

January 25, 2011

The Honorable Geoff Davis U.S. House of Representatives Washington, DC 20515

Dear Representative Davis:

On behalf of the Forging Industry Association (FIA), thank you for introducing HR 10, the Regulations from the Executive In Need of Scrutiny (REINS) Act. FIA strongly endorses requiring an up-or-down vote in Congress on all major rules, defined as those with an annual economic impact of \$100 million or more, proposed by regulatory agencies.

Forging is one of the oldest known metalworking processes, where metal is pressed, pounded or squeezed under great pressure into high-strength parts known as forgings. The process is usually performed by preheating the metal to a desired temperature before it is worked. Forged parts are strong and reliable and therefore, vital in safety-critical applications. Rarely seen by consumers, forgings are normally component parts inside assemblies. For example, forgings are necessary components in the following applications:

- Automotive A single car or truck may contain 250 forgings, and 40% of all truck axle assemblies are comprised of forged components;
- Aerospace structural, engine and landing gear parts of commercial and military aircraft are forged;
- Defense a heavy tank contains over 550 separate forgings, the 120mm gun tube on the M1A2 battle tank is forged, the US Navy's Aegis Class guided missile destroyers are steered by 2 forged rudder stocks approximately 20 feet in length and weighing 35,000 pounds each, cruise missile warheads and all penetrator bomb cases are forged, and a standard artillery shell usually contains at least 2 forged components;
- **Power Generation** safe and reliable pressure vessels, generator rotors, pump shafts, valve manifolds, valve bodies, turbine blades and shafts, pipes, and fittings are forged for nuclear (commercial and naval), land, and marine power generation equipment;
- Wind Energy about 20 metric tons of forgings are used in a typical large wind turbine;
- **Oil and Gas Exploration** hundreds of forgings are used in both an oil rig tension leg platform and land-based drilling rigs;
- **Mining** forgings up to 70,000 pounds are used in surface and underground mining equipment. A forged drill bit was used to rescue the Chilean miners;
- Rail The Association of American Railroads <u>requires</u> all axles to be forged for railcars and locomotives. In locomotives, the traction gears and the engine crankshaft and camshaft are all forged;
- Medical Quality surgical tools and joint replacements require strong, light-weight forgings;
- Tools Hammers and wrenches are forged; and
- **Sports** Forged golf clubs allow more efficient transfer of energy from clubs to ball than traditional clubs that equals more distance without swinging harder.

The North American forging industry is comprised of approximately 500 forging operations in 38 states, Canada and Mexico. The modern forging process is capital intensive, and most forging plants are small businesses. Therefore, overly burdensome regulations that have not been adequately reviewed by our elected officials, but rather imposed by unelected bureaucrats, can have a devastating impact on our ability to remain globally competitive.

We look forward to advocating for HR 10 and thank you again for your commitment to common-sense regulatory reform. Please do not hesitate to contact me at 216-781-6260 or roy@forging.org; or Jennifer Baker Reid, FIA's Washington Representative, at 202-393-8524 or jreid@thelaurinbakergroup.com, if you or your staff needs any further assistance.

Sincerely,

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Executive Vice President