



The ASTM A53-A specification, modified to an IIL limited fence pipe product, accomplishes this objective. Since then, our imports from IIL have been limited to galvanized fence pipe, which we have imported into the United States in limited quantities.

5. The IIL commercial fence pipe is not sold to the ASTM A53-A specification. The mill certificate states that while it is generally manufactured to the ASTM A53-A spec, it is suitable for use only as commercial fence pipe. As a result, the IIL commercial fence pipe is sold as ungraded and cannot be used in other applications that require full certification under the ASTM A53-A specification. This pipe does not meet the performance criteria required by the ASTM spec.

6. Unlike IIL, domestic manufacturers maintain strict compliance to every aspect of the ASTM A53 grade A and B specifications, including the use of a lead free zinc coating in their galvanization process. In addition, domestic producers have their own specialized quality designations and external and internal finishes that provide a great distinction in domestic quality pipe. U.S. manufacturers' circular welded pipe products are sold for use in all ASTM applications that include, in part, the transport of potable water, gas, oil, and other pressurized fluids in accord with ASTM A53-A CWP specification.

7. IIL's commercial fence pipe, in contrast, is exclusively offered by Connectors Inc. as suitable for commercial fence pipe use only. This commercial fence pipe has a number of very important differences between U.S. produced A53A pipe. IIL utilizes the hot dipped process only and the galvanization applied to their pipe is not lead free. The galvanized finish provided by the U.S. producers is universally accepted in all applications per the ASTM A53A specification. IIL's finish is limited to commercial quality fence applications. U.S. manufacturers' pipe is also subject to random hydrostatic testing to insure no liquid or gas leakage. IIL's fence pipe is not hydrostatically tested as it is sold for fence usage only.

8. U.S. manufacturers either control or remove the internal weld bead to insure smooth passage of water, gas, cables, *etc.* IIL does not remove or control the weld bead to any specific tolerance because the end use is limited to fence application only. U.S. manufacturers, unlike IIL, also offer other quality enhancements and specialized features like roll grooving, swagged ends, *etc.* IIL's fence pipe is offered to a customer base that does not have need for all the amenities offered by the domestic industry. Domestic producers have developed their own fence pipe standards, referred to as SS20, SS40 and WT-40, which have a much higher yield strength than ASTM A53-A and feature various premium coatings not offered by IIL.

9. Thank you again for the opportunity to address this hearing.