KELLEY DRYE & WARREN LLP
A LIMITED LIABILITY PARTNERSHIP

WASHINGTON HARBOUR, SUITE 400
3050 K STREET, NW
WASHINGTON, D.C. 20007-5108

(202) 342-8400

NEW YORK, NY
CHICAGO, IL
STAMFORD, CT
PARSIPPANY, NJ

BRUSSELS, BELGIUM

AFFILIATE OFFICES
MUMBAI, INDIA

FACSIMILE
(202) 342-8451
www.kelleydrye.com

September 7, 2012

USITC Investigation Nos. 701-TA-350 and 731-TA-616 and 618 (Third Review)
BPI Information Contained in Enclosures
DOCUMENT MAY BE RELEASED UNDER APO

DELIVERY BY HAND

Mr. David Boyland
Office of Investigations
U.S. International Trade Commission
Room 112
500 E Street, S.W.
Washington, DC 20436

Re: Corrosion Resistant Carbon Steel Flat Products from Germany and Korea

Dear Mr. Boyland:

Enclosed please find responses to your financial-related questions on behalf of ArcelorMittal USA for the above-referenced sunset review.

Please contact the undersigned with any questions regarding this submission.

Respectfully submitted,

PAUL C. ROSENTHAL
KATHLEEN W. CANNON
R. ALAN LUBERDA
Counsel to ArcelorMittal USA LLC

Attachment

AMUSA'S RESPONSES TO FINANCIAL QUESTIONS FROM DAVID BOYLAND

Question 1. Table II-8 and III-10. For most of the period the relevant volume and value information in table II-8 and III-10 reconcile or are only different due to rounding. The interim period, however, reflects differences in value (both periods) and a minor difference in volume (interim 2012). To the extent that both tables cover the same time period, please examine each table with respect to the interim period in order to determine where corrections are necessary.

Table III-10 is correct as reported. In table II-8, the value of transfers to related firms should be revised to $9,736 for January through June 2011 and $9,252 in January through June 2012.

Question 2. Table III-9 and table III-10. The company reports non-recurring items in 2006 and 2008 but does not indicate where these non-recurring items are included in table III-10. Please indicate in which table III-10 line item the amounts reported in table III-9 are reported. Please also confirm that the amounts reported in table III-9 represent the amounts allocated to table III-10, as opposed to aggregate/unallocated amounts.

All amounts from table III-9 are included in "all other expense items" in table III-10. The amounts shown in table III-9 and included in table III-10 are the amounts allocated to corrosion resistant steel. Please note that table III-9 should be updated for 2007 to include an impairment recorded for the sale of Sparrows Point. The amount allocated to corrosion resistant steel is $35 million.

Question 3. Table III-11. The company reported operating losses in 2006 through 2010 with the absolute amount of operating loss highest in 2006 and lowest in 2010. From the company's perspective what are the important factors which help explain the company's transition from operating losses throughout much of the period to profitability in 2011 through interim 2012?

Operating losses were incurred in 2006 through 2010 as AMUSA was unable to obtain prices that covered its costs in a challenging market environment. AMUSA has struggled to reduce its costs, including by closing two facilities in 2009. Changes in its effective metal margin and increased sales after 2009 helped to improve AMUSA's gross profits in interim 2012 but concerns remain regarding the economy, costs, prices and other market factors.

Question 4. Table III-10. In conjunction with higher sales volume in interim 2012 compared to interim 2011, there was a notable increase in operating income in interim 2012. In large part, this appears to be due to an increase in gross profit margin which in turn appears to be due to an effective increase in effective metal margin and lower average other factory costs. Is this conclusion correct? From the company's perspective what were the primary factors which explain the increase in operating income in interim 2012 compared to interim 2011?

See response to question 3.

Question 5: Table III-10. Please generally describe what the primary components of raw material costs represent and whether there were any significant changes in the composition of these costs. Please also identify the primary galvanizing inputs and indicate whether these are included in raw material costs or in "other factory costs."

The primary components of raw material costs are, in order, iron ore, coke, coal, scrap alloys and zinc. There have not been any significant changes in the composition of these costs. Galvanizing requires the addition of zinc. Zinc is included in raw material costs.

Question 6. With respect to the pattern of period-to-period change in average other factory costs, please comment on the extent to which this reflects changes in the company's underlying cost structure during the period examined, as well as variations in factors such as capacity utilization.

Other factory costs will include items such as freight, energy, maintenance, supplies, services, utilization (impact on fixed costs such as property taxes and depreciation) and other costs.

In 2006 through 2008 facilities such as Sparrows Point, Hennepin & Lackawanna were included in corrosion resistant production and represented higher operating costs. Sparrow Point was sold, and Hannepin and Lackawanna have been idled.

Question 7. Table III-10. The company reports notably higher levels of "all other expenses" in 2007 and 2008. Please generally describe what items account for the higher levels of "all other expenses" in 2007 and 2008.

In 2008 "all other expenses" includes nearly $40 million of expense associated with the shutdown of Hennepin & Lackawanna facilities.

2007 includes $35 million of impairment for the sale of Sparrows Point.

Question 8. Table III-10. In 2010 and subsequent periods, the sign for interest expense in table III-10 changes to what is interpreted to reflect a net positive income/gain amount. Please indicate how the change in interest expense sign in table III-10 should be interpreted.

AMUSA reports financials using US GAAP & IFRS. All filings for trade cases are reported under US GAAP.

The interest expense (income) from 2010 to 2011 is primarily associated with the US GAAP entries required for certain operating leases and the recognition of deferred employee benefit interest.

Question 9. Table III-12. Please describe the investments which account for the notably higher level of capital expenditures in 2006, 2007, and 2008 as reported in in table III-12.

A portion of the higher capital expense prior to 2009 are attributed to 3 facilities no longer a part of AMUSA (Sparrows Point, Hennepin & Lackawanna). Additionally, for the years of 2006 to 2008 AMUSA also performed blast furnace relines at our Cleveland, Indiana Harbor and Burns Harbor facilities.

AMUSA has substantially reduced the amount of capital reinvested into existing facilities in an effort to conserve cash due to the economic crisis.

Question 10. Table III-12. Please describe the R&D expenses reported in table III-12.

The costs included in the R&D for table III-12 generally represent the costs associated with running an R&D department, including labor, travel, facility expenses, etc.

Question III-6 and schedule III-7. The company has reported that it does not purchase inputs from related parties which are used in the production of corrosion-resistant steel. To the extent that public information generally indicates that the company owns coal and iron-ore related operations, please explain the basis of the company's response to question III-6 indicating that it does not purchase inputs from related parties. As appropriate, please identify in schedule III-7 all relevant related parties who transfer inputs which are ultimately consumed in the production of corrosion-resistant steel; e.g., as appropriate, coal and iron-ore related operations, as well as other relevant entities. In conjunction with identifying the related party, please identify the corresponding input.

AMUSA does not buy raw material inputs from other ArcelorMittal entities. All iron ore consumed by AMUSA is either purchased from 3rd party suppliers or sourced from two iron ore mines that are a part of AMUSA. All ore consumed by AMUSA from the two owned ore mines is consumed at cost.

AMUSA does not buy coal from ArcelorMittal entities. All coal consumed in the steelmaking process is purchased from 3rd party suppliers.

Question III-8. As appropriate, please specify the steps taken to eliminate all relevant intercompany profit from costs reported in table III-10. Please confirm, as appropriate, that all relevant profit has been eliminated from transferred inputs and, as appropriate, specify the amounts actually eliminated in each period.

AMUSA does not buy raw materials from other ArcelorMittal entities or related parties, and therefore there is no intercompany profit to eliminate.

BUSINESS PROPRIETARY CERTIFICATE OF SERVICE

Corrosion-Resistant Carbon Steel Flat Products from Germany and Korea
ITC Inv. Nos. 701-TA-350 and 731-TA-616 and 618 (3rd Review)

I hereby certify that on September 7, 2012, copies of the foregoing business proprietary submission were served upon the following by hand-delivery:

On behalf of ThyssenKrupp Steel Europe AG, ThyssenKrupp Steel USA, LLC, ThyssenKrupp Steel North America, Inc., and Salzgitter Flachstahl GmbH:
Kenneth J. Pierce, Esq.
HUGHES, HUBBARD & REED LLP
1775 I Street, N.W.
Washington, D.C. 20006-2401

On behalf of Nucor Corporation:
Alan H. Price, Esq.
WILEY REIN LLP
1776 K Street, N.W.
Washington, D.C. 20006

On behalf of Steel Dynamics Incorporated:
Roger B. Schagrin, Esq.
SCHAGRIN ASSOCIATES
900 7th Street, N.W., Suite 500
Washington, D.C. 20001

On behalf of United States Steel Corporation:
James C. Hecht, Esq.
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
1440 New York Avenue, N.W.
Washington, D.C. 20005-2111

On behalf of AK Steel Corporation:
Joseph W. Dorn, Esq.
KING & SPALDING LLP
1700 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-4706

On behalf of Apollo Metals Ltd. and Thomas Steel Strip Corporation:
James R. Cannon, Esq.
CASSIDY LEVY KENT LLP
2000 Pennsylvania Avenue, NW
Suite 4500
Washington, DC 20006

On behalf of POSCO, Dongbu Steel Co., Ltd., Union Steel Manufacturing Co., Ltd., and Hyundai HYSCO Co.:
Donald B. Cameron, Esq.
MORRIS, MANNING & MARTIN LLP
1333 H Street, N.W.
Suite 820
Washington, D.C. 20005

KATHLEEN W. CANNON