



**Leo W. Gerard**  
International President

November 7, 2011

DOC Investigation Nos.:  
A-570-979 and C-570-980  
USITC Investigation Nos.:  
701-TA-481 and 731-TA-1190  
(Preliminary)

**PUBLIC DOCUMENT**

**HAND DELIVERY**

The Honorable John E. Bryson  
Secretary of Commerce  
Attn: Import Administration  
APO/Dockets Unit, Room 1870  
U.S. Department of Commerce  
14th Street and Constitution Ave., NW  
Washington, D.C. 20230

Mr. James R. Holbein  
Secretary  
U.S. International Trade Commission  
500 E Street, S.W., Room 112  
Washington, D.C. 20436

Re: *Crystalline Silicon Photovoltaic Cells, Whether or Not Assembled into Modules,  
from the People's Republic of China*

Dear Secretary Bryson and Secretary Holbein:

On behalf of the United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union ("USW"), I write in support of the antidumping and countervailing duty petitions against imports of crystalline silicon photovoltaic cells from China.

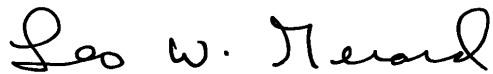
The United Steelworkers is North America's largest manufacturing union with 850,000 active members. Our members produce a broad range of products in a wide array of sectors, including in industries that supply materials to and otherwise support domestic manufacturers of crystalline silicon photovoltaic cells and modules.

USW members are all too familiar with the negative effects of unfairly traded goods; thousands of our members have suffered job loss, reduction in hours and benefits and permanent plant closures due to direct competition from foreign dumped and subsidized goods. The USW has always fought back against these unfair trading practices on behalf of its members and literally has participated in hundreds of AD and CVD cases over more than two decades.

In addition, and of particular interest, in September 2010 the USW filed a Section 301 petition to the United States Trade Representative describing in detail the various subsidy programs and discriminatory measures China has created and actively pursues to advance its clean technology industries, including solar. While we are pleased that as a result of the 301 petition USTR successfully prosecuted an illegal subsidy program at the WTO in the wind energy area, enough has not been done to counter China's deliberate and distinctly concentrated effort to develop its clean energy sector, including solar. Unfortunately, China continues to operate in a manner that is utterly inconsistent with its WTO obligations which comes at the expense of developing our nation's clean energy sector and creating and sustaining clean energy jobs for American workers.

We urge you to vigorously apply and enforce our trade laws in these solar cases so that American workers and domestic industries can have a fair chance to compete in the U.S. market.

Respectfully submitted,

A handwritten signature in black ink that reads "Leo W. Gerard". The signature is written in a cursive, flowing style.

Leo W. Gerard  
International President