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Director, Corporate Quality Assurance

February 1, 2013

Justin Lasley, MCSA, MCP
Brown Metals Company
8635 White Oak Ave
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Dear Mr. Lasley:

Subject: Conflict Minerals

Thank you for your letter regarding the new "Conflict Minerals" rule (the "rule") finalized on August 22, 2012, by the Securities and Exchange Commission (the "SEC") as directed by Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the "Act"), which requires issuers of public securities to disclose their use of "conflict minerals" originating in the Democratic Republic of Congo or adjoining countries (the "DRC").

The final rule will apply to products containing any of the four conflict minerals (tin, tantalum, tungsten and gold) if the minerals are "necessary to the functionality or production" of the product or products manufactured. In a significant departure from its original proposal, the SEC ultimately determined that "intentionally adding" a mineral to the product was a measure of whether the mineral was necessary to the functionality or production of the product. We take this to mean that products containing trace elements of a conflict mineral as contaminants and impurities do not cause that product to fall under the requirements of the rule.

We followed the development of this rule closely and responded to the SEC's request for comments, raising several critical issues related to the inability to trace the origin of conflict minerals in recycled scrap. We are pleased to report that the SEC responded to our comments and recognized that it is impossible to trace the source of conflict minerals in scrap. The original proposal would have required a Conflict Minerals Report, due diligence and third-party audits for all recycled or scrap sources of conflict minerals. In the final rule, we will be required only to conduct a "reasonable inquiry" procedure to determine whether the conflict minerals come from scrap sources.

To help you comply with the rule, we are establishing a "reasonable inquiry" procedure to establish that any conflict minerals in our product originate from recycled material when in fact that is the case.

We do purchase some alloying tin and tungsten materials, and we are establishing programs that will provide methods to determine sourcing of the alloying minerals in our products and to insure that they are DRC conflict-free. In preparation for the SEC's adoption of the final rule, we conducted an initial assessment of our exposure to "conflict minerals" in our supply chain. At this time, we are not aware of the inclusion of any covered conflict minerals in our products that

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would require a finding of "not DRC conflict minerals free." We will continue working with our suppliers to assure that our products remain DRC conflict-free.

We want to assure you that, with respect to the rule's requirements for reporting on conflict minerals, our company will comply with the SEC requirements. The SEC plans to provide additional guidance in the near future, which hopefully will further clarify the law's requirements.

Thank you for the opportunity to address your concerns regarding the SEC's Conflict Minerals Rule, and most importantly for the opportunity to be your supplier. We appreciate your business and please do not hesitate to contact Elliot S. Davis, our Senior Vice President, General Counsel, Chief Compliance Officer and Corporate Secretary, with any questions or comments.

Sincerely,



Stephen J. Wolff