



July 12, 2018

To: The U.S. International Trade Commission
From: Yankee Publishing Inc., publishers of *The Old Farmer's Almanac*

As a long time user of Canadian newsprint, Yankee Publishing would like to submit our comments regarding the allegedly unfair trade practices of the Canadian newsprint industry.

We print nearly 3,000,000 copies of *The Old Farmer's Almanac* on a combination of coated paper and newsprint. We have been printed on newsprint paper from the Tembec mill in Canada for many years and none of my paper merchants have suggested any domestic mill to get our paper. That is because newsprint is generally not shipped great distances due to the high cost of delivery. **Also, there is not enough capacity in the U.S. to meet overall demand.** *The Old Farmer's Almanac* is an annual publication, now in its 227th year of continuous publication, and as such we purchase newsprint once a year and most mills are near capacity. Our relationship with Tembec is important to keeping our source of paper secure going forward.

We have been specifically using Tembec's paper because they are willing to make our newsprint to the thickness we need. We have been told that this is unique to Tembec, and most other newsprint mills do not guarantee the consistency of the thickness of the paper. We make a square-back book, so we cannot have variation in the thickness of the book. We need to have a consistent thickness of the paper over the 700,000# that we purchase. We pack a significant number of Almanacs into displays and these are designed well ahead of time for a specific thickness book. So it is important to us to have a supplier that makes newsprint to caliper, so we have stayed with Tembec and have been happy with their paper. This Canadian mill, Tembec, has been the only supplier that will make the paper we require.

This additional cost came at a terrible time for us, in particular because we print once a year. We arrange the purchase of our paper by January and we were later hit with this additional cost at a time that we had no ability to increase our cover price or ad prices or significantly change our orders. To offset costs we did decrease the page count by 16 pages. We did this because our newsprint paper alone had increased by over 36% in one year. **That is \$68,000 to we had no chance of recovering.**

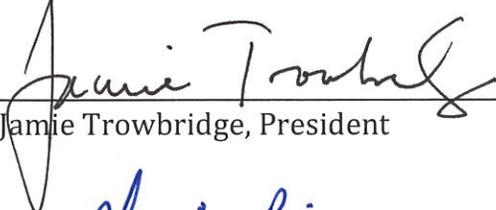
In talking with our merchants and listening and reading industry news, it is clear that the extra costs being added to newsprint is unfair not only to the Canadian

mills, but to printers, publishers, and, in the end, the consumers. The mill that brought the suit is not owned by vested paper people, but by an equity group that wants nothing but fast returns. They are not concerned with the overall health of the paper industry in Canada or the mills and publishers in the U.S. for that matter.

Yankee Publishing is not a big company. Being unable to secure our materials at the best price is terribly unfair—unfair to us and to all the other users of newsprint and the consumers.

Thank you for the opportunity to submit our comments.

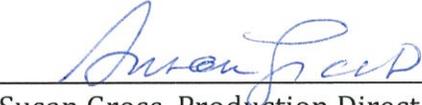
Sincerely,



Jamie Trowbridge, President



Sherin Pierce, Vice President and Publisher of *The Old Farmer's Almanac*



Susan Gross, Production Director of *The Old Farmer's Almanac*