

Dear Mr. Cantrell,

I am writing in reference to H.R. 1503 (To Suspend Temporarily the Duty on Certain Hydrogenated Polymers of Norbornene Derivatives). SABIC's Innovative Plastics business asks that cyclo olefin polymers (COP) imported under the brand name Zeonex/Zeonor by a company called Zeon Chemicals *not* be included in this year's Miscellaneous Tariff Bill. SABIC's Innovative Plastics business manufactures a competing product called LEXAN\* resin here in the United States. LEXAN resin is used in several key application areas such as food and medical packaging, business machine housings, light management and optical media.

Both LEXAN resin and Zeon's COP have similar properties which make them candidates for many of the same types of applications. Overlapping applications may include: optical film, medical applications, silicon wafer transport and storage devices, LED applications, optical component and lens applications, light guides and diffusers for LCD screens, and injection or blow mold applications. When selecting a resin for a particular application, customers consider how well a resin's properties fulfill the application requirements together with the price of the resin

SABIC's Innovative Plastics business manufactures LEXAN resin in Indiana and Alabama. Our facility in Mt. Vernon, Indiana is the largest employer in its county with approximately 1150 employees. Its wages are some of the most competitive in its region with an annual payroll plus benefits of \$125.7 million. Our facility in Burkville, Alabama employs approximately 350 people. Its wages are again some of the most competitive in that region with an annual payroll plus benefits of \$33 million.

\*LEXAN is a trademark of SABIC Innovative Plastics IP B.V.

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Accordingly, since there is domestic manufacture of a competing product, SABIC requests that the Zeon COP be excluded from the MTB. At a time when petrochemical feedstock costs have risen dramatically, SABIC's Innovative Plastics business cannot afford to have margins further reduced by lower-cost imports. The elimination of the tariff on imports of these competitor products would indeed be detrimental to SABIC's Innovative Plastics business and to the jobs that it provides in Indiana and Alabama.

Sincerely,

A handwritten signature in black ink that reads "Danielle Cannata".

Danielle Cannata  
International Trade Counsel