Forged Steel Fittings From China, Italy, and Taiwan

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Themes

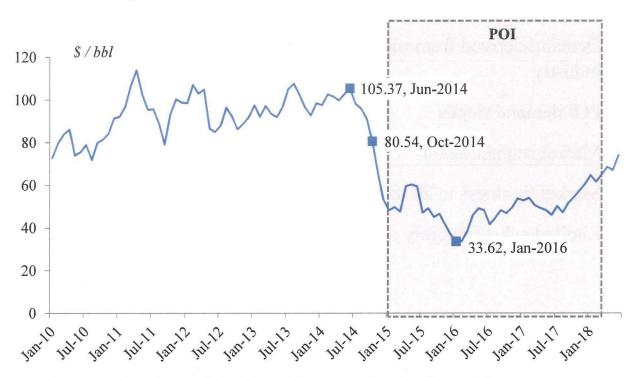
Key Themes of Economic Analysis

- Very large decline in demand during the first half of the POI followed by a partial recovery
- Subject imports and domestic industry performance mirrored demand trends closely
- No current injury based on statutory indicators
- Limited competition between normalized Italian fittings and domestic non-normalized domestic fittings
- No threat of injury from decumulated imports from Italy

Conditions of Competition

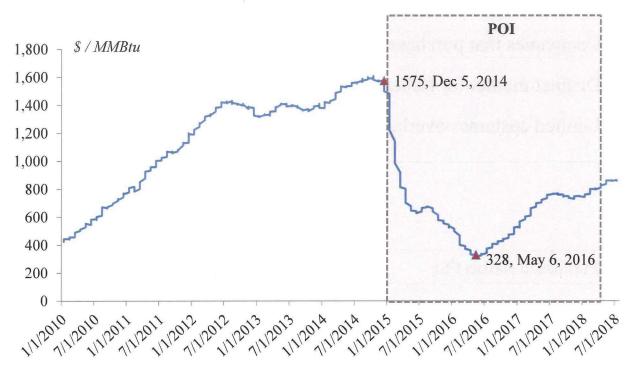
- Demand derived from piping systems, largely from oil and gas industry
- POI demand trends
- Market segmentation
- Market tightness in 2018:Q1
- Limited substitutability of Italian fittings

Light Sweet Crude Oil Futures Price



Source: Chicago Mercantile Exchange (end of period 1st expiring contract settlement) via Haver Analytics

Weekly U.S. Oil Rotary Rig Count



Source: Baker Hughes, "North America Rotary Rig Count (Jan 2000 - Current)" July 27, 2018, at http://phx.corporate-ir.net/phoenix.zhtml?c=79687&p=irol-reportsother (downloaded 7/30/2018)

Market segmentation

- Companies that purchase from China and those who do not
- Distinct market for Italian fittings
- Limited customer overlap

		Also purchased from					
То	tal	Ch	ina	Taiwan			
	Short tons						
[]]]]]		

	- 11	
Purchased	Italia	n FSF

Source: Responses to the Purchasers' questionnaire

Tight Supply at End of POI

- Tight supply reported by importers
- Seven purchasers reported supply constraints
- 3 purchasers stated that U.S. producers were not accepting new customers
- Industry press reported that domestic producers were operating at full capacity
- Low inventory levels

7

Asymmetric Substitutability

- Normalization
 - A form of heat treatment
 - · Normalized FSF are harder and have a more refined grain structure
- 100 percent of Italian fittings are normalized
- A significant proportion of subject Italian imports are consumed by end users who require normalized fittings
- For end users who demand normalized fittings in long-term contracts and supply agreements, non-normalized fittings are not interchangeable

U.S. production and subject imports & imports from Italy tracked U.S. consumption

U.S.	consumption quantity
U.S.	production quantity
U.S.	shipments of:
Subje	ect import quantity
Subje	ect Italian quantity

2015-16		2016-17	
[]	[]
[]	[]
[]	[]
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Subject imports & imports from Italy did not increase relative to production or consumption

U.S. producers' share of consumption
Subject import quantity relative to:
U.S. consumption quantity
U.S. production quantity
Subject Italian quantity relative to:
U.S. consumption quantity
U.S. production quantity

2015	2015-17		2015-16		2016-17			
	Percentage points							
[]]]	[]			
	,							
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U.S. production increased over the POI



U.S. capacity utilization increased over the POI

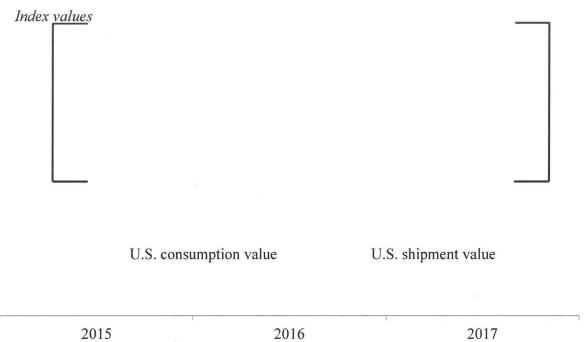


U.S. shipment quantity increased over the POI



13

U.S. shipment value increased over the POI



Source: Prehearing Report at C-3, Table C-1.

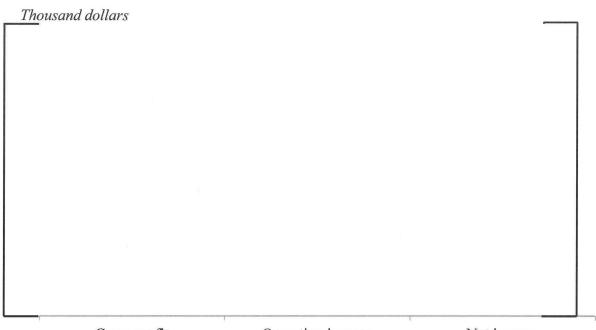
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All employment-related indicators improved from 2016 to 2017

Production workers (number)	
Hours worked (1,000s)	
Wages paid (\$1,000)	
Hourly wages (\$ per hour)	
Productivity (short tons per hour	·)

2016		2017		2016-17	
[]	[]]]
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[]	[]	[]

Absolute U.S. profitability improved over the POI



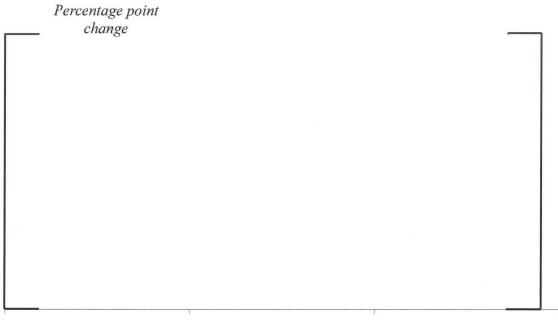
Gross profit

Operating income

Net income

Source: Prehearing Report at VI-6, Table VI-3; and C-4, Table C-1.

U.S. profitability relative to net sales improved over the POI



Gross profit/sales

Operating income/sales

Net income/sales

Source: Prehearing Report at VI-6, Table VI-3; and C-4, Table C-1.

Price

Price effects were not significant

- Underselling coverage is poor for the domestic industry and the subject imports
- No price depression
 - "We consequently do not find that cumulated subject imports depressed prices of the domestic like product to a significant degree." Preliminary Determination at 31.
- No cost-price squeeze over the POI
 - Raw materials costs declined relative to net sales
- Small compression in 2016 explained by increasing fixed costs unrelated to subject imports

No cost-price squeeze with raw materials in any year of the POI

Raw	materials	cost	per s	short to	on (\$)	
Raw	materials	cost	/ net	sales (percer	nt)

20	2015		2016		2017		5-17
[]	[]	[]	[]
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Source: Prehearing Report at VI-3 to VI-4, Table , Table VI-1.

Threat

No threat of material injury by reason of subject imports from Italy

- Volume of imports from Italy are not significant in isolation or relative to production and consumption
- Limited substitution between normalized Italian fittings and nonnormalized domestic fittings
- Limited potential for increasing imports from Italy
 - · Capacity utilization is high
 - Stable product mix and third country consumption
- No subsidies
- The market was tight toward the end of the POI