

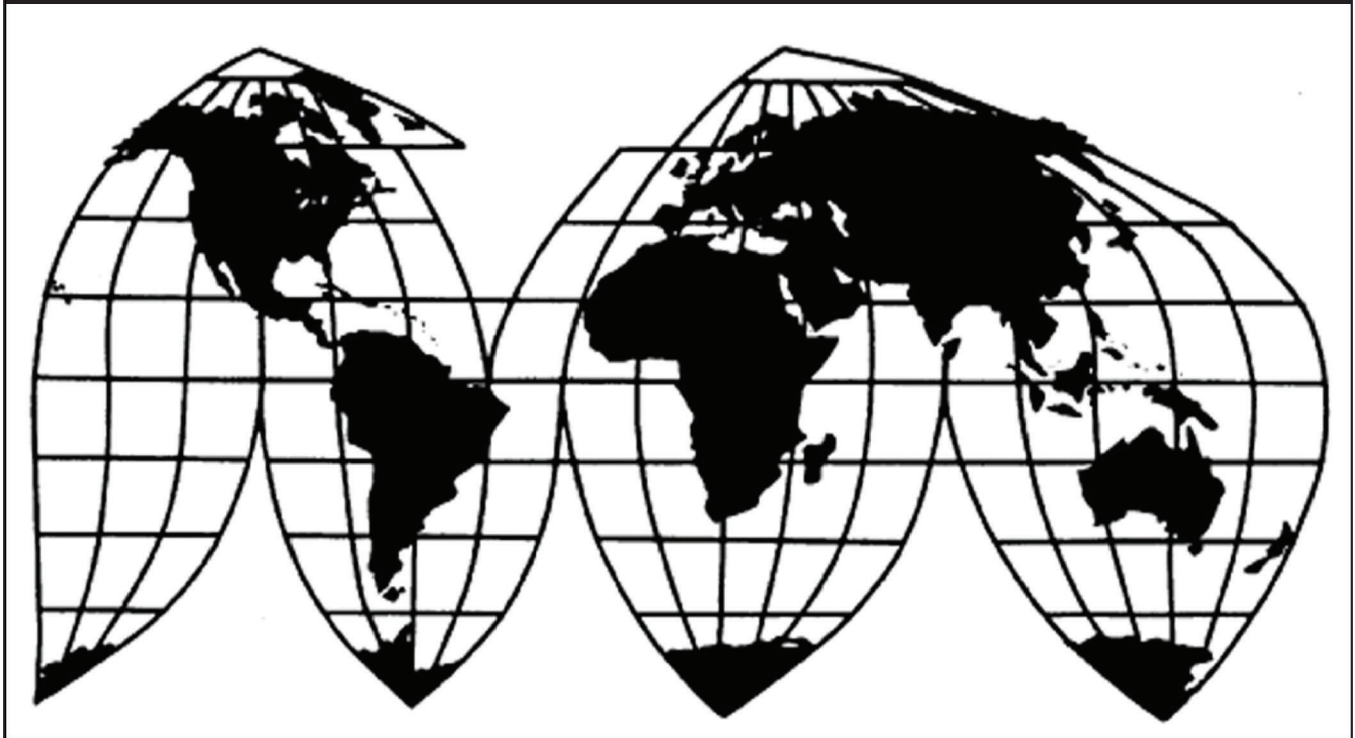
Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, South Korea, and Switzerland

Investigation Nos. 701-TA-576-577 and 731-TA-1362-1367 (Review)

Publication 5487

February 2024

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets in confidential reports and is deleted and replaced with asterisks (***) in public reports.

UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-576-577 and 731-TA-1362-1367 (Review)

Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, South Korea, and Switzerland

DETERMINATIONS

On the basis of the record¹ developed in the subject five-year reviews, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the countervailing duty orders on certain cold-drawn mechanical tubing of carbon and alloy steel (“cold-drawn mechanical tubing”) from China and India and the antidumping duty orders on cold-drawn mechanical tubing from China, Germany, India, Italy, South Korea, and Switzerland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

BACKGROUND

The Commission instituted these reviews on January 3, 2023 (88 FR 114) and determined on April 10, 2023 that it would conduct a full review (88 FR 24442, April 20, 2023). Notice of the scheduling of the Commission’s reviews and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on July 13, 2023 (88 FR 44841). The Commission conducted its hearing on November 28, 2023. All persons who requested the opportunity were permitted to participate.

¹ The record is defined in § 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

Views of the Commission

Based on the record in these five-year reviews, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the countervailing duty orders on certain cold-drawn mechanical tubing of carbon and alloy steel (“CDMT”) from China and India and the antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

I. Background

On April 19, 2017, ArcelorMittal Tubular Products (“ArcelorMittal”); Michigan Seamless Tube, LLC (“Michigan Seamless”); PTC Alliance LLC (“PTC”); Webco Industries, Inc. (“Webco”); and Zekelman Industries, Inc., Sharon Tube Division (“Zekelman”) (collectively, “Domestic Producers”), domestic producers of CDMT, filed countervailing duty petitions on CDMT from China and India and antidumping duty petitions on CDMT from China, Germany, India, Italy, South Korea, and Switzerland.¹ In January 2018, the Commission determined that a domestic industry was materially injured by reason of imports of CDMT that were determined by the U.S. Department of Commerce (“Commerce”) to be subsidized by the governments of China and India.² Commerce subsequently published countervailing duty orders on CDMT from China and India on February 1, 2018.³ In May 2018, the Commission determined that a domestic industry was materially injured by reason of imports of CDMT from China, Germany, India, Italy, South Korea, and Switzerland determined by Commerce to be sold at LTFV.⁴ Commerce subsequently

¹ *Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, South Korea, and Switzerland*, Inv. Nos. 701-TA-576-577 and 731-TA-1362-1367 (Review), USITC Pub. 5487, (Feb. 2024) (“PR”); Confidential Report, Memorandum INV-VV-109, December 20, 2023 (“CR”) (together, “CR/PR”) at I-2.

² *Cold-Drawn Mechanical Tubing from China and India*, Inv. Nos. 701-TA-576-577 (Final), USITC Pub. 4755 (Jan. 2018) (“*Original Determinations*”). Although the petitions concerning CDMT from China, Germany, India, Italy, South Korea, and Switzerland were filed on the same day, the investigation schedules became “staggered” when Commerce issued its countervailing duty determinations for China and India earlier than its less-than-fair-value (“LTFV”) determinations for China, Germany, India, Italy, South Korea, and Switzerland. *Id.*

³ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China and India: Countervailing Duty Orders*, 83 Fed. Reg. 4637 (Feb. 1, 2018).

⁴ *Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland*, Inv. Nos. 731-TA-1362-1367 (Final), USITC Pub. 4790 (May 2018). In December 2021, the Court of (Continued...)

published antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland on June 11, 2018.⁵

Current Reviews. On January 3, 2023, the Commission instituted the current first five-year reviews of the countervailing duty orders on subject imports of CDMT from China and India and the antidumping duty orders on subject imports of CDMT from China, Germany, India, Italy, South Korea, and Switzerland.⁶ The Commission received a joint response to its notice of institution from Domestic Producers.⁷ It also received three responses from respondent interested parties with respect to the antidumping duty order on CDMT from Italy: one filed jointly on behalf of Italian CDMT producer, Dalmine S.p.A. (“Dalmine”), and U.S. importer of CDMT from Italy, Tenaris Global Services (U.S.A.) Corporation (“Tenaris”);⁸ one filed on behalf of Italian CDMT producer Marcegaglia Carbon Steel S.p.A. (“Marcegaglia”); and one filed on behalf of Italian CDMT producer Metalfer, S.p.A. (“Metalfer”).⁹ The Commission did not receive a response from any respondent interested parties with respect to China, Germany, India,

International Trade (“CIT”) affirmed the Commission’s affirmative determination, upholding the Commission’s definition of the domestic like product and its decision not to define airbag tubing as a separate domestic like product. *Autoliv Asp, Inc. v. United States*, 422 F. Supp. 3d 1295 (Ct. Int’l Trade 2019) at 1308.

⁵ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People’s Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland: Antidumping Duty Orders; and Amended Final Determinations of Sales at Less Than Fair Value for the People’s Republic of China and Switzerland*, 83 Fed. Reg. 26962 (June 11, 2018). Commerce initially granted Goodluck Industries/Goodluck India Ltd. (“Goodluck”) a dumping margin of 33.8 percent, but following a remand order from the CIT, Commerce granted Goodluck a zero/*de minimis* dumping margin on December 23, 2019 and therefore excluded Goodluck from the order. The U.S. Court of Appeals for the Federal Circuit (“CAFC”) subsequently reversed and remanded the CIT’s decision and on November 17, 2021, the CIT issued a final judgment vacating its original opinion and sustaining Commerce’s original final determination. *Goodluck India Ltd. v. United States*, 439 F. Supp. 3d 1366, 1370 (Ct. Int’l Trade 2020), *rev’d and remanded*, 11 F.4th 1335, 1344 (Fed. Cir. 2021). Commerce subsequently reinstated the order and its dumping margin of 33.8 percent with respect to Goodluck effective September 10, 2021. *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India: Notice of Second Amended Final Determination; Notice of Amended Order; Notice of Resumption of First and Reinitiation of Second Antidumping Duty Administrative Reviews; Notice of Opportunity for Withdrawal; and Notice of Assessment in Third Antidumping Duty Administrative Review*, 86 Fed Reg. 74069 (Dec. 29, 2021) (“*Goodluck Second Remand Order*”).

⁶ *Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, South Korea, and Switzerland; Institution of Five-Year Reviews*, 88 Fed. Reg. 114 (Jan. 3, 2023) (“*Notice of Institution*”).

⁷ Domestic Producers’ Response to Notice of Institution, EDIS Doc. 789251 (Feb. 2, 2023).

⁸ Dalmine and Tenaris’s Response to Notice of Institution, EDIS Doc. 789320 (Feb. 2, 2023).

⁹ Metalfer Response to Notice of Institution, EDIS Doc. 789309 (Feb. 2, 2023) (“*Metalfer’s Response to Notice of Institution*”); Marcegaglia Response to Notice of Institution, EDIS Doc. 789319 (Feb. 2, 2023).

South Korea, or Switzerland. On April 10, 2023, the Commission found that the domestic interested party group response was adequate and that the respondent interested party group response with respect to Italy was adequate. It therefore determined to conduct a full review of the order on CDMT from Italy. Although the Commission found that the respondent interested party group responses with respect to China, Germany, India, South Korea, and Switzerland were inadequate, the Commission nevertheless determined to conduct full reviews of the orders on CDMT from China, Germany, India, South Korea, and Switzerland to promote administrative efficiency in light of its decision to conduct a full review with respect to the order on CDMT from Italy.¹⁰

The Commission received prehearing and posthearing briefs and final comments jointly filed on behalf of Domestic Producers.¹¹ Representatives of Domestic Producers appeared at the Commission's hearing accompanied by counsel.

Several respondent interested parties also participated in these reviews. The Commission received a joint prehearing brief on behalf of Marcegaglia, Dalmine, and Tenaris (collectively, "Italian Respondents").¹² Representatives of Italian Respondents appeared at the Commission's hearing accompanied by counsel.¹³ Metalfer joined Italian Respondents in filing a joint posthearing brief and final comments.¹⁴

Data/Response Coverage. U.S. industry data are based on the questionnaire responses of six U.S. producers of CDMT that are believed to have accounted for over 90 percent of

¹⁰ *Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, South Korea, and Switzerland; Notice of Commission Determination To Conduct Full Five-Year Reviews*, 88 Fed Reg. 24442 (Apr. 20, 2023).

¹¹ Domestic Industry's Prehearing Brief, EDIS Doc. 808986, (Nov. 20, 2023) ("Domestic Producers' Prehear. Br."); Domestic Industry's Posthearing Brief, EDIS Doc. 810146, (Dec. 5, 2023) ("Domestic Producers' Posthear. Br."); Domestic Industry's Final Comments, EDIS Doc. 811770, (Jan. 10, 2024).

¹² Prehearing Brief Dalmine S.p.A., Marcegaglia Carbon Steel S.p.A., and Tenaris Global Services (U.S.A.), EDIS Doc. 808987 (Nov. 20, 2023) ("Respondents' Prehear. Br."). Dalmine is a wholly-owned subsidiary of Tenaris. CR/PR at IV-72 n.25.

¹³ No submissions were received on behalf of any producer/exporter of CDMT from the remaining countries or from any U.S. importer of CDMT from the remaining countries.

¹⁴ Posthearing Brief Dalmine S.p.A., Marcegaglia Carbon Steel S.p.A., Metalfer, S.p.A., and Tenaris Global Services (U.S.A.), EDIS Doc. 809881 (Dec. 5, 2023) ("Respondents' Posthear. Br."); Final Comments Dalmine S.p.A., Marcegaglia Carbon Steel S.p.A., Metalfer, S.p.A., and Tenaris Global Services (U.S.A.), EDIS Doc. 811772 (Jan. 10, 2024). While Metalfer responded to the Commission's notice of institution, it did not submit prehearing briefs or participate in the hearing. Subsequently, it submitted a joint posthearing brief along with Italian Respondents in which it responded to the Commission's questions presented to parties during the hearing as well as final comments. *Id.*

domestic production of CDMT in 2022.¹⁵ U.S. import data and related information are based on the questionnaire responses of U.S. importers, and are supplemented with proprietary Census-edited Customs records.¹⁶ The Commission received questionnaire responses from 25 U.S. importers representing *** percent of total imports and *** percent of subject imports in 2022.¹⁷ Firms responding to the Commission’s importer questionnaire accounted for *** percent of subject imports from China, *** percent of subject imports from Germany, *** percent of subject imports from India, *** percent of subject imports from Italy, *** percent of subject imports from South Korea, and *** percent of subject imports from Switzerland.¹⁸ The Commission received questionnaire responses from three producers and exporters of CDMT in Germany, which accounted for *** of known CDMT production in Germany 2022;¹⁹ three producers and exporters of CDMT in India, which accounted for *** of known CDMT production in India in 2022;²⁰ five producers and/or exporters of CDMT in Italy, which accounted for *** percent of known CDMT production in Italy in 2022;²¹ and two producers and exporters of CDMT in Switzerland, one of which only provided data from 2017 through April 2021 and the other producer accounted for *** of known CDMT production in Switzerland in 2022;²² as well as information from the original investigations, information submitted by Domestic Producers, and information gathered by Commission staff such as industry research

¹⁵ CR/PR at I-11, I-38.

¹⁶ CR/PR at I-40, IV-1, Table I-20. Consistent with the original investigations, import data are based on importer questionnaire responses as well as proprietary Census-edited Customs records for imports under the primary U.S. Harmonized Tariff Schedule (“HTSUS”) statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 which are used for those firms that did not provide a questionnaire response. Proprietary Customs data for importers that indicated in the Commission’s questionnaires that they did not import CDMT during the 2017 through June 2023 period of review (“POR”) were not included in the data set. CR/PR at Table I-20.

Import data presented in the sections examining geographical markets and presence in the market are based on official Commerce statistics for HTSUS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, which include CDMT and out-of-scope products. CR/PR at I-40, IV-1, IV-18, IV-20.

¹⁷ CR/PR at I-40, IV-1, Table I-20.

¹⁸ CR/PR at I-40, IV-1, Table I-20.

¹⁹ CR/PR at IV-41.

²⁰ CR/PR at IV-57.

²¹ CR/PR at IV-72.

²² CR/PR at IV-101.

data and public export data.²³ Additionally, the Commission received 23 usable questionnaire responses from U.S. purchasers of CDMT during the POR.²⁴

II. Domestic Like Product and Industry

A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”²⁵ The Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation under this subtitle.”²⁶ The Commission’s practice in five-year reviews is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.²⁷

Commerce has defined the imported merchandise within the scope of the countervailing and antidumping duty orders under review as follows:

{C}old-drawn mechanical tubing of carbon and alloy steel (cold-drawn mechanical tubing) of circular cross-section, 304.8 mm or more in length, in actual outside diameters less than 331 mm, and regardless of wall thickness, surface finish, end finish or industry specification. The subject cold-drawn mechanical tubing is a tubular product with a circular cross-sectional shape that has been cold-drawn or otherwise cold-finished after the initial tube formation in a manner that involves a change in the diameter or wall thickness of the tubing, or both. The subject cold-drawn mechanical tubing may be produced from either welded (*e.g.*, electric resistance welded, continuous welded, *etc.*) or seamless (*e.g.*, pierced, pilgered or extruded, *etc.*) carbon or alloy steel tubular products. It may also be heat treated after cold working.

²³ No subject producers in China provided full responses to the Commission’s questionnaires. CR/PR at IV-33.

²⁴ CR/PR at I-43.

²⁵ 19 U.S.C. § 1677(4)(A).

²⁶ 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96th Cong., 1st Sess. 90-91 (1979).

²⁷ *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

Such heat treatments may include, but are not limited to, annealing, normalizing, quenching and tempering, stress relieving or finish annealing. Typical cold-drawing methods for subject merchandise include, but are not limited to, drawing over mandrel, rod drawing, plug drawing, sink drawing and similar processes that involve reducing the outside diameter of the tubing with a die or similar device, whether or not controlling the inside diameter of the tubing with an internal support device such as a mandrel, rod, plug or similar device. Other cold-finishing operations that may be used to produce subject merchandise include cold-rolling and cold-sizing the tubing.

Subject cold-drawn mechanical tubing is typically certified to meet industry specifications for cold-drawn tubing including but not limited to:

- (1) American Society for Testing and Materials (ASTM) or American Society of Mechanical Engineers (ASME) specifications ASTM A-512, ASTM A-513 Type 3 (ASME SA513 Type 3), ASTM A-513 Type 4 (ASME SA513 Type 4), ASTM A-513 Type 5 (ASME SA513 Type 5), ASTM A-513 Type 6 (ASME SA513 Type 6), ASTM A-519 (cold-finished);
- (2) SAE International (Society of Automotive Engineers) specifications SAE J524, SAE J525, SAE J2833, SAE J2614, SAE J2467, SAE J2435, SAE J2613;
- (3) Aerospace Material Specification (AMS) AMS T-6736 (AMS 6736), AMS 6371, AMS 5050, AMS 5075, AMS 5062, AMS 6360, AMS 6361, AMS 6362, AMS 6371, AMS 6372, AMS 6374, AMS 6381, AMS 6415;
- (4) United States Military Standards (MIL) MIL-T-5066 and MIL-T-6736;
- (5) foreign standards equivalent to one of the previously listed ASTM, ASME, SAE, AMS or MIL specifications including but not limited to:
 - (a) German Institute for Standardization (DIN) specifications DIN 2391-2, DIN 2393-2, DIN 2394-2);
 - (b) European Standards (EN) EN 10305-1, EN 10305-2, EN 10305-4, EN 10305-6 and European national variations on those standards (e.g., British Standard (BS EN), Irish Standard (IS EN) and German Standard (DIN EN) variations, etc.);
 - (c) Japanese Industrial Standard (JIS) JIS G 3441 and JIS G 3445; and
- (6) proprietary standards that are based on one of the above-listed standards.

The subject cold-drawn mechanical tubing may also be dual or multiple certified to more than one standard. Pipe that is multiple certified as cold-

drawn mechanical tubing and to other specifications not covered by this scope, is also covered by the scope of these orders when it meets the physical description set forth above.

Steel products included in the scope of these orders are products in which: (1) Iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

For purposes of this scope, the place of cold-drawing determines the country of origin of the subject merchandise. Subject merchandise that is subject to minor working in a third country that occurs after drawing in one of the subject countries including, but not limited to, heat treatment, cutting to length, straightening, nondestructive testing, deburring or chamfering, remains within the scope of these orders.

All products that meet the written physical description are within the scope of these orders unless specifically excluded or covered by the scope of an existing order. Merchandise that meets the physical description of cold-drawn mechanical tubing above is within the scope of the orders even if it is also dual or multiple certified to an otherwise excluded specification listed below. The following products are outside of, and/or specifically excluded from, the scope of these orders:

(1) Cold-drawn stainless steel tubing, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight;

(2) products certified to one or more of the ASTM, ASME or American Petroleum Institute (API) specifications listed below:

- ASTM A-53;
- ASTM A-106;
- ASTM A-179 (ASME SA 179);
- ASTM A-192 (ASME SA 192);
- ASTM A-209 (ASME SA 209);
- ASTM A-210 (ASME SA 210);
- ASTM A-213 (ASME SA 213);
- ASTM A-334 (ASME SA 334);
- ASTM A-423 (ASME SA 423);
- ASTM A-498;
- ASTM A-496 (ASME SA 496);
- ASTM A-199;
- ASTM A-500;
- ASTM A-556;
- ASTM A-565;
- API 5L; and

- API 5CT

except that any cold-drawn tubing product certified to one of the above excluded specifications will not be excluded from the scope if it is also dual- or multiple-certified to any other specification that otherwise would fall within the scope of these orders.²⁸

CDMT are steel tubular products with a circular cross-section shape that have been cold-drawn or otherwise cold-finished in a manner that changes the product's diameter, wall thickness, or both.²⁹ Cold-drawing, or similar cold-finishing activities, impart CDMT with distinct physical characteristics, including size and dimensional tolerance, higher yield strength, tensile strength, elongation, and a high weight to strength ratio.³⁰ The characteristics imparted by cold-drawing or cold-finishing make CDMT suitable for a variety of applications, including mechanical parts in automobiles, trucks, aircraft, construction, agricultural and drilling equipment, and hydraulic cylinders.³¹ CDMT may be produced in a variety of outside diameter and wall thickness combinations that meet particular customer specifications and end-use needs.³²

1. The Original Investigations

The Commission considered whether the domestic like product should include as-welded tubes insofar as the parties disagreed as to what degree of cold-sizing would bring

²⁸ *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland: Final Results of the Expedited First Sunset Review of the Antidumping Duty Orders*, 88 Fed. Reg 16587 (Mar. 20, 2023); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg 24386 (Apr. 20, 2023) and accompanying *Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India* (Apr. 14, 2023); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg. 16587 (Mar. 20, 2023), and accompanying *Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China* (Mar. 24, 2023). The scope is substantively the same as the scope in the original investigations.

²⁹ CR/PR at I-31.

³⁰ CR/PR at I-31.

³¹ CR/PR at I-31.

³² CR/PR at I-31.

tubes within the scope.³³ The Commission found it inappropriate to include as-welded tubes within the definition of the domestic like product.³⁴ It also declined to define two products not produced in the United States, airbag tubing and CDMT certified to 2014/68/EU-Pressure Equipment Directive used in the manufacture of high-pressure nitrogen gas spring products, as separate domestic like products because parties failed to identify domestically produced variants that were most similar in characteristics and uses to these two products.³⁵ Accordingly, the Commission defined a single domestic like product consisting of CDMT, coextensive with the scope of the investigations.³⁶

2. The Current Reviews

In the current reviews, Domestic Producers argue that the Commission should define a single domestic like product, coextensive with the scope of the reviews, as it did in the original investigations.³⁷ Italian Respondents have not argued for a different definition of the domestic like product and did not request that the Commission collect data concerning other possible domestic like products.³⁸ There is no new information on the record indicating that the pertinent characteristics and uses of CDMT have changed since the prior proceedings so as to warrant the Commission's reconsideration of the domestic like product definition.³⁹ We therefore again define the domestic like product as consisting of CDMT, coextensive with Commerce's scope.

B. Domestic Industry and Related Parties

Section 771(4)(A) of the Tariff Act defines the relevant industry as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."⁴⁰ In defining the domestic industry, the Commission's general practice has been

³³ *Original Determinations*, USITC Pub. 4755 at 11-13.

³⁴ *Original Determinations*, USITC Pub. 4755 at 12-13, 12 n.48.

³⁵ *Original Determinations*, USITC Pub. 4755 at 13.

³⁶ *Original Determinations*, USITC Pub. 4755 at 14-15.

³⁷ Domestic Producers' Prehear. Br. at 5.

³⁸ CR/PR at I-37.

³⁹ See generally CR/PR at I-31-I-36.

⁴⁰ 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act.⁴¹ This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.⁴² Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁴³

1. The Original Investigations

The Commission found a single domestic industry consisting of all domestic producers of CDMT, and which, consistent with its definition domestic like product, did not include domestic producers of as-welded tubes.⁴⁴

In the current reviews, Domestic Producers argue that the Commission should define the domestic industry to consist of all U.S. producers of CDMT.⁴⁵ Italian Respondents have not raised any domestic industry arguments.

⁴¹ See 19 U.S.C. § 1677(4)(B).

⁴² See *Torrington Co v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

⁴³ The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

- (1) the percentage of domestic production attributable to the importing producer;
- (2) the reason the U.S. producer has decided to import the product subject to investigation (whether the firm benefits from the LTFV sales or subsidies or whether the firm must import in order to enable it to continue production and compete in the U.S. market);
- (3) whether inclusion or exclusion of the related party will skew the data for the rest of the industry;
- (4) the ratio of import shipments to U.S. production for the imported product; and
- (5) whether the primary interest of the importing producer lies in domestic production or importation. *Changzhou Trina Solar Energy Co. v. USITC*, 100 F. Supp.3d 1314, 1326-31 (Ct. Int'l Trade 2015), *aff'd*, 879 F.3d 1377 (Fed. Cir. 2018); *see also Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁴⁴ *Original Determinations*, USITC Pub. 4755 at 15-16.

⁴⁵ Domestic Producers' Prehear. Br. at 5.

2. The Current Reviews

In these reviews, domestic producer *** may qualify as a related party through its affiliation with ***, a producer of CDMT in China, and ***, a producer of CDMT in India.⁴⁶ There is no evidence on the record that either of these affiliated foreign producers exported subject merchandise to the United States during the POR, however, as would be necessary for *** to qualify as a related party by virtue of its affiliation with the producers.⁴⁷ *** did not import subject merchandise and no responding U.S. importers reported importing subject imports produced by either *** during the POR.⁴⁸

Even if *** were to qualify as a related party, we find that appropriate circumstances do not exist to exclude it from the domestic industry. *** was the *** largest responding domestic producer in 2022, accounting for *** percent of domestic production that year.⁴⁹ ***.⁵⁰ Furthermore, there is no evidence on the record that *** affiliation with the Chinese and Indian producers shielded it from subject import competition or otherwise benefitted its operations such that its inclusion would skew domestic industry data, and no party has argued for its exclusion.

In sum, consistent with our definition of the domestic like product, we again define the domestic industry as all domestic producers of CDMT.

⁴⁶ CR/PR at I-39 n.55, Table I-19. ***, purchased *** short tons of CDMT from Germany in 2022. *Calculated from* ***. A domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be deemed a related party if it controls a purchaser of large volumes of subject imports. *See* SAA at 858. Deciding whether these relationships indicate a requisite control relationship is unnecessary because appropriate circumstances would not exist, in any event, to exclude *** from the domestic industry. The ratio of purchases of subject imports (** short tons) to *** U.S. production is less than *** percent, indicating that *** primary interest lies in domestic production and it would not be shielded from the impact of subject imports in a way that would mask injury to the domestic industry. *Calculated from* *** and CR/PR at Tables III-6, IV-1.

⁴⁷ *See* 19 U.S.C. § 1677(3)(B).

⁴⁸ CR/PR at I-39 n.55.

⁴⁹ CR/PR at Table I-18.

⁵⁰ CR/PR at Table I-18.

III. Cumulation

A. Legal Standard

With respect to five-year reviews, section 752(a) of the Tariff Act provides as follows: the Commission may cumulatively assess the volume and effect of imports of the subject merchandise from all countries with respect to which reviews under section 1675(b) or (c) of this title were initiated on the same day, if such imports would be likely to compete with each other and with domestic like products in the United States market. The Commission shall not cumulatively assess the volume and effects of imports of the subject merchandise in a case in which it determines that such imports are likely to have no discernible adverse impact on the domestic industry.⁵¹

Cumulation therefore is discretionary in five-year reviews, unlike original investigations, which are governed by section 771(7)(G)(i) of the Tariff Act.⁵² The Commission may exercise its discretion to cumulate, however, only if the reviews are initiated on the same day, the Commission determines that the subject imports are likely to compete with each other and the domestic like product in the U.S. market, and imports from each such subject country are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. Our focus in five-year reviews is not only on present conditions of competition, but also on likely conditions of competition in the reasonably foreseeable future. The statutory threshold for cumulation is satisfied in these reviews because all reviews were initiated on the same day: January 3, 2023.⁵³

B. The Original Investigations

The Commission found a reasonable overlap of competition between and among the domestic like product and subject imports from China, Germany, India, Italy, South Korea, and

⁵¹ 19 U.S.C. § 1675a(a)(7).

⁵² 19 U.S.C. § 1677(7)(G)(i); *see also, e.g., Nucor Corp. v. United States*, 601 F.3d 1291, 1293 (Fed. Cir. 2010) (Commission may reasonably consider likely differing conditions of competition in deciding whether to cumulate subject imports in five-year reviews); *Allegheny Ludlum Corp. v. United States*, 475 F. Supp. 2d 1370, 1378 (Ct. Int'l Trade 2006) (recognizing the wide latitude the Commission has in selecting the types of factors it considers relevant in deciding whether to exercise discretion to cumulate subject imports in five-year reviews); *Nucor Corp. v. United States*, 569 F. Supp. 2d 1328, 1337-38 (Ct. Int'l Trade 2008).

⁵³ *Notice of Institution*, 88 Fed. Reg. 114.

Switzerland.⁵⁴ It found that CDMT from each of the subject sources and domestically produced CDMT were sufficiently fungible.⁵⁵ The Commission found that subject imports from each source and the domestic like product shared the same channels of distribution, were sold in the same U.S. geographic markets, and were simultaneously present in the U.S. market throughout the January 2014 through June 2017 period of investigation (“POI”).⁵⁶ Accordingly, the Commission cumulated subject imports from China, Germany, India, Italy, South Korea, and Switzerland for purposes of its analysis of material injury.⁵⁷

C. Arguments of the Parties in the Current Reviews

1. Domestic Producers’ Arguments

Domestic Producers argue that the Commission should cumulate imports from all subject countries as it did in the original investigations.⁵⁸ They contend that subject imports

⁵⁴ *Original Determinations*, USITC Pub. 4755 at 20. The Commission was not persuaded by arguments by respondents, Mannesmann and Benteler, that subject imports from Germany should not have been cumulated with other subject imports because of limited fungibility. Specifically, the Commission found that while U.S. importer responses regarding interchangeability and non-price differences regarding subject imports from Germany and Switzerland versus other sources of CDMT were more varied than those from U.S. producers and purchasers, the vast majority of reporting importers found that subject imports from Germany or Switzerland were “always” or “frequently” interchangeable with CDMT from other subject sources, and that substantial percentages (roughly 45 percent in either comparison) found such products were at least “frequently” interchangeable with domestically produced CDMT. It highlighted that majorities or pluralities of purchasers found the domestic like product and subject imports from Germany comparable in 14 out of 15 purchasing factors, with substantial majorities finding the products comparable in terms of product range and quality meeting industry standards. The Commission also noted that majorities and pluralities of purchasers found that the domestic like product and subject imports from Switzerland were comparable in all 15 purchasing factors, with majorities finding the products comparable in terms of product range and quality meeting industry standards. *Original Determinations*, USITC Pub. 4755 at 18-19.

Likewise, the Commission was not persuaded by these respondents’ arguments that their shipments of customer-specific products to automotive end users and different contract types constituted distinct channels of distribution, finding that domestic producers and importers of CDMT from other subject countries also made shipments directly to end users in the automotive market. *Original Determinations*, USITC Pub. 4755 at 19. It also found that global frame contracts did not lead to distinct channels of distribution as they applied to *** of subject imports from Germany and were essentially equivalent to long-term contracts, which U.S. producers and importers of CDMT from other subject countries reported using. *Confidential Views*, EDIS Doc. 791893, at 27.

⁵⁵ *Original Determinations*, USITC Pub. 4755 at 17–18, 20.

⁵⁶ *Original Determinations*, USITC Pub. 4755 at 19–20.

⁵⁷ *Original Determinations*, USITC Pub. 4755 at 20.

⁵⁸ Domestic Producers’ Prehear. Br. at 10.

from each subject country are not likely to have no discernible adverse impact on the domestic industry,⁵⁹ that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product, and that the subject imports from each country are likely to compete under similar conditions of competition if the orders are revoked.⁶⁰ Domestic Producers urge the Commission to exercise its discretion to cumulate subject imports from all six countries because the record does not indicate that disaggregating them would be appropriate.

2. Italian Respondents' Arguments

Italian Respondents argue that subject imports from Italy are likely to have no discernible adverse impact because Italian subject producers are focused on their home and EU markets,⁶¹ are subject to U.S. section 232 TRQs, and operate at high capacity utilization rates.⁶² They also argue that competition between the remaining "negligible" volume of subject imports from Italy and the domestic like product would likely be attenuated because such imports would likely consist of either ***.⁶³ For these same reasons, they argue that subject imports from Italy are likely to compete under different conditions of competition than subject imports from the other subject countries.⁶⁴

Italian Respondents also contend that there is no reasonable overlap of competition between subject imports from Italy and CDMT from other subject countries. As support, they contend that the domestic industry either lacks "material or material certifications" or cannot produce certain CDMT products exported from Italy, including several European grades and "****" seamless CDMT for use in oil tool products.⁶⁵ They also claim

⁵⁹ Specifically in their view, absent continuation of the orders, the volume of subject imports from each country would likely be significant in terms of volume, would likely have significant effects on domestic prices, and would likely have a significant impact on the domestic industry. Domestic Producers' Prehear. Br. at 35-36.

⁶⁰ Domestic Producers' Prehear. Br. at 9-16, 35, 54.

⁶¹ Respondents' Prehear. Br. at 4-7, 10-14, 17, 24; Respondents' Posthear. Br. at 8, Exhibit 1 pgs. 9-10. They argue that Italian subject producers are not interested in the U.S. market, in part, due to Dalmine shifting its focus from exports of CDMT to out-of-scope hot-finished tubing products used in oil tools. Respondents' Prehear. Br. at 10, 32.

⁶² Respondents' Prehear. Br. at 4-7, 9-14, 17, 24.

⁶³ Respondents' Prehear. Br. at 13, 15-16, 30; Respondents' Posthear. Br. at 6.

⁶⁴ Respondents' Prehear. Br. at 17-21; Respondents' Posthear. Br. at 2-9.

⁶⁵ Respondents' Prehear. Br. at 16.

that subject imports from Italy differed from subject imports from other country sources because they entered primarily through Southern ports of entry and were sold ***.⁶⁶

D. Analysis

1. Likelihood of No Discernible Adverse Impact

The statute precludes cumulation if the Commission finds that subject imports from a country are likely to have no discernible adverse impact on the domestic industry.⁶⁷ Neither the statute nor the Uruguay Round Agreements Act (“URAA”) Statement of Administrative Action (“SAA”) provides specific guidance on what factors the Commission is to consider in determining that imports “are likely to have no discernible adverse impact” on the domestic industry.⁶⁸ With respect to this provision, the Commission generally considers the likely volume of subject imports and the likely impact of those imports on the domestic industry within a reasonably foreseeable time if the orders are revoked. Our analysis for each of the subject countries takes into account, among other things, the nature of the product and the behavior of subject imports in the original investigations.

China. During the original investigations, subject imports from China decreased from *** short tons in 2014, to *** short tons in 2015, and *** short tons in 2016; they were higher in January through June 2017 (“interim 2017”) at *** short tons than in January through June 2016 (“interim 2016”) at *** short tons.⁶⁹ The share of apparent U.S. consumption accounted for by shipments of subject imports from China decreased overall during the POI, increasing from *** percent in 2014, to *** percent in 2015, before decreasing to *** percent in 2016; it was higher in interim 2017 at *** percent than in interim 2016 at *** percent.⁷⁰

⁶⁶ Respondents’ Prehear. Br. at 16.

⁶⁷ 19 U.S.C. § 1675a(a)(7).

⁶⁸ SAA, H.R. Rep. No. 103-316, vol. I at 887 (1994).

⁶⁹ Cold-Drawn Mechanical Tubing from China and India Staff Report (“Confidential Report from Original Investigations”), Memorandum INV-PP-168, EDIS Doc. 791886 (Dec. 22, 2017) at Table IV-2. While firms responding to the Commission’s questionnaire during the original investigations accounted for *** percent of subject imports from China in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

⁷⁰ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

In the current reviews, subject imports from China decreased irregularly from 2017 through 2022 by *** percent, declining from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, before increasing to *** short tons in 2022; they were higher in January through June 2023 (“interim 2023”), at *** short tons, than in January through June 2022 (“interim 2022”), at *** short tons.⁷¹ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from China decreased from *** percent in 2017, to *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021, before increasing to *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent.⁷² Effective March 23, 2018, CDMT originating in China became subject to an additional 25 percent *ad valorem* duty under section 232 (“section 232 tariffs”).⁷³ Effective September 1, 2019, CDMT originating in China was subject to an additional 15 percent *ad valorem* duty under section 301 of the Trade Act of 1974, as amended (“section 301 tariffs”).⁷⁴ Effective February 14, 2020, Section 301 tariffs on CDMT from China were reduced to 7.5 percent *ad valorem*.⁷⁵

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from five firms, which accounted for approximately *** percent of CDMT production in China and approximately *** percent of U.S. imports of CDMT from China in 2016.⁷⁶ In these reviews, no Chinese firm provided full responses to the Commission’s foreign producer/exporter questionnaire, although 53 firms were identified by Domestic Producers as possible producers of CDMT in China.⁷⁷

Publicly available information indicates that there were several new CDMT producers, factories, and capacity expansion projects in China either underway during the POR or planned for the reasonably foreseeable future.⁷⁸ According to Global Trade Atlas (“GTA”) data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from China increased irregularly from 2017 to 2022, declining from 242,871 short tons in 2017

⁷¹ CR/PR at Table IV-1.

⁷² CR/PR at Tables I-21, C-1.

⁷³ CR/PR at I-22.

⁷⁴ CR/PR at I-22.

⁷⁵ CR/PR at I-22.

⁷⁶ CR/PR at IV-33; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-3.

⁷⁷ CR/PR at IV-33. Three of those 53 firms responded but indicated that they would not provide full responses as they have not produced CDMT since ***. *Id.*

⁷⁸ CR/PR at Table IV-10; Domestic Producers’ Posthear. Br. at Exhibit 2 (indicating that Chinese CDMT producer, Jiangsu Hongyi, completed a new factory in 2023).

to 241,957 short tons in 2018, increasing to 246,203 short tons in 2019 and 257,783 short tons in 2020, declining to 252,984 short tons in 2021, and then increasing to 328,105 short tons in 2022, a level 35.1 percent higher than in 2017.⁷⁹ China was the largest global exporter of such merchandise in 2022, accounting for 32.1 percent of all global exports of these products.⁸⁰ The largest export markets for these products from China in 2022 were South Korea, India, and Vietnam.⁸¹ During the POR, carbon and alloy steel pipes and tubes from China, a category that may include CDMT, were subject to countervailing duty orders in Australia, Brazil, and Canada, and antidumping duty orders and/or investigations in Australia, Brazil, Canada, India, Thailand, Turkey, the United Kingdom, and Ukraine.⁸²

In the original investigations, subject imports from China undersold the domestic like product in 19 of 27 (or 70.4 percent of) quarterly comparisons, accounting for *** percent of the volume of subject imports from China covered by the Commission's pricing data, with underselling margins ranging from *** to *** percent.⁸³ In these reviews, subject imports from China undersold the domestic like product in *** during the POR, with *** of *** percent, corresponding to *** short tons of subject imports from China.⁸⁴

In light of the foregoing, including the significant volume of subject imports from China during the original investigations, the continued presence of subject imports from China in the U.S. market during the POR, the information available regarding the Chinese industry's capacity and exports, and the underselling by subject imports from China in the original investigations, we find that subject imports from China would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Germany. During the original investigations, subject imports from Germany decreased from *** short tons in 2014, to *** short tons in 2015, and *** short tons in 2016; they were lower in interim 2017 at *** short tons than in interim 2016 at ***

⁷⁹ CR/PR at Tables IV-11, IV-57. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

⁸⁰ See CR/PR at Table IV-57.

⁸¹ CR/PR at Table IV-11.

⁸² CR/PR at Table IV-56.

⁸³ Confidential Report from the Original Investigations EDIS Doc. 791886 at Table V-12; CR/PR at V-23 n.9.

⁸⁴ CR/PR at Table V-14.

short tons.⁸⁵ The share of apparent U.S. consumption accounted for by shipments of subject imports from Germany decreased from *** percent in 2014, to *** percent in 2015, and *** percent in 2016; it was lower in interim 2017 at *** percent than in interim 2016 at *** percent.⁸⁶

In the current reviews, subject imports from Germany decreased irregularly from 2017 to 2022 by *** percent, declining from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, before increasing to *** short tons in 2021 and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.⁸⁷ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from Germany decreased overall during the POR, from *** percent in 2017, to *** percent in 2018, *** percent in 2019, and *** percent in 2020, before increasing to *** percent in 2021, and *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.⁸⁸ Effective from January 1, 2022 through December 31, 2025, CDMT originating in EU member countries, including Germany, have been subject to an annual section 232 TRQ, which permits 43,097 short tons of CDMT and out-of-scope steel products from Germany,⁸⁹ annually, to enter in-quota without section 232 tariffs but imposes 25 percent duties on out-of-quota imports above that level.⁹⁰

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from six firms, which accounted for approximately

⁸⁵ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-2. While firms responding to the Commission's questionnaire during the original investigations accounted for *** percent of subject imports from Germany in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

⁸⁶ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

⁸⁷ CR/PR at Table IV-1.

⁸⁸ CR/PR at Tables I-21, C-1.

⁸⁹ CR/PR at Table I-15. The TRQ volume would be equivalent to *** percent of apparent U.S. consumption in 2022.

⁹⁰ CR/PR at I-23 & n.28, Table I-15. Subject imports from Germany were subject to section 232 duties of 25 percent *ad valorem* from 2019 through 2021. CR/PR at I-23 n.28. Specifically, imports of steel articles, including CDMT, originating in EU member countries, including Germany, were initially exempted from the Section 232 tariffs, effective March 23, 2018, but became subject to 25 percent *ad valorem* section 232 tariffs effective June 1, 2018; they subsequently became subject to annual TRQs, effective between January 1, 2022, and December 31, 2025. CR/PR at I-23 n.28.

*** percent of CDMT production in Germany and approximately *** percent of U.S. imports of CDMT from Germany in 2016.⁹¹ In these reviews, the Commission received foreign producer/exporter questionnaire responses from three firms, which accounted for approximately *** of CDMT production in Germany and approximately *** percent of U.S. imports of CDMT from Germany in 2022.⁹²

The capacity of responding subject producers in Germany to produce CDMT declined throughout most of the POR, increasing initially from *** short tons in 2017 to *** short tons in 2018, before decreasing to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.⁹³ Their production declined throughout most of the POR, declining from *** short tons in 2017 to *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, and then increasing to *** short tons in 2021, before decreasing to *** short tons in 2022; it was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.⁹⁴ Their capacity utilization rate declined throughout most of the POR, from *** percent in 2017, to *** percent in 2018, *** percent in 2019, and *** percent in 2020, before increasing to *** percent in 2021 and then decreasing to *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent.⁹⁵ In 2022, these producers possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.⁹⁶ *** responding German producers reported producing other products on the same equipment and machinery used to produce CDMT; CDMT accounted for *** percent of the total overall production on the same equipment and machinery in 2022.⁹⁷

Total shipments of CDMT by the subject industry in Germany decreased from *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, before increasing to *** short tons in 2021, and decreasing to *** short tons in 2022; they were lower in interim 2023 at *** short tons in interim

⁹¹ CR/PR at IV-41; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-9.

⁹² CR/PR at IV-41.

⁹³ CR/PR at Table IV-18.

⁹⁴ CR/PR at Table IV-18.

⁹⁵ CR/PR at Table IV-18.

⁹⁶ *Calculated from* CR/PR at Tables I-22, IV-18, C-1.

⁹⁷ CR/PR at IV-52, Table IV-20.

2022 at *** short tons.⁹⁸ Exports of CDMT from Germany decreased from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, before increasing to *** short tons in 2021 and decreasing to *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.⁹⁹ Responding German producers' exports as a share of total shipments of CDMT ranged from *** percent to *** percent during each full year of the POR, with exports to the United States accounting for *** percent to *** percent of total shipments by both producers and resellers.¹⁰⁰ The average unit value ("AUV") of responding German producers' and resellers' exports to the United States was *** percent higher than the AUV of their exports to all non-U.S. destination markets in 2022.¹⁰¹

According to GTA data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Germany increased irregularly from 2017 to 2022, increasing from 167,911 short tons in 2017 to 183,745 short tons in 2018, decreasing to 161,230 short tons in 2019 and 120,966 short tons in 2020, before increasing to 166,636 short tons in 2021 and 175,322 short tons in 2022, a level 4.4 percent higher than in 2017.¹⁰² Germany was the second-largest global exporter of such merchandise, accounting for 17.1 percent of all global exports of these products in 2022.¹⁰³ The largest export markets for these products from Germany in 2022 were Italy, the United States, and France.¹⁰⁴

⁹⁸ CR/PR at Table IV-18.

⁹⁹ CR/PR at Table IV-18 (providing exports of CDMT by German producers). Exports of CDMT reported by both German producers and resellers were *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons. *Id.* at Table IV-19.

¹⁰⁰ CR/PR at Tables IV-18-19. Exports to all destination markets as a share of total shipments of CDMT reported by both German producers and resellers ranged from *** percent to *** percent during each full year of the POR. *Id.* at Table IV-19.

¹⁰¹ *Calculated from* CR/PR at Table IV-19. For example, in 2022, the AUV of reporting German producers' and resellers' exports to the United States was \$*** per short ton while the AUVs of their shipments to the EU were \$*** short tons, Asia were \$*** per short ton, and all other destination markets were \$*** per short ton. The AUV of their exports to all non-U.S. destination markets was \$*** in 2022. CR/PR at Table IV-19.

¹⁰² CR/PR at Table IV-21. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

¹⁰³ *See* CR/PR at Table IV-57.

¹⁰⁴ CR/PR at Table IV-21.

In the original investigations and the current reviews, no product-specific pricing data were collected on subject imports from Germany.¹⁰⁵

In light of the foregoing, including the significant volume of subject imports from Germany during the original investigations; the continued presence of subject imports from Germany in the U.S. market during the POR; and the subject German industry's large capacity, excess capacity, and exports, we find that subject imports from Germany would not likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

India. During the original investigations, subject imports from India decreased from *** short tons in 2014, to *** short tons in 2015, before increasing to *** short tons in 2016; they were higher in interim 2017 at *** short tons than in interim 2016 at *** short tons.¹⁰⁶ The share of apparent U.S. consumption accounted for by shipments of subject imports from India increased throughout the POI from *** percent in 2014, to *** percent in 2015, and *** percent in 2016; it was higher in interim 2017 at *** percent than in interim 2016 at *** percent.¹⁰⁷

In the current reviews, subject imports from India increased irregularly from 2017 to 2022 by *** percent, declining from *** short tons in 2017, to *** short tons in 2018, and *** short tons in 2019, increasing to *** short tons in 2020 and *** short tons in 2021,¹⁰⁸ and declining to *** short tons in 2022; they were lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.¹⁰⁹ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from India decreased from *** percent in 2017, to *** percent in 2018, and *** percent in 2019, before increasing to *** percent in 2020 and *** percent in 2021, and then decreasing to

¹⁰⁵ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table V-12; CR/PR at Table V-14.

¹⁰⁶ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-2. While firms responding to the Commission's questionnaire during the original investigations accounted for *** percent of subject imports from India in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

¹⁰⁷ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

¹⁰⁸ Domestic Producers assert that this increase was the result of Goodluck being temporarily removed from the antidumping duty order effective from May 10, 2020, through September 10, 2021, due to Commerce's remand determination being subsequently reversed by the CAFC. See Domestic Producer's Prehear. Br. at 30; *Goodluck Second Remand Order*, 86 Fed. Reg. 74069.

¹⁰⁹ CR/PR at Table IV-1.

*** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹¹⁰ Effective March 23, 2018, CDMT originating in India became subject to an additional 25 percent *ad valorem* section 232 tariff.¹¹¹

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from three firms accounting for approximately *** percent of CDMT production in India and approximately *** percent of U.S. imports of CDMT from India in 2016.¹¹² In these reviews, the Commission received a foreign producer/exporter questionnaire response from three firms, which accounted for approximately *** of CDMT production in India and approximately *** percent of U.S. imports of CDMT from India in 2022.¹¹³

The CDMT production capacity of responding Indian subject producers increased throughout the POR from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was higher in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹¹⁴ Their production increased irregularly from 2017 to 2022, increasing from *** short tons in 2017 to *** short tons in 2018, and then declining to *** short tons in 2019 and *** short tons in 2020, before increasing to *** short tons in 2021 and *** short tons in 2022; it was higher in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹¹⁵ Their capacity utilization rate increased irregularly from 2017 to 2022, increasing from *** percent in 2017 to *** percent in 2018, and then decreasing to *** percent in 2019 and *** percent in 2020, before increasing to *** percent in 2021, and *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹¹⁶ In 2022, these producers possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹¹⁷ *** responding Indian producers reported producing other products on the same equipment and machinery used to produce CDMT; CDMT

¹¹⁰ CR/PR at Tables I-21, C-1.

¹¹¹ CR/PR at I-22.

¹¹² CR/PR at IV-57; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-15.

¹¹³ CR/PR at IV-57.

¹¹⁴ CR/PR at Table IV-27. In addition, publicly available information on the record indicates that two subject producers expanded their capacity during the POR while a third subject producer is constructing a new production facility. CR/PR at Tables IV-23-24.

¹¹⁵ CR/PR at Table IV-27.

¹¹⁶ CR/PR at Table IV-27.

¹¹⁷ *Calculated from* CR/PR at Tables I-22, IV-27, C-1.

accounted for *** percent of the total overall production on the same equipment and machinery in 2022.¹¹⁸

Total CDMT shipments by the Indian industry increased from *** short tons in 2017 to *** short tons in 2018, decreased to *** short tons in 2019 and *** short tons in 2020, before increasing to *** short tons in 2021 and *** short tons in 2022; they were higher in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹¹⁹ Exports of CDMT from India increased irregularly during the POR, from *** short tons in 2017 to *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹²⁰ Responding Indian producers' exports as a share of total shipments of CDMT ranged from *** percent to *** percent during each full year of the POR, with exports to the United States accounting for *** percent to *** percent of total shipments.¹²¹ The AUVs of responding Indian producers' exports to the United States were lower than the AUVs of their exports to other markets throughout most of the POR, with the exception of exports to the EU.¹²²

According to GTA data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from India increased irregularly from 2017 to 2022, increasing from 13,489 short tons in 2017 to 19,221 short tons in 2018, and then decreasing to 14,393 short tons in 2019, and 9,163 short tons in 2020, before increasing to 15,994 short tons in 2021 and 22,918 short tons in 2022, a level 69.9 percent higher than in 2017.¹²³ The United States was the largest export market for these products from India in 2022.¹²⁴ During the POR, carbon and alloy steel pipes and tubes from India, a category that may include CDMT, were subject to AD and CVD orders in Canada.¹²⁵

¹¹⁸ CR/PR at Table IV-28.

¹¹⁹ CR/PR at Table IV-27.

¹²⁰ CR/PR at Table IV-27.

¹²¹ CR/PR at Table IV-27.

¹²² *Calculated from* CR/PR at Table IV-27. For example, in 2022, the AUV of reporting Indian producers' exports to the United States was \$*** per short ton while the AUVs of their shipments to the EU were \$*** short tons, Asia were \$*** per short ton, and all other destination markets were \$*** per short ton. The AUV of their exports to all non-U.S. destination markets was \$*** in 2022. CR/PR at Table IV-27.

¹²³ CR/PR at Table IV-28. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

¹²⁴ CR/PR at Table IV-28.

¹²⁵ CR/PR at Table IV-56.

In the original investigations, subject imports from India undersold the domestic like product in 16 of 44 (or 36.4 percent of) quarterly comparisons, accounting for *** percent of the volume of subject imports from India covered by the Commission's pricing data, with underselling margins ranging from *** to *** percent.¹²⁶ In the current reviews, no product-specific pricing data were collected on subject imports from India.¹²⁷

In light of the foregoing, including the significant and increasing volume and market share of subject imports from India in the original investigations; the continued presence of subject imports from India in the U.S. market during the POR; the subject Indian industry's large and increasing capacity, including excess capacity, and exports; and the underselling by subject imports from India in the original investigations, we find that subject imports from India would not likely have no discernible adverse impact on the domestic industry if the pertinent orders were revoked.

Italy. During the original investigations, subject imports from Italy increased by *** percent from 2014 to 2016, increasing from *** short tons in 2014, to *** short tons in 2015, before decreasing to *** short tons in 2016; they were lower in interim 2017 at *** short tons than in interim 2016 at *** short tons.¹²⁸ The share of apparent U.S. consumption accounted for by shipments of subject imports from Italy increased *** percentage points from 2014 to 2016, increasing from *** percent in 2014 to *** percent in 2015 and 2016; it was lower in interim 2017 at *** percent than in interim 2016 at *** percent.¹²⁹

In the current reviews, subject imports from Italy maintained a presence in the U.S. market, but at lower levels than during the original investigations, decreasing irregularly from 2017 to 2022 by *** percent, declining from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, before increasing to ***

¹²⁶ Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table V-12; CR/PR at V-23 n.9.

¹²⁷ CR/PR at Table V-14.

¹²⁸ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-2. While firms responding to the Commission's questionnaire during the original investigations accounted for *** percent of subject imports from Italy in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

¹²⁹ CR/PR at C-1; Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

short tons in 2021 and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹³⁰ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from Italy decreased from *** percent in 2017, to *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021 and 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent.¹³¹ Effective from January 1, 2022 through December 31, 2025, CDMT originating in EU member countries, including Italy, have been subject to an annual section 232 TRQ, which permits 12,775 short tons of CDMT and out-of-scope steel products from Italy, annually,¹³² to enter in-quota without section 232 tariffs but imposes 25 percent duties on out-of-quota imports above that level.¹³³

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from four firms, which accounted for *** CDMT production in Italy and approximately *** percent of U.S. imports of CDMT from Italy in 2016.¹³⁴ In these reviews, the Commission received foreign producer/exporter questionnaire responses from four firms, which accounted for approximately *** percent of CDMT production in Italy and *** percent of U.S. imports of CDMT from Italy in 2022.¹³⁵

The capacity of responding subject producers in Italy to produce CDMT increased from *** short tons in 2017 to *** short tons in 2018, and *** short tons in 2019, before decreasing to *** short tons in 2020, increasing to *** short tons in 2021, and decreasing slightly to *** short tons in 2022; it was *** short tons in interim 2023 and interim 2022.¹³⁶ Their production increased irregularly from 2017 to 2022, increasing from *** short tons in 2017 to *** short tons in 2018, and then decreasing to *** short tons in 2019 and *** short tons in 2020, increasing to *** short tons in 2021, before decreasing to *** short tons in 2022; it was lower in interim 2023 at

¹³⁰ CR/PR at Table IV-1.

¹³¹ CR/PR at Tables I-21, C-1.

¹³² CR/PR at Table I-15. The TRQ volume would be equivalent to *** percent of apparent U.S. consumption in 2022. *Calculated* from CR/PR at Tables I-15, C-1.

¹³³ CR/PR at I-23 & n.28, Table I-15. Subject imports from Italy were subject to section 232 duties of 25 percent *ad valorem* from 2019 through 2021. CR/PR at I-23 n.28.

¹³⁴ CR/PR at IV-72; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-21.

¹³⁵ CR/PR at IV-72.

¹³⁶ CR/PR at Table IV-36. Thus, the capacity of responding subject producers in Italy to produce CDMT increased *** percent from 2017 to 2022. *Id.*

*** short tons than in interim 2022 at *** short tons.¹³⁷ Their capacity utilization rate increased overall during the POR, increasing from *** percent in 2017 to *** percent in 2018, decreasing to *** percent in 2019 and *** percent in 2020, increasing to *** percent in 2021, and final decreasing to *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹³⁸ In 2022, these producers possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹³⁹ *** responding Italian producers reported producing other products on the same equipment and machinery used to produce CDMT; CDMT accounted for *** percent of the total overall production on the same equipment and machinery in 2022.¹⁴⁰

Total shipments of CDMT by the industry in Italy increased irregularly from 2017 to 2022, increasing from *** short tons in 2017 to *** short tons in 2018, and then declining to *** short tons in 2019 and *** short tons in 2020, increasing to *** short tons in 2021, before declining to *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁴¹ Italian producers reported that their exports of CDMT from Italy increased irregularly from 2017 to 2022, initially increasing from *** short tons in 2017, to *** short tons in 2018, then decreasing to *** short tons in 2019 and *** short tons in 2020, before increasing to *** short tons in 2021 and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁴² Exports as a share of total shipments of CDMT reported by responding Italian producers and resellers ranged from *** percent to *** percent during each full year of the POR with their exports to the United States as a share of their total shipments ranging from *** percent to ***

¹³⁷ CR/PR at Table IV-36. Accordingly, the production of responding subject producers in Italy increased *** percent from 2017 to 2022. *Id.*

¹³⁸ CR/PR at Table IV-36.

¹³⁹ *Calculated* from CR/PR at Tables I-22, IV-36, C-1.

¹⁴⁰ CR/PR at IV-83, Table IV-38.

¹⁴¹ CR/PR at Table IV-36. Thus, total shipments of CDMT in Italy by the industry increased *** percent from 2017 to 2022. *Id.*

¹⁴² CR/PR at Table IV-36. Accordingly, the Italian producers' exports of CDMT from Italy increased *** percent from 2017 to 2022. *Id.* Exports of CDMT reported by both Italian producers and resellers were *** short tons in 2017; *** short tons in 2018; *** short tons in 2019; *** short tons in 2020; *** short tons in 2021; and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons. CR/PR at Table IV-37. Therefore, the exports of CDMT reported by both Italian producers and resellers increased *** percent from 2017 to 2022. *Id.*

percent during this same period.¹⁴³ The AUVs of responding Italian producers' and resellers' exports to the United States were *** percent higher than the AUVs of their exports to all non-U.S. destination markets in 2022.¹⁴⁴

According to GTA data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Italy increased irregularly from 2017 to 2022, increasing from 66,969 short tons in 2017 to 85,963 short tons in 2018, and then declining to 75,941 short tons in 2019 and 53,707 short tons in 2020, before increasing to 71,981 short tons in 2021 and 82,312 short tons in 2022, a level 22.9 percent higher than in 2017.¹⁴⁵ Italy was the third-largest exporter of such merchandise, accounting for 8.1 percent of all global exports of these products in 2022.¹⁴⁶ The largest export markets for these products from Italy in 2022 were Germany, Romania, and Bulgaria.¹⁴⁷

In the original investigations, subject imports from Italy undersold the domestic like product in 23 of 31 (or 74.2 percent of) quarterly comparisons, accounting for *** percent of the volume of subject imports from Italy covered by the Commission's pricing data, with underselling margins ranging from *** to *** percent.¹⁴⁸ In the current reviews, no usable price comparison data were reported regarding subject imports from Italy.¹⁴⁹

¹⁴³ CR/PR at Table IV-37. Responding Italian producers' exports as a share of their total shipments of CDMT ranged from *** percent to *** percent during each full year of the POR. *Id.* at Table IV-36.

¹⁴⁴ *Calculated from* CR/PR at Table IV-37. For example, in 2022, the AUV of reporting Italian producers' and resellers' exports to the United States was \$*** per short ton while the AUVs of their shipments to the EU were \$*** per short ton, Asia were \$*** per short ton, Canada were \$*** per short ton, and all other destination markets were \$*** per short ton. The AUV of their exports to all non-U.S. destination markets was \$*** per short ton in 2022. CR/PR at Table IV-37.

¹⁴⁵ CR/PR at Table IV-39. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

¹⁴⁶ See CR/PR at Tables IV-39, IV-57.

¹⁴⁷ CR/PR at Table IV-39.

¹⁴⁸ Confidential Report from the Original Investigations, EDIS Doc. 791886 at VII-15, Table V-12; CR/PR at V-23 n.9.

¹⁴⁹ CR/PR at Table V-14. Consistent with the original investigations, pricing data provided by *** were not included in the price comparison data. *Id.* at V-9 n.8. We are unpersuaded by Italian Respondents' argument that one alleged instance of overselling by subject imports from Italy as well as the purportedly high AUV of subject imports from Italy indicate that these imports would have no discernible adverse impact if the order were revoked. See Respondents' Prehear. Br. at 30-31. Notwithstanding that there were no product comparisons available involving subject imports from Italy, see CR/PR at V-9 n.8, Tables V-6-8 (indicating that consistent with the treatment of data during the original investigations, data reported by importer *** was excluded from the price comparison data as it was for *** CDMT for products 1 and 2), overselling by subject imports from Italy and AUV data during (Continued...)

In light of the factors discussed above, including the significant and increasing volume of subject imports from Italy during the original investigations; the continued presence of subject imports from Italy in the U.S. market during the POR; the subject Italian industry's large capacity, including excess capacity, and exports; and the underselling by subject imports from Italy in the original investigations, we find that subject imports from Italy would not likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.¹⁵⁰

South Korea. During the original investigations, subject imports from South Korea decreased from *** short tons in 2014, to *** short tons in 2015, and *** short tons in 2016; they were higher in interim 2017 at *** short tons than in interim 2016 at *** short tons.¹⁵¹ The share of apparent U.S. consumption accounted for by shipments of subject imports from South Korea increased from *** percent in 2014, to *** percent in 2015, and *** percent 2016; it was higher in interim 2017 at *** percent than in interim 2016 at *** percent.¹⁵²

In the current reviews, subject imports from South Korea decreased irregularly from 2017 to 2022 by *** percent, declining from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, and *** short tons in 2021, before increasing to *** short tons in 2022; they were lower in interim 2023 at *** short

the POR, under the disciplining effects of the order, are not predictive of the pricing of subject imports from Italy after revocation. As discussed above, subject imports from Italy undersold the domestic like product in 23 of 31 quarterly comparisons during the original investigations.

¹⁵⁰ For the reasons discussed in section III.D.3 below, we are unpersuaded by Italian Respondents' arguments that competition between subject imports from Italy and the domestic like product would likely be attenuated in the event of revocation; subject imports from Italy would likely remain "negligible" if the order were revoked because of Dalmine's impending loss of its largest U.S. customer, ***; the alleged focus by subject imports from Italy on oil tool products and European grades not substitutable with the domestic like product; the Italian subject producers' alleged focus on their home and EU markets; the section 232 TRQ; and Italian subject producers' purportedly high capacity utilization rates. Respondents' Prehear. Br. at 4-27; Respondents' Posthear. Br. at 2-9, Exhibit 1 pgs. 25-28.

¹⁵¹ Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-2. While firms responding to the Commission's questionnaire during the original investigations accounted for *** percent of subject imports from South Korea in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

¹⁵² CR/PR at C-1; Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

tons than in interim 2022 at *** short tons.¹⁵³ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from South Korea decreased from *** percent in 2017, to *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021, before increasing *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹⁵⁴ CDMT originating in South Korea is subject to an absolute annual quota of 9,797 short tons under section 232, which would have been equivalent to *** percent of apparent U.S. consumption in 2022.¹⁵⁵

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from two firms, which accounted for *** CDMT production in South Korea and approximately *** percent of U.S. imports of CDMT from South Korea in 2016.¹⁵⁶ In these reviews, the Commission received one foreign producer/exporter questionnaire response, which accounted for approximately *** percent of CDMT production in South Korea and approximately *** percent of U.S. imports of CDMT from South Korea in 2022.¹⁵⁷

The capacity of the responding subject producer in South Korea remained at *** short tons from 2017 through 2022; it was *** short tons in interim 2023 and interim 2022.¹⁵⁸ Its production decreased irregularly from 2017 to 2022 and was *** short tons in 2017 and 2018, before declining to *** short tons in 2019, increasing to *** short tons in 2020 and 2021, and declining to *** short tons in 2022; it was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁵⁹ Its capacity utilization rate decreased from *** percent in 2017 and 2018 to *** percent in 2019, increased to *** percent in 2020 and 2021, and decreased to *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹⁶⁰ In 2022, it possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹⁶¹

¹⁵³ CR/PR at Table IV-1.

¹⁵⁴ *Calculated from* CR/PR at Tables I-21, C-1.

¹⁵⁵ *Calculated from* CR/PR at Tables I-15, I-21.

¹⁵⁶ CR/PR at IV-88; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-27.

¹⁵⁷ CR/PR at IV-88.

¹⁵⁸ CR/PR at Table IV-44. In addition, publicly available information on the record indicates that there were several new CDMT producers, factories, and capacity expansion projects in South Korea during the POR. CR/PR at Table IV-41; Domestic Producers' Prehear. Br. at Exhibit 12.

¹⁵⁹ CR/PR at Table IV-44.

¹⁶⁰ CR/PR at Table IV-44.

¹⁶¹ *Calculated from* CR/PR at Tables I-22, IV-44, C-1.

This producer reported producing no other products on the same equipment and machinery used to produce CDMT.¹⁶²

This producer's total and export shipments were the same because it had no home market shipments during the POI. Export shipments increased irregularly from 2017 to 2022, declining from *** short tons in 2017 and 2018 to *** short tons in 2019, increasing to *** short tons in 2020 and 2021, and then declining to *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁶³ This producer's exports to the United States accounted for between *** and *** percent of total its shipments during each full year of the POR.¹⁶⁴ The AUVs of its exports to the United States *** to the AUVs of its exports to other markets throughout the entire POR.¹⁶⁵

According to GTA data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from South Korea decreased irregularly from 2017 to 2022, declining from 47,169 short tons in 2017, to 46,834 short tons in 2018, 34,159 short tons in 2019, and 18,594 short tons in 2020, before increasing to 24,616 short tons in 2021 and 38,314 short tons in 2022, a level 18.8 percent lower than in 2017.¹⁶⁶ The largest export markets for these products from South Korea in 2022 were Canada, Chile, and Romania.¹⁶⁷ During the POR, carbon and alloy steel pipes and tubes from South Korea, a category that may include CDMT, were subject to antidumping duty orders in Australia, Canada, and Thailand and countervailing duty orders in Australia and Canada.¹⁶⁸

In the original investigations, subject imports from South Korea undersold the domestic like product in the three available quarterly comparisons (accounting for all of the limited volume of subject imports from South Korea covered by the Commission's pricing data) with underselling margins ranging from *** to *** percent, involving *** short tons of subject merchandise.¹⁶⁹ In these reviews, subject imports from South Korea undersold the domestic like product in *** of *** (or *** percent of) quarterly comparisons during the POR, accounting for *** percent of the volume of subject imports from South Korea covered by the Commission's pricing data, with underselling margins ranging from *** to ***

¹⁶² CR/PR at IV-96.

¹⁶³ CR/PR at Table IV-44.

¹⁶⁴ CR/PR at Table IV-44.

¹⁶⁵ CR/PR at IV-44.

¹⁶⁶ CR/PR at Table IV-45. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

¹⁶⁷ CR/PR at Table IV-45.

¹⁶⁸ CR/PR at Table IV-56.

¹⁶⁹ Confidential Report from the Original Investigations at Table V-12; CR/PR at V-23 n.9.

percent.¹⁷⁰ These instances of underselling involved reported sales of *** short tons, accounting for *** percent of the volume of subject imports from South Korea covered by the Commission's pricing data.¹⁷¹

In light of the foregoing, including the significant volume and market share of subject imports from South Korea during the original investigations; the continued presence of subject imports from South Korea in the U.S. market during the POR; the information available regarding the subject Korean industry's capacity, excess capacity, and exports; and the underselling by subject imports from South Korea during the original investigations and current reviews, we find that subject imports from South Korea would not likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

Switzerland. During the original investigations, subject imports from Switzerland decreased from *** short tons in 2014, to *** short tons in 2015, and *** short tons in 2016; they were higher in interim 2017 at *** short tons than in interim 2016 at *** short tons.¹⁷² The share of apparent U.S. consumption accounted for by shipments of subject imports from Switzerland decreased from *** percent in 2014, to *** percent in 2015, before increasing to *** percent 2016; it was *** percent in interim 2017 and interim 2016.¹⁷³

In the current reviews, subject imports from Switzerland decreased irregularly from 2017 to 2022 by *** percent, increasing from *** short tons in 2017 to *** short tons in 2018, before decreasing to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁷⁴ The share of apparent U.S. consumption accounted for by U.S. shipments of subject imports from Switzerland increased from *** percent in 2017 to *** percent in 2018, before decreasing to *** percent in 2019,

¹⁷⁰ CR/PR at Table V-14.

¹⁷¹ CR/PR at Table V-14.

¹⁷² Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-2. While firms responding to the Commission's questionnaire during the original investigations accounted for *** percent of subject imports from Switzerland in 2016, the Commission supplemented data for nonresponding U.S. importers with proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. *Confidential Views*, EDIS Doc. 791893 at 4; Confidential Report from Original Investigations, EDIS Doc. 791886 at Tables I-1, IV-2.

¹⁷³ CR/PR at C-1; Confidential Report from Original Investigations, EDIS Doc. 791886 at Table IV-13.

¹⁷⁴ CR/PR at Table IV-1.

*** percent in 2020, *** percent in 2021, and *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.¹⁷⁵ Effective March 23, 2018, CDMT originating in Switzerland became subject to an additional 25 percent *ad valorem* section 232 tariff.¹⁷⁶

In the final phase of the original investigations, the Commission received foreign producer/exporter questionnaire responses from three firms, which accounted for *** CDMT production in Switzerland and approximately *** percent of U.S. imports of CDMT from Switzerland in 2016.¹⁷⁷ In these reviews, the Commission received a producer/exporter questionnaire response from two firms, Benteler Rothrist AG (“Benteler”) and Jansen AG (“Jansen”). However, Jansen only provided data for the period of 2017 through April 2021.¹⁷⁸ Benteler accounted for approximately *** of CDMT production in Switzerland and *** U.S. imports of CDMT from Switzerland in 2022.¹⁷⁹ Benteler announced that it would close its facility in Switzerland by the end of 2023 but later indicated it would continue production at least into the summer of 2024.¹⁸⁰

The CDMT production capacity of responding Swiss producers was *** short tons from 2017 through 2020, before decreasing to *** short tons in 2021 and *** short tons in 2022; it was *** short tons in interim 2023 and interim 2022.¹⁸¹ Their production declined throughout most of the POR, increasing from *** short tons in 2017 to *** short tons in 2018, before decreasing to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁸² Their capacity utilization rate increased from *** percent in 2017 to *** percent in 2018, before decreasing to *** percent in 2019 and *** percent in 2020, increasing to *** percent in 2021 and 2021, and *** decreasing to *** percent in 2022; it was lower in interim 2023 at ***

¹⁷⁵ CR/PR at Tables I-21, C-1.

¹⁷⁶ CR/PR at I-22.

¹⁷⁷ CR/PR at IV-101; Confidential Report from Original Investigations, EDIS Doc. 791886 at VII-33.

¹⁷⁸ CR/PR at IV-101. Jansen provided a response to the Commission’s foreign producer questionnaire for its operations through April 2021. Jansen was purchased by Swiss CDMT producer Mubea in April 2021 and responded to the Commission’s questionnaire concerning its CDMT operations in Switzerland prior to the purchase. Mubea did not respond to the Commission’s foreign producer questionnaire. CR/PR at IV-101 n.35.

¹⁷⁹ CR/PR at IV-101.

¹⁸⁰ CR/PR at IV-101, Table IV-47.

¹⁸¹ CR/PR at Table IV-50.

¹⁸² CR/PR at Table IV-50.

percent than in interim 2022 at *** percent.¹⁸³ In 2022, *** possessed excess capacity of *** short tons, equivalent to *** percent of apparent U.S. consumption that year.¹⁸⁴ *** produced other products on the same equipment and machinery used to produce CDMT with CDMT accounting for *** of its total production on the same equipment machinery in 2022.¹⁸⁵

Responding Swiss subject producers' total shipments increased from *** short tons in 2017 to *** short tons in 2018, before decreasing to *** short tons in 2019, *** short tons in 2020, ***, short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁸⁶ Exports of CDMT from Switzerland initially increased from *** short tons in 2017 to *** short tons in 2018, before decreasing to *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.¹⁸⁷ Responding Swiss producers' exports as a share of total shipments of CDMT ranged from *** percent to *** percent during each full year of the POR, with exports to the United States accounting for *** percent to *** percent of total shipments.¹⁸⁸ The AUVs of Bentelers' exports to the United States were *** percent higher than the AUV of its exports to all non-U.S. destination markets in 2022.¹⁸⁹

According to GTA data, global exports of certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Switzerland decreased irregularly from 2017 to 2022, increasing from 842 short tons in 2017 to 1,065 short tons in 2018, before declining to 821 short tons in 2019 and 709 short tons in 2020, increasing slightly to 798 short tons in 2021, and declining to 786 short tons in 2022, a level 6.7 percent lower than in 2017.¹⁹⁰ The largest

¹⁸³ CR/PR at Table IV-50.

¹⁸⁴ *Calculated from* CR/PR at Tables I-22, IV-50, C-1.

¹⁸⁵ CR/PR at IV-111, Table IV-51.

¹⁸⁶ CR/PR at Table IV-50.

¹⁸⁷ CR/PR at Table IV-50.

¹⁸⁸ CR/PR at Table IV-50.

¹⁸⁹ *Calculated from* CR/PR at Table IV-50. For example, in 2022, the AUV of Benteler's exports to the United States was \$*** per short ton while the AUVs of their shipments to the EU were \$*** per short ton, Asia were \$*** per short ton, and all other destination markets were \$*** per short ton. The AUV of their exports to all non-U.S. destination markets was \$*** in 2022. CR/PR at Table IV-50.

¹⁹⁰ CR/PR at Table IV-52. Based on official export statistics under HS subheadings 7304.31 and 7304.51, categories that include CDMT and out-of-scope merchandise. *Id.*

export markets for these products from Switzerland in 2022 were Germany, the United States, and Spain.¹⁹¹

In the original investigations and the current reviews, no product-specific pricing data were collected on subject imports from Switzerland.¹⁹²

In light of the foregoing, including the significant volume and market share of subject imports from Switzerland during the original investigations; the continued presence of subject imports from Switzerland in the U.S. market during the POR; and the subject Swiss industry's large capacity, including excess capacity, and exports; we find that subject imports from Switzerland would not likely have no discernible adverse impact on the domestic industry if the pertinent order were revoked.

2. Likelihood of a Reasonable Overlap of Competition

The Commission generally has considered four factors intended to provide a framework for determining whether subject imports compete with each other and with the domestic like product.¹⁹³ Only a “reasonable overlap” of competition is required.¹⁹⁴ In five-year reviews, the

¹⁹¹ CR/PR at Table IV-52.

¹⁹² Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table V-12; CR/PR at Table V-14.

¹⁹³ The four factors generally considered by the Commission in assessing whether imports compete with each other and with the domestic like product are as follows: (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including consideration of specific customer requirements and other quality-related questions; (2) the presence of sales or offers to sell in the same geographical markets of imports from different countries and the domestic like product; (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and (4) whether subject imports are simultaneously present in the market with one another and the domestic like product. *See, e.g., Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

¹⁹⁴ *See Mukand Ltd. v. United States*, 937 F. Supp. 910, 916 (Ct. Int’l Trade 1996); *Wieland Werke*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”); *United States Steel Group v. United States*, 873 F. Supp. 673, 685 (Ct. Int’l Trade 1994), *aff’d*, 96 F.3d 1352 (Fed. Cir. 1996). We note, however, that there have been investigations where the Commission has found an insufficient overlap in competition and has declined to cumulate subject imports. *See, e.g., Live Cattle from Canada and Mexico*, Inv. Nos. 701-TA-386 and 731-TA-812-13 (Preliminary), USITC Pub. 3155 at 15 (Feb. 1999), *aff’d sub nom., Ranchers-Cattlemen Action Legal Foundation v. United States*, 74 F. Supp. 2d 1353 (Ct. Int’l Trade 1999); *Static Random Access Memory Semiconductors from the Republic of Korea and Taiwan*, Inv. Nos. 731-TA-761-62 (Final), USITC Pub. 3098 at 13-15 (Apr. 1998).

relevant inquiry is whether there likely would be competition even if none currently exists because the subject imports are absent from the U.S. market.¹⁹⁵

Fungibility. In the original investigations, the Commission found that subject imports from each subject country were sufficiently fungible with the domestic like product and each other.¹⁹⁶

In these reviews, the record shows that subject imports from China, Germany, India, Italy, South Korea, and Switzerland remain fungible with the domestic like product and each other. Majorities of responding domestic producers, importers, and purchasers reported that CDMT from the United States is always or frequently interchangeable with CDMT from each subject country, with the exception of importers' responses regarding subject imports from Italy and Germany.¹⁹⁷

Both the domestic industry and subject imports supplied each pipe type of CDMT (carbon steel welded pipe, carbon steel seamless pipe, alloy steel welded pipe, and alloy steel seamless pipe) to the U.S. market in 2022, albeit in different concentrations, with U.S. producers accounting for the majority of shipments of each product type at significant

¹⁹⁵ See generally, *Chefline Corp. v. United States*, 219 F. Supp. 2d 1313, 1314 (Ct. Int'l Trade 2002).

¹⁹⁶ *Original Determinations*, USITC Pub. 4755 at 19. In the original investigations, the Commission disagreed with arguments from Benteler and Mannesmann that questionnaire responses regarding interchangeability and non-price differences indicated limited fungibility. While the Commission observed that there were some differences in the product mix between subject imports from Switzerland and Germany, on the one hand, and subject imports from the other subject countries, on the other, in the pricing data, it found that it was not sufficient to indicate a lack of fungibility given the "broad overlaps in product type" and "some product overlap." *Id.* Nearly all U.S. purchasers reported that subject imports from each country and the domestic like product "always" or "usually" met minimum quality specifications. *Id.*

¹⁹⁷ CR/PR at Tables II-21-23. An equal number of importers reported that subject imports from Germany are always, frequently, or sometimes interchangeable (one), while two importers reported that subject imports from Germany are never interchangeable. *Id.* at Table II-22. An equal number of importers reported that subject imports from Italy are frequently, sometimes, or never interchangeable (two) while one importer responded that subject imports from Italy are always interchangeable. *Id.* We note that, ***. U.S. Importers' Questionnaire Response of *** at III-22-23. *** added that it ***. *Id.* at III-22. *** also indicated that regarding ***. *Id.* at III-23.

volumes.¹⁹⁸ That year, the vast majority of the domestic industry's U.S. shipments consisted of carbon steel welded pipe and carbon steel seamless pipe, as did a majority of U.S. shipments of subject imports from China, Germany, India, and Italy.¹⁹⁹ Nearly all U.S. shipments of subject imports from South Korea and Switzerland consisted of carbon steel welded pipe.²⁰⁰ The domestic industry and subject imports from China, Germany, India, Italy, South Korea, and Switzerland also substantially overlapped in terms of the end use sectors of the U.S. market that they supplied in 2022, particularly with respect to the automotive, heavy machinery, and other end uses sectors.²⁰¹

A majority of purchasers reported either sometimes or never making CDMT purchasing decisions based on the country of origin and a vast majority of purchasers with knowledge of the topic reported that domestically produced CDMT and subject imports from each subject country met minimum quality specifications.²⁰² A majority of purchasers reported that domestically produced CDMT was either superior or comparable with CDMT from each of the subject countries across 15 purchasing factors with few exceptions, primarily relating to price,

¹⁹⁸ CR/PR at Table IV-5 (indicating that the domestic industry shipped *** short tons of carbon steel welded pipe accounting for *** percent of all U.S. shipments, *** short tons of carbon steel seamless pipe accounting for *** percent of all U.S. shipments, *** short tons of alloy steel welded pipe accounting for *** percent of all U.S. shipments, and *** short tons of alloy steel seamless pipe accounting for *** percent of all U.S. shipments).

¹⁹⁹ CR/PR at Table IV-5.

²⁰⁰ CR/PR at Table IV-5.

²⁰¹ CR/PR at Tables IV-4-5. In 2022, 14.9 percent of the domestic industry's U.S. shipments were made to the agriculture sector, 40.1 percent to the automotive sector, 35.7 percent to the heavy machinery sector, 4.4 percent to the oil and gas sector, and 5.0 percent to other end uses/sectors. CR/PR at Table IV-4. By comparison, that same year, *** percent of U.S. shipments of subject imports from China were made to other end uses/sectors; *** percent of U.S. shipments of subject imports from Germany were made to the automotive sector and *** percent to the heavy machinery sector; *** percent of U.S. shipments of subject imports from India were made to the heavy machinery sector and *** percent to other end uses/sectors; *** percent of U.S. shipments of subject imports from Italy were made to the heavy machinery sector; *** percent of U.S. shipments of subject imports from South Korea were made to the agricultural sector, *** percent to the automotive sector, and *** percent to the heavy machinery sector; and *** percent of U.S. shipments of subject imports from Switzerland were made to the automotive sector. CR/PR at Tables IV-4-5.

²⁰² CR/PR at Tables II-14, II-17.

product range, and availability.²⁰³ A large majority of responding purchasers with knowledge reported that domestic CDMT “always” or “usually” meets minimum quality specifications.²⁰⁴

All responding domestic producers reported that differences other than price were either sometimes or never significant between and among CDMT from the United States and each subject source.²⁰⁵ The majority of responding purchasers also reported that differences other than price were sometimes or never significant between and among CDMT from the United States and each subject source, except when comparing domestic like product with subject imports from China and Italy and when comparing subject imports from China and Italy.²⁰⁶ Importer responses were more varied as a majority of responding importers reported that factors other than price were sometimes or never significant in comparing the domestic like product to CDMT from Germany but always or frequently significant in comparing the domestic like product to CDMT from Italy, South Korea, and Switzerland. Responding importers were evenly divided between those reporting that differences other than price were sometimes significant and those reporting that such differences are always or frequently significant in comparing the domestic like product to CDMT from China and India.²⁰⁷

²⁰³ CR/PR at Table II-20. An equal number of purchasers rated the domestic like product as inferior, comparable, and superior to subject imports from China with respect to product range; an equal number of purchasers rated the domestic like product as inferior and comparable to subject imports from Germany with respect to product range; a majority of purchasers reported that domestically produced CDMT was inferior in terms of availability and product range compared to subject imports from Italy; a majority of purchasers reported that domestically produced CDMT was inferior in terms of price compared to subject imports from China, India, South Korea, and Switzerland (meaning that domestically produced CDMT is priced higher than subject imports from each country); and the only purchaser of CDMT from Switzerland reported that domestically produced CDMT was inferior in terms of availability, packaging, minimum quantity requirements, and product range compared to subject imports from Switzerland. *Id.*

²⁰⁴ CR/PR at Table II-17.

²⁰⁵ CR/PR at Table II-24.

²⁰⁶ CR/PR at Table II-26. A majority of purchasers reported that differences in factors other than price between the domestic like product and subject imports from China and Italy were either always or frequently significant. *Id.* An equal amount of importers (one) reported that differences in factors between subject imports from Italy and China were either sometimes or frequently significant. *Id.*

²⁰⁷ CR/PR at Table II-25. Responses from importers regarding the significance of differences of factors other than price between each subject source were even more varied. An equal amount of importers reported that subject imports from China and the other subject countries were always significant as those reporting that they were either sometimes or never significant for all country comparisons except India and Switzerland; an equal amount of importers reported that subject imports from Germany and the other subject countries were always significant as those that reported that they were either sometimes or never significant for all country comparisons except India and Switzerland; a (Continued...)

We are unpersuaded by Italian Respondents' argument that there would likely be a limited degree of fungibility between subject imports from Italy, subject imports from other sources, and the domestic like product in the event of revocation.²⁰⁸ First, the record does not support Italian Respondents' assertion that the domestic industry cannot supply certain "specialty" CDMT that are available from Italy such as "proprietary grades" sold to ***, CDMT for oil tool products, and CDMT sold to ***.²⁰⁹ Metalfer concedes that the "unique," "specialty products" it once sold to ***, and that made up *** during the period examined in the original investigations,²¹⁰ are now being supplied by the domestic industry,²¹¹ which is "****" and "have adapted their product needs to meet {***} specifications."²¹² Similarly, Domestic Producers indicated that they can produce "virtually all {CDMT} products demanded by the market" "within {their} size range."²¹³ Consistent with this testimony, as indicated above, the

majority of importers reported that subject imports from India and the other subject countries were always significant as those that reported that they were either sometimes or never significant for all country comparisons except Italy and Switzerland; one responding importer reported always significant differences between subject imports from Italy and South Korea; and one responding importer reported sometimes significant differences between subject imports from Italy and Switzerland. *Id.*

²⁰⁸ We note that the arguments regarding fungibility presented in these reviews by the Italian Respondents are generally premised on Italian CDMT producers' behavior under the discipline of the orders, and not necessarily determinative as to the types and range of CDMT products that could be sold by subject producers in Italy if the orders were terminated.

²⁰⁹ Respondents' Posthear. Br. at 27-28. They point to responses from purchaser *** and purchaser/importer *** indicating that such products include European CDMT grades are ST52, 34MnB5, and 25CRMo4. See CR/PR at II-14.

²¹⁰ *** accounted for ***. Respondents' Posthear. Br. at Exhibit 1 pgs. 27-28; ***, CR/PR at Tables I-20, D-1.

²¹¹ ***. *Calculated from ***, ***.*

²¹² Respondents' Posthear. Br. at Exhibit 1 pg. 27-28; CR/PR at Table I-18; ***, Respondents' Posthear. Br. at Exhibit 17. *** reported *** for the domestic industry during the POI *** and indicated that ***. Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table V-15; CR/PR at D-1 (narratives of *** on the impact of the orders and impact of revocation).

²¹³ See, e.g., Hearing Tr. at 17, (Vore) 28 (Klenovich). Information on the record indicates that CDMT is, regardless of source, primarily customized and made-to-order to customer specifications, based on its intended end-use. Hearing Tr. at 21, 60, 83 83-84 (Hart), 85-86 (Vore). Domestic Producers indicated that they cannot produce CDMT with an outside diameter ranging from 12.5 inches to 13.031 inches, but that these "products constitute a tiny sliver of the U.S. market, which the domestic producers estimate to amount to less than {one} percent." Domestic Producers' Posthear. Br. at 4, Exhibit 2, para. 7 Exhibit 3, para. 9. The record does not indicate that the "specialty" products at issue, such as oil tool products, a proprietary alloy sold to ***, and products sold to ***, relate to this product-size. Domestic Producers also indicated that they currently produce seamless and welded CDMT for hydraulic cylinders and either currently produce, or are able to produce, grades comparable to grades reported by purchasers as not being available from U.S. producers, including grades 34MnB5, 25CRMo4, and ST52. See Domestic Producers' Posthear. Br. at 2-4, Exhibits 2-4.

majority of responding purchasers reported that domestically produced CDMT was either superior or comparable to subject imports from Italy with respect to almost all non-price factors,²¹⁴ and U.S. producers shipped significant volumes of CDMT to each end use sector, accounting for a significant majority of all reported U.S. shipments to each end use sector, indicating their ability to produce CDMT covering a wide range of end uses.²¹⁵ Finally, the record shows that the domestic like product overlapped with subject imports from Italy in terms of customers—including *** and ***—end use sectors, and product types during the POI and POR.²¹⁶

Second, contrary to Italian Respondents’ argument that subject imports from Italy would likely be limited to small volumes of specialty CDMT for oil tools upon revocation, Italian producers, including Dalmine, reported producing and selling a range of CDMT tubing products in a range of sizes, not simply “specialty products” for use in oil tools.²¹⁷ Indeed, during the POR, as in the original investigations, the largest proportion of U.S. shipments of subject

²¹⁴ CR/PR at Table II-20. A majority of purchasers reported that the domestic like product was superior or comparable to subject imports from Italy for all purchasing factors except availability and product range, for which a majority rated the domestic like product inferior to subject imports from Italy. *Id.*

²¹⁵ CR/PR at Tables IV-4-5.

²¹⁶ *** purchased ***. Confidential Staff Report from Original Investigations, EDIS Doc. 791886 at Table V-13. Moreover, in 2022, a significant portion of the domestic industry’s U.S. shipments (135,331 short tons, accounting for 35.7 percent of its total U.S. shipments) were made to the heavy machinery/industrial sector, which also accounted for *** (*** percent) U.S. shipments of subject imports from Italy. CR/PR at Table IV-4. Contrary to Tenaris’s claims that U.S. producers cannot supply certain CDMT products for oil tools, a substantial volume of U.S. shipments were made to the oil and natural gas sector in 2022 (16,525 short tons). *Id.* U.S. producers also reported shipping significant volumes of CDMT of the same product types as subject imports from Italy, including in the category, carbon steel seamless pipe, that accounted for *** of U.S. shipments of subject imports from Italy. CR/PR at Table IV-5.

²¹⁷ Hearing Tr. at 121-122 (Rottoli); CR at Tables IV-54-55.

imports from Italy were made to the machinery/industrial and “other” sectors, while a relatively small portion was shipped to the oil and gas sector.²¹⁸ Nor does the record show that the subject industry in Italy is focused on the oil and gas sector, given that only *** percent of the industry's shipments were made to that sector in 2022.²¹⁹

For all these reasons, we find that there is a sufficient degree of fungibility between and among subject imports from Italy, imports from other subject sources, and the domestic like product, for purposes of cumulation.

Geographic Overlap. In the original investigations, the Commission found that subject imports from each subject country and the domestic like product were generally shipped to the same geographic markets nationwide, including the Northeast, Midwest, Southeast, Central Southwest, Mountains, and Pacific Coast regions.²²⁰

In these reviews, domestic producers reported selling CDMT to all regions in the contiguous United States, as did importers of subject merchandise from each source.²²¹ While Italian Respondents emphasize that most imports from Italy (58.3 percent) under the eight relevant HTSUS statistical reporting numbers entered through the Southern border of entry in 2022,²²² a significant portion of such imports (35.6 percent) also entered from the Eastern border of entry.²²³ Nor did these borders of entry prevent responding importers from selling CDMT from Italy in ***.²²⁴ Thus, the record shows that subject imports from Italy served the same geographic markets as imports from other subject sources and the domestic like product.

²¹⁸ Confidential Staff Report from Original Investigations, EDIS Doc. 791886 at Table II-2. For example, in 2016, *** percent of shipments of subject imports from Italy to distributors were made to the machinery/industrial sector while *** percent of shipments of subject imports from Italy to end-users were made to “other” sectors. On the other hand, only *** percent of shipments of subject imports from Italy to distributors were made to the oil and gas sector and *** percent of shipments of subject imports from Italy to end-users were made to the oil and gas sector. *Id.* During the current POR, the vast majority of U.S. shipments of subject imports from Italy, *** percent, were made to the heavy machinery/industrial sector, with *** made to the oil and gas sector. CR/PR at Table IV-4.

²¹⁹ CR/PR at Table IV-54. A *** of total shipments reported by responding Italian producers were made to the automotive (*** percent) and heavy machinery/industrial (*** percent) sectors while *** was made to the oil and gas sector (*** percent). CR/PR at Table IV-54. U.S. producers reported substantial volumes of shipments to all three of these sectors in 2022. CR/PR at Table IV-4.

²²⁰ *Original Determinations*, USITC Pub. 4755 at 20.

²²¹ CR/PR at Table II-4.

²²² Respondents’ Prehear. Br. at 16.

²²³ CR/PR at Table IV-6.

²²⁴ CR/PR at Tables II-4, IV-6.

Channels of Distribution. In the original investigations, the Commission found the domestic like product and imported subject merchandise shared the same channels of distribution despite some differences in the concentration of sales to distributors and end users, sales in end-use sectors, and types of sales.²²⁵

In the current reviews, Domestic Producers sold a majority of their shipments to distributors (**% percent in 2022) but also sold to end users (**% percent in 2022).²²⁶ Subject imports from China were reportedly sold **%; subject imports from Germany were reportedly sold **%; **% of subject imports from India were reportedly sold to **%; subject imports from Italy were reportedly sold **%; subject imports from South Korea were **% sold to distributors **, while subject imports from Italy and Switzerland were reportedly sold **. ²²⁷

Simultaneous Presence in Market. In the original investigations, the Commission found that the domestic like product and CDMT imported from each subject country were present in the U.S. market throughout the POI.²²⁸

In these reviews, the domestic like product as well as imports under the eight primary HTS statistical reporting numbers for CDMT from China, Germany, India, and Italy were present in all 78 months of the POR, imports of such products from South Korea were present in 76 months, and imports of such products from Switzerland were present in 77 months.²²⁹

²²⁵ *Original Determinations*, USITC Pub. 4755 at 19. The Commission rejected arguments from Benteler and Mannesmann that their shipments of customer-specific products to automotive end users constituted distinct channels of trade, as domestic producers and importers from other subject countries also made shipments directly to users in the automotive market. *Id.* It was also unpersuaded by Mannesmann's argument that its imports were distinct as they were sold pursuant to global frame contracts, indicating that such contracts only applied only to **% of subject imports from Germany and that such contracts were essentially equivalent to long-term contracts, and both U.S. producers and U.S. importers of subject merchandise from other countries reported using a mix of long-term contracts, annual contracts, short-term contracts, and spot sales. *Confidential Views*, EDIS Doc. 791893 at 27; *Original Determinations*, USITC Pub. 4755 at 19.

²²⁶ CR/PR at Table II-3.

²²⁷ CR/PR at Table II-3.

²²⁸ *Original Determinations*, USITC Pub. 4755 at 20.

²²⁹ CR/PR at Table IV-7. Based on official Commerce import statistics using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, categories which may include out-of-scope merchandise. *Id.*

The record in these reviews indicates that there have been no significant changes in the considerations that led the Commission to conclude in the original investigations that there was a reasonable overlap of competition between and among subject imports from China, Germany, India, Italy, South Korea, and Switzerland, and the domestic like product. In particular, the domestic like product and subject imports from each source remain sufficiently fungible, are primarily shipped through the same or similar channels of distribution, overlap in terms of geographic markets, and were simultaneously present in the U.S. market for virtually the entire POR. In light of this, we find that there would likely be a reasonable overlap in competition between and among subject imports from China, Germany, India, Italy, South Korea, and Switzerland and the domestic like product if the orders were revoked.

3. Likely Conditions of Competition

We also find that the record in these reviews does not indicate that there would likely be significant differences in the conditions of competition between subject imports from China, German, India, Italy, South Korea, and Switzerland if the orders were revoked. As discussed in section III.D.1 above, during the original investigations the volume and market share of imports from each subject country were significant, and subject imports from China, India, Italy, and South Korea undersold the domestic like product. The record also indicates that the subject industries in China, Germany, India, Italy, South Korea, and Switzerland have maintained a presence in the U.S. market during the POR; possess significant production capacity, including in some cases excess capacity; and exported significant volumes of CDMT. As discussed in section III.D.2, we have also found that there would likely be a reasonable overlap of competition between and among imports from each subject country, including those from Italy, and the domestic like product if the orders were revoked.

We are unpersuaded by the Italian Respondents' arguments that subject imports from Italy are likely to compete under different conditions of competition than imports from other subject countries in the event of revocation.²³⁰

We disagree that *** would prevent significant volumes of subject imports from Italy from competing under similar conditions of competition with subject imports from the other countries, as argued by the Italian Respondents.²³¹ While Dalmine shipped *** of its exports of subject

²³⁰ Respondents' Prehear. Br. at 17.

²³¹ Respondents' Prehear. Br. at 8-11, 17; Respondents' Posthear. Br. at 3-4 and Exhibit 1 pgs 3-7, 14, 25, 31, 36.

merchandise from Italy to *** *via* Tenaris for the production of *** in 2022,²³² a *** of subject imports from Italy during the period examined in the original investigations, *** percent, were sourced from Metalfer, a *** producer than Dalmine in 2016 and in 2022.²³³ Furthermore, if the orders were revoked, *** loss of *** as a customer would not likely prevent it from importing significant volumes of CDMT from Dalmine in Italy for sale to other customers. During the original investigations, none of *** approximately *** short tons of subject imports from Italy in 2016 were shipped to ***, which was exclusively supplied by the domestic industry at the time.²³⁴ During the POR, *** shipped *** percent of its subject imports from Italy to purchasers other than *** in 2022.²³⁵

We are also unpersuaded by the Italian Respondents' argument that subject imports from Italy would likely be limited to certain customized or "specialized" CDMT, such as seamless CDMT used in oil tool products²³⁶ and certain European CDMT grades, that would not

²³² *Calculated from* ***, CR/PR at Table IV-30.

²³³ *See* Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table VII-15; CR/PR at IV-30. Italian Respondents contend that subject imports from Metalfer would likely be limited after revocation because its ***, would likely not return to purchasing significant volumes of CDMT from Italy, as it did during the original POI. Respondents' Posthear. Br. at 27-28. As noted above, during the original investigations, *** reported *** for the domestic industry ***, and during the current reviews, it reported that if the orders were revoked it would increase its purchases of subject merchandise. Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table V-15; CR/PR at D-1 (narratives of *** on the impact of the orders and impact of revocation).

²³⁴ *Calculated from* Confidential Report from Original Investigations at Tables IV-1-2, V-13.

²³⁵ *Calculated from* ***, *** Importer Questionnaire Response at II-8a. In 2022, Dalmine was only the *** largest responding subject producer in Italy, accounting for *** percent of reported CDMT production in Italy in 2022. CR/PR at Table IV-30. Although Dalmine accounted for *** percent of reported exports of subject merchandise from Italy in 2022, *id.*, nothing would prevent other Italian producers, such as Metalfer, from exporting significant volumes of CDMT to the U.S. market after revocation, as they did during the original investigations. Confidential Report from the Original Investigations, EDIS Doc. 791886 at Table VII-15.

²³⁶ Italian Respondents assert that U.S. demand for welded CDMT used in oil tool products has decreased and is expected to decrease in the foreseeable future given the proliferation of hot finished tubing as a viable substitute used by its "other" U.S. customers. Respondents' Posthear. Br. at 8; Respondents' Posthear. Br. at Exhibit 1 pg. 31. Domestic Producers disagree with this contention, citing to testimony indicating that any shift to hot finished products does not indicate a trend, rather is indicative of that market "flexing" back and forth between products based on "various factors." Domestic Producers' Posthear. Br. at 7-8 (citing Hearing Tr. at 51-52 (Vore)). However, for the reasons discussed above, Italian producers have the capability to produce a wide range of CDMT products and not just CDMT used in oil and natural gas products, which accounted for *** percent of U.S. shipments of subject imports from Italy in 2022 and made up the smallest share (*** percent) of total shipments of CDMT by Italian producers in 2022. CR/PR at Tables IV-4, IV-54.

compete with the domestic industry or subject imports from other countries.²³⁷ The record does not support the Italian Respondents' assumption that the current product mix of subject imports from Italy, under the disciplining effect of the order, would persist after revocation. As discussed in section III.D.2 above, we have found that subject imports from Italy are fungible with imports from other subject countries and the domestic like product. We also find in section IV.B.3 below that there is a moderate-to-high degree of substitutability between cumulated subject imports, including those from Italy, and the domestic like product. Given that Italian subject producers, including Dalmine, reported selling a range of CDMT products during the POR, not just "specialty products" for use in oil tools, nothing would prevent them from exporting a range of CDMT products to the United States after revocation.²³⁸

We also disagree with Italian Respondents' contention that subject producers in Italy are less export-oriented than subject producers in the other subject countries because of their alleged focus on serving home and EU market customers.²³⁹ As an initial matter, responding Italian subject producers reported exporting from *** to *** percent of their total shipments during the annual periods covered by the POR, reflecting a focus on exports rather than on home market customers.²⁴⁰ Furthermore, responding Italian subject producers reported that *** to *** percent of their exports were made to markets outside the EU during the annual periods covered by the POR, reflecting a significant degree of export

²³⁷ Respondents' Prehear. Br. at 13, 15-17, 30; Respondents' Posthear. Br. at 6 and Exhibit 1 pgs. 31-34.

²³⁸ Hearing Tr. at 121-122 (Rottoli). During the original POI, the largest proportion of U.S. shipments of subject imports from Italy were made to the machinery/industrial and "other" sectors while only a small portion was shipped to the oil and gas sector. Confidential Staff Report from Original Investigations, EDIS Doc. 791886 at Table II-2. For example, in 2016 *** percent of shipments of subject imports from Italy to distributors were made to the machinery/industrial sector while *** percent of shipments of subject imports from Italy to end-users were made to "other" sectors. On the other hand, only *** percent of shipments of subject imports from Italy to distributors were made to the oil and gas sector and *** percent of shipments of subject imports from Italy to end-users were made to the oil and gas sector. *Id.* Likewise, during the current POR, *** of total shipments reported by Italian producers were made to the automotive (*** percent) and heavy machinery/industrial (*** percent) sectors while *** was made to the oil and gas sector (*** percent). CR/PR at Table IV-54.

²³⁹ Respondents' Prehear. Br. at 4-7, 10-14, 17, 24-25; Respondents' Posthear. Br. at 4-5, 8, Exhibit 1 pgs. 9-10, 16.

²⁴⁰ CR/PR at Table IV-36.

orientation towards markets other than the EU.²⁴¹ Indeed, the share of responding subject Italian producers' exports to the EU relative to their total exports declined while their exports to Canada and other third country markets increased during the POR, both in terms of volume and relative to total exports, indicating an increased focus on markets outside of the EU, including ***, during the period.²⁴²

We are also unpersuaded that the *** of the subject industry in Italy compared to that of other subject industries would prevent subject imports from Italy from competing under similar conditions of competition as imports from other subject countries. Responding subject producers in Italy reported substantial excess capacity of *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year, which is *** that reported by responding subject producers in South Korea or

²⁴¹ CR/PR at Tables IV-36-37. The purported lack of third-country trade barriers and preferential access to the EU market do not distinguish subject imports from Italy, as Italian Respondents argue. Respondents' Prehear. Br. at 21. Neither German nor Swiss subject producers face third-country trade barriers and German CDMT producers also have privileged access to the EU market. CR/PR at Table IV-56.

Nor does the record support the Italian Respondents' assertion that Italian subject producers have no interest in the U.S. market. See Respondents' Prehearing Br. at 5-6, 12, 18. Subject imports from Italy maintained a continuous presence in the U.S. market during the POR, thereby maintaining U.S. distribution networks and customers. CR/PR at Table IV-1. As explained above, ***, specifically indicated that it would increase orders of subject imports if the orders were revoked. CR/PR at D-1. Indeed, the relatively high prices in the U.S. market compared to those in third country markets and the Italian home market indicate that subject Italian producers would have an economic incentive to increase their exports to the U.S. market in the event of revocation. As indicated above, the AUVs of responding Italian producers' and resellers' exports to the United States were *** percent higher than the AUVs of their exports to all non-U.S. destination markets in 2022 and were higher than the AUVs reported in all third country markets as well as their home market. CR/PR at Tables IV-36-37. That the third-country affiliates of Italian subject producers do not export to the U.S. market is immaterial because the focus of our analysis is the subject industry in Italy. See Respondents' Prehear. Br. at 12-13; Respondents' Posthear. Br. at 8.

²⁴² *** reported exporting to Canada while several Italian subject producers reported Western Hemisphere countries as their primary export markets in the "other" category, including *** and ***. See Foreign Producer Questionnaire Responses of *** at II-13; ***. The primary "other" destination export markets identified by responding Italian firms include ***. CR/PR at IV-80 and Table IV-37. Given the declining share of the responding Italian producers' total shipments made to the EU over the POR, even as EU demand was reportedly "strong" and European CDMT supplies allegedly decreased, see Respondents' Prehear Br. at 24; Respondents' Posthear. Br. at 11, Exhibit 1, pgs. 29-30, the future increases in EU demand projected by the Italian Respondents would not likely prevent subject producers from increasing their exports to the U.S. market after revocation. Respondents' Prehear. Br. at 24, 25.

Switzerland.²⁴³ Consequently, subject producers in Italy are no less capable of increasing their exports to the United States after revocation than producers in other subject countries.

We also find unpersuasive Italian Respondents' arguments that the section 232 TRQ on subject imports from Italy would prevent significant volumes of subject imports Italy from competing under similar conditions of competition as imports from other subject countries after revocation.²⁴⁴ As an initial matter, the TRQ on subject imports from Italy would not limit subject imports from Italy to "negligible" levels, as Italian Respondents contend.²⁴⁵ The TRQ is not an absolute cap on the volume of subject imports from Italy, but rather permits subject imports from Italy in excess of the TRQ with payment of the 25 percent tariff.²⁴⁶ Furthermore, the TRQ applicable to subject imports from Italy under section 232 does not distinguish such imports from imports from other subject countries, which are all subject to section 232 measures.²⁴⁷ Accordingly, we find that subject imports from Italy would not likely compete under different conditions of competition after revocation by virtue of the section 232 TRQ applicable to such imports.

In sum, based on the record of these reviews, we do not find differences in the likely conditions of competition that would warrant exercising our discretion to not cumulate subject imports from China, Germany, India, Italy, South Korea, and Switzerland.

²⁴³ *Calculated from* CR/PR at Tables I-22, IV-36, C-1. When accounting for Italian producers' end-of-period inventories of CDMT, which increased irregularly during the POR, their inventories and excess capacity were equivalent to *** percent of apparent U.S. consumption in 2022. *Calculated from* CR/PR at Tables I-21, IV-36.

²⁴⁴ Respondents Prehear. Br. at 5, 17-18, 26-29.

²⁴⁵ Respondents Prehear. Br. at 5, 17-18, 26-29.

²⁴⁶ CR/PR at Table I-15.

²⁴⁷ Subject imports from Germany are subject to a TRQ under section 232, like subject imports from Italy, while subject imports from South Korea are subject to an absolute quota and subject imports from China, India, and Switzerland are subject to a 25 percent tariff. CR/PR at I-22-23, Table I-15. As previously noted, the applicable quota with respect to South Korea is 9,797 short tons, which is equivalent to *** percent of apparent U.S. consumption in 2022. *See* CR/PR at I-22-23 and Tables I-15, C-1. Commissioner Schmidlein notes that she agrees that the absolute quota applicable to South Korea is not a different condition of competition but does not rely on its equivalent percentage of apparent consumption for 2022 as the basis for that finding. *See* Dissenting Views of Commissioner Rhonda K. Schmidlein, *Circular Welded Pipe and Tube from Brazil, India, Mexico, South Korea, Taiwan, Thailand, and Turkey*, Inv. Nos. 701-TA-253 and 731-TA-132, 252, 271, 273, 532-534, and 536 (Fifth Review), USITC Pub. 5481 (Dec. 2023) at 75; *see also* Dissenting Views of Commissioner Rhonda K. Schmidlein and Randolph J. Stayin, *Cold-Rolled Steel Flat Products from Brazil, China, India, Japan, South Korea, and the United Kingdom*, Inv. Nos. 701-TA-540-543 and 731-TA-1283-1287 and 1290 (Review), USITC Pub. 5339 (Aug. 2022) at 75.

E. Conclusion

In sum, we determine that subject imports from China, Germany, India, Italy, South Korea, and Switzerland, considered individually, are not likely to have no discernible adverse impact on the domestic industry in the event of revocation. We also find that there would likely be a reasonable overlap of competition between and among subject imports from each country and the domestic like product if the orders were revoked. Finally, we find that subject imports from each subject country would be likely to compete under similar conditions of competition upon revocation of the orders. Accordingly, we exercise our discretion to cumulate subject imports from China, Germany, India, Italy, South Korea, and Switzerland for purposes of our analysis in these reviews.²⁴⁸

IV. Revocation of the Antidumping and Countervailing Duty Orders Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time

A. Legal Standards

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”²⁴⁹ The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”²⁵⁰ Thus, the likelihood

²⁴⁸ Italian respondents only present arguments concerning the likely volume, price effects, and impact of subject imports from Italy if the relevant order were revoked. We do not find these arguments particularly instructive for our analysis of the likely volume, price effects, and impact of cumulated subject imports in the event of revocation.

²⁴⁹ 19 U.S.C. § 1675a(a).

²⁵⁰ SAA at 883–84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

standard is prospective in nature.²⁵¹ The CIT has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.²⁵²

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”²⁵³ According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”²⁵⁴

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”²⁵⁵ It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce

²⁵¹ While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

²⁵² See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); *Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

²⁵³ 19 U.S.C. § 1675a(a)(5).

²⁵⁴ SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

²⁵⁵ 19 U.S.C. § 1675a(a)(1).

regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).²⁵⁶ The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission's determination.²⁵⁷

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.²⁵⁸ In doing so, the Commission must consider "all relevant economic factors," including four enumerated factors: (1) any likely increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) the potential for product shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.²⁵⁹

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.²⁶⁰

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth,

²⁵⁶ 19 U.S.C. § 1675a(a)(1). Commerce has not made any duty absorption findings since the imposition of the orders. CR/PR at I-12, n.17.

²⁵⁷ 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

²⁵⁸ 19 U.S.C. § 1675a(a)(2).

²⁵⁹ 19 U.S.C. § 1675a(a)(2)(A–D).

²⁶⁰ See 19 U.S.C. § 1675a(a)(3). The SAA states that "{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices." SAA at 886.

ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.²⁶¹ All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.²⁶²

B. Conditions of Competition and the Business Cycle

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked or suspended investigation is terminated, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”²⁶³ The following conditions of competition inform our determinations.

1. Demand Conditions

Original Investigations. The Commission found that demand for CDMT depended on overall economic growth and demand in individual downstream sectors and observed that economic growth in certain important individual sectors (*i.e.*, agricultural vehicles, machinery, U.S. crude oil, natural gas, and automotive production) declined overall during the POI.²⁶⁴ Majorities of reporting U.S. producers, importers, and purchasers reported that U.S. demand for CDMT had declined or fluctuated over the POI.²⁶⁵ Apparent U.S. consumption of CDMT

²⁶¹ 19 U.S.C. § 1675a(a)(4).

²⁶² The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, the Commission “considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

²⁶³ 19 U.S.C. § 1675a(a)(4).

²⁶⁴ *Original Determination*, USITC Pub. 4755 at 24. The Commission observed that CDMT was used in the production of products incorporated in a variety of downstream products such as the automotive, trucking, aviation, hydraulic, construction, agricultural, and drilling industries. *Id.*

²⁶⁵ *Original Determination*, USITC Pub. 4755 at 24.

declined in each full year of the POI, although it was higher in interim 2017 than interim 2016.²⁶⁶

Current Reviews. Demand for CDMT continues to be driven by demand for U.S.-produced downstream products, including agricultural vehicles, machinery, U.S. crude oil, natural gas, and automobiles.²⁶⁷ Demand for many of these downstream products, including agricultural vehicles, machinery, U.S. crude oil, and natural gas, increased irregularly during the POR, while automotive production declined.²⁶⁸

Most U.S. producers and a plurality of importers reported that demand for CDMT in the U.S. market fluctuated up since January 1, 2017, while a majority of purchasers reported that demand steadily increased or fluctuated up.²⁶⁹ In terms of anticipated demand, equal numbers of U.S. producers (two) reported anticipating that U.S. demand for CDMT will fluctuate up, fluctuate down, or remain the same. A plurality of importers and a large majority of foreign producers reported that they do not anticipate that demand for CDMT in the U.S. market will change, while more purchasers reported expecting that demand will steadily increase or fluctuate up (seven) than not change (five) or fluctuate down or steadily decrease (five).²⁷⁰

Apparent U.S. consumption decreased irregularly by *** percent from 2017 to 2022, increasing from *** short tons in 2017 to *** short tons in 2018, decreasing to *** short tons in 2019 and *** short tons in 2020, before increasing to *** short tons in 2021 and *** short tons in 2022; it was lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.²⁷¹

2. Supply Conditions

Original Investigations. While the domestic industry was the largest supplier of CDMT to the U.S. market, its share of apparent U.S. consumption decreased steadily during each full year of the POI.²⁷² The Commission found that the domestic industry's annual production

²⁶⁶ *Original Determination*, USITC Pub. 4755 at 25. Apparent U.S. consumption declined from 558,573 short tons in 2014 to 473,923 short tons in 2015 and 445,089 short tons in 2016 and was higher in interim 2017 (255,358 short tons) than in interim 2016 (227,613 short tons). *Id.*

²⁶⁷ CR/PR at II-16.

²⁶⁸ CR/PR at Figures II-1-4, Tables II-6-9.

²⁶⁹ CR/PR at Table II-10.

²⁷⁰ CR/PR at Table II-12.

²⁷¹ CR/PR at Tables I-21, C-1.

²⁷² *Original Determinations*, USITC Pub. 4755 at 25. The domestic industry's market share decreased from 77.4 percent in 2014, to 75.1 percent in 2015, and 71.6 percent in 2016. Its market share was higher in interim 2017 at 74.7 percent than in interim 2016 at 74.1 percent. *Id.*

capacity had increased and remained above apparent U.S. consumption throughout the POI and that despite some differences in product mix that may have affected lead times for certain products, the domestic industry still had the ability to manufacture and supply such products.²⁷³

Cumulated subject imports were the second largest source of supply of CDMT to the U.S. market during the POI as their share of apparent U.S. consumption increased throughout the POI.²⁷⁴ Nonsubject imports were the smallest source of supply over the POI and their share of apparent U.S. consumption increased from 2014 through 2016.²⁷⁵ Japan, Romania, Mexico, Argentina, and Taiwan were the largest individual sources of nonsubject CDMT over the POI.²⁷⁶

Current Reviews. During the POR, the domestic industry continued to be the largest supplier to the U.S. market, and its share of apparent U.S. consumption increased irregularly during the POR.²⁷⁷ Specifically, the industry's share of apparent U.S. consumption increased *** percentage points during the POR, from *** percent in 2017, to *** percent in 2018, *** percent in 2019, and *** percent in 2020, decreased to *** percent in 2021, and then increased to *** percent in 2022; it was higher in interim 2023, at *** percent, than in interim 2022, at *** percent.²⁷⁸

The domestic industry's CDMT production capacity decreased irregularly from 575,200 short tons in 2017 to 535,029 short tons in 2022.²⁷⁹ The industry experienced multiple supply disruptions during the POR, including shutdowns ***, as well as production curtailments ***.²⁸⁰ ***

²⁷³ *Original Determinations*, USITC Pub. 4755 at 25.

²⁷⁴ *Confidential Views*, EDIS Doc. 791893 at 37. The share of apparent U.S. consumption by subject imports increased throughout the POI from *** percent in 2014, to *** percent in 2015, and *** percent in 2016; it was higher in interim 2017 (***) percent) than in interim 2016 (***) percent). *Id.*

²⁷⁵ *Confidential Views*, EDIS Doc. 791893 at 37. The share of apparent U.S. consumption by nonsubject imports increased from *** percent in 2014, to *** percent in 2015, and *** percent in 2016, and was lower in interim 2017 (***) percent) than in interim 2016 (***) percent). *Id.*

²⁷⁶ *Original Determinations*, USITC Pub. 4755 at 26.

²⁷⁷ CR/PR at Tables I-21, C-1.

²⁷⁸ CR/PR at Tables I-21, C-1.

²⁷⁹ CR/PR at Tables II-5, III-5, C-1. Thus, the domestic industry's CDMT production capacity decreased 7.0 percent from 2017 to 2022. *Id.*

²⁸⁰ CR/PR at Tables III-1-2.

***.²⁸¹ According to Domestic Producers, these supply issues were not substantial but rather the temporary result of the COVID-19 pandemic, and subsequently abated during the 2020 through 2022 period.²⁸² They argue that the temporary imbalance between supply and demand that resulted, as customers' orders rebounded more rapidly than the industry's ability to supply CDMT, caused many customers to be placed on "controlled order entry" and to experience increased lead times.²⁸³

Cumulated subject imports were the second largest source of supply throughout the POR, and their share of apparent U.S. consumption declined irregularly during the period. Specifically, the cumulated subject imports' share of apparent U.S. consumption declined from *** percent in 2017, to *** percent in 2018, and *** percent in 2019, increased to *** percent in 2020 and *** percent in 2021, and then decreased to *** percent in 2022; it was lower in interim 2023 at *** percent than in interim 2022 at *** percent.²⁸⁴

Nonsubject imports were the smallest source of supply throughout the POR, and fluctuated within a narrow band during the POR. Their share of apparent U.S. consumption increased from *** percent in 2017, to *** percent in 2018, and *** percent in 2019, declined to *** percent in 2020 and *** percent in 2021, and then increased to *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent.²⁸⁵ The largest sources of nonsubject imports during the POR were Canada, Japan, Mexico, and Spain.²⁸⁶

3. Substitutability and Other Conditions

Original Investigations. The Commission found a moderate-to-high degree of substitutability between the domestic like product and subject CDMT and that price played an important role in purchasing decisions.²⁸⁷

²⁸¹ CR/PR at Tables III-2-3.

²⁸² Domestic Producers' Prehear. Br. at 58-59; *see also* CR/PR at Table III-3.

²⁸³ Domestic Producers' Prehear. Br. at 59-60.

²⁸⁴ CR/PR at Tables I-21, C-1. Accordingly, cumulated subject imports' share of apparent U.S. consumption declined *** percentage points from 2017 to 2022. *Id.*

²⁸⁵ CR/PR at Tables I-21, C-1. Thus, nonsubject imports' share of apparent U.S. consumption declined *** percentage points from 2017 to 2022. *Id.*

²⁸⁶ CR/PR at II-12.

²⁸⁷ *Original Determinations*, USITC Pub. 4755 at 26. The Commission observed that while CDMT encompassed a broad variety of products with different dimensions and specifications catered to particular end uses, for CDMT with similar dimensions and specifications, there was generally a high degree of substitutability between domestically produced CDMT and CDMT imported from subject countries, although certification requirements for certain CDMT may result in more moderate substitutability for certain products. *Id.*

The vast majority of U.S. producers reported that subject imports and the domestic like product were “always” interchangeable while all reporting importers and purchasers responded that the domestic like product and imports from each subject country were at least “frequently” or “sometimes” interchangeable.²⁸⁸ All but one of the reporting U.S. producers reported that non-price differences were “sometimes” or “never” significant in comparisons between and among the domestic like product and subject imports from each of the six subject countries.²⁸⁹ However, U.S. importers and purchasers provided mixed responses as to the significance of non-price differences between the domestic like product and subject imports.²⁹⁰

Purchasers identified, price, quality, and lead time/delivery as the three most important factors involved in purchasing decisions.²⁹¹ The Commission observed that both U.S and foreign producers manufacture CDMT to the same industry standards and specifications, such as the STN or the EN specifications.²⁹² It also found that supplier certifications for certain types of CDMT were important, as twenty-five of 31 purchasers reported that they required suppliers to become certified to provide CDMT, and all responding purchasers reported that quality meeting industry standards was “very” important in CDMT purchasing decisions.²⁹³

²⁸⁸ *Original Determinations*, USITC Pub. 4755 at 26.

²⁸⁹ *Original Determinations*, USITC Pub. 4755 at 26.

²⁹⁰ *Original Determinations*, USITC Pub. 4755 at 26-27. In comparisons of subject imports from the different subject countries, majorities or pluralities of U.S. importers reported that non-price differences were “frequently” significant in four comparisons, and “sometimes” or “never” significant in eight comparisons, while majorities or pluralities of U.S. purchasers reported that non-price differences were “always” or “frequently” significant in one comparison, and “sometimes” or “never” significant in 13 comparisons. *Id.*

²⁹¹ *Original Determinations*, USITC Pub. 4755 at 27.

²⁹² *Original Determinations*, USITC Pub. 4755 at 27.

²⁹³ *Original Determinations*, USITC Pub. 4755 at 28. The Commission noted that in an example of such certification in the automotive and agricultural end-use sectors, many firms adhere to the Production Part Approval Process, which is a standardized approval process that ensures engineering design record and specification requirements are met. *Id.* It rejected respondents’ argument that certification requirements attenuated subject import competition by making it difficult to switch suppliers. As the Commission explained, petitioners had noted that the domestic industry had the ability to produce and seek certifications for all types of CDMT in the U.S. market, consistent with the industry’s reporting of shipments to all end user sectors. *Id.* The Commission also found that purchaser responses concerning the substitutability of domestic and subject CDMT indicated that any lack of domestic industry certification was due not to any inability to produce certain products but rather the diverse product mix of CDMT. *Id.*

The Commission found that hot-rolled steel sheet, bar, or billet were key raw materials used for CDMT production.²⁹⁴ Prices for hot-rolled steel fluctuated from January 2014 to June 2017, ending the period lower than where they started.²⁹⁵ The Commission also highlighted that Petitioners reported that raw material prices and prices for CDMT were directly correlated and followed similar trends.²⁹⁶

Current Reviews. We find that there remains a moderate-to-high degree of substitutability between subject imports and domestically produced CDMT.²⁹⁷ As discussed in section III.D.2 above, majorities of responding domestic producers, importers, and purchasers reported that CDMT from the United States is always or frequently interchangeable with CDMT from each subject country, with the exception of importers' responses regarding subject imports from Italy and Germany.²⁹⁸ An equal number of importers reported that subject imports from Germany are always, frequently, or sometimes interchangeable with the domestic like product (one), while two importers reported that subject imports from Germany are never interchangeable.²⁹⁹ An equal number of importers reported that subject imports from Italy are frequently, sometimes, or never interchangeable with the domestic like product (two), while one importer responded that subject imports from Italy are always interchangeable.³⁰⁰

The vast majority of U.S. producers reported that differences other than price are never significant when comparing the domestic like product with subject imports from all subject countries, with all reporting U.S. producers reporting that such differences are either sometimes or never significant.³⁰¹ A majority of purchasers reported that such differences are sometimes or never significant between the domestic like product and subject imports from all subject countries except Italy and China; pluralities of purchasers reported that such differences between the domestic like product and subject imports from Italy and China were frequently significant.³⁰²

²⁹⁴ *Original Determinations*, USITC Pub. 4755 at 28. Raw materials as a share of cost of goods sold ("COGS") declined from 55.8 percent of COGS in 2014, to 49.6 percent in 2015, and 48.1 percent in 2016. *Id.* Raw materials as a ratio to COGS were higher in interim 2017 at 52.2 percent than in interim 2016 at 46.1 percent. *Id.* at 28 n.153.

²⁹⁵ *Original Determinations*, USITC Pub. 4755 at 28.

²⁹⁶ *Original Determinations*, USITC Pub. 4755 at 28.

²⁹⁷ CR/PR at II-25.

²⁹⁸ CR/PR at Tables II-21-23.

²⁹⁹ CR/PR at Table II-22.

³⁰⁰ CR/PR at Table II-22.

³⁰¹ CR/PR at Table II-24.

³⁰² CR/PR at Table II-26.

Importers' responses were more mixed. A majority of importers reported that differences other than price are sometimes or never significant between the domestic like product and subject imports from Germany, and an equal number of importers reported that such differences are always or frequently significant as reported that such differences were only sometimes significant between the domestic like product and subject imports from China and India.³⁰³ On the other hand, a majority of responding importers reported that such differences are always or frequently significant between the domestic like product and subject imports from Italy, South Korea, and Switzerland.³⁰⁴

A majority of purchasers reported that domestically produced CDMT was either superior or comparable to CDMT from each of the subject countries across 15 purchasing factors with few exceptions, primarily relating to price, product range, and availability.³⁰⁵ A large majority of responding purchasers with knowledge indicated that subject imports from each source "always" or "usually" meet minimum quality standards.³⁰⁶

As also discussed above, U.S. producers reported substantial volumes of shipments of all classes of CDMT in 2022, with carbon steel welded pipe accounting for the vast majority of their total U.S. shipments that year (***) percent), followed by carbon steel seamless pipe, and

³⁰³ CR/PR at Table II-26.

³⁰⁴ CR/PR at Table II-26.

³⁰⁵ CR/PR at Table II-20. An equal number of purchasers rated the domestic like product as inferior, comparable, and superior to subject imports from China with respect to product range; an equal number of purchasers rated the domestic like product as inferior and comparable to subject imports from Germany with respect to product range; a majority of purchasers reported that domestically produced CDMT was inferior in terms of availability and product range compared to subject imports from Italy; a majority of purchasers reported that domestically produced CDMT was inferior in terms of price compared to subject imports from China, India, South Korea, and Switzerland (meaning that domestically produced CDMT is priced higher than subject imports from each country); and the only purchaser of CDMT from Switzerland reported that domestically produced CDMT was inferior in terms of availability, packaging, minimum quantity requirements, and product range compared to subject imports from Switzerland. *Id.*

³⁰⁶ CR/PR at Table II-17.

alloy steel seamless pipe.³⁰⁷ A majority of U.S. shipments of imports from cumulated subject sources also consisted of carbon steel welded pipe (***) percent).³⁰⁸

There were also substantial volumes of U.S. shipments of domestically produced CDMT in each end-use category in 2022, while U.S. shipments of CDMT from cumulated subject sources were also reported across all end-use categories.³⁰⁹ There was significant overlap between U.S. shipments of domestically produced CDMT and cumulated subject imports with respect to the automotive and heavy machinery/industrial sectors.³¹⁰ Specifically, 40.1 percent of U.S. shipments by the domestic industry were made to the automotive sector while 35.7 percent of their shipments were made to the heavy machinery/industrial sector.³¹¹ The share of U.S. shipments by cumulated subject imports to the “other” end use sector was *** percent, followed by the heavy machinery/industrial sector (***) percent) and the automotive sector (***) percent).³¹²

We also find that price is an important factor in purchasing decisions. Price was most frequently identified by responding purchasers as among their top three factors in purchasing decisions (23 firms) followed by quantity (20 firms) and delivery/lead time (13 firms).³¹³ Price was also one of the factors most frequently identified by responding purchasers as very important to their purchasing decisions. Nineteen purchasers identified price as very important, while 22 firms reported reliability of supply and quality meets industry standards, 21

³⁰⁷ CR/PR at Table IV-5 (indicating that the domestic industry shipped *** short tons of carbon steel welded pipe, *** short tons of carbon steel seamless pipe, and *** short tons of alloy steel seamless pipe while imports of subject merchandise from Italy shipped *** short tons of carbon steel welded pipe, *** short tons of carbon steel seamless pipe, and *** short tons of alloy steel seamless pipe).

³⁰⁸ CR/PR at Table IV-5. The majority of U.S. shipments of imports from India, South Korea, and Switzerland were of carbon steel welded pipe while the overwhelming majority of U.S. shipments of CDMT imports from China, Germany, and Italy in 2022 were of carbon steel seamless pipe.

³⁰⁹ CR/PR at Tables IV-4-5, IV-54. The domestic industry shipped 56,691 short tons to the agriculture sector accounting for *** percent of all U.S. shipments, 152,009 short tons to the automotive sector accounting for *** percent of all U.S. shipments, 135,331 short tons to the heavy machinery/industrial sector accounting for *** percent of all U.S. shipments, *** short tons to the oil and gas sector accounting for *** percent of all U.S. shipments, and 18,816 short tons to the other end uses sector accounting for *** percent of all U.S. shipments. *Id.* at Table IV-4.

³¹⁰ CR/PR at Table IV-4.

³¹¹ CR/PR at Table IV-4.

³¹² CR/PR at Table IV-4. The domestic like product and imports from all subject countries were present in the automotive end-use sector, while imports from four subject countries (all but Switzerland) were present in the heavy machinery/industrial sector. *Id.*

³¹³ CR/PR at Table II-15.

firms reported product consistency, and 20 firms reported availability and delivery time as very important.³¹⁴

The record indicates that CDMT is primarily produced-to-order and customized to a customers' particular specifications.³¹⁵ U.S. producers reported that 89.4 percent of their commercial shipments were produced-to-order, with lead times averaging 55 days, with the remaining 10.6 percent of their commercial shipments coming from inventories, with lead times averaging 10 days. Importers reported that 55.8 percent of their commercial shipments were produced-to-order, with lead times averaging 123 days; 40 percent were from U.S. inventories, with lead times averaging 5 days; and 4.2 percent were from foreign inventories, with lead times averaging 90 days.³¹⁶

The primary raw material for welded CDMT is hot-rolled steel sheet while the primary raw material for seamless CDMT is steel bar or billet.³¹⁷ Raw materials accounted for 54.7 percent of the domestic industry's COGS in 2017, 59.7 percent in 2018, 56.1 percent in 2019, 49.7 percent in 2020, 66.4 percent in 2021, and 66.7 percent in 2022.³¹⁸ U.S. producers' raw material costs as a share of COGS was lower at 57.4 percent in interim 2023 than in interim 2022, at 68.6 percent.³¹⁹ Monthly prices of hot-rolled steel coil, as published on ***, increased irregularly from January 2017 to June 2023 by *** percent.³²⁰ Energy costs are another component of CDMT production costs. During the POR, the price of electricity from natural gas decreased irregularly by 38.1 percent while retail electricity prices, as published by the U.S. Energy Information Administration ("EIA"), increased irregularly by 25.1 percent.³²¹

Effective September 1, 2019, CDMT originating in China became subject to an additional 15 percent *ad valorem* duty under section 301 of the Trade Act of 1974, as amended ("section

³¹⁴ CR/PR at Table II-16.

³¹⁵ Hearing Tr. at 17 (Vore), 28 (Klenovich). Information on the record indicates that CDMT is, regardless of source, primarily customized and made-to-order to customer specifications, based on its intended end-use. Hearing Tr. at 21, 60, 83-84 (Hart), 85-86 (Vore).

³¹⁶ CR/PR at II-28.

³¹⁷ CR/PR at III-39. Tubing hollows, an intermediate product, can be used to produce either welded or seamless CDMT. *Id.*

³¹⁸ CR/PR at Table III-12.

³¹⁹ CR/PR at Table III-12.

³²⁰ CR/PR at Table V-1, Figure V-1.

³²¹ CR/PR Tables V-2-3, Figure V-2.

301 tariffs”).³²² Effective February 14, 2020, Section 301 tariffs on CDMT from China were reduced to 7.5 percent *ad valorem*.³²³

Effective March 23, 2018, CDMT originating in China, India, and Switzerland became subject to an additional 25 percent *ad valorem* tariff under section 232.³²⁴ Effective from January 1, 2022 through December 31, 2025, CDMT originating in EU member countries, including Germany and Italy, is subject to TRQs under section 232, which permitted in-quota imports of 43,097 short tons of CDMT and out-of-scope steel products from Germany and 12,775 short tons of such products from Italy in 2022,³²⁵ with 25 percent duties on out-of-quota imports.³²⁶ ³²⁷ Since June 1, 2019, CDMT originating in South Korea has been subject to an absolute annual quota under section 232, which permitted imports of 9,797 short tons of imports of CDMT and out-of-scope merchandise in 2022.³²⁸

A slim majority of firms reported that section 232 measures had an impact on the U.S. CDMT market in 2022.³²⁹ Of the firms that reported that 232 measures had an impact on the U.S. market, a majority of responding U.S. producers and purchasers reported that Section 232 measures had no impact on the supply of U.S. produced CDMT, while a majority of importers reported the 232 measures increased supply of U.S. produced CDMT.³³⁰ The majority of U.S. producers, importers, and purchasers reported that Section 232 measures caused the supply of imported CDMT to decrease and CDMT prices to increase.³³¹ The responses regarding the impact on U.S. demand were mixed.³³²

During the POR, *** percent of the domestic industry’s commercial U.S. shipments were sold via annual contracts while *** percent were sold through short-term contracts, *** percent through long-term contracts, and *** percent through spot sales.³³³ Three of

³²² CR/PR at I-22.

³²³ CR/PR at I-22.

³²⁴ CR/PR at I-22.

³²⁵ CR/PR at Table I-15.

³²⁶ CR/PR at I-23 & n.28, Table I-15.

³²⁷ The TRQ is administered on a quarterly basis with each quarter having an initial limit of 25 percent of the annual quota limit. CR/PR at I-28. Unused TRQ amounts from the first quarter of the year are combined into the third quarter while unused TRQ from the second quarter of the year will be combined into the fourth quarter according to the quantity determined by Commerce. *Id.*

³²⁸ CR/PR at Table I-15.

³²⁹ CR/PR at II-3.

³³⁰ CR/PR at Table II-2.

³³¹ CR/PR at Table II-2.

³³² CR/PR at Table II-2.

³³³ CR/PR at Table V-5.

five U.S. producers reported that prices in their annual contracts are indexed to published raw material prices using indices such CRU and AMM.³³⁴

Supplier certification requirements are prevalent in the U.S. CDMT market, with 19 of 23 responding purchasers reporting that they require their suppliers to undergo a certification or qualification process which can reportedly take as little as three days or as much as one year to complete.³³⁵ However, most purchasers reported that such processes take between 90 to 180 days.³³⁶

C. Likely Volume of Cumulated Subject Imports

1. The Original Investigations

The Commission found that the volume of cumulated subject imports was significant, both in absolute terms and relative to apparent U.S. consumption.³³⁷ It found that cumulated subject imports had a significant presence in the U.S. market throughout the POI.³³⁸ The Commission also found that subject imports decreased to a lesser extent (** percent) than apparent U.S. consumption (** percent) from 2014 to 2016, resulting in subject imports gaining market share at the expense of the domestic industry during the POI.³³⁹ The share of apparent U.S. consumption accounted for by U.S. shipments of cumulated subject imports increased from ** percent in 2014 to ** percent in 2015 and ** percent in 2016, and was higher in interim 2017 (** percent) than in interim 2016 (** percent).³⁴⁰

2. The Current Reviews

As discussed in section III.D.1 above, despite the disciplining effect of the orders, cumulated subject imports maintained a continuous presence in the U.S. market during the

³³⁴ CR/PR at V-6. Two of five U.S. producers reported that annual contracts allow for price renegotiations. *Id.* With respect to short-term contracts, one of two U.S. producers allows for price renegotiation and two index CDMT prices to raw material prices. *Id.* With respect to long-term contracts, one of two U.S. producers allows price renegotiation and two index CDMT prices to raw material prices. *Id.*

³³⁵ CR/PR at II-28.

³³⁶ CR/PR at II-28.

³³⁷ *Confidential Views*, EDIS Doc. 791893 at 43. Cumulated subject import volumes decreased from ** short tons in 2014, to ** short tons in 2015, and ** short tons in 2016, but were greater in interim 2017 (** short tons) than in interim 2016 (** short tons). *Id.* at 42.

³³⁸ *Original Determinations*, USITC Pub. 4755 at 29.

³³⁹ *Confidential Views*, EDIS Doc. 791893 at 42-43.

³⁴⁰ *Confidential Views*, EDIS Doc. 791893 at 42-43.

POR, although they declined irregularly and remained lower than during the original investigations.³⁴¹ Specifically, cumulated subject import volume declined from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, and *** short tons in 2020, before increasing to *** short tons in 2021, and decreasing to *** short tons in 2022; it was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.³⁴² U.S. shipments of cumulated subject imports as a share of apparent U.S. consumption declined from *** percent in 2017, to *** percent in 2018, and *** percent in 2019, before increasing to *** percent in 2020 and *** percent in 2021, and finally decreasing to *** percent in 2022; it was lower in interim 2023, at *** percent, than interim 2022, at *** percent.³⁴³

The record shows that the cumulated subject producers have the ability and incentive to export significant volumes of subject merchandise to the United States in the event of revocation of the orders. The cumulated subject producers' capacity increased irregularly from 2017 to 2022, increasing from *** short tons in 2017, to *** short tons in 2018, and *** short tons in 2019, before decreasing to *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; it was slightly lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.³⁴⁴ The cumulated subject producers' production increased irregularly from *** short tons in 2017 to *** short tons in 2022, but was lower in interim 2023 at *** short tons than in interim 2022 at *** short tons.³⁴⁵ Their rate of capacity utilization increased irregularly during the POR, increasing from *** percent in 2017 to *** percent in 2018, decreasing to *** percent in 2019 and *** percent in 2020, increasing to *** percent in 2021, and then decreasing to *** percent in 2022; it was lower in interim 2023 at *** percent than in

³⁴¹ CR/PR at Table IV-1; *Confidential Views*, EDIS Doc. 791893 at 42.

³⁴² CR/PR at Table IV-1. Thus, cumulated subject import volume declined *** percent from 2017 to 2022. *Id.* U.S. shipments of subject imports were *** short tons in 2017, *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022; they were lower in interim 2023 at *** short tons than in interim 2022 at *** short tons. *Id.* at Tables I-21, C-1. As a result, U.S. shipments of subject imports declined *** percent from 2017 to 2022. *Id.*

³⁴³ CR/PR at Tables I-21, C-1, IV-1. Accordingly, U.S. shipments of cumulated subject imports as a share of apparent U.S. consumption declined *** percentage points from 2017 to 2022. *Id.*

³⁴⁴ CR/PR at Table IV-53. Thus, the cumulated subject producers' capacity increased *** percent from 2017 to 2022. *Id.*

³⁴⁵ CR/PR at Table IV-53. Therefore, the cumulated subject producers' production increased *** percent from 2017 to 2022. *Id.*

interim 2022 at *** percent.³⁴⁶ The cumulated subject producers possessed excess capacity of *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.³⁴⁷ End-of-period inventories of the cumulated subject producers increased throughout most of the POR from *** short tons in 2017 to *** short tons in 2022, equivalent to *** percent of apparent U.S. consumption that year.³⁴⁸ Additionally, as discussed above in Section III.D.1, *** German subject producers, *** Indian subject producers, *** Italian subject producers, and *** reported producing other products on the same equipment and machinery used to produce CDMT in 2022,³⁴⁹ and would therefore have the ability to increase production of CDMT by shifting production from out-of-scope merchandise produced on the same equipment.

The cumulated subject producers are also large exporters. Their exports decreased irregularly during the POR, increasing from *** short tons in 2017 to *** short tons in 2018, decreasing to *** short tons in 2019 and *** short tons in 2020, increasing to *** short tons in 2021, and finally decreasing to *** short tons in 2022; they were lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.³⁵⁰ Their exports as a share of total shipments ranged between *** and *** percent during the POR.³⁵¹ According to GTA data concerning certain cold-drawn tubes, including CDMT and out-of-scope products, global exports of such merchandise from cumulated subject producers remained at substantial levels throughout the POR, increasing irregularly from 539,251 short tons in 2017 to 647,756 in 2022.³⁵² These same data show that China, Germany, and Italy were the top three global exporters of such merchandise in 2022.³⁵³

³⁴⁶ CR/PR at Table IV-53. Thus, the cumulated subject producers' rate of capacity utilization increased *** percentage points from 2017 to 2022. *Id.*

³⁴⁷ *Calculated from* CR/PR at Tables I-21, IV-53.

³⁴⁸ CR/PR at Table IV-53. Accordingly, end-of-period inventories of the cumulated subject producers increased *** percent from 2017 to 2022. *Id.* Cumulated end-of-period inventories increased irregularly from *** short tons in 2017, to *** short tons in 2018, *** short tons in 2019, *** short tons in 2020, *** short tons in 2021, and *** short tons in 2022, they were slightly higher in interim 2023 at *** short tons than in interim 2022 at *** short tons. *Id.*

³⁴⁹ CR/PR at IV-52, 67, 83, 111, Tables IV-20, 28, 38, 51.

³⁵⁰ CR/PR at Table IV-53.

³⁵¹ CR/PR at Table IV-53.

³⁵² CR/PR at Table IV-57. Thus, cumulated exports of such products from subject countries increased *** percent from 2017 to 2022.

³⁵³ CR/PR at Table IV-57. China, Germany, and Italy accounted for 32.1 percent, 17.1 percent, and 8.1 of all global exports of such products in 2022, respectively. *Id.*

The U.S. market also remains attractive to the cumulated subject producers, providing them with the incentive to export significant volumes of subject merchandise to the United States in the event of revocation. As noted above, cumulated subject imports maintained a continuous presence in the U.S. market, indicating that they retain access to U.S. distribution networks and customers that could be used to expand their presence in the market if the orders were revoked.³⁵⁴ The record also indicates that the U.S. market offers attractive CDMT prices compared to the subject producers' home and third country markets, giving them an economic incentive to increase their exports to the U.S. market after revocation. The AUVs of the cumulated subject producers' exports to the U.S. market exceeded those of their exports to third country markets and home market shipments in 2022.³⁵⁵ The existence of multiple third-country trade barriers to carbon and alloy steel pipes and tubes, possibly including CDMT, from China, India, and South Korea would further enhance the relative attractiveness of the U.S. market to subject producers in the event of revocation.³⁵⁶

Finally, we find that the section 232 measures on subject imports from each subject country would not prevent the volume of cumulated subject imports from being significant if the orders were revoked.³⁵⁷ As discussed in section III.D.1 above, subject imports from China, India, and Switzerland are subject to 25 percent *ad valorem* section 232 tariffs and have no quota limits; subject imports from Germany and Italy are subject to TRQs that may be exceeded with the payment of 25 percent duties; and subject imports from South Korea are subject to an

³⁵⁴ CR/PR at Tables I-21, IV-53.

³⁵⁵ CR/PR at Table IV-53. Reporting foreign producers of subject merchandise reported the following AUVs in 2022: exports to the United States, \$*** per short ton; home market shipments, \$*** per short ton; exports to the EU, \$*** per short ton; exports to Asia, \$*** per short ton; and exports to all other markets, \$*** per short ton. *Id.*

³⁵⁶ CR/PR at Table IV-56. Third country trade measures include the countervailing duty orders in Australia, Brazil, and Canada on carbon and alloy steel pipes and tubes from China and the antidumping duty orders and/or investigations in Australia, Brazil, Canada, India, Thailand, Turkey, the United Kingdom, and Ukraine on carbon and alloy steel pipes and tubes from China; the antidumping duty orders in Australia, Canada, and Thailand and countervailing duty orders in Australia and Canada on carbon and alloy steel pipes and tubes from South Korea; and the antidumping and countervailing duty orders in Canada on carbon and alloy steel pipes and tubes from India. *Id.*

³⁵⁷ Subject imports from China are currently subject to a 7.5 percent *ad valorem* duty under Section 301, and all responding importers and a majority of responding purchasers reported that the duty has caused a decline in subject imports from China. CR/PR at II-2. Nevertheless, the section 301 duty did not prevent subject imports from China from increasing irregularly by *** percent from 2019, when the section 301 measure was imposed, to 2022, and from being *** percent higher in interim 2023 compared to interim 2022. *Id.* at Table IV-1. Given this, as well as the available information about the CDMT industry in China, we find that the Section 301 duties would not likely prevent subject imports from China from entering the U.S. market at significant levels if the orders were revoked.

absolute quota equivalent to *** percent of apparent U.S. consumption in 2022.³⁵⁸ These measures did not prevent the volume of cumulated subject imports from increasing *** percent from *** short tons short tons in 2019 to *** short tons in 2022 and gaining *** percentage points in terms of market share during this same period, and thus would not preclude cumulated subject imports at significant levels after revocation.³⁵⁹

Accordingly, based on the significant volume and market share of cumulated subject imports during the original investigations; the substantial presence of cumulated subject imports in the U.S. market during the POR while under the disciplining effect of the orders; the cumulated subject producers' substantial capacity, excess capacity, inventories, and exports; and the attractiveness of the U.S. market, we find that the likely volume of cumulated subject imports would be significant, both in absolute terms and relative to consumption in the United States, if the orders were revoked.

D. Likely Price Effects of Cumulated Subject Imports

1. The Original Investigations

The Commission reiterated that there was a moderate-to-high degree of substitutability between subject imports and the domestic like product and that price was an important factor in purchasing decisions.³⁶⁰ It found that cumulated subject imports undersold the domestic like product in 61 of 105 (or 58.1 percent of) quarterly price comparisons (involving *** short tons of subject imports which accounted for *** percent of the volume of cumulated subject imports covered by the Commission's pricing data during the POI) at underselling margins that ranged from *** percent to *** percent and averaged *** percent.³⁶¹ The Commission recognized that while coverage was relatively low for price comparison data, the level of coverage was not uncommon for investigations that include a wide variety of products,³⁶² and

³⁵⁸ CR/PR at I-22-23; *calculated from* CR/PR at Tables I-15, I-21. As noted above, Commissioner Schmidlein agrees that the absolute quota applicable to South Korea does not constitute a different condition of competition but does not rely on the equivalent percentage of apparent consumption as the basis for that finding.

³⁵⁹ CR/PR at Table IV-1.

³⁶⁰ *Original Determinations*, USITC Pub. 4755 at 30.

³⁶¹ *Original Determinations*, USITC Pub. 4755 at 30-34.

³⁶² Confidential Views, EDIS Doc. 791893 at 44-45. The pricing data accounted for approximately *** percent of the domestic industry's U.S. commercial shipments, *** percent of subject imports from China, *** percent of subject imports from Germany, *** percent of subject imports from India, *** percent of subject imports from Korea, and *** percent of subject imports from Italy during the POI. (Continued...)

that a large majority of responding purchasers reported that subject imports were priced lower than domestically produced CDMT and that they had purchased subject imports instead of the domestic like product because of price. Accordingly, the Commission found the underselling by cumulated subject imports to be significant.³⁶³

The Commission found that 19 of 31 responding purchasers reported purchasing subject imports instead of the domestic like product, 16 reported that subject imports were lower priced, and 15 reported that price was a primary reason for purchasing *** short tons of subject imports instead of the domestic like product.³⁶⁴ It found that these confirmed lost sales, combined with an apparent shift in purchases toward subject imports, were consistent with evidence indicating that cumulated lower-priced subject imports increased their market share at the expense of the domestic industry.³⁶⁵

The Commission examined price trends for domestically produced CDMT and cumulated subject imports.³⁶⁶ It observed that for all pricing products, prices of domestically produced CDMT and subject imports declined over the POI, and were lower at the end of the POI than at the beginning of the period for which data were reported.³⁶⁷ However, the Commission found that price decreases were expected, given the substantial decreases in apparent U.S. consumption and raw material costs, and therefore did not find that subject imports depressed prices for the domestic like product to a significant degree.³⁶⁸

The Commission also considered whether cumulated subject imports prevented price increases which otherwise would have occurred. It found that while the domestic industry's COGS to net sales ratio increased from 2014 to 2016,³⁶⁹ apparent U.S. consumption, raw

Confidential Views, EDIS Doc. 791893 at 44 n.162. No pricing data were provided for subject imports from Switzerland or from nonsubject sources. *Id.* Pricing data were reported for U.S. produced CDMT for pricing products 1-6 and for subject imports from Germany for pricing products 7-8. *Id.*

³⁶³ *Original Determinations*, USITC Pub. 4755 at 31.

³⁶⁴ *Original Determinations*, USITC Pub. 4755 at 32; Confidential Views, EDIS Doc. 791893 at 46-47. Purchasers reported decreasing their share of total purchases from domestic producers by *** percentage points between 2014 and 2016, while increasing their purchases of subject merchandise by the same amount (*** percentage points) over those years.

³⁶⁵ *Original Determinations*, USITC Pub. 4755 at 32. During the POI, the domestic industry lost *** percentage points of market share while subject imports gained *** percentage points of market share. *Id.* at Table C-1.

³⁶⁶ *Original Determinations*, USITC Pub. 4755 at 32-33.

³⁶⁷ *Original Determinations*, USITC Pub. 4755 at 32-33.

³⁶⁸ *Original Determinations*, USITC Pub. 4755 at 33.

³⁶⁹ *Original Determinations*, USITC Pub. 4755 at 33. Its COGS to net sales ratio increased from 88.9 percent in 2014 to 96.5 percent in 2015 and then decreased to 93.7 percent in 2016 (a higher level than in 2014); it was lower in interim 2017 (91.0 percent) than in interim 2016 (93.6 percent). *Id.*

material costs, and average unit COGS all decreased. Because price increases were unlikely in light of declining apparent U.S. consumption and falling raw material costs, the Commission did not find that cumulated subject imports prevented price increases, which otherwise would have occurred, to a significant degree.³⁷⁰

The Commission concluded that because significant subject import underselling had caused a shift in market share from the domestic industry to cumulated subject imports, cumulated subject imports had significant price effects.³⁷¹

2. The Current Reviews

As discussed above in Section IV.B.3., we continue to find a moderate-to-high degree of substitutability between domestically produced CDMT and subject imports, and that price is an important factor in purchasing decisions.

The Commission requested pricing data for six pricing products in these reviews.³⁷² Four U.S. producers and three importers provided usable pricing data for sales of the requested

³⁷⁰ *Original Determinations*, USITC Pub. 4755 at 33.

³⁷¹ *Original Determinations*, USITC Pub. 4755 at 33.

³⁷² CR/PR at V-11. The pricing product definitions are as follows:

Product 1.--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 5.000 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Product 2.--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 4.500 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Product 3.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 2.500 inches, wall thickness 0.240 - 0.260 inch, length 17 - 24 feet, not honed, deburred ends.

Product 4.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 3.000 inches, wall thickness 0.178 - 0.198 inch, length 17 - 24 feet, not honed, deburred ends.

Product 5.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 3.750 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Product 6.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 4.000 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

products, although not all firms reported pricing for all products for all quarters.³⁷³ Pricing data reported by these firms accounted for approximately 1.3 percent of U.S. producers' U.S. shipments of CDMT, *** percent of U.S. shipments of subject imports from China, and *** percent of U.S. shipments of subject imports from South Korea during the POR.³⁷⁴ No pricing data were reported for subject imports from Germany and Switzerland and no usable pricing data were reported for subject imports from Italy and India.³⁷⁵

The available pricing data indicate that cumulated subject imports undersold the domestic like product in 20 of 31 (or 64.5 percent of) quarterly comparisons, corresponding to reported subject import sales of *** short tons that accounted for *** percent of the volume of cumulated subject imports covered by the Commission's pricing data during the POR, at margins ranging from 0.7 to 45.9 percent and averaging 16.5 percent.³⁷⁶ Subject imports oversold the domestic like product in the remaining 11 quarterly comparisons, corresponding to reported subject import sales of *** short tons, at margins ranging from *** to *** percent and averaging *** percent.³⁷⁷

We have also considered price trends. Over the POR, sales prices for domestically produced CDMT for all six pricing products increased between *** and *** percent, depending on the product.³⁷⁸ Sales prices for pricing products three and four imported from South Korea increased by *** percent and *** percent, respectively, between ***, and the last quarter of the POR.³⁷⁹

We find that there would likely be significant underselling by cumulated subject imports if the orders were revoked, as a means of gaining market share, based on the significant underselling in the original investigations resulting in lost sales and market share for the domestic industry, the underselling with the orders in place, the moderate-to-high degree of substitutability between subject imports and the domestic like product, and the importance of price to purchasing decisions. Absent the discipline of the orders, the likely significant volume of low-priced cumulated subject imports would likely force the domestic industry to either reduce its prices, forego price increases that would otherwise have occurred, or risk losing

³⁷³ CR/PR at V-8.

³⁷⁴ CR/PR at V-9.

³⁷⁵ CR/PR at V-9 & nn. 7-8.

³⁷⁶ CR/PR at Table V-14.

³⁷⁷ CR/PR at Table V-14.

³⁷⁸ CR/PR at Table V-12.

³⁷⁹ CR/PR at Tables V-8-9. U.S. prices for products three and four increased by *** percent and *** percent, respectively, during this same period. *Id.*

market share to subject imports, as occurred in the original investigations. Thus, we find that if the orders were revoked, the significant volume of low-priced cumulated subject imports would likely have significant price effects within a reasonably foreseeable time.

E. Likely Impact of Cumulated Subject Imports³⁸⁰

1. The Original Investigations

In the original investigations, the Commission found that apparent U.S. consumption for CDMT declined between 2014 and 2016 while the domestic industry's shipments, market share, and revenues declined to an even greater extent during the same period. As a result, the domestic industry's financial performance deteriorated over the POI.³⁸¹

Although the domestic industry's capacity increased over the POI, its production, U.S. shipments and capacity utilization, and end of period inventories all declined from 2014 to 2016.³⁸² Its employment-related indicators with the exception of unit labor costs all declined during this period.³⁸³ The domestic industry's financial indicators including its sales, unit net sales value, gross profit, as well as operating income and net income both at an absolute level as well a share of net sales, declined during this period.³⁸⁴ Its capital expenditures also declined

³⁸⁰ In its expedited sunset reviews of the antidumping duty orders, Commerce calculated likely weighted-average dumping margins of up to 186.89 percent *ad valorem* for subject imports from China; 209.06 percent *ad valorem* for subject imports from Germany; 33.80 percent *ad valorem* for subject imports from India; 68.95 percent *ad valorem* for subject imports from Italy; 48.00 percent *ad valorem* for subject imports from South Korea; and 30.48 percent *ad valorem* for subject imports from Switzerland. CR/PR at I-16-18; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland: Final Results of the Expedited First Sunset Review of the Antidumping Duty Orders*, 88 Fed. Reg. 16587 (Mar. 20, 2023). In its expedited sunset reviews of the countervailing duty orders on subject imports from China and India, Commerce calculated likely subsidy margins for China ranging from 18.27 percent to 21.41 percent, depending on the respondent, and 19.84 percent for "all others;" Commerce calculated likely subsidy rates for firms in India ranging from 8.07 percent to 42.77 percent, depending on the respondent, and 22.63 percent for "all others." CR/PR at I-16-18; *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Results of Expedited First Sunset Review of Antidumping Duty Order*, 88 Fed. Reg. 19612 (Apr. 3, 2023); *Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order*, 88 Fed. Reg. 24386 (Apr. 20, 2023).

³⁸¹ *Original Determinations*, USITC Pub. 4755 at 34.

³⁸² *Original Determinations*, USITC Pub. 4755 at 34.

³⁸³ *Original Determinations*, USITC Pub. 4755 at 35.

³⁸⁴ *Original Determinations*, USITC Pub. 4755 at 36. The Commission added that the domestic industry had net and operating losses in 2015 and 2016. *Id.*

during this period and it reported negative effects on investments and development due to subject imports.³⁸⁵ The Commission found that the significant volumes of low-priced subject imports undersold the domestic like product thereby taking market share from the domestic industry, causing declines in the domestic industry's output, revenues, and financial performance. Accordingly, the Commission concluded that cumulated subject imports had a significant adverse impact on the domestic industry during the POI.³⁸⁶

In its non-attribution analysis, the Commission found that while decreases in apparent U.S. consumption from 2014 through 2016 resulted in declining U.S. shipments for both the domestic industry and cumulated subject imports, the domestic industry's shipments declined to a greater degree than apparent U.S. consumption, as indicated by the domestic industry's declining market share. It also noted that cumulated subject imports continued to gain market share between interim 2016 and interim 2017, when apparent U.S. consumption increased. Although the domestic industry's market share was also slightly higher in interim 2017 than in interim 2016, it remained lower at the end of the POI than in the beginning. The Commission concluded that declines in the domestic industry's shipments and performance were worse than what would otherwise have resulted from the decline in apparent U.S. consumption.³⁸⁷ It found that while nonsubject imports had increased their share of apparent U.S. consumption during the POI, they maintained a relatively small presence in the U.S. market.³⁸⁸ The Commission also found that market share of nonsubject imports increased by less than that of cumulated subject imports, indicating that nonsubject imports could not explain the magnitude of the domestic industry's loss of market share. It added that the market share of nonsubject imports was lower despite higher apparent U.S. consumption in interim 2017 compared to interim 2016.³⁸⁹ Accordingly, the Commission found that nonsubject imports could not explain

³⁸⁵ *Original Determinations*, USITC Pub. 4755 at 36.

³⁸⁶ *Original Determinations*, USITC Pub. 4755 at 36-37.

³⁸⁷ *Original Determinations*, USITC Pub. 4755 at 37. The Commission also found that contrary to Respondents' assertion, declining demand trends in individual market segments allegedly relied upon by the domestic industry did not explain the increase in market share for subject imports and the domestic industry's corresponding declining condition over the POI. *Original Determinations*, USITC Pub. 4755 at 37-38. As the Commission explained, U.S. producers and U.S. importers of subject merchandise reported shipments of CDMT across all reported end-use sectors, including the automotive end-use sector, and that demand declined across all reported end-use sectors. *Id.*

³⁸⁸ *Original Determinations*, USITC Pub. 4755 at 38.

³⁸⁹ *Original Determinations*, USITC Pub. 4755 at 38.

the domestic industry's deteriorating condition over the POI. The Commission therefore concluded that subject imports had a significant adverse impact on the domestic industry.³⁹⁰

2. The Current Reviews

The domestic industry's performance generally improved overall during the POR, despite declining apparent U.S. consumption. Most of the domestic industry's performance indicators improved in 2018, as the domestic industry's market share and capacity utilization initially improved after imposition of the orders, declined from 2019 to 2020 due to the effects of the COVID-19 pandemic, improved dramatically in 2021 to the highest levels of the POR, and then declined slightly from 2021 to 2022 to levels generally higher than in 2017.³⁹¹

The domestic industry's trade-related indicators generally followed this same trend. Its capacity increased irregularly during the POR from 575,200 short tons in 2017 to 601,785 short tons in 2018, before decreasing to 585,077 short tons in 2019 and 479,587 short tons in 2020, and then increasing to 530,241 short tons in 2021 and 535,029 short tons in 2022; it was lower in interim 2023 at 264,653 short tons than in interim 2022 at 274,836 short tons.³⁹² Its production volume also decreased irregularly during the POR, increasing from 467,402 short tons in 2017 to 532,461 short tons in 2018, before decreasing to 443,965 short tons in 2019 and 365,231 short tons in 2020, increasing to 450,903 short tons in 2021, and decreasing to 446,950 short tons in 2022; it was lower in interim 2023 at 220,987 short tons than in interim 2022 at 236,659 short tons.³⁹³ Its capacity utilization rate increased from 81.3 percent in 2017 to 88.5 percent in 2018, before decreasing to 75.9 percent in 2019, increasing to 76.2 percent in 2020 and 85.0 percent in 2021, before decreasing to 83.5 percent in 2022; it was lower in interim 2023 at 83.5 percent than in interim 2022 at 86.1 percent.³⁹⁴

While certain of the domestic industry's employment indicators ended the POR in 2022 lower than in 2017, including production-related workers ("PRWs") and hours worked, all indicators generally followed the same trends of initially increasing in 2018 and then declining from 2019 through 2020 before improving in 2021 and then declining slightly in 2022. The number of PRWs initially increased from 2,257 PRWs in 2017 to 2,475 PRWs in 2018, declined to 2,377 PRWs in 2019 and 2,107 PRWs in 2020, before increasing to 2,184 PRWs in 2021, and

³⁹⁰ *Original Determinations*, USITC Pub. 4755 at 38.

³⁹¹ See CR/PR at Table C-1.

³⁹² CR/PR at Tables III-5, C-1.

³⁹³ CR/PR at Tables III-5, C-1. Thus, the domestic industry's production volume decreased 4.4 percent from 2017 to 2022. *Id.*

³⁹⁴ CR/PR at Tables III-5, C-1.

to 2,226 PRWs in 2022; it was lower in interim 2023 at 2,152 PRWs than in interim 2022 at 2,255 PRWs.³⁹⁵ The industry's total number of hours worked increased from 5.4 million hours in 2017, to 5.9 million hours in 2018, before decreasing to 5.4 million hours in 2019, to 4.5 million hours in 2020, before increasing to 5.0 million hours in 2021, and to 5.2 million hours in 2022; it was lower in interim 2023 at 2.5 million hours than in interim 2022 at 2.6 million hours.³⁹⁶ Its wages paid increased from \$144.1 million in 2017 to \$164.7 million in 2018, decreased to \$149.5 million in 2019 and \$126.9 million in 2020, before increasing to \$154.5 million in 2021 and \$165.6 million in 2022; it was higher in interim 2023 at \$85.1 million than in interim 2022 at \$84.4 million.³⁹⁷ Its hourly wages increased from \$26.46 in 2017 to \$27.88 in 2018, decreased to \$27.59 in 2019, before increasing to \$28.00 in 2020, \$31.06 in 2021, and \$32.08 in 2022; they were higher in interim 2023 at \$33.87 than in interim 2022 at \$32.15.³⁹⁸ Its productivity, as measured in short tons per 1000 hours, increased from 85.8 short tons in 2017 to 90.1 short tons in 2018, decreased to 81.9 short tons in 2019 and 80.6 short tons in 2020, increased to 90.7 short tons in 2021, and declined to 86.6 short tons in 2022; it was lower in interim 2023 at 88.0 short tons than in interim 2022 at 90.1 short tons.³⁹⁹

The domestic industry's end-of-period inventories increased irregularly from 2017 to 2022 from 30,092 short tons in 2017 to 36,247 short tons in 2018, before decreasing to 23,080 short tons in 2019 and 18,438 short tons in 2020, and then increasing to 27,875 short tons in 2021 and 28,801 short tons in 2022; they were lower in interim 2023 at 22,675 short tons than in interim 2022 at 25,889 short tons.⁴⁰⁰ The industry's end-of-period inventories as a share of its U.S. shipments also increased from 7.9 percent in 2017 to 8.2 percent in 2018, before decreasing to 5.9 percent in 2019 and 2020, increasing to 7.7 percent in 2021, and then declining slightly to 7.6 percent in 2022; it was lower in interim 2023 at 5.8 percent than interim 2022 at 6.4 percent.⁴⁰¹

The domestic industry's U.S. shipments and market share also increased initially, before declining in 2019 and 2020, and then rebounding in 2021 and 2022. They increased from 382,570 short tons in 2017 to 443,330 short tons in 2018, before decreasing to 392,899 short tons in 2019 and 311,705 short tons in 2020, and then increasing to 363,046 short tons in 2021

³⁹⁵ CR/PR at Tables III-11, C-1.

³⁹⁶ CR/PR at Tables III-11, C-1.

³⁹⁷ CR/PR at Tables III-11, C-1.

³⁹⁸ CR/PR at Tables III-11, C-1.

³⁹⁹ CR/PR at Tables III-11, C-1.

⁴⁰⁰ CR/PR at Tables III-10, C-1.

⁴⁰¹ CR/PR at Table III-10.

and 379,372 short tons in 2022; they were lower in interim 2023 at 196,412 short tons than in interim 2022 at 201,715 short tons.⁴⁰² The domestic industry's U.S. shipments as a share of apparent U.S. consumption increased from *** percent in 2017, to *** percent in 2018, *** percent in 2019, and *** percent in 2020, before declining to *** percent in 2021, and then increasing *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent. *Id.*

The domestic industry's financial performance indicia improved irregularly from 2017 to 2022 and were stronger in interim 2023 compared to interim 2022 with respect to most measures. The industry's total net sales value increased from \$833.2 million in 2017 to \$1.1 billion in 2018, decreased to \$906.8 million in 2019 and \$656.8 million in 2020, before increasing to \$1.1 billion in 2021, and \$1.3 billion in 2022; it was lower in interim 2023 at \$590.6 million than in interim 2022 at \$748.0 million.⁴⁰³ Its gross profits initially increased from \$86.1 million in 2017 to \$115.5 million in 2018, decreased to \$75.8 million in 2019 and \$49.0 million in 2020, before increasing to \$164.4 million in 2021, and finally decreasing to \$151.2 million in 2022; it was higher in interim 2023 at \$105.3 million than in interim 2022 at \$103.3 million.⁴⁰⁴ The domestic industry's operating income initially increased from \$42.3 million in 2017 to \$59.4 million in 2018, decreased to \$29.8 million in 2019 and \$3.8 million in 2020, before increasing to \$103.0 million in 2021, and decreasing to \$95.0 million in 2022; it was higher in interim 2023 at \$80.0 million than in interim 2022 at \$74.5 million.⁴⁰⁵ Its ratio of operating income to net sales initially increased from 5.1 percent in 2017 to 5.6 percent in 2018, declined to 3.3 percent in 2019 and 0.6 percent in 2020, before increasing to 9.2 percent in 2021 and decreasing to 7.1 percent in 2022; it was higher in interim 2023 at 13.5 percent than in interim 2022 at 10.0 percent.⁴⁰⁶ The industry's net income initially increased from \$29.2 million in 2017 to \$50.3 million in 2018, decreased to \$21.4 million in 2019 and negative \$3.7 million in 2020, before increasing to \$92.0 million in 2021, and decreasing to \$78.6 million in 2022; it was higher in interim 2023 at \$74.6 million than in interim 2022 at \$68.8 million.⁴⁰⁷ Its net income to net sales ratio initially increased from 3.5 percent in 2017 to 4.8 percent in 2018, declined to 2.4 percent in 2019 and negative 0.6 percent in 2020, before increasing to 8.2 percent in 2021 and

⁴⁰² CR/PR at Tables I-3, I-24, C-1.

⁴⁰³ CR/PR at Tables III-12, C-1.

⁴⁰⁴ CR/PR at Tables III-12, C-1.

⁴⁰⁵ CR/PR at Tables III-12, C-1.

⁴⁰⁶ CR/PR at Tables III-12, C-1.

⁴⁰⁷ CR/PR at Tables III-12, C-1.

decreasing to 5.9 percent in 2022; it was higher in interim 2023 at 12.6 percent than in interim 2022 at 9.2 percent.⁴⁰⁸

The domestic industry's total capital expenditures initially decreased from \$26.6 million in 2017 to \$22.5 million in 2018, increased to \$30.1 million in 2019, and decreased to \$20.4 million in 2020 before increasing to \$26.0 million in 2021 and \$45.0 million in 2022; they were higher in interim 2023 at \$22.2 million than in interim 2022 at \$14.7 million.⁴⁰⁹ Its research and development ("R&D") expenses decreased from \$*** in 2017, to \$*** in 2018, \$*** in 2019, and \$*** in 2020, before increasing to \$*** in 2021, and decreasing to \$*** in 2022; they were higher in interim 2023 at \$*** than in interim 2022 at \$***.⁴¹⁰ Its return on assets increased from 7.1 percent in 2017 to 10.7 percent in 2018, decreased to 6.4 percent in 2019 and 0.9 percent in 2020, increased to 16.2 percent in 2021, and decreased to 15.3 percent in 2022.⁴¹¹

In assessing the vulnerability of the domestic industry, we observe that despite decreasing apparent U.S. consumption, most measures of the domestic industry's performance, including U.S. shipments and market share, and financial indicators such as operating and net income values and margins, improved over the POR, reaching their highest levels in 2021 before declining slightly to levels in 2022 that exceeded those in 2017. Financial indicators were also higher in interim 2023 than in interim 2022. In light of the foregoing, including the industry's generally strong performance from 2021 to 2022 and strong financial performance in interim 2023 compared to interim 2022, we do not find that the domestic industry is currently in a vulnerable condition.

As discussed above, we have found that if the orders were revoked, the volume of cumulated subject imports would likely be significant within a reasonably foreseeable time. We have also found that the significant volume of cumulated subject imports would likely undersell the domestic like product to a significant degree, forcing the domestic industry to either cut prices, forego needed price increases, or else lose market share to subject imports. The likely significant volume of cumulated subject imports, coupled with their significant price effects, would have a direct adverse impact on the domestic industry's production, shipments, profitability, and employment, as well as its ability to raise capital and make and maintain necessary capital investments. Consequently, we conclude that if the orders were revoked,

⁴⁰⁸ CR/PR at Tables III-12, C-1.

⁴⁰⁹ CR/PR at Tables III-17, C-1. Thus, the domestic industry's total capital expenditures increased 69.0 percent from 2017 to 2022. *Id.*

⁴¹⁰ CR/PR at Table III-19.

⁴¹¹ CR/PR at Table III-22.

cumulated subject imports would be likely to have an adverse impact on the domestic industry within a reasonably foreseeable time.

We have also considered the role of factors other than subject imports, including the presence of nonsubject imports. Nonsubject imports had a relatively small and stable presence in the U.S. market during the POR, accounting for *** percent of apparent U.S. consumption in 2022.⁴¹² The record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant volumes, adversely affecting the domestic industry's prices and/or taking market share from the industry and nonsubject imports upon revocation of the orders. Given that the domestic industry accounted for *** percent of apparent U.S. consumption in 2022, as well as the general substitutability of the domestic like product and subject imports and the importance of price in purchasing decisions, the presence of nonsubject imports in the U.S. market would likely not prevent the significant volume of low-priced cumulated subject imports that is likely after revocation from taking market share from the domestic industry or from forcing domestic producers to lower their prices or forgo price increases in order to retain market share. For these reasons, we find that any effects of nonsubject imports would be distinct from the likely effects attributable to the subject imports and that nonsubject imports would not prevent cumulated subject imports from having a significant impact on the domestic industry.

We have also considered the likely effects of demand trends of the domestic industry. Apparent U.S. consumption declined irregularly from *** short tons in 2017 to *** short tons in 2022, a level *** percent lower than in 2017; it was also lower in interim 2023, at *** short tons, than in interim 2022, at *** short tons.⁴¹³ Although apparent U.S. consumption recovered relatively quickly in 2021 after the sharp drop in demand caused by the COVID-19 pandemic in 2020, there is little indication that such strong demand growth will persist in the reasonably foreseeable future, particularly in light of weakening demand in 2022

⁴¹² CR/PR at Tables I-21, IV-1, C-1. Nonsubject imports decreased irregularly during the POR, increasing from *** short tons in 2017 to *** short tons in 2018, decreasing from *** short tons in 2019 to *** short tons in 2020, and then increasing to *** short tons in 2021 and *** short tons in 2022; they were higher in interim 2023 at *** short tons than in interim 2022 at *** short tons. CR/PR at Table IV-1. Their share of apparent U.S. consumption fluctuated over the POR but decreased overall by *** percentage points from 2017 to 2022. *Id.* at Tables I-21, C-1. Nonsubject imports as a share of apparent U.S. consumption increased from *** percent in 2017, to *** percent in 2018, and *** percent in 2019, before increasing to *** percent in 2020 and *** percent in 2021, and decreasing to *** percent in 2022; it was higher in interim 2023 at *** percent than in interim 2022 at *** percent. *Id.* at Tables I-21, C-1.

⁴¹³ CR/PR at Tables I-21, C-1.

and in interim 2023 compared to interim 2022.⁴¹⁴ As discussed in section IV.B.1 above, while Domestic Producers argue that demand is expected to remain strong, responding U.S. producers are split on their demand projections, with equal numbers (two) anticipating that U.S. demand for CDMT will either fluctuate up, fluctuate down, or remain the same.⁴¹⁵ Responding purchasers also provided mixed responses regarding anticipated demand.⁴¹⁶ Furthermore, a plurality of responding importers and a large majority of foreign producers reported that they do not anticipate that demand for CDMT in the U.S. market will change.⁴¹⁷ Even if demand were to decline or remain weak, the significant volume of low-priced cumulated subject imports that is likely after revocation would exacerbate any injury caused by adverse demand trends by further reducing the industry's sales and placing additional downward pressure on domestic CDMT prices.

In sum, we conclude that if the orders were revoked, cumulated subject imports from China, Germany, India, Italy, South Korea, and Switzerland would likely have a significant adverse impact on the domestic industry within a reasonably foreseeable time.

V. Conclusion

For the above-stated reasons, we determine that revocation of the countervailing duty orders on CDMT from China and India and the antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

⁴¹⁴ CR/PR at Table I-21.

⁴¹⁵ CR/PR at Table II-12.

⁴¹⁶ More responding purchasers reported that demand is expected to steadily increase or fluctuate up (seven) than those that reported that it will not change (five) or those that reported that it will either fluctuate down or steadily decrease (five). CR/PR at Table II-12.

⁴¹⁷ CR/PR at Table II-4.

Part I: Introduction

Background

On January 3, 2023, the U.S. International Trade Commission (“Commission” or “USITC”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),¹ that it had instituted reviews to determine whether revocation of the countervailing duty orders on certain cold-drawn mechanical tubing of carbon and alloy steel (“CDMT”) from China and India and the antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland would likely lead to the continuation or recurrence of material injury to a domestic industry.² ³ On April 10, 2023, the Commission determined that it would conduct full reviews pursuant to section 751(c)(5) of the Act.⁴ Table I-1 presents information relating to the background and schedule of this proceeding.⁵

¹ 19 U.S.C. 1675(c).

² 88 FR 114, January 3, 2023. All interested parties were requested to respond to this notice by submitting the information requested by the Commission.

³ In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of five-year reviews of the subject antidumping and countervailing duty orders. 88 FR 63, January 3, 2023.

⁴ 88 FR 24442, April 20, 2023. The Commission found that both the domestic interested party group response and the respondent interested party group response from Italy to its notice of institution (88 FR 114, January 3, 2023) were adequate, and determined to conduct a full review of the order on imports from Italy. The Commission also found that the respondent interested party group responses from China, Germany, India, South Korea, and Switzerland were inadequate but determined to conduct full reviews of the orders on imports from those countries in order to promote administrative efficiency in light of its determination to conduct a full review of the order with respect to Italy.

⁵ The Commission’s notice of institution, notice to conduct full reviews, and scheduling notice are referenced in appendix A and may also be found at the Commission’s web site (internet address www.usitc.gov). Commissioners’ votes on whether to conduct expedited or full reviews may also be found at the web site. Appendix B presents the witnesses that appeared at the Commission’s hearing.

Table I-1**CDMT: Information relating to the background and schedule of this proceeding**

Effective date	Action
February 1, 2018	Commerce's countervailing duty orders on CDMT from China and India (83 FR 4637)
June 11, 2018	Commerce's antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland (83 FR 26962)
January 3, 2023	Commission's institution of five-year reviews (88 FR 114)
January 3, 2023	Commerce's initiation of five-year reviews (88 FR 63)
March 20, 2023	Commerce's final results of expedited five-year reviews of the antidumping duty orders (88 FR 16587)
April 3, 2023	Commerce's final results of expedited five-year review of the countervailing duty order on CDMT from China (88 FR 19612)
April 10, 2023	Commission's determinations to conduct full five-year reviews (88 FR 24442, April 20, 2023)
April 20, 2023	Commerce's final results of expedited five-year review of the countervailing duty order on CDMT from India (88 FR 24386)
July 7, 2023	Commission's scheduling of the reviews (88 FR 44841, July 13, 2023)
November 28, 2023	Commission's hearing
January 19, 2024	Commission's vote
February 9, 2024	Commission's determinations and views

The original investigations

The original investigations resulted from petitions filed on April 19, 2017, by ArcelorMittal Tubular Products ("ArcelorMittal"), Shelby, Ohio; Michigan Seamless Tube, LLC, ("Michigan Seamless") South Lyon, Michigan; PTC Alliance Corp. ("PTC Alliance"), Wexford, Pennsylvania; Webco Industries, Inc. ("Webco"), Sand Springs, Oklahoma; and Zekelman Industries, Inc. ("Zekelman"), Farrell, Pennsylvania, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of CDMT from China and India and less-than-fair-value ("LTFV") imports of CDMT from China, Germany, India, Italy, South Korea, and Switzerland.⁶ Following notification of a final determination by Commerce that imports of CDMT from China and India were being subsidized, the Commission determined on January 24, 2018 that a domestic industry was materially injured by reason of subsidized imports of CDMT from China and India.⁷ Following notification of a final determination by Commerce that imports of CDMT from China, Germany, India, Italy, South Korea, and Switzerland were being sold at LTFV, the Commission determined on May 31, 2018 that a domestic industry was materially injured by reason of LTFV imports of CDMT from

⁶ Cold-Drawn Mechanical Tubing from China and India, Inv. Nos. 701-TA-576-577 (Final), USITC Publication 4755, January 2018 ("Original CVD publication"), p. I-1.

⁷ 83 FR 4269, January 30, 2018.

China, Germany, India, Italy, South Korea, and Switzerland.⁸ Commerce published the countervailing duty orders on subject imports of CDMT from China and India on February 1, 2018.⁹ Commerce published the antidumping duty orders on CDMT from China, Germany, India, Italy, South Korea, and Switzerland on June 11, 2018.¹⁰

Previous and related investigations

CDMT has not been the subject of any prior related antidumping or countervailing duty investigations in the United States.

Summary data

Table I-2 presents a summary of data for the last year of the original investigations and the last year of these current full first five-year reviews.

The quantity of apparent U.S. consumption was *** percent higher in 2022 than in 2016, and the value of apparent U.S. consumption was *** percent higher. U.S. producers' market share, by quantity, increased by *** percentage points from 2016 to 2022. The market share of subject source imports declined by *** percentage points from 2016 to 2022, and the market share for imports from nonsubject sources decreased by *** percentage points. The quantity of U.S. shipments of subject imports from China, Germany, Italy, South Korea, and Switzerland were *** percent, *** percent, *** percent, *** percent, and *** percent lower, respectively, in 2022 than in 2016; whereas the quantity of U.S. shipments of subject imports from India were *** percent higher. Overall, U.S. shipments of imports from subject sources, by quantity, were *** percent lower in 2022 than in 2016.

The U.S. producers' capacity was 24.2 percent lower in 2022 than in 2016, while their production was 22.7 percent higher. The number of U.S. producers' production-related workers increased from 1,802 in 2016 to 2,226 in 2022, but productivity declined from 97.9 short tons

⁸ 83 FR 26088, June 5, 2018.

⁹ 83 FR 4637, February 1, 2018.

¹⁰ 83 FR 26962, June 11, 2018. As a result of litigation, Commerce amended its final determination and revoked the antidumping duty order, in part, with respect to Goodluck India Limited ("Goodluck"), a CDMT producer in India, effective May 10, 2020. 85 FR 31742, May 27, 2020. Based on a decision from the U.S. Court of Appeals for the Federal Circuit, however, Commerce reinstated its final determination and antidumping duty order with respect to the dumping margin assigned to Goodluck as of September 10, 2021. 86 FR 74069, December 29, 2021. Also, in December 2021, the Court of International Trade affirmed the Commission's affirmative determinations, finding that the Commission's definition of the domestic like product and its decision not to define airbag tubing as separate domestic like product were not unreasonable. *toliv Asp, Inc. v. United States*, 422 F. Supp. 3d 1295 (Ct. Int'l Trade 2019) at 1308.

per 1,000 hours to 86.6 short tons per 1,000 hours. The U.S. producers reported an operating loss of \$502,000 in 2016 and an operating income of \$95.0 million in 2022.

Table I-2
CDMT: Comparative data from the original investigations and these first five-year reviews, by terminal years

Quantity in short tons; value in 1,000 dollars; share in percent

Item	Measure	2016	2022
Apparent consumption	Quantity	445,089	***
U.S. producers market share	Share of quantity	71.6	***
China market share	Share of quantity	***	***
Germany market share	Share of quantity	***	***
India market share	Share of quantity	***	***
Italy market share	Share of quantity	***	***
South Korea market share	Share of quantity	***	***
Switzerland market share	Share of quantity	***	***
Subject market share	Share of quantity	***	***
Nonsubject market share	Share of quantity	***	***
Import market share	Share of quantity	28.4	***
Apparent consumption	Value	774,443	***
U.S. producers market share	Share of value	68.5	***
China market share	Share of value	***	***
Germany market share	Share of value	***	***
India market share	Share of value	***	***
Italy market share	Share of value	***	***
South Korea market share	Share of value	***	***
Switzerland market share	Share of value	***	***
Subject market share	Share of value	***	***
Nonsubject market share	Share of value	***	***
Import market share	Share of value	31.5	***

Table continued.

Table I-2 Continued

CDMT: Comparative data from the original investigations and these first five-year reviews, by terminal years

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

Item	Measure	2016	2022
China	Quantity	***	***
China	Value	***	***
China	Unit value	***	***
Germany	Quantity	***	***
Germany	Value	***	***
Germany	Unit value	***	***
India	Quantity	***	***
India	Value	***	***
India	Unit value	***	***
Italy	Quantity	***	***
Italy	Value	***	***
Italy	Unit value	***	***
South Korea	Quantity	***	***
South Korea	Value	***	***
South Korea	Unit value	***	***
Switzerland	Quantity	***	***
Switzerland	Value	***	***
Switzerland	Unit value	***	***
Subject sources	Quantity	***	***
Subject sources	Value	***	***
Subject sources	Unit value	***	***
Nonsubject sources	Quantity	***	***
Nonsubject sources	Value	***	***
Nonsubject sources	Unit value	***	***
All import sources	Quantity	126,453	***
All import sources	Value	243,638	***
All import sources	Unit value	\$1,927	***

Table continued.

Table I-2 Continued**CDMT: Comparative data from the original investigations and these first five-year reviews, by terminal years**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio in percent

Item	Measure	2016	2022
Capacity	Quantity	706,243	535,029
Production	Quantity	364,210	446,950
Capacity utilization	Ratio	51.6	83.5
Producer U.S. shipments	Quantity	318,636	379,372
Producer U.S. shipments	Value	530,805	1,136,502
Producer U.S. shipments	Unit value	\$1,666	\$2,996
Producer inventories	Quantity	39,098	28,801
Producer inventory ratio to total shipments	Ratio	10.5	6.5
Production workers (number)	Noted in label	1,802	2,226
Hours worked (in 1,000 hours)	Noted in label	3,722	5,163
Wages paid (1,000 dollars)	Value	97,978	165,637
Hourly wages (dollars per hour)	Value	\$26.32	\$32.08
Productivity (short tons per 1,000 hours)	Noted in label	97.9	86.6
Net sales	Quantity	371,474	444,122
Net sales	Value	618,119	1,335,074
Net sales	Unit value	\$1,664	\$3,006
Cost of goods sold	Value	578,907	1,183,849
Gross profit or (loss)	Value	39,212	151,225
SG&A expense	Value	39,714	56,266
Operating income or (loss)	Value	(502)	94,959
Unit COGS	Unit value	\$1,558	\$2,666
Unit operating income	Unit value	\$(1)	\$214
COGS/ Sales	Ratio	93.7	88.7
Operating income or (loss)/sales	Ratio	(0.1)	5.9

Source: Investigation Nos. 701-TA-576-577 and 731-TA-1362-1367 (Final): Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland, Confidential Report, INV-PP-168, December 22, 2017 ("original confidential report"); and compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Data presented for 2016 are for the last year of the original investigations and data presented for 2022 are for the last year of these first five-year reviews.

Table I-3 and figure I-1 present U.S. producers' and U.S. importers' U.S. shipments for the original investigations and the current full five-year reviews.

Table I-3
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in short tons

Source	Measure	2014	2015	2016
U.S. producers	Quantity	432,553	355,924	318,636
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	126,020	117,999	126,453
All sources	Quantity	558,573	473,923	445,089

Table continued.

Table I-3 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in short tons

Source	Measure	2017	2018	2019
U.S. producers	Quantity	382,570	443,330	392,899
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***

Table continued.

Table I-3 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and period

Quantity in short tons

Source	Measure	2020	2021	2022
U.S. producers	Quantity	311,705	363,046	379,372
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***

Source: Data for 2014 to 2016 are from the original confidential report. Data for 2017 to 2022 are from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Figure I-1
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and period

* * * * *

Source: Data for 2014-16 are from the original confidential report. Data for 2017-22 are from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Statutory criteria

Section 751(c) of the Act requires Commerce and the Commission to conduct a review no later than five years after the issuance of an antidumping or countervailing duty order or the suspension of an investigation to determine whether revocation of the order or termination of the suspended investigation “would be likely to lead to continuation or recurrence of dumping or a countervailable subsidy (as the case may be) and of material injury.”

Section 752(a) of the Act provides that in making its determination of likelihood of continuation or recurrence of material injury--

(1) IN GENERAL.-- . . . the Commission shall determine whether revocation of an order, or termination of a suspended investigation, would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time. The Commission shall consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated. The Commission shall take into account--

(A) its prior injury determinations, including the volume, price effect, and impact of imports of the subject merchandise on the industry before the order was issued or the suspension agreement was accepted,

(B) whether any improvement in the state of the industry is related to the order or the suspension agreement,

(C) whether the industry is vulnerable to material injury if the order is revoked or the suspension agreement is terminated, and

(D) in an antidumping proceeding . . . , (Commerce’s findings) regarding duty absorption

(2) VOLUME.--In evaluating the likely volume of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether the likely volume of imports of the subject merchandise would be significant if the order is revoked or the suspended investigation is terminated, either in absolute terms or relative to production or consumption in the United States. In so doing, the Commission shall consider all relevant economic factors, including--

(A) any likely increase in production capacity or existing unused production capacity in the exporting country,

(B) existing inventories of the subject merchandise, or likely increases in inventories,

(C) the existence of barriers to the importation of such merchandise into countries other than the United States, and

(D) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.

(3) PRICE.--In evaluating the likely price effects of imports of the subject merchandise if the order is revoked or the suspended investigation is terminated, the Commission shall consider whether--

(A) there is likely to be significant price underselling by imports of the subject merchandise as compared to domestic like products, and

(B) imports of the subject merchandise are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of domestic like products.

(4) IMPACT ON THE INDUSTRY.--In evaluating the likely impact of imports of the subject merchandise on the industry if the order is revoked or the suspended investigation is terminated, the Commission shall consider all relevant economic factors which are likely to have a bearing on the state of the industry in the United States, including, but not limited to--

(A) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,

(B) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, and

(C) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.

The Commission shall evaluate all such relevant economic factors . . . within the context of the business cycle and the conditions of competition that are distinctive to the affected industry.

Section 752(a)(6) of the Act states further that in making its determination, “the Commission may consider the magnitude of the margin of dumping or the magnitude of the net countervailable subsidy. If a countervailable subsidy is involved, the Commission shall consider

information regarding the nature of the countervailable subsidy and whether the subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement.”

Organization of report

Information obtained during the course of the reviews that relates to the statutory criteria is presented throughout this report. A summary of trade and financial data for CDMT as collected in the original investigations and the current full five-year reviews is presented in appendix C. U.S. industry data are based on the questionnaire responses of six U.S. producers of CDMT that are believed to have accounted for greater than 90 percent of domestic production of CDMT in 2022.¹¹ U.S. import data and related information are based on the questionnaire responses of 25 U.S. importers of CDMT that are believed to have accounted for *** percent of the total subject U.S. imports during 2022, supplemented with additional data compiled from proprietary, Census-edited Customs records, unless otherwise specified.¹² Foreign industry data and related information for Germany, India, Italy, South Korea, and Switzerland are based on the questionnaire responses of 13 producers of CDMT,¹³ the domestic interested parties’ response to the notice of institution,¹⁴ official export statistics as reported in the Global Trade Atlas, and industry research information. Three producers accounted for *** of total production in Germany in 2022; three producers accounted for *** of total production in India in 2022; four producers accounted for *** of total production in Italy in 2022; one producer accounted for *** of total production in South Korea in 2022; and two producers accounted for

¹¹ Coverage is calculated based on total U.S. production estimated by domestic interested parties. Domestic interested parties’ response to the notice of institution, February 2, 2023, pp. 14-15 and exh. 1.

¹² See table I-20 for coverage calculation. Consistent with the methodology used in the original final investigations, U.S. imports of CDMT reported in questionnaire responses were supplemented with proprietary, Census-edited Customs records for nonresponding U.S. importers using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 (as adjusted to remove data from proprietary, Census-edited Customs records of firms that indicated in response to the Commission’s questionnaire that they did not import CDMT at any time since January 1, 2017). The vast majority of subject merchandise is imported under these eight HTS statistical reporting numbers. However, in some cases subject product could enter under other HTS statistical reporting numbers than listed above. The Commission’s U.S. importers’ questionnaire gathered data on the quantity of such imports.

¹³ An additional firm, ***, reported being only an exporter of CDMT from Germany and Italy.

¹⁴ Domestic interested parties’ response to the notice of institution, February 2, 2023, exh. 1.

*** of total production in Switzerland in 2022.¹⁵ Currently, there are believed to be approximately 68 producers of CDMT in China; however, despite repeated staff efforts, none submitted a questionnaire response. Therefore, foreign industry data and related information for China are based on the domestic interested parties' response to the notice of institution,¹⁶ official export statistics as reported in the Global Trade Atlas, and industry research information. Responses by U.S. producers, importers, purchasers, and foreign producers of CDMT to a series of questions concerning the significance of the existing antidumping and countervailing duty orders and the likely effects of revocation of such orders are presented in appendix D.

Commerce's reviews¹⁷

Administrative reviews

There have been no completed administrative reviews with respect to the orders on subject imports from China, Germany, South Korea, and Switzerland.¹⁸ Commerce has completed four administrative reviews of the outstanding countervailing duty order on CDMT from India, four administrative reviews of the outstanding antidumping duty order on CDMT from India, and three administrative reviews of the outstanding antidumping duty order on CDMT from Italy.¹⁹

¹⁵ Coverage estimates are based on company estimates provided in foreign producer questionnaires, responses to the notice of institution, and original confidential report.

¹⁶ Domestic interested parties' response to the notice of institution, February 2, 2023, exh. 1.

¹⁷ Commerce has not issued any scope rulings, duty absorption findings, or circumvention findings since the imposition of the orders that are the subject of these five-year reviews. Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Reviews of the Antidumping Duty Orders on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland ("I&D Memo (AD Reviews)"), March 14, 2023; Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from the People's Republic of China ("I&D Memo (CVD China Review)"), March 24, 2023; and Issues and Decision Memorandum for the Final Results of the Expedited First Sunset Review of the Countervailing Duty Order on Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from India ("I&D Memo (CVD India Review)"), April 14, 2023.

¹⁸ I&D Memo (AD Reviews), March 14, 2023; and I&D Memo (CVD China Review), March 24, 2023.

¹⁹ For previously reviewed or investigated companies not included in an administrative review, the cash deposit rate continues to be the company-specific rate published for the most recent period.

India

Since the issuance of the countervailing duty order on imports of CDMT from India, Commerce has completed four administrative reviews. The final results of the administrative reviews are shown in table I-4.

Table I-4
CDMT: Administrative reviews of the countervailing duty order on imports from India

Date results published	Period of review	Producer or exporter	Subsidy rate (percent)
October 19, 2020 (85 FR 66304)	September 25, 2017 - December 21, 2018	Goodluck India Limited (formerly Good Luck Steel Tubes Limited); Good Luck Steel Tubes Limited Good Luck House; and Good Luck Industries ("Goodluck India Limited")	5.86 (2017) 5.21 (2018)
October 19, 2020 (85 FR 66304)	September 25, 2017 - December 21, 2018	Tube Investments of India Ltd.	4.27 (2017) 5.17 (2018)
December 10, 2021 (86 FR 70444)	January 1, 2019 - December 31, 2019	Goodluck India Limited	5.35
December 10, 2021 (86 FR 70444)	January 1, 2019 - December 31, 2019	Tube Investments of India Ltd.	7.70
September 12, 2022 (87 FR 55783)	January 1, 2020 - December 31, 2020	Goodluck India Limited	3.30
September 12, 2022 (87 FR 55783)	January 1, 2020 - December 31, 2020	Tube Investments of India Ltd.	5.94
September 12, 2022 (87 FR 55783)	January 1, 2020 - December 31, 2020	KLT Automotive and Tubular Products Limited; Metamorphosis Engitech India Private Limited; and Pennar Industries Limited India	4.07
September 6, 2023 (88 FR 60928)	January 1, 2021 - December 31, 2021	Goodluck India Limited	3.39
September 6, 2023 (88 FR 60928)	January 1, 2021 - December 31, 2021	Tube Investments of India Ltd.	3.97
September 6, 2023 (88 FR 60928)	January 1, 2021 - December 31, 2021	Lal Baba Seamless Tubes Pvt. Ltd.; and Metamorphosis Engitech India Pvt. Ltd.	3.74

Source: Cited Federal Register notices.

Since the implementation of the antidumping duty order on imports of CDMT from India, Commerce has completed four administrative reviews. The final results of the administrative reviews are shown in table I-5.

Table I-5
CDMT: Administrative reviews of the antidumping duty order on imports from India

Date results published	Period of review	Producer or exporter	Margin (percent)
April 23, 2021 (86 FR 21695)	November 22, 2017 - May 31, 2019	Tube Products of India, Ltd., a unit of Tube Investments of India Limited	7.96
October 29, 2021 (86 FR 59982)	June 1, 2019 – May 31, 2020	Tube Products of India, Ltd., a unit of Tube Investments of India Limited	13.06
January 9, 2023 (88 FR 1184)	June 1, 2020 – May 31, 2021	Tube Products of India, Ltd., a unit of Tube Investments of India Limited	16.80
June 26, 2023 (88 FR 41384), as corrected July 3, 2023 (88 FR 42692)	November 22, 2017 - May 31, 2019	Goodluck India Limited	1.59
June 26, 2023 (88 FR 41384), as corrected July 3, 2023 (88 FR 42692)	June 1, 2019 - May 31, 2020	Goodluck India Limited	1.39
November 22, 2023 (88 FR 81367)	June 1, 2021 – May 31, 2022	Goodluck India Limited (entries may have been made under the following company names: Goodluck India Limited; Good Luck Steel Tubes Limited; and Good Luck Industries.	0.61
November 22, 2023 (88 FR 81367)	June 1, 2021 – May 31, 2022	Tube Products of India, Ltd., a unit of Tube Investments of India Limited	4.14

Source: Cited Federal Register notices.

Italy

Since the implementation of the antidumping duty order on imports of CDMT from Italy, Commerce has completed three administrative reviews. The final results of the administrative reviews are shown in table I-6.

Table I-6
CDMT: Administrative reviews of the antidumping duty order on imports from Italy

Date results published	Period of review	Producer or exporter	Margin (percent)
April 28, 2021 (86 FR 22390)	November 22, 2017 - May 31, 2019	Dalmine S.p.A.	10.99
January 3, 2022 (87 FR 71)	June 1, 2019 - May 31, 2020	Dalmine S.p.A.	0.00
January 10, 2023 (88 FR 1358)	June 1, 2020 - May 31, 2021	Dalmine S.p.A.	0.00

Source: Cited Federal Register notices.

Changed circumstances reviews

Commerce has conducted no changed circumstances reviews with respect to the orders on subject imports from Germany, India, Italy, South Korea, and Switzerland.²⁰

On July 6, 2020, Commerce received a request to conduct a changed circumstances review from Scot Industries Inc. (“Scot Industries”), a U.S. importer of subject merchandise from China, to partially revoke the antidumping and countervailing duty orders on certain CDMT imports from China. Scot Industries explained that the request resulted from a lack of interest among domestic producers of maintaining the orders, as well as a lack of production of the subject merchandise in the United States. On September 21, 2020, Commerce found the request to be inadequate, as Scot Industries did not demonstrate sufficient industry support for the request from producers accounting for substantially all of the production of the domestic like product.²¹

²⁰ I&D Memo (AD Reviews), March 14, 2023; I&D Memo (CVD China Review), March 24, 2023; and I&D Memo (CVD India Review), April 14, 2023.

²¹ I&D Memo (CVD China Review), March 24, 2023.

Five-year reviews

Commerce has issued the final results of its expedited reviews with respect to all subject countries.²² Tables I-7 through I-14 present the margins calculated by Commerce in its original investigations and first five-year reviews.

Table I-7

CDMT: Commerce's original and first five-year countervailable subsidy rates for producers/exporters in China

Producer/exporter	Original subsidy rate (percent)	First five-year review subsidy rate (percent)
Jiangsu Hongyi Steel Pipe Co., Ltd.	21.41	21.41
Zhangjiagang Huacheng Import & Export Co., Ltd.	18.27	18.27
All others	19.84	19.84

Source: 82 FR 58175, December 11, 2017; and 88 FR 19612, April 3, 2023.

Table I-8

CDMT: Commerce's original and first five-year dumping margins for producers/exporters in China

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Jiangsu Huacheng Industry Pipe Making Corporation, and Zhangjiagang Salem Fine Tubing Co., Ltd. / Zhangjiagang Huacheng Import & Export Co., Ltd.; Anji Pengda Steel Pipe Co., Ltd. / Anji Pengda Steel Pipe Co., Ltd.; Changshu Fushilai Steel Pipe Co., Ltd. / Changshu Fushilai Steel Pipe Co., Ltd.; Changshu Special Shaped Steel Tube Co., Ltd. / Changshu Special Shaped Steel Tube Co., Ltd.; Jiangsu Liwan Precision Tube Manufacturing Co., Ltd. / Suzhou Foster International Co., Ltd.; Zhangjiagang Precision Tube Manufacturing Co., Ltd. (Zhangjiagang Tube) / Suzhou Foster International Co., Ltd.; Wuxi Dajin High-Precision Cold-Drawn Steel Tube Co., Ltd. / Wuxi Huijin International Trade Co., Ltd.; Zhangjiagang Shengdingyuan Pipe-Making Co., Ltd. / Zhangjiagang Shengdingyuan Pipe-Making Co., Ltd.; Zhejiang Minghe Steel Pipe Co., Ltd. Zhejiang Minghe Steel Pipe Co., Ltd.; Zhejiang Dingxin Steel Tube Manufacturing Co., Ltd. / Zhejiang Dingxin Steel Tube Manufacturing Co., Ltd.	45.15	See note
China-wide entity	186.89	See note

Source: 83 FR 16322, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from China would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 186.89 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

²² 88 FR 16587, March 20, 2023; 88 FR 19612, April 3, 2023; and 88 FR 24386, April 20, 2023.

Table I-9**CDMT: Commerce's original and first five-year dumping margins for producers/exporters in Germany**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Benteler Steel/Tube GmbH/Benteler Distribution International GmbH	3.11	See note
Mubea Fahrwerksfedern GmbH and Salzgitter Mannesmann Line Pipe GmbH	209.06	See note
All others	3.11	See note

Source: 83 FR 16326, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from Germany would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 209.06 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-10**CDMT: Commerce's original and first five-year countervailing subsidy margins for producers/exporters in India**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Goodluck India Limited	8.02	8.07
Tube Investments of India Limited	42.60	42.77
All others	22.41	22.63

Source: 82 FR 58172, December 11, 2017, as corrected in 86 FR 30595, June 9, 2021; and 88 FR 24386, April 20, 2023.

Table I-11**CDMT: Commerce's original and first five-year dumping margins for producers/exporters in India**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Goodluck India Limited	33.80	See note
Tube Products of India, Ltd. a unit of Tube Investments of India Limited	8.26	See note
All others	8.26	See note

Source: 83 FR 16296, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from India would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 33.80 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-12**CDMT: Commerce's original and first five-year dumping margins for producers/exporters in Italy**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Dalmine, S.p.A. and Metalfer, S.p.A.	68.95	See note
All others	47.87	See note

Source: 83 FR 16289, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from Italy would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 68.95 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-13**CDMT: Commerce's original and first five-year dumping margins for producers/exporters in South Korea**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Sang Shin Ind. Co., Ltd. and Yulchon Co., Ltd.	48.00	See note
All others	30.67	See note

Source: 83 FR 16319, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from South Korea would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 48.00 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

Table I-14**CDMT: Commerce's original and first five-year dumping margins for producers/exporters in Switzerland**

Producer/exporter	Original margin (percent)	First five-year review margin (percent)
Benteler Rothrist AG	7.66	See note
Mubea Prazisionsstahlrohr AG	30.48	See note
All others	9.00	See note

Source: 83 FR 16293, April 16, 2018; and 88 FR 16587, March 20, 2023.

Note: In its expedited first review, Commerce determined that revocation of the antidumping duty order on CDMT from Switzerland would be likely to lead to continuation or recurrence of dumping at weighted-average margins of up to 30.48 percent. Commerce did not present weighted-average dumping margins for individual companies or a country-wide dumping margin.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:²³

The products covered by these orders are cold-drawn mechanical tubing of carbon and alloy steel (cold-drawn mechanical tubing) of circular cross-section, 304.8 mm or more in length, in actual outside diameters less than 331 mm, and regardless of wall thickness, surface finish, end finish or industry specification. The subject cold-drawn mechanical tubing is a tubular product with a circular cross-sectional shape that has been cold-drawn or otherwise cold-finished after the initial tube formation in a manner that involves a change in the diameter or wall thickness of the tubing, or both. The subject cold-drawn mechanical tubing may be produced from either welded (e.g., electric resistance welded, continuous welded, etc.) or seamless (e.g., pierced, pilgered or extruded, etc.) carbon or alloy steel tubular products. It may also be heat treated after cold working. Such heat treatments may include, but are not limited to, annealing, normalizing, quenching and tempering, stress relieving or finish annealing. Typical cold-drawing methods for subject merchandise include, but are not limited to, drawing over mandrel, rod drawing, plug drawing, sink drawing and similar processes that involve reducing the outside diameter of the tubing with a die or similar device, whether or not controlling the inside diameter of the tubing with an internal support device such as a mandrel, rod, plug or similar device. Other cold-finishing operations that may be used to produce subject merchandise include cold-rolling and cold-sizing the tubing.

Subject cold-drawn mechanical tubing is typically certified to meet industry specifications for cold-drawn tubing including but not limited to:

(1) American Society for Testing and Materials (ASTM) or American Society of Mechanical Engineers (ASME) specifications ASTM A-512, ASTM A-513 Type 3 (ASME SA513 Type 3), ASTM A-513 Type 4 (ASME SA513 Type 4), ASTM A-513 Type 5 (ASME SA513 Type 5), ASTM A-513 Type 6 (ASME SA513 Type 6), ASTM A-519 (cold-finished);

²³ 88 FR 16587, March 20, 2023; 88 FR 19612, April 3, 2023; and 88 FR 24386, April 20, 2023.

(2) SAE International (Society of Automotive Engineers) specifications SAE J524, SAE J525, SAE J2833, SAE J2614, SAE J2467, SAE J2435, SAE J2613;

(3) Aerospace Material Specification (AMS) AMS T-6736 (AMS 6736), AMS 6371, AMS 5050, AMS 5075, AMS 5062, AMS 6360, AMS 6361, AMS 6362, AMS 6371, AMS 6372, AMS 6374, AMS 6381, AMS 6415;

(4) United States Military Standards (MIL) MIL-T-5066 and MIL-T-6736;

(5) foreign standards equivalent to one of the previously listed ASTM, ASME, SAE, AMS or MIL specifications including but not limited to:

(a) German Institute for Standardization (DIN) specifications DIN 2391-2, DIN 2393-2, DIN 2394-2);

(b) European Standards (EN) EN 10305-1, EN 10305-2, EN 10305-4, EN 10305-6 and European national variations on those standards (e.g., British Standard (BS EN), Irish Standard (IS EN) and German Standard (DIN EN) variations, etc.);

(c) Japanese Industrial Standard (JIS) JIS G 3441 and JIS G 3445; and

(6) proprietary standards that are based on one of the above-listed standards.

The subject cold-drawn mechanical tubing may also be dual or multiple certified to more than one standard. Pipe that is multiple certified as cold-drawn mechanical tubing and to other specifications not covered by this scope, is also covered by the scope of these orders when it meets the physical description set forth above.

Steel products included in the scope of these orders are products in which:

(1) Iron predominates, by weight, over each of the other contained elements; and (2) the carbon content is 2 percent or less by weight.

For purposes of this scope, the place of cold-drawing determines the country of origin of the subject merchandise. Subject merchandise that is subject to minor working in a third country that occurs after drawing in one of the subject countries including, but not limited to, heat treatment, cutting to length, straightening, nondestruction testing, deburring or chamfering, remains within the scope of these orders.

All products that meet the written physical description are within the scope of these orders unless specifically excluded or covered by the scope of an existing order.

Merchandise that meets the physical description of cold-drawn mechanical tubing above is within the scope of these orders even if it is also dual or multiple certified to an otherwise excluded specification listed below. The following products are outside of, and/or specifically excluded from, the scope of these orders:

(1) Cold-drawn stainless steel tubing, containing 10.5 percent or more of chromium by weight and not more than 1.2 percent of carbon by weight;

(2) products certified to one or more of the ASTM, ASME or American Petroleum Institute (API) specifications listed below: ASTM A-53; ASTM A-106; ASTM A-179 (ASME SA 179); ASTM A-192 (ASME SA 192); ASTM A-209 (ASME SA 209); ASTM A-210 (ASME SA 210); ASTM A-213 (ASME SA 213); ASTM A-334 (ASME SA 334); ASTM A-423 (ASME SA 423); ASTM A-498; ASTM A-496 (ASME SA 496); ASTM A-199; ASTM A-500; ASTM A-556; ASTM A-565; API 5L; and API 5CT except that any cold-drawn tubing product certified to one of the above excluded specifications will not be excluded from the scope if it is also dual- or multiple-certified to any other specification that otherwise would fall within the scope of these orders.

Tariff treatment

CDMT is currently imported under Harmonized Tariff Schedule of the United States (“HTSUS” or “HTS”) statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030. The merchandise subject to these reviews may also be imported under the following HTS statistical reporting numbers: 7306.30.1000 and 7306.50.1000.²⁴ The general rate of duty is “Free” for all HTS subheadings listed above.²⁵ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection (“CBP”).

Effective September 1, 2019, CDMT originating in China was subject to an additional 15 percent ad valorem duty under section 301 of the Trade Act of 1974, as amended. Effective February 14, 2020, the section 301 duty for CDMT was reduced to 7.5 percent.²⁶

Effective March 23, 2018, CDMT originating in China, India, and Switzerland is subject to an additional 25 percent ad valorem duty under section 232 of the Trade Expansion Act of 1962, as amended.²⁷ Effective June 1, 2019, CDMT originating in South Korea is exempt from

²⁴ These tariff classifications are not limited to any specific maximum outside diameters and may contain other products outside the scope of this review.

²⁵ USITC, HTSUS (2023) Revision 11, USITC Publication 5462, September 2023, pp. 73-9, 73-12, 73-17, 73-19, 73-43.

²⁶ 84 FR 45821, August 30, 2019; 85 FR 3741, January 22, 2020. See also HTS heading 9903.88.15 and U.S. notes 20(r) and 20(s) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5462, September 2023, pp. 99-III-87 – 99-III-88, 99-III-98, 99-III-303, 99-III-305 – 99-III-309.

²⁷ Section 232 import duties on steel articles currently cover all countries of origin except Argentina, Australia, Brazil, Canada, Mexico, and South Korea. Imports from Australia, Canada, and Mexico are exempt from section 232 duties and quotas on steel articles, while imports originating in Argentina, Brazil, and South Korea are exempt from duties but are instead subject to absolute quotas (effective June 1, 2018). European Union (“EU”) member countries (effective January 1, 2022), Japan (effective April 1, 2022), and the United Kingdom (effective June 1, 2022) are currently subject to tariff rate quotas (“TRQs”) for steel articles, and imports that exceed the TRQ limits are subject to the section 232 tariffs. Section 232 import duties on steel articles originating in Turkey were temporarily raised from 25 percent to 50 percent, effective August 13, 2018, but restored to 25 percent effective May 21, 2019. In addition, section 232 duties on steel articles originating in Ukraine are suspended, effective June 1, 2022, to June 1, 2024. 83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23421, May 21, 2019, 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; 87 FR 33591, June 3, 2022; 88 FR 36437, June 5, 2023.

See also HTS heading 9903.80.01, 9903.80.24, 9903.80.84, 9903.81.44, and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 1, USITC Publication 5412, February 2023, pp. 99-III-5–8, 99-III-266, 99-III-269–270, 99-III-276–277, 99-III-283, 99-III-286.

section 232 duties but is instead subject to annual absolute quotas.²⁸ The import quotas cover CDMT and out-of-scope products. Effective from January 1, 2022, to December 31, 2023, CDMT originating in Germany or Italy is subject to annual tariff-rate quotas (“TRQs”) and imports above the TRQ limits are subject to section 232 duties.²⁹ The TRQs cover CDMT and out-of-scope products. Table I-15 presents the section 232 steel annual absolute quota and TRQ limits, usage, and fill rates for imports originating in the subject countries during full-year 2022. Table I-16 presents these limits, usage, and fill rates during first-half 2023.

²⁸ Imports of steel articles, including CDMT, originating in South Korea were initially exempted from the section 232 tariffs, effective March 23, 2018 (83 FR 13361, March 28, 2018); but the duty exemptions were continued subject to annual absolute quotas, effective June 1, 2018 (83 FR 20683, May 7, 2018).

See also HTS heading 9903.80.01, 9903.80.24, and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5462, September 2023, pp. 99-III-5 – 99-III-8, 99-III-272, 99-III-275, 99-III-279.

²⁹ Imports of steel articles, including CDMT, originating in EU member countries, including Germany and Italy, were initially exempted from the section 232 tariffs, effective March 23, 2018 (83 FR 13361, March 28, 2018); but these duty exemptions were not continued, effective June 1, 2018 (83 FR 20683, May 7, 2018); until being restored subject to annual TRQs, effective between January 1, 2022, and December 31, 2023. The President indicated that “the United States will monitor the implementation and effectiveness of the tariff-rate quota and other measures agreed upon with the EU in addressing our national security needs” and that he “may revisit this determination, as appropriate.” (87 FR 11, January 3, 2022).

See also HTS heading 9903.80.01, 9903.80.84, and U.S. notes 16(a) and 16(b) to subchapter III of chapter 99 and related tariff provisions for this duty treatment. USITC, HTSUS (2023) Revision 11, USITC Publication 5462, September 2023, pp. 99-III-5 – 99-III-8, 99-III-272, 99-III-275, 99-III-279, 99-III-282, 99-III-289, 99-III-292 – 99-III-293.

Table I-15
CDMT: Subject sources, section 232 steel quota limits, usages, and fill rates, 2022

Limits and usages in short tons, fill rates in percent

Source	Quota type	Item	Mechanical tubing and other products	Pipes and tubes, not specifically provided elsewhere	Total
Germany	Tariff-rate	Limit	42,382	715	43,097
Germany	Tariff-rate	Usage	25,740	219	25,959
Germany	Tariff-rate	Fill rate	60.7	30.7	60.2
Italy	Tariff-rate	Limit	12,434	341	12,775
Italy	Tariff-rate	Usage	10,153	104	10,256
Italy	Tariff-rate	Fill rate	81.7	30.4	80.3
South Korea	Absolute	Limit	9,301	496	9,797
South Korea	Absolute	Usage	5,930	162	6,092
South Korea	Absolute	Fill rate	63.8	32.6	62.2

Source: CBP, “2022 Fourth Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Countries,” Quota Bulletin No. QB 22-614, December 16, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-614-2022>; CBP, “European Union Steel TRQ 2022 Annual Totals,” September 25, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Sep/European_Union_Steel_TRQ_2022_Annual_Totals.pdf; CBP, “2022 Fourth Quarter Absolute Quota for Steel Articles of Argentina, Brazil and South Korea,” Quota Bulletin No. QB 22-604, August 3, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022>; CBP, “Steel Quarter Usage 2022,” January 30, 2023, <https://www.cbp.gov/document/publications/steel-quarter-usage-2022>.

Note: CBP Quota ID categories with HTS statistical reporting numbers for CDMT: (1) Germany and the Netherlands TRQs—9903.80.84: Mechanical tubing and other products (HTS subheadings 7304.31.30 and 7304.51.10; and HTS statistical reporting numbers 7304.31.6050, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030) and 9903.80.87: Pipes and tubes, not specially provided for elsewhere (HTS statistical reporting number 7304.51.5005) and (2) South Korea absolute quotas—9903.80.24: Mechanical tubing and other products 9903.81.34 (HTS subheadings 7304.31.30 and 7304.51.10; and HTS statistical reporting numbers 7304.31.6050, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030) and 9903.80.27: Pipes and tubes, not specially provided for elsewhere (HTS statistical reporting number 7304.51.5005). These quota categories also include numerous other HTS statistical reporting numbers for out-of-scope products.

Table I-16
CDMT: Subject sources, section 232 steel quota limits, usages, and fill rates, first-half 2023

Limits and usages in short tons, fill rates in percent

Source	Quota type	Item	Mechanical tubing and other products	Pipes and tubes, not specifically provided elsewhere	Total
Germany	Tariff-rate	Limit	21,191	358	21,549
Germany	Tariff-rate	Usage	11,657	77	11,733
Germany	Tariff-rate	Fill rate	55.0	21.5	54.5
Italy	Tariff-rate	Limit	6,217	170	6,387
Italy	Tariff-rate	Usage	3,707	90	3,798
Italy	Tariff-rate	Fill rate	59.6	53.1	59.5
South Korea	Absolute	Limit	5,581	992	6,572
South Korea	Absolute	Usage	3,306	136	3,442
South Korea	Absolute	Fill rate	59.2	13.7	52.4

Source: CBP, “European Union Section 232 Steel Tariff Rate Quota 2023 Q1 and Q2,” January 10, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jan/EU%20Steel%20TRQ%20Limit%20Table%202023_Q1_Q2.pdf; CBP, “European Union Section 232 Steel Tariff Rate Quota Quarter 1 Usage / Quarter 3 Limits 2023,” June 14, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jun/EU_Steel_TRQ_Limit_Table_Q1_Usage_Q3_Limits_2023.pdf; CBP, “European Union Section 232 Steel Tariff Rate Quota Quarter 2 Usage / Quarter 4 Limits 2023,” September 21, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Sep/EU_Steel_TRQ_Limit_Table_Q2_Usage_Q4_Limits_2023.pdf; CBP, “2023 First Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” Quota Bulletin No. QB 23-601, December 12, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-23-601-2023>; CBP, “2023 Second Quarter Absolute Quota for Steel Mill Articles of Argentina, Brazil and South Korea,” Quota Bulletin No. QB 23-602, March 9, 2023, <https://www.cbp.gov/trade/quota/bulletins/qb-23-602>; CBP, “2023 Annual Usage by Quarter - Absolute Steel and Aluminum Report, Steel Usage 2023,” July 20, 2023, https://www.cbp.gov/sites/default/files/assets/documents/2023-Jul/STEEL%20USAGE%202023%20Q2_0.pdf.

Note: CBP Quota ID categories with HTS statistical reporting numbers for CDMT: (1) Germany and the Netherlands TRQs—9903.80.84: Mechanical tubing and other products (HTS subheadings 7304.31.30 and 7304.51.10; and HTS statistical reporting numbers 7304.31.6050, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030) and 9903.80.87: Pipes and tubes, not specially provided for elsewhere (HTS statistical reporting number 7304.51.5005) and (2) South Korea absolute quotas—9903.80.24: Mechanical tubing and other products 9903.81.34 (HTS subheadings 7304.31.30 and 7304.51.10; and HTS statistical reporting numbers 7304.31.6050, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030) and 9903.80.27: Pipes and tubes, not specially provided for elsewhere (HTS statistical reporting number 7304.51.5005). These quota categories also include numerous other HTS statistical reporting numbers for out-of-scope products.

Under Section 232, the President authorized the Secretary of Commerce, in consultation with other appropriate federal agency heads, to provide relief from the additional duties for any steel articles determined “not to be produced in the United States in a sufficient and reasonably available amount or of a satisfactory quality and is also authorized to provide such relief based upon specific national security considerations. Such relief shall be provided for any article only after a request for exclusion is made by a directly affected party located in the United States.”³⁰ Commerce reviews all exclusion requests and any objections, rebuttals, and sur-rebuttals to the requests and determines whether the items are warranting an exclusion based on the above criteria.³¹

On December 14, 2020, Commerce published an interim final rule (the “December 14 rule”)³² that revised aspects of the process for requesting exclusions from the duties and quantitative limitations on imports of aluminum and steel discussed in three previous Commerce interim final rules implementing the exclusion process authorized by the President under Section 232 of the Trade Expansion Act of 1962, as amended, as well as a May 26, 2020,

³⁰ 83 FR 45025, September 4, 2018.

³¹ If an organization that manufactures steel products in the United States wants to object to an existing exclusion request, it has 30 days from the posting of an exclusion request to submit an objection. Any individual or organization in the United States may file an objection to an exclusion request. For an objection filing to be considered, organizations must provide factual information on: 1) The steel products that they manufacture in the United States; 2) The production capabilities at steel manufacturing facilities that they operate in the United States; and 3) The availability and delivery time of the products that they manufacture relative to the specific steel product that is subject to an exclusion request. Commerce reviews each objection for conformance with the submission requirements. If the objection meets the requirements, it will be posted. Once an objection is posted, then Commerce will re-open the exclusion request for a rebuttal period of 7 calendar days. U.S. Bureau of Industry and Security (“BIS”), “Section 232 National Security Investigation of Steel Imports, Information on the Exclusion Process,” December 20, 2023, <https://www.bis.doc.gov/index.php/232-steel>.

³² 85 FR 81060, December 14, 2020.

notice of inquiry. The December 14 rule included adding 123 General Approved Exclusions (GAEs) to the regulations.³³ GAEs may be used by any importer and are indefinite in length.³⁴

Section 232 exclusions are not generally applicable to all imports under each HTS statistical reporting number or to imports from all countries. Therefore, even if an exclusion refers to a specific HTS statistical reporting number, it may not cover imports of subject merchandise and/or may only cover a portion of imports of subject merchandise. Each granted exclusion is specific to certain criteria listed below:³⁵

- 1) **A granted exclusion is only applicant-specific** (*i.e.* can only be used by the applicant who must be a “directly affected individuals or organizations located in the United States” which is generally an importer of record but may also be an end-user);
- 2) **is supplier-specific;**

³³ GAEs address a long-standing request from public comments of exclusion requesters to create a more efficient process to approve certain exclusions for use by all importers where Commerce has determined that no objections will be received and where it is warranted to approve an exclusion for all importers to use. Determinations for what steel or aluminum articles warrant being included in a GAE were made by Commerce, in consultation with other Federal agencies. The public was not involved in requesting new or revised GAEs, but Commerce uses the information provided in exclusion requests to inform its review process for what additional GAE should be added or what revisions should be made to existing GAEs. On December 9, 2021, Commerce subsequently suspended 30 GAEs on the Section 232 exclusions process because they were determined to no longer fit the criteria of a GAE. 86 FR 70003, December 9, 2021.

³⁴ Presidential Proclamation 10328 published on January 3, 2022, directed Commerce to seek public comment on the Section 232 exclusions process, including the responsiveness of the exclusions process to market demand and enhanced consultation with U.S. firms and labor organizations. 87 FR 11, January 3, 2022. On August 28, 2023, based on a review of the existing Section 232 exclusion process for areas of improvement and public comments on the current process for submissions, Commerce published a proposed rule that revised aspects of the process for requesting exclusions. The proposed rule includes the following four key changes: (1) It changes the criteria that has generally been used for identification of GAEs from HTSUS statistical reporting numbers that have received no objections to HTSUS classification codes with very low rates of successful objections; (2) It introduces a General Denied Exclusions (“GDE”) process that is comparable to the GAE process, in which GDEs will generally be implemented if, among other things, the HTSUS classification code (or subproducts) have very high rates of successful, substantiated objections; (3) It modifies the existing certification language and introduces new certification requirements for exclusion requests to document sourcing attempts; and (4) It proposes similar certification language on the objection form to further ensure objectors can supply comparable quality and quantity steel or aluminum and make it “immediately available” to requestors. 88 FR 58525, August 28, 2023.

³⁵ The criteria presented in the list were derived from BIS, “Section 232 National Security Investigation of Steel Imports Information on the Exclusion Process,” December 20, 2023, <https://www.bis.doc.gov/index.php/232-steel>; 83 FR 12106, March 19, 2018; BIS, “Section 232 Frequently Asked Questions,” ver. 1.01, June 19, 2019, <https://www.bis.doc.gov/index.php/documents/section-232-investigations/2409-section-232-faq/file>, pp. 11–12.

- 3) **is product-specific** (not only must a single 10-digit HTSUS code, be listed, including its specific dimension, but a full description of the properties of the steel product it seeks to import, including chemical composition, dimensions, strength, toughness, ductility, magnetic permeability, surface finish, coatings, and other relevant data);
- 4) **is country(ies) of origin-specific** (can only cover imports from specific country(ies) listed in a request);
- 5) **is limited by the volume listed in the request** (an applicant must certify that the exclusion “amount requested in a given year is in line with what the organization expects to import based on its current business outlook”); and
- 6) **is limited to one year** (applicants must re-apply to use the exclusion after a year).

A product exclusion will be granted if the article is not produced in the United States: (1) in sufficient and reasonably available amount, (2) satisfactory quality, or (3) there is a specific national security consideration warranting an exclusion. Applicants must list one of these as a reason for the request and must certify that the reason for the request is correct and accurate to the best of their knowledge.

Excluded steel articles, including any CDMT, do not count toward filling the annual TRQs for the EU member countries, effective January 1, 2022.³⁶ Conversely, these “quota exclusion entries” do count toward filling the annual quotas for Argentina, Brazil, and South Korea, effective August 30, 2018;³⁷ and the annual TRQs for Japan, effective April 1, 2022;³⁸ and the annual TRQs for the United Kingdom, effective June 1, 2022.³⁹ Imports of excluded products (“quota exclusion entries”) are counted against the quarterly quota in place at the time of entry and count toward the annual quota. However, as they are exempt from both the quarterly and annual quotas, they continue to be accepted until closure of the annual quota period. CBP tracks and reports exclusion quarterly or annual “exclusion quota overflow” quantities.⁴⁰

³⁶ 87 FR 11, January 3, 2022; CBP, “Fourth Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Countries,” Quota Bulletin No. QB 22-614 2022, December 16, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-614-2022>.

³⁷ 83 FR 45025, September 4, 2018.

³⁸ 87 FR 19351, April 1, 2022.

³⁹ 87 FR 33591, June 3, 2022.

⁴⁰ Exclusion quota overflow quantities are designated with the “ALXC” suffix in the CBC quota fill reports for Argentina, Brazil, and South Korea; and with the “STXC” suffix for the reports for Japan and the United Kingdom. CBP, “Fourth Quarter Absolute Quota for Steel Articles of Argentina, Brazil and South Korea,” Quota Bulletin No. QB 22-604 2022, October 3, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-604-2022>; CBP, “4th Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of Japan or the United Kingdom,” Quota Bulletin No. QB 22-624 2022, December 16, 2022, <https://www.cbp.gov/trade/quota/bulletins/qb-22-624-2022>.

In these first five-year reviews, U.S. importers were asked to report the quantity of their U.S. imports of CDMT that entered the United States utilizing a granted exclusion from section 232 measures during calendar year 2022. Seven U.S. importers reported such data in their responses to the Commission’s questionnaire (table I-17). According to these data, in 2022, the reported U.S. imports from China utilizing a granted exclusion accounted for *** percent of U.S. imports from China reported in questionnaire responses. Reported U.S. imports from Germany utilizing a granted exclusion in 2022 accounted for *** percent of U.S. imports from Germany reported in questionnaire responses. Reported U.S. imports from India utilizing a granted exclusion in 2022 accounted for *** percent of U.S. imports from India reported in questionnaire responses. Reported U.S. imports from South Korea utilizing a granted exclusion in 2022 accounted for *** percent of U.S. imports from South Korea reported in questionnaire responses. Reported U.S. imports from Switzerland utilizing a granted exclusion in 2022 accounted for *** percent of U.S. imports from Switzerland reported in questionnaire responses.⁴¹ There were *** reported U.S. imports from Italy utilizing a granted exclusion in 2022.

Table I-17
CDMT: Reported U.S. imports utilizing a granted exclusion from section 232 measure, by importer and source, 2022

Quantity in short tons

Firm	China	Germany	India	Italy	South Korea	Switzer-land	Subject sources
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
Total	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

⁴¹ Reported U.S. imports that utilized a granted exclusion accounted for *** percent of total subject imports of CDMT from China, *** percent of total subject imports from Germany, *** percent of total subject imports from India, *** percent of total subject imports from South Korea, and *** percent of total subject imports from Switzerland. Calculated from table IV-1.

Chapter 99 of the HTS provides for products for which temporary tariff modifications apply pursuant to trade legislation such as sections 232 and 301, among other provisions. U.S. imports of CDMT from subject countries that were subject to chapter 99 provisions of the HTS (including separate U.S. import data for which (1) an additional duty was paid or (2) was not dutiable) are presented in appendix E.⁴²

⁴² U.S. imports presented in app. E are believed to be somewhat overstated, as they include both in-scope CDMT and out-of-scope products. Regarding imports from the EU (i.e., Germany and Italy), “No CH 99 HTS number is required for EU steel TRQ exclusion handling.” CBP, “2022 Third Quarter Tariff Rate Quota (TRQ) for Steel Mill Articles of European Union (EU) Member Countries,” Quota Bulletin No. QB 22-613, August 7, 2023, <https://www.cbp.gov/trade/quota/bulletins/qb-22-613>. However, regarding imports from South Korea, all exclusion entries “utilize HTS 9903.80.60.” CBP, “Absolute Quota for Steel Mill Articles: Argentina, Brazil and South Korea,” Quota Bulletin No. QB 21-601, June 12, 2023, <https://www.cbp.gov/trade/quota/bulletins/qb-21-601-absolute-quota-steel-mill-articles-argentina-brazil-and-south-korea>. Regarding imports from the remaining countries not subject to a TRQ or absolute quota, entrants for products subject to Section 232 duties, but that are utilizing an exclusion “{d}o not submit the corresponding Chapter 99 HTS number.” CBP, “CSMS # 55844950 - Revised Guidance: Processing Approved Section 232 Product Exclusions,” April 10, 2023, <https://content.govdelivery.com/accounts/USDHSCBP/bulletins/3542056>.

The product

Description and applications⁴³

The merchandise covered by these investigations is certain CDMT of either carbon or alloy steel. The subject CDMT is a tubular product with a circular cross-sectional shape that has been cold-drawn or otherwise cold finished to change its diameter, wall thickness, or both. The subject CDMT may be produced from either welded or seamless carbon or alloy steel tubular products.

After cold working, the CDMT may also be heat treated (annealed, normalized, quenched and tempered, stress relieved or finish annealed). Typical cold drawing methods for the subject CDMT include, but are not limited to, drawing over mandrel, rod drawing, and sink drawing. Production via cold-drawing or another cold-finished process is an essential characteristic of the subject merchandise.

The subject CDMT has unique physical characteristics imparted by the cold drawing or other cold finishing processes that differentiate it from the welded or seamless tubing products from which it is produced. Cold drawing gives the mechanical tubing its dimensional tolerances (outside diameters, wall thickness, and inside diameters); and its specific and enhanced mechanical properties such as higher yield strength, higher tensile strength, elongation, hardness, and increased strength to weight ratio; superior finish; superior machinability; and precise shape (concentricity and eccentricity).

CDMT has numerous applications and uses based upon its physical and mechanical characteristics imparted by the cold-drawing process, including for production of bushings, spacers, bearings, axles, steering columns, hydraulic cylinders, and other mechanical parts in transportation (e.g., automobile, truck, and aircraft) components, construction applications, as well as in agricultural and oil and gas drilling equipment.

⁴³ Unless otherwise noted, this information is based on the original CVD publication, pp. I-3, I-12 – I-13.

Manufacturing processes⁴⁴

CDMT, whether starting from either welded or seamless steel tubing, is subject to the same drawing processes on the same equipment. During the cold drawing process, the mechanical tubing goes through five distinct steps: (1) procuring the raw material; (2) preparing the raw material for drawing; (3) drawing; (4) straightening; and (5) finishing and final inspection. During the procurement process, raw material (whether a welded or seamless steel tube) is obtained based on the specifications for the mechanical tubing's chemistry and ultimate dimensions after drawing (including outside diameter, wall thickness, concentricity, and straightness).⁴⁵ These requirements may be included in a proprietary specification or in an ASTM, AMS, or MIL code or specification.

The differentiation of choice between seamless or welded CDMT is physical in nature as some steels are not as weldable due to their alloy content and wall thickness. If the wall thickness is three-fourths of an inch or more, it is impractical to make a welded product and the CDMT will likely be seamless.⁴⁶

Welded pipe manufacturing process

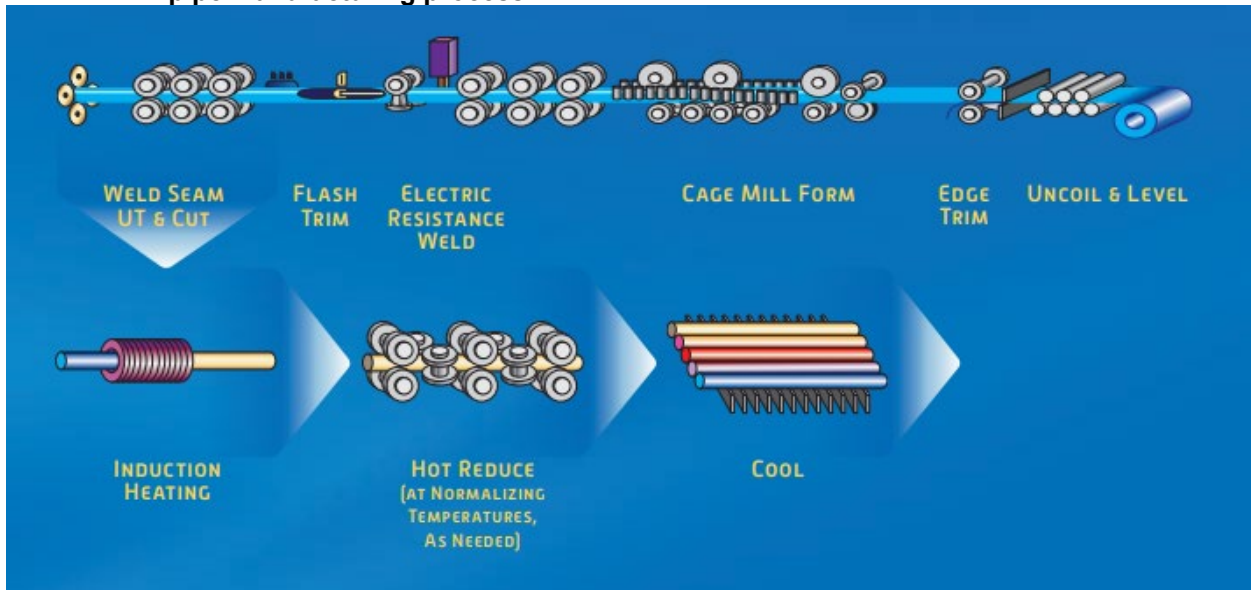
The most common method of producing welded pipe by U.S. mills is the electric resistance weld ("ERW") process. The ERW process begins with coils of hot-rolled sheet steel, which are cut by a slitting machine into strips of the precise width needed to produce a desired diameter of pipe. The slit coils are fed into the tube mills, which cold form the flat ribbon of steel into a tubular cylinder by a series of tapered forming rolls. The product then is welded along the joint axis. The welded tube next passes under a tool that removes the outside flash resulting from the pressure during welding. Inside flash is likewise removed by cutting tools. The tube is then subjected to any required post-welding heat treatment. Such treatment may involve heat treatment of the welded seam only or of the full cross-section of the pipe. After heat treatment, sizing rolls shape the tube to specific diameter tolerances. The product is cooled and then cut to size at the end of the tube mill (figure I-2).

⁴⁴ Unless otherwise noted, this information is based on the original CVD publication, pp. I-13 – I-17.

⁴⁵ The CDMT manufacturing process is predominantly determined by end-use applications and customer specifications of the product. Therefore, typically CDMT products are made-to-order and specific to consumer customizations. Hearing transcript, pp. 21, 60, 83 (Hart), 85-86 (Vore), and 86-87 (Hart).

⁴⁶ Hearing transcript, p. 82 (Vore).

Figure I-2
CDMT: ERW pipe manufacturing process



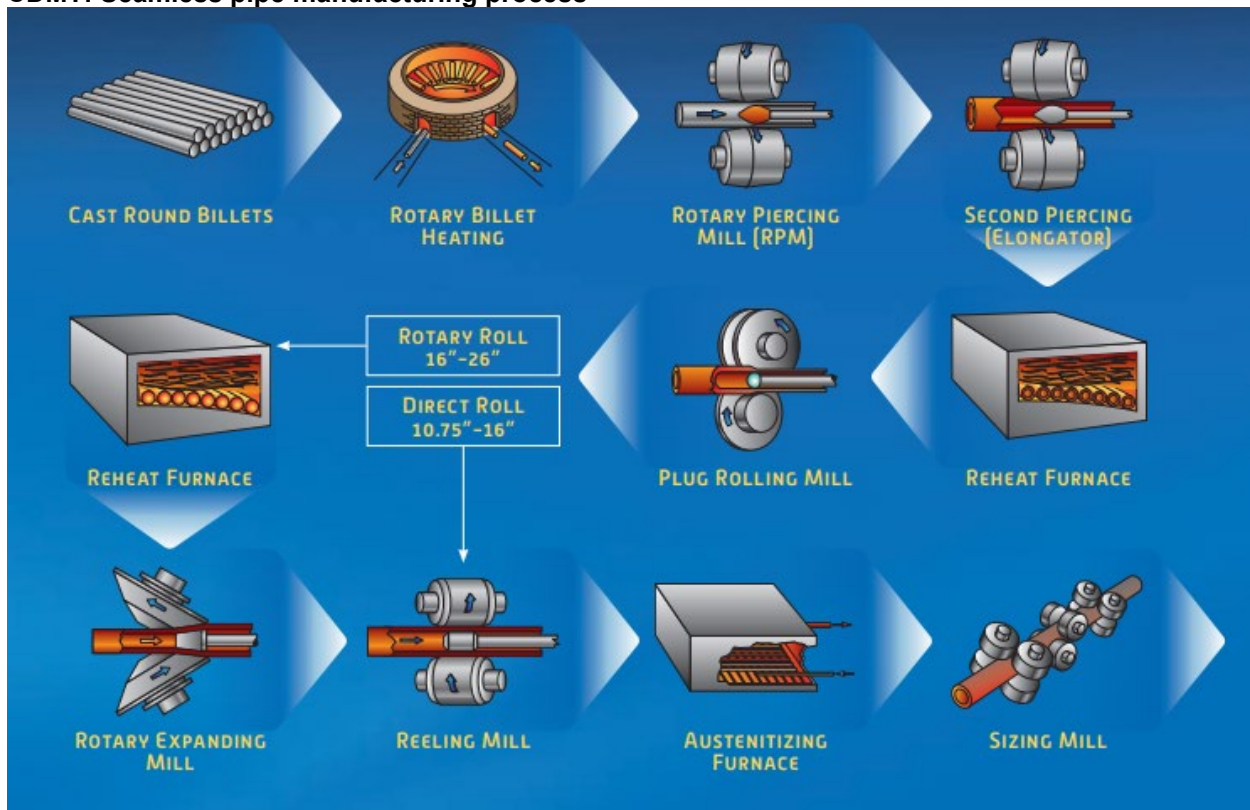
Source: U.S. Steel Tubular Products, Standard Pipe & Line Pipe, Rev. 5, August 2019, p. 14, <https://usstubular.com/resources/library/brochures-and-catalogs/standard-line-pipe-catalog/>.

Note: The manufacturing process presented in this figure is the process used at the U.S. Steel mill in Lone Star, Texas. The ERW process may differ somewhat at other companies, but the basic ERW process is similar at all mills.

Seamless pipe manufacturing process

To produce seamless pipe, molten steel is cast into round billets which are the starting materials. Seamless pipe is typically manufactured by a rotary piercing process which forms a central cavity in a solid steel billet under high temperature. A heated billet is gripped by angled rolls that cause the billet to rotate and advance over a piercer point, forming a hole through the billet's length. The hollow shell that is produced is then rolled with either a fixed plug or a continuous mandrel inside the shell to reduce the wall thickness and increase the length. The shell is then rolled in a sizing mill or a stretch reduction mill where it is formed into a true round and sized to the specified diameter (figure I-3).

Figure I-3
CDMT: Seamless pipe manufacturing process



Source: U.S. Steel, U.S. Steel Tubular Products, Standard Pipe & Line Pipe, Rev. 5, August 2019, p. 16, <https://usstubular.com/resources/library/brochures-and-catalogs/standard-line-pipe-catalog/>.

Note: The manufacturing process presented in this figure is the process used at the U.S. Steel mill in Lorain, Ohio. The seamless pipe manufacturing process may differ somewhat at other companies, but the basic process is similar at all mills.

Although CDMT produced from either welded or seamless tube is largely interchangeable when produced to the same wall thicknesses, grades, and diameters, there are applications where either CDMT from welded tube or CDMT from seamless tube is preferred. CDMT drawn from welded tube has tighter dimensional tolerances than CDMT drawn from seamless tube. CDMT drawn from seamless tube is preferred by some purchasers in pressure applications. Also, CDMT produced from welded tube is typically less expensive than CDMT produced from seamless tube.

Cold drawing process

The tubing, whether welded or seamless, is prepared for drawing by a process known as “pointing,” which involves reducing the diameter at the end of the tubing to allow the tubing to enter the drawing die. In most cases, a phosphate coating or soap film is applied before drawing.

The subsequent drawing process may involve drawing over mandrel ("DOM"), hollow drawing, plug drawing, or sinking.⁴⁷ Draw benches are usually mechanical and have three components: a back bench, die head, and front section. Jaws on a trolley grip the tube and a hook on the back of the trolley engages a moving chain to pull the tube through a die. Dies usually consist of sintered tungsten carbide inserts with a cobalt binder that have been shrunk fit into a steel casing.

During the DOM process, the tube is pulled through the die using an inserted mandrel bar. The tube's outside and inside diameters and its resulting wall thickness undergo reduction at this stage. To enable the mandrel to then be extracted, the tube must be slightly expanded in a reeling mill. During plug drawing, the tube is drawn through a die that includes a plug that is either "stationary" (fixed to a mandrel bar) or "floating" (non-fixed). As a result, both the inside and outside diameters of the tube are again reduced, as well as smoothed and polished. In contrast, during hollow drawing, only the outside diameter of the tube is reduced such that the wall thickness may undergo virtually no change. Depending on the starting size of the feedstock, the desired finished size of the drawn tubing, and the desired mechanical characteristics of the finished tubing, the product may need to be drawn over two or more passes.

Drawing tends to make the product harder, more brittle, and less malleable. As a result, the CDMT may undergo heat treatment (annealing) after drawing. Heat treatment involves heating the drawn tubing to a particular temperature for a specified period and then cooling it at a specified rate. Heat treatment relieves stress in the tubing caused by the drawing and imparts the final mechanical characteristics of the finished tubing.

Other cold finishing processes

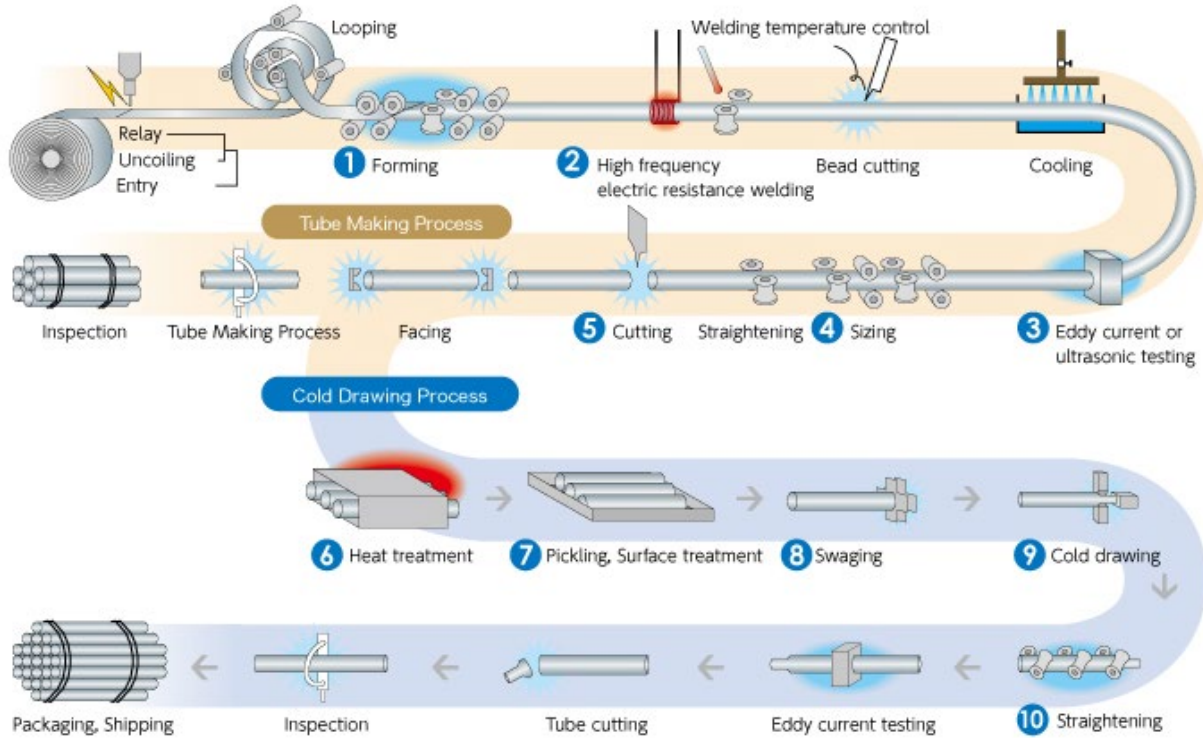
There are cold finishing processes that can be used instead of cold drawing to produce merchandise within the scope of these investigations. One such process is cold sizing (a cold-rolling process), in which a welded pipe passes through a series of rolls that use compression to change the tube's dimensions. No U.S. producer uses this process to make CDMT.

The tubing then undergoes straightening. This step typically involves using a rotary straightener that applies a combination of flex and pressure. Finally, the finishing step for CDMT may involve polishing, pickling, or sandblasting to improve the tube's surface finish and remove

⁴⁷ Sinking is the term for drawing a tube with no internal support. It is usually performed as a sizing pass after a rod draw.

surface imperfections. The product may also be cut into specified length and have the ends deburred or chamfered (figure I-4).⁴⁸

Figure I-4
CDMT: Cold-drawn tube manufacturing process



Source: Nippon Steel Co. Ltd., “Manufacturing Process/Major Equipment,” <http://www.nspc.nssmc.com/en/products/process.html>, retrieved March 3, 2023.

Note: The process illustrated in the figure is the cold drawing of a welded tube from the formation of the welded tube through the cold drawing.

⁴⁸ Deburring removes the burrs (small metal fragments) that may remain on the end of a cut tube. Chamfering is a machining process that removes the sharp end of a cut tube by altering the angle between the prepared edge of the end of the pipe and a plane perpendicular to its surface.

Domestic like product issues

In its original determinations, the Commission defined a single domestic like product consisting of all CDMT coextensive with Commerce's scope.⁴⁹ In its notice of institution in these current five-year reviews, the Commission solicited comments from interested parties regarding the appropriate domestic like product and domestic industry.⁵⁰ The domestic interested parties indicated that they agree with the Commission's definitions of the domestic like product and domestic industry, whereas the Italian interested parties have not objected to the Commission's definitions.⁵¹ No party requested that the Commission collect data concerning other possible domestic like products in their comments on the Commission's draft questionnaires.⁵²

U.S. market participants

U.S. producers

During the original investigations, eight firms supplied the Commission with information on their U.S. operations with respect to CDMT. The eight responding firms accounted for the vast majority of production of CDMT in the United States during 2016.⁵³

⁴⁹ Original CVD publication, p. 15; and Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland, Inv. Nos. 731-TA-1362-1367 (Final), USITC Publication 4790, May 2018 ("Original AD publication"), p. 4.

⁵⁰ 88 FR 114, January 3, 2023.

⁵¹ Domestic interested parties' response to the notice of institution, February 2, 2023, p. 16; Dalmine and TGS USA response to the notice of institution, February 2, 2023, p. 11; Marcegaglia and Metalfer response to the notice of institution, February 2, 2023, p. 8.

⁵² Domestic interested parties' comments on draft questionnaires, August 2, 2023; Dalmine and TGS USA comments on draft questionnaires, August 2, 2023.

⁵³ The eight U.S. producers that supplied the Commission with usable questionnaire information during the original investigations were: ArcelorMittal, Michigan Seamless, Plymouth, PTC Alliance, Seymour Tubing, Sharon Tube (Zekelman Industries), Timken, and Webco. Original CVD publication, p. I-4 and table III-4.

In this current proceeding, the Commission issued questionnaires to seven firms believed to be U.S. producers of CDMT, six of which provided the Commission with information on their CDMT operations.⁵⁴ These six firms are believed to have accounted for greater than 90 percent of U.S. production of CDMT in 2022. Presented in table I-18 is a list of current domestic producers of CDMT and each company’s position on the continuation of the orders, production location, and share of reported production of CDMT in 2022.

Table I-18
CDMT: U.S. producers, positions on continuation of orders, U.S. production locations, and shares of reported U.S. production, 2022

Share in percent

Firm	Position on orders	Production location(s)	Share of production
ArcelorMittal	***	Shelby, OH Marion, OH	***
Michigan Seamless	***	South Lyon, MI	***
Nippon Steel	***	Seymour, IN	***
PTC Alliance	***	Alliance, OH Darlington, PA Chicago Heights, IL Beaver Falls, PA Fairbury, IL Bedford Park, IL Middletown, OH Minneapolis, MN	***
Sharon Tube	***	Farrell, PA Niles, OH	***
Webco	***	Sand Springs, OK Oil City, PA Reno, PA	***
All firms	Various	Various	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

⁵⁴ Plymouth Tube Co. USA did not respond to the Commission’s questionnaire.

As indicated in table I-19, two U.S. producers are related to foreign producers of CDMT.⁵⁵ No responding U.S. producers directly import CDMT into the United States and no responding U.S. producers are related to U.S. importers of CDMT. As discussed in greater detail in Part III, one U.S. producer (***) purchases CDMT from U.S. importers.

Table I-19
CDMT: U.S. producers' ownership, related and/or affiliated firms

Reporting firm	Relationship type and related firm	Details of relationship
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

⁵⁵ U.S. producer *** is related to producers of CDMT in ***. U.S. producer *** is related to producers of CDMT in ***. With regard to related firms in ***.

U.S. importers

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from 50 firms, which accounted for approximately *** percent of U.S. imports of CDMT from China, *** percent from Germany, *** percent from India, *** percent from Italy, *** percent from South Korea, and *** percent from Switzerland during 2016.⁵⁶ Of the responding U.S. importers, two were domestic producers. Domestic producers *** directly imported CDMT ***.⁵⁷

In the current proceedings, the Commission issued U.S. importers' questionnaires to more than 300 firms identified as possible importers of CDMT, as well as to all U.S. producers of CDMT. Usable questionnaire responses were received from 25 firms, representing *** percent of U.S. imports of CDMT from China, *** percent from Germany, *** percent from India, *** percent from Italy, *** percent from South Korea, *** percent from Switzerland, *** percent of imports from subject sources, *** percent from nonsubject sources, and *** percent of total U.S. imports during 2022.⁵⁸ Table I-20 lists all responding U.S. importers of CDMT from China, Germany, India, Italy, South Korea, and Switzerland and other sources, their locations, and their shares of U.S. imports in 2022.

⁵⁶ Investigation Nos. 701-TA-576-577 and 731-TA-1362-1367 (Final): Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, Korea, and Switzerland, Confidential Report, INV-PP-168, December 22, 2017, as revised in INV-QQ-001, January 2, 2018, and INV-QQ-003, January 5, 2018, and supplemented in INV-QQ-055, May 8, 2018, ("Original confidential report"), pp. IV-1-IV-2.

⁵⁷ Original confidential report, p. III-3.

⁵⁸ See table I-20 and note for coverage calculations.

Table I-20
CDMT: U.S. importers, their headquarters, and share of imports within each source in 2022, by firm

Share in percent

Firm	Headquarters	China	Germany	India	Italy	South Korea	Switzerland
American Piping	Chesterfield, MO	***	***	***	***	***	***
Ameri-Source	Bethel Park, PA	***	***	***	***	***	***
Artrom Steel	Slatina, Olt County, Romania	***	***	***	***	***	***
Benteler	Houston, TX	***	***	***	***	***	***
BWI	Greenfield, IN	***	***	***	***	***	***
Dadco	Plymouth, MI	***	***	***	***	***	***
Dexter Sales	Brooklyn, NY	***	***	***	***	***	***
Emerald	Houston, TX	***	***	***	***	***	***
Flexpipe	Farnham, QC, Canada	***	***	***	***	***	***
Fortis Alliance	Houston, TX	***	***	***	***	***	***
Golden Beam	Indianapolis, IN	***	***	***	***	***	***
Karay	Kingston, NY	***	***	***	***	***	***
KIP Steel	Fullerton, CA	***	***	***	***	***	***
Koide	Rockford, TN	***	***	***	***	***	***
Metalfer	Volciano, BS	***	***	***	***	***	***
Metal One	Rosemont, IL	***	***	***	***	***	***
Ovako	Charlotte, NC	***	***	***	***	***	***
PerCor Manufacturing	Wyoming, MI	***	***	***	***	***	***
Scot Industries	Lone Star	***	***	***	***	***	***
Sourcing Systems	Mountlake Terrace, WA	***	***	***	***	***	***
Tenaris	Houston, TX	***	***	***	***	***	***
Transmesa	Sterling Heights, MI	***	***	***	***	***	***
Tube Fabrication	Logansport, IN	***	***	***	***	***	***
Universal Tube	Rochester Hills, MI	***	***	***	***	***	***
West Craft	Alto, TX	***	***	***	***	***	***
Coverage	Various	***	***	***	***	***	***
All other firms	Various	***	***	***	***	***	***
Total	Various	***	***	***	***	***	***

Table continued.

Table I-20 Continued
CDMT: U.S. importers, their headquarters, and share of imports within each source in 2022, by firm

Share in percent

Firm	Headquarters	Subject sources	Nonsubject sources	All import sources
American Piping	Chesterfield, MO	***	***	***
Ameri-Source	Bethel Park, PA	***	***	***
Artrom Steel	Slatina, Olt County, Romania	***	***	***
Benteler	Houston, TX	***	***	***
BWI	Greenfield, IN	***	***	***
Dadco	Plymouth, MI	***	***	***
Dexter Sales	Brooklyn, NY	***	***	***
Emerald	Houston, TX	***	***	***
Flexpipe	Farnham, QC, Canada	***	***	***
Fortis Alliance	Houston, TX	***	***	***
Golden Beam	Indianapolis, IN	***	***	***
Karay	Kingston, NY	***	***	***
KIP Steel	Fullerton, CA	***	***	***
Koide	Rockford, TN	***	***	***
Metalfer	Volciano, BS	***	***	***
Metal One	Rosemont, IL	***	***	***
Ovako	Charlotte, NC	***	***	***
PerCor Manufacturing	Wyoming, MI	***	***	***
Scot Industries	Lone Star, TX	***	***	***
Sourcing Systems	Mountlake Terrace, WA	***	***	***
Tenaris	Houston, TX	***	***	***
Transmesa	Sterling Heights, MI	***	***	***
Tube Fabrication	Logansport, IN	***	***	***
Universal Tube	Rochester Hills, MI	***	***	***
West Craft	Alto, TX	***	***	***
Coverage	Various	***	***	***
All other firms	Various	***	***	***
Total	Various	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Note: Coverage data presented for “All other firms” are compiled from proprietary, Census-edited Customs records for “nonresponding firms.” “Responding firms” include the 25 firms which provided usable questionnaire responses and the 88 firms which indicated that they have not imported CDMT into the United States since January 1, 2017. Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

U.S. purchasers

The Commission received 23 usable questionnaire responses from firms that purchased CDMT since January 1, 2017.⁵⁹ *** responding purchasers are distributors, *** is an agriculture end user, *** are automotive end users, *** are industrial end users, *** is an oil and gas end user, and *** are other end users (i.e., mining, manufacturer/processor, and machinist). The responding U.S. purchasers are located in the Midwestern states of Illinois, Iowa, Michigan, Missouri, and Wisconsin, as well as the Southern and Western states of California, South Carolina, Tennessee, Texas, and West Virginia. Large purchasers of CDMT include ***.

Apparent U.S. consumption and market shares

Quantity

Table I-21 and figure I-5 present data on apparent U.S. consumption and U.S. market shares by quantity for CDMT. Apparent U.S. consumption declined overall by *** percent from 2017 to 2020 before increasing in 2021 and 2022 to a level in 2022 that was *** percent lower than reported in 2017. Apparent U.S. consumption was *** percent lower during January-June (“interim”) 2023 compared with interim 2022. The largest changes in apparent U.S. consumption occurred during 2019-20, when apparent U.S. consumption decreased by approximately *** short tons (*** percent) and during 2020-21, when apparent U.S. consumption increased by approximately *** short tons (*** percent). The decrease from 2019 to 2020 reflected decreases in U.S. producers’ U.S. shipments, imports from subject sources, and imports from nonsubject sources. Similarly, the increase in apparent U.S. consumption from 2020 to 2021 reflected higher U.S. shipments by U.S. producers as well as increases in imports from all sources.^{60 61}

⁵⁹ Of the 23 responding purchasers, *** purchased the domestic product, *** purchased imports of the subject merchandise from China, *** from Germany, *** from India, *** from Italy, *** from South Korea, *** from Switzerland, and *** from nonsubject countries.

⁶⁰ These changes correspond with reported decreases in demand during 2020 due to COVID followed by a rebound from the immediate impacts of the pandemic. U.S. producers’ and importers’ questionnaire responses, section II-2.b.

⁶¹ For further discussions on the trends in U.S. producers’ U.S. shipments, see Part III. For further discussions on trends in subject and nonsubject imports, see Part IV.

Table I-21
CDMT: Apparent U.S. consumption and market share based on quantity, by period and source

Quantity in short tons; share in percent

Source	Measure	2017	2018	2019
U.S. producers	Quantity	382,570	443,330	392,899
China	Quantity	***	***	***
Germany	Quantity	***	***	***
India	Quantity	***	***	***
Italy	Quantity	***	***	***
South Korea	Quantity	***	***	***
Switzerland	Quantity	***	***	***
Subject sources	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
All sources	Quantity	***	***	***
U.S. producers	Share of quantity	***	***	***
China	Share of quantity	***	***	***
Germany	Share of quantity	***	***	***
India	Share of quantity	***	***	***
Italy	Share of quantity	***	***	***
South Korea	Share of quantity	***	***	***
Switzerland	Share of quantity	***	***	***
Subject sources	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
All sources	Share of quantity	***	***	***

Table continued.

Table I-21 Continued
CDMT: Apparent U.S. consumption and market share based on quantity, by period and source

Quantity in short tons; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Quantity	311,705	363,046	379,372	201,715	196,412
China	Quantity	***	***	***	***	***
Germany	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Switzerland	Quantity	***	***	***	***	***
Subject sources	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
All sources	Quantity	***	***	***	***	***
U.S. producers	Share of quantity	***	***	***	***	***
China	Share of quantity	***	***	***	***	***
Germany	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Italy	Share of quantity	***	***	***	***	***
South Korea	Share of quantity	***	***	***	***	***
Switzerland	Share of quantity	***	***	***	***	***
Subject sources	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	***	***	***	***	***
All sources	Share of quantity	***	***	***	***	***

Source: Compiled from data on U.S. shipments submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure I-5
CDMT: Apparent U.S. consumption based on quantity, by period and source

* * * * *

Source: Compiled from data on U.S. shipments submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments.

U.S. producers' market share increased from *** percent in 2017 to *** percent in 2020, declined to *** percent in 2021, and then increased to *** percent in 2022. U.S. producers' market share was *** percent during interim 2023, *** percentage points higher than during interim 2022.

The market shares of U.S. imports from each of the subject sources, except China and India, were *** in every year during 2017-22 and in interim 2022 and interim 2023. The market share for U.S. imports from China ranged from a low of *** percent in 2021 and interim 2022 to a high of *** percent in 2017; whereas the market share for U.S. imports from India ranged from a low of *** percent in 2019 to a high of *** percent in 2021. Overall, subject imports' market share decreased from *** percent in 2017 to *** percent in 2019, increased to *** percent in 2021, and declined to *** percent in 2022. Subject imports' market share was *** percent in interim 2022 and *** percent in interim 2023.

Imports of CDMT from nonsubject sources accounted for a smaller share of apparent U.S. consumption than did imports from subject sources throughout 2017-22 and interim 2023.

The market share of imports from nonsubject sources ranged from a low of *** percent in 2021 and interim 2022 to a high of *** percent in 2019.

Value

Table I-22 and figure I-6 present data on apparent U.S. consumption and U.S. market shares by value for CDMT. During 2017-22, the value of apparent U.S. consumption moved in same direction as quantity, increasing by *** percent from 2017 to 2018, decreasing by *** percent during 2018-20, and then increasing by *** percent during 2020-22. The value of apparent consumption was *** percent lower during interim 2023 compared with interim 2022.⁶²

U.S. producers' market share increased from *** percent in 2017 to *** percent in 2022, and was higher at *** percent in interim 2023 than in interim 2022. The market shares of U.S. imports from each of the subject sources, except India, were *** in every year during 2017-22 and in interim 2022 and interim 2023. The market share for U.S. imports from India ranged from a high of *** percent in interim 2022 to a low of *** percent during 2019. Overall subject imports' market share in terms of value decreased from *** percent in 2017 to *** percent in 2019, but increased to *** percent in 2022. Subject imports' market share was *** percent in interim 2022 and *** percent in interim 2023.

Nonsubject imports' market share by value increased steadily from *** percent to *** percent during 2017-19, then declined to *** percent in 2022. The share of the market held by nonsubject imports was higher at *** percent in interim 2023 than in interim 2022.

⁶² For further discussions on the trends in the value of U.S. producers' U.S. shipments, see Part III. For further discussions on trends in the value of subject and nonsubject imports, see Part IV.

Table I-22
CDMT: Apparent U.S. consumption and market share based on value, by period and source

Value in 1,000 dollars; share in percent

Source	Measure	2017	2018	2019
U.S. producers	Value	683,238	886,795	780,289
China	Value	***	***	***
Germany	Value	***	***	***
India	Value	***	***	***
Italy	Value	***	***	***
South Korea	Value	***	***	***
Switzerland	Value	***	***	***
Subject sources	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	***	***	***
All sources	Value	***	***	***
U.S. producers	Share of value	***	***	***
China	Share of value	***	***	***
Germany	Share of value	***	***	***
India	Share of value	***	***	***
Italy	Share of value	***	***	***
South Korea	Share of value	***	***	***
Switzerland	Share of value	***	***	***
Subject sources	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	***	***	***
All sources	Share of value	***	***	***

Table continued.

Table I-22 Continued
CDMT: Apparent U.S. consumption and market share based on value, by period and source

Value in 1,000 dollars; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. producers	Value	557,262	927,674	1,136,502	631,972	514,988
China	Value	***	***	***	***	***
Germany	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Italy	Value	***	***	***	***	***
South Korea	Value	***	***	***	***	***
Switzerland	Value	***	***	***	***	***
Subject sources	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
All sources	Value	***	***	***	***	***
U.S. producers	Share of value	***	***	***	***	***
China	Share of value	***	***	***	***	***
Germany	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Italy	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Switzerland	Share of value	***	***	***	***	***
Subject sources	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***
All sources	Share of value	***	***	***	***	***

Source: Compiled from data on U.S. shipments submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure I-6
CDMT: Apparent U.S. consumption based on value, by period and source

* * * * *

Source: Compiled from data on U.S. shipments submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments.

Part II: Conditions of competition in the U.S. market

U.S. market characteristics

CDMT is a tubular product that has been cold-drawn or otherwise cold-finished in a way that changes the diameter and/or wall thickness of the tube and is used in equipment that simulates movements such as pushing, pulling, lifting, and carrying. CDMT is used in the production of bushings, spacers, bearings, axles, steering columns, and other mechanical parts for automobiles, trucks, aircrafts, hydraulic cylinders, and other construction, agricultural, and drilling equipment. Because of the wide variety of end uses, CDMT is produced in a wide variety of dimensions and shape tolerances that are often specific to individual customers.¹ As shown in Part IV, U.S. producers primarily sold their CDMT to the automotive and heavy machinery sectors in 2022, followed by agricultural, other end uses, and oil and gas sectors. Subject importers sold a plurality to other end use sectors, followed by heavy machinery, automotive, agricultural, and oil and gas sectors in 2022.

All six U.S. producers, 18 of 19 responding importers, and 12 of 14 responding foreign producers² reported that there have not been changes to product mix or marketing since 2017. Importer *** reported that it cannot market or offer CDMT as requested by its U.S. customers due to the AD/CVD measures in place. Most foreign producers reported that the product range, mix, or marketing of CDMT in their home markets is not different than that for their exports of CDMT to the U.S. or third-country markets. The three firms that reported differences cited wider tolerances in other markets than in their home markets.

Most firms (all 6 U.S. producers, 13 of 18 importers, and 16 of 22 purchasers) indicated that the market was not subject to distinctive conditions of competition; however, five importers and six purchasers indicated that the market was subject to distinctive conditions of competition. The distinctive conditions firms cited were new product development, new steel grades with better performance, changes in technology, “energy process,” transportation costs, scrap availability, utility costs, shipping costs, tariffs/duties/taxes, production capacity, specialized product with limited domestic availability, and lost business to imported completed

¹ *Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, South Korea, and Switzerland, Inv. Nos. 701-TA-576-577 and 731-TA-1362-1367 (Final)*, USITC Publication 4755, January 2018 (“Original publication”), p. II-1.

² The two foreign producers that reported there were changes in the product mix, ***, reported that their ***.

components and cylinders containing steel tubing. Three purchasers *** referenced prices, either increasing domestic prices or decreasing subject prices.

Apparent U.S. consumption of CDMT fluctuated during January 2017-June 2023. Overall, apparent U.S. consumption, by quantity, in 2022 was *** percent lower than in 2017.

Impact of section 301 tariffs and 232 tariffs

U.S. producers, importers, and purchasers were asked to report the impact of section 301 tariffs on overall demand, supply, prices, or raw material costs (table II-1). Most firms responded that they did not know if the section 301 tariffs impacted the CDMT market.

All responding U.S. producers reported that the section 301 measures either did not have an impact on the CDMT market or they did not know. Four importers reported that the section 301 measures had an impact on the CDMT market, three reported that the measures did not have an impact, and 16 did not know. Four purchasers reported that the section 301 measures had an impact on the CDMT market, five reported that the measures did not have an impact, and 14 did not know. The vast majority (13 or 14) of responding foreign producers reported that the section 301 tariffs did not have an impact on their exports of CDMT to the United States.

U.S. producer *** reported no change in supply, demand, price, or raw material costs because of the section 301 tariffs. Responding importers and purchasers reported that supply of CDMT imported from China decreased while supply trends from domestic and other sources were mixed. Most importers and purchasers reported that prices either steadily increased or fluctuated to end higher, that demand fluctuated, and that raw material costs either increased or did not change.

Table II-1
CDMT: Count of firms' responses regarding the impact on the U.S. market of the 301 tariffs on Chinese origin products

Number of firms reporting

Impact on	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
Domestic supply	Producer	0	0	1	0	0
China supply	Producer	0	0	1	0	0
Other than China supply	Producer	0	0	1	0	0
Prices of CDMT	Producer	0	0	1	0	0
Overall demand	Producer	0	0	1	0	0
Raw material costs	Producer	0	0	1	0	0
Domestic supply	Importer	1	1	1	1	0
China supply	Importer	0	0	0	0	4
Other than China supply	Importer	1	1	2	0	0
Prices of CDMT	Importer	2	1	0	1	0
Overall demand	Importer	0	2	1	1	0
Raw material costs	Importer	2	0	1	0	0
Domestic supply	Purchaser	1	2	2	0	0
China supply	Purchaser	0	0	1	1	3
Other than China supply	Purchaser	0	3	0	1	1
Prices of CDMT	Purchaser	3	3	0	0	0
Overall demand	Purchaser	2	0	2	1	0
Raw material costs	Purchaser	1	1	3	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers, importers, and purchasers were also asked to report the impact of section 232 measures on overall demand, supply, prices, and raw material costs (table II-2). Most firms (5 of 6 U.S. producers, 11 of 24 importers, and 11 of 23 purchasers) reported that the section 232 measures had an impact on the CDMT market. Most firms reported that imported supply of CDMT decreased, demand fluctuated, and prices and raw material costs increased. Responses differed for domestic supply: most U.S. producers reported no change, while importer and purchaser responses were mixed.

Table II-2**CDMT: Count of firms' responses regarding the impact on the U.S. market of the 232 tariffs on steel and aluminum imports**

Number of firms reporting

Impact on	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
Domestic supply	Producer	0	1	4	0	0
Imported supply	Producer	0	0	1	3	1
Prices of CDMT	Producer	0	5	0	0	0
Overall demand	Producer	0	2	2	1	0
Raw material costs	Producer	0	5	0	0	0
Domestic supply	Importer	2	3	3	2	0
Imported supply	Importer	0	1	2	3	4
Prices of CDMT	Importer	5	4	1	0	0
Overall demand	Importer	1	3	5	1	0
Raw material costs	Importer	2	3	2	0	0
Domestic supply	Purchaser	2	1	5	1	1
Imported supply	Purchaser	0	1	2	3	4
Prices of CDMT	Purchaser	5	5	1	0	0
Overall demand	Purchaser	3	1	3	0	2
Raw material costs	Purchaser	3	3	4	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Half of responding foreign producers reported that the section 232 measures had an impact on their exports of CDMT to the United States. Foreign producer *** reported that the Bureau of Industry and Security (BIS) introduced an 11,280-ton tariff rate quota (“TRQ”) on Italian mechanical tubing effective January 1, 2022, which allows for the importation of 2,820 metric tons per quarter of mechanical tubing (a product family which contains a much broader coverage than the scope of the AD order, including both hot-finished and cold-drawn material and multiple sizes). It stated that CBP weekly reports indicate that the quota portion of the mechanical tubing TRQ is highly competitive and thus, there is a significant risk that Italian CDMT exporters will be subject to the 25-percent tariff portion of this TRQ. It added that, given that there are several other sources potentially free from the payment of this tariff (i.e., other European countries with large/unfulfilled quota, the UK, Japan, South Korea, Brazil, Argentina, Ukraine or Australia), the U.S. market is less attractive to Italian CDMT producers. Foreign producers *** reported that most of their CDMT for the U.S. market has been excluded from the section 232 measures, that they export “qualitative high precision” CDMT tubes, and U.S. sources for these types of products are limited. Foreign producers *** reported that they experienced

significant impacts from the section 232 measures including “restricted” orders by customers and additional duty burden.

Channels of distribution

U.S. producers sold mainly to distributors during the review period while importers sold mainly to end users, as shown in table II-3. South Korea was the only subject country that sold primarily to distributors throughout the period and the share of CDMT imported from China sold to distributors increased to be the majority starting in 2021.

Table II-3
CDMT: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2017	2018	2019	2020
United States	Distributor	***	***	***	***
United States	End user	***	***	***	***
China	Distributor	***	***	***	***
China	End user	***	***	***	***
Germany	Distributor	***	***	***	***
Germany	End user	***	***	***	***
India	Distributor	***	***	***	***
India	End user	***	***	***	***
Italy	Distributor	***	***	***	***
Italy	End user	***	***	***	***
South Korea	Distributor	***	***	***	***
South Korea	End user	***	***	***	***
Switzerland	Distributor	***	***	***	***
Switzerland	End user	***	***	***	***
Subject sources	Distributor	***	***	***	***
Subject sources	End user	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***
Nonsubject sources	End user	***	***	***	***
All import sources	Distributor	***	***	***	***
All import sources	End user	***	***	***	***

Table continued.

Table II-3 Continued
CDMT: Share of U.S. shipments by source, channel of distribution, and period

Shares in percent

Source	Channel	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Distributor	***	***	***	***
United States	End user	***	***	***	***
China	Distributor	***	***	***	***
China	End user	***	***	***	***
Germany	Distributor	***	***	***	***
Germany	End user	***	***	***	***
India	Distributor	***	***	***	***
India	End user	***	***	***	***
Italy	Distributor	***	***	***	***
Italy	End user	***	***	***	***
South Korea	Distributor	***	***	***	***
South Korea	End user	***	***	***	***
Switzerland	Distributor	***	***	***	***
Switzerland	End user	***	***	***	***
Subject sources	Distributor	***	***	***	***
Subject sources	End user	***	***	***	***
Nonsubject sources	Distributor	***	***	***	***
Nonsubject sources	End user	***	***	***	***
All import sources	Distributor	***	***	***	***
All import sources	End user	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Geographic distribution

U.S. producers reported selling CDMT to all regions in the contiguous United States (table II-4). Importers reported selling primarily to the Midwest and Southeast, with fewer firms selling to the Northeast, Central Southwest, Pacific Coast, and Mountain regions. For U.S. producers, 14.2 percent of sales were within 100 miles of their production facility, 71.9 percent were between 101 and 1,000 miles, and 13.9 percent were over 1,000 miles. Importers sold 20.6 percent within 100 miles of their U.S. point of shipment, 67.7 percent between 101 and 1,000 miles, and 11.7 percent over 1,000 miles.

Table II-4
CDMT: Count of U.S. producers' and U.S. importers' geographic markets

Number of firms reporting

Region	U.S. producers	China	Germany	India	Italy	South Korea	Switzerland	Subject sources
Northeast	6	5	1	3	1	1	1	6
Midwest	6	8	1	5	3	1	1	14
Southeast	6	5	1	2	2	2	1	8
Central Southwest	5	3	1	1	2	1	1	5
Mountains	5	3	1	1	1	1	1	4
Pacific Coast	5	2	1	2	1	2	1	5
Other	0	0	0	0	0	0	0	0
All regions (except Other)	5	2	1	0	1	1	1	3
Reporting firms	6	9	1	7	3	2	1	16

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other U.S. markets include AK, HI, PR, and VI.

Supply and demand considerations

U.S. supply

Table II-5 provides a summary of the supply factors regarding CDMT from U.S. producers and from subject countries. Reported capacity in Germany, India, and Italy were all much higher than capacity in South Korea and Switzerland in 2017 and 2022.

Table II-5
CDMT: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	United States	China	Germany	India
Capacity 2017	Quantity	575,200	***	***	***
Capacity 2022	Quantity	535,029	***	***	***
Capacity utilization 2017	Ratio	81.3	***	***	***
Capacity utilization 2022	Ratio	83.5	***	***	***
Inventories to total shipments 2017	Ratio	6.5	***	***	***
Inventories to total shipments 2022	Ratio	6.5	***	***	***
Home market shipments 2022	Share	85.4	***	***	***
Non-US export market shipments 2022	Share	14.6	***	***	***
Ability to shift production (firms reporting “yes”)	Count	5 of 6	***	***	***

Table continued.

Table II-5 Continued
CDMT: Supply factors that affect the ability to increase shipments to the U.S. market, by country

Quantity in short tons; ratio and share in percent

Factor	Measure	Italy	South Korea	Switzerland	Subject suppliers
Capacity 2017	Quantity	***	***	***	***
Capacity 2022	Quantity	***	***	***	***
Capacity utilization 2017	Ratio	***	***	***	***
Capacity utilization 2022	Ratio	***	***	***	***
Inventories to total shipments 2017	Ratio	***	***	***	***
Inventories to total shipments 2022	Ratio	***	***	***	***
Home market shipments 2022	Share	***	***	***	***
Non-US export market shipments 2022	Share	***	***	***	***
Ability to shift production (firms reporting “yes”)	Count	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Responding U.S. producers accounted for the vast majority of U.S. production of CDMT in 2022. Responding foreign producer/exporter firms accounted for the majority of U.S. imports of CDMT from Germany and Italy, less than half from India, less than *** percent from South Korea, and *** from Switzerland during 2022. No Chinese foreign producers responded to the Commission’s questionnaire. For additional data on the number of responding firms and their share of U.S. production and of U.S. imports from each subject country, please refer to Part I, “Summary Data and Data Sources.”

Domestic production

Based on available information, U.S. producers of CDMT have the ability to respond to changes in demand with moderate changes in the quantity of shipments of U.S.-produced CDMT to the U.S. market. The main contributing factors to this degree of responsiveness of supply are some unused capacity, some ability to shift shipments from alternate markets, and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited availability of inventories.

U.S. production capacity and production decreased irregularly, though production decreased at a slower rate during 2017-22, leading to a small increase in capacity utilization. Inventories were steady and under 7 percent of total shipments between 2017 to 2022. Major export markets include Australia, Canada, Mexico, and the United Kingdom. None of the U.S. producers reported barriers to exporting. Five of six U.S. producers reported they can switch product to other products using the same equipment that is used to produce CDMT. Other products that producers reportedly can produce on the same equipment as CDMT are other mechanical tubing products, carbon and alloy pipe and boiler tubing, “sch 40 and sch 80 pickle and oil standard pipe,” cold-drawn pressure tubing, and non-cold-drawn long tubes or cut tubes. Factors affecting U.S. producers’ ability to shift production include time, cost, price, cleaning, available market volume would reduce ability to shift to other products, reduced overall capacity and reduced margins, modification for input materials, and customer demand. U.S. producers encountered supply constraints during 2017-22, as discussed below.

Subject imports from China

No foreign producers from China responded to the Commission’s questionnaire. Based on the very limited available information, producers of CDMT from China may have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of CDMT to the U.S. market. As shown in Part IV, imports of CDMT from China to the U.S. declined during 2017-22, while global exports were stable from 2017-21 and increased in 2022.

Subject imports from Germany

Based on available information, producers of CDMT from Germany have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of CDMT to the U.S. market. The main contributing factors to this degree of responsiveness of supply are some unused capacity, the ability to shift shipments from alternate markets, and ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include limited availability of inventories.

German producers' capacity and production decreased during 2017-22, leading to a decline in capacity utilization. German producer *** reported that there are nine active welded and seamless drawing tube mills, which have a total capacity of more than 500 kilotons per year. German producer *** reported that there is strong home market competition due to several strong competitors. Inventories remained *** during the period of review. Major export markets include Australia, China, Czechia, France, Ireland, Italy, Japan, Poland, Romania, South Korea, Sweden, and Turkey. Other products that responding foreign producers reportedly can produce on the same equipment as CDMT are other welded products and "tubes for automotive, energy, and industrial applications". Factors affecting the ability to shift production include technical backup solutions that allow for changes in production, if required, and market demand.

Subject imports from India

Based on available information, producers of CDMT from India have the ability to respond to changes in demand with moderate changes in the quantity of shipments of CDMT to the U.S. market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating responsiveness of supply include limited availability of inventories, limited ability to shift shipments from alternate markets, and limited ability to shift production to or from alternate products.

Indian producers increased production at a faster rate than they increased capacity, leading to an increase in capacity utilization. Indian producer *** reported that the demand in India for CDMT is 210,000 metric tons per year and there are more than ten tube manufacturers in India, so the degree of competition is moderate. Major export markets reported by Indian producers include Bulgaria, China, Czechia, Germany, Indonesia, Italy, Malaysia, Poland, Spain, Thailand, and Vietnam. One of three Indian producers (***) reported being able to switch production using the same equipment as CDMT and reported other products that can be produced on the same equipment as CDMT are: cold-drawn seamless heat exchanger, boiler tubes, and line pipes. Factors affecting the ability to shift production include increased costs.

Subject imports from Italy

Based on available information, producers of CDMT from Italy have the ability to respond to changes in demand with small-to-moderate changes in the quantity of shipments of CDMT to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of inventories, ability to shift shipments from alternate markets, and

ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include relatively small amount of unused capacity.

Italian production of CDMT outpaced increased capacity, leading to an increase in capacity utilization during 2017-22. Italian producer *** reported that there are around 15 producers in the European Union that are active in the common market. Inventories also increased during the period of review. Major export markets include China, France, Germany, India, and Turkey. *** reported that other products that it can produce on the same equipment as CDMT are ***. Factors affecting the ability to shift production include time, price, urgency, furnace capacity, labor cost, and order backlog.

Subject imports from South Korea

Based on available information, the sole responding producer of CDMT from South Korea, SIC, has the ability to respond to changes in demand with *** changes in the quantity of shipments of CDMT to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and ability to shift shipments from alternate markets. Factors mitigating responsiveness of supply include limited inventories, and limited ability to shift production to or from alternate products.

Capacity was stable while production increased, leading to an increase in capacity utilization during 2017-22; however, SIC's capacity utilization rate in 2022 was ***. SIC reported ***. SIC reported that it ***.

Subject imports from Switzerland

Based on available information, producers of CDMT from Switzerland have the ability to respond to changes in demand with moderate changes in the quantity of shipments of CDMT to the U.S. market. The main contributing factors to this degree of responsiveness of supply are some unused capacity, the ability to shift shipments from third country markets, and the ability to shift production to or from alternate products. Factors mitigating responsiveness of supply include decreased overall capacity over the review period and limited inventories.

Swiss producers' capacity and production decreased, leading to a decline in capacity utilization during 2017-22. Inventories and exports to third country markets were low in 2022; ***. Other products that responding foreign producers

reportedly can produce on the same equipment as CDMT are “tubes for automotive, energy, and industrial end uses.” Factors affecting the ability to shift production include market demand for automotive applications. *** reported that it could also produce welded cold drawn energy tubes, but that there is no demand for this product.

Imports from nonsubject sources

Nonsubject imports accounted for a fluctuating share of total imports during 2017-22 and were *** percent of total U.S. imports by quantity in 2022 (see table IV-1). The largest sources of nonsubject imports during 2017-22 were Canada, Japan, Mexico, and Spain. Combined, these countries accounted for 66.2 percent of nonsubject imports in 2022 (see table IV-2).

Supply constraints

Four of six U.S. producers and 8 of 21 importers reported that they had experienced supply constraints since January 1, 2017. U.S. producer *** reported that, similar to what many other industries encountered in late 2021 and early 2022, labor and supply chain tightness temporarily extended lead times for raw materials but that its CDMT manufacturing lead-time remained within the typical industry window. It stated that these issues were temporary and were resolved by mid-2022. U.S. producer *** reported that a mechanical breakdown of its piercing mill in June 2021 backed up production into the fourth quarter. U.S. producer *** reported that on occasion in 2022 and 2023, some orders were declined due to simultaneous orders coupled with inaccurate customer forecasts. U.S. producer *** reported that during the second half of 2021, certain customers were on controlled order entry primarily due to weather-related issues affecting hot-rolled coil supplies. Two importers referenced the antidumping and countervailing duty orders as a supply constraint and two cited the COVID-19 pandemic and related supply chain disruptions. Importer *** reported long lead times from domestic and import sources.³

Thirteen of 22 responding purchasers reported that they had been unable to obtain the CDMT supply they needed, particularly from domestic mills. Purchasers *** cited being put on allocation or controlled order entry, or both. Purchaser *** reported that U.S. mills’ on-time delivery performance has been “terrible” and that they stopped taking orders, and that distributors do

³ See also Domestic interested parties’ discussion of supply constraints. Domestic interested parties’ prehearing brief, pp. 59-60.

not have product available. Purchaser *** reported that PTC Alliance has refused requests to quote on cold-drawn tube. Purchaser *** reported that ArcelorMittal had a labor and capacity shortage at its Marion, Ohio facility in the first quarter of 2021 and that PTC Alliance had occasional labor issues in 2022. Purchaser *** cited capacity constraints from Webco until the end of 2024 and also cited supply constraints from other domestic producers based on grade or lead-time constraints. Purchaser *** reported that it temporarily sourced some CDMT from Italy due to unavailability from its regular, primarily domestic, suppliers. Purchaser *** reported that domestic deliveries have been an issue since December 2019, with deliveries as much as six months late. Purchaser *** reported that since March 2021 to the present, it has experienced being put on allocation, orders not accepted, shortages of deliveries, and deliveries up to eight months late. It continued that while there were not significant supply constraints from 2017 to March 2021, lead times in mid-2017 through early 2018 went from 2-3 months to 4-6 months. Purchaser *** reported that in some cases material size and/or grade were not available domestically. Purchaser *** reported that in 2020 and 2021, its main supplier was not always able to meet its demand due to mill constraints and it was also unable to procure product from other sources, who prioritized their existing customers.

Most foreign producers (11 of 15) reported that changes in factors affecting supply had not affected the availability of CDMT in the U.S. market, other export markets, or their home countries; four reported that they had. Foreign producer *** cited the U.S. AD/CVD orders for producers in South Korea and the U.S. quota on steel tubes produced in South Korea as well as domestic socialistic labor regulations such as increased minimum wage levels for other export markets. Foreign exporter *** reported that it faced significant transportation and services restrictions in 2020 due to the COVID-19 pandemic and massive increases in energy prices and associated inflation in 2022. When asked if they anticipate any changes in the availability of CDMT for export to the U.S. market in the future, eleven foreign producers reported that they do not anticipate a change and four reported that they anticipate a decrease in availability of CDMT for export to the United States, citing declining demand, limited customer commitments, capacity constraints, ongoing tariff and quota barriers, and a plant closing in 2024.

Purchasers were also asked if the availability of supply from domestic, subject, and nonsubject sources had changed since January 1, 2017, and if they anticipate changes in supply from these sources in the future. Twelve of 21 purchasers reported that the supply of domestically produced product had changed since January 1, 2017, 8 of 15 reported that the

supply of subject imports had changed, and 4 of 13 reported that the supply of nonsubject imports had changed. Most purchasers cited lead-time changes, late deliveries, higher demand, and supply disruptions during the COVID-19 pandemic as reasons for changes in availability. Purchaser *** reported that due to domestic price increases after the antidumping and countervailing duty orders were implemented in 2018, imported supply was limited, and demand for domestic steel increased significantly, which started to limit availability and increased lead times. It continued that during the pandemic, hot-rolled strip was in short supply because of high demand in the automotive industry (particularly in March 2021), which limited supply of this raw material to cold drawn producers. It added that there was not enough cold drawn tubing for the U.S. market primarily from March 2021 to July 2023, and continues to be limited for some products and sizes. It also reported that domestic mills were at full capacity and put it and others on allocation during that time.

Lastly, 7 of 20 responding purchasers reported that certain grades, types, or sizes of CDMT are only available from certain country sources. Some purchasers reported that some particular grades of steel are available only from a small group of suppliers and certain CDMT sizes/grades are only available from Italy but did not elaborate on the particular sizes/grades. Purchaser *** reported that U.S. producers will not meet its customers' requirements for certain sizes and grades. Purchaser *** reported that certain grades (34MnB5 and 25CrMo4) are only available in Europe. Purchaser *** reported that hydraulic cylinder groups in the quality and quantity it needs for *** are currently only available from Italy. Purchaser *** cited ST52 grade as not reasonably available in the United States.^{4 5}

⁴ Specifically, this purchaser *** reported that "1026 grade is the common grade used in the U.S. for cold drawn seamless. St52, which is a superior (safer) grade than 1026 for many reasons, is available in the U.S., but not reasonably available due to the 150-300 minimum order quantity ("MOQ"). In Thailand/China/Europe, st52 equivalent grade is common, readily available, with ~5ton MOQs per size. No U.S. mill can make 12.250" and above in DOM. It is forced to pay ADD/CVD rates on DOM material from 12.250 -13.031" (331mm), from China, when no U.S. mill can make it. There has been zero development by any U.S. mill to invest in this capability. 10" OD CDS and above is not readily available or not capable of being produced in the U.S. It is readily available in Thailand and China. U.S. is limited on CDS OD X wall ratio (thicker walls) for larger diameter tubing. US is limited on Length (Above 24' for larger diameter CDS). These have never been made in the U.S. and no plans to make them."

⁵ Domestic interested parties also argue that the use of the term "specialty" is a misnomer because CDMT products are primarily made-to-order to customer specification. Domestic interested parties allege that they can produce seamless CDMT for hydraulic cylinder applications in the U.S. market, that ArcelorMittal can produce grades ST52, 34MnB5, and 25CRMo4, or equivalent; PTC alliance can produce 34MnB5; and ***. They allege that the only product category the domestic industry cannot produce is CDMT with an outside diameter great than 12.5 inches and up to 13.031 inches. Domestic interested parties' posthearing brief, pp. 2-5, Exhibits 4 and 5.

New suppliers

Four of 23 purchasers indicated that new suppliers entered the U.S. market since January 1, 2017, and two expect additional entrants. Purchasers cited Metalfer-Brazil, Pennar, Prolamsa, Prosankin, Shuan HWA, Steel Tube Investment, TSP Precision Steel Tube, and Yichang Zhongnan as new entrants in the U.S. market.

U.S. demand

Based on available information, the overall demand for CDMT is likely to experience small-to-moderate changes in response to changes in price. The main contributing factors are the limited substitute products and the generally small cost share of CDMT in most of its end-use products.

End uses and cost share

U.S. demand for CDMT depends on the demand for U.S.-produced downstream products. Reported end uses in the original investigation covered many applications, including those in the automotive, agriculture, construction, energy, mining, and fluid power sectors. CDMT is further processed downstream (i.e., cut to length, cleaned, etc.) and fit for its particular end-use application.⁶ The vast majority of firms in these reviews reported that there has not been a change in the end uses for CDMT since 2017. Purchaser *** reported that due to limited supply and restricted capabilities from cold-drawn suppliers, it sees more customers accepting hot-finish tubes which drives lower demand for cold-drawn tube.

CDMT accounts for a moderate share of the cost of the direct downstream products in which it is used, but accounts for a much smaller share of the cost of final end-use products.⁷ Reported cost shares for some end uses in the original investigations were as follows (listed in order of cost share):

- Airbag inflator (15-80 percent)
- Hydraulic cylinders (10-88 percent)
- Commercial vehicle axles (60 percent)
- Automotive antivibration components (25-60 percent)
- Seatbelt pretensioner (40 percent)
- Tools (40 percent)

⁶ Original publication, p. II-8.

⁷ Original publication, p. II-8.

- High pressure parts, including nitrogen gas springs (11-30 percent)
- Drive shafts (14-20 percent)
- Water pump bearings (9 percent)
- Forklifts (5 percent)
- Poultry egg systems (2-3 percent)
- Hydraulic fracking pump (1.5 percent)
- 747 Airliner (0.1 percent)⁸

Business cycles

Two of six U.S. producers, 10 of 20 responding importers, and 13 of 21 purchasers indicated that the market was subject to business cycles. Specifically, firms cited seasonality and the direct impact of the end-use markets on demand in the CDMT market. U.S. producer *** reported that CDMT is utilized in a broad assortment of applications but demand generally moves in parallel with the overall economy. U.S. producer *** reported that the service center/distributor market is the primary market that experiences a business cycle during the year and that fluctuations tend to be driven by fluctuations in hot-rolled coil prices. It continued that oil and gas and mining markets see fluctuations across years driven largely by commodity pricing. Importer *** reported that November and December are the slowest times of the year and March through June tends to be the period of highest demand for CDMT. It continued that since CDMT is used in many industries, the market does not have a clear business cycle trend outside of general economic trends.

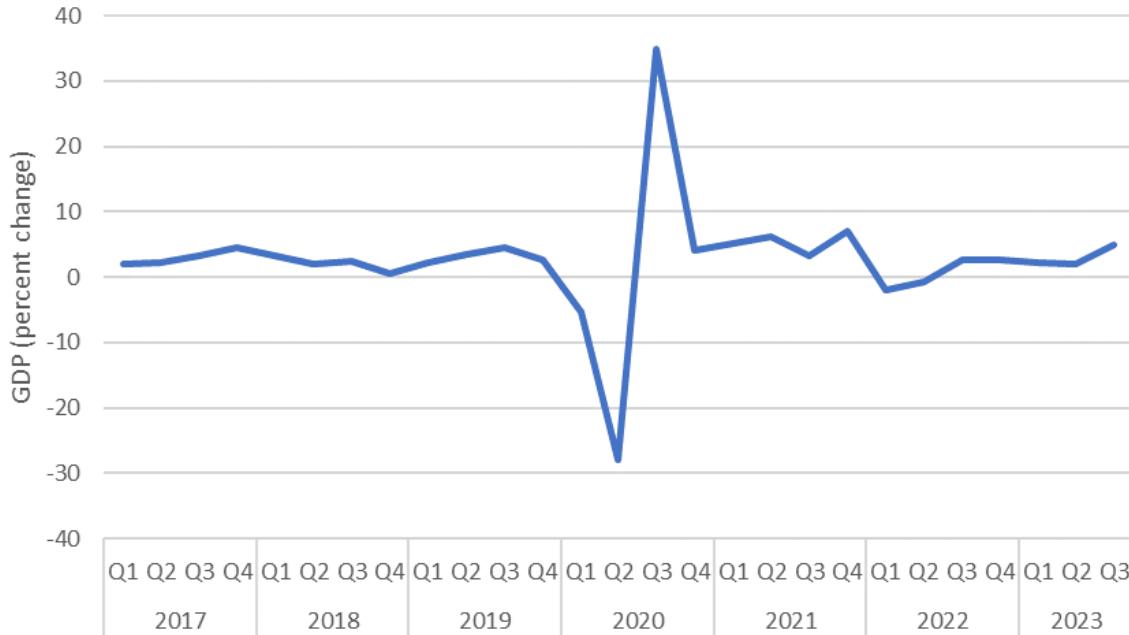
Demand trends

Demand for CDMT is driven by overall economic growth, and demand in downstream sectors including the agriculture, oil and gas, and automotive sectors.⁹ Overall GDP growth fluctuated during the period of review, with major fluctuations in 2020 and a decline in early 2022 (figure II-1 and table II-6). Expenditures on agricultural vehicles and machinery increased overall from 2017-2023 (figure II-2 and table II-7). Oil and gas rigs in operation dropped substantially during the first half of 2020, recovering to January 2017 levels by September 2023 (figure II-3 and table II-8). Domestic auto production declined substantially in 2020 and was 52 percent lower in 2023 than in 2017 (figure II-4 and table II-9).

⁸ Original publication, p. II-8.

⁹ Original publication, p. II-10.

Figure II-1
Real U.S. GDP growth: Percentage change from the previous quarter, seasonally adjusted, January 2017-September 2023



Source: National Income and Product Accounts-Table 1.1.1, Percent Change from Preceding Period in Real Gross Domestic Product, Bureau of Economic Analysis, http://www.bea.gov/iTable/index_nipa.cfm, retrieved November 28, 2023.

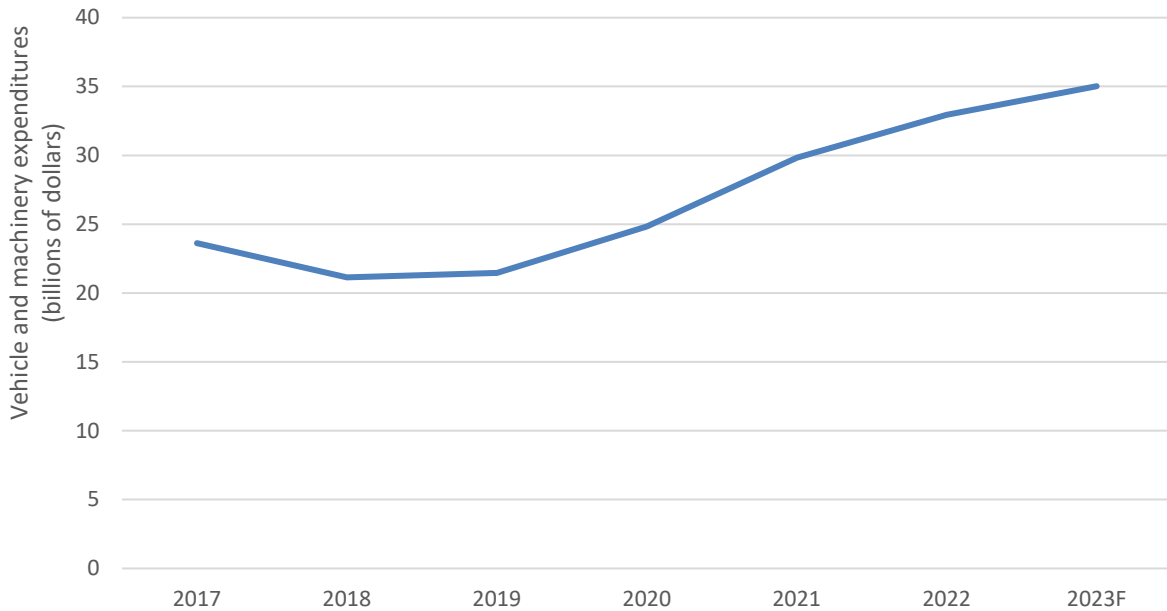
Table II-6
Real U.S. GDP growth: Percentage change from the previous quarter, seasonally adjusted, January 2017-September 2023

GDP as a percent change

Month	2017	2018	2019	2020	2021	2022	2023
Q1	2.0	3.3	2.2	(5.3)	5.2	(2.0)	2.2
Q2	2.3	2.1	3.4	(28.0)	6.2	(0.6)	2.1
Q3	3.2	2.5	4.6	34.8	3.3	2.7	4.9
Q4	4.6	0.6	2.6	4.2	7.0	2.6	---

Source: National Income and Product Accounts-Table 1.1.1, Percent Change from Preceding Period in Real Gross Domestic Product, Bureau of Economic Analysis, http://www.bea.gov/iTable/index_nipa.cfm, retrieved November 28, 2023.

Figure II-2
Agricultural vehicles and machinery: Annual gross capital expenditures, current dollars, 2017-23



Source: U.S. Department of Agriculture, Farm Income and Wealth Statistics, “Gross Capital Expenditures,” <https://data.ers.usda.gov/reports.aspx?ID=17836>, accessed September 28, 2023. Data for 2023 are forecast.

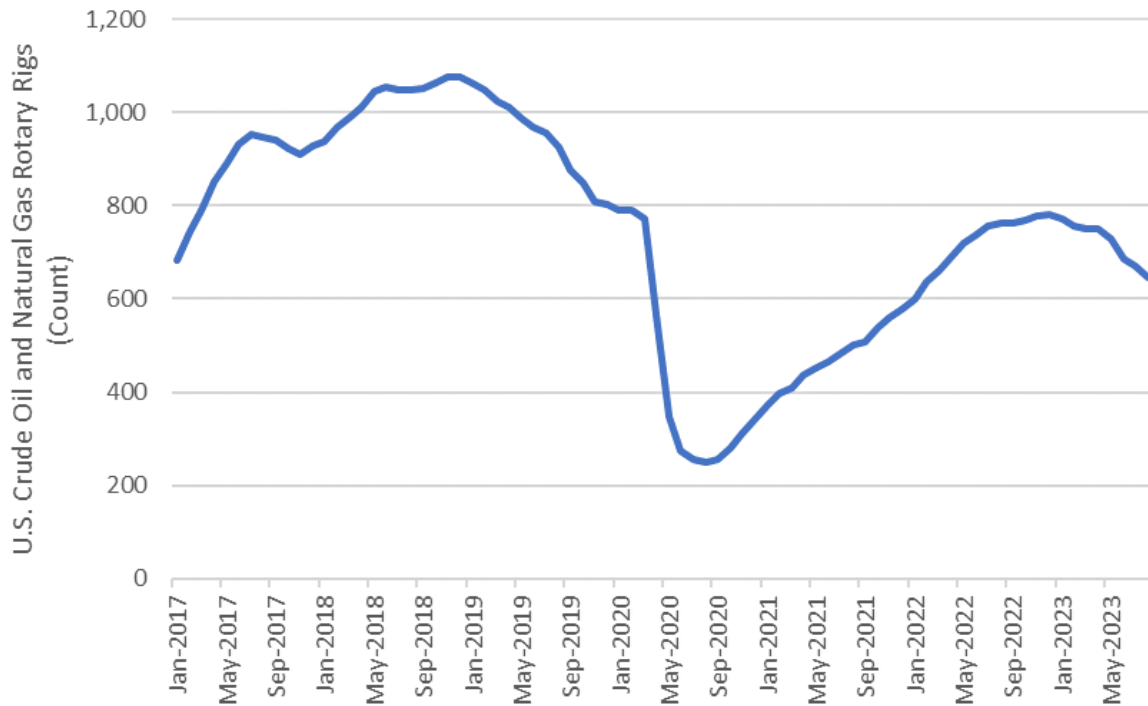
Table II-7
Agricultural vehicles and machinery: Annual gross capital expenditures, current dollars, 2017-23

In thousand dollars

Period	Vehicles and machinery expenditures
2017	23,632,951
2018	21,138,815
2019	21,459,137
2020	24,832,231
2021	29,838,494
2022	32,943,075
2023 (Forecast)	35,021,417

Source: U.S. Department of Agriculture, Farm Income and Wealth Statistics, “Gross Capital Expenditures,” <https://data.ers.usda.gov/reports.aspx?ID=17836>, accessed September 28, 2023. Data for 2023 are forecast.

Figure II-3
Oil and gas: U.S. crude oil and natural gas rotary rigs in operation, by month, January 2017-August 2023



Source: Energy Information Administration, U.S. Crude Oil and Natural Gas Rotary Rigs in Operation (Count), https://www.eia.gov/dnav/ng/hist/e_ertr0_xr0_nus_cm.htm, accessed September 28, 2023.

Table II-8
Oil and gas: Count of U.S. crude oil and natural gas rotary rigs in operation, by month, January 2017-August 2023

Rigs in count

Month	2017	2018	2019	2020	2021	2022	2023
January	683	937	1065	791	374	601	772
February	744	969	1048	790	397	636	758
March	789	989	1023	771	408	662	752
April	853	1,011	1013	565	436	690	752
May	893	1,046	986	348	453	719	728
June	931	1,056	970	274	464	738	687
July	953	1,050	955	255	483	757	672
August	947	1,050	926	250	501	764	647
September	940	1,053	878	257	508	762	---
October	922	1,063	848	280	538	768	---
November	911	1,077	810	311	560	779	---
December	930	1,077	804	341	579	780	---

Source: Energy Information Administration, U.S. Crude Oil and Natural Gas Rotary Rigs in Operation (Count), https://www.eia.gov/dnav/ng/hist/e_ertr0_xr0_nus_cm.htm, accessed September 28, 2023.

Figure II-4
U.S. auto production, seasonally adjusted, by month, January 2017-October 2023



Source: U.S. Bureau of Economic Analysis, Domestic Auto Production ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/DAUPSA>, December 4, 2023.

Table II-9
U.S. auto production, seasonally adjusted, monthly, January 2017-October 2023

Thousands of units

Month	2017	2018	2019	2020	2021	2022	2023
January	279.3	217.8	232.5	217.3	180.9	131.4	141.9
February	278.1	246.3	219.5	222.2	145.0	128.8	147.5
March	264.1	259.3	210.0	143.3	125.8	136.6	152.8
April	287.9	249.4	205.0	1.7	133.2	142.1	152.1
May	283.7	233.1	213.7	48.2	129.9	139.5	145.8
June	257.2	226.1	212.1	141.3	123.8	143.2	143.6
July	212.1	195.0	205.1	209.3	135.7	140.7	148.9
August	252.9	212.2	212.4	193.8	121.2	154.0	160.1
September	225.1	226.9	198.5	190.6	84.1	152.3	152.8
October	225.8	232.9	180.7	182.2	124.2	149.0	134.4
November	222.1	233.0	212.1	180.2	132.7	141.0	---
December	219.9	253.0	206.0	172.5	140.2	135.0	---

Source: U.S. Bureau of Economic Analysis, Domestic Auto Production ***, retrieved from FRED, Federal Reserve Bank of St. Louis; <https://fred.stlouisfed.org/series/DAUPSA>, December 4, 2023.

U.S. producers, importers, purchasers, and foreign producers were asked about overall demand trends in the CDMT market since January 1, 2017, as well as demand in four sectors: agricultural, automotive, industrial, and oil and gas (tables II-10 and II-11). Firms' responses were mixed. Most U.S. producers reported that overall U.S. demand fluctuated up (4 of 6). As many importers that reported overall U.S. demand fluctuated up (3 of 8) reported that U.S. demand had fluctuated down or steadily decreased (3). A plurality of purchasers reported that U.S. demand had fluctuated up (6 of 13) and four reported that U.S. demand had fluctuated down or steadily decreased. Four foreign producers each reported that U.S. demand had fluctuated up, fluctuated down, and had not changed since January 1, 2017. These firms cited a high level of volatility in 2020-22 due to the COVID-19 pandemic and 2021 supply chain crisis, but that present-day market conditions are similar if not better than January 2017 due to overall production increases and expansion of infrastructure projects.

Most firms also reported that U.S. demand in each of the four sectors also fluctuated up or did not change, with the exception of the automotive sector, for which most importers reported decreased demand.

With respect to the agricultural sector, U.S. producer *** reported that crop prices and farm incomes have been "steading better," encouraging more spending on equipment. With respect to the automotive sector, U.S. producer *** reported that automakers have not yet returned to pre-COVID production levels due to supply constraints and tight labor market. U.S. producer *** reported that light vehicle sales have declined since the pandemic and U.S. producer *** reported that OEM production has decreased. Importer *** reported that demand fluctuated down because of the disruption caused by tariffs, as well as the COVID-19 pandemic and its associated effects. With respect to the industrial sector, firms stated that infrastructure spending has increased demand, production has steadily increased, and this sector has shown strong and consistent demand except for 2020. With respect to the oil and gas sector, U.S. producer *** reported that land-based drilling and completion in the oil and gas sector has fluctuated and has been trending down while importer *** reported that there has been strong and consistent demand in the oil and gas sector, except for 2020.

Table II-10
CDMT: Count of firms' responses regarding overall domestic and foreign demand since January 1, 2017, by firm type

Number of firms reporting

Market	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
U.S. demand	U.S. producers	0	4	1	1	0
U.S. demand	Importers	0	3	2	2	1
U.S. demand	Purchasers	3	6	3	1	3
U.S. demand	Foreign producers	1	4	4	4	1
Foreign demand	U.S. producers	0	0	1	3	0
Foreign demand	Importers	0	2	1	2	0
Foreign demand	Purchasers	0	1	2	0	2
Demand in subject home market	Foreign producers	1	4	4	3	2
Demand in other export markets	Foreign producers	1	5	5	2	1
Demand for end use products	Purchasers	1	7	2	1	3

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-11
CDMT: Count of firms' responses regarding domestic demand since January 1, 2017, by sector and firm type

Number of firms reporting

Sector	Firm type	Steadily increase	Fluctuated up	No change	Fluctuated down	Steadily decreased
Agricultural	U.S. producers	1	2	1	1	0
Agricultural	Importers	1	1	2	1	0
Agricultural	Purchasers	1	4	2	0	1
Automotive	U.S. producers	0	1	1	2	1
Automotive	Importers	1	2	1	4	2
Automotive	Purchasers	1	3	3	1	1
Industrial	U.S. producers	1	2	1	0	1
Industrial	Importers	1	2	3	1	0
Industrial	Purchasers	3	3	3	0	1
Oil and gas	U.S. producers	0	2	1	2	0
Oil and gas	Importers	0	3	3	0	0
Oil and gas	Purchasers	0	2	2	0	4

Source: Compiled from data submitted in response to Commission questionnaires.

Firms were also asked about anticipated demand trends in the overall CDMT market and in the four sectors. Firms generally expect U.S. demand to either fluctuate up or not change over the next two years across sectors (tables II-12 and II-13).^{10 11}

Table II-12
CDMT: Count of firms’ responses regarding anticipated overall domestic and foreign demand, by firm type

Number of firms reporting

Market	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
U.S. demand	U.S. producers	0	2	2	2	0
U.S. demand	Importers	1	0	4	1	2
U.S. demand	Purchasers	2	5	5	2	3
U.S. demand	Foreign producers	1	0	9	0	2
Foreign demand	U.S. producers	0	1	2	1	0
Foreign demand	Importers	0	1	3	0	1
Foreign demand	Purchasers	0	0	4	0	1
Demand in subject home market	Foreign producers	2	1	8	0	2
Demand in other export markets	Foreign producers	0	2	9	0	2

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁰ Domestic interested parties contend that demand is expected to soften slightly going into 2024 and remain below pre-order and pre-COVID levels. Domestic interested parties’ prehearing brief, p. 91.

¹¹ Italian respondents contend that forecasts for ***. Italian respondent parties’ prehearing brief, pp. 24-25, 35-36 and exhibits 3 and 4; posthearing brief at exhibit 1, pp. 2-6, and exhibit 4. Domestic interested parties argue that the claims that the European market is growing in demand for CDMT are “unfounded” and that the ***. They present a report by EUROFER, the European steel association, that indicates a contraction in output in 2024. Domestic Interested Parties posthearing brief, exhibit 1, pp. 5-7, and exhibit 6.

Table II-13
CDMT: Count of firms' responses regarding anticipated domestic demand, by sector and firm type

Number of firms reporting

Sector	Firm type	Steadily increase	Fluctuate up	No change	Fluctuate down	Steadily decrease
Agricultural	U.S. producers	0	2	1	2	0
Agricultural	Importers	0	0	3	1	1
Agricultural	Purchasers	1	1	3	2	1
Automotive	U.S. producers	1	2	1	0	1
Automotive	Importers	0	1	4	2	2
Automotive	Purchasers	1	3	3	1	1
Industrial	U.S. producers	1	1	1	1	1
Industrial	Importers	0	0	6	1	1
Industrial	Purchasers	2	1	4	2	1
Oil and gas	U.S. producers	0	2	2	1	0
Oil and gas	Importers	0	0	4	1	1
Oil and gas	Purchasers	1	1	1	2	3

Source: Compiled from data submitted in response to Commission questionnaires.

Substitute products

Substitutes for CDMT are limited. In the original investigations, all U.S. producers and most importers (32 of 40) and purchasers (23 of 29) reported that there were no substitutes. Eight importers and six purchasers reported substitutes for CDMT including wrapped tubes and cold-headed products for bushings and automotive components; deep drawn stamping for outer cans; and hot finished seamless tubes, ERW pipe, and bar for mechanical applications. Some of these substitutes were reported to affect the prices of CDMT.¹²

Nearly all responding firms (all 6 U.S. producers, all 24 importers, 18 of 23 purchasers, and all 15 responding foreign producers/exporters) reported that there were no changes in the substitutes since 2017 and did not anticipate any future changes in substitutes. Purchasers that reported a change in substitutes noted that hot-rolled tube has been accepted more and customers are honing the outside and inside diameter to achieve the tight tolerance of CDMT.

¹² Original publication, p. II-13.

Substitutability issues

This section assesses the degree to which U.S.-produced CDMT and imports of CDMT from subject countries can be substituted for one another by examining the importance of certain purchasing factors and the comparability of CDMT from domestic and imported sources based on those factors. Based on available data, staff believes that there is a moderately high degree of substitutability between domestically produced CDMT and CDMT imported from subject sources.¹³ Factors contributing to this level of substitutability include similar quality for CDMT across sources, similarities between domestically produced CDMT and CDMT imported from subject countries across multiple purchase factors, and interchangeability between domestic and subject sources. Factors reducing substitutability include availability issues, different lead times from domestic and subject sources, certain types of CDMT only being available only from subject sources, purchaser preferences for CDMT from domestic sources over other sources, and significant factors other than price that firms consider. Domestic interested parties stated that the domestic industry produced both standardized and customized products in seamless and welded varieties.¹⁴

Factors affecting purchasing decisions¹⁵

Purchaser decisions based on source

As shown in table II-14, most purchasers and their customers sometimes or never make purchasing decisions based on the producer or country of origin. Of the nine purchasers that reported that they always or usually make decisions based on the manufacturer, six firms cited quality as the reason. Other reasons cited include customer request, purchasing only from approved or qualified vendors, producer's capabilities, reliability, historical performance, and overall competitiveness.

¹³ The degree of substitution between domestic and imported CDMT depends upon the extent of product differentiation between the domestic and imported products and reflects how easily purchasers can switch from domestically produced CDMT to the CDMT imported from subject countries (or vice versa) when prices change. The degree of substitution may include such factors as relative prices (discounts/rebates), quality differences (e.g., grade standards, defect rates, etc.), and differences in sales conditions (e.g., lead times between order and delivery dates, reliability of supply, product services, etc.).

¹⁴ Hearing transcript, p. 8 (Luberda), p. 16 (Vore), p. 21 (Hart), p. 26 (Klenovich).

¹⁵ Twenty purchasers indicated they had marketing/pricing knowledge of domestic product, nine of Chinese product, six of Germany product, nine of Indian product, nine of Italian product, four of South Korean product, two of Swiss product, and eight of product from nonsubject countries, including Argentina, Brazil, Japan, Mexico, Romania, Spain, Taiwan, Thailand, the United Kingdom, and Vietnam.

Table II-14

CDMT: Count of purchasers' responses regarding frequency of purchasing decisions based on producer and country of origin

Number of firms reporting

Firm making decision	Decision based on	Always	Usually	Sometimes	Never
Purchaser	Producer	3	6	6	6
Customer	Producer	1	0	8	9
Purchaser	Country	1	6	9	5
Customer	Country	1	1	12	4

Source: Compiled from data submitted in response to Commission questionnaires.

Importance of purchasing domestic product

Nineteen of 21 purchasers reported that the majority of their purchases did not require purchasing U.S.-produced product. Six firms reported that domestic product was required by law (for 5 to 75 percent of their purchases), seven reported it was required by their customers (for 1 to 50 percent of their purchases), and four reported other preferences for domestic product. Reasons cited for preferring domestic product included: DFARS¹⁶ compliant required by customer (***), antidumping duties on foreign suppliers (***), and basing purchasing decisions on producer capability and overall competitiveness and performance (***)

Country preferences

Purchasers were asked if they or their customers prefer to order CDMT produced in a specific country over other possible country sources of supply. Thirteen of 23 purchasers reported that they do and 14 of 21 responding purchasers reported that their customers have such preferences. Six purchasers reported that they prefer domestic CDMT due to quality, reliability, and USMCA compliance. Two purchasers reported that they prefer to purchase CDMT imported from India because it produces small diameter tube more consistently and economically, as well as because of lead time and price. Four purchasers reported that their customers request or require domestically produced CDMT, two reported that their customers specify no Chinese material, two reported product from Italy is preferred by their customers, and one reported product from India is preferred by its customer.

¹⁶ DFARS is the Defense Federal Acquisition Regulation Supplement.

Most important purchase factors

The most often cited top three factors firms consider in their purchasing decisions for CDMT were price (23 firms), quality (20 firms), and delivery/lead times (13 firms), as shown in table II-15. Quality was the most frequently cited first-most important factor (cited by 12 firms), followed by price (7 firms); quality was the most frequently reported second-most important factor (7 firms) followed by delivery or lead times and price (6 firms each); and price was the most frequently reported third-most important factor (10 firms).

Table II-15
CDMT: Count of ranking of factors used in purchasing decisions as reported by purchasers, by factor

Number of firms reporting

Factor	First	Second	Third	Total
Price or cost	7	6	10	23
Quality	12	7	1	20
Delivery or lead times	0	6	7	13
Availability or supply	2	0	4	6
All other factors	2	4	1	NA

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Other factors include customer requirements, mill capability, acceptability, product range, accuracy of delivery quoted, ease of doing business, respect for the market, relationship, service, payment terms, testing capability, ISO/TS certification, proved experience with similar products, and historical performance for both quality of product and on-time delivery.

The majority of purchasers (15 of 23) reported that they sometimes purchase the lowest-priced product; 5 usually do; two always do; and one never purchases the lowest-priced product.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 15 factors in their purchasing decisions (table II-16). The factors rated as very important by the vast majority of responding purchasers were reliability of supply and quality meets industry standards (22 firms each), product consistency (21 firms), availability and delivery time (20 firms each), and price (19).

Table II-16
CDMT: Count of purchasers' responses regarding importance of purchase factors, by factor

Number of firms reporting

Factor	Very important	Somewhat important	Not important
Availability	20	3	0
Delivery terms	11	11	1
Delivery time	20	3	0
Discounts offered	6	10	7
Minimum quantity requirements	7	13	3
Packaging	3	16	4
Payment terms	8	11	4
Price	19	4	0
Product consistency	21	2	0
Product range	8	12	3
Quality meets industry standards	22	1	0
Quality exceeds industry standards	12	6	5
Reliability of supply	22	1	0
Technical support/service	12	8	3
U.S. transportation costs	12	10	2

Source: Compiled from data submitted in response to Commission questionnaires.

Lead times

U.S. producers reported that CDMT is primarily produced-to-order,¹⁷ with 89.4 percent of their commercial shipments were produced-to-order and lead times averaging 55 days. The remaining 10.6 percent of their commercial shipments came from inventories, with lead times averaging 10 days. Importers reported that 55.8 percent of their commercial shipments were produced-to-order, with lead times averaging 123 days. About 40 percent of their commercial shipments came from U.S. inventories, with lead times averaging 5 days and 4.2 percent of their commercial shipments came from foreign inventories, with lead times averaging 90 days.

Supplier certification

Nineteen of 23 responding purchasers require their suppliers to become certified or qualified to sell CDMT to their firm. Purchasers reported that the time to qualify a new supplier ranged from 3 to 360 days, with most reporting between 90 and 180 days. The process to qualify a supplier can include trial orders, on-site visits, surveys, third party testing, product liability, documentation and material review, ISO/TS certifications, and ability to meet specifications. Two purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify CDMT or had lost its approved status since 2017. Purchaser *** reported that Plymouth Tube has been permanently removed from its approved

¹⁷ Hearing transcript, p. 17 (Vore), p. 23 (Hart), pp. 29 and 32 (Klenovich), p. 95 (Luberda).

supplier list due to major quality issues. Purchaser *** reported that Pennar Global (India) lost approval for tubing for critical applications due to product failure.

Minimum quality specifications

As can be seen from table II-17, nearly all responding purchasers reported that domestically produced product and subject and nonsubject imported product always or usually met minimum quality specifications.

Table II-17
CDMT: Count of purchasers' responses regarding suppliers' ability to meet minimum quality specifications, by source

Number of firms reporting

Source of purchases	Always	Usually	Sometimes	Rarely or never	Don't know
United States	11	10	1	0	0
China	2	5	1	0	10
Germany	3	1	0	0	14
India	5	3	0	0	10
Italy	5	2	0	0	13
South Korea	2	1	0	0	15
Switzerland	0	2	0	0	16
Nonsubject sources	3	4	0	0	8

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Purchasers were asked how often domestically produced or imported CDMT meets minimum quality specifications for their own or their customers' uses.

Nearly all responding purchasers reported factors that determined quality. Reported factors include product consistency, third party test results, reputation in the marketplace, meets industry specifications, mechanical properties, steel quality, surface condition/finish, end finish, straightness, wall thickness, tensile strength, transition angle, chemistry and carbon equivalent, sizing tolerances, eccentricity, concentricity, rust protection, variability of production methods, ultimate stress/yield stress/elongation, workability, and no inclusions or visual defects.

Changes in purchasing patterns

Fourteen purchasers reported they had purchased CDMT from subject sources before the orders while eight reported they had not (table II-18). Most firms reported that they had not changed their subject import purchases because of the orders, two firms each reported they discontinued purchases from China and Germany and at least two firms reported reducing purchases from all subjects sources (4 reduced purchases from Germany) because of the

orders. Several firms reported changes in purchases for reasons other than the orders, including: tariffs made the supplier uncompetitive (China), lost customer that required this material (Italy), size range increased (India), required large minimums (South Korea), too low volume (Italy), quality (India), total costs and logistics (China and Italy), and purchasing decision to source domestically (Germany and Italy).¹⁸ In regards to purchases from nonsubject countries, eleven firms reported no purchases from nonsubject countries before or after the orders, five reported their purchasing pattern for nonsubject imports was essentially unchanged, two reported increasing purchases of nonsubject imports because of the orders, and four reported changes in purchase patterns from nonsubject countries for reasons other than the orders, including seamless quantity and quality was not available domestically, U.S. prices have increased, and lost customer that required this material. Purchaser *** reported that the antidumping and countervailing duty rates allowed U.S. mills to increase prices, which made prices for CDMT from nonsubject sources more competitive. *** also reported that for about an 18-month period, U.S. mills did not have drawn-over mandrel/cold-drawn seamless supply and had 10-to-12-month lead times during the COVID-related U.S. steel supply shortage. In order to fulfill customer demand, it had to purchase from nonsubject sources because the U.S. mill did not have capacity and was running 2-5 months late on deliveries.

Table II-18
CDMT: Count of purchasers' responses regarding changes in purchase patterns from subject countries after the orders

Number of firms reporting

Source of purchases	No change	Discontinued	Reduced	Other than order
China	6	2	2	3
Germany	3	2	4	2
India	7	0	2	2
Italy	6	0	2	5
South Korea	5	0	2	1
Switzerland	5	1	2	0

Source: Compiled from data submitted in response to Commission questionnaires.

Eight purchasers reported that they had changed suppliers since January 1, 2017, while 14 reported that they had not. Specifically, firms dropped or reduced purchases from China and Italy (Metalfer) because of antidumping duties, Benteler (Germany) because of DDP regulations, Metalmatic and PTC (U.S.) because of uncompetitive piece prices and “multiple

¹⁸ Purchaser *** reported other reasons as “antidumping” for China, Germany, and Italy.

private equity threats,” and Plymouth Tube because of quality issues. Firms added or increased purchases from Tube Products of India because of product need while on allocation with domestic mills, A4C-Sankin Precision Tube (Mexico) because of proximity to purchaser, Shuan HWA (Taiwan), and Drake due to focus on purchasing more domestic tubing. Firms also reported changes from cold-drawn suppliers to hot-finish suppliers.

Purchasers were also asked about changes in their purchasing patterns from different countries since January 1, 2017 (table II-19). Purchasers reported increased purchases of U.S.-produced product because of increased sales, demand, smaller size welded tubes, and foreign sources are not price competitive with antidumping and countervailing duty rates. Purchasers reported decreased purchases of U.S.-produced product because poor performance of a U.S. producer, lost customer that used the product, normal fluctuations up and down due to regular end-user market changes, end-product mix changes, lack of domestic availability, shift in demand from largest customer, less demand overall and U.S. supply constraints. Purchasers reported increased purchases of product from subject countries because of increased customer demand and dual source (China); customer request and seamless quantity and quality not available domestically (Italy); U.S. mills issued general price increases since 2017 by more than \$0.25/pound separate from indexes, making India pricing a somewhat attractive price alternative, even with the antidumping and countervailing duty rates applied; a firm was awarded more programs using small diameter tube; and size range increase (India). Purchasers reported decreased purchases of product from subject countries because of the antidumping and countervailing duty orders (China, Germany, India, Italy, South Korea); customer “in sourced” production in Mexico due to tariffs and general market conditions (Germany); lost customer that used the product and less demand overall (Italy); large minimum requirements (South Korea). Purchasers reported increased purchases of product from nonsubject countries because of select items were sent to a producer in Mexico and U.S. mill’s general price increases over the last five years makes some foreign source’s prices attractive. Purchasers reported decreased purchases of product from nonsubject countries because of lower demand overall and because they lost customers, or their customers lost the order.

Table II-19
CDMT: Count of purchasers' responses regarding changes in purchase patterns from U.S., subject, and nonsubject countries

Number of firms reporting

Source of purchases	Steadily increased	Fluctuated up	No change	Fluctuated Down	Steadily decreased	Did not purchase
United States	2	4	9	5	3	0
China	1	2	3	0	2	8
Germany	0	0	4	2	2	8
India	2	1	4	2	0	8
Italy	0	2	1	2	4	7
South Korea	0	0	3	2	0	10
Switzerland	0	0	3	0	1	11
Nonsubject sources	0	3	5	1	3	4
Sources unknown	1	0	4	0	0	8

Source: Compiled from data submitted in response to Commission questionnaires.

Purchase factor comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing CDMT produced in the United States, subject countries, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 15 factors (table II-20) for which they were asked to rate the importance.

Generally, most purchasers reported that domestically produced CDMT and CDMT imported from subject countries were comparable on most factors, except price (which the U.S. was rated inferior), and technical support/service and U.S. transportation costs (both of which the U.S. was rated superior). Sizeable numbers of purchasers rated the U.S. superior on availability, delivery time, and reliability of supply, which were all factors rated very important in table II-11.

Most purchasers reported that U.S. and nonsubject CDMT were comparable on most factors except price (for which the U.S. was rated inferior) and product range, for which purchaser responses were mixed between superior, comparable, and inferior.

Table II-20**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. China	4	3	1
Delivery terms	U.S. v. China	3	6	0
Delivery time	U.S. v. China	4	5	0
Discounts offered	U.S. v. China	0	9	0
Minimum quantity requirements	U.S. v. China	0	7	2
Packaging	U.S. v. China	0	7	2
Payment terms	U.S. v. China	1	8	0
Price	U.S. v. China	0	3	6
Product consistency	U.S. v. China	4	5	0
Product range	U.S. v. China	3	3	3
Quality meets industry standards	U.S. v. China	3	6	0
Quality exceeds industry standards	U.S. v. China	4	5	0
Reliability of supply	U.S. v. China	4	5	0
Technical support/service	U.S. v. China	6	3	0
U.S. transportation costs	U.S. v. China	6	3	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Germany	2	2	0
Delivery terms	U.S. v. Germany	1	3	0
Delivery time	U.S. v. Germany	1	3	0
Discounts offered	U.S. v. Germany	1	3	0
Minimum quantity requirements	U.S. v. Germany	2	2	0
Packaging	U.S. v. Germany	0	4	0
Payment terms	U.S. v. Germany	1	3	0
Price	U.S. v. Germany	1	2	1
Product consistency	U.S. v. Germany	0	3	1
Product range	U.S. v. Germany	0	2	2
Quality meets industry standards	U.S. v. Germany	0	3	1
Quality exceeds industry standards	U.S. v. Germany	0	3	1
Reliability of supply	U.S. v. Germany	1	2	1
Technical support/service	U.S. v. Germany	2	1	1
U.S. transportation costs	U.S. v. Germany	4	0	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. India	3	5	1
Delivery terms	U.S. v. India	3	6	0
Delivery time	U.S. v. India	4	4	1
Discounts offered	U.S. v. India	0	7	2
Minimum quantity requirements	U.S. v. India	1	5	3
Packaging	U.S. v. India	2	6	1
Payment terms	U.S. v. India	2	5	2
Price	U.S. v. India	0	1	8
Product consistency	U.S. v. India	2	6	0
Product range	U.S. v. India	4	5	0
Quality meets industry standards	U.S. v. India	2	7	0
Quality exceeds industry standards	U.S. v. India	2	7	0
Reliability of supply	U.S. v. India	4	3	2
Technical support/service	U.S. v. India	5	4	1
U.S. transportation costs	U.S. v. India	4	5	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Italy	1	2	4
Delivery terms	U.S. v. Italy	2	5	0
Delivery time	U.S. v. Italy	3	4	0
Discounts offered	U.S. v. Italy	2	5	0
Minimum quantity requirements	U.S. v. Italy	1	6	0
Packaging	U.S. v. Italy	0	5	2
Payment terms	U.S. v. Italy	2	5	0
Price	U.S. v. Italy	3	3	1
Product consistency	U.S. v. Italy	0	5	2
Product range	U.S. v. Italy	0	3	4
Quality meets industry standards	U.S. v. Italy	0	5	2
Quality exceeds industry standards	U.S. v. Italy	0	5	2
Reliability of supply	U.S. v. Italy	1	3	3
Technical support/service	U.S. v. Italy	1	4	2
U.S. transportation costs	U.S. v. Italy	4	3	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. South Korea	2	1	0
Delivery terms	U.S. v. South Korea	1	2	0
Delivery time	U.S. v. South Korea	2	0	1
Discounts offered	U.S. v. South Korea	0	3	0
Minimum quantity requirements	U.S. v. South Korea	1	2	0
Packaging	U.S. v. South Korea	0	3	0
Payment terms	U.S. v. South Korea	0	3	0
Price	U.S. v. South Korea	0	1	2
Product consistency	U.S. v. South Korea	1	1	1
Product range	U.S. v. South Korea	2	1	0
Quality meets industry standards	U.S. v. South Korea	1	2	0
Quality exceeds industry standards	U.S. v. South Korea	1	2	0
Reliability of supply	U.S. v. South Korea	1	2	0
Technical support/service	U.S. v. South Korea	3	0	0
U.S. transportation costs	U.S. v. South Korea	0	3	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Switzerland	0	0	1
Delivery terms	U.S. v. Switzerland	0	1	0
Delivery time	U.S. v. Switzerland	1	0	0
Discounts offered	U.S. v. Switzerland	0	1	0
Minimum quantity requirements	U.S. v. Switzerland	0	0	1
Packaging	U.S. v. Switzerland	0	1	1
Payment terms	U.S. v. Switzerland	0	1	0
Price	U.S. v. Switzerland	0	0	1
Product consistency	U.S. v. Switzerland	0	1	0
Product range	U.S. v. Switzerland	0	1	1
Quality meets industry standards	U.S. v. Switzerland	0	1	0
Quality exceeds industry standards	U.S. v. Switzerland	0	1	0
Reliability of supply	U.S. v. Switzerland	0	1	0
Technical support/service	U.S. v. Switzerland	0	1	0
U.S. transportation costs	U.S. v. Switzerland	1	0	0

Table continued.

Table II-20 Continued**CDMT: Count of purchasers' responses comparing U.S.-produced and imported product, by factor and country pair**

Number of firms reporting

Factor	Country pair	Superior	Comparable	Inferior
Availability	U.S. v. Nonsubject	2	5	1
Delivery terms	U.S. v. Nonsubject	1	6	1
Delivery time	U.S. v. Nonsubject	3	4	1
Discounts offered	U.S. v. Nonsubject	1	7	0
Minimum quantity requirements	U.S. v. Nonsubject	2	5	1
Packaging	U.S. v. Nonsubject	1	6	1
Payment terms	U.S. v. Nonsubject	0	8	0
Price	U.S. v. Nonsubject	1	3	4
Product consistency	U.S. v. Nonsubject	1	6	1
Product range	U.S. v. Nonsubject	3	3	2
Quality meets industry standards	U.S. v. Nonsubject	1	7	0
Quality exceeds industry standards	U.S. v. Nonsubject	1	7	0
Reliability of supply	U.S. v. Nonsubject	1	6	1
Technical support/service	U.S. v. Nonsubject	2	6	0
U.S. transportation costs	U.S. v. Nonsubject	2	6	0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

Comparison of U.S.-produced and imported CDMT

In order to determine whether U.S.-produced CDMT can generally be used in the same applications as imports from China, Germany, India, Italy, South Korea, and Switzerland, U.S. producers, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in tables II-21 to II-23, all U.S. producers and most purchasers reported that domestically produced CDMT and CDMT imported from all sources are always or frequently interchangeable. Importer responses were mixed, with most reporting that domestically produced CDMT and CDMT imported from China, India, and South Korea are always or frequently interchangeable, a majority reporting that domestically produced CDMT and CDMT imported from Germany and Italy are sometimes or never interchangeable, and one importer each reporting always, frequently, and sometimes with respect to CDMT imported from Switzerland.

Of those that reported CDMT is sometimes or never interchangeable, importer *** reported that the specific type of cold-drawn mechanical tubing it requires is not interchangeable between producers from the U.S. and Germany, Italy, and Romania because U.S. mills have not been able to provide the material or the required material certifications as indicated by its product's engineering design, the European Pressure Equipment Directive, and

by its customer standards. It continued that the CDMT required for its product designs must be sourced from producers that hold proper certification for a particular scope of materials made to EN standards, for pressure bearing equipment, from a recognized third party. In addition, it requires a particular finish and temperature grade for the material. It has been unable to find a source in the U.S. that can produce to the particular scope that is required for its product. Importer *** stated that seamless CDMT is sometimes interchangeable for some heavy machinery applications. Importer *** reported that based on the existing section 232 measures that exclude CDMT from Germany and Switzerland, some products are interchangeable while some are not.

Purchasers that reported domestic and subject CDMT a were sometimes or never interchangeable cited quality, limited product range, and inability to produce tubes with the required wall thickness or to customer specifications as reasons that limit interchangeability. Purchaser *** reported that products from the U.S., South Korea, and India are usually interchangeable in most circumstances where "M&M" is not required. Purchaser *** reported that many of the Asian suppliers it works with take a much longer view of market dynamics and therefore offer a much more consistent approach to lead times, deliveries and other commercial terms.

Foreign producers were asked if the CDMT produced and sold in their home markets is interchangeable with the CDMT produced and exported to the U.S. and/or third country markets. Ten of 13 reported that they are interchangeable. Of the three that reported they are not interchangeable, two cited customer specifications limiting interchangeability and one cited tighter tolerances.

Table II-21**CDMT: Count of U.S. producers reporting the interchangeability between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	4	1	0	0
United States vs. Germany	4	1	0	0
United States vs. India	4	1	0	0
United States vs. Italy	4	1	0	0
United States vs. South Korea	4	1	0	0
United States vs. Switzerland	4	1	0	0
China vs. Germany	4	1	0	0
China vs. India	4	1	0	0
China vs. Italy	4	1	0	0
China vs. South Korea	4	1	0	0
China vs. Switzerland	4	1	0	0
Germany vs. India	4	1	0	0
Germany vs. Italy	4	1	0	0
Germany vs. South Korea	4	1	0	0
Germany vs. Switzerland	4	1	0	0
India vs. Italy	4	1	0	0
India vs. South Korea	4	1	0	0
India vs. Switzerland	4	1	0	0
Italy vs. South Korea	4	1	0	0
Italy vs. Switzerland	4	1	0	0
South Korea vs. Switzerland	4	1	0	0
United States vs. Other	3	1	0	0
China vs. Other	3	1	0	0
Germany vs. Other	3	1	0	0
India vs. Other	3	1	0	0
Italy vs. Other	3	1	0	0
South Korea vs. Other	3	1	0	0
Switzerland vs. Other	3	1	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-22
CDMT: Count of importers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	4	1	1
United States vs. Germany	1	1	1	2
United States vs. India	1	3	1	1
United States vs. Italy	1	2	2	2
United States vs. South Korea	1	3	1	1
United States vs. Switzerland	1	1	1	0
China vs. Germany	0	1	1	1
China vs. India	0	3	0	1
China vs. Italy	0	1	1	1
China vs. South Korea	0	3	0	1
China vs. Switzerland	0	1	1	0
Germany vs. India	0	1	1	1
Germany vs. Italy	0	2	1	1
Germany vs. South Korea	0	1	1	1
Germany vs. Switzerland	0	2	0	0
India vs. Italy	0	1	1	1
India vs. South Korea	0	1	1	1
India vs. Switzerland	0	1	1	0
Italy vs. South Korea	0	1	1	1
Italy vs. Switzerland	0	1	1	1
South Korea vs. Switzerland	0	1	0	0
United States vs. Other	1	5	0	1
China vs. Other	1	2	0	0
Germany vs. Other	1	2	2	0
India vs. Other	1	1	1	0
Italy vs. Other	1	1	3	0
South Korea vs. Other	1	1	1	0
Switzerland vs. Other	1	2	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-23
CDMT: Count of purchasers reporting the interchangeability between product produced in the United States and in other countries, by country pair

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	7	2	1
United States vs. Germany	2	2	0	0
United States vs. India	4	4	2	0
United States vs. Italy	3	4	2	1
United States vs. South Korea	2	2	1	0
United States vs. Switzerland	1	0	1	0
China vs. Germany	0	1	0	0
China vs. India	0	1	0	0
China vs. Italy	0	3	0	0
China vs. South Korea	0	1	0	0
China vs. Switzerland	0	0	0	0
Germany vs. India	1	1	0	0
Germany vs. Italy	2	1	1	0
Germany vs. South Korea	0	1	0	0
Germany vs. Switzerland	0	0	1	0
India vs. Italy	1	1	0	0
India vs. South Korea	2	1	1	0
India vs. Switzerland	0	0	0	0
Italy vs. South Korea	0	1	0	0
Italy vs. Switzerland	0	0	0	0
South Korea vs. Switzerland	0	0	0	0
United States vs. Other	0	6	0	0
China vs. Other	0	1	0	0
Germany vs. Other	0	0	0	0
India vs. Other	1	0	0	0
Italy vs. Other	0	1	1	0
South Korea vs. Other	0	1	0	0
Switzerland vs. Other	0	0	0	0

Source: Compiled from data submitted in response to Commission questionnaires.

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of CDMT from the United States, subject, or nonsubject countries. As seen in tables II-24 to II-26, all responding U.S. producers reported that there are sometimes or never significant factors other than price between domestically produced CDMT and CDMT imported from all sources. Importer responses were mixed: half of responding importers reported there were sometimes or never significant factors other than

price between domestically produced CDMT and CDMT imported from China and India, most reported sometimes or never with respect to Germany, and most reported always or frequently with respect to Italy, South Korea, and Switzerland.

In addition to the reasons listed above regarding interchangeability, importer *** reported that finding suitable quality and trustworthiness is frequently challenging and communication factors are always a significant factor. It added that “South Korea is nearly impossible to work with due to the quota factor.” Importer *** reported that CDMT produced in Germany is not always available in the U.S. market and that quality and availability are the main reasons to import German CDMT over U.S. products. Importer *** reported that unlike many U.S. producers, a number of South Korean and Mexican long-tube producers are more willing or able to produce a broader range of dimensions and mechanical specifications that could be considered more difficult to produce.

Most responding purchasers reported that there were sometimes or never significant differences other than price between domestically produced CDMT and CDMT imported from Germany, India, South Korea, and Switzerland, while a majority reported there were always or frequently differences other than price with respect to China and Italy. Purchasers cited ability of producers to meet customer specifications, quality, availability, product range, customer experience, on-time delivery, ease of doing business, respect for the market, payment terms, and testing. Purchaser *** reported that ability to meet quality and specification standards is paramount and it cannot risk the product failing once it is installed in its machines and out in the field. It continued that U.S. mills are currently unable to meet its standards on certain type of tube needs.

Table II-24**CDMT: Count of U.S. producers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	0	0	1	4
United States vs. Germany	0	0	1	4
United States vs. India	0	0	1	4
United States vs. Italy	0	0	1	4
United States vs. South Korea	0	0	1	4
United States vs. Switzerland	0	0	1	4
China vs. Germany	0	0	1	4
China vs. India	0	0	1	4
China vs. Italy	0	0	1	4
China vs. South Korea	0	0	1	4
China vs. Switzerland	0	0	1	4
Germany vs. India	0	0	1	4
Germany vs. Italy	0	0	1	4
Germany vs. South Korea	0	0	1	4
Germany vs. Switzerland	0	0	1	4
India vs. Italy	0	0	1	4
India vs. South Korea	0	0	1	4
India vs. Switzerland	0	0	1	4
Italy vs. South Korea	0	0	1	4
Italy vs. Switzerland	0	0	1	4
South Korea vs. Switzerland	0	0	1	4
United States vs. Other	0	0	0	4
China vs. Other	0	0	0	4
Germany vs. Other	0	0	0	4
India vs. Other	0	0	0	4
Italy vs. Other	0	0	0	4
South Korea vs. Other	0	0	0	4
Switzerland vs. Other	0	0	0	4

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-25**CDMT: Count of importers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	1	3	4	0
United States vs. Germany	2	0	2	1
United States vs. India	1	2	3	0
United States vs. Italy	2	2	3	0
United States vs. South Korea	2	2	1	1
United States vs. Switzerland	1	1	0	0
China vs. Germany	1	0	1	0
China vs. India	1	0	1	1
China vs. Italy	1	0	1	0
China vs. South Korea	1	0	1	0
China vs. Switzerland	0	0	1	0
Germany vs. India	1	0	2	0
Germany vs. Italy	1	0	1	1
Germany vs. South Korea	1	0	1	0
Germany vs. Switzerland	0	0	1	0
India vs. Italy	1	0	1	0
India vs. South Korea	1	0	0	0
India vs. Switzerland	0	1	0	0
Italy vs. South Korea	1	0	0	0
Italy vs. Switzerland	0	0	1	0
South Korea vs. Switzerland	0	0	0	0
United States vs. Other	1	4	1	0
China vs. Other	0	1	2	0
Germany vs. Other	0	1	2	1
India vs. Other	0	2	0	0
Italy vs. Other	0	2	2	0
South Korea vs. Other	0	1	0	0
Switzerland vs. Other	0	1	1	0

Source: Compiled from data submitted in response to Commission questionnaires.

Table II-26**CDMT: Count of purchasers reporting the significance of differences other than price between product produced in the United States and in other countries, by country pair**

Number of firms reporting

Country pair	Always	Frequently	Sometimes	Never
United States vs. China	2	3	1	2
United States vs. Germany	0	0	4	1
United States vs. India	2	1	6	2
United States vs. Italy	2	3	2	2
United States vs. South Korea	0	0	6	1
United States vs. Switzerland	0	0	2	2
China vs. Germany	0	0	1	0
China vs. India	0	0	1	0
China vs. Italy	0	1	1	0
China vs. South Korea	0	0	1	0
China vs. Switzerland	0	0	1	0
Germany vs. India	0	1	2	0
Germany vs. Italy	0	1	2	0
Germany vs. South Korea	0	0	2	0
Germany vs. Switzerland	0	0	2	0
India vs. Italy	0	0	2	0
India vs. South Korea	0	0	5	0
India vs. Switzerland	0	0	1	0
Italy vs. South Korea	0	0	2	0
Italy vs. Switzerland	0	0	1	0
South Korea vs. Switzerland	0	0	1	0
United States vs. Other	3	1	4	1
China vs. Other	0	1	1	0
Germany vs. Other	0	0	1	0
India vs. Other	0	0	2	0
Italy vs. Other	0	2	1	0
South Korea vs. Other	0	0	2	0
Switzerland vs. Other	0	0	1	0

Source: Compiled from data submitted in response to Commission questionnaires.

Elasticity estimates

This section discusses elasticity estimates; parties did not comment on these estimates.

U.S. supply elasticity

The domestic supply elasticity for CDMT measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of CDMT. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced CDMT. Analysis of these factors above indicates that the U.S. industry has the ability to somewhat increase or decrease shipments to the U.S. market; an estimate in the range of 3 to 6 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for CDMT measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of CDMT. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the CDMT in the production of any downstream products. Based on the available information, the aggregate demand for CDMT is likely to be moderately inelastic; a range of -0.5 to -0.8 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.¹⁹ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced CDMT and imported CDMT is likely to be in the range of 3 to 5. Factors contributing to this level of substitutability include similar quality for CDMT, similarities between domestically produced CDMT and CDMT imported from subject countries across multiple purchase factors, and interchangeability between domestic and

¹⁹ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

subject sources. Factors reducing substitutability include availability issues, different lead times from domestic and subject sources, certain types of CDMT only being available only from subject sources, purchaser preferences for CDMT from domestic sources over other sources, and significant factors other than price that firms consider.

Part III: Condition of the U.S. industry

Overview

The information in this section of the report was compiled from responses to the Commission’s questionnaires. Six firms, which accounted for greater than 90 percent of U.S. production of CDMT during 2022, supplied information on their operations in these reviews.¹

Developments in the U.S. industry

Table III-1 presents events in the U.S. industry since January 1, 2017.

Table III-1
CDMT: Developments in the U.S. industry since January 1, 2017

Item	Firm	Event
New equipment	Webco	2017: Webco installed a state-of-the-art finishing line at its Southwest Tube Division facility in Sand Spring, Oklahoma.
Emergence from bankruptcy	Michigan Seamless	October 2017: Michigan Seamless’ corporate parent, Optima Specialty Steel Inc., emerged from bankruptcy (filed in December 2016) upon successfully completing its financial reorganization plans and adopting a new corporate name as Specialty Steel Works Inc. (“SSWI”).
Employee bonus payments	Zekelman	March 2018: Zekelman announced a \$1,000 annual bonus for its employees, including those of its Sharon Tube Division, that produces CDMT among other steel tubular products at its facility in Farrell, Pennsylvania. Employees will receive this bonus once the section 232 steel tariffs enter into force and for as long as they remain in force.
Name change	Nippon Steel Pipe America	March 2019: Seymour Tubing Inc., a producer of welded and CDMT of carbon and stainless steels at its facility in Seymour, Indiana, underwent a corporate name change to (rather than being acquired by) “Nippon Steel Pipe America Inc.” to reflect its “global connections and global capabilities” with other Nippon Steel Corp. firms worldwide.
Employee bonus payments	Zekelman	March 2021: Zekelman announced continued payment of the previously announced \$1,000 annual bonus for its employees, including those at the Sharon Tube facility in Farrell, Pennsylvania, as the section 232 steel tariffs remained in force under the new Presidential administration. According to the firm’s Executive Chairman: “Since the 232 tariffs came into effect, we have increased our capital investments more than \$350 million over historical levels, hired over 400 new teammates (to full-time, well-paying jobs) and paid over \$10.3 million in annual 232 bonuses to our teammates.”

Table continued.

¹ Coverage is calculated based on total U.S. production estimated by domestic interested parties. Domestic interested parties’ response to the notice of institution, February 2, 2023, pp. 14-15 and exh. 1.

Table III-1 Continued

CDMT: Developments in the U.S. industry since January 1, 2017

Item	Firm	Event
New labor contract	ArcelorMittal	November 2021: ArcelorMittal reached a tentative agreement to settle a labor strike at its facility in Shelby, Ohio. The local union membership ratified a new four-year labor contract 10 days after calling for a strike when the prior four-year contract expired at the end of October. This facility produces seamless and welded precision tubes, drawn-over-mandrel (“DOM”) and cold-drawn tubes.
Acquisition	PTC Alliance	December 2021: PTC Alliance completed its acquisition of Metal-Matic LLC’s business line that produces welded and drawn-over-mandrel (“DOM”) carbon steel tubing for standard and specialty applications at four facilities located in Illinois, Minnesota, and Ohio, with over 500 employees. Great Rock Capital provided a \$28.8 million senior secured term loan to fund this acquisition which also provided some additional capital for PTC Alliance.

Source: Webco, “Webco Industries, History,” web page, <https://www.webcotube.com/webco-a-forever-kind-of-company/history/>, accessed March 9, 2023; BusinessWire, “Optima Specialty Steel Inc. Completes Financial Restructuring and Emerges from Bankruptcy,” November 16, 2017, <https://www.businesswire.com/news/home/20171116005860/en/Optima-Specialty-Steel-Inc.-Completes-Financial-Restructuring-and-Emerges-from-Bankruptcy>; Association for Iron & Steel Technology (“AIST”), “Optima Specialty Steel Exits Chapter 11 Bankruptcy,” AIST Steel News, November 17, 2017, <https://www.aist.org/news/steel-news/2017/november/13-17-november-2017/optima-specialty-steel-exits-chapter-11-bankruptcy/>; Zekelman, “Zekelman Industries Celebrates Steel Trade Policy Changes with Employee Bonus,” news release, March 1, 2018, <https://www.zekelman.com/news/zekelman-industries-celebrates-steel-trade-policy-changes-employee-bonus/>; Sharon Tube, “State of the Art Manufacturing Facilities,” ©2023, <https://www.sharontube.com/manufacturing-facility/>, accessed October 27, 2023; Jordan Richart, “Manufacturer Announces Name Change, Under Same Ownership,” The Tribune, April 1, 2019, <http://tribtown.com/2019/04/01/manufacturer-announces-name-change-under-same-ownership/>; Nippon Steel Pipe America, “About Us,” no date, <https://www.nipponsteelpipeamerica.com/about-us/>, accessed October 27, 2023; Zemelman, “Zekelman Industries Celebrates Anniversary and Continuation of Section 232 Duties on Steel with Employee Bonus,” news release, March 19, 2021, <https://www.zekelman.com/news/zekelman-industries-celebrates-anniversary-and-continuation-of-section-232-duties-on-steel-with-employee-bonus/>; David Jacobs, “Shelby Strike: Tentative Agreement Reported,” Shelby Daily Globe, November 10, 2021, https://www.sdgnewsgroup.com/news/shelby-strike-tentative-agreement-reported/article_c35937e0-422c-11ec-b844-2fc7c10117bc.html; Louis Whitmire, “Shelby Steelworkers Ratify Contract, Headed Back to Work at ArcelorMittal,” Mansfield News Journal, November 11, 2021, <https://www.mansfieldnewsjournal.com/story/news/2021/11/11/shelby-steelworkers-local-3057-ratify-contract-headed-back-work/6389617001/>; Metal Industry News Staff, “PTC Alliance Acquires Metal-Matic,” December 28, 2021; <https://www.metalcenternews.com/editorial/metal-industry-news/ptc-alliance-acquires-metal-matic/44558>; GulfStar Group, “Metal-Matic Has Been Acquired by PTC Alliance,” January 13, 2022, <https://gulfstargroup.com/press-releases/view/metal-matic-has-been-acquired-by-ptc-alliance/>; Abby Latour, “PTC Alliance Nets Loan for Add-on, Extra Capital,” S&P Global Market Intelligence, January 25, 2022, <https://www.spglobal.com/marketintelligence/en/news-insights/latest-news-headlines/ptc-alliance-nets-loan-for-add-on-extra-capital-68571122>; Domestic interested parties’ response to notice of institution, p. 15, exh. 5.

Changes experienced by the industry

Producers in the United States were asked to report any change in the character of their operations or organization relating to the production of CDMT since January 1, 2017. Four of six producers indicated in their questionnaires that they had experienced such changes. Table III-2 presents the changes identified by these producers.

Table III-2
CDMT: Reported changes in operations since January 1, 2017

Type of change	Firm name and narrative on changes in operations
Prolonged shutdowns	***
Prolonged shutdowns	***
Production curtailments	***
Production curtailments	***
Relocations	***
Expansions	***
Acquisitions	***
Other	***
Other	***
Other	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission asked domestic producers to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm’s supply chain arrangements, production, employment, and shipments relating to CDMT. Table III-3 presents the firms’ responses to this question.

Table III-3
CDMT: Impact of COVID-19 on U.S. producers’ operations, by firm

Firm	Narrative on COVID-19 impact on operations
***	***
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Anticipated changes in operations

The Commission asked domestic producers to report anticipated changes in the character of their operations relating to the production of CDMT. One firm responded that it anticipates such changes. That response appears in table III-4.

Table III-4
CDMT: Anticipated changes in operations

Firm	Firm name and narrative on anticipated changes in operations
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. production, capacity, and capacity utilization

Table III-5 presents U.S. producers' installed capacity, practical capacity, production, and utilization on the same equipment as in-scope production. Table III-6 and figure III-1 present U.S. producers' production, practical CDMT capacity, and capacity utilization on a firm-by-firm basis.

U.S. producers' combined installed overall capacity remained unchanged, except for a 0.3 percent increase from 2019 and another 0.3 percent increase from 2020 to 2021.² U.S. producers' combined practical overall capacity and practical CDMT capacity followed similar trends to each other, increasing from 2017 to 2018, declining in 2019 and 2020, before increasing again in 2021 and 2022 to a level below that reported in 2017. Practical overall capacity and practical CDMT capacity was lower in interim 2023 than in interim 2022.³

Following a somewhat similar trend to practical capacity, U.S. producers' aggregate CDMT production was 4.4 percent lower in 2022 than in 2017, and was 6.6 percent lower in interim 2023 compared with interim 2022. The U.S. producers' practical capacity utilization rate for CDMT followed a similar trend to CDMT capacity and production, increasing from 81.3 percent in 2017 to 88.5 percent in 2018, before declining to 75.9 percent in 2019 and 76.2 percent in 2020, the year in which the market was most affected by the COVID pandemic, and then increasing again to 85.0 percent in 2021. The U.S. producers' practical capacity utilization rate for CDMT was higher at 83.5 percent in 2022 than in 2017, but was 2.6 percentage points lower during interim 2023 compared with interim 2022.⁴

² The increase in installed overall capacity from 2019 to 2021 reflects ***.

³ The U.S. producers' combined trends in capacity were driven primarily by ***. ***. ***.

⁴ The domestic interested parties state that "in 2020, the onset of COVID caused an unexpected drop in demand, with the ripple effects of supply chain disruptions, changes in raw material costs and availability, and some short-lived production disruptions." Domestic interested parties' prehearing brief, p. 89.

Table III-5**CDMT: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as in-scope production, by period**

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	994,101	994,101	994,101
Installed overall	Production	634,940	697,226	589,228
Installed overall	Utilization	63.9	70.1	59.3
Practical overall	Capacity	754,308	780,961	755,916
Practical overall	Production	634,940	697,226	589,228
Practical overall	Utilization	84.2	89.3	77.9
Practical CDMT	Capacity	575,200	601,785	585,077
Practical CDMT	Production	467,402	532,461	443,965
Practical CDMT	Utilization	81.3	88.5	75.9

Table continued.

Table III-5 Continued**CDMT: U.S. producers' installed and practical capacity, production, and utilization on the same equipment as in-scope production, by period**

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	997,390	1,000,679	1,000,679	502,834	502,834
Installed overall	Production	488,326	587,728	571,561	295,392	285,486
Installed overall	Utilization	49.0	58.7	57.1	58.7	56.8
Practical overall	Capacity	621,075	693,453	671,743	344,889	335,603
Practical overall	Production	488,326	587,728	571,561	295,392	285,486
Practical overall	Utilization	78.6	84.8	85.1	85.6	85.1
Practical CDMT	Capacity	479,587	530,241	535,029	274,836	264,653
Practical CDMT	Production	365,231	450,903	446,950	236,659	220,987
Practical CDMT	Utilization	76.2	85.0	83.5	86.1	83.5

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-6
CDMT: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	575,200	601,785	585,077

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Practical capacity

Capacity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	479,587	530,241	535,029	274,836	264,653

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Production

Production in short tons

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	467,402	532,461	443,965

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Production

Production in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	365,231	450,903	446,950	236,659	220,987

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	81.3	88.5	75.9

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Capacity utilization

Capacity utilization in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	76.2	85.0	83.5	86.1	83.5

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Share of production

Share in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	100.0	100.0	100.0

Table continued.

Table III-6 Continued
CDMT: U.S. producers' output, by firm and period

Share of production

Share in percent

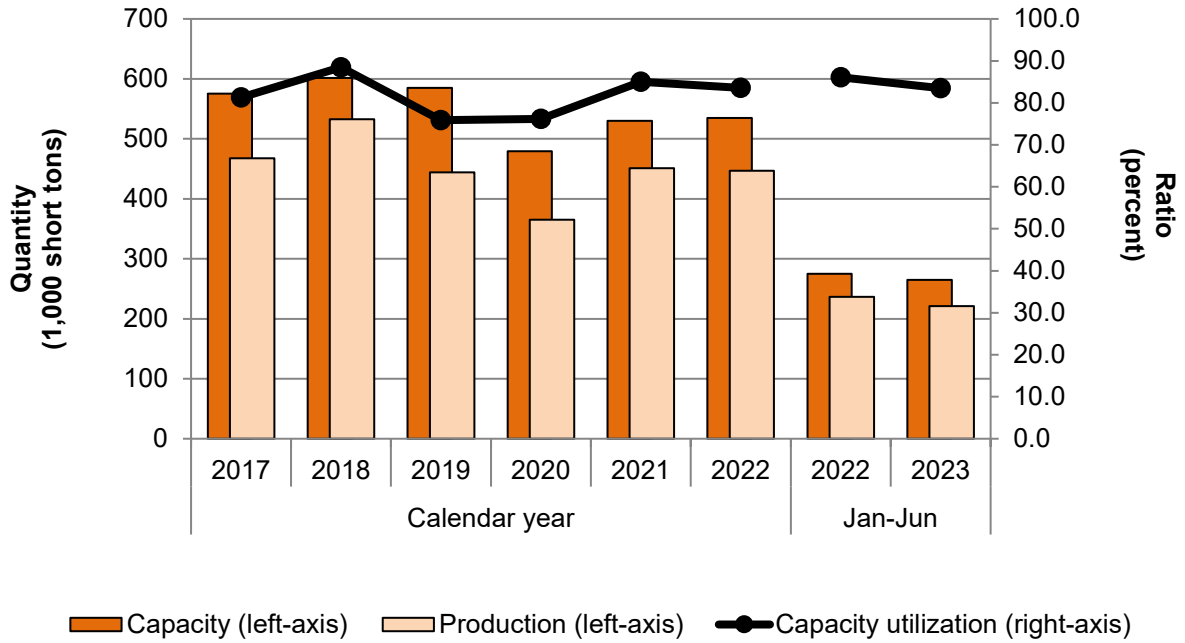
Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Note: Capacity utilization ratio represents the ratio of the U.S. producer's production to its production capacity.

Figure III-1
CDMT: U.S. producers' capacity, production, and capacity utilization, by period



Source: Compiled from data submitted in response to Commission questionnaires.

Alternative products

As shown in table III-7, CDMT accounted for approximately three-fourths or more of total production on shared equipment during each of the periods examined during 2017-22 and January-June 2023. All responding U.S. producers reported producing out-of-scope items using the same equipment as subject production.⁵

Table III-7
CDMT: U.S. producers' overall production on the same equipment as in-scope production, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2017	2018	2019
CDMT	Quantity	467,402	532,461	443,965
Other products	Quantity	167,538	164,765	145,263
All products	Quantity	634,940	697,226	589,228
CDMT	Share	73.6	76.4	75.3
Other products	Share	26.4	23.6	24.7
All products	Share	100.0	100.0	100.0

Table continued.

Table III-7 Continued
CDMT: U.S. producers' overall production on the same equipment as in-scope production, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CDMT	Quantity	365,231	450,903	446,950	236,659	220,987
Other products	Quantity	123,095	136,825	124,611	58,733	64,499
All products	Quantity	488,326	587,728	571,561	295,392	285,486
CDMT	Share	74.8	76.7	78.2	80.1	77.4
Other products	Share	25.2	23.3	21.8	19.9	22.6
All products	Share	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

⁵ Out-of-scope items include ***.

Constraints on capacity

All responding U.S. producers reported constraints in the manufacturing process. Table III-8 presents U.S. producers' reported narratives on practical overall capacity constraints.

Table III-8
CDMT: U.S. producers' reported capacity constraints since January 1, 2017

Type of constraint	Firm name and narrative on reported constraint to practical overall capacity
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Existing labor force	***
Supply of material inputs	***

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' U.S. shipments and exports

Table III-9 presents U.S. producers' U.S. shipments, export shipments, and total shipments. The U.S. producers' aggregate U.S. shipments consistently accounted for more than 82 percent of their combined total shipments by quantity.⁶ U.S. shipment quantities increased by 15.9 percent from 2017 to 2018 before declining by 29.7 percent from 2018 to 2020 and then increasing by 21.7 percent from 2020 to 2022 to a level that was 0.8 percent below that reported in 2017. U.S. shipments were 2.6 percent lower during interim 2023 compared with interim 2022. The average unit values of U.S. shipments increased overall from a low of \$1,786 per short ton in 2017 to \$2,996 per short ton in 2022, but were lower at \$2,622 per short ton in interim 2023 compared with \$3,133 per short ton in interim 2022. U.S. producers' export shipments, which were primarily destined for Australia, Canada, Mexico, and the United Kingdom, accounted for 18 percent or less of total shipments by quantity. Export shipment quantities declined irregularly by 19.3 percent from 2017 to 2022 and were 16.3 percent lower in interim 2023 than in interim 2022.

⁶ U.S. producers' U.S. shipments are comprised almost entirely of commercial U.S. shipments. Internal U.S. consumption and U.S. transfers to related firms combined accounted for *** of U.S. producers' total U.S. shipments in each period examined in these five-year reviews.

Table III-9
CDMT: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2017	2018	2019
U.S. shipments	Quantity	382,570	443,330	392,899
Export shipments	Quantity	80,221	80,973	63,390
Total shipments	Quantity	462,791	524,303	456,289
U.S. shipments	Value	683,238	886,795	780,289
Export shipments	Value	149,964	165,044	126,544
Total shipments	Value	833,202	1,051,839	906,833
U.S. shipments	Unit value	1,786	2,000	1,986
Export shipments	Unit value	1,869	2,038	1,996
Total shipments	Unit value	1,800	2,006	1,987
U.S. shipments	Share of quantity	82.7	84.6	86.1
Export shipments	Share of quantity	17.3	15.4	13.9
Total shipments	Share of quantity	100.0	100.0	100.0
U.S. shipments	Share of value	82.0	84.3	86.0
Export shipments	Share of value	18.0	15.7	14.0
Total shipments	Share of value	100.0	100.0	100.0

Table continued.

Table III-9 Continued
CDMT: U.S. producers' shipments, by destination and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; shares in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
U.S. shipments	Quantity	311,705	363,046	379,372	201,715	196,412
Export shipments	Quantity	56,367	77,307	64,750	35,984	30,135
Total shipments	Quantity	368,072	440,353	444,122	237,699	226,547
U.S. shipments	Value	557,262	927,674	1,136,502	631,972	514,988
Export shipments	Value	99,537	194,405	198,572	116,072	75,577
Total shipments	Value	656,799	1,122,079	1,335,074	748,044	590,565
U.S. shipments	Unit value	1,788	2,555	2,996	3,133	2,622
Export shipments	Unit value	1,766	2,515	3,067	3,226	2,508
Total shipments	Unit value	1,784	2,548	3,006	3,147	2,607
U.S. shipments	Share of quantity	84.7	82.4	85.4	84.9	86.7
Export shipments	Share of quantity	15.3	17.6	14.6	15.1	13.3
Total shipments	Share of quantity	100.0	100.0	100.0	100.0	100.0
U.S. shipments	Share of value	84.8	82.7	85.1	84.5	87.2
Export shipments	Share of value	15.2	17.3	14.9	15.5	12.8
Total shipments	Share of value	100.0	100.0	100.0	100.0	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Internal U.S. consumption and U.S. transfers to related firms combined accounted for 3.3 percent or less of U.S. producers' total U.S. shipments in each period presented.

U.S. producers' inventories

Table III-10 presents U.S. producers' end-of-period inventories and the ratio of these inventories to U.S. producers' production, U.S. shipments, and total shipments. ***. Following a somewhat similar trend to U.S. producers' aggregate production and shipments, U.S. producers' inventories increased by 20.5 percent from 2017 to 2018 before declining by 49.1 percent from 2018 to 2020, and then increasing by 56.2 percent from 2020 to 2022 to a level 4.3 percent below that reported in 2017. U.S. producers' CDMT inventories were 12.4 percent lower during interim 2023 compared with interim 2022. The ratio of U.S. producers' inventories to U.S. production ranged between 5.0 percent and 6.8 percent, while the ratio of U.S. producers' inventories to U.S. shipments ranged between 5.8 percent and 8.2 percent.

Table III-10
CDMT: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratios in percent

Item	Measure	2017	2018	2019
End-of-period inventory	Quantity	30,092	36,247	23,080
Inventory to U.S. production	Ratio	6.4	6.8	5.2
Inventory to U.S. shipments	Ratio	7.9	8.2	5.9
Inventory to total shipments	Ratio	6.5	6.9	5.1

Table continued.

Table III-10 Continued
CDMT: U.S. producers' inventories and their ratio to select items, by period

Quantity in short tons; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
End-of-period inventory	Quantity	18,438	27,875	28,801	25,889	22,675
Inventory to U.S. production	Ratio	5.0	6.2	6.4	5.5	5.1
Inventory to U.S. shipments	Ratio	5.9	7.7	7.6	6.4	5.8
Inventory to total shipments	Ratio	5.0	6.3	6.5	5.4	5.0

Source: Compiled from data submitted in response to Commission questionnaires.

U.S. producers' imports from subject sources

No responding U.S. producer directly imports CDMT into the United States and no responding U.S. producer is related to a U.S. importer of CDMT.

U.S. producers' purchases of imports from subject sources

No responding U.S. producer reported purchases of CDMT imported from subject sources. One U.S. producer (***) reported purchases of CDMT imported from nonsubject and other sources.⁷ *** reported that it purchased CDMT because ***.

U.S. employment, wages, and productivity

Table III-11 shows U.S. producers' employment-related data. Following a somewhat similar trend to U.S. producers' aggregate production and shipments, the number of production and related workers ("PRWs") and their total hours worked reported by U.S. producers combined increased from 2017 to 2018, decreased from 2018 to 2020, and increased from 2020 to 2022. The number of PRWs and total hours worked were lower in interim 2023 than in interim 2022. Hourly wages increased overall by 21.2 percent from 2017 to 2022, and were 5.4 percent higher during interim 2023 compared with interim 2022.⁸ Productivity ranged from a low of 80.6 short tons per 1,000 hours in 2020 to a high of 90.7 short tons per 1,000 hours in 2021.

⁷ ***.

⁸ The largest hourly wage increase since 2017 was reported by ***.

Table III-11**CDMT: U.S. producers' employment related information, by period**

Item	2017	2018	2019
Production and related workers (PRWs) (number)	2,257	2,475	2,377
Total hours worked (1,000 hours)	5,446	5,908	5,419
Hours worked per PRW (hours)	2,413	2,387	2,280
Wages paid (\$1,000)	144,098	164,741	149,529
Hourly wages (dollars per hour)	\$26.46	\$27.88	\$27.59
Productivity (short tons per 1,000 hours)	85.8	90.1	81.9
Unit labor costs (dollars per short ton)	\$308	\$309	\$337

Table continued.

Table III-11 Continued**CDMT: U.S. producers' employment related information, by period**

Item	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Production and related workers (PRWs) (number)	2,107	2,184	2,226	2,255	2,152
Total hours worked (1,000 hours)	4,532	4,974	5,163	2,627	2,512
Hours worked per PRW (hours)	2,151	2,277	2,319	1,165	1,167
Wages paid (\$1,000)	126,876	154,516	165,637	84,445	85,089
Hourly wages (dollars per hour)	\$28.00	\$31.06	\$32.08	\$32.15	\$33.87
Productivity (short tons per 1,000 hours)	80.6	90.7	86.6	90.1	88.0
Unit labor costs (dollars per short ton)	\$347	\$343	\$371	\$357	\$385

Source: Compiled from data submitted in response to Commission questionnaires.

Financial experience of U.S. producers

Background⁹

The financial results of six U.S. producers of CDMT are presented in this section of the report. One firm, ***, reported its results on the basis of International Financial Reporting Standards (“IFRS”), while all other firms reported their results on a GAAP basis. All of the responding companies provided their annual financial results on a calendar-year basis, as requested.¹⁰

Figure III-2 presents the relative sizes of the responding firms by showing each firm’s share of the total reported net sales quantity in 2022.

⁹ The following abbreviations are used in the tables and/or text of this section: generally accepted accounting principles (“GAAP”), fiscal year (“FY”), net sales (“NS”), cost of goods sold (“COGS”), selling, general, and administrative expenses (“SG&A expenses”), average unit values (“AUVs”), research and development (“R&D”), and return on assets (“ROA”).

¹⁰ ***. U.S. producers’ questionnaire responses, sections III-2.A.1 and III-14.

Figure III-2
CDMT: U.S. producers' share of net sales quantity in 2022, by firm

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CDMT

Table III-12 presents aggregated data on U.S. producers' operations in relation to CDMT, while table III-13 presents corresponding changes in AUVs. Table III-14 presents selected company-specific financial data.

Table III-12
CDMT: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2017	2018	2019
Commercial sales	Quantity	***	***	***
Internal consumption	Quantity	***	***	***
Transfers to related firms	Quantity	***	***	***
Total net sales	Quantity	462,791	524,303	456,289
Commercial sales	Value	***	***	***
Internal consumption	Value	***	***	***
Transfers to related firms	Value	***	***	***
Total net sales	Value	833,202	1,051,839	906,833
COGS: Raw materials	Value	408,597	559,408	466,266
COGS: Direct labor	Value	165,148	183,496	166,786
COGS: Other factory	Value	173,328	193,466	197,980
COGS: Total	Value	747,073	936,370	831,032
Gross profit or (loss)	Value	86,129	115,469	75,801
SG&A expenses	Value	43,789	56,065	46,046
Operating income or (loss)	Value	42,340	59,404	29,755
Other expenses/(income), net	Value	13,149	9,091	8,307
Net income or (loss)	Value	29,191	50,313	21,448
Depreciation/amortization	Value	40,357	39,984	42,862
Cash flow	Value	69,548	90,297	64,310
COGS: Raw materials	Ratio to NS	49.0	53.2	51.4
COGS: Direct labor	Ratio to NS	19.8	17.4	18.4
COGS: Other factory	Ratio to NS	20.8	18.4	21.8
COGS: Total	Ratio to NS	89.7	89.0	91.6
Gross profit	Ratio to NS	10.3	11.0	8.4
SG&A expense	Ratio to NS	5.3	5.3	5.1
Operating income or (loss)	Ratio to NS	5.1	5.6	3.3
Net income or (loss)	Ratio to NS	3.5	4.8	2.4

Table continued.

Table III-12 Continued
CDMT: U.S. producers' results of operations, by item and period

Quantity in short tons; value in 1,000 dollars; ratios in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Commercial sales	Quantity	***	***	***	***	***
Internal consumption	Quantity	***	***	***	***	***
Transfers to related firms	Quantity	***	***	***	***	***
Total net sales	Quantity	368,072	440,353	444,122	237,699	226,547
Commercial sales	Value	***	***	***	***	***
Internal consumption	Value	***	***	***	***	***
Transfers to related firms	Value	***	***	***	***	***
Total net sales	Value	656,799	1,122,079	1,335,074	748,044	590,565
COGS: Raw materials	Value	301,931	635,739	789,493	442,234	278,354
COGS: Direct labor	Value	142,375	171,712	178,129	93,689	91,851
COGS: Other factory	Value	163,458	150,274	216,227	108,862	115,071
COGS: Total	Value	607,764	957,725	1,183,849	644,785	485,276
Gross profit or (loss)	Value	49,035	164,354	151,225	103,259	105,289
SG&A expenses	Value	45,249	61,331	56,266	28,734	25,309
Operating income or (loss)	Value	3,786	103,023	94,959	74,525	79,980
Other expenses/(income), net	Value	7,465	10,981	16,312	5,763	5,359
Net income or (loss)	Value	(3,679)	92,042	78,647	68,762	74,621
Depreciation/amortization	Value	40,583	37,807	33,567	18,670	14,984
Cash flow	Value	36,904	129,849	112,214	87,432	89,605
COGS: Raw materials	Ratio to NS	46.0	56.7	59.1	59.1	47.1
COGS: Direct labor	Ratio to NS	21.7	15.3	13.3	12.5	15.6
COGS: Other factory	Ratio to NS	24.9	13.4	16.2	14.6	19.5
COGS: Total	Ratio to NS	92.5	85.4	88.7	86.2	82.2
Gross profit	Ratio to NS	7.5	14.6	11.3	13.8	17.8
SG&A expense	Ratio to NS	6.9	5.5	4.2	3.8	4.3
Operating income or (loss)	Ratio to NS	0.6	9.2	7.1	10.0	13.5
Net income or (loss)	Ratio to NS	(0.6)	8.2	5.9	9.2	12.6

Table continued.

Table III-12 Continued
CDMT: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2017	2018	2019
COGS: Raw materials	Share	54.7	59.7	56.1
COGS: Direct labor	Share	22.1	19.6	20.1
COGS: Other factory	Share	23.2	20.7	23.8
COGS: Total	Share	100.0	100.0	100.0
Commercial sales	Unit value	1,776	1,987	1,967
Internal consumption	Unit value	2,764	3,047	3,036
Transfers to related firms	Unit value	1,895	2,075	2,020
Total net sales	Unit value	1,800	2,006	1,987
COGS: Raw materials	Unit value	883	1,067	1,022
COGS: Direct labor	Unit value	357	350	366
COGS: Other factory	Unit value	375	369	434
COGS: Total	Unit value	1,614	1,786	1,821
Gross profit or (loss)	Unit value	186	220	166
SG&A expenses	Unit value	95	107	101
Operating income or (loss)	Unit value	91	113	65
Net income or (loss)	Unit value	63	96	47
Operating losses	Count	1	1	1
Net losses	Count	1	1	1
Data	Count	6	6	6

Table continued.

Table III-12 Continued
CDMT: U.S. producers' results of operations, by item and period

Shares in percent; unit values in dollars per short ton; count in number of firms reporting

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
COGS: Raw materials	Share	49.7	66.4	66.7	68.6	57.4
COGS: Direct labor	Share	23.4	17.9	15.0	14.5	18.9
COGS: Other factory	Share	26.9	15.7	18.3	16.9	23.7
COGS: Total	Share	100.0	100.0	100.0	100.0	100.0
Commercial sales	Unit value	1,764	2,529	2,991	3,131	2,588
Internal consumption	Unit value	2,931	3,693	4,015	4,215	3,836
Transfers to related firms	Unit value	1,779	2,588	2,510	2,674	1,954
Total net sales	Unit value	1,784	2,548	3,006	3,147	2,607
COGS: Raw materials	Unit value	820	1,444	1,778	1,860	1,229
COGS: Direct labor	Unit value	387	390	401	394	405
COGS: Other factory	Unit value	444	341	487	458	508
COGS: Total	Unit value	1,651	2,175	2,666	2,713	2,142
Gross profit or (loss)	Unit value	133	373	341	434	465
SG&A expenses	Unit value	123	139	127	121	112
Operating income or (loss)	Unit value	10	234	214	314	353
Net income or (loss)	Unit value	(10)	209	177	289	329
Operating losses	Count	3	---	---	---	---
Net losses	Count	4	1	---	---	---
Data	Count	6	6	6	6	6

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares represent the share of COGS.

Table III-13
CDMT: Changes in AUVs between comparison periods

Changes in percent

Item	2017-22	2017-18	2018-19	2019-20	2020-21	2021-22	Jan-Jun 2022-23
Commercial sales	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Internal consumption	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Transfers to related firms	▲***	▲***	▼***	▼***	▲***	▼***	▼***
Total net sales	▲67.0	▲11.4	▼(0.9)	▼(10.2)	▲42.8	▲18.0	▼(17.2)
COGS: Raw materials	▲101.3	▲20.8	▼(4.2)	▼(19.7)	▲76.0	▲23.1	▼(34.0)
COGS: Direct labor	▲12.4	▼(1.9)	▲4.4	▲5.8	▲0.8	▲2.9	▲2.9
COGS: Other factory	▲30.0	▼(1.5)	▲17.6	▲2.4	▼(23.2)	▲42.7	▲10.9
COGS: Total	▲65.1	▲10.6	▲2.0	▼(9.3)	▲31.7	▲22.6	▼(21.0)

Table continued.

Table III-13 Continued
CDMT: Changes in AUVs between comparison periods

Changes in dollars per short ton

Item	2017-22	2017-18	2018-19	2019-20	2020-21	2021-22	Jan-Jun 2022-23
Commercial sales	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Internal consumption	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Transfers to related firms	▲***	▲***	▼***	▼***	▲***	▼***	▼***
Total net sales	▲1,206	▲206	▼(19)	▼(203)	▲764	▲458	▼(540)
COGS: Raw materials	▲895	▲184	▼(45)	▼(202)	▲623	▲334	▼(632)
COGS: Direct labor	▲44	▼(7)	▲16	▲21	▲3	▲11	▲11
COGS: Other factory	▲112	▼(6)	▲65	▲10	▼(103)	▲146	▲50
COGS: Total	▲1,051	▲172	▲35	▼(170)	▲524	▲491	▼(571)
Gross profit or (loss)	▲154	▲34	▼(54)	▼(33)	▲240	▼(33)	▲30
SG&A expense	▲32	▲12	▼(6)	▲22	▲16	▼(13)	▼(9)
Operating income or (loss)	▲122	▲22	▼(48)	▼(55)	▲224	▼(20)	▲40
Net income or (loss)	▲114	▲33	▼(49)	▼(57)	▲219	▼(32)	▲40

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-14
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	462,791	524,303	456,289

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales quantity

Quantity in short tons

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	368,072	440,353	444,122	237,699	226,547

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	833,202	1,051,839	906,833

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net sales value

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	656,799	1,122,079	1,335,074	748,044	590,565

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	747,073	936,370	831,032

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	607,764	957,725	1,183,849	644,785	485,276

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	86,129	115,469	75,801

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	49,035	164,354	151,225	103,259	105,289

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	43,789	56,065	46,046

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	45,249	61,331	56,266	28,734	25,309

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	42,340	59,404	29,755

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	3,786	103,023	94,959	74,525	79,980

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	29,191	50,313	21,448

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss)

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	(3,679)	92,042	78,647	68,762	74,621

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	89.7	89.0	91.6

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

COGS to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	92.5	85.4	88.7	86.2	82.2

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	10.3	11.0	8.4

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Gross profit or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	7.5	14.6	11.3	13.8	17.8

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	5.3	5.3	5.1

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

SG&A expenses to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	6.9	5.5	4.2	3.8	4.3

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	5.1	5.6	3.3

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Operating income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	0.6	9.2	7.1	10.0	13.5

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	3.5	4.8	2.4

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Net income or (loss) to net sales ratio

Ratios in percent

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	(0.6)	8.2	5.9	9.2	12.6

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	1,800	2,006	1,987

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net sales value

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	1,784	2,548	3,006	3,147	2,607

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	883	1,067	1,022

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit raw material

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	820	1,444	1,778	1,860	1,229

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	357	350	366

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit direct labor

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	387	390	401	394	405

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	375	369	434

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit other factory costs

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	444	341	487	458	508

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	1,614	1,786	1,821

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit COGS

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	1,651	2,175	2,666	2,713	2,142

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	186	220	166

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit gross profit or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	133	373	341	434	465

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	95	107	101

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit SG&A expenses

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	123	139	127	121	112

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	91	113	65

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit operating income or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	10	234	214	314	353

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	63	96	47

Table continued.

Table III-14 Continued
CDMT: U.S. producers' sales, costs/expenses, and profitability, by firm and period

Unit net income or (loss)

Unit values in dollars per short ton

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	(10)	209	177	289	329

Source: Compiled from data submitted in response to Commission questionnaires.

Net sales

As shown in table III-12, the industry's net sales are comprised primarily of commercial sales but also include relatively small amounts of internal consumption and transfers to related firms.¹¹ Total net sales quantity fluctuated during the period examined but decreased overall between 2017 and 2022. Total net sales value also fluctuated during the period examined but increased overall from 2017 to 2022. Both net sales quantity and value were lower in interim 2023 than in interim 2022. On a per-short ton basis, net sales increased irregularly from \$1,800 per short ton in 2017 to \$3,006 per short ton in 2022. The net sales AUV was lower in interim 2023, at \$2,607 per short ton, than in interim 2022, at \$3,147 per short ton. While net sales AUVs fluctuated throughout the period examined, the 2021 and 2022 increases were more pronounced than changes in other periods. Between 2017 and 2020, the net sales AUVs remained between \$1,784 per short ton (2020) and \$2,006 per short ton (2018), whereas the net sales AUV in 2021 and 2022 increased to \$2,548 and \$3,006 per short ton, respectively.^{12 13}

The company-specific directional trends were mixed for net sales quantity. Half of the responding companies reported an overall decrease in net sales volume between 2017 and 2022 and four of six reported a higher net sales volume in interim 2023 than in interim 2022.¹⁴ The company-specific directional trends for net sales value were somewhat more uniform, with five of the six firms reporting an overall increase from 2017 to 2022 and four of the six

¹¹ Transfers to related firms and internal consumption accounted for a combined *** percent of total net sales quantity in 2022. Transfers to related firms were reported by *** and internal consumption was reported by ***. In response to questions by staff, ***. Email from ***.

¹² In response to questions from Commission staff, many of the firms indicated that the relatively large increases in net sales AUVs in 2021 and 2022 were the result of sharp increases in steel prices during this time. ***. ***. Emails from ***.

¹³ ***. Email from ***.

¹⁴ ***.

reporting a lower net sales value in interim 2023 than in interim 2022. On a per-unit basis, all firms reported an overall increase in their net sales AUVs from 2017 to 2022 and four reported a lower net sales AUV in interim 2023 than in interim 2022.

Cost of goods sold and gross profit or loss

Raw material costs represented the largest component of COGS. As a share of COGS, raw materials accounted for between 49.7 percent (in 2020) and 68.6 percent (in interim 2022). On a per-short ton basis, raw material costs fluctuated during the period examined but increased overall, more than doubling between 2017 and 2022. They were lower in interim 2023 (at \$1,229) than they were in interim 2022 (at \$1,860).¹⁵ As shown in table III-14, all of the responding U.S. producers reported an overall increase in their raw material cost AUVs from 2017 to 2022, and four of six reported lower raw material cost AUVs in interim 2023 than in interim 2022.

Table III-15 presents raw materials, by type.¹⁶ Hot-rolled steel sheet is the primary input for welded CDMT and seamless CDMT is primarily made from steel bar or billets. Tubing hollows, an intermediate product, can be welded or seamless.

Table III-15
CDMT: U.S. producers' raw material costs in 2022

Value in 1,000 dollars; unit values in dollars per short ton; share of value in percent

Item	Value	Share of value
Hot-rolled steel sheet	***	***
Steel bar	***	***
Tubing hollows	***	***
Billets	***	***
Other material inputs	***	***
All raw materials	789,493	100.0

Source: Compiled from data submitted in response to Commission questionnaires.

¹⁵ As mentioned previously, many firms reported that steel costs increased sharply in 2021 and 2022 but were lower in interim 2023 than in interim 2022. Emails from ***.

¹⁶ ***. U.S. producer questionnaire responses, section III-6 and III-7a.

Direct labor represented the smallest share of total COGS in each period except in 2021. It accounted for between 14.5 percent (in interim 2022) and 23.4 percent (in 2020) of total COGS during the period examined. On a per-short ton basis direct labor increased irregularly from 2017 to 2022 and was higher in interim 2023 than in interim 2022. All of the responding firms reported an overall increase in their direct labor AUVs from 2017 to 2022, and all but one reported higher direct labor AUVs in interim 2023 than in interim 2022.

Other factory costs, the second largest component of COGS in each period except 2021, represented between 15.7 percent (2021) and 26.9 percent (2020) of total COGS during the period examined. On a per-short ton basis other factory costs increased irregularly from 2017 to 2022 and were higher in interim 2023 than in interim 2022. All of the responding firms reported an overall increase in their other factory cost AUVs from 2017 to 2022, but only half reported higher other factory cost AUVs in interim 2023 than in interim 2022.^{17 18}

As a ratio to net sales, COGS fluctuated but decreased overall from 89.7 percent in 2017 to 88.7 percent in 2022 and was lower in interim 2023, at 82.2 percent compared to 86.2 percent in interim 2022. CDMT gross profit fluctuated during the period examined but increased overall from \$86.1 million in 2017 to \$151.2 million in 2022. It was higher in interim 2023, at \$105.3 million, than in interim 2022, at \$103.3 million.

¹⁷ ***. Email from ***.

¹⁸ ***. Email from ***.

SG&A expenses and operating income or loss

U.S. producers' SG&A expenses increased by 28.5 percent from 2017 to 2022 but were lower by 11.9 percent in interim 2023 compared to interim 2022. Half of the U.S. producers (***) reported an overall increase in their SG&A expenses from 2017 to 2022, and the remaining firms reported an overall decrease during the same period. As shown in table III-14, *** company reported lower SG&A expenses in interim 2023 compared to interim 2022. The SG&A expense ratio (SG&A expenses divided by total net sales) decreased irregularly from 5.3 percent in 2017 to 4.2 percent in 2022 but was higher in interim 2023 at 4.3 percent compared to 3.8 percent in interim 2022.^{19 20}

U.S producers' operating income increased overall from \$42.3 million in 2017 to \$95.0 million in 2022 and was higher at \$80.0 million in interim 2023 compared to \$74.5 million in interim 2022. As a ratio to net sales, operating income increased irregularly from 5.1 percent in 2017 to 7.1 percent in 2022 and was higher in interim 2023 at 13.5 percent compared to 10.0 percent in interim 2022. As displayed in table III-14, *** reported overall increases in operating income from 2017 to 2022 while *** reported overall decreases during the same period. While there was quite a bit of variability between the individual firms' directional trends year-to-year, 2020 and 2021 were mostly uniform; *** companies reported a decrease in operating income from 2019 to 2020, and *** reported an increase in operating income from 2020 to 2021. ***'s operating income were higher in interim 2023 compared to interim 2022, while ***'s operating income were lower in interim 2023 compared to interim 2022.²¹

¹⁹ ***. *** U.S. producer questionnaire, section III-10. Email from ***, October 10, 2023.

²⁰ ***. Email from ***, October 10, 2023.

²¹ ***. Email from ***.

All other expenses and net income or loss

Classified below the operating income level are interest expenses, other expenses, and other income. Interest expense, other expenses, and other income are combined in table III-12 and only the net amount is shown. Interest expense represented the majority of the combined category in 2018-20 and interim 2022 and all other expenses represented the majority in the remaining periods. Total net other expenses/income increased overall from \$13.1 million in 2017 to \$16.3 million in 2022 and was lower at \$5.4 million in interim 2023 compared to \$5.8 million in interim 2022.

Net income increased overall from \$29.2 million in 2017 to \$78.6 million in 2022 and was higher in interim 2023 at \$74.6 million compared to \$68.8 million in interim 2022. An overall net loss was reported in 2020. As displayed in table III-14, half of the U.S. producers, (***) , reported an overall increase in net income from 2017 to 2022 while *** reported overall decreases in net income during the same period. Similar to operating income, there was a lot of variability between the individual producers' directional trends year-to-year, however, 2020 and 2021 were mostly similar in terms of directional trends. *** U.S. producers reported a decrease in net income from 2019 to 2020 (***), and *** reported an increase in net income from 2020 to 2021. *** reported higher net income in interim 2023 compared to interim 2022 while *** reported a lower net income in interim 2023 compared to interim 2022.

Variance analysis

A variance analysis for the operations of U.S. producers of CDMT is presented in table III-16.²² The information for this variance analysis is derived from table III-12. The variance analysis shows that the \$52.6 million increase in operating income from 2017 to 2022 was mostly the result of a favorable price variance despite an unfavorable cost variance (i.e., prices increased more than costs). It also shows that the \$5.5 million increase in operating income between the comparable interim periods was mainly the result of a favorable cost variance despite an unfavorable price variance (i.e., costs decreased more than prices).

²² The Commission's variance analysis is calculated in three parts: Sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost or expense variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost/expense variance is calculated as the change in unit price or per-unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or per-unit cost/expense. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances. The overall volume component of the variance analysis is generally small.

Table III-16**CDMT: Variance analysis on the operations of U.S. producers between comparison periods, by item**

Value in 1,000 dollars

Item	2017-22	2017-18	2018-19	2019-20	2020-21	2021-22	Jan-Jun 2022-23
Net sales price variance	535,483	107,892	(8,559)	(74,711)	336,300	203,391	(122,383)
Net sales volume variance	(33,611)	110,745	(136,447)	(175,323)	128,980	9,604	(35,096)
Net sales total variance	501,872	218,637	(145,006)	(250,034)	465,280	212,995	(157,479)
COGS cost variance	(466,913)	(90,000)	(16,130)	62,600	(230,610)	(217,927)	129,258
COGS volume variance	30,137	(99,297)	121,468	160,668	(119,351)	(8,197)	30,251
COGS total variance	(436,776)	(189,297)	105,338	223,268	(349,961)	(226,124)	159,509
Gross profit variance	65,096	29,340	(39,668)	(26,766)	115,319	(13,129)	2,030
SG&A cost variance	(14,243)	(6,456)	2,746	(8,105)	(7,196)	5,590	2,077
SG&A volume variance	1,766	(5,820)	7,273	8,902	(8,886)	(525)	1,348
SG&A total variance	(12,477)	(12,276)	10,019	797	(16,082)	5,065	3,425
Operating income price variance	535,483	107,892	(8,559)	(74,711)	336,300	203,391	(122,383)
Operating income cost variance	(481,156)	(96,455)	(13,384)	54,494	(237,806)	(212,337)	131,335
Operating income volume variance	(1,708)	5,628	(7,706)	(5,753)	743	882	(3,496)
Operating income total variance	52,619	17,064	(29,649)	(25,969)	99,237	(8,064)	5,455

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data are derived from the data in table III-12. Unfavorable variances (which are negative) are shown in parentheses, all others are favorable (positive).

Capital expenditures and research and development expenses

Table III-17 presents capital expenditures, by firm, and table III-19 presents R&D expenses, by firm. Tables III-18 and III-20 present the firms' narrative explanations of the nature, focus, and significance of their capital expenditures and R&D expenses, respectively. Total capital expenditures increased overall from \$26.6 million in 2017 to \$45.0 million in 2022 and were higher at \$22.2 million in interim 2023 compared to \$14.7 million in interim 2022. As shown in table III-17, *** reported the majority of capital expenditures in 2017, 2018, and 2020, whereas *** reported the majority of capital expenditures in 2019 and *** reported the majority in 2021 and 2022.²³ R&D expenses decreased overall from \$*** in 2017 to \$*** in 2022 and were higher at \$*** in interim 2023 compared to \$*** in interim 2022. *** to report R&D expenses.

²³ ***. Email from ***, October 10, 2023.

Table III-17
CDMT: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	26,618	22,495	30,055

Table continued.

Table III-17 Continued
CDMT: U.S. producers' capital expenditures, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	20,351	26,028	44,991	14,745	22,153

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-18
CDMT: U.S. producers' narrative descriptions of their capital expenditures, by firm

Firm	Narrative on capital expenditures
ArcelorMittal	***
Michigan Seamless	***
Nippon Steel	***
PTC Alliance	***
Sharon Tube	***
Webco	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-19
CDMT: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2017	2018	2019
ArcelorMittal	***	***	***
Michigan Seamless	***	***	***
Nippon Steel	***	***	***
PTC Alliance	***	***	***
Sharon Tube	***	***	***
Webco	***	***	***
All firms	***	***	***

Table continued.

Table III-19 Continued
CDMT: U.S. producers' R&D expenses, by firm and period

Value in 1,000 dollars

Firm	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
ArcelorMittal	***	***	***	***	***
Michigan Seamless	***	***	***	***	***
Nippon Steel	***	***	***	***	***
PTC Alliance	***	***	***	***	***
Sharon Tube	***	***	***	***	***
Webco	***	***	***	***	***
All firms	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table III-20
CDMT: U.S. producers' narrative descriptions of their R&D expenses, by firm

Firm	Narrative on R&D expenses
ArcelorMittal	***
Michigan Seamless	***
Nippon Steel	***
PTC Alliance	***
Sharon Tube	***
Webco	***

Source: Compiled from data submitted in response to Commission questionnaires.

Assets and return on assets

Table III-21 presents data on the U.S. producers' total net assets, while table III-22 presents their operating ROA.²⁴ Table III-23 presents U.S. producers' narrative responses explaining their major asset categories and any significant changes in asset levels over time. The industry's total net assets fluctuated but increased overall from 2017 to 2022. Year-to-year, the largest change to net assets was in 2021, when total net assets increased by \$201.9 million. This increase was mainly attributable to ***.²⁵ The industry's operating ROA increased irregularly from 7.1 percent in 2017 to 15.3 percent in 2022.

Table III-21
CDMT: U.S. producers' total net assets, by firm and period

Value in 1,000 dollars

Firm	2017	2018	2019	2020	2021	2022
ArcelorMittal	***	***	***	***	***	***
Michigan Seamless	***	***	***	***	***	***
Nippon Steel	***	***	***	***	***	***
PTC Alliance	***	***	***	***	***	***
Sharon Tube	***	***	***	***	***	***
Webco	***	***	***	***	***	***
All firms	598,597	555,945	462,496	432,437	634,292	619,693

Source: Compiled from data submitted in response to Commission questionnaires.

²⁴ The operating ROA is calculated as operating income divided by total assets. With respect to a firm's overall operations, the total asset value reflects an aggregation of a number of assets which are generally not product specific. Thus, high-level allocations are generally required in order to report a total asset value on a product-specific basis.

²⁵ As shown in table III-23, ***.

Table III-22
CDMT: U.S. producers' ROA, by firm and period

Ratio in percent

Firm	2017	2018	2019	2020	2021	2022
ArcelorMittal	***	***	***	***	***	***
Michigan Seamless	***	***	***	***	***	***
Nippon Steel	***	***	***	***	***	***
PTC Alliance	***	***	***	***	***	***
Sharon Tube	***	***	***	***	***	***
Webco	***	***	***	***	***	***
All firms	7.1	10.7	6.4	0.9	16.2	15.3

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Table III-23
CDMT: U.S. producers' narrative descriptions of their total net assets, by firm

Firm	Narrative on assets
ArcelorMittal	***
Michigan Seamless	***
Nippon Steel	***
PTC Alliance	***
Sharon Tube	***
Webco	***

Source: Compiled from data submitted in response to Commission questionnaires.

Part IV: U.S. imports and the foreign industries

U.S. imports

Overview

The Commission issued U.S. importers' questionnaires to more than 300 firms identified as possible importers of CDMT, as well as to all U.S. producers of CDMT. Twenty-five firms provided data and information in response to the questionnaire, while 88 firms indicated that they had not imported product during the period for which data were collected. Importers' questionnaire data accounted for *** percent of total U.S. imports during 2022 and *** percent of total subject imports during 2022.¹ Firms responding to the Commission's questionnaire accounted for the following shares of individual subject country's subject imports during 2022.

- *** percent of the subject imports from China
- *** percent of the subject imports from Germany
- *** percent of the subject imports from India
- *** percent of the subject imports from Italy
- *** percent of the subject imports from South Korea
- *** percent of the subject imports from Switzerland

In light of the data coverage by the Commission's questionnaires and consistent with the methodology used in the original final investigations, U.S. import data for CDMT presented in this report are based on data submitted in response to Commission questionnaires, as supplemented with additional data compiled from proprietary, Census-edited Customs records for nonresponding U.S. importers,² unless otherwise specified. This Customs supplement adds in U.S. imports reported under HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030³ for those firms that did not provide a questionnaire response (i.e., excluding firms that either

¹ See table I-20 and note for coverage calculations.

² "Responding firms" include the 25 firms which provided usable questionnaire responses and the 88 firms which indicated that they have not imported CDMT into the United States since January 1, 2017.

³ The vast majority of subject merchandise is imported under these eight HTS statistical reporting numbers. However, in some cases subject product could enter under other HTS statistical reporting numbers than listed above. The Commission's U.S. importers' questionnaire gathered data on the quantity of such imports. The following statistical reporting numbers are listed in Commerce's scope definition but are not included in official import statistics in this report: 7306.30.1000 and 7306.50.1000. Staff did not include these numbers because they primarily include out-of-scope products.

completed a questionnaire or certified that they were not an importer of CDMT since January 1, 2017).

Imports from subject and nonsubject countries

Table IV-1 and figure IV-1 present information on U.S. imports of CDMT from China, Germany, India, Italy, South Korea, Switzerland, and all other sources during 2017-22, January-June 2022, and January-June 2023.

By quantity, subject imports accounted for a declining share of total imports from *** percent in 2017 to *** percent in 2019. After 2019, subject imports accounted for an increasing share of total imports from *** percent in 2019 to *** percent in 2022. Subject imports accounted for *** percent of total imports in interim 2022 and *** percent of total imports in interim 2023. Overall, the quantity of subject imports decreased irregularly by *** percent from 2017 to 2022, with most of the decrease occurring from 2017 to 2019, which offset the *** percent increase from 2020 to 2021. Subject imports were *** percent lower in interim 2023 than in interim 2022. The unit value of subject imports fluctuated upward, increasing by *** percent from 2017 to 2022, but was *** percent lower in interim 2023 compared with interim 2022. India accounted for the largest quantity of subject imports in almost all full and interim periods. U.S. imports from India, by quantity, fluctuated, decreasing from 2017 to 2019, increasing from 2019 to 2021, and decreasing in 2022 to a level *** percent higher than in 2017.⁴ The import quantities from all other individual subject countries were lower in 2022 than in 2017. U.S. imports, by quantity, from all individual subject countries, other than China, were lower in interim 2023 compared to interim 2022.

The quantity and value of U.S. imports from nonsubject sources fluctuated during 2017-22, increasing from 2017 to 2018, decreasing from 2018 to 2020, and increasing from 2020 to 2022, for an overall decrease of *** percent, by quantity, and an overall increase of *** percent, by value, during 2017-22. U.S. imports from nonsubject sources were *** percent higher, by quantity, and *** percent lower, by value, in interim 2023 compared with interim 2022. The unit value of imports from nonsubject sources increased irregularly by *** percent during 2017-22, but was *** percent lower in interim 2023 than in interim 2022.

⁴ The domestic interested parties argue that the increase in CDMT imports from India in 2021 corresponds with the temporary revocation of Indian CDMT producer Goodluck from the antidumping duty order from May 10, 2020, through September 10, 2021, as a result of litigation. Domestic prehearing brief, p. 30.

Table IV-1
CDMT: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton

Source	Measure	2017	2018	2019
China	Quantity	***	***	***
Germany	Quantity	***	***	***
India	Quantity	***	***	***
Italy	Quantity	***	***	***
South Korea	Quantity	***	***	***
Switzerland	Quantity	***	***	***
Subject	Quantity	***	***	***
Nonsubject sources	Quantity	***	***	***
All import sources	Quantity	***	***	***
China	Value	***	***	***
Germany	Value	***	***	***
India	Value	***	***	***
Italy	Value	***	***	***
South Korea	Value	***	***	***
Switzerland	Value	***	***	***
Subject	Value	***	***	***
Nonsubject sources	Value	***	***	***
All import sources	Value	***	***	***
China	Unit value	***	***	***
Germany	Unit value	***	***	***
India	Unit value	***	***	***
Italy	Unit value	***	***	***
South Korea	Unit value	***	***	***
Switzerland	Unit value	***	***	***
Subject	Unit value	***	***	***
Nonsubject sources	Unit value	***	***	***
All import sources	Unit value	***	***	***

Table continued.

Table IV-1 Continued
CDMT: U.S. imports by source and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; share and ratio in percent; ratio represent the ratio to U.S. production

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Quantity	***	***	***	***	***
Germany	Quantity	***	***	***	***	***
India	Quantity	***	***	***	***	***
Italy	Quantity	***	***	***	***	***
South Korea	Quantity	***	***	***	***	***
Switzerland	Quantity	***	***	***	***	***
Subject	Quantity	***	***	***	***	***
Nonsubject sources	Quantity	***	***	***	***	***
All import sources	Quantity	***	***	***	***	***
China	Value	***	***	***	***	***
Germany	Value	***	***	***	***	***
India	Value	***	***	***	***	***
Italy	Value	***	***	***	***	***
South Korea	Value	***	***	***	***	***
Switzerland	Value	***	***	***	***	***
Subject	Value	***	***	***	***	***
Nonsubject sources	Value	***	***	***	***	***
All import sources	Value	***	***	***	***	***
China	Unit value	***	***	***	***	***
Germany	Unit value	***	***	***	***	***
India	Unit value	***	***	***	***	***
Italy	Unit value	***	***	***	***	***
South Korea	Unit value	***	***	***	***	***
Switzerland	Unit value	***	***	***	***	***
Subject	Unit value	***	***	***	***	***
Nonsubject sources	Unit value	***	***	***	***	***
All import sources	Unit value	***	***	***	***	***

Table continued.

Table IV-1 Continued
CDMT: U.S. imports by source and period

Share and ratio in percent; ratio represent the ratio to U.S. production

Source	Measure	2017	2018	2019
China	Share of quantity	***	***	***
Germany	Share of quantity	***	***	***
India	Share of quantity	***	***	***
Italy	Share of quantity	***	***	***
South Korea	Share of quantity	***	***	***
Switzerland	Share of quantity	***	***	***
Subject	Share of quantity	***	***	***
Nonsubject sources	Share of quantity	***	***	***
All import sources	Share of quantity	***	***	***
China	Share of value	***	***	***
Germany	Share of value	***	***	***
India	Share of value	***	***	***
Italy	Share of value	***	***	***
South Korea	Share of value	***	***	***
Switzerland	Share of value	***	***	***
Subject	Share of value	***	***	***
Nonsubject sources	Share of value	***	***	***
All import sources	Share of value	***	***	***
China	Ratio	***	***	***
Germany	Ratio	***	***	***
India	Ratio	***	***	***
Italy	Ratio	***	***	***
South Korea	Ratio	***	***	***
Switzerland	Ratio	***	***	***
Subject	Ratio	***	***	***
Nonsubject sources	Ratio	***	***	***
All import sources	Ratio	***	***	***

Table continued.

Table IV-1 Continued
CDMT: U.S. imports by source and period

Share and ratio in percent; ratio represent the ratio to U.S. production

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
China	Share of quantity	***	***	***	***	***
Germany	Share of quantity	***	***	***	***	***
India	Share of quantity	***	***	***	***	***
Italy	Share of quantity	***	***	***	***	***
South Korea	Share of quantity	***	***	***	***	***
Switzerland	Share of quantity	***	***	***	***	***
Subject	Share of quantity	***	***	***	***	***
Nonsubject sources	Share of quantity	***	***	***	***	***
All import sources	Share of quantity	***	***	***	***	***
China	Share of value	***	***	***	***	***
Germany	Share of value	***	***	***	***	***
India	Share of value	***	***	***	***	***
Italy	Share of value	***	***	***	***	***
South Korea	Share of value	***	***	***	***	***
Switzerland	Share of value	***	***	***	***	***
Subject	Share of value	***	***	***	***	***
Nonsubject sources	Share of value	***	***	***	***	***
All import sources	Share of value	***	***	***	***	***
China	Ratio	***	***	***	***	***
Germany	Ratio	***	***	***	***	***
India	Ratio	***	***	***	***	***
Italy	Ratio	***	***	***	***	***
South Korea	Ratio	***	***	***	***	***
Switzerland	Ratio	***	***	***	***	***
Subject	Ratio	***	***	***	***	***
Nonsubject sources	Ratio	***	***	***	***	***
All import sources	Ratio	***	***	***	***	***

Table continued.

Table IV-1 Continued
CDMT: U.S. imports by source and period

Change in percent

Source	Measure	2017-22	2017-18	2018-19	2019-20	2020-21	2021-22	Jan-Jun 2022-23
China	%Δ Quantity	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Germany	%Δ Quantity	▼***	▼***	▼***	▼***	▲***	▲***	▼***
India	%Δ Quantity	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Italy	%Δ Quantity	▼***	▼***	▼***	▼***	▲***	▲***	▼***
South Korea	%Δ Quantity	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Switzerland	%Δ Quantity	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Subject sources	%Δ Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
Nonsubject sources	%Δ Quantity	▼***	▲***	▼***	▼***	▲***	▲***	▲***
All import sources	%Δ Quantity	▼***	▼***	▼***	▼***	▲***	▼***	▼***
China	%Δ Value	▼***	▼***	▼***	▼***	▲***	▲***	▲***
Germany	%Δ Value	▼***	▼***	▼***	▼***	▲***	▲***	▼***
India	%Δ Value	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Italy	%Δ Value	▼***	▼***	▼***	▼***	▲***	▲***	▲***
South Korea	%Δ Value	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Switzerland	%Δ Value	▼***	▼***	▼***	▼***	▼***	▼***	▼***
Subject sources	%Δ Value	▼***	▼***	▼***	▼***	▲***	▲***	▼***
Nonsubject sources	%Δ Value	▲***	▲***	▼***	▼***	▲***	▲***	▼***
All import sources	%Δ Value	▼***	▼***	▼***	▼***	▲***	▲***	▼***
China	%Δ Unit value	▲***	▲***	▲***	▼***	▲***	▲***	▲***
Germany	%Δ Unit value	▲***	▲***	▲***	▲***	▲***	▲***	▲***
India	%Δ Unit value	▲***	▲***	▲***	▼***	▲***	▲***	▼***
Italy	%Δ Unit value	▲***	▲***	▼***	▲***	▼***	▲***	▲***
South Korea	%Δ Unit value	▲***	▲***	▼***	▲***	▲***	▲***	▲***
Switzerland	%Δ Unit value	▲***	▼***	▲***	▼***	▲***	▲***	▲***
Subject sources	%Δ Unit value	▲***	▲***	▲***	▼***	▲***	▲***	▼***
Nonsubject sources	%Δ Unit value	▲***	▲***	▲***	▼***	▲***	▲***	▼***
All import sources	%Δ Unit value	▲***	▲***	▲***	▼***	▲***	▲***	▼***

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-1
CDMT: U.S. import quantities and average unit values, by source and by period

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Table IV-2 presents U.S. imports of items under HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, which includes out-of-scope merchandise, from leading nonsubject sources, primarily Mexico, Canada, Japan, and Spain, based on official U.S. Department of Commerce import statistics. Collectively, Canada and Mexico accounted for approximately one-third to one-half of all U.S. imports of CDMT from nonsubject countries in each full and interim period since 2017. Imports from Mexico were 94.0 percent higher in 2022 than in 2017, and 106.6 percent higher in interim 2023 compared with interim 2022, whereas imports from Canada were lower. Imports from all nonsubject sources decreased overall from 2017 to 2022 but were higher in interim 2023 than in interim 2022.

Table IV-2
CDMT: U.S. imports from nonsubject countries, by source and by period

Quantity in short tons; share in percent

Source	Measure	2017	2018	2019
Canada	Quantity	5,988	4,471	4,030
Japan	Quantity	7,118	4,923	4,614
Mexico	Quantity	6,036	9,502	9,664
Spain	Quantity	1,360	1,682	4,364
All other nonsubject sources	Quantity	14,930	20,023	15,283
Nonsubject sources	Quantity	35,431	40,602	37,955
Canada	Share	4.0	4.1	4.9
Japan	Share	4.8	4.5	5.6
Mexico	Share	4.0	8.6	11.6
Spain	Share	0.9	1.5	5.3
All other nonsubject sources	Share	10.0	18.2	18.4
Nonsubject sources	Share	23.8	36.9	45.7

Table continued.

Table IV-2 Continued
CDMT: U.S. imports from nonsubject countries, by source and by period

Quantity in short tons; share in percent

Source	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Canada	Quantity	3,857	3,738	4,407	2,358	1,464
Japan	Quantity	3,771	4,986	3,344	2,403	929
Mexico	Quantity	6,980	7,566	11,709	4,452	9,196
Spain	Quantity	1,721	2,064	2,740	1,450	951
All other nonsubject sources	Quantity	7,884	11,439	11,346	5,888	5,222
Nonsubject sources	Quantity	24,214	29,793	33,547	16,551	17,762
Canada	Share	7.2	4.2	4.7	4.8	3.5
Japan	Share	7.0	5.6	3.6	4.8	2.2
Mexico	Share	13.0	8.5	12.6	9.0	22.1
Spain	Share	3.2	2.3	2.9	2.9	2.3
All other nonsubject sources	Share	14.7	12.8	12.2	11.9	12.5
Nonsubject sources	Share	45.0	33.3	36.0	33.4	42.6

Source: Compiled from official U.S. imports statistics of the U.S. Department of Commerce using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 accessed October 24, 2023. Imports are based on the imports for consumption data series.

Note: Percentages shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Shares show the share of nonsubject imports out of imports from all sources. As these data and calculations are based on unadjusted official U.S. import statistics, the shares do not correspond with subject import data provided in table IV-1, but they can nonetheless provide an indication of the relative size of nonsubject sources relative to other import sources. The data presented in this table represent all import data reported under the relevant HTS provisions using official U.S. Department of Commerce import statistics and is not limited to the volumes reported in questionnaire submissions (which were not disaggregated by nonsubject source) and is not supplemented with proprietary Census-edited Customs records.

The Commission asked importers to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm’s supply chain arrangements, importation, employment, and shipments relating to CDMT. Table IV-3 presents the firms’ responses to this question.

Table IV-3
CDMT: Impact of COVID-19 on U.S. importers’ operations, by firm

Firm	Narrative on COVID-19 impact on operations
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Cumulation considerations

In assessing whether U.S. imports from the subject countries are likely to compete with each other and with the domestic like product, the Commission has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

Fungibility

Table IV-4 and figure IV-2 present data on U.S. producers' and U.S. importers' U.S. shipments of CDMT by end use in 2022. The majority of U.S. producers' reported shipments of end use types of CDMT in 2022 were automotive and industrial machinery, together accounting for 75.8 percent of their total U.S. shipments, followed by agriculture, which accounted for 14.9 percent of their total U.S. shipments. The largest share of end use types reported by U.S. importers from subject countries were "other" end use types,⁵ accounting for *** percent of their total U.S. shipments, followed by automotive and industrial machinery, together accounting for *** percent of their total U.S. shipments. Overall, U.S. producers accounted for the vast majority of total shipments of each end use type of CDMT in 2022.

Table IV-5 and figure IV-3 present data on U.S. producers' and U.S. importers' U.S. shipments of CDMT by product type in 2022. The overwhelming majority of U.S. producers' U.S. shipments of CDMT in 2022 were of carbon steel welded pipe, as were the majority of U.S. shipments of imports from India, South Korea, and Switzerland. The overwhelming majority of U.S. shipments of CDMT imports from China, Germany, and Italy in 2022 were of carbon steel seamless pipe. Overall, U.S. producers accounted for the majority of total shipments of each pipe type of CDMT in 2022.

⁵ Most subject U.S. importers (primarily from India and China) reported that these "other" end use types were actually "unknown" end use types, although one subject U.S. importer identified its "other" end use type as hydraulic and pneumatic cylinders and their components.

Table IV-4
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and end use sector, 2022

Quantity in short tons

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses/sectors	All sectors
U.S. producers	56,691	152,009	135,331	16,525	18,816	379,372
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

Table IV-4 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and end use sector, 2022

Share across in percent

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses/sectors	All sectors
U.S. producers	14.9	40.1	35.7	4.4	5.0	100.0
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Table continued.

Table IV-4 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and end use sector, 2022

Share down in percent

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses/sectors	All sectors
U.S. producers	***	***	***	***	***	***
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All imports	***	***	***	***	***	***
All sources	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “--”.

Figure IV-2
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by end use sector, 2022

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-5
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by source and type of pipe, 2022

Quantity in short tons

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-5 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by type of pipe, 2022

Share across in percent

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports	***	***	***	***	***
All sources	***	***	***	***	***

Table continued.

Table IV-5 Continued
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by type of pipe, 2022

Share down in percent

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
U.S. producers	***	***	***	***	***
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports	***	***	***	***	***
All sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023.

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “--”.

Figure IV-3
CDMT: U.S. producers' and U.S. importers' U.S. shipments, by type of pipe, 2022

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Geographical markets

CDMT produced in the United States is shipped nationwide (see part II for more information on geographic markets). U.S. imports from China, Germany, India, Italy, Korea, and Switzerland under HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 entered multiple U.S. ports of entry across the nation. Table IV-6 presents data on U.S. imports under these numbers, by source and by border of entry in 2022, based on official import statistics. During 2022, the largest share of imports under these HTS numbers from China, India, South Korea, and Switzerland entered the United States via the North, while the largest share of imports from Germany entered via the East and the largest share of imports from Italy entered via the South.⁶

Table IV-6
CDMT: U.S. imports in 2022, by source and border of entry

Quantity in short tons

Source	East	North	South	West	All borders
China	893	2,216	2,086	244	5,439
Germany	4,207	2,686	984	625	8,501
India	2,244	34,777	1,964	1,227	40,212
Italy	722	97	1,183	27	2,029
South Korea	0	848	0	1,229	2,077
Switzerland	399	1,005	3	0	1,408
Subject sources	8,465	41,629	6,220	3,353	59,667
Nonsubject sources	5,201	10,420	15,998	1,927	33,547
All import sources	13,666	52,050	22,218	5,280	93,213

Table continued.

⁶ The Italian interested parties explained that ***. Italian respondents' prehearing brief, p. 16.

Table IV-6 Continued
CDMT: U.S. imports in 2022, by source and border of entry

Share across in percent

Source	East	North	South	West	All borders
China	16.4	40.7	38.4	4.5	100.0
Germany	49.5	31.6	11.6	7.4	100.0
India	5.6	86.5	4.9	3.1	100.0
Italy	35.6	4.8	58.3	1.4	100.0
South Korea	0.0	40.8	0.0	59.2	100.0
Switzerland	28.4	71.4	0.2	0.0	100.0
Subject sources	14.2	69.8	10.4	5.6	100.0
Nonsubject sources	15.5	31.1	47.7	5.7	100.0
All import sources	14.7	55.8	23.8	5.7	100.0

Table continued.

Table IV-6 Continued
CDMT: U.S. imports in 2022, by source and border of entry

Share down in percent

Source	East	North	South	West	All borders
China	6.5	4.3	9.4	4.6	5.8
Germany	30.8	5.2	4.4	11.8	9.1
India	16.4	66.8	8.8	23.2	43.1
Italy	5.3	0.2	5.3	0.5	2.2
South Korea	0.0	1.6	0.0	23.3	2.2
Switzerland	2.9	1.9	0.0	0.0	1.5
Subject sources	61.9	80.0	28.0	63.5	64.0
Nonsubject sources	38.1	20.0	72.0	36.5	36.0
All import sources	100.0	100.0	100.0	100.0	100.0

Source: Official U.S. import statistics using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed August 14, 2023.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Presence in the market

CDMT produced in the United States was present in the market throughout the period for which data were collected. Table IV-7 and figures IV-4 and IV-5 present monthly data for U.S. imports from subject and nonsubject sources during January 2017-June 2023 under the primary HTS statistical reporting numbers for CDMT. Based on official import statistics, U.S. imports under these HTS numbers from China, Germany, India, and Italy were present in each month during January 2017-June 2023. U.S. imports from South Korea were present in every month, except December 2018 and February 2023, and U.S. imports from Switzerland were present in every month, except June 2023.

Table IV-7
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	China	Germany	India	Italy	South Korea	Switzerland
2017	January	2,031	2,401	2,832	587	851	839
2017	February	1,763	2,276	2,590	322	785	740
2017	March	1,975	1,597	2,511	640	1,005	695
2017	April	2,308	2,572	2,176	308	1,133	1,112
2017	May	2,861	2,404	2,945	610	1,244	1,021
2017	June	3,351	1,983	3,411	872	935	925
2017	July	3,400	2,131	3,507	629	1,097	939
2017	August	4,247	2,498	1,653	760	1,246	952
2017	September	1,584	2,111	2,654	453	988	833
2017	October	1,068	2,449	2,975	289	808	882
2017	November	1,258	1,290	2,622	630	617	785
2017	December	1,318	1,406	3,442	269	708	600
2018	January	1,368	1,230	2,369	387	745	1,424
2018	February	681	1,474	1,292	542	886	1,200
2018	March	869	1,810	1,639	459	1,384	1,192
2018	April	416	1,798	1,127	457	980	1,743
2018	May	501	1,231	1,569	258	397	1,587
2018	June	443	1,309	957	271	1,324	1,452
2018	July	485	1,750	977	313	113	1,527
2018	August	409	1,320	1,861	294	41	976
2018	September	312	1,176	1,501	100	20	1,356
2018	October	315	1,218	2,648	199	20	1,412
2018	November	561	957	2,190	142	22	1,008
2018	December	422	1,477	1,954	558	0	1,086

Table continued.

Table IV-7 Continued
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	China	Germany	India	Italy	South Korea	Switzerland
2019	January	406	1,655	1,694	279	296	1,043
2019	February	400	1,021	1,433	131	229	1,044
2019	March	304	1,413	1,355	420	107	1,086
2019	April	189	1,212	928	232	305	841
2019	May	260	1,273	1,718	266	163	782
2019	June	312	975	1,674	9	373	975
2019	July	356	933	1,441	111	61	792
2019	August	328	894	1,294	126	272	914
2019	September	151	725	818	43	132	894
2019	October	436	768	728	4	139	664
2019	November	137	724	1,037	122	250	578
2019	December	229	641	412	85	396	656
2020	January	781	594	619	174	114	277
2020	February	131	757	998	51	181	504
2020	March	106	941	825	183	244	495
2020	April	199	747	842	55	338	602
2020	May	293	313	103	24	49	168
2020	June	122	507	595	77	67	23
2020	July	286	393	769	23	189	45
2020	August	189	596	1,113	67	79	365
2020	September	111	711	1,521	93	25	421
2020	October	118	844	1,184	18	116	704
2020	November	208	657	1,133	138	96	720
2020	December	207	713	1,534	281	266	515

Table continued.

Table IV-7 Continued
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	China	Germany	India	Italy	South Korea	Switzerland
2021	January	199	550	1,770	70	62	414
2021	February	212	621	1,477	24	202	536
2021	March	317	855	3,218	142	125	419
2021	April	240	792	2,226	85	108	225
2021	May	117	694	4,571	106	174	237
2021	June	120	772	4,096	132	239	195
2021	July	234	752	3,497	101	65	325
2021	August	325	615	4,634	148	67	155
2021	September	185	1,140	4,159	84	70	186
2021	October	213	830	3,945	164	43	90
2021	November	159	794	2,705	13	19	120
2021	December	357	973	5,627	115	141	153
2022	January	158	471	5,522	291	128	62
2022	February	162	957	3,800	95	215	126
2022	March	329	945	4,607	79	141	41
2022	April	252	708	3,725	212	373	153
2022	May	437	1,013	2,772	91	200	148
2022	June	481	385	3,431	140	201	148
2022	July	461	680	2,155	123	97	179
2022	August	457	553	3,239	114	113	103
2022	September	791	484	3,326	196	237	221
2022	October	640	927	3,712	243	183	81
2022	November	793	691	1,396	106	81	64
2022	December	478	687	2,528	339	107	81
2023	January	765	236	2,388	344	6	143
2023	February	286	563	1,775	502	0	44
2023	March	396	313	1,733	255	71	50
2023	April	195	495	2,796	207	86	21
2023	May	450	579	3,954	163	94	77
2023	June	329	355	4,142	92	1	0

Table continued.

Table IV-7
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2017	January	9,541	3,465	13,005
2017	February	8,475	2,890	11,365
2017	March	8,423	3,319	11,742
2017	April	9,610	2,733	12,343
2017	May	11,085	2,942	14,027
2017	June	11,478	2,505	13,983
2017	July	11,702	2,573	14,275
2017	August	11,357	3,091	14,447
2017	September	8,623	2,661	11,284
2017	October	8,472	3,123	11,595
2017	November	7,201	3,135	10,337
2017	December	7,743	2,995	10,738
2018	January	7,523	3,150	10,673
2018	February	6,075	3,035	9,110
2018	March	7,353	4,120	11,473
2018	April	6,519	3,210	9,729
2018	May	5,542	3,383	8,925
2018	June	5,756	2,264	8,020
2018	July	5,165	4,154	9,319
2018	August	4,901	3,349	8,250
2018	September	4,465	2,938	7,402
2018	October	5,813	3,731	9,544
2018	November	4,879	4,024	8,904
2018	December	5,496	3,245	8,742

Table continued.

Table IV-7 Continued
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2019	January	5,372	4,424	9,797
2019	February	4,259	3,314	7,573
2019	March	4,684	3,194	7,878
2019	April	3,707	3,148	6,854
2019	May	4,462	3,270	7,732
2019	June	4,319	2,839	7,158
2019	July	3,695	3,120	6,814
2019	August	3,830	2,994	6,824
2019	September	2,763	2,205	4,968
2019	October	2,740	2,849	5,589
2019	November	2,848	3,886	6,735
2019	December	2,418	2,712	5,130
2020	January	2,559	2,908	5,468
2020	February	2,622	2,918	5,539
2020	March	2,794	2,605	5,399
2020	April	2,783	1,696	4,479
2020	May	950	1,652	2,602
2020	June	1,390	1,874	3,264
2020	July	1,706	1,406	3,111
2020	August	2,409	1,794	4,203
2020	September	2,882	1,319	4,201
2020	October	2,985	1,704	4,689
2020	November	2,952	2,175	5,128
2020	December	3,515	2,163	5,678

Table continued.

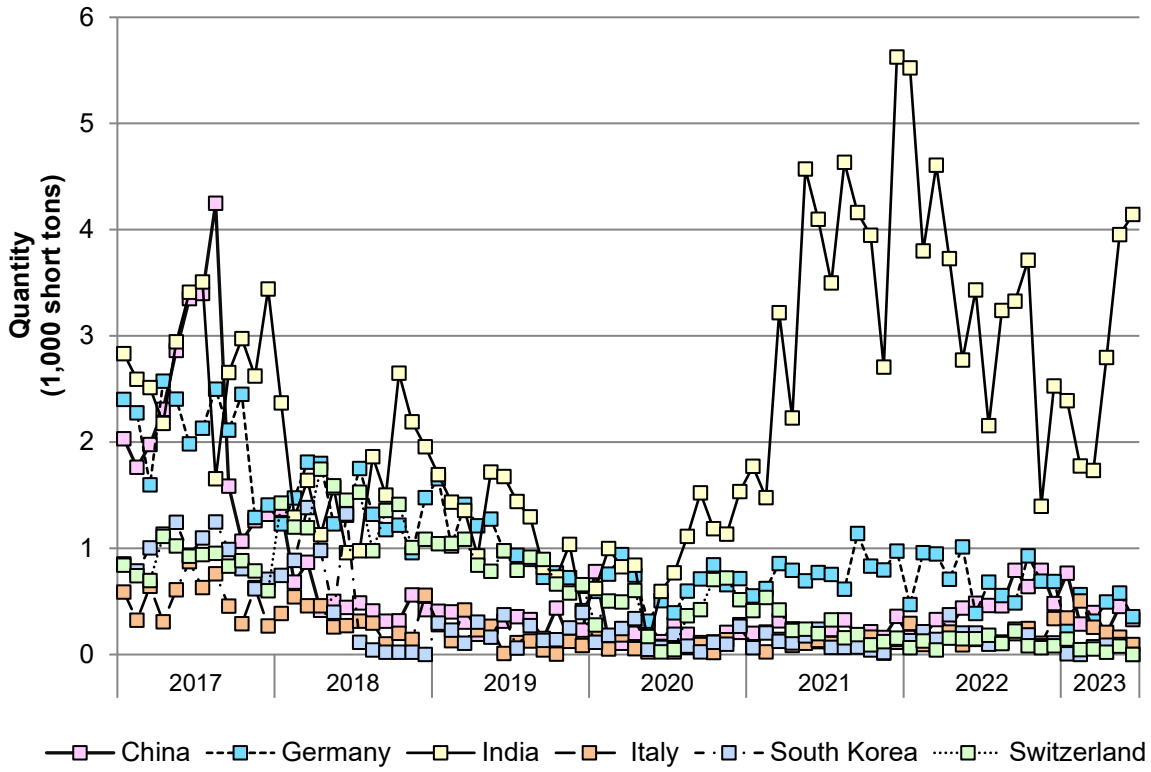
Table IV-7 Continued
CDMT: U.S. imports, by source and by month

Quantity in short tons

Year	Month	Subject sources	Nonsubject sources	All import sources
2021	January	3,066	1,846	4,912
2021	February	3,072	1,927	4,999
2021	March	5,075	2,600	7,675
2021	April	3,676	2,820	6,496
2021	May	5,900	1,928	7,828
2021	June	5,555	2,849	8,403
2021	July	4,975	2,834	7,809
2021	August	5,943	3,245	9,188
2021	September	5,823	2,352	8,176
2021	October	5,286	2,185	7,470
2021	November	3,811	2,686	6,497
2021	December	7,366	2,521	9,886
2022	January	6,633	2,998	9,631
2022	February	5,354	2,130	7,484
2022	March	6,142	3,455	9,597
2022	April	5,424	2,371	7,795
2022	May	4,661	3,045	7,706
2022	June	4,786	2,552	7,338
2022	July	3,696	3,221	6,917
2022	August	4,579	2,520	7,100
2022	September	5,255	2,953	8,209
2022	October	5,785	4,070	9,855
2022	November	3,132	2,292	5,424
2022	December	4,218	1,939	6,157
2023	January	3,883	3,514	7,397
2023	February	3,171	2,761	5,931
2023	March	2,818	3,021	5,839
2023	April	3,800	3,175	6,975
2023	May	5,318	2,074	7,391
2023	June	4,919	3,218	8,137

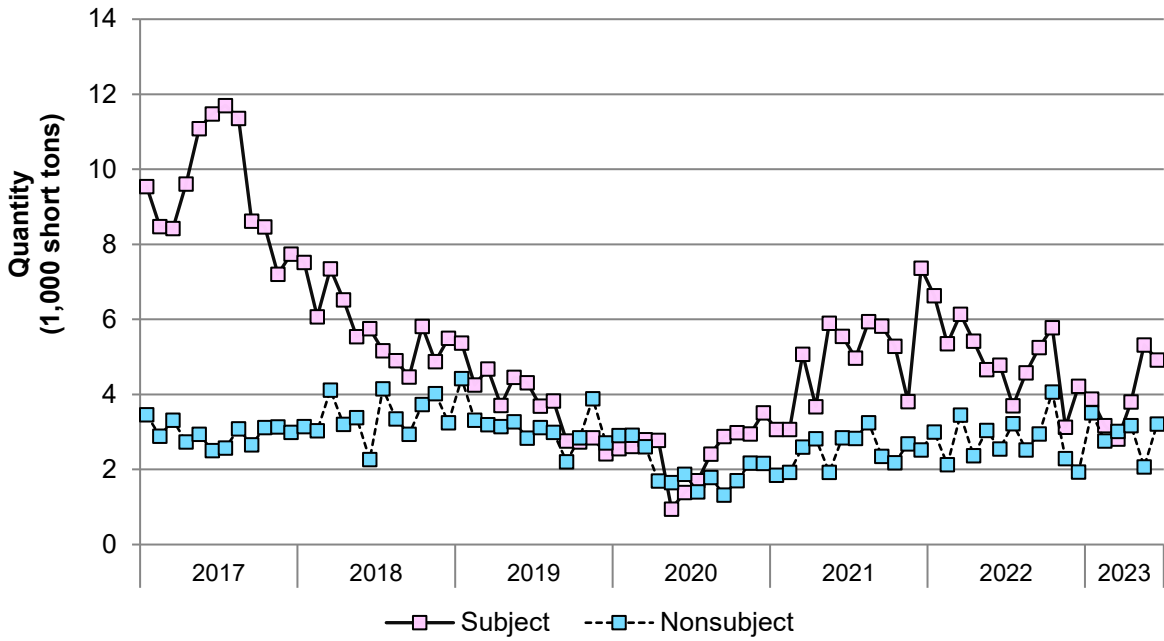
Source: Official U.S. import statistics using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed August 14, 2023.

Figure IV-4
CDMT: U.S. imports from individual subject sources, by month, January 2017 through June 2023



Source: Official U.S. import statistics using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed August 14, 2023.

Figure IV-5
CDMT: U.S. imports from aggregated subject and nonsubject sources, by month, January 2017 through June 2023



Source: Official U.S. import statistics using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed August 14, 2023.

U.S. inventories of imported merchandise

Table IV-8 presents data for inventories of U.S. imports of CDMT from China, Germany, India, Italy, South Korea, Switzerland, and all other sources held in the United States.

Imports from subject sources accounted for *** of responding U.S. importers' end-of-period inventories during 2017-22 and interim 2023. Overall, end-of-period inventories of subject U.S. imports decreased by *** percent from 2017 to 2022, with most of the decrease occurring from 2018 to 2020, as subject imports declined at its highest rate between those years. End-of-period inventories were *** percent higher in interim 2023 compared with interim 2022.⁷ Switzerland accounted for the largest share (*** percent) of reported inventories of U.S. imports from subject countries during 2022, followed by China (*** percent), and India (*** percent).

End-of-period inventories of nonsubject imports, which accounted for *** percent of all import inventories in 2022, increased overall by *** percent from 2017 to 2022. The largest increase, of *** percent, occurred from 2017 to 2018. End-of-period inventories of CDMT from nonsubject sources were *** percent higher in interim 2023 compared with interim 2022.⁸

⁷ Of the responding U.S. importers, *** held the largest amounts of U.S. inventories of CDMT imports.

⁸ ***.

Table IV-8
CDMT: U.S. importers' end-of-period inventories of imports, by source and by period

Quantity in short tons; ratio in percent

Measure	Source	2017	2018	2019
Inventories quantity	China	***	***	***
Ratio to imports	China	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***
Ratio to total shipments of imports	China	***	***	***
Inventories quantity	Germany	***	***	***
Ratio to imports	Germany	***	***	***
Ratio to U.S. shipments of imports	Germany	***	***	***
Ratio to total shipments of imports	Germany	***	***	***
Inventories quantity	India	***	***	***
Ratio to imports	India	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***
Ratio to total shipments of imports	India	***	***	***
Inventories quantity	Italy	***	***	***
Ratio to imports	Italy	***	***	***
Ratio to U.S. shipments of imports	Italy	***	***	***
Ratio to total shipments of imports	Italy	***	***	***
Inventories quantity	South Korea	***	***	***
Ratio to imports	South Korea	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***
Inventories quantity	Switzerland	***	***	***
Ratio to imports	Switzerland	***	***	***
Ratio to U.S. shipments of imports	Switzerland	***	***	***
Ratio to total shipments of imports	Switzerland	***	***	***
Inventories quantity	Subject	***	***	***
Ratio to imports	Subject	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***
Ratio to total shipments of imports	Subject	***	***	***
Inventories quantity	Nonsubject	***	***	***
Ratio to imports	Nonsubject	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***
Inventories quantity	All	***	***	***
Ratio to imports	All	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***
Ratio to total shipments of imports	All	***	***	***

Table continued.

Table IV-8 Continued
CDMT: U.S. importers' end-of-period inventories of imports, by source and by period

Quantity in short tons; ratio in percent

Measure	Source	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Inventories quantity	China	***	***	***	***	***
Ratio to imports	China	***	***	***	***	***
Ratio to U.S. shipments of imports	China	***	***	***	***	***
Ratio to total shipments of imports	China	***	***	***	***	***
Inventories quantity	Germany	***	***	***	***	***
Ratio to imports	Germany	***	***	***	***	***
Ratio to U.S. shipments of imports	Germany	***	***	***	***	***
Ratio to total shipments of imports	Germany	***	***	***	***	***
Inventories quantity	India	***	***	***	***	***
Ratio to imports	India	***	***	***	***	***
Ratio to U.S. shipments of imports	India	***	***	***	***	***
Ratio to total shipments of imports	India	***	***	***	***	***
Inventories quantity	Italy	***	***	***	***	***
Ratio to imports	Italy	***	***	***	***	***
Ratio to U.S. shipments of imports	Italy	***	***	***	***	***
Ratio to total shipments of imports	Italy	***	***	***	***	***
Inventories quantity	South Korea	***	***	***	***	***
Ratio to imports	South Korea	***	***	***	***	***
Ratio to U.S. shipments of imports	South Korea	***	***	***	***	***
Ratio to total shipments of imports	South Korea	***	***	***	***	***
Inventories quantity	Switzerland	***	***	***	***	***
Ratio to imports	Switzerland	***	***	***	***	***
Ratio to U.S. shipments of imports	Switzerland	***	***	***	***	***
Ratio to total shipments of imports	Switzerland	***	***	***	***	***
Inventories quantity	Subject	***	***	***	***	***
Ratio to imports	Subject	***	***	***	***	***
Ratio to U.S. shipments of imports	Subject	***	***	***	***	***
Ratio to total shipments of imports	Subject	***	***	***	***	***
Inventories quantity	Nonsubject	***	***	***	***	***
Ratio to imports	Nonsubject	***	***	***	***	***
Ratio to U.S. shipments of imports	Nonsubject	***	***	***	***	***
Ratio to total shipments of imports	Nonsubject	***	***	***	***	***
Inventories quantity	All	***	***	***	***	***
Ratio to imports	All	***	***	***	***	***
Ratio to U.S. shipments of imports	All	***	***	***	***	***
Ratio to total shipments of imports	All	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

U.S. importers' imports subsequent to June 30, 2023

The Commission requested that importers indicate whether they had imported or arranged for the importation of CDMT from China, Germany, India, Italy, South Korea, Switzerland, and nonsubject sources for delivery after June 30, 2023. Table IV-9 presents U.S. importers' arranged imports after June 2023.

There are *** arranged imports from responding U.S. importers from Switzerland, and *** arranged imports from China, Italy, and South Korea. The majority of arranged imports from subject sources are from ***.

Table IV-9
CDMT: Arranged imports, by source and projected quarter

Quantity in short tons

Source	Jul-Sep 2023	Oct-Dec 2023	Jan-Mar 2024	Apr-Jun 2024	Total
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

The industry in China

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from five firms, which accounted for approximately *** percent of production of CDMT in China during 2016, and whose exports to the United States accounted for approximately *** percent of U.S. imports from China during 2016.⁹

The domestic interested parties provided a list of 53 firms that are believed to be producers of CDMT in China.¹⁰ The Commission identified an additional 18 firms through staff research and proprietary, Census edited Customs' import records that are also believed to be producers of CDMT in China. In these full first five-year reviews, the Commission issued a foreign producer questionnaire to 51 of the identified 71 firms for which valid contact information was identified and received responses from 3 firms. Two firms (Jiangsu Hongyi Steel Pipe Co., Ltd. and Modern Heavy Industries (Taicang) Co., Ltd.) certified that they ***, and the third firm (Marcegaglia China) indicated that it would not complete the Commission's questionnaire as its CDMT production facility in China, ***. Marcegaglia China is estimated to have accounted for *** percent of CDMT production in China and *** percent of U.S. imports from China during 2016.¹¹

⁹ The five responding firms are Changshu Fushilai Steel Pipe Co., Ltd., Changshu Special Shaped Steel Tube Co., Ltd. , Marcegaglia China, Wuxi Huijin International Trade Co., Ltd., and Zhejiang Dingxin Steel Tube Manufacturing Co., Ltd. Original confidential report, p. VII-3.

¹⁰ Domestic interested parties' response to the notice of institution, February 2, 2023, exh. 1.

¹¹ Calculated from original confidential report, p. VII-3, table IV-2, and table VII-1.

Developments in the industry

Table IV-10 presents events in the CDMT industry in China since the Commission's original investigations.

Table IV-10
CDMT: Developments in the industry in China since January 1, 2017

Item	Firm	Event
Acquisition	Hongyi	2017: Jiangsu Hongyi Precision Co. Ltd. ("Hongyi") developed the recently acquired former Ocean Steel Pipe Factory into a production and finishing facility, designated as its "No. 3 Factory."
New producer	Hongbao High-Precise Pipe & Tube	August 2017: The Jiangsu Hongbao Industry Group established its subsidiary Jiangsu Hongbao High-Precise Pipe & Tube Co. Ltd. to produce seamless steel pipe, high precision welded pipe, alloy steel pipe for the automotive industry; and thin-wall pipe for refrigerator condensers.
New equipment	Raymond	November 2017: Changzhou Raymond Steel Tube Co. Ltd. ("Raymond") installed four new sets of fully automated production machines in 2017, for a total of 40 hot-rolling and cold-drawing machines at the end of this year compared to the three original machines when the firm was founded in 2002.
New equipment and production line	Changbao	March 2019: SMS Group announced that Jiangsu Changbao Steel Tube Limited Co. Ltd. ("Changbao") placed an order for its state-of-the-art Premium Quality Finish ("PQF") [®] seamless steel tube production line and related automation of the machinery, along with state-of-the-art laser technology for measuring the wall thicknesses of downstream from the production line and the stretch reducing mill. The new seamless steel tube line, anticipated to be commissioned in first-quarter 2020, will have an annual production capacity of 300,000 metric tons (330,693 short tons).
Bankruptcy and acquisition	Gross Seamless Steel Tube/Daye	May 2019: Daye Special Steel Co. Ltd. ("Daye") will reportedly invest CN¥491.55 million to gain full ownership of reorganized bankrupt Zhejiang Gross Seamless Steel Tube Co. Ltd. ("Gross Seamless Steel Tube").
New producer	Hongda	July 2019: Hengyang Hongda Special Steel Tube Co. Ltd. ("Hongda") broke ground on a new seamless carbon and alloy steel pipe facility. Annual production capacities are reportedly 30,000 metric tons (33,069 short tons) of small-diameter seamless pipe and 30,000 metric tons (33,069 short tons) of precision-rolled steel pipe.
Name change	Daye	September 2019: Daye, a subsidiary of CITIC Group Corp. Ltd., announced its corporate full name change to "CITIC Pacific Special Steel Group Co. Ltd."
Dismissed litigation	Chengde	January 2020: The Fourteenth Court of Appeals upheld the dismissal by the 189th District Court in Harris County, Texas, that Continental Alloys & Services (Delaware) LLC and Continental Alloys & Services Inc. failed to prove their case of being sold faulty steel pipe by distributor CIEC USA Inc. and manufacturer Yangzhou Chengde Steel Pipe Co. Ltd. ("Chengde").
Acquisition	TPCO	January 2021: Shanghai Electric (Group) Corp's. 40-percent ownership share of Tianjin Steel Pipe Corp's. ("TPCO") parent firm was acquired by CITIC Special Steel Co. Ltd.

Table continued.

Table IV-10 Continued

CDMT: Developments in the industry in China since January 1, 2017

Item	Firm	Event
Capital infusions and acquisitions	HVST	March 2022: Hengyang Valin Steel Tube Co. Ltd. (“HVST”) announced anticipated corporate capital infusions from related firms totaling CN¥1.0 billion, split between CN¥614.6 million as paid-in capital and CN¥385.4 million as capital reserves. After providing these capital infusions, Hunan Valin Steel Co. Ltd. will hold an 85.91-percent and Hunan Valin Iron & Steel Group Co. Ltd. a 14.09-percent ownership shares in HVST.
New equipment	Chengxin	First-quarter 2021–first-quarter 2023: Changzhou Chengxin Metal Products Co. Ltd. (“Chengxin”) announced several capital investments to its production facility in Changzhou over the past two years, including a new skiving (cutting and slicing) and roller-burnishing machine (late-March 2023), heat-treating furnace (January 2023), automatic saw-cutting and polishing machinery (December 2022), and straightening machinery (July 2022); refurbished another automatic sawing machine (April 2022); improvements to its cold-drawing workshop (September 2022); and installing a non-destructive testing facility (January 2021).
New facility	Changbao	March 2023: Changbao announced that its subsidiary Changbao Special Fine and Steel Pipe Co. Ltd. plans to invest CN¥520 million (\$76.4 million) for constructing a new facility to provide precision steel pipe for “new-energy vehicle (“NEV”) manufacturers.
New facility	Alleima	September 2023: Sweden-based specialty (stainless and alloy) steel tubular producer, Alleima AB, announced its SEK250 million (\$23 million) capital investment to construct a new cold-finishing facility at its existing facility in Zhenjiang, to meet anticipated growing demand for heat-exchange, composite, and other tubular products by China’s chemicals and petrochemicals sectors. Production is anticipated to commence in 2025.
New facility	Hongyi	2023: Hongyi announced the completion of its new steel tubular facility, currently designated as its “New Factory.”

Table continued.

Table IV-10 Continued
CDMT: Developments in the industry in China since January 1, 2017

Source: Hongyi, "About Us" webpage, ©2022, <https://hongyisteelpipe.com/html/about/>, retrieved December 6, 2023; Hongyi, "Development Path" webpage, ©2022, <https://hongyisteelpipe.com/html/about/fazhanlicheng/>, retrieved December 6, 2023; Hongbao Group, "About Us, Development History," ©2023, http://www.hongbao.com/history_en.html, retrieved October 25, 2023; Hongbao High-Precise Pipe & Tube, "About Us," ©2023, http://www.hongbao.com/pube/pupe_index_en.html, retrieved October 25, 2023; Raymond, "Full Automatic Production Equipment For Seamless Steel Pipes," November 17, 2017, <http://www.raysteeltube.com/Full-Automatic-Production-Equipment-For-Seamless-Steel-Pipes-id537730.html>; SMS Group, "ChangBao Orders World's Most Advanced Seamless Tube Plant From SMS Group," News release, March 20, 2019, <https://www.sms-group.com/en-cz/press-and-media/press-releases/press-release-detail/changbao-orders-worlds-most-advanced-seamless-tube-plant-from-sms-group>; Steel Orbis, "SMS to Supply Seamless Tube Plant to ChangBao Precision Steel Tube," March 21, 2019, <https://www.steelorbis.com/steel-news/latest-news/sms-to-supply-seamless-tube-plant-for-changbao-precision-steel-tube-1086404.htm>; Reuters, "Brief— Daye Special Steel To Invest In Zhejiang Gross Seamless Steel Tube's Bankruptcy Reorganisation," Yahoo! News, May 15, 2019, <https://sg.news.yahoo.com/brief-daye-special-steel-invest-121502712.html>; Hengyang Hongda, "About Us" web page, ©2021, <http://en.hyhdtg.com/intro/5.html>, retrieved March 21, 2023; Chengxin, "News" web page, <http://czchengxin.com/News/>, retrieved March 21, 2023; Asian Metals, "Daye Special Steel to change name as CITIC Special Steel," September 3, 2019, <https://www.asianmetal.com/news/data/1511626/Daye%20Special%20Steel%20to%20change%20name%20as%20CITIC%20Special%20Steel>; Charmaine Little, "Company Fails to Prove Steel Manufacturer and Distributor Sold It Defective Product," Southeastern Texas Record, January 31, 2020, <https://setexasrecord.com/stories/524413922-company-fails-to-prove-steel-manufacturer-and-distributor-sold-it-defective-product>; Shanghai Metals Market ("SMM"), "Citic Special Steel Successfully Won a 40% Stake in Shanghai Electric Group Steel Pipe Co. Ltd.," January 22, 2021, <https://news.metal.com/newscontent/101380195/citic-special-steel-successfully-won-a-40-stake-in-shanghai-electric-group-steel-pipe-co-ltd>; HVST, "Hengyang Valin Steel Tube Co. Ltd. Announced That It Expects to Receive Funding From Hunan Valin Iron & Steel Group Co. Ltd., Hunan Valin Steel Co. Ltd.," Market Screener, March 24, 2022, <https://www.marketscreener.com/quote/stock/HUNAN-VALIN-STEEL-CO-LTD-6496806/news/Hengyang-Valin-Steel-Tube-Co-Ltd-announced-that-it-expects-to-receive-funding-from-Hunan-Valin-Ir-39897756/>; Changzhou Chengxin, "Skiving & Roller Burnishing Machine Put Into Use," News release No. 39, March 28, 2023, <http://www.czchengxin.com/News/39.html>; Changzhou Chengxin, "A New Heat Treating Furnace Was Put Into Use," News release No. 38, January 2, 2023, <http://www.czchengxin.com/News/38.html>; Changzhou Chengxin, "New Workshop Put Into Use," News release No. 37, December 28, 2022, <http://www.czchengxin.com/News/37.html>; Changzhou Chengxin, "New Automatic Saw Cutting Machine Put Into Use," News release No. 36, December 16, 2022, <http://www.czchengxin.com/News/36.html>; Changzhou Chengxin, "New Straightening Machine Installed," News release No. 34, August 9, 2022, <http://www.czchengxin.com/News/34.html>; Changzhou Chengxin, "New Sawing Machine," News release No. 33, April 20, 2022, <http://www.czchengxin.com/News/33.html>; Changzhou Chengxin, "Cold drawing Workshop Improvement," News release No. 35, September 30, 2022, <http://www.czchengxin.com/News/35.html>; Changzhou Chengxin, "Non-destructive Detection Facility Under Installation," News release No. 27, January 27, 2021, <http://www.czchengxin.com/News/27.html>; SteelOrbis, "Changbao Steel Tube Subsidiary to Invest in Precision Pipe Project for NEVs," March 23, 2023, <https://www.steelorbis.com/steel-news/latest-news/changbao-steel-tube-subsidiary-to-invest-in-precision-pipe-project-for-nevs-1283737.htm>; Alleima, "Alleima Invests in New Facility in China to Meet Increasing Demand in the Chemical and Petrochemical Segment," September 5, 2023, <https://www.alleima.com/en/news-media/archive/2023/09/alleima-invests-in-new-facility-in-china-to-meet-increasing-demand-in-the-chemical-and-petrochemical-segment/>; Alleima, "Alleima China Secures First Order of Sanicro® 35," November 8, 2023, <https://www.alleima.com/en/news-media/archive/2023/11/alleima-china-secures-first-order-of-sanicro-35/>; Domestic interested parties' response to notice of institution, p. 7, exh. 3, Domestic interested parties' prehearing brief, p. 20, exh. 2.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from China are South Korea, Vietnam, and India (table IV-11). During 2022, the United States was the eighth-largest export market for certain cold-drawn tubes from China, accounting for 3.5 percent.

Table IV-11
Certain cold-drawn tubes: Exports from China, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	19,688	10,309	6,881
South Korea	Quantity	34,450	34,280	55,195
Vietnam	Quantity	13,075	13,031	19,941
India	Quantity	61,129	55,911	35,947
Iran	Quantity	16,340	5,054	3,207
Russia	Quantity	1,721	2,341	2,843
Turkey	Quantity	5,587	6,289	3,495
Thailand	Quantity	6,824	5,396	9,288
United Arab Emirates	Quantity	1,716	1,699	3,265
All other destination markets	Quantity	82,340	107,646	106,142
Non-U.S. destination markets	Quantity	223,183	231,648	239,322
All destination markets	Quantity	242,871	241,957	246,203
United States	Value	24,664	17,284	12,553
South Korea	Value	34,905	40,712	62,039
Vietnam	Value	21,928	25,389	41,526
India	Value	69,605	82,108	54,298
Iran	Value	16,079	7,641	3,827
Russia	Value	2,511	3,365	4,353
Turkey	Value	6,295	8,093	4,086
Thailand	Value	9,048	7,029	11,159
United Arab Emirates	Value	1,791	2,502	3,945
All other destination markets	Value	107,137	144,182	147,117
Non-U.S. destination markets	Value	269,299	321,021	332,350
All destination markets	Value	293,963	338,305	344,903

Table continued.

Table IV-11 Continued**Certain cold-drawn tubes: Exports from China, by destination market and by period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	6,382	6,814	11,411
South Korea	Quantity	45,730	41,793	56,738
Vietnam	Quantity	20,956	22,079	30,454
India	Quantity	40,383	19,077	26,222
Iran	Quantity	17,736	15,848	17,001
Russia	Quantity	5,730	5,847	15,733
Turkey	Quantity	5,151	8,907	12,721
Thailand	Quantity	10,402	10,280	12,712
United Arab Emirates	Quantity	6,004	7,532	10,937
All other destination markets	Quantity	99,309	114,807	134,176
Non-U.S. destination markets	Quantity	251,401	246,171	316,694
All destination markets	Quantity	257,783	252,984	328,105
United States	Value	10,332	12,963	23,111
South Korea	Value	48,182	57,669	86,187
Vietnam	Value	31,889	36,151	54,759
India	Value	47,481	27,755	53,100
Iran	Value	18,712	18,219	23,038
Russia	Value	9,451	9,098	32,623
Turkey	Value	5,322	11,718	19,728
Thailand	Value	12,346	14,773	20,462
United Arab Emirates	Value	7,149	8,667	14,637
All other destination markets	Value	128,601	177,018	239,601
Non-U.S. destination markets	Value	309,133	361,068	544,135
All destination markets	Value	319,464	374,032	567,246

Table continued.

Table IV-11 Continued**Certain cold-drawn tubes: Exports from China, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	1,253	1,677	1,824
South Korea	Unit value	1,013	1,188	1,124
Vietnam	Unit value	1,677	1,948	2,083
India	Unit value	1,139	1,469	1,511
Iran	Unit value	984	1,512	1,193
Russia	Unit value	1,459	1,438	1,531
Turkey	Unit value	1,127	1,287	1,169
Thailand	Unit value	1,326	1,303	1,201
United Arab Emirates	Unit value	1,044	1,473	1,208
All other destination markets	Unit value	1,301	1,339	1,386
Non-U.S. destination markets	Unit value	1,207	1,386	1,389
All destination markets	Unit value	1,210	1,398	1,401
United States	Share of quantity	8.1	4.3	2.8
South Korea	Share of quantity	14.2	14.2	22.4
Vietnam	Share of quantity	5.4	5.4	8.1
India	Share of quantity	25.2	23.1	14.6
Iran	Share of quantity	6.7	2.1	1.3
Russia	Share of quantity	0.7	1.0	1.2
Turkey	Share of quantity	2.3	2.6	1.4
Thailand	Share of quantity	2.8	2.2	3.8
United Arab Emirates	Share of quantity	0.7	0.7	1.3
All other destination markets	Share of quantity	33.9	44.5	43.1
Non-U.S. destination markets	Share of quantity	91.9	95.7	97.2
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-11 Continued**Certain cold-drawn tubes: Exports from China, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,619	1,903	2,025
South Korea	Unit value	1,054	1,380	1,519
Vietnam	Unit value	1,522	1,637	1,798
India	Unit value	1,176	1,455	2,025
Iran	Unit value	1,055	1,150	1,355
Russia	Unit value	1,649	1,556	2,073
Turkey	Unit value	1,033	1,316	1,551
Thailand	Unit value	1,187	1,437	1,610
United Arab Emirates	Unit value	1,191	1,151	1,338
All other destination markets	Unit value	1,295	1,542	1,786
Non-U.S. destination markets	Unit value	1,230	1,467	1,718
All destination markets	Unit value	1,239	1,478	1,729
United States	Share of quantity	2.5	2.7	3.5
South Korea	Share of quantity	17.7	16.5	17.3
Vietnam	Share of quantity	8.1	8.7	9.3
India	Share of quantity	15.7	7.5	8.0
Iran	Share of quantity	6.9	6.3	5.2
Russia	Share of quantity	2.2	2.3	4.8
Turkey	Share of quantity	2.0	3.5	3.9
Thailand	Share of quantity	4.0	4.1	3.9
United Arab Emirates	Share of quantity	2.3	3.0	3.3
All other destination markets	Share of quantity	38.5	45.4	40.9
Non-U.S. destination markets	Share of quantity	97.5	97.3	96.5
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by China Customs in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in Germany

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from six firms, which accounted for approximately *** percent of production of CDMT in Germany during 2016, and whose exports to the United States accounted for approximately *** percent of U.S. imports from Germany during 2016.¹²

In the current proceeding, the Commission issued a foreign producer questionnaire to nine firms in Germany for which valid contact information was identified and received responses from three producers: Benteler Steel / Tube GmbH (“Benteler GmbH”), Jansen GmbH,¹³ and Vincenz Wiederholt GmbH (“Wiederholt”). These firms are estimated to have accounted for *** of production of CDMT in Germany during 2022 and their exports to the United States accounted for *** percent of U.S. imports of CDMT from Germany in 2022.¹⁴ An additional firm, Thiel & Hoche GmbH & Co. KG (“Thiel & Hoche”), reported being only an exporter of CDMT from Germany.¹⁵

¹² The five responding producers in Germany were Benteler Steel / Tube GmbH, Jansen GmbH, Mannesmann Precision Tubes GmbH (formerly Salzgitter Mannesmann Precision GmbH), Poppe + Potthoff Präzisionsstahlrohre GmbH, and Vincenz Wiederholt GmbH. An additional firm, Thiel & Hoche GmbH & Co. KG, reported being only an exporter of CDMT from Germany. Original confidential report, p. VII-9.

¹³ Jansen GmbH provided data for 2017 to 2021. In early 2021, Jansen’s precision tubes business was sold to Muhr und Bender KG (“Mubea”). Mubea did not provide a response to the Commission’s questionnaire.

¹⁴ Coverage estimate is based on U.S. imports compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

¹⁵ The producers identified by Thiel & Hoche for its exports of CDMT from Germany are ***. Thiel & Hoche’s exports to the United States from Germany accounted for *** percent of U.S. imports from Germany in 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, *** percent in 2021, *** percent in 2022, *** percent during January-June 2022, and *** percent during January-June 2023.

Table IV-12 presents information on the CDMT operations of the responding producers in Germany.

Table IV-12
CDMT: Summary data for producers in Germany, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Benteler GmbH	***	***	***	***	***	***
Jansen GmbH	***	***	***	***	***	***
Wiederholt	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Jansen GmbH provided data for 2017 to 2021. In early 2021, Jansen's precision tubes business was sold to Mubea. Mubea did not provide a response to the Commission's questionnaire. Jansen GmbH accounted for *** percent of reported CDMT production in Germany during 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021.

Developments in the industry

Table IV-13 presents events in the CDMT industry in Germany since the Commission’s original investigations.

Table IV-13
CDMT: Developments in the industry in Germany since January 1, 2017

Item	Firm	Event
Expansion	Thiel & Hoche	Late 2016: Exporter Thiel & Hoche acquired and expanded the production capacity of tube component facility STC GmbH, located in Sundern. STC GmbH produces components for the automotive industry.
Acquisition	P+P	March 2021: Werther-based Poppe + Poppoff GmbH (“P+P”) acquired a 51-percent ownership share of Daaden-based Walter Henrich GmbH, a producer of guide and spindle tubes for vehicle steering mechanisms and rotor and tubular shafts for various other applications.
Acquisition	Mubea	April 2021: After receiving regulatory approval, Muhr und Bender KG (“Mubea”) completed its acquisition of the Jansen Group’s (“Jansen”) Precision Tubes Division. The two Jansen facilities, located in Dingelstät, Germany, and Oberriet, Switzerland, produce tubular components for the automotive sector and lifting columns for the furniture and construction sectors. According to a Mubea managing partner, “[T]he acquisition of the Steel Tubes division of the Jansen Group will create the conditions for the global positioning of Mubea’s precision steel tubes activities. This will enable us to meet the technical requirements of our customers worldwide in the future and expand our position as one of the leading steel tube manufacturers.” Mubea’s OBR Steel Tubes AG subsidiary will continue operation the acquired facilities under the existing brand name “Jansen Steel Tubes.”
Acquisition	Thiel & Hoche	2023: Exporter Thiel & Hoche acquired Spezialgeräte Schmölln Ablängtechnik, located east of Thuringia. According to Thiel & Hoche, their new acquisition, renamed as “T+H Ablängtechnik,” “significantly expanded our capacities for the cutting and surface treatment of pipes and solid steel material on modern equipment.”

Source: T&H, “About Us, Thiel & Hoche” web page, <https://www.thiel-hoche.de/en/company/about-thiel-and-hoche.html>, retrieved March 21, 2023; T&H, “The Locations of Thiel & Hoche” web page, <https://www.thiel-hoche.de/en/company/locations.html>, retrieved March 21, 2023; STC, “Manufacturing Process,” web page, <https://www.stc-gmbh.com/en/services/manufacturing-process/>, retrieved December 19, 2023; P+P, “A New Member Has Joined the Group of Companies, Walter Henrich GmbH and Poppe + Poppoff GmbH Entered Into Partnership on March 2nd, 2021,” news release, March 11, 2021, <https://www.poppe-potthoff.com/current/public-relation/a-new-member-has-joined-the-group-of-companies/>; Mubea “Mubea Strengthens Its Position in Precision Steel Tubes Sector, Acquisition of the Steel Tubes Division of the Jansen Group,” news release, January 13, 2021, https://www.mubea.com/sites/default/files/2021-11/20210113_Mubea_Jansen_Press%20release.pdf; Jansen, “Mubea Completes Takeover of Jansen Steel Tubes,” news release, April 7, 2021, <https://www.jansen.com/en/news/detail/7/4/2021/mubea-completes-takeover-of-jansen-steel-tubes.html>; Domestic interested parties’ response to notice of institution, p. 7, exh. 3; Domestic interested parties’ prehearing brief, p. 24, exh. 4.

Changes in operations

Producers in Germany were asked to report any change in the character of their operations or organization relating to the production of CDMT since January 1, 2017. Two of three responding producers indicated in their questionnaires that they had experienced such changes. Table IV-14 presents the changes identified by these producers.

Table IV-14
CDMT: Reported changes in operations by firms in Germany, since January 1, 2017, by firm

Item	Firm name and narrative on changes in operations
Plant closings	***
Relocations	***
Consolidations	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission asked foreign producers and exporters to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm's supply chain arrangements, production, and shipments relating to CDMT. One responding producer indicated in its questionnaire that it had experienced such changes. Table IV-15 presents the firm's response to this question.

Table IV-15
CDMT: Impact of COVID-19 on operations in Germany, by firm

Firm	Narrative on COVID-19 impact on operations
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CDMT¹⁶

Table IV-16 presents data on the responding German producers' installed capacity, practical capacity, and production on the same equipment.

Table IV-16
CDMT: German producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical CDMT	Capacity	***	***	***
Practical CDMT	Production	***	***	***
Practical CDMT	Utilization	***	***	***

Table continued.

Table IV-16 Continued
CDMT: German producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CDMT	Capacity	***	***	***	***	***
Practical CDMT	Production	***	***	***	***	***
Practical CDMT	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

¹⁶ Jansen GmbH provided data on its CDMT operations in Germany for 2017 to 2021. In early 2021, Jansen's precision tubes business was sold to Mubea. Mubea did not provide a response to the Commission's questionnaire; therefore, trends for the data presented in this section for Germany may be affected by any missing data from Mubea. Jansen GmbH accounted for *** percent of reported CDMT production in Germany during 2017, *** percent in 2018, *** percent in 2019, *** percent in 2020, and *** percent in 2021.

All three responding German producers reported constraints in the manufacturing process. Table IV-17 presents German producers' reported narratives regarding practical capacity constraints.

Table IV-17
CDMT: German producers' reported capacity constraints since January 1, 2017

Type of constraint	Firm name and narrative on reported constraint
Production bottlenecks	***
Fuel or energy	***
Logistics/transportation	***
Other constraints	***
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-18 presents data on the CDMT operations of the responding producers in Germany. Overall, during 2017-22, German producers' capacity for CDMT decreased by *** percent and production decreased by *** percent. German producers' capacity and production were both lower in interim 2023 compared with interim 2022 (by *** percent and by *** percent, respectively).¹⁷ Annual capacity utilization ranged from *** percent in 2020 to *** percent in 2017. It was higher in interim 2023 (*** percent) than in interim 2022 (*** percent).

¹⁷ As previously noted, Jansen, which provided data for 2017 to 2021, sold its precision tubes business to Mubea, which did not provide a response. In its last full year of operation in 2020, Jansen's reported practical capacity to produce CDMT in Germany was *** short tons and its production was *** short tons.

Table IV-18
CDMT: Data for producers in Germany, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Exports to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Exports to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-18 Continued
CDMT: Data for producers in Germany, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Exports to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Exports to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-18 Continued
CDMT: Data for producers in Germany, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Exports to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Exports to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-18 Continued
CDMT: Data for producers in Germany, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Exports to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Exports to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

As a share of total shipments, export shipments decreased from *** percent in 2017 to *** percent in 2020 before increasing to *** percent in 2022. Exports accounted for *** and *** percent of total shipments in interim 2022 and interim 2023, respectively. End-of-period inventories held by producers in Germany declined overall by *** percent from 2017 to 2022, and were *** percent lower in interim 2023 than in interim 2022.

Table IV-19 presents export data provided by the responding CDMT producers in Germany, as well as data provided by exporter Thiel & Hoche, by destination market. Export shipments to the United States, which accounted for *** percent or less of total exports from Germany in each period, fluctuated downward in absolute and relative quantities from 2017 to 2020, increased in 2021 and 2022, and were lower in interim 2023 compared with interim 2022. The largest export market for CDMT from Germany was the European Union, which accounted for *** percent of total reported exports from Germany in 2022. Asian export markets accounted for only *** percent of total reported exports from Germany in 2022. Export shipments to both the European Union and Asian export markets increased from 2017 to 2018, declined in 2019 and 2020, before again increasing in 2021 and 2022 to levels below those reported in 2017. Exports to the European Union were lower in interim 2023 compared with interim 2022, whereas exports to Asia were higher. Exports to other non-U.S. destination export markets, which accounted for *** percent of total exports from Germany, declined overall from 2017 to 2022, and were lower in interim 2023 compared with interim 2022.¹⁸

¹⁸ All other primary destination export markets identified by responding firms include ***.

Table IV-19**CDMT: Producers' and resellers' exports from Germany, by destination market and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; share and ratio in percent

Destination market	Measure	2017	2018	2019
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-19 Continued

CDMT: Producers' and resellers' exports from Germany, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; share and ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". Ratios represent the portion of the producers' total shipments that are exported by producers and resellers.

Alternative products

One responding producer in Germany (***) produced other products on the same equipment and machinery used to produce CDMT.¹⁹ As shown in table IV-20, CDMT accounted for *** of total production on shared equipment during each of the periods examined during 2017-22 and January-June 2023.

Table IV-20

CDMT: Overall production on the same equipment as in-scope production in Germany, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2017	2018	2019
CDMT	Quantity	***	***	***
Other products	Quantity	***	***	***
Total production on same machinery	Quantity	***	***	***
CDMT	Share	***	***	***
Other products	Share	***	***	***
Total production on same machinery	Share	***	***	***

Table continued.

Table IV-20 Continued

CDMT: Overall production on the same equipment as in-scope production in Germany, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CDMT	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Total production on same machinery	Quantity	***	***	***	***	***
CDMT	Share	***	***	***	***	***
Out-of-scope production	Share	***	***	***	***	***
Total production on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

¹⁹ Out-of-scope items include ***.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Germany are Italy, the United States, and France (table IV-21). During 2022, the United States was the second-largest export market for certain cold-drawn tubes from Germany, accounting for 9.7 percent.

Table IV-21
Certain cold-drawn tubes: Exports from Germany, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	18,201	16,025	13,758
Italy	Quantity	19,848	19,361	14,349
France	Quantity	11,186	12,338	10,945
Netherlands	Quantity	10,268	14,882	9,718
Poland	Quantity	3,977	7,723	8,087
Austria	Quantity	10,726	12,145	11,373
United Kingdom	Quantity	8,245	8,878	8,838
Sweden	Quantity	8,413	7,877	6,689
Hungary	Quantity	4,923	6,391	4,902
All other destination markets	Quantity	72,124	78,126	72,571
Non-U.S. destination markets	Quantity	149,710	167,720	147,472
All destination markets	Quantity	167,911	183,745	161,230
United States	Value	50,665	44,805	38,490
Italy	Value	34,539	40,759	32,138
France	Value	23,135	29,557	25,314
Netherlands	Value	19,744	29,840	20,534
Poland	Value	9,649	17,642	18,168
Austria	Value	22,839	29,013	26,482
United Kingdom	Value	14,500	17,948	17,319
Sweden	Value	15,004	16,822	14,114
Hungary	Value	17,017	21,769	15,923
All other destination markets	Value	179,042	207,796	187,664
Non-U.S. destination markets	Value	335,469	411,146	357,655
All destination markets	Value	386,134	455,951	396,145

Table continued.

Table IV-21 Continued**Certain cold-drawn tubes: Exports from Germany, by destination market and by period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	10,309	14,310	17,090
Italy	Quantity	12,318	17,937	18,607
France	Quantity	10,711	13,936	15,983
Netherlands	Quantity	7,935	11,527	14,638
Poland	Quantity	7,671	9,938	11,589
Austria	Quantity	9,089	11,021	10,082
United Kingdom	Quantity	5,658	8,981	8,150
Sweden	Quantity	5,274	7,314	7,486
Hungary	Quantity	4,004	5,650	7,246
All other destination markets	Quantity	47,998	66,021	64,450
Non-U.S. destination markets	Quantity	110,657	152,326	158,232
All destination markets	Quantity	120,966	166,636	175,322
United States	Value	30,673	46,682	67,406
Italy	Value	25,054	41,446	51,762
France	Value	25,998	37,929	41,578
Netherlands	Value	16,773	25,559	36,450
Poland	Value	17,375	25,400	30,463
Austria	Value	20,489	28,651	31,995
United Kingdom	Value	10,991	20,174	23,621
Sweden	Value	11,017	16,409	19,939
Hungary	Value	13,183	19,661	25,807
All other destination markets	Value	126,631	194,989	218,596
Non-U.S. destination markets	Value	267,511	410,218	480,212
All destination markets	Value	298,184	456,900	547,618

Table continued.

Table IV-21 Continued**Certain cold-drawn tubes: Exports from Germany, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	2,784	2,796	2,798
Italy	Unit value	1,740	2,105	2,240
France	Unit value	2,068	2,396	2,313
Netherlands	Unit value	1,923	2,005	2,113
Poland	Unit value	2,426	2,284	2,247
Austria	Unit value	2,129	2,389	2,329
United Kingdom	Unit value	1,759	2,022	1,960
Sweden	Unit value	1,783	2,136	2,110
Hungary	Unit value	3,456	3,406	3,248
All other destination markets	Unit value	2,482	2,660	2,586
Non-U.S. destination markets	Unit value	2,241	2,451	2,425
All destination markets	Unit value	2,300	2,481	2,457
United States	Share of quantity	10.8	8.7	8.5
Italy	Share of quantity	11.8	10.5	8.9
France	Share of quantity	6.7	6.7	6.8
Netherlands	Share of quantity	6.1	8.1	6.0
Poland	Share of quantity	2.4	4.2	5.0
Austria	Share of quantity	6.4	6.6	7.1
United Kingdom	Share of quantity	4.9	4.8	5.5
Sweden	Share of quantity	5.0	4.3	4.1
Hungary	Share of quantity	2.9	3.5	3.0
All other destination markets	Share of quantity	43.0	42.5	45.0
Non-U.S. destination markets	Share of quantity	89.2	91.3	91.5
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-21 Continued**Certain cold-drawn tubes: Exports from Germany, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	2,975	3,262	3,944
Italy	Unit value	2,034	2,311	2,782
France	Unit value	2,427	2,722	2,601
Netherlands	Unit value	2,114	2,217	2,490
Poland	Unit value	2,265	2,556	2,629
Austria	Unit value	2,254	2,600	3,173
United Kingdom	Unit value	1,943	2,246	2,898
Sweden	Unit value	2,089	2,244	2,664
Hungary	Unit value	3,293	3,480	3,561
All other destination markets	Unit value	2,638	2,953	3,392
Non-U.S. destination markets	Unit value	2,417	2,693	3,035
All destination markets	Unit value	2,465	2,742	3,124
United States	Share of quantity	8.5	8.6	9.7
Italy	Share of quantity	10.2	10.8	10.6
France	Share of quantity	8.9	8.4	9.1
Netherlands	Share of quantity	6.6	6.9	8.3
Poland	Share of quantity	6.3	6.0	6.6
Austria	Share of quantity	7.5	6.6	5.8
United Kingdom	Share of quantity	4.7	5.4	4.6
Sweden	Share of quantity	4.4	4.4	4.3
Hungary	Share of quantity	3.3	3.4	4.1
All other destination markets	Share of quantity	39.7	39.6	36.8
Non-U.S. destination markets	Share of quantity	91.5	91.4	90.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by Eurostat in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in India

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for approximately *** percent of production of CDMT in India during 2016 and whose exports to the United States accounted for approximately *** percent of U.S. imports from India during 2016.²⁰

In the current proceeding, the Commission issued a foreign producer questionnaire to 20 firms in India for which valid contact information was identified and received responses from three firms: Heavy Metal and Tubes (India) Private Limited (“Heavy Metal and Tubes”); ISMT Limited (“ISMT”); and Tube Products of India, A Unit of Tube Investments of India Limited (“Tube Products of India”). These firms’ exports to the United States accounted for approximately *** percent of U.S. imports of CDMT from India in 2022.²¹ According to estimates requested of the responding producers in India, these firms accounted for *** of production of CDMT in India during 2022.

²⁰ The three responding producers in India are Goodluck India Limited, ISMT Limited, and Tube Products of India. Original confidential report, p. VII-15.

²¹ Coverage estimate is based on U.S. imports compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

Table IV-22 presents information on the CDMT operations of the responding producers and exporters in India.

Table IV-22
CDMT: Summary data for producers in India, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Heavy Metal and Tubes	***	***	***	***	***	***
ISMT	***	***	***	***	***	***
Tube Products of India	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Developments in the industry

Table IV-23 presents events in the CDMT industry in India since the Commission’s original investigations.

Table IV-23
CDMT: Developments in the industry in India since January 1, 2017

Item	Firm	Event
Acquisition	Meta Engitech	September 2018: Metamorphosis Engitech India Pvt. Ltd. (“Meta Engitech”) acquired from the Liquidators the assets of Innoventive Industries Ltd. The Tube Division consists of two tubular facilities. Unit I at Sanaswadi has an annual production capacity of 72,000 metric tons (79,366 short tons) of electric resistance welded (“ERW”) tubes and Unit II at Pimple Jagtap, has an annual production capacity of 30,000 metric tons (33,069 short tons) of cold drawn electric welded (“CEW”) tubes.
Acquisition	Tata Steel BSL	November 2018: Bhushan Steel Ltd., a manufacturer of a wide range of steel products, including drawn tubes, was acquired by Tata Steel. Subsequently, its name was changed to “Tata Steel BSL Ltd.” and its overall annual production capacity was expanded more than three-fold, from 3 million metric tons (3.3 million short tons) to 5 million metric tons (5.5 million short tons), and more recently to 10 million metric tons (11.0 million short tons) in 2022.
New products	Meta Engitech	Fourth-quarter 2022/first-quarter 2023: Meta Engitech claims that its research and development (“R&D”) efforts “led to a breakthrough innovation of our globally patented ‘Cold Pilgering’ process to produce CDW/DOM {cold-drawn welded and drawn-over-mandrel} tubes directly from ERW tubes without using a drawbench.” The firm further claims that its CDW/DOM tubes provide “...a better surface finish, dimensional accuracy, and strength.”
Merger	ISMT	November 2022: ISMT Ltd. announced a merger with Kirloskar Ferrous Industry Ltd. (“KFIL”), an Indian producer of pig iron and iron castings.
New facility	TII	November 2023: Tube Investments of India (“TII”) Ltd. announced its \$28-million capital investment plans for a new tubular steel facility in western India, which is anticipated to commence operations by the end of fiscal year 2024–25. This facility, being capable of producing a wide variety of precision tubular steel products, will expand TII’s products portfolio.
New facility	Goodluck	2023: Goodluck Industries/Goodluck India Ltd. (“Goodluck”) is constructing a new Large Diameter Plant (“LDP”) production unit at its Sikandrabad facility, Uttar Pradesh State, to meet anticipated demand growth for cold-drawn welded and drawn-over-mandrel (“CDW/DOM”) tubular steel products by India’s automotive sector. This new CDW/DOM Tubes Division facility is to be completed by second-quarter 2024, with annual production capacity of 30,000 metric tons (33,069 short tons), and capabilities to manufacture tubular steel products with outside diameters ranging from 88.9 mm to 219.0 mm (3.5 inches to 8.6 inches) and with wall thicknesses up to 16 mm (0.63 inch).

Table continued.

Table IV-23 Continued
CDMT: Developments in the industry in India since January 1, 2017

Source: Meta Engitech, “Infomeric Rating,” press release, September 27, 2022, <https://www.infomeric.com/admin/uploads/pr-Metamorphosis-27sep22.pdf>; SteelOrbis, “Tata Steel Looking to Achieve Expansion a Few Years Earlier,” May 5, 2022, <https://www.steelorbis.com/steel-news/latest-news/tata-steel-looking-to-achieve-capacity-expansion-target-a-few-years-earlier-1242897.htm>; Tata Steel, “Bhushan Steel Limited is Now Tata Steel BSL Limited Now,” news release, November 28, 2018, <https://www.tatasteel.com/media/newsroom/press-releases/india/2018/bhushan-steel-limited-is-tata-steel-bsl-limited-now/>; Meta Engitech, “About Us, Welcome to the Meta Engitech” web page, ©2022, <https://www.metaengitech.com/about-us.php>, retrieved March 21, 2023; ISMT, “The merger of KFIL and ISMT announced,” press release, November 6, 2022, <https://www.ismt.co.in/media/news?article=1577585>; TII, “Green Precision: Tube Investments’ Steel Aspirations,” Steel Guru Business News, November 1, 2023, <https://www.steelguru.com/steel/green-precision-tube-investments-steel-aspirations>; Goodluck, “The Company is Setting Up a New Production Unit in Sikandrabad in Tune with the Growth of the Auto Sector,” no date, <https://www.goodluckindia.com/cdwttubes/future-plans.php>, retrieved December 6, 2023; Domestic interested parties’ response to notice of institution, pp. 7–8, exh. 3; Domestic interested parties’ prehearing brief, p. 32, exh. 6.

Changes in operations

Producers in India were asked to report any change in the character of their operations or organization relating to the production of CDMT since January 1, 2017. All three responding producers indicated in their questionnaires that they had experienced such changes. Table IV-24 presents the changes identified by these producers.

Table IV-24
CDMT: Reported changes in operations in India, since January 1, 2017, by firm

Item	Firm name and narrative on changes in operations
Plant openings	***
Acquisitions	***
Acquisitions	***

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission asked foreign producers to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm’s supply chain arrangements, production, and shipments relating to CDMT. One responding producer indicated in its questionnaire that it had experienced such changes. Table IV-25 presents the firm’s response to this question.

Table IV-25
CDMT: Impact of COVID-19 on operations in India, by firm

Firm	Narrative on COVID-19 impact on operations
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CDMT

Table IV-26 presents data on the installed capacity, practical capacity, and production on the same equipment as reported by responding producers of CDMT in India.²²

Table IV-26
CDMT: Indian producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical CDMT	Capacity	***	***	***
Practical CDMT	Production	***	***	***
Practical CDMT	Utilization	***	***	***

Table continued.

Table IV-26 Continued
CDMT: Indian producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CDMT	Capacity	***	***	***	***	***
Practical CDMT	Production	***	***	***	***	***
Practical CDMT	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

²² None of the responding CDMT producers in India reported constraints in the manufacturing process.

Table IV-27 presents data on the CDMT operations of the responding producers and exporters in India. During 2017-22, the Indian producers' capacity for CDMT increased steadily by *** percent and was higher by *** percent in interim 2023 compared with interim 2022. Production increased from 2017 to 2018, declined in 2019 and 2020, before increasing again in 2021 and 2022 to a level *** percent higher than that reported in 2017. Production was also *** percent higher in interim 2023 than in interim 2022. Annual capacity utilization ranged from *** percent in 2020 to *** percent in 2022, and was lower in interim 2023 (*** percent) than in interim 2022 (*** percent).

Home market shipments accounted for the majority (from *** to *** percent) of total shipments, by quantity, whereas export shipments to the United States accounted for a relatively smaller share. That is, as a share of total shipments, export shipments to the United States decreased from *** percent in 2017 to *** percent in 2018 and 2019, increased to *** percent in 2021, decreased again to *** percent in 2022, and were lower at *** percent in interim 2023 compared with *** percent in interim 2022. Export shipments to the United States followed a similar trend in absolute terms, decreasing from 2017 to 2019, increasing in 2021 before declining again in 2022 to a level *** percent below that in 2017. Exports to the United States also were lower in interim 2023 compared with interim 2022. The quantity of export shipments to the European Union and Asia, which accounted for *** percent and *** percent, respectively, of total shipments during 2022, fluctuated upward from 2017 to 2022. Export shipments to the European Union were lower in interim 2023 compared with interim 2022, whereas export shipments to Asia were higher. Export shipments to other export destinations (primarily ***) accounted for *** percent or less of total shipments in each period.

End-of-period inventories held by producers in India fluctuated upward, ending at *** percent higher in 2022 than in 2017 and *** percent higher in interim 2023 than in interim 2022.

Table IV-27
CDMT: Data on industry in India, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export to the United States	Quantity	***	***	***
Export to the European Union	Quantity	***	***	***
Export Asia	Quantity	***	***	***
Export to all other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
Export to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export to the United States	Value	***	***	***
Export to the European Union	Value	***	***	***
Export Asia	Value	***	***	***
Export to all other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
Export to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-27 Continued
CDMT: Data on industry in India, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export to the United States	Quantity	***	***	***	***	***
Export to the European Union	Quantity	***	***	***	***	***
Export Asia	Quantity	***	***	***	***	***
Export to all other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
Export to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export to the United States	Value	***	***	***	***	***
Export to the European Union	Value	***	***	***	***	***
Export Asia	Value	***	***	***	***	***
Export to all other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
Export to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-27 Continued
CDMT: Data on industry in India, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export to the United States	Unit value	***	***	***
Export to the European Union	Unit value	***	***	***
Export Asia	Unit value	***	***	***
Export to all other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
Export to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export to the United States	Share	***	***	***
Export to the European Union	Share	***	***	***
Export Asia	Share	***	***	***
Export to all other markets	Share	***	***	***
Non-U.S. destination markets	Share	***	***	***
Export to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-27 Continued
CDMT: Data on industry in India, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export to the United States	Unit value	***	***	***	***	***
Export to the European Union	Unit value	***	***	***	***	***
Export Asia	Unit value	***	***	***	***	***
Export to all other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
Export to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export to the United States	Share	***	***	***	***	***
Export to the European Union	Share	***	***	***	***	***
Export Asia	Share	***	***	***	***	***
Export to all other markets	Share	***	***	***	***	***
Non-U.S. destination markets	Share	***	***	***	***	***
Export to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Alternative products

Two of the three responding producers in India (***) produced other products on the same equipment and machinery used to produce CDMT.²³ As shown in table IV-28, CDMT accounted for *** of total production on shared equipment during each of the periods examined during 2017-22 and January-June 2023.

Table IV-28

CDMT: Overall production on the same equipment as in-scope production in India, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2017	2018	2019
CDMT	Quantity	***	***	***
Other products	Quantity	***	***	***
Total production on same machinery	Quantity	***	***	***
CDMT	Share	***	***	***
Other products	Share	***	***	***
Total production on same machinery	Share	***	***	***

Table continued.

Table IV-28 Continued

CDMT: Overall production on the same equipment as in-scope production in India, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CDMT	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Total production on same machinery	Quantity	***	***	***	***	***
CDMT	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Total production on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

²³ Out-of-scope items include ***.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from India are the United States, Canada, Turkey, and Mexico (table IV-29). During 2022, the United States was the largest export market for certain cold-drawn tubes from India, accounting for 39.8 percent.

Table IV-29
Certain cold-drawn tubes: Exports from India, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	5,524	10,394	6,843
Canada	Quantity	362	705	442
Turkey	Quantity	271	531	94
Mexico	Quantity	93	146	131
Italy	Quantity	1,207	1,142	1,128
France	Quantity	982	744	864
United Arab Emirates	Quantity	613	809	1,247
Sweden	Quantity	1,896	2,046	1,179
Brazil	Quantity	369	213	317
All other destination markets	Quantity	2,173	2,492	2,149
Non-U.S. destination markets	Quantity	7,965	8,827	7,550
All destination markets	Quantity	13,489	19,221	14,393
United States	Value	7,044	13,461	9,418
Canada	Value	531	986	605
Turkey	Value	326	732	121
Mexico	Value	138	220	144
Italy	Value	1,878	1,939	1,734
France	Value	1,379	1,150	1,254
United Arab Emirates	Value	1,052	1,821	2,549
Sweden	Value	2,786	2,745	1,878
Brazil	Value	456	287	563
All other destination markets	Value	3,423	5,620	5,213
Non-U.S. destination markets	Value	11,970	15,499	14,060
All destination markets	Value	19,014	28,960	23,478

Table continued.

Table IV-28 Continued
Certain cold-drawn tubes: Exports from India, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	2,048	4,850	9,122
Canada	Quantity	547	715	2,194
Turkey	Quantity	633	1,444	2,160
Mexico	Quantity	380	2,170	1,499
Italy	Quantity	1,174	1,158	1,396
France	Quantity	764	1,164	1,232
United Arab Emirates	Quantity	1,437	361	1,210
Sweden	Quantity	349	1,394	822
Brazil	Quantity	152	686	812
All other destination markets	Quantity	1,678	2,050	2,471
Non-U.S. destination markets	Quantity	7,115	11,143	13,796
All destination markets	Quantity	9,163	15,994	22,918
United States	Value	2,780	6,146	16,030
Canada	Value	580	871	3,860
Turkey	Value	803	1,657	2,916
Mexico	Value	497	2,635	2,358
Italy	Value	1,812	1,613	2,324
France	Value	1,051	1,563	1,836
United Arab Emirates	Value	2,684	906	3,018
Sweden	Value	751	1,963	1,246
Brazil	Value	211	1,191	1,857
All other destination markets	Value	5,069	5,133	7,400
Non-U.S. destination markets	Value	13,459	17,531	26,814
All destination markets	Value	16,239	23,678	42,844

Table continued.

Table IV-28 Continued
Certain cold-drawn tubes: Exports from India, by destination market and by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	1,275	1,295	1,376
Canada	Unit value	1,468	1,397	1,368
Turkey	Unit value	1,203	1,379	1,289
Mexico	Unit value	1,486	1,503	1,098
Italy	Unit value	1,557	1,699	1,538
France	Unit value	1,404	1,546	1,451
United Arab Emirates	Unit value	1,716	2,252	2,044
Sweden	Unit value	1,470	1,342	1,593
Brazil	Unit value	1,237	1,349	1,774
All other destination markets	Unit value	1,576	2,255	2,426
Non-U.S. destination markets	Unit value	1,503	1,756	1,862
All destination markets	Unit value	1,410	1,507	1,631
United States	Share of quantity	41.0	54.1	47.5
Canada	Share of quantity	2.7	3.7	3.1
Turkey	Share of quantity	2.0	2.8	0.7
Mexico	Share of quantity	0.7	0.8	0.9
Italy	Share of quantity	8.9	5.9	7.8
France	Share of quantity	7.3	3.9	6.0
United Arab Emirates	Share of quantity	4.5	4.2	8.7
Sweden	Share of quantity	14.1	10.6	8.2
Brazil	Share of quantity	2.7	1.1	2.2
All other destination markets	Share of quantity	16.1	13.0	14.9
Non-U.S. destination markets	Share of quantity	59.0	45.9	52.5
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-28 Continued**Certain cold-drawn tubes: Exports from India, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,357	1,267	1,757
Canada	Unit value	1,061	1,218	1,759
Turkey	Unit value	1,268	1,147	1,350
Mexico	Unit value	1,309	1,214	1,572
Italy	Unit value	1,543	1,392	1,665
France	Unit value	1,376	1,343	1,491
United Arab Emirates	Unit value	1,868	2,510	2,494
Sweden	Unit value	2,152	1,408	1,516
Brazil	Unit value	1,382	1,735	2,287
All other destination markets	Unit value	3,020	2,504	2,995
Non-U.S. destination markets	Unit value	1,892	1,573	1,944
All destination markets	Unit value	1,772	1,480	1,869
United States	Share of quantity	22.3	30.3	39.8
Canada	Share of quantity	6.0	4.5	9.6
Turkey	Share of quantity	6.9	9.0	9.4
Mexico	Share of quantity	4.1	13.6	6.5
Italy	Share of quantity	12.8	7.2	6.1
France	Share of quantity	8.3	7.3	5.4
United Arab Emirates	Share of quantity	15.7	2.3	5.3
Sweden	Share of quantity	3.8	8.7	3.6
Brazil	Share of quantity	1.7	4.3	3.5
All other destination markets	Share of quantity	18.3	12.8	10.8
Non-U.S. destination markets	Share of quantity	77.7	69.7	60.2
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheading 7304.31 and 7304.51 as reported by India Ministry of Commerce in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in Italy

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from four firms, which accounted for *** production of CDMT in Italy during 2016, and whose exports to the United States accounted for approximately *** percent of U.S. imports from Italy during 2016.²⁴

In the current proceeding, the Commission issued a foreign producer questionnaire to 13 firms in Italy for which valid contact information was identified and received responses from the following 4 producers: Dalmine S.p.A. (“Dalmine”);²⁵ Marcegaglia Carbon Steel S.p.A (“Marcegaglia”); Metalfer S.p.A. (“Metalfer”); and Trafiltubi S.r.L. (“Trafiltubi”).²⁶ These firms’ exports to the United States accounted for *** percent of U.S. imports of CDMT from Italy in 2022.²⁷ According to reasonable estimates requested of the responding producers in Italy and responses to the Commission’s notice of institution in these reviews, these firms accounted for approximately *** percent of production of CDMT in Italy during 2022. An additional firm, Thiel & Hoche GmbH & Co. KG (“Thiel & Hoche”), reported being solely an exporter/reseller of CDMT from Italy.²⁸

²⁴ The four responding producers in Italy are Dalmine S.p.A., Marcegaglia Carbon Steel S.p.A., Metalfer S.p.A., and Trafiltubi SRL. Original confidential report, p. VII-21.

²⁵ Dalmine is a wholly owned subsidiary of Tenaris. Tenaris press release, <https://ir.tenaris.com/static-files/77cf21d2-29d1-4a6e-ac83-fc97611f6f76>, retrieved December 12, 2023.

²⁶ The following three firms in Italy responded that they had not produced or exported the subject CDMT since January 1, 2017: Arvedi Tubi Acciaio, Eurotubi S.r.L., and Pipex Italia S.p.A.

²⁷ Coverage estimate is based on U.S. imports compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

²⁸ The producers in Italy identified by Thiel & Hoche for its exports of CDMT from Italy are ***. Thiel & Hoche’s exports to the United States from Italy was *** short tons or less during each period and accounted for *** percent or less of U.S. imports from Italy in each of the periods.

Table IV-30 presents information on the CDMT operations of the responding producers and exporters in Italy.

Table IV-30
CDMT: Summary data for producers in Italy, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Dalmine	***	***	***	***	***	***
Marcegaglia	***	***	***	***	***	***
Metalfer	***	***	***	***	***	***
Trafiltubi	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Developments in the industry

Table IV-31 presents events in the CDMT industry in Italy since the Commission's original investigations.

Table IV-31
CDMT: Developments in the industry in Italy since January 1, 2017

Item	Firm	Event
New equipment	Eurotubi	2018: As the first of a series of annual capital investments to enhance and improve its production capabilities, Eurotubi S.r.l. installed the new Tube Mill P3, installed a new HF Solid State tube-welding machine at Tube Mill P1, and constructed a new warehouse for the raw materials.
New equipment	Eurotubi	2019: Eurotubi's new installations included a new flying cutting machine for Tube Mill P2, a new 3D laser machine, and new client management software.
Acquisition	Marcegaglia	February 2020: Marcegaglia Carbon Steel S.p.A. ("Marcegaglia"), claims that its acquisition of Novero of Rivoli, confirms "its leadership in the cold-drawn welded tubes sector." Forecasts for the plant estimate an increase in annual production of 8,000 metric tons (8,818 short tons) to a total of over 20,000 tons (22,046 short tons). This brings the combined annual production capacity of cold-drawn carbon steel welded tubes at its Boltiere and Rivoli plants to 100,000 metric tons (110,231 short tons).

Table continued.

Table IV-31 Continued

CDMT: Developments in the industry in Italy since January 1, 2017

Item	Firm	Event
New products	ŽP	August 2020: Železiarne Podbrezová (“ŽP”) announced that equipment and processing improvements (to the circularity of dies and draw lengths) enabled it to increase rolled-tube lengths and wall thicknesses at its stretch reducing mill. Hence, ŽP is able to offer expanded product lines of cold-rolled and cold-drawn tubes for customers using tubes for mechanical processing.
Operational and administrative upgrades	Eurotubi	2020: Eurotubi reorganized the laser and special workings department and installed a new production planning software and a new paperless data collection system.
New logistic center	Eurotubi	January 2021: Eurotubi constructed a new logistic center for managing its product inventories. The new Warehouse Management System (“WMS”) automatically tracks the in-flow, storage locations, inventory levels, and out-flows for up to 3,000 items.
Acquisition	Profiltubi	July 2021: Profiltubi SpA, a producer of electro-welded steel pipes, acquired OMV Officine Metallurgiche Ventura SpA, a producer of steel pipes for the automotive, appliances, and furniture sectors. Profiltubi reportedly anticipates this acquisition will strengthen its presence in existing markets by expanding its product lines and will enable it to enter new markets.
Capital investments	Tenaris	December 2021: Tenaris S.A. completed its €20 million (\$22.6 million) capital investment to expand the production capabilities of its steel tubular facility in Dalmine. The medium size rolling mill can now produce larger diameters, from 16 inches up to 18 ⁵ / ₈ inches (406 mm up to 473 mm). The medium size rolling mill also eliminates the need to reheat larger diameter pipes before undergoing the secondary rolling process at the facility’s expander mill. Streamlining the production process generates lower surface scaling, consumes less water, emits fewer air emissions, and reduces both internal transportation needs and fuel consumption.

Source: Eurotubi, “Our History” web page, <https://eurotubi.it/en/company/our-history/>, retrieved March 21, 2023; Marcegaglia, “Leader of Cold-drawn Welded Tubes,” news release, February 21, 2020, https://www.marcegaglia.com/officialwebsite/marcegaglia_notizie/leader-of-cold-drawn-welded-tubes/; PIPEXItalia, “ŽP is Expanding Dimension Range in Its Portfolio,” August 25, 2020, <https://www.pipex.it/zp-is-expanding-dimension-range/>; Eurotubi, “Industry 4.0 Arrives at Eurotubi” web page, <https://eurotubi.it/en/industry-4-0-arrives-at-eurotubi/>, retrieved March 21, 2023; PBV Monitor, “Profiltubi SpA Has Acquired OMV Officine Metallurgiche Ventura SpA,” August 3, 2021, https://www.ilnorddestquotidiano-it.translate.google.com/2021/08/03/profilitubi-s-p-a-ha-acquisito-o-m-v-officine-metallurgiche-ventura-s-p-a/?x_tr_sl=it&x_tr_tl=en&x_tr_hl=en&x_tr_pto=sc; Tenaris, “Expansion of Large Diameter Line at Tenaris’s Mill in Italy Lowers Carbon Emissions,” December 2, 2021, <https://www.tenaris.com/en/news/2021/expansion-of-large-diameter-line-in-italy-lowers-carbon-emissions#:~:text=Tenaris's%20facility%20in%20Dalmine%2C%20Italy,a%20more%20streamlined%20manufacturing%20process>; Domestic interested parties’ response to notice of institution, p. 8, exh. 3; Domestic interested parties’ prehearing brief, exh. 11.

Changes in operations

Producers in Italy were asked to report any change in the character of their operations or organization relating to the production of CDMT since January 1, 2017. All four responding producers indicated in their questionnaires that they had experienced such changes. Table IV-32 presents the changes identified by these producers.

Table IV-32

CDMT: Reported changes in operations in Italy, since January 1, 2017, by firm

Item	Firm name and narrative on changes in operations
Acquisitions	***
Expansions	***
Prolonged shutdowns	***
Prolonged shutdowns	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission asked foreign producers and exporters to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm's supply chain arrangements, production, and shipments relating to CDMT. Table IV-33 presents the firms' responses to this question.

Table IV-33

CDMT: Impact of COVID-19 on operations in Italy, by firm

Firm	Narrative on COVID-19 impact on operations
***	***
***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Operations on CDMT

Table IV-34 presents data on the installed capacity, practical capacity, and production on the same equipment as reported by responding producers of CDMT in Italy.

Table IV-34
CDMT: Italian producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical CDMT	Capacity	***	***	***
Practical CDMT	Production	***	***	***
Practical CDMT	Utilization	***	***	***

Table continued.

Table IV-34 Continued
CDMT: Italian producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CDMT	Capacity	***	***	***	***	***
Practical CDMT	Production	***	***	***	***	***
Practical CDMT	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--".

Two of the four responding Italian producers reported constraints in the manufacturing process. Table IV-35 presents Italian producers' reported narratives regarding practical capacity constraints.

Table IV-35

CDMT: Italian producers' reported capacity constraints since January 1, 2017

Type of constraint	Firm name and narrative on reported constraint
Production bottlenecks	***
Production bottlenecks	***
Existing labor force	***
Storage capacity	***
Logistics/transportation	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-36 presents data on the CDMT operations of the responding producers in Italy. During 2017-22, the Italian producers' capacity for CDMT fluctuated upward within a relatively narrow range, ending at *** percent higher in 2022 than in 2017. There was no change in reported capacity in interim 2023 compared with interim 2022. Production fluctuated upward within a much wider range, increasing from 2017 to 2018, declining in 2019 and 2020, increasing again in 2021, before declining in 2022 to a level *** percent higher than that reported in 2017. Production was *** percent lower in interim 2023 than in interim 2022. Annual capacity utilization ranged from *** percent in 2020 to *** percent in 2021, and was lower in interim 2023 (*** percent) than in interim 2022 (*** percent).

As a share of total shipments, export shipments increased slightly from *** percent in 2017 to *** percent in 2018 before declining to *** percent in 2021, then increasing to *** percent in 2022, a level higher than reported in 2017. Exports accounted for *** and *** percent of total shipments in interim 2022 and interim 2023, respectively. End-of-period inventories held by producers in Italy fluctuated upward, ending at *** percent higher in 2022 than in 2017 and *** percent higher in interim 2023 than in interim 2022.

Table IV-36
CDMT: Data for producers in Italy, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Exports to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Exports to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-36 Continued
CDMT: Data for producers in Italy, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Exports to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Exports to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-36 Continued
CDMT: Data for producers in Italy, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Exports to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Exports to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-36 Continued
CDMT: Data for producers in Italy, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Exports to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Exports to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Export shipments accounted for the majority (almost ***) of total shipments, by quantity, whereas export shipments to the United States accounted for a much smaller share. As a share of total shipments, export shipments to the United States decreased from *** percent in 2017 to *** percent in 2019, increased to *** percent in 2021, decreased again to *** percent in 2021 and 2022, and were marginally lower at *** percent in interim 2023 compared with *** percent in interim 2022. Export shipments to the United States followed a similar trend in absolute terms, decreasing from 2017 to 2019, increasing in 2020 before declining again in 2022 to a level *** percent below that in 2017. Exports to the United States also were *** lower in interim 2023 compared with interim 2022.

Table IV-37 presents export data provided by the responding CDMT producers in Italy, as well as data provided by exporter Thiel & Hoche, by destination market. Export shipments to the United States, which accounted for *** percent of total exports in 2017 and *** percent of total exports in 2022, fluctuated downward in absolute and relative quantities from 2017 to 2022, and were lower in interim 2023 compared with interim 2022. The largest export market for CDMT from Italy is the European Union, which accounted for *** percent of total reported exports from Italy in 2022. Asian export markets accounted for *** percent of total reported exports from Italy in 2022, Canada accounted for *** percent, and other non-U.S. destination export markets accounted for *** percent.²⁹ Export shipment quantities to each of these non-U.S. destination markets fluctuated upward from 2017 to 2018-19, generally declined in 2020-21, and were higher in 2022 than in 2017. Other than exports to Asia, export shipment quantities were lower in interim 2023 compared with interim 2022.

Export shipments to Canada from Italy, which accounted for *** percent of total exports in 2017, *** percent of total exports in 2022, and *** percent and *** percent of total exports in interim 2022 and interim 2023, respectively, increased in absolute and relative quantities from 2017 to 2019, declined in 2020, increased again during 2021-22, and were lower in interim 2023 than in interim 2022. The unit values of exports to Canada at \$*** and \$*** per short ton in 2017 and 2018, respectively, were higher than the unit values of exports to the United States. Although the unit values of exports to Canada fluctuated upward throughout 2017 to \$*** per short ton in June 2023, they remained lower than the unit values of exports to the United States during every period except 2017 and 2018.

²⁹ All other primary destination export markets identified by responding firms include ***.

Table IV-37**CDMT: Producers' and resellers' exports from Italy, by destination market and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; share and ratio in percent

Destination market	Measure	2017	2018	2019
United States	Quantity	***	***	***
European Union	Quantity	***	***	***
Asia	Quantity	***	***	***
Canada	Quantity	***	***	***
All other destination markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
All destination markets	Quantity	***	***	***
United States	Value	***	***	***
European Union	Value	***	***	***
Asia	Value	***	***	***
Canada	Value	***	***	***
All other destination markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
All destination markets	Value	***	***	***
United States	Unit value	***	***	***
European Union	Unit value	***	***	***
Asia	Unit value	***	***	***
Canada	Unit value	***	***	***
All other destination markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
All destination markets	Unit value	***	***	***
United States	Share of quantity	***	***	***
European Union	Share of quantity	***	***	***
Asia	Share of quantity	***	***	***
Canada	Share of quantity	***	***	***
All other destination markets	Share of quantity	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***
All destination markets	Share of quantity	***	***	***
United States	Ratio	***	***	***
European Union	Ratio	***	***	***
Asia	Ratio	***	***	***
Canada	Ratio	***	***	***
All other destination markets	Ratio	***	***	***
Non-U.S. destination markets	Ratio	***	***	***
All destination markets	Ratio	***	***	***

Table continued.

Table IV-37 Continued

CDMT: Producers' and resellers' exports from Italy, by destination market and period

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; share and ratio in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
United States	Quantity	***	***	***	***	***
European Union	Quantity	***	***	***	***	***
Asia	Quantity	***	***	***	***	***
Canada	Quantity	***	***	***	***	***
All other destination markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
All destination markets	Quantity	***	***	***	***	***
United States	Value	***	***	***	***	***
European Union	Value	***	***	***	***	***
Asia	Value	***	***	***	***	***
Canada	Value	***	***	***	***	***
All other destination markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
All destination markets	Value	***	***	***	***	***
United States	Unit value	***	***	***	***	***
European Union	Unit value	***	***	***	***	***
Asia	Unit value	***	***	***	***	***
Canada	Unit value	***	***	***	***	***
All other destination markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
All destination markets	Unit value	***	***	***	***	***
United States	Share of quantity	***	***	***	***	***
European Union	Share of quantity	***	***	***	***	***
Asia	Share of quantity	***	***	***	***	***
Canada	Share of quantity	***	***	***	***	***
All other destination markets	Share of quantity	***	***	***	***	***
Non-U.S. destination markets	Share of quantity	***	***	***	***	***
All destination markets	Share of quantity	***	***	***	***	***
United States	Ratio	***	***	***	***	***
European Union	Ratio	***	***	***	***	***
Asia	Ratio	***	***	***	***	***
Canada	Ratio	***	***	***	***	***
All other destination markets	Ratio	***	***	***	***	***
Non-U.S. destination markets	Ratio	***	***	***	***	***
All destination markets	Ratio	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "--". Ratios represent the portion of the producers' total shipments that are exported by producers and resellers.

Alternative products

Two of the four responding producers in Italy (***) produced other products on the same equipment and machinery used to produce CDMT.³⁰ As shown in table IV-38, CDMT accounted for *** of total production on shared equipment during each of the periods examined during 2017-22 and January-June 2023.

Table IV-38

CDMT: Overall production on the same equipment as in-scope production in Italy, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2017	2018	2019
CDMT	Quantity	***	***	***
Other products	Quantity	***	***	***
Total production on same machinery	Quantity	***	***	***
CDMT	Share	***	***	***
Other products	Share	***	***	***
Total production on same machinery	Share	***	***	***

Table continued.

Table IV-38 Continued

CDMT: Overall production on the same equipment as in-scope production in Italy, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CDMT	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Total production on same machinery	Quantity	***	***	***	***	***
CDMT	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Total production on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

³⁰ Out-of-scope items include ***.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Italy are Germany, Romania, and Bulgaria (table IV-39). During 2022, the United States was the fifth-largest export market for certain cold-drawn tubes from Italy, accounting for 4.7 percent.

Table IV-39
Certain cold-drawn tubes: Exports from Italy, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	3,334	3,513	2,070
Germany	Quantity	17,318	24,206	19,889
Romania	Quantity	4,743	5,341	3,473
Bulgaria	Quantity	3,096	4,237	3,789
France	Quantity	3,043	4,034	4,678
Spain	Quantity	4,188	3,459	3,140
Finland	Quantity	4,484	5,696	4,359
United Kingdom	Quantity	1,882	2,481	2,593
Sweden	Quantity	3,095	3,652	2,841
All other destination markets	Quantity	21,787	29,344	29,108
Non-U.S. destination markets	Quantity	63,635	82,450	73,871
All destination markets	Quantity	66,969	85,963	75,941
United States	Value	7,441	8,430	5,607
Germany	Value	30,746	49,679	38,627
Romania	Value	8,907	10,585	7,462
Bulgaria	Value	4,443	8,055	6,835
France	Value	6,789	11,146	11,407
Spain	Value	6,870	7,325	6,528
Finland	Value	7,457	10,816	8,449
United Kingdom	Value	5,424	5,951	5,819
Sweden	Value	4,984	6,897	5,210
All other destination markets	Value	46,495	66,173	64,400
Non-U.S. destination markets	Value	122,114	176,629	154,738
All destination markets	Value	129,555	185,059	160,344

Table continued.

Table IV-39 Continued**Certain cold-drawn tubes: Exports from Italy, by destination market and by period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	959	1,997	3,841
Germany	Quantity	14,344	20,193	24,005
Romania	Quantity	4,707	8,777	9,550
Bulgaria	Quantity	2,273	5,173	6,326
France	Quantity	2,877	4,201	3,860
Spain	Quantity	2,222	3,310	3,366
Finland	Quantity	2,578	3,394	2,908
United Kingdom	Quantity	1,418	1,784	2,514
Sweden	Quantity	2,394	2,657	2,460
All other destination markets	Quantity	19,935	20,496	23,483
Non-U.S. destination markets	Quantity	52,748	69,984	78,471
All destination markets	Quantity	53,707	71,981	82,312
United States	Value	4,116	6,105	13,603
Germany	Value	27,621	41,951	61,758
Romania	Value	7,630	15,254	21,757
Bulgaria	Value	3,537	9,719	15,266
France	Value	6,900	10,948	12,480
Spain	Value	4,524	6,850	8,702
Finland	Value	4,646	6,501	6,871
United Kingdom	Value	3,355	5,559	10,089
Sweden	Value	4,093	5,030	6,118
All other destination markets	Value	43,880	52,774	65,989
Non-U.S. destination markets	Value	106,186	154,587	209,031
All destination markets	Value	110,302	160,692	222,634

Table continued.

Table IV-39 Continued**Certain cold-drawn tubes: Exports from Italy, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	2,232	2,400	2,709
Germany	Unit value	1,775	2,052	1,942
Romania	Unit value	1,878	1,982	2,149
Bulgaria	Unit value	1,435	1,901	1,804
France	Unit value	2,231	2,763	2,439
Spain	Unit value	1,641	2,118	2,079
Finland	Unit value	1,663	1,899	1,938
United Kingdom	Unit value	2,883	2,398	2,244
Sweden	Unit value	1,611	1,889	1,834
All other destination markets	Unit value	2,134	2,255	2,212
Non-U.S. destination markets	Unit value	1,919	2,142	2,095
All destination markets	Unit value	1,935	2,153	2,111
United States	Share of quantity	5.0	4.1	2.7
Germany	Share of quantity	25.9	28.2	26.2
Romania	Share of quantity	7.1	6.2	4.6
Bulgaria	Share of quantity	4.6	4.9	5.0
France	Share of quantity	4.5	4.7	6.2
Spain	Share of quantity	6.3	4.0	4.1
Finland	Share of quantity	6.7	6.6	5.7
United Kingdom	Share of quantity	2.8	2.9	3.4
Sweden	Share of quantity	4.6	4.2	3.7
All other destination markets	Share of quantity	32.5	34.1	38.3
Non-U.S. destination markets	Share of quantity	95.0	95.9	97.3
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-39 Continued
Certain cold-drawn tubes: Exports from Italy, by destination market and by period

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	4,291	3,057	3,542
Germany	Unit value	1,926	2,077	2,573
Romania	Unit value	1,621	1,738	2,278
Bulgaria	Unit value	1,556	1,879	2,413
France	Unit value	2,398	2,606	3,233
Spain	Unit value	2,037	2,070	2,585
Finland	Unit value	1,803	1,916	2,363
United Kingdom	Unit value	2,365	3,116	4,013
Sweden	Unit value	1,710	1,893	2,487
All other destination markets	Unit value	2,201	2,575	2,810
Non-U.S. destination markets	Unit value	2,013	2,209	2,664
All destination markets	Unit value	2,054	2,232	2,705
United States	Share of quantity	1.8	2.8	4.7
Germany	Share of quantity	26.7	28.1	29.2
Romania	Share of quantity	8.8	12.2	11.6
Bulgaria	Share of quantity	4.2	7.2	7.7
France	Share of quantity	5.4	5.8	4.7
Spain	Share of quantity	4.1	4.6	4.1
Finland	Share of quantity	4.8	4.7	3.5
United Kingdom	Share of quantity	2.6	2.5	3.1
Sweden	Share of quantity	4.5	3.7	3.0
All other destination markets	Share of quantity	37.1	28.5	28.5
Non-U.S. destination markets	Share of quantity	98.2	97.2	95.3
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by Eurostat in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in South Korea

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from two firms, which accounted for *** production of CDMT in South Korea during 2016, and whose exports to the United States accounted for approximately *** percent of U.S. imports from South Korea during 2016.³¹

In the current proceeding, the Commission issued a foreign producer questionnaire to 18 firms in South Korea for which valid contact information was identified and received a single response from SIC Tube Co., Ltd. (“SIC Tube”). This firm’s exports to the United States accounted for approximately *** percent of U.S. imports of CDMT from South Korea in 2022.³² SIC Tube accounted for *** percent of production of CDMT in South Korea during 2016.³³

Table IV-40 presents information on the CDMT operations of the responding producer in South Korea.

Table IV-40
CDMT: Summary data for the responding producer in South Korea, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm’s total shipments exported to the United States (percent)
SIC Tube	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

³¹ The two responding producers in South Korea are Sangshin Industrial Co. Ltd. (currently known as SIC Tube), and Yulchon Co. Ltd. Original confidential report, p. VII-27.

³² Coverage estimate is based on U.S. imports compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

³³ Original confidential report, p. VII-27 and table VII-20.

Developments in the industry

Table IV-41 presents events in the CDMT industry in South Korea since the Commission’s original investigations.

Table IV-41
CDMT: Developments in the industry in South Korea since January 1, 2017

Item	Firm	Event
New producer	SNL Enterprise	October 2017: SNL Enterprise Co. Ltd. started producing ERW pipes and cold-drawn tubes for automobile parts, machine parts, and cylinders. In the following month (November 2017), SNL entered the U.S. market and developed customers among U.S. automotive parts suppliers.
Plant opening	Busung Steel	2017: Busung Steel Co. opened a second facility in Iksan that specializes in producing precision cold-drawn tubes.
New equipment	Busung Steel	2018: Busung Steel installed a three-head automatic cutting machining center. The Iksan facility has annual production capacity of 30,000 metric tons (33,069 short tons), but with unused capacity of 12,000 metric tons (13,228 short tons), the capacity utilization rate is 60 percent.
Expansion	TPC	August 2019: TPC Co. Ltd., a manufacturer of tube and pipe products, including “precision as-welded tubes,” added a second tube mill line (Tube Mill Line 2) at its Gyeongsan-si facility to produce 1-inch diameter tubes.
Plant opening	SIC Tube	2020: SIC Tube Co. Ltd., a precision steel tube manufacturer, established a second production facility in Dangjin City that focuses on machining, forming, and cold drawing.
Expansion	Nexteel	August 2021: Nexteel Co. Ltd. installed two new pipe mill lines at its Pohang 1 st Factory. The 2-inch diameter pipe mill line has annual production capacity of 150,000 metric tons (165,347 short tons). The 6-inch diameter pipe mill has annual production capacity of 36,000 metric tons (39,683 short tons).
Production automation	TJ Glovsteel	2021: TJ Glovsteel Co. Ltd., a manufacturer of cold-drawn precision carbon steel Tubes, reported capital investments to adopt factory automation (“FA”) and achieve “Smart Factory” status.

Source: SNL Enterprise, “How Our Company Came To Be” web page, http://www.snle.co.kr/en/sub_01_03.html, retrieved March 21, 2023; Busung Steel, “History” web page, <http://www.busung-steel.com/p/history>, retrieved March 21, 2023; Busung Steel, “Company Overview, Busung Steel Iksan” web page, <http://www.busung-steel.com/p/overview>, retrieved March 21, 2023; TPC, “History” web page, <http://www.tc21.co.kr/usr/content/view.do?contentId=24¤tMenuNo=403>, retrieved March 21, 2023; Sic Tube, “Locations” web page, ©2021, <http://sictube.com/locations/>, retrieved March 21, 2023; Nexteel, “History” web page, <http://www.nexteel.co.kr/website/en/sub.html?menuId=ab&page=history>, retrieved March 21, 2023; Nexteel, “Products, Facility Features” web page, http://www.nexteel.co.kr/website/en/sub.html?menuId=bd&page=facility_features#none, retrieved March 21, 2023; TJ Glovsteel, “Index” web page, <http://eg.tjglovsteel.com/index>, retrieved March 21, 2023; Domestic interested parties’ response to NOI, p. 9, exh. 1; Domestic interested parties’ prehearing brief, p. 45, exh. 12.

Changes in operations

The responding producer in South Korea reported no changes in the character of its operations or organization relating to the production of CDMT since January 1, 2017. The Commission also asked foreign producers to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm's supply chain arrangements, production, and shipments relating to CDMT. The responding producer in South Korea indicated that it had not experienced any such COVID-19-related changes.

Operations on CDMT

Table IV-42 presents data on the installed capacity, practical capacity, and production on the same equipment as reported by the responding producer of CDMT in South Korea.

Table IV-42
CDMT: South Korean producer's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical CDMT	Capacity	***	***	***
Practical CDMT	Production	***	***	***
Practical CDMT	Utilization	***	***	***

Table continued.

Table IV-42 Continued

CDMT: South Korean producer's overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CDMT	Capacity	***	***	***	***	***
Practical CDMT	Production	***	***	***	***	***
Practical CDMT	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table IV-43 presents the South Korean producer's reported narratives regarding practical capacity constraints.

Table IV-43

CDMT: South Korean producer's reported capacity constraints since January 1, 2017

Type of constraint	Firm name and narrative on reported constraint
Other constraints	***

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-44 presents data on the CDMT operations of the responding producer in South Korea. Throughout all periods examined since 2017, the annual capacity for CDMT production in South Korea remained constant at *** short tons and there was no change in reported capacity in interim 2023 compared with interim 2022. Production fluctuated upward from 2017 to 2020, and declined thereafter to a level *** percent higher than that reported in 2017. Production was *** percent lower in interim 2023 than in interim 2022. Annual capacity utilization ranged from *** percent in 2019 to *** percent in 2020 and 2021, and was lower in interim 2023 than in interim 2022.

Export shipments accounted for the entirety of total shipments for the responding producer in South Korea, with export shipments to the United States accounting for a relatively smaller and steadily declining share of the total. As a share of total shipments, export shipments to the United States decreased from *** percent in 2017 and 2018 to *** percent in 2022, and declined to *** in interim 2023 from a *** share held in interim 2022. Export shipments to the United States followed a similar downward trend in absolute terms, decreasing from 2017 to 2022 to a level *** percent below that in 2017. The quantity of export shipments to the European Union and Asia, which accounted for *** percent and *** percent, respectively, of total shipments during 2022, remained constant from 2017 to 2021, after which exports to Asia declined in 2022. Export shipments to the European Union were the same in interim 2023 compared with interim 2022, whereas export shipments to Asia declined to ***. Export shipments to other export destinations (primarily ***) accounted for *** total shipments during 2020-22, but there were no reported shipments to other export destinations during 2017-19 and interim 2023.

End-of-period inventories held by producers in South Korea also trended downward, ending at *** percent lower in 2022 than in 2017 and *** percent lower in interim 2023 than in interim 2022.

Table IV-44
CDMT: Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export to the United States	Quantity	***	***	***
Export to the European Union	Quantity	***	***	***
Export Asia	Quantity	***	***	***
Export to all other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
Export to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export to the United States	Value	***	***	***
Export to the European Union	Value	***	***	***
Export Asia	Value	***	***	***
Export to all other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
Export to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-44 Continued
CDMT: Data on industry in South Korea, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export to the United States	Quantity	***	***	***	***	***
Export to the European Union	Quantity	***	***	***	***	***
Export Asia	Quantity	***	***	***	***	***
Export to all other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
Export to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export to the United States	Value	***	***	***	***	***
Export to the European Union	Value	***	***	***	***	***
Export Asia	Value	***	***	***	***	***
Export to all other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
Export to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-44 Continued
CDMT: Data on industry in South Korea, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export to the United States	Unit value	***	***	***
Export to the European Union	Unit value	***	***	***
Export Asia	Unit value	***	***	***
Export to all other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
Export to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export to the United States	Share	***	***	***
Export to the European Union	Share	***	***	***
Export Asia	Share	***	***	***
Export to all other markets	Share	***	***	***
Non-U.S. destination markets	Share	***	***	***
Export to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-44 Continued
CDMT: Data on industry in South Korea, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export to the United States	Unit value	***	***	***	***	***
Export to the European Union	Unit value	***	***	***	***	***
Export Asia	Unit value	***	***	***	***	***
Export to all other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
Export to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export to the United States	Share	***	***	***	***	***
Export to the European Union	Share	***	***	***	***	***
Export Asia	Share	***	***	***	***	***
Export to all other markets	Share	***	***	***	***	***
Non-U.S. destination markets	Share	***	***	***	***	***
Export to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Alternative products

The responding firm in South Korea reported the production of no other products on the same equipment and machinery used to produce CDMT.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from South Korea are Canada, Chile, and Romania (table IV-45). During 2022, the United States was the twenty fourth-largest export market for certain cold-drawn tubes from South Korea, accounting for 0.1 percent.

Table IV-45**Certain cold-drawn tubes: Exports from South Korea, by destination market and by period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	1,166	405	353
Canada	Quantity	4,731	12,276	6,888
Chile	Quantity	2,324	2,616	647
Romania	Quantity	7,524	8,231	8,473
Indonesia	Quantity	6,381	6,120	5,422
Italy	Quantity	5,492	5,316	4,336
United Arab Emirates	Quantity	810	135	240
Thailand	Quantity	359	559	1,027
Turkey	Quantity	1,149	250	200
All other destination markets	Quantity	17,233	10,926	6,574
Non-U.S. destination markets	Quantity	46,003	46,429	33,806
All destination markets	Quantity	47,169	46,834	34,159
United States	Value	1,843	1,171	539
Canada	Value	7,758	22,180	11,795
Chile	Value	2,884	4,158	1,077
Romania	Value	7,253	9,492	10,345
Indonesia	Value	7,610	7,836	8,075
Italy	Value	6,314	6,778	5,305
United Arab Emirates	Value	6,929	1,569	641
Thailand	Value	653	1,244	1,744
Turkey	Value	1,431	482	267
All other destination markets	Value	53,935	35,924	14,322
Non-U.S. destination markets	Value	94,765	89,662	53,572
All destination markets	Value	96,608	90,833	54,111

Table continued.

Table IV-45 Continued**Certain cold-drawn tubes: Exports from South Korea, by destination market and by period**

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	244	44	42
Canada	Quantity	7,576	13,525	15,601
Chile	Quantity	124	1,945	6,485
Romania	Quantity	---	---	2,918
Indonesia	Quantity	1,380	2,325	2,182
Italy	Quantity	2,195	199	1,955
United Arab Emirates	Quantity	567	351	1,858
Thailand	Quantity	840	660	1,086
Turkey	Quantity	289	1,082	931
All other destination markets	Quantity	5,380	4,485	5,254
Non-U.S. destination markets	Quantity	18,350	24,571	38,272
All destination markets	Quantity	18,594	24,616	38,314
United States	Value	434	115	134
Canada	Value	13,122	22,984	31,456
Chile	Value	208	3,118	14,242
Romania	Value	---	---	4,325
Indonesia	Value	1,860	3,490	3,746
Italy	Value	2,304	214	2,991
United Arab Emirates	Value	1,965	1,526	4,877
Thailand	Value	1,293	1,196	2,353
Turkey	Value	336	1,758	2,067
All other destination markets	Value	12,928	14,221	14,824
Non-U.S. destination markets	Value	34,016	48,507	80,880
All destination markets	Value	34,450	48,621	81,014

Table continued.

Table IV-45 Continued**Certain cold-drawn tubes: Exports from South Korea, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	1,581	2,890	1,527
Canada	Unit value	1,640	1,807	1,712
Chile	Unit value	1,241	1,589	1,665
Romania	Unit value	964	1,153	1,221
Indonesia	Unit value	1,193	1,280	1,489
Italy	Unit value	1,150	1,275	1,224
United Arab Emirates	Unit value	8,550	11,649	2,671
Thailand	Unit value	1,817	2,225	1,699
Turkey	Unit value	1,245	1,928	1,336
All other destination markets	Unit value	3,130	3,288	2,179
Non-U.S. destination markets	Unit value	2,060	1,931	1,585
All destination markets	Unit value	2,048	1,939	1,584
United States	Share of quantity	2.5	0.9	1.0
Canada	Share of quantity	10.0	26.2	20.2
Chile	Share of quantity	4.9	5.6	1.9
Romania	Share of quantity	16.0	17.6	24.8
Indonesia	Share of quantity	13.5	13.1	15.9
Italy	Share of quantity	11.6	11.4	12.7
United Arab Emirates	Share of quantity	1.7	0.3	0.7
Thailand	Share of quantity	0.8	1.2	3.0
Turkey	Share of quantity	2.4	0.5	0.6
All other destination markets	Share of quantity	36.5	23.3	19.2
Non-U.S. destination markets	Share of quantity	97.5	99.1	99.0
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-45 Continued**Certain cold-drawn tubes: Exports from South Korea, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	1,776	2,603	3,199
Canada	Unit value	1,732	1,699	2,016
Chile	Unit value	1,683	1,603	2,196
Romania	Unit value	---	---	1,482
Indonesia	Unit value	1,348	1,502	1,717
Italy	Unit value	1,050	1,076	1,530
United Arab Emirates	Unit value	3,469	4,352	2,625
Thailand	Unit value	1,540	1,813	2,167
Turkey	Unit value	1,160	1,624	2,219
All other destination markets	Unit value	2,403	3,171	2,821
Non-U.S. destination markets	Unit value	1,854	1,974	2,113
All destination markets	Unit value	1,853	1,975	2,114
United States	Share of quantity	1.3	0.2	0.1
Canada	Share of quantity	40.7	54.9	40.7
Chile	Share of quantity	0.7	7.9	16.9
Romania	Share of quantity	---	---	7.6
Indonesia	Share of quantity	7.4	9.4	5.7
Italy	Share of quantity	11.8	0.8	5.1
United Arab Emirates	Share of quantity	3.0	1.4	4.9
Thailand	Share of quantity	4.5	2.7	2.8
Turkey	Share of quantity	1.6	4.4	2.4
All other destination markets	Share of quantity	28.9	18.2	13.7
Non-U.S. destination markets	Share of quantity	98.7	99.8	99.9
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by Korea Trade Statistics Promotion Institute ("KTSPI") in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

The industry in Switzerland

Overview

During the final phase of the original investigations, the Commission received foreign producer/exporter questionnaires from three firms, which accounted for *** production of CDMT in Switzerland during 2016, and whose exports to the United States accounted for approximately *** percent of U.S. imports from Switzerland during 2016.³⁴

In the current proceeding, the Commission issued a foreign producer questionnaire to three firms in Switzerland for which valid contact information was identified and received responses from the following two firms: Benteler Rothrist AG and Jansen AG.³⁵ The exports to the United States in 2022 reported by Benteler Rothrist AG accounted for *** U.S. imports of CDMT from Switzerland in 2022.³⁶ Benteler Rothrist AG, which has announced plans to close its facility in Switzerland by the end of 2023, is believed to have accounted for *** of all production of CDMT in Switzerland during 2022.

Table IV-46 presents information on the CDMT operations of the responding producers and exporters in Switzerland.

Table IV-46
CDMT: Summary data for firms in Switzerland, 2022

Firm	Production (short tons)	Share of reported production (percent)	Exports to the United States (short tons)	Share of reported exports to the United States (percent)	Total shipments (short tons)	Share of firm's total shipments exported to the United States (percent)
Benteler Rothrist AG	***	***	***	***	***	***
Jansen AG	***	***	***	***	***	***
All firms	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

³⁴ The three responding producers in Switzerland are Benteler Rothrist AG, Jansen AG, and Mubea Prazisionstahlrohr AG ("Mubea"). Original confidential report, p. VII-33.

³⁵ Jansen AG, which was purchased by Swiss CDMT producer Mubea in April 2021, provided data in response to the Commission's questionnaire concerning its CDMT operations in Switzerland prior to the purchase. Mubea did not respond to the Commission's foreign producer questionnaire despite repeated attempts by staff to elicit a response.

³⁶ The coverage estimate is based on U.S. imports compiled from data submitted in response to Commission questionnaires with a supplement for nonresponding U.S. importers from proprietary Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

Developments in the industry

Table IV-47 presents events in the CDMT industry in Switzerland since the Commission’s original investigations.

Table IV-47
CDMT: Developments in the industry in Switzerland since January 1, 2017

Item	Firm	Event
Divestiture	Jansen	April 2021: Completion of the sale of the Jansen Group’s (“Jansen”) Precision Tubes Division to Muhr und Bender KG (“Mubea”). Mubea’s OBR Steel Tubes AG will take over the two Jansen facilities, located in Dingelstät, Germany, and Oberriet, Switzerland, that produce tubular components for the automotive sector and lifting columns for the furniture and construction sectors.
Production realignments	Mubea	May 2022: Mubea’s OBR Steel Tubes AG cited an uncertain automotive parts supply business for assessing the unsustainable capacity underutilization and financial performance of the former-Jansen steel tube facility in Oberriet and for deciding to realign production among its facilities in Switzerland. Reportedly, 120 of the 200 positions could be eliminated at Oberriet, after 80 employees are shifted to Mubea’s welded and cold-drawn precision steel tube facility in Arbon on Lake Constance and other facilities elsewhere worldwide. By 2024, the remaining 75 employees are likely to be producing large-diameter steel pipes and steel profiles at Oberriet.
Closure	Benteler Rothrist	February 2023: Benteler International AG (“Benteler”) announced plans to close its facility in Rothrist (Benteler Rothrist AG) by the end of the year. This facility, with 300 employees, produces welded drawn tubes for the automotive sector. The parent firm cites falling global demand for such pipes and continued rising production costs for its decision to shutter this facility. The President of the Swiss Precision turned-parts association reportedly foresees several problems for the Swiss automotive suppliers with the advent of electric vehicles (“e-vehicles”). “An e-vehicle requires ten times fewer parts than a combustion vehicle.” Moreover, many parts for electric vehicle are not required to be as precise as those for conventionally powered vehicles. Swiss firms have the reputation for producing high-precision parts, but others can produce less precise parts, often abroad.
Closure	Benteler Rothrist	April 2023: Parent-firm Benteler reaffirmed its decision to close its Benter Rothrist facility by the end of the year. An assessment process did not provide any prospects for the Rothrist facility to remain operating in a global welded tube market characterized as uncertain for several years, attributable to customs tariff barriers; continued high costs of energy, raw materials, and spare parts; and declining demand for powertrain components for vehicles with internal combustion engines.
Closure	Benteler Rothrist	September 2023: Benteler announced that production will continue at the Benter Rothrist facility “for longer than initially expected” through summer 2024, but it still intends to close down the facility thereafter.

Table continued.

Table IV-47 Continued

CDMT: Developments in the industry in Switzerland since January 1, 2017

Source: Mubea “Mubea Strengthens Its Position in Precision Steel Tubes Sector, Acquisition of the Steel Tubes Division of the Jansen Group,” news release, January 13, 2021, https://www.mubea.com/sites/default/files/2021-11/20210113_Mubea_Jansen_Press%20release.pdf; Jansen, “Mubea Completes Takeover of Jansen Steel Tubes,” news release, April 7, 2021, <https://www.jansen.com/en/news/detail/7/4/2021/mubea-completes-takeover-of-jansen-steel-tubes.html>; Thomas Griesser Kym, “Capacity and Cost problems: Mubea Plans to Restructure the Oberriet Site, Including Relocation to Arbon - Up to 120 Jobs at Risk,” St. Galler Tagblatt, May 17, 2022, https://www.tagblatt.ch/wirtschaft/ostschweiz/praezisionsstahlrohre-auslastungs-und-kostenprobleme-mubea-plant-restrukturierung-des-standorts-oberriet-samt-verlagerung-nach-arbon-bis-zu-120-jobs-in-gefahr-id.2292303?reduced=true&x_tr_sl=de&x_tr_tl=en&x_tr_hl=en&x_tr_pto=sc; Gert Bruderer, “Steel Pipe Specialist Checks Relocation of Workplaces, Oberriet-based OBR Steel Tubes AG, Which Produces Precision Steel Tubes, is Considering a Realignment. 120 Employees Would Be Directly Affected,” rheintaler.ch, updated November 2, 2022, <https://rheintaler.ch/artikel/stahlrohrspezialist-prueft-verlegung-von-arbeitsplaetzen/>; rheintal24, “OBR Steel Tubes AG: Over 100 Jobs Will Be Cut in Oberriet,” MetroComm AG, July 9, 2022, <https://www.rheintal24.ch/articles/141651-obr-steel-tubes-ag-in-oberriet-werden-ueber-100-stellen-gestrichen>; Switzerland Global Enterprise, “Leading Companies, Mubea Präzisionsstahlrohr AG,” ©2023, <https://www.s-ge.com/en/company/mubea-praezisionsstahlrohr-ag>; Gettotext.com, “300 Jobs Lost – Benteler Closes Plant in Rothrist: Overslept Automotive Trend? – News,” get to text, February 22, 2023, <https://gettotext.com/300-jobs-lost-benteler-closes-plant-in-rothrist-overslept-automotive-trend-news/>; Harald Weber, “Benteler Steel/Tube Stands by Decision to Close Its Tube Plant in Rothrist, Switzerland,” News release, April 5, 2023, <https://www.benteler.com/en/press-media/news-and-press-releases/detail/BENTELER%20Steel/Tube%20stands%20by%20decision%20to%20close%20its%20tube%20plant%20in%20Rothrist,%20Switzerland/>; Rafael Hussy, “Benteler Steel/Tube Will Continue Production for a Longer Period of Time - But the Closure is a Done Deal,” September 18, 2023, Domestic interested parties’ response to NOI, p. 15; exh. 3; Domestic interested parties’ prehearing brief, p. 52, exh. 13.

Changes in operations

Producers in Switzerland were asked to report any change in the character of their operations or organization relating to the production of CDMT since January 1, 2017. Both responding producers indicated in their questionnaires that they had experienced such changes. Table IV-48 presents the changes identified by these producers.

Table IV-48

CDMT: Reported changes in operations in Switzerland, since January 1, 2017, by firm

Item	Firm name and narrative on changes in operations
Plant closings	***
Consolidations	***
Other	***

Source: Compiled from data submitted in response to Commission questionnaires.

The Commission asked foreign producers to report whether the COVID-19 pandemic or any government actions to contain the spread of the COVID-19 virus resulted in changes to the firm’s supply chain arrangements, production, and shipments relating to CDMT. The responding producers in Switzerland indicated that they had not experienced any such COVID-19-related changes.

Operations on CDMT

Table IV-49 presents data on the installed capacity, practical capacity, and production on the same equipment as reported by the responding producers of CDMT in Switzerland.³⁷

Table IV-49
CDMT: Swiss producers’ overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2017	2018	2019
Installed overall	Capacity	***	***	***
Installed overall	Production	***	***	***
Installed overall	Utilization	***	***	***
Practical overall	Capacity	***	***	***
Practical overall	Production	***	***	***
Practical overall	Utilization	***	***	***
Practical CDMT	Capacity	***	***	***
Practical CDMT	Production	***	***	***
Practical CDMT	Utilization	***	***	***

Table continued.

³⁷ None of the responding CDMT producers in Switzerland reported constraints in the manufacturing process.

Table IV-49 Continued
CDMT: Swiss producers' overall capacity and production on the same equipment as in-scope production, by period

Capacity and production in short tons; utilization in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Installed overall	Capacity	***	***	***	***	***
Installed overall	Production	***	***	***	***	***
Installed overall	Utilization	***	***	***	***	***
Practical overall	Capacity	***	***	***	***	***
Practical overall	Production	***	***	***	***	***
Practical overall	Utilization	***	***	***	***	***
Practical CDMT	Capacity	***	***	***	***	***
Practical CDMT	Production	***	***	***	***	***
Practical CDMT	Utilization	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Table IV-50 presents data on the CDMT operations of the responding producers in Switzerland. The reported annual capacity for CDMT production in Switzerland remained unchanged at *** short tons from 2017 to 2020, after which reported capacity declined as Jansen AG ceased production of CDMT in Switzerland and sold its facility to Mubea.³⁸ Practical CDMT capacity presented for interim 2023 compared with interim 2022, ***, remained constant.³⁹ Production initially increased from 2017 to 2018, but declined thereafter to a level in 2022 that was *** percent lower than that reported in 2017. Production was *** percent lower in interim 2023 than in interim 2022. Annual capacity utilization ranged from *** percent in 2020 to *** percent in 2018, and was lower at *** percent in interim 2023 than in interim 2022 at *** percent.

³⁸ In April 2021, CDMT producer Mubea purchased the two Jansen CDMT production facilities in Switzerland (Oberriet) and Germany (Dingelstätt). Approximately one year after the purchase of the Jansen facilities, Mubea reported an unsustainable capacity underutilization of the former Jansen Oberriet facility in Switzerland, citing an uncertain automotive parts supply business, and it realigned production among its facilities. By 2024, the former Jansen Oberriet facility is expected to be producing large-diameter steel pipes and steel profiles instead of CDMT. In the original investigations, Mubea and Jansen AG combined accounted for *** percent of CDMT production in Switzerland in 2016. Despite repeated attempts by staff to elicit a response, Mubea did not respond to the Commission's foreign producer questionnaire in these reviews.

³⁹ ***.

Table IV-50
CDMT: Data on industry in Switzerland, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export to the United States	Quantity	***	***	***
Export to the European Union	Quantity	***	***	***
Export Asia	Quantity	***	***	***
Export to all other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
Export to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export to the United States	Value	***	***	***
Export to the European Union	Value	***	***	***
Export Asia	Value	***	***	***
Export to all other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
Export to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-50 Continued
CDMT: Data on industry in Switzerland, by period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export to the United States	Quantity	***	***	***	***	***
Export to the European Union	Quantity	***	***	***	***	***
Export Asia	Quantity	***	***	***	***	***
Export to all other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
Export to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export to the United States	Value	***	***	***	***	***
Export to the European Union	Value	***	***	***	***	***
Export Asia	Value	***	***	***	***	***
Export to all other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
Export to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-50 Continued
CDMT: Data on industry in Switzerland, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export to the United States	Unit value	***	***	***
Export to the European Union	Unit value	***	***	***
Export Asia	Unit value	***	***	***
Export to all other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
Export to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export to the United States	Share	***	***	***
Export to the European Union	Share	***	***	***
Export Asia	Share	***	***	***
Export to all other markets	Share	***	***	***
Non-U.S. destination markets	Share	***	***	***
Export to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-50 Continued
CDMT: Data on industry in Switzerland, by period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export to the United States	Unit value	***	***	***	***	***
Export to the European Union	Unit value	***	***	***	***	***
Export Asia	Unit value	***	***	***	***	***
Export to all other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
Export to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export to the United States	Share	***	***	***	***	***
Export to the European Union	Share	***	***	***	***	***
Export Asia	Share	***	***	***	***	***
Export to all other markets	Share	***	***	***	***	***
Non-U.S. destination markets	Share	***	***	***	***	***
Export to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Export shipments accounted for almost the entirety of total shipments for the responding producers in Switzerland, with export shipments to the United States accounting for a steadily declining share of the total. As a share of total shipments, export shipments to the United States decreased from *** percent in 2017 to *** percent in 2022, and were lower at *** percent in interim 2023 compared with *** percent in interim 2022. Export shipments to the United States followed a similar downward trend in absolute quantities, decreasing from 2017 to 2022 to a level *** percent below that in 2017. The quantity of export shipments to the United States was *** lower in interim 2023 at *** short tons than at *** short tons in interim 2022. The quantity of export shipments to the European Union and Asia, which accounted for *** percent and *** percent, respectively, of total shipments during 2022, fluctuated downward from 2017 to 2022, and were lower in interim 2023 compared with interim 2022. Export shipments to other export destinations (primarily ***), which accounted for *** percent of total shipments in 2022, fluctuated upward from 2017 to 2022, but were lower in interim 2023 compared with interim 2022.

End-of-period inventories held by producers in Switzerland also trended irregularly downward overall, ending at *** percent lower in 2022 than in 2017 and *** percent lower in interim 2023 than in interim 2022.

Alternative products

One of the two responding producers in Switzerland (***) produced other products on the same equipment and machinery used to produce CDMT.⁴⁰ As shown in table IV-51, CDMT accounted for *** of total production on shared equipment during each of the periods examined during 2017-22 and January-June 2023.

Table IV-51

CDMT: Overall production on the same equipment as in-scope production in Switzerland, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2017	2018	2019
CDMT	Quantity	***	***	***
Other products	Quantity	***	***	***
Total production on same machinery	Quantity	***	***	***
CDMT	Share	***	***	***
Other products	Share	***	***	***
Total production on same machinery	Share	***	***	***

Table continued.

Table IV-51 Continued

CDMT: Overall production on the same equipment as in-scope production in Switzerland, by product type and period

Quantity in short tons; share in percent

Product type	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
CDMT	Quantity	***	***	***	***	***
Other products	Quantity	***	***	***	***	***
Total production on same machinery	Quantity	***	***	***	***	***
CDMT	Share	***	***	***	***	***
Other products	Share	***	***	***	***	***
Total production on same machinery	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

⁴⁰ Out-of-scope items include ***.

Exports

According to GTA, the leading export markets for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products, from Switzerland are Germany, the United States, and Spain (table IV-52). During 2022, the United States was the second-largest export market for certain cold-drawn tubes from Switzerland, accounting for 6.0 percent.

Table IV-52
Certain cold-drawn tubes: Exports from Switzerland, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2017	2018	2019
United States	Quantity	16	58	78
Germany	Quantity	703	685	603
Spain	Quantity	44	25	22
Austria	Quantity	27	28	18
Czech Republic	Quantity	6	7	4
Bulgaria	Quantity	0	2	8
Serbia	Quantity	0	15	3
Japan	Quantity	0	0	15
Kosovo	Quantity	0	30	7
All other destination markets	Quantity	45	215	64
Non-U.S. destination markets	Quantity	826	1,007	743
All destination markets	Quantity	842	1,065	821
United States	Value	102	167	312
Germany	Value	4,898	5,644	4,882
Spain	Value	103	66	55
Austria	Value	304	192	75
Czech Republic	Value	15	39	7
Bulgaria	Value	3	3	29
Serbia	Value	0	1	26
Japan	Value	2	0	73
Kosovo	Value	3	76	2
All other destination markets	Value	630	1,511	588
Non-U.S. destination markets	Value	5,957	7,532	5,736
All destination markets	Value	6,060	7,699	6,048

Table continued.

Table IV-52
Certain cold-drawn tubes: Exports from Switzerland, by destination market and by period

Quantity in short tons; value in 1,000 dollars

Destination market	Measure	2020	2021	2022
United States	Quantity	50	60	48
Germany	Quantity	568	632	647
Spain	Quantity	24	8	31
Austria	Quantity	14	15	16
Czech Republic	Quantity	3	14	11
Bulgaria	Quantity	---	3	7
Serbia	Quantity	1	2	5
Japan	Quantity	12	7	4
Kosovo	Quantity	6	7	4
All other destination markets	Quantity	32	49	13
Non-U.S. destination markets	Quantity	659	738	739
All destination markets	Quantity	709	798	786
United States	Value	106	229	431
Germany	Value	4,559	5,434	5,776
Spain	Value	59	25	77
Austria	Value	63	111	74
Czech Republic	Value	83	131	36
Bulgaria	Value	---	23	34
Serbia	Value	0	2	5
Japan	Value	37	158	24
Kosovo	Value	3	4	2
All other destination markets	Value	443	849	860
Non-U.S. destination markets	Value	5,249	6,739	6,888
All destination markets	Value	5,355	6,968	7,319

Table continued.

Table IV-52**Certain cold-drawn tubes: Exports from Switzerland, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2017	2018	2019
United States	Unit value	6,574	2,874	4,009
Germany	Unit value	6,964	8,241	8,095
Spain	Unit value	2,330	2,634	2,515
Austria	Unit value	11,223	6,961	4,155
Czech Republic	Unit value	2,526	5,531	1,768
Bulgaria	Unit value	12,793	1,641	3,572
Serbia	Unit value	6,260	40	9,669
Japan	Unit value	45,868	62,466	4,837
Kosovo	Unit value	8,249	2,522	269
All other destination markets	Unit value	13,910	7,010	9,255
Non-U.S. destination markets	Unit value	7,210	7,479	7,722
All destination markets	Unit value	7,198	7,228	7,369
United States	Share of quantity	1.8	5.4	9.5
Germany	Share of quantity	83.6	64.3	73.5
Spain	Share of quantity	5.2	2.4	2.7
Austria	Share of quantity	3.2	2.6	2.2
Czech Republic	Share of quantity	0.7	0.7	0.5
Bulgaria	Share of quantity	0.0	0.2	1.0
Serbia	Share of quantity	0.0	1.4	0.3
Japan	Share of quantity	0.0	0.0	1.8
Kosovo	Share of quantity	0.0	2.8	0.8
All other destination markets	Share of quantity	5.4	20.2	7.7
Non-U.S. destination markets	Share of quantity	98.2	94.6	90.5
All destination markets	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-52**Certain cold-drawn tubes: Exports from Switzerland, by destination market and by period**

Unit value in dollars per short ton; share in percent

Destination market	Measure	2020	2021	2022
United States	Unit value	2,144	3,811	9,058
Germany	Unit value	8,032	8,597	8,930
Spain	Unit value	2,487	3,140	2,481
Austria	Unit value	4,641	7,408	4,612
Czech Republic	Unit value	27,105	9,200	3,346
Bulgaria	Unit value	---	7,235	4,728
Serbia	Unit value	156	1,028	1,028
Japan	Unit value	3,211	22,284	5,356
Kosovo	Unit value	573	595	574
All other destination markets	Unit value	13,854	17,380	64,029
Non-U.S. destination markets	Unit value	7,963	9,126	9,325
All destination markets	Unit value	7,557	8,726	9,309
United States	Share of quantity	7.0	7.5	6.0
Germany	Share of quantity	80.1	79.2	82.3
Spain	Share of quantity	3.4	1.0	4.0
Austria	Share of quantity	1.9	1.9	2.0
Czech Republic	Share of quantity	0.4	1.8	1.4
Bulgaria	Share of quantity	---	0.4	0.9
Serbia	Share of quantity	0.2	0.3	0.6
Japan	Share of quantity	1.6	0.9	0.6
Kosovo	Share of quantity	0.9	0.9	0.5
All other destination markets	Share of quantity	4.5	6.1	1.7
Non-U.S. destination markets	Share of quantity	93.0	92.5	94.0
All destination markets	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by Swiss Customs in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the top exporting countries in descending order of 2022 data.

Subject countries combined

Table IV-53 presents summary data on CDMT operations of the reporting subject producers in the subject countries combined.

Table IV-53
CDMT: Data on the industry in subject countries, by item and period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2017	2018	2019
Capacity	Quantity	***	***	***
Production	Quantity	***	***	***
End-of-period inventories	Quantity	***	***	***
Internal consumption and transfers	Quantity	***	***	***
Commercial home market shipments	Quantity	***	***	***
Home market shipments	Quantity	***	***	***
Export to the United States	Quantity	***	***	***
Export to the European Union	Quantity	***	***	***
Export Asia	Quantity	***	***	***
Export to all other markets	Quantity	***	***	***
Non-U.S. destination markets	Quantity	***	***	***
Export to all markets	Quantity	***	***	***
Total shipments	Quantity	***	***	***
Internal consumption and transfers	Value	***	***	***
Commercial home market shipments	Value	***	***	***
Home market shipments	Value	***	***	***
Export to the United States	Value	***	***	***
Export to the European Union	Value	***	***	***
Export Asia	Value	***	***	***
Export to all other markets	Value	***	***	***
Non-U.S. destination markets	Value	***	***	***
Export to all markets	Value	***	***	***
Total shipments	Value	***	***	***

Table continued.

Table IV-53 Continued
CDMT: Data on the industry in subject countries, by item and period

Quantity in short tons; value in 1,000 dollars

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Capacity	Quantity	***	***	***	***	***
Production	Quantity	***	***	***	***	***
End-of-period inventories	Quantity	***	***	***	***	***
Internal consumption and transfers	Quantity	***	***	***	***	***
Commercial home market shipments	Quantity	***	***	***	***	***
Home market shipments	Quantity	***	***	***	***	***
Export to the United States	Quantity	***	***	***	***	***
Export to the European Union	Quantity	***	***	***	***	***
Export Asia	Quantity	***	***	***	***	***
Export to all other markets	Quantity	***	***	***	***	***
Non-U.S. destination markets	Quantity	***	***	***	***	***
Export to all markets	Quantity	***	***	***	***	***
Total shipments	Quantity	***	***	***	***	***
Internal consumption and transfers	Value	***	***	***	***	***
Commercial home market shipments	Value	***	***	***	***	***
Home market shipments	Value	***	***	***	***	***
Export to the United States	Value	***	***	***	***	***
Export to the European Union	Value	***	***	***	***	***
Export Asia	Value	***	***	***	***	***
Export to all other markets	Value	***	***	***	***	***
Non-U.S. destination markets	Value	***	***	***	***	***
Export to all markets	Value	***	***	***	***	***
Total shipments	Value	***	***	***	***	***

Table continued.

Table IV-53 Continued
CDMT: Data on the industry in subject countries, by item and period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2017	2018	2019
Internal consumption and transfers	Unit value	***	***	***
Commercial home market shipments	Unit value	***	***	***
Home market shipments	Unit value	***	***	***
Export to the United States	Unit value	***	***	***
Export to the European Union	Unit value	***	***	***
Export Asia	Unit value	***	***	***
Export to all other markets	Unit value	***	***	***
Non-U.S. destination markets	Unit value	***	***	***
Export to all markets	Unit value	***	***	***
Total shipments	Unit value	***	***	***
Capacity utilization ratio	Ratio	***	***	***
Inventory ratio to production	Ratio	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***
Internal consumption and transfers	Share	***	***	***
Commercial home market shipments	Share	***	***	***
Home market shipments	Share	***	***	***
Export to the United States	Share	***	***	***
Export to the European Union	Share	***	***	***
Export Asia	Share	***	***	***
Export to all other markets	Share	***	***	***
Non-U.S. destination markets	Share	***	***	***
Export to all markets	Share	***	***	***
Total shipments	Share	***	***	***

Table continued.

Table IV-53 Continued
CDMT: Data on the industry in subject countries, by item and period

Unit value in dollars per short ton; ratio and share in percent

Item	Measure	2020	2021	2022	Jan-Jun 2022	Jan-Jun 2023
Internal consumption and transfers	Unit value	***	***	***	***	***
Commercial home market shipments	Unit value	***	***	***	***	***
Home market shipments	Unit value	***	***	***	***	***
Export to the United States	Unit value	***	***	***	***	***
Export to the European Union	Unit value	***	***	***	***	***
Export Asia	Unit value	***	***	***	***	***
Export to all other markets	Unit value	***	***	***	***	***
Non-U.S. destination markets	Unit value	***	***	***	***	***
Export to all markets	Unit value	***	***	***	***	***
Total shipments	Unit value	***	***	***	***	***
Capacity utilization ratio	Ratio	***	***	***	***	***
Inventory ratio to production	Ratio	***	***	***	***	***
Inventory ratio to total shipments	Ratio	***	***	***	***	***
Internal consumption and transfers	Share	***	***	***	***	***
Commercial home market shipments	Share	***	***	***	***	***
Home market shipments	Share	***	***	***	***	***
Export to the United States	Share	***	***	***	***	***
Export to the European Union	Share	***	***	***	***	***
Export Asia	Share	***	***	***	***	***
Export to all other markets	Share	***	***	***	***	***
Non-U.S. destination markets	Share	***	***	***	***	***
Export to all markets	Share	***	***	***	***	***
Total shipments	Share	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Tables IV-54 and IV-55 and figures IV-6 and IV-7 present data on responding subject country producers' total shipments of CDMT by end use and product type in 2022.

The largest share of end use type reported by subject producers was the automotive end use, accounting for *** percent of subject producers' total shipments, followed by heavy machinery/industrial end uses, accounting for *** percent of total shipments. The overwhelming majority of subject producers' total shipments of CDMT in 2022 were of carbon steel welded and carbon steel seamless, together accounting for *** percent of subject producers' total shipments.

Table IV-54
CDMT: Subject country producers' total shipments, by source and end use sector, 2022

Quantity in short tons

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses / sectors	All sectors
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***

Table continued.

Table IV-54 Continued
CDMT: Subject country producers' total shipments, by source and end use sector, 2022

Share across in percent

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses / sectors	All sectors
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***

Table continued.

Table IV-54 Continued

CDMT: Subject country producers' total shipments, by source and end use sector, 2022

Share down in percent

Source	Agriculture	Automotive	Heavy machinery/ industrial	Oil and gas	Other end uses / sectors	All sectors
China	***	***	***	***	***	***
Germany	***	***	***	***	***	***
India	***	***	***	***	***	***
Italy	***	***	***	***	***	***
South Korea	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as “0.0” percent represent non-zero values less than “0.05” percent (if positive) and greater than “(0.05)” percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as “---”.

Figure IV-6

CDMT: Subject country producers' total shipments, by source and end use sector, 2022

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Table IV-55**CDMT: Subject country producers' total shipments, by source and type of pipe, 2022**

Quantity in short tons

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***

Table continued.

Table IV-55 Continued**CDMT: Subject country producers' total shipments, by source and type of pipe, 2022**

Share across in percent

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***

Table continued.

Table IV-55 Continued**CDMT: Subject country producers' total shipments, by source and type of pipe, 2022**

Share down in percent

Source	Carbon steel welded pipe	Carbon steel seamless pipe	Alloy steel welded pipe	Alloy steel seamless pipe	All pipe types
China	***	***	***	***	***
Germany	***	***	***	***	***
India	***	***	***	***	***
Italy	***	***	***	***	***
South Korea	***	***	***	***	***
Switzerland	***	***	***	***	***
Subject sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---".

Figure IV-7
CDMT: Subject country producers' total shipments, by source and type of pipe, 2022

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Third-country trade actions

Based on available information, carbon and alloy steel pipes and tubes, that may also include CDMT, were subject to other antidumping (“AD”) or countervailing duty (“CVD”) investigations outside the United States (table IV-56).

Table IV-56
Carbon and alloy steel pipes and tubes: Third country trade actions, since January 1, 2017

Third countries and subject products	Subject countries	Action date	AD or CVD action
Australia: Precision pipe and tube steel (HS codes 7306.30, 7306.50, 7306.61)	China and South Korea	September 2021	Final AD duty rates: 2.9–19.7 percent ad valorem (China). Final CVD rate: 42.7 percent ad valorem (China). Final AD duty rate: 6.2 percent ad valorem (South Korea).
Australia: Precision pipe and tube steel (HS codes 7306.30, 7306.50, 7306.61)	China and South Korea	August 2022	Exemption inquiry exempted the subject products from the previously imposed import-injury orders, retroactive to September 2021.
Australia: Hollow structural sections (HS codes 7306.30.00, 7306.50.00, 7306.61.00, 7306.69.00, 7306.90.00)	China and South Korea	July 2022	Sunset review continued the import-injury orders: AD duty rates: 1.0–30.4 percent ad valorem (China); CVD rate: 3.3–26.3 percent ad valorem (China); and AD duty rate: 13.8 percent ad valorem (South Korea).
Brazil: Seamless carbon steel tubes (HS codes 7304.31.10, 7304.31.90, 7304.39.10, 7304.39.20, 7304.39.90)	China	July 2022	Sunset review continued the import-injury orders. AD duty rates: US\$1,009.29 per metric ton (\$915.61 per short ton) to US\$1,356.90 per metric ton (\$1,230.96 per short ton).
Canada: Certain steel piling pipe (HS codes 7306.30.00, 7306.40.00, 7306.50.00)	China	January 2018	Normal value review results: AD duty rate: 96.4 percent ad valorem; and CVD rate: 641.35 renminbi per kilogram (581,822.93 renminbi per short ton)
Canada: Certain carbon steel welded pipe (HS code 7306.30.00)	China	November 2018	Expiry review continued the import injury orders: AD duty rate: 179 percent ad valorem; and CVD rate: 5,280 renminbi per metric ton (4,790 renminbi per short ton).
Canada: Certain carbon steel welded pipe (HS code 7306.30.00)	India and South Korea	May 2018	Expiry review continued the import injury orders: AD duty rate: 54.2 percent ad valorem (India and South Korea); and CVD rate: 23,872 rupees per metric ton (21,656 rupees per short ton) (India).

Table continued.

Table IV-56 Continued

Carbon and alloy steel pipes and tubes: Third country trade actions, since January 1, 2017

Third countries and subject products	Subject countries	Action date	AD or CVD action
India: Seamless tubes, pipes and hollow profile of iron (HS code 7304)	China	July 2021	The affirmative measure was not extended. Although the AD order was terminated, the AD duty remained in force pending the outcome of the review. The measure was extended up to October 2021.
Thailand: Certain iron or steel pipe and tube products (HS codes 7305.11, 7306.19, 7306.50, 7306.61, 7306.69, 7306.90)	China and South Korea	April 2017 July 2022	Prior expiry review continued the import injury orders: AD duty rates: 3.22–66.01 percent ad valorem (China); and AD duty rates: 3.49–53.88 percent ad valorem (South Korea). Current expiry review initiated.
Turkey: Seamless cold drawn steel pipe and tube (HS codes 7304.19.10, 7304.31.20, 7304.31.80, 7304.39.82, 7304.51.10, 7304.51.81, 7304.51.89, 7304.59.30, 7304.59.82, 7304.90.00)	China	July 2022	Sunset review continued the import injury orders: AD duty rates: \$55.00–\$75.00 per metric ton (\$49.90–\$68.04 per short ton).
Turkey: Seamless tubes, pipes and hollow profiles of iron, other than cast iron or steel (HS code 7304.19.10, 7304.31.20, 7304.31.80, 7304.39.82, 7304.51.10, 7304.51.81, 7304.51.89, 7304.59.30, 7304.59.82, 7304.90.00)	China	July 2021	Expiry review continued the AD duty orders.
United Kingdom (“UK”): Welded tubes and pipes of iron or non-alloy steel (HS codes 7306.30.41, 7306.30.49, 7306.30.72, 7306.30.77)	China	July 2021	Transition review AD orders: 90.6 percent ad valorem. The European Commission issued this AD order of January 2015, which transitioned to the UK after it was no longer a member of the European Union.
Ukraine: Steel seamless cold drawn and cold rolled pipes (HS codes 7304.31.00, 7304.51.00)	China	September 2021	AD investigation initiated.

Source: Global Trade Alert (“GTA”), “Australia: Definitive Anti-dumping Duties on Imports of Precision Pipe and Tube Steel from China and the Republic of Korea, and Countervailing Duties on Imports from China. Termination of Investigation on Imports from Chinese Taipei and Vietnam,” GTA Intervention No. 79031, <https://www.globaltradealert.org/intervention/79031/anti-dumping/australia-definitive-anti-dumping-duties-on-imports-of-precision-pipe-and-tube-steel-from-china-and-the-republic-of-korea-and-countervailing-duties-on-imports-from-china-termination-of-investigation-on-imports-from-chinese-taipei-and-vietnam>, retrieved March 7, 2023; Australia, Anti-Dumping Commission, “Precision Pipe and Tube

Table IV-56 Continued**Carbon and alloy steel pipes and tubes: Third country trade actions, since January 1, 2017**

Steel Exported to Australia from the People's Republic of China, the Republic of Korea, Taiwan and the Socialist Republic of Vietnam Findings in Relation to a Dumping Investigation," Anti-Dumping Notice No. 2021/109, September 28, 2021, https://www.industry.gov.au/sites/default/files/adc/public-record/550_-_072_-_notice_adn_-_adn_2021-109_-_findings_in_relation_to_a_dumping_investigation.pdf; Australia, Anti-Dumping Commission, "Precision Pipe and Tube Steel Exported to Australia from the People's Republic of China and the Socialist Republic of Vietnam, Findings in Relation to a Subsidisation Investigation," Anti-Dumping Notice (ADN) No. 2021/110, September 28, 2021, https://www.industry.gov.au/sites/default/files/adc/public-record/550_-_073_notice_adn_-_adn_2021-110_-_findings_in_relation_to_a_subsidation_investigation.pdf; SteelOrbis, "Australia Removes AD Duties on Precision Pipe from China and S. Korea," August 16, 2022, <https://www.steelorbis.com/steel-news/latest-news/australia-removes-ad-duties-on-precision-pipe-from-china-and-s-korea-1256429.htm>; SteelOrbis, "Australia to Continue AD and CVD Orders on Hollow Structural Sections from Certain Countries," July 6, 2022, <https://www.steelorbis.com/steel-news/latest-news/australia-to-continue-ad-and-cvd-orders-on-hollow-structural-sections-from-certain-countries-1251300.htm>; SteelOrbis, "Australia Initiates AD and CVD Reviews on Hollow Structural Section from Certain Countries," September 27, 2021, <https://www.steelorbis.com/steel-news/latest-news/australia-initiates-ad-and-cvd-reviews-on-hollow-structural-section-from-certain-countries-1216661.htm>; GTA, "Brazil: Extension of definitive antidumping duty on imports of certain types of carbon steel pipes and tubes from China," GTA Intervention No. 20643, <https://www.globaltradealert.org/intervention/20643/anti-dumping/brazil-extension-of-definitive-antidumping-duty-on-imports-of-certain-types-of-carbon-steel-pipes-and-tubes-from-china#:~:text=On%2020%20July%202022%2C%20the%20conclusion%20of%20the%20sunset%20review>, retrieved March 7, 2023; Canada Border Service Agency ("CBSA"), "Certain Piling Pipe, Dumping & subsidizing (China)," March 2, 2022, <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/pp-eng.html>; CBSA, "Carbon Steel Welded Pipe (CSWP 1) Dumping & Subsidizing (China)," December 8, 2021, <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp1-eng.html>; CBSA, "Carbon Steel Welded Pipe (CSWP 2) Dumping (Chinese Taipei, India, Oman, South Korea, Thailand and United Arab Emirates) & subsidizing (India)," May 11, 2022, <https://www.cbsa-asfc.gc.ca/sima-lmsi/mif-mev/cswp2-eng.html>; SteelOrbis, "India Extends AD Duty on Seamless Tube Imports from China Until October 31 Pending Final Review," May 10, 2021, <https://www.steelorbis.com/steel-news/latest-news/india-extends-ad-duty-on-seamless-tube-imports-from-china-until-oct-31-pending-final-review-1199121.htm>; Government of India, "Semi-annual Report Under Article 16.4 of the Agreement for the Period 1 July-31 December 2021," WTO Doc No. 22-7741, G/ADP/N/364/IND/Rev.1, October 14, 2022, p. 22, <https://docs.wto.org/dol2fe/Pages/SS/directdoc.aspx?filename=q:/G/ADP/N364INDR1.pdf&Open=True>; Thailand, Ministry of Commerce, Trade Interests and Remedies Division, "Details of Measures, Certain Iron or Steel Pipe and Tube Originating in the People's Republic of China and the Republic of Korea," <https://www.thaitr.go.th/en/search/AD1032>, retrieved March 7, 2023; SteelOrbis, "Turkey Lowers AD Duties on Seamless Pipe from China," July 14, 2022, <https://www.steelorbis.com/steel-news/latest-news/turkey-lowers-ad-duties-on-seamless-pipe-from-china-1252180.htm>; GTA, "Turkey: Extension of Definitive Anti-dumping Duty on Imports of Seamless Tubes, Pipes and Hollow Profiles of Iron (Other Than Cast Iron) or Steel from China," GTA Intervention No. 20158, <https://www.globaltradealert.org/intervention/20158/anti-dumping/turkey-definitive-antidumping-duty-on-imports-of-seamless-tubes-pipes-and-hollow-profiles-of-iron-other-than-cast-iron-or-steel-from-china>, retrieved March 8, 2023; Turkey, Ministry of Commerce, "Communique on Prevention of Unfair Competition in Imports," Communique No. 2022/19, Official Newspaper, July 9, 2022, <https://www.resmigazete.gov.tr/eskiler/2022/07/20220709-3.htm>; Eurometal, "UK Maintains AD Duties on China, Belarus Welded Tubes and Pipes," May 17, 2021, <https://eurometal.net/uk-maintains-ad-duties-on-china-belarus-welded-tubes-and-pipes/>; SteelOrbis, "Ukraine Starts AD Probe of Ex-China on Seamless Cold-drawn and CR Pipes," September 9, 2021, <https://www.steelorbis.com/steel-news/latest-news/ukraine-starts-ad-duty-probe-on-ex-china-seamless-cold-drawn-and-cr-pipes-1214549.htm>.

Global market

There is limited nonsubject country information available that is specific to CDMT. Table IV-57 presents global export data for certain cold-drawn tubes, a category that includes CDMT and out-of-scope products (by exporter in descending order of quantity for 2022, except for the United States which is presented at the top).

Table IV-57
Certain cold-drawn tubes: Global exports, by reporting country and by period

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2017	2018	2019
United States	Quantity	27,519	32,163	16,844
China	Quantity	242,871	241,957	246,203
Germany	Quantity	167,911	183,745	161,230
India	Quantity	13,489	19,221	14,393
Italy	Quantity	66,969	85,963	75,941
South Korea	Quantity	47,169	46,834	34,159
Switzerland	Quantity	842	1,065	821
Subject exporters	Quantity	539,251	578,785	532,747
Romania	Quantity	56,097	62,220	61,695
Slovakia	Quantity	52,345	52,919	53,914
France	Quantity	61,490	61,500	44,638
Japan	Quantity	54,586	54,592	45,468
Netherlands	Quantity	18,038	20,658	22,359
Spain	Quantity	22,843	20,994	17,118
All other exporters	Quantity	256,661	264,143	226,354
All reporting exporters	Quantity	1,088,830	1,147,974	1,021,137
United States	Value	114,653	136,332	68,834
China	Value	293,963	338,305	344,903
Germany	Value	386,134	455,951	396,145
India	Value	19,014	28,960	23,478
Italy	Value	129,555	185,059	160,344
South Korea	Value	96,608	90,833	54,111
Switzerland	Value	6,060	7,699	6,048
Subject exporters	Value	931,333	1,106,806	985,029
Romania	Value	100,835	124,734	120,578
Slovakia	Value	82,302	96,921	90,821
France	Value	134,401	148,258	119,662
Japan	Value	134,905	123,670	106,126
Netherlands	Value	51,105	59,844	63,995
Spain	Value	75,307	79,096	63,684
All other exporters	Value	386,979	445,716	394,308
All reporting exporters	Value	2,011,821	2,321,378	2,013,039

Table continued.

Table IV-57 Continued**Certain cold-drawn tubes: Global exports, by reporting country and by period**

Quantity in short tons; value in 1,000 dollars

Exporting country	Measure	2020	2021	2022
United States	Quantity	15,258	17,345	17,679
China	Quantity	257,783	252,984	328,105
Germany	Quantity	120,966	166,636	175,322
India	Quantity	9,163	15,994	22,918
Italy	Quantity	53,707	71,981	82,312
South Korea	Quantity	18,594	24,616	38,314
Switzerland	Quantity	709	798	786
Subject exporters	Quantity	460,922	533,009	647,756
Romania	Quantity	53,077	66,877	64,365
Slovakia	Quantity	42,290	51,792	56,614
France	Quantity	33,157	43,016	49,227
Japan	Quantity	32,953	35,280	29,201
Netherlands	Quantity	13,730	15,166	24,988
Spain	Quantity	14,725	20,291	23,835
All other exporters	Quantity	202,385	183,289	108,624
All reporting exporters	Quantity	868,498	966,065	1,022,289
United States	Value	60,824	64,083	76,557
China	Value	319,464	374,032	567,246
Germany	Value	298,184	456,900	547,618
India	Value	16,239	23,678	42,844
Italy	Value	110,302	160,692	222,634
South Korea	Value	34,450	48,621	81,014
Switzerland	Value	5,355	6,968	7,319
Subject exporters	Value	783,994	1,070,890	1,468,675
Romania	Value	96,815	132,556	177,522
Slovakia	Value	68,972	101,076	144,008
France	Value	85,144	117,512	136,754
Japan	Value	85,172	98,772	83,857
Netherlands	Value	53,930	62,825	80,445
Spain	Value	53,776	73,971	89,343
All other exporters	Value	338,679	468,536	408,836
All reporting exporters	Value	1,627,307	2,190,222	2,665,995

Table continued.

Table IV-57 Continued
Certain cold-drawn tubes: Global exports, by reporting country and by period

Unit value in dollars per short ton; share in percent

Exporting country	Measure	2017	2018	2019
United States	Unit value	4,166	4,239	4,086
China	Unit value	1,210	1,398	1,401
Germany	Unit value	2,300	2,481	2,457
India	Unit value	1,410	1,507	1,631
Italy	Unit value	1,935	2,153	2,111
South Korea	Unit value	2,048	1,939	1,584
Switzerland	Unit value	7,198	7,228	7,369
Subject exporters	Unit value	1,727	1,912	1,849
Romania	Unit value	1,798	2,005	1,954
Slovakia	Unit value	1,572	1,832	1,685
France	Unit value	2,186	2,411	2,681
Japan	Unit value	2,471	2,265	2,334
Netherlands	Unit value	2,833	2,897	2,862
Spain	Unit value	3,297	3,768	3,720
All other exporters	Unit value	1,508	1,687	1,742
All reporting exporters	Unit value	1,848	2,022	1,971
United States	Share of quantity	2.5	2.8	1.6
China	Share of quantity	22.3	21.1	24.1
Germany	Share of quantity	15.4	16.0	15.8
India	Share of quantity	1.2	1.7	1.4
Italy	Share of quantity	6.2	7.5	7.4
South Korea	Share of quantity	4.3	4.1	3.3
Switzerland	Share of quantity	0.1	0.1	0.1
Subject exporters	Share of quantity	49.5	50.4	52.2
Romania	Share of quantity	5.2	5.4	6.0
Slovakia	Share of quantity	4.8	4.6	5.3
France	Share of quantity	5.6	5.4	4.4
Japan	Share of quantity	5.0	4.8	4.5
Netherlands	Share of quantity	1.7	1.8	2.2
Spain	Share of quantity	2.1	1.8	1.7
All other exporters	Share of quantity	23.6	23.0	22.2
All reporting exporters	Share of quantity	100.0	100.0	100.0

Table continued.

Table IV-57 Continued
Certain cold-drawn tubes: Global exports, by reporting country and by period

Unit value in dollars per short ton; share in percent

Exporting country	Measure	2020	2021	2022
United States	Unit value	3,986	3,695	4,330
China	Unit value	1,239	1,478	1,729
Germany	Unit value	2,465	2,742	3,124
India	Unit value	1,772	1,480	1,869
Italy	Unit value	2,054	2,232	2,705
South Korea	Unit value	1,853	1,975	2,114
Switzerland	Unit value	7,557	8,726	9,309
Subject exporters	Unit value	1,701	2,009	2,267
Romania	Unit value	1,824	1,982	2,758
Slovakia	Unit value	1,631	1,952	2,544
France	Unit value	2,568	2,732	2,778
Japan	Unit value	2,585	2,800	2,872
Netherlands	Unit value	3,928	4,142	3,219
Spain	Unit value	3,652	3,646	3,748
All other exporters	Unit value	1,673	2,556	3,764
All reporting exporters	Unit value	1,874	2,267	2,608
United States	Share of quantity	1.8	1.8	1.7
China	Share of quantity	29.7	26.2	32.1
Germany	Share of quantity	13.9	17.2	17.1
India	Share of quantity	1.1	1.7	2.2
Italy	Share of quantity	6.2	7.5	8.1
South Korea	Share of quantity	2.1	2.5	3.7
Switzerland	Share of quantity	0.1	0.1	0.1
Subject exporters	Share of quantity	53.1	55.2	63.4
Romania	Share of quantity	6.1	6.9	6.3
Slovakia	Share of quantity	4.9	5.4	5.5
France	Share of quantity	3.8	4.5	4.8
Japan	Share of quantity	3.8	3.7	2.9
Netherlands	Share of quantity	1.6	1.6	2.4
Spain	Share of quantity	1.7	2.1	2.3
All other exporters	Share of quantity	23.3	19.0	10.6
All reporting exporters	Share of quantity	100.0	100.0	100.0

Source: Official exports statistics under HS subheadings 7304.31 and 7304.51 as reported by various national statistical authorities in the S&P Global Market Intelligence, Global Trade Atlas Suite database, accessed October 14, 2023.

Note: These data may be overstated as HS subheadings 7304.31 and 7304.51 may contain products outside the scope of these reviews. These data also do not include HS subheadings 7306.30 and 7306.50 as they are believed to contain a large share of products outside the scope of these reviews.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. Zeroes, null values, and undefined calculations are suppressed and shown as "---". United States is shown at the top followed by the countries under order, all remaining top exporting countries in descending order of 2022 data.

Part V: Pricing data

Factors affecting prices

Raw material and energy costs

The feedstock for CDMT may be from a mother tube or redraw hollow, which is an unfinished carbon and alloy steel hollow profile, which could be an as-welded tube or a hot-finished seamless tube.¹ These tubes are produced from hot-rolled steel sheet, bar, or billet. As shown in figure V-1 and table V-1, hot-rolled coil prices increased during the first half of 2018, and steadily declined through July 2020, at which point prices sharply increased, more than doubling by October 2021. Since then, prices have fluctuated downwards, albeit with prices in August 2023 still approximately 25 percent higher than in January 2017.

U.S. producers' raw materials as a share of cost of goods sold increased from 54.7 percent in 2017 to 66.7 percent in 2022 (see part III). All six U.S. producers and 15 of 18 responding importers reported that raw material costs have increased since 2017, citing primarily steel price increases and inflation, as well as the Section 232 tariffs, antidumping duties, and the 2022 Ukraine war supply crisis. Firms' responses were mixed regarding anticipated raw material costs trends. Three U.S. producers anticipate raw material costs will fluctuate down, two anticipate they will fluctuate up, and one anticipates no change while seven importers anticipate raw material costs will fluctuate up, five anticipate no change, four anticipate they will fluctuate down and two anticipate they will steadily increase.

¹ U.S. producers use domestic and imported feedstock for production of CDMT. Cold-Drawn Mechanical Tubing from China, Germany, India, Italy, South Korea, and Switzerland, Inv. Nos. 701-TA-576-577 and 731-TA-1362-1367 (Final), USITC Publication 4755, January 2018, p. V-1.

Figure V-1
Hot-rolled coil: ***

* * * * *

Source: ***, various monthly issues.

Table V-1
Hot-rolled coil: ***

Prices in dollars per short ton

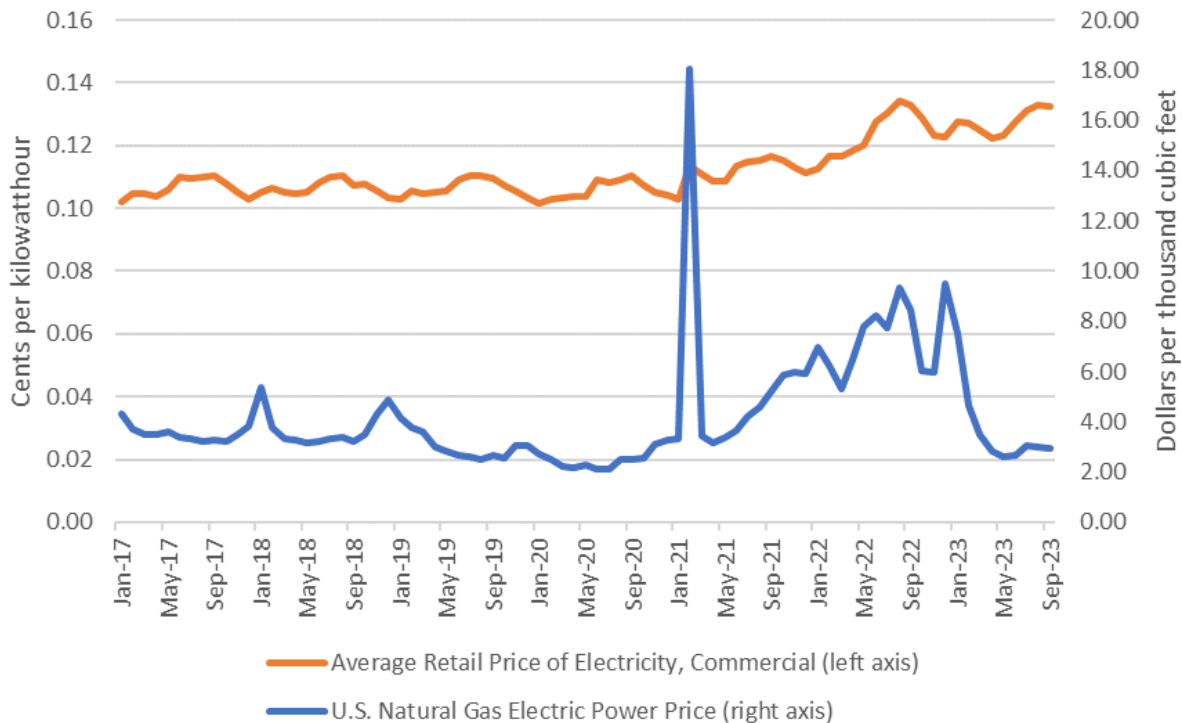
Month	2017	2018	2019	2020	2021	2022	2023
January	***	***	***	***	***	***	***
February	***	***	***	***	***	***	***
March	***	***	***	***	***	***	***
April	***	***	***	***	***	***	***
May	***	***	***	***	***	***	***
June	***	***	***	***	***	***	***
July	***	***	***	***	***	***	***
August	***	***	***	***	***	***	***
September	***	***	***	***	***	***	---
October	***	***	***	***	***	***	---
November	***	***	***	***	***	***	---
December	***	***	***	***	***	***	---

Source: ***, various monthly issues.

Energy costs are another important factor in CDMT production. The price of both electricity and natural gas fluctuated during January 2017 to September 2023 (figure V-2 and tables V-2 and V-3). There was a spike in the price of natural gas in February 2021 due to a

winter storm which increased natural gas consumption and disrupted energy supplies. Production of natural gas in Texas was reduced by half due to inclement conditions that caused well freeze-offs.² Natural gas prices also rose in 2022 but have fallen in 2023, with an overall decline by 32 percent from January 2017 to September 2023. Electricity prices fluctuated within a relatively consistent range during 2017-20, increased irregularly from January 2021 to September 2023, and increased overall by nearly 30 percent.

Figure V-2
Energy prices: U.S. natural gas electric power price and average retail price of commercial electricity, monthly, January 2017-September 2023



Source: U.S. Energy Information Administration, <https://www.eia.gov/dnav/ng/hist/n3045us3m.htm> and <https://www.eia.gov/electricity/data/browser/#/topic/7?agg=0,1&geo=g&endsec=vg&linechart=~&freq=M&start=201701&end=202309&ctype=linechart&itype=pin&rtype=s&pin=&rse=0&maptype=0>, accessed December 1, 2023.

² U.S. Energy Information Administration, <https://www.eia.gov/todayinenergy/detail.php?id=50778>, accessed December 1, 2023.

Table V-2
Energy prices: U.S. natural gas electric power price, monthly, January 2017-September 2023

Prices in dollar per 1,000 cubic feet

Month	2017	2018	2019	2020	2021	2022	2023
January	4.31	5.38	4.16	2.74	3.33	6.97	7.52
February	3.72	3.75	3.78	2.50	16.29	6.26	4.64
March	3.51	3.32	3.60	2.23	3.40	5.32	3.51
April	3.50	3.26	2.99	2.20	3.14	6.45	2.81
May	3.61	3.16	2.85	2.26	3.35	7.79	2.63
June	3.40	3.23	2.66	2.10	3.57	8.23	2.67
July	3.32	3.35	2.63	2.14	4.12	7.76	3.07
August	3.24	3.39	2.50	2.50	4.45	9.33	3.02
September	3.27	3.23	2.68	2.49	5.09	8.46	2.95
October	3.24	3.52	2.58	2.58	5.75	6.03	---
November	3.50	4.34	3.08	3.09	5.89	5.96	---
December	3.81	4.89	3.04	3.30	5.15	9.53	---

Source: U.S. Energy Information Administration, <https://www.eia.gov/dnav/ng/hist/n3045us3m.htm>, accessed December 1, 2023.

Table V-3
Energy prices: U.S. average retail price of electricity, commercial, monthly, January 2017-September 2023

Prices in cents per kilowatt hour

Month	2017	2018	2019	2020	2021	2022	2023
January	10.21	10.49	10.30	10.18	10.27	11.26	12.75
February	10.48	10.65	10.54	10.30	11.36	11.66	12.70
March	10.46	10.51	10.46	10.34	11.08	11.65	12.48
April	10.40	10.46	10.52	10.37	10.87	11.82	12.21
May	10.59	10.51	10.54	10.40	10.86	12.00	12.32
June	11.01	10.84	10.90	10.89	11.33	12.75	12.77
July	10.97	11.00	11.02	10.84	11.46	13.02	13.10
August	11.01	11.03	11.02	10.90	11.52	13.41	13.27
September	11.03	10.72	10.96	11.02	11.65	13.28	13.25
October	10.78	10.77	10.74	10.72	11.52	12.89	---
November	10.49	10.54	10.57	10.53	11.29	12.33	---
December	10.28	10.33	10.32	10.41	11.15	12.28	---

Source: U.S. Energy Information Administration, <https://www.eia.gov/electricity/data/browser/#/topic/?agg=0,1&geo=g&endsec=vg&linechart=~&freq=M&start=201701&end=202309&ctype=linechart&itype=pin&rtype=s&pin=&rse=0&maptype=0>, accessed December 1, 2023.

Transportation costs to the U.S. market

Transportation costs for CDMT shipped from subject countries to the United States averaged 8.7 percent for China, 5.7 percent for Germany, 8.9 percent for India, 11.0 percent for Italy, 21.4 percent for South Korea, 8.3 percent for Switzerland during 2022. These estimates were derived from official import data and represent the transportation and other charges on imports.³

U.S. inland transportation costs

Three U.S. producers and 14 importers reported that they typically arrange transportation to their customers while three U.S. producers and 6 importers reported their purchasers arrange transportation. Most U.S. producers reported that their U.S. inland transportation costs ranged from 1 to 5 percent while most responding importers reported costs of 1 to 10 percent.

Pricing practices

Pricing methods

Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, many reported using contracts, and some also use price lists (table V-1).

Table V-4
CDMT: Count of U.S. producers' and importers' reported price setting methods

Method	U.S. producers	U.S. importers
Transaction-by-transaction	6	16
Contract	5	7
Set price list	3	5
Other	0	1
Responding firms	6	19

Source: Compiled from data submitted in response to Commission questionnaires.

Note: The sum of responses down may not add up to the total number of responding firms as each firm was instructed to check all applicable price setting methods employed.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2022 and then dividing by the customs value based on the HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030.

In 2022, most U.S. producers’ sales of CDMT (about two-thirds) were under annual or longer-term contracts whereas most importers’ sales (about four-fifths) were on a spot or short-term contract basis. U.S. producers reported selling most of their CDMT under annual contract, followed by short-term contract and long-term contract, and importers reported selling a plurality as spot sales, followed by short-term contract and long-term contract (table V-3). Two U.S. producers’ short-term contracts ranged from 72 to 90 days, and one reported a range of 90 to 365 days. U.S. producer *** reported that its long-term contracts lasted *** while U.S. producer *** long-term contracts ranged from *** years. Importers’ short-term contracts ranged from 90 to 140 days and their long-term contracts ranged from 2 to 5 years.

With respect to annual contracts, two U.S. producers allow price renegotiation while two do not, one fixes price and two fix both price and quantity, and three index to raw material prices while two do not. Firms cited using CRU and AMM as raw material price indices. With respect to short-term contracts, one U.S. producer allows price renegotiation while two do not, one fixes price and one fixes both price and quantity, and two index to raw material prices while one does not. With respect to long-term contracts, one U.S. producer allows price renegotiation while one does not, one fixes both price and quantity, and two index to raw material prices.

No importers allow price renegotiation, one fixes price and two fix both price and quantity, and one indexes to raw material prices for their short-term contracts. Four importers allow price renegotiation while three do not, three fix both quantity and price while one fixes quantity and one fixes prices, and three index to raw material prices for their long-term contracts.

Table V-5
CDMT: U.S. producers’ and importers’ shares of commercial U.S. shipments by type of sale, 2022

Share in percent

Type of sale	U.S. producers	Importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Because of rounding, figures may not add to the totals shown.

Six purchasers reported that they purchase product daily, six purchase weekly, six purchase monthly, three purchase quarterly, one purchases annually, and five purchase at other frequencies such as when orders indicate, as needed, and frequency varies based on high and low volume parts. Most (13 of 23) purchasers contact 1 to 3 suppliers before making a purchase, four contact up to 4 suppliers, three contact up to 5 suppliers, one contacts up to 6 suppliers, and one contacts up to 10 suppliers.

Sales terms and discounts

All six U.S. producers and seven importers typically quote prices on an f.o.b. basis while ten importers typically quote prices on a delivered basis. Five U.S. producers offer quantity and total volume discounts; U.S. producer ArcelorMittal reported that *** reported that discounts do not apply for all products and customers. A majority of importers (16 of 19) reported having no discount policy, two offer quantity discounts, one offers total volume discounts, and one *** offers weight bracket pricing and steel market-based pricing.

Price leadership

Most purchasers (15 of 18) reported one or more domestic producers as price leaders including: PTC Alliance (reported by 6 purchasers), ArcelorMittal (5), Sharon Tube (5), Webco (3), and Michigan Seamless (3). One purchaser each reported MetalMatic, Salem, Scot Industries, Tenaris, and Zekelman as price leaders. Purchasers indicating the presence of price leaders indicated that these price leaders led by announcing changes in price first, price letters to their customers, and setting their own market because of limited availability of heavy tube producers. Purchaser ***, which identified ArcelorMittal, Webco, PTC Alliance, and Sharon Tube as price leaders, reported that, if one mill issues a general price increase letter, the other mills will issue the same price increase in the following days. It continued that if one mill issues a price increase and no other mills follow, the mill will retract the increase within a few weeks. Purchasers reported that U.S. producer Michigan Seamless is consistently the lowest price option and that there is rarely any other domestic competition in the same price range.

Price data

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following CDMT products shipped to unrelated U.S. customers during January 2017-June 2023.

Product 1.--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 5.000 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Product 2.--ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 4.500 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Product 3.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 2.500 inches, wall thickness 0.240 - 0.260 inch, length 17 - 24 feet, not honed, deburred ends.

Product 4.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 3.000 inches, wall thickness 0.178 - 0.198 inch, length 17 - 24 feet, not honed, deburred ends.

Product 5.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 3.750 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Product 6.--ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 4.000 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Four U.S. producers and three importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁴ Pricing data reported by these firms accounted for approximately 1.3 percent of U.S. producers' U.S. shipments of CDMT, *** percent of U.S. shipments of subject imports from China, and *** percent of U.S. shipments of subject imports from South Korea during January 2017-June

⁴ Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

2023.⁵ No price data were reported for imports from Germany or Switzerland and no usable price data were reported for India and Italy.^{6 7 8}

Price data for products 1-6 are presented in tables V-6 to V-11 and figures V-3 to V-8.

⁵ Pricing coverage is based on U.S. shipments reported in questionnaires.

⁶ Staff has excluded data reported by importer ***, which reported price data for product 1 from India that was “***” and was between *** the average prices reported by other importers and U.S. producers.

⁷ Staff has excluded data reported by importer *** because it was unable to provide reasonable price data after requests for revision and clarification were sent. Email from ***.

⁸ Staff has excluded data reported by importer *** because it reported *** CDMT for products 1 and 2 from China and product 3 from Italy (***). Original confidential report, Tables V-3 and V-4.

Table V-6**CDMT: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	China price	China quantity	China margin
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 5.000 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Table V-7**CDMT: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by source and quarter**

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity
2017 Q1	***	***
2017 Q2	***	***
2017 Q3	***	***
2017 Q4	***	***
2018 Q1	***	***
2018 Q2	***	***
2018 Q3	***	***
2018 Q4	***	***
2019 Q1	***	***
2019 Q2	***	***
2019 Q3	***	***
2019 Q4	***	***
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 4.500 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Table V-8

CDMT: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 2.500 inches, wall thickness 0.240 - 0.260 inch, length 17 - 24 feet, not honed, deburred ends.

Table V-9

CDMT: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), by source and quarter

Price in dollars per short ton, quantity in short tons, margin in percent.

Period	U.S. price	U.S. quantity	South Korea price	South Korea quantity	South Korea margin
2017 Q1	***	***	***	***	***
2017 Q2	***	***	***	***	***
2017 Q3	***	***	***	***	***
2017 Q4	***	***	***	***	***
2018 Q1	***	***	***	***	***
2018 Q2	***	***	***	***	***
2018 Q3	***	***	***	***	***
2018 Q4	***	***	***	***	***
2019 Q1	***	***	***	***	***
2019 Q2	***	***	***	***	***
2019 Q3	***	***	***	***	***
2019 Q4	***	***	***	***	***
2020 Q1	***	***	***	***	***
2020 Q2	***	***	***	***	***
2020 Q3	***	***	***	***	***
2020 Q4	***	***	***	***	***
2021 Q1	***	***	***	***	***
2021 Q2	***	***	***	***	***
2021 Q3	***	***	***	***	***
2021 Q4	***	***	***	***	***
2022 Q1	***	***	***	***	***
2022 Q2	***	***	***	***	***
2022 Q3	***	***	***	***	***
2022 Q4	***	***	***	***	***
2023 Q1	***	***	***	***	***
2023 Q2	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 3.000 inches, wall thickness 0.178 - 0.198 inch, length 17 - 24 feet, not honed, deburred ends.

Table V-10**CDMT: Weighted-average f.o.b. prices and quantities of domestic product 5, by source and quarter**

Price in dollars per short ton, quantity in short tons.

Period	U.S. price	U.S. quantity
2017 Q1	***	***
2017 Q2	***	***
2017 Q3	***	***
2017 Q4	***	***
2018 Q1	***	***
2018 Q2	***	***
2018 Q3	***	***
2018 Q4	***	***
2019 Q1	***	***
2019 Q2	***	***
2019 Q3	***	***
2019 Q4	***	***
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 5: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 3.750 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Table V-11
CDMT: Weighted-average f.o.b. prices and quantities of domestic product 6, by source and quarter

Price in dollars per short ton, quantity in short tons.

Period	U.S. price	U.S. quantity
2017 Q1	***	***
2017 Q2	***	***
2017 Q3	***	***
2017 Q4	***	***
2018 Q1	***	***
2018 Q2	***	***
2018 Q3	***	***
2018 Q4	***	***
2019 Q1	***	***
2019 Q2	***	***
2019 Q3	***	***
2019 Q4	***	***
2020 Q1	***	***
2020 Q2	***	***
2020 Q3	***	***
2020 Q4	***	***
2021 Q1	***	***
2021 Q2	***	***
2021 Q3	***	***
2021 Q4	***	***
2022 Q1	***	***
2022 Q2	***	***
2022 Q3	***	***
2022 Q4	***	***
2023 Q1	***	***
2023 Q2	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 4.000 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Figure V-3

CDMT: Weighted-average prices and quantities of domestic and imported product 1, by source and quarter

Price of product 1

* * * * *

Volume of product 1

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 1: ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 5.000 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Figure V-4
CDMT: Weighted-average prices and quantities of domestic and imported product 2, by source and quarter

Price of product 2

* * * * *

Volume of product 2

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 2: ASTM A519 (or equivalent specification) Cold-Drawn Seamless Tube, Grade 1010-1026, outside diameter 4.500 inches, wall thickness 0.990 - 1.010 inch, length 17- 24 feet, not honed, deburred ends.

Figure V-5
CDMT: Weighted-average prices and quantities of domestic and imported product 3, by source and quarter

Price of product 3						
*	*	*	*	*	*	*

Volume of product 3						
*	*	*	*	*	*	*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 3: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 2.500 inches, wall thickness 0.240 - 0.260 inch, length 17 - 24 feet, not honed, deburred ends.

Figure V-6
CDMT: Weighted-average prices and quantities of domestic and imported product 4, by source and quarter

Price of product 4						
*	*	*	*	*	*	*

Volume of product 4						
*	*	*	*	*	*	*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 4: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade 1010-1026, outside diameter 3.000 inches, wall thickness 0.178 - 0.198 inch, length 17 - 24 feet, not honed, deburred ends.

Figure V-7
CDMT: Weighted-average prices and quantities of domestic product 5, by source and quarter

Price of product 5						
*	*	*	*	*	*	*

Volume of product 5						
*	*	*	*	*	*	*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 5: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 3.750 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Figure V-8
CDMT: Weighted-average prices and quantities of domestic product 6, by source and quarter

Price of product 6						
*	*	*	*	*	*	*

Volume of product 6						
*	*	*	*	*	*	*

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Product 6: ASTM A513-5 (or equivalent specification) Cold-Drawn Over Mandrel Welded Tube, Grade ST52.3, outside diameter 4.000 inches, wall thickness 0.245 - 0.265 inch, length 17 - 24 feet, not honed, deburred ends.

Price trends

In general, prices increased during January 2017-June 2023. Table V-10 summarizes the price trends, by country and by product for which useable data were reported. As shown in the table, domestic price increases ranged from *** to *** percent during January 2017-June 2023. There were too few quarters of import price data to calculate trends from January 2017 to June 2023.

Table V-12
CDMT: Summary of price data, by product and source, January 2017-June 2023

Quantity in short tons, price in dollars per short ton, change in percent

Product	Source	Number of quarters	Quantity of shipments	Low price	High price	First quarter price	Last quarter price	Change in price over period
Product 1	United States	***	***	***	***	***	***	***
Product 1	China	***	***	***	***	***	***	***
Product 2	United States	***	***	***	***	***	***	***
Product 3	United States	***	***	***	***	***	***	***
Product 3	South Korea	***	***	***	***	***	***	***
Product 4	United States	***	***	***	***	***	***	***
Product 4	South Korea	***	***	***	***	***	***	***
Product 5	United States	***	***	***	***	***	***	***
Product 6	United States	***	***	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires.

Note: Percent change column is percentage change from the first quarter of 2017 to the second quarter of 2023.

Price comparisons⁹

As shown in tables V-13 and V-14, prices for CDMT imported from subject countries were below those for U.S.-produced product in 20 of 31 instances; margins of underselling

⁹ In the original investigations, subject imports from China were priced lower than domestic product in 19 of 27 comparisons, with underselling margins ranging from *** to *** percent; subject imports
(continued...)

ranged from 0.7 to 45.9 percent. In the remaining 11 instances, prices for CDMT from subject countries were between 1.7 and 14.0 percent above prices for the domestic product.

Table V-13
CDMT: Instances of underselling and overselling and the range and average of margins, by product, January 2017 through June 2023

Quantity in short tons; margin in percent

Product	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
Product 1	Underselling	***	***	***	***	***
Product 2	Underselling	***	***	***	***	***
Product 3	Underselling	***	***	***	***	***
Product 4	Underselling	***	***	***	***	***
Product 5	Underselling	***	***	***	***	***
Product 6	Underselling	***	***	***	***	***
Total, all products	Underselling	20	***	16.5	0.7	45.9
Product 1	Overselling	***	***	***	***	***
Product 2	Overselling	***	***	***	***	***
Product 3	Overselling	***	***	***	***	***
Product 4	Overselling	***	***	***	***	***
Product 5	Overselling	***	***	***	***	***
Product 6	Overselling	***	***	***	***	***
Total, all products	Overselling	11	***	(10.6)	(1.7)	(14.0)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

from India were priced lower than domestic product in 16 of 44 comparisons, with underselling margins ranging from *** to *** percent; subject imports from Italy were priced lower than domestic product in 23 of 31 comparisons, with underselling margins ranging from *** to *** percent, and subject imports from Korea were priced lower than domestic product in 3 of 3 comparisons, with underselling margins ranging from *** to *** percent. There were no price comparisons for CDMT from Germany or Switzerland. Original confidential report, p. V-29.

Table V-14**CDMT: Instances of underselling and overselling and the range and average of margins, by source, January 2017 through June 2023**

Quantity in short tons; margin in percent

Source	Type	Number of quarters	Quantity	Average margin	Min margin	Max margin
China	Underselling	***	***	***	***	***
Germany	Underselling	***	***	***	***	***
India	Underselling	***	***	***	***	***
Italy	Underselling	***	***	***	***	***
South Korea	Underselling	***	***	***	***	***
Switzerland	Underselling	***	***	***	***	***
Total, all subject sources	Underselling	20	***	16.5	0.7	45.9
China	Overselling	***	***	***	***	***
Germany	Overselling	***	***	***	***	***
India	Overselling	***	***	***	***	***
Italy	Overselling	***	***	***	***	***
South Korea	Overselling	***	***	***	***	***
Switzerland	Overselling	***	***	***	***	***
Total, all subject sources	Overselling	11	***	(10.6)	(1.7)	(14.0)

Source: Compiled from data submitted in response to Commission questionnaires.

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

Prices in the U.S. market compared to non-U.S. markets

Three U.S. producers reported that they are familiar with prices for CDMT in non-U.S. markets. U.S. producer *** reported that it believes that the non-U.S. market price for CDMT is approximately 30 to 40 percent lower than the price in the U.S. market (it did not note to which non-U.S. market it was referring). U.S. producer *** reported that Canadian and Western European pricing is equivalent to the U.S. market, while U.S. producer *** reported that Canada has considerably lower market pricing due to the lack of tariff or trade case designations.

Foreign producers generally reported that where there is comparable product in different markets, prices for CDMT sold in the United States are higher than CDMT prices in their home countries. One firm estimated a range of 5 to 15 percent higher prices in the United States compared to India, one estimated 50 percent higher compared to Germany, and one estimated more than 67 percent compared to Germany.

APPENDIX A
FEDERAL REGISTER NOTICES

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
88 FR 63, January 3, 2023	<i>Initiation of Five-Year (Sunset) Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-01-03/pdf/2022-28522.pdf
88 FR 114, January 3, 2023	<i>Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, South Korea, and Switzerland; Institution of Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-01-03/pdf/2022-28470.pdf
88 FR 16587, March 20, 2023	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China, the Federal Republic of Germany, India, Italy, the Republic of Korea, and Switzerland: Final Results of the Expedited First Sunset Review of the Antidumping Duty Orders</i>	https://www.govinfo.gov/content/pkg/FR-2023-03-20/pdf/2023-05619.pdf
88 FR 19612, April 3, 2023	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From the People's Republic of China: Final Results of Expedited First Sunset Review of Antidumping Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2023-04-03/pdf/2023-06793.pdf
88 FR 24386, April 20, 2023	<i>Certain Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel From India: Final Results of the Expedited First Sunset Review of the Countervailing Duty Order</i>	https://www.govinfo.gov/content/pkg/FR-2023-04-20/pdf/2023-08365.pdf
88 FR 24442, April 20, 2023	<i>Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, South Korea, and Switzerland; Notice of Commission Determination To Conduct Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-04-20/pdf/2023-08348.pdf
88 FR 44841, July 13, 2023	<i>Cold-Drawn Mechanical Tubing From China, Germany, India, Italy, South Korea, and Switzerland; Scheduling of Full Five-Year Reviews</i>	https://www.govinfo.gov/content/pkg/FR-2023-07-13/pdf/2023-14873.pdf

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared as witnesses at the United States International Trade Commission's hearing:

Subject: Cold-Drawn Mechanical Tubing of Carbon and Alloy Steel from China, Germany, India, Italy, South Korea, and Switzerland

Inv. Nos.: 701-TA-576-577 and 731-TA-1362-1367 (Review)

Date and Time: November 28, 2023 - 9:30 a.m.

Sessions were held in connection with these reviews in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

OPENING REMARKS:

In Support of Continuation (**R. Alan Luberda**, Kelley Drye & Warren LLP)
In Opposition to Continuation (**Kristina Zissis**, White & Case LLP)

In Support of the Continuation of the Antidumping and Countervailing Duty Orders:

Kelley Drye & Warren LLP
Washington, DC
on behalf of

ArcelorMittal Tubular Products
Michigan Seamless Tube, LLC
PTC Alliance LLC
Sharon Tube (a division of Zekelman Industries, Inc.)
Webco Industries, Inc.

Edward Vore, Chief Executive Officer,
ArcelorMittal Tubular Products of North America

Darren Dossi, Chief Commercial Officer,
ArcelorMittal Tubular Products of North America

**In Support of the Continuation of the
Antidumping and Countervailing Duty Orders (continued):**

Michael Salamon, President and Chief Executive Officer,
Michigan Seamless Tube, LLC

Rich Rosinski, General Manager Sales, Michigan Seamless Tube, LLC

Cary Hart, President and Chief Executive Officer, PTC Alliance LLC

Dan Reilly, President, Sharon Tube Division of Zekelman Industries, Inc.

Nicholas G. Klenovich, Vice President, Commercial Business Groups,
Webco Industries, Inc.

Michael T. Kerwin, Assistant Director, Georgetown Economic Services, LLC

William B. Hudgens, Senior Trade Analyst, Georgetown Economic Services, LLC

Jacob Jones, Trade Analyst, Georgetown Economic Services, LLC

R. Alan Luberda)
Kathleen W. Cannon) – OF COUNSEL
Melissa M. Brewer)

**In Opposition to the Continuation of the
Antidumping and Countervailing Duty Orders:**

White & Case LLP
Washington, DC
on behalf of

Dalmine S.p.A. (“Dalmine”)
Marcegaglia Carbon Steel S.p.A.
Tenaris Global Services (U.S.A.) Corporation (“TGS USA”)

Paolo Cattaneo, Institutional Relations Senior Manager, Dalmine S.p.A

Cinzia Rottoli, Sales Senior Director Automotive and Hydraulic Cylinders, Tenaris

**In Opposition to the Continuation of the
Antidumping and Countervailing Duty Orders (continued):**

Jameson Dunn, Sales Director – Mechanical Oil & Gas Tools, Tenaris

Kristina Zissis)
) – OF COUNSEL
Luca Bertazzo)

REBUTTAL/CLOSING REMARKS:

In Support of Continuation (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)

In Opposition to Continuation (**Kristina Zissis**, White & Case LLP)

APPENDIX C
SUMMARY DATA

Summary data compiled in the current reviews	C-3
Summary data compiled in the previous proceeding	C-9

SUMMARY DATA COMPILED IN THE CURRENT REVIEWS

Table C-1

CDMT: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	2017	2018	Calendar year		2021	2022	Jan-Jun	2023
			2019	2020				
U.S. consumption quantity:								
Amount.....	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***
Importers' share (fn1):								
China.....	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***
Italy.....	***	***	***	***	***	***	***	***
South Korea.....	***	***	***	***	***	***	***	***
Switzerland.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***
U.S. consumption value:								
Amount.....	***	***	***	***	***	***	***	***
Producers' share (fn1).....	***	***	***	***	***	***	***	***
Importers' share (fn1):								
China.....	***	***	***	***	***	***	***	***
Germany.....	***	***	***	***	***	***	***	***
India.....	***	***	***	***	***	***	***	***
Italy.....	***	***	***	***	***	***	***	***
South Korea.....	***	***	***	***	***	***	***	***
Switzerland.....	***	***	***	***	***	***	***	***
Subject sources.....	***	***	***	***	***	***	***	***
Nonsubject sources.....	***	***	***	***	***	***	***	***
All import sources.....	***	***	***	***	***	***	***	***
U.S. importers' U.S. shipments of imports from:								
China:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Germany:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
India:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Italy:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
South Korea:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Switzerland:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***

Table continued.

Table C-1 Continued

CDMT: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes						Jan-Jun 2022-23
	2017-22	2017-18	Calendar years			2021-22	
			2018-19	2019-20	2020-21		
U.S. consumption quantity:							
Amount.....	▼***	▲***	▼***	▼***	▲***	▲***	▼***
Producers' share (fn1).....	▲***	▲***	▲***	▲***	▼***	▲***	▲***
Importers' share (fn1):							
China.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Germany.....	▼***	▼***	▼***	▼***	▲***	▲***	▼***
India.....	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Italy.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
South Korea.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Switzerland.....	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Subject sources.....	▼***	▼***	▼***	▲***	▲***	▼***	▼***
Nonsubject sources.....	▼***	▲***	▲***	▼***	▼***	▲***	▲***
All import sources.....	▼***	▼***	▼***	▼***	▲***	▼***	▼***
U.S. consumption value:							
Amount.....	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Producers' share (fn1).....	▲***	▲***	▲***	▲***	▲***	▲***	▲***
Importers' share (fn1):							
China.....	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Germany.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
India.....	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Italy.....	▼***	▼***	▼***	▲***	▼***	▲***	▲***
South Korea.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Switzerland.....	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Subject sources.....	▼***	▼***	▼***	▲***	▲***	▲***	▼***
Nonsubject sources.....	▼***	▲***	▲***	▼***	▼***	▼***	▲***
All import sources.....	▼***	▼***	▼***	▼***	▼***	▼***	▼***
U.S. importers' U.S. shipments of imports from:							
China:							
Quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Value.....	▼***	▼***	▼***	▼***	▲***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Germany:							
Quantity.....	▼***	▼***	▼***	▼***	▲***	▲***	▼***
Value.....	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▼***	▼***	▲***	▲***	▲***
Ending inventory quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	▼***
India:							
Quantity.....	▲***	▼***	▼***	▲***	▲***	▼***	▼***
Value.....	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▼***
Ending inventory quantity.....	▼***	▼***	▲***	▼***	▼***	▲***	▲***
Italy:							
Quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Value.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***
Unit value.....	▲***	▲***	▲***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▲***	▲***	▼***
South Korea:							
Quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Value.....	▼***	▼***	▼***	▼***	▼***	▲***	▼***
Unit value.....	▲***	▲***	▼***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	***	***	▼***
Switzerland:							
Quantity.....	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Value.....	▼***	▲***	▼***	▼***	▼***	▼***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▲***
Ending inventory quantity.....	▲***	▲***	▼***	▲***	▼***	▼***	▼***

Table continued.

Table C-1 Continued

CDMT: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Reported data							
	2017	2018	Calendar year		2021	2022	Jan-Jun	
			2019	2020			2022	2023
U.S. importers' U.S. shipments of imports from: Continued								
Subject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
Nonsubject sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
All import sources:								
Quantity.....	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***
Ending inventory quantity.....	***	***	***	***	***	***	***	***
U.S. producers:								
Practical capacity quantity.....	575,200	601,785	585,077	479,587	530,241	535,029	274,836	264,653
Production quantity.....	467,402	532,461	443,965	365,231	450,903	446,950	236,659	220,987
Capacity utilization (fn1).....	81.3	88.5	75.9	76.2	85.0	83.5	86.1	83.5
U.S. shipments:								
Quantity.....	382,570	443,330	392,899	311,705	363,046	379,372	201,715	196,412
Value.....	683,238	886,795	780,289	557,262	927,674	1,136,502	631,972	514,988
Unit value.....	\$1,786	\$2,000	\$1,986	\$1,788	\$2,555	\$2,996	\$3,133	\$2,622
Export shipments:								
Quantity.....	80,221	80,973	63,390	56,367	77,307	64,750	35,984	30,135
Value.....	149,964	165,044	126,544	99,537	194,405	198,572	116,072	75,577
Unit value.....	\$1,869	\$2,038	\$1,996	\$1,766	\$2,515	\$3,067	\$3,226	\$2,508
Ending inventory quantity.....	30,092	36,247	23,080	18,438	27,875	28,801	25,889	22,675
Inventories/total shipments (fn1).....	6.5	6.9	5.1	5.0	6.3	6.5	5.4	5.0
Production workers.....	2,257	2,475	2,377	2,107	2,184	2,226	2,255	2,152
Hours worked (1,000s).....	5,446	5,908	5,419	4,532	4,974	5,163	2,627	2,512
Wages paid (\$1,000).....	144,098	164,741	149,529	126,876	154,516	165,637	84,445	85,089
Hourly wages (dollars per hour).....	\$26.46	\$27.88	\$27.59	\$28.00	\$31.06	\$32.08	\$32.15	\$33.87
Productivity (short tons per 1,000 hours).....	85.8	90.1	81.9	80.6	90.7	86.6	90.1	88.0
Unit labor costs.....	\$308	\$309	\$337	\$347	\$343	\$371	\$357	\$385
Net sales:								
Quantity.....	462,791	524,303	456,289	368,072	440,353	444,122	237,699	226,547
Value.....	833,202	1,051,839	906,833	656,799	1,122,079	1,335,074	748,044	590,565
Unit value.....	\$1,800	\$2,006	\$1,987	\$1,784	\$2,548	\$3,006	\$3,147	\$2,607
Cost of goods sold (COGS).....	747,073	936,370	831,032	607,764	957,725	1,183,849	644,785	485,276
Gross profit or (loss) (fn2).....	86,129	115,469	75,801	49,035	164,354	151,225	103,259	105,289
SG&A expenses.....	43,789	56,065	46,046	45,249	61,331	56,266	28,734	25,309
Operating income or (loss) (fn2).....	42,340	59,404	29,755	3,786	103,023	94,959	74,525	79,980
Net income or (loss) (fn2).....	29,191	50,313	21,448	(3,679)	92,042	78,647	68,762	74,621
Unit COGS.....	\$1,614	\$1,786	\$1,821	\$1,651	\$2,175	\$2,666	\$2,713	\$2,142
Unit SG&A expenses.....	\$95	\$107	\$101	\$123	\$139	\$127	\$121	\$112
Unit operating income or (loss) (fn2).....	\$91	\$113	\$65	\$10	\$234	\$214	\$314	\$353
Unit net income or (loss) (fn2).....	\$63	\$96	\$47	\$(10)	\$209	\$177	\$289	\$329
COGS/sales (fn1).....	89.7	89.0	91.6	92.5	85.4	88.7	86.2	82.2
Operating income or (loss)/sales (fn1).....	5.1	5.6	3.3	0.6	9.2	7.1	10.0	13.5
Net income or (loss)/sales (fn1).....	3.5	4.8	2.4	(0.6)	8.2	5.9	9.2	12.6
Capital expenditures.....	26,618	22,495	30,055	20,351	26,028	44,991	14,745	22,153
Research and development expenses.....	***	***	***	***	***	***	***	***
Net assets.....	598,597	555,945	462,496	432,437	634,292	619,693	NA	NA

Table continued.

Table C-1 Continued

CDMT: Summary data concerning the U.S. market, by item and period

Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted

Item	Period changes							
	2017-22	2017-18	Calendar years			2020-21	2021-22	Jan-Jun 2022-23
			2018-19	2019-20				
U.S. importers' U.S. shipments of imports from: Continued								
Subject sources:								
Quantity.....	▼***	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Value.....	▼***	▼***	▼***	▼***	▲***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▼***	▲***	▲***	▼***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***	▲***
Nonsubject sources:								
Quantity.....	▼***	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Value.....	▲***	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▲***	▼***
Ending inventory quantity.....	▲***	▲***	▲***	▼***	▲***	▼***	▲***	▲***
All import sources:								
Quantity.....	▼***	▼***	▼***	▼***	▲***	▼***	▼***	▼***
Value.....	▲***	▲***	▼***	▼***	▲***	▲***	▲***	▼***
Unit value.....	▲***	▲***	▲***	▼***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	▼***	▼***	▼***	▼***	▼***	▲***	▲***	▲***
U.S. producers':								
Practical capacity quantity.....	▼(7.0)	▲4.6	▼(2.8)	▼(18.0)	▲10.6	▲0.9	▼(3.7)	▼(3.7)
Production quantity.....	▼(4.4)	▲13.9	▼(16.6)	▼(17.7)	▲23.5	▼(0.9)	▼(6.6)	▼(6.6)
Capacity utilization (fn1).....	▲2.3	▲7.2	▼(12.6)	▲0.3	▲8.9	▼(1.5)	▼(2.6)	▼(2.6)
U.S. shipments:								
Quantity.....	▼(0.8)	▲15.9	▼(11.4)	▼(20.7)	▲16.5	▲4.5	▼(2.6)	▼(2.6)
Value.....	▲66.3	▲29.8	▼(12.0)	▼(28.6)	▲66.5	▲22.5	▼(18.5)	▼(18.5)
Unit value.....	▲67.7	▲12.0	▼(0.7)	▼(10.0)	▲42.9	▲17.2	▼(16.3)	▼(16.3)
Export shipments:								
Quantity.....	▼(19.3)	▲0.9	▼(21.7)	▼(11.1)	▲37.1	▼(16.2)	▼(16.3)	▼(16.3)
Value.....	▲32.4	▲10.1	▼(23.3)	▼(21.3)	▲95.3	▲2.1	▼(34.9)	▼(34.9)
Unit value.....	▲64.1	▲9.0	▼(2.1)	▼(11.5)	▲42.4	▲22.0	▼(22.2)	▼(22.2)
Ending inventory quantity.....	▼(4.3)	▲20.5	▼(36.3)	▼(20.1)	▲51.2	▲3.3	▼(12.4)	▼(12.4)
Inventories/total shipments (fn1).....	▼(0.0)	▲0.4	▼(1.9)	▼(0.0)	▲1.3	▲0.2	▼(0.4)	▼(0.4)
Production workers.....	▼(1.4)	▲9.7	▼(4.0)	▼(11.4)	▲3.7	▲1.9	▼(4.6)	▼(4.6)
Hours worked (1,000s).....	▼(5.2)	▲8.5	▼(8.3)	▼(16.4)	▲9.8	▲3.8	▼(4.4)	▼(4.4)
Wages paid (\$1,000).....	▲14.9	▲14.3	▼(9.2)	▼(15.1)	▲21.8	▲7.2	▲0.8	▲0.8
Hourly wages (dollars per hour).....	▲21.2	▲5.4	▼(1.0)	▲1.5	▲11.0	▲3.3	▲5.4	▲5.4
Productivity (short tons per 1,000 hours).....	▲0.9	▲5.0	▼(9.1)	▼(1.6)	▲12.5	▼(4.5)	▼(2.3)	▼(2.3)
Unit labor costs.....	▲20.2	▲0.4	▲8.9	▲3.1	▼(1.4)	▲8.1	▲7.9	▲7.9
Net sales:								
Quantity.....	▼(4.0)	▲13.3	▼(13.0)	▼(19.3)	▲19.6	▲0.9	▼(4.7)	▼(4.7)
Value.....	▲60.2	▲26.2	▼(13.8)	▼(27.6)	▲70.8	▲19.0	▼(21.1)	▼(21.1)
Unit value.....	▲67.0	▲11.4	▼(0.9)	▼(10.2)	▲42.8	▲18.0	▼(17.2)	▼(17.2)
Cost of goods sold (COGS).....	▲58.5	▲25.3	▼(11.2)	▼(26.9)	▲57.6	▲23.6	▼(24.7)	▼(24.7)
Gross profit or (loss) (fn2).....	▲75.6	▲34.1	▼(34.4)	▼(35.3)	▲235.2	▼(8.0)	▲2.0	▲2.0
SG&A expenses.....	▲28.5	▲28.0	▼(17.9)	▼(1.7)	▲35.5	▼(8.3)	▼(11.9)	▼(11.9)
Operating income or (loss) (fn2).....	▲124.3	▲40.3	▼(49.9)	▼(87.3)	▲2,621.2	▼(7.8)	▲7.3	▲7.3
Net income or (loss) (fn2).....	▲169.4	▲72.4	▼(57.4)	---	---	▼(14.6)	▲8.5	▲8.5
Unit COGS.....	▲65.1	▲10.6	▲2.0	▼(9.3)	▲31.7	▲22.6	▼(21.0)	▼(21.0)
Unit SG&A expenses.....	▲33.9	▲13.0	▼(5.6)	▲21.8	▲13.3	▼(9.0)	▼(7.6)	▼(7.6)
Unit operating income or (loss) (fn2).....	▲133.7	▲23.8	▼(42.4)	▼(84.2)	▲2,174.5	▼(8.6)	▲12.6	▲12.6
Unit net income or (loss) (fn2).....	▲180.7	▲52.1	▼(51.0)	---	---	▼(15.3)	▲13.9	▲13.9
COGS/sales (fn1).....	▼(1.0)	▼(0.6)	▲2.6	▲0.9	▼(7.2)	▲3.3	▼(4.0)	▼(4.0)
Operating income or (loss)/sales (fn1).....	▲2.0	▲0.6	▼(2.4)	▼(2.7)	▲8.6	▼(2.1)	▲3.6	▲3.6
Net income or (loss)/sales (fn1).....	▲2.4	▲1.3	▼(2.4)	▼(2.9)	▲8.8	▼(2.3)	▲3.4	▲3.4
Capital expenditures.....	▲69.0	▼(15.5)	▲33.6	▼(32.3)	▲27.9	▲72.9	▲50.2	▲50.2
Research and development expenses.....	▼***	▼***	▼***	▼***	▲***	▼***	▲***	▲***
Net assets.....	▲3.5	▼(7.1)	▼(16.8)	▼(6.5)	▲46.7	▼(2.3)	NA	NA

Source: Compiled from data submitted in response to Commission questionnaires with a supplement for non-responding U.S. importers from proprietary, Census-edited Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030 accessed October 24, 2023. Supplemental imports were also reported as U.S. shipments. 508 compliant tables containing these data are contained in parts I, III, and IV of this report.

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

SUMMARY DATA COMPILED IN THE PREVIOUS PROCEEDING

Table C-1

CDMT: Summary data concerning the U.S. market, 2014-16, January to June 2016, and January to June 201

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Calendar year			Jan-Jun
	2014	2015	2016	2016	2017	2014-16	2014-15	2015-16	2016-17
U.S. consumption quantity:									
Amount	558,573	473,923	445,089	227,613	255,358	(20.3)	(15.2)	(6.1)	12.2
Producers' share (fn1)	77.4	75.1	71.6	74.1	74.7	(5.8)	(2.3)	(3.5)	0.6
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Korea	***	***	***	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	22.6	24.9	28.4	25.9	25.3	5.8	2.3	3.5	(0.6)
U.S. consumption value:									
Amount	1,113,908	890,783	774,443	392,944	463,392	(30.5)	(20.0)	(13.1)	17.9
Producers' share (fn1)	73.3	70.7	68.5	69.0	72.7	(4.7)	(2.5)	(2.2)	3.7
Importers' share (fn1):									
China	***	***	***	***	***	***	***	***	***
Germany	***	***	***	***	***	***	***	***	***
India	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Korea	***	***	***	***	***	***	***	***	***
Switzerland	***	***	***	***	***	***	***	***	***
Subject sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	26.7	29.3	31.5	31.0	27.3	4.7	2.5	2.2	(3.7)
U.S. importers' U.S. shipments of imports from--									
China:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Germany:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
India:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Italy:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Korea:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Switzerland:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Subject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
Nonsubject sources:									
Quantity	***	***	***	***	***	***	***	***	***
Value	***	***	***	***	***	***	***	***	***
Unit value	***	***	***	***	***	***	***	***	***
Ending inventory quantity	***	***	***	***	***	***	***	***	***
All import sources:									
Quantity	126,020	117,999	126,453	58,982	64,582	0.3	(6.4)	7.2	9.5
Value	297,697	260,724	243,638	121,982	126,678	(18.2)	(12.4)	(6.6)	3.8
Unit value	\$2,362	\$2,210	\$1,927	\$2,068	\$1,962	(18.4)	(6.5)	(12.8)	(5.2)
Ending inventory quantity	27,953	37,620	34,162	37,449	31,979	22.2	34.6	(9.2)	(14.6)
U.S. producers:									
Average capacity quantity	677,489	678,760	706,243	349,714	356,139	4.2	0.2	4.0	1.8
Production quantity	493,139	380,954	364,210	194,314	228,660	(26.1)	(22.7)	(4.4)	17.7
Capacity utilization (fn1)	72.8	56.1	51.6	55.6	64.2	(21.2)	(16.7)	(4.6)	8.6
U.S. shipments:									
Quantity	432,553	355,924	318,636	168,631	190,776	(26.3)	(17.7)	(10.5)	13.1
Value	816,211	630,059	530,805	270,962	336,714	(35.0)	(22.8)	(15.8)	24.3
Unit value	\$1,887	\$1,770	\$1,666	\$1,607	\$1,765	(11.7)	(6.2)	(5.9)	9.8
Export shipments:									
Quantity	50,724	51,422	52,714	25,710	34,322	3.9	1.4	2.5	33.5
Value	93,968	91,265	90,077	40,814	62,114	(4.1)	(2.9)	(1.3)	52.2
Unit value	\$1,853	\$1,775	\$1,709	\$1,587	\$1,810	(7.8)	(4.2)	(3.7)	14.0
Ending inventory quantity	72,631	46,239	39,098	42,017	46,306	(46.2)	(36.3)	(15.4)	10.2
Inventories/total shipments (fn1)	15.0	11.4	10.5	10.8	10.3	(4.5)	(3.7)	(0.8)	(0.5)
Production workers	2,022	1,931	1,802	1,812	1,840	(10.9)	(4.5)	(6.7)	1.5
Hours worked (1,000s)	4,098	3,785	3,722	1,858	2,048	(9.2)	(7.6)	(1.7)	10.2
Wages paid (\$1,000)	113,670	100,679	97,978	48,921	56,589	(13.8)	(11.4)	(2.7)	15.7
Hourly wages (dollars per hour)	\$27.74	\$26.60	\$26.32	\$26.33	\$27.63	(5.1)	(4.1)	(1.0)	4.9
Productivity (short tons per 1,000 hours)	120.3	100.6	97.9	104.6	111.7	(18.7)	(16.4)	(2.8)	6.8
Unit labor costs	\$230.50	\$264.28	\$269.02	\$251.76	\$247.48	16.7	14.7	1.8	(1.7)

Table continued on next page.

Table C-1--Continued

CDMT: Summary data concerning the U.S. market, 2014-16, January to June 2016, and January to June 2017

(Quantity=short tons; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per short ton; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Calendar year			Jan-Jun
	2014	2015	2016	2016	2017	2014-16	2014-15	2015-16	2016-17
U.S. producers:									
Net sales:									
Quantity	476,053	412,367	371,474	194,341	242,098	(22.0)	(13.4)	(9.9)	24.6
Value	895,860	735,109	618,119	311,777	398,828	(31.0)	(17.9)	(15.9)	27.9
Unit value	\$1,882	\$1,783	\$1,664	\$1,604	\$1,647	(11.6)	(5.3)	(6.7)	2.7
Cost of goods sold (COGS)	796,767	709,158	578,907	291,698	362,880	(27.3)	(11.0)	(18.4)	24.4
Gross profit or (loss)	99,093	25,951	39,212	20,079	35,948	(60.4)	(73.8)	51.1	79.0
SG&A expenses	47,641	43,929	39,714	20,880	22,982	(16.6)	(7.8)	(9.6)	10.1
Operating income or (loss)	51,452	(17,978)	(502)	(801)	12,966	(101.0)	(134.9)	(97.2)	fn2
Net income or (loss)	29,357	(42,651)	(21,893)	(8,154)	2,877	fn2	fn2	(48.7)	fn2
Capital expenditures	27,449	28,675	18,004	9,666	8,588	(34.4)	4.5	(37.2)	(11.2)
Unit COGS	\$1,674	\$1,720	\$1,558	\$1,501	\$1,499	(6.9)	2.8	(9.4)	(0.1)
Unit SG&A expenses	\$100	\$107	\$107	\$107	\$95	6.8	6.4	0.4	(11.6)
Unit operating income or (loss)	\$108	\$(44)	\$(1)	\$(4)	\$54	(101.3)	(140.3)	(96.9)	fn2
Unit net income or (loss)	\$62	\$(103)	\$(59)	\$(42)	\$12	fn2	fn2	(43.0)	fn2
COGS/sales (fn1)	88.9	96.5	93.7	93.6	91.0	4.7	7.5	(2.8)	(2.6)
Operating income or (loss)/sales (fn1)	5.7	(2.4)	(0.1)	(0.3)	3.3	(5.8)	(8.2)	2.4	3.5
Net income or (loss)/sales (fn1)	3.3	(5.8)	(3.5)	(2.6)	0.7	(6.8)	(9.1)	2.3	3.3

Notes:

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Undefined.

Source: Compiled from data submitted in response to Commission questionnaires and proprietary Customs records using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 11, 2017.

APPENDIX D

COMMENTS ON EFFECTS OF ORDERS AND LIKELY EFFECTS OF REVOCATION

Table D-1

CDMT: Firms' narratives on the impact of the orders and the likely impact of revocation

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Effect of order	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Likely impact of revocation	U.S. producers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact

Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***
Effect of order	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact

Effect of order	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***
Likely impact of revocation	Importers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Likely impact of revocation	Importers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact

Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact

Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Effect of order	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***
Likely impact of revocation	Purchasers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***

Response type	Firm type	Firm name and narrative on impact or likely impact
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Effect of order	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***
Likely impact of revocation	Foreign producers	***

Source: Compiled from data submitted in response to Commission questionnaires.

APPENDIX E

U.S. IMPORTS SUBJECT TO CHAPTER 99 PROVISIONS

Table E-1
CDMT: U.S. imports from China, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	3,244	3,294
Subject to chapter 99 provisions, not dutied	Quantity	---	262	47
Subject to chapter 99 provisions	Quantity	---	3,506	3,340
Not subject to chapter 99 provisions	Quantity	27,163	3,275	168
All duty statuses	Quantity	27,163	6,781	3,509
Subject to chapter 99 provisions, dutied	Share	---	47.8	93.9
Subject to chapter 99 provisions, not dutied	Share	---	3.9	1.3
Subject to chapter 99 provisions	Share	---	51.7	95.2
Not subject to chapter 99 provisions	Share	100.0	48.3	4.8
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-1 Continued
CDMT: U.S. imports from China, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	2,141	2,493	5,183
Subject to chapter 99 provisions, not dutied	Quantity	42	185	159
Subject to chapter 99 provisions	Quantity	2,183	2,678	5,342
Not subject to chapter 99 provisions	Quantity	569	---	97
All duty statuses	Quantity	2,752	2,678	5,439
Subject to chapter 99 provisions, dutied	Share	77.8	93.1	95.3
Subject to chapter 99 provisions, not dutied	Share	1.5	6.9	2.9
Subject to chapter 99 provisions	Share	79.3	100.0	98.2
Not subject to chapter 99 provisions	Share	20.7	---	1.8
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table E-2**CDMT: U.S. imports from Germany, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	7,856	9,532
Subject to chapter 99 provisions, not dutied	Quantity	---	83	76
Subject to chapter 99 provisions	Quantity	---	7,938	9,608
Not subject to chapter 99 provisions	Quantity	25,117	8,812	2,625
All duty statuses	Quantity	25,117	16,750	12,233
Subject to chapter 99 provisions, dutied	Share	---	46.9	77.9
Subject to chapter 99 provisions, not dutied	Share	---	0.5	0.6
Subject to chapter 99 provisions	Share	---	47.4	78.5
Not subject to chapter 99 provisions	Share	100.0	52.6	21.5
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-2 Continued**CDMT: U.S. imports from Germany, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	4,627	4,544	497
Subject to chapter 99 provisions, not dutied	Quantity	60	237	512
Subject to chapter 99 provisions	Quantity	4,688	4,781	1,009
Not subject to chapter 99 provisions	Quantity	3,085	4,606	7,492
All duty statuses	Quantity	7,773	9,387	8,501
Subject to chapter 99 provisions, dutied	Share	59.5	48.4	5.9
Subject to chapter 99 provisions, not dutied	Share	0.8	2.5	6.0
Subject to chapter 99 provisions	Share	60.3	50.9	11.9
Not subject to chapter 99 provisions	Share	39.7	49.1	88.1
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table E-3
CDMT: U.S. imports from India, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	13,960	13,712
Subject to chapter 99 provisions, not dutied	Quantity	---	229	4
Subject to chapter 99 provisions	Quantity	---	14,189	13,717
Not subject to chapter 99 provisions	Quantity	33,317	5,895	818
All duty statuses	Quantity	33,317	20,084	14,534
Subject to chapter 99 provisions, dutied	Share	---	69.5	94.3
Subject to chapter 99 provisions, not dutied	Share	---	1.1	0.0
Subject to chapter 99 provisions	Share	---	70.6	94.4
Not subject to chapter 99 provisions	Share	100.0	29.4	5.6
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-3 Continued
CDMT: U.S. imports from India, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	10,872	40,541	38,788
Subject to chapter 99 provisions, not dutied	Quantity	2	85	8
Subject to chapter 99 provisions	Quantity	10,874	40,626	38,796
Not subject to chapter 99 provisions	Quantity	361	1,299	1,416
All duty statuses	Quantity	11,235	41,925	40,212
Subject to chapter 99 provisions, dutied	Share	96.8	96.7	96.5
Subject to chapter 99 provisions, not dutied	Share	0.0	0.2	0.0
Subject to chapter 99 provisions	Share	96.8	96.9	96.5
Not subject to chapter 99 provisions	Share	3.2	3.1	3.5
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table E-4
CDMT: U.S. imports from Italy, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	1,684	1,786
Subject to chapter 99 provisions, not dutied	Quantity	---	32	1
Subject to chapter 99 provisions	Quantity	---	1,716	1,787
Not subject to chapter 99 provisions	Quantity	6,370	2,264	40
All duty statuses	Quantity	6,370	3,980	1,827
Subject to chapter 99 provisions, dutied	Share	---	42.3	97.8
Subject to chapter 99 provisions, not dutied	Share	---	0.8	0.0
Subject to chapter 99 provisions	Share	---	43.1	97.8
Not subject to chapter 99 provisions	Share	100.0	56.9	2.2
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-4 Continued
CDMT: U.S. imports from Italy, by duty status and period

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	719	1,111	507
Subject to chapter 99 provisions, not dutied	Quantity	119	3	35
Subject to chapter 99 provisions	Quantity	838	1,115	542
Not subject to chapter 99 provisions	Quantity	345	71	1,487
All duty statuses	Quantity	1,183	1,186	2,029
Subject to chapter 99 provisions, dutied	Share	60.7	93.7	25.0
Subject to chapter 99 provisions, not dutied	Share	10.1	0.3	1.7
Subject to chapter 99 provisions	Share	70.8	94.0	26.7
Not subject to chapter 99 provisions	Share	29.2	6.0	73.3
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table E-5**CDMT: U.S. imports from South Korea, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	11,417	5,932	2,724
All duty statuses	Quantity	11,417	5,932	2,724
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-5 Continued**CDMT: U.S. imports from South Korea, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	---	---	---
Subject to chapter 99 provisions, not dutied	Quantity	---	---	---
Subject to chapter 99 provisions	Quantity	---	---	---
Not subject to chapter 99 provisions	Quantity	1,764	1,315	2,077
All duty statuses	Quantity	1,764	1,315	2,077
Subject to chapter 99 provisions, dutied	Share	---	---	---
Subject to chapter 99 provisions, not dutied	Share	---	---	---
Subject to chapter 99 provisions	Share	---	---	---
Not subject to chapter 99 provisions	Share	100.0	100.0	100.0
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

Table E-6**CDMT: U.S. imports from Switzerland, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2017	2018	2019
Subject to chapter 99 provisions, dutied	Quantity	---	8,547	4,130
Subject to chapter 99 provisions, not dutied	Quantity	---	3,005	108
Subject to chapter 99 provisions	Quantity	---	11,551	4,239
Not subject to chapter 99 provisions	Quantity	10,324	4,411	6,029
All duty statuses	Quantity	10,324	15,962	10,268
Subject to chapter 99 provisions, dutied	Share	---	53.5	40.2
Subject to chapter 99 provisions, not dutied	Share	---	18.8	1.1
Subject to chapter 99 provisions	Share	---	72.4	41.3
Not subject to chapter 99 provisions	Share	100.0	27.6	58.7
All duty statuses	Share	100.0	100.0	100.0

Table continued.

Table E-6 Continued**CDMT: U.S. imports from Switzerland, by duty status and period**

Quantity in short tons; share in percent

Duty status	Measure	2020	2021	2022
Subject to chapter 99 provisions, dutied	Quantity	1,589	1,615	337
Subject to chapter 99 provisions, not dutied	Quantity	3	9	5
Subject to chapter 99 provisions	Quantity	1,592	1,623	342
Not subject to chapter 99 provisions	Quantity	3,247	1,432	1,065
All duty statuses	Quantity	4,839	3,055	1,408
Subject to chapter 99 provisions, dutied	Share	32.8	52.8	24.0
Subject to chapter 99 provisions, not dutied	Share	0.1	0.3	0.4
Subject to chapter 99 provisions	Share	32.9	53.1	24.3
Not subject to chapter 99 provisions	Share	67.1	46.9	75.7
All duty statuses	Share	100.0	100.0	100.0

Source: Compiled from data from official U.S. imports statistics of the U.S. Department of Commerce, Census Bureau using HTS statistical reporting numbers 7304.31.3000, 7304.31.6050, 7304.51.1000, 7304.51.5005, 7304.51.5060, 7306.30.5015, 7306.30.5020, and 7306.50.5030, accessed November 3, 2023. Imports are based on the imports for consumption data series.

Note: Shares shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "---". Duty status is based on the rate provision codes published by the U.S. Department of Commerce, Census Bureau.

