

Ма

the Exchange Notes in its ordinary course of business and has no arrangement or understanding to participate in the distribution of the Exchange Notes to be received in the Exchange Offer.

- 2. The Registrants will make each participant in the Exchange Offer aware (through the Exchange Offer prospectus or otherwise) that if such person is using the Exchange Offer to participate in the distribution of the Exchange Notes to be acquired in the Exchange Offer, such person (a) cannot rely on the Commission staff's position enunciated in or similar letters and (b) must comply with the registration and prospectus delivery requirements of the Securities Act in connection with a secondary resale transaction. The Registrants acknowledge that such a secondary resale transaction should be covered by an effective registration statement containing the selling security holder information required by Item 507 of Regulation S-K promulgated under the Securities Act.
- 3. The Registrants will make each participant in the Exchange Offer aware (through the Exchange Offer prospectus or otherwise) that (a) by executing the letter of transmittal or similar documentation, any such broker-dealer represents that it will deliver a prospectus meeting the requirements of the Securities Act in connection with any resale of Exchange Notes received in respect of such existing securities pursuant to the Exchange Offer and (b) any such broker-dealer must confirm that it has not entered into any arrangement or understanding with the Registrants or an affiliate of the Registrants to distribute Exchange Notes. The Registrants will include in the letter of transmittal or similar documentation a statement to the effect that by so acknowledging and by delivering a prospectus, a broker-dealer will not be deemed to admit that it is an "underwriter" within the meaning of the Securities Act.

The Registrants will include, in the transmittal letter or similar documentation to be executed by the exchange offeree in order to participate in the Exchange Offer, representations to the effect that (a) the exchange offeree is acquiring the Exchange Notes in its ordinary course of business, (b) by accepting the Exchange Offer, the exchange offeree represents that it is not engaged in, does not intend to engage in and has no arrangement or understanding with any person to participate in a distribution of the Exchange Notes and (c) the offeree is not an "affiliate" of the Registrants within the meaning of Rule 405 under the Securities Act.

Very truly yours,

CLEVELAND-CLIFFS INC.
CLEVELAND-CLIFFS STEEL LLC
CLIFFS MINING COMPANY
METALLICS SALES COMPANY
NORTHSHORE MINING COMPANY
THE CLEVELAND-CLIFFS IRON COMPANY
TILDEN MINING COMPANY L.C.
By: The Cleveland-Cliffs Iron Company, as its manager

By: /s/ James D. Graham

Name: James D. Graham

Title: Executive Vice President, Chief Legal Officer & Secretary

CANNON AUTOMOTIVE SOLUTIONS – BOWLING GREEN, INC. CLEVELAND-CLIFFS STEEL HOLDINGS INC. CLEVELAND-CLIFFS STEEL HOLDINGS INC. CLEVELAND-CLIFFS STEEL MANAGEMENT INC. CLEVELAND-CLIFFS STEEL PROPERTIES INC. CLEVELAND-CLIFFS TUBULAR COMPONENTS LLC CLIFFS MINNESOTA MINING COMPANY CLIFFS TIOP, INC. CLIFFS TIOP, INC. CLIFFS UTAC HOLDING LLC FLEETWOOD METAL INDUSTRIES, LLC IRONUNITS LLC LAKE SUPERIOR & ISHPEMING RAILROAD COMPANY MID-VOL COAL SALES, INC. MOUNTAIN STATE CARBON, LLC PRECISION PARTNERS HOLDING COMPANY SILVER BAY POWER COMPANY SILVER BAY POWER COMPANY SNA CARBON, LLC UNITED TACONITE LLC

By: /s/ James D. Graham

Name: James D. Graham

Title: Secretary

CLEVELAND-CLIFFS STEEL COAS STOEELIC 3/22/24-KSL its mana 1/2/24-KSL/James D./ame: Jame D. G D