



March 16, 2018

The President
The White House
1600 Pennsylvania Avenue, NW
Washington, DC 20500

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

Dear Mr. President and Mr. Secretary:

As a critical segment of the economy that is called upon to build and re-build our drinking water and wastewater infrastructure for the future, the Water and Wastewater Equipment Manufacturers Association (WWEMA) would like to express our concerns related to the recently imposed 10 percent and 25 percent tariffs on aluminum and steel, respectively. Every member of WWEMA supports keeping America safe and doing our part to keep our economy strong. We understand the intentions of the proposed tariffs. However, our industry and organization has first-hand experience with the unintended consequences that arise from well-intentioned actions. We have only to look back at implementation of the American Recovery and Reinvestment Act (ARRA) of 2009 which, while well-intended, resulted in many of the actions we see and may see repeated in response to the announced tariffs. These include:

- Panic buying of raw materials
- Insufficient U.S. steel and aluminum capacity to meet cross-sector industry needs
- Current and anticipated price increases
- Increased costs for American tax payers
- A slowdown in current infrastructure projects due to unforeseen cost escalation affecting current fixed price contracts
- Unmanageable risk profiles causing significant equipment and construction price increases resulting in postponement or abandonment of future infrastructure projects due to inadequate funding resulting from escalation of anticipated project budgets
- Quality products omitted from projects due to restrictions
- Lack of clarity and education on implementation of the program
- Possible retaliation from other nations
- More government oversight and red-tape

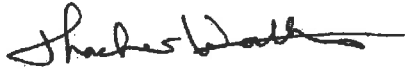
To help minimize potential unintended consequences, it is critical that implementation guidance and policies be clear and timely, that the landscape of affected products not continually shift, and that implementation be consistent. We welcome the opportunity to provide further input on how this proposal can be best implemented to avoid unintended consequences – the most serious of which is a work and project slow down due to uncertainty and lack of clarity.

This is particularly critical as you and the U.S. Congress move forward on a new Infrastructure Plan for the Nation that emphasizes streamlining the process, bringing projects in on time and budget, and building a strong America through affordable infrastructure projects. We are already experiencing pricing increases and no guarantee of firm pricing for more than 30 days. Add this to long-term

infrastructure projects and the inability to include escalation clauses will be devastating to small and large companies alike.

We were pleased to learn during the official announcement that Canada and Mexico, whom we have come to depend on as part of our supply chains and importers of our goods and services, will be exempted for now. Other countries should be given an opportunity to negotiate a win-win trade relationship not only for the steel and aluminum industries but all American businesses. Questions regarding this letter or additional follow-up should be directed to Vanessa M. Leiby, Executive Director of WWEMA, at (703) 444-1777 or vanessa@wwema.org.

Most Respectfully,



Thacher Worthen
WWEMA Chairman and
President and CEO
Schreiber LLC
Trussville, AL



Deborah LaVelle
Chair of WWEMA Leg/Reg Committee
President and CEO
Aquarius Technologies, LLC
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The Water and Wastewater Equipment Manufacturers Association (WWEMA) is a Washington, D.C.-based non-profit trade association representing water and wastewater technology manufacturers and service providers since 1908. We advocate, inform, and connect our members with key policy and decision-makers and help our members increase their competitiveness and profitability in the U.S. and abroad. Our members supply the most sophisticated leading-edge technologies and services, offering solutions to every water-related environmental problem and need facing today's society. A member-driven organization, WWEMA is made up of many of the most prominent and influential companies in the industry who are working together to shape the future of water and wastewater technology in the U.S. and around the world. More information about WWEMA can be found at www.wwema.org or by contacting WWEMA Executive Director Vanessa M. Leiby at (703) 444-1777 or by email at vanessa@wwema.org.