

Privacy Act Statement. Every registration statement, short form registration statement, supplemental statement, exhibit, amendment, dissemination report, copy of political propaganda or other document or information filed with the Attorney General under this act is a public record open to public examination, inspection and copying during the posted business hours of the Registration Unit in Washington, D.C. One copy is automatically provided to the Secretary of State pursuant to Section 6(b) of the Act, and copies of such documents are routinely made available to other agencies, departments and Congress pursuant to Section 6(c) of the Act. Finally, the Attorney General transmits an annual report to the Congress on the Administration of the Act which lists the names of all agents and the nature, sources and content of the political propaganda disseminated or distributed by them. This report is available to the public.

Public Reporting Burden. Public reporting burden for this collection of information is estimated to average .49 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to Chief, Registration Unit, Criminal Division, U.S. Department of Justice, Washington, D.C. 20530; and to the Office of Information and Regulatory Affairs, Office of Management and Budget, Washington, D.C. 20503.

Furnish this exhibit for EACH foreign principal listed in an initial statement and for EACH additional foreign principal acquired subsequently.

|   |                             |
|---|-----------------------------|
| 1. Name and address of registrant<br>Hogan & Hartson L.L.P. | 2. Registration No.<br>2244 |
|---|-----------------------------|

|   |  |
|---|--|
| 3. Name of foreign principal<br>Algoma Steel Inc. | 4. Principal address of foreign principal<br>P.O. Box 1400<br>Sault Ste Marie<br>Ontario, Canada P6A 5P2 |
|---|--|

5. Indicate whether your foreign principal is one of the following type:

Foreign government

Foreign political party

Foreign or  domestic organization: If either, check one of the following:

|   |  |
|---|--|
| <input type="checkbox"/> Partnership            | <input type="checkbox"/> Committee             |
| <input checked="" type="checkbox"/> Corporation | <input type="checkbox"/> Voluntary group       |
| <input type="checkbox"/> Association            | <input type="checkbox"/> Other (specify) _____ |

Individual—State his nationality \_\_\_\_\_

6. If the foreign principal is a foreign government, state:

a) Branch or agency represented by the registrant. N/A

b) Name and title of official with whom registrant deals.

7. If the foreign principal is a foreign political party, state:

a) Principal address N/A

b) Name and title of official with whom registrant deals.

c) Principal aim

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8. If the foreign principal is not a foreign government or a foreign political party,

a) State the nature of the business or activity of this foreign principal

Manufacture and sale of steel

b) Is this foreign principal

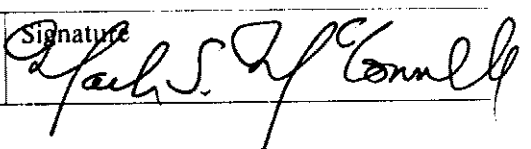
- Owned by a foreign government, foreign political party, or other foreign principal ..... Yes  No
- Directed by a foreign government, foreign political party, or other foreign principal..... Yes  No
- Controlled by a foreign government, foreign political party, or other foreign principal ..... Yes  No
- Financed by a foreign government, foreign political party, or other foreign principal... See item 9.... Yes  No
- Subsidized in whole by a foreign government, foreign political party, or other foreign principal..... Yes  No
- Subsidized in part by a foreign government, foreign political party, or other foreign principal..... Yes  No

9. Explain fully all items answered "Yes" in Item 8(b). (If additional space is needed, a full insert page may be used.)

To the extent that such an arrangement is considered financing by a government, the Government of the Province of Ontario has provided Algoma Steel Inc. a loan guarantee facility of up to \$110 million. The Corporation pays commercial rates for the guarantee facility.

10. If the foreign principal is an organization and is not owned or controlled by a foreign government, foreign political party or other foreign principal, state who owns and controls it.

About 57% of the Corporation's common shares are held by Trusts for the benefit of the Company's employees. The remaining shares are held by the public at large with no other entity holding more than 10%.

|                                   |  |  |
|-----------------------------------|--|--|
| Date of Exhibit A<br>May 23, 1994 | Name and Title<br>Mark S. McConnell<br>Partner | Signature<br> |
|-----------------------------------|--|--|

**INSTRUCTIONS:** A registrant must furnish as an Exhibit B copies of each written agreement and the terms and conditions of each oral agreement with his foreign principal, including all modifications of such agreements; or, where no contract exists, a full statement of all the circumstances by reason of which the registrant is acting as an agent of a foreign principal. This form shall be filed in triplicate for each foreign principal named in the registration statement and must be signed by or on behalf of the registrant.

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| Name of Registrant     | Name of Foreign Principal |
|------------------------|---------------------------|
| Hogan & Hartson L.L.P. | Algoma Steel Inc.         |

Check Appropriate Boxes:

1.  The agreement between the registrant and the above-named foreign principal is a formal written contract. If this box is checked, attach three copies of the contract to this exhibit.
2.  There is no formal written contract between the registrant and foreign principal. The agreement with the above-named foreign principal has resulted from an exchange of correspondence. If this box is checked, attach three copies of all pertinent correspondence, including a copy of any initial proposal which has been adopted by reference in such correspondence.
3.  The agreement or understanding between the registrant and the foreign principal is the result of neither a formal written contract nor an exchange of correspondence between the parties. If this box is checked, give a complete description below of the terms and conditions of the oral agreement or understanding, its duration, the fees and the expenses, if any, to be received.

The attached letter agreement relates to legal representation of Algoma Steel Inc. in litigation that is eligible for the attorney's exemption. The parties have subsequently agreed orally that the firm will engage in certain activities as described in Item 6 below on the same terms as set forth in the letter agreement.

Confidential information related to other clients for which registration is not required has been redacted from the letter.

4. Describe fully the nature and method of performance of the above indicated agreement or understanding.

See Item 5 below

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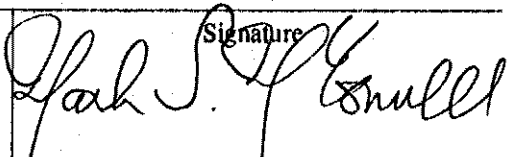
5. Describe fully the activities the registrant engages in or proposes to engage in on behalf of the above foreign principal.

Provide advice and representation with respect to trade policy, laws and regulations as they affect the foreign principal's business operations, with particular focus on imports of steel into the United States.

6. Will the activities on behalf of the above foreign principal include political activities as defined in Section 1(o) of the Act?<sup>1</sup>  
Yes  No

If yes, describe all such political activities indicating, among other things, the relations, interests or policies to be influenced together with the means to be employed to achieve this purpose.

From time to time, the firm may communicate or assist the foreign principal in its communications with U.S. Government officials and the public regarding legislation and administrative or policy actions that affect the current and future interests of the foreign principal.

|  |  |  |
|--|--|--|
| <p>Date of Exhibit B</p> <p>May 23, 1994</p> | <p>Name and Title</p> <p>Mark S. McConnell<br/>Partner</p> | <p>Signature</p>  |
|--|--|--|

<sup>1</sup>Political activity as defined in Section 1(o) of the Act means the dissemination of political propaganda and any other activity which the person engaging therein believes will, or which he intends to, prevail upon, indoctrinate, convert, induce, persuade, or in any other way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting, or changing the domestic or foreign policies of the United States or with reference to the political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

# HOGAN & HARTSON

*Algoma  
Steel*

COLUMBIA SQUARE  
555 THIRTEENTH STREET NW  
WASHINGTON DC 20004-1109  
(202) 637-5600

MARK S. McCONNELL  
PARTNER  
DIRECT DIAL (202) 637-3796

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LONDON  
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PRAGUE  
WARSAW  
BALTIMORE, MD  
BETHESDA, MD  
McLEAN, VA

July 27, 1992

Mr. Paul C. Finley  
Assistant to the Vice President  
Human Resources  
Algoma Steel Inc.  
P.O. Box 1400  
Sault Ste. Marie, Ontario P6A 5P2  
Canada

Dear Mr. Finley:

I am very pleased that Algoma Steel Inc. has engaged Hogan & Hartson to represent the company in the antidumping investigations of Certain Hot Rolled Carbon Steel Flat Products from Canada, Colled Rolled Carbon Steel Flat Products from Canada, and Cut-to-Length Carbon Steel Plate from Canada. Under the District of Columbia Rules of Professional Conduct, we are required to reduce the terms of our understanding to writing. This letter sets forth the terms upon which we will provide professional services to Algoma Steel Inc.

I will have primary billing responsibility for this matter. We will provide our services on an hourly basis at our standard rates for attorneys' and consultants' time, which are periodically revised. The current rates are for Lewis Leibowitz \$275, T. Weymouth \$180, Lynn Kamarck \$180, Leslie Delagran \$135, Beth Peters \$110 and Tim Mellett \$120. My time is billed at \$225 per hour. Additional assistance will be provided, where appropriate, by associates with billing rates that currently range from \$100 to 185, and by legal assistants with billing rates that currently range from \$50 to \$95.

We will bill you monthly for legal services and other charges. Payment in full is requested within 30 days of your receipt of our statement. We will waive our standard practice and not require an advance retainer. We reserve the right, however, to require a retainer in the future if payments are not timely or in other appropriate circumstances.

HOGAN & HARTSON

Mr. Paul C. Finley  
July 27, 1992  
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Under the D.C. Bar Rules there is a very broad definition of conflicts of interest, one that is much broader than that in the ABA Model Rules. We accordingly have established the practice of seeking advance waiver of certain conflicts that are not direct. The following paragraphs are designed for that purpose. I would be happy to discuss them with you if you have any questions.

Hogan & Hartson represents, and in the future will represent, other clients that are or may be involved in transactions or have other contacts with Algoma Steel Inc. and/or its affiliates. We understand that Algoma Steel Inc. consents to the firm's continued and future representation of such other clients without the need for any further consents from Algoma Steel Inc. when either there is no direct conflict, (such as where there is no direct relationship between such representation of other clients and the matters the firm is handling for Algoma Steel Inc.), or where matters the firm is handling for either Algoma Steel Inc. or other clients involve legislative or policy issues or administrative proceedings unrelated to the representation of the other client.

This will confirm our understanding that Algoma Steel Inc. is our client for specific matters on which it engages us, and we shall not be deemed to represent its affiliated corporations unless Algoma Steel Inc. advises us that such entities are directly involved in or affected by our representation of Algoma Steel Inc.

This letter also confirms our understanding that Algoma Steel Inc. consents to our representation of

and that Algoma Steel Inc. consents to our continued representation of

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Mr. Paul C. Finley  
July 27, 1992  
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If this correctly reflects our understanding, please sign, date, and return to me the enclosed copy of this letter. If you have any questions regarding any aspects of our representation, please call me.

Again, I am pleased that you have asked us to handle this matter. I look forward to working with you.

Sincerely,

  
Mark S. McConnell

Algoma Steel Inc.

By PC Finley  
Paul C. Finley, Assistant to the Vice President

Date Aug. 18th, 1992

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