

May 18, 2015

VIA E-FILING

The Honorable Penny S. Pritzker
Secretary of Commerce
Attn: Import Administration
Central Records Unit, Room 1870
U.S. Department of Commerce
14th Street & Constitution Avenue, N.W.
Washington, D.C. 20230

PUBLIC DOCUMENT

Case No.: A-821-808
Total Pages: 19
2003 Suspension Agreement

Proprietary information has been removed from
pages 5 and 6.

Attn: Sally Gannon

Re: **Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation: Response to Petitioner's Request to Terminate the Agreement**

Dear Secretary Pritzker:

On behalf of Joint Stock Company Severstal (Severstal), a producer of cut-to-length carbon steel plate, we hereby respond to the petitioner's letter to the Department of Commerce ("Department"), filed May 5, 2015, requesting that the Department terminate the Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation (the "Agreement")¹. For the reasons put forth below, the Department should not terminate the agreement as requested by petitioners.

¹ See *Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation*, 68 Fed. Reg. 3,859 (Dep't Commerce Jan. 27, 2003) ("Agreement").

I. CONTINUATION OF THE AGREEMENT IS IN THE PUBLIC INTEREST

Petitioner's request attempts to present a dire picture of large volumes of Russian CTL plate surging into the U.S. market in ever-increasing amounts and undercutting and suppressing U.S. prices to the detriment of the U.S. industry and the public interest. However, once the rhetoric is set aside and the actual numbers and statistics are examined objectively, it is clear that this is not the case. Russian volumes remain low, and prices commensurate with other merchandise of the same quality. Petitioner also tries to leverage the current political climate between the United States and Russia to its own benefit - again in the name of public interest. The Department should not allow this Agreement with Russian steel companies, *i.e.*, not the Russian government, to be politicized by petitioner.

a. The volume of Russian CTL plate imports is not significant

Petitioner provides numerous statistics, purporting to show increasingly large volumes of Russian imports of CTL plate entering the United States, *e.g.*, 55,045 MT in 2014, and 9,495 MT in January-March 2015.² Petitioner then merely asserts that this volume of Russian steel imports is injurious to the domestic steel market. However, petitioner provides no analysis that would show how this volume is injurious. That is because this volume of imports is clearly an insignificant amount, and cannot and does not injure the domestic market.

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² See Petitioner's May 5, 2015 Request to Terminate the Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation ("Petitioner's Request to Terminate").

Severstal does not have current apparent U.S. consumption for 2014. However, Petitioners could easily calculate the number.³ They likely choose not to because that would have shown that the "large" volume of 55,045 MT cited by petitioners was in fact insignificant and could not be injurious to the domestic industry. The most recent data that Severstal has access to is from 2010, assuming that the market has not grown since then the imports of Severstal in 2014 would have constituted a mere 1.3% of apparent U.S. consumption.⁴ These are clearly not large amounts by any reasonable measure.

b. the cited percent increases in volume of imports from Russia are misleading and do not show an injurious increase in volume.

Petitioner attempts to paint a picture of a huge surge in Russian CTL Plate imports by repeating referring to "Russian producers' exports of large and increasing volumes of low-priced CTL plate to the U.S. market" that "in 2014 grew by more than 2,800% from 2013 levels, reaching over 55,000 metric tons last year (emphasis in the original)."⁵ As demonstrated above, the volume of "over 55,000 metric tons" is an insignificant amount relative to overall U.S. consumption of the product. Furthermore, the increase of 2,800% is merely due to the fact that there were almost no imports in 2013 (*i.e.*, 1,877 MT), not due to a large amount of imports in 2014.⁶ In fact, Russian CTL plate imports in 2014 are much less than half of the 2011 imports.⁷

The petitioner's statement that "this trend is continuing" is blatantly untrue, as the statistics they cite do not show a continuing increase of 2,800% in 2015, but merely a modest

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³ We also note that the U.S. International Trade Commission will soon commence its review of this Order, and will make available contemporaneous U.S. apparent consumption figures.

⁴ See Attachment 1: table I-10 from Cut-to-Length Carbon-Quality Steel Plate from India, Indonesia, Italy, Japan, and Korea Investigation Nos. 701-TA-388-391 and 731-TA-817-821 (Second Review), Pub. 4296 (December 2011).

⁵ Petitioner's Request to Terminate at 2.

⁶ *Id.* at Exhibit 1.

⁷ See Attachment 2: U.S. Commerce Data.

increase of 6,879 MT in January to March year-to-date 2015 data.⁸ Again, though an increase of 263 percent, still an insignificant volume relative to the overall U.S. market. What is amazing is that Petitioners think that the Department does not understand basic statistics and would fall for such overstatement and elementary manipulation of the statistics.

Petitioner's arguments that it is in the public interest to terminate the Agreement because the volumes of Russian CTL Plate are large enough to injure the U.S. domestics are unsupported by the record evidence. The volumes of Russian product are insignificant, and Petitioner's own submitted data show that 2015 imports do not even rise to the level to satisfy the ITC 3 percent negligibility standard for injury.⁹ Furthermore, their use of the fact that there were extremely small volumes in 2013 and early 2014 to attempt show that there are injurious increases is easily seen as hyperbole. In fact, the imports from Russia have been and remain very low in volume, despite petitioner's efforts to paint them otherwise. The evidence regarding low volume only supports a conclusion that the Agreement is serving its purpose.

c. Petitioner's comparison of US and Russian CTL plate prices is fundamentally flawed

As demonstrated above, the volume of Russian imports is far too small relative to overall U.S. consumption to have any effect on U.S. prices. The Department should conclude on this basis alone that the Russian imports are not suppressing prices. However, if the Department chooses to entertain petitioner's arguments on this issue further, it should note that the petitioner's comparisons are not made on an apples-to-apples basis. Thus, their price comparisons are distortive and meaningless.

⁸ See Petitioner's Request to Terminate at Exhibit 1.

⁹ *Id.*

For example, petitioner's first price comparison is between "the average price for CTL plate in the U.S. market" according to their data source, and the normal value ("NV") for the CONNUM with the lowest NV for Russian producer Severstal.¹⁰ Next, petitioner cherry picks other CONNUMs with the next lowest NVs to compare with this overall average U.S. price.¹¹ Petitioner's subsequent comparisons all employ the same apples-to-oranges methodology, comparing NVs for particular CONNUMs to average U.S. prices.¹² Furthermore, the petitioner's flawed attempt to compare U.S. average steel prices, and world import prices, to Russian prices for CTL plate ignores the fact that the Russian CTL plate at issue is generally a lower-value []. Therefore, it is only natural that its prices are lower than the average of all U.S. CTL plate prices. Additionally, the U.S. domestic prices may represent smaller volumes, "near-term" delivery, and other price-affecting terms of sale. Finally, the comparison of prices to NVs is invalidated by the simple fact that Severstal does not sell its product at the NVs, but rather at market prices higher than the NVs. The result, obviously, is a distorted and meaningless comparison.

Furthermore, in what we can only guess is an effort to malign Severstal, petitioner states that in one offer for sale, [].¹³ This statement is baseless and extremely reckless. The referenced offer states nothing of the kind, merely commenting [

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¹⁰ *Id.* at 5.

¹¹ *Id.*

¹² *See* Petitioner's Request to Terminate at 5-6.

¹³ *See id.* at 7.

].¹⁴ There

is simply no reasonable way to construe these statements to state what petitioner contends.

d. Petitioner has presented no evidence to tie Russian imports to falling U.S. prices.

Petitioner contends that the "increasing levels of these extremely low-priced Russian CTL plate imports" are depressing U.S. prices.¹⁵ As demonstrated above, the volume of Russian CTL plate is negligible, the alleged large increases are a mirage caused by extremely low volumes in the base years, and the prices are not low when correctly compared to comparable merchandise. Thus, petitioner's conclusion that falling U.S. prices are due to Russian CTL imports is unsupported.

In fact, the correct bases for falling U.S. prices is quite clear. Prices are falling as a result of natural price cycles in raw materials, growth deceleration of the world economy, and most importantly the fact of steel overproduction and excess capacities. The prices for cold-rolled steel, long products, metal scrap are also falling in Europe and China. The world average has the same trend. Thus, the same situation with prices is occurring internationally and for all steel products, and has absolutely nothing to do with Russian imports.¹⁶ The best illustration of the fact that Russian steel prices are not the factor causing U.S. steel prices to drop is the dynamics of the price of hot rolled coils. Since the Department's announcement in October 2014 and subsequent termination of the Agreement Suspending the Antidumping Investigation of Certain Hot-Rolled Flat-Rolled Carbon-Quality Steel Products from the Russian Federation, the U.S.

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market price fell from \$720 USD/MT to current 498 USD/MT.

¹⁴ *Id.* at 7 and Exhibit 4.

¹⁵ *Id.* at 8.

¹⁶ See Attachment 3: Steel Benchmark Prices.

e. It is in the public interest for the United States to comply with its agreements

Petitioner asserts without citation that the Agreement "is a privilege, not a right, for foreign producers" that "we do not grant even to some of our most trusted trading partners,"¹⁷ and makes reference to "Russian steel production and exports to the United States in the current geopolitical environment."¹⁸ By these references it appears that petitioner is implying that this Agreement should be used as a political tool against the Russian government. The Agreement, however, is with Russian companies, not the Russian government, therefore this is not a political issue despite petitioner's efforts to frame it as such for its own benefit. The Department should not allow the petitioner to use the unfortunate current political climate to its advantage in manipulating the Department to terminate this Agreement for political purposes. Furthermore, and importantly, there is a public interest in the United States abiding by its agreements such as this one, and not terminating merely due to current political trends.

II. RUSSIAN PRODUCERS HAVE NOT VIOLATED THE AGREEMENT

a. Petitioner's allegation of sale made without NVs is spurious

Petitioner's assert that the Department should terminate the Agreement because Russian producers may have violated the agreement. We note first that an allegation that a party "may have" violated an agreement is not a basis for termination. Petitioner's allegation goes to great lengths to explain that sales cannot be made without issued NV's for the respective period, then alleges violations based on "shipments" and "entries" of subject merchandise.¹⁹ Petitioner's allegation clearly relies on temporal differences between sale date and shipment and entry dates to imply impropriety that never actually took place.

¹⁷ Petitioner's Request to Terminate at 8.

¹⁸ *Id.* at 3.

¹⁹ *Id.* at 11 and 12.

III. CONCLUSION

As demonstrated above, the volume of Russian CTL plate imports is low, and increases are minimal. Moreover, these low volumes are not undercutting or depressing prices in the U.S. market. Further, Russian producers and exporters have not violated the terms of the Agreement. Therefore, the Agreement continues to work and the Department should not terminate it

The Russian steel industry appreciates the Department's attention to this matter.

Respectfully submitted,

/s/ Mark P. Lunn

Mark P. Lunn, Partner

Eugene Degnan

Counsel to Joint Stock Company Severstal

REPRESENTATIVE CERTIFICATION

I, Eugene Degnan, with Dentons US LLP, counsel or representative to Joint Stock Company Severstal, certify that I have read the attached submission of response to the petitioner's request to terminate suspension agreement, pursuant to the Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation (A-821-808). In my capacity as counsel and reviewer of this submission, I certify that the information contained in this submission is accurate and complete to the best of my knowledge. I am aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD proceeding, the U.S. Department of Commerce may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature: _____

Date: _____

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COMPANY CERTIFICATION

I, George V. Bishaev, currently employed by AO Severstal Management certify that I prepared or otherwise supervised the preparation of the attached submission of Response to Petitioner's Request to Terminate the Agreement, submitted May 18, 2015, pursuant to the Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon Steel Plate from the Russian Federation (A-821-808). I certify that the public and any business proprietary information of Severstal contained in this submission is accurate and complete to the best of my knowledge. I am aware that the information contained in this submission may be subject to verification or corroboration (as appropriate) by the U.S. Department of Commerce. I am also aware that U.S. law (including, but not limited to, 18 U.S.C. 1001) imposes criminal sanctions on individuals who knowingly and willfully make material false statements to the U.S. Government. In addition, I am aware that, even if this submission may be withdrawn from the record of the AD proceeding, the Department may preserve this submission, including a business proprietary submission, for purposes of determining the accuracy of this certification. I certify that a copy of this signed certification will be filed with this submission to the U.S. Department of Commerce.

Signature:

Date:

18.V.2015

CERTIFICATE OF SERVICE
Agreement Suspending the Antidumping Investigation of Certain Cut-to-Length Carbon
Steel Plate from the Russian Federation
Public Service List: A-821-808

The undersigned hereby certifies that on the 18 day of May, 2015, copies of the foregoing document were served on all parties by first class mail postage prepaid:

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/s/ Natalya Chepura
Natalya Chepura

Attachment 1

Table I-10

CTL plate: U.S. shipments of domestic product, U.S. imports, by sources, and apparent U.S. consumption, 2005-10, January-June 2010, and January-June 2011

Item	Calendar year						January-June	
	2005	2006	2007	2008	2009	2010	2010	2011
Quantity (short tons)								
U.S. producers' U.S. shipments	6,049,832	7,036,861	6,936,367	7,164,233	4,009,909	5,378,921	2,666,510	3,160,586
U.S. imports from -								
India	3,856	6,542	1,167	310	165	32	32	316
Indonesia	2,682	41	1,661	97	0	0	0	0
Italy	9,215	1,212	3,814	337	4,904	718	429	428
Japan	***	***	***	***	***	***	***	***
Korea (S)	***	***	***	***	***	***	***	***
Subtotal subject	***	***	***	***	***	***	***	***
Korea (NS)	***	***	***	***	***	***	***	***
Nonsubject countries	***	***	***	***	***	***	***	***
Subtotal nonsubject	***	***	***	***	***	***	***	***
Total U.S. imports	795,303	1,341,814	1,026,836	824,357	357,850	551,029	285,027	336,175
Apparent U.S. consumption	6,845,135	8,378,675	7,963,203	7,988,590	4,367,759	5,929,950	2,951,537	3,496,761
Value (1,000 dollars)								
U.S. producers' U.S. shipments	4,366,799	5,342,358	5,392,168	7,061,715	2,704,581	3,961,873	1,897,431	2,855,479
U.S. imports from--								
India	3,913	4,358	1,146	466	298	55	55	625
Indonesia	1,817	37	985	128	0	0	0	0
Italy	8,939	2,206	4,395	1,277	6,402	2,369	1,414	1,121
Japan	***	***	***	***	***	***	***	***
Korea (S)	***	***	***	***	***	***	***	***
Subtotal subject	***	***	***	***	***	***	***	***
Korea (NS)	***	***	***	***	***	***	***	***
Nonsubject countries	***	***	***	***	***	***	***	***
Subtotal nonsubject	***	***	***	***	***	***	***	***
Total U.S. imports	578,824	894,023	762,476	903,018	337,604	482,282	247,941	326,263
Apparent U.S. consumption	4,945,623	6,236,381	6,154,644	7,964,733	3,042,185	4,444,155	2,145,372	3,181,742
<p>Note.--"S" denotes subject imports from Korea and consists of CTL plate produced by Dongkuk and other mills, excluding POSCO. "NS" denotes nonsubject imports from Korea and consists of CTL plate produced by POSCO. Note.--Because of rounding, figures may not add to the totals shown.</p>								
Source: Compiled from data submitted in response to Commission questionnaires and from adjusted official Commerce statistics.								

Attachment 2

Metric tons

Country	Census Data									Share in 2014, %	Share in 2015, %
	Annual Total Quantity 2007	Annual Total Quantity 2008	Annual Total Quantity 2009	Annual Total Quantity 2010	Annual Total Quantity 2011	Annual Total Quantity 2012	Annual Total Quantity 2013	Annual Total Quantity 2014	Annual Total Quantity 2015 (through March final)		
WORLD	1203520	1061985	447123	630727	984642	1167258	813878	1605830	487811	100%	100%
KOREA	77524	42613	13840	10162	69137	191195	73573	276666	126983	17%	26%
CANADA	326878	346244	178206	223940	248812	222212	162076	169755	36378	11%	7%
BRAZIL	9044	12556	13755	37808	39860	113925	20096	124701	14046	8%	3%
TURKEY	1729	185.6	16584	717.8	33434	56443	18215	105698	12340	7%	3%
FRANCE	16425	17064	12450	23277	24605	40073	81493	102640	87033	6%	18%
UNITED KINGDOM	13281	7100	1675	6410	19085	25968	29779	88395	9456	6%	2%
ITALY	2818	91	4154	539.7	891.6	42417	42183	88292	23618	5%	5%
FINLAND	2400	10855	12667	24432	9462	22896	25173	78756	1108	5%	0%
MEXICO	2335	1064	7053	17857	46433	22944	50759	76078	4647	5%	1%
JAPAN	35202	43822	21130	18719	24831	54842	44919	69774	28033	4%	6%
GERMANY	43900	37450	21696	96884	71866	86525	124587	65090	68651	4%	14%
RUSSIA	34222	77757	7327	34143	122984	29528	1876	55045	9494	3%	2%

<http://enforcement.trade.gov/steel/license/smp/Census>

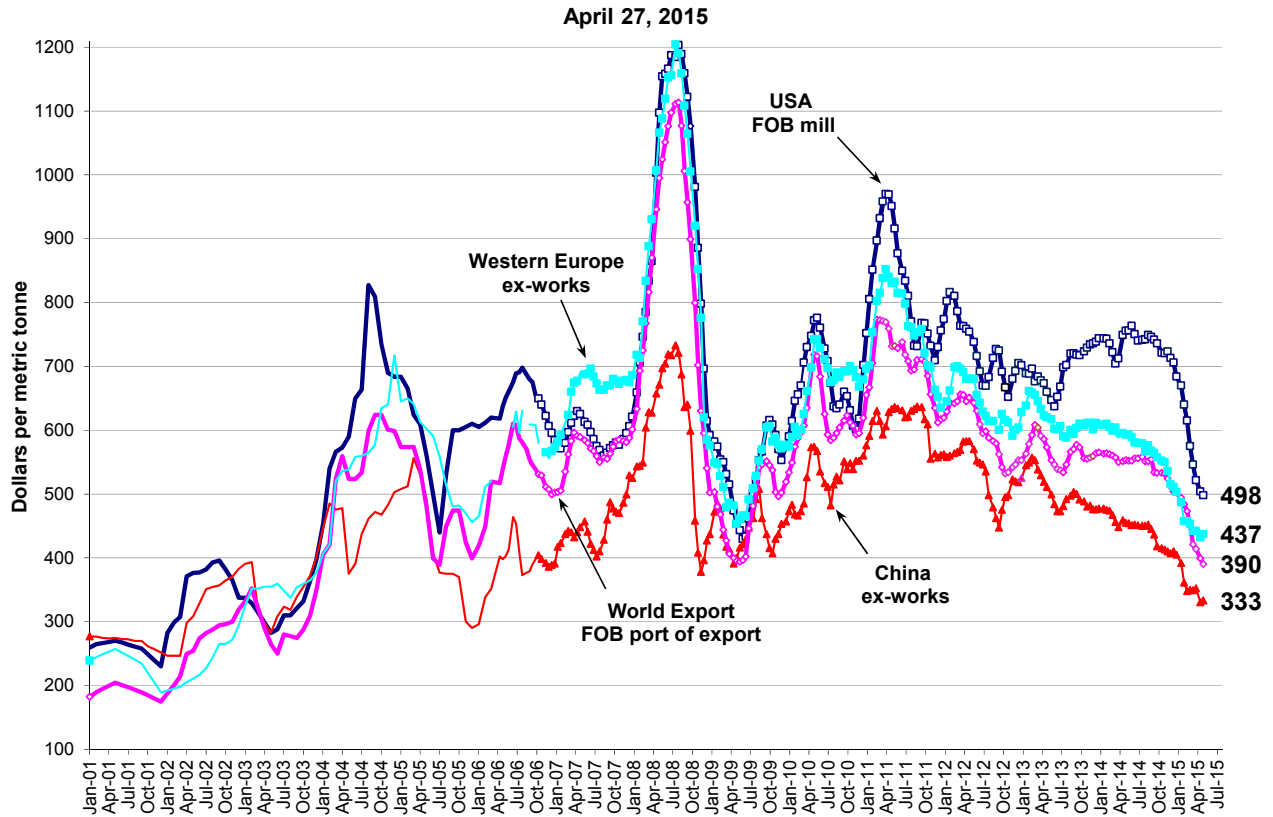
Attachment 3



SteelBenchmarker™ HRB Price

USA, China, Western Europe and World Export

(WSD's PriceTrack data, Jan. 2001 - March 2006; SteelBenchmarker data begins April 2006)



Attachment 3



USA

FOB mill*

Dollars per Metric Tonne

	-----HRB-----			-----CRC-----			-----Plate-----			-----Rebar-----		
	Price	Dlr Chng	Pct Chng	Price	Dlr Chng	Pct Chng	Price	Dlr Chng	Pct Chng	Price	Dlr Chng	Pct Chng
9-Dec-13	738	2	0.3%	859	1	0.1%	837	7	0.8%	na	-	-
23-Dec-13	744	6	0.8%	861	2	0.2%	867	30	3.6%	na	-	-
13-Jan-14	744	0	0.0%	860	-1	-0.1%	865	-2	-0.2%	na	-	-
27-Jan-14	743	-1	-0.1%	861	1	0.1%	877	12	1.4%	na	-	-
10-Feb-14	736	-7	-1.0%	850	-11	-1.3%	878	1	0.1%	na	-	-
24-Feb-14	722	-14	-1.9%	835	-15	-1.8%	873	-5	-0.6%	na	-	-
10-Mar-14	704	-18	-2.5%	826	-9	-1.1%	903	30	3.5%	na	-	-
24-Mar-14	712	8	1.1%	833	7	0.8%	902	-1	-0.2%	na	-	-
14-Apr-14	749	37	5.2%	856	23	2.7%	897	-5	-0.6%	na	-	-
28-Apr-14	756	7	0.9%	881	25	2.9%	899	2	0.2%	na	-	-
12-May-14	756	0	0.1%	870	-11	-1.2%	923	24	2.7%	na	-	-
26-May-14	763	7	1.0%	889	19	2.2%	922	-1	-0.1%	na	-	-
9-Jun-14	750	-13	-1.7%	873	-16	-1.8%	927	5	0.5%	na	-	-
23-Jun-14	740	-10	-1.4%	862	-11	-1.3%	946	19	2.0%	na	-	-
14-Jul-14	741	1	0.2%	858	-4	-0.5%	951	5	0.5%	na	-	-
28-Jul-14	742	1	0.1%	870	12	1.4%	951	0	0.0%	na	-	-
11-Aug-14	749	7	0.9%	873	3	0.3%	942	-9	-0.9%	na	-	-
25-Aug-14	746	-3	-0.4%	877	4	0.4%	962	20	2.1%	na	-	-
8-Sep-14	742	-4	-0.6%	861	-15	-1.7%	964	2	0.2%	na	-	-
22-Sep-14	736	-6	-0.8%	854	-8	-0.9%	948	-16	-1.6%	722	-	-
13-Oct-14	721	-15	-2.0%	848	-5	-0.6%	945	-3	-0.3%	702	-20	-2.8%
27-Oct-14	720	-1	-0.1%	839	-9	-1.1%	928	-17	-1.8%	na	-	-
10-Nov-14	723	3	0.4%	841	2	0.2%	920	-8	-0.9%	na	-	-
24-Nov-14	713	-10	-1.4%	831	-10	-1.2%	891	-29	-3.2%	na	-	-
8-Dec-14	706	-7	-1.0%	827	-4	-0.5%	882	-9	-1.0%	na	-	-
22-Dec-14	684	-22	-3.1%	816	-11	-1.3%	885	3	0.3%	na	-	-
12-Jan-15	670	-14	-2.0%	795	-21	-2.6%	819	-66	-7.5%	na	-	-
26-Jan-15	640	-30	-4.5%	779	-16	-2.1%	806	-13	-1.6%	na	-	-
9-Feb-15	615	-25	-3.9%	755	-24	-3.1%	773	-33	-4.1%	na	-	-
23-Feb-15	575	-40	-6.5%	717	-38	-5.0%	755	-18	-2.3%	na	-	-
9-Mar-15	546	-29	-5.0%	701	-16	-2.2%	741	-14	-1.9%	na	-	-
23-Mar-15	522	-24	-4.5%	675	-26	-3.7%	702	-39	-5.3%	na	-	-
13-Apr-15	504	-18	-3.4%	646	-29	-4.3%	660	-42	-5.9%	na	-	-
27-Apr-15	498	-6	-1.2%	627	-19	-2.9%	644	-16	-2.4%	na	-	-
11-May-15												
25-May-15												

Notes: * Ex-works (the same as FOB mill)

Prices released on Wednesdays following the 2nd and 4th Mondays of the month at 9:00 AM to Price Assessment Providers. If a price is not indicated, fewer than ten (10) price inputs were received at that time. The first price release was for April 10, 2006 for data go to steelbenchmarker.com/files/history2.pdf.

For product specifications refer to last page, or go to steelbenchmarker.com/specifications.



Price History

Tables and Charts

USA

China

Western Europe

World Export

Hot-rolled Band

Cold-rolled Coil

Standard Plate

Rebar

Steel Scrap

Register at: www.steelbenchmarker.com

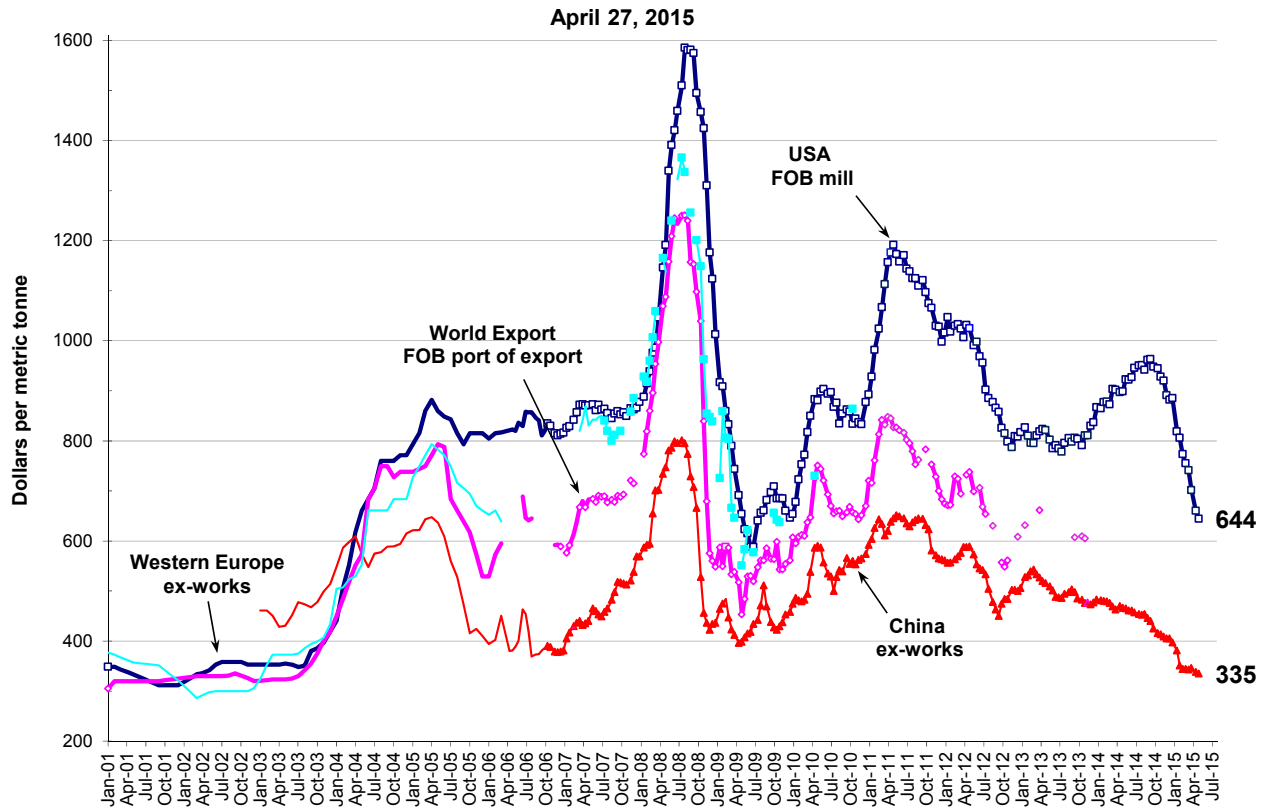
Attachment 3



SteelBenchmarker™ Plate Price

USA, China, Western Europe and World Export

(WSD's PriceTrack data, Jan. 2001 - March 2006; SteelBenchmarker data begins April 2006)



Attachment 3



USA

FOB mill*

Dollars per Metric Tonne

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9-Dec-13	738	2	0.3%	859	1	0.1%	837	7	0.8%	na	-	-
23-Dec-13	744	6	0.8%	861	2	0.2%	867	30	3.6%	na	-	-
13-Jan-14	744	0	0.0%	860	-1	-0.1%	865	-2	-0.2%	na	-	-
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10-Feb-14	736	-7	-1.0%	850	-11	-1.3%	878	1	0.1%	na	-	-
24-Feb-14	722	-14	-1.9%	835	-15	-1.8%	873	-5	-0.6%	na	-	-
10-Mar-14	704	-18	-2.5%	826	-9	-1.1%	903	30	3.5%	na	-	-
24-Mar-14	712	8	1.1%	833	7	0.8%	902	-1	-0.2%	na	-	-
14-Apr-14	749	37	5.2%	856	23	2.7%	897	-5	-0.6%	na	-	-
28-Apr-14	756	7	0.9%	881	25	2.9%	899	2	0.2%	na	-	-
12-May-14	756	0	0.1%	870	-11	-1.2%	923	24	2.7%	na	-	-
26-May-14	763	7	1.0%	889	19	2.2%	922	-1	-0.1%	na	-	-
9-Jun-14	750	-13	-1.7%	873	-16	-1.8%	927	5	0.5%	na	-	-
23-Jun-14	740	-10	-1.4%	862	-11	-1.3%	946	19	2.0%	na	-	-
14-Jul-14	741	1	0.2%	858	-4	-0.5%	951	5	0.5%	na	-	-
28-Jul-14	742	1	0.1%	870	12	1.4%	951	0	0.0%	na	-	-
11-Aug-14	749	7	0.9%	873	3	0.3%	942	-9	-0.9%	na	-	-
25-Aug-14	746	-3	-0.4%	877	4	0.4%	962	20	2.1%	na	-	-
8-Sep-14	742	-4	-0.6%	861	-15	-1.7%	964	2	0.2%	na	-	-
22-Sep-14	736	-6	-0.8%	854	-8	-0.9%	948	-16	-1.6%	722	-	-
13-Oct-14	721	-15	-2.0%	848	-5	-0.6%	945	-3	-0.3%	702	-20	-2.8%
27-Oct-14	720	-1	-0.1%	839	-9	-1.1%	928	-17	-1.8%	na	-	-
10-Nov-14	723	3	0.4%	841	2	0.2%	920	-8	-0.9%	na	-	-
24-Nov-14	713	-10	-1.4%	831	-10	-1.2%	891	-29	-3.2%	na	-	-
8-Dec-14	706	-7	-1.0%	827	-4	-0.5%	882	-9	-1.0%	na	-	-
22-Dec-14	684	-22	-3.1%	816	-11	-1.3%	885	3	0.3%	na	-	-
12-Jan-15	670	-14	-2.0%	795	-21	-2.6%	819	-66	-7.5%	na	-	-
26-Jan-15	640	-30	-4.5%	779	-16	-2.1%	806	-13	-1.6%	na	-	-
9-Feb-15	615	-25	-3.9%	755	-24	-3.1%	773	-33	-4.1%	na	-	-
23-Feb-15	575	-40	-6.5%	717	-38	-5.0%	755	-18	-2.3%	na	-	-
9-Mar-15	546	-29	-5.0%	701	-16	-2.2%	741	-14	-1.9%	na	-	-
23-Mar-15	522	-24	-4.5%	675	-26	-3.7%	702	-39	-5.3%	na	-	-
13-Apr-15	504	-18	-3.4%	646	-29	-4.3%	660	-42	-5.9%	na	-	-
27-Apr-15	498	-6	-1.2%	627	-19	-2.9%	644	-16	-2.4%	na	-	-
11-May-15												
25-May-15												

Notes: * Ex-works (the same as FOB mill)

Prices released on Wednesdays following the 2nd and 4th Mondays of the month at 9:00 AM to Price Assessment Providers. If a price is not indicated, fewer than ten (10) price inputs were received at that time. The first price release was for April 10, 2006 for data go to steelbenchmarker.com/files/history2.pdf.

For product specifications refer to last page, or go to steelbenchmarker.com/specifications.