

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

June 6, 2012

Dear Mr. Cantrell,

I am writing in reference to H.R. 4380 (To Suspend Temporarily the Duty on Capacitor Grade Homopolymer Propylene Resin in Primary Form). SABIC's Innovative Plastics business asks that Capacitor Grade Homopolymer Propylene Resin by a company called MIRWEC Film *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 MIRWEC's product have similar properties which make them candidates for many of the same types of applications. The characteristics inherent to the polymer in both LEXAN and Low Ash Capacitor Grade Polypropylene Resin are the same. Low ash polypropylene resin is not restricted to use as a capacitor film and can be used in many other types of systems. This puts it into direct competition with our products for use in LED applications, in automotive systems, electronic systems, and transportation systems 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.

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

Accordingly, since there is domestic manufacture of a competing product, SABIC requests that the MIRWEC Film product 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