July 16, 2018

The Honorable David Johanson Chairman U.S. International Trade Commission 500 E Street, SW Washington, DC 20436

RE: Inv. No. 701-TA-584 and 731-TA-1382

Dear Chairman Johanson:

I am writing on behalf of the Communications Workers of America (CWA) to urge you to consider the impacts of anti-dumping and countervailing duty tariffs on uncoated groundwood paper from Canada on the U.S. news industry as you conduct the final phase of Investigations No. 701-TA-584 and 731-TA-1382.

The NewsGuild-CWA represents 25,000 journalists and other workers in media organizations. Our members hold a variety of jobs, including reporters, columnists, copy editors, photojournalists, graphic designers, editorial cartoonists and workers in advertising, circulation, and other departments.

Myriad jobs of CWA members and other American workers are dependent on the continued success of the American newspaper industry. Overall, newspapers employ approximately 175,000 workers across the country, representing every region and community. Unfortunately, the newspaper industry has faced significant challenges recently, most notably due to a 30 percent decline in subscriptions over the past decade that has accompanied a major shift to digital platforms. While digital platforms provide many exciting opportunities for both businesses, workers and consumers, the decline of the print industry has been very harmful to newspapers' overall revenue, which threatens tens of thousands of jobs. This decades-long shift to digital has also harmed the U.S. newsprint industry as U.S. newspapers have drastically decreased their use of newsprint.

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Given the upheaval already facing the newspaper industry, I am concerned that steep duties on imported uncoated groundwood paper from Canada could make it even harder for newspapers to succeed in the current economic environment.

I note that CWA strongly supports the use of anti-dumping and countervailing duty tariffs as a mechanism to enforce our trade laws and fight back against unfair trade. Unfair trade practices benefiting multinational corporations have cost millions of American jobs, driven down wages, and wreaked havoc across the economy. The ITC has done important work in ensuring that American workers and businesses are able to compete on a level playing field, and CWA strongly supports maintaining the ITC's ability to do its work independently. As such, the concerns that I raise to you today do not reflect concerns about the ITC's work enforcing our trade laws, but instead simply serve to urge you to consider the full impact that these duties could have across the American workforce.

Again, I urge you to fully consider the impact of duties on uncoated groundwood paper on the American newspaper industry and its workers as you move toward final determinations in these cases. Thank you in advance for your consideration.

Sincerely

Christopher M. Shelton

President

CC: The Honorable Wilbur Ross

Secretary of Commerce

United States Department of Commerce

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