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March 24, 2006

**PUBLIC INFORMATION COPY**  
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The Honorable Charles E. Grassley  
Chairman  
U.S. Senate Committee on Finance  
219 Dirksen Senate Office Building  
Washington, D.C. 20510

Re: **Miscellaneous Trade and Tariff Legislation**

Dear Chairman Grassley:

I am writing on behalf of E. I. du Pont de Nemours and Company (“DuPont”) in regard to legislation pending before the 109<sup>th</sup> Congress which, if enacted, would provide for the temporary suspension of duties for certain products. DuPont is opposed to a specific bill, S. 951, to suspend temporarily the duty on titanium dioxide anatase hombitan LC-S. Introduced April 28, 2005 by Senator Bond, the bill seeks to amend Subchapter II of Chapter 99 of the Harmonized Tariff Schedule of the United States by inserting a new heading, 9902.32.08, for titanium dioxide anatase hombitan LC-S provided for in subheading 3206.11.00, as duty free through December 31, 2008.

DuPont is a science company committed to creating sustainable solutions essential to a better, safer, healthier life for people everywhere. We offer a wide range of innovative products and services for markets including agriculture and nutrition, electronics, communication; safety and protection; home and construction; transportation and apparel.

As the world's largest producer of titanium dioxide (“TiO<sub>2</sub>”), DuPont has been making titanium-based white pigments for paper, coatings, plastics and specialty applications since 1931. Today, the company's United States’ manufacturing sites in Starke, Florida; Edge Moor, Delaware; New Johnsonville, Tennessee; DeLisle, Mississippi and corporate offices in Wilmington, Delaware employ over { } DuPont employees and { } resident contract employees.

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January 17, 2006  
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In addition to producing TiO<sub>2</sub> to meet the needs of today's consumer, DuPont remains committed to new product development. DuPont has over { } dedicated employees engaged in research and development who are actively pursuing increased product improvements and end use applications.

At present, there is sufficient capacity within the United States of TiO<sub>2</sub> to meet customers and end-user needs. In addition to DuPont, Lyondell (formerly Millennium), Kronos Worldwide and Tronox® (formerly Kerr McGee) produce TiO<sub>2</sub> domestically. With the advent of significant investment in and production of TiO<sub>2</sub> in China, increased worldwide capacity will result in increasing price pressure on TiO<sub>2</sub>. Accordingly, DuPont believes the duty suspension request outlined in S. 951, if enacted, could lead to price erosion at the expense of domestic manufacturing operations. Imports from low priced foreign producers could result in price suppression and erode average U.S. selling prices. These lower prices would make it increasingly difficult for domestic producers, like DuPont, to continue to sustain and support future investment and growth opportunities in the United States. Ultimately, decreased domestic employment could result, jeopardizing not only DuPont and resident contract employees, but the economic viability of the communities in which we operate.

DuPont remains willing to provide any additional information you may need in support of our opposition to S. 951, and is most appreciative for the opportunity to express our views.

Very truly yours,

Elaine M. Olsen

\* Deleted confidential business information is bracketed.

cc: Mr. Larry Johnson  
Inorganic Chemical Specialist  
U.S. International Trade Commission  
500 E Street, S.W.  
Room 513-D  
Washington, D.C. 20515

July 19, 2006

The Honorable Charles Grassley  
The Honorable Max Baucus  
The Senate Finance Committee  
219 Senate Dirksen Office Building  
Washington, DC 20510

RE: S. 951: To suspend temporarily the duty on titanium dioxide anatase hombitan LC-S.  
S. 3361: To suspend temporarily the duty on titanium dioxide anatase.

Dear Chairman Grassley and Ranking Member Baucus:

On behalf of the Lyondell Chemical Company, I would submit our opposition to Senate Bills, S. 951 and S. 3361.

Lyondell favors free and open trade with either the elimination of titanium dioxide tariffs to and from the United States or at least equivalent tariffs for all titanium dioxide products between countries. If enacted, S. 951 and S. 3361 would only temporarily authorize the tariff free importation of anatase TiO<sub>2</sub> products into the US with no reciprocal tariff structure for titanium dioxide products exported from the US. For these reasons Lyondell opposes the passage of these bills.

We appreciate the opportunity to comment on these bills. Thank you in advance for your consideration of our comments on this important trade matter.

Regards,



Edlu Thom  
Director, Government Affairs

bcc: John Gallagher, DuPont Titanium Technologies  
Norman Griffiths, DuPont Legal  
Connie Hubbard, DuPont Titanium Technologies  
Sharee Lawler, DuPont Government Affairs  
Helen McMahon, DuPont Legal