

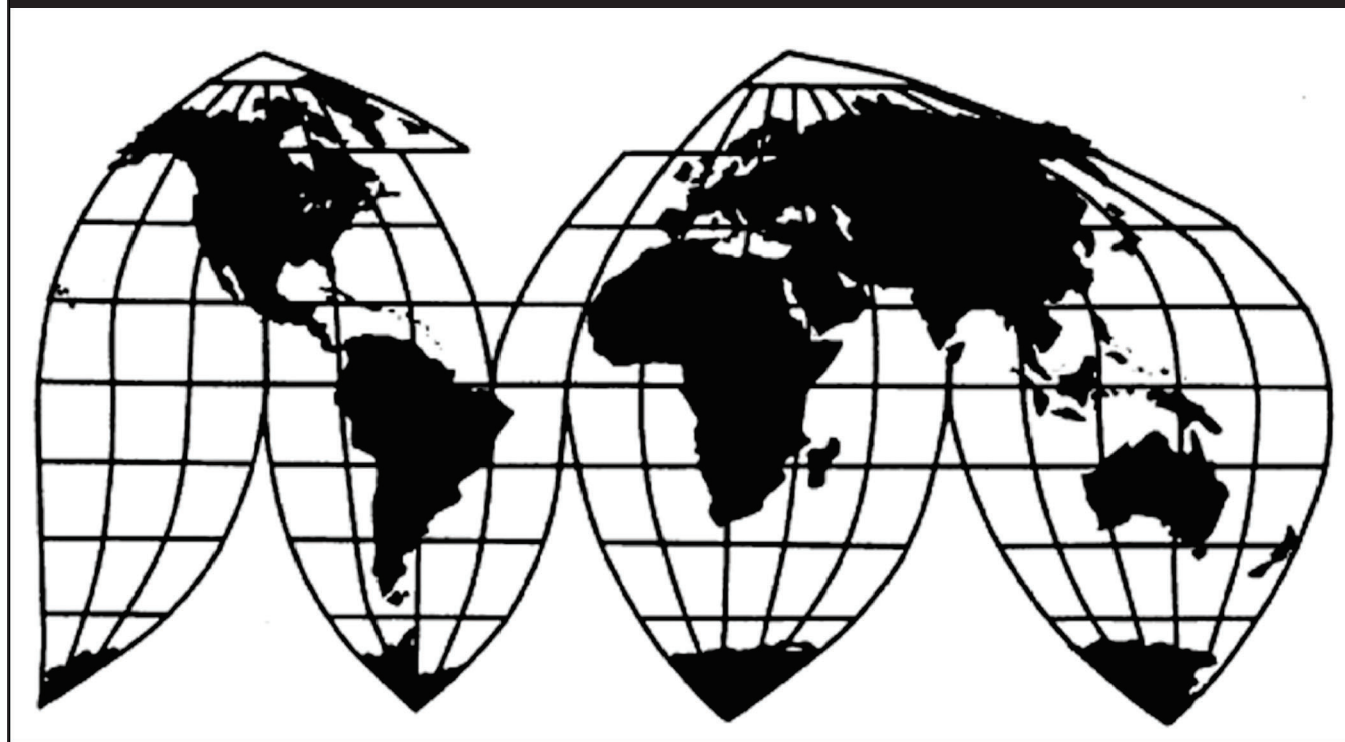
Wooden Cabinets and Vanities from China

Investigation Nos. 701-TA-620 and 731-TA-1445 (Final)

Publication 5042

April 2020

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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-620 and 731-TA-1445 (Final)

Wooden Cabinets and Vanities from China

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of wooden cabinets and vanities from China, provided for in subheadings 9403.40.90, 9403.60.80, and 9403.90.70 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and to be subsidized by the government of China.

BACKGROUND

The Commission instituted these investigations effective March 6, 2019, following receipt of petitions filed with the Commission and Commerce by the American Kitchen Cabinet Alliance. The final phase of these investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of wooden cabinets and vanities from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations 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 October 24, 2019 (84 FR 57050). The hearing was held in Washington, DC, on February 20, 2020, and all persons who requested the opportunity were permitted to appear in person or by counsel.

¹ The record is defined in sec. 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 the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of wooden cabinets and vanities from China found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value and to be subsidized by the government of China.

I. Background

The American Kitchen Cabinet Alliance (“Petitioners”), a group of U.S. producers of wooden cabinets and vanities, filed the petitions in these investigations on March 6, 2019. Petitioners appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments.

A number of respondent entities have participated in the final phase of these investigations. The following entities appeared at the hearing and submitted prehearing and posthearing briefs and final comments: the Ad Hoc Coalition of Cabinet Importers, representing 28 importers of subject merchandise (“ACCI”), the Coalition of Vanity Importers, representing two importers of subject merchandise (“Vanity Coalition”), Cabinets-to-Go, LLC, an importer of subject merchandise (“CTG”), and the China National Forestry Products Industry Association, which includes foreign producers and exporters of subject merchandise (“CNFP”).

U.S. industry data are based on the questionnaire responses from 49 firms that accounted for a substantial majority of U.S. production of wooden cabinets and vanities during 2018. U.S. import data for the value of full units are based on U.S. import statistics under Harmonized Tariff Schedule (“HTS”) statistical reporting number 9403.40.9060; U.S. import data for the quantity of full units and the value of components are based on questionnaire responses

from 84 firms that accounted for over half of imports under this HTS reporting number. Data concerning the subject industry is based on questionnaire responses from 92 foreign producers that account for the majority of the value of U.S. imports under HTS statistical reporting number 9403.40.9060.¹

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”² Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “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.”³ In turn, 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.”⁴

By statute, the Commission’s “domestic like product” analysis begins with the “article subject to an investigation,” *i.e.*, the subject merchandise as determined by Commerce.⁵

¹ Confidential Report (“CR”), Memorandum INV-SS-027 (March 12, 2020) at I-4; Public Report, *Wooden Cabinets and Vanities from China*, Inv. Nos. 701-TA-620 and 731-TA-1445 (Final), USITC Pub. 5042 (April 2020) (“PR”) at I-4.

² 19 U.S.C. § 1677(4)(A).

³ 19 U.S.C. § 1677(4)(A).

⁴ 19 U.S.C. § 1677(10).

⁵ 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of

Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”⁶ The Commission then defines the domestic like product in light of the imported articles Commerce has identified.⁷

The decision regarding the appropriate domestic like product in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.⁸ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.⁹ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁰

imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

⁶ *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, 949 F.3d 710, 714-715 (Fed. Cir. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

⁷ *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington*, 747 F. Supp. at 748–52 (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

⁸ *See, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. *See Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

⁹ *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

¹⁰ *Nippon*, 19 CIT at 455; *Torrington*, 747 F. Supp. at 748-49; *see also S. Rep. No. 96-249 at 90-91* (Congress has indicated that the like product standard should not be interpreted in “such a narrow fashion as to permit minor differences in physical characteristics or uses to lead to the conclusion that

B. Product Description

Commerce defined the scope of the imported merchandise under investigation as follows:

. . . wooden cabinets and vanities that are for permanent installation (including floor mounted, wall mounted, ceiling hung or by attachment of plumbing), and wooden components thereof. Wooden cabinets and vanities and wooden components are made substantially of wood products, including solid wood and engineered wood products (including those made from wood particles, fibers, or other wooden materials such as plywood, strand board, block board, particle board, or fiberboard), or bamboo. Wooden cabinets and vanities consist of a cabinet box (which typically includes a top, bottom, sides, back, base blockers, ends/end panels, stretcher rails, toe kicks, and/or shelves) and may or may not include a frame, door, drawers and/or shelves. Subject merchandise includes wooden cabinets and vanities with or without wood veneers, wood, paper or other overlays, or laminates, with or without non-wood components or trim such as metal, marble, glass, plastic, or other resins, whether or not surface finished or unfinished, and whether or not completed.

Wooden cabinets and vanities are covered by the investigation whether or not they are imported attached to, or in conjunction with, faucets, metal plumbing, sinks and/or sink bowls, or countertops. If wooden cabinets or vanities are imported attached to, or in conjunction with, such merchandise, only the wooden cabinet or vanity is covered by the scope.

Subject merchandise includes the following wooden component parts of cabinets and vanities: (1) wooden cabinet and vanity frames (2) wooden cabinet and vanity boxes (which typically include a top, bottom, sides, back, base blockers, ends/end panels, stretcher rails, toe kicks, and/or shelves), (3) wooden cabinet or vanity doors, (4) wooden cabinet or vanity drawers and drawer components (which typically include sides, backs, bottoms, and faces), (5) back panels and end panels, (6) and desks, shelves, and tables that are attached to or incorporated in the subject merchandise.

Subject merchandise includes all unassembled, assembled and/or "ready to assemble" (RTA) wooden cabinets and vanities, also commonly known as "flat packs," except to the extent such merchandise is already covered by the scope of antidumping and countervailing duty orders on *Hardwood Plywood from the People's Republic of China*. See *Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order*, 83

the product and article are not 'like' each other, nor should the definition of 'like product' be interpreted in such a fashion as to prevent consideration of an industry adversely affected by the imports under consideration.").

Fed. Reg. 504 (January 4, 2018); *Certain Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order*, 83 Fed. Reg. 513 (January 4, 2018). RTA wooden cabinets and vanities are defined as cabinets or vanities packaged so that at the time of importation they may include: (1) wooden components required to assemble a cabinet or vanity (including drawer faces and doors); and (2) parts (e.g., screws, washers, dowels, nails, handles, knobs, adhesive glues) required to assemble a cabinet or vanity. RTAs may enter the United States in one or in multiple packages.

Subject merchandise also includes wooden cabinets and vanities and in-scope components that have been further processed in a third country, including but not limited to one or more of the following: trimming, cutting, notching, punching, drilling, painting, staining, finishing, assembly, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope product.

Excluded from the scope of these investigations, if entered separate from a wooden cabinet or vanity are: (1) Aftermarket accessory items which may be added to or installed into an interior of a cabinet and which are not considered a structural or core component of a wooden cabinet or vanity. Aftermarket accessory items may be made of wood, metal, plastic, composite material, or a combination thereof that can be inserted into a cabinet and which are utilized in the function of organization/accessibility on the interior of a cabinet; and include: (i) Inserts or dividers which are placed into drawer boxes with the purpose of organizing or dividing the internal portion of the drawer into multiple areas for the purpose of containing smaller items such as cutlery, utensils, bathroom essentials, etc. and (ii) Round or oblong inserts that rotate internally in a cabinet for the purpose of accessibility to foodstuffs, dishware, general supplies, etc; and (2) Solid wooden accessories including corbels and rosettes, which serve the primary purpose of decoration and personalization; (3) Non-wooden cabinet hardware components including metal hinges, brackets, catches, locks, drawer slides, fasteners (nails, screws, tacks, staples), handles, and knobs; and (4) Medicine cabinets that meet all of the following five criteria are excluded from the scope: (i) Wall mounted; (ii) assembled at the time of entry into the United States; (iii) contain one or more mirrors; (iv) be packaged for retail sale at time of entry; and (v) have a maximum depth of seven inches.

Also excluded from the scope of these investigations are: (1) All products covered by the scope of the antidumping duty order on *Wooden Bedroom Furniture from the People's Republic of China*. See *Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Wooden Bedroom Furniture from the People's Republic of China*, 70 Fed. Reg. 329 (January 4, 2005); and (2) All products covered by the scope of the antidumping and countervailing duty orders on *Hardwood Plywood from the People's Republic of China* See *Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order*, 83 Fed. Reg. 504 (January 4, 2018); *Certain*

Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order, 83 Fed. Reg. 513 (January 4, 2018).

Imports of subject merchandise are classified under Harmonized Tariff Schedule of the United States (HTSUS) statistical numbers 9403.40.9060 and 9403.60.8081. The subject component parts of wooden cabinets and vanities may be entered into the United States under HTSUS statistical number 9403.90.7080. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.¹¹

Wooden cabinets and vanities are wood-constructed products that are permanently installed as cabinetry. They are designed to allow storage of, and access to, household items, such as kitchen equipment, utensils, food, toiletries, medicine, and cosmetics. Wooden cabinets and vanities encompass a wide variety of articles in many different configurations, sizes, styles, and finishes. These products are manufactured in whole or part from wood, both natural wood and engineered wood products, but they also may contain non-wood materials such as glass, vinyl, plastics, metal drawer slides, metal door hinges, organizing racks, or other accessories.¹²

Wooden cabinets are frequently categorized as stock, custom, or semi-custom cabinets. Stock cabinets generally have standard (and limited) measurements and styles; custom cabinets generally have more available styles and measurements; and semi-custom are considered as between these categories in terms of options.¹³ Although the measurements for stock cabinets

¹¹ *Wooden Cabinets and Vanities and Components Thereof from the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 85 Fed. Reg. 11,953 (Feb. 28, 2020); *Wooden Cabinets and Vanities and Components Thereof from the People's Republic of China: Final Affirmative Countervailing Duty Determination*, 85 Fed. Reg. 11,962 (Feb. 28, 2020).

¹² CR/PR at I-9-10.

¹³ CR/PR at I-9-10. Cabinets characterized as stock are generally lower priced than cabinets characterized as semi-custom or custom. *Id.*

are more limited than cabinets characterized as custom or semi-custom, cabinets characterized as stock frequently have features such as soft-close doors and roll out shelves that in the past were more commonly associated only with cabinets characterized as custom or semi-custom.¹⁴ Moreover, although there are measurements that are generally unavailable for stock cabinets,¹⁵ all measurements available for stock cabinets are also available for semi-custom and custom cabinets. As such, the size of a stock cabinet does not distinguish it from a semi-custom or custom cabinet. Further, as explained below, stock cabinets produced in the United States are mostly produced-to-order, the same as for semi-custom and custom cabinets. Some imported stock cabinets may also be produced-to-order.¹⁶ Wooden cabinets and vanities may be sold in either a fully assembled form, where the product is ready for installation, or in unassembled form, where components and items necessary for assembly are packaged together for later assembly and installation, which is referred to as flat pack or ready-to-assemble (“RTA”).¹⁷

¹⁴ Hearing Tr. at 30-31 (Klein) (“Chinese product have added features such as . . . soft close doors . . . which historically had only been offered in semi-custom U.S. made cabinets”); Hearing Tr. at 172 (Fritz) (“There was at that point, four products in stock. One product had soft close, three did not. Currently, we have five products in stock, only one does not have soft close”); Hearing Tr. at 70-71 (Wellborn) (“We’re in the semi-custom market and . . . those lines are very blurred. Most all of the importers that are bringing product in are advertising semi-custom options and modifications. There is not a lot of difference at all between those”).

¹⁵ Stock cabinets are generally available in three-inch increments, semi-custom are generally available in one-inch increments, and custom cabinets are generally available in any increment. Hearing Tr. at 181-82 (Graff); ACCI Prehearing Br. at 10, 13.

¹⁶ CR/PR at II-16.

¹⁷ CR/PR at I-10.

C. Arguments of the Parties

Petitioners argue that the Commission should define a single domestic like product that is coextensive with Commerce's scope of investigations, as it did in the preliminary determinations.¹⁸ The Vanity Coalition argues that the Commission should define a separate domestic like product for furniture-style vanities ("FSVs").^{19 20}

D. Domestic Like Product Analysis

In the preliminary determinations, the Commission defined a single domestic like product, co-extensive with the scope of investigations. It considered several issues and found that (i) under a semi-finished products analysis, wooden components and full units of cabinets and vanities encompass a single domestic like product; and (ii) under the six-factor domestic

¹⁸ Petitioners' Prehearing Br. at 3 & Exh. 3; Petitioners' Posthearing Br. at Exh. 1, 91-93.

¹⁹ In the preliminary phase, the Vanity Coalition identified characteristics that FSVs "typically" or "often" exhibited, but it did not provide a precise definition for these products. *Wooden Cabinets and Vanities from China*, Inv. Nos. 701-TA-620 and 731-TA-1445 (Preliminary), USITC Pub. 4891 (April 2019) ("Preliminary Views") at 12-13. In the final phase of these investigations, the Vanity Coalition did not file comments or otherwise timely propose a definition for FSVs. In its prehearing brief, the Vanity Coalition only generally characterized the Commission's FSV definition as differing "greatly" from the definition of cabinets and vanities. Vanity Coalition Prehearing Br. at 13; *see also* Home Depot U.S.A. Inc.'s Comments on Draft Questionnaires, EDIS Doc. 680433, at 3 (proposing a definition of FSVs); Blank Questionnaires, EDIS Doc. 692561, U.S. Producer Questionnaire at 4 (incorporating Home Depot's proposed definition of FSVs). In its posthearing brief, the Vanity Coalition suggested adding the specific phrase "without a cabinet box" to the definition of FSVs to address what it called "the key differentiator" from cabinets and vanities. Vanity Coalition Posthearing Br. at 3. We decline to consider this untimely proposed modification of the definition of FSVs.

²⁰ In the alternative to its request for FSVs to be found a separate domestic like product, the Vanity Coalition argues that FSVs do not fall within the scope of investigations and thus should not be included in a domestic like product definition coextensive with this scope. Vanity Coalition Prehearing Br. at 14. In its final determinations, however, Commerce affirmed its finding in its preliminary determination that the language of the scope is "unambiguous" and "explicitly includes" FSVs. *See* *Wooden Cabinets and Vanities and Components Thereof from the People's Republic of China: Final Scope Comments Decision Memorandum*, Comment 1, pgs. 5-7 (Feb. 21, 2020), *provided in* Petitioners' Posthearing Br. at Exh. 30. Accordingly, we find that there is no basis to the Vanity Coalition's argument that FSVs are not within the scope of investigations.

like product analysis, the record of the preliminary phase did not support clear dividing lines between any of the alleged separate domestic like products of bathroom vanities and kitchen cabinets, FSVs and other products under investigation, or hospitality furniture and other articles under investigation.²¹

In the final phase of these investigations, parties have not further addressed whether wooden components, vanities, or hospitality furniture should be considered a separate domestic like product.²² Furthermore, the available record evidence on these products in the final phase continues to support that there are not clear dividing lines between these and other products under investigation.²³ Accordingly, we continue to include each of these products in the definition of a single domestic like product, coextensive with the scope of investigations.

With respect to whether the Commission should define a separate domestic like product for FSVs, we also continue to include these products in the definition of a single domestic like product, coextensive with Commerce's scope, as explained below.

Physical Characteristics and Uses. The vast majority of U.S. producers reported that FSVs and other cabinets/vanities under investigation are “fully” or “mostly” comparable with respect to physical characteristics, and a majority of U.S. importers and plurality of purchasers

²¹ Preliminary Views, at 6-15.

²² Respondents ACCI, CTG, and CNFP did not address the definition of domestic like product in their arguments in the final phase of these investigations.

²³ CR/PR at Table F-1 (comparing cabinets and vanities, with majorities/pluralities of U.S. producers, importers and purchasers indicating that these products are “fully” comparable on most like product factors) & Table F-2 (comparing hospitality furniture and other cabinets/vanities, with majorities and pluralities of U.S. producers and purchasers indicating the products are “mostly” or “somewhat” comparable with respect to like product factor). No party advocated that the Commission define a separate domestic like product for wooden components in the preliminary determinations, nor did any party request that it gather further data on such components for consideration of a separate domestic like product in the final phase of these investigations.

indicated that such products are at least “somewhat” comparable.²⁴ The Vanity Coalition argues that FSVs are physically distinct from other cabinets on the basis that FSVs are freestanding, affixed via plumbing fixtures (rather than permanently affixed to walls or other cabinets),²⁵ and do not have a standard “cabinet box” structure.²⁶ Yet for firms identified by the Vanity Coalition as U.S. producers of FSVs, their products do not consistently exhibit these traits. For instance, Lacava’s product catalogue advertises its products as being available in either “wall-mount or free-standing versions” and as being available in varieties with what appears to be a cabinet box construction;²⁷ Strasser Woodenworks displays products that also appear to have a cabinet box construction and that are attached to other units.²⁸

While the Vanity Coalition asserts that FSVs are suitable for use only in bathrooms,²⁹ such uses nonetheless overlap with other vanities used to store toiletries, medicine, and cosmetics in bathrooms, regardless of whether these products are only used for such purposes.³⁰ Further, the majority of U.S. producers, importers, and purchasers indicated that FSVs and other products are at least “sometimes” interchangeable, indicating some degree of overlap in end uses.³¹

²⁴ CR/PR at Table F-3. Of 38 responding domestic producers, eight reported FSVs and other products as “fully” comparable with respect to physical characteristics and 24 as “mostly” comparable. Of 44 responding importers, 23 reported such products are “somewhat” comparable. Of 33 responding purchasers, 15 reported such products are “somewhat” comparable. *Id.*

²⁵ Vanity Coalition Prehearing Br. at 6-8; Vanity Coalition Posthearing Br. at 10-11.

²⁶ Vanity Coalition Posthearing Br. at 3.

²⁷ Lacava Product 2017 Product Catalogue at 28 (describing Aquatre collection), EDIS Doc. 704755.

²⁸ Strasser Woodenworks Products, EDIS Doc. 704756 (showing “Montlake” collection, which exhibits a box construction similar to that of kitchen cabinets).

²⁹ Vanity Coalition Prehearing Br. at 8.

³⁰ CR/PR at I-9-10.

³¹ CR/PR at Table F-3.

Manufacturing Facilities, Production Processes and Employees. Majorities of U.S. producers and purchasers reported that FSVs and other cabinets/vanities are “fully” or “mostly” comparable with respect to manufacturing facilities, production processes, and employees, while a plurality of U.S. importers indicated such products are “somewhat” comparable in this respect.³² During the preliminary phase, one U.S. producer indicated that it manufactured a “furniture vanity” at the same facility as other products, but that it used an “offline” manufacturing process for these products that was different from other products.³³ The Vanity Coalition asserts that the manufacturing processes for FSVs are less automated than other products under investigation,³⁴ yet one of the firms identified by the Vanity Coalition as a producer of FSVs, ***.³⁵ And while the Vanity Coalition argues that FSV production does not include construction of a cabinet box,³⁶ producers that it identified as makers of FSVs advertise products that appear to have a cabinet box construction.³⁷

Channels of Distribution. The vast majority of U.S. producers reported that FSVs and other cabinet/vanity products are “fully” or “mostly” comparable with respect to channels of

³² CR/PR at Table F-3. Of 38 responding domestic producers, 14 reported FSVs and other products as “fully” comparable with respect to manufacturing facilities, production processes, and employees, and 18 as “mostly” comparable. Of 44 responding importers, 14 reported such products are “somewhat” comparable. Of 33 responding purchasers, seven reported such products as “fully” comparable and 10 as “mostly” comparable. *Id.*

³³ Conference Tr. at 92 (Wellborn).

³⁴ Vanity Coalition Prehearing Br. at 10-11; Vanity Coalition Posthearing Br. at 11. For support, it provides (i) an affidavit from a U.S. importer concerning production processes, which does not specify whether it refers to U.S. or foreign producers and (ii) website pictures from two U.S. firms. Vanity Coalition Posthearing Br. at Exhs. 7 & 9.

³⁵ U.S. Producer Questionnaire Response, EDIS Doc. ***, at V-1(d).

³⁶ Vanity Coalition Posthearing Br. at 4-5.

³⁷ Lacava Product 2017 Product Catalogue at 37 (showing construction outline for Aquatre collection), EDIS Doc. 704755; Strasser Woodenworks Products, EDIS Doc. 704756.

purchasers indicated that such products are “somewhat” comparable.⁵² The Vanity Coalition argues that FSVs are significantly higher priced than other cabinets and vanities, comparing examples of the retail prices of individual products it terms FSVs to average quarterly values for pricing product 6a (an assembled vanity).⁵³ While it asserts that higher prices “sets FSVs apart” from other products under investigation,⁵⁴ pricing data for each of the pricing products (cabinets and vanities) collected by the Commission showed large variations in average prices between firms.⁵⁵

Conclusion. For each of the domestic like product factors, U.S. producer responses overwhelmingly report overlap between FSVs and other products under investigation. While U.S. importer and purchaser responses are more varied, pluralities or majorities of these responses nonetheless indicate that such products are at least “somewhat” comparable regarding each factor. The record, which includes data provided by *** producers of FSVs, contradicts various distinctions alleged by the Vanity Coalition with regard to channels of distribution and producer/customer perceptions. Even if FSVs tend to be higher-priced than

⁵² CR/PR at Table F-3. Of 38 responding domestic producers, six reported FSVs and other products as “fully” comparable and 24 as “mostly” comparable with respect to price. Of 44 responding importers, 17 reported such products are “somewhat” comparable. Of 33 responding purchasers, 16 reported such products are “somewhat” comparable. *Id.*

⁵³ Vanity Coalition Prehearing Br. at 11-12 & Exh. 3; Vanity Coalition Posthearing Br. at 12-13. While the Vanity Coalition alleges that the cited examples are analogous to pricing product 6a, these prices are for products made by ***, which reported in its questionnaire that ***. U.S. Producer Questionnaire, EDIS Doc. ***, at IV-2a. We also note that the individual retail prices highlighted by the Vanity Coalition are not directly analogous to the pricing data’s quarterly averages of U.S. shipments to unrelated customers, and that these prices are list prices to customers, which the Vanity Coalition acknowledges include a considerable markup from dealer prices. CR/PR at V-4; *see also* Vanity Coalition Prehearing Br. at Exh. 3.

⁵⁴ Vanity Coalition Posthearing Br. at 12.

⁵⁵ CR/PR at Figure V-10.

other wooden cabinets and vanities, they are not unique in this regard: pricing data for each product in these investigations exhibited large variations between firms, including individual firms reporting far higher quarterly average prices. Finally, as noted in the preliminary determinations, the definition of FSVs and how they are distinct from other vanities and cabinets remains unclear, given that many FSVs do not appear to have the physical characteristics highlighted by the Vanity Coalition, firms alleged by it to produce FSVs do not appear to recognize this category of product, and parties have proposed different definitions for such products over the course of investigations.⁵⁶

Accordingly, we find that the record does not support that there are clear dividing lines between FSVs and other products under investigation to define a separate domestic like product for FSVs. We define a single domestic like product coextensive with the scope of investigation.

III. Domestic Industry

The domestic industry is defined 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.”⁵⁷ In defining the domestic industry, the Commission’s general practice has been 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.

⁵⁶ Compare Vanity Coalition Prehearing Br. at 13 (agreeing with definition of FSV included in questionnaires) with Vanity Coalition Posthearing Br. at 3 (requesting that the definition be modified to add phrase “without a cabinet box”); see also Comments on Draft Questionnaires, EDIS Doc. 680433, at 3-4 (Home Depot’s proposed definition of FSV, not including any reference to cabinet box construction).

⁵⁷ 19 U.S.C. § 1677(4)(A).

A. Sufficient Production-Related Activities

In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.⁵⁸

In the preliminary determinations, the Commission found that U.S. importers' assembly of RTA flat packs in the United States did not involve sufficient production-related activity to constitute domestic production. The Commission found that U.S. importers' assembly required less technical expertise, fewer workers, added less value, and required less capital investment than manufacturing components and finishing operations.⁵⁹ In the final phase of these investigations, Petitioners continue to argue that U.S. importers engaged only in assembly in the United States do not undertake sufficient production-related activities to be part of the domestic industry,⁶⁰ and no respondent party has addressed the issue. Further, no party requested that the Commission gather further data on importers' assembly operations for the final phase of these investigations, and the record contains no new information to warrant a

⁵⁸ The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silica Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

⁵⁹ Preliminary Views at 17-18.

⁶⁰ Petitioners' Prehearing Br. at 6 & Exh. 3, 57-65. In their arguments, Petitioners emphasize that no importer has affirmatively sought to be included in the domestic industry because of its assembly operations, and it further analyzes available record evidence under each of the Commission's factors on sufficient production-related activities and argues that such evidence does not support these firms inclusion in the domestic industry. *Id.*

different finding from that in the preliminary phase. Accordingly, we continue to find that importers' assembly of RTA flat packs in the United States do not involve sufficient production-related activities to constitute domestic production.

B. Related Parties

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. 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.⁶¹ Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.⁶² We consider whether to exclude seven domestic producers under the related parties provision because they either are related to an importer of subject merchandise or imported subject merchandise during the period of investigation.⁶³

⁶¹ 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).

⁶² 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); see also *Torrington Co. v. United States*, 790 F. Supp. at 1168.

⁶³ CR/PR at Tables III-2 and III-11. The seven producers are ***, ***, ***, ***, ***, ***, and ***. *Id.* While domestic producers *** and *** reported being affiliated with U.S. importers of subject

. *** is a small producer and accounted for approximately *** percent of sales of U.S. production in 2018 and *** the petitions.⁶⁴ It reported imports of subject merchandise that totaled \$ in 2016, \$*** in 2017, \$*** in 2018, and its imports were higher in January to September 2018 (“interim 2018”) (\$***) than in January to September 2019 (“interim 2019”) (\$***).⁶⁵ Its subject imports as a share of its U.S. production was *** in 2016, *** percent in 2017, *** percent in 2018, and was higher in interim 2018 (*** percent) than in interim 2019 (*** percent).⁶⁶ It indicated that it had imported *** from subject sources.⁶⁷

*** domestic production far surpasses its limited imports of subject merchandise, and it reported that its imports were to complement its domestic production, which indicates that its primary interest lies in domestic production rather than importation. Thus, we find that appropriate circumstances do not exist to exclude it from the domestic industry under the related party provision.

. *** is a small producer and accounted for approximately *** percent of U.S. sales of domestic production in 2018, and it *** the petitions.⁶⁸ It reported imports of subject merchandise totaling \$ in 2016, \$*** in 2017, and \$*** in 2018, and its imports were higher in interim 2018 (\$***) than in interim 2019 (\$***).⁶⁹ Its imports of subject merchandise surpassed its domestic production until interim 2019. Its ratio of subject imports to domestic

merchandise, these affiliated firms reported no subject imports during the period of investigation (“POI”). CR/PR at Table III-2; U.S. Producer Questionnaire, EDIS Doc. ***; U.S. Importer Questionnaire EDIS Doc. ***.

⁶⁴ CR/PR at Table III-1.

⁶⁵ CR/PR at Table III-11.

⁶⁶ CR/PR at Table III-11.

⁶⁷ CR/PR at Table III-11.

⁶⁸ CR/PR at Table III-1.

⁶⁹ CR/PR at Table III-11.

production was *** percent in 2016, *** percent in 2017, and *** percent in 2018, and was higher in interim 2018 (*** percent) than in interim 2019 (*** percent).⁷⁰ *** reported that it maintains domestic production to ***.⁷¹

*** imports of subject merchandise surpassed its domestic production for most of the POI, although its subject imports as a share of its domestic production declined until domestic production exceeded subject imports in interim 2019. Additionally, it *** the petitions, and its description of its domestic operations would indicate these are a complement to its imports, which appears to be its primary focus rather than domestic production. We find that appropriate circumstances exist to exclude *** from the domestic industry.

. *** accounted for *** percent of sales of U.S. production in 2018 and *** the petitions.⁷² Its wholly-owned subsidiary, ***, is an importer of subject merchandise.⁷³ This subsidiary reported imports of subject merchandise totaling \$ in 2016, \$*** in 2017, and \$*** in 2018, and were slightly higher in interim 2019 (\$***) than in interim 2018 (\$***).⁷⁴ Its subsidiary's subject imports as a share of *** domestic production was low, *** percent in 2016, *** percent in 2017, and *** percent in 2018, before finishing lower in interim 2019 (*** percent) than in interim 2018 (*** percent).⁷⁵ It reported that its subsidiary imported ***.⁷⁶

⁷⁰ CR/PR at Table III-11.

⁷¹ CR/PR at Table III-11.

⁷² CR/PR at Table III-1.

⁷³ CR/PR at Table III-2.

⁷⁴ CR/PR at Table III-11.

⁷⁵ CR/PR at Table III-11.

⁷⁶ CR/PR at Table III-11.

Because *** domestic production far exceeded its subsidiary's importation, and because such imports were only for ***, it appears that its primary interest lies in domestic production. Accordingly, we find that appropriate circumstances do not exist to exclude it from the domestic industry as a related party.

. *** was ***, accounting for *** percent of U.S. sales of domestic production, and it ***.⁷⁷ It imported subject merchandise throughout the POI, \$ in 2016, \$*** in 2017, and \$*** in 2018; its imports were higher in interim 2019 (\$***) than in interim 2018 (\$***).⁷⁸ Its imports of subject merchandise as a share of domestic production was low and declined between 2016 and 2018. Its ratio of subject imports to U.S. production was *** percent in 2016, *** percent in 2017, and *** percent in 2018, although the ratio was higher in interim 2019 (***) percent) than in interim 2018 (***) percent).⁷⁹ It reported that its reason for importing subject imports was ***.⁸⁰

*** U.S. production far surpasses its imports of subject merchandise, which also declined between 2016 and 2018; it is ***, and its primary interest appears to lie with domestic production. Accordingly, we find that appropriate circumstances do not exist to exclude it from the domestic industry under the related party provision.

***. *** accounted for *** percent of U.S. sales of domestic production in 2018 and *** the petitions.⁸¹ It produces only components, not full units.⁸² Its imports of subject

⁷⁷ CR/PR at Table III-1.

⁷⁸ CR/PR at Table III-11.

⁷⁹ CR/PR at Table III-11.

⁸⁰ CR/PR at Table III-11.

⁸¹ CR/PR at Table III-1.

⁸² CR/PR at Table III-1.

merchandise during the POI totaled \$*** in 2016, \$*** in 2017, and \$*** in 2018; its imports were slightly higher in interim 2019 (\$***) than in interim 2018 (\$***).⁸³ Its ratio of imports to domestic production was low throughout the POI. Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, and *** percent in 2018, and it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).⁸⁴ It reported importing ***.⁸⁵

Because *** domestic production far exceeds its imports of subject merchandise, and its importation only seeks ***, its primary interest appears to lie in domestic production. Accordingly, we find that appropriate circumstances do not exist to exclude it from the domestic industry.

. *** accounted for *** percent of U.S. sales of domestic production in 2018, it *** the petitions, and it produces ***.⁸⁶ Its imports of subject merchandise totaled \$ in 2016, \$*** in 2017, and \$*** in 2018; its imports were \$*** in interim 2018 and \$*** in interim 2019.⁸⁷ Its ratio of subject imports to its U.S. production was also low during the POI and declined between 2016 and 2018. Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019

⁸³ CR/PR at Table III-11.

⁸⁴ CR/PR at Table III-11.

⁸⁵ CR/PR at Table III-11.

⁸⁶ CR/PR at Table III-1. It reported that its importer *** is the same company. CR/PR at Table III-

2.

⁸⁷ CR/PR at Table III-11.

(*** percent) than in interim 2018 (*** percent).⁸⁸ It reported that its imports of *** were for ***.⁸⁹

Because *** domestic production exceeds its imports of subject merchandise, its primary interest appears to lie in domestic production. Accordingly, we recommend that the Commission find that appropriate circumstances do not exist to exclude it from the domestic industry under the related party provision.

. *** and was one of the *** U.S. producers in 2018, accounting for *** percent of U.S. sales of domestic production.⁹⁰ It imported subject merchandise each year of the POI, totaling \$ in 2016, \$*** in 2017, and \$*** in 2018; its imports were higher in interim 2019 (\$***) than in interim 2018 (\$***).⁹¹ Its subject imports as a share of domestic production was low throughout the POI. Its ratio of subject imports to domestic production was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).⁹² It indicated that its reason for importing was ***.⁹³

Because its domestic production far exceeds its imports of subject merchandise, and its imports ***, *** primary interest appears to lie in domestic production. Accordingly, we find that appropriate circumstances do not exist to exclude it from the domestic industry under the related party provision.

⁸⁸ CR/PR at Table III-11.

⁸⁹ CR/PR at Table III-11.

⁹⁰ CR/PR at Table III-1.

⁹¹ CR/PR at Table III-11.

⁹² CR/PR at Table III-11.

⁹³ CR/PR at Table III-11.

In conclusion, we define the domestic industry as those U.S. producers of the domestic like product, but do not include (i) importers that assemble RTA flat packs into assembled units and (ii) ***, for which we find that appropriate circumstances exist to exclude from the domestic industry under the related party provision.

IV. Material Injury by Reason of Subject Imports⁹⁴

Based on the record in the final phase of these investigations, we find that an industry in the United States is materially injured by reason of imports of wooden cabinets and vanities from China that Commerce has found to be sold in the United States at less than fair value and to be subsidized by the government of China.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.⁹⁵ In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic

⁹⁴ Pursuant to section 771(24) of the Tariff Act, imports from a subject country that are less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petitions shall be deemed negligible. 19 U.S.C. §§ 1673b(a), 1677(24)(A)(i). Based on official import statistics (for full units) and questionnaire responses from importers (for components), the data for the March 2018 through February 2019 period preceding the filing of these petitions indicate that subject imports from China by value were 72.2 percent of total imports. CR/PR at Table IV-3. Accordingly, negligibility is not an issue in these investigations.

⁹⁵ 19 U.S.C. §§ 1671d(b), 1673d(b).

like product, but only in the context of U.S. production operations.⁹⁶ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁹⁷ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁹⁸ No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”⁹⁹

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,¹⁰⁰ it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.¹⁰¹ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports

⁹⁶ 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

⁹⁷ 19 U.S.C. § 1677(7)(A).

⁹⁸ 19 U.S.C. § 1677(7)(C)(iii).

⁹⁹ 19 U.S.C. § 1677(7)(C)(iii).

¹⁰⁰ 19 U.S.C. §§ 1671d(b), 1673d(b).

¹⁰¹ *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

are more than a minimal or tangential cause of injury and that there is a sufficient causal, not merely a temporal, nexus between subject imports and material injury.¹⁰²

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.¹⁰³ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.¹⁰⁴ Nor does

¹⁰² The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

¹⁰³ The Statement of Administrative Action for the Uruguay Round Agreements Act (“SAA”) at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); *accord Mittal Steel*, 542 F.3d at 877.

¹⁰⁴ SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he

the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.¹⁰⁵ It is clear that the existence of injury caused by other factors does not compel a negative determination.¹⁰⁶

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”¹⁰⁷ The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other

Commission need not isolate the injury caused by other factors from injury caused by unfair imports Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), citing *Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

¹⁰⁵ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

¹⁰⁶ See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

¹⁰⁷ *Mittal Steel*, 542 F.3d at 876 & 78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

sources to the subject imports.”¹⁰⁸ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”¹⁰⁹

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.¹¹⁰ Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.¹¹¹

B. Conditions of Competition and the Business Cycle

The following conditions of competition inform our analysis of whether there is material injury by reason of subject imports.

1. Data Considerations

In its preliminary determinations, the Commission relied primarily on value-based indicators because of the large variety of wooden cabinets and vanities with respect to size, style, and price.¹¹² Petitioners argue that the Commission should instead rely primarily on quantity-based indicators for its analysis in these final phase investigations; they argue that

¹⁰⁸ *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

¹⁰⁹ *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); see also *Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

¹¹⁰ We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

¹¹¹ *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, citing *U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

¹¹² Preliminary Views at 2 n.3.

value-based data are distorted by subject imports' dumping and subsidization, and that product variety for wooden cabinets and vanities is less than for products in other investigations in which the Commission relied on value-based data.¹¹³ There is, however, little record evidence to support Petitioners' assertion that wooden cabinets and vanities are concentrated in a small number of products.¹¹⁴ Further, there is no reliable unit of measurement to collect quantity data for components due to the variety of shapes, sizes, and weights of various cabinet components.¹¹⁵ Thus, we continue to rely primarily on value-based data for our analysis. However, we are mindful of limitations of using value rather than quantity measures,¹¹⁶ and we have thus also considered quantity data, based on full units, where appropriate.¹¹⁷

ACCI argues that the Commission's questionnaire data on domestic producers are incomplete and significantly understated, and it requests that the Commission measure apparent U.S. consumption and the domestic industry's U.S. shipments based on data from various industry studies.¹¹⁸ We decline to do so. The record indicates that firms accounting for

¹¹³ Petitioners' Prehearing Br. at 33-34; Petitioners' Posthearing Br. at Exh. 1, 86-87.

¹¹⁴ Petitioners comments on proposed pricing products indicated the opposite, asserting that product coverage would be low because of "the many variations of cabinet and vanity products possible." Petitioners' Comments on Draft Questionnaires, EDIS Doc. 680363, at 2.

¹¹⁵ CR/PR at IV-5 n.5 (explaining that no single unit of measurement would enable to collection of reliable data).

¹¹⁶ See, e.g., *Diamond Sawblades and Parts Thereof from China*, Inv. No. 731-TA-1092 (Review), USITC Pub. 4559 at 12 n.64 (September 2015).

¹¹⁷ We note that in some respects, quantity data for full units further complements the value data relied upon by the Commission in reaching its determinations. For example, the average unit value ("AUV") of full-unit subject imports was less than half of the AUV of the domestic industry's full unit U.S. shipments. CR/PR at Table C-5. In other instances, we note that quantity and value trends may differ. For example, whereas U.S. producers' total U.S. shipments of full units by value increased by *** percent across the period of investigation, U.S. producer's total U.S. shipments of full units by quantity decreased by *** percent across the period of investigation. CR/PR at Table C-5.

¹¹⁸ ACCI Prehearing Br. at 37 & Exhs. 2, 5, and C.

a substantial majority of domestic production have provided questionnaire responses, and ACCI has not identified further domestic producers that it believes are unaccounted for in the Commission's data.¹¹⁹ While ACCI reasons that the larger size of the U.S. market in certain industry studies supports underreporting by domestic producers, these studies themselves vary significantly in their estimates of the U.S. market size and rely on estimates or data that we find less reliable than the data provided in the certified Commission questionnaire responses on actual U.S. shipments of wooden cabinets and vanities.¹²⁰ Accordingly, we rely on data from

¹¹⁹ ACCI itself notes that the domestic industry is "dominated" by a few large producers, ACCI Prehearing Br. at 101-103 & Appx. B, 37-39, and the Commission received questionnaires from each of these large firms. CR/PR at III-1 n.1. Of any remaining producers missing from Commission data, only the Vanity Coalition identified potential such firms. *See, e.g.*, Vanity Coalition Postconference Br. at Exh. 6 (identifying alleged U.S. producers of FSVs). The Commission issued questionnaires to these firms and followed-up for further information for those not responding; of those firms that provided production and sales estimates, they accounted for *** of U.S. production in 2018. CR/PR at III-1 n.1.

¹²⁰ ACCI provides industry studies that estimate the size of the U.S. cabinet market ranging from \$*** to \$***. *See* Petitioners' Postconference Br. at Exh 2 (providing the entirety of the *** which estimates the size of the U.S. cabinet market at *** billion); ACCI's Prehearing Br. at Exh 2, 12 (providing NKBA study which estimates the size of the U.S. residential kitchen cabinet market at \$19.93 billion); ACCI's Prehearing Br. at Exh 8, 8 (providing NKBA study which estimates the size of the U.S. residential bath cabinet/vanity market (not including kitchen cabinets) at *** billion); ACCI's Prehearing Br. at Appx. C, 23 (providing DuckierFrontier study which estimates the size of the U.S. kitchen and bathroom cabinets market at \$28.9 billion). These studies estimate U.S. market size based on a series of assumptions and extrapolations that we consider less reliable than the data provided in the certified questionnaire responses collected by the Commission on actual production and shipments of U.S. cabinets within the scope of these investigations. The DuckerFrontier study relies on data for new home sales and renovations, from which it estimates the portion of these values that include wooden cabinets and vanities; the study indicates, however, that there is "no guaranty of accuracy {or} completeness" for these estimates. ACCI Prehearing Br. at Exh. C, 29. The 2018 U.S. Residential Kitchen Cabinetry Study and U.S. Residential Bathroom Cabinet Study ("NKBA Study") relies on *** to estimate the U.S. market size, and it does not appear to incorporate data from U.S. producers or importers. ACCI Prehearing Br. at Exh. 2. The Freedonia Report is based on information and data "obtained from numerous primary and secondary sources, industry participants, online databases, and other Freedonia Group studies", with primary sources comprising "consultations with marketing/technical personnel of participating companies and other industry specialists." In addition, the *** appears to include in its estimate of market size data on cabinets made of materials other than wood such as metal and glass. *See* Petitioner's Postconference Br. at Exh 2, 82-84, 95 and 152.

domestic producers' questionnaire responses in measuring apparent U.S. consumption and their U.S. shipments.

ACCI further notes that seven domestic producers submitted purchaser questionnaire responses in these investigations.¹²¹ We have considered ACCI's argument regarding these responses, but we have not found this distinction significant in these investigations.

2. Demand Considerations

Wooden cabinets and vanities are decorative forms of storage, permanently installed, and available in a wide variety of sizes and styles.¹²² Twenty-nine of 48 responding U.S. producers reported that there have been significant changes in product range, mix, and/or marketing during the POI, while 60 of 83 importers reported that there had not been a significant change.¹²³ Of those reporting a change, these changes in style included a shift toward painted cabinets (particularly white), soft-close doors and drawers, and frameless, modern cabinets.¹²⁴

Demand for wooden cabinets and vanities derives from demand for new residential construction, as well as renovation and remodeling of residential homes.¹²⁵ Wooden cabinets and vanities are used in single-family homes, multi-family housing units, as well as commercial,

We note an industry study cited by Petitioners provides an estimate of the U.S. market size that is reasonably consistent with the Commission's questionnaire data. *See* Petitioners' Prehearing Br. at Exh. 1 at 32 (***)). While domestic industry witnesses provided estimates of \$11 billion and \$10 to \$12 billion, these are much closer to the market size shown by the questionnaire data than to the studies provided by ACCI. *See* Hearing Tr. at 28 (Klein), 40 (Sabine).

¹²¹ ACCI Prehearing Br. at 67-69.

¹²² CR/PR at II-1.

¹²³ CR/PR at II-1.

¹²⁴ CR/PR at II-1-2.

¹²⁵ CR/PR at II-11. Firms also noted that general economic trends can influence demand. CR/PR at II-14.

industrial, and public buildings, with the most frequently reported end uses being for kitchen cabinets and bathroom vanities.¹²⁶ A large majority of responding firms indicated that there are no substitutes for wooden cabinets and vanities,¹²⁷ making demand for them responsive to changes in demand for residential construction and repair/renovations.¹²⁸ Most responding U.S. producers and a considerable minority of importers reported that demand for wooden cabinets and vanities is subject to a seasonal construction business cycle (*e.g.*, demand is higher in spring, summer, and fall, and lower in winter).¹²⁹

During the POI, new home construction increased by 20 percent between January 2016 and September 2019, while existing home sales were relatively steady through mid-2018, but fluctuated thereafter; the remodeling market index fluctuated, but generally increased from the first quarter of 2016 through September 2019.¹³⁰ The vast majority of U.S. producers, importers, and purchasers reported that demand for wooden cabinets and vanities increased over the POI.¹³¹

¹²⁶ CR/PR at II-12. Other reported end uses include utility storage, bedroom closets, entertainment centers, or bookshelves. *Id.*

¹²⁷ CR/PR at II-15. Of responding firms, *** U.S. producers, 78 of 82 importers, and 39 of 42 purchasers indicated that there are no substitutes for wooden cabinets and vanities. *Id.*

¹²⁸ CR/PR at II-15.

¹²⁹ CR/PR at II-12. Thirty-three of 47 U.S. producers, 31 of 82 importers, and 16 of 40 purchasers reported that wooden cabinets and vanities were subject to business cycles. *Id.*

¹³⁰ CR/PR at Figures II-1 and II-2. At all times during the POI, the remodeling index was above 50, indicating continued expansion. CR/PR at II-13 n.16.

¹³¹ CR/PR at Table II-5. Forty-one of 48 U.S. producers and 61 of 82 importers, and 29 of 41 purchasers reported that demand in the United States increased during the POI. *Id.*

Apparent U.S. consumption by value of wooden cabinets and vanities increased over the POI, from \$*** in 2016 to \$*** in 2017 and \$*** in 2018, and it was lower in interim 2019 (\$***) than in interim 2018 (\$***).¹³²

3. Supply Considerations

The domestic industry, subject imports, and nonsubject imports all supplied the U.S. market over the POI.

The domestic industry accounted for the largest market share by value over the POI, but this market share declined from *** percent in 2016 to *** percent in 2017, and to *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).¹³³ The domestic industry's annual production capacity for full units by quantity increased over the POI, from *** units in 2016 to *** units in 2017 and *** units in 2018; it was lower in interim 2019 (*** units) than in interim 2018 (*** units).¹³⁴ The domestic industry's annual capacity for full units was above apparent U.S. consumption for full units in *** but was below apparent U.S. consumption in ***.¹³⁵ Its capacity utilization declined over the POI, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was higher in interim 2019 (*** percent)

¹³² CR/PR at Table C-4. Apparent U.S. consumption of full units also increased by quantity, from *** units in 2016 to *** units in 2017 and *** units in 2018; it was lower in interim 2019 (*** units) than in interim 2018 (*** units). *Id.*

¹³³ CR/PR at Table C-4. The domestic industry also accounted for the largest, but declining, market share by quantity of full units, at *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.*

¹³⁴ CR/PR at Table C-4. As previously noted, because there is no standard unit of quantity for components, quantity-based data reflect only full units. CR/PR at III-14 n.3.

¹³⁵ CR/PR at Table C-4.

than in interim 2018 (***) percent).¹³⁶ Several firms within the U.S. industry also reported acquisitions during the POI, indicating some level of consolidation in the domestic industry.¹³⁷

Subject imports accounted for the second largest market share during the POI, with their market share increasing between 2016 and 2018. Their market share, by value, was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was lower in interim 2019 (***) percent) than in interim 2018 (***) percent).¹³⁸

Nonsubject imports accounted for the smallest market share by value over the POI, although this share increased. Their market share by value was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019 (***) percent) than in interim 2018 (***) percent).¹³⁹ The most frequently cited sources for these imports during the POI were Vietnam, Italy, Malaysia, Mexico, and the Philippines.¹⁴⁰

4. Substitutability and Other Conditions

The degree of substitutability between domestic and imported wooden cabinets and vanities depends upon factors such as price, quality, and conditions of sale (including price discounts, lead times, reliability of supply, and product services).¹⁴¹ Also affecting

¹³⁶ CR/PR at Table C-4.

¹³⁷ CR/PR at Table III-4. Four firms reported acquisitions or mergers during the POI, including ACProducts acquiring three firms, and American Woodmark acquiring one firm. *Id.*

¹³⁸ CR/PR at Table C-4. By quantity as well, subject imports accounted for the second largest market share during the POI, with this share increasing from *** percent in 2016 to *** percent in 2017, and *** percent in 2018; it was lower in interim 2019 (***) percent) than in interim 2018 (***) percent). *Id.*

¹³⁹ CR/PR at Table C-4. Nonsubject imports accounted for the smallest market share by quantity during the POI; it was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019 (***) percent) than in interim 2018 (***) percent). *Id.*

¹⁴⁰ CR/PR at II-9.

¹⁴¹ CR/PR at II-15.

substitutability is that most of the domestic products are made-to-order with longer lead times, while most subject imports are sold from inventory with shorter lead times.¹⁴²

Record evidence indicates that there is a moderate-to-high degree of substitutability between domestically produced wooden cabinets and vanities, and subject imports.¹⁴³

Majorities of responding U.S. producers, importers, and purchasers reported that domestically produced wooden cabinets and vanities and subject imports are “always” or “frequently” interchangeable.¹⁴⁴ The vast majority of responding purchasers indicated that domestically produced articles and subject imports “always” or “usually” met minimum quality specifications.¹⁴⁵

Majorities of responding purchasers reported that domestic wooden cabinets and vanities and subject imports are comparable on most purchasing factors except price, lead time for RTA units, and customization.¹⁴⁶ Responses on the significance of non-price differences

¹⁴² CR/PR at II-15.

¹⁴³ CR/PR at II-15.

¹⁴⁴ CR/PR at Table II-14. *** of *** responding U.S. producers reported that domestic wooden cabinets and vanities and subject imports are “always” or “frequently” interchangeable; 38 of 74 importers reported such products as being “always” or “frequently” interchangeable, although a plurality (31) reported such products as being “sometimes” interchangeable; 26 of 38 responding purchasers reported such products are “always” or “frequently” interchangeable. We are aware of respondents’ arguments that some purchaser responses were supplied by U.S. producers, who may have a different perspective than other purchasers. However, as noted above, we have not found it significant in these investigations. As regards to interchangeability, for example, even setting aside purchaser responses submitted by U.S. producers, a majority of the remaining purchasers (19 of 31) reported that such products are “always” or “frequently” interchangeable. *Id.*

¹⁴⁵ CR/PR at Table II-15. Of 33 responding purchasers, 14 reported that these domestic wooden cabinets and vanities “always” meet minimum quality specifications with 18 reporting “usually”; of 38 responding purchasers, 14 indicated that subject imports “always” meet minimum quality specifications and with 20 reporting “usually.” *Id.*

¹⁴⁶ CR/PR at Table II-13. Thirty-three of 40 responding purchasers reported that domestic articles are “inferior” to subject imports on price, and 19 of 33 reported that they are “inferior” on lead

were varied; majorities of U.S. producers and purchasers indicated there are “sometimes” or “never” such differences, while a majority of U.S. importers indicated that there are “always” or “frequently” such non-price differences.¹⁴⁷ U.S. purchasers asked to identify factors affecting their purchasing decisions most frequently cited price, followed by quality and lead time/delivery;¹⁴⁸ most responding purchasers indicated that price was “very important” in purchasing decisions.¹⁴⁹ We find that price is a key factor in purchasing decisions for wooden cabinets and vanities.

The majority of commercial U.S. shipments for assembled units and components from domestic producers were made-to-order, with an average lead time of 25 days, while the majority of these shipments for subject imports were from inventory, with an average lead time of 7 days.¹⁵⁰ For those shipments from inventory, lead times were similar for domestic producers and subject imports; lead times for produced-to-order units were shorter for

time for RTA units; 20 of 39 responding purchasers reported that domestic articles are “superior” to subject imports on customization. *Id.*

¹⁴⁷ CR/PR at Table II-16. Forty-three of 47 responding U.S. producers reported that non-price differences were “sometimes” or “never” significant; 58 of 78 responding U.S. importers reported that non-price differences were “always” or “frequently” significant; 20 of 39 responding U.S. purchasers indicated that non-price differences were “sometimes” or “never” significant. Setting aside purchaser responses from U.S. producers, a small majority (18 of 32) reported that non-price differences were “always” or “frequently” significant. *Id.*

¹⁴⁸ CR/PR at Table II-7. Of responding purchasers, 34 listed price as one of their top three purchasing factors, 26 listed quality, and 23 listed lead time/delivery. *Id.*

¹⁴⁹ CR/PR at Table II-8. Of 41 responding purchasers, 37 reported that price was “very” important and 4 reported “somewhat” important. Purchasers more frequently listed availability (40), reliability of supply (40), product consistency (39), quality of finish (38), and quality meets standards (38) as “very important” in purchasing factors. *Id.*

¹⁵⁰ CR/PR at II-16-17. For commercial shipments of assembled full units, 89.2 percent of U.S. producers’ shipments were made-to-order while 83.9 percent of importers’ shipments were from inventory. For commercial shipments of components, 72.9 percent of U.S. producers’ shipments were produced-to-order and 83.1 percent of importers’ shipments were from inventory. *Id.*

domestic producers than for subject imports.¹⁵¹ A plurality of responding purchasers indicated that lead times were less important than other purchasing factors such as price and quality for both assembled and RTA units.¹⁵²

Domestic producers and U.S. importers reported U.S. shipments of wooden cabinets and vanities in both assembled and unassembled/RTA units, albeit in different concentrations.¹⁵³ In 2018, *** percent of domestic producers' U.S. shipments by value were of fully assembled units and *** percent were of RTA units; 50.3 percent of U.S. importers shipments' by value were of fully assembled units, and 49.7 percent were of RTA units.¹⁵⁴ A majority of responding purchasers indicated that assembled and RTA units were available from multiple sources.¹⁵⁵ Purchaser responses on the importance of assembled versus RTA form as a

¹⁵¹ CR/PR at II-16-17. For commercial shipments from inventory of assembled units, domestic producers and importers both reported lead times averaging seven days; for commercial shipments from inventory of components domestic producers reported lead times were between 0.5 and five days and importers' lead times ranged from one to 14 days (except one importer which reported 28 days). For commercial shipments of assembled units that were produced-to-order, domestic producers reported lead times averaging 25 days and U.S. importers reported 59 days; for components domestic producers reported lead times from 3.2 to 35 days and importers' lead times ranged from 90 to 120 days. As noted above, most domestic cabinets and vanities are produced-to-order whereas most subject imports are sold from inventory. *Id.*

¹⁵² When asked to rank purchasing factors, 23 responding purchasers indicated that lead time/delivery was an important purchasing factor, fewer than those reporting price/cost (34) and quality (26). CR/PR at Table II-7. When asked to rate the importance of purchasing factors, purchasers identified lead time as very important (25 for assembled units and 19 for unassembled units) less often than factors such as availability, reliability of supply, product consistency, quality of finish, quality meets industry standards, and price. CR/PR at Table II-8.

¹⁵³ See CR/PR at Table III-9 (domestic producers' U.S. shipments by assembly type) and Table IV-5 (importers' U.S. shipments by assembly type).

¹⁵⁴ CR/PR at Figure IV-3. Purchasers who act as distributors or retailers were asked how often they assemble RTA flat pack cabinets and vanities. Of 19 responding purchasers that act as distributors or retailers, nine indicated that they "always" or "usually" assemble RTA units before shipping to customers, while 10 indicated that they "sometimes" or "never" assemble RTA units before shipping. CR/PR at II-18.

¹⁵⁵ CR/PR at II-19. Only 12 of 40 responding purchasers indicated that certain forms of wooden cabinets and vanities are available only from certain sources, with these most frequently indicating that

purchasing factor were mixed. While a majority of responding purchasers reported that they would “never” consider purchasing assembled and RTA units for the same project,¹⁵⁶ purchasers ranked product form (fully assembled or RTA) as less important than numerous other purchasing factors, including availability, reliability of supply, and product consistency.¹⁵⁷ Domestic producers and U.S. importers of subject merchandise reported similar lead times for RTA units,¹⁵⁸ and purchasers ranked the importance of lead time for assembled and RTA units as less important than numerous other purchasing factors.¹⁵⁹

Both domestic producers and U.S. importers of subject merchandise reported U.S. shipments of wooden cabinets and vanities to each channel of distribution in roughly similar

RTA units are available only from subject imports. One purchaser, however, indicated that RTA units are available from domestic producers. *Id.*

¹⁵⁶ CR/PR at II-19. Twenty of 36 responding purchasers reported that they would “never” consider purchasing assembled and RTA units for the same project, with most of the remainder indicating that they would “sometimes” consider purchasing such units for the same project. *Id.*

¹⁵⁷ CR/PR at Table II-8. Of 38 responding purchasers, 19 reported that form (assembled or RTA) was “very important”, seven “somewhat important,” and 12 “not important” (or nine purchasers indicated “not important” when setting aside those purchaser responses from U.S. producers). Factors more frequently ranked as very important by purchasers include availability (40), reliability of supply (40), product consistency (39), quality of finish (38), quality meets standards (38), price (37), lead time (assembled) (25), technical support (22), delivery terms (22), and packaging (21). *Id.*

¹⁵⁸ CR/PR at II-16. One domestic producer reported lead times averaging three days for RTA units from inventory and another lead times averaging 7 to 12 days, which together accounted for the vast majority of the domestic industry’s RTA U.S. shipments; U.S. importers reported lead times averaging four days for RTA units from U.S. inventory. *Id.*

¹⁵⁹ CR/PR at Table II-8. Twenty-five responding purchasers reported that lead time for assembled units was “very important” and 19 reported that lead time for RTA units was “very important,” less than availability, reliability of supply, product consistency, quality of finish, quality meets standards, and price. *Id.*

concentrations.¹⁶⁰ For either source, a plurality of U.S. shipments by value were to designers/dealers, followed by retailers, end users, and distributors.¹⁶¹

As previously noted, wooden cabinets and vanities are frequently characterized as stock, semi-custom, or custom.¹⁶² The vast majority of purchasers indicated that products from each of these categories are available from domestic producers; a majority further indicated that semi-custom and stock cabinets are available from subject imports, while they were more divided on the availability of custom cabinets from subject imports.¹⁶³ The vast majority of

¹⁶⁰ We address respondents' arguments that there is attenuated competition between subject imports and the domestic product based on differences in form, lead time, and channels of distribution below.

¹⁶¹ CR/PR at Table II-1. Domestic producers' U.S. shipments by value to designers/dealers were *** percent of shipments in 2016, *** percent in 2017, *** percent in 2018, and were steady between interim 2018 and interim 2019 (*** percent); shipments to retailers were *** percent of U.S. shipments in 2016, *** percent in 2017, and *** percent in 2018, and were lower in interim 2019 (*** percent) than in interim 2018 (*** percent); shipments to end users were *** percent of U.S. shipments in 2016, *** percent in 2017, and *** percent in 2018, and were higher in interim 2019 (*** percent) than in interim 2018 (*** percent); shipments to distributors were *** percent in 2016, *** percent in 2017, and *** percent in 2018, and were lower in interim 2019 (*** percent) than in interim 2018 (*** percent). U.S. importers shipments by value to designers/dealers increased from 35.6 percent of U.S. shipments in 2016 to 37.2 percent in 2017 and 38.5 percent in 2018, and were higher in interim 2019 (45.7 percent) than in interim 2018 (40.6 percent); shipments to retailers decreased from 34.7 percent in 2016 to 35.3 percent in 2017 and 33.6 percent in 2018, and were lower in interim 2019 (28.9 percent) than in interim 2018 (31.8 percent); shipments to end users were 20.7 percent of U.S. shipments in 2017, 17.6 percent in 2017, and 17.3 percent in 2018, and were lower in interim 2019 (13.9 percent) than in interim 2018 (17.1 percent); shipments to distributors were 9.0 percent of U.S. shipments in 2016, 9.8 percent in 2017, and 10.6 percent in 2018, and were higher in interim 2019 (11.5 percent) than in interim 2018 (10.5 percent). *Id.*

¹⁶² CR/PR at I-9-10. Respondents argue that the Commission should undertake a segmented analysis of the U.S. market by separately examining stock, semi-custom, and custom cabinets. ACCI Prehearing Br. at 8-9; CNFP Prehearing Br. at 4-5; CTG Prehearing Br. at 1-2.

¹⁶³ CR/PR at Table II-11. All responding purchasers indicated that custom and semi-custom cabinets are available from domestic producers, and 35 of 40 indicated that stock cabinets are available from domestic producers. All responding purchasers indicated that stock cabinets are available from subject imports, 26 of 37 indicated that semi-custom are available from subject imports, and 19 indicated that custom are not available from subject imports while 16 indicated that they are. Even setting aside purchaser responses from U.S. producers, majorities are the same for the availability of these product types from domestic producers and subject imports. *Id.*

responding purchasers indicated that products in different categories are at least “sometimes” interchangeable with products of another category.¹⁶⁴ Purchasers ranked product features/range, the purchasing factor that might differentiate products between these categories, as a less important purchasing factor than price and quality,¹⁶⁵ and a majority of purchasers indicated that product range was only a “somewhat” important purchasing factor.¹⁶⁶

Respondents have urged the Commission to consider the market to be segmented along the categories of custom, semi-custom, and stock cabinets and offered definitions for stock, semi-custom, and custom cabinets based on the increments of dimensions in which they are available and the relative number or range of options and styles.¹⁶⁷ However, although there are measurements that are generally unavailable for stock cabinets, all measurements available

¹⁶⁴ CR/PR at Table II-10. This was particularly true in comparisons between the stock and semi-custom categories, and between semi-custom and custom categories. Thirty-three of 34 responding purchasers indicated that custom and semi-custom products are either “always,” “frequently,” or “sometimes” interchangeable; 28 of 29 indicated that semi-custom and stock products are “always,” “frequently,” or “sometimes” interchangeable, and 24 of 31 responding purchasers indicated that custom and stock products are “always,” “frequently,” or “sometimes” interchangeable. Even setting aside purchaser responses from U.S. producers, the majority of responding purchasers indicated that products in all these categories are at least “sometimes” interchangeable. *Id.*

¹⁶⁵ CR/PR at Table II-7. Nine purchasers identified product features/range as an important purchasing factor. *Id.*

¹⁶⁶ CR/PR at Table II-8. Twenty-five responding purchasers indicated that product range was a “somewhat” important purchasing factor, 13 “very important”, and three “not important.” *Id.*

¹⁶⁷ *See, e.g.*, ACCI Posthearing Br. at 2-3, 12; ACCI Prehearing Br. at 55-57; ACCI Posthearing Br. at 12. We note that ACCI has not clearly defined what it means by a “narrow range of available styles and options.” ACCI Posthearing Br. at 3. We also note that ACCI’s request that the Commission not define stock cabinets in questionnaires, but instead allow individual firms to report such products based on their own marketing, suggests that there are not consistent definitions for these categories between producers. ACCI Comments on Draft Questionnaires, EDIS Doc. 680449, at 8. While ACCI notes that the NKBA Study reports data by these product categories, the NKBA Study’s data are collected from purchasers and thus do not support ACCI’s claims that domestic producers and importers could report these products on a consistent basis. ACCI Prehearing Br. at Exh. 2.

for stock cabinets are also available for semi-custom and custom cabinets such that the dimensions of a stock cabinet do not distinguish it from a custom or semi-custom cabinet.¹⁶⁸ Moreover, while there are generally more styles for custom and semi-custom cabinets, there are overlapping styles among cabinets characterized as stock, custom and semi-custom, and styles that would be available for stock cabinets would also generally be available for custom and semi-custom cabinets.¹⁶⁹ As such, there does not appear to be a meaningful way to define a stock cabinet (versus a custom or a semi-custom cabinet) that would ensure consistent reporting by market participants. In light of the difficulty in collecting consistent data and the purchaser responses summarized above, while we acknowledge that market participants recognize the existence of stock, semi-custom, and custom categories, we do not consider the U.S. market to be segmented along the lines proposed by respondents.

Effective September 24, 2018, subject imports were subject to a 10 percent ad valorem duty pursuant to Section 301 of the Trade Act of 1974 (“Section 301 tariffs”), which increased to a 25 percent ad valorem duty effective May 10, 2019.¹⁷⁰ The majority of responding U.S. producers and purchasers, and a plurality of importers, reported that the Section 301 tariffs

¹⁶⁸ For instance, ACCI itself argues that products encompassed in the pricing data, which are defined in part based on specific dimensions, are available in each of these product categories. CR/PR at V-6; *see also* ACCI Prehearing Br. at 60.

¹⁶⁹ Hearing Tr. (Klein) at 30-31 (“Chinese product have added features such as . . . soft close doors . . . , which historically had only been offered in semi-custom U.S. made cabinets.”); Hearing Tr. (Fritz) at 172 (“There was at that point, four products in stock. One product had soft close, three did not. Currently, we have five products in stock, only one does not have soft close.”); Hearing Tr. (Wellborn) at 70-71 (“We’re in the semi-custom market and . . . those lines are very blurred. Most all of the importers that are bringing product in are advertising semi-custom options and modifications. There is not a lot of difference at all between those.”).

¹⁷⁰ CR/PR at II-6 n.11.

had not changed demand in the U.S. market.¹⁷¹ Majorities of U.S. producers and purchasers, and a plurality of U.S. importers, reported that Section 301 tariffs had not changed supply of the domestic product; a plurality of U.S. producers reported that Section 301 tariffs had not changed the supply of subject imports while a majority of U.S. importers and purchasers indicated that the supply of subject imports had decreased as a result.¹⁷² A plurality of U.S. producers reported that Section 301 tariffs had not resulted in price changes while a majority of U.S. importers and purchasers indicated that they had resulted in price increases; majorities of U.S. producers, importers, and purchasers reported that Section 301 tariffs had resulted in increased raw material costs.¹⁷³

C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the “Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹⁷⁴

¹⁷¹ CR/PR at Table II-3. *** of *** responding U.S. producers indicated that Section 301 tariffs had not changed demand, as did 28 of 73 responding importers and 19 of 32 responding purchasers. *Id.*

¹⁷² CR/PR at Table II-3. *** of *** responding U.S. producers and 17 of 31 responding U.S. purchasers reported that there had been no change in supply of domestic articles after the Section 301 tariffs came into effect; 29 of 64 responding U.S. importers reported that there had been no change in the supply of domestic products. *** of *** responding U.S. producers indicated that the supply of subject imports had not changed as a result of Section 301 tariffs, while 50 of 69 responding importers and 17 of 32 responding purchasers indicated that the supply of subject imports had decreased as a result of Section 301 tariffs. *Id.*

¹⁷³ CR/PR at Table II-3. *** of *** responding producers indicated that prices had not changed because of Section 301 tariffs, while 67 of 73 responding U.S. importers and 29 of 35 responding purchasers indicated that prices had increased as a result. *** of *** responding U.S. producers, 41 of 66 responding importers, and 19 of 33 responding purchasers indicated that Section 301 tariffs had resulted in increased raw material costs. *Id.*

¹⁷⁴ 19 U.S.C. § 1677(7)(C)(i).

The volume of subject import by value increased from \$1.0 billion in 2016 to \$1.3 billion in 2017 and \$1.6 billion in 2018, or by 53.8 percent; it was 11.1 percent lower in interim 2019 (\$967 million) than in interim 2018 (\$1.1 billion).^{175 176} Subject import volumes increased more than apparent U.S. consumption, resulting in increased market share for subject imports over the POI. Subject imports market share by value increased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was lower in interim 2019 (*** percent) than in interim 2018 (*** percent).^{177 178}

¹⁷⁵ CR/PR at Table IV-2 & IV-5. By quantity as well, subject import volumes of full units increased 46.6 percent between 2016 and 2018, from 14.8 million units in 2016 to 17.4 million in 2017, and 21.6 million in 2018; it was also 4.8 percent lower in interim 2019 (14.6 million units) than in interim 2018 (15.4 million units). *Id.*

¹⁷⁶ Petitioners argue that declines in subject import volumes between interim 2018 and interim 2019 resulted from the imposition of preliminary countervailing duties and antidumping duties in August and October 2019, respectively. Petitioner's Prehearing Brief at 30-32. We note that only the imposition of preliminary countervailing duties on August 12, 2019, falls within the interim January to September 2019 period. The monthly average value of subject imports for the first seven months of 2019 was \$110.81 million. By contrast, the monthly average value of subject imports in August and September of 2019 was \$54.44 million, or about half of the average for the first seven months. The value of subject imports in September, for which the duties were in place the entire month, was lower than the value in August, for which duties were in place for only part of the month. *Calculated from* HTS Data, EDIS Doc. 705092. Lower subject imports in August and September explain in part why the value of subject imports was lower in interim 2019 than in interim 2018.

We do not find that the increase in duties under Section 301 of the Tariff Act of 1974 from 10 to 25 per cent ad valorem on May 9, 2019, explains the decline. Subject imports in May, June, and July averaged \$127.7 million, higher than the overall average of the first seven months of 2019. Thus, we find that the declines in subject imports in interim 2019 resulted in part from the lower subject import volumes following the imposition of preliminary countervailing duties, and thus we accord less weight to data for that period in our analysis.

¹⁷⁷ CR/PR at Table C-4. By quantity, subject import market share of full units increased between 2016 and 2018, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was lower in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.*

¹⁷⁸ While respondents cite to various industry studies to argue that subject imports' market share is smaller than indicated in the questionnaire data, we explain above that we find questionnaire data to be the more appropriate source in measuring apparent U.S. consumption and market shares.

We find that subject imports volumes, and their increase, were significant in absolute terms and relative to apparent consumption in the United States.

D. Price Effects of the Subject Imports

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of the subject imports, the Commission shall consider whether

(I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹⁷⁹

As stated above, there is a moderate-to-high degree of substitutability between subject imports and the domestically produced product, and price is an important factor in purchasing decisions.

In the final phase of these investigations, the Commission requested that U.S. producers and importers provide quarterly data for the total quantity and free on board value for six wooden cabinet and vanity products shipped to unrelated U.S. customers between January 2016 and September 2019, with two of these products divided

¹⁷⁹ 19 U.S.C. § 1677(7)(C)(ii).

between those shipped in assembled and RTA form.¹⁸⁰ ¹⁸¹ Thirty-one U.S. producers and 46 importers provided usable pricing data on sales of the requested products.¹⁸²

¹⁸⁰ The pricing products were: **Product 1.**—Assembled 30” width x 24” depth x 34-35” height base cabinet with three or four drawers, painted, plywood box construction, shaker style or flush face doors; **Product 2.**—Assembled 30” width x 12” depth x 30” height wall cabinet with two doors, painted, plywood box construction, shaker style or flush face doors; **Product 3.**—Assembled 36” width x 24” depth x 34-35” height sink base with two doors and one or two faux drawer faces, painted, plywood box construction, shaker style or flush face doors; **Product 4.**—Assembled 36” width x 36” depth x 34-35” height corner cabinet with lazy susan, painted, plywood box construction, shaker style or flush face doors; **Product 5a.**—Assembled 18” width x 24” depth x 34-35” height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors; and **Product 5b.**—RTA 18” width x 24” depth x 34-35” height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors; **Product 6a.**—Assembled 24” width x 21” depth x 34-35” height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors; **Product 6b.**—RTA 24” width x 21” depth x 34-35” height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors. CR/PR at V-6.

¹⁸¹ ACCI argues that the pricing products are “fatally flawed” because they do not account for market segment or channels of distribution, and because they exclude domestic products with particle board construction. *See, e.g.*, ACCI Prehearing Br. at 55-63. As explained above, however, the evidence does not support dividing the market into stock, semi-custom, and custom categories because there is not a meaningful way to define a stock cabinet (versus a custom or semi-custom cabinet) that would ensure consistent reporting by market participants. Indeed, ACCI in its proposed pricing product definitions argued that the Commission should not define these market segments but rather allow parties to report data based on their own marketing and branding, further supporting that there are not consistent product definitions for these categories. ACCI Comments on Questionnaires, EDIS Doc. 680449, at 8. Domestic producers and U.S. importers further reported similar concentrations of commercial U.S. shipments to each channel of distribution, such that these channels should not distort the pricing data. CR/PR at Table II-1. Finally, undermining its current argument, ACCI in the preliminary phase argued that “failing to identify the materials used in construction for the pricing products precludes apples-to-apples comparisons,” and it further asserted that the majority of subject imports were made of plywood. ACCI Postconference Br. at Appx. A, 35-36; *see also* Conference Tr. at 127 (Graff). Accordingly, in the final phase of these investigations, the Commission refined the pricing products to specify products made of plywood to ensure it was obtaining an apples-to-apples comparison in respect of construction materials. Because the Commission’s pricing data compare products with similar dimensions, design, and construction material, we find that they accurately provide apples-to-apples comparisons between subject imports and domestic products.

¹⁸² CR/PR at V-7. The pricing data accounted for approximately 0.7 percent of the value of the domestic producers’ U.S. shipments of full units and 1.0 percent of the value of U.S. shipments of subject imports in 2018. CR/PR at V-7. We note that wooden cabinets and vanities are available in a wide range of sizes and styles, and we consequently would expect that no pricing product would account for a large percentage of total industry shipments. While respondents argue that the Commission should rely on industry-wide price data from the Bureau of Labor Statistics because of the

The pricing data show that subject imports undersold the domestic like product in 115 of 120 quarterly price comparisons (involving *** units) and at underselling margins ranging from *** percent to *** percent, for an average of *** percent; the data further show that subject imports oversold the domestic like product in the remaining five of 120 quarterly comparisons (involving *** units) at overselling margins ranging from *** percent to *** percent, for an average of *** percent.^{183 184} Of 46 U.S. purchasers that responded to the lost sales lost revenue survey, 24 reported purchasing subject imports instead of the domestic like product, with 23 of these firms reporting that subject imports were lower priced and 18 reporting that price was a primary reason for their purchase.¹⁸⁵ U.S. purchasers

“low” coverage of the pricing products, ACCI itself has suggested that the “Commission prioritize the comparability of reported pricing product data over the broadest possible coverage so that the data are most meaningful.” ACCI Comments on Questionnaires, EDIS Doc. 680449, at 3. Accordingly, we rely primarily on the pricing data as the most probative record evidence in offering apples-to-apples comparisons, while we also consider industry-wide pricing trends where appropriate. We have also removed pricing data from various U.S. importers that contained errors, such as providing retail pricing or pricing data for products with incorrect dimensions, among other errors. CR/PR at V-7 n.9.

¹⁸³ CR/PR at Table V-12.

¹⁸⁴ The Commission also collected purchase cost data for the pricing products, and 19 importers provided usable purchase cost data, primarily for pricing products 5b and 6b. CR/PR at V-30. The record shows that the average purchase costs of subject imports were lower than the average sales prices for the domestically produced product in all 38 quarterly comparisons. CR/PR at Tables V-8, V-9, and V-10. We recognize that import purchase cost data may not reflect the total cost of importing. Consequently, the questionnaires also requested that importers provide additional estimated costs above the landed duty paid (“LDP”) value associated with their importing activities. These additional costs ranged between 0.1 and *** percent of the LDP value. It is unclear whether some of the reported additional costs of importing may also be incurred when purchasing domestically produced cabinets, and some reported costs of importing appear to cover cabinet assembly which would not be a relevant cost for purposes of pricing products 5b and 6b. In addition, importers reported an estimated margin saved by directly importing wooden cabinets and vanities ranging from 10 percent to 50 percent. CR/PR at V-30-31.

¹⁸⁵ CR/PR at Table V-14. Also, as noted above, the vast majority of responding purchasers indicated that the domestic like product was “inferior” to subject imports regarding price. CR/PR at Table II-13.

reported lost sales totaling \$***.¹⁸⁶ Given the prevalent underselling in pricing data, purchaser reports of price differences, and purchasers' confirmed lost sales, we find price underselling by subject imports to be significant.¹⁸⁷

We have also considered price trends for the domestic like product and subject imports. During the POI, prices increased for half of the domestically produced pricing products and declined for the other half; prices increased for each of the pricing products for subject imports.¹⁸⁸ Secondary data also indicate that prices for wooden cabinets and vanities were steady or increasing during the POI.¹⁸⁹ Given this evidence, we find that subject imports did not depress prices of the domestic like product to a significant degree.

¹⁸⁶ CR/PR at Table V-14. Even setting aside those U.S. purchaser responses submitted by domestic producers, purchasers reported \$*** in lost sales over the POI. *Id.*

¹⁸⁷ ACCI argues that the underselling by subject imports was not significant because prices for domestic pricing products were relatively steady and quantities increased over the POI. The evidence, however, demonstrates that the quantities of subject imports increased more than that of the domestic product in the pricing data, such that subject imports accounted for a greater percentage of reported quantities at the end of the POI than in the beginning for each of the pricing products. CR/PR at Figures V-2-8. And as noted above, purchasers have confirmed switching some purchases from the domestic product to subject imports primarily because of price, further supporting that underselling was significant. CR/PR at Table V-14. ACCI also argues that the consistent underselling indicates that the pricing data encompass products from different market segments, with subject import pricing data encompassing products in stock cabinets and domestic pricing data encompassing products in semi-custom and custom cabinets. Firm-specific average prices, however, exhibited wide ranges for both domestic producers and U.S. importers, indicating that pricing data for both sources encompass a range of product values. CR/PR at Figure V-10.

¹⁸⁸ CR/PR at Table V-11. Prices increased for domestically produced pricing products 3 (4.9 percent), 5a (8.0 percent), 5b (***) percent), and 6b (***) percent); prices decreased for domestically produced pricing products 1 (1.5 percent), 2, (10.0 percent), 4 (4.5 percent), and 6a (10.2 percent). Prices for subject imports increased for pricing products 1 (15.6 percent), 2, (9.9 percent), 3 (14.0 percent), 4 (8.8 percent), 5a (5.5 percent), 5b (18.9 percent), 6a (14.2 percent), and 6b (11.3 percent). *Id.*

¹⁸⁹ CR/PR at Figure V-11.

We have also considered whether subject imports prevented increases in prices of the domestic like product that otherwise would have occurred to a significant degree. As noted above, apparent U.S. consumption increased (by value and quantity) over the POI,¹⁹⁰ and pricing data indicate price increases for half of the pricing products and price decreases for the remaining half.¹⁹¹ The domestic industry's ratio of other factory costs to net sales increased over the POI from *** percent in 2016 to *** percent in 2018; direct labor costs to net sales also slightly increased from *** percent in 2016 to *** percent in 2018.¹⁹² These increases resulted in the domestic industry's cost of goods sold ("COGS") to net sales ratio increasing over the POI, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).^{193 194} The record therefore indicates that the domestic industry was unable to increase prices sufficiently for wooden cabinets and vanities to cover its rising costs during a period of increasing demand. Given these considerations, we find that subject imports prevented price increases for the domestic like product, which otherwise would have occurred, to a significant degree and thereby had significant price suppressing effects.

¹⁹⁰ CR/PR at Table C-4.

¹⁹¹ CR/PR at Table V-11.

¹⁹² *Calculated from* CR/PR at Table VI-1 *and* U.S. Producer Questionnaire, EDIS Doc. ***.

¹⁹³ CR/PR at Table C-4.

¹⁹⁴ ACCI argues that the domestic industry's increases in COGS to net sales ratio are not evidence of price suppression but instead are primarily the result of *** increases in other factory costs. ACCI Prehearing Br. at 52; ACCI Posthearing BR. at 13 & Appx. A, 36-37. Twenty-nine of 47 responding U.S. producers, however, reported an increase in their COGS to net sales ratio over the POI, indicating that these increases were not unique to ***. *Derived from* U.S. Producer Questionnaire Responses, at III-9a. Further, in response to questions from staff, *** reported that its increase in other factory costs was attributable to ***. CR/PR at VI-25 n.9. We find it reasonable to presume that these are types of costs that the domestic industry would otherwise have passed through in the form of higher prices if not for subject imports.

Significant and increasing volumes of subject imports significantly undersold the domestic like product over the POI. This underselling resulted in lost sales and prevented increases in prices for the domestic product that would have otherwise occurred to a significant degree. We consequently find that subject imports had significant adverse price effects.

E. Impact of the Subject Imports¹⁹⁵

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission “shall evaluate all relevant economic factors which have a bearing on the state of the industry.”¹⁹⁶ These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single

¹⁹⁵ The statute instructs the Commission to consider the “magnitude of the dumping margin” in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determination of sales at less than fair value Commerce found dumping margins ranging from 4.37 to 262.18. *See Wooden Cabinets and Vanities and Components Thereof from the People’s Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 85 Fed. Reg. 11,953 (Feb. 28, 2020). We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

¹⁹⁶ 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 (“In material injury determinations, 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 also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.”).

factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”¹⁹⁷

Increases in the domestic industry’s shipments by value each year of the POI were at a lower rate than increases in apparent U.S. consumption, which resulted in a decline in the domestic industry’s market share. Moreover, while the domestic industry’s production and financial performance were generally steady between 2016 and 2017, it experienced declines in performance in 2018.

The domestic industry’s market share by value declined during the POI, from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).¹⁹⁸ While the industry’s capacity increased over the POI,¹⁹⁹ its capacity utilization declined.²⁰⁰ The domestic industry’s U.S. shipments²⁰¹ by

¹⁹⁷ 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

¹⁹⁸ CR/PR at Table C-4. By quantity as well, the domestic industry’s market share of full units declined from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.*

¹⁹⁹ The domestic industry’s capacity increased each year of the POI, from *** units in 2016 to *** units in 2017, and to *** units in 2018; it was lower in interim 2019 (*** units) than in interim 2018 (*** units). CR/PR at Table C-4.

²⁰⁰ The domestic industry’s capacity utilization was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was lower in interim 2019 (*** percent) than in interim 2018 (*** percent). CR/PR at Table C-4. ACCI argues that domestic producers have overstated their production capacity by failing to account for reported labor shortages in their calculations, which it argues also results in understated capacity utilization rates. The vast majority of responding U.S. producers (*** of *** firms), however, reported that they were able to add additional shifts or work longer hours with existing levels of employment, indicating that reported production capacities are not significantly impacted by any labor constraints. CR/PR at III-14-15. The majority of responding full-unit producers reported capacity based on ***, and *** out of *** producers calculated capacity based on workers working *** shift. Petitioners’ Posthearing Br. at Exh 1, 53-54. Accordingly, we find ACCI’s claim to be without merit.

²⁰¹ The domestic industry’s U.S. shipments by value increased from \$*** in 2016 to \$*** in 2017 and \$*** in 2018; they were also higher in interim 2019 (\$***) than in interim 2018 (\$***). By quantity of full units, the domestic industry’s U.S. shipments fluctuated, initially increasing from *** units in 2016

value increased while its production²⁰² and inventories²⁰³ fluctuated but were lower in 2018 than in 2016.^{204 205}

Most employment-related indicators for the domestic industry improved between 2016 and 2018; some indicators were lower in interim 2019 than in interim 2018. Specifically, the number of production-related workers (“PRWs”), total hours worked, and wages paid increased between 2016 and 2018 but were lower in interim 2019 than in interim 2018; hourly wages and productivity each increased over the POI.²⁰⁶

to *** units in 2017, before declining to *** units in 2018; they were higher in interim 2019 (*** units) than in interim 2018 (*** units). CR/PR at Table C-4.

²⁰² The domestic industry’s production initially increased from *** units in 2016 to *** units in 2017, and then declined to *** units in 2018; it was higher in interim 2019 (*** units) than in interim 2018 (*** units). CR/PR at Table C-4.

²⁰³ The domestic industry’s ending value of inventories increased from \$*** in 2016 to \$*** in 2017 before declining to \$*** in 2018; ending inventories by value were lower in interim 2019 (\$***) than in interim 2018 (\$***). CR/PR at Table C-4.

²⁰⁴ The domestic industry’s export shipments by value declined from \$*** in 2016 to \$*** in 2017 and \$*** in 2018; they were lower in interim 2019 (\$***). By quantity as well, export shipments of full units declined from *** units in 2016 to *** units in 2017 and *** units in 2018; they were lower in interim 2019 (*** units) than in interim 2018 (*** units). CR/PR at Table C-4.

²⁰⁵ ACCI argues that MasterBrand’s significant revisions to data over the course of these investigations, including to its U.S. shipments, calls into question the reliability of its data. ACCI Prehearing Br. at 94-97; ACCI Posthearing Br. at Appx. A, 113-115. MasterBrand’s U.S. producer questionnaire response was verified by Commission staff. CR/VR at VI-1. The changes to the company’s data between the preliminary phase and the final phase of these investigations were reviewed and deemed reasonable. Specifically, in its preliminary phase questionnaire response, MasterBrand *** See Verification Report, EDIS Doc. 704697, at 6 n.3 ***. MasterBrand’s final phase data appropriately corrected for these issues. Second, the change to the company’s cost data was a result of verification and is appropriate – specifically, ***. See Verification Report, EDIS Doc. 704697 at 8 n.6 ***.

²⁰⁶ The domestic industry’s PRWs increased from *** in 2016 to *** in 2017 and *** in 2018; they were lower in interim 2019 (***) than in interim 2018 (***). Total hours worked increased from *** hours in 2016 to *** in 2017 and *** in 2018; they were lower in interim 2019 (*** hours) than in interim 2018 (*** hours). Wages paid increased from \$*** in 2016 to \$*** in 2017 and \$*** in 2018; they were lower in interim 2019 (\$***) than in interim 2018 (\$***). Hourly wages increased from \$*** in 2016 to \$*** in 2017 and \$*** in 2018; they were higher in interim 2019 (\$***) than in interim 2018 (\$***). Productivity increased from \$*** per hour in 2016 to \$*** in 2017 and \$*** in 2018; it was higher in interim 2019 (\$***) than in interim 2018 (\$***). CR/PR at Table C-4.

The domestic industry's financial indicators were relatively stable or increasing between 2016 and 2017 before declining in 2018, and were higher in interim 2018 than in interim 2019. Net sales by value increased throughout the POI.²⁰⁷ While the domestic industry's operating income, net income, and gross profit were positive over the POI, operating income and net income declined throughout the POI and gross profit fluctuated but finished the period lower.^{208 209} Similarly, operating income as a share of net sales declined over the POI.²¹⁰

²⁰⁷ The domestic industry's net sales by value were \$*** in 2016, \$*** in 2017, and \$*** in 2018; they were higher in interim 2019 (\$***) than in interim 2018 (\$***). By quantity of full units, however, the domestic industry's net sales initially increased from *** units in 2016 to *** units in 2017, before declining to *** units in 2018; they were higher in interim 2019 (*** units) than in interim 2018 (*** units). CR/PR at Tables C-4 and C-5.

²⁰⁸ The domestic industry's gross profit was \$*** in 2016, \$*** in 2017, and \$*** in 2018; it was lower in interim 2019 (\$***) than in interim 2018 (\$***). Its operating income was \$*** in 2016, \$*** in 2017, and \$*** in 2018; it was lower in interim 2019 (\$***) than in interim 2018 (\$***). Its net income was \$*** in 2016, \$*** in 2017, and \$*** in 2018; it was lower in interim 2019 (\$***) than in interim 2018 (\$***). CR/PR at Table C-4.

²⁰⁹ ACCI argues that declines in the domestic industry's financial performance stem from four firms' other factory costs and non-recurring expenses in 2018, and it argues that these expenses were unrelated to subject import competition. It claims that if these items were added back into operating income and net income, then the domestic industry would show only minor declines in profitability in 2018. ACCI Prehearing Br. at 92-93. We decline to credit those costs and expenses back to operating income and net income. ACCI's proposal to add these expenses back into the income for these firms could distort their financial performance. For instance, firms reporting expenses tied to acquisitions would have likely had different levels of sales and income had these acquisitions not occurred, yet ACCI's proposal does not account for these possible benefits. Additionally, certain U.S. producers also reported non-recurring gains that were unrelated to subject imports, which are incorporated into the domestic industry's performance. *See, e.g.*, U.S. Producer Questionnaire, EDIS Doc. ***, at III-10 (reporting ***); U.S. Producer Questionnaire, EDIS Doc. ***, at III-10 (reporting ***). We also note that numerous domestic producers other than those firms highlighted by ACCI reported declines in operating income and net income over the POI. CR/PR at Table VI-5 (individual firms' performance for full units) and Table VI-6 (individual firms' performance for merchant component operations). Finally, we note Petitioners' argument that a significant share of the increased costs was the result of producers' restructuring efforts in response to the inroads of subject imports into the U.S. market. Petitioners' Posthearing Brief, at 83-83 & Exh. 1.

²¹⁰ The domestic industry's operating income as a share of net sales decreased from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was also lower in interim 2019 (*** percent) than in interim 2018 (*** percent). CR/PR Table C-4.

Domestic producers' capital expenditures fluctuated but ended the POI lower, while research and development expenses were relatively steady and fluctuated within a narrow band over the POI.²¹¹ Numerous domestic producers also reported negative effects on investment and on growth and development due to subject imports.²¹²

As discussed above, low-priced subject imports increased significantly in absolute terms and relative to apparent U.S. consumption, and they significantly undersold the domestic like product and took sales and market share from the domestic industry. Moreover, we find that subject imports prevented domestic prices for wooden cabinets and vanities from increasing sufficiently to recover rising costs as demand increased. As a result, the domestic industry's financial performance declined over the POI, including with respect to operating income, net income, and gross profit. Consequently, we find that subject imports had a significant adverse impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to subject merchandise. Respondents argue that subject imports and the domestic like product do not compete such that declines in the domestic industry's performance were not caused by subject imports; the distinctions between subject imports and

²¹¹ Capital expenditures initially increased from \$*** in 2016 to \$*** in 2017 before decreasing to \$*** in 2018, the lowest level of the POI; they were also lower in interim 2019 (\$**) than in interim 2018 (\$**). Research and development expenses were \$*** in 2016, \$*** in 2017, and \$*** in 2018; they were lower in interim 2019 (\$**) than in interim 2018 (\$**). CR/PR at Table C-4.

²¹² CR/PR at Table VI-10. Forty of 49 responding U.S. producers reported negative effects on investment as a result of subject imports, including cancelled or postponed projects and reductions in capital investments. Thirty-eight of 49 responding U.S. producers reported negative effects on growth and development, including reduced ability to service debt. *Id.*

domestic product highlighted by respondents, however, do not show attenuated competition between the products. While a greater portion of U.S. shipments of subject imports are in unassembled and RTA form than those for the domestic industry, the majority of U.S. shipments for subject imports are nonetheless in assembled form.²¹³ Moreover, purchaser responses generally do not support respondents' claims that assembled or RTA/unassembled form is a significant purchasing factor.²¹⁴ Respondents argue that subject imports in RTA/unassembled form serve a "market niche" of end users prioritizing short lead times;²¹⁵ yet a plurality of commercial U.S. shipments of subject imports are to designers/retailers, not to end users,²¹⁶ and responding purchasers indicated that lead times were less important than other purchasing factors such as price and quality.²¹⁷ Finally, ACCI argues that examples of

²¹³ See CR/PR at Table III-9 (domestic producers' U.S. shipments by assembly type) and Table IV-5 (importers U.S. shipments by assembly type). And as noted above, purchasers that act as distributors reported assembling additional RTA units before sending them to customers, thus increasing the share of subject imports that is provided to end users in assembled form. CR/PR at II-18.

²¹⁴ As noted above, purchasers ranked product form (fully assembled or RTA) as less important than numerous other purchasing factors, including availability, reliability of supply, and product consistency. CR/PR at Table II-8.

²¹⁵ See, e.g., Hearing Tr. at 236 (Goldstein) (referring to such customers euphemistically as "Chuck in the truck").

²¹⁶ CR/PR at Table II-1. And as previously noted, commercial U.S. shipments for both domestic producers and subject imports have similar concentrations in each channel of distribution. *Id.*

²¹⁷ CR/PR at Table II-8. Lead times between domestically produced cabinets and subject imports shipped as assembled cabinets are the same when shipped from inventory (seven days) and shorter for domestically produced cabinets when produced-to-order. *Id.* at II-16. With respect to subject imports and domestically produced cabinets shipped as RTAs, lead times are also similar. *Id.* As between subject imports shipped as RTAs from inventory and domestically produced assembled cabinets produced-to-order, there is a difference in average lead time of approximately 21 days (four days v. 25 days). *Id.* We do not find that this difference attenuates competition between domestically produced cabinets and subject imports, particularly in light of the availability of domestically produced cabinets shipped both as assembled cabinets and as RTAs with similar lead times as subject imports shipped in the same manner, the relative importance of lead times reported by U.S. purchasers noted above, and the lack of evidence substantiating respondents' argument that there are significant numbers of end users that require a lead time of four days or less.

domestic producers' sales agreements with independent representatives support attenuated competition because the domestic producers allegedly had the contractual right to prevent representatives from carrying subject imports but failed to exercise this right; yet of 34 responding U.S. producers reporting such agreements, only six indicated that such agreements included prohibitions on competing lines.²¹⁸ In conclusion, we find that distinctions highlighted by respondents do not support that there is attenuated competition between subject imports and the domestic like product.

ACCI further claims that intra-industry competition within the domestic industry caused declines in financial performance, with large firms exerting pressure on smaller firms.²¹⁹ The Commission invited interested parties to suggest methods for the Commission to collect data on intra-industry competition,²²⁰ but neither ACCI nor any other party provided suggestions in their comments on draft questionnaires. Thus, there is limited information on this issue other than ACCI's unsupported claims and no evidence of any change over the POI. The record, however, demonstrates that declines in the domestic industry's market share and performance resulted from significant and increasing volumes of low-priced subject imports. Furthermore, even if intra-industry competition were evident, this could not explain the loss of market share to subject imports.

²¹⁸ CR/PR at II-22. U.S. producers *** reported that their sales agreements prohibited representatives from offering competing lines; Petitioners submitted evidence indicating that *** declined to permit a representative from carrying subject imports. Petitioners' Posthearing Br. at Exh. 15.

²¹⁹ ACCI Prehearing Br. at 101-105 & Appx. B, 37-39.

²²⁰ See Preliminary Views at 37 n.242.

We have also considered the role of nonsubject imports. Nonsubject imports' share of apparent U.S. consumption by value increased during the POI from *** percent in 2016 to *** percent in 2017 and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent).²²¹ These increases in market share by value, however, were far less than the increases in subject imports' market share. Moreover, the market share held by subject imports was approximately double that of nonsubject imports over much of the POI, and nonsubject imports thus cannot explain the magnitude of the domestic industry's loss of market share.²²² Accordingly, we find that nonsubject imports cannot explain the domestic industry's declining performance over the POI.

In sum, as discuss above, based on the record in these final phase investigations, we find that subject imports had a significant adverse impact on the domestic industry.

V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of wooden cabinets and vanities from China that are sold in the United States at less than fair value and that are subsidized by the government of China.

²²¹ CR/PR at Table C-4. By quantity, nonsubject imports' market share of full units was *** percent in 2016, *** percent in 2017, and *** percent in 2018; it was higher in interim 2019 (*** percent) than in interim 2018 (*** percent). *Id.*

²²² CR/PR at Table C-4. By quantity as well, nonsubject imports' market share and its increases was less than that for subject imports. The gap between subject imports' and nonsubject imports market shares narrowed somewhat between interim 2018 and interim 2019, when subject import volumes declined relative to nonsubject import volumes, but subject imports market share remained greater. *Id.*

Part I: Introduction

Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the American Kitchen Cabinet Alliance on March 6, 2019, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized and less-than-fair-value (“LTFV”) imports of wooden cabinets and vanities (“WCVs”)¹ from China. The following tabulation provides information relating to the background of these investigations.^{2 3}

Effective date	Action
March 6, 2019	Petitions filed with Commerce and the Commission; institution of Commission investigations (84 FR 8890, March 12, 2019)
March 26, 2019	Commerce’s notice of initiation of countervailing duty investigation (84 FR 12581, April 2, 2019); Commerce’s notice of initiation of less-than-fair-value investigation (84 FR 12587, April 2, 2019)
April 22, 2019	Commission’s preliminary determinations (84 FR 17890, April 26, 2019)
August 12, 2019	Commerce’s preliminary affirmative countervailing duty determination (84 FR 39798, August 12, 2019)
October 9, 2019	Commerce’s preliminary affirmative determination of sales at less than fair value (84 FR 54106, October 9, 2019)
October 9, 2019	Scheduling of final phase of Commission investigations (84 FR 57050, October 24, 2019)
February 20, 2020	Commission’s hearing
February 28, 2020	Commerce’s final determinations (85 FR 11953, February 28, 2020)
March 24, 2020	Commission’s vote
April 13, 2020	Commission’s views

¹ See the section entitled “The Subject Merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

² Pertinent Federal Register notices are referenced in appendix A and may be found at the Commission’s website (www.usitc.gov).

³ A list of witnesses who appeared at the hearing is presented in appendix B.

Statutory criteria

Section 771(7)(B) of the Tariff Act of 1930 (the “Act”) (19 U.S.C. § 1677(7)(B)) provides that in making its determinations of injury to an industry in the United States, the Commission--

shall consider (I) the volume of imports of the subject merchandise, (II) the effect of imports of that merchandise on prices in the United States for domestic like products, and (III) the impact of imports of such merchandise on domestic producers of domestic like products, but only in the context of production operations within the United States; and. . . may consider such other economic factors as are relevant to the determination regarding whether there is material injury by reason of imports.

Section 771(7)(C) of the Act (19 U.S.C. § 1677(7)(C)) further provides that--⁴

In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the imported merchandise as compared with the price of domestic like products of the United States, and (II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree. . . In examining the impact required to be considered under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.

⁴ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

In addition, Section 771(7)(J) of the Act (19 U.S.C. § 1677(7)(J)) provides that—⁵

(J) EFFECT OF PROFITABILITY.—The Commission may not determine that there is no material injury or threat of material injury to an industry in the United States merely because that industry is profitable or because the performance of that industry has recently improved.

Organization of report

Part I of this report presents information on the subject merchandise, subsidy/dumping margins, and domestic like product. Part II of this report presents information on conditions of competition and other relevant economic factors. Part III presents information on the condition of the U.S. industry, including data on capacity, production, shipments, inventories, and employment. Parts IV and V present the volume of subject imports and pricing of domestic and imported products, respectively. Part VI presents information on the financial experience of U.S. producers. Part VII presents the statutory requirements and information obtained for use in the Commission's consideration of the question of threat of material injury as well as information regarding nonsubject countries.

Market summary

WCVs are generally used for storage and easy access of various household items such as utensils and food in the case of cabinets and toiletries and other bathroom-related products in the case of vanities. The leading U.S. producers of WCVs are ***, while leading producers of WCVs in China include ***. The leading U.S. importers of WCVs from China are ***. The leading importers of WCVs from nonsubject countries are ***. U.S. purchasers of WCVs include distributors, designers or dealers, retailers, and general contractors.

⁵ Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

Apparent U.S. consumption of WCVs totaled \$*** billion in 2018. Currently, 49 firms are known to produce WCVs in the United States. U.S. producers' U.S. shipments of WCVs totaled \$7.2 billion in 2018 and accounted for *** percent of apparent U.S. consumption by value. U.S. imports from subject sources totaled \$1.6 billion in 2018 and accounted for *** percent of apparent U.S. consumption by value. U.S. imports from nonsubject sources totaled \$*** million in 2018 and accounted for *** percent of apparent U.S. consumption by value.

Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, tables C-1 through C-5. Except as noted, U.S. industry data are based on questionnaire responses of 49 firms that accounted for the substantial majority of U.S. production of WCVs during 2018. Data for the value of U.S. imports for full units are based on official U.S. import statistics under HTS statistical reporting number 9403.40.9060. Quantity data for U.S. imports, as well as import data for components are based on questionnaire responses of 84 firms that accounted for over half the value of U.S. imports under this reporting number. Based on a comparison of foreign producers' questionnaire data from 92 firms, responding producers and exporters in China accounted for the majority of the value of U.S. imports of subject product under HTS statistical reporting number 9403.40.9060, in 2018.

Previous and related investigations

WCVs have not been the subject of prior countervailing or antidumping duty investigations in the United States.

Nature and extent of subsidies and sales at LTFV

Subsidies

On February 28, 2020, Commerce published a notice in the Federal Register of its final determination of countervailable subsidies for producers and exporters of WCVs from China.⁶ Table I-1 presents Commerce's findings of subsidization of WCVs in China.

Table I-1
WCVs: Commerce's final subsidy determination with respect to imports from China

Entity	Final countervailable subsidy margin (percent)
The Ancientree Cabinet Co., Ltd.	13.33
Dalian Meisen Woodworking Co., Ltd.	18.27
Rizhao Foremost Woodwork Manufacturing Company Ltd.	31.18
Deway International Trade Co., Ltd.	293.45
Henan AiDiJia Furniture Co., Ltd.	293.45
All others	20.93

Source: 85 FR 11962, February 28, 2020.

Sales at LTFV

On February 28, 2020, Commerce published a notice in the Federal Register of its final determination of sales at LTFV with respect to imports from China.⁷ Dumping margins range from 4.37 percent assigned to The Ancientree Cabinet Co., Ltd., to 262.18 percent assigned to Dalian Meisen Woodworking Co., Ltd., as well as the China-wide entity. See Appendix D for Commerce's final LTFV margins by firm.

⁶ 85 FR 11962, February 28, 2020.

⁷ 85 FR 11953, February 28, 2020.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:⁸

The merchandise subject to this investigation consists of wooden cabinets and vanities that are for permanent installation (including floor mounted, wall mounted, ceiling hung or by attachment of plumbing), and wooden components thereof. Wooden cabinets and vanities and wooden components are made substantially of wood products, including solid wood and engineered wood products (including those made from wood particles, fibers, or other wooden materials such as plywood, strand board, block board, particle board, or fiberboard), or bamboo. Wooden cabinets and vanities consist of a cabinet box (which typically includes a top, bottom, sides, back, base blockers, ends/end panels, stretcher rails, toe kicks, and/or shelves) and may or may not include a frame, door, drawers and/or shelves. Subject merchandise includes wooden cabinets and vanities with or without wood veneers, wood, paper or other overlays, or laminates, with or without non-wood components or trim such as metal, marble, glass, plastic, or other resins, whether or not surface finished or unfinished, and whether or not completed.

Wooden cabinets and vanities are covered by the investigation whether or not they are imported attached to, or in conjunction with, faucets, metal plumbing, sinks and/or sink bowls, or countertops. If wooden cabinets or vanities are imported attached to, or in conjunction with, such merchandise, only the wooden cabinet or vanity is covered by the scope.

Subject merchandise includes the following wooden component parts of cabinets and vanities: (1) Wooden cabinet and vanity frames (2) wooden cabinet and vanity boxes (which typically include a top, bottom, sides, back, base blockers, ends/end panels, stretcher rails, toe kicks, and/or shelves), (3) wooden cabinet or vanity doors, (4) wooden cabinet or vanity drawers and drawer components (which typically include sides, backs, bottoms, and faces), (5) back panels and end panels, (6) and desks, shelves, and tables that are attached to or incorporated in the subject merchandise.

⁸ 85 FR 11953, February 28, 2020.

Subject merchandise includes all unassembled, assembled and/or “ready to assemble” (RTA) wooden cabinets and vanities, also commonly known as “flat packs,” except to the extent such merchandise is already covered by the scope of antidumping and countervailing duty orders on Hardwood Plywood from the People's Republic of China. See Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order, 83 FR 504 (January 4, 2018); Certain Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order, 83 FR 513 (January 4, 2018). RTA wooden cabinets and vanities are defined as cabinets or vanities packaged so that at the time of importation they may include: (1) Wooden components required to assemble a cabinet or vanity (including drawer faces and doors); and (2) parts (e.g., screws, washers, dowels, nails, handles, knobs, adhesive glues) required to assemble a cabinet or vanity. RTAs may enter the United States in one or in multiple packages.

Subject merchandise also includes wooden cabinets and vanities and in-scope components that have been further processed in a third country, including but not limited to one or more of the following: Trimming, Start Printed Page 11962cutting, notching, punching, drilling, painting, staining, finishing, assembly, or any other processing that would not otherwise remove the merchandise from the scope of the investigation if performed in the country of manufacture of the in-scope product.

Excluded from the scope of this investigation, if entered separate from a wooden cabinet or vanity are:

(1) Aftermarket accessory items which may be added to or installed into an interior of a cabinet and which are not considered a structural or core component of a wooden cabinet or vanity. Aftermarket accessory items may be made of wood, metal, plastic, composite material, or a combination thereof that can be inserted into a cabinet and which are utilized in the function of organization/accessibility on the interior of a cabinet; and include:

- Inserts or dividers which are placed into drawer boxes with the purpose of organizing or dividing the internal portion of the drawer into multiple areas for the purpose of containing smaller items such as cutlery, utensils, bathroom essentials, etc.*
- Round or oblong inserts that rotate internally in a cabinet for the purpose of accessibility to foodstuffs, dishware, general supplies, etc.*

(2) Solid wooden accessories including corbels and rosettes, which serve the primary purpose of decoration and personalization.

(3) Non-wooden cabinet hardware components including metal hinges, brackets, catches, locks, drawer slides, fasteners (nails, screws, tacks, staples), handles, and knobs.

(4) Medicine cabinets that meet all of the following five criteria are excluded from the scope: (1) Wall mounted; (2) assembled at the time of entry into the United States; (3) contain one or more mirrors; (4) be packaged for retail sale at time of entry; and (5) have a maximum depth of seven inches.

Also excluded from the scope of this investigation are:

(1) All products covered by the scope of the antidumping duty order on Wooden Bedroom Furniture from the People's Republic of China. See Notice of Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order: Wooden Bedroom Furniture from the People's Republic of China, 70 FR 329 (January 4, 2005).

(2) All products covered by the scope of the antidumping and countervailing duty orders on Hardwood Plywood from the People's Republic of China. See Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and Antidumping Duty Order, 83 FR 504 (January 4, 2018); Certain Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order, 83 FR. 513 (January 4, 2018).

Imports of subject merchandise are classified under Harmonized Tariff Schedule of the United States (HTSUS) statistical numbers 9403.40.9060 and 9403.60.8081. The subject component parts of wooden cabinets and vanities may be entered into the United States under HTSUS statistical number 9403.90.7080. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of this investigation is dispositive.

Tariff treatment

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is provided for under statistical reporting numbers 9403.40.9060, 9403.60.8081, and 9403.90.7080 of the Harmonized Tariff Schedule of the United States (“HTS”). The 2019 general rate of duty is free for all three statistical reporting numbers. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

Section 301 tariff treatment

Merchandise classifiable under HTS subheadings 9403.40.90, 9403.60.80, and 9403.90.70 was included among the group of products from China that, as of May 2019, are subject to an additional duty of 25 percent ad valorem, as reflected in HTS subheading 9903.88.03.⁹ Between September 24, 2018 and May 10, 2019, these subheadings were subject to an additional duty of 10 percent ad valorem.¹⁰

The product

Description and applications

WCVs are wood-constructed products used for permanently installed cabinetry that are usually found in the kitchen (in the case of cabinets) or the bathroom (in the case of vanities). WCVs have physical characteristics applicable to the intended use for storage and easy access of various household items. Typically, items for storage include kitchen equipment, utensils, and food in the case of cabinets, and toiletries, medicine, cosmetics, and other bathroom-related products in the case of vanities. In the United States, cabinets are usually “framed” (a structural frame in the front of the cabinet), while in Europe and Asia cabinets are usually “frameless,”¹¹ which provides easier access and additional space.

Wooden cabinets are generally categorized as “stock,” “custom,” or “semi-custom.” Stock cabinets have standard—and limited—measurements and styles. While not designed to

⁹ 84 FR 20459, May 9, 2019. Merchandise from China classifiable under HTS subheadings 9403.40.90, 9403.60.80, and 9403.90.70, *inter alia*, are subject to additional duty of 25 percent ad valorem, as outlined in Chapter 99 of the HTSUS, (“Temporary Legislation Providing for Additional Duties”). See HTSUS (2020) Revision 1, USITC Publication No. 5015, January 2020, pp. 99-III-21 and 99-III-44.

¹⁰ 83 FR 47974, September 21, 2018.

¹¹ Conference transcript, pp. 115-116 (Wellborn), (Trexler), and (Allen).

precisely fit a specific kitchen, they offer consumers a less expensive option than custom or semi-custom cabinets. Custom cabinets are measured and designed to fit a specific kitchen, have more available styles, and are usually more expensive than stock cabinets. Semi-custom cabinets are generally in between stock and custom cabinets, particularly in terms of the number of options and cost.¹²

WCVs may be sold in a fully assembled form, where the product is ready for installation, or in a “flat pack” or “ready to assemble” (“RTA”) form, which contains most or all of the items required to assemble a cabinet or vanity into its completed form.

WCVs are designed, manufactured, and offered for sale in various styles with the cabinets typically being designed of the same material and/or in the same finish, so that the various individual cabinets will be coordinated when installed in a kitchen or bathroom. Modular or built-in bathroom vanities include those that are manufactured to incorporate one or more sinks, as well as bathroom vanity linen closets. Wooden cabinets and vanities both encompass different individual articles (e.g., kitchen cabinets, vertical pantries, bathroom vanities) with different configurations and sizes, all of which share the physical characteristics imparted by their common primary material of natural or engineered wood. WCVs are typically intended to be permanently installed (e.g., physically affixed to a wall, permanently hung from a ceiling, permanently attached to a floor, or mated with plumbing fixtures rendering the item immobile).

WCVs are manufactured wholly or in part from wood products, including natural wood (such as ash, beech, birch, cherry, hickory, maple, oak, or poplar) and engineered wood products (including those made from wood particles, fibers, or other wooden materials such as plywood, oriented strand board, block board, particle board, medium density fiberboard, or hardboard), or bamboo. In addition to the wood components found in wooden cabinets and vanities, these products may contain certain quantities of non-wood material such as glass, vinyl, plastics, metal drawer slides, metal door hinges, organizing racks, dividers, shelves, circular turntables (known as lazy Susans), or other accessories, which are physically incorporated into cabinets and vanities. WCVs may be sold in a natural finish state (i.e., the natural-wood grain is visible and unobscured), stained, painted, coated with urethane, or covered with paper, vinyl material, phenolic film, or other obscuring coatings. The faces of a kitchen or other cabinet or vanity may be sanded, smoothed or given a “distressed” appearance through such methods as hand scraping or wire brushing.

¹² <https://kitchencabinetkings.com/glossary/>, retrieved March 26, 2019.

Manufacturing processes

The manufacturing process for WCVs requires a variety of inputs and is done in at least three phases. The first phase of production involves the collection and preparation of sheets of natural or engineered wood products which are intended as the predominant composition of a WCV. The wood can be pure hardwood (representing a variety of wood species), a plywood made from hardwood or softwood or other wood products, or an engineered wooden product, or a mix of these products. Prior to the manufacturing process, the moisture content of the wood input must be reduced, generally in kilns or using other equipment and processes.¹³ The wood is then cut to shape using a variety of wood cutting and forming machinery to form the outer faces, interior drawers, backings, cabinet frames, door frames, drawer faces, and any other component that, when assembled, constitutes a completed cabinet.

Aside from the forming of wooden components into the proper size and shape, components may be drilled, notched, punched or otherwise processed, where required. For example, a door face may be drilled for the eventual inclusion of a door handle. A door may also be beveled to allow for a finger grip where the cabinet does not contain handles. Frames can be punched for hinges and screw holes for inlaid glass inserts.

In the second phase of production, the components are typically painted, stained, coated, or overlaid with other components or coverings, yielding a finished component. The inputs here include primer, paints and stains, clear coat protective lacquers, enamels, glazing materials, vinyl, or other plastic overlay materials. At this stage, mounting and assembly hardware and components, such as hinges, screws, dowels, cams, and slides may be attached to the cabinet components.

In the third phase of production, depending on the order and customer, the finished components may be assembled into a finished cabinet that is then shipped to a customer, or the various components may be arranged in an RTA package. Under the assembled cabinet method, the finished components are joined together using fastening hardware and tools, resulting in a fully manufactured and assembled cabinet. Items such as nails, screws, glues, resins, and some of the hardware identified in the second phase are used in the final assembly of a cabinet unit. The finished cabinet unit is then packed into a shipping carton along with protective materials to prevent damage during shipping. Under the RTA method, the various finished components are carefully laid out and packaged in a large flat shipping case along with necessary hardware for assembly, including screws, dowels, hinges (if not already installed), cams, adhesive glues, slides, assembly tools (e.g., Allen keys and screwdrivers), instruction

¹³ Conference transcript, pp. 111-114 (Trexler), (Sabine), (Wellborn), and (Allen).

sheets, and packing materials. The RTA boxes are then sealed and prepared for shipment to the customer or to an assembler.

Domestic like product issues

The Commission's decision regarding the appropriate domestic product(s) that are "like" the subject imported product is based on a number of factors including: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) common manufacturing facilities, production processes, and production employees; (5) customer and producer perceptions; and, where appropriate, (6) price. Information regarding these factors is discussed below.

In its preliminary determinations, the Commission defined a single domestic like product, co-extensive with the scope of investigations. The Commission considered four issues and found that (i) under a semi-finished products analysis, wooden components encompass a single domestic like product with full units of cabinets and vanities; (ii) overlap in manufacturing processes, facilities, and employees, channels of distribution, and price did not support clear dividing lines between kitchen cabinets and bathroom vanities; (iii) respondent arguments on bathroom furniture vanities addressed imports rather than domestically produced articles, and any definition for this product was otherwise unclear; and (iv) distinctions in end users for hospitality furniture did not establish clear dividing lines between this product and others subject to investigation.¹⁴

In the final phase of these investigations, the Coalition of Vanity Importers, a respondent, assert that furniture-style vanities should be a separate like product.¹⁵ It states that furniture-style vanities are physically different from cabinets and vanities, are produced using different production processes, and are much higher priced.¹⁶ Petitioner states that WCVs constitute a single like product, co-extensive with the scope of these investigations. Petitioner states that wooden cabinets and vanities possess similar physical characteristics and uses, are interchangeable, have similar channels of distribution, are viewed as a single continuum of product, are manufactured in common facilities, and are comparably priced.¹⁷ The petitioner also states that the domestic like product should also include furniture-style vanities, which the

¹⁴ USITC Pub. 4891, pp. 6-15.

¹⁵ Respondent The Coalition of Vanity Importers' posthearing brief, p. 1.

¹⁶ Ibid., pp. 2, 8-13.

¹⁷ Petitioner's posthearing brief at Exhibit 1, pp. 91-93.

petitioner states do not have any meaningful differences from other WCVs.¹⁸ Additional information on domestic like product issues is contained in Appendixes E and F of this report.

¹⁸ Ibid., pp. 93-113.

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

U.S. market characteristics

WCVs are designed, manufactured, and offered for sale in various styles, with cabinets typically designed using the same material and/or in the same finish so that the various individual cabinets will be coordinated when installed in a kitchen or bathroom. WCVs are typically intended to be installed permanently and are not designed to be moved.¹ WCVs may be imported into the United States in a fully assembled form ready for installation, or may be imported in a “ready-to-assemble” (RTA) flat pack form, which contains most or all of the items required to assemble the cabinet or vanity.² Demand for WCVs derives from new residential construction and demand for “replace and remodel” (“R&R”).³ According to petitioners, demand for WCVs has increased by 15 percent during 2016-18.⁴ U.S. producers and importers sell WCVs to distributors, retailers, designers and independent dealers, and to end users like general contractors as either stock, semi-custom, or custom cabinets.⁵ Petitioners stated that modifications or upgrades traditionally were considered custom, however these features have become standard options.⁶ Petitioners stated that fully custom cabinets are a small portion of the U.S. market (5-10 percent) while respondents stated custom cabinets account for 20 percent of the market, semi-custom cabinets account for 20 percent, and stock cabinets account for 60 percent.⁷

Most responding U.S. producers (***) reported that there has been a significant change in the product range, product mix, and/or marketing of WCVs since January 1, 2016, while most importers (60 of 83) reported that there has not been a significant change. Among the firms reporting a change, several firms reported increased demand for painted products (particularly white) and decreased demand for stained cabinets. Firms also mentioned the increasing

¹ Petition, p. 8.

² Petition, p. 9.

³ Petition, p. 28. R&R is sometimes referenced as ‘replace and remodel,’ or ‘renovation and restoration.’

⁴ Conference transcript, p. 23 (Brightbill).

⁵ Conference transcript, p. 22 (Brightbill). Petitioners described semi-custom cabinets as stock cabinets that are modified in some way. Conference transcript, p. 62 (Wellborn). Respondents described semi-custom cabinets as made-to-order cabinets from a broad set of options. Conference transcript, p. 124 (Graff).

⁶ Conference transcript, pp. 63-64 (Sabine).

⁷ Conference transcript, p. 64 (Allen) and p. 125 (Graff).

popularity of soft close doors and drawers, and increased demand for frameless, modern-looking cabinets. Several firms reported an increase in the demand for lower-priced RTA products (which are produced primarily in China).

Apparent U.S. consumption of WCVs increased by *** percent in terms of value and *** percent in terms of quantity and between 2016 and 2018. Apparent U.S. consumption was *** percent lower in January-September 2019 compared with January-September 2018 on a value basis but *** on a quantity basis. U.S. producers reported an increase in the value of their shipments of 4.1 percent from 2016-18, but a decrease in the quantity of their shipments of *** percent. U.S. producers' shipments were *** percent higher by value in January-September 2019 than in January-September 2018, and *** percent higher on a quantity basis. Subject imports increased in both value and quantity terms, by *** percent and *** percent, respectively, between 2016 and 2018. Subject imports were *** percent lower by value in January-September 2019 compared with the same period in 2018 and were less than *** percent lower by quantity.

U.S. purchasers

The Commission received 43 usable questionnaire responses from firms that had purchased WCVs during January 2016-September 2019.^{8 9} Fourteen responding purchasers are distributors, 17 are retailers, 10 are designer/dealers, 5 are contract builders, and 9 are manufacturers, cooperatives, and a supplier to “apartment buildings”. In general, responding U.S. purchasers were headquartered in all regions of the continental United States. Large purchasers of WCVs include (in order of size) ***.¹⁰ Twenty-seven of 34 responding purchasers reported that their customers include general contractors, 21 sell to homeowners, 20 sell to single-family home builders, 16 to designer/dealers, 15 to multi-family dwelling builders, and 3 to other types of purchasers.

⁸ The following firms provided purchaser questionnaire responses: ***. Seven of the 43 purchasers also are U.S. producers – ***.

⁹ Of the 39 responding purchasers, 28 purchased domestic WCVs, 33 purchased imports of the subject merchandise from China, 10 purchased imports of WCVs from nonsubject countries, and 3 purchased from unknown sources.

¹⁰ This includes both purchases and imports of subject product.

Channels of distribution

U.S. producers and importers of the subject merchandise reported selling to all four specified channels during 2016-18 (table II-1). U.S. producers and subject importers reported selling a plurality of WCVs to designers/dealers, with a substantial portion of shipments also sold to retailers. Importers from nonsubject countries reported selling the majority of their WCVs to retailers.

Table II-1

WCVs: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			Jan. to Sept.	
	2016	2017	2018	2018	2019
Share of U.S. shipment value (percent)					
U.S. producers: All in-scope merchandise to Distributors	***	***	***	***	***
to Designers/dealers	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All in-scope merchandise from China:					
to Distributors	9.0	9.8	10.6	10.5	11.5
to Designers/dealers	35.6	37.2	38.5	40.6	45.7
to Retailers	34.7	35.3	33.6	31.8	28.9
to End users	20.7	17.6	17.3	17.1	13.9

Table continued on next page.

Table II-1–Continued

WCVs: U.S. producers' and importers' U.S. commercial shipments, by sources and channels of distribution, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			Jan. to Sept.	
	2016	2017	2018	2018	2019
	Share of U.S. shipment value (percent)				
U.S. importers: All in-scope merchandise from nonsubject countries:					
to Distributors	***	***	***	***	***
to Designers/dealers	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. producers: Full units					
to Distributors	***	***	***	***	***
to Designers/dealers	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Full units from China:					
to Distributors	10.4	11.1	11.9	11.7	12.6
to Designers/dealers	41.0	41.7	43.1	45.5	49.5
to Retailers	39.5	39.5	37.5	35.2	31.2
to End users	9.1	7.6	7.5	7.6	6.8
U.S. importers: Full units from nonsubject countries:					
to Distributors	---	***	***	---	***
to Designers/dealers	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
	Share of U.S. shipment value (percent)				
U.S. producers: Components					
to Distributors	19.8	20.7	20.4	20.2	19.7
to Designers/dealers	4.4	4.8	5.1	5.0	5.4
to Retailers	0.0	0.0	0.0	0.0	0.0
to End users	75.7	74.5	74.5	74.7	74.9
U.S. importers: Components from China:					
to Distributors	0.6	0.8	1.5	1.8	1.4
to Designers/dealers	3.6	5.7	6.7	7.0	8.6
to Retailers	6.0	6.0	7.1	8.2	6.2
to End users	89.8	87.5	84.7	83.1	83.7
U.S. importers: Components from nonsubject countries:					
to Distributors	***	***	***	***	***
to Designers/dealers	---	---	---	---	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

Note: Channels data does not reflect sales of components.

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

Geographic distribution

U.S. producers and importers reported selling WCVs to all regions in the United States, with no discernable geographic concentrations (table II-2). More than one-half of the responding U.S. producers and more than one-third of the responding importers reported selling to all U.S. regions (except Other). For U.S. producers, *** percent of sales were within 100 miles of their production facilities, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Subject importers sold 49.8 percent within 100 miles of their U.S. points of shipment, 41.2 percent between 101 and 1,000 miles, and 9.0 percent over 1,000 miles.

Table II-2
WCVs: Geographic market areas in the United States served by U.S. producers and importers

Region	U.S. producers	Importers – China
Northeast	***	51
Midwest	***	45
Southeast	***	55
Central Southwest	***	44
Mountains	***	48
Pacific Coast	***	49
Other	***	15
All regions (except Other)	***	27
Reporting firms	***	79

Note: All other U.S. markets, including AK, HI, PR, and VI.

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

Impact of the Section 301 investigations

Chinese WCVs are subject to the Section 301 tariffs implemented in September 2018, as detailed in Part I.¹¹ U.S. producers, importers, and purchasers were asked if the implementation of the Section 301 tariffs had an impact on the supply of WCVs from the United States, China, and nonsubject countries, as well as the impact on prices of WCVs, the demand for WCVs, and raw material prices of WCVs (table II-3). Most firms reported that there had been no changes in the supply of domestically produced WCVs and there had been no change in overall demand for WCVs. Most importers and purchasers indicated that the quantity of WCVs imported from China decreased since the implementation of the Section 301 tariffs, while most U.S. producers reported that there was no change in the supply of Chinese product. A majority of importers reported that the supply of WCVs from nonsubject countries had increased since the Section 301 tariff implementation; producers' and purchasers' responses were more mixed, though most reported either an increase or no change in the supply of WCVs from nonsubject countries.¹²

¹¹ On June 20, 2018, USTR provided notice of initial action in the Section 301 investigation into the acts, policies, and practices of the Chinese government related to technology transfer, intellectual property, and innovation, imposing a 25 percent ad valorem duty on certain products from China. See *Request for Comments Concerning Proposed Modification of Action Pursuant to Section 301: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 33608 (July 17, 2018). On September 21, 2018, notice was published in the Federal Register that additional products, including those imported under HTS statistical reporting number 9403.40.90 ("Furniture (o/than seats) of wood (o/than bentwood) nesoi of a kind used in the kitchen & not design. for motor vehicle use"), would be subject to a 10 percent ad valorem duty effective September 24, 2018. See *Notice of Modification of Section 301 Action: China's Acts Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation*, 83 FR 47974 (Sept. 21, 2018). This duty was raised to 25 percent ad valorem on May 10, 2019. See 84 FR 20459 (May 9, 2019).

¹² Please see Part V for a discussion on the impact of the Section 301 tariffs on raw material costs and WCV prices.

Table II-3
WCVs: Impact of the Section 301 investigations on the U.S. market

Item	Count of firms			
	Increase	No change	Decrease	Fluctuate
Supply: United States U.S. producers	***	***	***	***
Importers	8	29	11	16
Purchasers	7	17	2	5
Supply: China U.S. producers	***	***	***	***
Importers	8	7	50	4
Purchasers	5	8	17	2
Supply: Nonsubject U.S. producers	***	***	***	***
Importers	39	18	1	8
Purchasers	10	10	1	5
Prices: U.S. producers	***	***	***	***
Importers	67	4	---	2
Purchasers	29	5	---	1
Overall demand in market: U.S. producers	***	***	***	***
Importers	18	28	17	10
Purchasers	8	19	1	4
Raw materials costs: U.S. producers	***	***	***	***
Importers	41	15	1	9
Purchasers	19	9	---	5

Note: Purchaser responses from producers across the four listed categories were: 1 Increase/3 No change/1 Decrease/1 Fluctuate (1/3/1/1) for Supply: U.S.; 0/2/2/1 for Supply: China; 2/2/0/1 for Supply: Nonsubject; 4/3/0/0 for Prices; 0/6/0/0 for Overall demand in market; and 5/2/0/0 for Raw material costs.

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

Supply and demand considerations

U.S. supply

Table II-4 provides a summary of the supply factors regarding WCVs from U.S. producers and from China. Among responding firms, U.S. production capacity was almost two-and-a-half to three times larger than capacity in China during 2016-18. U.S. producers reported a decrease in capacity utilization while Chinese producers reported an increase in capacity utilization. U.S. and Chinese producers reported increased capacity, relatively low levels of inventory, and little ability to switch production from alternate products to WCVs.

Table II-4

WCVs: Supply factors that affect the ability to increase shipments to the U.S. market

Item	Capacity (millions of units)		Capacity utilization (percent)		Inventories as a ratio to total shipments (percent)		Shipments by market in 2018 (percent)		Able to shift to alternate products
	2016	2018	2016	2018	2016	2018	Home market shipments	Exports to non-U.S. markets	No. of firms reporting "yes"
United States	59.7	61.9	58.3	54.5	1.6	1.6	99.7	0.3	4 of 48
China	19.5	26.0	55.4	75.0	2.6	2.3	19.6	3.3	3 of 91

Note: Responding U.S. producers accounted for a substantial majority of U.S. production of WCVs in 2018. Responding foreign producer/exporter firms accounted for more than 60 percent of U.S. imports of WCVs from China during 2018 as well. 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."

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

Domestic production

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

U.S. producers' overall capacity increased while their total production decreased between 2016 and 2018, leading to a decrease in capacity utilization. U.S. producers' inventories remained low and unchanged during 2016-18. Domestic producers also reported very low levels of export shipments, equivalent to less than 1 percent of total shipments in 2018. Relatively few U.S. producers (4 of 48) reported being able to shift production from other products to WCVs. The four firms reporting an ability to shift production reported producing the following products on the same equipment as WCVs: hospitality furniture; architectural products and window/door components; and other wooden furniture including office furniture, vanities, cabinets, seating, and upholstered products.

Subject imports from China

Based on available information, Chinese producers of WCVs have the ability to respond to changes in demand with moderate changes in the quantity of shipments of WCVs to the U.S.

market. The main contributing factor to this degree of responsiveness of supply is the availability of unused capacity. Factors mitigating the responsiveness of supply include the limited availability of inventories, a limited ability to shift shipments from alternate markets, and a limited ability to shift production to or from alternate products.

Chinese producers' overall capacity increases were outpaced by production increases, leading to an increase in capacity utilization from 2016 to 2018. Chinese producers reported exporting to a wide variety of markets, with Canada being the most reported export market. Other export markets included countries Australia, Ethiopia, Haiti, Indonesia, Jamaica, Japan, Korea, Malaysia, Mexico, New Zealand, Singapore, Thailand, the United Arab Emirates, and the United Kingdom, as well as Africa, Europe, the Middle East, and Southeast Asia generally. Three firms reported an ability to shift production on the same equipment as WCVs; reported other products include: "furniture," interior doors, bedroom furniture, decorative solid wood moldings, wooden stairs, mirror frames, and picture frames. Factors affecting foreign producers' ability to shift production include machinery limitations, machinery upgrades, and considerable time and money needed to retool equipment and retrain workers. Chinese producer *** reported that it would take 8 to 10 weeks and cost around \$50,000 to change its production flow layout for new products. Chinese producer *** also noted that its machines and production lines were designed for the U.S. wooden cabinet market, and they are "not fit for any other markets."

Imports from nonsubject sources

Nonsubject imports accounted for 28.0 percent of responding importers' value of total U.S. imports during 2018. The most frequently listed nonsubject import sources during 2016-18 were Vietnam (listed by 7 firms), Italy (1 firm), Malaysia (1 firm), Mexico (1 firm), and the Philippines (1 firm). As a share of the value of apparent U.S. consumption, nonsubject imports increased from 5.5 percent in 2016 to 6.6 percent in 2018. Nonsubject imports accounted for 7.4 percent of apparent consumption by value in January-September 2019 compared to 6.6 percent in the same period in 2018.

Supply constraints

Most U.S. producers (***) and importers (48 of 83) reported that they have not refused, declined, or been unable to supply WCVs since January 1, 2016. Among the three U.S. producers reporting supply constraints, one reported that it declined to supply a small percentage of its customers due to credit concerns; one reported turning down new projects

while it increased manufacturing capacity; and one reported “internal process challenges” that constrained capacity. Among importers, firms reported the following supply constraints:¹³

- Limited availability of product or supply issues – 9 firms
- Limited availability of product due to trade actions (including the Section 301 tariffs and the preliminary tariffs in these investigations) – 7 firms
- Inability to supply within requested deadlines or timelines – 6 firms
- Inability to accept new customers – 4 firms
- Low inventories or poor inventory management – 4 firms
- Raw material shortages (alder and maple) – 2 firms
- Unable to fulfill orders of a certain cabinet size – 1 firm
- Improper forecasting of demand – 1 firm
- Factory shutdowns imposed by the Government of China – 1 firm
- Labor shortage – 1 firm
- Factory lead times – 1 firm

Twelve of 41 purchasers also reported that they had experienced supply constraints since January 1, 2016. Purchaser *** reported that MasterBrand would not add it as a customer, purchaser *** stated that producer Nation’s Cabinetry dropped it as a customer because it was not buying enough upgraded cabinets, and purchaser *** noted that there are long lead times on domestic supply. Purchaser ***, which started purchasing WCVs from China in 2017 noted that its supplier’s factory was “at capacity and could not handle any new business.” Producer *** stated it could not get components from Vietnam due to the supplier’s “‘non-compete’ relationship with a major US cabinet company who was importing components from this factory.” A number of purchasers reported these delays with respect to nonsubject countries. To wit, purchaser *** stated that cabinets and vanities are no longer available from China. Purchaser *** stated there are long lead times for product imported from Vietnam and Malaysia, and that some unreasonable minimum purchase requirements exist that did not with WCVs imported from China. *** added that its supplier, ***, stopped production in China in June 2019, and refused to supply WCVs. Purchaser *** stated that “Some firms have had a

¹³ Some firms listed multiple supply constraints, and one firm did not provide an explanation of the supply constraint it experienced.

disruption in supply chain as they shift to countries outside of China, which has made them unable to meet forecasted demand quantities and led to high out of stock rates.”

Twenty-seven of 41 responding purchasers indicated that the availability of supply from domestic sources had not changed since January 1, 2016. Responses differed with respect to imports, however. A majority of responding purchasers (29 of 41) reported a change in availability of WCVs from China, and a substantial minority (14 of 30) reported a change with respect to imports from nonsubject countries. Whereas purchasers’ response were mixed with respect to China (generally an increase in availability, but a decrease since tariffs were imposed), most purchasers indicating a change in nonsubject WCV availability reported an increase. Purchaser *** noted that “For furniture style vanities, however, the quality and availability of the product out of China is far superior to the {United States}, which has little to no commercial production of {them}.”

New suppliers

Sixteen of 40 responding purchasers indicated that new suppliers entered the U.S. market since January 1, 2016. Purchasers cited Bestsign International, Binli, Bonke, Dorel Home Furnishings, Fabuwood (China), GoldenHome, Highbury Furnishings, JSI cabinetry (China), Mantra, PTS America, and SHKL. Several firms also reported there were new sources from China, but only one purchaser reported both new suppliers and a new country.

U.S. demand

Based on available information, the overall demand for WCVs is likely to experience small-to-moderate changes in response to changes in price. Demand for WCVs derives from new residential construction and demand for renovation and remodeling. Purchases of WCVs for a kitchen or bathroom remodel is a discretionary purchase. According to an industry study conducted by the Freedonia Group, ***.¹⁴ The main contributing factor to this level of responsiveness is the limited use of substitute products.

¹⁴ Freedonia Group, *Cabinets Market in the U.S., 10th Edition*, September 2017, ***. Petitioners postconference brief, Exh. 2 and Ad Hoc Coalition of Cabinet Importers postconference brief, Exh. 2.

End uses and cost share

As previously noted, U.S. demand for WCVs depends on demand for new residential construction as well as in R&R.¹⁵ WCVs are used as decorative storage in single-family homes and multi-family housing units (i.e., apartment or condominium buildings) as well as commercial, industrial, and public buildings (such as office buildings, hotels, and libraries). The most frequently reported specific end uses were kitchen cabinets and bathroom vanities. Other reported uses were utility storage (such as in a garage, laundry room, or mudroom), as well as in bars, bedroom closets, or as entertainment centers or bookshelves.

Business cycles and distinct conditions of competition

Most responding U.S. producers (***) and a considerable minority of responding importers (31 of 82) and purchasers (16 of 40) reported that the market for WCVs was subject to business cycles. Most of the firms reporting business cycles indicated that the WCVs market follows seasonal construction trends, with higher demand in the spring, summer, and fall, and lower demand in the winter. In general, demand for WCVs used in new homes tends to increase during the warmer months (commonly March/April through October/November), with some producers noting that seasonality is more of a factor in northern climates. Weather and natural disasters were other seasonal market drivers. Other firms noted that general economic trends – including interest rates – can influence the WCVs market, and that tax refunds tend to drive the increase in spring sales, mostly for the R&R market.

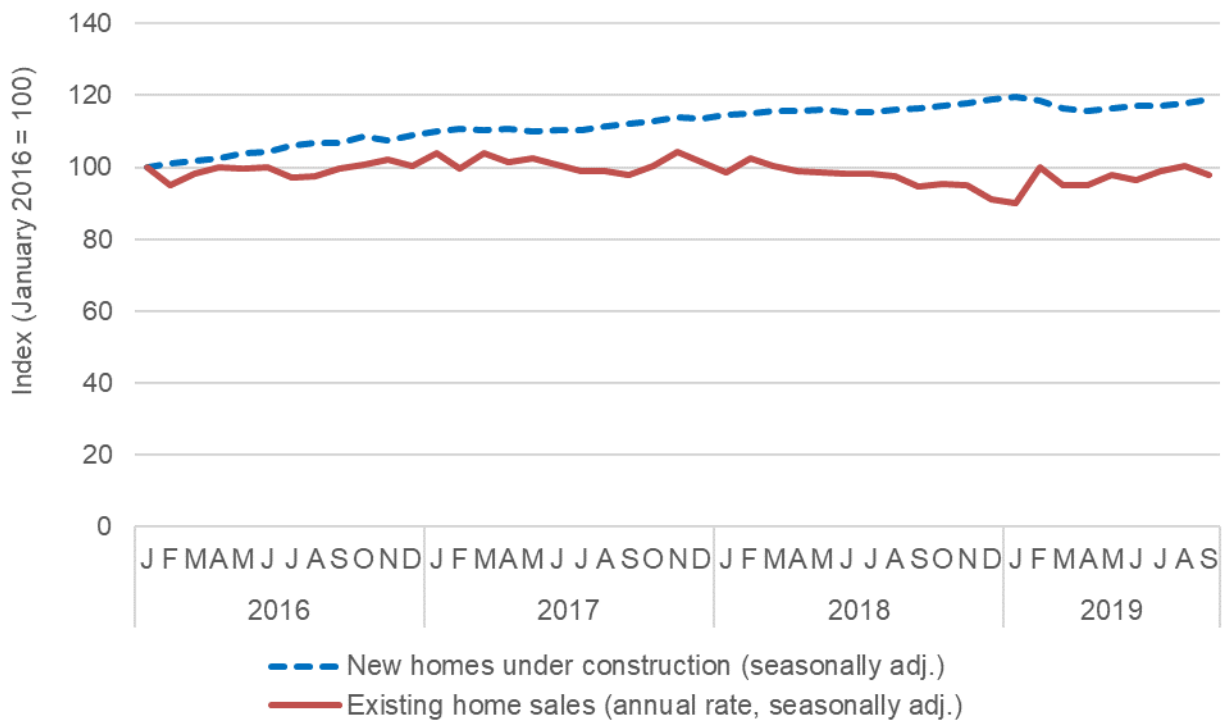
Most responding firms (***) U.S. producers, 64 of 82 importers, and 31 of 40 purchasers) reported that the WCVs market is not subject to distinct conditions of competition. One U.S. producer cited population movements from northern states to southern states as a distinct condition of competition, and another U.S. producer cited “lead times, quality, {and} style.” Among importers that reported distinct conditions of competition, several cited greater demand for consumer-focused conveniences, most notably shorter lead times, but also style and color availability, ease of experience/ordering, personalization, and flexibility. One importer also cited growth in the R&R market creating more demand for in-stock (as opposed to produced-to-order) product, and another cited an increase in domestic producers’ purchasing of Chinese components. One reported that the increase in DIY television shows has influenced end users to want projects done quickly, which increases the need for quickly available cabinetry.

¹⁵ Petition, p. 28.

Demand trends

As shown in figures II-1 and II-2, new home construction and existing home sales were relatively steady but declined overall between January 2016 and December 2018, while the remodeling market index for the R&R market increased between the first quarter of 2016 and the last quarter of 2018. The number of new privately-owned housing units under construction increased by 19.1 percent and the number of existing home sales fluctuated between January 2016 and September 2019, ending the period 2.2 percent lower. The remodeling market index also fluctuated but ended 1.7 points higher (at 55.5) between the first quarter of 2016 and the third quarter of 2019.¹⁶

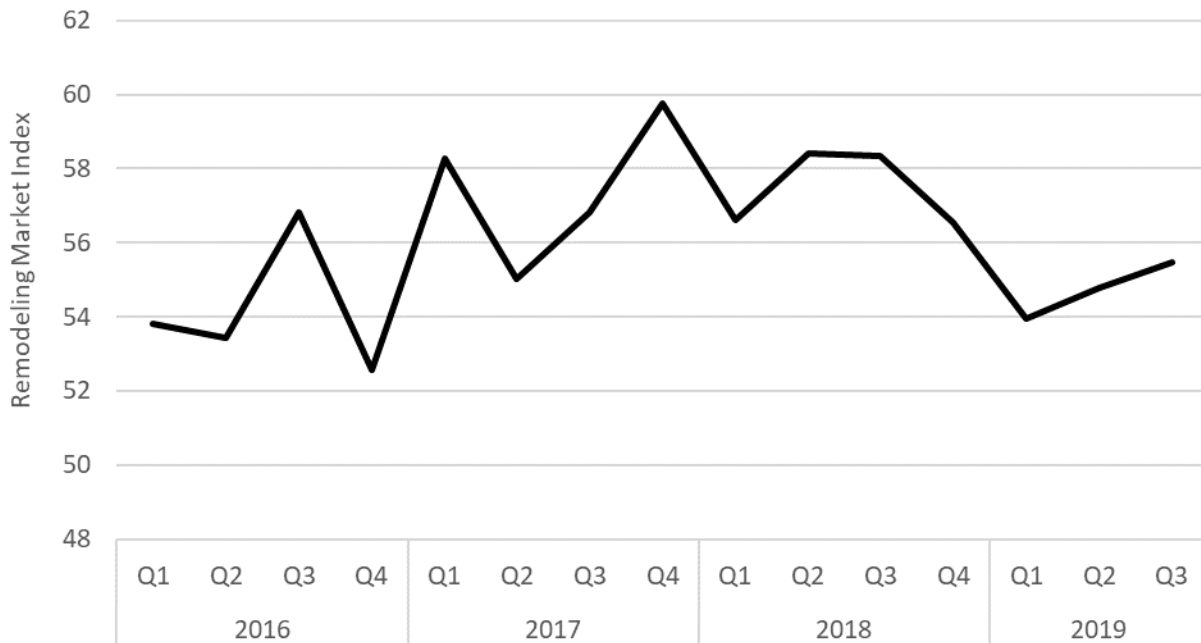
Figure II-1
Home construction and sales: Index of new privately-owned housing units under construction, seasonally adjusted and existing home sales, seasonally adjusted annual rate, monthly, January 2016-September 2019



Sources: Census Bureau, http://www.census.gov/construction/nrc/historical_data/index.html; National Association of Realtors, <http://www.realtor.org/topics/existing-home-sales>; retrieved January 21, 2020.

¹⁶ National Association of Home Builders, <https://www.nahb.org/News-and-Economics/Housing-Economics/Indices/Remodeling-Market-Index>, retrieved January 23, 2020. Any number over 50 indicates that more remodelers view market conditions as higher than the previous quarter.

Figure II-2
Remodeling market index, quarterly, January 2016-September 2019



Note: The remodeling market index (RMI) is an average of two major component indices: current market conditions and future market indicators. For more on the components and methodology of RMI, see <https://www.nahb.org/en/research/housing-economics/housing-indexes/remodeling-market-index.aspx>.

Source: National Association of Homebuilders, <https://www.nahb.org/en/research/housing-economics/housing-indexes/remodeling-market-index.aspx>, retrieved January 17, 2020.

Most U.S. producers, importers, and purchasers reported an increase in U.S. demand for WCVs since January 1, 2016 (table II-5). Pluralities also reported an increase in demand for WCVs outside the United States. Most firms cited growth in the housing market and general economic growth as explanations for the increase in demand. Purchaser *** quantified this growth: “The Kitchen Cabinet Manufacturers Association (KCMA) has reported the cabinetry industry has increased between 1-4 percent annually since 2016.” Several U.S. producers also stated that imports from China have captured a large portion of this demand increase.

Table II-5**WCVs: Firms' responses regarding U.S. demand and demand outside the United States**

Item	Increase	No change	Decrease	Fluctuate
Demand in the United States				
U.S. producers	***	***	***	***
Importers	61	4	4	13
Purchasers	29	8	1	3
Demand outside the United States				
U.S. producers	***	***	***	***
Importers	15	4	2	15
Purchasers	5	4	---	4

Note: Purchaser responses from producers across the four listed categories were: 7 increase for Demand in the United States and 1 Increase and 1 fluctuate for Demand outside the United States.

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

Substitute products

The large majority of responding firms (***) U.S. producers, 78 of 82 importers, and 39 of 42 purchasers) reported that there are no substitutes for WCVs. Firms responding affirmatively noted metal/non-wood cabinets and shelves to be substitutes, but purchaser *** stated those quantities would be “minimal.”

Substitutability issues

The degree of substitution between domestic and imported WCVs depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is moderate-to-high degree of substitutability between domestically produced WCVs and WCVs imported from China. One factor affecting substitutability is that most domestic product is produced-to-order and sold fully assembled while most subject imports are sold from inventory in RTA flat packs with shorter lead times. Other factors affecting substitutability include quality, selection, and brand preference.

Lead times¹⁷

Most fully assembled WCVs sold by U.S. producers are produced-to-order, while most importers sell from inventory. U.S. producers reported that 89.2 percent of their commercial shipments of fully assembled WCVs were produced-to-order, with lead times averaging 25 days, while importers reported that 13.5 percent were produced-to-order, with lead times averaging 59 days. In contrast, importers reported that 83.9 percent of their commercial shipments of fully assembled WCVs were from inventory, with lead times averaging 7 days, while U.S. producers reported that 10.8 percent of their commercial shipments of fully assembled WCVs were from inventory, with lead times averaging 7 days. Lead times for orders from foreign inventories of fully assembled WCVs averaged 42 days but accounted for only 2.6 percent of importers' commercial shipments of these products.

Lead times from RTA flat packs were reported by two producers: *** and ***. Shipments out of inventory accounted for *** percent of U.S. producers' RTA shipments. Importers also sold RTA flat packs mostly out of inventory (91.5 percent), with lead times averaging 4 days. Lead times for RTA flat packs sold out of inventory held in China averaged 81 days and lead times for RTA flat pack produced-to-order averaged 93 days. Respondents stated that the difference between domestically produced produced-to-order cabinets and imported RTA cabinets is an important distinction, but Petitioners stated that price was identified as a more important factor.¹⁸

Most (72.9 percent) WCV components produced in the United States were shipped on a produced-to-order basis, with the remainder shipped from inventory. Lead times for produced-to-order WCV components averaged 13 days and ranged from 3.2 to 35 days.¹⁹ Lead times for WCV components shipped from inventories for all U.S. producers but one were between 0.5 and 5 days. In contrast, most (83.1 percent) WCV components imported from China were shipped from inventory, with the remainder shipped on a produced-to-order basis. Lead times for

¹⁷ Responses of "0" lead time were not included in these tabulations, nor was ***. Also not included were two importers' lead times for both produced-to-order RTA flat pack products and produced-to-order components that were shorter than the lead times from foreign producers' inventory. Given the customizable nature of some WCVs, these lead times may indicate the time it takes to customize in the United States for these importers.

¹⁸ Respondent ACCI's posthearing brief, pp. 5-8, Respondent China National Forest Products Industry Association's posthearing brief, pp. 5-7 and Petitioner's posthearing brief, pp. 10-12.

¹⁹ This includes data from *** which reported the same lead time of 3.2 days for sales shipped from inventory and those produced-to-order.

components imported from China and shipped from U.S. inventories ranged from 1 to 14 days for all but one importer (which reported 28 days), averaging between 4 and 5 days, while those produced-to-order were reported to be 90 to 120 days.

Knowledge of country sources

Thirty-five purchasers indicated they had marketing/pricing knowledge of domestic product, 33 of WCVs imported from China, 9 for product imported from Vietnam, 4 for product imported from Mexico, 3 each for product imported from Canada, Indonesia, and Malaysia, 2 each for Italy and Taiwan, and 1 each for product imported from India and Turkey.

As shown in table II-6, most purchasers and their customers “sometimes” or “never” make purchasing decisions based on the producer or country of origin. The most common response in all cases was “never.” Of the 10 purchasers that reported that they “always” make decisions based the manufacturer, four firms gave reasons, including relationships, quality, product features, lead times, price, and supply chain costs.

Table II-6
WCVs: Purchasing decisions based on producer and country of origin

Purchaser/customer decision	Always	Usually	Sometimes	Never
Purchaser makes decision based on producer	10	6	7	18
Purchaser’s customers make decision based on producer	1	4	14	19
Purchaser makes decision based on country	7	4	7	23
Purchaser’s customers make decision based on country	---	2	14	21

Note: Purchaser responses from producers across the four listed categories were: 1 Always/0 Usually/1 Sometimes/5 Never (1/0/1/5) for Purchaser makes decision based on producer; 0/0/2/3 for Purchaser’s customers make decision based on producer; 1/0/0/6 for Purchaser makes decision based on country; and 0/0/1/4 for Purchaser’s customers make decision based on country.

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

Factors affecting purchasing decisions

Purchasers were asked to identify the main purchasing factors their firm considered in their purchasing decisions for WCVs (table II-7). The major purchasing factors identified by firms were price (cited by 34 firms), quality (26 firms), lead time (23 firms), and availability (14 firms). Price was the most frequently identified first-most important factor 18 times followed by

quality,²⁰ quality was most frequently identified second-most important factor. Price and lead time were the most frequently identified third-most important factors.

Table II-7

WCVs: Ranking of factors used in purchasing decisions, as reported by purchasers, by factor

Item	1st	2nd	3rd	Total
	Number of firms			
Price / Cost	18	7	9	34
Quality	7	15	4	26
Lead time / Delivery	6	8	9	23
Availability / Supply	4	6	4	14
Product features/range	4	2	3	9
Value	2	0	2	4
Service	0	1	6	7
All other factors	3	2	3	8

Note: Other factors included RTA, domestic, and supplier reputation for first factor, dependability and (contracts, assembled, capacity, and management team) combined for second factor, and standard brand items, credit, and options for third factor.

Note: One purchaser reported four different factors as the most important factor; all these have been included as such in the tabulation.

Note: Six of the 18 purchasers reporting price as the first-most important factors also produced WCVs, with the other reporting quality; 5 reported quality as the second-most important factor, with the others reporting delivery and service; and 2 reported availability/reliability of supply as the third-most important factor, with the others reporting delivery, lead time, price, product features, and service.

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

Purchasers' most common response (17 of 41) on how frequently they purchased based on price was "sometimes."²¹ Of these other purchasers, 14 (including 3 U.S. producers) reported they "usually" purchased lowest-priced product, 7 (including 3 U.S. producers) "always" purchase the lowest-priced product, and 5 never purchased lowest-priced product.

Assembled vs. RTA WCVs

RTA wooden cabinets and vanities are packaged, shipped, and stored in space-saving packaging in order to reduce costs and shipping damage. Purchasers who act as distributors or retailers were asked how often they assemble RTA flat pack cabinets and vanities. Four replied that they "always" do and 5 replied that they "usually" do, however 10 purchasers each indicated that they either "sometimes" or "never" assemble the WCVs before selling them.

²⁰ "Value" was also listed twice as the most important factor, which would be a combination of other factors such as price, quality, and features.

²¹ One of these 17 responding purchasers was also a U.S. producers.

When asked how often they consider purchasing assembled and RTA flat pack wooden cabinets and vanities for the same project, a majority (20 of 36 responding purchasers) replied “never” and most of the remainder replied “sometimes” (10 purchasers). Purchasers replying at least “sometimes” mostly reported issues of availability/lead times or whether an assembled product would be physically able to fit during delivery, in particular for corner, sink base, or tall utility cabinets. One importer noted that imported flat pack cabinets are better for high-rise buildings where they can be hoisted into units unassembled.

Purchasers were also asked whether certain types/sizes/forms of WCVs were available from certain country sources. Twelve of 40 responding purchasers stated that certain types were only available from certain sources. These purchasers most frequently reported that RTA flat pack WCVs are not available from U.S. sources, only China (or other import sources, as noted by a few purchasers), although purchaser *** added that some RTA cabinets are available from U.S. producers.

Importance of specified purchase factors

Purchasers were asked to rate the importance of 21 factors in their purchasing decisions (table II-8). The factors rated as very important that were most frequently by responding purchasers were availability and reliability of supply (40 each), product consistency (39), quality of finish and quality meets industry standards (38 each), and price (37). Lead time – assembled (25), delivery terms and technical support/services (22 each), and packaging (21) were also indicated to be very important by more than half of the responding purchasers.

Table II-8**WCVs: Importance of purchase factors, as reported by U.S. purchasers, by factor**

Factor	Very important	Somewhat important	Not important
Availability	40	---	---
Reliability of supply	40	1	---
Product consistency	39	1	---
Quality of finish	38	4	---
Quality meets industry standards	38	3	---
Price	37	4	---
Lead time - assembled	25	7	7
Technical support/service	22	13	5
Delivery terms	22	15	3
Packaging	21	17	2
Form (assembled or RTA flat pack)	19	8	11
Lead time - RTA flat pack	19	7	12
Quality exceeds industry standards	16	24	2
Discounts offered	15	23	2
Wood type or material	14	24	4
U.S. transportation costs	14	22	4
Product range	13	25	3
Payment terms	12	24	5
Minimum quality requirements	9	18	13
Provision of other products and services	4	20	16
Customization	3	25	12

Note: Factors in which a plurality of U.S. producers that submitted a purchaser's questionnaire differed from the above pluralities included: form (3 of 4 responded "not important", both lead time categories ("somewhat" and "not" important reported by 2 producers for each category), packaging (4 of 6 reporting "somewhat" important), and U.S. transportation costs (4 of 6 reporting "very" important).

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

Supplier certification

Seventeen of 40 responding purchasers require their suppliers to become certified or qualified to sell WCVs to their firm. Purchasers reported that the time to qualify a new supplier ranged from 21 to 270 days. Four purchasers reported that some firms had failed in their attempts to qualify WCVs, or had lost its approved status since 2016, including RiverRun (U.S. producer), Changyi Zhengheng (Chinese producer), AllWood (importer from China), and JSI and KCD (distributors).

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2016 (table II-9). Reasons reported for decreased purchases of U.S. product include demand, started using imported cabinetry, and introduced a new cabinet line that was produced in China. The most frequently reported reason for increased purchases of U.S.

product was increased overall demand.²² Firms that reported increasing purchases from China reported this was caused by demand, lower price, better quality, increased e-retail sales, and need to be competitive with firms importing from China. Reasons firms decreased purchases from China included these AD and CVD investigations, Section 301 tariffs, a September 2019 phase out of Chinese products, quality and logistics, and increased purchases of imports from countries other than China. Sixteen of 41 responding purchasers reported that they had changed suppliers since January 1, 2016. Specifically, firms dropped or reduced purchases from Chinese suppliers J&K (to shift away from Chinese product), Sunco (no longer supplying the U.S. market), “several Chinese” (because of the trade case); one firm (***) reported that Yuanlin and Dalian Dongyi were dropped for price and risk, Masterhome and Hoa Binh were dropped due to price, and Tien Dat, KaiVy, and Phu Tai were added due to price and capacity.

Table II-9
WCVs: Changes in purchase patterns from U.S., subject, and nonsubject countries

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	8	5	13	10	---
China	6	10	16	4	2
All other sources	18	1	8	1	---
Sources unknown	22	1	3	1	---

Note: Purchaser responses from producers across the five listed categories were: 3 Did not purchase/0 Decreased/2 Increased/2 Constant/0 Fluctuated (3/0/2/2/0) for United States; 3/3/0/1/0 for China; 3/0/3/0/0 for All other sources; and 5/0/0/0/0 for Sources unknown.

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

Importance of purchasing domestic product

Thirty-one of 38 purchasers reported that all of their purchases did not require U.S.-produced product. Two purchasers reported that domestic product was required by law (for 1 to 5 percent of their purchases), seven reported it was required by their customers (for 10 to 100 percent of their purchases), and one reported other preferences for domestic product. No reasons were provided for preferring domestic product. In total, six purchasers noted that they had a preference for U.S. WCVs and six noted a preference for those imported from China. One noted that a few of its customers want to avoid products made in China.

²² Only one firm provided a reason other than overall growing demand, the reason was “quality and logistics.”

Sales representative agreements

More than two-thirds (34 of 48) of U.S. producers indicated that they have had contracts with independent sales representatives since January 1, 2016, whereas slightly more than one-third (28 of 81) of importers of WCVs have had them. A minority (six of the responding producers and seven of the responding importers) did not allow representation of product lines from different suppliers at those sales representatives. Respondent ACCI reported that independent or “outside” sales representatives “are ordinarily given sales territories so they know that their efforts to generate sales will not be subject to free-riding by other dealers for that brand” and that “domestic producers do not insist that their representatives refrain from handling imported cabinets. Yet the domestic producers’ sales contracts do restrict representatives from handling cabinets that are actually competitive with the domestic product, which is typically other domestically sourced product.”²³ Petitioners reported that *** do maintain such restrictions but these firms either would or have terminated sales agreements due to carrying imported or RTA WCVs.²⁴

Substitutability among product types

Custom, semi-custom, and stock²⁵ cabinets and vanities

Purchasers were asked how often custom, semi-custom, and stock WCVs can be used interchangeably, i.e., how often they can physically be used in the same applications (table II-10). Eight purchasers reported that no matter what type of cabinet or vanity, they can “always” be used interchangeably. The most frequent response given, however, was that each of the types is “sometimes” interchangeable. Though only one purchaser reported custom vs. semi-custom and semi-custom vs. stock items to be “never” interchangeable, seven reported that custom and stock items are “never” interchangeable. Importer *** reported that “import cabinets (due to inventory investment required) are only sold in 3” width increments, Semi-

²³ Respondent ACCI’s prehearing brief, exh. 1, pp. 25-26.

²⁴ Petitioner’s posthearing brief, exh. 1, pp. 46-48.

²⁵ There is no agreed upon industry-wide definition of stock, semi-custom, and custom cabinets. For example, on its website, U.S. producer MasterBrand defines semi-custom cabinets as those that have some upgraded features like crown molding, roll-out shelves, soft-close hinges, different finishes, stains, paints, and hardware, etc., and that custom cabinets offer the widest variety of wood species, finish types, and features. “Stock, Semi-Custom and Custom Cabinets,” <https://www.masterbrand.com/get-started/design-your-room/cabinet-101/stock-semi-custom-cabinets>, retrieved January 23, 2020.

custom are sold in typically with 1" increments, custom sold in "unlimited" increments, therefore they are not interchangeable in width." Respondents have maintained that there are many segments to the WCV market based not only on stock, semi-custom, and custom WCVs, but also on channel of distribution and level of involvement in WCV construction.²⁶ Petitioners have stated that all WCVs compete with each other, no matter what segment or price point, and that lines between stock, semi-custom, and custom product segments have blurred.²⁷

Table II-10
WCVs: Interchangeability among custom, semi-custom, and stock wooden cabinets and vanities

Comparison group	Always	Frequently	Sometimes	Never
Custom vs. semi-custom	8	11	14	1
Semi-custom vs. stock	8	8	12	1
Custom vs. stock	8	5	11	7

Note: Only two U.S. producers that also submitted purchaser's questionnaires reported that stock and semi-custom are "sometimes" interchangeable. For all other comparisons, U.S. producers reported that the groups were "always" or "frequently" interchangeable – 3 "always" and 4 "frequently" for Custom vs. semi-custom; 4 "always" and 3 "frequently" for Custom vs. semi-custom; 3 "always" and 2 "frequently" and 2 "sometimes" for Custom vs. stock .

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

In addition, purchasers were asked about the availability of different types of cabinets from the United States, China, and nonsubject countries (table II-11). All purchasers reported that custom and semi-custom cabinets and vanities are available from U.S. producers, but five purchasers reported that stock cabinets and vanities are not available from them. In contrast, a majority of purchasers indicated that custom cabinetry is not available from China whereas all purchasers reported that stock cabinets and vanities are available from China. A majority also reported that semi-custom cabinets and vanities are available from China. More than two-thirds of responding importers indicated all types of cabinets and vanities are available from nonsubject sources. Purchaser *** stated that the majority of custom cabinets are for use in single-family homes and the custom segment has been the least affected segment by extended lead times for shipping.

²⁶ Hearing transcript, pp. 204-205 (Marvel) and 250-252 (Graff).

²⁷ Petitioner's posthearing brief, exh. 1, pp. 17-22.

Table II-11

WCVs: Availability of custom, semi-custom, and stock WCVs, by source

Cabinet/vanity type	United States		China		Nonsubject	
	No	Yes	No	Yes	No	Yes
Custom	0	39	19	16	5	12
Semi-custom	0	40	11	26	4	14
Stock	5	35	0	38	4	16

Note: All responding purchasers that were also U.S. producers reported “Yes” for all types from China and nonsubject sources. This includes: 6 producers for China: Custom; 7 for China: Semi-custom; 7 for China: Stock; 5 for Nonsubject: Custom; 6 for Nonsubject: Semi-custom, and 6 for Nonsubject: Stock.

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

Furniture-style and hospitality-style vanities

Purchasers were asked how often furniture-style and hospitality-style vanities were interchangeable with other styles of WCVs. Their responses are presented in table II-12. A plurality of responding purchasers indicated that both styles of vanities were “sometimes” interchangeable with other styles of WCVs. Hospitality-style vanities were rarely mentioned by any firm in response to any question in the USITC questionnaire responses. The lack of domestic availability of furniture-style vanities was cited by multiple importers/purchasers. Importer *** stated that “There is no availability of our type of furniture style vanities in the U.S. - other than smaller custom manufacturing facilities.” Importer *** reported that furniture-style vanities from China and other sources differ dramatically in style and selection. In comparing U.S. to Chinese furniture-style vanities, *** relayed that “We purchase higher quality, furniture-style vanities out of China at a significantly higher cost than what we purchase out of the United States. Vanities out of China typically have a better finish quality, use plywood construction (instead of particle board like most of our US-produced vanities), are standalone furniture items and include other furniture quality features. We are not aware of United States producers that have the capacity or capability to supply similar FSVs to us.” It reported that its U.S. suppliers require a higher minimum order quantity than its suppliers of WCVs imported from China.

Table II-12

WCVs: Interchangeability of furniture-style and hospitality-style for other styles

Source	Always	Usually	Sometimes	Rarely or never
Furniture-style vanities	3	11	16	8
Hospitality-style vanities	3	8	14	9

Note: All three “always” responses for furniture-style vanities and two of three “always” responses for hospitality-style vanities were submitted by U.S. producers who are also purchasers. The remaining U.S. producers that are also purchasers indicated “usually” (2) and “sometimes” (1) for furniture-style vanities and “usually” (3) and “sometimes” (1) for hospitality-style vanities.

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

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a series of questions comparing WCVs produced in the United States, China, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 21 factors for which they were asked to rate the importance in table II-8. Most responding purchasers reported that U.S. WCVs and those imported from China were comparable on 16 factors (table II-13). While most reported that U.S. product was superior for customization, this was reported by the fewest number of purchasers to be very important. Chinese product was reported to be superior for price and RTA flat pack lead time. While not pluralities, far more purchasers indicated that the U.S. product was superior for product range and technical support/service, and far more purchasers indicated that the product imported from China was superior on discounts offered and product form (RTA vs. assembled). Responses were mixed for assembled lead time (for which 14 firms reported U.S. and Chinese product was comparable while 12 firms each reported U.S. product was superior and Chinese product was superior). With respect to nonsubject country product, a plurality of purchasers reported that U.S. and nonsubject WCVs were comparable on 19 factors, and that Chinese and nonsubject product were rated as comparable on 20. The U.S. product was considered superior on assembled product lead time and inferior on price. WCVs from China was considered to be superior on price when compared with that from nonsubject sources, however.

Table II-13
WCVs: Purchasers' comparisons between U.S.-produced and imported product

Factor	U.S. vs. China			U.S. vs. Nonsubject			China vs. Nonsubject		
	S	C	I	S	C	I	S	C	I
Availability	9	24	7	5	12	2	4	12	2
Reliability of supply	9	26	4	3	14	1	4	12	2
Product consistency	6	26	6	4	14	1	5	13	---
Quality of finish	7	25	8	3	11	4	4	13	1
Quality meets industry standards	7	32	1	4	13	1	3	15	---
Price	1	6	33	2	6	11	10	6	2
Lead time - assembled	12	14	12	10	6	2	4	8	4
Technical support/service	17	20	1	7	10	1	3	14	---
Delivery terms	7	26	7	4	11	3	4	11	2
Packaging	8	28	4	4	13	2	3	14	1
Form (assembled or RTA flat pack)	3	18	14	1	10	5	7	10	---
Lead time - RTA flat pack	4	10	19	5	6	3	7	8	2
Quality exceeds industry standards	9	28	2	2	14	2	3	15	---
Discounts offered	3	18	17	3	10	5	6	11	1
Wood type or material	9	26	4	3	13	2	2	16	---
U.S. transportation costs	6	26	6	5	10	3	4	12	2
Product range	17	21	2	6	11	2	3	13	2
Payment terms	5	29	4	4	14	1	4	14	---
Minimum quality requirements	10	24	5	6	10	1	5	9	4
Provision of other products and services	10	21	---	3	14	1	3	14	---
Customization	20	16	3	8	10	1	3	14	1

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.

Note: S=first listed country's product is superior; C=both countries' products are comparable; I=first list country's product is inferior.

Note: Some of the highlighted pluralities change if purchaser responses from producers were analyzed separately. For U.S. vs. China comparisons, the U.S. would be considered superior on lead time - assembled with 12 Superior/10 Comparable/11 Inferior (12/10/11) responses remaining. Removing four "comparable" responses on purchaser questionnaires by U.S. producers regarding Discounts offered along with three U.S. "inferior" responses would make a tied plurality for the U.S. being considered comparable and inferior to China with 3/14/14 responses remaining. For U.S. vs. nonsubject comparisons, removing two "comparable" responses on purchaser questionnaires by U.S. producers regarding lead time - RTA flat pack would make a plurality for the U.S. being considered superior with 5/4/3 responses remaining. In addition, removing three "comparable" responses on purchaser questionnaires by U.S. producers regarding technical support/service would make a tied plurality at 7/7/1 for both U.S. superior and the sources being comparable. With respect to China vs. nonsubject, removing two "comparable" responses on purchaser questionnaires by U.S. producers regarding lead time - RTA flat pack would make a plurality for the China being considered superior with 7/6/2 responses remaining.

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

Comparisons of U.S.-produced and imported WCVs

In order to determine whether U.S.-produced WCVs can generally be used in the same applications as imports from China, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-14, most U.S. producers reported that U.S. and Chinese product can “always” be used interchangeably, while most importers and purchasers reported that U.S. and Chinese product can either “frequently” or “sometimes” be used interchangeably.

Table II-14
WCVs: Interchangeability between WCVs produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. subject countries: U.S. vs. China	***	***	***	***	19	19	31	5	9	17	9	3
Nonsubject countries comparisons: U.S. vs. nonsubject	***	***	***	***	17	20	17	4	5	9	7	1
China vs. nonsubject	***	***	***	***	16	20	15	1	5	9	4	---

Note: A=Always, F=Frequently, S=Sometimes, N=Never.

Note: Purchaser questionnaires responses include four “always” and three “frequently” responses from purchasers that are also U.S. producers for U.S. vs. China and U.S. vs. nonsubject. They also include three “always” and three “frequently” responses from purchasers that are also U.S. producers for China vs. nonsubject.

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

A number of firms explained some factors that limit interchangeability. With respect to WCV components, one U.S. producer reported that cabinet components generally are less interchangeable than the flat or assembled cabinets and vanities. One U.S. producer also indicated that the wider variety of offerings by domestic producers limits interchangeability with Chinese product. Another reported that the type of wood used differ. A fourth U.S. producer reported that very few countries other than China offer products for sale in the United States with any measurable frequency. Producer *** described the components it produces as “totally different from imported components... {T}hey are custom made by style, size and species. The choice {is} far, far, far greater than imported products. In addition, our products are typically stained to match the cabinets- and they are stained (or painted) at the same time as the cabinets.”

Importers and purchasers reported a number of differences as well. The lack of RTA product offered by U.S. producers was noted by at least one importer and purchaser. The RTA

products were reported to be able to be shipped more quickly and take up less space, but may be of limited size and color choices (which allows for quicker delivery), whereas domestically produced WCVs would be more customizable.²⁸ Elements of style and design were also noted to limit interchangeability. Purchaser *** reported that the purchase decision for consumers is generally dictated by style, and there are “distinct style differences in what domestic manufacturers are generally producing versus what global suppliers are bringing to market.” More specifically, as one importer explained, although cabinets function the same, they may “... differ in terms of style and design. For instance, a high-end European-style cabinet made in Germany functions the same as a shaker cabinet made in China, but the style differs and will appeal to an individual customer based on personal taste. And a cabinet from one manufacturer will generally not be able to be paired with a cabinet from a different manufacturer, regardless of country, and result in a cohesive, fluid design.” With respect to vanities, importer *** stated that U.S.-made vanities are mainly cabinet-style, simple vanities, whereas furniture-style vanities from China are “visually dissimilar.” Another importer (***) noted that Chinese vanities are not customizable by the consumer but are not produced in volume in the United States. Other importers and purchasers noted further factors limiting interchangeability, including: cabinet size and wood type (e.g., Russian birch); Chinese producers catering to U.S. specifications while most other countries do not (e.g., imperial vs. metric measurements); greater size range available in Chinese cabinets compared with Italian cabinets and more quickly available than U.S. cabinets (for RTA products warehoused in the United States); and Chinese vanities have longer lead times and higher supply chain costs than U.S. vanities (noted by ***).²⁹

As can be seen from table II-15, most responding purchasers reported that domestically produced and WCVs imported from China “usually” met minimum quality specifications. Determinants of quality included many characteristics of cabinets and vanities: appearance, assembly components (e.g., soft close drawer guides and hinges), color, consistency of grain, ease of assembly, hardware, finish, meeting KCMA or other certification standards, packaging, plywood construction, strength/thickness of box construction, style, and type of wood, among others. Purchasers were also asked if certain features of WCVs had become more standard since January 1, 2016. Of the 41 responding purchasers, all noted that soft-close drawers had

²⁸ One purchaser (***) reported that RTA and assembled WCVs’ interchangeability is limited because “RTA offers benefits like quicker ship times, more readily available stock, and it’s easier to customize or fit in specifically sized areas...”

²⁹ Interchangeability issues listed do not include price-related issues, which were noted by multiple importers and purchasers.

become more standard, 40 reported dovetail drawer construction had, 32 reported plywood construction had, and 23 reported that finished interiors had. In addition, four noted that premium paint/finishes such as glazing had become more standard.

Table II-15
WCVs: Ability to meet minimum quality specifications, by source

Source	Always	Usually	Sometimes	Rarely or never
United States	14	18	1	---
China	14	20	4	---
All other sources	4	3	---	---

Note: Purchasers were asked how often domestically produced or imported WCVs meets minimum quality specifications for their own or their customers' uses.

Note: All other sources include Vietnam (reported by 3 purchasers), Canada, Italy, Malaysia, and Mexico.

Note: Purchaser responses from producers across the four listed categories were: 4 Always/3 Usually/0 Sometimes/0 Never (4/3/0/0) for United States; 3/4/0/0 for China; 1/2/0/0 for All other sources.

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

In addition, producers, importers and purchasers were asked to assess how often differences other than price were significant in sales of WCVs from the United States, subject, or nonsubject countries. As seen in table II-16, most U.S. producers reported that differences other than price were "sometimes" significant when comparing U.S. and Chinese product, U.S. and nonsubject product, and Chinese and nonsubject product. Most importers reported that differences other than price were "always" or "frequently" significant when comparing U.S. and Chinese product, U.S. and nonsubject product, and Chinese and nonsubject product. Purchaser responses were more varied, with almost the same number of purchasers reporting "always" and "frequently" as reporting "sometimes" and "never" differences between U.S. and Chinese WCVs.

Quality and lead times/availability were most frequently noted by responding firms as distinguishing factors other than price. Producer *** described differences in lead times for its production: "Chinese RTA cabinets have traditionally been stocked in inventory for very short lead times (i.e., 1-3 days). Domestic make-to-order cabinets typically require 3-5 weeks. Because of our (Toyota) production system, we can deliver in 1-2 weeks, which is not good enough to compete against the Chinese cabinets unless they are out of stock (their restocking is 1-3 months)." Two purchasers stated that U.S. cabinets use particleboard or pressboard, whereas most Chinese manufacturers use plywood boxes.

Table II-16

WCVs: Significance of differences other than price between WCVs produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. subject countries: U.S. vs. China	***	***	***	***	37	21	17	3	13	6	12	8
Nonsubject countries comparisons: U.S. vs. nonsubject	***	***	***	***	19	17	14	3	6	3	8	6
China vs. nonsubject	***	***	***	***	18	18	13	2	4	---	8	6

Note: A = Always, F = Frequently, S = Sometimes, N = Never.

Note: Purchaser questionnaires responses include four “never,” two “sometimes,” and 1 “always” response from purchasers that are also U.S. producers for U.S. vs. China and U.S. vs. nonsubject. They also include two “never” and two “sometimes” responses from purchasers that are also U.S. producers for China vs. nonsubject.

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

Other factors included in responses to this question included: EPA/environmental regulations which limit what can be produced in the United States; an inability to purchase U.S. components; a lack of inventories held by U.S. producers; a preference by some customers for U.S.-produced cabinets; a preference for RTA if customers want to assemble WCVs themselves; that RTA are easy to handle, transport and less likely to be damaged in transportation; that Vietnam and Malaysia do not have supply or infrastructure to support current demand; and the unavailability of Chinese product from U.S. producers that produce customized product.

Elasticity estimates

This section discusses elasticity estimates; parties were encouraged to comment on these estimates in their prehearing or posthearing briefs. No comments were made.

U.S. supply elasticity

The domestic supply elasticity for WCVs measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of WCVs. 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 WCVs. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 6 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for WCVs measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of WCVs. 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 WCVs in the production of any downstream products. Based on the available information, the aggregate demand for WCVs is likely to be moderately inelastic; a range of -.5 to -1 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.³⁰ 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 WCVs and imported WCVs is likely to be in the range of 3 to 5.

³⁰ 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.

Part III: U.S. producers' production, shipments, and employment

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins is presented in Part I and Appendix D of this report and information on the volume and pricing of imports of the subject merchandise is presented in Part IV and Part V. Information on the other factors specified is presented in this section and/or Part VI and (except as noted) is based on the questionnaire responses of 49 firms that accounted for the substantial majority of U.S. production of WCVs during 2018.¹

U.S. producers

The Commission issued U.S. producers' questionnaires to 138 firms based on information contained in the petitions. Forty-nine firms provided usable data on their productive operations.² Staff believes that these responses represent the substantial majority of U.S. production of WCVs.

Table III-1 lists U.S. producers of WCVs, their production locations, positions on the petitions, and shares of U.S. sales. The largest U.S. producers by share of U.S. sales include ***. Forty-five responding U.S. producers reported production of full-unit WCVs, and 9 reported production of WCV components. Of the nine responding producers of WCV components, ***.

¹ In compiling U.S. shipment data from domestic producers, the Commission received questionnaire responses from all members of the American Kitchen Cabinet Alliance (including the largest companies in the WCV industry), Masco Corporation (a ***), as well as other U.S. producers identified by parties. While respondent ACCI has argued that Commission questionnaires are missing significant shipment data from domestic producers, it did not identify or provide contact information for any additional companies from which the Commission should collect data. Commission staff issued questionnaires to and followed up with 20 companies identified by the Coalition of Vanity Importers. See the Coalition of Vanity Importers' postconference brief at Exhibit 6. Of these firms that provided production and sales estimates, the provided data indicate that these companies comprise *** of total production in 2018. Based on this information, Commission staff believe that the 49 questionnaire responses represent the substantial majority of U.S. production of WCVs in 2018.

² ***.

Table III-1

WCVs: U.S. producers of WCVs, their positions on the petitions, production locations, and shares of U.S. sales, 2018

Firm	Position on petitions	Production location(s)	Share of U.S. sales (percent)	Producer of full-units	Merchant producer of components
ACProducts	Petitioner	Thompsontown, PA Mt Union, PA	***	***	***
Alpine	***	Timnath, CO	***	***	***
American Woodmark	Petitioner	Cumberland, MD Gas City, IN Humboldt, TN Jackson, GA Kingman, AZ Monticello, KY	***	***	***
Avon	Petitioner	Bradenton, FL	***	***	***
Bellmont	Petitioner	Sumner, WA	***	***	***
Benedettini	Petitioner	Rosenberg, TX	***	***	***
Bertch	Petitioner	Waterloo, IA Jesup, IA Oelwein, IA	***	***	***
Bishop	Petitioner	Montgomery, AL	***	***	***
Bridgewood	***	Chanute, KS	***	***	***
Cabinets 2000	Petitioner	Norwalk, CA	***	***	***
Canyon Creek	Petitioner	Monroe, WA	***	***	***
Conestoga	Petitioner	East Earl, PA Kenly, NC Beavertown, PA Beaver Springs, PA Kent, WA	***	***	***
Corsi	Petitioner	Indianapolis, IN Elkins, WV	***	***	***
Crystal Cabinet	Petitioner	Princeton, MN	***	***	***
Dura Supreme	Petitioner	Howard Lake, MN Pierz, MN	***	***	***
Grandview	Petitioner	Parsons, KS Cherryvale, KS	***	***	***
Great Northern	***	Rib Lake, WI	***	***	***
Hardware Resources	***	Bossier City, LA	***	***	***
Hilton	***	Phoenix, AZ	***	***	***
Indiana	Petitioner	Logansport, IN	***	***	***
Kimball	***	Jasper, IN	***	***	***
Kitchen Kompact	Petitioner	Jeffersonville, IN	***	***	***
Koch	Petitioner	Seneca, KS Hiawatha, KS Whitesburg, TN Topeka, KS	***	***	***
Kountry Wood	Petitioner	Nappanee, IN	***	***	***
Lacava	***	Chicago, IL	***	***	***

Table continued on next page.

Table III-1—Continued

WCVs: U.S. producers of WCVs, their positions on the petitions, production locations, and shares of U.S. sales, 2018

Firm	Position on petitions	Production location(s)	Share of U.S. sales (percent)	Producer of full-units	Merchant producer of components
Lanz	Petitioner	Eugene, OR	***	***	***
Leedo	Petitioner	East Bernard, TX El Campo, TX	***	***	***
Legacy	***	Eastaboga, AL	***	***	***
Marsh	Petitioner	High Point, NC	***	***	***
Masco	***	Middlefield, OH Duncanville, TX Culpeper, VA Mt. Sterling, KY Sayre, PA Mt. Jackson, VA	***	***	***
Master WoodCraft	Petitioner	Marshall, TX Jefferson, TX	***	***	***
MasterBrand	Petitioner	Ferdinand, IN Colton, CA Fairdale, KY Carlisle, PA Talladega, AL Kinston, NC Arthur, IL Grants Pass, OR Goshen, IN Jasper, IN Waterloo, IA Lynchburg, VA Newton, KS Liberty, NC Sioux Falls, SD Auburn, AL Cottonwood, MN	***	***	***
Medallion (ACPI Wood Product, LLC, FKA Elkay Cabinetry)	Petitioner	Aurora, CO Waconia, MN Culver, IN Independence, OR Mifflinburg, PA	***	***	***
Mid-America	***	Gentry, AK	***	***	***
Nations	Petitioner	San Antonio, TX	***	***	***
Republic National	Petitioner	Marshall, TX	***	***	***
Showplace Wood	Petitioner	Harrisburg, SD Beresford, SD	***	***	***
Signature	***	Ephrata, PA	***	***	***
Smart	Petitioner	New Paris, IN	***	***	***

Table continued on next page.

Table III-1—Continued

WCVs: U.S. producers of WCVs, their positions on the petitions, production locations, and shares of U.S. sales, 2018

Firm	Position on petitions	Production location(s)	Share of U.S. sales (percent)	Producer of full-units	Merchant producer of components
Southern Finishing	Petitioner	Stoneville, NC Martinsville, VA Kingman, AZ	***	***	***
Spencer	***	Monroe, WA	***	***	***
Tru-Wood	Petitioner	Ashland, AL Lineville, AL	***	***	***
Wellborn	Petitioner	Ashland, AL	***	***	***
Wellborn Forest	Petitioner	Alexander City, AL	***	***	***
Wisembaker	***	Hillsboro, TX	***	***	***
Woodcraft	***	St. Cloud, MN Foreston, MN Greenville, PA Molalla, OR Orwell, OH Wahpeton, ND	***	***	***
Woodland	Petitioner	Sisseton, SD	***	***	***
Woodmont	Petitioner	Dallas, TX Cedar Hill, TX	***	***	***
W.W. Wood	Petitioner	Dudley, MO	***	***	***
Total			100.0	45	9

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent.

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

Table III-2 presents information on U.S. producers’ ownership, related and/or affiliated firms of WCVs. Two U.S. producers are related to foreign producers of WCVs (but not to Chinese producers of the subject merchandise), and four U.S. producers are related to U.S. importers of the subject merchandise. In addition, as discussed in greater detail below, nine U.S. producers reported importing WCVs.

Table III-2
WCVs: U.S. producers' ownership, related and/or affiliated firms, 2018

Item / Firm	Firm Name	Affiliated/Ownership
Ownership:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
Related importers/exporters:		
***	***	***
***	***	***
***	***	***
***	***	***

Table continued on next page.

Table III-2—Continued
WCVs: U.S. producers' ownership, related and/or affiliated firms, 2018

Item / Firm	Firm Name	Affiliated/Ownership
Related producers:		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

Table III-3 presents U.S. producers' reported changes in operations since January 1, 2016. Seven firms reported plant or operation closings; 22 firms reported expansions; 8 firms reported acquisitions, 9 firms reported prolonged shutdowns or curtailments; 3 firms reported revised labor agreements; and 9 firms reported other changes in operations.

Table III-3

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Item / Firm	Reported changed in operations
Office/warehouse/showroom openings:	
***	***
Office/warehouse/showroom closings:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Relocations:	
***	***

Table continued on next page.

Table III-3—Continued

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Item / Firm	Reported changed in operations
Expansions:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table III-3—Continued

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Item / Firm	Reported changed in operations
Expansions (continued):	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Acquisitions:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Consolidations:	
***	***

Table continued on next page.

Table III-3—Continued

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Prolonged shutdowns or curtailments:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Revised labor agreements:	
***	***
***	***
***	***

Table continued on next page.

Table III-3—Continued

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Other:	
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table III-3—Continued

WCVs: U.S. producers' reported changes in operations, since January 1, 2016

Other (continued):	
***	***
***	***
***	***

Note: Based on information provided in the questionnaire, ***.

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

Table III-4 presents public U.S. industry events since January 1, 2016. Six firms reported openings of showrooms, distribution centers, and/or manufacturing sites; 2 firms reported plant closures; and 4 firms announced mergers and/or acquisitions.

Table III-4
WCVs: U.S. industry events since January 1, 2016

Date	Firm	Event Description
May 2017	NewCraft Cabinetry, Kalamazoo, MI	NewCraft Cabinetry opens showroom in Kalamazoo, MI.
May 2017	Republic Elite, Marshall, TX	Republic Elite merges with LDC Stone of Dallas, TX.
June 2017	Elkay Manufacturing, Oakbrook, IL	Elkay Manufacturing closes Ringgold, VA manufacturing plant following decision to discontinue production of the InnerMost Cabinet line, sold exclusively at Home Depot.
December 2017	American Woodmark Corporation, Winchester, VA	American Woodmark Corporation announces acquisition of RSI Home Products.
April 2018	Blackstone Kitchens, United Kingdom	Blackstone Kitchens opens showroom in Greenwich, CT.
June 2018	MasterBrand Cabinets, Jasper, IN	MasterBrand Cabinets closes Auburn, AL manufacturing plant.
June 2018	ACProducts, The Colony, TX	ACProducts acquires Master WoodCraft Cabinetry of Marshall, Texas.
June 2018	Wellborn Cabinetry, Ashland, AL	Wellborn Cabinetry announces sale of Rutt Handcrafted Cabinetry of New Holland, PA, to Birch Holdings, a wholly owned subsidiary of Birch Investment Partners.
December 2018	ACProducts, The Colony, TX	ACProducts acquires Elkay Manufacturing.
March 2019	Kitchen Cabinet Distributors, Raleigh, NC	Kitchen Cabinet Distributors opens showroom and distribution center in Houston, Texas.
May 2019	Wood-Mode Inc., Kreamer, PA	Wood-Mode Inc. closes.
August 2019	Wood-Mode LLC, Kreamer, PA	Wood-Mode Inc. assets purchased by Bill French. Company opens under new name of Wood-Mode LLC.
August 2019	Kane Home Cabinetry and Design, St. Charles, IL	Kane Home Cabinetry and Design opens new showroom in St. Charles, IL.
August 2019	Adornus Cabinetry, Doral, FL	Adornus Cabinetry sets up new manufacturing site in Lancaster County, SC.
November 2019	Masco Corporation, Livonia, MI	Masco Corporation announces agreement to sell Masco Cabinetry to ACProducts.

Sources: *Grand Rapids Business Journal: Cabinet company opens showroom*, <https://www.grbj.com/articles/87995-cabinet-company-opens-showroom>, retrieved January 21, 2020; *The Marshall News Messenger: Republic Elite merges with LDC Stone*, https://www.marshallnewsmessenger.com/news/republic-elite-merges-with-ldc-stone/article_9327fcec-9634-53be-8e48-3059961af8ac.html, retrieved January 21, 2020; *Woodworking Network: Elkay closes Virginia cabinetry plant, killing Home Depot frameless line*, <https://www.woodworkingnetwork.com/news/woodworking-industry-news/elkay-ceases-cabinet-manufacturing-va-plant-discontinues-innermost>, retrieved January 21, 2020; *PR Newswire: American Woodmark Corporation Announces Completion Of RSI Acquisition*, retrieved January 21, 2020; *Greenwich Time: Blackstone Kitchens opens Greenwich showroom in bet on U.S. market*, <https://www.greenwichtime.com/business/article/Blackstone-Kitchens-opens-Greenwich-showroom-in-12799702.php>, retrieved January 21, 2020; *OA Now: MasterBrand Cabinets announces sudden closure of Auburn plant; 445 workers affected*, https://www.oanow.com/news/local/masterbrand-cabinets-announces-sudden-closure-of-auburn-plant-workers-affected/article_ff9c9e4e-6e5f-11e8-b46b-33a385680743.html, retrieved January 21, 2020; *Woodworking Network: Master WoodCraft Cabinetry sold to acpi*, <https://www.woodworkingnetwork.com/news/woodworking-industry-news/master-woodcraft-cabinetry-sold-acpi>, retrieved January 21, 2020; *Wellborn Cabinet sale of Rutt Handcrafted Cabinetry*, <http://s3.amazonaws.com/wellbornmedia/cms/5e1c902031a0a.pdf>, retrieved January 21, 2020; *ACPI Corp.: ACPI announces agreement to acquire Elkay wood products*, <https://www.acpicorp.com/2018/11/16/acpi-announces-agreement-to-acquire-elkay-wood-products-company/>, retrieved January 21, 2020; *Woodworking Network: Kitchen Cabinet Distributors opens 180,000-square-foot Houston center*, <https://www.woodworkingnetwork.com/news/woodworking-industry-news/kitchen-cabinet-distributors-opens-180000-square-foot-houston-center>, retrieved January 21, 2020; *Kitchen & Bath Design News: Wood-Mode Abruptly Closes Doors*, <https://www.kitchenbathdesign.com/wood-mode-abruptly-closes-doors/>, retrieved January 21, 2020; *The Daily Item: Wood-Mode makes 7,000 cabinets since opening, reaches sales goals*, https://www.dailyitem.com/news/wood-mode-makes-cabinets-since-opening-reaches-sales-goals/article_314b513d-db82-5995-859e-924ad536230a.html, retrieved January 21, 2020; *Kane County Chronicle: Kane Home Cabinetry and Design opens showroom in St. Charles*, <https://www.kcchronicle.com/2019/08/13/kane-home-cabinetry-and-design-opens-showroom-in-st-charles/amg24i8/>, retrieved January 21, 2020; *The Herald: 'The perfect location': \$10M plan, 210 new jobs breathe life into Lancaster Co. site.*, <https://www.heraldonline.com/news/local/article234029387.html>, retrieved January 21, 2020; *Kitchen & Bath Design News: Masco Sells KraftMaid, Merillat, Balance of Cabinet Unit*, <https://www.kitchenbathdesign.com/masco-sells-kraftmaid-merillat-balance-of-cabinet-unit/>, retrieved January 21, 2020.

U.S. production, capacity, and capacity utilization

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization for all full-unit producers.³ During 2016-18, as a share of value, full-unit WCVS made up over 93 percent of U.S. producers' U.S. shipments. During 2016-18, production capacity for all U.S. producers of full-units increased by 3.6 percent, with the majority of the increase occurring from 2016 to 2017. Among the 45 responding U.S. producers that manufactured full WCV units, 20 firms reported expansions to increase capacity, and many firms either increased their production capacity or maintained the same level of production capacity during 2016-18.⁴ Capacity was approximately 0.1 percent lower in January-September 2019 ("interim 2019") than in January-September 2018 ("interim 2018").⁵ Production capacity reported by the 12 largest responding U.S. producers increased by *** percent from 2016 to 2018, and was lower in interim 2019 than in interim 2018 by *** percent. The top 12 largest firms accounted for *** percent, *** percent, and *** percent of all responding U.S. producers' production capacity in 2016, 2017, and 2018, respectively.

U.S. producers' production for full-units increased by 0.6 percent from 2016 to 2017, but then decreased by 3.6 percent from 2017 to 2018, ending 3.1 percent lower in 2018 than in 2016. Production was higher in interim 2019 than in interim 2018. Production for the 12 largest responding U.S. producers of full-units decreased by *** percent from 2016 to 2018. These producers accounted for *** percent, *** percent, and *** percent of all responding U.S. producers' production in 2016, 2017, and 2018, respectively.

The Commission requested U.S. producers to identify whether they could, with their existing levels of employment, add additional shifts or work longer hours. *** firms indicated that they could do so, with many firms indicating that if the firm experienced an increase in sales orders, that they would be able to add additional shifts and/or work longer hours.⁶ ***

³ Quantity data for the various components that are subject to these investigations could not be reliably collected using a single unit of measurement. Staff have consequently collected data for components on a value basis. Production, capacity, and quantity-based data were gathered for full-units.

⁴ According to the petitioner, the increase in production capacity reflects investments made by several U.S. producers earlier in the period of investigation that were based on projections of strong U.S. demand for WCVs. Petitioner's postconference brief, answers to staff questions, p. 29; conference transcript pp. 80-81 (Allen); conference transcript p. 82 (Sabine); conference transcript, pp. 83-84 (Miller).

⁵ While capacity reported by *** in interim 2019 than in interim 2018, capacity reported by *** in interim 2019 than in interim 2018. This can largely be attributed to ***. See table III-3.

⁶ U.S. producer questionnaire responses at section II-4a.

firms indicated that they could not add additional shifts or work longer hours with their current employment levels.

Capacity utilization for all U.S. producers of full-unit WCVs decreased from 58.3 percent in 2016, to 56.8 percent in 2017, to 54.5 percent in 2018, ending 3.8 percentage points lower in 2018 than in 2016. Capacity utilization for the top 12 largest full-unit producers was *** than all full-unit producers, at *** percent in 2016, *** percent in 2017, and *** percent in 2018. Of the 45 companies that reported production of full WCV units, *** reported lower capacity utilization in 2018 than in 2016. Some U.S. producers' production increased at a slower rate relative to production capacity, while many other U.S. producers experienced a decrease in production despite production capacity increasing or remaining constant.

Table III-5

WCVs: U.S. producers' full-unit production, capacity, and capacity utilization, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Capacity (units)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 full-unit producers	***	***	***	***	***
All other full-unit producers	***	***	***	***	***
All full-unit producers	59,715,151	61,656,774	61,892,859	46,987,194	46,946,815
	Production (units)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 full-unit producers	***	***	***	***	***
All other full-unit producers	***	***	***	***	***
All full-unit producers	34,802,507	35,012,969	33,738,183	25,811,901	26,060,251

Table continued on next page.

Table III-5—Continued

WCVs: U.S. producers' full-unit production, capacity, and capacity utilization, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Share of production (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 full-unit producers	***	***	***	***	***
All other full-unit producers	***	***	***	***	***
All full-unit producers	100.0	100.0	100.0	100.0	100.0
	Capacity utilization (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 full-unit producers	***	***	***	***	***
All other full-unit producers	***	***	***	***	***
All full-unit producers	58.3	56.8	54.5	54.9	55.5

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

Figure III-1
WCVs: U.S. producers' full-unit production, capacity, and capacity utilization, 2016-18, January to September 2018, and January to September 2019

* * * * *

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

U.S. producers' open market production of components

Nine U.S. producers reported production of WCV components. Data from these producers' open market production of components are presented in table III-6.⁷ Production of all components by value increased during 2016-18, but was lower in interim 2019 than in interim 2018, which can largely be attributed to a decrease in production of ***, as these components comprised the largest shares of total component production by value across all periods.^{8,9}

Table III-6

WCVs: U.S. producers' open market production of components, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (in 1,000 dollars)				
U.S. producers' production.-- Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components	411,033	430,151	425,775	326,306	317,943
	Share of value (percent)				
U.S. producers' production.-- Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components	100.0	100.0	100.0	100.0	100.0

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

⁷ ***, comprised approximately *** percent of total component production during 2016-18.

⁸ ***.

⁹ While there was a decrease in production between 2017 and 2018, total production of components ended higher in 2018 than in 2016.

U.S. producers' U.S. shipments and exports

Table III-7 presents U.S. producers' total shipments of in-scope and out-of-scope products. The value of total shipments of full-units and components increased by 3.9 percent during 2016-18, with much of this increase occurring from 2016 to 2017, and was higher in interim 2019 than in interim 2018. The value of total shipments of domestic products that do not correspond to articles described in the scope experienced the opposite trend, decreasing during 2016-18, and were slightly lower in interim 2019 than in interim 2018. As a share of value, full-units and components corresponding to articles described in the scope made up over *** percent of U.S. producers' total shipments in every year and increased by *** percentage points during 2016-18, remaining steady across interim 2018 and interim 2019.

Table III-7
WCVs: U.S. producers' total shipments, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Total shipments:					
Full-units	***	***	***	***	***
Components	***	***	***	***	***
Both full-units and components	6,964,492	7,173,230	7,235,086	5,506,488	5,513,020
Out-of-scope products	***	***	***	***	***
All products	***	***	***	***	***
	Share of value (percent)				
Total shipments:					
Full-units	***	***	***	***	***
Components	***	***	***	***	***
Both full-units and components	***	***	***	***	***
Out-of-scope products	***	***	***	***	***
All products	***	***	***	***	***

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

Table III-8 presents U.S. producers' U.S. shipments, export shipments, and total shipments of all domestic merchandise corresponding to articles described in the scope. The value of U.S. producers' U.S. shipments of full-units increased by 4.2 percent during 2016-18, and was higher in interim 2019 than in interim 2018. U.S. producers' total in-scope shipments by value similarly increased during 2016-18 by 3.9 percent, and were higher in interim 2019 than in interim 2018. As a share of value, full-units made up over 93 percent of U.S. producers' U.S. shipments during 2016-18. The value of U.S. producers' export shipments of all merchandise corresponding to articles described in the scope experienced the opposite trend, decreasing in 2016-18 by *** percent, and was lower in interim 2019 than in interim 2018. The quantity of U.S. producers' total shipments of full-unit WCVs decreased by *** percent during 2016-18, but were higher in interim 2019 than in interim 2018. Unit values of U.S. producers' U.S. shipments and export shipments increased, by *** percent and *** percent, respectively, during 2016-18, but were lower in interim 2019 than in interim 2018.

Table III-8

WCVs: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. shipments.--					
Full cabinet/vanity unit	6,480,488	6,683,089	6,750,235	5,130,145	5,155,105
Components	446,161	461,449	463,724	359,576	345,635
All in-scope merchandise	6,926,649	7,144,538	7,213,959	5,489,721	5,500,740
Export shipments.--					
Full cabinet/vanity unit	***	***	***	***	***
Components	***	***	***	***	***
All in-scope merchandise	37,843	28,692	21,127	16,767	12,280
Total shipments.--					
Full cabinet/vanity unit	***	***	***	***	***
Components	***	***	***	***	***
All in-scope merchandise	6,964,492	7,173,230	7,235,086	5,506,488	5,513,020
	Quantity (units)				
Full cabinet/vanity units.--					
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	Unit value (dollars per unit)				
Full cabinet/vanity units.--					
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	Share of value (percent)				
U.S. shipments.--					
Full cabinet/vanity unit	93.1	93.2	93.3	93.2	93.5
Components	6.4	6.4	6.4	6.5	6.3
All in-scope merchandise	99.5	99.6	99.7	99.7	99.8
Export shipments.--					
Full cabinet/vanity unit	***	***	***	***	***
Components	***	***	***	***	***
All in-scope merchandise	0.5	0.4	0.3	0.3	0.2
Total shipments.--					
Full cabinet/vanity unit	***	***	***	***	***
Components	***	***	***	***	***
All in-scope merchandise	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
Full cabinet/vanity units.--					
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

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

U.S. producers' full-unit U.S. shipments by type

Table III-9 presents U.S. producers' U.S. shipments of full-units by type. Fully assembled WCVs made up *** of U.S. producers' U.S. shipments during 2016-18. *** reported shipments of RTA flat pack WCVs during 2016-18.

The value of U.S. producers' U.S. shipments of fully assembled WCVs increased by *** percent during 2016-18, and was higher in interim 2019 than in interim 2018. U.S. producers' U.S. shipments of fully assembled WCVs by quantity decreased by *** percent during 2016-18, but was higher in interim 2019 than in interim 2018. The unit value of U.S. producers' U.S. shipments of fully assembled WCVs increased from \$*** per unit in 2016 to \$*** per unit in 2018, but was lower in interim 2019 (at \$*** per unit) than in interim 2018 (at \$*** per unit). As a share of value, fully assembled WCVs made up *** percent of U.S. producers' total U.S. shipments of WCVs, increasing by *** percentage points during 2016-18, remaining the same in interim 2018 and interim 2019. As a share of quantity, fully assembled WCVs consistently made up *** of U.S. producers' U.S. shipments full WCV units during 2016-18, increasing by *** percentage points during 2016-18 and similarly remaining the same in interim 2018 and interim 2019.

The value of U.S. producers' U.S. shipments of RTA flat pack WCVs decreased by *** percent during 2016-18, but was higher in interim 2019 than in interim 2018. U.S. producers' U.S. shipments of RTA flat pack WCVs by quantity decreased by *** percent during 2016-18, but were higher in interim 2019 than in interim 2018. The unit value of U.S. shipments of RTA flat pack WCVs increased from \$*** per unit in 2016, to \$*** per unit in 2018. The unit value of U.S. shipments of fully assembled WCVs was *** during 2016-18 than the unit value of U.S. shipments of RTA flat pack WCVs, by an average of \$*** per unit. As a share of value, RTA flat pack units made up *** of U.S. producers' U.S. shipments all full WCV units during 2016-18, and decreased by *** percentage points during this time. As a share of quantity, U.S. producers' share of RTA flat pack units made up *** percent during 2016-18 and interim 2019, decreasing by *** percentage points during 2016-18.

Table III-9

WCVs: U.S. producers' U.S. shipments of full-units by type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (in 1,000 dollars)				
U.S. producers' U.S. shipments.-- Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/ vanity units	6,480,488	6,683,089	6,750,236	5,130,145	5,155,283
	Quantity (full-units)				
U.S. producers' U.S. shipments.-- Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/ vanity units	***	***	***	***	***
	Unit value (dollars per units)				
U.S. producers' U.S. shipments.-- Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/ vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments.-- Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/ vanity units	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
U.S. producers' U.S. shipments.-- Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/ vanity units	***	***	***	***	***

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

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. The value of U.S. producers' end-of period inventories for both full-units and components decreased during 2016-18, though *** were at their highest in 2017, and were lower in interim 2019 than in interim 2018. U.S. producers' end-of-period inventories of full-units by quantity experienced a similar trend, increasing from 2016 to 2017, but then decreasing from 2017 to 2018 to end lower in 2018 than in 2016. U.S. producers' end-of-period inventories were lower, by both quantity and value, in interim 2019 than in interim 2018.

Table III-10
WCVs: U.S. producers' inventories, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (in 1,000 dollars)				
U.S. producers' end-of-period inventories.-- Full-units	***	***	***	***	***
Components	***	***	***	***	***
Both full-units and components	117,623	126,954	112,725	123,527	114,409
	Ratio (percent)				
Ratio of inventories to U.S. shipments.-- Full-units	***	***	***	***	***
Components	***	***	***	***	***
Both full-units and components	***	***	***	***	***
Ratio of inventories to total shipments.-- Full-units	***	***	***	***	***
Components	***	***	***	***	***
Both full-units and components	***	***	***	***	***
	Quantity (full-units)				
U.S. producers' end-of-period inventories.	554,943	575,636	541,203	624,224	569,666
	Ratio (percent)				
Ratio of inventories to production.	***	***	***	***	***
Ratio of inventories to U.S. shipments.	***	***	***	***	***
Ratio of inventories to total shipments.	***	***	***	***	***

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

U.S. producers' imports

U.S. producers' imports of WCVs are presented in table III-11. Of the nine firms that reported imports of WCVs, *** firms reported imports of WCVs from China, and *** firms reported imports from nonsubject sources, primarily from ***. Most firms stated that they ***, ***, as a ratio of imports to total shipments by value, firms' imports generally *** of their total shipments during 2016-18. Imports reported by *** firms, ***, increased during 2016-18, while imports reported by *** firms, ***, decreased during 2016-18. ***. With the exception of ***, the value of most firms' reported imports was higher in interim 2019 than in interim 2018.

Table III-11

WCVs: U.S. producers' imports, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (in 1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- Nonsubject sources ***	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- Nonsubject sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				
	Value (in 1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources ***	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				
	Value (in 1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources ***	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				

Table continued on next page.

Table III-11—Continued

WCVs: U.S. producers' imports, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources ***	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				

Table continued on next page.

Table III-11—Continued
WCVs: U.S. producers' imports, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January-September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources ***	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				

Table continued on next page.

Table III-11—Continued

WCVs: U.S. producers' imports, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All imports sources	***	***	***	***	***
	Narrative				
*** reason for importing	***				
	Value (1,000 dollars)				
*** total shipments	***	***	***	***	***
*** U.S. imports from.-- Nonsubject sources ***	***	***	***	***	***
	Ratio (percent)				
*** ratio to total shipments of imports from.-- Nonsubject sources	***	***	***	***	***
*** reason for importing	***				

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

U.S. employment, wages, and productivity

Table III-12 shows U.S. producers' employment-related data. Production and related workers ("PRWs") increased by 4.5 percent during 2016-18, but were lower in interim 2019 than in interim 2018. Total hours worked increased by 3.0 percent during 2016-18, but were lower in interim 2019 than in in interim 2018. Wages paid, hourly wages, productivity, and labor costs increased during 2016-18. Hourly wages increased from \$15.83 in 2016, to \$17.20 in 2018. As a share of the value of total shipments, labor costs increased by 1.3 percentage points during 2016-18.

Table III-12

WCVs: Average number of production and related workers, hours worked, wages paid to such employees, hourly wages, productivity, and unit labor costs, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
Production and related workers (PRWs) (number)	33,929	35,146	35,459	35,615	34,893
Total hours worked (1,000 hours)	77,335	79,209	79,652	60,982	59,752
Hours worked per PRW (hours)	2,279	2,254	2,246	1,712	1,712
Wages paid (1,000 dollars)	1,224,109	1,281,955	1,369,862	1,072,671	1,070,211
Hourly wages (dollars per hour)	\$15.83	\$16.18	\$17.20	\$17.59	\$17.91
Productivity (total shipments value per hour)	\$90.06	\$90.56	\$90.83	\$90.30	\$92.27
Labor costs (share of total shipments value)	17.6	17.9	18.9	19.5	19.4

Note: ***. Staff telephone interview with ***, February 26, 2020.

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

Part IV: U.S. imports, apparent U.S. consumption, and market shares

U.S. importers

The Commission issued U.S. importers' questionnaires to 150 firms believed to be importers of full-unit WCVs and components, as well as to all U.S. producers of full-unit WCVs and components.¹ Usable questionnaire responses were received from 84 companies, representing a majority of U.S. imports from China, by value, in 2018 under HTS subheading 9403.40.9060.² ³ Table IV-1 lists all responding U.S. importers of the subject merchandise from China and other sources, their locations, and their shares of U.S. imports, in 2018.

¹ The Commission issued questionnaires to those firms identified in the petitions, along with firms that, based on a review of ***, may have accounted for more than 0.5 percent of total imports under HTS statistical reporting number 9403.40.9060 in 2018.

² *** submitted responses to the Commission's U.S. importers' questionnaire during the preliminary phase of these investigations but did not submit a response during the final phase. Furthermore, several members of the American Coalition of Cabinet Importers ("ACCI"), a respondent party, did not provide responses. These members include: **. The Commission received three U.S. importers' questionnaire responses which were omitted due to data concerns.

³ Based upon the scope set forth by Commerce, the merchandise subject to these investigations are imported under statistical reporting numbers 9403.40.9060, 9403.60.8081, and 9403.90.7080 of Harmonized Tariff Schedule of the United States ("HTSUS"). However, the vast majority of WCVs are believed to enter the United States under HTS statistical reporting number 9403.40.9060. Petitioner's postconference brief, p. 20 and p. 25.

Table IV-1
WCVs: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports value by source (percent)			Importer of full units	Importer of components
		China	Nonsubject sources	All import sources		
6 Square	Edina, MN	***	***	***	***	***
ACP	The Colony, TX	***	***	***	***	***
Adornus	Doral, FL	***	***	***	***	***
Aline	Mokena, IL	***	***	***	***	***
All Wood	Bartow, FL	***	***	***	***	***
Amberleaf	Chicago, IL	***	***	***	***	***
American Woodmark	Winchester, VA	***	***	***	***	***
Anaheim Kitchen	Anaheim, CA	***	***	***	***	***
APRO	Casselberry, FL	***	***	***	***	***
Asia Cabinetry	Houston, TX	***	***	***	***	***
Blossom	Maspeth, NY	***	***	***	***	***
Brokering	Glasgow, KY	***	***	***	***	***
Builder Supply	Madison, TN	***	***	***	***	***
Cabinet and Stone	Tampa, FL	***	***	***	***	***
Cabinets & Granite	Carol Stream, IL	***	***	***	***	***
Cabinets Direct	Beltville, MD	***	***	***	***	***
Cabinets To Go	Lawrenceburg, TN	***	***	***	***	***
Casa	Rancho Cucamonga, CA	***	***	***	***	***
China Stone	South El Monte, CA	***	***	***	***	***
Choice	Bedford Heights, OH	***	***	***	***	***
Clark and Son	East Sparta, OH	***	***	***	***	***
Classic	Mount Crawford, VA	***	***	***	***	***
CNC	South Plainfield, NJ	***	***	***	***	***
Craftmark	Rancho Cucamonga, CA	***	***	***	***	***
Design and Stone	Phoenix, AZ	***	***	***	***	***
DL Space	New Orleans, LA	***	***	***	***	***
East Front	Norfolk, VA	***	***	***	***	***
East Star	San Francisco, CA	***	***	***	***	***
Eucucina	Doral, FL	***	***	***	***	***
Fabuwood	Newark, NJ	***	***	***	***	***

Table continued on next page.

Table IV-1—Continued

WCVs: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports value by source (percent)			Importer of full units	Importer of components
		China	Nonsubject sources	All import sources		
Foremost	East Hanover, NJ	***	***	***	***	***
FX Cabinets	City of Industry, CA	***	***	***	***	***
GoldenHome	City of Industry, CA	***	***	***	***	***
Grand JK	Kent, WA	***	***	***	***	***
Grand JK&C	City of Industry, CA	***	***	***	***	***
Green Forest	Chesapeake, VA	***	***	***	***	***
Greencastle	South El Monte, CA	***	***	***	***	***
GreenStar	New York, NY	***	***	***	***	***
Hardware RTA	Dallas, TX	***	***	***	***	***
Hardware Vanity	Dallas, TX	***	***	***	***	***
HDI	Pinellas Park, FL	***	***	***	***	***
Highland	Phoenix, AZ	***	***	***	***	***
Hilton Cabinets	Phoenix, AZ	***	***	***	***	***
Home Décor	Cleveland, OH	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***
Home Meridian	High Point, NC	***	***	***	***	***
Hornings	Hegins, PA	***	***	***	***	***
Innovation	Tampa, FL	***	***	***	***	***
J&K 10	Denver, CO	***	***	***	***	***
J&K 2	Norcross, GA	***	***	***	***	***
JSI	Fall River, MA	***	***	***	***	***
Kaixin	Eastvale, CA	***	***	***	***	***
Kimball	Jasper, IN	***	***	***	***	***
Kitchen Cabinet Designers	Raleigh, NC	***	***	***	***	***
KZ Kitchen	San Jose, CA	***	***	***	***	***
LA Bath	Commerce, CA	***	***	***	***	***
Madeli	Miami, FL	***	***	***	***	***
Major Kitchen	Brooklyn, NY	***	***	***	***	***
Masco	Ann Arbor, MI	***	***	***	***	***
MasterBrand	Jasper, IN	***	***	***	***	***

Table continued on next page.

Table IV-1—Continued

WCVs: U.S. importers, their headquarters, and share of total imports by source, 2018

Firm	Headquarters	Share of imports value by source (percent)			Importer of full units	Importer of components
		China	Nonsubject sources	All import sources		
Milzen	Oakland, CA	***	***	***	***	***
Multi Family	Matthews, NC	***	***	***	***	***
NKB	Concord, NC	***	***	***	***	***
Northtimber	Foxboro, MA	***	***	***	***	***
PCTC	Anaheim, CA	***	***	***	***	***
PF Sales	Philadelphia, PA	***	***	***	***	***
Pius	Seattle, WA	***	***	***	***	***
Ronbow	Livermore, CA	***	***	***	***	***
Sandi	Chino, CA	***	***	***	***	***
Shekia	Edison, NJ	***	***	***	***	***
Simpli Home	Tumwater, WA	***	***	***	***	***
Skyline	Farmers Branch, TX	***	***	***	***	***
Sollid	Tempe, AZ	***	***	***	***	***
Star Cabinetry	Copiague, NY	***	***	***	***	***
Stone Denver	Denver, CO	***	***	***	***	***
Su Development	Bellevue, WA	***	***	***	***	***
Sunco	South Easton, MA	***	***	***	***	***
Unicraft	City Of Industry, CA	***	***	***	***	***
United Lily Ann	Adrian, MI	***	***	***	***	***
Vanity By Design	Irvine, CA	***	***	***	***	***
Wayfair	Boston, MA	***	***	***	***	***
Web-Don	Charlotte, NC	***	***	***	***	***
Woodcraft	St. Cloud, MN	***	***	***	***	***
W.W. Wood	Dudley, MO	***	***	***	***	***
Total		***	***	***	75	23

Note: Shares and ratios shown as “0.0” represent values greater than zero, but less than “0.05” percent.

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

U.S. imports

Table IV-2 and figure IV-1 present data for U.S. imports of full-unit WCVs and components from China and all other sources.⁴ Imports from China, by value and quantity, accounted for the majority of imports of full-unit WCVs and components from all sources during 2016-18 and in interim 2019 (over *** percent of imports of full-units and components by value and over *** percent imports of full-units by quantity). The value of U.S. imports of full-unit WCVs from China increased by 57.2 percent from 2016 to 2018 and was 9.2 percent lower in interim 2019 than in interim 2018. U.S. imports of components from China, by value, exhibited a similar upward trend as imports of full-unit WCVs from China, increasing by 28.4 percent from 2016 to 2018. It was 27.0 percent lower in interim 2019 than in interim 2018. Collectively, the value of imports of full-unit WCVs and components from China increased by 53.8 percent from 2016 to 2018 and was 11.1 percent lower in interim 2019 than in interim 2018. Imports of full-unit WCVs from China, by quantity, increased by 46.3 percent from 2016 to 2018 and was 4.8 percent lower in interim 2019 than in interim 2018.⁵

The value of U.S. imports of full-unit WCVs from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. U.S. imports of components from nonsubject sources, by value, increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. The collective value of U.S. imports of full-unit WCVs and components from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. The quantity of imports of full-unit WCVs from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018.

⁴ Full-units WCVs accounted for the vast majority of all imports from China by value during 2016-18 (*** percent in 2016, *** percent in 2017, and *** percent in 2018).

⁵ The official import statistics do not provide quantity data for imports classified under HTS statistical reporting numbers 9403.40.9060, 9403.60.8081, and 9403.90.7080. Additionally, quantity data for the various components that are subject to these investigations cannot be reliably collected with a single unit of measurement. Consequently, the Commission collected only value data for U.S. importers' imports and U.S. shipments of components, making value the closest data that is co-extensive with the scope of these investigations. Due to these factors, value is the primary metric used to analyze trends in the imports of all in-scope merchandise and U.S. shipments of such imports. Quantity data for full-unit WCVs are included as reported in the questionnaire responses.

Table IV-2
WCVs: U.S. imports by source, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value of full units (1,000 dollars)				
U.S. imports from.— China	909,487	1,125,002	1,429,836	974,597	884,531
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Value of components (1,000 dollars)				
U.S. imports from.— China	122,251	128,441	156,975	113,600	82,907
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Value of full units and components (1,000 dollars)				
U.S. imports from.— China	1,031,738	1,253,443	1,586,811	1,088,197	967,438
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Quantity (units)				
U.S. imports from.— China	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. imports from.— China	62	65	66	63	60
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Share of value (percent)				
U.S. imports from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Share of quantity (percent)				
U.S. imports from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	Ratio of import values to U.S. producer's total shipments value				
U.S. imports from.— China	14.8	17.4	21.9	20.1	17.8
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note: Data for full units were derived from official U.S. import statistics while data for components were compiled from data submitted in response to Commission questionnaires. Unit values are calculated using full units only (i.e. excluding the value of components).

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Figure IV-1

WCVs: U.S. imports by source, 2016-18, January to September 2018, and January to September 2019

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Although the average unit value of U.S. imports of full-unit WCVs from China increased from \$62 per unit in 2016 to \$66 per unit in 2018, it was lower than the average unit value of U.S. imports of full-unit WCVs from nonsubject sources in each year during 2016-18. The average unit value of U.S. imports of full-unit WCVs from China was \$60 per unit in interim 2019, compared with \$63 per unit in interim 2018. The average unit value of U.S. imports of full-unit WCVs from nonsubject sources decreased from \$*** per unit in 2016 to \$*** per unit in 2018 and was \$*** per unit in interim 2019, compared with \$*** per unit in interim 2018.

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁶ Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the

⁶ Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Tariff Act of 1930 (“Act”) (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.⁷ By value, imports from China accounted for *** percent of total imports of WCVs during the most recent 12-month period (March 2018-February 2019). Table IV-3 presents the share of total U.S. imports, by value, attributable to China during the most recent 12-month period.

Table IV-3
WCVs: U.S. importers in the twelve-month period preceding the filing of the petitions, March 2018 through February 2019

Item	March 2018 through February 2019	
	Value (1,000 dollars)	Share value (percent)
U.S. imports from.— China	1,586,506	***
Nonsubject sources	***	***
All import sources	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

U.S. imports of components by type

Table IV-4 presents data on U.S. importers’ U.S. imports of components by type. Components other than boxes, doors, drawers, frames, and back and end panels accounted for the largest share of total U.S. imports of components from China in 2017, 2018, and interim 2019 while doors accounted for the largest share in 2016. Doors accounted for the second-largest share of imports of components from China in 2017, 2018, and interim 2019. Drawers accounted for the third-largest share of all U.S. imports of components from China in each year during 2016-18 and in interim 2019. The values of U.S. imports of all components from China, except for doors, were higher in 2018 than in 2016. The values of U.S. imports of frames, boxes, doors, drawers, and back and end panels from China were lower in interim 2019 than in interim 2018 while the value of U.S. imports of other components from China was higher.

⁷ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-4

WCVs: U.S. importers' U.S. imports of components by component type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. imports from China.—					
Component: Frames	8,025	13,343	19,394	14,102	8,347
Component: Boxes	***	***	***	***	***
Component: Doors	45,220	39,579	41,173	29,550	22,094
Component: Drawers	18,857	21,885	20,514	15,566	12,621
Component: Back and end panels	***	***	***	***	***
Component: Other	42,774	45,661	48,821	34,385	34,653
All components: China	122,251	128,441	156,975	113,600	82,907
	Share of value (percent)				
U.S. imports from China.—					
Component: Frames	6.6	10.4	12.4	12.4	10.1
Component: Boxes	***	***	***	***	***
Component: Doors	37.0	30.8	26.2	26.0	26.6
Component: Drawers	15.4	17.0	13.1	13.7	15.2
Component: Back and end panels	***	***	***	***	***
Component: Other	35.0	35.6	31.1	30.3	41.8
All components: China	100.0	100.0	100.0	100.0	100.0
	Value (1,000 dollars)				
U.S. imports from nonsubject sources.—					
Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components: Nonsubject sources	***	***	***	***	***
	Share of value (percent)				
U.S. imports from nonsubject sources.—					
Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components: Nonsubject sources	***	***	***	***	***

Table continued on next page.

Table IV-4—Continued

WCVs: U.S. importers' U.S. imports of components by component type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. imports from all import sources.— Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components: All import sources	***	***	***	***	***
	Share of value (percent)				
U.S. imports from all import sources.— Component: Frames	***	***	***	***	***
Component: Boxes	***	***	***	***	***
Component: Doors	***	***	***	***	***
Component: Drawers	***	***	***	***	***
Component: Back and end panels	***	***	***	***	***
Component: Other	***	***	***	***	***
All components: All import sources	***	***	***	***	***

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

Doors accounted for the largest share of U.S. imports of components from nonsubject sources in each year during 2016-18 and in interim 2019. Components other than boxes, doors, drawers, frames, and back and end panels accounted for the second-largest share of U.S. imports of components from nonsubject sources in each year during 2016-18 and in interim 2019. Drawers accounted for the third-largest share of U.S. imports of components from nonsubject sources in each year during 2016-18 while frames accounted for the third-largest share in interim 2019. The values of U.S. imports of frames, doors, drawers, and other components from nonsubject sources were higher in 2018 than in 2016 while the values of boxes and back and end panels were lower. The values of U.S. imports of frames, boxes, doors, drawers, and other components from nonsubject sources were higher in interim 2019 than in interim 2018. No firms imported back and end panels from nonsubject sources in either interim period.

U.S. shipments by assembly type

Table IV-5 presents data on U.S. importers' U.S. shipments of full-unit WCVs by assembly type (fully assembled and RTA flat pack). U.S. shipments of WCVs from China, by value, were almost evenly distributed among each assembly type during 2016-18 and in interim 2019. However, by quantity, RTA flat packs accounted for the majority of U.S. shipments of WCVs from China during 2016-18 and in interim 2019 (68.6 percent in 2016, 69.9 percent in 2017, 69.8 percent in 2018, and 67.2 percent in interim 2019).⁸

Exhibiting similar upward trends, the values of U.S. importers' U.S. shipments of fully assembled and RTA flat pack WCVs from China increased by 45.4 percent and 43.8 percent, respectively, from 2016 to 2018. The value of U.S. shipments of fully assembled WCVs from China was 9.8 percent higher in interim 2019 than in interim 2018 while the value of U.S. shipments of RTA flat pack WCVs from China was 0.8 percent higher. The value of U.S. importers' U.S. shipments of all full-unit WCVs from China increased by 44.6 percent from 2016 to 2018 and was 5.1 percent higher in interim 2019 than in interim 2018.

⁸ Representatives from JSI Cabinetry and the ACCI noted that almost all imported cabinets are shipped to the United States from China in the form of RTA flat packs, with all parts and components required to assemble a cabinet. Conference transcript pp. 125-126 (Graff) and hearing transcript, p. 230 (Nicely).

Table IV-5

WCVs: U.S. importers' U.S. shipments by assembly type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: China.— Fully assembled	372,119	452,109	540,891	370,859	407,154
RTA flat pack	371,054	434,779	533,505	406,138	409,207
Total full cabinet/vanity units	743,173	886,888	1,074,396	776,997	816,361
	Quantity (units)				
U.S. importers' U.S. shipments: China.— Fully assembled	2,048,138	2,468,407	2,969,324	2,141,556	2,320,596
RTA flat pack	4,481,614	5,738,547	6,851,018	5,064,831	4,759,429
Total full cabinet/vanity units	6,529,752	8,206,954	9,820,342	7,206,387	7,080,025
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: China.— Fully assembled	182	183	182	173	175
RTA flat pack	83	76	78	80	86
Total full cabinet/vanity units	114	108	109	108	115
	Share of value (percent)				
U.S. importers' U.S. shipments: China.— Fully assembled	50.1	51.0	50.3	47.7	49.9
RTA flat pack	49.9	49.0	49.7	52.3	50.1
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
U.S. importers' U.S. shipments: China.— Fully assembled	31.4	30.1	30.2	29.7	32.8
RTA flat pack	68.6	69.9	69.8	70.3	67.2
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-5—Continued

WCVs: U.S. importers' U.S. shipments by assembly type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: Nonsubject sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: Nonsubject sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: Nonsubject sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

Table continued on next page.

Table IV-5—Continued

WCVs: U.S. importers' U.S. shipments by assembly type, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: All import sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: All import sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: All import sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: All import sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: All import sources.— Fully assembled	***	***	***	***	***
RTA flat pack	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

The quantity of responding U.S. importers' U.S. shipments of RTA flat pack WCVs increased by 52.9 percent from 2016 to 2018.⁹ Fifty-nine firms reported U.S. shipments of RTA flat pack WCVs from China in at least one year during 2016-18.¹⁰ Forty-nine firms reported U.S. shipments of RTA flat pack WCVs from China in each year during 2016-18; four firms began reporting shipments of RTA flat pack WCVs in 2017; and five firms began reporting U.S. shipments of RTA flat pack WCVs from China in 2018.¹¹ Additionally, one firm, ***, reported U.S. shipments of RTA flat pack WCVs from China only in 2017. Among the 49 firms that reported U.S. shipments of RTA flat pack WCVs from China in each year during 2016-18, 40 reported more shipments in 2018 than in 2016. However, U.S. importers' U.S. shipments of RTA flat pack WCVs from China, by quantity, were 6.0 percent lower in interim 2019 than in interim 2018. Fifty-six firms reported U.S. shipments of RTA flat pack WCVs from China in both interim periods with 37 firms reporting fewer shipments in interim 2019 than in interim 2018.

⁹ *** accounted for *** of the total increase in the quantity of U.S. shipments of RTA flat pack WCVs from China during 2016-18. *** accounted for the *** share of such shipments in each year during 2016-18.

¹⁰ Thirty-five of those 59 firms only shipped RTA flat pack WCVs during 2016-18. A representative from Cabinets To Go, ***, testified that its entire business model was built around the RTA flat pack WCVs. A representative from CNC Cabinetry testified that CNC Cabinetry sold WCVs in flat pack form to its dealers because larger cabinets, such as lazy Susans, cannot be transported in assembled form through narrow freight elevators, hallways, and doorways. Hearing transcript, p. 238 and Respondent ACCI's posthearing brief, appendix A, p. 3.

¹¹ The four firms that began reporting U.S. shipments of RTA flat pack WCVs from China in 2017 collectively shipped *** units in 2017, equivalent to *** percent of the total increase in the quantity of U.S. shipments of RTA flat pack WCVs from China during 2016-17. The five firms that began reporting U.S. shipments of RTA flat pack WCVs from China in 2018 collectively shipped *** units in 2018, equivalent to *** percent of the total increase in the quantity of U.S. shipments of RTA flat pack WCVs from China during 2017-18.

The quantity of responding U.S. importers' U.S. shipments of fully assembled WCVs from China increased by 45.0 percent from 2016 to 2018.¹² Thirty-nine firms reported U.S. shipments of fully assembled WCVs from China in at least one year during 2016-18.¹³ Thirty-five firms reported U.S. shipments of fully assembled WCVs from China in each year during 2016-18; one firm, ***, began reporting U.S. shipments of fully assembled WCVs from China only in 2017; and three firms began reporting U.S. shipments of fully assembled WCVs from China in 2018.¹⁴ Among the 35 firms that reported U.S. shipments of fully assembled WCVs from China in each year during 2016-18, 29 reported more shipments in 2018 than in 2016. The quantity of U.S. importers' U.S. shipments of fully assembled WCVs from China was 8.4 percent higher in interim 2019 than in interim 2018. Thirty-six firms reported U.S. shipments of fully assembled WCVs from China in both interim periods, with 17 firms reporting more shipments in interim 2019 than in interim 2018. Overall, the quantity of U.S. shipments of WCVs from China increased by 50.4 percent from 2016 to 2018 and was 1.8 percent lower in interim 2019 than in interim 2018.

¹² *** accounted for *** of the total increase in the quantity of U.S. shipments of fully assembled WCVs from China between 2016 and 2017. *** accounted for the *** shares of U.S. shipments of fully assembled WCVs from China in each year during 2016-18.

¹³ Counsel for ACCI testified that some importers such as JSI have large facilities that assemble RTA flat packs from inventory, which can be shipped within the next day. A representative from Kitchen Cabinet Distributors testified that Kitchen Cabinet Distributors assembles some of its cabinets prior to shipment. Respondent ACCI also noted that RTA flat pack cabinets may be assembled by a dealer or distributor before reaching the location where they will ultimately be installed. Hearing transcript pp. 231 and 259 (Nicely) (Goldstein) and Respondent ACCI's posthearing brief, appendix A, p. 86.

¹⁴ *** shipped *** fully assembled WCVs from China in 2017, which is *** percent of the total increase in the quantity of U.S. shipments of fully assembled WCVs from China during 2016-17. The three firms that began reporting U.S. shipments of fully assembled WCVs from China in 2018 shipped *** units, equivalent to *** percent of the total increase in the quantity of U.S. shipments of fully assembled WCVs from China during 2017-18.

The unit value of U.S. shipments of fully assembled WCVs from China was mostly constant during 2016-18 (between \$182 per unit and \$183 per unit).¹⁵ It was \$175 per unit in interim 2019, compared with \$173 per unit in interim 2018. The unit value of U.S. shipments of RTA flat pack WCVs from China was less than half the unit value of U.S. shipments of fully assembled WCVs from China in each year during 2016-18 and in interim 2019. It decreased from \$83 per unit in 2016 to \$78 per unit in 2018 and was \$86 per unit in interim 2019, compared with \$80 per unit in interim 2018.

By value and quantity, fully assembled WCVs accounted for *** U.S. shipments of WCVs from nonsubject sources. The value of U.S. shipments of fully assembled WCVs from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. The quantity of U.S. shipments of fully assembled WCVs from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. *** accounted for *** U.S. shipments of fully assembled WCVs from nonsubject sources in each year during 2016-18 and in interim 2019. The unit value of U.S. shipments of fully assembled WCVs from nonsubject sources decreased from \$*** per unit in 2016 to \$*** per unit in 2018 and was \$*** per unit in interim 2019, compared with \$*** in interim 2018.

¹⁵ The unit value of U.S. shipments of fully assembled WCVs from China reported in the final phase of these investigations is approximately 20 percent higher than the reported unit value of such shipments in the preliminary phase of these investigations. The difference in the reported unit value between the two phases is largely attributed to ***, which accounted for the largest share of responding importers' U.S. shipments of fully assembled WCVs from China in the preliminary phase and the second-largest share in the final phase. In its response to the U.S. importers' questionnaire for the final phase of these investigations, ***. Email from ***, January 15, 2020.

Apparent U.S. consumption and market shares

Table IV-6 and figure IV-2 present data on apparent U.S. consumption and U.S. market shares for full-unit WCVs and components based on value. Apparent U.S. consumption of full-unit WCVs and components increased by *** percent from 2016 to 2018 and was *** percent lower in interim 2019 than in interim 2018. U.S. producers' market share, by value, decreased from *** percent in 2016 to *** percent in 2018 and was *** percent in interim 2019, compared with *** percent in interim 2018. Conversely, the market share of imports from China, by value, increased from *** percent in 2016 to *** percent in 2018. It was *** percent in interim 2019, compared with *** percent in interim 2018. The market share of imports from nonsubject sources, by value, increased from *** percent in 2016 to *** percent in 2018 and was *** percent in interim 2019, compared with *** percent in interim 2018.

Table IV-6

WCVs: Apparent U.S. consumption and market shares of all in-scope merchandise by value, 2016-18, January to September 2018, January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	6,926,649	7,144,538	7,213,959	5,489,721	5,500,740
U.S. imports from.— China	1,031,738	1,253,443	1,586,811	1,088,197	967,438
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note: Value data is the closest data that is co-extensive with the scope of these investigations which covers full-unit WCVs and components.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Figure IV-2

WCVs: Apparent U.S. consumption of all in-scope merchandise by value, 2016-18, January to September 2018, January to September 2019

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Table IV-7 presents data on apparent U.S. consumption and U.S. market shares for full-unit WCVs based on quantity. Apparent U.S. consumption of full-unit WCVs increased by *** percent from 2016 to 2018 and was *** in interim 2019 and interim 2018. The increase in the quantity of apparent U.S. consumption from 2016 to 2018 was a reflection of the increase in the quantity of U.S. imports from China and nonsubject sources.

U.S. producers' market share for full-unit WCVs, by quantity, decreased from *** percent in 2016 to *** percent in 2018 and was *** percent in interim 2019, compared with *** percent in interim 2018. Conversely, the market share of imports from China, by quantity, increased from *** percent in 2016 to *** percent in 2018. It was *** percent in interim 2019, compared with *** percent in interim 2018. The market share of imports from nonsubject sources, by quantity, increased from *** percent in 2016 to *** percent in 2018 and was *** percent in interim 2019, compared with *** percent in interim 2018.

Table IV-7

WCVs: Apparent U.S. consumption and market shares of full-unit WCVs by quantity, 2016-18, January to September 2018, January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Quantity (units)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.— China	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Apparent U.S. consumption and market shares for fully assembled WCVs

Table IV-8 presents data on apparent U.S. consumption and market share for fully assembled WCVs based on value. Apparent U.S. consumption of fully assembled WCVs increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. The value of U.S. producers' U.S. shipments and U.S. importers' U.S. shipments from China each increased from 2016 to 2018, but the increase in U.S. importers' U.S. shipments from China was greater on a percentage basis.

U.S. producers' market share for fully assembled WCVs, based on value, decreased from *** percent in 2016 to *** percent in 2018 while the market share for imports from China increased from *** percent to *** percent. U.S. producers' market share was *** percent in interim 2019, compared with *** percent in interim 2018, and the market share for imports from China was *** percent in interim 2019, compared with *** percent in interim 2018. During 2016-18, the market share for imports from nonsubject sources increased from *** percent to *** percent and was *** percent in interim 2019, compared with *** percent in interim 2018.

Table IV-8

WCVs: Apparent U.S. consumption and market shares for fully assembled WCVs, 2016-18, January to September 2018, January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	372,119	452,109	540,891	370,859	407,154
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (full units and components) (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Apparent U.S. consumption and market shares for RTA flat pack WCVs

Table IV-9 presents apparent U.S. consumption and market share data for RTA flat pack WCVs based on value. Apparent U.S. consumption of RTA flat pack WCVs increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018.¹⁶ The increase in apparent U.S. consumption of RTA flat pack WCVs from 2016 to 2018 was largely a reflection of the increase in U.S. importers' U.S. shipments from China. U.S. producers' U.S. shipments of RTA flat pack WCVs, conversely, decreased during this period.

The market share for U.S. producers decreased from *** percent in 2016 to *** percent in 2018 while the market share for imports from China increased from *** percent to *** percent. The market share for U.S. producers was *** percent in interim 2019, compared with *** percent in interim 2018, and the market share for U.S. imports from China was *** percent in interim 2018 and interim 2019. From 2016 to 2018, the market share of imports from nonsubject sources remained at *** percent. It was *** percent in interim 2019, compared with *** percent in interim 2018. Figure IV-3 presents data on the share of U.S. producers' and U.S. importers' U.S. shipments of full-unit WCVs by each assembly type.

¹⁶ According to the Petitioner and Respondent ACCI, demand for WCVs is driven by new construction and remodeling. Petitioner's prehearing brief, p. 8 and Respondent ACCI's prehearing brief, p. 4. Demand trends are discussed in more detail in Part II.

Table IV-9

WCVs: Apparent U.S. consumption and market shares for RTA flat pack WCVs, 2016-18, January to September 2018, January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	371,054	434,779	533,505	406,138	409,207
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (full units and components) (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires and official US. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Figure IV-3
WCVs: U.S. producers' and U.S. importers' U.S. shipments of full-unit WCVs by assembly type,
2018

* * * * *

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Part V: Pricing data

Factors affecting prices

Raw material costs

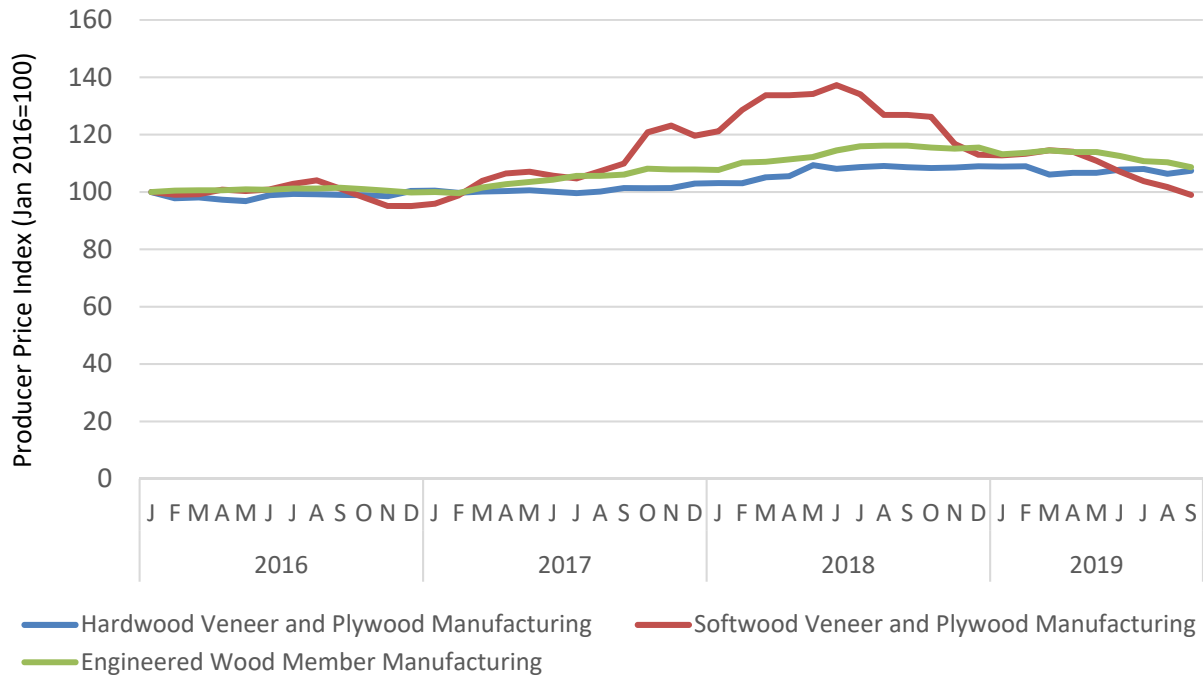
WCVs are manufactured wholly or in part from wood products, including solid wood and engineered wood products (e.g., plywood, strand board, block board, particle board, or fiberboard).¹ WCVs may also contain non-wood material, including glass, vinyl, plastics, metal drawer slides, metal door hinges, organizing racks, dividers, shelves, lazy Susans, or other accessories.² Raw materials accounted for approximately half of the cost of goods sold (COGS) during 2016-18 and the first three quarters of 2019.

The price of wood products increased during 2016-18 (figure V-1). The prices of hardwood veneer and plywood, softwood veneer and plywood, engineered wood, and other types of wood products followed similar patterns: the prices were relatively stable in 2016 through March 2017 and increased into 2018, each peaking between May and August. A majority of producers, importers, and purchasers indicated that the Section 301 tariffs that took effect in March 2018 raised raw material prices in the WCV industry. At their respective peaks thereafter, softwood veneer and plywood prices reached levels 37.3 percent higher than those in January 2016, engineered wood member manufacturing was 16.2 percent higher, and hardwood veneer and plywood was 9.3 percent higher. Price indices for all three have decreased since then; by September 2019 the softwood veneer and plywood price index was below January 2016 levels for the first time (by 1.0 percent). Price indices for engineered wood member manufacturing and hardwood veneer and plywood were still 8.6 and 7.4 percent higher in September 2019 than in January 2016, respectively.

¹ Petition, p. 8.

² Ibid.

Figure V-1
Producer price indices: hardwood veneer and plywood, softwood veneer and plywood, and engineered wood member manufacturing, monthly, January 2016-September 2019



Source: Bureau of Labor Statistics, Producer Price Index Industry Data, <https://data.bls.gov/cgi-bin/dsrv?pc>, retrieved January 15, 2020.

The vast majority of U.S. producers and importers reported that the cost of raw materials have generally increased since 2016. Specifically, firms stated that the cost of solid wood, finishing materials, hardware, and panel products have all increased. Firms also reported that U.S. tariffs, such as the Section 301 duties and the hardwood plywood antidumping and countervailing duties, have increased raw material costs. Importer *** stated that China has imposed a 25 percent duty on all imported lumber from the United States, including maple and oak, which it uses to produce its cabinets. One producer, *** reported that Chinese tariffs on hardwood lumber exports have caused hardwood prices to go down somewhat due to a domestic glut of hardwood. Some firms reported that the increased raw material cost has caused them to change wood species. Most purchasers were unfamiliar with raw material costs for the production of WCVs, but 11 of 32 responding purchasers indicated that the price of raw materials affects their negotiations or contract negotiations with suppliers.

Transportation costs to the U.S. market

Transportation costs for WCVs shipped from China to the United States averaged 5.9 percent during 2018. These estimates were derived from official U.S. import data and represent the transportation and other charges on imports.³

U.S. inland transportation costs

Most responding U.S. producers (***) and importers (56 of 75) reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 1 to 15 percent, averaging 7.4 percent, while most importers reported costs of 1 to 20 percent, with an average of 7.4 percent.⁴

Pricing practices

Pricing methods

U.S. producers and importers reported using transaction-by-transaction negotiations, contracts, price lists, and other methods to set prices (table V-1). Price lists were used most frequently by both producers and importers. Producers more frequently used contracts than importers. Other methods included price quotes for custom projects, which may consider volume and lead time; using discount multipliers; and using methods that take into account purchaser, size, style, and species. Of the 41 responding purchasers, 23 reported their purchases involve negotiations. Most negotiations reportedly involve pricing aspects (including discounts, incentives, rebates, etc.), although some reported doing so only for new suppliers. Quality, lead times, and payment terms were also reported by multiple purchasers.

U.S. producers reported that slightly more than half of their 2018 U.S. commercial shipments were on a contract basis, and most of the remainder were on a spot basis (table V-2). On the other hand, the vast majority of subject import shipments were sold on a spot basis.

³ The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2018 and then dividing by the customs value based on the HTS statistical reporting number 9403.40.9060.

⁴ Producers and importers reporting inland transportation costs greater than 50 percent were removed from the respective averages.

Table V-1**WCVs: U.S. producers' and importers' reported price setting methods, by number of responding firms**

Method	U.S. producers	Importers
Transaction-by-transaction	***	28
Contract	***	13
Set price list	***	50
Other	***	10
Responding firms	49	81

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.

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

Table V-2**WCVs: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2018**

Type of sale	U.S. producers	Importers
Long-term contracts	26.8	10.9
Annual contracts	20.9	7.6
Short-term contracts	9.8	6.3
Spot sales	42.5	75.2
Total		

Note: Because of rounding, figures may not add to the totals shown.

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

U.S. producers reported that their long-term contracts can last from just over a year to five years, or can be “open ended”, and typically allow for price renegotiation. Short-term and annual contracts were split nearly evenly between allowing and not allowing for price renegotiation. Prices were reported to be fixed in all responding producers’ contract, and between one-third and two-thirds also fix quantities, depending on contract length. U.S. producers’ short-term contracts typically last from 16 to 250 days. Eleven importers reported using short-term contracts, five use annual contracts, and nine use long-term contracts. The majority of responding firms that sell under any type of contract do not index wooden cabinet and vanities prices to raw material prices; four U.S. producers and one importer reported indexing contracts to raw material prices, and cited the Hardwood Market Material Report and the Hardwood Review Weekly as sources for indexing. U.S. producer *** stated that the Hardwood Market Material Report is used only as a reference.

Twenty-two purchasers reported that they purchase product daily, 12 purchase weekly, 5 purchase monthly, and 1 quarterly. Thirty-three of 41 responding purchasers reported that their purchasing frequency had not changed since 2016. Most (23 of 37) responding purchasers contact a maximum of 2 to 4 suppliers before making a purchase. Some larger firms contact more potential suppliers; *** reported contacting between 5-10 and 10-15, respectively, *** reported contacting between 1 and

“100+” suppliers, and *** reported contacting between 100 and 500 suppliers.

One other factor that reportedly influenced prices during the period was the imposition of Section 301 tariffs of 10 percent on WCVs from China which were imposed in March 2018. Sixty-seven of 73 responding importers and 29 of 35 responding purchasers (four of seven of which were also U.S. producers) indicated that the tariffs increased prices in the market. Ten producers also indicated this, though 14 producers indicated that the tariffs had no effect, and 2 indicated that it caused price fluctuations, and 2 reported that the tariffs decreased prices in the market for WCVs. Preliminary antidumping and countervailing duties were also noted by importers as influencing market prices.

Sales terms and discounts

Slightly more U.S. producers quote prices on a delivered basis (***) than on an f.o.b. basis (***), while a majority of importers (55 of 80) typically quote prices on an f.o.b. basis.⁵ Most responding U.S. producers and importers reported offering quantity, total volume, and other discounts, including promotional discounts, discounts by customer type (e.g., distributor, dealer, contractor, retail) or project type, loyalty programs, and prompt payment terms. In the preliminary phase, U.S. producer *** stated that promotions have become the “norm” in the industry, and there is tremendous pressure to have aggressive promotions to compete against lower price point products, primarily from China. U.S. producer *** stated that standard industry practice is to use set price lists and then apply a purchasing multiplier or cost factor to customers.

Price leadership

Purchasers reported that 20 suppliers displayed price leadership in the WCVs market. They most frequently cited firm was Masterbrand (noted by eight purchasers), the largest cabinet manufacturer in North America and also an importer of WCVs.⁶ Fabuwood (noted by 5 purchasers), American Woodmark, Masco, TSG, and producers in China generally (3 purchasers each),⁷ along with Forevermark, J&K, JSI, RSI, and Woodcraft (2 purchasers each) were reported by multiple purchasers as price leaders.

⁵ This includes four importers who sell on both an f.o.b. and delivered basis.

⁶ “About Masterbrand,” <https://www.masterbrand.com/dealers/fl/punta-gorda/057324a00042/>, retrieved January 17, 2020.

⁷ All purchasers reporting producers in China as price leaders were also U.S. producers.

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 WCVs products shipped to unrelated U.S. customers during January 2016-September 2019.

Product 1.-- Assembled 30" width x 24" depth x 34-35" height base cabinet with three or four drawers, painted, plywood box construction, shaker style or flush face doors

Product 2.-- Assembled 30" width x 12" depth x 30" height wall cabinet with two doors, painted, plywood box construction, shaker style or flush face doors

Product 3.-- Assembled 36" width x 24" depth x 34-35" height sink base with two doors and one or two faux drawer faces, painted, plywood box construction, shaker style or flush face doors

Product 4.-- Assembled 36" width x 36" depth x 34-35" height corner cabinet with lazy Susan, painted, plywood box construction, shaker style or flush face doors

Product 5a.-- Assembled 18" width x 24" depth x 34-35" height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors

Product 5b.-- RTA 18" width x 24" depth x 34-35" height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors

Product 6a.-- Assembled 24" width x 21" depth x 34-35" height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors

Product 6b.-- RTA 24" width x 21" depth x 34-35" height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors

Thirty-one U.S. producers and 46 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.⁸ Pricing data for products 1-4, 5a, and 6a reported by these firms accounted for approximately 0.7 percent of the value of U.S. producers' commercial U.S. shipments of WCV full units and 1.0 percent of the value of all shipments of full-unit subject imports from China in 2018.^{9 10} Additionally, pricing data for products 5b and 6b account for *** and 1.0 percent of the value of U.S. producers' and importers' RTA flat pack shipments in 2018, respectively.¹¹ Nineteen importers provided usable landed, duty-paid import purchase costs as well.^{12 13 14}

⁸ 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.

⁹ Several firms reported price data that were unusable for a number of reasons, including submitting retail, internal consumption, f.o.b. China port costs, or price list data as price data; products that did not meet the product definitions; supplying data for pricing products for which no commercial shipments were reported; or not supplying both quantity and value data. This includes data from producers *** and importers ***. Staff has not included these data in the pricing data.

¹⁰ Based on comments received from parties to increase comparability in the final phase, additional descriptive criteria were added to the pricing product descriptions which would be expected to lead to decreased product coverage.

¹¹ On a quantity basis, overall coverage was 0.7 percent and 2.3 percent of full-unit commercial shipments for U.S. producers and importers in 2018, respectively.

¹² Several firms reported direct import cost data that were unusable for a number of reasons including submitting retail, internal consumption, f.o.b. China port costs, or price list data as landed, duty paid cost data; products that did not meet the product definitions; supplying data for products for which no internal consumption/were reported; or not supplying both quantity and value data. This includes data from ***. Staff has not included these data in the cost data.

¹³ These data represent an additional *** percent of imports in 2018.

¹⁴ Assembled product pricing data accounted for 1.2 percent of the value of U.S. shipments of fully assembled domestic WCVs in 2018 and 3.3 percent of the value of imports of the same. RTA flat pack pricing product data accounted for *** percent of the value of U.S. shipments of domestic RTA WCVs in 2018 and *** percent of the value of imports of the RTA flat pack WCVs.

Price data for products 1-6b are presented in tables V-3 to V-10 and figures V-2 to V-9. U.S. producers and importers were asked to report the share of their 2018 sales, by product, which were sold as fully assembled cabinets and as RTA flat packs.¹⁵ One producer (***) reported sales of product 5b and 6b, the two RTA flat pack products. All other producers reported that all their commercial sales were of fully assembled pricing products, while data for sales of imports covered all 8 pricing products. Nearly all landed, duty-paid cost data reported by importers were for the RTA flat pack products 5b and 6b.¹⁶ In addition to the pricing data, landed, duty-paid imports costs are also presented in tables V-3 to V-10.

In general, reported price data from producers and importers contained large variations among prices for the 8 pricing products, not only across pricing products, but also across producers or importers. Producers and importer reported a number of possible reasons for such variations, including those such as product lines, stock/semi-custom/custom cabinet differences, special pricing on plywood cabinets in some territories, pricing to different types of purchasers (dealers, retailers, end users, etc.), added modifications such as clipped or fluted corners or angles, soft-close drawers and doors, custom finishing techniques such as rub-thru or distressing.¹⁷ Individual producer and importer average price levels for each product are presented in figure V-10.

¹⁵ Products 5a and 5b, as well as 6a and 6b, share the same product characteristics, but are differentiated based on assembly. Price data for imports are reported for products made of components made in China but assembled in the United States. Landed, duty-paid cost data reflect the form of the pricing product when imported.

¹⁶ Importer *** reported landed, duty-paid cost data for assembled product 6a, which it imported in an assembled state.

¹⁷ See, e.g., emails from *** and ***.

Table V-3

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	497.25	7,397	209.81	1,094	57.8	--	0	--
Apr.-June	489.60	7,637	235.04	1,157	52.0	--	0	--
July-Sept.	485.13	7,724	219.62	1,447	54.7	--	0	--
Oct.-Dec.	483.53	8,103	214.41	1,434	55.7	--	0	--
2017:								
Jan.-Mar.	488.41	8,815	206.39	1,808	57.7	--	0	--
Apr.-June	483.80	9,356	200.38	2,288	58.6	--	0	--
July-Sept.	479.63	8,873	197.01	2,540	58.9	--	0	--
Oct.-Dec.	481.00	9,288	216.67	2,347	55.0	--	0	--
2018:								
Jan.-Mar.	488.72	9,918	197.73	3,115	59.5	--	0	--
Apr.-June	495.75	11,174	213.50	3,387	56.9	--	0	--
July-Sept.	494.48	10,839	209.16	3,641	57.7	--	0	--
Oct.-Dec.	484.79	9,717	204.04	4,260	57.9	--	0	--
2019:								
Jan.-Mar.	483.16	9,750	208.32	3,888	56.9	--	0	--
Apr.-June	492.23	10,153	214.14	4,665	56.5	--	0	--
July-Sept.	489.80	10,087	242.63	3,622	50.5	--	0	--

Note: Product 1 - Assembled 30" width x 24" depth x 34-35" height base cabinet with three or four drawers, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-4

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	233.76	6,400	104.99	1,495	55.1	--	0	--
Apr.-June	226.34	7,203	126.82	1,332	44.0	--	0	--
July-Sept.	217.72	7,353	124.84	1,454	42.7	--	0	--
Oct.-Dec.	225.73	7,216	107.74	2,104	52.3	--	0	--
2017:								
Jan.-Mar.	210.40	8,830	125.04	2,302	40.6	--	0	--
Apr.-June	230.71	8,651	114.64	2,901	50.3	--	0	--
July-Sept.	217.53	8,668	114.68	3,205	47.3	--	0	--
Oct.-Dec.	277.45	7,082	122.44	2,966	55.9	--	0	--
2018:								
Jan.-Mar.	234.37	7,927	138.34	4,148	41.0	--	0	--
Apr.-June	237.22	8,940	110.32	4,694	53.5	--	0	--
July-Sept.	221.92	9,907	113.34	4,753	48.9	--	0	--
Oct.-Dec.	225.12	8,450	105.38	5,521	53.2	--	0	--
2019:								
Jan.-Mar.	200.36	8,774	115.77	4,733	42.2	--	0	--
Apr.-June	201.11	8,990	114.45	5,639	43.1	--	0	--
July-Sept.	210.33	8,417	115.42	5,219	45.1	--	0	--

Note: Product 2 - Assembled 30" width x 12" depth x 30" height wall cabinet with two doors, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-5

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 3 and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	236.97	8,495	131.36	1,908	44.6	--	0	--
Apr.-June	231.51	10,581	141.84	1,953	38.7	--	0	--
July-Sept.	230.85	10,196	136.38	2,584	40.9	--	0	--
Oct.-Dec.	236.09	9,996	129.71	2,663	45.1	--	0	--
2017:								
Jan.-Mar.	242.44	10,155	138.75	2,723	42.8	--	0	--
Apr.-June	243.81	11,300	140.29	3,170	42.5	--	0	--
July-Sept.	248.96	10,696	137.04	3,841	45.0	--	0	--
Oct.-Dec.	245.12	10,874	139.27	3,818	43.2	--	0	--
2018:								
Jan.-Mar.	254.03	10,976	134.61	4,325	47.0	--	0	--
Apr.-June	259.28	12,324	129.45	6,491	50.1	--	0	--
July-Sept.	244.47	13,210	133.97	6,010	45.2	--	0	--
Oct.-Dec.	255.32	11,140	137.53	6,513	46.1	--	0	--
2019:								
Jan.-Mar.	240.51	13,283	132.48	6,050	44.9	--	0	--
Apr.-June	239.87	13,756	144.18	7,150	39.9	--	0	--
July-Sept.	248.62	12,330	149.76	6,916	39.8	--	0	--

Note: Product 3 - Assembled 36" width x 24" depth x 34-35" height sink base with two doors and one or two faux drawer faces, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-6

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 4 and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	465.42	6,046	231.67	1,963	50.2	--	0	--
Apr.-June	461.66	8,132	240.03	2,439	48.0	--	0	--
July-Sept.	468.73	7,383	247.13	2,617	47.3	--	0	--
Oct.-Dec.	468.68	7,478	242.71	2,391	48.2	--	0	--
2017:								
Jan.-Mar.	456.67	8,445	227.39	3,522	50.2	--	0	--
Apr.-June	450.46	10,267	236.75	4,014	47.4	--	0	--
July-Sept.	455.70	9,257	232.57	4,167	49.0	--	0	--
Oct.-Dec.	460.47	8,896	232.14	4,132	49.6	--	0	--
2018:								
Jan.-Mar.	461.85	9,315	227.98	4,724	50.6	--	0	--
Apr.-June	472.39	11,135	231.70	5,558	51.0	--	0	--
July-Sept.	471.37	10,250	233.32	5,604	50.5	--	0	--
Oct.-Dec.	467.63	9,546	247.32	5,431	47.1	--	0	--
2019:								
Jan.-Mar.	440.82	10,556	219.80	6,674	50.1	--	0	--
Apr.-June	441.71	10,762	239.30	7,723	45.8	--	0	--
July-Sept.	444.54	10,067	251.96	7,362	43.3	--	0	--

Note: Product 4 - Assembled 36" width x 36" depth x 34-35" height corner cabinet with lazy Susan, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-7

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 5a and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	271.49	9,844	153.58	1,659	43.4	--	0	--
Apr.-June	276.78	12,133	152.98	2,119	44.7	--	0	--
July-Sept.	276.88	11,986	153.89	2,264	44.4	--	0	--
Oct.-Dec.	273.61	12,626	142.17	2,981	48.0	--	0	--
2017:								
Jan.-Mar.	274.97	12,919	143.14	3,202	47.9	--	0	--
Apr.-June	278.74	14,170	149.17	3,795	46.5	--	0	--
July-Sept.	284.37	13,385	146.82	4,717	48.4	--	0	--
Oct.-Dec.	282.48	13,456	147.67	4,717	47.7	--	0	--
2018:								
Jan.-Mar.	288.77	13,692	142.13	5,289	50.8	--	0	--
Apr.-June	296.24	15,941	146.85	6,365	50.4	--	0	--
July-Sept.	298.54	14,527	149.62	6,413	49.9	--	0	--
Oct.-Dec.	297.77	13,457	148.16	6,915	50.2	--	0	--
2019:								
Jan.-Mar.	294.19	13,870	152.11	6,498	48.3	--	0	--
Apr.-June	291.41	14,321	157.99	7,886	45.8	--	0	--
July-Sept.	293.11	13,574	162.03	7,936	44.7	--	0	--

Note: Product 5a - Assembled 18" width x 24" depth x 34-35" height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-8

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 5b and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	***	***	94.36	5,163	***	58.86	3,250	***
Apr.-June	***	***	100.96	5,208	***	65.07	3,030	***
July-Sept.	***	***	101.59	5,875	***	58.15	5,057	***
Oct.-Dec.	***	***	96.03	6,326	***	55.24	4,539	***
2017:								
Jan.-Mar.	***	***	96.49	6,392	***	62.11	4,189	***
Apr.-June	***	***	97.80	6,841	***	63.03	4,934	***
July-Sept.	***	***	93.66	7,422	***	61.12	5,695	***
Oct.-Dec.	***	***	100.45	7,170	***	57.91	6,918	***
2018:								
Jan.-Mar.	***	***	99.72	7,694	***	59.54	6,205	***
Apr.-June	***	***	96.52	9,071	***	60.65	6,409	***
July-Sept.	***	***	100.92	9,029	***	63.42	7,065	***
Oct.-Dec.	***	***	95.72	10,246	***	61.95	9,228	***
2019:								
Jan.-Mar.	***	***	100.14	8,719	***	60.85	7,435	***
Apr.-June	***	***	110.73	9,180	***	61.17	9,815	***
July-Sept.	***	***	112.23	8,131	***	67.45	6,355	***

Note: Product 5b - RTA 18" width x 24" depth x 34-35" height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-9

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 6a and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

Period	Price United States		Price China			LDP cost China		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	270.67	3,303	109.76	649	59.4	--	0	--
Apr.-June	242.34	3,706	114.92	771	52.6	--	0	--
July-Sept.	242.96	3,660	119.22	793	50.9	--	0	--
Oct.-Dec.	252.85	3,662	108.26	910	57.2	--	0	--
2017:								
Jan.-Mar.	255.31	4,100	117.23	1,140	54.1	--	0	--
Apr.-June	245.81	4,434	113.00	1,372	54.0	--	0	--
July-Sept.	239.27	4,244	113.57	1,658	52.5	--	0	--
Oct.-Dec.	252.62	3,980	119.03	1,512	52.9	***	***	***
2018:								
Jan.-Mar.	260.31	4,432	107.42	1,910	58.7	***	***	***
Apr.-June	258.18	4,949	105.94	2,450	59.0	***	***	***
July-Sept.	260.23	4,470	103.14	2,575	60.4	***	***	***
Oct.-Dec.	262.80	4,020	105.12	2,718	60.0	***	***	***
2019:								
Jan.-Mar.	248.59	4,200	117.86	2,500	52.6	***	***	***
Apr.-June	243.44	4,541	118.73	3,282	51.2	***	***	***
July-Sept.	243.05	4,506	125.38	3,254	48.4	***	***	***

Note: Product 6a - Assembled 24" width x 21" depth x 34-35" height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

Table V-10

WCVs: Weighted-average f.o.b. prices and quantities of domestic and imported product 6b and margins of underselling/(overselling), and landed, duty-paid import costs, by quarter, January 2016-September 2019

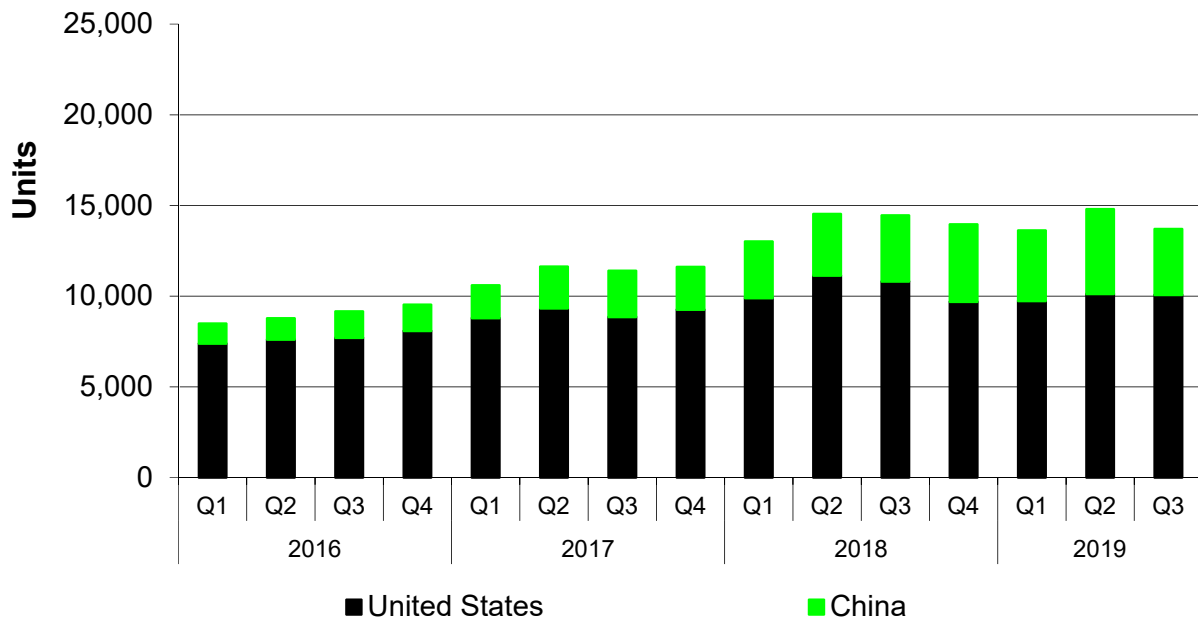
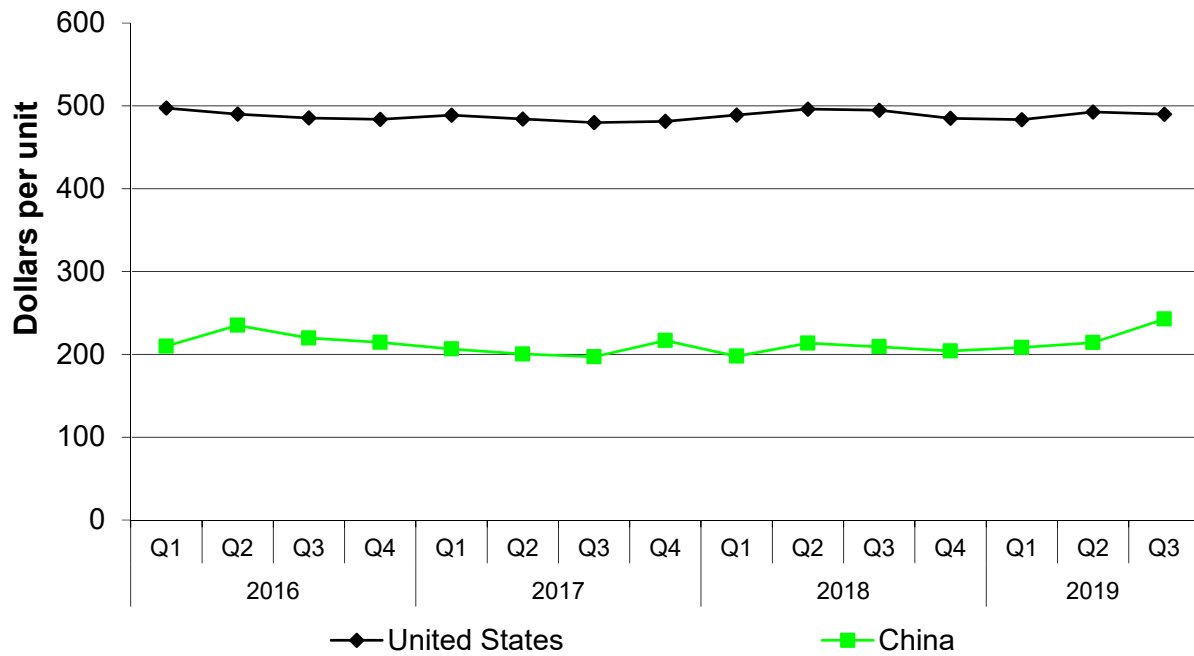
Period	United States price		China price			China LDP cost		
	Price (dollars per cabinet)	Quantity (cabinets)	Price (dollars per cabinet)	Quantity (cabinets)	Margin (percent)	LDP cost (dollars per cabinet)	Quantity (cabinets)	Price-cost differential (percent)
2016:								
Jan.-Mar.	***	***	105.83	2,055	***	57.19	1,246	***
Apr.-June	***	***	98.28	3,118	***	56.53	1,536	***
July-Sept.	***	***	100.05	3,178	***	54.62	2,253	***
Oct.-Dec.	***	***	97.47	3,444	***	55.44	1,932	***
2017:								
Jan.-Mar.	***	***	99.23	3,614	***	57.22	1,868	***
Apr.-June	***	***	95.89	4,602	***	55.82	2,803	***
July-Sept.	***	***	97.10	4,434	***	59.74	2,405	***
Oct.-Dec.	***	***	106.50	4,155	***	57.33	2,829	***
2018:								
Jan.-Mar.	***	***	103.21	4,591	***	59.66	2,566	***
Apr.-June	***	***	89.01	5,677	***	58.11	3,681	***
July-Sept.	***	***	96.60	5,408	***	59.33	3,452	***
Oct.-Dec.	***	***	99.74	5,479	***	59.65	4,361	***
2019:								
Jan.-Mar.	***	***	108.92	4,750	***	59.53	6,029	***
Apr.-June	***	***	101.73	7,198	***	59.54	7,426	***
July-Sept.	***	***	117.81	5,138	***	69.12	3,867	***

Note: Product 6b - RTA 24" width x 21" depth x 34-35" height vanity base with two doors and faux drawer face, no attached countertop or sink, painted, plywood box construction, shaker style or flush face doors.

Note: LDP import value does not include any potential additional costs that a purchaser may incur by importing rather than purchasing from another importer or U.S. producer. Price-cost differentials are based on LDP import values whereas margins of underselling/overselling are based on importer sales prices.

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

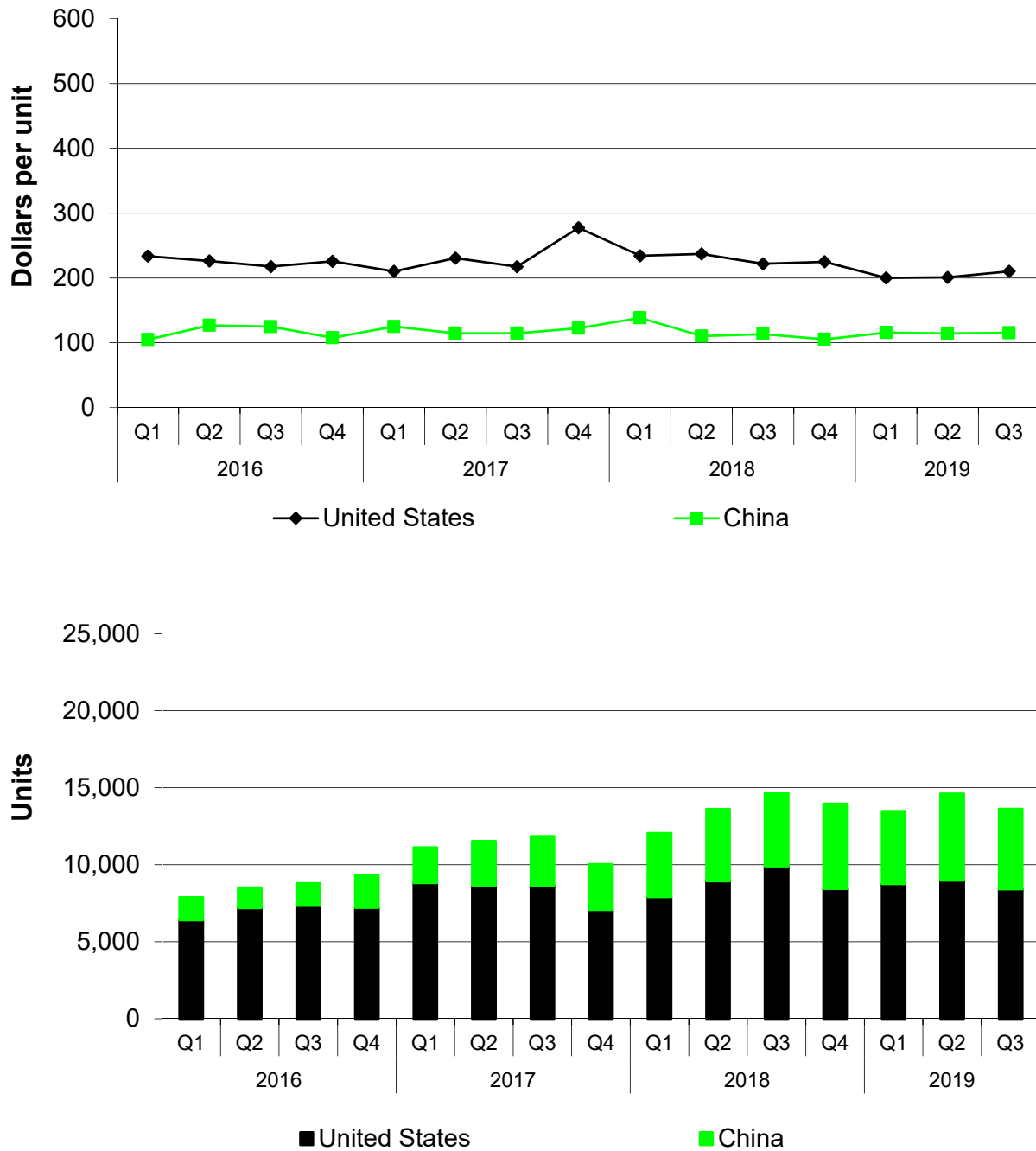
Figure V-2
WCVs: Weighted-average prices and quantities of domestic and imported product 1, by quarter, January 2016-September 2019



Product 1: Assembled 30" width x 24" depth x 34-35" height base cabinet with three or four drawers, painted, plywood box construction, shaker style or flush face doors.

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

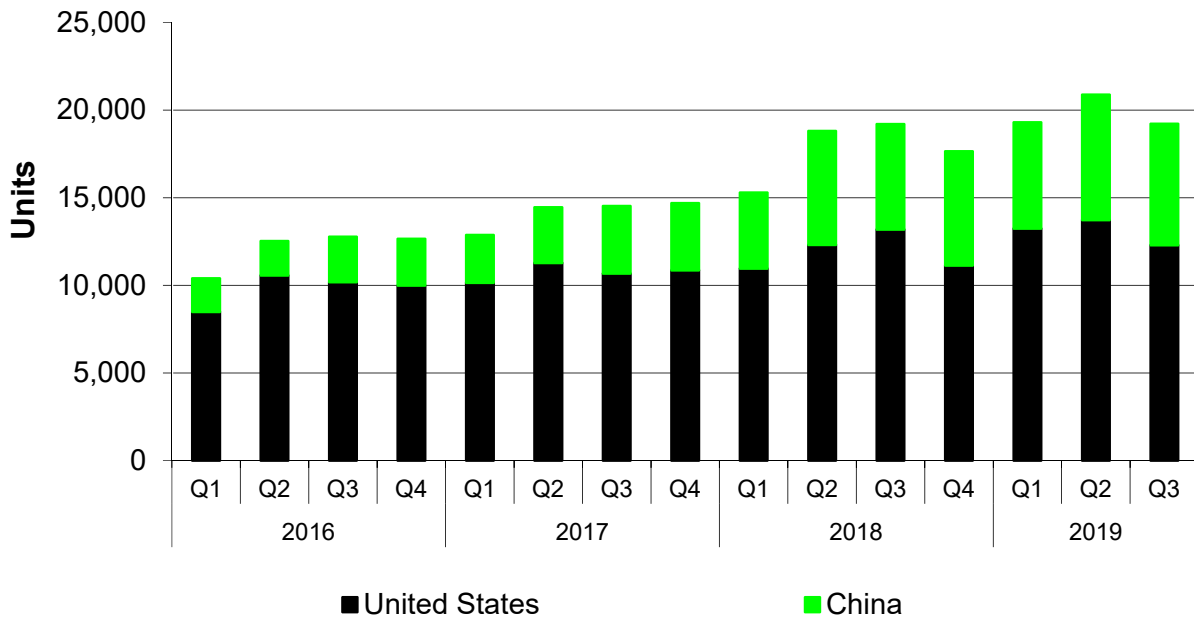
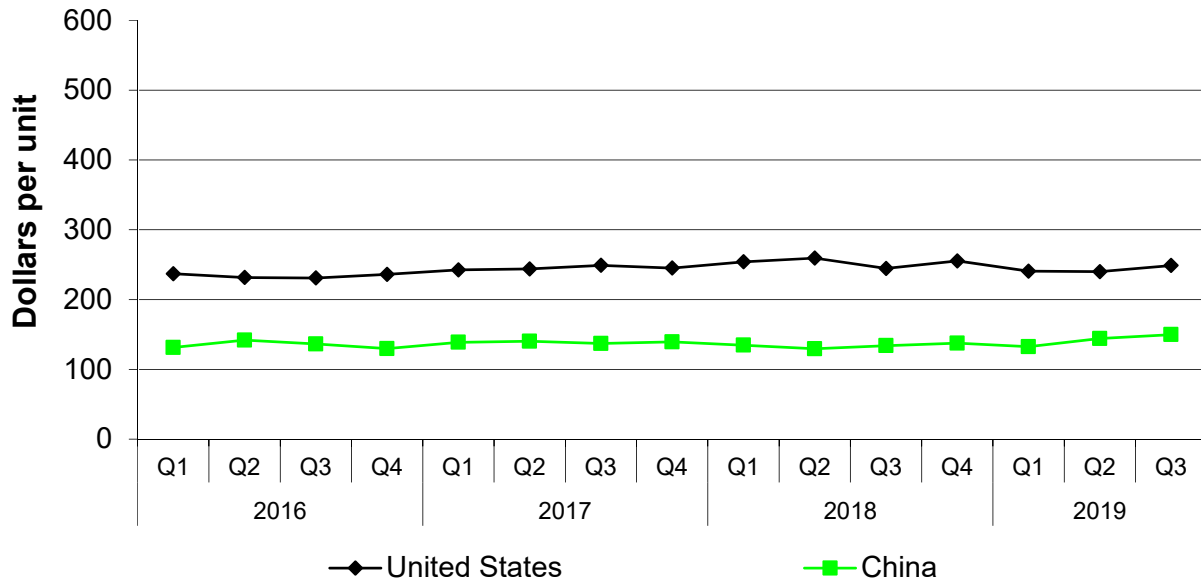
Figure V-3
WCVs: Weighted-average prices and quantities of domestic and imported product 2, by quarter, January 2016-September 2019



Note: Product 2: Assembled 30" width x 12" depth x 30" height wall cabinet with two doors, painted, plywood box construction, shaker style or flush face doors.

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

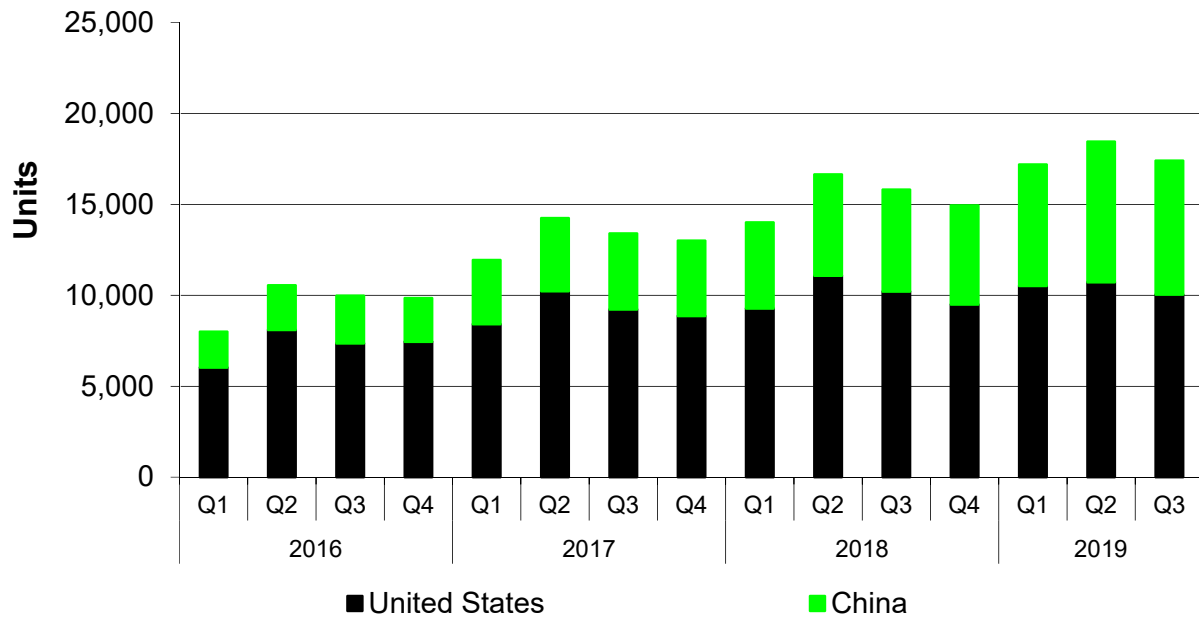
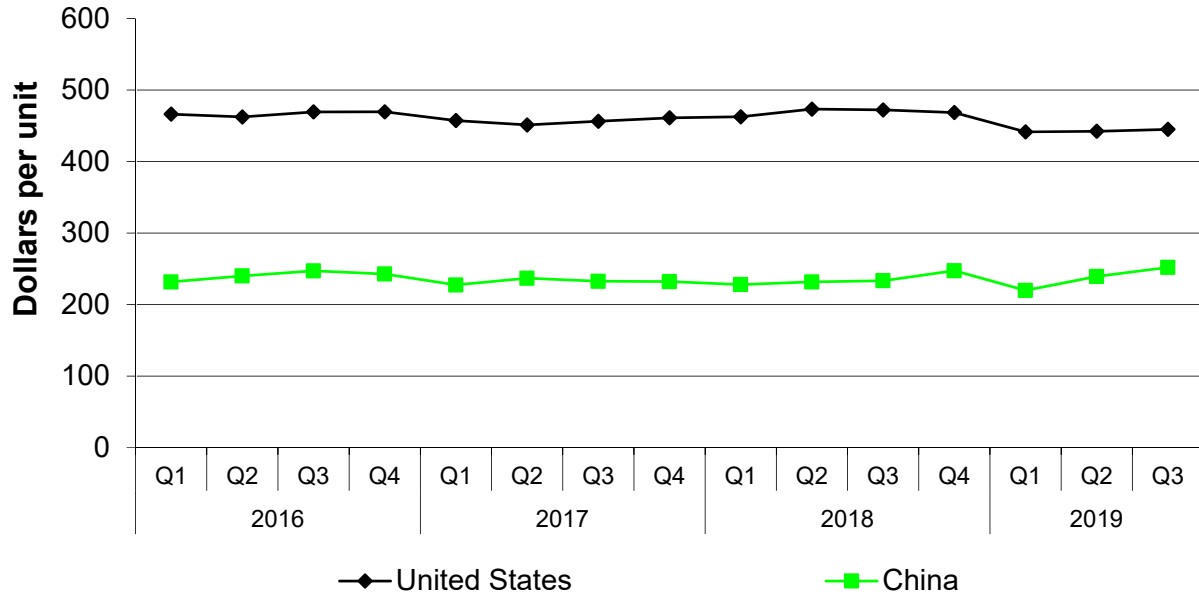
Figure V-4
WCVs: Weighted-average prices and quantities of domestic and imported product 3, by quarter, January 2016-September 2019



Product 3: Assembled 36" width x 24" depth x 34-35" height sink base with two doors and one or two faux drawer faces, painted, plywood box construction, shaker style or flush face doors.

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

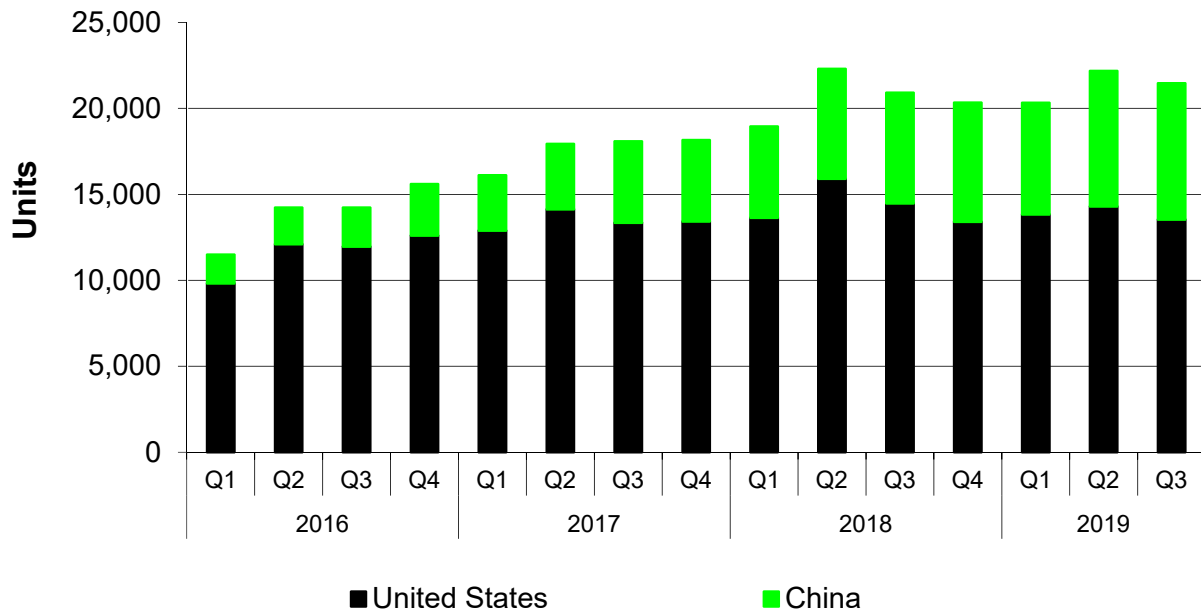
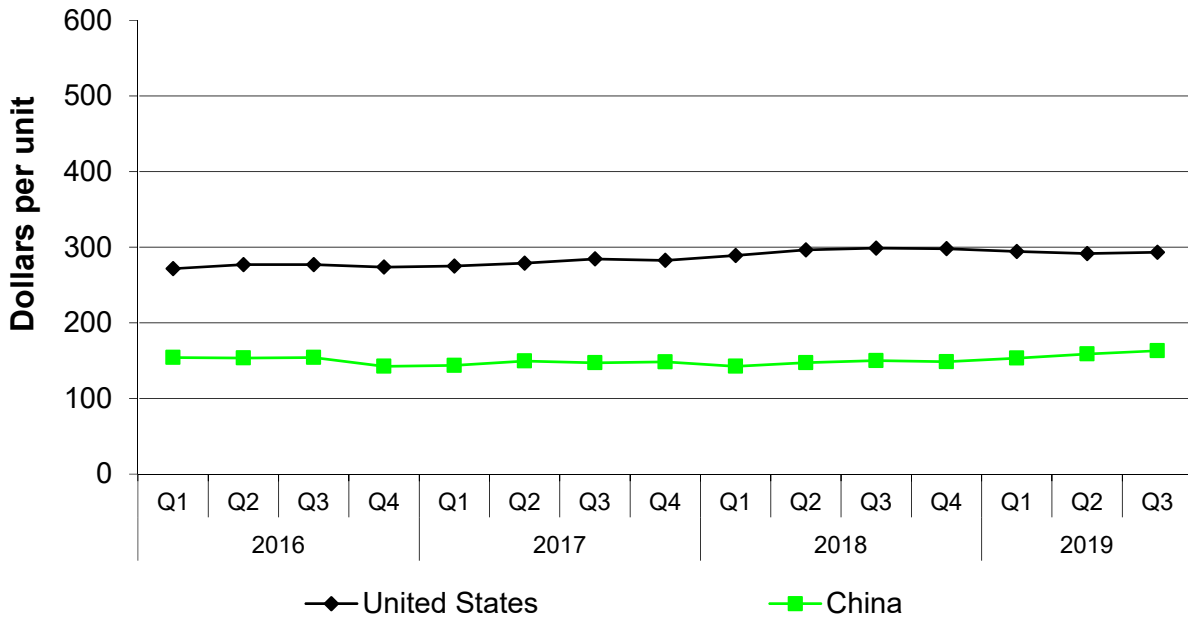
Figure V-5
WCVs: Weighted-average prices and quantities of domestic and imported product 4, by quarter, January 2016-September 2019



Product 4: Assembled 36" width x 36" depth x 34-35" height corner cabinet with Lazy Susan, painted, plywood box construction, shaker style or flush face doors.

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

Figure V-6
WCVs: Weighted-average prices and quantities of domestic and imported product 5a, by quarter, January 2016-September 2019



Note: Product 5a: Assembled 18" width x 24" depth x 34-35" height base cabinet with one door and one drawer, painted, plywood box construction, shaker style or flush face doors.

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

Figure V-7
WCVs: Weighted-average prices and quantities of domestic and imported product 5b, by quarter,
January 2016-September 2019

* * * * *

Figure V-8
WCVs: Weighted-average prices and quantities of domestic and imported product 6a, by quarter,
January 2016-September 2019

* * * * *

Figure V-9
WCVs: Weighted-average prices and quantities of domestic and imported product 6b, by quarter,
January 2016-September 2019

* * * * *

Figure V-10

WCVs: Firm-level unweighted average prices of domestic and imported products 1-4, 5a, 5b, 6a, and 6b, January 2016-September 2019

* * * * *

Price trends

Prices decreased for half of domestic pricing products but increased for all pricing products imported from China during January 2016-September 2019. Table V-11 summarizes the price trends, by country and by product. As shown in the table, domestic price decreases ranged from 1.5 to 10.2 percent during January 2016-September 2019. Prices for assembled domestic products 3 and 5a increased by 4.9 and 8.0 percent, and domestic RTA products 5b and 6b by *** and *** percent, respectively.

Import price increases ranged from 5.3 to 18.9 percent during January 2016-September 2019 and were reflected across all eight pricing products. This is at least in part due to generally increasing prices in 2019, as prices for imported WCVs from China were all higher in the 3rd quarter of 2019 than they were in the 4th quarter of 2018. Landed, duty-paid costs of RTA products 5b and 6b imported from China increased by 14.6 and 20.9 percent, respectively.

Table V-11

WCVs: Summary of weighted-average f.o.b. prices for products 1-6b from the United States and China

Item	Number of quarters	Low price/cost (per unit)	High price/cost (per unit)	Change in price/cost (percent)
Product 1				
United States	15	479.63	497.25	(1.5)
China	15	197.01	242.63	15.6
China – LDP cost	0	---	---	---
Product 2				
United States	15	200.36	277.45	(10.0)
China	15	104.99	138.34	9.9
China – LDP cost	0	---	---	---
Product 3				
United States	15	230.85	259.28	4.9
China	15	129.45	149.76	14.0
China – LDP cost	0	---	---	---
Product 4				
United States	15	440.82	472.39	(4.5)
China	15	219.80	251.96	8.8
China – LDP cost	0	---	---	---
Product 5a				
United States	15	271.49	298.54	8.0
China	15	142.13	162.03	5.5
China – LDP cost	0	---	---	---
Product 5b				
United States	15	***	***	***
China	15	93.66	112.23	18.9
China – LDP cost	15	55.24	67.45	14.6
Product 6a				
United States	15	239.37	270.81	(10.2)
China	15	103.14	125.38	14.2
China – LDP cost	8	***	***	---
Product 6b				
United States	15	***	***	***
China	15	89.01	117.81	11.3
China – LDP cost	15	54.62	69.12	20.9

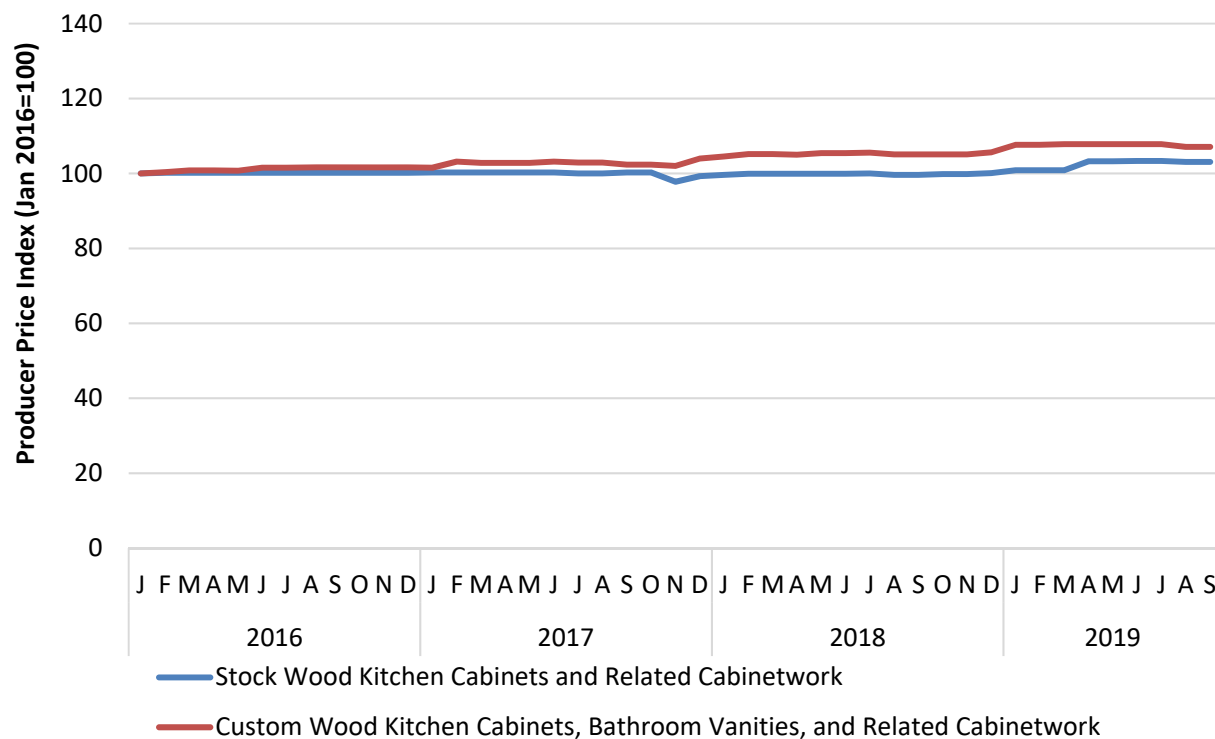
Note: Percentage change in price/cost is from the first quarter in 2016 to the last quarter in 2019 for which data are available.

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

Public price information

Publicly available producer price index data for wood kitchen cabinets indicate that prices were stable to increasing during January 2016 to September 2019. As shown in figure V-11, the price of stock wood kitchen cabinets for permanent installation was mostly stable from January 2016 until April 2019 (with a one-month decline of 3 percent in November 2017), then increased slightly.¹⁸ Overall, the price of stock wood kitchen cabinets increased 3.1 percent between January 2016 and September 2019. The price of custom wood kitchen cabinets and bathroom vanities followed slightly more increasing trend, reaching a level 7.8 percent higher in March 2019 than in January 2016 before declining by less than a percent in August 2019 to end the period at a level 7.1 percent higher than in January 2016.

Figure V-11
Producer price indices: Stock wood kitchen cabinets for permanent installation and custom wood kitchen cabinets, bathroom vanities, and related cabinets, January 2016-September 2019



Source: Bureau of Labor Statistics, Producer Price Index Industry Data, <https://data.bls.gov/cgi-bin/dsrv?pc>, retrieved January 15, 2020.

¹⁸ The Bureau of Labor Statistics does not delineate what is “stock” or “custom,” nor does it provide data for semi-custom wooden cabinets and vanities.

Price comparisons

As shown in table V-12, prices for product imported from China were below those for U.S.-produced product in 115 of 120 instances (***) units); margins of underselling ranged from *** to *** percent and averaged *** percent. Underselling margins for assembled WCV products were considerably higher than those for RTA flat pack products. Margins for products 5a and 6a compared with RTA flat pack products 5b and 6b were *** and *** percent higher, respectively. Margins of overselling were only noted in product 6b, were recorded in 5 quarters, and averaged *** percent.¹⁹

Table V-12
WCVs: Instances of underselling/overselling and the range and average of margins, by country, January 2016-September 2019

Product	Underselling				
	Number of quarters	Quantity (units)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	15	40,693	56.4	50.5	59.5
Product 2	15	52,466	47.7	40.6	55.9
Product 3	15	66,115	43.7	38.7	50.1
Product 4	15	68,322	48.6	43.3	51.0
Product 5a	15	72,756	47.4	43.4	50.8
Product 5b	15	112,467	***	***	***
Product 6a	15	27,494	54.9	48.4	60.4
Product 6b	10	***	***	***	***
Total	115	***	***	***	***
Product	(Overselling)				
	Number of quarters	Quantity (units)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 6b	5	***	***	***	***
Total	5	***	***	***	***

Note: Quantity refers to subject import volume for that product.

Note: Data include only quarters in which there is a comparison between the U.S. and subject product.

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

¹⁹ Data for RTA products 5b and 6b were reported by one producer, ***.

Import purchase cost data

Importers were asked to provide import purchase cost data for their imports of WCVs used for internal consumption, repackaging, or for use at their own retail establishments. As noted earlier, 19 importers provided usable import purchase cost data. Nearly all of these data were for products 5b and 6b, the RTA flat pack cabinet and vanity pricing products.²⁰ These import purchase costs were below the reported sales prices of the similar RTA flat pack products that were imported and sold as RTA flat pack products (products 5b and 6b) in all quarters. The sales price was between \$32.54 and \$49.56 higher than the import purchase cost for product 5 (53.2 to 81.0 percent), and \$30.90 and \$49.16 higher than the import purchase cost for product 6 (53.2 to 85.8 percent). The sales prices for assembled product 6a imported from China, however, were below *** landed-duty paid costs of this product by \$*** (***) percent lower), though the difference steadily narrowed between the fourth quarter of 2018 and the third quarter of 2019.

In addition to the import purchase cost data, firms were asked to estimate a variety of costs associated with their imports for internal use, including inland transportation costs, logistical or supply chain management costs, warehousing/inventory carrying costs, and insurance costs. Usable inland transportation costs from the port of importation to the importer's distribution network, retail store, or manufacturing plant were reported by 24 importers, averaged 6.0 percent, but ranged up to 15 percent (reported by three importers).²¹ Multiple firms reported estimates for the following costs: logistical costs (0.5 to 15.5 percent, average 6.4 percent), inventory carrying costs (4 to 20 percent, average 11.8 percent), insurance costs (0.1 to 10 percent, average 2.4 percent). Some responding firms broke out additional costs: administrative selling costs (***) percent) and SG&A (***) percent); assembly labor and other miscellaneous costs (***) percent); cabinet building and packaging costs (***) percent); employee salaries, utility bills, fork lift rentals and other assets purchased needed for the business (***) percent); and other related overhead costs (***) percent).

²⁰ Importer *** reported import purchase cost data for ***.

²¹ Data for the firm reporting "70 percent" or four firms reporting "100 percent" were not used in this calculation.

When asked to which source(s) they compare costs in determining their additional transaction costs for importing WCVs directly, eight compare to other U.S. importers, three compare to U.S. importers and producers, and 15 compare to neither. Eleven importers reported that they saved between 10 and 50 percent from importing directly rather than purchasing already imported WCVs and five reported having saved 0 percent from doing so. Importers reported a variety of benefits from having imported directly instead of purchasing WCVs from a U.S. importer or U.S. producer. These benefits include: an absence of RTA manufacturing domestically or inability to meet RTA volume requirements, availability of different wood species, better handling, transportation, and movement into install site for RTA cabinets, consistent inventory, “cabinets you can design and brand,” increased ability to ensure import compliance and control shipping dates, low or no availability of marble- or quartz-top furniture style vanities from U.S. producers, lower cost, lower supply chain management costs than other importers, a need to keep inventory on hand, related production facilities overseas, shorter wait times,²² and superior finish overseas.

²² One importer added that U.S. producers source components from China and other sources, which adds to those suppliers’ production time.

Lost sales and lost revenue

The Commission requested that U.S. producers of WCVs report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of WCVs from China during 2016-18. In the final phase of these investigations, *** responding producers reported that they had to reduce prices, *** reported they had to roll back announced price increases, and *** firms reported that they had lost sales. Eight U.S. producers submitted lost sales and lost revenue allegations, identifying 161 firms where they lost sales or revenue (81 consisting lost sales allegations, 12 consisting of lost revenue allegations, and 77 consisting of both types of allegations). The majority of allegations were in 2017 and 2018, and a few allegations were in 2019 and 2020.

Staff contacted 145 purchasers and received responses from 46 purchasers.²³ Responding purchasers reported buying \$*** of WCVs during 2016-18 (table V-13).

Table V-13
WCVs: Purchasers' responses to purchasing patterns

Purchaser	Purchases and imports, Jan. 2016- Sept. 2019 (1,000 dollars)			Change in domestic share (pp, 2016-18)	Change in subject country share (pp, 2016-18)
	Domestic	Subject	All other		
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

²³ Three potential purchasers reported that they had not purchased subject product since January 1, 2016.

domestic product mostly noted overall demand growth or increases in home sales.²⁵ Sixteen responding importers reported increased purchases of WCVs imported from China, 10 reported decreases, 4 reported constant purchases, and 2 reported fluctuating purchases.

Of the 41 responding purchasers, 24 reported that, since 2016, they had purchased imported WCVs from China instead of U.S.-produced product. All but one of these purchasers reported that subject import prices were lower than U.S.-produced product, and 18 of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Sixteen purchasers estimated the value of WCVs from China purchased instead of domestic product; values ranged from \$*** to \$*** (table V-14).²⁶ Purchasers identified availability of RTA cabinets, availability of substrate, availability of vanities with ceramic/granite tops attached, quality, standard plywood and soft close doors, and quality as non-price reasons for purchasing imported rather than U.S.-produced product.

**Table V-14
WCVs: Purchasers' responses to purchasing subject imports instead of domestic product**

Purchaser	Purchased imports instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity purchased instead of domestic (\$1,000)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***

Table continued on next page.

²⁵ Eight purchasers did not purchase U.S.-made WCVs, 6 did not purchase those made in China, 18 did not purchase WCVs made in nonsubject countries.

²⁶ *** reported that this total represents imports that ***. Although its imports from all other countries was more than *** than its imports from China, it characterized these imports as a “***.”

Of the 27 responding purchasers, 18 reported that U.S. producers had not reduced prices in order to compete with lower-priced imports from China, while the remaining 9 reported that U.S. producers had (table V-15).²⁷ Some of these firms (***) are also U.S. manufacturers who may import cabinets, vanities, and/or components for cabinets and vanities. Only three of the nine purchasers reporting price decreases were not U.S. producers. Two of these three non-producer purchasers, along with three producer purchasers, reported that it was mainly in the form of restricted price increases. The reported estimated price reductions/restricted increases ranged from 2 to 25 percent. U.S. producers have indicated that, in addition, they have had to include as standard features that used to be upgrades such as plywood construction or soft-close doors and drawers.²⁸

Table V-15
WCVs: Purchasers' responses to U.S. producer price reductions

Purchaser	U.S. producers reduced priced to compete with subject imports (Y/N)	If U.S. producers reduced prices	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***

Table continued on next page.

²⁷ Five of the nine purchasers reporting U.S. producer price decreases were U.S. producers.

²⁸ Hearing transcript, p. 72 (Fritz).

Part VI: Financial experience of U.S. producers

Background

Forty-seven U.S. producers provided usable financial results on their WCV operations.¹ Thirty-eight of the responding U.S. producers reported financial data on a calendar year basis.² Forty-six of the responding U.S. producers provided their financial data on the basis of generally accepted accounting principles (“GAAP”).³ Net sales of WCVs include both full units and merchant market components (“components”). Net sales of full units, by value, accounted for *** percent of total net sales revenue of WCVs in 2018. While WCV revenue primarily represents commercial sales, a small amount of internal consumption was reported. Internal consumption represented *** percent of full-unit net sales value in 2018, and thus is not shown separately in this section of the report.

Staff verified the results of MasterBrand with its corporate records. The verification adjustments were incorporated into this report. MasterBrand’s U.S. producer questionnaire response was changed to revise ***.⁴

Figure VI-1 presents the six largest responding firms’ share of the total net sales value in 2018. ***.

¹ ***.

² Another five companies reported data on a basis that approximates a calendar year end (e.g., a 4-5-4 year, fiscal year ending the last Sunday of December, etc.). ***.

³ *** reported that its financial data were reported on a tax basis.

⁴ Staff verification report, MasterBrand, March 6, 2020.

Figure VI-1
WCVs: Share of net sales value of 6 largest U.S. producers and all other U.S. producers, 2018

* * * * *

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

Operations on WCVs

Table VI-1 presents aggregated value data on U.S. producers' operations in relation to WCVs for both full units and components during the period examined.⁵ Table VI-2 presents aggregated data on U.S. producers' full-unit operations in relation to WCVs, while table VI-3 presents changes in the average unit value ("AUV") data for the data presented in table VI-2. Table VI-4 presents aggregated value data on U.S. producers' operations in relation to merchant-market components of WCVs. Table VI-5 presents selected company-specific financial data for full units and table VI-6 presents company-specific financial data for components.

⁵ The industry standard reporting unit for WCVs is by full-unit cabinets or vanities. In order to not distort the quantity and unit value data, the Commission's questionnaire requested firms to report income-and-loss data for full units and components separately, with only value data collected for the components. The discussion in this section of the report will focus on combined full units and component data ("combined data") for all value data and ratios to net sales (table VI-1) but will also utilize full unit data for all quantity and AUV discussions (tables VI-2, VI-3, and VI-5). Full units accounted for 93.4 percent of the combined net sales value of WCVs in 2018, therefore using the quantities and AUVs of full units is reasonably representative of the combined data.

Table VI-1

WCVs: Results of full-unit and component operations of U.S. producers, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Total net sales (full units and components)	6,961,732	7,172,873	7,234,966	5,397,132	5,409,664
Cost of goods sold.--					
Raw materials	2,641,958	2,708,322	2,741,215	2,031,690	2,048,695
Direct labor	956,116	991,382	1,005,495	753,220	752,413
Other factory costs	1,577,590	1,661,135	1,775,559	1,312,629	1,323,390
Total COGS	5,175,664	5,360,839	5,522,269	4,097,539	4,124,498
Gross profit	1,786,068	1,812,034	1,712,697	1,299,593	1,285,166
SG&A expense	1,029,604	1,064,413	1,161,149	843,462	833,850
Operating income or (loss)	756,464	747,621	551,548	456,131	451,316
Interest expense	73,591	69,626	74,685	56,673	71,136
All other expenses	113,593	118,815	112,695	52,889	99,504
All other income	1,102	(5,467)	2,759	(6,970)	12,746
Net income or (loss)	570,382	553,713	366,927	339,599	293,422
Depreciation/amortization	172,703	186,639	258,669	191,431	205,051
Cash flow	743,085	740,352	625,596	531,030	498,473
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	37.9	37.8	37.9	37.6	37.9
Direct labor	13.7	13.8	13.9	14.0	13.9
Other factory costs	22.7	23.2	24.5	24.3	24.5
Average COGS	74.3	74.7	76.3	75.9	76.2
Gross profit	25.7	25.3	23.7	24.1	23.8
SG&A expense	14.8	14.8	16.0	15.6	15.4
Operating income or (loss)	10.9	10.4	7.6	8.5	8.3
Net income or (loss)	8.2	7.7	5.1	6.3	5.4
	Ratio to total COGS (percent)				
Cost of goods sold.--					
Raw materials	51.0	50.5	49.6	49.6	49.7
Direct labor	18.5	18.5	18.2	18.4	18.2
Other factory costs	30.5	31.0	32.2	32.0	32.1
Average COGS	100.0	100.0	100.0	100.0	100.0
	Number of firms reporting				
Operating losses	7	7	8	6	6
Net losses	9	9	11	8	8
Data	47	47	47	45	45

Note: ***.

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

Table VI-2

WCVs: Results of full-unit operations of U.S. producers, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Quantity (units)				
Total net sales (full units)	34,829,695	34,904,822	33,687,434	24,954,305	25,263,436
	Value (1,000 dollars)				
Total net sales (full units)	6,503,579	6,697,680	6,756,863	5,028,626	5,056,517
Cost of goods sold.--					
Raw materials	2,452,641	2,508,578	2,535,109	1,872,953	1,899,476
Direct labor	849,448	883,004	898,193	671,825	674,644
Other factory costs	1,498,489	1,573,231	1,683,868	1,241,776	1,247,763
Total COGS	4,800,578	4,964,813	5,117,170	3,786,554	3,821,883
Gross profit	1,703,001	1,732,867	1,639,693	1,242,072	1,234,634
SG&A expense	988,067	1,019,921	1,114,527	809,863	804,737
Operating income or (loss)	714,934	712,946	525,166	432,209	429,897
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	560,691	557,391	357,677	324,540	282,811
Depreciation/amortization	152,956	167,176	238,023	176,032	190,455
Cash flow	713,647	724,567	595,700	500,572	473,266
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	37.7	37.5	37.5	37.2	37.6
Direct labor	13.1	13.2	13.3	13.4	13.3
Other factory costs	23.0	23.5	24.9	24.7	24.7
Average COGS	73.8	74.1	75.7	75.3	75.6
Gross profit	26.2	25.9	24.3	24.7	24.4
SG&A expense	15.2	15.2	16.5	16.1	15.9
Operating income or (loss)	11.0	10.6	7.8	8.6	8.5
Net income or (loss)	8.6	8.3	5.3	6.5	5.6

Table continued on next page.

Table VI-2—Continued

WCVs: Results of full unit operations of U.S. producers, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Ratio to total COGS (percent)				
Cost of goods sold.-- Raw materials	51.1	50.5	49.5	49.5	49.7
Direct labor	17.7	17.8	17.6	17.7	17.7
Other factory costs	31.2	31.7	32.9	32.8	32.6
Average COGS	100.0	100.0	100.0	100.0	100.0
	Unit value (dollars per unit)				
Total net sales (full units)	187	192	201	202	200
Cost of goods sold.-- Raw materials	70	72	75	75	75
Direct labor	24	25	27	27	27
Other factory costs	43	45	50	50	49
Average COGS	138	142	152	152	151
Gross profit	49	50	49	50	49
SG&A expense	28	29	33	32	32
Operating income or (loss)	21	20	16	17	17
Net income or (loss)	16	16	11	13	11
	Number of firms reporting				
Operating losses	7	7	7	5	6
Net losses	8	8	9	7	8
Data	43	43	43	41	41

Note: ***.

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

Table VI-3

WCVs: Changes in AUVs between annual years and interim-year periods (full units only), January-September 2018, and January-September 2019

Item	Between fiscal years			Between partial year period
	2016-18	2016-17	2017-18	2018-19
	Change in AUVs (dollars per unit)			
Total net sales	▲ 13.85	▲ 5.16	▲ 8.69	▼ (1.36)
Cost of goods sold.--				
Raw materials	▲ 4.84	▲ 1.45	▲ 3.38	▲ 0.13
Direct labor	▲ 2.27	▲ 0.91	▲ 1.37	▼ (0.22)
Other factory costs	▲ 6.96	▲ 2.05	▲ 4.91	▼ (0.37)
Average COGS	▲ 14.07	▲ 4.41	▲ 9.66	▼ (0.46)
Gross profit	▼ (0.22)	▲ 0.75	▼ (0.97)	▼ (0.90)
SG&A expense	▲ 4.72	▲ 0.85	▲ 3.86	▼ (0.60)
Operating income or (loss)	▼ (4.94)	▼ (0.10)	▼ (4.84)	▼ (0.30)
Net income or (loss)	▼ (5.48)	▼ (0.13)	▼ (5.35)	▼ (1.81)

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

Table VI-4

WCVs: Results of merchant component operations of U.S. producers, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Total net sales (components)	458,153	475,193	478,103	368,506	353,147
Cost of goods sold.--					
Raw materials	189,317	199,744	206,106	158,737	149,219
Direct labor	106,668	108,378	107,302	81,395	77,769
Other factory costs	79,101	87,904	91,691	70,853	75,627
Total COGS	375,086	396,026	405,099	310,985	302,615
Gross profit	83,067	79,167	73,004	57,521	50,532
SG&A expense	41,537	44,492	46,622	33,599	29,113
Operating income or (loss)	41,530	34,675	26,382	23,922	21,419
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	9,691	(3,678)	9,250	15,059	10,611
Depreciation/amortization	19,747	19,463	20,646	15,399	14,596
Cash flow	29,438	15,785	29,896	30,458	25,207
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	41.3	42.0	43.1	43.1	42.3
Direct labor	23.3	22.8	22.4	22.1	22.0
Other factory costs	17.3	18.5	19.2	19.2	21.4
Average COGS	81.9	83.3	84.7	84.4	85.7
Gross profit	18.1	16.7	15.3	15.6	14.3
SG&A expense	9.1	9.4	9.8	9.1	8.2
Operating income or (loss)	9.1	7.3	5.5	6.5	6.1
Net income or (loss)	2.1	(0.8)	1.9	4.1	3.0
	Ratio to total COGS (percent)				
Cost of goods sold.--					
Raw materials	50.5	50.4	50.9	51.0	49.3
Direct labor	28.4	27.4	26.5	26.2	25.7
Other factory costs	21.1	22.2	22.6	22.8	25.0
Average COGS	100.0	100.0	100.0	100.0	100.0
	Number of firms reporting				
Operating losses	---	---	1	1	---
Net losses	1	1	2	1	---
Data	8	8	8	8	8

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

Table VI-5

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Total net sales (units)				
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Top 12 full-unit producers	30,616,833	30,463,368	29,123,821	21,471,992	21,892,425
All other full-unit producers	4,212,862	4,441,454	4,563,613	3,482,313	3,371,011
All full-unit producers	34,829,695	34,904,822	33,687,434	24,954,305	25,263,436
	Total net sales (1,000 dollars)				
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Top 12 full-unit producers	5,348,773	5,443,239	5,424,255	4,010,181	4,037,060
All other full-unit producers	1,154,806	1,254,441	1,332,608	1,018,445	1,019,457
All full-unit producers	6,503,579	6,697,680	6,756,863	5,028,626	5,056,517

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Cost of goods sold (1,000 dollars)				
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Top 12 full-unit producers	3,939,220	4,030,700	4,119,300	3,034,458	3,070,026
All other full-unit producers	861,358	934,113	997,870	752,096	751,857
All full-unit producers	4,800,578	4,964,813	5,117,170	3,786,554	3,821,883
	Gross profit or (loss) (1,000 dollars)				
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Top 12 full-unit producers	1,409,553	1,412,539	1,304,955	975,723	967,034
All other full-unit producers	293,448	320,328	334,738	266,349	267,600
All full-unit producers	1,703,001	1,732,867	1,639,693	1,242,072	1,234,634

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	SG&A expenses (1,000 dollars)				
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Top 12 full-unit producers	792,813	810,991	879,243	634,346	625,054
All other full-unit producers	195,254	208,930	235,284	175,517	179,683
All full-unit producers	988,067	1,019,921	1,114,527	809,863	804,737
	Operating income or (loss) (1,000 dollars)				
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Top 12 full-unit producers	616,740	601,548	425,712	341,377	341,980
All other full-unit producers	98,194	111,398	99,454	90,832	87,917
All full-unit producers	714,934	712,946	525,166	432,209	429,897

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Net income or (loss) (1,000 dollars)				
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Top 12 full-unit producers	478,371	459,102	284,745	253,521	211,804
All other full-unit producers	82,320	98,289	72,932	71,019	71,007
All full-unit producers	560,691	557,391	357,677	324,540	282,811
	COGS to net sales ratio (percent)				
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***	***	***	***	***	***
Top 12 full-unit producers	73.6	74.0	75.9	75.7	76.0
All other full-unit producers	74.6	74.5	74.9	73.8	73.8
All full-unit producers	73.8	74.1	75.7	75.3	75.6

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Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Gross profit or (loss) to net sales ratio (percent)				
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Top 12 full-unit producers	26.4	26.0	24.1	24.3	24.0
All other full-unit producers	25.4	25.5	25.1	26.2	26.2
All full-unit producers	26.2	25.9	24.3	24.7	24.4
	SG&A expense to net sales ratio (percent)				
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***	***	***	***	***	***
Top 12 full-unit producers	14.8	14.9	16.2	15.8	15.5
All other full-unit producers	16.9	16.7	17.7	17.2	17.6
All full-unit producers	15.2	15.2	16.5	16.1	15.9

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Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Operating income or (loss) to net sales ratio (percent)				
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Top 12 full-unit producers	11.5	11.1	7.8	8.5	8.5
All other full-unit producers	8.5	8.9	7.5	8.9	8.6
All full-unit producers	11.0	10.6	7.8	8.6	8.5
	Net income or (loss) to net sales ratio (percent)				
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Top 12 full-unit producers	8.9	8.4	5.2	6.3	5.2
All other full-unit producers	7.1	7.8	5.5	7.0	7.0
All full-unit producers	8.6	8.3	5.3	6.5	5.6

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Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Unit net sales value (dollars per unit)				
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Top 12 full-unit producers	175	179	186	187	184
All other full-unit producers	274	282	292	292	302
All full-unit producers	187	192	201	202	200
	Unit raw materials (dollars per unit)				
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Top 12 full-unit producers	67	68	72	71	71
All other full-unit producers	94	96	98	98	101
All full-unit producers	70	72	75	75	75

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Unit direct labor (dollars per unit)				
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***	***	***	***	***	***
Top 12 full-unit producers	20	21	22	22	21
All other full-unit producers	55	56	59	60	62
All full-unit producers	24	25	27	27	27
	Unit other factory costs (dollars per unit)				
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Top 12 full-unit producers	41	43	48	48	48
All other full-unit producers	56	59	62	58	60
All full-unit producers	43	45	50	50	49

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Unit COGS (dollars per unit)				
***	***	***	***	***	***
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Top 12 full-unit producers	129	132	141	141	140
All other full-unit producers	204	210	219	216	223
All full-unit producers	138	142	152	152	151
	Unit gross profit or (loss) (dollars per unit)				
***	***	***	***	***	***
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Top 12 full-unit producers	46	46	45	45	44
All other full-unit producers	70	72	73	76	79
All full-unit producers	49	50	49	50	49

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Unit SG&A expenses (dollars per unit)				
***	***	***	***	***	***
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Top 12 full-unit producers	26	27	30	30	29
All other full-unit producers	46	47	52	50	53
All full-unit producers	28	29	33	32	32
	Unit operating income or (loss) (dollars per unit)				
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
Top 12 full-unit producers	20	20	15	16	16
All other full-unit producers	23	25	22	26	26
All full-unit producers	21	20	16	17	17

Table continued on next page.

Table VI-5—Continued

WCVs: Results of full-unit operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Unit net income or (loss) (dollars per unit)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
Top 12 full-unit producers	16	15	10	12	10
All other full-unit producers	20	22	16	20	21
All full-unit producers	16	16	11	13	11

Note: ***.

Unit values of 0 represent values greater than 0 but less than 0.05. Unit values of (0) represent values less than 0 but greater than (0.05).

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

Table VI-6

WCVs: Results of merchant component operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Total net sales (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	458,153	475,193	478,103	368,506	353,147
	Cost of goods sold (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	375,086	396,026	405,099	310,985	302,615
	Gross profit or (loss) (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	83,067	79,167	73,004	57,521	50,532

Table continued on next page.

Table VI-6—Continued

WCVs: Results of merchant component operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	SG&A expenses (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	41,537	44,492	46,622	33,599	29,113
	Operating income or (loss) (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	41,530	34,675	26,382	23,922	21,419
	Net income or (loss) (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	9,691	(3,678)	9,250	15,059	10,611

Table continued on next page.

Table VI-6—Continued

WCVs: Results of merchant component operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	COGS to net sales ratio (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	81.9	83.3	84.7	84.4	85.7
	Gross profit or (loss) to net sales ratio (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	18.1	16.7	15.3	15.6	14.3
	SG&A expense to net sales ratio (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
All merchant component producers	9.1	9.4	9.8	9.1	8.2

Table continued on next page.

Table VI-6—Continued

WCVs: Results of merchant component operations of U.S. producers, by firm, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Operating income or (loss) to net sales ratio (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	9.1	7.3	5.5	6.5	6.1
	Net income or (loss) to net sales ratio (percent)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All merchant component producers	2.1	(0.8)	1.9	4.1	3.0

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

Net sales

The industry's combined net sales value increased from \$6.96 billion in 2016 to \$7.23 billion in 2018, and was higher in interim 2019 than in interim 2018. The net sales quantity for full units increased from 2016 to 2017, but decreased in 2018, for an overall decrease from 2016 to 2018. When comparing the interim periods, the net sales quantity of full units was higher in interim 2019 than in interim 2018. The net sales AUV for full units increased from \$187 per unit in 2016 to \$201 per unit in 2018, but was slightly lower in interim 2019 (at \$200 per unit) than during the same period in 2018 (at \$202 per unit). As seen in table VI-5, there was a wide range in full unit net sales AUVs among the producers. Of the largest producers, *** had the lowest range of net sales AUVs and *** had the highest. In response to questions from staff, ***.⁶ ***.⁷ Lastly, ***.⁸

⁶ Email from ***.

⁷ Email from ***.

⁸ Email from ***.

Cost of goods sold and gross profit or (loss)

Raw material costs, direct labor, and other factory costs for all WCVs accounted for 49.6, 18.2, and 32.2 percent of total COGS, respectively, in 2018. As a ratio to net sales, total COGS increased from 74.3 percent in 2016 to 76.3 percent in 2018, and was 75.9 percent in interim 2018 and 76.2 percent in interim 2019. On an actual basis, aggregate COGS increased by 6.7 percent from 2016 to 2018, while combined net sales value increased by 3.9 percent.⁹ As a result of the larger increase in COGS compared to revenue, gross profit declined by 4.1 percent overall from \$1.79 billion in 2016 to \$1.71 billion in 2018. Aggregate COGS was 0.7 percent higher in interim 2019 compared with interim 2018, whereas the total net sales value was 0.2 percent higher. This led to a lower gross profit in interim 2019 (\$1.29 billion) compared with interim 2018 (\$1.30 billion).

Like the net sales AUVs of full units, the COGS AUVs for full units varied noticeably between the companies (see table VI-5). The AUV of COGS for full units increased from \$138 per unit in 2016 to \$152 per unit in 2018, and was \$152 per unit in interim 2018 and \$151 per unit in interim 2019. Table VI-7 presents a break-out of the raw material costs, by type, for fiscal year 2018.

⁹ While all three components of COGS increased from 2016 to 2018, other factory costs accounted for the majority of the increase in total COGS. *** accounted for the largest share of the increase in other factory costs. In response to questions from staff, *** reported that its increase in other factory costs was attributable to ***. ***.

Table VI-7
WCVs: U.S. producers' raw materials, by type, 2018

Item	Fiscal year 2018		
	Full units and components	Full units	Components
	Value (1,000 dollars)		
Solid or natural wood	1,120,727	942,779	177,948
Engineered wood	691,807	669,829	21,978
Other	928,681	922,501	6,180
Raw materials	2,741,215	2,535,109	206,106
	Share of value (percent)		
Solid or natural wood	40.9	37.2	86.3
Engineered wood	25.2	26.4	10.7
Other	33.9	36.4	3.0
Raw materials	100.0	100.0	100.0
	Unit value (dollars per unit)		
Solid or natural wood	NA	28	NA
Engineered wood	NA	20	NA
Other	NA	27	NA
Raw materials	NA	75	NA

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

SG&A expenses and operating income

As seen in table VI-1, the industry's SG&A expenses increased by 12.8 percent between 2016 and 2018, from \$1.03 billion to \$1.16 billion, but were lower in interim 2019 than in interim 2018. ***. *** increase in SG&A expenses between 2016 and 2018. The company reported ***.¹⁰ As a ratio to net sales, SG&A expenses increased from 14.8 percent in 2016 to 16.0 percent in 2018, but were lower in interim 2019 (15.4 percent) than in interim 2018 (15.6 percent).

The industry's operating income decreased from \$756.5 million in 2016 to \$551.5 million in 2018, and was lower in interim 2019 (\$451.3 million) than in interim 2018 (\$456.1 million). The industry's operating margin decreased from 10.9 percent in 2016 to 7.6 percent in 2018, and was lower in interim 2019 than in interim 2018.

¹⁰ ***. MasterBrand's parent company, FBHS, described the 2019 asset impairment charges in its 2019 10-K as being "related to impairment of two indefinite-lived tradenames within our Cabinets segment, which were primarily the result of a continuing shift in consumer demand from custom and semi-custom cabinetry products to value-priced cabinetry products, which led to reductions in future growth rates related to these tradenames." The company described the 2018 asset impairment charges as being "related to impairment of two indefinite-lived tradenames within our Cabinets segment, which were primarily the result of changes in the mix of revenue across our tradenames finalized during our annual planning process conducted during the fourth quarter, as well as restructuring actions announced during the third quarter." Lastly, it described its 2018 restructuring charges as being "primarily related to costs associated with our initiatives to consolidate our manufacturing footprint and product lines in our Cabinets segment..." FBHS's 2019 Form 10-K p. 16 (as filed).

Other expenses and net income or (loss)

The industry's total interest expense increased irregularly from \$73.6 million in 2016 to \$74.7 million in 2018, and was higher in interim 2019 than in interim 2018. All other expenses decreased irregularly from \$113.6 million in 2016 to \$112.7 million in 2018, but was noticeably higher in interim 2019 than during interim 2018.¹¹ All other income increased irregularly from \$1.1 million in 2016 to \$2.8 million in 2018, and was higher in interim 2019 than during interim 2018.¹² Net income decreased from \$570.4 million in 2016 to \$366.9 million in 2018, and was lower in interim 2019 (\$293.4 million) than during interim 2018 (\$339.6 million).¹³

Capital expenditures and research and development expenses

Table VI-8 presents capital expenditures and research and development ("R&D") expenses, by firm. Aggregate capital expenditure data decreased from \$198.0 million in 2016 to \$190.9 million in 2018, and were lower in January-September 2019 than during the same period in 2018. *** accounted for the *** of capital expenditures during the annual year periods and in interim 2018.¹⁴ *** accounted for the largest company-specific amount in interim 2019.¹⁵ R&D expenses increased from \$16.4 million in 2016 to \$16.8 million in 2018, and were lower in interim 2019 than in interim 2018.

¹¹ ***.

¹² As seen in table VI-1, all other income is negative in 2017 and interim 2018. ***.

¹³ A variance analysis is not shown due to the large variety of product mixes and cost structures among the reporting firms.

¹⁴ *** U.S. producer questionnaire response, section III-13.

¹⁵ *** U.S. producer questionnaire responses, section III-13.

Table VI-8

WCVs: Capital expenditures and R&D expenses of U.S. producers, 2016-18, January-September 2018, and January-September 2019

Item	Fiscal year			January to September	
	2016	2017	2018	2018	2019
	Capital expenditures (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 U.S. producers	142,936	144,007	130,201	89,549	69,877
All other U.S. producers	55,098	55,843	60,709	46,032	32,787
All U.S. producers	198,034	199,850	190,910	135,581	102,664
	Research and development expenses (1,000 dollars)				
***	***	***	***	***	***
***	***	***	***	***	***
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***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Top 12 U.S. producers	***	***	***	***	***
All other U.S. producers	***	***	***	***	***
All U.S. producers	16,437	16,530	16,849	12,801	11,520

Note: ***.

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

Assets and return on assets

Table VI-9 presents data on the U.S. producers' total assets and their return on assets ("ROA").¹⁶ The total assets utilized in the production, warehousing, and sale of WCVs increased from \$3.9 billion in 2016 to \$4.9 billion in 2018, while the operating ROA decreased from 19.6 percent in 2016 to 11.1 percent in 2018. ***. American Woodmark recorded \$767.5 million of goodwill from the purchase of RSI, ***.¹⁷ ***.¹⁸

¹⁶ The return on assets ("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 for the subject product.

¹⁷ American Woodmark's 2018 Form 10-K, p. 30 and 38. American Woodmark also recorded a \$274 million intangible asset related to customer relationships from its acquisition of RSI in December 2017, ***. American Woodmark's 2018 Form 10-K, p. 30, 41-42. ***.

¹⁸ ***.

Table VI-9
WCVs: U.S. producers' total assets and return on assets, 2016-18

Firm	Fiscal years		
	2016	2017	2018
	Total net assets (1,000 dollars)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Top 12 U.S. producers	3,143,873	3,641,353	4,190,691
All other U.S. producers	716,632	746,430	757,679
All U.S. producers	3,860,505	4,387,783	4,948,370
	Operating return on assets (percent)		
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Top 12 U.S. producers	19.6	16.5	10.2
All other U.S. producers	19.5	19.6	16.6
All U.S. producers	19.6	17.0	11.1

Note: ***.

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

Capital and investment

The Commission requested U.S. producers of WCVs to describe any actual or potential negative effects of imports of WCVs from China on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-10 presents the number of firms reporting an impact in each category and table VI-11 provides the U.S. producers' narrative responses.¹⁹

Table VI-10

WCVs: Actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item	No	Yes
Negative effects on investment	9	40
Cancellation, postponement, or rejection of expansion projects		19
Denial or rejection of investment proposal		3
Reduction in the size of capital investments		21
Return on specific investments negatively impacted		13
Other		18
Negative effects on growth and development	11	38
Rejection of bank loans		1
Lowering of credit rating		1
Problem related to the issue of stocks or bonds		---
Ability to service debt		10
Other		28
Anticipated negative effects of imports	3	45

Note: *** did not provide a "yes" or "no" response to the question regarding anticipated negative effects of imports. ***.

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

¹⁹ As mentioned previously in this section, *** financial data are not included in the financial data in this section. However, the companies provided responses to the questions regarding actual and anticipated negative effects of imports of WCVs from China, which have been included in tables VI-10 and VI-11.

Table VI-11

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Cancellation, postponement, or rejection of expansion projects:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Cancellation, postponement, or rejection of expansion projects (continued):	
***	***
***	***
***	***
***	***
***	***
***	***
Denial or rejection of investment proposal:	
***	***
***	***
***	***
Reduction in the size of capital investments:	
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Reduction in the size of capital investments (continued):	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Return on specific investments negatively impacted:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Return on specific investments negatively impacted (continued):	
***	***
***	***
***	***
Other negative effects on investments:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Other negative effects on investments:	
***	***
***	***
***	***
***	***
***	***
Rejection of bank loans:	
***	***
Lowering of credit rating:	
***	***
Ability to service debt:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Other negative effects on growth and development:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Other negative effects on growth and development (continued):	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
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***	***

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Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Anticipated effects of imports:	
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
***	***
***	***
***	***
***	***

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Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Anticipated effects of imports (continued):	
***	***
***	***
***	***
***	***
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Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Anticipated effects of imports (continued):	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table VI-11—Continued

WCVs: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2016

Item / Firm	Narrative
Anticipated effects of imports (continued):	
***	***
***	***
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) *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,*
- (VII) *in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) *the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) *any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 110 firms believed to produce and/or export the subject merchandise from China.³ Usable responses to the Commission's questionnaire were received from 92 firms. In 2018, these firms' exports to the United States accounted for a majority of U.S. imports of full-unit WCVs and components from China under HTS statistical reporting number 9403.40.9060, by value.⁴ Table VII-1 presents information on the WCV operations of the responding producers and exporters in China and table VII-2 presents information on the operations of responding component producers in China.

³ These firms were identified through a review of information submitted in the petitions and contained in *** records.

⁴ Quantity data for the various components that are subject to these investigations cannot be reliably collected with a single unit of measurement. Consequently, the Commission only collected value data for Chinese producers' exports of components. Due to these factors, the share of U.S. imports that were accounted by the responding exporters in China was calculated based on value.

Table VII-1
WCVs: Summary data for full-unit WCVs producers in China, 2018

Firm	Production (units)	Share of reported production (percent)	Exports to the United States (units)	Share of reported exports to the United States (percent)	Total shipments (units)	Share of firm's total shipments exported to the United States (percent)
Adler Cabinetry	***	***	***	***	***	***
Adornus Cabinetry	***	***	***	***	***	***
Aershin Cabinets	***	***	***	***	***	***
Amazing Furniture	***	***	***	***	***	***
Ancientree Cabinet	***	***	***	***	***	***
Baiyulan Furniture	***	***	***	***	***	***
Baoli Wood	***	***	***	***	***	***
Baozhu Furniture	***	***	***	***	***	***
Beichen Wood	***	***	***	***	***	***
Bonn Flooring	***	***	***	***	***	***
Changfa Wood	***	***	***	***	***	***
Dewell Wooden Products	***	***	***	***	***	***
Foremost Woodwork	***	***	***	***	***	***
Fusheng Wood	***	***	***	***	***	***
Fushi Wood	***	***	***	***	***	***
Fuxing Wood	***	***	***	***	***	***
Goldenhome	***	***	***	***	***	***
Haiyan Household	***	***	***	***	***	***
Hanlong Furniture	***	***	***	***	***	***
Heyond Cabinet	***	***	***	***	***	***
Home Dee Sanitary	***	***	***	***	***	***
Hongtai Home Furniture	***	***	***	***	***	***
Hongxinchengda Wood	***	***	***	***	***	***
Hongzhou Cabinet	***	***	***	***	***	***
Hongzhou Wood	***	***	***	***	***	***
Honsoar Building Material	***	***	***	***	***	***
Huamei Industrial	***	***	***	***	***	***
Huanmei Wood	***	***	***	***	***	***
Jiamu Industry	***	***	***	***	***	***
Jianlian Wood Products	***	***	***	***	***	***
Jiaxiu Wood	***	***	***	***	***	***
Jiaye Wood	***	***	***	***	***	***
Jinxiangyuan Home	***	***	***	***	***	***
Jujia Furniture	***	***	***	***	***	***
Kaipu Furniture	***	***	***	***	***	***
Kaylang	***	***	***	***	***	***
Kunlun Wood	***	***	***	***	***	***
Lan Gu Wood	***	***	***	***	***	***

Table continued on next page.

Table VII-1—Continued
WCVs: Summary data for full-unit WCVs producers in China, 2018

Firm	Production (units)	Share of reported production (percent)	Exports to the United States (units)	Share of reported exports to the United States (percent)	Total shipments (units)	Share of firm's total shipments exported to the United States (percent)
Leifeng Cabinetry	***	***	***	***	***	***
Longsen Woods	***	***	***	***	***	***
Mebo	***	***	***	***	***	***
Meisen Woodworking	***	***	***	***	***	***
Minlian Wood	***	***	***	***	***	***
Morewood Cabinetry	***	***	***	***	***	***
Oulu Jin Xin International Trade	***	***	***	***	***	***
Panda Home	***	***	***	***	***	***
Pengjia Cabinetry	***	***	***	***	***	***
Roc Furniture	***	***	***	***	***	***
Runkang Cabinet	***	***	***	***	***	***
Sanfortune Home and Furniture	***	***	***	***	***	***
Sangyang Wood	***	***	***	***	***	***
Senyi Kitchen Cabinet	***	***	***	***	***	***
Shousheng	***	***	***	***	***	***
Su Rongxin Cabinets	***	***	***	***	***	***
Sunco Timber	***	***	***	***	***	***
Sunwell Cabinetry	***	***	***	***	***	***
Supree Wood	***	***	***	***	***	***
Swanch Cabinetry	***	***	***	***	***	***
Tonghe Woodwork	***	***	***	***	***	***
Weifang Kitchinet	***	***	***	***	***	***
Weisen Houseware	***	***	***	***	***	***
Xingsen Wooden Products	***	***	***	***	***	***
Xinyu Furniture	***	***	***	***	***	***
Xinyuanda Cupboard	***	***	***	***	***	***
Yihe Wood	***	***	***	***	***	***
Yimei Woodwork	***	***	***	***	***	***
Yuanlin Woodenware	***	***	***	***	***	***
Zbom Home	***	***	***	***	***	***
Zhengheng Woodwork	***	***	***	***	***	***
Total	19,450,618	100.0	14,956,686	100.0	19,395,386	77.1

Note: Shares and ratios shown as "0.0" represent values greater than zero but less than "0.05" percent. These data are presented in quantity because it presents each firm's share of total production in China, which was collected only on a quantity basis.

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

Table VII-2

WCVs: Summary data for component producers in China exporting to the United States, 2018

Firm	Value of components exported to the United States (1,000 dollars)	Share of components exported to the United States (percent)
Adornus Cabinetry	***	***
Aiwood Home	***	***
Baoli Wood	***	***
Baozhu Furniture	***	***
Dewell Wooden Products	***	***
Dongmeng Wood	***	***
Foremost Woodwork	***	***
Fushi Wood	***	***
Goldenhome	***	***
Haiyan Household	***	***
Hanlong Furniture	***	***
Heyond Cabinet	***	***
Home Right	***	***
Hongxinchengda Wood	***	***
Hongzhou Cabinet	***	***
Kunlun Wood	***	***
Longsen Woods	***	***
Master	***	***
Master Wood Industry	***	***
Meilin Wood	***	***
Morewood Cabinetry	***	***
Northriver	***	***
Oulu Jin Xin International Trade	***	***
Runkang Cabinet	***	***
Senke	***	***
Senyi Kitchen Cabinet	***	***
Sheen Lead	***	***
Shousheng	***	***
Supree Wood	***	***
Weifang Kitchinet	***	***
Weisen Houseware	***	***
Xingsen Wooden Products	***	***
Xinyu Furniture	***	***
Xinyuanda Cupboard	***	***
Yihe Wood	***	***
Yimei Woodwork	***	***
Yuanlin Woodenware	***	***
Total	73,334	100.0

Note: Shares and ratios shown as "0.0" represent values greater than zero but less than "0.05" percent.

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

Table VII-3 presents information on firms in China that exported resales of WCVs to the United States in 2018.⁵ The three largest resale exporters of WCVs to the United States in 2018 were ***. These firms accounted for *** percent of resale exports from China to the United States by responding firms in 2018.

Table VII-3
WCVs: Summary data for resellers in China exporting to the United States, 2018

Firm	Resales exported to the United States (units)	Share of resales exported to the United States (percent)
Aiwood Home	***	***
CBM	***	***
Dongmeng Wood	***	***
Golden Ferry	***	***
Home Right	***	***
Hongxiang Trading	***	***
Honsoar Building Material	***	***
Hua Yin Trading	***	***
Jie Jun Trade	***	***
Line King	***	***
Mastone	***	***
Northriver	***	***
Sagarit Bathroom	***	***
SAICG	***	***
Senke	***	***
Shanghai Timber	***	***
Sheen Lead	***	***
Sourcever	***	***
Sunwell Cabinetry	***	***
Taiyuan Trading	***	***
Wen Bo	***	***
Zifeng	***	***
Total	4,028,644	100.0

Note: Shares and ratios shown as “0.0” represent values greater than zero but less than “0.05” percent.

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

⁵ These firms did not produce WCVs in China but rather purchased WCVs from other producers in China and exported those products to the United States.

Changes in operations

As presented in table VII-4, producers in China reported several operational and organizational changes since January 1, 2016.

Table VII-4
WCVs: Reported changes in operations by producers in China, since January 1, 2016

Item / Firm	Reported changed in operations
Plant openings:	
***	***
***	***
***	***
***	***
***	***
***	***
Plant closings:	
***	***
***	***
Relocations:	
***	***
***	***
***	***
***	***
Expansions:	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
Prolonged shutdowns or curtailments:	
***	***
***	***
Other:	
***	***
***	***
***	***
***	***

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

Six firms reported plant openings, two firms reported plant closings, four firms reported relocations, seven firms reported expansions, two firms reported prolong shutdowns or curtailments, and four firms reported other changes in operations.

Operations in China

Table VII-5 presents information on the WCV operations of the responding producers and exporters in China.⁶ Annual production capacity for all responding producers of WCVs in China increased by 33.4 percent from 2016 to 2018 and was 2.7 percent lower in interim 2019 than in interim 2018. Sixty-nine firms reported production capacity in at least one year during 2016-18. Fifty-four firms reported production capacity in each year during 2016-18; seven reported production capacity beginning in 2017, and eight reported production capacity beginning in 2018.⁷ Among the 54 firms that reported production capacity of WCVs in each year during 2016-18, 14 reported more capacity in 2018 than in 2016 while 40 reported no change in their production capacity. Sixty-seven firms reported production capacity in both interim periods, with 55 firms reporting the same level of production capacity in interim 2018 and interim 2019. Annual production capacity for all responding producers in China was projected to be 1.8 percent lower in 2019 than in 2018 and 6.6 percent lower in 2020 than in 2019.

⁶ As discussed previously in this Part, quantity data for the various components that are subject to these investigations cannot be reliably collected with a single unit of measurement. Consequently, table VII-5 presents production and shipment data for only full-unit WCVs.

⁷ The seven producers in China that reported production capacity beginning in 2017 had a capacity of *** units in 2017, equivalent to *** percent of the total increase in production capacity from 2016 to 2017. The eight producers in China that reported production capacity beginning in 2018 had a capacity of *** units, equivalent to *** percent of the total increase in production capacity from 2017 to 2018.

Table VII-5

WCVs: Data on the industry in China, 2016-18, January to September 2018 and January to September 2019, and projected calendar years 2019 and 2020

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Quantity (units)						
Capacity	19,460,230	22,219,280	25,950,930	19,689,612	19,161,987	25,480,830	23,807,430
Production	10,789,520	14,976,556	19,450,618	14,303,473	13,242,643	17,222,260	14,315,162
End-of-period inventories	281,083	382,411	438,373	338,830	554,912	545,243	420,664
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	2,036,437	2,782,568	3,802,696	2,775,386	3,103,714	4,318,730	4,821,642
Export shipments to:							
United States	8,281,448	11,542,621	14,956,686	11,155,286	9,063,121	11,106,469	6,587,041
All other markets	355,584	550,639	636,004	402,815	936,885	1,675,509	3,056,970
Total exports	8,637,032	12,093,260	15,592,690	11,558,101	10,000,006	12,781,978	9,644,011
Total shipments	10,673,469	14,875,828	19,395,386	14,333,487	13,103,720	17,100,708	14,465,653
	Value (1,000 dollars)						
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	277,632	294,488	272,800	204,488	234,343	315,102	373,474
Export shipments to:							
United States	470,108	650,373	856,686	633,729	511,950	624,287	385,236
All other markets	26,790	35,785	39,911	28,398	47,814	92,551	167,707
Total exports	496,898	686,158	896,597	662,127	559,764	716,838	552,943
Total shipments	774,530	980,646	1,169,397	866,615	794,107	1,031,940	926,417
	Unit value (dollars per unit)						
Shipments:							
Home market shipments:							
Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	136	106	72	74	76	73	77
Export shipments to:							
United States	57	56	57	57	56	56	58
All other markets	75	65	63	70	51	55	55
Total exports	58	57	58	57	56	56	57
Total shipments	73	66	60	60	61	60	64

Table continued on next page.

Table VII-5—Continued

WCVs: Data on the industry in China, 2016-18, January to September 2018 and January to September 2019, and projected calendar years 2019 and 2020

Item	Actual experience					Projections	
	Calendar year			January-September		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Ratios and shares of quantity (percent)						
Capacity utilization	55.4	67.4	75.0	72.6	69.1	67.6	60.1
Inventories/production	2.6	2.6	2.3	1.8	3.1	3.2	2.9
Inventories/total shipments	2.6	2.6	2.3	1.8	3.2	3.2	2.9
Share of shipments: Home market shipments: Internal consumption/ transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	19.1	18.7	19.6	19.4	23.7	25.3	33.3
Export shipments to: United States	77.6	77.6	77.1	77.8	69.2	64.9	45.5
All other markets	3.3	3.7	3.3	2.8	7.1	9.8	21.1
Total exports	80.9	81.3	80.4	80.6	76.3	74.7	66.7
Total shipments	100.0	100.0	100.0	100.0	100.0	100.0	100.0
	Quantity (units)						
Resales exported to the United States	2,424,905	3,162,772	4,028,644	2,888,542	1,953,770	2,961,945	2,468,867
Adjusted total exports to the U.S.	10,706,353	14,705,393	18,985,330	14,043,828	11,016,891	14,068,414	9,055,908
	Ratio and shares (percent)						
Share of total exports to the United States: Exported by producers	77.4	78.5	78.8	79.4	82.3	78.9	72.7
Exported by resellers	22.6	21.5	21.2	20.6	17.7	21.1	27.3
Adjusted share of total shipments exported to the United States	100.3	98.9	97.9	98.0	84.1	82.3	62.6

Note: Shares and ratios shown as "0.0" represent values greater than zero but less than "0.05" percent.

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

Production of WCVs by producers in China increased by 80.3 percent from 2016 to 2018 and was 7.4 percent lower in interim 2019 than in interim 2018. Sixty-nine firms reported production of WCVs in China in at least one year during 2016-18. Fifty-four firms produced WCVs in each year during 2016-18; seven firms began production of WCVs in 2017, and eight firms began production of WCVs in 2018.⁸ Among the 54 firms that reported production in each year during 2016-18, 46 reported higher production in 2018 than in 2016. Forty of the 65 firms that produced WCVs in interim 2018 and interim 2019 reported lower production in interim 2019 than in interim 2018. Production was projected to be 11.5 percent lower in 2019 than in 2018 and 16.9 percent lower in 2020 than in 2019.

The average capacity utilization for all responding producers in China increased from 55.4 percent in 2016 to 67.4 percent in 2017, and to 75.0 percent in 2018. Their average capacity utilization was 69.1 percent in interim 2019, compared with 72.6 percent in interim 2018. Among the 54 firms that reported production of WCVs in each year during 2016-18, 42 firms reported higher capacity utilization in 2018 than in 2016. Thirty-nine out of 65 firms that produced WCVs in both interim periods reported lower capacity utilization in interim 2019 than in interim 2018. Capacity utilization for responding producers in China was projected to be 67.6 percent in 2019 and 60.1 percent in 2020.

Home market shipments by responding producers in China increased by 86.7 percent from 2016 to 2018 and were 11.8 percent higher in interim 2019 than in interim 2018. Twenty-nine firms reported home market shipments in at least one year during 2016-18. Eighteen firms reported home market shipments in each year during 2016-18; four firms began reporting home market shipments in 2017; and five firms began reporting home market shipments in 2018.⁹ Additionally, one firm ceased home market shipments in 2018 and one firm reported such shipments only in 2017. Among the 18 firms that reported home market shipments in each year during 2016-18, 14 reported a greater quantity of shipments in 2018 than in 2016. Twenty-three firms reported home market shipments in interim 2018 and interim 2019, with 16

⁸ The seven producers in China that began producing full-unit WCVs in 2017 collectively produced *** units in 2017, equivalent to *** percent of the total increase in production from 2016 to 2017. The eight producers in China that began producing full-unit WCVs in 2018 collectively produced *** units in 2018, equivalent to *** percent of the total increase in production from 2017 to 2018. No responding firm ceased production during 2016-18.

⁹ The four firms that began reporting home market shipments in 2017 collectively shipped *** units in 2017, equivalent to *** percent of the total increase in the quantity of home market shipments from 2016 to 2017. The five firms that began reporting home market shipments in 2018 collectively shipped *** units in 2018, equivalent to *** percent of the total increase in the quantity of home market shipments from 2017 to 2018.

of those firms reporting more shipments in interim 2019 than in interim 2018. Although home market shipments increased in absolute terms, its share of total shipments remained relatively constant throughout 2016-18. Home market shipments were projected to be 13.6 percent higher in 2019 than in 2018 and 11.6 percent higher in 2020 than in 2019.

During 2016-18, export shipments accounted for the majority of total shipments by responding producers in China, with the vast majority going to the United States (over 95 percent in each year during 2016-18). Export shipments to the United States increased by 80.6 percent from 2016 to 2018 and were 18.8 percent lower in interim 2019 than in interim 2018. Sixty-eight firms exported WCVs to the United States in at least one year during 2016-18. Forty-eight firms exported WCVs to the United States in each year during 2016-18; 8 began exporting WCVs to the United States in 2017; and 12 began exporting WCVs to the United States beginning in 2018.¹⁰ Among the 48 firms that exported WCVs to the United States in each year during 2016-18, 42 reported a greater quantity of exports to the United States in 2018 than in 2016. Sixty-four firms exported WCVs to the United States in interim 2018 and interim 2019, with 44 reporting a lower quantity of exports in interim 2019 than in interim 2018. Exports to the United States by responding producers in China were projected to be 25.7 percent lower in 2019 than in 2018 and 40.7 percent lower in 2020 than in 2019.

Exports of resales accounted for 22.6 percent, 21.5 percent, and 21.2 percent of all exports to the United States in 2016, 2017, and 2018, respectively. They accounted for 17.7 percent of all exports to the United States in interim 2019, compared with 20.6 percent in interim 2018. Exports of resales of WCVs to the United States increased by 66.1 percent from 2016 to 2018 and were 32.4 percent lower in interim 2019 than in interim 2018. Twenty-two firms exported resales of WCVs to the United States in at least one year during 2016-18. Sixteen firms exported resales of WCVs to the United States in each year during 2016-18; three firms began exporting resales of WCVs to the United States in 2017; and three firms began exporting resales of WCVs to the United States in 2018. Exports of resales to the United States were projected to be 26.5 percent lower in 2019 than in 2018 and 16.6 percent lower in 2020 than in 2019.

¹⁰ The eight firms that began exporting WCVs to the United States in 2017 collectively exported *** units in 2017, equivalent to *** percent of the total increase in the quantity of export shipments to the United States from 2016 to 2017. The 12 firms that began exporting WCVs to the United States in 2018 collectively exported *** units, equivalent to *** percent of the total increase in the quantity of export shipments to the United States from 2017 to 2018.

Exports of components to the United States

Table VII-6 presents exports of components to the United States by producers in China.¹¹

Table VII-6
WCVs: Exports of components to the United States by producers in China, 2016-18, January to September 2019, and January to September 2019

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2016	2017	2018	2018	2019	2019	2020
	Value (1,000 dollars)						
Exports to the United States.-- Frames	8,691	8,177	7,910	5,375	3,088	5,469	5,872
Boxes	***	***	***	***	***	***	***
Doors	16,825	17,872	28,205	18,411	16,425	22,775	13,877
Drawers	6,659	10,471	10,556	7,995	6,300	9,188	7,102
Back and end panels	***	***	***	***	***	***	***
Other	17,562	24,244	18,758	13,791	10,495	15,229	13,492
Components	52,445	64,548	73,334	50,334	38,490	55,204	42,371
	Share of component exports to the United States (percent)						
Exports to the United States.-- Frames	16.6	12.7	10.8	10.7	8.0	9.9	13.9
Boxes	***	***	***	***	***	***	***
Doors	32.1	27.7	38.5	36.6	42.7	41.3	32.8
Drawers	12.7	16.2	14.4	15.9	16.4	16.6	16.8
Back and end panels	***	***	***	***	***	***	***
Other	33.5	37.6	25.6	27.4	27.3	27.6	31.8
Components	100.0	100.0	100.0	100.0	100.0	100.0	100.0

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

The value of exports of components to the United States increased by 39.8 percent from 2016 to 2018. Thirty-seven firms exported components to the United States in at least one year during 2016-18. By value, doors accounted for the *** of total exports of components to the United States in 2018 and interim 2019 while other components accounted for the *** in 2016 and 2017. The values of exports of boxes, doors, drawers, back and end panels, and other components were higher in 2018 than in 2016 while the value of exports of frames was lower. The value of exports of components to the United States was 23.5

¹¹ Quantity data for the various WCVs components that are subject to these investigations cannot be reliability collected with any single unit of measurement. Consequently, the Commission only collected value data for exports of components to the United States.

percent lower in interim 2019 than in interim 2018. It was projected to be 24.7 percent lower in 2019 than in 2018 and 23.2 percent lower in 2020 than in 2019.

Exports of wooden furniture

Table VII-7 presents data for exports of wooden furniture from China, which includes WCVs, in descending order of value for 2018.¹² The leading export markets for wooden furniture from China in 2018, by value, were the United States, the United Kingdom, and Australia, accounting for 47.8 percent, 4.5 percent, and 4.3 percent, respectively.

Table VII-7
Wooden furniture: Exports from China by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Value (1,000 dollars)		
United States	3,293,164	3,840,291	4,391,096
United Kingdom	394,698	396,741	410,891
Australia	325,539	375,887	395,949
Japan	378,206	378,973	390,755
Hong Kong	462,936	514,036	355,978
Canada	244,099	262,252	260,731
Germany	269,278	267,490	250,683
France	211,756	201,694	216,855
Singapore	330,134	148,507	187,377
All other destination markets	2,207,912	2,117,092	2,329,236
Total exports	8,117,721	8,502,962	9,189,551
	Quantity (units)		
United States	68,323,708	80,852,681	91,320,302
United Kingdom	11,091,113	13,304,389	12,025,683
Australia	7,931,170	8,969,393	10,052,143
Japan	13,497,527	15,529,233	14,804,502
Hong Kong	4,453,078	4,340,641	3,046,236
Canada	4,909,642	5,473,460	5,612,484
Germany	10,781,606	10,739,080	10,436,088
France	6,781,062	7,438,007	8,656,395
Singapore	2,061,577	1,297,102	1,374,821
All other destination markets	48,921,762	52,374,473	57,905,432
Total exports	178,752,245	200,318,459	215,234,086

Table continued on next page.

¹² GTA data for HTS subheadings 9403.40 and 9403.60 includes products that are outside the scope of these investigations. Consequently, the Chinese export data presented in table VII-7 are overstated.

Table VII-7—Continued
Wooden furniture: Exports from China by destination market, 2016-18

Destination market	Calendar year		
	2016	2017	2018
	Unit value (dollars per unit)		
United States	48	47	48
United Kingdom	36	30	34
Australia	41	42	39
Japan	28	24	26
Hong Kong	104	118	117
Canada	50	48	46
Germany	25	25	24
France	31	27	25
Singapore	160	114	136
All other destination markets	45	40	40
Total exports	45	42	43
	Share of value (percent)		
United States	40.6	45.2	47.8
United Kingdom	4.9	4.7	4.5
Australia	4.0	4.4	4.3
Japan	4.7	4.5	4.3
Hong Kong	5.7	6.0	3.9
Canada	3.0	3.1	2.8
Germany	3.3	3.1	2.7
France	2.6	2.4	2.4
Singapore	4.1	1.7	2.0
All other destination markets	27.2	24.9	25.3
Total exports	100.0	100.0	100.0
	Share of quantity (percent)		
United States	38.2	40.4	42.4
United Kingdom	6.2	6.6	5.6
Australia	4.4	4.5	4.7
Japan	7.6	7.8	6.9
Hong Kong	2.5	2.2	1.4
Canada	2.7	2.7	2.6
Germany	6.0	5.4	4.8
France	3.8	3.7	4.0
Singapore	1.2	0.6	0.6
All other destination markets	27.4	26.1	26.9
Total exports	100.0	100.0	100.0

Note: United States is shown at the top. All remaining top export destinations are shown in descending order of 2018 data.

Source: Official export statistics under HS subheadings 9403.40 and 9403.60 as reported by China customs in the Global Trade Atlas database, accessed December 10, 2019.

U.S. inventories of imported merchandise

Table VII-8 presents data for U.S. importers' reported inventories of WCVs. The value of U.S. importers' end-of-period inventories of imports of full-unit WCVs from China increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. The value of U.S. importers' end-of-period inventories of imports of components from China increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. Collectively, the value of U.S. importers' end-of-period inventories of imports of full-unit WCVs and components from China increased by 41.8 percent from 2016 to 2018 and was 11.8 percent higher in interim 2019 than in interim 2018.

Responding U.S. importers' end-of-period inventories of imports of full-unit WCVs from China, by quantity, increased by 30.9 percent from 2016 to 2018.¹³ Among the 61 firms that held inventories at the end of each year during 2016-18, 43 reported more inventories at the end of 2018 than at the end of 2016. The quantity of U.S. importers' end-of-period inventories of imports of full unit WCVs from China was 9.8 percent higher in interim 2019 than in interim 2018.¹⁴ Sixty-five firms held inventory at the end of both interim periods, with 34 firms reporting more inventories at the end of interim 2019 than at the end of interim 2018.

¹³ The quantity of U.S. importers' end-of-period inventories of full-unit WCVs is overstated in 2016. This discrepancy is largely due to ***. ***. ***. Email from ***, December 18, 2019.

¹⁴ End-of-period inventories are understated in interim 2019, which is largely due to ***. Ibid.

Table VII-8

WCVs: U.S. importers' end-of-period inventories of imports by source, 2016-18, January-September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Ending inventories: China.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	265,130	299,164	376,001	340,186	380,220
	Ratio (percent)				
Ratio of inventories to imports: China.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	46.8	44.2	44.5	56.0	70.2
Ratio of inventories to U.S. shipments: China.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
Ratio of inventories to total shipments: China.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	30.4	29.4	30.5	38.1	42.2
	Quantity (full units)				
Ending inventories: China.— Full units	3,736,881	3,912,426	4,893,286	4,565,364	5,012,301
	Ratio (percent)				
Ratio of inventories to imports: China.— Full units	51.8	46.2	47.1	43.9	49.6
Ratio of inventories to U.S. shipments: China.— Full units	57.2	47.7	49.8	47.5	53.1
Ratio of inventories to total shipments: China.— Full units	57.0	47.5	49.7	47.4	53.0

Table continued on next page.

Table VII-8—Continued

WCVs: U.S. importers' end-of-period inventories of imports by source, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Ending inventories: Nonsubject sources.—					
Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
	Ratio (percent)				
Ratio of inventories to imports: Nonsubject sources.—					
Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
Ratio of inventories to U.S. shipments: Nonsubject sources.—					
Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
Ratio of inventories to total shipments: Nonsubject sources.—					
Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
	Quantity (full units)				
Ending inventories: Nonsubject sources.—					
Full units	***	***	***	***	***
	Ratio (percent)				
Ratio of inventories to imports: Nonsubject sources.—					
Full units	***	***	***	***	***
Ratio of inventories to U.S. shipments: Nonsubject sources.—					
Full units	***	***	***	***	***
Ratio of inventories to total shipments: Nonsubject sources.—					
Full units	***	***	***	***	***

Table continued on next page.

Table VII-8—Continued

WCVs: U.S. importers' end-of-period inventories of imports by source, 2016-18, January-September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
Ending inventories: All import sources.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
	Ratio (percent)				
Ratio of inventories to imports: All import sources.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
Ratio of inventories to U.S. shipments: All import sources.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
Ratio of inventories to total shipments: All import sources.— Full units	***	***	***	***	***
Components	***	***	***	***	***
Both full units and components	***	***	***	***	***
	Quantity (full units)				
Ending inventories: All import sources.— Full units	***	***	***	***	***
	Ratio (percent)				
Ratio of inventories to imports: All import sources.— Full units	***	***	***	***	***
Ratio of inventories to U.S. shipments: All import sources.— Full units	***	***	***	***	***
Ratio of inventories to total shipments: All import sources.— Full units	***	***	***	***	***

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

Fluctuating year to year, the value of U.S. importers' end-of-period inventories of imports of full-unit WCVs from nonsubject sources decreased by *** percent from 2016 to 2017 and then increased by *** percent from 2017 to 2018, ending *** percent higher in 2018 than in 2016. It was *** greater in interim 2019 than in interim 2018. The difference between the two interim periods can be attributed to ***, whose inventories, by value, were *** greater at the end of interim 2019 than at the end of interim 2018. The value of U.S. importers' end-of-period inventories of imports of components from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018. Collectively, the value of U.S. importers' end-of-period inventories of imports of full-unit WCVs and components from nonsubject sources increased by *** percent from 2016 to 2018 and was *** percent higher in interim 2019 than in interim 2018.

After increasing by *** percent from 2016 to 2017, the quantity of U.S. importers' end-of-period inventories of imports of full-unit WCVs from nonsubject sources decreased by *** percent from 2017 to 2018, ending *** percent lower in 2018 than in 2016. *** accounted for the majority of inventories at the end of each year (**% percent in 2016, **% percent in 2017, and **% percent in 2018). The quantity of U.S. importers' end-of-period inventories of imports of full-unit WCVs from nonsubject sources was *** greater in interim 2019 than in interim 2018.

According to Respondent ACCI, U.S. importers are more inventory-focused because their businesses depend on an ability to quickly ship products to customers.¹⁵ ACCI noted that if its members are unable to inventory their product in the form of RTA flat packs, they would not be able to ensure that customers can quickly receive their orders.¹⁶ During the staff conference, representatives from JSI Cabinetry and Kitchen Cabinet Distributors testified that U.S. importers' inventories can be relatively high because it is difficult to accurately anticipate demand for any cabinet configuration, and because of long and volatile lead times to replenish supply from China.¹⁷ Lead times can range from 90 to 150 days.¹⁸

¹⁵ Respondent ACCI's postconference brief, answers to staff's questions, p. A-20.

¹⁶ Ibid., pp. A-20-21.

¹⁷ Conference transcript pp. 169-170 (Graff) (Goldman) and Respondent ACCI's postconference brief, answers to staff's questions, p. A-21.

¹⁸ Ibid.

U.S. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of WCVs from China after September 30, 2019. Imports from nonsubject sources accounted for the majority of arranged imports, by value, in each period for which data were collected (***) percent in October-December 2019, (***) percent in January-March 2020, (***) percent in April-June 2020, and (***) percent in July-September 2020). Table VII-9 presents data for the value of WCVs arranged for U.S. importation after September 30, 2019.

Table VII-9
WCVs: Arranged imports, October 2019 through September 2020

Item	Period				
	Oct-Dec 2019	Jan-Mar 2020	Apr-Jun 2020	Jul-Sep 2020	Total
	Value (1,000 dollars)				
Arranged U.S. imports from.—					
China	***	***	***	***	***
All other sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Antidumping or countervailing duty orders in third-country markets

There are no known trade remedy actions on WCVs in third-country markets. Counsel for the petitioner stated that it is not aware of any antidumping or countervailing duty orders in place on WCVs imports from China in any third country markets.¹⁹

Information on nonsubject countries

The value of global exports of wooden furniture, which includes WCVs, increased by 5.1 percent from 2016 to 2018. By value, China was the largest global exporter of wooden furniture in 2018, accounting for 28.8 percent of global exports. Germany and Italy were the second largest and third largest exporters of wooden furniture in 2018, accounting for 11.8 percent and 9.9 percent of global exports, respectively. Table VII-10 presents global export data for wooden furniture.²⁰

¹⁹ Petition, p. 4 and Petitioner's postconference brief, p. 33.

²⁰ GTA data for HTS subheadings 9403.40 and 9403.60 includes merchandise that are outside the scope of these investigations. Consequently, the global export data presented in Table VII-10 are overstated.

Table VII-10
Wooden furniture: Global exports by exporter, 2016-18

Exporter	Calendar year		
	2016	2017	2018
	Value (1,000 dollars)		
United States	731,220	696,616	689,937
China	8,117,721	8,502,962	9,189,551
Germany	3,463,356	3,529,665	3,756,385
Italy	2,853,645	2,863,438	3,157,109
Poland	2,140,371	2,415,654	2,620,798
Indonesia	781,951	806,484	801,594
Malaysia	756,014	746,075	790,393
Denmark	702,407	707,908	766,337
Canada	721,313	728,778	740,400
Spain	707,843	712,664	722,927
France	557,492	581,284	612,158
Lithuania	519,642	541,285	608,166
All other exporters	8,336,661	8,870,442	7,489,291
Total	30,389,636	31,703,255	31,945,046
	Share of value (percent)		
United States	2.4	2.2	2.2
China	26.7	26.8	28.8
Germany	11.4	11.1	11.8
Italy	9.4	9.0	9.9
Poland	7.0	7.6	8.2
Indonesia	2.6	2.5	2.5
Malaysia	2.5	2.4	2.5
Denmark	2.3	2.2	2.4
Canada	2.4	2.3	2.3
Spain	2.3	2.2	2.3
France	1.8	1.8	1.9
Lithuania	1.7	1.7	1.9
All other exporters	27.4	28.0	23.4
Total	100.0	100.0	100.0

Source: Official export statistics under HS subheadings 9403.40 and 9403.60 reported by various national statistical authorities in the GTA database, accessed December 10, 2019.

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
84 FR 8890 March 12, 2019	<i>Wooden Cabinets and Vanities From China; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2019-03-12/pdf/2019-04474.pdf
84 FR 12581 April 2, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Initiation of Countervailing Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2019-04-02/pdf/2019-06387.pdf
84 FR 12587 April 2, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Initiation of Less-Than-Fair-Value Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2019-04-02/pdf/2019-06388.pdf
84 FR 17890 April 26, 2019	<i>Wooden Cabinets and Vanities from China</i>	https://www.govinfo.gov/content/pkg/FR-2019-04-26/pdf/2019-08386.pdf
84 FR 39798 August 12, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination, and Alignment of Final Determination With Final Antidumping Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2019-08-12/pdf/2019-17198.pdf

Citation	Title	Link
84 FR 54106 October 9, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures</i>	https://www.govinfo.gov/content/pkg/FR-2019-10-09/pdf/2019-21998.pdf
84 FR 56420 October 22, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination and Extension of Provisional Measures (Corrections)</i>	https://www.govinfo.gov/content/pkg/FR-2019-10-22/pdf/C1-2019-21998.pdf
84 FR 57050 October 24, 2019	<i>Wooden Cabinets and Vanities From China; Scheduling of the Final Phase of Countervailing Duty and Anti-Dumping Duty Investigations</i>	https://www.govinfo.gov/content/pkg/FR-2019-10-24/pdf/2019-23224.pdf
84 FR 61875 November 14, 2019	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Amended Preliminary Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2019-11-14/pdf/2019-24732.pdf

Citation	Title	Link
85 FR 11953 February 28, 2020	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value</i>	https://www.govinfo.gov/content/pkg/FR-2020-02-28/pdf/2020-04121.pdf
85 FR 11962 February 28, 2020	<i>Wooden Cabinets and Vanities and Components Thereof From the People's Republic of China: Final Affirmative Countervailing Duty Determination</i>	https://www.govinfo.gov/content/pkg/FR-2020-02-28/pdf/2020-04120.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: Wooden Cabinets and Vanities from China
Inv. Nos.: 701-TA-620 and 731-TA-1445 (Final)
Date and Time: February 20, 2020 - 9:30 a.m.

Sessions were held in connection with these investigations in the Main Hearing Room (Room 101), 500 E Street, SW., Washington, DC.

STATE GOVERNMENT APPEARANCE:

The Honorable Larry J. Fetner, Mayor of the City of Ashland, Alabama

OPENING REMARKS:

Petitioner (**Laura El-Sabaawi**, Wiley Rein LLP)
Respondents (**Matthew R. Nicely**, Hughes Hubbard & Reed LLP)

In Support of the Imposition of Antidumping and Countervailing Duty Orders:

Wiley Rein LLP
Washington, DC
on behalf of

American Kitchen Cabinet Alliance

Bill Allen, President and Chief Operating Officer,
Showplace Cabinetry

Ken Fritz, Kitchen and Bath Sales Manager, Schillings

John Gahm, President, Kitchen Kompact, Inc.

Chris Klein, Executive Chairman, Fortune Brands
Home & Security, Inc.

Perry Miller, President, Kountry Wood Products, LLC

Todd Sabine, Vice President of Sales and Marketing, American
Woodmark Corporation

Mark Trexler, President and Chief Executive Officer,
Master WoodCraft Cabinetry, LLC

**In Support of the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

Edwin Underwood, President and Chief Operating Officer,
Marsh Furniture Company

Stephen Wellborn, Director, Product and Research
Development, Wellborn Cabinet, Inc.

Dr. Seth T. Kaplan, President, International Economic Research LLC

Timothy C. Brightbill)
) – OF COUNSEL
Laura EI-Sabaawi)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders:**

Hughes Hubbard & Reed LLP
Washington, DC
on behalf of

Ad Hoc Coalition of Cabinet Importers (“ACCI”)

Chris Graff, Vice President, JS International Inc.

Robert Hunter, Chief Operating Officer, CNC Associates

Randy Goldstein, Chief Executive Officer, Kitchen Cabinet Distributors

Michael Weiner, Chairman, Kitchen Cabinet Distributors,
Managing Partner, Ninth Street Capital Partners

Missy O’Daniel, President/Chief Executive Officer, Web-Don Inc.

James P. Dougan, Vice President, Economic Consulting Services, LLC

Cara Groden, Senior Economist, Economic Consulting Services, LLC

Chris Fisher, Managing Principal, DuckerFrontier

Professor Howard P. Marvel, Professor Emeritus of Economics,
The Ohio State University

Emre Uyar, Ph.D., Principal, Cornerstone Research

Matthew R. Nicely)
Dean A. Pinkert)
) – OF COUNSEL
Julia K. Eppard)
Sydney Stringer)

**In Opposition to the Imposition of
Antidumping and Countervailing Duty Orders (continued):**

DLA Piper LLP (US)
Washington, DC
on behalf of

JS International, Inc. (“JSI”)

Chris Graff, Executive Vice President, JSI Cabinetry

Martin Schaefermeier) – OF COUNSEL

Clark Hill PLC
Washington, DC
on behalf of

Cabinets-to-Go, LLC (“Cabinets-to-Go”)

Jason Delves, President, Cabinets-to-Go, LLC

Mark R Ludwikowski)
) – OF COUNSEL
Courtney Gayle Taylor)

Husch Blackwell LLP
Washington, DC
on behalf of

China National Forest Products Industry Association

Jeffrey S. Neeley) – OF COUNSEL

Barnes, Richardson & Colburn, LLP
Washington, DC
on behalf of

Coalition of Bathroom Vanity Importers

Matthew T. McGrath) – OF COUNSEL

REBUTTAL/CLOSING REMARKS:

Petitioner (**Timothy C. Brightbill**, Wiley Rein LLP)
Respondents (**Matthew R. Nicely** and **Dean A. Pinkert**, Hughes Hubbard & Reed LLP)

APPENDIX C
SUMMARY DATA

Table C-1: WCVs: Summary data concerning the U.S. market for full units and components...	C-3
Table C-2: WCVs: Summary data concerning the U.S. market for full units	C-5
Table C-3: WCVs: Summary data concerning the merchant U.S. market for components	C-7
Table C-4: WCVs: Summary data concerning the total U.S. market for full units and components excluding one U.S. producer	C-8
Table C-5: WCVs: Summary data concerning the total U.S. market for full units excluding one U.S. producer	C-10

Full units & Components

Table C-1

WCVs: Summary data concerning the U.S. market for full units and components, 2016-18, January to September 2018, and January to September 2019
(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year		2017-18	Jan-Sep 2018-19
	2016	2017		2018	2018	2016-18	2016-17		
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
China:									
Value.....	1,031,738	1,253,443	1,586,811	1,088,197	967,438	▲53.8	▲21.5	▲26.6	▼(11.1)
Quantity.....	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054	▲46.3	▲17.8	▲24.2	▼(4.8)
Unit value.....	\$62	\$65	\$66	\$63	\$60	▲7.5	▲5.0	▲2.3	▼(4.7)
Ending inventory value.....	265,130	299,164	376,001	340,186	380,220	▲41.8	▲12.8	▲25.7	▲11.8
Nonsubject sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Average capacity quantity.....	59,715,151	61,656,774	61,892,859	46,987,194	46,946,815	▲3.6	▲3.3	▲0.4	▼(0.1)
Production quantity.....	34,802,507	35,012,969	33,738,183	25,811,901	26,060,251	▼(3.1)	▲0.6	▼(3.6)	▲1.0
Capacity utilization (fn1).....	58.3	56.8	54.5	54.9	55.5	▼(3.8)	▼(1.5)	▼(2.3)	▲0.6
U.S. shipments:									
Value:									
Full units.....	6,480,488	6,683,089	6,750,235	5,130,145	5,155,105	▲4.2	▲3.1	▲1.0	▲0.5
Components.....	446,161	461,449	463,724	359,576	345,635	▲3.9	▲3.4	▲0.5	▼(3.9)
Full units and components.....	6,926,649	7,144,538	7,213,959	5,489,721	5,500,740	▲4.1	▲3.1	▲1.0	▲0.2
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Value.....	37,843	28,692	21,127	16,767	12,280	▼(44.2)	▼(24.2)	▼(26.4)	▼(26.8)
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory value.....	117,623	126,954	112,725	123,527	114,409	▼(4.2)	▲7.9	▼(11.2)	▼(7.4)
Inventories/total shipments (fn1).....	1.7	1.8	1.6	2.2	2.1	▼(0.1)	▲0.1	▼(0.2)	▼(0.2)
Production workers.....	33,929	35,146	35,459	35,615	34,893	▲4.5	▲3.6	▲0.9	▼(2.0)
Hours worked (1,000s).....	77,335	79,209	79,652	60,982	59,752	▲3.0	▲2.4	▲0.6	▼(2.0)
Wages paid (\$1,000).....	1,224,109	1,281,955	1,369,862	1,072,671	1,070,211	▲11.9	▲4.7	▲6.9	▼(0.2)
Hourly wages (dollars per hour).....	\$15.83	\$16.18	\$17.20	\$17.59	\$17.91	▲8.7	▲2.2	▲6.3	▲1.8
Productivity (fn3).....	\$90.06	\$90.56	\$90.83	\$90.30	\$92.27	▲0.9	▲0.6	▲0.3	▲2.2
Labor costs (fn1) (fn4).....	17.6	17.9	18.9	19.5	19.4	▲1.4	▲0.3	▲1.1	▼(0.1)

Table continued on next page.

Table C-1--Continued

WCVs: Summary data concerning the U.S. market for full units and components, 2016-18, January to September 2018, and January to September 2019
 (Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sep
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. producers:									
Net sales:									
Value.....	6,961,732	7,172,873	7,234,966	5,397,132	5,409,664	▲3.9	▲3.0	▲0.9	▲0.2
Quantity.....	34,829,695	34,904,822	33,687,434	24,954,305	25,263,436	▼(3.3)	▲0.2	▼(3.5)	▲1.2
Unit value.....	\$187	\$192	\$201	\$202	\$200	▲7.4	▲2.8	▲4.5	▼(0.7)
Cost of goods sold (COGS).....	5,175,664	5,360,839	5,522,269	4,097,539	4,124,498	▲6.7	▲3.6	▲3.0	▲0.7
Gross profit or (loss) (fn2).....	1,786,068	1,812,034	1,712,697	1,299,593	1,285,166	▼(4.1)	▲1.5	▼(5.5)	▼(1.1)
SG&A expenses.....	1,029,604	1,064,413	1,161,149	843,462	833,850	▲12.8	▲3.4	▲9.1	▼(1.1)
Operating income or (loss) (fn2).....	756,464	747,621	551,548	456,131	451,316	▼(27.1)	▼(1.2)	▼(26.2)	▼(1.1)
Net income or (loss) (fn2).....	570,382	553,713	366,927	339,599	293,422	▼(35.7)	▼(2.9)	▼(33.7)	▼(13.6)
Capital expenditures.....	198,034	199,850	190,910	135,581	102,664	▼(3.6)	▲0.9	▼(4.5)	▼(24.3)
R&D expenses.....	16,437	16,530	16,849	12,801	11,520	▲2.5	▲0.6	▲1.9	▼(10.0)
Net assets.....	3,860,505	4,387,783	4,948,370	NA	NA	▲28.2	▲13.7	▲12.8	NA
Unit COGS.....	\$138	\$142	\$152	\$152	\$151	▲10.2	▲3.2	▲6.8	▼(0.3)
Unit SG&A expenses.....	\$28	\$29	\$33	\$32	\$32	▲16.6	▲3.0	▲13.2	▼(1.8)
Unit operating income or (loss) (fn2).....	\$21	\$20	\$16	\$17	\$17	▼(24.1)	▼(0.5)	▼(23.7)	▼(1.8)
Unit net income or (loss) (fn2).....	\$16	\$16	\$11	\$13	\$11	▼(34.0)	▼(0.8)	▼(33.5)	▼(13.9)
COGS/sales (fn1).....	74.3	74.7	76.3	75.9	76.2	▲2.0	▲0.4	▲1.6	▲0.3
Operating income or (loss)/sales (fn1).....	10.9	10.4	7.6	8.5	8.3	▼(3.2)	▼(0.4)	▼(2.8)	▼(0.1)
Net income or (loss)/sales (fn1).....	8.2	7.7	5.1	6.3	5.4	▼(3.1)	▼(0.5)	▼(2.6)	▼(0.9)

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. Values are presented for all in-scope merchandise while quantities and unit values are presented and calculated using full units only (i.e., excluding the value of components).

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.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Full units

Table C-2

WCVs: Summary data concerning the U.S. market for full units, 2016-18, January to September 2018, and January to September 2019
 (Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year		2017-18	Jan-Sep 2018-19
	2016	2017		2018	2018	2016-17	2016-17		
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲4.8	▲1.9	▲2.8	▼(1.3)
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
China:									
Value.....	909,487	1,125,002	1,429,836	974,597	884,531	▲57.2	▲23.7	▲27.1	▼(9.2)
Quantity.....	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054	▲46.3	▲17.8	▲24.2	▼(4.8)
Unit value.....	\$62	\$65	\$66	\$63	\$60	▲7.5	▲5.0	▲2.3	▼(4.7)
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Average capacity quantity.....	59,715,151	61,656,774	61,892,859	46,987,194	46,946,815	▲3.6	▲3.3	▲0.4	▼(0.1)
Production quantity.....	34,802,507	35,012,969	33,738,183	25,811,901	26,060,251	▼(3.1)	▲0.6	▼(3.6)	▲1.0
Capacity utilization (fn1).....	58.3	56.8	54.5	54.9	55.5	▼(3.8)	▼(1.5)	▼(2.3)	▲0.6
U.S. shipments:									
Value.....	6,480,488	6,683,089	6,750,235	5,130,145	5,155,105	▲4.2	▲3.1	▲1.0	▲0.5
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Inventories/total shipments (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Production workers (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Hours worked (1,000s) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Wages paid (\$1,000) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (fn3) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit labor costs (fn1) (fn4) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-2--Continued

WCVs: Summary data concerning the U.S. market for full units, 2016-18, January to September 2018, and January to September 2019

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year		2017-18	Jan-Sep 2018-19
	2016	2017		2018	2018	2016-18	2016-17		
U.S. producers':									
Net sales:									
Value.....	6,503,579	6,697,680	6,756,863	5,028,626	5,056,517	▲3.9	▲3.0	▲0.9	▲0.6
Quantity.....	34,829,695	34,904,822	33,687,434	24,954,305	25,263,436	▼(3.3)	▲0.2	▼(3.5)	▲1.2
Unit value.....	\$187	\$192	\$201	\$202	\$200	▲7.4	▲2.8	▲4.5	▼(0.7)
Cost of goods sold (COGS).....	4,800,578	4,964,813	5,117,170	3,786,554	3,821,883	▲6.6	▲3.4	▲3.1	▲0.9
Gross profit or (loss) (fn2).....	1,703,001	1,732,867	1,639,693	1,242,072	1,234,634	▼(3.7)	▲1.8	▼(5.4)	▼(0.6)
SG&A expenses.....	988,067	1,019,921	1,114,527	809,863	804,737	▲12.8	▲3.2	▲9.3	▼(0.6)
Operating income or (loss) (fn2).....	714,934	712,946	525,166	432,209	429,897	▼(26.5)	▼(0.3)	▼(26.3)	▼(0.5)
Net income or (loss) (fn2).....	560,691	557,391	357,677	324,540	282,811	▼(36.2)	▼(0.6)	▼(35.8)	▼(12.9)
Capital expenditures (fn5).....	***	***	***	***	***	▼***	▲***	▼***	▼***
R&D expenses (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net assets (fn5).....	***	***	***	NA	NA	▲***	▲***	▲***	#REF!
Unit COGS.....	\$138	\$142	\$152	\$152	\$151	▲10.2	▲3.2	▲6.8	▼(0.3)
Unit SG&A expenses.....	\$28	\$29	\$33	\$32	\$32	▲16.6	▲3.0	▲13.2	▼(1.8)
Unit operating income or (loss) (fn2).....	\$21	\$20	\$16	\$17	\$17	▼(24.1)	▼(0.5)	▼(23.7)	▼(1.8)
Unit net income or (loss) (fn2).....	\$16	\$16	\$11	\$13	\$11	▼(34.0)	▼(0.8)	▼(33.5)	▼(13.9)
COGS/sales (fn1).....	73.8	74.1	75.7	75.3	75.6	▲1.9	▲0.3	▲1.6	▲0.3
Operating income or (loss)/sales (fn1).....	11.0	10.6	7.8	8.6	8.5	▼(3.2)	▼(0.3)	▼(2.9)	▼(0.1)
Net income or (loss)/sales (fn1).....	8.6	8.3	5.3	6.5	5.6	▼(3.3)	▼(0.3)	▼(3.0)	▼(0.9)

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 "--". 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.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

fn5.--Reported employment data, capital expenditures, R&D expenses, and net assets excludes all firms that were solely merchant component producers.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

Components

Table C-3

WCVs: Summary data concerning the merchant U.S. market for components, 2016-18, January to September 2018, and January to September 2019
(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year		2017-18	Jan-Sep 2018-19
	2016	2017		2018	2018	2016-17	2016-18		
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
Value:									
China.....	122,251	128,441	156,975	113,600	82,907	▲28.4	▲5.1	▲22.2	▼(27.0)
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. producers':									
U.S. shipments value.....	446,161	461,449	463,724	359,576	345,635	▲3.9	▲3.4	▲0.5	▼(3.9)
Production workers (fn3).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Hours worked (1,000s) (fn3).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Wages paid (\$1,000) (fn3).....	***	***	***	***	***	▲***	▲***	▼***	▲***
Hourly wages (dollars per hour) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net sales value.....	458,153	475,193	478,103	368,506	353,147	▲4.4	▲3.7	▲0.6	▼(4.2)
Cost of goods sold (COGS).....	375,086	396,026	405,099	310,985	302,615	▲8.0	▲5.6	▲2.3	▼(2.7)
Gross profit or (loss) (fn2).....	83,067	79,167	73,004	57,521	50,532	▼(12.1)	▼(4.7)	▼(7.8)	▼(12.2)
SG&A expenses.....	41,537	44,492	46,622	33,599	29,113	▲12.2	▲7.1	▲4.8	▼(13.4)
Operating income or (loss) (fn2).....	41,530	34,675	26,382	23,922	21,419	▼(36.5)	▼(16.5)	▼(23.9)	▼(10.5)
Net income or (loss) (fn2).....	9,691	(3,678)	9,250	15,059	10,611	▼(4.6)	▼***	▲***	▼(29.5)
COGS/sales (fn1).....	81.9	83.3	84.7	84.4	85.7	▲2.9	▲1.5	▲1.4	▲1.3
Operating income or (loss)/sales (fn1).....	9.1	7.3	5.5	6.5	6.1	▼(3.5)	▼(1.8)	▼(1.8)	▼(0.4)
Net income or (loss)/sales (fn1).....	2.1	(0.8)	1.9	4.1	3.0	▼(0.2)	▼(2.9)	▲2.7	▼(1.1)

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 "--". 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.

fn3.--Reported employment data are for all firms that were solely merchant component producers.

Related party exclusion - Full units & Components

Table C-4

WCVs: Summary data concerning the total U.S. market for full units and components excluding one U.S. producer *, 2016-18, January to September 2018, and January to September 2019**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year			Jan-Sep
	2016	2017		2018	2018	2016-18	2016-17	2017-18	2018-19
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
China:									
Value.....	1,031,738	1,253,443	1,586,811	1,088,197	967,438	▲53.8	▲21.5	▲26.6	▼(11.1)
Quantity.....	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054	▲46.3	▲17.8	▲24.2	▼(4.8)
Unit value.....	\$62	\$65	\$66	\$63	\$60	▲7.5	▲5.0	▲2.3	▼(4.7)
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
All import sources:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Included U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. shipments:									
Value:									
Full units.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Components.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Full units and components.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Inventories value/total shipments value (fn)	***	***	***	***	***	▼***	▲***	▼***	▼***
Production workers.....									
Hours worked (1,000s).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity (fn3).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Labor costs (fn1) (fn4).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-4--Continued

WCVs: Summary data concerning the total U.S. market for full units and components excluding one US producer *, 2016-18, January to September 2018, and January to September 2019**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to September		Calendar year			Jan-Sep
	2016	2017	2018	2018	2019	2016-18	2016-17	2017-18	2018-19
Included U.S. producers ¹ :									
Net sales:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
R&D expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net assets.....	***	***	***	NA	NA	▲***	▲***	▲***	NA
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***

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 "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease. Values are presented for all in-scope merchandise while quantities and unit values are presented and calculated using full units only (i.e., excluding the value of components).

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.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Related party exclusion - Full units

Table C-5

WCVs: Summary data concerning the total U.S. market for full units excluding one U.S. producer *, 2016-18, January to September 2018, and January to September 2019**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes				
	Calendar year		2018	January to September		Calendar year			Jan-Sep	
	2016	2017		2018	2018	2019	2016-18	2016-17	2017-18	2018-19
U.S. consumption value:										
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Producers' share (fn1):										
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Excluded producers.....	***	***	***	***	***	▲***	▼***	▲***	▲***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Importers' share (fn1):										
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
U.S. consumption quantity:										
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Producers' share (fn1):										
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Excluded producers.....	***	***	***	***	***	▲***	▼***	▲***	▲***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Importers' share (fn1):										
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
U.S. imports from:										
China:										
Value.....	909,487	1,125,002	1,429,836	974,597	884,531	▲57.2	▲23.7	▲27.1	▼(9.2)	▼(9.2)
Quantity.....	14,767,713	17,389,378	21,601,637	15,370,751	14,638,054	▲46.3	▲17.8	▲24.2	▼(4.8)	▼(4.8)
Unit value.....	\$62	\$65	\$66	\$63	\$60	▲7.5	▲5.0	▲2.3	▼(4.7)	▼(4.7)
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Nonsubject sources:										
Value.....	0	0	0	0	0	▲***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
Ending inventory value.....	***	***	***	***	***	▲***	▼***	▲***	▲***	▲***
All import sources:										
Value.....	0	0	0	0	0	▲***	▲***	▲***	▼***	▼***
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▼***	▼***
Ending inventory value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Included U.S. producers':										
Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***	▼***
Production quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***	▲***
U.S. shipments:										
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Export shipments:										
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Ending inventory value.....	***	***	***	***	***	▼***	▲***	▼***	▼***	▼***
Inventories value/total shipments value (fn	***	***	***	***	***	▼***	▲***	▼***	▼***	▼***
Production workers (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Hours worked (1,000s) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Wages paid (\$1,000) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***
Hourly wages (dollars per hour) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Productivity (fn3) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▲***
Unit labor costs (fn1) (fn4) (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-5--Continued

WCVs: Summary data concerning the total U.S. market for full units excluding one US producer *, 2016-18, January to September 2018, and January to September 2019**

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year			Jan-Sep 2018-19
	2016	2017		2018	2018	2019	2016-18	2016-17	
Included U.S. producers ¹ :									
Net sales:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures (fn5).....	***	***	***	***	***	▼***	▲***	▼***	▼***
R&D expenses (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net assets (fn5).....	***	***	***	NA	NA	▲***	▲***	▲***	NA
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***

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 "--". 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.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

fn5.--Reported employment data, capital expenditures, R&D expenses, and net assets excludes all firms that were solely merchant component producers.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060.

Table C-5--Continued

WCVs: Summary data concerning the total U.S. market for full units excluding one US producer ***, 2016-18, January to September 2018, and January to September 2019

(Quantity=units; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per unit; Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2018	January to September		Calendar year			Jan-Sep 2018-19
	2016	2017		2018	2018	2019	2016-18	2016-17	
Included U.S. producers ¹ :									
Net sales:									
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▲***	▼***	▼***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Capital expenditures (fn5).....	***	***	***	***	***	▼***	▲***	▼***	▼***
R&D expenses (fn5).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net assets (fn5).....	***	***	***	NA	NA	▲***	▲***	▲***	NA
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▼***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***

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 "--". 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.

fn3.--Productivity is shown as dollars per hour.

fn4.--Labor cost is shown as share of total shipments value.

fn5.--Reported employment data, capital expenditures, R&D expenses, and net assets excludes all firms that were solely merchant component producers.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060.

APPENDIX D

COMMERCE'S FINAL LTFV MARGINS

Table D-1**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
The Ancientree Cabinet Co., Ltd.	The Ancientree Cabinet Co., Ltd.	4.37
Dalian Meisen Woodworking Co., Ltd.	Dalian Meisen Woodworking Co., Ltd.	262.18
Foremost Worldwide Company Limited	Rizhao Foremost Woodwork Manufacturing Company, Ltd.	101.46
Foremost Worldwide Company Limited	Henan AiDiJia Furniture Co., Ltd.	101.46
Foremost Worldwide Company Limited	Suzhou Weiye Furniture Co., Ltd.	101.46
Foremost Worldwide Company Limited	Changsha Minwan Furniture Manufacturing Co., Ltd.	101.46
Anhui Jianlian Wood Products Co., Ltd.	Anhui Jianlian Wood Products Co., Ltd.	48.50
Anhui Swanch Cabinetry Co., Ltd.	Anhui Swanch Cabinetry Co., Ltd.	48.50
Anhui Xinyuanda Cupboard Co., Ltd.	Anhui Xinyuanda Cupboard Co., Ltd.	48.50
Beijing Oulu Jinxin International Trade Co., Ltd.	Beijing Oulu Jinxin International Trade Co., Ltd.	48.50
Boloni Smart Home Decor (Beijing) Co., Ltd.	Boloni Smart Home Decor (Beijing) Co., Ltd.	48.50
Caoxian Brothers Hengxin Wood Industry Co., Ltd.	Caoxian Brothers Hengxin Wood Industry Co., Ltd.	48.50
Changyi Zhengheng Woodwork Co., Ltd.	Changyi Zhengheng Woodwork Co., Ltd.	48.50
Chaozhou Yafeng Bathroom Equipment Co., Ltd.	Chaozhou Yafeng Bathroom Equipment Co., Ltd.	48.50
China Friend Limited	Dongming Sanxin Wood Industry Co., Ltd.	48.50
Dalian Jiaye Wood Products Co., Ltd.	Dalian Jiaye Wood Products Co., Ltd.	48.50
Dalian Xingsen Wooden Products Co., Ltd.	Dalian Xingsen Wooden Products Co., Ltd.	48.50
Dandong City Anmin Wooden Products Group Co., Ltd.	Dandong City Anmin Wooden Products Group Co., Ltd.	48.50
Dandong Laroyal Cabinetry Co., Ltd.	Dandong Laroyal Cabinetry Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
DEHK Limited	Diam Display (China) Co., Ltd.	48.50
Deqing China-Africa Foreign Trade Port Co., Ltd.	Suqian Welcomewood Products Co., Ltd.	48.50
Dewell Wooden Products Haian Co., Ltd.	Dewell Wooden Products Haian Co., Ltd.	48.50
Dongguan American Parts Supplier Co., Ltd.	Dongguan American Parts Supplier Co., Ltd.	48.50
Dongguan Niusaiqu Wood Industry Co., Ltd.	Dongguan Niusaiqu Wood Industry Co., Ltd.	48.50
Dongguan Unique Life Furniture Co., Ltd. also known as Unique Life Furniture Co., Ltd. (trade name)	Dongguan Unique Life Furniture Co., Ltd.	48.50
Dorbest Ltd.	Rui Feng Woodwork (Dongguan) Co., Ltd.	48.50
Ezidone Display Corporation Ltd.	Ezidone Display Corporation Ltd.	48.50
Ezidone Display Corporation Ltd.	Ezidone Display Inc.	48.50
Forcer International Limited	Qufu Xinyu Furniture Co., Ltd.	48.50
Forcer International Limited	Linyi Runkang Cabinet Co., Ltd.	48.50
Forcer International Limited	Beijing Oulu Jinxin International Trade Co., Ltd.	48.50
Foshan City Shunde District Refined Furniture Co., Ltd. also known as Refined Furniture Co., Ltd. (trade name)	Foshan City Shunde District Refined Furniture Co., Ltd. also known as Refined Furniture Co., Ltd. (trade name)	48.50
Foshan Liansu building material Trading Co., Ltd.	Guangdong Lesso Home Furnishing Co., Ltd.	48.50
Foshan Nanhai Hongzhou Wood Co., Ltd.	Foshan Nanhai Hongzhou Wood Co., Ltd.	48.50
Foshan Shunde Yajiasi Kitchen Cabinet Co., Ltd.	Foshan Shunde Yajiasi Kitchen Cabinet Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Foshan Dibiao Bathroom Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Foshan MK Home Furnishing Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Prouder Industrial Limited	48.50
Foshan Sourcever (CN) Co., Ltd.	Foshan Demax Sanitary Ware Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Foshan Sourcever (CN) Co., Ltd.	Hebei Shuangli Furniture Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Zhangzhou Guohui Industrial & Trade Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Shouguang Fushi Wood Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Foshan Virtu Bathroom Furniture Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Guangdong Purefine Kitchen & Bath Technology Co., Ltd.	48.50
Foshan Sourcever (CN) Co., Ltd.	Kaiping Hongitaryware Technology Ltd.	48.50
Foshan Sourcever Company Limited	Foshan Dibiao Bathroom Co., Ltd.	48.50
Foshan Sourcever Company Limited	Foshan MK Home Furnishing Co., Ltd.	48.50
Foshan Sourcever Company Limited	Prouder Industrial Limited	48.50
Foshan Sourcever Company Limited	Foshan Demax Sanitary Ware Co., Ltd.	48.50
Foshan Sourcever Company Limited	Hebei Shuangli Furniture Co., Ltd.	48.50
Foshan Sourcever Company Limited	Zhangzhou Guohui Industrial & Trade Co., Ltd.	48.50
Foshan Sourcever Company Limited	Shouguang Fushi Wood Co., Ltd.	48.50
Foshan Sourcever Company Limited	Foshan Virtu Bathroom Furniture Ltd.	48.50
Foshan Sourcever Company Limited	Guangdong Purefine Kitchen & Bath Technology Co., Ltd.	48.50
Foshan Sourcever Company Limited	Kaiping Hongitaryware Technology Ltd.	48.50
Foshan Xinzhongwei Economic & Trade Co., Ltd.	Foshan Lihong Furniture Sanitary Ware Co., Ltd.	48.50
Fujian Dushi Wooden Industry Co., Ltd.	Fujian Dushi Wooden Industry Co., Ltd.	48.50
Fujian Leifeng Cabinetry Co., Ltd.	Fujian Leifeng Cabinetry Co., Ltd.	48.50
Fujian Panda Home Furnishing Co., Ltd.	Fujian Panda Home Furnishing Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Fujian Senyi Kitchen Cabinet Co., Ltd.	Fujian Senyi Kitchen Cabinet Co., Ltd.	48.50
Fuzhou Biquan Trading Co., Ltd.	Biquan (Fujian) Group Co., Ltd.	48.50
Fuzhou CBM Import & Export Co., Ltd.	Fuzhou CBM Import & Export Co., Ltd.	48.50
Fuzhou Desource Home Décor Co., Ltd.	Fuzhou Desource Home Decor Co., Ltd.	48.50
Fuzhou Limin Stone Products Co., Ltd.	Fuzhou YST Cabinet Co., Ltd.	48.50
Fuzhou Mastone Import & Export Co., Ltd.	Fuzhou Yuansentai Cabinet Co., Ltd.	48.50
Fuzhou Minlian Wood Industry Co., Ltd.	Fuzhou Minlian Wood Industry Co., Ltd.	48.50
Fuzhou Sunrising Home Deco Manufacturing Co., Ltd.	Fuzhou Sunrising Home Deco Manufacturing Co., Ltd.	48.50
Fuzhou Xinrui Cabinet Co., Ltd.	Fuzhou Xinrui Cabinet Co., Ltd.	48.50
Gaomi City Haitian Wooden Ware Co., Ltd.	Gaomi City Haitian Wooden Ware Co., Ltd.	48.50
Gaomi Hongtai Home Furniture Co., Ltd.	Gaomi Hongtai Home Furniture Co., Ltd.	48.50
Guangde Bozhong Trade Company, Ltd.	Guangde Bozhong Trade Company, Ltd.	48.50
Guangdong Cacar Kitchen Technology Co., Ltd.	Guangdong Cacar Kitchen Technology Co., Ltd.	48.50
Guangdong G-Top Import and Export Co., Ltd.	Foshan Shunde Rongao Furniture Co., Ltd.	48.50
Guangzhou Nuolande Import and Export Co., Ltd.	Guangzhou Nuolande Import and Export Co., Ltd.	48.50
Haiyang Kunlun Wood Co., Ltd.	Haiyang Kunlun Wood Co., Ltd.	48.50
Hangzhou Bestcraft Sanitary Equipments Co., Ltd.	Hangzhou Bestcraft Sanitary Equipments Co., Ltd.	48.50
Hangzhou Entop Houseware Co., Ltd.	Jinhua Aonika Sanitary Ware Co., Ltd.	48.50
Hangzhou Entop Houseware Co., Ltd.	Hangzhou Bestcraft Sanitary Equipments Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Hangzhou Hansen Sanitary Ware Co., Ltd.	Hangzhou Hansen Sanitary Ware Co., Ltd.	48.50
Hangzhou Hoca Kitchen & Bath Products Co., Ltd.	Hangzhou Hoca Kitchen & Bath Products Co., Ltd.	48.50
Hangzhou Home Dee Sanitary Ware Co., Ltd.	Hangzhou Home Dee Sanitary Ware Co., Ltd.	48.50
Hangzhou Oulang Bathroom Equipment Co., Ltd.	Hangzhou Oulang Bathroom Equipment Co., Ltd.	48.50
Hangzhou Royo Import & Export Co., Ltd.	Jinhua Aonika Sanitary Ware Co., Ltd.	48.50
Hangzhou Royo Import & Export Co., Ltd.	Hangzhou Yuxin Sanitary Ware Co., Ltd.	48.50
Hangzhou Royo Import & Export Co., Ltd.	Hangzhou Fuyang Beautiful Sanitary Ware Co., Ltd.	48.50
Hangzhou Sunlight Sanitary Co., Ltd.	Hangzhou Sunlight Sanitary Co., Ltd.	48.50
Hangzhou Weinuo Sanitary Ware Co., Ltd.	Pinghu Aipa Sanitary Ware Co., Ltd.	48.50
Hangzhou Weinuo Sanitary Ware Co., Ltd.	Hangzhou Qilong Sanitary Ware Co., Ltd.	48.50
Hangzhou Xinhai Sanitary Ware Co., Ltd.	Hangzhou Xinhai Sanitary Ware Co., Ltd.	48.50
Hangzhou Yewlong Import&Export Co., Ltd.	Hangzhou Yewlong Industry Co., Ltd.	48.50
Hangzhou Zhuangyu Import & Export Co., Ltd.	Hangzhou Zhuangyu Import & Export Co., Ltd.	48.50
Henan Aotin Home Furnishing Co., Ltd.	Henan Aotin Home Furnishing Co., Ltd.	48.50
Heyond Cabinet Co., Ltd.	Heyond Cabinet Co., Ltd.	48.50
Homestar Corporation	Homestar Corporation	48.50
Hong Kong Jian Cheng Trading Co., Limited	Zhongshan Yayue Furniture Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Xiamen Honglei Imp.&Exp. Co., Ltd. also known as Honglei (Xiamen) Stone Co., Ltd.	Changtai Guanjia Industry & Trade Company Co., Ltd.	48.50
Xiamen Honglei Imp.&Exp. Co., Ltd. also known as Honglei (Xiamen) Stone Co., Ltd.	Zhangzhou Huihua Industry and Trade Co., Ltd.	48.50
Xiamen Honglei Imp.&Exp. Co., Ltd. also known as Honglei (Xiamen) Stone Co., Ltd.	Fujian Xinanlong Wood Industry Co., Ltd.	48.50
Honsoar New Building Material Co., Ltd.	Shandong Honsoar Cabinet Materials Co., Ltd.	48.50
Hua Yin Trading Development Co., Ltd. of Jiangmen City	Jianfa Wooden Co., Ltd.	48.50
Hua Yin Trading Development Co., Ltd. of Jiangmen City	Heshan Yingmei Cabinets Co., Ltd.	48.50
Hua Yin Trading Development Co., Ltd. of Jiangmen City	Hesha Feiqiu Cabinet Co., Ltd.	48.50
Huimin Hanlong Furniture Co., Ltd.	Huimin Hanlong Furniture Co., Ltd.	48.50
Huisen Furniture (Long Nan) Co., Ltd. also known as Huisen Furniture (Longnan) Co., Ltd.	Huisen Furniture (Long Nan) Co., Ltd. also known as Huisen Furniture (Longnan) Co., Ltd.	48.50
Huizhou Mandarin Furniture Co., Ltd.	Huizhou Mandarin Furniture Co., Ltd.	48.50
Jiang Su Rongxin Cabinets Ltd.	Jiang Su Rongxin Cabinets Ltd.	48.50
Jiangmen Kinwai Furniture Decoration Co., Ltd.	Jiangmen Kinwai Furniture Decoration Co., Ltd.	48.50
Jiangmen Kinwai International Furniture Co., Ltd.	Jiangmen Kinwai International Furniture Co., Ltd.	48.50
Jiangsu Beichen Wood Co., Ltd.	Jiangsu Beichen Wood Co., Ltd.	48.50
Jiangsu Meijun Intelligent Home Co., Ltd.	Jiangsu Meijun Intelligent Home Co., Ltd.	48.50
Jiangsu Pusite Furniture Co., Ltd.	Jiangsu Pusite Furniture Co., Ltd.	48.50
Jiangsu Roc Furniture Industrial Co., Ltd.	Jiangsu Roc Furniture Industrial Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Jiangsu Sunwell Sabinetry Co., Ltd.	Jiangsu Sunwell Sabinetry Co., Ltd.	48.50
Jiangsu Weisen Houseware Co., Ltd.	Jiangsu Weisen Houseware Co., Ltd.	48.50
Jiangsu Xiangsheng Bedtime Furniture Co., Ltd.	Jiangsu Xiangsheng Bedtime Furniture Co., Ltd.	48.50
Jiayuan (Xiamen) Industrial Co., Ltd.	Jiayuan (Xiamen) Industrial Co., Ltd.	48.50
Jinjiang Perfect Generation Imp. & Exp. Co., Ltd.	Homebi Technology Co., Ltd.	48.50
King's Group Furniture (Enterprises) Co., Ltd.	Zhongshan King's Group Furniture (Enterprises) Co., Ltd.	48.50
KM Cabinetry Co., Limited	Zhongshan KM Cabinetry Co., Ltd.	48.50
Kunshan Baiyulan Furniture Co., Ltd.	Kunshan Baiyulan Furniture Co., Ltd.	48.50
Kunshan Home Right Trade Corporation	Kunshan Fangs Furniture Co., Ltd.	48.50
Lianyungang Sun Rise Technology Co., Ltd.	Lianyungang Sun Rise Technology Co., Ltd.	48.50
Linshu Meibang Furniture Co., Ltd.	Linshu Meibang Furniture Co., Ltd.	48.50
Linyi Bomei Furniture Co., Ltd.	Linyi Bomei Furniture Co., Ltd.	48.50
Linyi Bonn Flooring Manufacturing Co., Ltd.	Linyi Bonn Flooring Manufacturing Co., Ltd.	48.50
Linyi Kaipu Furniture Co., Ltd.	Linyi Kaipu Furniture Co., Ltd.	48.50
Linyi Runkang Cabinet Co., Ltd.	Linyi Runkang Cabinet Co., Ltd.	48.50
Liu Shu Woods Product (Huizhou) Co., Ltd. also known as Liu Shu Wood Products Co., Ltd. (trade name) and Liu Shu Woods Product Co., Ltd. (trade name)	Liu Shu Woods Product (Huizhou) Co., Ltd.	48.50
Master Door & Cabinet Co., Ltd.	Master Door & Cabinet Co., Ltd.	48.50
Masterwork Cabinetry Company Limited	Shandong Compete Wood Co., Ltd.	48.50
Masterwork Cabinetry Company Limited	Linyi Zhongsheng Jiaju Zhuangshi Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Meilin Wood Products (Dalian) Co., Ltd.	Meilin Wood Products (Dalian) Co., Ltd.	48.50
Minhou Beite Home Decor Co., Ltd.	Minhou Beite Home Decor Co., Ltd.	48.50
MJB Supply (Dalian) Co., Ltd.	Mulin City Baimiantong Linyeju Jisen Wood	48.50
Morewood Cabinetry Co., Ltd.	Morewood Cabinetry Co., Ltd.	48.50
Nanjing Kaylang Co., Ltd.	Nanjing Kaylang Co., Ltd.	48.50
Nantong Aershin Cabinets Co., Ltd.	Nantong Aershin Cabinets Co., Ltd.	48.50
Nantong Ouming Wood Co., Ltd.	Nantong Ouming Wood Co., Ltd.	48.50
Nantong Yangzi Furniture Co., Ltd.	Nantong Yangzi Furniture Co., Ltd.	48.50
Ningbo Kingwood Furniture Co., Ltd.	Ningbo Kingwood Furniture Co., Ltd.	48.50
Ningbo Rovsa Home Furnishing Co., Ltd.	Ningbo Rovsa Home Furnishing Co., Ltd.	48.50
Ojans Company Limited	Foshan Shunde Ojans Intelligent Sanitary Ware Co., Ltd.	48.50
Oppein Home Group Inc	Oppein Home Group Inc	48.50
Pizhou Ouyme Import & Export Trade Co., Ltd.	Xuzhou Oumec Wood-Based Panel Co., Ltd.	48.50
Pneuma Asia Sourcing & Trading Co. Limited	Dalian Tianxin Home Product Co., Ltd.	48.50
Pneuma Asia Sourcing & Trading Co. Ltd.	Qingdao Haiyan Drouot Household Co., Ltd.	48.50
Putian Jinggong Furniture Co., Ltd.	Putian Jinggong Furniture Co., Ltd.	48.50
Qingdao Coomex Sources Co., Ltd. also known as Coomex Sources Co., Ltd.	Nantong Aershin Cabinets Co., Ltd.	48.50
Qingdao Haiyan Drouot Household Co., Ltd.	Qingdao Haiyan Drouot Household Co., Ltd.	48.50
Qingdao Liangmu Hongye Co., Ltd.	Qingdao Liangmu Hongye Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Qingdao Liangmu Jinshan Woodwork Co., Ltd.	Qingdao Liangmu Jinshan Woodwork Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Lankao Sanqiang Wooden Products Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Linyi Lanshan Chengxinli Woods Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Shouguang Shi Qifeng Woods Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Linyi Mingzhu Woods Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Yichun Senhai Woods Industry Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Linyi Jinde Arts & Crafts Co., Ltd.	48.50
Qingdao Northriver Wooden Resource Industry & Trading Co., Ltd.	Qingdao Ruirong Woods Co., Ltd.	48.50
Qingdao Shousheng Industry Co., Ltd.	Qingdao Shousheng Industry Co., Ltd.	48.50
Qingdao Yimei Wood Work Co., Ltd.	Qingdao Yimei Wood Work Co., Ltd.	48.50
Qingdaohongxinchengda Wood Industry Co., Ltd.	Qingdaohongxinchengda Wood Industry Co., Ltd.	48.50
Qufu Xinyu Furniture Co., Ltd.	Qufu Xinyu Furniture Co., Ltd.	48.50
Ronbow Hong Kong Limited	Wuxi Yusheng Kitchen-Bathroom Equipment Co., Ltd.	48.50
Sagarit Bathroom Manufacturer Limited	Shouguang Fushi Wood Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Sagarit Bathroom Manufacturer Limited	Zhangzhou Guohui Industrial & Trade Co., Ltd.	48.50
Sagarit Bathroom Manufacturer Limited	Qingdao Runpeng Wood Industrial Co., Ltd.	48.50
Sankok Arts Co., Ltd.	Sankok Arts Co., Ltd.	48.50
Senke Manufacturing Company	Qindao Yimei Wood Work Co., Ltd.	48.50
Senke Manufacturing Company	Linyi Kaipu Furniture Co., Ltd.	48.50
Senke Manufacturing Company	Shandon Honsoar Cabinetry Co., Ltd.	48.50
Senke Manufacturing Company	Huimin Hanlong Furniture Co, Ltd.	48.50
Shandong Cubic Alpha Timber Co., Ltd.	Shandong Cubic Alpha Timber Co., Ltd.	48.50
Shandong Fusheng Wood Co., Ltd.	Shandong Fusheng Wood Co., Ltd.	48.50
Shandong Huanmei Wood Co., Ltd.	Shandong Huanmei Wood Co., Ltd.	48.50
Shandong Jingyao Home Decoration Products Co., Ltd.	Shandong Jingyao Home Decoration Products Co., Ltd.	48.50
Shandong Longsen Woods Co., Ltd.	Shandong Longsen Woods Co., Ltd.	48.50
Shandong Sanfortune Home and Furniture Co., Ltd.	Shandong Sanfortune Home and Furniture Co., Ltd.	48.50
Shanghai Aiwood Home Supplies Co., Ltd.	Jiangsu Gangxing Kitchen Cabinet Co., Ltd.	48.50
Shanghai Aiwood Home Supplies Co., Ltd.	Shanghai Homebase SanSheng Household Product Co., Ltd.	48.50
Shanghai Baiyulan Furniture Co., Ltd.	Kunshan Baiyulan Furniture Co., Ltd.	48.50
Shanghai Beautystar Cabinetry Co., Ltd.	Jiangsu Sunwell Cabinetry Co., Ltd.	48.50
Shanghai Beautystar Cabinetry Co., Ltd.	Nantong Jiegao Furniture Co., Ltd.	48.50
Shanghai Jiang Feng Furniture Co., Ltd.	Shanghai Jiang Feng Furniture Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Shanghai Line King International Trading Co., Ltd.	Shanghai Yazhi Wooden Industry Co., Ltd.	48.50
Shanghai Mebo Industry Co. Ltd.	Shanghai Mebo Industry Co. Ltd.	48.50
Shanghai Qingzhou Woodenware Co., Ltd.	Shanghai Qingzhou Woodenware Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Anhui GeLun Wood Industry Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Ning'an City Jiude Wood Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Muling City Bamiantong Forestry Bureau Jisen Wood Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Dalian Ruiyu Mountain Wood Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Linshu Meibang Furniture Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Jiamusi City Quanhong Wood Industry Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Kunshan Fangs Furniture Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Dalian Chunyao Wood Industry Co., Ltd.	48.50
Shanghai S&M Trade Co., Ltd.	Anhui Juxin Wood Industry Co., Ltd.	48.50
Shanghai Wang Lei Industries—Taicang Branch	Shanghai Wang Lei Industries—Taicang Branch	48.50
Shanghai Wen Bo Industries Co. Ltd.	Shanghai Yinbo Manufacturing Co. Ltd.	48.50
Shanghai Wen Bo Industries Co. Ltd.	Dalian Jiaye Wood Products Co., Ltd.	48.50
Shanghai Wen Bo Industries Co. Ltd.	Shanghai Baiyulan Furniture Co., Ltd.	48.50
Shanghai Xietong (Group) Co., Ltd.	Nantong Jiegao Furniture Co., Ltd.	48.50
Shanghai Xietong (Group) Co., Ltd.	Jiangsu Senwei Smart Home Co., Ltd.	48.50
Shanghai Zifeng International Trading Co., Ltd.	Shandong Gainvast Wooden Products Co., Ltd.	48.50
Shanghai Zifeng International Trading Co., Ltd.	Shanghai Wenyi Wooden Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Shanghai Zifeng International Trading Co., Ltd.	Nan Tong Di Lin Furniture Co., Ltd.	48.50
Shanghai Zifeng International Trading Co., Ltd.	Jiangsu Yanan Wooden Co., Ltd.	48.50
Sheen Lead International Trading (Shanghai) Co., Ltd.	Shanghai Ruiying Furniture Co., Ltd.	48.50
Shouguang Fushi Wood Co., Ltd.	Shouguang Fushi Wood Co., Ltd.	48.50
Shouguang Honsoar Imp. & Exp. Trading Co., Ltd.	Shouguang Honsoar Imp. & Exp. Trading Co., Ltd.	48.50
Shouguang Jiaxiu Wood Co., Ltd.	Shouguang Jiaxiu Wood Co., Ltd.	48.50
Shouguang Jiaxiu Wood Co., Ltd.	Shouguang Jiaxiu Wood Co., Ltd.	48.50
Shouguang Jinxiangyuan Home Furnishing Co., Ltd.	Shouguang Jinxiangyuan Home Furnishing Co., Ltd.	48.50
Shouguang Sanyang Wood Industry Co., Ltd.	Shouguang Sanyang Wood Industry Co., Ltd.	48.50
Silver Stone Group Co., Ltd.	Qingdao Family Crafts Co., Ltd.	48.50
Silver Stone Group Co., Ltd.	QingDao XiuZhen Furniture Co., Ltd.	48.50
Smart Gift International	Anhui GeLun Wood Industry Co., Ltd.	48.50
Smart Gift International	Ning'an City Jiude Wood Co., Ltd.	48.50
Smart Gift International	Muling City Bamiantong Forestry Bureau Jisen Wood Co., Ltd.	48.50
Smart Gift International	Dalian Ruiyu Mountain Wood Co., Ltd.	48.50
Smart Gift International	Jiamusi City Quanhong Wood Industry Co., Ltd.	48.50
Smart Gift International	Dalian Chunyao Wood Industry Co., Ltd.	48.50
Sunco Timber (Kunshan) Co., Ltd.	Sunco Timber (Kunshan) Co., Ltd.	48.50
Supree (Fujian) Wood Co., Ltd.	Supree (Fujian) Wood Co., Ltd.	48.50
Supree (Fujian) Construction Materials Co., Ltd.	Supree (Fujian) Construction Materials Co., Ltd.	48.50
Suzhou Baocheng Industries Co., Ltd.	Wallbeyond (Shuyang) Home Decor Co., Ltd.	48.50
Suzhou Five Cubic Wood Co., Ltd.	Suzhou Geda Office Equipment Manufacturing Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Suzhou Oriental Dragon Import and Export Co., Ltd. also known as Suzhou Oriental Dragon Import and Export Corp., Ltd.	Lingbi Xianghe Wood Co., Ltd.	48.50
Tai Yuan Trading Co., Ltd. also known as Heshan Tai Yuan Trading Co., Ltd.	Heshan Yingmei Cabinet Co., Ltd.	48.50
Taishan Changfa Wood Industry Co., Ltd.	Taishan Changfa Wood Industry Co., Ltd.	48.50
Taishan Hongxiang Trading Co., Ltd.	Chang He Xing Wood Manufacturer Co., Ltd.	48.50
Taishan Hongxiang Trading Co., Ltd.	Heshan Yingmei Cabinets Co., Ltd.	48.50
Taishan Hongxiang Trading Co., Ltd.	Heshan Feiqiu Cabinet Co., Ltd.	48.50
Taishan Hongxiang Trading Co., Ltd.	Yuanwang Wood Product Factory Dajiang Taishan	48.50
Taishan Hongxiang Trading Co., Ltd.	Can-Am Cabinet Ltd.	48.50
Taishan Hongzhou Cabinet Co., Ltd.	Taishan Hongzhou Cabinet Co., Ltd.	48.50
Taishan Jiahong Trade Co., Ltd.	Taishan Dajiang Town Dutou Wood Furniture Factory	48.50
Taishan Jiahong Trade Co., Ltd.	Foshan Nanhai Jinwei Cabinet Furniture Co., Ltd.	48.50
Taishan Jiahong Trade Co., Ltd.	Taishan Huali Kitchen Cabinet Co., Ltd.	48.50
Taishan Jiahong Trade Co., Ltd.	Taishan Empire Wood Co., Ltd.	48.50
Taishan Oversea Trading Company Ltd.	Taishan Ganhui Stone Kitchen Co., Ltd.	48.50
Taishan Oversea Trading Company Ltd.	Can-Am Cabinet Ltd.	48.50
Taishan Oversea Trading Company Ltd.	Taishan Quanmei Kitchen Ware Co., Ltd.	48.50
Taishan Oversea Trading Company Ltd.	Taishan Jiafu Cabinet Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Taishan Oversea Trading Company Ltd.	Taishan Dajiang Town Dutou Furniture Factory	48.50
Taishan Oversea Trading Company Ltd.	Feiteng Kitchen Cabinets Taishan Corporation	48.50
Taizhou Overseas Int’l Ltd.	Zhejiang Royal Home Co., Ltd.	48.50
Tangshan Baozhu Furniture Co., Ltd.	Tangshan Baozhu Furniture Co., Ltd.	48.50
Tech Forest Cabinetry Co., Ltd.	Tech Forest Cabinetry Co., Ltd.	48.50
The Frame Manufacturing Co. Ltd.	Huizhou Diweixin Jiatingyongpin Co., Ltd.	48.50
Top Goal International Group Ltd. (Hong Kong)	Dongguan City Top Goal Furniture Co., Ltd.	48.50
Tradewinds Furniture Ltd.	Tradewinds Furniture Ltd.	48.50
Wa Fok Art Craft Furniture (MACAO) Co., Ltd.	Zhongshan Huafu Art Craft Furniture Co., Ltd.	48.50
Weifang Fuxing Wood Co., Ltd.	Weifang Fuxing Wood Co., Ltd.	48.50
Weifang Kitchinet Corporation	Weifang Kitchinet Corporation	48.50
Weifang Lan Gu Wood Industry Co., Ltd.	Weifang Lan Gu Wood Industry Co., Ltd.	48.50
Weifang Master Wood Industry Co., Ltd.	Weifang Master Wood Industry Co., Ltd.	48.50
Weifang Yuanlin Woodenware Co., Ltd.	Weifang Yuanlin Woodenware Co., Ltd.	48.50
Weihai Adornus Cabinetry Manufacturing Co., Ltd.	Weihai Adornus Cabinetry Manufacturing Co., Ltd.	48.50
Weihai Jarlin Cabinetry Manufacture Co., Ltd.	Weihai Jarlin Cabinetry Manufacture Co., Ltd.	48.50
Wellday International Company Limited also known as Dongguan Wellday Household Co., Ltd.	Wellday International Company Limited also known as Dongguan Wellday Household Co., Ltd.	48.50
Wenzhou Youbo Industrial Co., Ltd.	Wenzhou Youbo Industrial Co., Ltd.	48.50
Wuxi Yushea Furniture Co., Ltd.	Wuxi Yushea Furniture Co., Ltd.	48.50
Wuxi Yusheng Kitchen-Bathroom Equipment Co., Ltd.	Wuxi Yusheng Kitchen-Bathroom Equipment Co., Ltd.	48.50
Xiamen Adler Cabinetry Co., Ltd.	Xiamen Adler Cabinetry Co., Ltd.	48.50

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Table D-1—Continued**WCVs: Commerce’s final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Xiamen Go For Stone Co., Ltd.	Kaicheng (Fujian) Kitchen Cabinet Co., Ltd.	48.50
Xiamen Golden Huanan Imp. & EXP. CO., Ltd.	Changtai Guanjia Industrial Co., Ltd.	48.50
Xiamen Goldenhome Co., Ltd.	Xiamen Goldenhome Co., Ltd.	48.50
Xiamen Kaicheng Trading Limited Company	Kaicheng (Fujian) Kitchen Cabinet Co., Ltd.	48.50
Xiamen Sintop Display Fixtures Co., Ltd.	Xiamen Sintop Display Fixtures Co., Ltd.	48.50
Xingzhi International Trade Limited	Xuzhou Yihe Wood Co., Ltd.	48.50
Xuzhou Jia Li Duo Import & Export Co., Ltd.	Xuzhou Oumec Wood-Based Panel Co., Ltd.	48.50
Xuzhou Yihe Wood Co., Ltd.	Xuzhou Yihe Wood Co., Ltd.	48.50
Yekalon Industry, Inc.	Dongguan Toda Furniture Co., Ltd.	48.50
Yekalon Industry, Inc.	Guangzhoushi Baisen Decorative Materials Company Limited	48.50
Yekalon Industry, Inc.	Dongguan Fanyanuo Furniture Co., Ltd.	48.50
Yekalon Industry, Inc.	Dongguanshi Anke Building Materials Co., Ltd.	48.50
Yekalon Industry, Inc.	Oriental Chic Furniture Company Limited	48.50
Yekalon Industry, Inc.	Dongguan Franciss Furniture Co., Ltd.	48.50
Yekalon Industry, Inc.	Shanghai Yuanyang Wooden Co., Ltd.	48.50
Yi Sen Wood Industry Limited Company of Ning An City	Yi Sen Wood Industry Limited Company of Ning An City	48.50
Yichun Dongmeng Wood Co., Ltd.	Yichun Dongmeng Wood Co., Ltd.	48.50
Yichun Dongmeng Wood Co., Ltd.	Qingdao Dimei Wood Co., Ltd.	48.50
Yichun Sunshine Wood Products Co., Ltd.	Yichun Sunshine Wood Products Co., Ltd.	48.50
Yixing Pengjia Cabinetry Co. Ltd.	Yixing Pengjia Cabinetry Co. Ltd.	48.50
Zhangjiagang Daye Hotel Furniture Co., Ltd.	Zhangjiagang Daye Hotel Furniture Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Zhangjiagang Pro-Fixture Co., Ltd.	Zhangjiagang Yuanjiahe Home Furniture Co., Ltd.	48.50
Zhangzhou City Xin Jia Hua Furniture Co., Ltd.	Zhangzhou City Xin Jia Hua Furniture Co., Ltd.	48.50
Zhangzhou Guohui Industrial & Trade Co., Ltd.	Zhangzhou Guohui Industrial & Trade Co., Ltd.	48.50
Zhangzhou OCA Furniture Co., Ltd.	Zhangzhou OCA Furniture Co., Ltd.	48.50
Zhaoqing Centech Decorative Material Company Ltd.	Zhaoqing Centech Decorative Material Company Ltd.	48.50
Zhejiang Jindi Holding Group Co., Ltd.	Zhejiang Jindi Holding Group Co., Ltd.	48.50
Zhong Shan Shi Yicheng Furniture & Craftwork Co., Ltd.	Zhong Shan Shi Yicheng Furniture & Craftwork Co., Ltd.	48.50
Zhong Shan Yue Qin Imp. & Exp. Co., Ltd.	Zhongshan Jinpeng Furniture Co., Ltd.	48.50
Zhongshan City Shenwan Meiting Furniture Factory	Zhongshan City Shenwan Meiting Furniture Factory	48.50
Zhongshan Fookyik Furniture Co., Ltd.	Zhongshan Fookyik Furniture Co., Ltd.	48.50
Zhongshan Gainwell Furniture Co., Ltd.	Zhongshan Gainwell Furniture Co., Ltd.	48.50
Zhongshan Guanda Furniture Manufacturing Co., Ltd. also known as Guanda Furniture Co., Ltd.	Zhongshan Guanda Furniture Manufacturing Co., Ltd.	48.50
Zhongshan Hengfu Furniture Company Limited	Zhongshan Hengfu Furniture Company Limited	48.50
Zhongshan King's Group Furniture (Enterprises) Co., Ltd.	Zhongshan King's Group Furniture (Enterprises) Co., Ltd.	48.50

Table continued on next page.

Table D-1—Continued**WCVs: Commerce's final weighted-average LTFV margins with respect to imports from China**

Exporter	Producer	Final weighted-average LTFV margin (percent)
Zhoushan For-strong Wood Co., Ltd.	Zhoushan For-strong Wood Co., Ltd.	48.50
Zhoushan For-strong Wood Co., Ltd.	Shanghai Wanmuda Furniture Co., Ltd.	48.50
Zhucheng Tonghe Woodworks Co., Ltd.	Zhucheng Tonghe Woodworks Co., Ltd.	48.50
Zhuhai Seagull Kitchen and Bath Products Co., Ltd.	Zhuhai Seagull Kitchen and Bath Products Co., Ltd.	48.50
Ziel International Co., Limited	Dongguan Fang Cheng Furniture Ltd.	48.50
Ziel International Co., Limited	ZhongShan Pro-Yearn Crafts Product Co., Ltd.	48.50
Ziel International Co., Limited	Fujian Newmark Industrial Co., Ltd.	48.50
Ziel International Co., Limited	Fuzhou Zhonghe Houseware Co., Ltd.	48.50
Ziel International Co., Limited	Ming Liang Furniture Product Co., Ltd.	48.50
Ziel International Co., Limited	Xianju Junyang Household Products Co., Ltd.	48.50
Ziel International Co., Limited	DongGuan HeTai Homewares Co., Ltd.	48.50
Ziel International Co., Limited	Cheng Tong Hardware Product Ltd.	48.50
Ziel International Co., Limited	Nantong Jon Ergonomic Office Co., Ltd.	48.50
China-Wide Entity ⁹		262.18

Source: 85 FR 11962, February 28, 2020.

APPENDIX E

U.S. SHIPMENTS AND APPARENT U.S. CONSUMPTION DATA BY PRODUCT TYPE

Table E-1

WCVs: U.S. producers' U.S. shipments of full-unit cabinets and vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments.— Vanities	949,304	987,579	970,062	732,138	736,880
Cabinets	5,547,386	5,717,496	5,812,186	4,422,327	4,443,520
Total full cabinet/vanity units	6,496,690	6,705,075	6,782,248	5,154,465	5,180,400
	Quantity (units)				
U.S. producers' U.S. shipments.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. producers' U.S. shipments.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments.— Vanities	14.6	14.7	14.3	14.2	14.2
Cabinets	85.4	85.3	85.7	85.8	85.8
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
U.S. producers' U.S. shipments.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-2

WCVs: U.S. importers' U.S. shipments of full-unit cabinets and vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: China.—					
Vanities	217,263	249,109	286,271	184,588	178,119
Cabinets	525,912	637,779	788,125	592,409	638,242
Total full cabinet/vanity units	743,175	886,888	1,074,396	776,997	816,361
	Quantity (units)				
U.S. importers' U.S. shipments: China.—					
Vanities	945,453	1,123,183	1,266,629	879,087	849,013
Cabinets	5,584,299	7,083,771	8,553,713	6,327,300	6,231,012
Total full cabinet/vanity units	6,529,752	8,206,954	9,820,342	7,206,387	7,080,025
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: China.—					
Vanities	230	222	226	210	210
Cabinets	94	90	92	94	102
Total full cabinet/vanity units	114	108	109	108	115
	Share of value (percent)				
U.S. importers' U.S. shipments: China.—					
Vanities	29.2	28.1	26.6	23.8	21.8
Cabinets	70.8	71.9	73.4	76.2	78.2
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
U.S. importers' U.S. shipments: China.—					
Vanities	14.5	13.7	12.9	12.2	12.0
Cabinets	85.5	86.3	87.1	87.8	88.0
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table E-2—Continued

WCVs: U.S. importers' U.S. shipments of full-unit cabinets and vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: Nonsubject sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: Nonsubject sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: Nonsubject sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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Table E-2—Continued

WCVs: U.S. importers' U.S. shipments of full-unit cabinets and vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: All import sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: All import sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: All import sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: All import sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: All import sources.— Vanities	***	***	***	***	***
Cabinets	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-3

WCVs: Apparent U.S. consumption and market shares for vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	949,304	987,579	970,062	732,138	736,880
U.S. importers' U.S. shipments from.— China	217,263	249,109	286,271	184,588	178,119
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (percent)				
U.S. producers' U.S. shipments	11.3	11.0	10.3	10.4	10.6
U.S. importers' U.S. shipments from.— China	2.6	2.8	3.0	2.6	2.6
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Table E-4

WCVs: Apparent U.S. consumption and market shares for cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	5,547,386	5,717,496	5,812,186	4,422,327	4,443,520
U.S. importers' U.S. shipments from.— China	525,912	637,779	788,125	592,409	638,242
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (percent)				
U.S. producers' U.S. shipments	65.9	63.9	61.7	62.8	63.6
U.S. importers' U.S. shipments from.— China	6.2	7.1	8.4	8.4	9.1
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Table E-5

WCVs: U.S. producers' U.S. shipments of furniture-style vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. producers' U.S. shipments.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. producers' U.S. shipments.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-6

WCVs: U.S. importers' U.S. shipments of furniture-style vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: China.—					
Furniture-style vanities	79,266	85,437	96,447	68,204	76,371
All other full cabinet/vanity units	663,908	801,451	977,949	708,793	739,990
Total full cabinet/vanity units	743,174	886,888	1,074,396	776,997	816,361
	Quantity (units)				
U.S. importers' U.S. shipments: China.—					
Furniture-style vanities	181,220	137,274	265,070	182,691	182,502
All other full cabinet/vanity units	6,348,532	8,069,680	9,555,272	7,023,696	6,897,523
Total full cabinet/vanity units	6,529,752	8,206,954	9,820,342	7,206,387	7,080,025
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: China.—					
Furniture-style vanities	437	622	364	373	418
All other full cabinet/vanity units	105	99	102	101	107
Total full cabinet/vanity units	114	108	109	108	115
	Share of value (percent)				
U.S. importers' U.S. shipments: China.—					
Furniture-style vanities	10.7	9.6	9.0	8.8	9.4
All other full cabinet/vanity units	89.3	90.4	91.0	91.2	90.6
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0
	Share of quantity (percent)				
U.S. importers' U.S. shipments: China.—					
Furniture-style vanities	2.8	1.7	2.7	2.5	2.6
All other full cabinet/vanity units	97.2	98.3	97.3	97.5	97.4
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0

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Table E-6—Continued

WCVs: U.S. importers' U.S. shipments of furniture-style vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: Nonsubject sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: Nonsubject sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: Nonsubject sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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Table E-6—Continued

WCVs: U.S. importers' U.S. shipments of furniture-style vanities, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: All import sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: All import sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: All import sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: All import sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: All import sources.— Furniture-style vanities	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-7
WCVs: Apparent U.S. consumption and market shares for furniture-style vanities, 2016-18,
January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.-- China	79,266	85,437	96,447	68,204	76,371
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.-- China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Note: Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

Table E-8

WCVs: U.S. producers' U.S. shipments of hospitality-style vanities and cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. producers' U.S. shipments.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. producers' U.S. shipments.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-9

WCVs: U.S. importers' U.S. shipments of hospitality-style vanities and cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
Value (1,000 dollars)					
U.S. importers' U.S. shipments: China.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	743,174	886,888	1,074,396	776,997	816,361
Quantity (units)					
U.S. importers' U.S. shipments: China.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	6,529,752	8,206,954	9,820,342	7,206,387	7,080,025
Unit value (dollars per unit)					
U.S. importers' U.S. shipments: China.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	114	108	109	108	115
Share of value (percent)					
U.S. importers' U.S. shipments: China.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0
Share of quantity (percent)					
U.S. importers' U.S. shipments: China.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table E-9—Continued

WCVs: U.S. importers' U.S. shipments of hospitality-style vanities and cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: Nonsubject sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: Nonsubject sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: Nonsubject sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: Nonsubject sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

Table continued on next page.

Table E-9—Continued

WCVs: U.S. importers' U.S. shipments of hospitality-style vanities and cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. importers' U.S. shipments: All import sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Quantity (units)				
U.S. importers' U.S. shipments: All import sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Unit value (dollars per unit)				
U.S. importers' U.S. shipments: All import sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments: All import sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments: All import sources.— Hospitality-style vanities and cabinets	***	***	***	***	***
All other full cabinet/vanity units	***	***	***	***	***
Total full cabinet/vanity units	***	***	***	***	***

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

Table E-10

WCVs: Apparent U.S. consumption and market shares for hospitality-style vanities and cabinets, 2016-18, January to September 2018, and January to September 2019

Item	Calendar year			January to September	
	2016	2017	2018	2018	2019
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***
	Ratio to overall apparent consumption (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments from.— China	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
U.S. producers and U.S. importers combined	***	***	***	***	***

Note: Shares and ratio shown as "0.0" represent values greater than zero, but less than "0.05" percent.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting number 9403.40.9060, accessed December 17, 2019.

APPENDIX F

NARRATIVE RESPONSES REGARDING DOMESTIC LIKE PRODUCTS

Table F-1**WCVs: U.S. producers', U.S. importers', and U.S. purchasers' comparisons of cabinets and vanities**

Factor	U.S. producers				U.S. importers				U.S. purchasers			
	F	M	S	N	F	M	S	N	F	M	S	N
	Count of firms											
Physical characteristics	28	13	3	2	12	17	23	21	10	12	10	3
Interchangeability	24	15	3	4	12	8	21	31	9	10	11	4
Channels of distribution	34	7	2	---	37	19	12	3	19	11	5	---
Manufacturing	37	5	2	---	46	14	5	5	21	5	4	---
Perceptions	26	16	3	---	28	18	16	10	15	11	6	3
Price	28	15	2	---	25	18	15	14	11	11	10	2

Note: F = Fully comparable, M = Mostly comparable, S = Somewhat comparable, N = Not-at-all comparable

Note: U.S. producers who are also U.S. purchasers accounted for 4 of the 10 “fully comparable” responses for physical characteristics, 4 of the 9 “fully comparable” responses for interchangeability, 6 of the 19 “fully comparable” responses for channels of distribution, 7 of the 21 “fully comparable” responses for manufacturing, 3 of the 15 “fully comparable” responses for perceptions, and 5 of the 11 “fully comparable” responses for price. They also accounted for 3 of the 12 “mostly comparable” responses for physical characteristics, 2 of the 10 “mostly comparable” responses for interchangeability, 1 of the 11 “mostly comparable” responses for channels of distribution, 4 of the 11 “mostly comparable” responses for perceptions, and 2 of the 11 “mostly comparable” responses for price.

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

Table F-2**WCVs: U.S. producers', U.S. importers', and U.S. purchasers' comparisons of hospitality-style cabinets and vanities and all other full-unit cabinets/vanities**

Factor	U.S. producers				U.S. importers				U.S. purchasers			
	F	M	S	N	F	M	S	N	F	M	S	N
	Count of firms											
Physical characteristics	9	19	4	1	4	5	11	8	2	6	11	1
Interchangeability	11	17	4	1	4	5	8	11	2	6	10	1
Channels of distribution	12	16	3	2	3	7	6	11	---	6	11	1
Manufacturing	11	17	3	1	5	7	9	5	2	7	6	1
Perceptions	6	20	6	2	3	7	8	9	1	7	9	1
Price	6	22	5	---	2	5	8	10	---	6	10	1

Note: F = Fully comparable, M = Mostly comparable, S = Somewhat comparable, N = Not-at-all comparable

Note: U.S. producers who are also U.S. purchasers accounted for 1 of the 2 “fully comparable” responses for physical characteristics, 1 of the 2 “fully comparable” responses for interchangeability, and all of the “fully comparable” responses for manufacturing. They also accounted for 5 of the 6 “mostly comparable” responses for physical characteristics, 5 of the 6 “mostly comparable” responses for interchangeability, 5 of the 6 “mostly comparable” responses for channels of distribution, 4 of the 7 “mostly comparable” responses for manufacturing, 5 of the 7 “mostly comparable” responses for perceptions, 5 of the 6 “mostly comparable” responses for price, 1 of the 11 “somewhat comparable” responses for channels of distribution, and 1 of the 9 “somewhat comparable” responses for perception.

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

Table F-3

WCVs: U.S. producers', U.S. importers', and U.S. purchasers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities

Factor	U.S. producers				U.S. importers				U.S. purchasers			
	F	M	S	N	F	M	S	N	F	M	S	N
	Count of firms											
Physical characteristics	8	24	5	1	2	4	23	15	3	10	15	5
Interchangeability	10	24	3	1	4	5	20	16	4	8	13	8
Channels of distribution	18	15	3	---	11	10	15	4	7	10	15	1
Manufacturing	14	18	3	1	8	8	14	11	7	10	8	1
Perceptions	8	26	2	1	5	9	17	10	6	9	14	5
Price	6	24	6	---	3	5	17	13	3	6	16	6

Note: F = Fully comparable, M = Mostly comparable, S = Somewhat comparable, N = Not-at-all comparable

Note: U.S. producers who are also U.S. purchasers accounted for 1 of the 3 “fully comparable” responses for physical characteristics, 2 of the 4 “fully comparable” responses for interchangeability, 3 of the 7 “fully comparable” responses for channels of distribution, 3 of the 7 “fully comparable” responses for manufacturing, 1 of the 6 “fully comparable” responses for perceptions, and 1 of the 6 “fully comparable” responses for price. They also accounted for 5 of the 10 “mostly comparable” responses for physical characteristics, 4 of the 8 “mostly comparable” responses for interchangeability, 3 of the 10 “mostly comparable” responses for channels of distribution, 3 of the 10 “mostly comparable” responses for manufacturing, 5 of the 9 “mostly comparable” responses for perceptions, and 5 of the 6 “mostly comparable” responses for price.

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

Table F-4

WCVs: U.S. producers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
Furniture-style vanities vs all other: Physical characteristics:	
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Table F-4—Continued

WCVs: U.S. producers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
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Source: Compiled from data submitted in response to Commission questionnaires.

Table F-5

WCVs: U.S. importers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
Furniture-style vanities vs all other: Physical characteristics:	
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Table F-5—Continued
WCVs: U.S. importers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
Furniture-style vanities vs all other: Channels of distribution:	
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Table F-6—Continued

WCVs: U.S. purchasers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
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Furniture-style vanities vs other: Interchangeability:	
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Table F-6—Continued
WCVs: U.S. purchasers’ comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
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Furniture-style vanities vs other: Channels of distribution:	
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Furniture-style vanities vs other: Manufacturing:	
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Table F-6—Continued
WCVs: U.S. purchasers’ comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
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Furniture-style vanities vs other: Perceptions:	
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Furniture-style vanities vs other: Price:	
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Table F-6—Continued
WCVs: U.S. purchasers' comparisons of furniture-style vanities and all other full-unit cabinets/vanities under the domestic like product factors

Item / Firm	Narrative
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Source: Compiled from data submitted in response to Commission questionnaires.

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