

# **Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates**

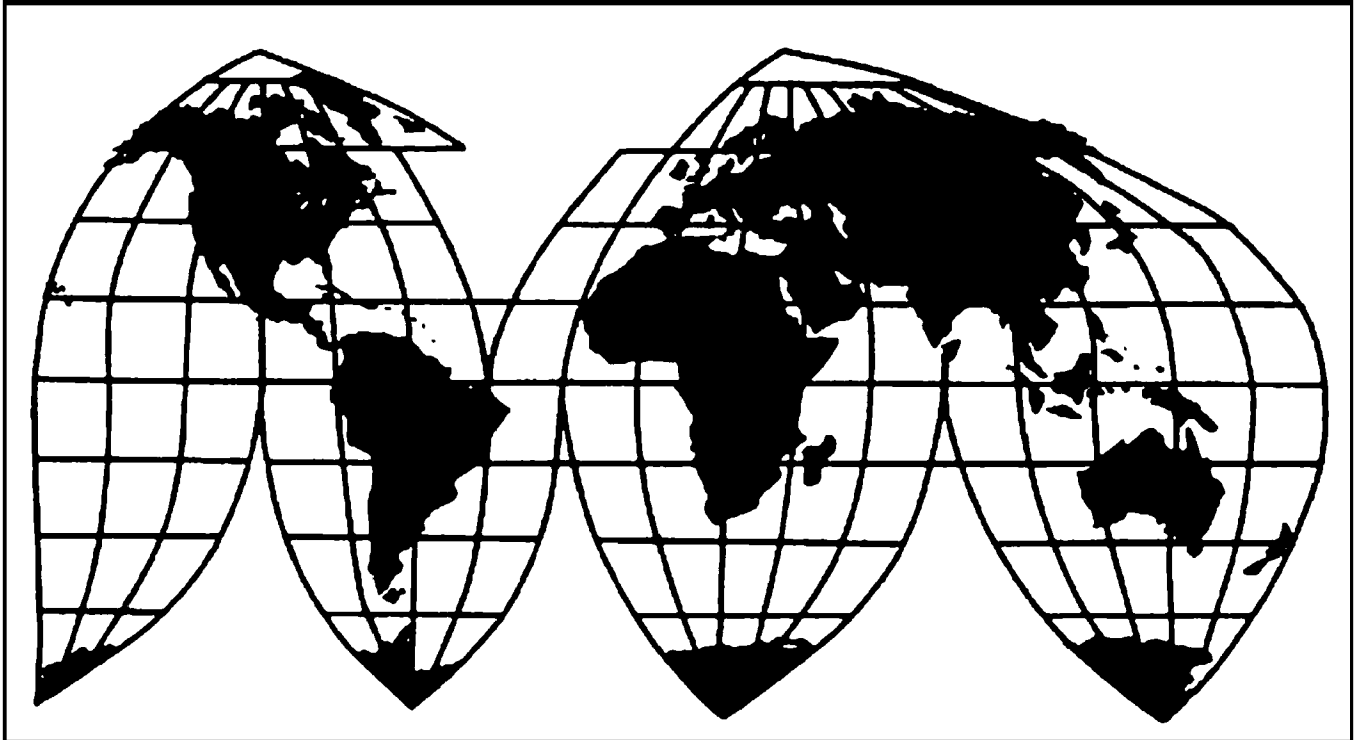


Investigation Nos.701-TA-646 and 731-TA-1502-1516 (Preliminary)

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**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# 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Note.—Information that would reveal confidential operations of individual concerns may not be published.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-646 and 731-TA-1502-1516 (Preliminary)

Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of prestressed concrete steel wire strand (“PC strand”) from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates (“UAE”) provided for in subheading 7312.10.30 of the Harmonized Tariff Schedule of the United States, that are alleged to be sold in the United States at less than fair value (“LTFV”) and to be subsidized by the government of Turkey.<sup>2</sup>

### COMMENCEMENT OF FINAL PHASE INVESTIGATIONS

Pursuant to section 207.18 of the Commission’s rules, the Commission also gives notice of the commencement of the final phase of its investigations. The Commission will issue a final phase notice of scheduling, which will be published in the *Federal Register* as provided in section 207.21 of the Commission’s rules, upon notice from the U.S. Department of Commerce (“Commerce”) of affirmative preliminary determinations in the investigations under sections 703(b) or 733(b) of the Act, or, if the preliminary determinations are negative, upon notice of affirmative final determinations in those investigations under sections 705(a) or 735(a) of the

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<sup>1</sup> The record is defined in sec. 207.2(f) of the Commission’s Rules of Practice and Procedure (19 CFR 207.2(f)).

<sup>2</sup> *Prestressed Concrete Steel Wire Strand From Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, the Republic of Turkey, Ukraine, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations*; 85 FR 28605 (May 13, 2020), and *Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Initiation of Countervailing Duty Investigation*; 85 FR 28610 (May 13, 2020).

Act. Parties that filed entries of appearance in the preliminary phase of the investigations need not enter a separate appearance for the final phase of the investigations. Industrial users, and, if the merchandise under investigation is sold at the retail level, representative consumer organizations have the right to appear as parties in Commission antidumping and countervailing duty investigations. The Secretary will prepare a public service list containing the names and addresses of all persons, or their representatives, who are parties to the investigations.

## **BACKGROUND**

On April 16, 2020, Insteel Wire Products Company, Mount Airy, North Carolina, Sumiden Wire Products Corporation, Dickson, Tennessee, and Wire Mesh Corporation, Houston, Texas, filed petitions with the Commission and Commerce, alleging that an industry in the United States is materially injured or threatened with material injury by reason of subsidized imports of PC strand from Turkey and LTFV imports of PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and UAE. Accordingly, effective April 16, 2020, the Commission instituted countervailing duty investigation No. 701-TA-646 and antidumping duty investigation Nos. 731-TA-1502-1516 (Preliminary).

Notice of the institution of the Commission's investigations and of a public conference 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* of April 23, 2020 (85 FR 22751). In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its conference through written questions, submissions of opening remarks and written testimony, written responses to questions, and postconference briefs. All persons who requested the opportunity were permitted to participate.



## Views of the Commission

Based on the record in the preliminary phase of these investigations, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of imports of prestressed concrete steel wire strand (“PC strand”) from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and the United Arab Emirates (the “UAE”) that are allegedly sold in the United States at less than fair value and imports of the subject merchandise from Turkey that are allegedly subsidized by the government of Turkey.

### I. The Legal Standard for Preliminary Determinations

The legal standard for preliminary antidumping and countervailing duty determinations requires the Commission to determine, based upon the information available at the time of the preliminary determinations, whether there is a reasonable indication that a domestic industry is materially injured or threatened with material injury, or that the establishment of an industry is materially retarded, by reason of the allegedly unfairly traded imports.<sup>1</sup> In applying this standard, the Commission weighs the evidence before it and determines whether “(1) the record as a whole contains clear and convincing evidence that there is no material injury or threat of such injury; and (2) no likelihood exists that contrary evidence will arise in a final investigation.”<sup>2</sup>

### II. Background

**Parties to the Investigations.** Insteel Wire Products Company (“Insteel”), Sumiden Wire Products Corporation (“Sumiden”), and Wire Mesh Corporation (“WMC”), domestic producers of PC strand (collectively, “petitioners”), filed the petitions in these investigations on April 16, 2020. Petitioners submitted written opening remarks, witness testimony for the conference from representatives of all three petitioning firms, and responses to staff questions, as well as a postconference brief.<sup>3</sup>

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<sup>1</sup> 19 U.S.C. §§ 1671b(a), 1673b(a) (2000); *see also American Lamb Co. v. United States*, 785 F.2d 994, 1001-04 (Fed. Cir. 1986); *Aristech Chem. Corp. v. United States*, 20 CIT 353, 354-55 (1996). No party argues that the establishment of an industry in the United States is materially retarded by the allegedly unfairly traded imports.

<sup>2</sup> *American Lamb Co.*, 785 F.2d at 1001; *see also Texas Crushed Stone Co. v. United States*, 35 F.3d 1535, 1543 (Fed. Cir. 1994).

<sup>3</sup> In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its conference in these investigations through written opening remarks, written questions, submissions of written testimony, written responses to questions, and post-conference briefs as set forth in procedures provided to the parties.

A number of respondent entities participated in these investigations. Athanor Steel LLC (“Athanor”), a U.S. importer of subject merchandise; Concrete Reinforcing Products (also known as A.G. Royce Metal Marketing LLC), a U.S. importer of subject merchandise; Chia Ta World Co., Ltd. (“Chia Ta”), a Taiwanese producer and exporter of subject merchandise; and WBO Italcables Societa’ Cooperativa, an Italian producer and exporter of subject merchandise (collectively, “Joint Respondents”) jointly submitted a written opening statement, witness testimony (of an Athanor representative) for the conference, responses to staff questions, and a postconference brief. In addition, Chia Ta separately submitted written witness testimony for the conference. United Wires ElSewedy Co. (“UWE”), an Egyptian producer and exporter of subject merchandise, submitted written witness testimony for the conference and a postconference brief. National Metal Manufacturing & Casting Co. (“Maadaniyah”), a Saudi producer and exporter of subject merchandise, submitted an opening statement and written witness testimony (by counsel) for the conference and a postconference brief. PJSC PA Stalkanat-Silur (“Stalkanat”), a Ukrainian producer and exporter of subject merchandise, submitted written witness testimony for the conference and a postconference brief.

In addition, the Government of Egypt submitted opening remarks after the conference, and the Department for Domestic Producer Defense of the Ministry for Development of Economy, Trade and Agriculture of Ukraine (the “Ukraine Trade Ministry”) submitted a postconference brief. The Commission also received letters with comments from the Saudi General Authority of Foreign Trade and the Government of Italy.

**Data Coverage.** U.S. industry data are based on the questionnaire responses of five domestic producers, accounting for all or almost all U.S. production of PC strand in 2019.<sup>4</sup> U.S. import data are based on official import statistics of the U.S. Department of Commerce (“Commerce”) under HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012. In addition, the Commission received usable questionnaire responses from ten U.S. importers, accounting for 84.3 percent of total subject imports and 87.3 percent of total imports of PC

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<sup>4</sup> Confidential Report (“CR”) at I-4, III-1; Public Report (“PR”) at I-4, III-1.

strand from all sources.<sup>5</sup> The Commission received usable responses to its questionnaires from 19 foreign producers of subject merchandise from 14 subject countries.<sup>6</sup>

### III. Domestic Like Product

In determining whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the “domestic like product” and the “industry.”<sup>7</sup> 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

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<sup>5</sup> CR/PR at I-4. The Commission received questionnaire responses from U.S. importers accounting for 63.6 percent of U.S. imports of PC strand from Argentina; 102.9 percent of U.S. imports from Colombia; 97.8 percent of U.S. imports from Egypt; 99.9 percent of U.S. imports from Indonesia; 92.3 percent of U.S. imports from Italy; 101.5 percent of U.S. imports from Malaysia; 0.0 percent of U.S. imports from the Netherlands; 6.3 percent of U.S. imports from Saudi Arabia; 90.8 percent of U.S. imports from South Africa; 11.3 percent of U.S. imports from Spain; 108.4 percent of U.S. imports from Taiwan; 111.3 percent of U.S. imports from Tunisia; 118.4 percent of U.S. imports from Turkey; 103.7 percent of U.S. imports from Ukraine; and 0.0 percent of U.S. imports from the UAE. CR/PR at IV-1. The response rates were calculated based on a comparison of the quantity of 2019 U.S. imports of PC strand as reported in the responses to the Commission’s U.S. importer questionnaires with the total quantity of U.S. imports reported in 2019 official import statistics. *Id.* at IV-1 n.3.

<sup>6</sup> CR/PR at I-4 to I-5. The Commission received usable questionnaire responses from one producer from Argentina, estimated to account for \*\*\* percent of production of PC strand in Argentina in 2019; one producer from Egypt, estimated to account for \*\*\* percent of production of PC strand in Egypt in 2019; two producers from Indonesia, estimated to account for \*\*\* percent of production of PC strand in Indonesia in 2019; two producers from Italy, estimated to account for \*\*\* percent of production of PC strand in Italy in 2019; two producers from Malaysia, estimated to account for \*\*\* percent of production of PC strand in Malaysia in 2019; one producer from the Netherlands, estimated to account for \*\*\* percent of production of PC strand in the Netherlands in 2019; two producers from Saudi Arabia, estimated to account for \*\*\* percent of production of PC strand in Saudi Arabia in 2019; one producer from South Africa, estimated to account for \*\*\* percent of production of PC strand in South Africa in 2019; one producer from Spain, estimated to account for \*\*\* percent of production of PC strand in Spain in 2019; one producer from Taiwan, estimated to account for \*\*\* percent of production of PC strand in Taiwan in 2019; one producer from Tunisia, estimated to account for \*\*\* percent of production of PC strand in Tunisia in 2019; two producers from Turkey, estimated to account for \*\*\* percent of production of PC strand in Turkey in 2019; one producer from Ukraine, estimated to account for \*\*\* percent of production of PC strand in Ukraine in 2019; and one producer from the UAE, estimated to account for \*\*\* percent of production of PC strand in the UAE in 2019. See CR /PR at VII-3 (Argentina); VII-11 (Egypt); VII-15 (Indonesia); VII-20 to VII-21 (Italy); VII-25 to VII-26 (Malaysia); VII-31 (the Netherlands); VII-36 (Saudi Arabia); VII-40 to VII-41 (South Africa); VII-46 to VII-47 (Spain); VII-50 to VII-51 (Taiwan); VII-54 to VII-55 (Tunisia); VII-58 to VII-59 (Turkey); VII-63 to VII-64 (Ukraine); VII-68 to VII-69 (the UAE). The Commission did not receive any foreign questionnaire responses from any subject producers in Colombia. CR/PR at VII-7.

<sup>7</sup> 19 U.S.C. § 1677(4)(A).

those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>8</sup> 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.”<sup>9</sup>

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.<sup>10</sup> 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.”<sup>11</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>12</sup> The decision regarding the appropriate domestic like product(s) 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.<sup>13</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>14</sup> The Commission looks for clear dividing lines among possible like products and disregards minor

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<sup>8</sup> 19 U.S.C. § 1677(4)(A).

<sup>9</sup> 19 U.S.C. § 1677(10).

<sup>10</sup> 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 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).

<sup>11</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>12</sup> *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).

<sup>13</sup> *See, e.g., Cleo*, 501 F.3d at 1299; *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).

<sup>14</sup> *See, e.g., S. Rep. No. 96-249 at 90–91 (1979).*

variations.<sup>15</sup> The Commission may, where appropriate, include domestic articles in the domestic like product in addition to those described in the scope.<sup>16</sup>

In its notices of initiation, Commerce defined the imported merchandise within the scope of these investigations as follows:

The merchandise covered by these investigations is prestressed concrete steel wire strand (PC strand), produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications. The product definition encompasses covered and uncovered strand and all types, grades, and diameters of PC strand. PC strand is normally sold in the United States in sizes ranging from 0.25 inches to 0.70 inches in diameter. PC strand made from galvanized wire is only excluded from the scope if the zinc and/or zinc oxide coating meets or exceeds the 0.40 oz./ft<sup>2</sup> standard set forth in ASTM-A-475.

The PC strand subject to these investigations is currently classifiable under subheadings 7312.10.3010 and 7312.10.3012 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations is dispositive.<sup>17</sup>

PC strand consists of multiple steel wires wound together to produce a strong, flexible product that is used to strengthen concrete structures. PC strand is used in the construction of prestressed concrete structural components to introduce compression into the concrete. Typical applications of prestressed concrete include bridge decks, bridge girders, pilings, precast

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<sup>15</sup> See, e.g., *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 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.”).

<sup>16</sup> See, e.g., *Pure Magnesium from China and Israel*, Inv. Nos. 701-TA-403 and 731-TA-895-96 (Final), USITC Pub. 3467 at 8 n.34 (Nov. 2001); *Torrington*, 747 F. Supp. at 748-49 (holding that the Commission is not legally required to limit the domestic like product to the product advocated by the petitioner, coextensive with the scope).

<sup>17</sup> *Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, the Republic of Turkey, Ukraine, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations*, 85 Fed. Reg. 28605, 28610 (May 13, 2020); *Prestressed Concrete Steel Wire Strand from the Republic of Turkey: Initiation of Countervailing Duty Investigations*, 85 Fed. Reg. 28610, 28613 (May 13, 2020). These two HTS subheadings may include some out-of-scope merchandise, including out-of-scope galvanized steel wire strand. The amount of out-of-scope merchandise contained in these subheadings will be evaluated in any final phase of these investigations.

concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations, as well as parking garages.<sup>18</sup>

PC strand may be pre-tensioned or post-tensioned. Pre-tensioned prestressed concrete depends upon the bond between the concrete and the PC strand to hold the concrete in compression. Pre-tensioned concrete components may be used in balconies, lintels, floor slabs, beams, or foundation piles. For post-tensioned PC strand, there is no bond between the PC strand and the cured concrete. Instead, the PC strand is tensioned using a calibrated tensioning apparatus after the concrete has cured, and tension is maintained by installing permanent mechanical anchors that remain in place after the tensioning apparatus is removed. Unlike pre-tensioning, which is largely performed at precast manufacturing facilities, post-tensioning takes place on the job site in cast-in-place applications. The predominant end uses of post-tensioned PC strand are in slab-on-grade construction and in buildings for floors with moderate-to-long spans and moderate floor loads such as in parking garages and residential buildings.<sup>19</sup>

#### **A. Arguments of the Parties**

*Petitioners' Argument.* Petitioners argue that the Commission should define a single domestic like product consisting of PC strand that is coextensive with the scope. They contend that PC strand comprises a continuum of a single product with no clear dividing lines. They assert that the scope in these investigations is identical to the scope in prior PC strand investigations in which the Commission defined a single domestic like product, and that there have been no significant changes in the production, uses, or sales conditions with respect to PC strand that would warrant a different result in these investigations.<sup>20</sup> To the extent that interchangeability may be limited between PC strand products of different dimensions, configurations, grades, or coated versus uncoated status, they contend that such minor variations are consistent with product types along a continuum within a single domestic like product. Petitioners contend that all PC strand is sold within a reasonable range of prices, and that while certain coated and other specialty PC strand products may command slightly higher prices, that differentiation is consistent with a continuum of products that includes specialty types. Moreover, they state that most PC strand sold to purchasers is uncoated and of a common size and grade and is thus similarly priced.<sup>21</sup>

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<sup>18</sup> CR/PR at I-8 to I-9.

<sup>19</sup> CR/PR at I-9.

<sup>20</sup> Petitioners' Postconference Brief at 3-7; see *Prestressed Concrete Steel Wire Strand from China*, Inv. Nos. 701-TA-464 and 731-TA-1160 (Final), USITC Pub. 4162 at 5-7 (June 2010); *Prestressed Concrete Steel Wire Strand from Brazil, India, Korea, Mexico and Thailand*, Inv. Nos. 701-TA-432 and 731-TA-1024-1028 (Final), USITC Pub. 3663 at 5-10 (Jan. 2004).

<sup>21</sup> Petitioners' Postconference Brief at 5-7.

*Respondents' Argument.* No respondent party contests petitioners' proposed definition of the domestic like product for purposes of the preliminary phase of these investigations.<sup>22</sup>

## **B. Analysis**

Based on the record, we define a single domestic like product that is coextensive with the scope consisting of PC strand.

*Physical Characteristics and Uses.* All PC strand has the same basic physical characteristics. It is a stranded wire product comprised of carbon steel wires wound helically around a core wire. While PC strand is produced in several different dimensions and grades, the vast majority of PC strand sold in the United States is a seven-wire strand configuration, 0.5-inch in diameter, grade 270K. Regardless of the dimension or grade, all PC strand serves the same purpose, which is to impart compression into concrete structures to prevent cracking.<sup>23</sup>

*Manufacturing Facilities, Production Processes, and Employees.* The same basic production process is used by all domestic producers of PC strand: carbon wire rod is drawn into wire, stranded in a stranding machine, heat treated, and coiled or spooled. All PC strand is made using this same manufacturing process and the same equipment; this equipment or process is not used to produce other products.<sup>24</sup>

*Channels of Distribution.* Almost all domestically produced PC strand is sold directly to end users.<sup>25</sup>

*Interchangeability.* PC strand is generally an interchangeable product because it has the same basic physical characteristics and is produced to comply with ASTM specifications for various PC strand product types.<sup>26</sup> Joint Respondents state that they agree with petitioners that “generally speaking, PC strand of a specific size and type is frequently interchangeable ...”.<sup>27</sup>

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<sup>22</sup> Joint Respondents' Postconference Brief at 2; Joint Respondents' Opening Remarks at 2; Stalkanat's Postconference Brief at 2.

<sup>23</sup> Conference Testimony of Jon Cornelius at 2; Conference Testimony of H.O. Woltz III at 2-3; Conference Testimony of Jordi Barrenechea at 1; Petitioners' Postconference Brief at Exh. 3, Declaration of Jon Cornelius, at Paragraph 4; CR/PR at I-8 to I-10.

<sup>24</sup> Conference Testimony of Jon Cornelius at 2; Petitioners' Postconference Brief at Exh. 3, Declaration of Jon Cornelius, at Paragraph 4; CR/PR at I-10 to I-11.

<sup>25</sup> CR/PR at II-2. \*\*\* percent of U.S. producers' sales were made to distributors in each year of the 2017 to 2019 period of investigation (“POI”). *Id* at II-2 n.2.

<sup>26</sup> Conference Testimony of Jon Cornelius at 1-2; Conference Testimony of H.O. Woltz III at 2-3; Conference Testimony of Jordi Barrenechea at 1-2; Petitioners' Postconference Brief at Exh. 2, Declaration of H.O. Woltz III at Paragraph 5, and Exh. 3, Declaration of Jon Cornelius, at Paragraphs 4-5.

<sup>27</sup> Joint Respondents' Postconference Brief, Response to Staff Questions, at 9.

*Producer and Customer Perceptions.* The limited information in the record indicates that producers and customers perceive PC strand to be a discrete product.<sup>28</sup>

*Price.* The limited information in the record indicates that all PC strand is sold within a reasonable range of prices, although there may be slightly higher prices for certain coated and other specialty products.<sup>29</sup>

*Conclusion.* The limited information in the record of the preliminary phase of these investigations indicates that all PC strand has the same physical characteristics and serves the same general purpose, although there may be some variations in dimension or grade. All PC strand is manufactured using the same basic process, and is almost entirely sold to end users. In addition, PC strand is generally interchangeable and is perceived to be a discrete product. Accordingly, based on the record, and in the absence of any argument to the contrary, we define a single domestic like product that is coextensive with the scope, consisting of PC strand.

#### **IV. 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.”<sup>30</sup> 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.<sup>31</sup>

These investigations do not raise any related parties or other domestic industry issues. No domestic producer imported (or purchased) subject merchandise during the POI, or is related to an importer or foreign exporter of subject merchandise.<sup>32</sup>

Accordingly, we define the domestic industry to include all domestic producers of PC strand.

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<sup>28</sup> Petitioners’ Postconference Brief at Exh. 3, Declaration of Jon Cornelius, at Paragraph 4.

<sup>29</sup> Petitioners’ Postconference Brief at 7.

<sup>30</sup> 19 U.S.C. § 1677(4)(A).

<sup>31</sup> Petitioners argue that the domestic industry should be defined as all U.S. producers of PC strand, stating that there is no basis for excluding from the domestic industry any responding U.S. producer of PC strand. Petitioners’ Postconference Brief at 7-8. No respondent party has contested petitioners’ proposed definition of the domestic industry. Joint Respondents’ Opening Remarks at 2; Stalkanat’s Postconference Brief at 2.

<sup>32</sup> CR/PR at III-2, III-10. While one domestic producer, \*\*\* is affiliated with a \*\*\*, through \*\*\*, \*\*\* did not \*\*\*, and thus the related parties provision does not apply to domestic producer \*\*\*. CR/PR at III-10 and Table III-2. See 19 U.S.C. § 1677(4)(B).



## V. Negligible Imports

Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible.<sup>33</sup> The statute further provides that subject imports from a single country which comprise less than 3 percent of total such imports of the product may not be considered negligible if there are several countries subject to investigation with negligible imports and the sum of such imports from all those countries collectively accounts for more than 7 percent of the volume of all such merchandise imported into the United States.<sup>34</sup> Additionally, even if subject imports are found to be negligible for purposes of present material injury, they shall not be treated as negligible for purposes of a threat analysis should the Commission determine that there is a potential that subject imports from the country concerned will imminently account for more than 3 percent of all such merchandise imported into the United States.<sup>35</sup>

### A. Arguments of the Parties

*Petitioners' Arguments.* Petitioners argue that the Commission should find that imports from all 15 subject countries are not negligible. They contend that imports from Colombia, Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Turkey each exceed the 3 percent threshold on an individual country basis. Petitioners recognize that imports from Argentina, Egypt, the Netherlands, Saudi Arabia, Taiwan, the UAE, and Ukraine are below 3 percent on an individual basis, but contend that they collectively exceed seven percent of total imports in the most recent 12 months.<sup>36</sup> In countering respondent assertions that imports below 3 percent are too small to cause injury, petitioners argue that the cumulation provision is designed to address the “hammering” effect of relatively small volumes of imports from multiple countries collectively entering the U.S. market and injuring the domestic industry.<sup>37</sup>

Petitioners also state that there is no evidence to support Maadinayah’s contention that official import statistics for the subject countries under the two relevant HTS numbers may include imports of out-of-scope merchandise. To the contrary, petitioners assert that where the Commission has received comprehensive questionnaire responses covering all imports from

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<sup>33</sup> 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B); *see also* 15 C.F.R. § 2013.1 (developing countries for purposes of 19 U.S.C. § 1677(36)).

<sup>34</sup> 19 U.S.C. § 1677(24)(A)(ii).

<sup>35</sup> 19 U.S.C. § 1677(24)(A)(iv).

<sup>36</sup> Petitioners’ Postconference Brief at 21-22.

<sup>37</sup> Petitioners’ Postconference Brief at 22-23.

a subject country, those questionnaire responses indicate that the official import statistics for that country do not contain imports of out-of-scope merchandise.<sup>38</sup>

*Respondents' Arguments.* Several respondent parties -- Egyptian producer UWE and the Government of Egypt; Taiwanese producer Chia Ta; Ukrainian producer Stalkanat and the Ukraine Trade Ministry -- argue that imports from their particular country source accounted for less than 3 percent of total imports during the relevant period, that there is no potential that imports from the country source concerned will imminently account for more than 3 percent, and that those imports are not individually injurious or threatening to the domestic industry. They contend that the Commission should accordingly find that imports from such sources (Egypt, Taiwan, and Ukraine) are negligible.<sup>39</sup> UWE and Stalkanat also argue that imports from Saudi Arabia will imminently account for more than 3 percent of total imports, and accordingly should not be included in the aggregation of countries that are individually below the 3 percent threshold. They assert that, once imports from Saudi Arabia are removed, aggregate subject imports from the remaining six sources (Argentina, Egypt, the Netherlands, Taiwan, Ukraine, and the UAE) fall below the 7 percent threshold, and are thus negligible.<sup>40</sup>

Maadaniyah argues that the official import statistics for PC strand are overbroad and include imports of out-of-scope merchandise and thus are unreliable for determining negligibility.<sup>41</sup> It contends that the Commission should make its determination on negligibility in the final phase on the basis of importer questionnaire data containing only in-scope merchandise, but that those questionnaire data are currently incomplete. Maadaniyah asserts that data indicate that imports from Saudi Arabia appear to be negligible, but the record is too incomplete for the Commission to make a conclusive determination of negligibility at this stage.<sup>42</sup>

## **B. Analysis**

As we explain below, we find that subject imports are not negligible in any of the antidumping or countervailing duty investigations.<sup>43</sup>

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<sup>38</sup> Petitioners' Postconference Brief at 22 n.16.

<sup>39</sup> UWE's Postconference Brief at 1-2, 4; the Government of Egypt's Opening Remarks at 3-4; Joint Respondents' Postconference Brief at 10-12; Stalkanat's Postconference Brief at 17-21; the Ukraine Trade Ministry's Postconference Brief at 8-12.

<sup>40</sup> UWE's Postconference Brief at 2-4; Stalkanat's Postconference Brief at 19-21. Joint Respondents state that they incorporate by reference the negligibility argument of the Egyptian respondents. Joint Respondents' Postconference Brief at 11.

<sup>41</sup> Maadaniyah's Postconference Brief at 2-4.

<sup>42</sup> Maadaniyah's Postconference Brief at 1, 4-7.

<sup>43</sup> There are antidumping duty investigations on imports from all 15 subject countries and a countervailing duty investigation on imports from Turkey. The subject import volumes are the same in the countervailing duty investigation and the antidumping duty investigation for imports from Turkey,

For purposes of these preliminary determinations, we conduct our negligibility analysis on the basis of official import statistics, given the incompleteness of the Commission's importer questionnaire data and the absence of any party argument that the Commission should rely on questionnaire data for its negligibility analysis in the preliminary phase of these investigations.<sup>44</sup>

We observe that imports from eight of the 15 subject countries are above the 3 percent statutory negligibility threshold. These subject countries, and their percentages of total imports for April 2019 through March 2020, the 12-month period preceding the filing of the petitions, are as follows: Colombia (6.7 percent), Indonesia (3.2 percent), Italy (7.6 percent), Malaysia (22.0 percent), South Africa (6.4 percent), Spain (14.3 percent), Tunisia (7.7 percent), and Turkey (11.6 percent).<sup>45</sup> Accordingly, we find that imports from these eight subject countries are not negligible for purposes of the antidumping investigations on PC strand from the aforementioned countries and the countervailing duty investigation on PC strand from Turkey.

Imports from seven of the 15 subject countries are below the 3 percent individual subject country statutory negligibility threshold applicable to antidumping duty investigations, and none of these subject countries involve countervailing duty investigations. These subject countries, and their percentages of total imports for April 2019 through March 2020, are as follows: Argentina (1.1 percent), Egypt (0.5 percent), the Netherlands (1.0 percent), Saudi Arabia (2.2 percent), Taiwan (2.1 percent), Ukraine (1.0 percent), and the UAE (1.0 percent).<sup>46</sup> The aggregate percentage of total imports from these seven countries is 9.0 percent.<sup>47</sup> Because this exceeds the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources, we find that subject imports are not negligible for purposes of the antidumping duty investigations on imports of PC strand from Argentina, Egypt, the Netherlands, Saudi Arabia, Taiwan, Ukraine, and the UAE. Thus, we find that subject imports are not negligible in all of the subject investigations.

As noted, several respondent parties have urged the Commission to find there is a potential that subject imports from Saudi Arabia will imminently account for more than 3 percent of all PC strand imported into the United States. They contend that on this basis imports from Saudi Arabia would not be individually negligible and could no longer be aggregated with imports from Argentina, Egypt, the Netherlands, Taiwan, Ukraine, and the UAE

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and the countervailing duty investigation does not involve a developing country for which the 4 percent threshold would apply. *See Designations of Developing and Least-Developed Countries Under the Countervailing Duty Law*, 85 Fed. Reg. 7613, 7615-16 (USTR Feb. 10, 2020).

<sup>44</sup> See CR/PR at IV-1. See Petitioners' Postconference Brief, Ex. 1, Response to Staff Questions, at 18-19; Joint Respondents' Postconference Brief, Response to Staff Questions, at 19; Maadaniyah's Postconference Brief at 4-7.

<sup>45</sup> CR/PR at Table IV-3. Table IV-3 is based on official import statistics.

<sup>46</sup> CR/PR at Table IV-3.

<sup>47</sup> CR/PR at Table IV-3.

for purposes of the 7 percent statutory threshold pertinent to aggregated imports from individually negligible sources. Under their proposed approach, the aggregate percentage of total imports from the remaining six countries would be lower than the 7 percent statutory threshold, leaving imports from those six countries negligible.<sup>48</sup>

The respondents' proposed approach ignores the fact that the statute requires the Commission to first consider negligibility in the context of present material injury. The Commission only looks at whether subject imports from a subject country will imminently account for more than 3 percent of total imports for purposes of its analysis of threat of material injury after it has determined that imports from the subject country in question are negligible for purposes of its analysis of present material injury. Here, as noted above, we have found that imports from Saudi Arabia are not negligible for purposes of our present material injury analysis, pursuant to the statutory provision with a 7 percent threshold for aggregated imports from individually negligible sources. Accordingly, there is no basis for the Commission to conduct a threat of material injury negligibility analysis with respect to imports from Saudi Arabia. The statute does not contemplate that the Commission is free to skip the aggregated portion of the present material injury analysis for any individually negligible country source, consider the threat analysis of whether that individual source will imminently account for more than 3 percent, and then return to the present material injury aggregated analysis for the remaining individually negligible country sources with that source now excluded from the aggregation. The statute clearly requires the individual and aggregation analyses for the present material injury negligibility analysis, and any negligibility analysis for threat purposes is appropriate only if both findings of the Commission's present material injury negligibility analysis show that imports from a particular country source are negligible.

## **VI. Cumulation**

For purposes of evaluating the volume and effects for a determination of reasonable indication of material injury by reason of subject imports, section 771(7)(G)(i) of the Tariff Act requires the Commission to cumulate subject imports from all countries as to which petitions were filed and/or investigations self-initiated by Commerce on the same day, if such imports compete with each other and with the domestic like product in the U.S. market. In assessing whether subject imports compete with each other and with the domestic like product, the Commission generally has considered four factors:

- (1) the degree of fungibility between subject imports from different countries and between subject imports and the domestic like product, including

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<sup>48</sup> UWE's Postconference Brief at 2-4; Stalkanat's Postconference Brief at 19-21; see Joint Respondents' Postconference Brief at 11.

consideration of specific customer requirements and other quality related questions;

- (2) the presence of sales or offers to sell in the same geographic markets of subject imports from different countries and the domestic like product;
- (3) the existence of common or similar channels of distribution for subject imports from different countries and the domestic like product; and
- (4) whether the subject imports are simultaneously present in the market.<sup>49</sup>

While no single factor is necessarily determinative, and the list of factors is not exclusive, these factors are intended to provide the Commission with a framework for determining whether the subject imports compete with each other and with the domestic like product.<sup>50</sup> Only a “reasonable overlap” of competition is required.<sup>51</sup>

#### **A. Arguments of the Parties**

Petitioners argue that cumulation of imports from all 15 subject sources is mandatory for the Commission’s analysis of present material injury, asserting that there is a reasonable overlap of competition between and among subject imports from all 15 countries and the domestic like product. They contend that domestic and imported PC strand from each of the subject countries are fungible products that are produced to standard industry specifications and compete directly against one another. They assert that imports from the subject countries and the domestic like product serve overlapping geographic markets within the United States, are sold through the same distribution channel, to end users, and were simultaneously present in the U.S. market throughout the POI, and in particular in 2019.<sup>52</sup>

Joint Respondents argue that subject imports from Taiwan, Italy, and Argentina should not be cumulated with subject imports from any other sources due to a lack of a reasonable

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<sup>49</sup> See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-80 (Final), USITC Pub. 1845 (May 1986), *aff’d*, *Fundicao Tupy, S.A. v. United States*, 678 F. Supp. 898 (Ct. Int’l Trade), *aff’d*, 859 F.2d 915 (Fed. Cir. 1988).

<sup>50</sup> See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

<sup>51</sup> The Statement of Administrative Action (SAA) to the Uruguay Round Agreements Act (URAA), expressly states that “the new section will not affect current Commission practice under which the statutory requirement is satisfied if there is a reasonable overlap of competition.” H.R. Rep. No. 103-316, Vol. I at 848 (1994) (*citing Fundicao Tupy*, 678 F. Supp. at 902); see *Goss Graphic Sys., Inc. v. United States*, 33 F. Supp. 2d 1082, 1087 (Ct. Int’l Trade 1998) (“cumulation does not require two products to be highly fungible”); *Wieland Werke, AG*, 718 F. Supp. at 52 (“Completely overlapping markets are not required.”).

<sup>52</sup> Petitioners’ Postconference Brief at 8-13 and Exh. 1, Response to Staff Questions, at 22-24.

overlap of competition with the domestic like product.<sup>53</sup> They argue that there is limited geographic overlap between the domestic like product and subject imports from Taiwan and Italy, both of which they contend were present only in certain U.S. geographic regions during the POI.<sup>54</sup> Furthermore, Joint Respondents argue that subject imports from Taiwan and Italy are not fungible with the domestic like product given differences in end-use market segments with respect to the pre-tension and post-tension segments of the U.S. market.<sup>55</sup>

Stalkanat argues that subject imports from Ukraine should not be cumulated with subject imports from any other sources due to a lack of a reasonable overlap of competition with the domestic like product. It contends that fungibility is lacking as indicated by purchaser responses indicating limited interchangeability and limited competition between subject imports from Ukraine and the domestic like product. Stalkanat argues that there is no overlap in channels of distribution, stating that subject imports from Ukraine are sold to brokers and distributors to be resold to end users, while the domestic like product is sold only to end users. Stalkanat further asserts that subject imports from Ukraine have been limited to one geographic region in the United States, and were absent from the U.S. market in almost half of the months during the POI, indicating the absence of both geographic overlap and simultaneous presence in the market.<sup>56</sup>

## **B. Analysis**

We consider subject imports from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and the UAE on a cumulated basis, because the statutory criteria for cumulation are satisfied. As an initial matter, petitioners filed the antidumping/countervailing duty petitions with respect to all 15 countries on the same day, April 16, 2020.<sup>57</sup>

*Fungibility.* All U.S. producers reported that the domestic like product and subject imports from all 15 subject countries are “always” interchangeable.<sup>58</sup> Responding U.S. importers had more mixed assessments of the interchangeability of the domestic like product and subject imports, although there were relatively few (between one and four) responding importers for these comparisons. Majorities of responding importers reported that the domestic like product was “always” or “frequently” interchangeable with subject imports from Argentina, Egypt, Italy, the Netherlands, South Africa, Spain, Taiwan, and Turkey, while

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<sup>53</sup> Joint Respondents’ Postconference Brief, Response to Staff Questions, at 18-19.

<sup>54</sup> Joint Respondents’ Postconference Brief at 34-36.

<sup>55</sup> Joint Respondents’ Postconference Brief at 36-37.

<sup>56</sup> Stalkanat’s Postconference Brief at 6-12.

<sup>57</sup> None of the statutory exceptions to cumulation applies.

<sup>58</sup> CR/PR at Table II-5.

majorities reported that the domestic like product was only “sometimes” interchangeable with subject imports from Indonesia, Malaysia, Saudi Arabia, Tunisia, Ukraine, and the UAE, and two responding importers were equally divided between reporting that the domestic like product and subject imports from Colombia were “always” interchangeable and reporting that they were “sometimes” interchangeable.<sup>59</sup>

All U.S. producers reported that the subject imports from all 15 subject countries were “always” interchangeable with each other in all comparisons of country pairs.<sup>60</sup> Responding U.S. importers had mixed assessments of the interchangeability of the various country pairs among the subject imports. Most reported that that these subject country pairs were “sometimes” interchangeable or that they were “always” and/or “frequently” interchangeable, although there were very few (only one or two) responding importers for these subject country pair comparisons and no two importers agreed on the assessment of any of the subject country pairs.<sup>61</sup> Additionally, Joint Respondents state that they agree with petitioners that “{g}enerally speaking, PC strand of a specific size and type is frequently interchangeable.”<sup>62</sup>

As explained above, Joint Respondents argue that the domestic like product and subject imports from Taiwan and Italy are not fungible based on a difference between their end-use market segments: pre-tension applications versus post-tension applications.<sup>63</sup> The record indicates that while a majority of U.S. producers’ U.S. shipments went to pre-tension applications, a substantial percentage also went to post-tension applications.<sup>64</sup> A substantial majority of imports from \*\*\* of the 13 subject countries for which such data are available went to post-tension applications during the POI.<sup>65</sup> Thus, while the record indicates a somewhat different emphasis between domestic producers and subject producers, it also indicates substantial overlap between the domestic like product and subject imports from those 13 countries in shipments to post-tension end-use applications.

The Commission’s pricing data reflect that the domestic industry and subject imports from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, South Africa, Taiwan, Tunisia, Turkey, and Ukraine all reported sales of pricing product 1 during the POI, indicating that the

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<sup>59</sup> CR/PR at Table II-5.

<sup>60</sup> CR/PR at Table D-1.

<sup>61</sup> CR/PR at Table D-1.

<sup>62</sup> Joint Respondents’ Postconference Brief, Response to Staff Questions, at 9.

<sup>63</sup> Joint Respondents’ Postconference Brief at 36-37.

<sup>64</sup> The percentage of U.S. producers’ U.S. shipments that went to pre-tension applications was \*\*\* percent in 2017, \*\*\* percent in 2018, and \*\*\* percent in 2019, while the percentage that went to post-tension applications was \*\*\* percent in 2017, \*\*\* percent in 2018, and \*\*\* percent in 2019. CR/PR at Tables II-1, IV-5.

<sup>65</sup> Substantial majorities of subject imports from \*\*\* went to post-tension uses during the POI. CR/PR at Tables II-1, IV-5. Such data are not available for subject imports from \*\*\*. *Id.*

domestic like product and subject imports from these 11 subject countries were competing for sales of product 1 in the U.S. market.<sup>66</sup> In addition, purchasers responding to the Commission's lost sales/lost revenue survey reported switching from purchasing the domestic like product to purchasing subject imports from 12 of the 15 subject countries: Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Tunisia, Turkey, and the UAE, again indicating competition between the domestic like product and subject imports from these subject countries.<sup>67</sup>

*Channels of Distribution.* U.S. producers and importers of subject merchandise sold almost all of their PC strand to end users during 2017-19.<sup>68</sup>

*Geographic Overlap.* U.S. producers sold the domestic like product in every region in the United States.<sup>69</sup> Responding U.S. importers provided information regarding sales to particular U.S. geographic regions for imports from 11 of the 15 subject countries.<sup>70</sup> Of those 11 subject countries, subject imports from 10 of them (all but Indonesia) were sold in the Central Southwest region, while imports from eight subject countries were sold in the Southeast region, imports from seven subject countries were sold in the Pacific Coast regions, and imports from five subject countries were sold in the Mountains region.<sup>71</sup> Imports from 14 of the 15 subject countries were reported as entering the United States through customs entry districts in the Southern border region.<sup>72</sup> Thus, evidence available in the preliminary phase of these investigations indicates a reasonable geographic overlap between the domestic like

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<sup>66</sup> CR/PR at Table V-3. No pricing data for product 1 were reported as to imports from the Netherlands, Saudi Arabia, Spain, and the UAE. CR/PR at V-5.

<sup>67</sup> CR/PR at Table V-10.

<sup>68</sup> U.S. producer sales to distributors were \*\*\* percent of sales in each year. U.S. importers of PC strand from \*\*\* were the only importers of subject merchandise reporting any sales to distributors. CR/PR at II-2 and n.2. Despite Stalkanat's contention, the record does not indicate that subject imports from Ukraine were sold through different channels of distribution from those of the domestic like product and imports from other subject sources, as \*\*\* reported that subject imports from Ukraine were sold to distributors. *Id.* at II-2.

<sup>69</sup> CR/PR at Table II-2.

<sup>70</sup> No importer provided geographic sales information with respect to imports from the Netherlands, Saudi Arabia, Spain, or the UAE. CR/PR at Table II-2.

<sup>71</sup> Subject Imports from Argentina, Colombia, Egypt, Italy, Malaysia, South Africa, Taiwan, Tunisia, Turkey and Ukraine were sold in the Central Southwest region. Subject imports from Argentina, Colombia, Egypt, Italy, Malaysia, Spain, Tunisia, and Turkey were sold in the Southeast region. Subject imports from Colombia, Indonesia, Italy, Malaysia, Taiwan, Tunisia, and Turkey were sold in the Pacific Coast region. Subject imports from Argentina, Colombia, Indonesia, Italy, and Malaysia were sold in the Mountains region. CR/PR at Table II-2.

<sup>72</sup> CR/PR at Table IV-6. The one exception was subject imports from Taiwan, which entered the United States through customs entry districts in the Western border region. *Id.*



product and subject imports from almost all countries, and among subject imports from almost all countries, for which data are available.

*Simultaneous Presence in the Market.* The domestic like product was present in the U.S. market throughout the POI.<sup>73</sup> Of the 15 subject countries, official imports statistics indicate that subject imports from five countries were present in the U.S. market in all, or all but one, of the 39 months in the period January 2017 through March 2020.<sup>74</sup> Subject imports from an additional seven countries were present in the U.S. market for a majority of those 39 months.<sup>75</sup> Subject imports from three countries were present in the U.S. market for less than half of those 39 months: subject imports from Argentina and the UAE for 11 months, and subject imports from Egypt for 5 months (first entering the U.S. market in May 2019).<sup>76</sup> Subject imports from all 15 subject countries were present in the U.S. market in 2019.<sup>77</sup>

*Conclusion.* The record in the preliminary phase of these investigations has substantial limitations, given the gaps in the data set with respect to imports from some of the 15 subject countries, and the limitations of U.S. importer responses on interchangeability with a very small number of importers responding for most country comparisons. Nevertheless, the data establish a sufficient degree of fungibility between and among subject imports from all sources and the domestic like product for finding a reasonable overlap of competition. In particular, there is general interchangeability of PC strand, substantial overlap in sales to post-tension end uses of the domestic like product and subject imports from the 13 subject countries for which such data are available, the pricing and lost sales data indicate competition between the domestic like product and subject imports from almost all of the subject countries, and the record does not indicate that imports from the subject countries for which data are lacking are not fungible with the other subject imports and the domestic like product.

In addition, there is an overlap between the domestic like product and subject imports from almost all subject countries in channels of distribution in sales to end users. The record indicates reasonable geographic overlap between and among subject imports from almost all subject countries for which geographic data are available and the domestic like product. The

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<sup>73</sup> CR/PR at Table V-3.

<sup>74</sup> Subject Imports from Malaysia and Turkey were present in the U.S. market in all 39 months, while subject imports from Colombia, Italy, and Spain were present in 38 of 39 months. CR/PR at Table IV-7.

<sup>75</sup> Subject imports from Tunisia were present in the U.S. market for 35 months; subject imports from the Netherlands for 33 months; subject imports from South Africa for 30 months; subject imports from Taiwan for 28 months; subject imports from Indonesia for 25 months; subject imports from Saudi Arabia for 23 months; and subject imports from Ukraine for 22 months. CR/PR at Table IV-7.

<sup>76</sup> CR/PR at Table IV-7.

<sup>77</sup> CR/PR at Table IV-7.

domestic like product and subject imports from all sources were simultaneously present in the U.S. market in 2019.

Accordingly, we consider subject imports from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and the UAE on a cumulated basis for our analysis of whether there is a reasonable indication of material injury by reason of subject imports.

## **VII. Reasonable Indication of Material Injury by Reason of Subject Imports**

### **A. Legal Standard**

In the preliminary phase of antidumping and countervailing duty investigations, the Commission determines whether there is a reasonable indication that an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>78</sup> 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 like product, but only in the context of U.S. production operations.<sup>79</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>80</sup> In assessing whether there is a reasonable indication that 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.<sup>81</sup> 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.”<sup>82</sup>

Although the statute requires the Commission to determine whether there is a reasonable indication that the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,<sup>83</sup> 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.<sup>84</sup> In identifying a causal link, if any, between subject imports and

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<sup>78</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>79</sup> 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).

<sup>80</sup> 19 U.S.C. § 1677(7)(A).

<sup>81</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>82</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>83</sup> 19 U.S.C. §§ 1671b(a), 1673b(a).

<sup>84</sup> *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).

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 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.<sup>85</sup>

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.<sup>86</sup> In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.<sup>87</sup> Nor does the

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<sup>85</sup> 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).

<sup>86</sup> 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.

<sup>87</sup> 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 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

“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.<sup>88</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>89</sup>

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.”<sup>90</sup> 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 sources to the subject imports.”<sup>91</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>92</sup>

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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.”).

<sup>88</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>89</sup> *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.”).

<sup>90</sup> *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 *Swift-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*.

<sup>91</sup> *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.

<sup>92</sup> *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.”).

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.<sup>93</sup> Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.<sup>94</sup>

## **B. Conditions of Competition and the Business Cycle**

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

### **1. Demand Conditions**

U.S. demand for PC strand depends on the demand for U.S.-produced downstream products in which it is used. PC strand is used in the construction of prestressed concrete structural members, which are used in the construction of buildings, bridges, parking decks, garages, highways, and slabs for residences. Therefore, demand for PC strand is derived from the demand for construction, including infrastructure projects, commercial and institutional construction, large housing projects, and single-family housing.<sup>95</sup> Private residential construction, private nonresidential construction, and public construction all increased during the POI.<sup>96</sup> Most U.S. producers reported that U.S. demand increased during the POI, while most importers reported that U.S. demand was unchanged or had fluctuated.<sup>97</sup>

Apparent U.S. consumption increased by 0.8 percent between 2017 and 2019, increasing from 946.7 million pounds in 2017 to 984.7 million pounds in 2018, and then declining to 954.5 million pounds in 2019.<sup>98</sup>

### **2. Supply Conditions**

There are five known U.S. producers in the domestic industry, with \*\*\*, at \*\*\* percent, and \*\*\*, at \*\*\* percent, accounting for the largest shares of U.S. production in 2019.<sup>99</sup> The domestic industry’s capacity increased by 9.5 percent between 2017 and 2019, increasing from 1.0 billion pounds in 2017 and 2018 to 1.1 billion pounds in 2019, reflecting capacity added by

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<sup>93</sup> We provide in our discussion below an analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>94</sup> *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.”).

<sup>95</sup> CR/PR at II-7 to II-8.

<sup>96</sup> CR/PR at II-8 and Figure II-1.

<sup>97</sup> CR/PR at Table II-4.

<sup>98</sup> CR/PR at Tables IV-8, C-1.

<sup>99</sup> CR/PR at Table III-1.

\*\*\*.<sup>100</sup> In 2017, Sumiden began production at a new greenfield PC strand plant in Dayton, Texas.<sup>101</sup> In 2018, WMC announced its plan to open a new PC strand production line in its plant in Conroe, Texas, which it completed in 2019; WMC's representative testified that it has been unable to use this added capacity.<sup>102</sup> In March 2020, Insteel announced its acquisition of Strand-Tech Manufacturing, Inc.'s PC strand business, including its production facility in Summerville, South Carolina; Insteel is now in the process of closing that facility and moving its equipment to other Insteel facilities.<sup>103</sup>

The domestic industry's market share increased from 70.3 percent of apparent U.S. consumption in 2017 to 71.0 percent in 2018, and then declined to 67.2 percent in 2019.<sup>104</sup>

The market share of cumulated subject imports was 25.1 percent of apparent U.S. consumption in 2017 and 25.0 percent in 2018, and then increased to 29.4 percent in 2019.<sup>105</sup>

The market share of nonsubject imports declined from 4.5 percent of apparent U.S. consumption in 2017 to 4.0 percent in 2018 and 3.5 percent in 2019.<sup>106</sup> The largest source of nonsubject imports during the POI was Portugal, which accounted for 87.0 percent of nonsubject imports in 2019.<sup>107</sup>

### **3. Substitutability and Other Conditions**

We find that there is a moderate-to-high degree of substitutability between domestically produced PC strand and PC strand imported from subject sources.<sup>108</sup> The four responding US producers reported that domestically produced PC strand and subject imports from all 15 sources are "always" interchangeable, while the few responding importers provided mixed responses as to whether PC strand from different sources is "always" or "frequently" interchangeable or only "sometimes" interchangeable.<sup>109</sup> As previously noted, Joint Respondents agree with petitioners that, as a general matter, PC strand of a specific size and type is frequently interchangeable.<sup>110</sup>

We recognize that substitutability between domestic product and the subject sources may be reduced somewhat by the prevalence of Buy American provisions in the U.S. market for

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<sup>100</sup> CR/PR at Tables III-5, C-1.

<sup>101</sup> CR/PR at Table III-3.

<sup>102</sup> CR/PR at Tables III-3, III-4; Conference Testimony of Jordi Barrenechea at 3; Petitioners' Postconference Brief at Exh. 4, Declaration of Jordi Barrenechea, at Paragraph 10.

<sup>103</sup> CR/PR at VI-1 n.3; Tables III-3, III-4; Conference Testimony of H.O. Woltz III at 1.

<sup>104</sup> CR/PR at Tables IV-9, C-1.

<sup>105</sup> CR/PR at Tables IV-9, C-1.

<sup>106</sup> CR/PR at Tables IV-9, C-1.

<sup>107</sup> CR/PR at II-7.

<sup>108</sup> CR/PR at II-10.

<sup>109</sup> CR/PR at Table II-5.

<sup>110</sup> Joint Respondents' Postconference Brief, Response to Staff Questions, at 9.

PC strand.<sup>111</sup> Petitioners assert that the majority of the U.S. market is not subject to Buy American provisions, contending that the portion of the market subject to such provisions accounted for approximately \*\*\* percent of total PC strand sales over the POI.<sup>112</sup> Joint Respondents allege that over 30 percent of the U.S. market is subject to Buy American restrictions preventing imports from competing with the domestic industry.<sup>113 114</sup>

Purchasers responding to the Commission’s lost sales/lost revenue survey were asked to identify the most important factors for purchasing decisions with respect to PC strand. All twelve responding purchasers listed price, while nine purchasers listed availability/on time delivery, and seven purchasers listed quality.<sup>115</sup> All four responding US producers reported that nonprice differences are “never” significant in comparisons of domestically produced PC strand and subject imports from all sources, while the few responding importers provided mixed responses as to whether nonprice factors were only “sometimes” significant or were “frequently” or “always” significant in those comparisons.<sup>116</sup> We find that price is an important factor in purchasing decisions for PC strand.

In 2019, 53.5 percent of overall U.S. shipments of PC strand went to pre-tension end uses, while 46.5 percent went to post-tension end uses.<sup>117</sup> As previously discussed, approximately two-thirds (67.3 percent) of U.S. producers’ U.S. shipments in 2019 went to pre-tension end uses, while a substantial share (32.7 percent) went to post-tension end uses.<sup>118</sup> A

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<sup>111</sup> CR/PR at II-10.

<sup>112</sup> Petitioners’ Postconference Brief at 19.

<sup>113</sup> Joint Respondents’ Postconference Brief, Response to Staff Questions, at 20-21. In Joint Respondents’ opening remarks and witness testimony for the conference, they estimated that approximately 50 percent of the U.S. PC strand market was subject to Buy American and/or Department of Transportation requirements preventing the use of imported steel. Opening Remarks of John Gurley at 1; Conference Testimony of Patrick Gregoire at 1.

<sup>114</sup> The parties disagree as to the effect that prices in the non-Buy American portion of the market, which is supplied by subject imports and the domestic industry, have on prices in the part of the market subject to Buy American restrictions, which is supplied only by the domestic industry. Respondents argue that the Buy American part of the U.S. market is a protected market for the domestic industry with substantially higher prices than those in the remainder of the market, and that there is no evidence that prices in the non-Buy American portion of the market affect prices of PC strand sold under Buy American requirements. Joint Respondents’ Postconference Brief at 8-10, 27 and Response to Staff Questions at 21-22. Petitioners argue that low subject import prices in the non-Buy American part of the market have a “ripple effect” driving down prices in the Buy American part of the market, asserting that purchasers in the Buy American part of the market are well aware of prices in the non-Buy American part of the market, and that many purchasers purchase in both parts of the market. Petitioners’ Postconference Brief at 20-21.

<sup>115</sup> CR/PR at II-10.

<sup>116</sup> CR/PR at Table II-6.

<sup>117</sup> CR/PR at Table IV-5.

<sup>118</sup> CR/PR at Table II-1.

large majority (82.3 percent) of U.S. shipments of cumulated subject imports in 2019 went to post-tension end uses, while 17.7 percent went to pre-tension end uses.<sup>119</sup> In 2019, the domestic industry had a dominant share (89.0 percent) of total U.S. shipments to pre-tension applications, while cumulated subject imports accounted for 8.5 percent, and nonsubject imports accounted for 2.5 percent.<sup>120</sup> In the post-tension portion, the domestic industry accounted for slightly less than half (49.7 percent) of total U.S. shipments to post-tension applications in 2019, with cumulated subject imports close behind at 45.4 percent, and nonsubject imports with 4.9 percent.<sup>121</sup>

U.S. producers reported that pricing for their sales was set primarily through transaction-by-transaction negotiations; most importers reported that prices for their sales were set through transaction-by-transaction negotiations and/or contracts.<sup>122</sup> U.S. producers and importers both reported selling most of their PC strand in the U.S. market under short-term contracts, although U.S. producers also sold a sizeable amount of product through spot sales.<sup>123</sup> U.S. producers and importers both reported that their short-term contracts typically have fixed price and quantity provisions, do not allow for price renegotiation, and do not contain indexing provisions for changes in raw material prices.<sup>124</sup>

The principal raw material used to produce PC strand is hot-rolled, high-carbon steel wire rod, which accounted for almost all (99.9 percent) of the unit value of the domestic industry's raw materials in 2019.<sup>125</sup> All five U.S. producers reported purchasing rather than making steel wire rod, although two producers reported purchasing it at fair market value from related entities.<sup>126</sup>

As a percentage of the domestic industry's total cost of goods sold (COGS), raw material costs accounted for 74.7 percent in 2017, 78.9 percent in 2018, and 75.1 percent in 2019.<sup>127</sup> Three responding U.S. producers reported that raw material prices increased during the POI,

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<sup>119</sup> CR/PR at Table II-1.

<sup>120</sup> CR/PR at Table IV-5. Joint Respondents assert that PC strand for pre-tension applications is used in projects subject to Buy American restrictions. Joint Respondents' Postconference Brief at 8.

<sup>121</sup> CR/PR at Table IV-5.

<sup>122</sup> CR/PR at Table V-1.

<sup>123</sup> U.S. producers reported that \*\*\* percent of their U.S. commercial shipments in 2019 were pursuant to short-term contracts, and \*\*\* percent were spot sales. Importers reported that \*\*\* percent of their U.S. commercial shipments in 2019 were pursuant to short-term contracts, and \*\*\* percent were spot sales. CR/PR at Table V-2.

<sup>124</sup> CR/PR at V-4.

<sup>125</sup> CR/PR at V-1 and Table VI-4.

<sup>126</sup> CR/PR at VI-11 n.10 and Table VI-4.

<sup>127</sup> CR/PR at Table VI-1.



while two producers reported that they fluctuated, and a majority of responding importers reported that raw material prices fluctuated over the POI.<sup>128</sup>

Imports of steel wire rod became subject to 25 percent *ad valorem* duties pursuant to section 232 of the Trade Expansion Act of 1962 (the “section 232 tariffs”),<sup>129</sup> beginning in March 2018.<sup>130</sup> Most responding U.S. producers and importers reported that the section 232 tariffs increased raw material prices.<sup>131</sup> However, responding firms were divided on the impact of the section 232 tariffs on PC strand prices.<sup>132</sup> In addition, antidumping and/or countervailing duty orders were imposed in 2018 on imports of steel wire rod from ten countries.<sup>133</sup>

Prices of high carbon steel wire rod fluctuated over the POI.<sup>134</sup> Steel wire rod prices increased sharply in April 2018 after the imposition of the section 232 tariffs. Steel wire rod prices began to decline in April 2019, but were still \*\*\* percent higher in December 2019 than they were in January 2017.<sup>135</sup>

### 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.”<sup>136</sup>

The volume of cumulated subject imports increased by 17.7 percent between 2017 and 2019, increasing from 238.1 million pounds in 2017 to 245.8 million pounds in 2018 and 280.3 million pounds in 2019.<sup>137</sup> These consistent increases in subject import volume occurred despite a decline in apparent U.S. consumption between 2018 and 2019.

The market share of cumulated subject imports was 25.1 percent of apparent U.S. consumption in 2017 and 25.0 percent in 2018, and then increased to 29.4 percent in 2019.<sup>138</sup> As cumulated subject imports gained 4.2 percentage points of market share between 2017 and

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<sup>128</sup> CR/PR at V-1.

<sup>129</sup> 19 U.S.C. § 1862.

<sup>130</sup> CR/PR at V-2 and n.6.

<sup>131</sup> CR/PR at V-2.

<sup>132</sup> CR/PR at V-2 to V-3.

<sup>133</sup> The ten countries were Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, the UAE and the United Kingdom. CR/PR at V-2 n.7.

<sup>134</sup> See CR/PR at Figure V-1.

<sup>135</sup> CR/PR at V-1.

<sup>136</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>137</sup> CR/PR at Tables IV-1, C-1.

<sup>138</sup> CR/PR at Tables IV-9, C-1.

2019, it came directly at the expense of the domestic industry, which lost 3.2 percentage points of market share during the same period.<sup>139</sup>

We find that the volume of cumulated subject imports, and the increase in that volume, are significant in absolute terms and relative to 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 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.<sup>140</sup>

As previously discussed in section V.B.3, we find that the domestic like product and cumulated subject imports have a moderate-to-high degree of substitutability, and that price is an important factor in purchasing decisions for PC strand.

The Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of two PC strand products shipped to unrelated U.S. customers during January 2017 through December 2019.<sup>141</sup> All five U.S. producers and five importers provided usable pricing data for sales of product 1, although not all firms reported pricing data for this product for all quarters, and no firms reported pricing data for product 2 that matched the product description.<sup>142</sup> Pricing data for product 1 reported by these firms accounted for approximately \*\*\* percent of U.S. producers' U.S. shipments of PC strand and \*\*\* percent of U.S. shipments of combined subject imports.<sup>143</sup>

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<sup>139</sup> The domestic industry's market share increased from 70.3 percent in 2017 to 71.0 percent in 2018, and then declined to 67.2 percent in 2019. CR/PR at Tables IV-9, C-1.

<sup>140</sup> 19 U.S.C. § 1677(7)(C)(ii).

<sup>141</sup> CR/PR at V-5. The two pricing products are:

**Product 1.**-- 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand.

**Product 2.**-- 1/2-inch, grade 270 (270,000 PSI), low-relaxation, covered prestressed concrete strand that is greased and covered in a polyethylene wrap. *Id.*

<sup>142</sup> CR/PR at V-5.

<sup>143</sup> The pricing data reported by U.S. importers accounted for the following percentages of U.S. shipments of subject imports in 2019 from the subject countries: Argentina -- \*\*\* percent; Colombia -- \*\*\* percent; Egypt -- \*\*\* percent; Indonesia -- \*\*\* percent; Italy -- \*\*\* percent; Malaysia -- \*\*\* percent; South Africa -- \*\*\* percent; Taiwan -- \*\*\* percent; Tunisia -- \*\*\* percent; Turkey -- \*\*\* percent; and

The pricing data for product 1 show that cumulated subject imports were priced below domestically produced product in 91 of 115 quarterly comparisons, with margins of underselling ranging from 0.0 percent to 14.2 percent, and an average margin of underselling of 4.5 percent.<sup>144</sup> The data also reflect predominant underselling by volume, with 488.6 million pounds of subject imports of PC strand associated with instances of underselling, as compared to 105.5 million pounds of subject imports associated with instances of overselling.<sup>145</sup> Thus, 82.2 percent of the quantity of subject imports covered by the Commission's pricing data was sold during quarters in which the average price of these imports was less than that of the comparable domestic product.

This underselling appears to have fueled cumulated subject imports' growth in volume and contributed to the domestic industry's decline in market share during the POI.<sup>146</sup> Nine purchasers responding to the Commission's lost sales/lost revenue survey reported that they purchased subject imports instead of the domestic like product, and all nine purchasers further reported that subject imports were priced lower than the domestic like product.<sup>147</sup> Moreover, five of these purchases reported that price was a primary reason for their decision to purchase subject imports, and that the quantity of subject imports they purchased was 56.3 million pounds.<sup>148</sup>

Given the moderate-to-high degree of substitutability and the importance of price in purchasing decisions for PC strand, we find this underselling by cumulated subject imports to be significant.

We have also considered price trends during the period of investigation. In general, prices for PC strand in the U.S. market increased during the POI. Prices of domestically produced product 1 increased by \*\*\* percent during the POI, while prices for cumulated

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Ukraine – \*\*\* percent. CR/PR at V-5 to V-6. No pricing data were reported by U.S. importers for imports from the Netherlands, Saudi Arabia, Spain, or the UAE. *Id.* at V-5.

<sup>144</sup> CR/PR at Table V-5. In the third quarter of 2018, U.S. importers reported a price of \$\*\*\* per \$1,000 pounds for subject imports from \*\*\*, while U.S. producers reported a price of \$\*\*\* per \$1,000 pounds, indicating underselling by subject imports by an \*\*\* margin reported as \*\*\* percent. *Id.* at Table V-3.

<sup>145</sup> CR/PR at Table V-5.

<sup>146</sup> *See, e.g.*, CR/PR at Table C-2.

<sup>147</sup> CR/PR at Table V-10. We note further that the average unit value (AUV) for cumulated subject imports was substantially lower than the AUV for U.S. shipments of domestically produced PC strand during the POI. The AUV for cumulated subject imports (in dollars per thousand pounds) was \$348 in 2017, \$449 in 2018, and \$407 in 2019. CR/PR at Tables IV-2, C-1. The AUV for U.S. shipments of domestically produced PC strand (in dollars per thousand pounds) was \$440 in 2017, \$515 in 2018, and \$501 in 2019. CR/PR at Tables III-7, C-1.

<sup>148</sup> CR/PR at Table V-10. This quantity is equivalent to 31.6 percent of purchasers' total reported purchases of subject imports over the POI. *See* CR/PR at Table V-6.

subject imports of product 1 increased by 16.0 percent.<sup>149</sup> U.S. producer prices and import prices of product 1 followed similar trends, steadily increasing through the first quarter of 2018, then increasing sharply after the imposition of the section 232 tariffs in March 2018 and continuing to increase through the end of 2018. Domestic and import prices of product 1 began to decline in the first quarter of 2019 and continued to decline through the end of 2019, though prices still remained higher at the end of 2019 than at the beginning of 2017.<sup>150</sup>

The record indicates that cumulated subject imports suppressed prices of the domestic like product. The domestic industry's ratio of COGS to net sales increased by 9.0 percentage points during the POI, increasing from 88.2 percent in 2017 to 90.0 percent in 2018 and 97.2 percent in 2019.<sup>151</sup> The industry's raw materials unit costs increased (in dollars per thousand pounds) by \$75 over the POI, increasing from \$291 in 2017 to \$367 in 2018 and remaining relatively flat at \$366 in 2019, and total unit COGS increased (in dollars per thousand pounds) by \$99 over the POI, increasing from \$389 in 2017 to \$465 in 2018 and \$488 in 2019.<sup>152</sup> By contrast, the domestic industry's net sales AUV (in dollars per thousand pounds) increased by only \$61 over the POI, increasing from \$441 in 2017 to \$517 in 2018, and then declining to \$502 in 2019.<sup>153</sup> Thus, the domestic industry experienced a cost-price squeeze during the POI, as it was unable to increase its prices by a sufficient amount to cover its increased costs.<sup>154</sup> This occurred as apparent consumption fluctuated somewhat but increased overall between 2017 and 2019, and as a significant and increasing volume of low-priced cumulated subject imports significantly undersold the domestic like product. We consequently find that cumulated subject imports prevented price increases by the domestic industry, which otherwise would have occurred, to a significant degree.

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<sup>149</sup> CR/PR at V-11 and Table V-4.

<sup>150</sup> CR/PR at V-11 and n.16 and Figures V-3 to V-4. AUVs for U.S. shipments of both domestically produced PC strand and cumulated subject imports also increased between 2017 and 2019, although they both were lower in 2019 than in 2018. CR/PR at Table C-1. No purchasers responding to the Commission's lost sales/lost revenue survey reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries. CR/PR at V-16.

<sup>151</sup> CR/PR at Tables VI-1, C-1.

<sup>152</sup> CR/PR at Table VI-1.

<sup>153</sup> CR/PR at Tables VI-1, C-1.

<sup>154</sup> Petitioners presented conference testimony and affidavits from representatives of the petitioning firms (Insteel, Sumiden, and WMC) asserting that these firms attempted to raise their prices to account for their increased raw material costs but customers refused to accept those increases because of subject import competition, or the firms had to lower their prices in response to subject import competition. See Conference Testimony of H.O. Woltz III at 4; Conference Testimony of Jon Cornelius at 3-4; Conference Testimony of Jordi Barrenechea at 3; Petitioners' Postconference Brief at Exh. 2, Declaration of H.O. Woltz III, at Paragraphs 8, 11(a)-11(c) and Attachments 1,2-A-2-C; and Exh. 3, Declaration of Jon Cornelius, at Paragraphs 6, 10(a)-10(d) and Attachments 1, 2A-2D.

We therefore find that the cumulated subject imports had significant adverse price effects.

#### **E. Impact of the Subject Imports<sup>155</sup>**

Section 771(7)(C)(iii) of the Tariff Act provides that the Commission, in examining the impact of the subject imports on the domestic industry, “shall evaluate all relevant economic factors which have a bearing on the state of the industry.” 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 debt, research and development, and factors affecting domestic prices. 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.”<sup>156</sup>

Most of the domestic industry’s performance indicators declined between 2017 and 2019. While a number of its output indicators (production, capacity utilization, net sales quantity, U.S. shipments, and market share) increased between 2017 and 2018, these indicators fell sharply in 2019 to levels below those of 2017 for an overall decline over the POI. The industry’s financial performance declined somewhat between 2017 and 2018, and then declined sharply in 2019 as it experienced operating and net losses.

The domestic industry’s capacity increased from 1.0 billion pounds in 2017 and 2018 to 1.1 billion pounds in 2019.<sup>157</sup> Production declined by 6.4 percent from 2017 to 2019, increasing from 682.2 million pounds in 2017 to 711.1 million pounds in 2018, and then falling to 638.9 million pounds in 2019.<sup>158</sup> Capacity utilization increased from 68.1 percent in 2017 to 68.7

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<sup>155</sup> In its notice initiating the antidumping duty investigations, Commerce reported estimated dumping margins of 60.40 percent for imports from Argentina, 86.09 percent for imports from Colombia, 29.72 percent for imports from Egypt, 72.28 percent for imports from Indonesia, 30.61 percent for imports from Italy, 39.57 percent for imports from Malaysia, 30.86 percent for imports from the Netherlands, 194.40 percent for imports from Saudi Arabia, 155.10 percent for imports from South Africa, 38.57 percent for imports from Spain, 23.89 percent for imports from Taiwan, 53.11 percent for imports from Tunisia, 53.65 percent for imports from Turkey, 17.70 percent and 53.83 percent for imports from Ukraine, and 170.65 percent for imports from the UAE. *Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, the Republic of Turkey, Ukraine, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations*, 85 Fed. Reg. 28605, 28608 (May 13, 2020).

<sup>156</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

<sup>157</sup> CR/PR at Tables III-5, C-1.

<sup>158</sup> CR/PR at Tables III-5, C-1.

percent in 2018, and then fell to 58.3 percent in 2019, a decline of 9.8 percentage points between 2017 and 2019.<sup>159</sup>

After increasing between 2017 and 2018, the industry's net sales quantity, U.S. shipments, and market share declined in 2019 to below 2017 levels. Net sales quantity declined by 4.1 percent from 2017 to 2019, rising from 673.2 million pounds in 2017 to 705.0 million pounds in 2018, and then falling to 645.8 million pounds in 2019.<sup>160</sup> U.S. shipments fell by 3.7 percent from 2017 to 2019, increasing from 665.9 million pounds in 2017 to 699.1 million pounds in 2018, and then declining to 641.2 million pounds in 2019.<sup>161</sup> The domestic industry's share of apparent U.S. consumption rose from 70.3 percent in 2017 to 71.0 percent in 2018, and then fell to 67.2 percent in 2019, for an overall decline of 3.2 percentage points.<sup>162</sup> Ending inventories increased by 1.7 percent from 2017 to 2019, rising from 71.7 million pounds in 2017 to 79.4 million pounds in 2018, and then declining to 72.9 million pounds in 2019.<sup>163</sup>

The domestic industry experienced declines in employment and hours worked during the POI, while wages paid and productivity increased. Employment declined by 8.0 percent from 2017 to 2019, falling from 411 production-related workers (PRWs) in 2017 to 398 PRWs in 2018 and 378 PRWs in 2019.<sup>164</sup> Hours worked declined by 7.0 percent from 2017 to 2019, rising from 953,000 hours in 2017 to 973,000 hours in 2018, and then falling to 886,000 hours in 2019.<sup>165</sup> Wages paid increased by 1.1 percent from 2017 to 2019, rising from \$19.2 million in 2017 to \$20.6 million in 2018, and then declining to \$19.4 million in 2019.<sup>166</sup> Productivity increased by 0.7 percent from 2017 to 2019, rising (in pounds per hour) from 715.9 in 2017 to 731.4 in 2018, and then falling to 721.1 in 2019.<sup>167</sup>

The domestic industry's financial performance sharply declined over the POI as it experienced losses in 2019. While the domestic industry's net sales value increased over the POI, its total COGS increased by a greater amount, and its gross profit sharply declined. Net sales value increased by 9.0 percent from 2017 to 2019, rising from \$297.2 million in 2017 to \$364.2 million in 2018, and then falling to \$324.0 million in 2019.<sup>168</sup> Total COGS increased by 20.2 percent from 2017 to 2019, rising from \$262.1 million in 2017 to \$327.8 million in 2018,

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<sup>159</sup> CR/PR at Tables III-5, C-1.

<sup>160</sup> CR/PR at Tables VI-1, C-1.

<sup>161</sup> CR/PR at Tables III-7, C-1.

<sup>162</sup> CR/PR at Tables IV-9, C-1.

<sup>163</sup> CR/PR at Tables III-8, C-1.

<sup>164</sup> CR/PR at Tables III-9, C-1.

<sup>165</sup> CR/PR at Tables III-9, C-1.

<sup>166</sup> CR/PR at Tables III-9, C-1.

<sup>167</sup> CR/PR at Tables III-9, C-1.

<sup>168</sup> CR/PR at Tables VI-1, C-1.

and then declining to \$314.9 million in 2019.<sup>169</sup> The industry's ratio of COGS to net sales increased from 88.2 percent in 2017 to 90.0 percent in 2018 and 97.2 percent in 2019.<sup>170</sup> Gross profit declined by 74.2 percent from 2017 to 2019, rising from \$35.1 million in 2017 to \$36.4 million in 2018, and then falling to \$9.1 million in 2019.<sup>171</sup>

Operating income declined from \$16.1 million in 2017 to \$15.3 million in 2018, and then became an operating loss of \$8.5 million in 2019.<sup>172</sup> The industry's operating income margin declined from 5.4 percent in 2017 to 4.2 percent in 2018, and then was negative 2.6 percent in 2019.<sup>173</sup> Net income declined from \$14.8 million in 2017 to \$14.0 million in 2018, and then became a net loss of \$9.5 million in 2019.<sup>174</sup> Capital expenditures declined by 62.1 percent between 2017 and 2019, falling from \$36.1 million in 2017 to \$8.4 million in 2018, and then increasing to \$13.7 million in 2019.<sup>175</sup>

The increasing volume of low-priced cumulated subject imports during the POI significantly undersold the domestic industry and took 3.2 percentage points of market share directly at the expense of the domestic industry. As the industry lost market share to subject imports, its output indicators (production, net sales quantity, and U.S. shipments) declined over the POI, and its capacity utilization rate fell by 9.3 percentage points.<sup>176</sup> Moreover, low-priced cumulated subject imports prevented the domestic industry from raising its prices by an amount sufficient to cover its increasing costs, causing a cost-price squeeze for the industry and a substantial deterioration in its financial performance over the POI, leading to operating and net losses in 2019.

In our analysis of the impact of cumulated subject imports on the domestic industry, we have taken into account whether there are other factors that may have had an adverse impact on the industry during the POI to ensure that we are not attributing injury from other factors to cumulated subject imports. In this respect, we have examined the role of nonsubject imports, which had a relatively small and declining presence in the U.S. market over the POI.<sup>177</sup> As previously discussed, all of the domestic industry's decline in market share was lost to subject imports, and none of it was lost to nonsubject imports. Moreover, the available AUV data show

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<sup>169</sup> CR/PR at Tables VI-1, C-1.

<sup>170</sup> CR/PR at Tables VI-1, C-1.

<sup>171</sup> CR/PR at Tables VI-1, C-1.

<sup>172</sup> CR/PR at Tables VI-1, C-1.

<sup>173</sup> CR/PR at Tables VI-1, C-1.

<sup>174</sup> CR/PR at Tables VI-1, C-1.

<sup>175</sup> CR/PR at Tables VI-5, C-1. The domestic industry incurred research and development expenses of \*\*\* in 2017, \*\*\* in 2018, and \*\*\* in 2019. *Id.*

<sup>176</sup> CR/PR at Table C-1.

<sup>177</sup> The market share of nonsubject imports declined from 4.5 percent in 2017 to 4.0 percent in 2018 and 3.5 percent in 2019. CR/PR at Tables IV-9, C-1.

that nonsubject imports had higher AUVs than subject imports throughout the POI.<sup>178</sup> Thus, the small and declining volume of nonsubject imports cannot explain the domestic industry's lost market share or its inability to raise its prices by a sufficient amount to recoup its higher costs from its customers.

We note that Joint Respondents have raised a number of issues that they contend show that any injury to the domestic industry was unrelated to subject imports. They argue that there is limited competition between subject imports and the domestic industry in light of restrictions for imports on Buy American purchases and differing market segments for pre-tension and post-tension products.<sup>179</sup> They also contend that the performance of the domestic industry during the POI was adversely affected by the Section 232 tariffs (and antidumping/countervailing duties) on imports of steel wire rod, raising the industry's raw material costs and affecting its raw material supply; the industry's own investments in additional capacity; price competition between domestic producers; the inability (or unwillingness) of the domestic industry to supply all U.S. customers; adverse market and weather conditions and a decline in U.S. demand in 2019; a temporary overhang of high-priced inventory when PC strand prices declined in 2019; and other conditions unrelated to subject imports.<sup>180</sup> The evidence of record in this preliminary phase of these investigations does not allow for a full evaluation of these various claims. Furthermore, petitioners dispute these various assertions.<sup>181</sup> We intend to explore these issues further in any final phase of these investigations.<sup>182</sup>

For purposes of the preliminary phase of these investigations, we find that the significant volume of low-priced cumulated subject imports, which significantly undersold the domestic like product and suppressed the prices of the domestic industry, had a significant adverse impact on the domestic industry.

## **VIII. Conclusion**

For the reasons stated above, we determine that there is a reasonable indication that an industry in the United States is materially injured by reason of subject imports of PC strand

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<sup>178</sup> The AUV for nonsubject imports (in dollars per thousand pounds) was \$365 in 2017, \$487 in 2018, and \$448 in 2019. CR/PR at Tables IV-2, C-1. The AUV for cumulated subject imports (in dollars per thousand pounds) was \$348 in 2017, \$449 in 2018, and \$407 in 2019. *Id.*

<sup>179</sup> Joint Respondents' Postconference Brief at 8-10, 16-17, 27-28; Conference Testimony of Patrick Gregoire at 1-2; Stalkanat's Postconference Brief at 143-6, 15-16.

<sup>180</sup> Joint Respondents' Postconference Brief at 3-5, 20-25, 28-31, 32-33; Conference Testimony of Patrick Gregoire at 2; Stalkanat's Postconference Brief at 3-6, 15-16.

<sup>181</sup> See Petitioners' Postconference Brief at 34-36 and Exhibit 1, Answers to Staff Questions.

<sup>182</sup> We note that the onset of the COVID-19 pandemic in the United States occurred after the data collection period for the preliminary phase of these investigations and we will consider any effect in any final phase investigations.



from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and the UAE that are allegedly sold in the United States at less than fair value, and imports of the subject merchandise from Turkey that are allegedly subsidized by the government of Turkey.



# 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 Insteel Wire Products Company (“Insteel”), Mount Airy, North Carolina, Sumiden Wire Products Corporation (“Sumiden”), Dickson, Tennessee, and Wire Mesh Corporation (“WMC”), Houston, Texas, on April 16, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of prestressed concrete steel wire strand (“PC strand”)<sup>1</sup> by the Government of Turkey and less-than-fair-value (“LTFV”) imports of PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and the United Arab Emirates (“UAE”). The following tabulation provides information relating to the background of these investigations.<sup>2 3</sup>

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<sup>1</sup> See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

<sup>2</sup> Pertinent *Federal Register* notices are referenced in appendix A and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> A list of witnesses that participated in the conference via written submission is presented in appendix B of this report.

Effective date	Action
April 16, 2020	Petitions filed with Commerce and the Commission; institution of Commission investigations (85 FR 22751, April 23, 2020)
May 7, 2020	Commission's conference (conducted through written statements, testimony, questions, and responses, May 5-12, 2020)
May 6, 2020	Commerce's notice of initiation AD (85 FR 28605, May 13, 2020)
May 6, 2020	Commerce's notice of initiation CVD-Turkey (85 FR 28610, May 13, 2020)
May 29, 2020	Commission's vote
June 1, 2020	Commission's determinations
June 8, 2020	Commission's views

Note: Due to the COVID-19 pandemic, the Commission did not hold an in-person conference. Rather, parties provided opening remarks and witness testimony through written submissions prior to the date above.

## 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--<sup>4</sup>

*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*

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

*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.*

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

*(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, the alleged subsidy and 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.

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

## Market summary

PC strand is used in the construction of prestressed concrete (both pre-tensioned and post-tensioned applications) structural components to introduce compression into the concrete. The leading U.S. producers of PC strand are \*\*\*, while leading producers of PC strand outside the United States include \*\*\*. The leading U.S. importers of PC strand from subject sources are \*\*\*. Leading importers of PC strand from nonsubject sources include \*\*\*. Leading U.S. purchasers of PC strand that responded to the Commission’s questionnaire include \*\*\*.

Apparent U.S. consumption of PC strand totaled approximately \*\*\* pounds (\$\*\*\*) in 2019. Currently, five firms are known to produce PC strand in the United States. U.S. producers’ U.S. shipments of PC strand totaled 641.2 million pounds (\$321.4 million) in 2019 and accounted for 67.2 percent of apparent U.S. consumption by quantity and 71.4 percent by value. U.S. imports from subject sources totaled 280.3 million pounds (\$114.1 million) in 2019 and accounted for 29.4 percent of apparent U.S. consumption by quantity and 25.3 percent by value. U.S. imports from nonsubject sources totaled 33.1 million pounds (\$14.8 million) in 2019 and accounted for 3.5 percent of apparent U.S. consumption by quantity and 3.3 percent by value.

## Summary data and data sources

A summary of data collected in these investigations is presented in appendix C, table C-1. Except as noted, U.S. industry data are based on questionnaire responses of five firms that accounted for \*\*\* of U.S. production of PC strand during 2019. U.S. imports are based on official U.S. import statistics under HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012.

Additional data regarding imported PC strand are based on the responses of 10 U.S. importers accounting for 84.3 percent of imports from subject sources and 87.3 percent of imports of PC strand from all import sources. Additionally, the Commission received 13 usable questionnaire responses from firms that have purchased PC strand since 2017. The Commission received 19 foreign producer questionnaires from firms in 14 subject countries<sup>6</sup> where coverage ranged from \*\*\*<sup>7</sup> percent to \*\*\* percent. Reported coverage of PC strand exports to

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<sup>6</sup> The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Colombia.

<sup>7</sup> The Commission received a foreign/producer exporter questionnaire response from one firm in UAE; Essen Steel Industry LLC (“Essen”). In its questionnaire response, Essen indicated \*\*\*.

the United States was approximately 45 percent to 80 percent for three countries (\*\*\*) , and over 80 percent for 10 countries (\*\*\*) .<sup>8</sup>

## **Previous and related investigations**

The Commission has conducted a number of previous import relief investigations on PC strand or similar merchandise. Table I-1 presents data on previous and related title VII investigations.

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<sup>8</sup> Coverage figures were calculated comparing reported figures from foreign producer questionnaires and official import statistics.

**Table I-1****PC strand: Previous and related Commission proceedings**

Original investigation				Current Status
Date	Number(s)	Countries	Outcome	
1978	AA1921-182	India	Negative	N/A
1978	AA1921-188	Japan	Affirmative	Currently under fifth review; instituted March 2, 2020 and grouped with the third reviews for Brazil, India, Korea, Mexico, and Thailand. .
1982	701-TA-164	Spain	Negative	N/A
1982	701-TA-152	Brazil	Negative	N/A
1982	701-TA-153	France	Negative	N/A
1982	731-TA-89	United Kingdom	Negative	N/A
2003	701-TA-432 and 731-TA-1024-1028	Brazil, India, Korea, Mexico, and Thailand	Affirmative	Currently under third reviews; instituted March 2, 2020 and grouped with the fifth review for the AD on Japan.
2009	701-TA-464 and 731-TA-1160	China	Affirmative	Orders continued after second review, October 13, 2015.

Note: "Date" refers to the year in which the investigation or review was instituted by the Commission.

Source: U.S. International Trade Commission publications and Federal Register notices.

## Nature and extent of alleged subsidies and sales at LTFV

### Alleged subsidies

On May 13, 2020, Commerce published a notice in the *Federal Register* of the initiation of its countervailing duty investigation on PC strand from Turkey.<sup>9</sup> Commerce identified the following twenty-two government programs in Turkey:

- Deductions from taxable income for export revenue
- Inward processing certificates

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<sup>9</sup> Turkey CVD Initiation Checklist, May 13, 2020.



- Exemption from property tax
- Free zones law No. 3218: Corporate income tax exemption
- Free zones law no. 3218: Exemption from income tax for workers' wages
- Tax and fee incentives for renewable energy
- Investment incentive scheme
- Regional investment incentive scheme
- Large scale investment incentive scheme
- Strategic investment incentive scheme
- Project-based investment incentive program
- Rediscount program
- Investment credit for export program
- Export-oriented business investment loans
- Export buyer's credit
- Provision of land for less than adequate remuneration
- Provision for natural gas for less than adequate remuneration
- Renewable energy support mechanism
- Foreign fair support program
- Foreign market research and market entry grants
- Incentives under R&D law
- TUBITAK grants

### **Alleged sales at LTFV**

On May 13, 2020, Commerce published a notice in the *Federal Register* of the initiation of its antidumping duty investigations on PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and UAE.<sup>10</sup> Commerce has initiated antidumping duty investigations based on estimated dumping margins for each of the countries covered by this initiation as follows: (1) Argentina—60.40 percent; (2) Colombia—86.09 percent; (3) Egypt—29.72 percent; (4) Indonesia—72.28 percent; (5) Italy—30.61 percent; (6) Malaysia—39.57 percent; (7) Netherlands—30.86 percent; (8) Saudi Arabia—194.40 percent; (9) South Africa—155.10 percent; (10) Spain—38.57 percent; (11) Taiwan—23.89 percent; (12) Tunisia—53.11 percent; (13) Turkey—53.65 percent; (14) Ukraine—17.70 and 53.83 percent; (15) UAE—170.65 percent.

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<sup>10</sup> 85 FR 28605, May 13, 2020.

## The subject merchandise

### Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:<sup>11</sup>

*The merchandise covered by these investigations is prestressed concrete steel wire strand (PC strand), produced from wire of non-stainless, non-galvanized steel, which is suitable for use in prestressed concrete (both pre-tensioned and post-tensioned) applications. The product definition encompasses covered and uncovered strand and all types, grades, and diameters of PC strand. PC strand is normally sold in the United States in sizes ranging from 0.25 inches to 0.70 inches in diameter. PC strand made from galvanized wire is only excluded from the scope if the zinc and/or zinc oxide coating meets or exceeds the 0.40 oz./ft<sup>2</sup> standard set forth in ASTM-A-475.*

*The PC strand subject to these investigations is currently classifiable under subheadings 7312.10.3010 and 7312.10.3012 of the Harmonized Tariff Schedule of the United States (HTSUS). Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the scope of these investigations 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 are imported under the following provisions of the Harmonized Tariff Schedule of the United States ("HTS"): 7312.10.3010 and 7312.10.3012. The 2020 general rate of duty is free for HTS statistical reporting numbers 7312.10.3010 and 7312.10.3012. Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

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<sup>11</sup> 85 FR 28610, May 13, 2020.

## The product

### Description and applications<sup>12</sup>

PC strand consists of multiple steel wires wound together to produce a strong, flexible product that is used to strengthen concrete structures. PC strand is commonly available in three grades, in covered and uncovered form, and in several nominal diameters. The most common PC strand configuration consists of six wires wound helically around a single wire core. Nominal diameters of PC strand typically range from 0.25 to 0.70 inch and generally have three grade designations: 250, 270, and 300.

PC strand is used in the construction of prestressed concrete structural components to introduce compression into the concrete. This compression offsets or neutralizes forces within the concrete that occur when it is subjected to loads. Typical applications of prestressed concrete include bridge decks, bridge girders, pilings, precast concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations. One of the most widespread uses of prestressed concrete, however, is parking garages.

PC strand may be pre-tensioned or post-tensioned. Pre-tensioned PC strand is tensioned (pulled tightly and slightly elongated) using a calibrated tensioning apparatus, and concrete is cured around the PC strand. After the concrete has cured, the tension is released, and the tensile force of the strand induces a compressive force in the concrete. Pre-tensioned prestressed concrete depends upon the bond between the concrete and the PC strand to hold the concrete in compression. Most pre-tensioned concrete elements are prefabricated in a factory and must be transported to the construction site. Pre-tensioned concrete components may be used in balconies, lintels, floor slabs, beams, or foundation piles.

For post-tensioned PC strand, there is no bond between the PC strand and the cured concrete. Instead, the PC strand is tensioned using a calibrated tensioning apparatus after the concrete has cured. In post-tensioned prestressed concrete, tension is maintained by installing permanent mechanical anchors that remain in place after the tensioning apparatus is removed. Unlike pre-tensioning, which is largely performed at precast manufacturing facilities, post-tensioning takes place on the job site in cast-in-place applications. The concrete component is cast in a way that allows PC strand to be installed so that it is protected from bonding with the

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<sup>12</sup> Unless otherwise noted, this information is based on *Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand*, Investigation Nos. 701- TA-432 and 731-TA-1024-8 (Second Review) and AA1921-188 (Fourth Review), USITC Publication 4527, April 2015 (“Second review publication”), pp. I-4-I-6.

concrete. Post-tensioning gives designers the flexibility to further optimize material use by creating thinner concrete components. The predominant end uses of post-tensioned PC strand are in slab-on-grade construction and in buildings for floors with moderate-to-long spans and moderate floor loads such as in parking garages and residential buildings.

Depending on the application, PC strand will be either uncoated or coated (with plastic or epoxy). For pre-tensioning applications, where the bond between the cured concrete and the PC strand holds the concrete in compression, the PC strand is installed uncoated. In contrast, post-tensioning applications may require uncoated or coated PC strand. Plastic-coated PC strand is lubricated with grease and encased in a plastic tube, whereas epoxy-coated PC strand is coated with epoxy.

There are two methods of post-tensioning PC strand in concrete members: internal and external. For internal post-tensioning applications, the PC strand is either (1) greased and plastic-coated (which keeps the concrete from bonding to the PC strand during the curing process) and concrete is cured around the coated PC strand or (2) plastic or metal ducts are cast into the concrete and uncoated PC strand is passed through each duct. If the duct method is used, after tensioning and anchoring, the ducts containing the PC strand are filled with grout to protect it from corrosion. For external post-tensioning applications, coated PC strand or galvanized (zinc-coated) PC strand may be used to protect against corrosion. Whether it is used uncoated or coated, PC strand of various suppliers is interchangeable within each physical size, physical configuration, and grade.

### **Manufacturing processes<sup>13</sup>**

PC strand is typically produced from hot-rolled, high-carbon steel wire rod. The production process consists of four distinct steps: drawing, stranding, stabilizing, and packaging. The drawing step begins with cleaning and descaling to remove dirt and mill scale from the hot-rolled, high-carbon steel wire rod before feeding it through the wire drawing dies. Cleaning and descaling can be accomplished chemically, using a strong acid, or mechanically, using abrasive methods. The cleaned and descaled wire rod is then coated with zinc phosphate and pulled through a series of wire drawing dies to reduce its size. Depending on the finished size required,

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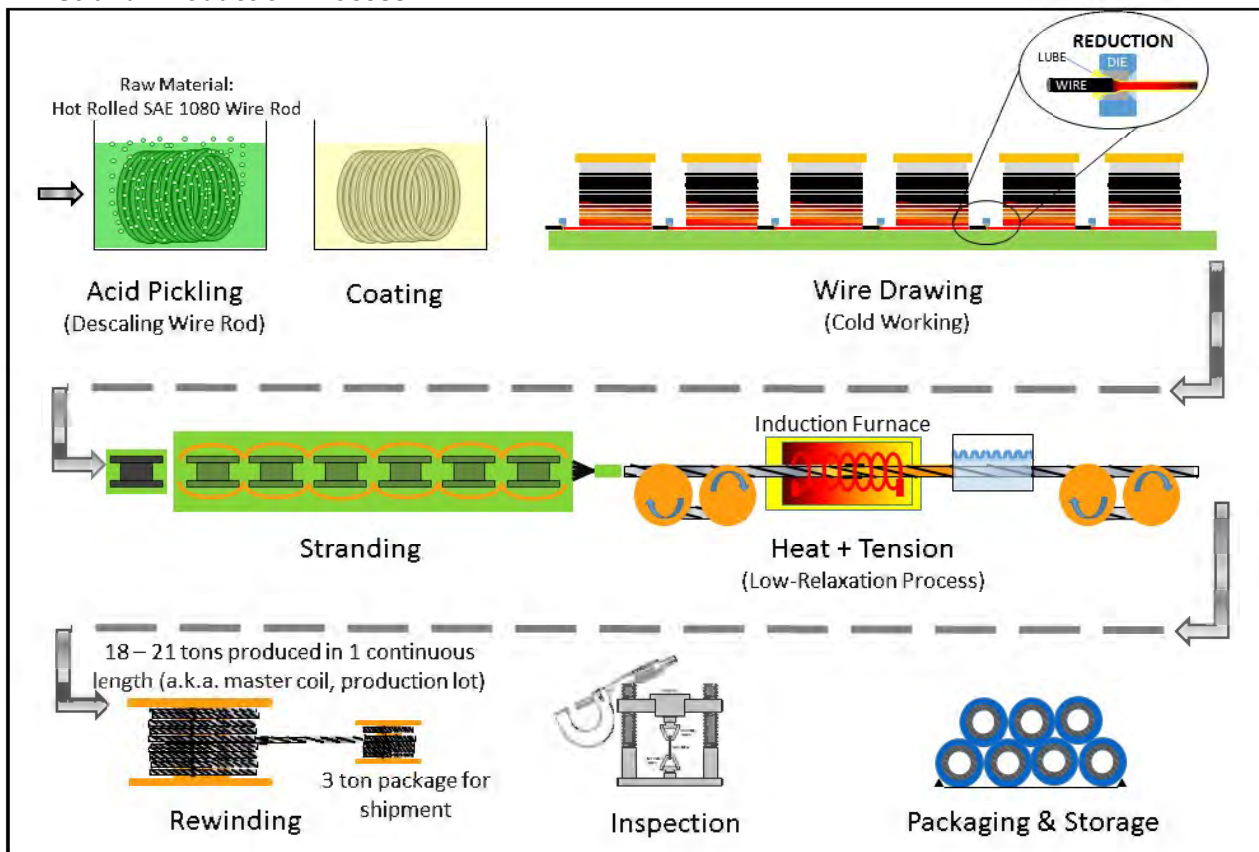
<sup>13</sup> Unless otherwise noted, this information is based on Prestressed Concrete Steel Wire Strand from Brazil, India, Japan, Korea, Mexico, and Thailand, Investigation Nos. 701- TA-432 and 731-TA-1024-8 (Second Review) and AA1921-188 (Fourth Review), USITC Publication 4527, April 2015 (“Second review publication”), pp. I-6.

the rod may be drawn through up to nine dies. If indented wire is specified, the wire is indented, using carbide rollers, after the final size reduction.

After drawing, the wire undergoes stranding. During the stranding process, wires are wound into a strand, helically and uniformly, by a stranding machine. The PC strand is then stabilized by removing residual mechanical stresses through thermal and possibly mechanical treatments. The extent of the stress relief determines the type of PC strand. Low-relaxation PC strand is subjected to simultaneous thermal and mechanical treatment after stranding, while “normal”-relaxation PC strand (commonly referred to as stressed-relieved PC strand) requires only thermal treatment. Finally, if coating is required, the PC strand is either lubricated with grease and encased in a plastic tube or coated with epoxy.

The finished product is wound onto a drum, strapped into place with steel bands, and packaged as a coil. The coil may be covered with a protective material, such as plastic or burlap and is packaged such that the end user can place the coil directly onto a strand dispenser.

**Figure I-1**  
**PC Strand: Production Process**



Source: Sumiden Wire Products Corporation. "PC Strand." <http://www.sumidenwire.com/products/pc-strand/>. Retrieved, March 13, 2020.

## **Domestic like product issues**

No issues with respect to domestic like product have been raised in these investigations. The petitioners propose that the Commission define a single domestic like product that is co-extensive with the scope of the investigations consisting of all PC strand, which they assert is consistent with the domestic like product definition adopted by the Commission in its recent investigations involving PC strand from China. Respondents do not contest the domestic like product definition for the preliminary phase of these investigations.

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

### U.S. market characteristics

PC strand is used in the construction of prestressed concrete structural members, compressing the members to offset, or neutralize, forces which occur when they are subject to load. Typical applications for prestressed concrete include bridge decks, bridge girders, pilings, precast concrete panels and structural supports, roof trusses, floor supports, and certain concrete foundations.

PC strand is used to prestress concrete either before the concrete is cured (pre-tensioning) or after it is cured (post-tensioning). Most pre-tensioned concrete elements are prefabricated in a factory and must be transported to the construction site. Pre-tensioned components may be used in balconies, lintels, floor slabs, beams, or foundation piles. By contrast, post-tensioning takes place on the job site in cast-in-place applications. The predominant end uses of post-tensioned PC strand are in buildings for floors with moderate-to-long spans and moderate floor loads such as in parking garages and residential buildings, and in slab-on-grade construction.<sup>1</sup>

Apparent U.S. consumption of PC strand fluctuated during 2017-19, increasing from 2017 to 2018 and decreasing from 2018 to 2019. Overall, apparent U.S. consumption in 2019 was 0.8 percent higher than in 2017.

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<sup>1</sup> *Prestressed Concrete Steel Wire Strand from China*, Investigation Nos. 701-TA-464 and 731-TA-1160 (Final), USITC Pub. 4162, June 2010, p. II-1.

## Channels of distribution

U.S. producers and importers sold almost all of their PC strand to end users during 2017-19.<sup>2</sup> U.S. importers of PC strand from \*\*\* were the only importers reporting any sales to distributors.

## Type of end use

U.S. shipments of PC strand by U.S. producers and importers for pre-tension applications and post-tension applications are shown in table II-1. U.S. producers sold a majority of their PC strand for use in pre-tension applications while importers sold a majority of the PC strand imported from subject countries for use in post-tension applications.

**Table II-1**  
**PC strand: U.S. producers' and importers' U.S. shipments, by sources and application, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of U.S. shipments (percent)</b>		
U.S. producers:			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Argentina			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Colombia			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Egypt			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Indonesia			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Italy			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Malaysia			
Pre-tension applications	***	***	***
Post-tension applications	***	***	***

Table continued on next page.

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<sup>2</sup> U.S. producer sales to distributors were \*\*\*.



Table II-1--continued

## PC strand: U.S. producers' and importers' U.S. shipments, by sources and application, 2017-19

Item	Calendar year		
	2017	2018	2019
	<b>Share of U.S. shipments (percent)</b>		
U.S. importers: Netherlands Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Saudi Arabia Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: South Africa Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Spain Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Taiwan Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Tunisia Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Turkey Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Ukraine Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: UAE Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: Subject Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: All other countries: Pre-tension applications	***	***	***
Post-tension applications	***	***	***
U.S. importers: All sources: Pre-tension applications	***	***	***
Post-tension applications	***	***	***

Note: \*\*\*.

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

## Geographic distribution

U.S. producers reported selling PC strand to all regions in the United States (table II-2). Importers reported selling mainly in the Southeast, Central Southwest, Mountains and Pacific Coast regions, and reported no sales to the Midwest region. For U.S. producers, 17 percent of sales were within 100 miles of their production facility, 78 percent were between 101 and 1,000 miles, and 5 percent were over 1,000 miles. Importers sold 42 percent within 100 miles of their U.S. point of shipment, 56 percent between 101 and 1,000 miles, and 2 percent over 1,000 miles.

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

Item	Northeast	Midwest	Southeast	Central Southwest	Mountains	Pacific Coast	Other	All regions (except Other)
U.S. producers	5	5	5	5	5	5	3	5
Subject sources:								
Argentina	---	---	1	1	1	---	---	---
Colombia	---	---	1	1	1	1	---	---
Egypt	---	---	1	2	---	---	---	---
Indonesia	---	---	---	---	2	2	---	---
Italy	1	---	2	3	1	1	---	---
Malaysia	---	---	1	2	2	2	---	---
Netherlands	---	---	---	---	---	---	---	---
Saudi Arabia	---	---	---	---	---	---	---	---
South Africa	---	---	---	1	---	---	---	---
Spain	1	---	1	---	---	---	---	---
Taiwan	---	---	---	1	---	1	---	---
Tunisia	---	---	1	1	---	1	---	---
Turkey	---	---	3	3	---	1	---	---
Ukraine	---	---	---	1	---	---	---	---
UAE	---	---	---	---	---	---	---	---
Subject sources	2	---	4	4	3	3	---	---

Note: Other is all other U.S. markets, including AK, HI, PR, and VI. This table only includes firms that resold PC strand and does not include importers that internally consumed PC strand.

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

## Supply and demand considerations

### U.S. supply

Table II-3 provides a summary of the supply factors regarding PC strand from U.S. producers and from subject countries. The subject countries with the largest reported capacity

include (in order of 2019 capacity) \*\*\*. Reported capacity in subject countries combined increased from 2017 to 2019, with increases reported in eight countries and stable capacity in six countries.<sup>3</sup> Capacity utilization reported by U.S. producers and in subject countries combined fell between 2017 and 2019.

**Table II-3**  
**PC strand: Supply factors that affect the ability to increase shipments to the U.S. market**

Country	Capacity (Million pounds)		Capacity utilization (percent)		Ratio of inventories to total shipments (percent)		Shipments by market, 2019 (percent)		Able to shift to alternate products
	2017	2019	2017	2019	2017	2019	Home market shipments	Exports to non-U.S. markets	No. of firms reporting “yes”
United States	***	***	***	***	***	***	***	***	1 of 5
Argentina	***	***	***	***	***	***	***	***	0 of 1
Colombia	***	***	***	***	***	***	***	***	0 of 0
Egypt	***	***	***	***	***	***	***	***	0 of 1
Indonesia	***	***	***	***	***	***	***	***	0 of 2
Italy	***	***	***	***	***	***	***	***	1 of 2
Malaysia	***	***	***	***	***	***	***	***	0 of 2
Netherlands	***	***	***	***	***	***	***	***	0 of 1
Saudi Arabia	***	***	***	***	***	***	***	***	0 of 2
South Africa	***	***	***	***	***	***	***	***	0 of 1
Spain	***	***	***	***	***	***	***	***	0 of 1
Taiwan	***	***	***	***	***	***	***	***	0 of 1
Tunisia	***	***	***	***	***	***	***	***	0 of 1
Turkey	***	***	***	***	***	***	***	***	0 of 2
Ukraine	***	***	***	***	***	***	***	***	0 of 1
UAE	***	***	***	***	***	***	***	***	0 of 1
Total subject	***	***	***	***	***	***	***	***	1 of 19

Note: Responding U.S. producers accounted for virtually all of U.S. production of PC strand in 2019. Responding foreign producer/exporter firms accounted for over 80 percent of U.S. imports of PC strand from subject countries during 2019. No data were reported for Colombia. 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 PC strand have the ability to respond to changes in demand with large changes in the quantity of shipments of U.S.-produced PC strand to the U.S. market. The main factors contributing to this degree of responsiveness of

<sup>3</sup> \*\*\*.

supply are the low capacity utilization rate and some inventories. Factors mitigating responsiveness of supply include a limited ability to shift shipments from alternate markets and a limited ability to shift production to or from alternate products.

U.S. producers' capacity utilization rates declined because capacity increased and production declined between 2017 and 2019. U.S. producers reported no production constraints other than the capacity of the machinery. One U.S. producer reported that it could produce other products (\*\*\*) on the same equipment used to produce PC strand.

### **Imports from subject countries**

In general, producers in subject countries have the ability to respond to changes in demand with moderate-to-large changes in the quantity of shipments of PC strand to the U.S. market, although the ability to respond varies by country. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and an ability to shift shipments from alternative markets. Factors mitigating responsiveness of supply include a limited ability to shift shipments from inventories, and a very limited ability to shift production to or from alternate products.

Production capacity in all reporting subject countries was either unchanged or increased during 2017-19. Capacity increased in eight countries, with most of the increase (\*\*\*) percent occurring in Turkey and Malaysia and remained constant for six subject countries.<sup>4</sup> In 2019, seven subject countries had capacity utilization rates between 60 and 85 percent, five had rates below 60 percent<sup>5</sup> and two (\*\*\*) had rates over 90 percent.

Reported inventories (as a share of shipments) in most of the subject countries increased between 2017 and 2019, although the share of inventories in most countries was lower than U.S. producers' inventories. Two subject countries reported relatively high inventory-to-shipment ratios: \*\*\*.

Combined subject countries' exports to both the United States and to other markets accounted for about 60 percent of their total sales, although the shares varied widely by country. Shares of shipments to each countries' home market ranged from less than 5 percent to over 95 percent. Five countries' reported shares of shipments to the home market ranged from 40 to 60 percent. Subject country exports to non-U.S. markets ranged from 0 percent to

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<sup>4</sup> The Commission did not receive any questionnaire responses from foreign producers in Colombia.

<sup>5</sup> Countries with capacity utilization rates below 60 percent include \*\*\*.

over 60 percent with most countries' exports ranging from 20 to 50 percent. Six subject countries, including two with the largest capacity (\*\*\*) , exported more than one-third of their total shipments to non-U.S. markets in 2019, indicating that there is some ability to shift shipments from alternate markets. Only one foreign producer indicated an ability to shift production from PC strand to other products.<sup>6</sup>

### **Imports from nonsubject sources**

Nonsubject imports accounted for 10 percent of total U.S. imports in 2019. The largest source of nonsubject imports during 2017-19 was Portugal. It accounted for 87 percent of nonsubject imports in 2019.

### **Supply constraints**

One of five responding U.S. producers and three of seven importers reported supply shortages. The U.S. producer reported using controlled order entry to allocate production following a temporary wire rod shortage (lasting less than one quarter) following the imposition of section 232 tariffs in 2018. Importers reported shortages because of late shipments and increased demand for PC strand by the end of 2017. One importer reported that the imposition of the section 232 tariffs led to limited domestic supply and longer lead times for domestic product than for imports.

### **U.S. demand**

Based on available information, the overall demand for PC strand is likely to experience small changes in response to changes in price. The main contributing factors are the limited range of substitute products and the relatively small cost share of PC strand in most of its ultimate end-use products.

### **End uses and cost share**

U.S. demand for PC strand depends on the demand for U.S.-produced downstream products. PC strand is used in the construction of prestressed concrete structural members, which are used in the construction of buildings, bridges, parking decks, and garages, highways, and slabs for residences. Therefore, demand for PC strand is derived from the demand for construction, including infrastructure projects, commercial and institutional construction, large

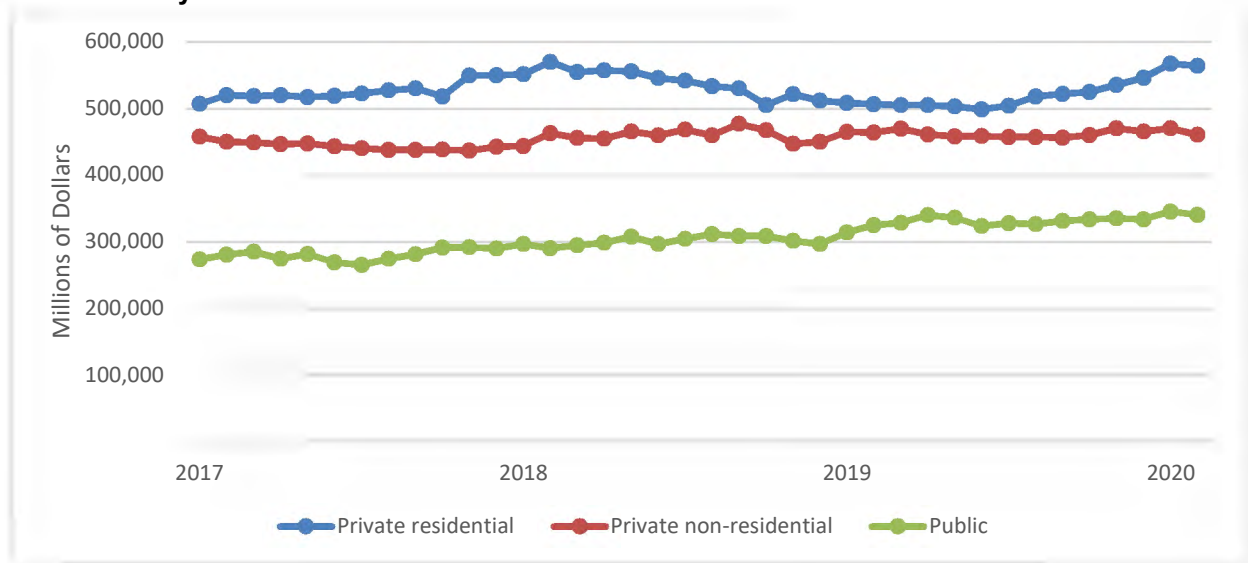
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<sup>6</sup> These other products included \*\*\*.

housing projects, and single-family housing. Monthly values of public, private nonresidential, and private residential construction are shown in figure II-1. Private residential construction, private nonresidential construction, and public construction all increased between January 2017 and December 2019. Private residential construction reportedly uses more slabs-on-grade, a post-tensioned application, than public construction and private nonresidential construction.<sup>7</sup> The higher growth rate in private residential construction from 2017 to 2019 suggests higher growth in the demand for PC strand used for post-tensioning applications compared to that used for pre-tensioning applications.

**Figure II-1**

**Construction spending: Total value of private residential, public nonresidential and public construction put in place in the United States, seasonally adjusted annual rate, monthly, January 2017-February 2019**



Source: U.S. Census Bureau, <https://www.census.gov/construction/c30/c30index.html>, retrieved April 4, 2020.

PC strand typically accounts for a relatively large share of intermediate products for which it is used but a small share of the cost of end-use products. Reported cost shares for intermediate products include: tendons (70 percent), post-tension slabs (55 to 65 percent), post-tensioning (80 percent), prestress (25 percent), stay cables (60 percent), bridge girders (17 percent), precast double Ts (15 percent), and concrete girders (15 percent). Reported cost shares for final products include: buildings (30 percent), garages (2 percent), bridges (2 percent), and houses (2 to 15 percent).

<sup>7</sup> Prestressed Concrete Steel Wire Strand from China, Investigation Nos. 701-TA-464 and 731-TA-1160 (Final), USITC Pub. 4162, June 2010, p. II-6.

## Business cycles

Two of five U.S. producers and three of six importers indicated that the U.S. market was subject to business cycles or other conditions of competition. Specifically, firms stated that demand for PC strand is affected by housing starts, interest rates, and infrastructure projects; that demand in some areas of the United States is seasonal; and that COVID-19 has reduced demand. One producer stated that duties on the main raw material input, hot-rolled wire, have led to increased imports of PC strand.

## Demand trends

Most U.S. producers reported an increase in U.S. demand for PC strand since January 1, 2017 (table II-4). Most importers reported that U.S. demand was unchanged or that demand had fluctuated.

**Table II-4**

**PC strand: Firms' responses regarding U.S. demand and demand outside the United States**

Item	Increase	No change	Decrease	Fluctuate
<b>Demand in the United States</b>				
U.S. producers	4	---	---	1
Importers	1	2	1	2
<b>Demand outside the United States</b>				
U.S. producers	---	---	---	1
Importers	---	3	---	2

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

## Substitute products

All five responding producers and five of the six responding importers reported that there were no substitutes for PC strand. One importer reported that substitutes include rebar for slabs in homes and apartments and structural steel in high rise and commercial construction. Petitioners stated that the use of PC strand is determined by engineering requirements and building codes, and that there are no practical alternatives or substitutes. Therefore, petitioners claim that changes in the price of PC strand typically do not influence design decisions.<sup>8</sup>

## Substitutability issues

The degree of substitution between domestic and imported PC strand depends upon such factors as relative prices e.g., price (discounts/rebates), quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., lead times between order and delivery dates,

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<sup>8</sup> Petitioners' postconference brief, answers to staff questions, pp. 3-4.

reliability of supply, product services, etc.). Based on available data, staff believes that there is a moderate-to-high degree of substitutability between domestically produced PC strand and PC strand imported from subject sources. Substitutability is reduced by the prevalence of Buy-American provisions in the U.S. market for PC strand, which petitioners report cover \*\*\* of total sales.

## **Lead times**

PC strand is primarily sold from inventory. U.S. producers reported that 97 percent of their commercial shipments came from inventories, with lead times averaging four days. The remaining 3 percent of their commercial shipments were produced-to-order, with lead times averaging 20 days. U.S. importers reported that 44 percent of their commercial shipments were from U.S. inventories, with lead times averaging 17 days;<sup>9</sup> 5 percent were from foreign inventories; with lead times of 60 days; and 51 percent were produced to order; with lead times of 86 days.

## **Factors affecting purchasing decisions**

Purchasers responding to lost sales lost revenue allegations<sup>10</sup> were asked to identify the main purchasing factors their firm considered in their purchasing decisions for PC strand. The major purchasing factors identified by firms include price (listed by all 12 responding purchasers), availability/on time delivery (listed by 9), and quality (listed by 7).

## **Buy American provisions**

Petitioners estimate that Buy American sales accounted for \*\*\* percent of total PC strand sales.<sup>11</sup> Petitioners also state that prices under Buy-American provisions are similar to other prices because purchasers know of the prices for PC strand in the rest of the market and are unwilling to accept a price that is much higher when purchasing under Buy-American provisions. Respondents estimate that Buy American provisions cover almost 50 percent of sales in the U.S. market.<sup>12</sup>

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<sup>9</sup> Two importers reported lead times of one to two days, and one reported 20 days.

<sup>10</sup> This information is compiled from responses by purchasers identified by Petitioners to the lost sales lost revenue allegations. See Part V for additional information.

<sup>11</sup> Petitioners' postconference brief p. 19.

<sup>12</sup> Respondent Athanor's conference testimony, opening remarks of John Gurley.



## Comparison of U.S.-produced and imported PC strand

In order to determine whether U.S.-produced PC strand can generally be used in the same applications as imports from subject countries, U.S. producers and importers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-5, all four responding U.S. producers reported that domestic PC strand was always interchangeable with PC strand from each subject country.<sup>13</sup> Importer responses were more mixed with firms reporting that U.S.-product was always, usually, or sometimes, interchangeable with product from each subject country, and relatively few importers responded for each subject country. For the subject countries with the largest capacities, in comparisons to U.S. product, \*\*\*. One importer (\*\*\*) explained that PC strand from many of the subject countries (Egypt, Indonesia, Italy, Malaysia, Saudi Arabia, Tunisia, Turkey and Ukraine) is only sometimes interchangeable with U.S.- produced PC strand because the U.S. producers refuse to sell PC strand to \*\*\* and foreign producers offer better service/support, allow \*\*\* to order specific widths, offer better conditions of sales and lead times, have equipment that produces better yields, and unlike U.S. producers, do not have capacity restrictions.

One importer (\*\*\*) reported that although PC strand from different countries is the same underlying product, “minor differences in dimensions and/or material properties have a major impact in jobsite issues.”

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<sup>13</sup> Comparisons for all country pairs are shown in table F-1.

**Table II-5****PC strand: Interchangeability between PC strand produced in the United States and in other countries, by country pair**

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Argentina	4	---	---	---	---	1	---	---
United States vs. Colombia	4	---	---	---	1	---	1	---
United States vs. Egypt	4	---	---	---	1	1	1	---
United States vs. Indonesia	4	---	---	---	1	---	2	---
United States vs. Italy	4	---	---	---	1	2	1	---
United States vs. Malaysia	4	---	---	---	1	---	2	---
United States vs. Netherlands	4	---	---	---	---	1	---	---
United States vs. Saudi Arabia	4	---	---	---	---	---	2	---
United States vs. South Africa	4	---	---	---	2	---	1	---
United States vs. Spain	4	---	---	---	---	1	---	---
United States vs. Taiwan	4	---	---	---	---	1	---	---
United States vs. Tunisia	4	---	---	---	1	---	2	---
United States vs. Turkey	4	---	---	---	2	1	1	---
United States vs. Ukraine	4	---	---	---	---	---	2	---
United States vs. UAE	4	---	---	---	---	---	1	---

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

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

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

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

In addition, U.S. producers and importers were asked to assess how often differences other than price were significant in sales of PC strand from the United States, subject, or nonsubject countries. As seen in table II-6, all four responding producers reported that such differences were never significant for all country comparisons.<sup>14</sup> Importers provided more mixed responses, with a majority reporting that such differences were at least sometimes significant for all country comparisons with the United States. Differences reported by importers included quality (quality of wire rod used to produce the strand, accuracy of elongation, and efficiency of bonding), availability, and delivery time.

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<sup>14</sup> Factors other than price for all country pairs are reported in table F-2.

**Table II-6**

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

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Argentina	---	---	---	4	---	1	---	---
United States vs. Colombia	---	---	---	4	---	---	2	---
United States vs. Egypt	---	---	---	4	1	1	1	---
United States vs. Indonesia	---	---	---	4	1	---	2	---
United States vs. Italy	---	---	---	4	1	1	2	---
United States vs. Malaysia	---	---	---	4	1	---	2	---
United States vs. Netherlands	---	---	---	4	---	1	---	---
United States vs. Saudi Arabia	---	---	---	4	1	---	1	---
United States vs. South Africa	---	---	---	4	---	---	2	1
United States vs. Spain	---	---	---	4	---	1	---	---
United States vs. Taiwan	---	---	---	4	---	1	---	---
United States vs. Tunisia	---	---	---	4	1	---	2	---
United States vs. Turkey	---	---	---	4	1	1	2	---
United States vs. Ukraine	---	---	---	4	1	---	1	---
United States vs. UAE	---	---	---	4	---	---	1	---

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

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



## **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 was presented in *Part I* 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 five firms that accounted for the \*\*\* of U.S. production of PC strand during 2019.

### **U.S. producers**

The Commission issued a U.S. producer questionnaire to five firms based on information contained in the petition. Five firms provided usable data on their operations.<sup>1</sup> Staff believes that these responses represent all or nearly all of U.S. production of PC strand.

Table III-1 lists U.S. producers of PC strand, their production locations, positions on the petition, and shares of total production.

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<sup>1</sup> The Commission did not issue a U.S. producer questionnaire to \*\*\*.

**Table III-1**

**PC strand: U.S. producers of PC strand, their positions on the petition, production locations, and shares of reported production, 2019**

<b>Firm</b>	<b>Position on petition</b>	<b>Production location(s)</b>	<b>Share of production (percent)</b>
Bekaert	***	Van Buren, AR	***
Insteel	Petitioner	Sanderson, FL, Gallatin, TN, Houston, TX, and Summerville, SC	***
Liberty	***	Summerville, SC	***
Sumiden	Petitioner	Dickson, TN, Stockton, CA, and Dayton, TX	***
WMC	Petitioner	Saint Matthews, SC and Conroe, TX	***
Total			***

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.

**Table III-2**

**PC strand: U.S. producers' ownership, related and/or affiliated firms, since January 1, 2017**

\* \* \* \* \*

As indicated in table III-2, one U.S. producer is related to a foreign producer of the subject merchandise. In addition, as discussed in greater detail below, \*\*\* U.S. producers directly import the subject merchandise and \*\*\* indicated that they purchase the subject merchandise from U.S. importers.

Table III-3 presents important industry events since January 1, 2017. The important industry events are selected from sources that are publicly available.

**Table III-3**  
**PC strand: Important industry events since January 1, 2017**

Item	Firm	Event
Plant opening	Sumiden	On August 9 <sup>th</sup> , 2017, Sumiden began production operations at its greenfield PC strand plant in Dayton, TX. <sup>1</sup>
Plant opening	Liberty	On June 25 <sup>th</sup> , 2018, Liberty restarted wire rod production operations at its Georgetown, SC plant, which had been idled for the previous three years. <sup>2</sup>
Expansion	WMC	On November 6 <sup>th</sup> , 2017, WMC announced plans to install a new pickling line and eight drawing machines for PC strand at its plant in St. Matthews, SC. <sup>3</sup>
Expansion	WMC	On March 20 <sup>th</sup> , 2018, WMC announced plans to add a new PC strand line to its plant in Conroe, TX. <sup>4</sup>
Acquisition	WMC	On April 2 <sup>nd</sup> , 2018, WMC announced its acquisition of two wire facilities from Gerdau Long Steel North America. The plants WMC acquired were in Carrollton, TX, and Beaumont, TX. <sup>5</sup>
Acquisition	Insteel	On March 17 <sup>th</sup> , 2020, Insteel announced its acquisition of Strand-Tech Manufacturing, Inc. <sup>6</sup>

Sources:

- 1 "Sumiden Fires up Texas PC Strand Plant." American Metal Market. Accessed April 10, 2020. <https://www.amm.com/Article/3740222/Sumiden-fires-up-Texas-PC-strand-plant.html>.
- 2 "Historic Georgetown Steelworks in South Carolina Reopens as Liberty Steel Georgetown." Liberty House Group. Accessed April 21, 2020. <http://www.libertyhousegroup.com/news/restart-of-south-carolina-steel-mill-liberty-steel-georgetown/>.
- 3 "WMC Plans S. Carolina Plant Upgrade." American Metal Market. Accessed April 10, 2020. <https://www.amm.com/Article/3764792/WMC-plans-S-Carolina-plant-upgrade.html>.
- 4 "WMC to Add PC Strand Line in Houston." American Metal Market. Accessed April 10, 2020. <https://www.amm.com/Article/3795127/WMC-to-add-PC-strand-line-in-Houston.html>.
- 5 "WMC Obtains Two Wire Facilities from Gerdau." American Metal Market. Accessed April 10, 2020. <https://www.amm.com/Article/3797990/WMC-obtains-two-wire-facilities-from-Gerdau.html>.
- 6 "Insteel Industries Acquires Assets Of Strand-Tech Manufacturing." Insteel Industries, Inc. Accessed April 21, 2020. <https://insteelgcs.gcs-web.com/news-releases/news-release-details/insteel-industries-acquires-assets-strand-tech-manufacturing>.

Table III-4 presents U.S. producers' reported changes in operations since January 1, 2017. \*\*\*.

**Table III-4**

**PC strand: U.S. producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
<b>Plant openings:</b>	
***	***
<b>Plant closings:</b>	
***	***
***	***
<b>Relocations:</b>	
***	***
<b>Expansions:</b>	
***	***
***	***
<b>Acquisitions:</b>	
***	***
***	***
<b>Prolonged shutdowns or curtailments:</b>	
***	***
***	***
<b>Other:</b>	
***	***

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



## U.S. production, capacity, and capacity utilization

Table III-5 and figure III-1 present U.S. producers' production, capacity, and capacity utilization during 2017-19. U.S. producers' capacity increased by 9.3 percent from 2017 to 2019. \*\*\*.<sup>2</sup> Total production fluctuated but decreased by 6.4 percent from 2017 to 2019.<sup>3</sup> Capacity utilization fluctuated but decreased by 9.8 percentage points from 2017 to 2019. From 2017 to 2019, \*\*\*.<sup>4</sup>

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<sup>2</sup> \*\*\*. Email message from \*\*\* May 7, 2020.

<sup>3</sup> From 2017 to 2019, \*\*\*.

<sup>4</sup> \*\*\*.

**Table III-5**  
**PC strand: U.S. producers' production, capacity, and capacity utilization, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Capacity (1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	1,001,930	1,035,415	1,095,415
	<b>Production (1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	682,215	711,687	638,869
	<b>Capacity utilization (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	68.1	68.7	58.3
	<b>Share of production (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	100.0	100.0	100.0

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

**Figure III-1**  
**PC strand: U.S. producers' production, capacity, and capacity utilization, 2017-19**

\* \* \* \* \*

**Alternative products**

As shown in table III-6, approximately \*\*\* percent of the product produced during 2017-19 by U.S. producers was PC strand. Three firms (\*\*\*) reported that they exclusively produced PC strand, while \*\*\* indicated that it had produced a small amount of industrial wire for the construction industry during 2017-19. \*\*\* of its total production during 2017-19.<sup>5</sup> \*\*\* out-of-scope production of products for the energy and agricultural sectors accounted for at least \*\*\* of all out-of-scope production in every year for all U.S. producers, during 2017-19.

\*\*\*.<sup>6</sup>

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<sup>5</sup> \*\*\* U.S. producer questionnaire response, section II-3a.

<sup>6</sup> \*\*\* U.S. producer questionnaire response, section II-3a.

**Table III-6**  
**PC strand: U.S. producers' overall plant capacity and production on the same equipment as subject production, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
Overall capacity	***	***	***
Production:			
PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	<b>Ratios and shares (percent)</b>		
Overall capacity utilization	***	***	***
Share of production:			
PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

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

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

Table III-7 presents U.S. producers' U.S. shipments, export shipments, and total shipments during 2017-19. From 2017 to 2019, the quantity of U.S. shipments decreased by \*\*\* percent. During 2017-19, the value of U.S. shipments increased by 9.6 percent. The unit values for U.S. shipments increased by 13.9 percent during 2017-19. From 2017 to 2019, U.S. producers' export shipments were \*\*\* and decreased by \*\*\* percent based on quantity and \*\*\* based on value, respectively. Export shipment unit values increased by \*\*\* during 2017-19. \*\*\* were the only firms that exported PC strand during 2017-19.<sup>7</sup> \*\*\* indicated that the difference in unit values of U.S. shipments and export shipments is "\*\*\*\*."<sup>8</sup>

<sup>7</sup> \*\*\* as its primary export markets, \*\*\* U.S. producer questionnaires, section II-7.

<sup>8</sup> Email message from \*\*\* May 7, 2020.

**Table III-7**  
**PC strand: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. shipments	665,925	699,128	641,153
Export shipments	***	***	***
Total shipments	***	***	***
	<b>Value (1,000 dollars)</b>		
U.S. shipments	293,184	360,384	321,393
Export shipments	***	***	***
Total shipments	***	***	***
	<b>Unit value (dollars per 1,000 pounds)</b>		
U.S. shipments	440	515	501
Export shipments	***	***	***
Total shipments	***	***	***
	<b>Share of quantity (percent)</b>		
U.S. shipments	98.9	99.2	99.3
Export shipments	***	***	***
Total shipments	***	***	***
	<b>Share of value (percent)</b>		
U.S. shipments	98.7	99.0	99.2
Export shipments	***	***	***
Total shipments	***	***	***

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

## U.S. producers' inventories

Table III-8 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 during 2017-19. These data show that U.S. producers' inventories fluctuated and increased by 1.7 percent during 2017-19.<sup>9</sup> The ratios of inventories to production, U.S. shipments, and total shipments all consistently ranged between 10.5 and 11.4 percent during 2017-19.

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<sup>9</sup> Based on the five U.S. producers' combined questionnaire responses, \*\*\*. \*\*\* U.S. producer questionnaire responses, section II-7.

**Table III-8**  
**PC strand: U.S. producers' inventories, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. producers' end-of-period inventories	71,654	79,428	72,900
	<b>Ratio (percent)</b>		
Ratio of inventories to.--			
U.S. production	10.5	11.2	11.4
U.S. shipments	10.8	11.4	11.4
Total shipments	10.6	11.3	11.3

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

## U.S. producers' imports and purchases

During 2017-19, none of the five U.S. producers reported imports or purchase of PC strand. \*\*\* was the only firm to report a related party \*\*\*, \*\*\*.

## U.S. employment, wages, and productivity

Table III-9 shows U.S. producers' employment-related data during 2017-19.<sup>10 11</sup> These data show that U.S. producers' hours per PRW, wages paid, hourly wages, and productivity all increased modestly during 2017-19. PRWs decreased by 8.0 percent during 2017-19, while the number of total hours worked decreased by 7.0 percent. Unit labor costs (dollars per thousand pounds) increased by more than two dollars (\$2.24) from 2017 to 2019.

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<sup>10</sup> U.S. producers reported a loss of combined 33 PRWs during 2017-19. \*\*\*. Email message from \*\*\* May 6, 2020.

<sup>11</sup> \*\*\* reported that "\*\*\*\*" From 2017-19, \*\*\*. \*\*\* reported the largest loss of PRWs during 2017-19. Email message from \*\*\* May 6, 2020, and \*\*\* U.S. producer questionnaire response, section II-9.

**Table III-9****PC strand: Average number of production and related workers, hours worked, wages paid to such employees, hourly wages, productivity, and unit labor costs, 2017-19**

Item	Calendar year		
	2017	2018	2019
Production and related workers (PRWs) (number)	411	398	378
Total hours worked (1,000 hours)	953	973	886
Hours worked per PRW (hours)	2,319	2,445	2,344
Wages paid (\$1,000)	19,203	20,634	19,413
Hourly wages (dollars per hour)	\$20.15	\$21.21	\$21.91
Productivity (pounds per hour)	715.9	731.4	721.1
Unit labor costs (dollars per 1,000 pounds)	\$28.15	\$28.99	\$30.39

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 importer questionnaires to 65 firms believed to be importers of subject PC strand, as well as to all U.S. producers of PC strand.<sup>1</sup> Usable questionnaire responses were received from ten companies,<sup>2</sup> representing the following percentage of imports from individual subject countries in 2019.<sup>3</sup>

- 63.6 percent of U.S. imports from Argentina
- 102.9 percent of U.S. imports from Colombia
- 97.8 percent of U.S. imports from Egypt
- 99.9 percent of U.S. imports from Indonesia
- 92.3 percent of U.S. imports from Italy
- 101.5 percent of U.S. imports from Malaysia
- 0 percent of U.S. imports from Netherlands<sup>4</sup>
- 6.3 percent of U.S. imports from Saudi Arabia
- 90.8 percent of U.S. imports from South Africa
- 11.4 percent of U.S. imports from Spain
- 108.4 percent of U.S. imports from Taiwan
- 111.3 percent of U.S. imports from Tunisia
- 118.4 percent of U.S. imports from Turkey
- 103.7 percent of U.S. imports from Ukraine
- 0 percent of U.S. imports from UAE

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<sup>1</sup> The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by U.S. Customs and Border Protection (“Customs”), may have accounted for more than one percent of total 2019 imports from each subject country under the HTS statistical reporting numbers identified in the scope.

<sup>2</sup> Seven firms reported that they did not import PC strand into the United States.

<sup>3</sup> The response rates presented are calculated based on a comparison of the quantity of 2019 U.S. imports of PC strand as reported in the responses to the Commission’s U.S. importer questionnaires with the total quantity of imports reported in 2019 U.S. official import statistics.

<sup>4</sup> \*\*\* Nedri Spanstaal foreign producer questionnaire section, I-7.

Import quantities and values presented in this report are derived from official U.S. import statistics using HTS statistical reporting numbers 7312.10.3012. Table IV-1 lists all responding U.S. importers of PC strand from subject and nonsubject sources, their locations, and their shares of U.S. imports (compiled from data submitted in response to Commission questionnaires), in 2019.

**Table IV-1**  
**PC strand: U.S. importers by source, in 2019**

Firm	Headquarters	Share of imports by source (percent)		
		Subject Sources	Nonsubject Sources	All import sources
A.G. Royce	Sunrise, FL	***	***	***
Amsysco	Romeoville, IL	***	***	***
Athamor	Houston, TX	***	***	***
Freyssinet	Sterling, VA	***	***	***
Intermetal	Miami, FL	***	***	***
Mid-State	Cranbury, NJ	***	***	***
Philadelphia Post	Tucker, GA	***	***	***
Siam	Rayong,	***	***	***
Tata Steel	Schaumburg, IL	***	***	***
Westco	San Francisco, CA	***	***	***
All firms		***	***	***

Note.—Shares and ratios 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 PC strand from subject sources and all other sources. U.S. imports of PC strand from subject sources increased 17.7 percent by quantity, and 37.7 percent by value from 2017 to 2019. During the same period, U.S. imports of PC strand from nonsubject sources decreased by 22.5 percent by quantity, and decreased by 5.5 percent by value. The largest nonsubject source of U.S. imports of PC strand during 2017-19 was Portugal.<sup>5</sup>

Average unit values of U.S. imports from subject sources increased by 17.0 percent from 2017 to 2019. Average unit values of U.S. imports from nonsubject sources increased by 22.5 percent. Overall, the increase in average unit values from all import sources was 17.3 percent during the same time period.

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<sup>5</sup> According to Official imports statistics Portugal account for 88.9 percent of all nonsubject imports.

Malaysia and South Africa were the largest sources of subject U.S. imports of PC strand, accounting for 21.6 percent and 13.3 percent of all import sources, by quantity, in 2019. Egypt, Netherlands and Ukraine were the smallest sources of subject imports, accounting for 0.3 percent, 0.9 percent, and 0.9 percent respectively, of all import sources, by quantity, in 2019. U.S. imports of PC strand from nonsubject sources were 10.6 percent by quantity in 2019.

U.S. imports of PC strand as a ratio to U.S. production increased by 9.0 percentage points for subject sources and decreased by 1.1 percentage points for nonsubject sources from 2017 to 2019. Overall, the ratio of total U.S. imports of PC strand to U.S. production increased by 7.9 percentage points from 2017 to 2019.

**Table IV-2**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. imports from.--			
Argentina	---	2,196	6,125
Colombia	26,649	24,241	23,840
Egypt	---	---	968
Indonesia	634	10,350	13,890
Italy	21,227	14,819	24,305
Malaysia	70,651	68,456	67,779
Netherlands	3,133	1,978	2,888
Saudi Arabia	7,732	18,591	3,647
South Africa	20,422	20,367	17,905
Spain	26,609	15,852	41,812
Taiwan	2,589	10,676	6,288
Tunisia	22,991	25,373	25,173
Turkey	30,378	27,889	35,971
Ukraine	529	4,385	2,796
UAE	4,542	612	6,884
Subject sources	238,086	245,786	280,272
Nonsubject sources	42,710	39,750	33,094
All import sources	280,796	285,536	313,366

Table continued on next page.

**Table IV-2—Continued**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
U.S. imports from.--			
Argentina	---	1,083	2,599
Colombia	9,156	10,594	9,846
Egypt	---	---	372
Indonesia	213	4,416	5,380
Italy	7,379	7,382	10,984
Malaysia	23,838	30,263	27,129
Netherlands	1,907	1,300	1,800
Saudi Arabia	2,575	7,698	1,422
South Africa	7,023	9,063	7,490
Spain	9,437	7,703	16,501
Taiwan	1,014	5,092	3,056
Tunisia	7,683	10,967	9,900
Turkey	10,580	12,603	14,311
Ukraine	187	1,836	987
UAE	1,891	250	2,359
Subject sources	82,884	110,251	114,134
Nonsubject sources	15,609	19,343	14,813
All import sources	98,492	129,594	128,947

Table continued on next page.

**Table IV-2—Continued**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
U.S. imports from.--			
Argentina	---	493	424
Colombia	344	437	413
Egypt	---	---	384
Indonesia	336	427	387
Italy	348	498	452
Malaysia	337	442	400
Netherlands	609	657	623
Saudi Arabia	333	414	390
South Africa	344	445	418
Spain	355	486	395
Taiwan	392	477	486
Tunisia	334	432	393
Turkey	348	452	398
Ukraine	353	419	353
UAE	416	408	343
Subject sources	348	449	407
Nonsubject sources	365	487	448
All import sources	351	454	411

Table continued on next page.

**Table IV-2—Continued**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of quantity (percent)</b>		
U.S. imports from.--			
Argentina	---	0.8	2.0
Colombia	9.5	8.5	7.6
Egypt	---	---	0.3
Indonesia	0.2	3.6	4.4
Italy	7.6	5.2	7.8
Malaysia	25.2	24.0	21.6
Netherlands	1.1	0.7	0.9
Saudi Arabia	2.8	6.5	1.2
South Africa	7.3	7.1	5.7
Spain	9.5	5.6	13.3
Taiwan	0.9	3.7	2.0
Tunisia	8.2	8.9	8.0
Turkey	10.8	9.8	11.5
Ukraine	0.2	1.5	0.9
UAE	1.6	0.2	2.2
Subject sources	84.8	86.1	89.4
Nonsubject sources	15.2	13.9	10.6
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table IV-2—Continued**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of value (percent)</b>		
U.S. imports from.--			
Argentina	---	0.8	2.0
Colombia	9.3	8.2	7.6
Egypt	---	---	0.3
Indonesia	0.2	3.4	4.2
Italy	7.5	5.7	8.5
Malaysia	24.2	23.4	21.0
Netherlands	1.9	1.0	1.4
Saudi Arabia	2.6	5.9	1.1
South Africa	7.1	7.0	5.8
Spain	9.6	5.9	12.8
Taiwan	1.0	3.9	2.4
Tunisia	7.8	8.5	7.7
Turkey	10.7	9.7	11.1
Ukraine	0.2	1.4	0.8
UAE	1.9	0.2	1.8
Subject sources	84.2	85.1	88.5
Nonsubject sources	15.8	14.9	11.5
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table IV-2—Continued**  
**PC Strand: U.S. imports by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Ratio to U.S. production</b>		
U.S. imports from.--			
Argentina	---	0.3	1.0
Colombia	3.9	3.4	3.7
Egypt	---	---	0.2
Indonesia	0.1	1.5	2.2
Italy	3.1	2.1	3.8
Malaysia	10.4	9.6	10.6
Netherlands	0.5	0.3	0.5
Saudi Arabia	1.1	2.6	0.6
South Africa	3.0	2.9	2.8
Spain	3.9	2.2	6.5
Taiwan	0.4	1.5	1.0
Tunisia	3.4	3.6	3.9
Turkey	4.5	3.9	5.6
Ukraine	0.1	0.6	0.4
UAE	0.7	0.1	1.1
Subject sources	34.9	34.5	43.9
Nonsubject sources	6.3	5.6	5.2
All import sources	41.2	40.1	49.1

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.



**Figure IV-1**  
**PC strand: U.S. import quantities and average unit values, 2017-19**

\* \* \* \* \*

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>6</sup> 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 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.<sup>7</sup>

From April 2019 to March 2020, the most recent 12-month period preceding the filing of the petitions in these investigations, imports from Colombia, Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia and Turkey individually accounted for more than three percent of total U.S. imports of PC strand. While imports from Argentina, Egypt, Netherlands, Saudi Arabia, Taiwan, Ukraine and UAE individually accounted for less than 3 percent of the total volume, collectively they accounted for 9.0 percent of the quantity of total U.S. imports of PC strand during April 2019 to March 2020. Table IV-3 presents the individual shares of total imports accounted for by subject countries by quantity during April 2019 to March 2020 based on official U.S. import statistics.

Table IV-4 and figure IV-2 presents U.S imports in various 12 months periods in the lead-up to the negligibility period for Saudi Arabia and Taiwan compared to all import sources. Saudi Arabia was below the negligibility threshold for the last 6 months of the 16 month period. Taiwan was below the negligibly threshold for the last 8 months of the 16 month period.

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<sup>6</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

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

**Table IV-3****PC strand: U.S. imports in the twelve-month period preceding the filing of the petition, April 2019 to March 2020**

Item	April 2019 through March 2020		
	Quantity (1,000 pounds)	Share quantity (percent)	Share of quantity of individually negligible sources (percent)
U.S. imports from.--			
Argentina	3,556	1.1	1.1
Colombia	20,768	6.7	---
Egypt	1,591	0.5	0.5
Indonesia	10,066	3.2	---
Italy	23,777	7.6	---
Malaysia	68,483	22.0	---
Netherlands	3,018	1.0	1.0
Saudi Arabia	7,017	2.2	2.2
South Africa	19,930	6.4	---
Spain	44,505	14.3	---
Taiwan	6,569	2.1	2.1
Tunisia	24,028	7.7	---
Turkey	36,071	11.6	---
Ukraine	3,113	1.0	1.0
UAE	3,072	1.0	1.0
Subject sources	275,564	88.3	9.0
Nonsubject sources	36,417	11.7	---
All import sources	311,981	100.0	---

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

**Table IV-4**  
**PC strand: U.S imports in various 12 month period in the lead-up to the negligibility period for select sources**

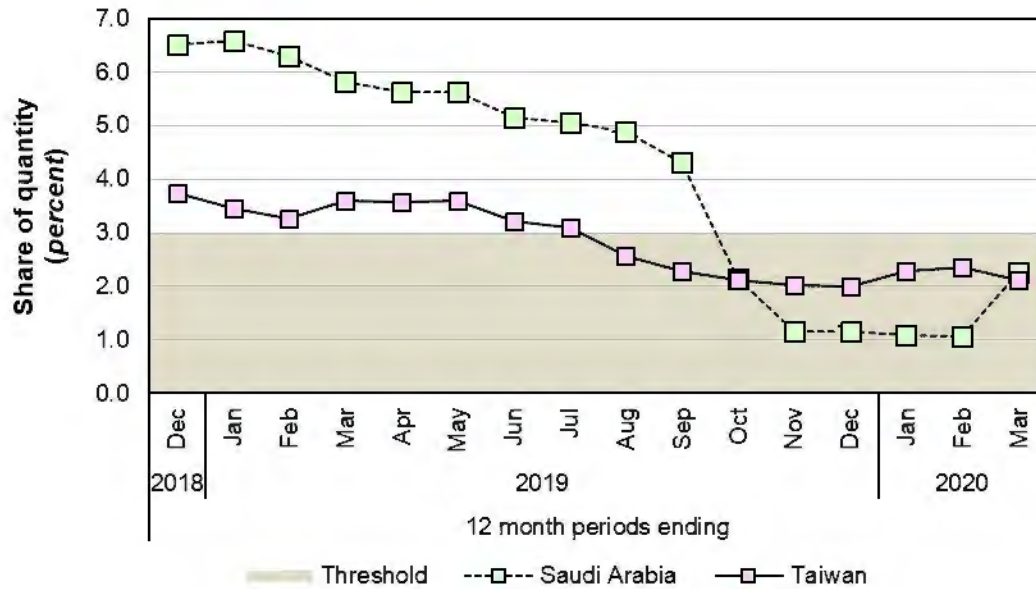
Item	U.S. imports					
	Saudi Arabia	Taiwan	All import source	Saudi Arabia	Taiwan	All import source
	Quantity (1,000 pounds)			Share of quantity (percent)		
12 months ending in.-- December 2018 (calendar year 2018)	18,591	10,676	285,536	6.5	3.7	100.0
January 2019	19,441	10,187	295,250	6.6	3.5	100.0
February	18,789	9,744	298,335	6.3	3.3	100.0
March	18,300	11,309	314,500	5.8	3.6	100.0
April	18,300	11,608	324,589	5.6	3.6	100.0
May	18,865	12,051	334,857	5.6	3.6	100.0
June	17,556	10,960	341,043	5.1	3.2	100.0
July	17,141	10,536	339,644	5.0	3.1	100.0
August	16,352	8,556	333,798	4.9	2.6	100.0
September	14,043	7,441	324,999	4.3	2.3	100.0
October	6,782	6,734	317,669	2.1	2.1	100.0
November	3,647	6,288	312,043	1.2	2.0	100.0
December (i.e., calendar year 2019)	3,647	6,288	313,366	1.2	2.0	100.0
January 2020	3,332	6,973	305,554	1.1	2.3	100.0
February	3,332	7,444	315,022	1.1	2.4	100.0
March (negligibility period)	7,017	6,569	311,981	2.2	2.1	100.0

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

Figure IV-2

PC strand: U.S. imports in various 12 month period in the lead-up to the negligibility period for select sources



Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

## Cumulation considerations

In assessing whether imports should be cumulated, the Commission determines whether U.S. imports from the subject countries compete with each other and with the domestic like product and has generally considered four factors: (1) fungibility, (2) presence of sales or offers to sell in the same geographical markets, (3) common or similar channels of distribution, and (4) simultaneous presence in the market. Information regarding channels of distribution, market areas, and interchangeability appear in Part II. Additional information concerning fungibility, geographical markets, and simultaneous presence in the market is presented below.

## **Fungibility**

The Commission requested information concerning U.S. producers' and U.S. importers' U.S. shipments of PC strand, by product type, for calendar year 2019. These data are presented in table IV-5 and figure IV-3.

The shares of reported U.S. producers' U.S. shipments of pre-tension and post-tension product accounted for 67.3 percent and 32.7 percent of total U.S. producer shipments, respectively. Post-tension was the largest share of reported U.S. shipments of U.S. imports from both subject and nonsubject sources.

**Table IV-5**  
**PC strand: U.S. producers' and U.S. importers' U.S. shipments by Item, 2019**

Item	U.S. shipments		
	Pre-tension	Post-tension	Total
	Quantity (1,000 pounds)		
U.S. producers' U.S. shipments	431,474	209,679	641,153
U.S. importers' U.S. shipments.--			
Argentina	***	***	***
Colombia	***	***	***
Egypt	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Netherlands	***	***	***
Saudi Arabia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Tunisia	***	***	***
Turkey	***	***	***
Ukraine	***	***	***
UAE	***	***	***
Subject sources	41,242	191,838	233,080
Nonsubject sources	12,349	20,756	33,105
All import sources	53,591	212,594	266,185
U.S. producers and U.S. importers	485,065	422,273	907,338

Table continued on next page.

**Table IV-5—Continued**  
**PC strand: U.S. producers' and U.S. importers' U.S. shipments by Item, 2019**

Item	U.S. shipments		
	Pre-tension	Post-tension	Total
	<b>Share across (percent)</b>		
U.S. producers' U.S. shipments	67.3	32.7	100.0
U.S. importers' U.S. shipments.--			
Argentina	***	***	***
Colombia	***	***	***
Egypt	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Netherlands	***	***	***
Saudi Arabia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Tunisia	***	***	***
Turkey	***	***	***
Ukraine	***	***	***
UAE	***	***	***
Subject sources	17.7	82.3	100.0
Nonsubject sources	37.3	62.7	100.0
All import sources	20.1	79.9	100.0
U.S. producers and U.S. importers	53.5	46.5	100.0

Table continued on next page.



**Table IV-5—Continued**  
**PC strand: U.S. producers' and U.S. importers' U.S. shipments by Item, 2019**

Item	U.S. shipments		
	Pre-tension	Post-tension	Total
	<b>Share down (percent)</b>		
U.S. producers' U.S. shipments	89.0	49.7	70.7
U.S. importers' U.S. shipments.--			
Argentina	***	***	***
Colombia	***	***	***
Egypt	***	***	***
Indonesia	***	***	***
Italy	***	***	***
Malaysia	***	***	***
Netherlands	***	***	***
Saudi Arabia	***	***	***
South Africa	***	***	***
Spain	***	***	***
Taiwan	***	***	***
Tunisia	***	***	***
Turkey	***	***	***
Ukraine	***	***	***
UAE	***	***	***
Subject sources	8.5	45.4	25.7
Nonsubject sources	2.5	4.9	3.6
All import sources	11.0	50.3	29.3
U.S. producers and U.S. importers	100.0	100.0	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.

**Figure IV-3**

**PC strand: U.S. producers' and U.S. importers' U.S. shipments by Item, 2019**

\* \* \* \* \*

**Geographical markets**

PC strand produced in the United States is shipped nationwide.<sup>8</sup> In 2019, official import statistics show that 61.5 percent of subject imports entered through the Southern border of entry of the United States, followed by the Western, Eastern, and Northern borders of entry with 26.5, 10.0, and 2.0 percent, respectively. Imports from all subject sources entered the Southern U.S region in 2019, with the exception of Taiwan, from which subject imports only entered the United States through the Western border of entry in 2019. In 2019, subject imports from Malaysia accounted for 67.7 percent of import of PC strand that entered the United States through the Western border with the largest amount of PC strand by quantity at 52.2 million pounds. Table IV-6 presents U.S. import quantities of PC strand sources and border of entry during 2019.<sup>9</sup>

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<sup>8</sup> See Part II for additional information on geographic markets.

<sup>9</sup> The “East” border of entry includes the following Customs entry districts for PC strand: Baltimore, MD; Charleston, SC; Charlotte, NC; New York, NY; Norfolk, VA; Ogdensburg, NY; Philadelphia, PA; Savannah, GA; and St. Albans, VT. The “North” border of entry includes the following Customs entry districts for PC strand: Chicago, IL; Cleveland, OH; Detroit, MI; Great Falls, MT; Minneapolis, MN; and St. Louis, MO. The “South” border of entry includes the following Customs entry districts for PC strand: Dallas-Fort Worth, TX; Houston-Galveston, TX; Miami, FL; New Orleans, LA; and Tampa, FL. The “West” border of entry includes the following Customs entry districts for PC strand: Los Angeles, CA; San Francisco, CA; and Seattle, WA.

**Table IV-6**  
**PC strand: U.S. imports by border of entry, 2019**

Item	Border of entry				
	East	North	South	West	All borders
	<b>Quantity (1,000 pounds)</b>				
U.S. imports from.--					
Argentina	447	---	5,233	445	6,125
Colombia	---	---	22,011	1,829	23,840
Egypt	---	---	968	---	968
Indonesia	---	---	1,291	12,600	13,890
Italy	3,423	172	20,040	670	24,305
Malaysia	1,483	---	14,093	52,203	67,779
Netherlands	500	---	2,388	---	2,888
Saudi Arabia	856	---	2,521	270	3,647
South Africa	---	---	17,905	---	17,905
Spain	7,794	5,408	28,611	---	41,812
Taiwan	---	---	---	6,288	6,288
Tunisia	5,063	---	20,110	---	25,173
Turkey	5,775	---	30,195	---	35,971
Ukraine	---	---	2,796	---	2,796
UAE	2,773	---	4,111	---	6,884
Subject sources	28,115	5,579	172,273	74,305	280,272
Nonsubject sources	151	7	30,094	2,841	33,094
All import sources	28,266	5,586	202,367	77,147	313,366

Table continued on next page.

**Table IV-6—Continued**  
**PC strand: U.S. imports by border of entry, 2019**

Item	Border of entry				
	East	North	South	West	All borders
	<b>Share across (percent)</b>				
U.S. imports from.--					
Argentina	7.3	---	85.4	7.3	100.0
Colombia	---	---	92.3	7.7	100.0
Egypt	---	---	100.0	---	100.0
Indonesia	---	---	9.3	90.7	100.0
Italy	14.1	0.7	82.5	2.8	100.0
Malaysia	2.2	---	20.8	77.0	100.0
Netherlands	17.3	---	82.7	---	100.0
Saudi Arabia	23.5	---	69.1	7.4	100.0
South Africa	---	---	100.0	---	100.0
Spain	18.6	12.9	68.4	---	100.0
Taiwan	---	---	---	100.0	100.0
Tunisia	20.1	---	79.9	---	100.0
Turkey	16.1	---	83.9	---	100.0
Ukraine	---	---	100.0	---	100.0
UAE	40.3	---	59.7	---	100.0
Subject sources	10.0	2.0	61.5	26.5	100.0
Nonsubject sources	0.5	0.0	90.9	8.6	100.0
All import sources	9.0	1.8	64.6	24.6	100.0

Table continued on next page.

**Table IV-6—Continued**  
**PC strand: U.S. imports by border of entry, 2019**

Item	Border of entry				
	East	North	South	West	All borders
	Share down (percent)				
U.S. imports from.--					
Argentina	1.6	---	2.6	0.6	2.0
Colombia	---	---	10.9	2.4	7.6
Egypt	---	---	0.5	---	0.3
Indonesia	---	---	0.6	16.3	4.4
Italy	12.1	3.1	9.9	0.9	7.8
Malaysia	5.2	---	7.0	67.7	21.6
Netherlands	1.8	---	1.2	---	0.9
Saudi Arabia	3.0	---	1.2	0.4	1.2
South Africa	---	---	8.8	---	5.7
Spain	27.6	96.8	14.1	---	13.3
Taiwan	---	---	---	8.2	2.0
Tunisia	17.9	---	9.9	---	8.0
Turkey	20.4	---	14.9	---	11.5
Ukraine	---	---	1.4	---	0.9
UAE	9.8	---	2.0	---	2.2
Subject sources	99.5	99.9	85.1	96.3	89.4
Nonsubject sources	0.5	0.1	14.9	3.7	10.6
All import sources	100.0	100.0	100.0	100.0	100.0

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

## Presence in the market

Table IV-7 and figure IV-4 present monthly official U.S. import statistics for subject countries and nonsubject sources. The monthly import statistics indicate that U.S. imports of PC strand from two of the subject countries, Malaysia, and Turkey, were present in each month during January 2017 to March 2020. Imports from Colombia, Italy and Spain were present for 38 months of the 39 month period. Imports from Tunisia were present for 35 months, imports from Netherlands were present for 32 months and imports from South Africa were present for 30 months of the 39 month period. With respect to subject imports, imports from UAE (11 of 39 months), Argentina (11 of 39 months) and Egypt (5 of 39 months), entered the United States in fewer than half the months during January 2017 to March 2020.

**Table IV-7**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

U.S. imports	Argentina	Colombia	Egypt	Indonesia	Italy	Malaysia
Quantity (1,000 pounds)						
2017.--						
January	---	2,466	---	---	520	4,789
February	---	476	---	195	1,231	6,259
March	---	3,136	---	---	2,011	5,895
April	---	1,899	---	---	2,588	4,544
May	---	3,003	---	---	3,756	6,670
June	---	2,669	---	217	1,530	4,500
July	---	1,669	---	222	1,996	6,188
August	---	2,022	---	---	1,736	7,190
September	---	2,860	---	---	3,578	6,050
October	---	1,227	---	---	1,831	6,361
November	---	3,693	---	---	184	5,984
December	---	1,530	---	---	267	6,222
2018.--						
January	---	2,960	---	---	273	5,940
February	---	905	---	---	93	4,175
March	---	2,459	---	---	342	5,576
April	---	1,142	---	209	959	4,426
May	235	925	---	723	---	7,284
June	---	3,027	---	628	700	5,352
July	422	2,569	---	2,460	2,655	5,631
August	656	3,404	---	1,980	3,057	8,261
September	---	2,469	---	1,105	1,550	4,819
October	659	2,941	---	1,038	1,399	6,358
November	---	1,440	---	1,621	3,276	7,331
December	223	---	---	586	515	3,303

Table continued on next page.

**Table IV-7—Continued**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

<b>U.S. imports</b>	<b>Argentina</b>	<b>Colombia</b>	<b>Egypt</b>	<b>Indonesia</b>	<b>Italy</b>	<b>Malaysia</b>
<b>Quantity (1,000 pounds)</b>						
2019.--						
January	1,349	2,434	---	1,251	2,402	7,061
February	---	1,753	---	927	1,595	2,610
March	1,220	2,228	---	2,017	3,937	5,012
April	671	2,629	---	2,651	3,034	4,778
May	---	2,054	137	1,446	3,052	8,796
June	1,050	2,190	---	1,294	1,994	7,562
July	1,388	2,018	---	622	1,544	5,967
August	447	1,810	272	1,448	2,273	5,780
September	---	1,529	---	---	1,379	5,159
October	---	2,201	104	775	1,072	5,597
November	---	1,933	---	1,095	1,238	6,171
December	---	1,061	455	365	786	3,287
2020.--						
January	---	728	---	370	1,626	3,732
February	---	1,667	---	---	1,933	5,355
March	---	947	623	---	3,847	6,300

Table continued on next page.

**Table IV-7—Continued**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

U.S. imports	Netherlands	Saudi Arabia	South Africa	Spain	Taiwan	Tunisia
	<b>Quantity (1,000 pounds)</b>					
2017.--						
January	485	---	---	1,571	445	2,740
February	285	---	2,659	2,065	447	1,964
March	438	284	1,451	2,739	451	1,307
April	390	---	928	2,171	---	2,420
May	301	1,118	1,635	3,903	445	1,788
June	299	1,095	4,639	5,799	---	1,566
July	68	2,371	2,391	1,288	---	2,450
August	147	471	1,456	3,007	---	1,258
September	277	822	---	2,925	266	2,580
October	141	---	353	1,010	266	3,032
November	---	---	236	86	269	1,887
December	303	1,571	4,674	43	---	---
2018.--						
January	---	---	3,388	81	489	2,572
February	---	651	2,461	85	667	1,409
March	---	1,065	---	---	---	2,241
April	---	---	2,582	709	593	1,831
May	149	---	---	1,613	448	4,337
June	165	1,310	3,454	1,752	2,003	3,238
July	320	1,216	1,325	1,425	894	2,159
August	240	790	2,153	2,467	1,979	1,335
September	331	2,308	2,212	2,234	1,562	3,218
October	165	7,835	1,979	1,210	1,596	---
November	330	3,417	---	1,382	445	630
December	278	---	814	2,895	---	2,404

Table continued on next page.



**Table IV-7—Continued**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

<b>U.S. imports</b>	<b>Netherlands</b>	<b>Saudi Arabia</b>	<b>South Africa</b>	<b>Spain</b>	<b>Taiwan</b>	<b>Tunisia</b>
	<b>Quantity (1,000 pounds)</b>					
2019.--						
January	144	849	997	4,289	---	2,781
February	168	---	---	2,982	224	1,510
March	217	576	2,041	2,488	1,565	2,249
April	329	---	2,371	3,645	892	3,584
May	497	565	69	5,548	891	2,577
June	141	---	2,824	3,368	913	1,976
July	---	802	1,568	3,052	469	3,692
August	400	---	1,972	3,767	---	4,010
September	331	---	---	4,379	447	1,713
October	333	574	3,952	2,286	889	---
November	---	282	---	2,105	---	---
December	329	---	2,112	3,904	---	1,082
2020.--						
January	167	533	3,444	3,291	685	564
February	325	---	1,619	4,732	695	3,219
March	166	4,261	---	4,428	690	1,612

Table continued on next page.

**Table IV-7—Continued**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

U.S. imports	Turkey	Ukraine	United Arab Emirates	Subject sources	Nonsubject sources	All import sources
Quantity (1,000 pounds)						
2017.--						
January	1,389	---	2,260	16,665	4,500	21,165
February	2,366	---	872	18,819	1,825	20,644
March	1,856	318	879	20,766	3,076	23,842
April	1,929	---	531	17,401	3,573	20,974
May	4,396	---	---	27,016	6,607	33,623
June	4,198	---	---	26,513	4,493	31,005
July	3,195	---	---	21,838	3,318	25,156
August	1,403	---	---	18,689	3,365	22,054
September	3,127	---	---	22,485	2,397	24,882
October	1,608	106	---	15,934	3,204	19,138
November	2,340	105	---	14,783	3,049	17,831
December	2,570	---	---	17,178	3,302	20,480
2018.--						
January	1,299	---	---	17,001	602	17,603
February	1,395	209	---	12,052	1,111	13,163
March	1,508	207	---	13,397	3,014	16,411
April	2,467	---	---	14,918	3,437	18,355
May	2,510	626	---	18,848	4,851	23,699
June	652	728	---	23,009	1,935	24,944
July	4,305	677	---	26,058	3,881	29,938
August	2,466	316	---	29,104	6,636	35,740
September	3,445	996	---	26,249	5,007	31,256
October	2,373	416	---	27,969	2,498	30,467
November	3,785	---	---	23,656	2,629	26,285
December	1,685	210	612	13,525	4,149	17,675

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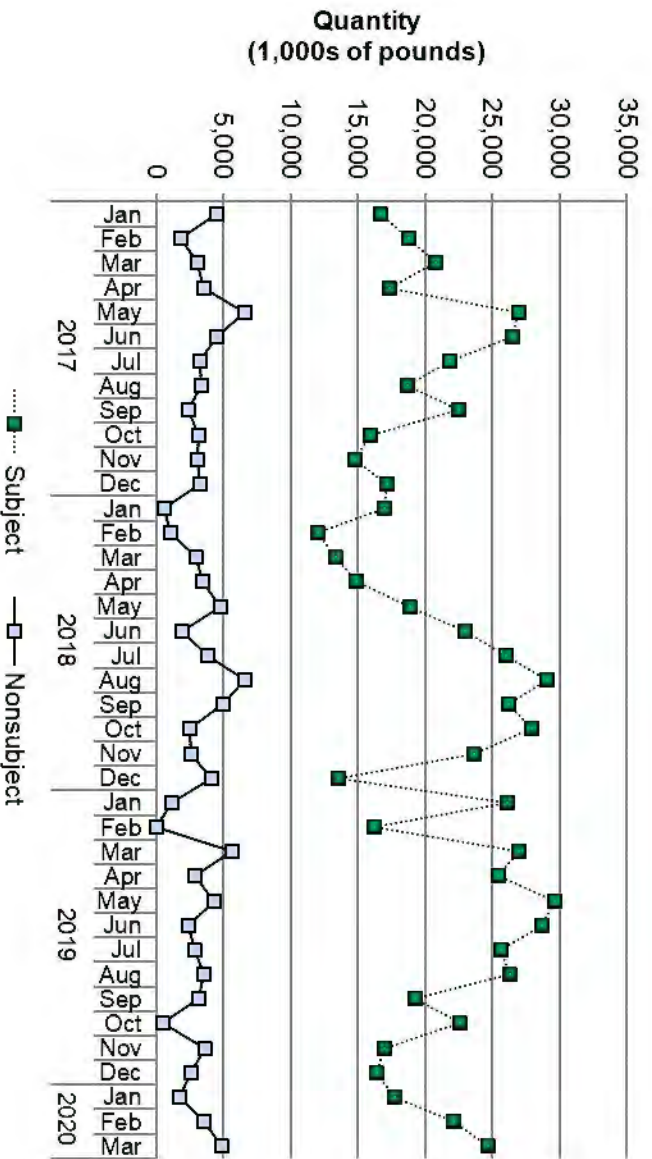
**Table IV-7—Continued**  
**PC strand: U.S. imports by month, January 2017 through March 2020**

U.S. imports	Turkey	Ukraine	United Arab Emirates	Subject sources	Nonsubject sources	All import sources
	<b>Quantity (1,000 pounds)</b>					
2019.--						
January	2,006	---	578	26,140	1,177	27,317
February	1,529	105	2,773	16,175	72	16,248
March	2,929	---	461	26,939	5,637	32,576
April	913	---	---	25,496	2,947	28,443
May	3,417	---	565	29,612	4,355	33,967
June	3,444	---	1,943	28,698	2,432	31,130
July	3,523	422	565	25,632	2,908	28,539
August	3,714	421	---	26,314	3,580	29,894
September	3,467	900	---	19,304	3,154	22,457
October	4,493	314	---	22,590	547	23,136
November	3,937	212	---	16,973	3,686	20,659
December	2,597	422	---	16,400	2,598	18,998
2020.--						
January	2,411	212	---	17,763	1,742	19,505
February	2,471	107	---	22,122	3,594	25,715
March	1,683	105	---	24,662	4,874	29,536

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

**Figure IV-4**  
**PC strand: U.S. imports from aggregated and nonsubject sources by month, January 2017 through March 2020**



Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.

### Apparent U.S. consumption

Table IV-8 and figure IV-5 present data on apparent U.S. consumption of PC strand for 2017 to 2019, based on questionnaire responses from U.S. producers and official import statistics. Apparent U.S. consumption increased by 0.8 percent by quantity, and 15.0 percent, by value, from 2017 to 2019.

**Table IV-8**  
**PC strand: Apparent U.S. consumption, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. producers' U.S. shipments	665,925	699,128	641,153
U.S. imports from.--			
Argentina	---	2,196	6,125
Colombia	26,649	24,241	23,840
Egypt	---	---	968
Indonesia	634	10,350	13,890
Italy	21,227	14,819	24,305
Malaysia	70,651	68,456	67,779
Netherlands	3,133	1,978	2,888
Saudi Arabia	7,732	18,591	3,647
South Africa	20,422	20,367	17,905
Spain	26,609	15,852	41,812
Taiwan	2,589	10,676	6,288
Tunisia	22,991	25,373	25,173
Turkey	30,378	27,889	35,971
Ukraine	529	4,385	2,796
UAE	4,542	612	6,884
Subject sources	238,086	245,786	280,272
Nonsubject sources	42,710	39,750	33,094
All import sources	280,796	285,536	313,366
Apparent U.S. consumption	946,721	984,664	954,519

Table continued on next page.

**Table IV-8—Continued**  
**PC strand: Apparent U.S. consumption, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
U.S. producers' U.S. shipments	293,184	360,384	321,393
U.S. imports from.--			
Argentina	---	1,083	2,599
Colombia	9,156	10,594	9,846
Egypt	---	---	372
Indonesia	213	4,416	5,380
Italy	7,379	7,382	10,984
Malaysia	23,838	30,263	27,129
Netherlands	1,907	1,300	1,800
Saudi Arabia	2,575	7,698	1,422
South Africa	7,023	9,063	7,490
Spain	9,437	7,703	16,501
Taiwan	1,014	5,092	3,056
Tunisia	7,683	10,967	9,900
Turkey	10,580	12,603	14,311
Ukraine	187	1,836	987
UAE	1,891	250	2,359
Subject sources	82,884	110,251	114,134
Nonsubject sources	15,609	19,343	14,813
All import sources	98,492	129,594	128,947
Apparent U.S. consumption	391,676	489,978	450,340

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

Source: Compiled from official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020 and from data submitted in response to Commission questionnaires.

**Figure IV-5**  
**PC strand: Apparent U.S. consumption, 2017-19**

\* \* \* \* \*

## **U.S. market shares**

U.S. market share data for PC strand are presented in table IV-9. U.S. producers' share of apparent U.S. consumption by quantity, increased from 70.3 percent in 2017 to 71.0 percent in 2018 before decreasing to 67.2 in 2019. U.S. producers' share of apparent U.S. consumption by value, decreased from 74.9 percent in 2017 to 73.6 percent in 2018, and kept decreasing to 71.4 in 2019. Subject imports' share of the U.S. market by quantity decreased slightly from 25.1 percent in 2017 to 25.0 percent in 2018 and increased to 29.4 percent in 2019. Their share of the U.S. market by value, increased from 21.2 percent in 2017 to 22.5 percent in 2018 and 25.3 percent in 2019. Meanwhile, the share of nonsubject imports declined from 4.5 percent in 2017 to 4.0 percent in 2018 and 3.5 percent in 2019, by quantity, and from 4.0 percent in 2017 to 3.9 percent in 2018 and 3.3 percent in 2019, by value.

**Table IV-9**  
**PC strand: Market shares, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
Apparent U.S. consumption	946,721	984,664	954,519
	<b>Share of quantity (percent)</b>		
U.S. producers' U.S. shipments	70.3	71.0	67.2
U.S. importers' U.S. shipments from.--			
Argentina	---	0.2	0.6
Colombia	2.8	2.5	2.5
Egypt	---	---	0.1
Indonesia	0.1	1.1	1.5
Italy	2.2	1.5	2.5
Malaysia	7.5	7.0	7.1
Netherlands	0.3	0.2	0.3
Saudi Arabia	0.8	1.9	0.4
South Africa	2.2	2.1	1.9
Spain	2.8	1.6	4.4
Taiwan	0.3	1.1	0.7
Tunisia	2.4	2.6	2.6
Turkey	3.2	2.8	3.8
Ukraine	0.1	0.4	0.3
UAE	0.5	0.1	0.7
Subject sources	25.1	25.0	29.4
Nonsubject sources	4.5	4.0	3.5
All import sources	29.7	29.0	32.8

Table continued on next page.



**Table IV-9—Continued**  
**PC strand: Market shares, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
Apparent U.S. consumption	391,676	489,978	450,340
	<b>Share of value (percent)</b>		
U.S. producers' U.S. shipments	74.9	73.6	71.4
U.S. importers' U.S. shipments from.--			
Argentina	---	0.2	0.6
Colombia	2.3	2.2	2.2
Egypt	---	---	0.1
Indonesia	0.1	0.9	1.2
Italy	1.9	1.5	2.4
Malaysia	6.1	6.2	6.0
Netherlands	0.5	0.3	0.4
Saudi Arabia	0.7	1.6	0.3
South Africa	1.8	1.8	1.7
Spain	2.4	1.6	3.7
Taiwan	0.3	1.0	0.7
Tunisia	2.0	2.2	2.2
Turkey	2.7	2.6	3.2
Ukraine	0.0	0.4	0.2
UAE	0.5	0.1	0.5
Subject sources	21.2	22.5	25.3
Nonsubject sources	4.0	3.9	3.3
All import sources	25.1	26.4	28.6

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

Source: Compiled from official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020 and from data submitted in response to Commission questionnaires.



# Part V: Pricing data

## Factors affecting prices

### Raw material costs

PC strand is produced in two types, low-relaxation and stress-relieved, in three grades, covered and uncovered form, and different diameters.<sup>1</sup> Covered PC strand can be epoxy coated or lubricated with grease and sheathed in a plastic coating.<sup>2</sup> The main raw material used to manufacture PC strand is hot-rolled, high-carbon steel wire rod.<sup>3</sup> Raw materials, as a percentage of the costs of goods sold (“COGS”), fluctuated during 2017-19, and accounted for \*\*\* percent of COGS in 2019.

Three of five responding U.S. producers indicated that raw material prices had increased since January 2017, while two firms reported that they had fluctuated.<sup>4</sup> Most importers (four of six responding firms) reported that raw material prices had fluctuated, one indicated that prices had decreased, and one reported no change in raw material prices.<sup>5</sup> As shown in figure V-1, prices of high carbon steel wire rod have fluctuated over 2017 to 2019. Wire rod prices increased sharply in April 2018, after the imposition of the section 232 tariffs. Wire rod prices began to decline in April 2019 but were still \*\*\* percent higher in December 2019 than they were in January 2017. From December 2019 to March 2020, wire rod prices have increased by \*\*\* percent.

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<sup>1</sup> Petition, p. 13.

<sup>2</sup> Petition, p. 13.

<sup>3</sup> Wire rod accounted for \*\*\* percent of U.S. producers’ raw material costs.

<sup>4</sup> U.S. producers \*\*\* cited the section 232 tariffs for increasing raw material prices, as well as antidumping duties on other upstream products such as hot-rolled wire rod. \*\*\* reported that the subject import price pressure did not allow it to raise prices from “periods of rising wire rod costs.”

<sup>5</sup> Importers \*\*\* reported that they incorporated changes in the price of raw materials into their sales prices. Both firms reported that raw material prices had fluctuated since January 2017.

**Figure V-1**  
**High carbon steel wire rod: Monthly average fob mill U.S. price, January 2017 through March 2020**

\* \* \* \* \*

Source: American Metal Market, [www.amm.com](http://www.amm.com), retrieved April 28, 2020.

### **Impact of section 232 tariffs on raw material prices**

Imports of wire rod, the main raw material used to manufacture PC strand, have been subject to section 232 tariffs beginning on March 23, 2018.<sup>6 7</sup> Most U.S. producers (three of five) and importers (four of six) reported that the section 232 tariffs had increased raw material prices. Two U.S. producers and one importer reported that the section 232 tariffs had caused raw material prices to fluctuate, and one importer reported that the section 232 tariffs had not caused any changes in the price of raw materials. Firms were divided on the impact of the section 232 tariffs on PC strand prices. Two U.S. producers (\*\*\*) reported that the section 232 tariffs had caused PC strand prices to fluctuate, two (\*\*\*) reported that they had caused prices to decrease, and one (\*\*\*) reported that the 232

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<sup>6</sup> The section 232 tariffs imposed a 25 percent ad valorem duty on imports of steel mill products and a 10 percent ad valorem additional duty for imports of aluminum products. *Adjusting Imports of Steel Into the United States*, 83 FR 11625, March 15, 2018; and *Adjusting Imports of Aluminum Into the United States*, 83 FR 11619, March 15, 2018.

<sup>7</sup> Petitioners also noted that the section 232 tariffs followed antidumping and countervailing duties on imports of wire rod from Belarus, Italy, Korea, Russia, South Africa, Spain, Turkey, Ukraine, the UAE and the United Kingdom in 2018. Petitioners' postconference brief, Exhibit 1, p. 13.

tariffs had increased PC strand prices.<sup>8</sup> Three of six responding importers reported that the section 232 tariffs had not had an impact on PC strand prices, two reported PC strand prices fluctuated, and two reported PC strand prices increased due to the section 232 tariffs. Importer \*\*\* stated that there was an increase in steel prices after the section 232 tariffs were imposed, but prices began a “steady decline” afterwards.

## **Transportation costs to the U.S. market**

Transportation costs for PC strand shipped from subject countries to the United States averaged 4.8 percent for all subject countries combined and ranged from 0.3 percent (Indonesia) to 13.2 percent (Argentina) during 2019. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>9</sup>

## **U.S. inland transportation costs**

All responding U.S. producers and importers reported that they typically arrange transportation to their customers. U.S. producers reported that their U.S. inland transportation costs ranged from 4 to 8 percent while importers reported costs of 2 to 10 percent.

## **Pricing practices**

### **Pricing methods**

U.S. producers and importers reported using transaction-by-transaction negotiations, contracts,<sup>10</sup> set price lists, and quarterly offers on a case-by-case basis. As presented in table V-1, U.S. producers sell primarily on transaction-by-transaction negotiations and most importers sell through transaction-by-transaction negotiations and/or through contracts.

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<sup>8</sup> U.S. producer \*\*\* stated that it had to announce PC strand price increases due to price increases of hot-rolled wire rod and “other cost inputs” resulting from the section 232 tariffs. It indicated that its PC strand price increases did not keep pace with rising raw material costs.

<sup>9</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2019 and then dividing by the customs value based on the HTS subheading 7312.10.3010 and 7312.10.3012.

<sup>10</sup> Importer \*\*\* reported it uses contracts with competitive bids.

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

Method	U.S. producers	Importers
Transaction-by-transaction	5	4
Contract	2	3
Set price list	1	---
Other	---	1
<b>Responding firms</b>	5	5

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.

U.S. producers and importers reported selling most of their PC strand under short-term contract, however U.S. producers sold a sizeable amount of product through spot sales (table V-2).

**Table V-2****PC strand: U.S. producers' and importers' shares of U.S. commercial shipments by type of sale, 2019**

Type of sale	U.S. producers	Importers
Long-term contracts	***	***
Annual contracts	***	***
Short-term contracts	***	***
Spot sales	***	***
Total	100.0	100.0

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 short-term contract durations averaged 30 or 90 days, and long-term contracts averaged 547 or 730 days. U.S. producers reported that their contracts typically do not allow for price renegotiation,<sup>11</sup> typically have a fixed price and quantity provision, and prices are not indexed to raw materials. Importers' reported short-term contract durations averaged 90 days. Importers also reported that prices are not renegotiated, prices and quantities are fixed, and prices are not indexed to raw materials.

## Sales terms and discounts

U.S. producers and importers typically quote prices on a delivered basis. U.S. producer \*\*\* offered quantity, total volume, and cash discounts, \*\*\* offered quantity

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<sup>11</sup> Two U.S. producers reported that prices are renegotiated in short-term contracts, three reported they are not renegotiated in short-term contracts, and all responding producers reported prices are not renegotiated in annual or long-term contracts.

discounts, and the remaining three responding U.S. producers did not provide any discounts.<sup>12</sup> Importers reported no discount policies.

## 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 PC strand products shipped to unrelated U.S. customers during January 2017 through December 2019.

**Product 1.**-- 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand.

**Product 2.**-- 1/2-inch, grade 270 (270,000 PSI), low-relaxation, covered prestressed concrete strand that is greased and covered in a polyethylene wrap.

All five U.S. producers and five importers provided usable pricing data for sales of product 1, although not all firms reported pricing data for all products for all quarters.<sup>13</sup> <sup>14</sup> No firms reported pricing data for product 2 that matched the product description.<sup>15</sup> No pricing data were reported for imports from the Netherlands, Saudi Arabia, Spain, or the United Arab Emirates. Pricing data reported by these firms accounted for approximately \*\*\* percent of U.S. producers' U.S. shipments of PC strand, \*\*\* percent of U.S. shipments of combined subject imports, and the following percentages of U.S. shipments of subject imports from each subject country in 2019:

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<sup>12</sup> U.S. producer \*\*\* indicated that its discount policy varies due to "competitive conditions driven by unfair imports."

<sup>13</sup> 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.

<sup>14</sup> Importer \*\*\* provided estimates of its pricing data based on its "best available reports," noting that it did not track its quarterly sales of PC strand by country of origin. It reported the same quarterly price per country but not the same price per quarter. This importer reported pricing data for product from Colombia, Egypt, Indonesia, Italy, Malaysia, South Africa, and Turkey and was \*\*\* to report pricing data for product from Colombia and South Africa.

<sup>15</sup> U.S. producer \*\*\* was the only firm to provide data under product 2, although it was outside the definition of pricing product 2. \*\*\*. Staff did not incorporate \*\*\* product 2 data in the pricing analysis. \*\*\*.

- Argentina – \*\*\* percent
- Colombia – \*\*\* percent
- Egypt – \*\*\* percent
- Indonesia – \*\*\* percent
- Italy – \*\*\* percent
- Malaysia – \*\*\* percent
- South Africa – \*\*\* percent
- Taiwan – \*\*\* percent
- Tunisia – \*\*\* percent
- Turkey – \*\*\* percent
- Ukraine – \*\*\* percent

Price data for product 1 are presented in table V-3 and price data for product 1 of U.S. producers and combined subject imports are presented in figure V-2.



Table V-3

PC strand: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-December 2019

Period	United States		Argentina			
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	
<b>2017:</b>						
Jan.-Mar.	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	
<b>2018:</b>						
Jan.-Mar.	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	
<b>2019:</b>						
Jan.-Mar.	***	***	***	***	***	
Apr.-Jun.	***	***	***	***	***	
Jul.-Sep.	***	***	***	***	***	
Oct.-Dec.	***	***	***	***	***	
Period	Colombia			Egypt		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
<b>2017:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2018:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2019:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Table continued on next page.

Table V-3- Continued

PC strand: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-December 2019

Period	Indonesia			Italy		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
<b>2017:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2018:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2019:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
Period	Malaysia			South Africa		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
<b>2017:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2018:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***
<b>2019:</b>						
Jan.-Mar.	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***

Table continued on next page.

Table V-3- Continued

PC strand: Weighted-average f.o.b. prices and quantities of domestic and imported product 1 and margins of underselling/(overselling), by quarter, January 2017-December 2019

Period	Taiwan			Tunisia					
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)			
<b>2017:</b>									
Jan.-Mar.	***	***	***	***	***	***			
Apr.-Jun.	***	***	***	***	***	***			
Jul.-Sep.	***	***	***	***	***	***			
Oct.-Dec.	***	***	***	***	***	***			
<b>2018:</b>									
Jan.-Mar.	***	***	***	***	***	***			
Apr.-Jun.	***	***	***	***	***	***			
Jul.-Sep.	***	***	***	***	***	***			
Oct.-Dec.	***	***	***	***	***	***			
<b>2019:</b>									
Jan.-Mar.	***	***	***	***	***	***			
Apr.-Jun.	***	***	***	***	***	***			
Jul.-Sep.	***	***	***	***	***	***			
Oct.-Dec.	***	***	***	***	***	***			
Period	Turkey			Ukraine			Combined subject sources		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
<b>2017:</b>									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
<b>2018:</b>									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***
<b>2019:</b>									
Jan.-Mar.	***	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***	***

Note: Product 1: 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand.

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

**Figure V-2**  
**PC strand: Weighted-average prices and quantities of domestic and imported product 1, by quarter, January 2017 through December 2019**

\* \* \* \* \*

\* \* \* \* \*

Product 1: 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand.

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

## Price trends

In general, prices increased during 2017-19. Table V-4 summarizes the price trends by country for product 1. As shown in the table, domestic prices increased by \*\*\* percent during 2017-19 while import prices for all subject countries combined increased by 16.0 percent. Individual subject country increases ranged from \*\*\* percent (Italy) to \*\*\* percent (Taiwan).

Indexed U.S. producer and combined subject import prices for product 1 show how prices increased from January 2017 to December 2019 (figures V-3 and V-4). U.S. producer prices and import prices of product 1 followed similar trends, steadily increasing through the first quarter of 2018, then increasing sharply<sup>16</sup> and continuing to increase through the end of 2018. Domestic and import prices of product 1 began to decline in the first quarter of 2019 and continued to decline through the end of 2019.

**Table V-4**

**PC strand: Number of quarters containing observations, low price, high price, and change in price over period for product 1, by source, January 2017 through December 2019**

Item	Number of quarters	Low price (dollars per pound)	High price (dollars per pound)	Change in price over period <sup>1</sup> (percent)
United States	12	***	***	***
Argentina	7	***	***	***
Colombia	12	***	***	***
Egypt	4	***	***	***
Indonesia	11	***	***	***
Italy	12	***	***	***
Malaysia	12	***	***	***
South Africa	12	***	***	***
Taiwan	12	***	***	***
Tunisia	12	***	***	***
Turkey	12	***	***	***
Ukraine	8	***	***	***
Subject	12	***	***	***

Note: Importers did not report any data for product from the Netherlands, Saudi Arabia, Spain, or the United Arab Emirates, and U.S. producers and importers did not report pricing data for product 2 that matched the product description.

Note: Change in price over period calculated when data was reported in the first quarter of 2017 and the last quarter of 2019.

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

---

<sup>16</sup> The section 232 tariffs on wire rod, the main input for PC strand, were implemented in March 2018.

**Figure V-3**

**PC strand: Indexed U.S. producer prices, product 1, January 2017 through December 2019**

\* \* \* \* \*

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

**Figure V-4**

**PC strand: Indexed subject importer prices, product 1, January 2017 through December 2019**

\* \* \* \* \*

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

## **Price comparisons**

As shown in table V-5, prices for product imported from subject sources were below those for U.S.-produced product in 91 of 115 instances (488.6 million pounds); margins of underselling ranged from 0.0 to 14.2 percent. Prices of product from all subject countries with reported price data, except for Taiwan, were below those of U.S.-produced product in the majority of comparisons. In the remaining 24 instances (105.5 million pounds), prices for product from subject sources were between 0.1 and 23.7 percent above prices for the domestic product.

**Table V-5**  
**PC strand: Instances of underselling/overselling and the range and average of margins for product 1, by country, January 2017 through December 2019**

Source	Underselling				
	Number of quarters	Quantity (1,000 pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Argentina	6	***	***	***	***
Colombia	9	***	***	***	***
Egypt	5	***	***	***	***
Indonesia	10	***	***	***	***
Italy	8	***	***	***	***
Malaysia	10	***	***	***	***
South Africa	9	***	***	***	***
Taiwan	4	***	***	***	***
Tunisia	12	***	***	***	***
Turkey	10	***	***	***	***
Ukraine	8	***	***	***	***
Total, underselling	91	488,567	4.5	0.0	14.2
Source	(Overselling)				
	Number of quarters	Quantity (1,000 pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Argentina	1	***	***	***	***
Colombia	3	***	***	***	***
Egypt	---	***	***	***	***
Indonesia	1	***	***	***	***
Italy	4	***	***	***	***
Malaysia	2	***	***	***	***
South Africa	3	***	***	***	***
Taiwan	8	***	***	***	***
Tunisia	---	***	***	***	***
Turkey	2	***	***	***	***
Ukraine	---	***	***	***	***
Total, overselling	24	105,524	(4.6)	(0.1)	(23.7)

Note: These data include only quarters in which there is a comparison between the U.S. and subject product. Importers did not report any data for product from the Netherlands, Saudi Arabia, Spain, or the United Arab Emirates, and U.S. producers and importers did not report pricing data for product 2.

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

## Lost sales and lost revenue

All five responding U.S. producers reported that they had to either reduce prices or roll back announced price increases and that they had lost sales. Three U.S. producers submitted



lost sales and lost revenue allegations. The three responding U.S. producers identified 29 firms with which they lost sales or revenue (11 consisting of lost sales allegations, 3 consisting of lost revenue allegations, and 15 consisting of both types of allegations).<sup>17</sup> Countries listed in one or more lost sales or lost revenue allegations include Argentina (8 allegations), Colombia (23), Egypt (1), Indonesia (9), Italy (21), Malaysia (27), the Netherlands (3), Saudi Arabia (11), South Africa (15), Spain (24), Taiwan (1), Tunisia (19), Turkey (20), Ukraine (1), and the United Arab Emirates (17).<sup>18</sup> Allegations covered 2017 to 2019, and almost all lost sales and lost revenues were reported as occurring during quarterly price negotiations or monthly sales or purchase orders.

Staff contacted 29 purchasers and received responses from 13 purchasers. Purchasers reported purchasing and importing 850.1 million pounds of PC strand from 2017-19 (table V-6). Responding firms' purchases and imports share by source for 2017-19 are presented in table V-7. Purchasers reported no purchases of PC strand from Ukraine from 2017 to 2019 and reported that less than 0.5 percent of their purchases were from Egypt and Saudi Arabia in 2019.

Purchasers were asked about changes in their purchasing patterns from different sources since 2017. Of the responding purchasers, six reported increasing purchases from domestic producers, five reported decreasing purchases, one reported no change, and one reported fluctuating purchases.<sup>19</sup> Table V-8 shows the purchasers' reported changes in purchasing patterns by country. Explanations for increasing purchases of domestic product included pricing and relationships, the decision to buy locally, customer preference, and an increase in demand for PC strand. Explanations for decreasing purchases of domestic product included domestic suppliers not participating in the post-tension market, higher domestic prices, fewer Buy-American orders, and decreased demand.

Of the 11 responding purchasers, 9 reported that, since 2017, they had purchased imported PC strand from subject countries instead of U.S.-produced product. All nine of these purchasers reported that subject import prices were lower than those of U.S.-produced product, and five of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product. Five purchasers estimated

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<sup>17</sup> Different U.S. producers alleged either a lost sale, revenue, or both against the same purchaser.

<sup>18</sup> Two allegations were made against "multiple subject countries."

<sup>19</sup> Of the 12 responding purchasers, one purchaser, \*\*\* indicated that it did not know the source of the PC strand it purchased. This purchaser reported purchasing \*\*\* from the United States and \*\*\* from unknown sources during 2017-19.

the quantity of PC strand from subject countries purchased instead of domestic product; quantities ranged from \*\*\* pounds to \*\*\* million pounds (tables V-9 and V-10). Purchasers identified relationships with vendors, service terms, and a new supplier trial as non-price reasons for purchasing imported rather than U.S.-produced product.

No purchasers reported that U.S. producers had reduced prices in order to compete with lower-priced imports from subject countries.<sup>20 21</sup>

**Table V-6**  
**PC strand: Purchasers' reported purchases and imports, 2017-19**

Purchaser	Purchases and imports in 2017-19 (1,000 pounds)			Change in domestic share <sup>2</sup> (pp, 2017-19)	Change in subject country share (pp, 2017-19)
	Domestic	Subject	All other		
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
<b>Total</b>	<b>477,513</b>	<b>178,080</b>	<b>194,540</b>	<b>(4.1)</b>	<b>7.0</b>

Note: All other includes all other sources and unknown sources.

Note: Percentage points (pp) change: Change in the share of the firm's total purchases of domestic and/or subject country imports between first and last years.

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

<sup>20</sup> Five purchasers reported that they did not know and two reported that U.S. producers did not reduce prices to compete with subject imports.

<sup>21</sup> Purchaser \*\*\* reported that U.S. producers have never negotiated price with it, and that it has “always been given a take it or leave it offer” by U.S. producers.

**Table V-7****PC strand: Purchasers' share of reported purchases and imports by country, 2017-19**

<b>Source</b>	<b>2017</b>	<b>2018</b>	<b>2019</b>
	<b>Share of quantity (percent)</b>		
United States	56.5	59.3	52.4
Argentina	---	---	0.1
Colombia	0.2	1.8	1.7
Egypt	---	---	0.0
Indonesia	2.1	2.8	2.7
Italy	0.6	0.4	0.9
Malaysia	3.4	3.7	6.4
Netherlands	0.1	---	0.1
Saudi Arabia	0.2	0.5	0.0
South Africa	1.3	1.8	1.3
Spain	6.2	2.7	6.3
Taiwan	---	0.1	---
Tunisia	2.7	2.8	2.5
Turkey	1.1	1.7	3.6
Ukraine	---	---	---
UAE	0.9	0.2	0.1
Subject sources	18.8	18.5	25.8
Nonsubject sources	4.5	2.1	1.2
Unknown sources	23.3	20.6	27.0
All import sources	20.2	20.1	20.6
Total	100.0	100.0	100.0

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

**Table V-8****PC strand: Purchasers' responses to purchasing patterns by country**

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	---	5	6	1	1
Argentina	8	---	---	1	---
Colombia	6	1	1	---	1
Egypt	8	---	1	---	---
Indonesia	6	---	2	2	---
Italy	4	2	2	1	---
Malaysia	1	1	2	3	3
Netherlands	7	1	1	---	---
Saudi Arabia	6	1	---	---	2
South Africa	6	2	1	---	---
Spain	3	---	3	2	1
Taiwan	8	---	---	1	---
Tunisia	4	1	1	1	2
Turkey	4	1	2	---	2
Ukraine	9	---	---	---	---
UAE	4	4	---	---	1
All other sources	4	1	2	---	2
Sources unknown	5	---	---	1	---

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

**Table V-9**

**PC strand: Purchasers' responses to purchasing subject imports instead of domestic product, by firm**

Purchaser	Subject imports purchased instead of domestic (Y/N)	Imports priced lower (Y/N)	If purchased subject imports instead of domestic, was price a primary reason		
			Y/N	If Yes, quantity (1,000 pounds)	If No, non-price reason
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
Total	Yes--9; No--2	Yes--9; No--0	Yes--5; No--4	56,252	

Note: Purchaser \*\*\* reported that its purchases of imported PC strand were “in addition to” purchases of domestic PC strand, not “instead of.” Purchaser \*\*\* indicated that it \*\*\* and did not respond to the question about purchasing subject imports rather than domestic product. Purchaser \*\*\* reported its subject quantities purchased instead of domestic product in feet and did not respond to staff’s request to report its quantities in pounds. These were converted to pounds using a conversion rate of 1 foot = 0.520 pounds. \*\*\* and \*\*\*.

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

**Table V-10****PC strand: Purchasers' responses to purchasing subject imports instead of domestic product, by country**

Source	Count of purchasers reporting purchasing subject instead of domestic	Count of purchasers reporting that imports were priced lower	Count of purchasers reporting that price was a primary reason for shift	Quantity subject purchased (1,000 pounds)
Argentina	---	---	---	***
Colombia	3	3	2	***
Egypt	1	1	---	***
Indonesia	4	4	4	***
Italy	5	4	2	***
Malaysia	8	8	3	***
Netherlands	1	---	---	***
Saudi Arabia	3	3	1	***
South Africa	3	2	1	***
Spain	5	2	2	***
Taiwan	---	---	---	***
Tunisia	4	2	2	***
Turkey	5	4	2	***
Ukraine	---	---	---	***
UAE	5	4	3	***
Subject sources	9	9	5	56,253

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

In responding to the lost sales lost revenue survey, some purchasers provided additional information on purchases and market dynamics. Regarding the role prices in purchasing PC strand, purchaser \*\*\* noted that quality is never an issue and that buying decisions come down to price and the ease of doing business, and \*\*\* reported that at times the domestic suppliers offered lower prices than imported product. \*\*\* reported that some customers prefer domestic product despite the higher price.

Purchasers also reported that domestic producers have not reached out to them with sales offers. \*\*\* reported that Insteel had never offered it a sale, and WMC offered a sale in 2020 at a “much higher price” than Sumiden. In addition, \*\*\* noted that it thought that WMC’s sales offer was to show it had attempted a sale prior to filing the petition in these investigations. \*\*\* reported that “no domestic mills ever reached out to do business” with it until 2017 when Sumiden opened its Texas mill. It added that it was unhappy with \*\*\*. \*\*\* noted that it had a relationship with two importers for \*\*\* and valued loyalty in its relationships. In addition, \*\*\* reported that it cannot rely solely on its domestic supplier for all of its supply.

Petitioners also provided what they considered evidence of lost sales and lost revenues, citing \*\*\* between customers and U.S. producers

Sumiden, Insteel, and WMC.<sup>22</sup> Italian and Taiwanese respondents argued that \*\*\* of the lost sales and lost revenue responses identify price as the reason for why purchasers bought PC strand from subject countries instead of domestic product. According to Italian and Taiwanese respondents, the \*\*\* firms<sup>23</sup> reporting purchasing subject imports instead of domestic product show \*\*\* in purchases of both domestic product and product from subject countries.<sup>24</sup>

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<sup>22</sup> Petitioners provided \*\*\* with purchasers \*\*\*, whose responses are reported in the table above, and \*\*\*, which did not respond to the lost sales and lost revenue survey. In addition, petitioners provided \*\*\* with \*\*\*; these firms were not listed in the lost sales and lost revenue allegations in the petition. Petitioners' postconference brief, pp. 25-27 and Exhibits 2-4.

<sup>23</sup> Purchasers \*\*\* submitted late lost sales and lost revenue surveys. Their responses were unavailable prior to the postconference brief submissions.

<sup>24</sup> Italian and Taiwanese respondents' postconference brief, pp. 31-33.





# Part VI: Financial experience of U.S. producers

## Background

Five U.S. producers (Bekaert, Insteel, Liberty, Sumiden, and WMC) provided usable financial data. All five responding U.S. producers reported financial results on a calendar year basis.<sup>1</sup> Four of the responding U.S. producers provided their financial data on the basis of generally accepted accounting principles (GAAP), with one U.S. producer (\*\*\*) reporting its financial results on the basis of International Financial Reporting Standards (IFRS). The questionnaire responses are believed to account for all known sales of PC strand by U.S. producers.<sup>2 3</sup>

Figure VI-1 presents each producer's share of the total reported net sales quantity in 2019. Revenue reflects commercial sales only (no internal consumption or transfers to related firms were reported from 2017 to 2019).

**Figure VI-1**  
**PC strand: Share of net sales quantity, by firm, 2019**

\* \* \* \* \*

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<sup>1</sup> Three U.S. producers reported fiscal years ending on December 31<sup>st</sup> while \*\*\*.

<sup>2</sup> Sumiden added a third PC strand operation in Dayton, Texas (\*\*\*). Production of PC strand at Dayton, Texas \*\*\*. \*\*\*'s U.S. producer questionnaire, II-2 and Sumiden webpage, <http://www.sumidenwire.com/about/>, retrieved May 13, 2020.

<sup>3</sup> In December 2018, Liberty acquired a PC strand facility located in Summerville, South Carolina, from Strand Tech Manufacturing, Inc. (wholly owned subsidiary of Keystone Consolidated Industries). Liberty reported financial data for the Summerville, South Carolina PC strand facility when it was under Keystone's ownership in 2017 and 2018. \*\*\*. In March 2020, Liberty sold its sole PC strand facility to Insteel Wire Products (wholly owned subsidiary of Insteel Industries, Inc.) for \$22.5 million. Insteel is in the process of closing the Summerville, South Carolina facility and moving the PC strand production equipment to its other facilities. \*\*\*'s U.S. producer questionnaires, II-2; GFG Alliance's Liberty Steel USA Furthers Expansion With Purchase Of Keystone Consolidated Industries, <https://www.prnewswire.com/news-releases/gfg-alliances-liberty-steel-usa-furthers-expansion-with-purchase-of-keystone-consolidated-industries-300758925.html>, retrieved May 13, 2020; Insteel Industries Acquires Assets of Strand-Tech Manufacturing, <https://www.industrialheating.com/articles/95571-insteel-industries-acquires-assets-of-strand-tech-manufacturing>, retrieved May 13, 2020; Testimony of Woltz, pp. 1 and 5; and, \*\*\*, email to USITC staff, May 19, 2020.

## Operations on PC strand

Table VI-1 presents aggregated data on U.S. producers' operations in relation to PC strand from 2017 to 2019, while table VI-2 presents corresponding changes in average unit values. Table VI-3 presents selected company-specific financial data. U.S. producers' reported mostly positive financial results in 2017 and 2018, but negative results in 2019.<sup>4</sup>

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<sup>4</sup> U.S. producers testified that the Section 232 tariffs imposed on imports of wire rod (the primary raw material used in the production of PC strand) in 2018 increased their costs to produce PC strand. In addition, the coronavirus pandemic will likely slow down the demand and prices for PC strand. Testimony of Woltz, p. 5.

**Table VI-1**  
**PC strand: Results of operations of U.S. producers, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
Total net sales	673,152	705,013	645,796
	<b>Value (1,000 dollars)</b>		
Total net sales	297,177	364,160	323,996
Cost of goods sold.--			
Raw materials	195,701	258,739	236,645
Direct labor	17,583	19,163	17,544
Other factory costs	48,774	49,866	60,741
Total COGS	262,058	327,768	314,930
Gross profit	35,119	36,392	9,066
SG&A expense	19,021	21,125	17,521
Operating income or (loss)	16,098	15,267	(8,455)
All other expenses/(income), net	1,284	1,316	1,032
Net income or (loss)	14,814	13,951	(9,487)
Depreciation/amortization	8,940	10,036	11,442
Cash flow	23,754	23,987	1,955
	<b>Ratio to net sales (percent)</b>		
Cost of goods sold.--			
Raw materials	65.9	71.1	73.0
Direct labor	5.9	5.3	5.4
Other factory costs	16.4	13.7	18.7
Average COGS	88.2	90.0	97.2
Gross profit	11.8	10.0	2.8
SG&A expense	6.4	5.8	5.4
Operating income or (loss)	5.4	4.2	(2.6)
Net income or (loss)	5.0	3.8	(2.9)
	<b>Ratio to total COGS (percent)</b>		
Cost of goods sold.--			
Raw materials	74.7	78.9	75.1
Direct labor	6.7	5.8	5.6
Other factory costs	18.6	15.2	19.3
Average COGS	100.0	100.0	100.0

Table continued on next page.

**Table VI-1—Continued**  
**PC strand: Results of operations of U.S. producers, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
Total net sales	441	517	502
Cost of goods sold.--			
Raw materials	291	367	366
Direct labor	26	27	27
Other factory costs	72	71	94
Average COGS	389	465	488
Gross profit	52	52	14
SG&A expense	28	30	27
Operating income or (loss)	24	22	(13)
Net income or (loss)	22	20	(15)
	<b>Number of firms reporting</b>		
Operating losses	---	---	5
Net losses	---	---	5
Data	5	5	5

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

**Table VI-2**  
**PC strand: Changes in AUVs between calendar years**

Item	Between calendar years		
	2017-19	2017-18	2018-19
	<b>Change in AUVs (percent)</b>		
Total net sales	▲ 13.6	▲ 17.0	▼ (2.9)
Cost of goods sold.--			
Raw materials	▲ 26.0	▲ 26.2	▼ (0.2)
Direct labor	▲ 4.0	▲ 4.1	▼ (0.1)
Other factory costs	▲ 29.8	▼ (2.4)	▲ 33.0
Average COGS	▲ 25.3	▲ 19.4	▲ 4.9
	<b>Change in AUVs (dollars per 1,000 pounds)</b>		
Total net sales	▲ 60.23	▲ 75.06	▼ (14.83)
Cost of goods sold.--			
Raw materials	▲ 75.72	▲ 76.28	▼ (0.56)
Direct labor	▲ 1.05	▲ 1.06	▼ (0.01)
Other factory costs	▲ 21.60	▼ (1.73)	▲ 23.33
Average COGS	▲ 98.36	▲ 75.61	▲ 22.75
Gross profit	▼ (38.13)	▼ (0.55)	▼ (37.58)
SG&A expense	▼ (1.13)	▲ 1.71	▼ (2.83)
Operating income or (loss)	▼ (37.01)	▼ (2.26)	▼ (34.75)
Net income or (loss)	▼ (36.70)	▼ (2.22)	▼ (34.48)

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

**Table VI-3**  
**PC strand: Results of operations of U.S. producers, by firm, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Total net sales (1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	673,152	705,013	645,796
	<b>Total net sales (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	297,177	364,160	323,996
	<b>Cost of goods sold (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	262,058	327,768	314,930
	<b>Gross profit or (loss) (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	35,119	36,392	9,066

Table continued on next page.

Table VI-3—Continued

## PC strand: Results of operations of U.S. producers, by firm, 2017-19

Item	Calendar year		
	2017	2018	2019
	<b>SG&amp;A expenses (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	19,021	21,125	17,521
	<b>Operating income or (loss) (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	16,098	15,267	(8,455)
	<b>Net income or (loss) (1,000 dollars)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	14,814	13,951	(9,487)
	<b>COGS to net sales ratio (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	88.2	90.0	97.2

Table continued on next page.

Table VI-3—Continued

## PC strand: Results of operations of U.S. producers, by firm, 2017-19

Item	Calendar year		
	2017	2018	2019
	<b>Gross profit or (loss) to net sales ratio (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	11.8	10.0	2.8
	<b>SG&amp;A expense to net sales ratio (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	6.4	5.8	5.4
	<b>Operating income or (loss) to net sales ratio (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	5.4	4.2	(2.6)
	<b>Net income or (loss) to net sales ratio (percent)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	5.0	3.8	(2.9)

Table continued on next page.

Table VI-3—Continued

## PC strand: Results of operations of U.S. producers, by firm, 2017-19

Item	Calendar year		
	2017	2018	2019
	<b>Unit net sales value (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	441	517	502
	<b>Unit raw materials (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	291	367	366
	<b>Unit direct labor (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	26	27	27
	<b>Unit other factory costs (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	72	71	94
	<b>Unit COGS (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	389	465	488

Table continued on next page.



Table VI-3—Continued

## PC strand: Results of operations of U.S. producers, by firm, 2017-19

Item	Calendar year		
	2017	2018	2019
	<b>Unit gross profit or (loss) (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	52.17	51.62	14.04
	<b>Unit SG&amp;A expenses (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	28.26	29.96	27.13
	<b>Unit operating income or (loss) (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	23.91	21.65	(13.09)
	<b>Unit net income or (loss) (dollars per 1,000 pounds)</b>		
Bekaert	***	***	***
Insteel	***	***	***
Liberty	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	22.01	19.79	(14.69)

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

## Net sales

Total net sales reflect only commercial sales, with quantities and values changing in the same direction, increasing from 2017 to 2018 but decreasing from 2018 to 2019 (table VI-1). Net sales quantities declined by 4.1 percent while net sales value increased by 9.0 percent from 2017 to 2019 (tables VI-1 and C-1). U.S. shipments represent virtually all commercial sales, with

exports accounting for one percent or less of commercial sales quantity and value from 2017 to 2019.<sup>5</sup>

Three U.S. producers (\*\*\*) reported positive net sales quantity and value growth from 2017 to 2018 and four U.S. producers reported declines from 2018 to 2019. All five U.S. producers reported positive net sales value growth from 2017 to 2018 and four U.S. producers reported declines from 2018 to 2019.<sup>6</sup> \*\*\* net sales quantity and value growth from 2018 to 2019.<sup>7</sup>

Average unit values of PC strand were \$441 per-1,000 pounds in 2017 (the lowest per unit value), increased to \$517 per-1,000 pounds in 2018, and then declined to \$502 per-1,000 pounds in 2019; average unit values increased by 13.6 percent from 2017 to 2019 (tables VI-1 and C-1). On a company-specific basis, all responding U.S. producers reported increases in average unit values of PC strand from 2017 to 2019 (table VI-3). The largest U.S. producer (\*\*\*) reported average unit sales values below the industry average in all three years while the smallest U.S. producer \*\*\* reported the highest per unit sales values during this period (table VI-3).<sup>8</sup>

### **Cost of goods sold and gross profit or (loss)**

Total cost of goods sold (“COGS”) increased from 2017 to 2018, but declined from 2018 to 2019, resulting in an increase of 20.2 percent from 2017 to 2019 (tables VI-1 and C-1). Average unit COGS increased by 25.3 percent from 2017 to 2019 (table VI-2). As a ratio to net sales, COGS consistently increased from 88.2 percent to 97.2 percent from 2017 to 2019 (table VI-1), attributable to the fluctuations in net sales value, raw materials, and other factory costs over this period.

Raw material costs (wire rod) represent the largest share of total COGS, ranging from 74.7 percent to 78.9 percent from 2017 to 2019 (table VI-1). Raw material costs fluctuated in both absolute and average per unit values, with the lowest costs reported in 2017 followed by

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<sup>5</sup> Exports were reported by \*\*\*. See table III-7 for additional details.

<sup>6</sup> Sumiden testified that it maintained sales at the expense of revenue and profitability. Testimony of Cornelius, p. 3.

<sup>7</sup> \*\*\*. WMC testified that post-tension customers are “particularly price-sensitive” and buy in large volumes and accounted for most of the PC strand consumption in the United States. WMC stated that it cannot “remain in {the PC strand} business based on sales to pre-tension customers alone.” \*\*\*’s U.S. producer questionnaire, II-9 and Testimony of Barrenechea, p. 3.

<sup>8</sup> \*\*\* mostly produced out-of-scope products for the energy and agricultural sectors using the same equipment, with PC strand accounting for \*\*\* percent of its total sales in 2019. \*\*\*. \*\*\*’s U.S. producer questionnaire, II-3a and III-5 and \*\*\*, email to USITC staff, May 18, 2020.

an increase in 2018 before decreasing in 2019 (table VI-1), mostly reflecting price increases of wire rod (the primary raw material) as a result of Section 232 tariffs.<sup>9</sup> Average raw material costs were \$291 per-1,000 pounds in 2017, \$367 per-1,000 pounds in 2018, and \$366 per-1,000 pounds in 2019 (table VI-1). As a ratio to net sales, raw materials increased from 65.9 percent to 73.0 percent from 2017 to 2019 (table VI-1). Table VI-4 presents raw materials, by type.<sup>10</sup> Wire rod is virtually the only raw material used to produce PC strand.

**Table VI-4**  
**PC strand: Raw materials by type, 2017-19**

Raw materials	Calendar 2019			Acquisition method	
	Value (1,000 dollars)	Unit value (dollars per 1,000 pounds)	Share of value (percent)	Make	Purchase
Wire rod	236,348	366	99.9	---	5
Other material inputs	297	0	0.1	---	3
Total, raw materials	236,645	366	100.0		

Note: \*\*\*.

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

The directional trend of company-specific average raw material costs tracked closely for the two largest producers (\*\*\*) and varied among the three smallest producers (\*\*\*).<sup>11</sup> \*\*\*'s average raw materials costs largely reflect the same pattern as their average net sales values (table VI-3).<sup>12</sup> \*\*\*.<sup>13</sup>

Other factory costs represent the second largest share of total COGS, ranging from 15.2 percent to 19.3 percent from 2017 to 2019 (table VI-1). Other factory costs increased by 24.5 percent in absolute values from 2017 to 2019 (calculated from table VI-1), attributable to periodic idling and reductions in shift detailed in table III-4. Average other factory costs per unit

<sup>9</sup> Petitioners explained that the increase in unit raw material costs \*\*\* “generally reflects the imposition of the section 232 tariffs and antidumping or countervailing duty orders on imported carbon wire rod.” Petitioners’ response to Commission questions, May 12, 2020, p. 13.

<sup>10</sup> Two producers \*\*\* reported purchasing wire rod at fair market value from related entities in 2019.

<sup>11</sup> \*\*\*. \*\*\*'s U.S. producer questionnaire, II-3a and III-5 and \*\*\*, email to USITC staff, May 18, 2020.

<sup>12</sup> Petitioners explained that per unit raw material costs \*\*\* from 2017 to 2018 and “remained fairly stable from 2018 to 2019 (\*\*\*)” with unit raw material cost variations of \$0.02 per pound or less in each year. Petitioners stated that “there are minimal differences in raw material cost based on product mix, as well as little variance in product mix for PC strand. The 250 and 270 ksi PC strand \*\*\*”.

Petitioners’ response to Commission questions, May 12, 2020, pp. 7-8 and exh. 6.

<sup>13</sup> Petitioners’ response to Commission questions, May 12, 2020, p. 7.

increased by 29.8 percent from 2017 to 2019 (calculated from table VI-1). Company-specific average per unit other factory costs varied widely, with \*\*\* reporting the highest average other factory costs per unit among responding U.S. producers. As a ratio to net sales, other factory costs were the lowest in 2018 when production and sales volumes were the highest (table VI-1).

Direct labor represents the smallest shares of total COGS, ranging from 5.6 percent to 6.7 percent from 2017 to 2019 (table VI-1). In absolute values, direct labor costs decreased less than 0.2 percent from 2017 to 2019, with direct labor cost at its the highest in 2018 when production and net sales were also highest (table VI-1). Average per unit direct labor cost remained stable at \$26 per-1,000 pounds in 2017 and \$27 per-1,000 pounds in 2018 and 2019 (table VI-1).

As presented in tables VI-1 and C-1, U.S. producers' gross profit declined by 74.2 percent, from \$35.1 million in 2017 to \$9.1 million in 2019 despite an increase in gross profit to \$36.4 million from 2017 to 2018. The gross profit increase in 2018 was attributable to the increases in net sales quantity and value from 2017 to 2018. Gross margins declined from 11.8 percent in 2017 to 10.0 percent in 2018 before declining further to 2.8 percent in 2019. The overall decline in gross profits tracked closely with declines in net sales and increases in raw material and other factory costs from 2017 to 2019.

### **SG&A expenses and operating income or (loss)**

U.S. producers' selling, general, and administrative ("SG&A") expense ratios (i.e., total SG&A expenses divided by net sales) declined from 6.4 percent in 2017 to 5.4 percent in 2019 (table VI-1). General and administrative expenses made up most of total SG&A costs, with selling expenses making up less than one-fourth of total SG&A costs.

As presented in tables VI-1 and C-1, U.S. producers' operating income decreased each year from \$16.1 million in 2017 to \$15.3 million in 2018, with an operating loss of \$8.5 million in 2019. Operating margins (i.e. operating income divided by net sales) also declined each year from 5.4 percent in 2017 to 4.2 percent in 2018, with a negative operating margin of 2.6 percent in 2019. On a company-specific basis, \*\*\* producers reported positive operating income in 2017 and 2018 and operating losses in 2019 (table VI-3).

## All other expenses and net income or (loss)

Classified below the operating income level are interest expenses, other expenses, and other income. In table VI-1, these items are aggregated with the net amount shown. The net “all other expenses” fluctuated from 2017 to 2019.<sup>14</sup> While the absolute difference between operating and net profits narrowed and widened in conjunction with changes in total interest expense and all other income and expenses, the U.S. industry’s operating and net profits followed the same directional trend throughout the period, with \*\*\* accounting for the largest share of net income in 2017 and 2018 and the largest shares of net losses in 2019.<sup>15</sup>

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<sup>14</sup> With the exception of \*\*\*, U.S. producers reported interest expenses, with \*\*\* accounting for the largest share of interest expenses from 2017 to 2018 (prior to Liberty’s acquisition of Strand Tech). Three producers (\*\*\*) reported all other expenses and income. \*\*\* reported non-recurring charges of \$\*\*\* classified all other expense in 2017 related to relocation of equipment.

<sup>15</sup> A variance analysis is not shown due to large differences in PC strand’s share of overall production among U.S. producers and resulting variations in the costs allocated to PC strand operations as well as the cost structures among the reporting firms.

## Capital expenditures and research and development expenses

Table VI-5 presents capital expenditures and research and development (“R&D”) expenses by firm. Aggregated capital expenditures decreased irregularly from 2017 to 2019, with the highest capital expenditures in 2017 resulting from \*\*\* and \*\*\*.<sup>16</sup> Most companies incurred capital expenditures related to equipment maintenance and plant improvements. R&D expenses were reported by one U.S. producer \*\*\* for costs related to its new plant while most U.S. producers reported no R&D expenses with respect to PC strand operations.<sup>17</sup>

**Table VI-5**  
**PC strand: Capital expenditures and R&D expenses of U.S. producers, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Capital expenditures (1,000 dollars)		
Bekaert	***	***	***
Liberty	***	***	***
Insteel	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	36,113	8,423	13,686
	R&D expenses (1,000 dollars)		
***	***	***	***
All firms	***	***	***

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

<sup>16</sup> Petitioners estimate that the cost to either add capacity or significantly increase PC strand capability at an existing PC strand facility is approximately \*\*\* and would take approximately \*\*\*.

Petitioners also estimated the amount of capital investment needed to start a greenfield PC strand plant to be approximately \*\*\* and \*\*\*. Petitioners’ response to Commission questions, May 12, 2020, pp. 8-9 and exh. 3.

<sup>17</sup> U.S. producers reported that R&D is not incurred at the plant level and that no R&D expenses is typical for PC strand operations.

## Assets and return on assets

Table VI-6 presents data on the U.S. producers' total assets and their return on assets ("ROA").<sup>18</sup> Total net assets fluctuated, from \$245.9 million in 2017 to \$251.4 million in 2018 and then to \$242.6 million in 2019. U.S. producers' ROA was mostly steady in 2017 and 2018 at 6.5 percent and 6.1 percent, respectively, but ROA declined to negative 3.5 percent in 2019. Although the specific ROA patterns varied among producers, \*\*\* responding companies reported positive ROA in 2017 and 2018 but negative ROA in 2019.

**Table VI-6**  
**PC strand: U.S. producers' total assets and return on assets, 2017-19**

Firm	Calendar years		
	2017	2018	2019
	<b>Total net assets (1,000 dollars)</b>		
Bekaert	***	***	***
Liberty	***	***	***
Insteel	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	245,912	251,394	242,568
	<b>Operating return on assets (percent)</b>		
Bekaert	***	***	***
Liberty	***	***	***
Insteel	***	***	***
Sumiden	***	***	***
WMC	***	***	***
All firms	6.5	6.1	(3.5)

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

<sup>18</sup> 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 in-scope product.

## Capital and investment

The Commission requested U.S. producers of PC strand to describe any actual or potential negative effects of imports of PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments. Table VI-7 presents the number of firms reporting an impact in each category and table VI-8 provides the U.S. producers' narrative responses.

**Table VI-7**  
**PC strand: Actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2017**

Item	No	Yes
Negative effects on investment	1	4
Cancellation, postponement, or rejection of expansion projects		3
Denial or rejection of investment proposal		2
Reduction in the size of capital investments		1
Return on specific investments negatively impacted		3
Other		2
Negative effects on growth and development	1	4
Rejection of bank loans		1
Lowering of credit rating		1
Problem related to the issue of stocks or bonds		1
Ability to service debt		2
Other		4
Anticipated negative effects of imports	1	4

Note: \*\*\*.

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



**Table VI-8**

**PC strand: Narratives relating to actual and anticipated negative effects of imports on investment, growth, and development, since January 1, 2017**

Item / Firm	Narrative
<b>Cancellation, postponement, or rejection of expansion projects:</b>	
***	***
***	***
<b>Denial or rejection of investment proposal:</b>	
***	***
<b>Return on specific investments negatively impacted:</b>	
***	***
***	***
<b>Other negative effects on investments:</b>	
***	***
***	***
<b>Ability to service debt:</b>	
***	***
<b>Other effects on growth and development:</b>	
***	***
***	***
***	***
***	***
<b>Anticipated effects of imports:</b>	
***	***
***	***
***	***

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 factors<sup>1</sup>--*

- (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,*

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<sup>1</sup> 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).<sup>2</sup>*

Information on the nature of the alleged 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.

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<sup>2</sup> 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 Argentina

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from Argentina.<sup>3</sup> The Commission received a usable questionnaire response from one firm: Acindar I.A.S.A. ("Acindar").<sup>4</sup> This firm's exports to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Argentina in 2019. According to estimates requested of the responding producer (Acindar), its production of PC strand in Argentina reported in its questionnaire response accounts for \*\*\* production of PC strand in Argentina in 2019.<sup>5</sup> Table VII- 1 presents information on the PC strand operations of Acindar.

**Table VII-1**  
**PC strand: Summary data for Acindar, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Acindar	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-2 Acindar's reported several operational and organizational changes since January 1, 2017.

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<sup>3</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>4</sup> Acindar is owned by Arcelormittal. <https://corporate.arcelormittal.com/locations>

<sup>5</sup> According to its website, Acindar produces approximately 3.9 million pounds of steel annually, and it has modern and large-scale production facilities in five cities within Argentina.

<https://www.acindar.com.ar/2019/06/14/acindar-grupo-arcelormittal-presento-su-primer-reporte-integrado/>.

**Table VII-2**

**PC strand: Acindar’s reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
<b>Prolonged shutdowns or curtailments:</b>	
***	***

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

**Operations on PC strand**

Table VII-3 presents information on the PC strand operations of Acindar during 2017-19, and projections for 2020 and 2021.

Acindar’s capacity \*\*\* from 2017 to 2019. The overall production fluctuated but increased by \*\*\* percent from 2017 to 2019 and capacity utilization also fluctuated but increased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased by \*\*\* percent during 2017-19, while internal consumption/transfers decreased by \*\*\* percent during 2017-19.<sup>6</sup> Commercial home market shipments increased from 2017 to 2018 by \*\*\* percent, but ultimately decreased by \*\*\* percent from 2017 to 2019.

Total shipments for Acindar increased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased from \*\*\* and increased by \*\*\* percent from 2018 to 2019. As a share of total shipments, exports to the United States increased \*\*\* percent from 2017 to 2019. Exports to all other markets as a share of total shipments fluctuated but increased by \*\*\* percentage points from 2017 to 2019. Other export markets identified by Acindar included \*\*\*.<sup>7 8</sup>

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<sup>6</sup> Projections indicate that capacity is expected to \*\*\*, but Acindar projects capacity to \*\*\* in 2021, while production during 2020 and 2021 is projected to \*\*\*.

<sup>7</sup> Acindar foreign producer questionnaire response, section II-8.

<sup>8</sup> The primary export markets outside the United States during 2019 for Acindar, which include percentages of exports to each country, are \*\*\*. Email Message from \*\*\* May 6, 2020.

**Table VII-3**  
**PC strand: Data for Acindar, 2017-19**

Item	Actual experience			Projections	
	Calendar year			Calendar year	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Acindar reported \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Argentina are Bolivia, Paraguay, and Uruguay (table VII-4). During 2019, the United States was the fourth largest export market for PC strand from Argentina, based on quantity, accounting for 13.2 percent,

preceded by Bolivia, Paraguay, and Uruguay accounting for 43.3 percent, 16.4 percent, and 14.6 percent, respectively. During 2019, the United States was the second largest export market for PC strand from Argentina, based on value, and had the highest average unit values.

**Table VII-4**  
**PC strand: Exports from Argentina, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	4,255	238	434
Bolivia	5,303	1,761	1,426
Paraguay	1,518	620	540
Uruguay	436	581	479
Chile	2,385	177	412
All other destination markets	6,007	838	---
Total exports	19,904	4,215	3,291
	<b>Value (1,000 dollars)</b>		
United States	6,757	392	547
Bolivia	2,719	1,021	682
Paraguay	1,075	567	318
Uruguay	556	659	484
Chile	827	143	191
All other destination markets	7,559	1,144	1
Total exports	19,493	3,926	2,223

Table continued on next page.



**Table VII-4--Continued**  
**PC strand: Exports from Argentina, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	1,588	1,647	1,260
Bolivia	513	580	478
Paraguay	708	915	589
Uruguay	1,275	1,134	1,010
Chile	347	808	464
All other destination markets	1,258	1,365	---
Total exports	979	931	675
	<b>Share of quantity (percent)</b>		
United States	21.4	5.6	13.2
Bolivia	26.6	41.8	43.3
Paraguay	7.6	14.7	16.4
Uruguay	2.2	13.8	14.6
Chile	12.0	4.2	12.5
All other destination markets	30.2	19.9	---
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by INDEC - National Institute of Statistics & Census in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Colombia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from Colombia; Emcocables and Knight S.A.S.<sup>9</sup> There were no responses to the Commission's questionnaire from producers/exporters of PC strand from Colombia.

ProColombia identifies the construction and metal industries as potential growth sectors in Colombia.<sup>10</sup> Procolombia cited a projection from Business Monitor that the Colombian construction industry would grow from \$30.1 billion in 2015 to \$52.1 billion in 2020.<sup>11</sup>

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<sup>9</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>10</sup> ProColombia is a Colombian government agency that promotes economic development by promoting Colombian exports and attracting foreign direct investment into Colombia.

<sup>11</sup> ProColombia, "Building Materials Investment in Colombia," Retrieved May 12, 2020. <https://investincolombia.com.co/sectors/manufacturing/building-materials.html>.

ProColombia estimated that consumption of metal products for structural use would increase in Colombia by 22.9 percent (from \$1.7 billion in 2013 to \$2 billion in 2018).<sup>12</sup>

## **Changes in operations**

No foreign producers reported any changes in operations.

## **Operations on PC strand**

Petitioners identified two possible producers of PC strand in Colombia, Emcocables and Knight SAS. Emcocables operates a manufacturing facility at Cajicá, Colombia.<sup>13</sup> No information was available regarding Knight SAS's production operations. Staff research was not able to identify other producers of steel wire strand in Colombia.

## **Alternative products**

Emcocables published multiple catalogs of steel wire strand products some of which can presumably be produced on the same machinery used to make PC strand.<sup>14</sup>

## **Exports**

According to GTA, the leading export markets for PC strand from Colombia are the United States and Ecuador (table VII-5). During 2019, the United States was the top export market for PC strand from Colombia, accounting for 50.3 percent, followed by the Ecuador, accounting for 30.6 percent.

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<sup>12</sup> ProColombia, "Metalworking Investment in Colombia," Retrieved May 12, 2020. <https://investincolombia.com.co/sectors/manufacturing/metalworking.html>.

<sup>13</sup> "Contact us." Emcocables, Retrieved May 12, 2020. <http://en.emcocables.co/contac-us/>.

<sup>14</sup> "Catalogs," Emcocables, Retrieved May 12, 2020. <http://en.emcocables.co/catalogs-emcocables/>; And "Products for prestressed concrete." Emcocables Retrieved May 12, 2020. <http://en.emcocables.co/prestressed-concrete/>.

**Table VII-5**  
**PC strand: Exports from Colombia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	2,554	1,833	1,800
Ecuador	1,275	1,698	1,095
Peru	392	335	378
Chile	371	194	93
Bolivia	558	219	56
Mexico	548	520	49
Aruba	---	---	37
Dominican Republic	---	153	37
Panama	512	26	17
All other destination markets	1,025	387	13
Total exports	7,235	5,365	3,575
	<b>Value (1,000 dollars)</b>		
United States	1,860	1,488	1,593
Ecuador	982	1,447	1,140
Peru	272	257	302
Chile	262	157	56
Bolivia	275	93	25
Mexico	429	409	49
Aruba	---	---	22
Dominican Republic	---	109	38
Panama	261	37	25
All other destination markets	578	279	28
Total exports	4,919	4,276	3,278

Table continued on next page.

**Table VII-5--Continued**  
**PC strand: Exports from Colombia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	728	812	885
Ecuador	770	852	1,041
Peru	694	767	799
Chile	706	809	602
Bolivia	493	425	446
Mexico	783	787	1,000
Aruba	---	---	595
Dominican Republic	---	712	1,027
Panama	510	1,423	1,471
All other destination markets	564	721	2,154
Total exports	680	797	917
	<b>Share of quantity (percent)</b>		
United States	35.3	34.2	50.3
Ecuador	17.6	31.6	30.6
Peru	5.4	6.2	10.6
Chile	5.1	3.6	2.6
Bolivia	7.7	4.1	1.6
Mexico	7.6	9.7	1.4
Aruba	---	---	1.0
Dominican Republic	---	2.9	1.0
Panama	7.1	0.5	0.5
All other destination markets	14.2	7.2	0.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Direccion de Impuestos y Aduanas Nacionales de Colombia (DIAN) in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Egypt

The Commission issued foreign producers' or exporters' questionnaires to three firms believed to produce and/or export PC strand from Egypt.<sup>15</sup> The Commission received a usable questionnaire response from one firm: United Wires Elsewedy Co. ("United Wires").<sup>16</sup> This firm's exports to the United States accounted for approximately \*\*\* U.S. imports of PC strand from Egypt in 2019. According to estimates requested of the responding producer (United Wires), its production of PC strand in Egypt reported in its questionnaire response accounts for \*\*\* percent of production of PC strand in Egypt in 2019. Table VII-6 presents information on the PC strand operations of United Wires.

**Table VII-6**  
**PC strand: Summary data for United Wires, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
United Wires	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

United Wires reported that \*\*\*.

## Operations on PC strand

Table VII-7 presents information on the PC strand operations of United Wires during 2017-19, and projections for 2020 and 2021. United Wires' capacity and production increased

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<sup>15</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>16</sup> United Wires Elsewedy is a subsidiary of Elsewedy Electric. According to its 2019 investor presentation, Elsewedy Electric has a total capacity of 364 million pounds to produce wires and cables in Egypt in its state-of-the-art facilities using advanced technology. *Elsewedy Electric Investor Presentation FY 2019*, p. 16. <http://ir.elsewedyelectric.com/>.

\*\*\*.<sup>17</sup> Home market shipments accounted for \*\*\* percent of United Wires' total shipments during 2019, and were projected to account for \*\*\* percent during 2020 and 2021.

Other export markets identified by United Wires include \*\*\*.<sup>18 19</sup>

**Table VII-7  
PC strand: Data for United Wires, 2017-19, and projections for 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

<sup>17</sup> Projections indicate that capacity and production are expected to \*\*\*, while United Wires projects exports to the United States to \*\*\*.

<sup>18</sup> United Wires foreign producer questionnaire response, section II-8.

<sup>19</sup> These are the primary export markets outside the United States \*\*\*.

## Alternative products

As shown in table VII-8, United Wires \*\*\*. United Wires' overall production and capacity increased by \*\*\* percent during 2017-19. United Wires' indicted that \*\*\*.

**Table VII-8**  
**PC strand: United Wires' overall capacity and production on the same equipment as subject production, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
Overall capacity	***	***	***
Production:			
PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	<b>Ratios and shares (percent)</b>		
Overall capacity utilization	***	***	***
Share of production:			
PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

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

## Exports

According to GTA, the leading export market for PC strand from Egypt is the United States (table VII-9). During 2019, the United States was the top export market for PC strand from Egypt, accounting for 99.6 percent.

**Table VII-9**  
**PC strand: Exports from Egypt, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	---	2	968
Morocco	1	---	3
United Kingdom	---	---	1
Jordan	---	172	---
Belgium	21	130	---
All other destination markets	949	326	---
Total exports	971	630	972
	<b>Value (1,000 dollars)</b>		
United States	---	33	348
Morocco	7	---	3
United Kingdom	---	---	2
Jordan	---	52	---
Belgium	23	322	---
All other destination markets	827	198	1
Total exports	857	605	354
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	---	16,500	360
Morocco	7,000	---	1,000
United Kingdom	---	---	2,000
Jordan	---	302	---
Belgium	1,095	2,477	---
All other destination markets	871	607	---
Total exports	883	960	364
	<b>Share of quantity (percent)</b>		
United States	---	0.3	99.6
Morocco	0.1	---	0.3
United Kingdom	---	---	0.1
Jordan	---	27.3	---
Belgium	2.2	20.6	---
All other destination markets	97.7	51.7	---
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official imports statistics of imports from Egypt (constructed export statistics for Egypt) under HS subheading 7312.10 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed May 11, 2020.



## The industry in Indonesia

The Commission issued foreign producers' or exporters' questionnaires to four firms believed to produce and/or export PC strand from Indonesia.<sup>20</sup> Usable responses to the Commission's questionnaire were received from two firms: PT Kingdom Indah ("Kingdom") and PT Sumiden Serasi Wire Products ("PT Sumiden").<sup>21</sup> These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Indonesia in 2019.<sup>22</sup> According to estimates requested of the responding producers in Indonesia, the production of PC strand in Indonesia reported in questionnaires accounts for approximately \*\*\* percent of overall production of PC strand in Indonesia in 2019.<sup>23</sup> Table VII-10 presents information on the PC strand operations of the responding producers and exporters in Indonesia.

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<sup>20</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>21</sup> The Commission received a foreign producer questionnaire from PT Bumi Steel Indonesia ("PT Bumi"). PT Bumi's questionnaire response was incomplete and was not included in the dataset. PT Bumi indicated that it \*\*\*. Staff did not receive a response to its follow-up inquiries.

<sup>22</sup> \*\*\*. \*\*\* foreign producer questionnaire responses, section II-8.

<sup>23</sup> \*\*\*.

**Table VII-10**  
**PC strand: Summary data for producers in Indonesia, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Kingdom	***	***	***	***	***	***
PT Sumiden	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-11, producers in Indonesia reported operational and organizational changes since January 1, 2017.

**Table VII-11**  
**PC strand: Indonesia producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
<b>Expansions:</b>	
***	***

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

## Operations on PC strand

Table VII-12 presents information on the PC strand operations of the responding producers and exporters in Indonesia. During 2017-19, capacity increased by \*\*\* percent, while production of PC strand during the same period fluctuated and increased by \*\*\* percent. The capacity utilization of Indonesian producers also fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased by \*\*\* percent during 2017-19.<sup>24</sup> Commercial home market shipments fluctuated and increased from 2017 to 2019 by \*\*\* percent.

Total shipments for the two Indonesian producers increased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased from \*\*\* and increased by \*\*\* percent from 2018 to 2019. As a share of total shipments, exports to the United States

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<sup>24</sup> Projections indicate that capacity is expected to \*\*\*, while production during 2020 and 2021 is projected to \*\*\*.

increased \*\*\* percentage points from 2017 to 2019. Exports to all other markets as a share of total decreased and \*\*\* percent from 2017 to 2019. Other export markets identified by the two Indonesian producers included \*\*\*.<sup>25</sup>

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<sup>25</sup> \*\*\* foreign producer questionnaire response, section II-8.

Table VII-12

PC strand: Data for producers in Indonesia, 2017-19 and projections for 2020 and 2021

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

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

## Alternative products

The two responding Indonesian firms indicated \*\*\*.<sup>26</sup>

<sup>26</sup> \*\*\*. \*\*\* foreign producer questionnaire response, section II-3a.

## Exports

According to GTA, the leading export markets for PC strand from Indonesia are Thailand and the United States (table VII-13). During 2019, the United States was the second largest export market for PC strand from Indonesia, accounting for 27.3 percent, preceded by Thailand, accounting for 28.1 percent.

**Table VII-13**  
**PC strand: Exports from Indonesia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	16,153	32,543	41,360
Thailand	38,404	49,351	42,522
Japan	9,588	12,054	23,612
Malaysia	11,772	9,161	9,081
India	8,895	8,883	8,183
Mexico	2,461	9,370	7,733
Vietnam	16,811	12,960	7,504
Philippines	2,862	4,104	4,835
South Africa	---	65	2,790
All other destination markets	3,026	1,793	3,855
Total exports	109,972	140,284	151,475
	<b>Value (1,000 dollars)</b>		
United States	12,783	21,458	24,800
Thailand	29,574	37,261	32,339
Japan	7,312	10,546	20,514
Malaysia	9,276	7,155	7,250
India	8,373	8,711	6,492
Mexico	1,811	6,745	4,772
Vietnam	12,538	10,176	5,897
Philippines	2,214	2,862	3,372
South Africa	---	44	1,807
All other destination markets	7,048	3,245	2,339
Total exports	90,929	108,203	109,582

Table continued on next page.

**Table VII-13--Continued**  
**PC strand: Exports from Indonesia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	791	659	600
Thailand	770	755	761
Japan	763	875	869
Malaysia	788	781	798
India	941	981	793
Mexico	736	720	617
Vietnam	746	785	786
Philippines	774	697	697
South Africa	---	677	648
All other destination markets	2,329	1,810	607
Total exports	827	771	723
	<b>Share of quantity (percent)</b>		
United States	14.7	23.2	27.3
Thailand	34.9	35.2	28.1
Japan	8.7	8.6	15.6
Malaysia	10.7	6.5	6.0
India	8.1	6.3	5.4
Mexico	2.2	6.7	5.1
Vietnam	15.3	9.2	5.0
Philippines	2.6	2.9	3.2
South Africa	---	0.0	1.8
All other destination markets	2.8	1.3	2.5
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Statistics Indonesia in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Italy

The Commission issued foreign producers' or exporters' questionnaires to six firms believed to produce and/or export PC strand from Italy.<sup>27</sup> Usable responses to the Commission's questionnaire were received from two firms: WBO Italcables Societa' Cooperativa ("WBO Italcables")<sup>28</sup> and CB Trafilati Acciai SPA ("Trafilati").<sup>29</sup> These firms' exports

<sup>27</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>28</sup> According to its website, WBO Italcables has an annual production capacity of 120 million pounds. [http://www.wboitalcables.it/index.php?option=com\\_sppagebuilder&view=page&id=2&Itemid=108](http://www.wboitalcables.it/index.php?option=com_sppagebuilder&view=page&id=2&Itemid=108).

to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Italy in 2019. According to estimates requested of the responding producers in Italy, the production of PC strand in Italy reported in questionnaires accounts for approximately \*\*\* percent of overall production of PC strand in Italy in 2019. Table VII-14 presents information on the PC strand operations of the responding producers and exporters in Italy.

**Table VII-14**  
**PC strand: Summary data for producers in Italy, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Trafilati	***	***	***	***	***	***
WBO Italcables	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-15 producers in Italy reported operational and organizational changes since January 1, 2017.

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(...continued)

<sup>29</sup> The Commission received correspondence from Italian PC strand producer Siderurgica Latina Martin S.p.A. Siderurgica Latina Martin S.p.A. did not complete a foreign producer questionnaire, but it had indicated that \*\*\*. Email correspondence with \*\*\* Siderurgica Latina Martin S.p.A. April 24, 2020.

**Table VII-15**

**PC strand: Italy producers' reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
<b>Relocations:</b>	
***	***

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

**Operations on PC strand**

Table VII-16 presents information on the PC strand operations of the responding producers and exporters in Italy. The Italian producers' capacity increased by \*\*\* percent from 2017 to 2019. The overall production decreased by \*\*\* percent from 2017 to 2019 and capacity utilization decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased by \*\*\* percent during 2017-19, while internal consumption/transfers \*\*\* during 2017-19.<sup>30</sup> Commercial home market shipments increased from 2017 to 2019 by \*\*\* percent.

Total shipments for Italy's producers decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States increased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments decreased by \*\*\* percentage points from 2017 to 2019, while total exports as a share of total shipments decreased by \*\*\* percentage points. Other export markets identified by \*\*\* included \*\*\*.<sup>31 32</sup>

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<sup>30</sup> Projections indicate that capacity and production are expected to \*\*\*, while end-of-period inventories are \*\*\*.

<sup>31</sup> \*\*\* foreign producer questionnaire responses, section II-8.

<sup>32</sup> \*\*\* both indicated the primary export markets outside the United States during 2019 for PC strand were \*\*\*, \*\*\*. Email Messages from \*\*\* May 5, 2020.



**Table VII-16**

**PC strand: Data for producers in Italy, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

The two responding Italian firms indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Italy are the United States and Poland (table VII-17). During 2019, the United States was the top export market for PC strand from Italy, accounting for 14.0 percent, followed by Poland, accounting for 11.5 percent.

**Table VII-17**  
**PC strand: Exports from Italy, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	25,984	22,834	30,988
Poland	25,504	27,344	25,579
Spain	27,924	26,901	23,216
France	18,572	26,239	22,572
Belgium	19,712	19,218	13,208
Germany	38,804	28,056	12,718
Serbia	6,342	7,558	8,766
Netherlands	11,655	9,668	8,353
Austria	6,995	9,132	7,975
All other destination markets	106,079	90,225	68,578
Total exports	287,571	267,175	221,953
	<b>Value (1,000 dollars)</b>		
United States	14,323	16,896	18,799
Poland	22,000	27,168	24,946
Spain	28,608	30,004	24,128
France	12,717	19,981	15,501
Belgium	8,369	10,657	6,858
Germany	25,736	19,478	9,127
Serbia	2,542	3,894	3,822
Netherlands	6,186	7,713	4,372
Austria	3,429	6,538	7,444
All other destination markets	103,173	108,956	81,286
Total exports	227,083	251,285	196,283

Table continued on next page.

**Table VII-17--Continued**  
**PC strand: Exports from Italy, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	551	740	607
Poland	863	994	975
Spain	1,024	1,115	1,039
France	685	762	687
Belgium	425	555	519
Germany	663	694	718
Serbia	401	515	436
Netherlands	531	798	523
Austria	490	716	933
All other destination markets	973	1,208	1,185
Total exports	790	941	884
	<b>Share of quantity (percent)</b>		
United States	9.0	8.5	14.0
Poland	8.9	10.2	11.5
Spain	9.7	10.1	10.5
France	6.5	9.8	10.2
Belgium	6.9	7.2	6.0
Germany	13.5	10.5	5.7
Serbia	2.2	2.8	3.9
Netherlands	4.1	3.6	3.8
Austria	2.4	3.4	3.6
All other destination markets	36.9	33.8	30.9
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Eurostat in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Malaysia

The Commission issued foreign producers' or exporters' questionnaires to three firms believed to produce and/or export PC strand from Malaysia.<sup>33</sup> Usable responses to the Commission's questionnaire were received from two firms: Wei Dat Steel Wire SDN BHD ("Wei Dat") and Kiswire SDN BHD ("Kiswire"). These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Malaysia in 2019. According to

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<sup>33</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

estimates requested of the responding producers in Malaysia, the production of PC strand in Malaysia reported in questionnaires accounts for approximately \*\*\* percent of overall production of PC strand in Malaysia in 2019. Table VII- 18 presents information on the PC strand operations of the responding producers and exporters in Malaysia.

**Table VII-18**  
**PC strand: Summary data for producers in Malaysia, 2017-19**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Kiswire	***	***	***	***	***	***
Wei Dat	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-19 producers in Malaysia reported operational and organizational changes since January 1, 2017.

**Table VII-19**  
**PC strand: Malaysia producers' reported changes in operations, since January 1, 2017**

<b>Item / Firm</b>	<b>Reported changed in operations</b>
<b>Plant openings:</b>	
***	***
<b>Expansions:</b>	
***	***

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

## Operations on PC strand

Table VII-20 presents information on the PC strand operations of the responding producers and exporters in Malaysia during 2017-19 and projections for the calendar years 2020 and 2021. The Malaysian producers' capacity increased by \*\*\* percent from 2017 to 2019. \*\*\*. The overall production increased by \*\*\* percent from 2017 to 2019, while capacity utilization decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period

inventories \*\*\* during 2017-19.<sup>34</sup> Commercial home market shipments increased from 2017 to 2019 by \*\*\* percent.

Total shipments for Malaysia's producers increased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States decreased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments increased by \*\*\* percentage points from 2017 to 2019, while total exports as a share of total shipments increased by \*\*\* percentage points to \*\*\* percent. Other export markets identified by the Malaysian producers included \*\*\*.<sup>35 36</sup>

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<sup>34</sup> Projections indicate that capacity \*\*\* and production is expected to \*\*\*, while end-of-period inventories are \*\*\*.

<sup>35</sup> \*\*\* foreign producer questionnaire responses, section II-8.

<sup>36</sup> \*\*\* indicated the primary export markets outside the United States during 2019 for PC strand were \*\*\*. \*\*\*. Email Messages from \*\*\* May 13, 2020.

**Table VII-20**

**PC strand: Data for producers in Malaysia, 2017-19, projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

The two responding Malaysian firms indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Malaysia are the United States and Korea (table VII-21). During 2019, the United States was the top export market for PC strand from Malaysia, accounting for 33.2 percent, followed by Korea, accounting for 17.2 percent.

**Table VII-21**  
**PC strand: Exports from Malaysia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	86,501	83,726	89,926
Korea	4,295	5,259	46,593
Singapore	27,748	20,558	23,685
Thailand	17,424	20,820	15,051
Indonesia	10,586	15,762	13,010
Netherlands	6,179	5,151	9,127
New Zealand	5,225	6,291	8,323
Taiwan	4,916	3,502	5,539
Turkey	2,374	4,202	5,500
All other destination markets	83,389	59,033	54,251
Total exports	248,637	224,304	271,005
	<b>Value (1,000 dollars)</b>		
United States	33,212	39,713	43,800
Korea	3,628	4,058	23,269
Singapore	12,591	12,741	16,065
Thailand	11,582	13,690	11,950
Indonesia	6,031	9,474	8,669
Netherlands	4,683	4,330	7,259
New Zealand	1,705	2,268	2,967
Taiwan	1,896	1,653	2,174
Turkey	1,324	2,031	2,579
All other destination markets	52,810	42,644	38,805
Total exports	129,462	132,602	157,537

Table continued on next page.

**Table VII-21--Continued**  
**PC strand: Exports from Malaysia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	384	474	487
Korea	845	772	499
Singapore	454	620	678
Thailand	665	658	794
Indonesia	570	601	666
Netherlands	758	841	795
New Zealand	326	361	356
Taiwan	386	472	392
Turkey	558	483	469
All other destination markets	633	722	715
Total exports	521	591	581
	<b>Share of quantity (percent)</b>		
United States	34.8	37.3	33.2
Korea	1.7	2.3	17.2
Singapore	11.2	9.2	8.7
Thailand	7.0	9.3	5.6
Indonesia	4.3	7.0	4.8
Netherlands	2.5	2.3	3.4
New Zealand	2.1	2.8	3.1
Taiwan	2.0	1.6	2.0
Turkey	1.0	1.9	2.0
All other destination markets	33.5	26.3	20.0
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Department of Statistics Malaysia in the Global Trade Atlas database, accessed May 11, 2020.



## The industry in Netherlands

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from the Netherlands.<sup>37</sup> The Commission received a usable questionnaire response from one firm: Nedri Spanstaal BV ("Nedri").<sup>38</sup> This firm's exports to the United States accounted for approximately \*\*\* U.S. imports of PC strand from the Netherlands in 2019. According to estimates requested of the responding producer (Nedri), its production of PC strand in the Netherlands reported in its questionnaire response accounts for \*\*\* production of PC strand in the Netherlands in 2019. Table VII-22 presents information on the PC strand operations of Nedri.

**Table VII-22**  
**PC strand: Summary data for Nedri Spanstaal, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Nedri	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

Nedri \*\*\*.

## Operations on PC strand

Table VII-23 presents information on the PC strand operations of Nedri during 2017-19 and projections for calendar years 2020 and 2021.

Nedri's capacity \*\*\* from 2017 to 2019. The overall production decreased by \*\*\* percent from 2017 to 2019 and capacity utilization also decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories decreased by \*\*\* percent during

<sup>37</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>38</sup> Staff received additional information regarding the PC strand production of Nedri. \*\*\*, CEO of Nedri indicated \*\*\*. Email Correspondence with \*\*\* April 28, 2020.

2017-19, while home market shipments \*\*\* during 2017-19.<sup>39</sup> Commercial home market shipments decreased by \*\*\* percent from 2017 to 2019.

Total shipments for Nedri decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States fluctuated but increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated but increased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments and increased by \*\*\* percentage points from 2017 to 2019. Total exports as a share of total shipments increased by \*\*\* percentage points during 2017-19 Other export markets identified by Nedri included \*\*\*.<sup>40 41</sup>

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<sup>39</sup> Projections indicate that capacity is expected to \*\*\*, while production during 2020 and 2021 is projected to \*\*\*.

<sup>40</sup> Nedri foreign producer questionnaire response, section II-8.

<sup>41</sup> The primary export markets outside the United States during 2019 for Nedri, which include percentages of exports to each country are, \*\*\*. During 2019, Nedri's exports to other markets accounted for \*\*\* percent of its total shipments, while its exports to the United States accounted for \*\*\* percent of its total shipments. Email Message from \*\*\* April 28, 2020.

**Table VII-23**

**PC strand: Data for Nedri in Netherlands, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Nedri indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Netherlands are Germany and Luxembourg (table VII-24). During 2019, Germany was the top export market for PC strand from Netherlands, accounting for 54.6 percent, followed by Luxembourg, accounting for 8.8 percent, while the United States was one its smaller export markets accounting for 0.5 percent, based on quantity.

**Table VII-24**  
**PC strand: Exports from Netherlands, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	3,805	156	471
Germany	19,551	36,693	48,079
Luxembourg	2,021	14,637	7,766
United Kingdom	6,933	4,809	3,201
France	2,292	3,015	2,236
Belgium	2,896	2,718	2,185
Italy	2,689	1,947	1,710
Norway	1,205	2,078	1,468
Poland	3,102	1,668	1,205
All other destination markets	31,001	21,833	19,810
Total exports	75,495	89,554	88,131
	<b>Value (1,000 dollars)</b>		
United States	3,630	855	1,785
Germany	21,626	38,966	46,462
Luxembourg	1,630	11,381	5,011
United Kingdom	7,820	6,538	3,906
France	4,296	6,439	4,823
Belgium	4,357	4,814	3,418
Italy	2,967	2,694	2,218
Norway	1,768	6,173	2,298
Poland	3,463	2,828	2,039
All other destination markets	44,711	39,358	32,474
Total exports	96,268	120,046	104,434

Table continued on next page.

**Table VII-24--Continued**  
**PC strand: Exports from Netherlands, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	954	5,481	3,790
Germany	1,106	1,062	966
Luxembourg	807	778	645
United Kingdom	1,128	1,360	1,220
France	1,874	2,136	2,157
Belgium	1,504	1,771	1,564
Italy	1,103	1,384	1,297
Norway	1,467	2,971	1,565
Poland	1,116	1,695	1,692
All other destination markets	1,442	1,803	1,639
Total exports	1,275	1,340	1,185
	<b>Share of quantity (percent)</b>		
United States	5.0	0.2	0.5
Germany	25.9	41.0	54.6
Luxembourg	2.7	16.3	8.8
United Kingdom	9.2	5.4	3.6
France	3.0	3.4	2.5
Belgium	3.8	3.0	2.5
Italy	3.6	2.2	1.9
Norway	1.6	2.3	1.7
Poland	4.1	1.9	1.4
All other destination markets	41.1	24.4	22.5
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Eurostat in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Saudi Arabia

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from Saudi Arabia.<sup>42</sup> Usable responses to the Commission's questionnaire were received from two firms: Al-Faisal Steel Products Company ("Al-Faisal")<sup>43</sup> and National Metal Manufacturing & Casting Co. (Maadaniyah) ("National Metal")<sup>44</sup>. These firms' exports to the United States accounted for \*\*\* U.S. imports of PC strand from Saudi Arabia in 2019. According to estimates requested of the responding producers in Saudi Arabia, the production of PC strand in Saudi Arabia reported in questionnaires accounts for approximately \*\*\* percent of overall production of PC strand in Saudi Arabia in 2019. Table VII-25 presents information on the PC strand operations of the responding producers and exporters in Saudi Arabia.

**Table VII-25**  
**PC strand: Summary data for producers in Saudi Arabia, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Al-Faisal	***	***	***	***	***	***
National Metal	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

<sup>42</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>43</sup> According to its website, Al-Faisal is the largest private sector steel manufacturer in Saudi Arabia. It has many facilities throughout the country, and produces many products that include steel bars, billets, PC wire, PC strand, and other downstream premium steel products. Based on a company history timeline, as of 2006, Al-Faisal has an overall production capacity of at least 300 million pounds. <https://www.ispc.com.sa/Overview.aspx>.

<sup>44</sup> According to its website, National Metal is the first and largest manufacturer of PC strands in the Middle East region. It further indicated that it has 200 million pounds of annual production capacity at its Aslak plant. <http://www.maadaniyah.com/en/our-industries/wire-drawing> and <http://www.aslak.com.sa/plant/capabilities>.

## Changes in operations

The two responding Saudi producers reported \*\*\*.

## Operations on PC strand

Table VII-26 presents information on the PC strand operations of the responding producers and exporters in Saudi Arabia during 2017-19, and projections for 2020 and 2021. The Saudi producers' capacity \*\*\* from 2017 to 2019. The overall production fluctuated but decreased by \*\*\* percent from 2017 to 2019, while capacity utilization fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories \*\*\* during 2017-19.<sup>45</sup> Commercial home market shipments decreased from 2017 to 2019 by \*\*\* percent.

Total shipments for Saudi Arabia's producers fluctuated but decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States fluctuated but decreased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States decreased by \*\*\* percentage points from 2017 to 2019. Exports as a share of total shipments to all other markets decreased by \*\*\* percentage points from 2017 to 2019, while total exports as a share of total shipments decreased by \*\*\* percentage points to \*\*\* percent. \*\*\*. Other export markets that were identified by \*\*\* included \*\*\*.<sup>46 47</sup>

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<sup>45</sup> Projections indicate that capacity \*\*\* and production is expected to \*\*\*, while end-of-period inventories are \*\*\*.

<sup>46</sup> \*\*\* foreign producer questionnaire responses, section II-8.

<sup>47</sup> \*\*\* indicated the primary export markets outside the United States during 2019 for PC strand were \*\*\*. \*\*\*. Email Messages from \*\*\* May 7, 2020.

Table VII-26

PC strand: Data for producers in Saudi Arabia, 2017-19 and projections for 2020 and 2021

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

The two Saudi producers indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Saudi Arabia are the United States and Jordan, per available 2018 data (table VII-27). During 2018, the United States was the top export market for PC strand from Saudi Arabia, accounting for 52.1 percent, followed by Jordan, accounting for 11.6 percent.



**Table VII-27**  
**PC strand: Exports from Saudi Arabia, 2017-18**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	163	30,183	---
Jordan	1,855	6,710	---
Egypt	321	5,207	---
Yemen	1,316	4,700	---
Oman	10,202	4,591	---
United Arab Emirates	8,582	2,969	---
Pakistan	---	1,016	---
Kuwait	934	677	---
India	---	443	---
All other destination markets	5,234	1,453	---
Total exports	28,607	57,949	---
	<b>Value (1,000 dollars)</b>		
United States	214	11,369	---
Jordan	1,123	2,490	---
Egypt	168	2,175	---
Yemen	548	12,715	---
Oman	4,749	2,560	---
United Arab Emirates	7,270	2,658	---
Pakistan	---	381	---
Kuwait	1,415	691	---
India	---	199	---
All other destination markets	2,486	2,061	---
Total exports	17,973	37,299	---

Table continued on next page.

**Table VII-27--Continued**  
**PC strand: Exports from Saudi Arabia, 2017-18**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	1,313	377	---
Jordan	605	371	---
Egypt	523	418	---
Yemen	416	2,705	---
Oman	465	558	---
United Arab Emirates	847	895	---
Pakistan	---	375	---
Kuwait	1,515	1,021	---
India	---	449	---
All other destination markets	475	1,418	---
Total exports	628	644	---
	<b>Share of quantity (percent)</b>		
United States	0.6	52.1	---
Jordan	6.5	11.6	---
Egypt	1.1	9.0	---
Yemen	4.6	8.1	---
Oman	35.7	7.9	---
United Arab Emirates	30.0	5.1	---
Pakistan	---	1.8	---
Kuwait	3.3	1.2	---
India	---	0.8	---
All other destination markets	18.3	2.5	---
Total exports	100.0	100.0	---

Note.—2019 export data for Saudi Arabia were not available at the time of this report's publishing.

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2018 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by UN Comtrade in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in South Africa

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from South Africa.<sup>48</sup> The Commission received a usable questionnaire response from one firm: Scaw Metals Group - Haggie Wire & Strand

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<sup>48</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

Operations (“Scaw”).<sup>49</sup> This firm’s exports to the United States accounted for approximately \*\*\* U.S. imports of PC strand from South Africa in 2019. According to estimates requested of the responding producer (Scaw), its production of PC strand in South Africa reported in its questionnaire response accounts for \*\*\* production of PC strand in South Africa during 2019. Table VII-28 presents information on the PC strand operations of Scaw.

**Table VII-28**  
**PC strand: Summary data for Scaw, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Scaw	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

Scaw reported \*\*\*.

## Operations on PC strand

Table VII-29 presents information on the PC strand operations of the responding producers and exporters in South Africa during 2017-19 and projections for 2020 and 2021. Scaw’s capacity \*\*\* from 2017 to 2019. Its PC strand production decreased by \*\*\* percent from 2017 to 2019 and capacity utilization also decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories \*\*\* during 2017-19, while home market shipments decreased by \*\*\* percent during 2017-19.<sup>50</sup> Commercial home market shipments \*\*\* from 2017 to 2019.

Total shipments for Scaw decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States fluctuated and decreased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated but increased by \*\*\*

<sup>49</sup> According to its website, Scaw is the only PC strand producer in South Africa, and a significant portion of its production is exported worldwide. <http://www.scaw.co.za/Pages/Wire-rod-products.aspx>.

<sup>50</sup> Projections indicate that capacity is expected to \*\*\*, while production during 2020 and 2021 is projected to \*\*\*.

percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. Total exports as a share of total shipments remained the same at \*\*\* percent during 2017-19. Other export markets identified by Scaw included \*\*\*.<sup>51 52</sup>

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<sup>51</sup> Scaw foreign producer questionnaire response, section II-8.

<sup>52</sup> The primary export markets outside the United States during 2019 for Scaw, which include percentages of exports to each country are, \*\*\*. During 2019, Scaw's exports to the U.S. accounted for \*\*\* percent of its total exports. Email Message from \*\*\* May 11, 2020.

**Table VII-29**

**PC strand: Data for Scaw, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

As shown in table VII-30, Scaw produced other products on the same equipment and machinery used to produce PC strand. Scaw indicated that \*\*\*.<sup>53</sup>

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<sup>53</sup> Scaw indicated that “\*\*\*” Email correspondence with \*\*\* May 11, 2020.

**Table VII-30**  
**PC strand: Scaw's overall capacity and production on the same equipment as subject production, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
Overall capacity	***	***	***
Production: PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***
	<b>Ratios and shares (percent)</b>		
Overall capacity utilization	***	***	***
Share of production: PC strand	***	***	***
Out-of-scope production	***	***	***
Total production on same machinery	***	***	***

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

## Exports

According to GTA, the leading export markets for PC strand from South Africa are the United States and Australia (table VII-31). During 2019, the United States was the top export market for PC strand from South Africa, accounting for 46.8 percent, followed by Australia, accounting for 10.3 percent.

**Table VII-31**  
**PC strand: Exports from South Africa, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	27,290	18,622	22,320
Australia	5,589	4,652	4,904
Brazil	5,879	10,333	4,602
Zambia	2,124	3,249	3,426
Zimbabwe	1,648	1,885	2,587
Namibia	1,576	2,155	1,166
Singapore	30	540	1,162
Canada	670	1,510	862
Swaziland	739	849	757
All other destination markets	7,187	9,504	5,951
Total exports	52,732	53,299	47,737
	<b>Value (1,000 dollars)</b>		
United States	10,240	8,629	9,226
Australia	3,863	3,876	3,738
Brazil	2,009	4,204	1,754
Zambia	2,445	4,592	5,223
Zimbabwe	2,232	2,876	3,438
Namibia	1,560	2,195	1,413
Singapore	34	437	601
Canada	1,164	2,346	1,430
Swaziland	801	887	540
All other destination markets	7,623	13,264	6,928
Total exports	31,971	43,306	34,291

Table continued on next page.

**Table VII-31--Continued**  
**PC strand: Exports from South Africa, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	375	463	413
Australia	691	833	762
Brazil	342	407	381
Zambia	1,151	1,413	1,525
Zimbabwe	1,354	1,526	1,329
Namibia	990	1,019	1,212
Singapore	1,133	809	517
Canada	1,737	1,554	1,659
Swaziland	1,084	1,045	713
All other destination markets	1,061	1,396	1,164
Total exports	606	813	718
	<b>Share of quantity (percent)</b>		
United States	51.8	34.9	46.8
Australia	10.6	8.7	10.3
Brazil	11.1	19.4	9.6
Zambia	4.0	6.1	7.2
Zimbabwe	3.1	3.5	5.4
Namibia	3.0	4.0	2.4
Singapore	0.1	1.0	2.4
Canada	1.3	2.8	1.8
Swaziland	1.4	1.6	1.6
All other destination markets	13.6	17.8	12.5
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by South Africa Revenue Service in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Spain

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from Spain.<sup>54</sup> The Commission received a usable questionnaire response from one firm: Trenzas y Cables de Acero ("TYCSA"). This firm's exports to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Spain in 2019. According to estimates requested of the responding producer (TYCSA), its

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<sup>54</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.



production of PC strand in Spain reported in its questionnaire response accounts for \*\*\* production of PC strand in Spain during 2019. Table VII-32 presents information on the PC strand operations of TYCSA.

**Table VII-32**  
**PC strand: Summary data for TYCSA, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
TYCSA	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

TYCSA reported \*\*\*.

## Operations on PC strand

Table VII-33 presents information on the PC strand operations of TYCSA during 2017-19 and projections for calendar years 2020 and 2021. TYCSA's capacity increased by \*\*\* percent from 2017 to 2019. Its PC strand production increased by \*\*\* percent from 2017 to 2019 and capacity utilization also increased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased by \*\*\* percent during 2017-19.<sup>55</sup> Commercial home market shipments increased by \*\*\* percent from 2017 to 2019.

Total shipments for TYCSA increased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States fluctuated but increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated but increased by \*\*\* percentage points from 2017 to 2019. Exports as a share of total shipments to all other markets fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. Total exports as a share of total shipments \*\*\* percent during 2017-19. Other export markets identified by TYCSA included \*\*\*.<sup>56 57</sup>

<sup>55</sup> Projections indicate that capacity and production are expected to \*\*\*.

<sup>56</sup> TYCSA foreign producer questionnaire response, section II-8.

Table VII-33

PC strand: Data for TYCSA, 2017-19 and projections for calendar years 2020 and 2021

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

TYCSA indicated \*\*\*.

(...continued)

<sup>57</sup> The primary export markets outside the United States during 2019 for TYCSA, which include percentages of exports to each country, are \*\*\*. Email Message from \*\*\* May 12, 2020.

## Exports

According to GTA, the leading export markets for PC strand from Spain are Portugal, the United States, and France (table VII-34). During 2019, the United States was the second largest export market for PC strand from Spain, accounting for 13.1 percent, preceded by Portugal, accounting for 28.2 percent, and the U.S. was followed by France, accounting for 12.5 percent.

**Table VII-34**  
**PC strand: Exports from Spain, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	6,302	11,764	15,257
Portugal	21,180	23,894	32,818
France	14,933	13,671	14,580
Morocco	7,990	14,704	13,093
Italy	10,947	9,080	11,260
Germany	7,658	5,829	3,819
Luxembourg	12,469	7,026	2,780
Chile	232	1,031	2,753
Brazil	72	3,424	2,188
All other destination markets	18,505	20,566	17,690
Total exports	100,288	110,989	116,238
	<b>Value (1,000 dollars)</b>		
United States	6,304	14,794	18,422
Portugal	17,796	20,625	24,891
France	15,407	15,840	15,555
Morocco	5,823	9,802	7,991
Italy	9,824	8,677	11,615
Germany	6,710	5,864	3,669
Luxembourg	10,534	6,794	2,714
Chile	267	737	1,302
Brazil	569	1,611	818
All other destination markets	19,926	24,963	21,741
Total exports	93,160	109,707	108,718

Table continued on next page.

**Table VII-34--Continued**  
**PC strand: Exports from Spain, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	1,000	1,258	1,207
Portugal	840	863	758
France	1,032	1,159	1,067
Morocco	729	667	610
Italy	897	956	1,032
Germany	876	1,006	961
Luxembourg	845	967	976
Chile	1,151	715	473
Brazil	7,903	471	374
All other destination markets	1,077	1,214	1,229
Total exports	929	988	935
	<b>Share of quantity (percent)</b>		
United States	6.3	10.6	13.1
Portugal	21.1	21.5	28.2
France	14.9	12.3	12.5
Morocco	8.0	13.2	11.3
Italy	10.9	8.2	9.7
Germany	7.6	5.3	3.3
Luxembourg	12.4	6.3	2.4
Chile	0.2	0.9	2.4
Brazil	0.1	3.1	1.9
All other destination markets	18.5	18.5	15.2
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Eurostat in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Taiwan

The Commission issued foreign producers' or exporters' questionnaires to five firms believed to produce and/or export PC strand from Taiwan.<sup>58</sup> The Commission received a usable questionnaire response from one firm: Chia Ta World Co., Ltd. ("Chia").<sup>59</sup> This firm's exports to

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<sup>58</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>59</sup> In its conference witness statement, a company representative for Chia indicated that it has not increased capacity since 1996, and to its knowledge, it is the only PC strand mill in Taiwan. Chia Ta World Co., Ltd.'s witness statement, p. 1.

the United States accounted for \*\*\* U.S. imports of PC strand from Taiwan in 2019. According to estimates requested of the responding producer Chia, its production of PC strand in Taiwan reported in its questionnaire response accounts for \*\*\* percent of production of PC strand in Taiwan during 2019. Table VII-35 presents information on the PC strand operations of Chia.

**Table VII-35**  
**PC strand: Summary data for Chia, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Chia	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

Chia reported \*\*\*.

## Operations on PC strand

Table VII-36 presents information on the PC strand operations of Chia during 2017-19 and projections for calendar years 2020 and 2021. Chia's capacity \*\*\* from 2017 to 2019. Its PC strand production fluctuated but decreased by \*\*\* percent from 2017 to 2019 and capacity utilization also fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased \*\*\* during 2017-19, while home market shipments decreased by \*\*\* percent during 2017-19.<sup>60 61</sup> Commercial home market shipments \*\*\* from 2017 to 2019.

Total shipments for Chia fluctuated but decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States fluctuated but increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated and increased by \*\*\* percentage points from 2017 to 2019. There were \*\*\* exports to all other markets.

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<sup>60</sup> Chia's \*\*\*.

<sup>61</sup> Projections indicate that capacity \*\*\* and production is expected to \*\*\*. Chia's projections of exports to the United States of PC strand are projected to \*\*\*.

Table VII-36

PC strand: Data for Chia, 2017-19 and projections for calendar years 2020 and 2021

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Chia indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Taiwan are Japan, China, and the United States (table VII-37). During 2019, the United States was the third largest export market for PC strand from Taiwan, based on quantity, accounting for 5.1 percent, preceded by Japan, accounting for 51.9 percent and China, accounting for 16.0 percent.

**Table VII-37**  
**PC strand: Exports from Taiwan, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	771	611	685
Japan	6,006	6,405	6,947
China	2,841	1,245	2,134
Thailand	1,134	814	598
Vietnam	3,042	562	578
Myanmar	140	315	364
Pakistan	113	383	352
Korea South	138	381	307
Philippines	115	97	241
All other destination markets	1,494	1,179	1,168
Total exports	15,794	11,992	13,374
	<b>Value (1,000 dollars)</b>		
United States	1,713	1,807	2,106
Japan	5,749	6,630	7,423
China	3,269	1,386	2,085
Thailand	975	684	507
Vietnam	1,249	389	466
Myanmar	121	267	339
Pakistan	24	45	29
Korea South	205	594	425
Philippines	101	59	226
All other destination markets	2,484	2,438	2,796
Total exports	15,890	14,299	16,402

Table continued on next page.

**Table VII-37--Continued**  
**PC strand: Exports from Taiwan, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	2,222	2,957	3,074
Japan	957	1,035	1,069
China	1,151	1,113	977
Thailand	860	840	848
Vietnam	411	692	806
Myanmar	864	848	931
Pakistan	212	117	82
Korea South	1,486	1,559	1,384
Philippines	878	608	938
All other destination markets	1,663	2,068	2,394
Total exports	1,006	1,192	1,226
	<b>Share of quantity (percent)</b>		
United States	4.9	5.1	5.1
Japan	38.0	53.4	51.9
China	18.0	10.4	16.0
Thailand	7.2	6.8	4.5
Vietnam	19.3	4.7	4.3
Myanmar	0.9	2.6	2.7
Pakistan	0.7	3.2	2.6
Korea South	0.9	3.2	2.3
Philippines	0.7	0.8	1.8
All other destination markets	9.5	9.8	8.7
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by Taiwan Directorate General of Customs in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Tunisia

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from Tunisia.<sup>62</sup> The Commission received a usable questionnaire response from one firm: Maklada Industries ("Maklada").<sup>63</sup> This firm's exports to

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<sup>62</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>63</sup> According to its website, Maklada has three factories with state-of-the-art machines, and it was equipped in 2009 with a production line dedicated to PC strand. [http://www.maklada.com/Fr/a-propos-de-nous\\_11\\_4](http://www.maklada.com/Fr/a-propos-de-nous_11_4).



the United States accounted for \*\*\* U.S. imports of PC strand from Tunisia in 2019. According to estimates requested of the responding producer Tunisia, its production of PC strand in Tunisia reported in its questionnaire response accounts for \*\*\* production of PC strand in Tunisia during 2019. Table VII-38 presents information on the PC strand operations of Maklada.

**Table VII-38**  
**PC strand: Summary data for Maklada, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Maklada	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

Maklada reported \*\*\*.

## Operations on PC strand

Table VII-39 presents information on the PC strand operations of Maklada during 2017-19 and projections for calendar years 2020 and 2021. Maklada's capacity \*\*\* from 2017 to 2019. Its PC strand production decreased by \*\*\* percent from 2017 to 2019 and capacity utilization also fluctuated but decreased by \*\*\* percentage points from 2017 to 2019. In addition, end-of-period inventories increased \*\*\* during 2017-19.<sup>64</sup> Commercial home market shipments fluctuated but decreased by \*\*\* percent from 2017 to 2019.

Total shipments for Maklada decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States decreased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated and increased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets decreased as a share of total shipments by \*\*\* percentage points, while total exports as a share of total shipments decreased by \*\*\* percentage points but was \*\*\* percent of total shipments.

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<sup>64</sup> Projections indicate that capacity \*\*\* and production is expected to \*\*\*. Maklada's projections of exports to the United States of PC strand are projected to \*\*\*.

Table VII-39

## PC strand: Data for Maklada, 2017-19 and projections for calendar years 2020 and 2021

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Maklada indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Tunisia are the United States and Morocco (table VII-40). During 2019, the United States was the top export market for PC strand from Tunisia, accounting for 91.0 percent, followed by the Morocco, accounting for 5.1 percent.

**Table VII-40**  
**PC strand: Exports from Tunisia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	33,169	30,323	26,655
Morocco	3,955	4,185	1,487
Malta	---	168	678
Ireland	4,065	870	410
France	78	842	44
Italy	9	3	11
Norway	---	4	3
Japan	2	---	1
Belgium	7	7	---
All other destination markets	13,949	8,858	1
Total exports	55,234	45,260	29,290
	<b>Value (1,000 dollars)</b>		
United States	12,001	13,320	10,493
Morocco	2,265	2,722	794
Malta	---	74	290
Ireland	1,394	408	147
France	119	409	44
Italy	93	2	439
Norway	---	49	35
Japan	7	---	4
Belgium	44	53	---
All other destination markets	5,172	3,684	3
Total exports	21,095	20,721	12,249

Table continued on next page.

**Table VII-40--Continued**  
**PC strand: Exports from Tunisia, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	362	439	394
Morocco	573	650	534
Malta	---	440	428
Ireland	343	469	359
France	1,526	486	1,000
Italy	10,333	667	39,909
Norway	---	12,250	11,667
Japan	3,500	---	4,000
Belgium	6,286	7,571	---
All other destination markets	371	416	3,000
Total exports	382	458	418
	<b>Share of quantity (percent)</b>		
United States	60.1	67.0	91.0
Morocco	7.2	9.2	5.1
Malta	---	0.4	2.3
Ireland	7.4	1.9	1.4
France	0.1	1.9	0.2
Italy	0.0	0.0	0.0
Norway	---	0.0	0.0
Japan	0.0	---	0.0
Belgium	0.0	0.0	---
All other destination markets	25.3	19.6	0.0
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official imports statistics of imports from Tunisia (constructed export statistics for Tunisia) under HS subheading 7312.10 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Turkey

The Commission issued foreign producers' or exporters' questionnaires to three firms believed to produce and/or export PC strand from Turkey.<sup>65</sup> Usable responses to the Commission's questionnaire were received from two firms: Guney Celik Hasir Ve Demir MAM.

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<sup>65</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

SAN. TIC. A.S (“Güney Çelik”) <sup>66</sup> and Çelik Halat ve Tel Sanayii A.Ş. (“Çelik Halat”).<sup>67</sup> These firms’ exports to the United States accounted for approximately \*\*\* percent of U.S. imports of PC strand from Turkey in 2019. According to estimates requested of the responding producers in Turkey, the production of PC strand in Turkey reported in questionnaires accounts for approximately \*\*\* percent of overall production of PC strand in Turkey in 2019. Table VII-41 presents information on the PC strand operations of the responding producers and exporters in Turkey.

**Table VII-41**  
**PC strand: Summary data for producers in Turkey, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Celik Halat	***	***	***	***	***	***
Güney Çelik	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-42, producers in Turkey reported several operational and organizational changes since January 1, 2017.

**Table VII-42**  
**PC strand: Turkey producers' reported changes in operations, since January 1, 2017**

<b>Item / Firm</b>	<b>Reported changed in operations</b>
<b>Expansions:</b>	
***	***

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

<sup>66</sup> According to its website, Güney Çelik has five factories throughout Turkey that produce many steel products, including PC strand. Per its website, Güney Çelik has been adding capacity and new production facilities since it was established in 1993. <https://www.guneycelik.com.tr/kurumsal/hakkimizda>.

<sup>67</sup> According to its Q4 2018 investor presentation, Çelik Halat has an overall production capacity of approximately 155 million pounds annually. <http://www.celikhalat.com.tr/investor-relations-financial-results-and-presentations>.

## Operations on PC strand

Table VII-43 presents information on the PC strand operations of the responding producers in Turkey during 2017 and projections for calendar years 2020 and 2021. The Turkish producers' capacity increased by \*\*\* percent from 2017 to 2019. This increase in capacity coincided with \*\*\*. The overall production decreased by \*\*\* percent from 2017 to 2019, while capacity utilization decreased by \*\*\* percentage points from 2017 to 2019 to \*\*\* percent. In addition, end-of-period inventories \*\*\* during 2017-19.<sup>68</sup> Commercial home market shipments decreased from 2017 to 2019 by \*\*\* percent.

Total shipments for Turkey's producers decreased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States increased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments increased by \*\*\* percentage points from 2017 to 2019, while total exports as a share of total shipments increased by \*\*\* percentage points to \*\*\* percent. Other export markets identified by the Turkish producers included \*\*\*.<sup>69 70 71</sup>

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<sup>68</sup> Projections indicate that capacity \*\*\* and production is expected to \*\*\*, while end-of-period inventories are \*\*\*.

<sup>69</sup> \*\*\* foreign producer questionnaire responses, section II-8.

<sup>70</sup> \*\*\* indicated the primary export markets outside the United States during 2019 for PC strand were \*\*\*. Email Messages from \*\*\* May 5, 2020.

<sup>71</sup> \*\*\* indicated the primary export markets outside of the United States (\*\*\*) during 2019 for PC strand were \*\*\*. Email Message from \*\*\*, May 4, 2020.

**Table VII-43**

**PC strand: Data for producers in Turkey, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

The two Turkish producers indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from Turkey are the United States and Belgium (table VII-44). During 2019, the United States was the top export market for PC strand from Turkey, accounting for 26.4 percent, followed by the Belgium, accounting for 9.0 percent.

**Table VII-44**  
**PC strand: Exports from Turkey, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	35,402	41,115	60,980
Belgium	16,308	18,442	20,800
Egypt	11,349	13,487	14,984
Mexico	12,254	12,394	12,726
Denmark	4,066	9,263	10,947
Italy	8,461	8,558	9,377
Brazil	176	3,986	7,215
Netherlands	3,056	4,303	7,092
Germany	13,071	7,005	7,022
All other destination markets	50,555	63,705	79,533
Total exports	154,698	182,258	230,676
	<b>Value (1,000 dollars)</b>		
United States	12,206	19,469	26,905
Belgium	13,354	17,681	18,471
Egypt	14,733	16,575	15,267
Mexico	8,558	9,574	9,982
Denmark	2,389	6,185	7,494
Italy	6,583	7,981	7,509
Brazil	127	1,923	3,057
Netherlands	1,663	3,193	4,745
Germany	12,529	7,959	7,270
All other destination markets	38,634	53,592	55,144
Total exports	110,776	144,132	155,844

Table continued on next page.



**Table VII-44--Continued**  
**PC strand: Exports from Turkey, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	345	474	441
Belgium	819	959	888
Egypt	1,298	1,229	1,019
Mexico	698	772	784
Denmark	588	668	685
Italy	778	933	801
Brazil	722	482	424
Netherlands	544	742	669
Germany	959	1,136	1,035
All other destination markets	764	841	693
Total exports	716	791	676
	<b>Share of quantity (percent)</b>		
United States	22.9	22.6	26.4
Belgium	10.5	10.1	9.0
Egypt	7.3	7.4	6.5
Mexico	7.9	6.8	5.5
Denmark	2.6	5.1	4.7
Italy	5.5	4.7	4.1
Brazil	0.1	2.2	3.1
Netherlands	2.0	2.4	3.1
Germany	8.4	3.8	3.0
All other destination markets	32.7	35.0	34.5
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 731210 as reported by State Institute of Statistics in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in Ukraine

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from Ukraine.<sup>72</sup> The Commission received a usable questionnaire response from one firm: PJSC PA Stalkanat-Silur ("Stalkanat").<sup>73</sup> This firm's

<sup>72</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>73</sup> According to its website, Stalkanat had the capacity to produce approximately 48 million pounds of various steel products annually in the early 2000's. It has indicated that it has upgraded its facilities and  
*(continued...)*

exports to the United States accounted for approximately \*\*\* U.S. imports of PC strand from Ukraine in 2019. According to estimates requested of the responding producer (Stalkanat), its production of PC strand in Ukraine reported in its questionnaire response accounts for \*\*\* production of PC strand in Ukraine in 2019. Table VII-45 presents information on the PC strand operations of Stalkanat.

**Table VII-45**  
**PC strand: Summary data for Stalkanat, 2019**

<b>Firm</b>	<b>Production (1,000 pounds)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 pounds)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 pounds)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Stalkanat	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

### Changes in operations

As presented in table VII-46 Stalkanat reported several operational and organizational changes since January 1, 2017.

**Table VII-46**  
**PC strand: Stalkanat's reported changes in operations, since January 1, 2017**

<b>Item / Firm</b>	<b>Reported changed in operations</b>
<b>Plant closings:</b>	
***	***
<b>Expansions:</b>	
***	***
<b>Prolonged shutdowns or curtailments:</b>	
***	***

Note.—Stalkanat indicated that \*\*\*. Stalkanat foreign producer questionnaire response, section II-10.

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

(...continued)

has implemented state-of-the-art technology over the last ten years.

<https://stalkanatsilur.com.ua/en/history/>.

## Operations on PC strand

Table VII-47 presents information on the PC strand operations of Stalkanat during 2017-19 and projections for calendar years 2020 and 2021. Stalkanat's capacity increased by \*\*\* percent from 2017 to 2019. Its PC strand production fluctuated and increased by \*\*\* percent from 2017 to 2019 and capacity utilization also fluctuated but decreased by \*\*\* percentage points from 2017 to 2019 \*\*\*. In addition, end-of-period inventories \*\*\* during 2017-19,<sup>74</sup> while home market shipments increased by \*\*\* percent during 2017-19.<sup>75</sup> Commercial home market shipments \*\*\* from 2017 to 2019.

Total shipments for Stalkanat increased by \*\*\* percent from 2017 to 2019. Exports of PC strand to the United States increased by \*\*\* percent from 2017 to 2019. As a share of total shipments, exports to the United States fluctuated and increased by \*\*\* percentage points from 2017 to 2019. Exports to all other markets decreased as a share of

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<sup>74</sup> Stalkanat indicated that \*\*\*

Email message from \*\*\*, May 5, 2020.

\*\*\*.

<sup>75</sup> Projections indicate that capacity and production \*\*\*. Stalkanat's projections of exports to the United States of PC strand are projected to \*\*\*.

total shipments by \*\*\* percentage points, while total exports as a share of total shipments fluctuated and increased by \*\*\* percentage points.<sup>76</sup>

**Table VII-47**

**PC strand: Data for Stalkanat, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Stalkanat indicated \*\*\*.

<sup>76</sup> Stalkanat indicated the primary export markets outside of the United States (\*\*\*) during 2019 for PC strand were \*\*\*. Email Message from \*\*\*, May 5, 2020.

## Exports

According to GTA, the leading export markets for PC strand from Ukraine are the United States and Belarus (table VII-48). During 2019, the United States was the top export market for PC strand from Ukraine, accounting for 22.5 percent, followed by Belarus, accounting for 19.5 percent.

**Table VII-48**  
**PC strand: Exports from Ukraine, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	420	4,385	3,160
Belarus	3,063	3,120	2,742
Lithuania	450	3,515	1,573
Hungary	148	295	1,126
Georgia	688	413	895
Latvia	62	1,921	553
Suriname	---	52	468
Bulgaria	705	402	433
Czech Republic	232	500	405
All other destination markets	3,776	3,233	2,691
Total exports	9,544	17,836	14,046
	<b>Value (1,000 dollars)</b>		
United States	160	2,042	1,240
Belarus	1,601	1,930	2,140
Lithuania	181	1,560	615
Hungary	59	131	389
Georgia	357	256	441
Latvia	30	814	206
Suriname	---	21	182
Bulgaria	452	260	277
Czech Republic	156	411	318
All other destination markets	2,631	2,535	3,267
Total exports	5,627	9,960	9,075

Table continued on next page.

**Table VII-48--Continued**  
**PC strand: Exports from Ukraine, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	381	466	392
Belarus	523	619	780
Lithuania	402	444	391
Hungary	399	444	345
Georgia	519	620	493
Latvia	484	424	373
Suriname	---	404	389
Bulgaria	641	647	640
Czech Republic	672	822	785
All other destination markets	697	784	1,214
Total exports	590	558	646
	<b>Share of quantity (percent)</b>		
United States	4.4	24.6	22.5
Belarus	32.1	17.5	19.5
Lithuania	4.7	19.7	11.2
Hungary	1.6	1.7	8.0
Georgia	7.2	2.3	6.4
Latvia	0.6	10.8	3.9
Suriname	---	0.3	3.3
Bulgaria	7.4	2.3	3.1
Czech Republic	2.4	2.8	2.9
All other destination markets	39.6	18.1	19.2
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official exports statistics under HS subheading 7312.10 as reported by State Customs Committee of the Ukraine in the Global Trade Atlas database, accessed May 11, 2020.

## The industry in United Arab Emirates

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from UAE.<sup>77</sup> The Commission received a usable questionnaire response from one firm: Essen Steel Industry LLC ("Essen"). This firm \*\*\* to the United States and accounted for \*\*\* U.S. imports of PC strand from UAE in 2019. According to estimates requested of the responding producer (Essen), its production of PC strand in UAE

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<sup>77</sup> This firm was identified through a review of information submitted in the petition and contained in \*\*\* records.

reported in its questionnaire response accounts for \*\*\* percent of production of PC strand in UAE in 2019. Table VII-49 presents information on the PC strand operations of Essen.

**Table VII-49**  
**PC strand: Summary data for Essen, 2019**

Firm	Production (1,000 pounds)	Share of reported production (percent)	Exports to the United States (1,000 pounds)	Share of reported exports to the United States (percent)	Total shipments (1,000 pounds)	Share of firm's total shipments exported to the United States (percent)
Essen	***	***	***	***	***	***
Total	***	***	***	***	***	***

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

## Changes in operations

As presented in table VII-50 Essen reported operational and organizational changes since January 1, 2017.

**Table VII-50**  
**PC strand: Essen's reported changes in operations, since January 1, 2017**

Item / Firm	Reported changed in operations
<b>Plant openings:</b>	
***	***

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

## Operations on PC strand

Table VII-51 presents information on the PC strand operations of Essen during 2017-19 and projections for calendar years 2020 and 2021. \*\*\*.<sup>78</sup> Essen's capacity \*\*\*. Its PC strand production \*\*\* and capacity utilization \*\*\*. Commercial home market shipments \*\*\*. \*\*\*. Essen indicated that its shipments will continue to be \*\*\*.<sup>79</sup>

<sup>78</sup> According to its website, Essen was established in 2016 in the Khalifa Industrial Zone of Abu Dhabi. <http://essensteel.com/#about>.

<sup>79</sup> Essen indicated that \*\*\*." Email message from \*\*\*, May 4, 2020.

**Table VII-51**

**PC strand: Data for Essen, 2017-19 and projections for calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
End-of-period inventories	***	***	***	***	***
Shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Capacity utilization	***	***	***	***	***
Inventories/production	***	***	***	***	***
Inventories/total shipments	***	***	***	***	***
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***
Total home market shipments	***	***	***	***	***
Export shipments to:					
United States	***	***	***	***	***
All other markets	***	***	***	***	***
Total exports	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## Alternative products

Essen indicated \*\*\*.

## Exports

According to GTA, the leading export markets for PC strand from UAE are the United States and United Kingdom (table VII-52). During 2019, the United States was the top export market for PC strand from UAE, accounting for 51.5 percent, followed by the United Kingdom, accounting for 19.7 percent.



**Table VII-52**  
**PC strand: Exports from UAE, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	7,492	4,827	7,077
United Kingdom	2,784	3,032	2,707
Netherlands	1,668	1,010	1,120
India	243	285	1,023
China	16	12	445
Pakistan	364	624	317
Germany	443	875	194
Brazil	168	68	139
Singapore	208	739	112
All other destination markets	21,594	13,021	605
Total exports	34,980	24,493	13,739
	<b>Value (1,000 dollars)</b>		
United States	5,781	4,272	2,559
United Kingdom	1,596	2,126	2,117
Netherlands	1,051	729	821
India	214	593	1,420
China	3	34	748
Pakistan	921	989	422
Germany	575	857	264
Brazil	110	43	96
Singapore	243	777	103
All other destination markets	13,375	11,532	693
Total exports	23,869	21,952	9,243

Table continued on next page.

**Table VII-52--Continued**  
**PC strand: Exports from UAE, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	772	885	362
United Kingdom	573	701	782
Netherlands	630	722	733
India	881	2,081	1,388
China	188	2,833	1,681
Pakistan	2,530	1,585	1,331
Germany	1,298	979	1,361
Brazil	655	632	691
Singapore	1,168	1,051	920
All other destination markets	619	886	1,145
Total exports	682	896	673
	<b>Share of quantity (percent)</b>		
United States	21.4	19.7	51.5
United Kingdom	8.0	12.4	19.7
Netherlands	4.8	4.1	8.2
India	0.7	1.2	7.4
China	0.0	0.0	3.2
Pakistan	1.0	2.5	2.3
Germany	1.3	3.6	1.4
Brazil	0.5	0.3	1.0
Singapore	0.6	3.0	0.8
All other destination markets	61.7	53.2	4.4
Total exports	100.0	100.0	100.0

Note.--Shares and ratios shown as "0.0" represent values greater than zero, but less than "0.05" percent. United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Source: Official imports statistics of imports from United Arab Emirates (constructed export statistics for United Arab Emirates) under HS subheading 7312.10 as reported by various statistical reporting authorities in the Global Trade Atlas database, accessed May 13, 2020.

## Subject countries combined

Table VII-53 presents summary data on PC strand operations of the reporting subject producers in the subject countries during 2017-19 and projections for calendar years 2020 and 2021. Subject country producers have a combined total annual capacity of 1.87 billion pounds during 2019. The overall capacity for the combined subject producers' increased by 20.4 percent from 2017 to 2019. Subject country producers produced over 1.18 billion pounds during 2019. Their combined PC strand production decreased by 1.0 percent from 2017 to 2019

and capacity utilization also fluctuated but decreased by 6.7 percentage points from 2017 to 2019. In addition, end-of-period inventories increased more than double during 2017-19.<sup>80</sup> Commercial home market shipments fluctuated but decreased by 14.0 percent from 2017 to 2019.

Total shipments for the combined subject producers decreased by 3.7 percent from 2017 to 2019. Exports of PC strand to the United States increased by 15.0 percent from 2017 to 2019. Exports to all other markets fluctuated but decreased by 6.8 percent during 2017-19. As a share of total shipments, exports to the United States increased by 3.0 percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments decreased by 1.3 percentage points, while total exports as a share of total shipments increased by 1.6 percentage points and was 59.5 percent of total shipments in 2019.

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<sup>80</sup> Projections indicate that the combined subject producers' capacity and production are expected to increase from 2019 levels to 2021 projections by 2.2 percent and 21.5 percent, respectively. Their projections of exports to the United States of PC strand are projected to decrease compared to 2019 levels in 2021 by 10.2 percent. Capacity utilization, commercial shipments, exports to other markets, total exports, and total shipments are all projected to increase during 2020 and 2021.

**Table VII-53**

**PC strand: Data on the industry in subject countries, 2017-19 and projection calendar years 2020 and 2021**

Item	Calendar year				
	Actual experience			Projections	
	2017	2018	2019	2020	2021
	<b>Quantity (1,000 pounds)</b>				
Capacity	1,550,440	1,656,905	1,866,630	1,874,266	1,907,450
Production	1,195,636	1,328,393	1,184,147	1,264,215	1,438,985
End-of-period inventories	56,027	110,292	112,085	103,142	96,828
Shipments:					
Home market shipments:					
Internal consumption/ transfers	57,521	53,861	82,912	74,084	88,962
Commercial home market shipments	460,089	465,588	395,767	432,457	517,842
Total home market shipments	517,610	519,449	478,679	506,541	606,804
Export shipments to:					
United States	189,801	210,959	218,351	181,692	196,110
All other markets	521,040	543,598	485,845	585,270	642,385
Total exports	710,841	754,557	704,196	766,962	838,495
Total shipments	1,228,451	1,274,006	1,182,875	1,273,503	1,445,299
	<b>Ratios and shares (percent)</b>				
Capacity utilization	77.1	80.2	63.4	67.5	75.4
Inventories/production	4.7	8.3	9.5	8.2	6.7
Inventories/total shipments	4.6	8.7	9.5	8.1	6.7
Share of shipments:					
Home market shipments:					
Internal consumption/ transfers	4.7	4.2	7.0	5.8	6.2
Commercial home market shipments	37.5	36.5	33.5	34.0	35.8
Total home market shipments	42.1	40.8	40.5	39.8	42.0
Export shipments to:					
United States	15.5	16.6	18.5	14.3	13.6
All other markets	42.4	42.7	41.1	46.0	44.4
Total exports	57.9	59.2	59.5	60.2	58.0
Total shipments	100.0	100.0	100.0	100.0	100.0

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

## U.S. inventories of imported merchandise

Table VII-54 presents data on U.S. importers' reported inventories of PC strand during 2017-19. Inventories from subject sources, nonsubject sources, and all import sources all increased during 2017-19. Inventories from all import sources increased by \*\*\* percent during 2017-19.

**Table VII-54**  
**PC strand: U.S. importers' inventories, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Inventories (1,000 pounds); Ratios (percent)		
Imports from Argentina Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Colombia Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Egypt Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Indonesia Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Italy Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Malaysia Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

Table continued on next page.

**Table VII-54--Continued**  
**PC strand: U.S. importers' inventories, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Inventories (1,000 pounds); Ratios (percent)</b>		
Imports from Netherlands Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Saudi Arabia Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from South Africa Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Spain Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Taiwan Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Tunisia Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

Table continued on next page.

**Table VII-54--Continued**  
**PC strand: U.S. importers' inventories, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Inventories (1,000 pounds); Ratios (percent)		
Imports from Turkey Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from Ukraine Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from UAE Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from nonsubject sources: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***
Imports from all import sources: Inventories	***	***	***
Ratio to U.S. imports	***	***	***
Ratio to U.S. shipments of imports	***	***	***
Ratio to total shipments of imports	***	***	***

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. importers' outstanding orders

The Commission requested importers to indicate whether they imported or arranged for the importation of PC strand from subject, nonsubject and all import sources after January 1, 2020 through December 31, 2020. Table VII-55 present data on the arranged imports for PC strand during January 1, 2020 through December 31, 2020. Subject sources accounted for \*\*\* percent of arranged imports during the calendar year 2020.

**Table VII-55**  
**PC strand: Arranged imports, January 2020 through December 2020**

Item	Period				Total
	Jan-Mar 2020	Apr-Jun 2020	Jul-Sept 2020	Oct-Dec 2020	
	Quantity (1,000 pounds)				
Arranged U.S. imports from.--					
Argentina	***	***	***	***	***
Colombia	***	***	***	***	***
Egypt	***	***	***	***	***
Indonesia	***	***	***	***	***
Italy	***	***	***	***	***
Malaysia	***	***	***	***	***
Netherlands	***	***	***	***	***
Saudi Arabia	***	***	***	***	***
South Africa	***	***	***	***	***
Spain	***	***	***	***	***
Taiwan	***	***	***	***	***
Tunisia	***	***	***	***	***
Turkey	***	***	***	***	***
Ukraine	***	***	***	***	***
UAE	***	***	***	***	***
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

## Antidumping or countervailing duty orders in third-country markets

Based on available information, PC strand from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates have not been subject to antidumping or countervailing duty investigations outside the United States during the last 5 years.

## Information on nonsubject countries

Table VII-57 presents global export data for HS-7312.10, a category that includes PC strand and out-of-scope products, (by source in descending order of quantity for 2019). The value of global exports of PC strand increased by 2.9 percent (\$160 million) from 2017-19. China was the largest global exporter of these products, based on value and quantity, and accounted for 25.8 percent of global exports by value and 39.8 percent of global exports by quantity in 2019. The largest global exporters based on value of PC strand were, in descending order of magnitude, China, South Korea, Germany, the United States, and Thailand.



**Table VII-56**  
**PC strand: Global exports by exporter, 2017-19**

Exporter	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
United States	137,886	141,195	105,562
Argentina	19,903	4,215	3,291
Colombia	7,236	5,364	3,574
Egypt	971	630	972
Indonesia	109,971	140,284	151,475
Italy	287,571	267,176	221,952
Malaysia	248,637	224,305	271,005
Netherlands	75,495	89,554	88,132
Saudi Arabia	28,607	57,949	---
South Africa	52,732	53,299	47,737
Spain	100,288	110,989	116,239
Taiwan	15,794	11,991	13,373
Tunisia	55,234	45,260	29,290
Turkey	154,698	182,258	230,676
Ukraine	9,544	17,838	14,046
UAE	34,980	24,493	13,739
Subject exporters	1,339,547	1,376,799	1,311,062
China	2,464,042	2,509,237	2,700,280
South Korea	560,300	533,339	494,461
Thailand	311,400	385,745	349,503
Germany	226,734	233,954	221,549
Portugal	231,624	196,022	182,353
Romania	155,210	171,301	179,586
India	134,843	168,477	164,780
Belgium	38,219	136,210	154,681
All other exporters	1,637,235	1,625,786	1,077,433
Nonsubject exporters	5,759,607	5,960,071	5,524,626
All exporters	7,099,154	7,336,871	6,835,688

Table continued on next page.

**Table VII-56--Continued**  
**PC strand: Global exports by exporter, 2017-19**

Exporter	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
United States	251,519	285,238	263,363
Argentina	19,493	3,926	2,223
Colombia	4,919	4,276	3,278
Egypt	857	605	354
Indonesia	90,929	108,203	109,582
Italy	227,083	251,285	196,283
Malaysia	129,462	132,602	157,537
Netherlands	96,268	120,046	104,434
Saudi Arabia	17,973	37,299	---
South Africa	31,971	43,306	34,291
Spain	93,160	109,707	108,718
Taiwan	15,890	14,299	16,402
Tunisia	21,095	20,721	12,249
Turkey	110,776	144,132	155,844
Ukraine	5,627	9,960	9,075
UAE	23,869	21,952	9,243
Subject exporters	1,140,891	1,307,557	1,182,876
China	1,486,432	1,745,689	1,802,398
South Korea	509,785	529,049	490,401
Thailand	178,200	238,949	222,588
Germany	387,177	443,469	426,465
Portugal	114,142	119,679	102,966
Romania	160,876	186,914	193,183
India	70,668	104,504	104,959
Belgium	49,102	192,173	183,639
All other exporters	1,655,684	1,847,845	1,203,408
Nonsubject exporters	4,612,066	5,408,271	4,730,007
All exporters	5,752,957	6,715,828	5,912,883

Table continued on next page.

**Table VII-56--Continued**  
**PC strand: Global exports by exporter, 2017-19**

Exporter	Calendar year		
	2017	2018	2019
	<b>Unit value (dollars per 1,000 pounds)</b>		
United States	1,824	2,020	2,495
Argentina	979	931	675
Colombia	680	797	917
Egypt	883	960	364
Indonesia	827	771	723
Italy	790	941	884
Malaysia	521	591	581
Netherlands	1,275	1,340	1,185
Saudi Arabia	628	644	---
South Africa	606	813	718
Spain	929	988	935
Taiwan	1,006	1,192	1,226
Tunisia	382	458	418
Turkey	716	791	676
Ukraine	590	558	646
UAE	682	896	673
Subject exporters	852	950	902
China	603	696	667
South Korea	910	992	992
Thailand	572	619	637
Germany	1,708	1,896	1,925
Portugal	493	611	565
Romania	1,037	1,091	1,076
India	524	620	637
Belgium	1,285	1,411	1,187
All other exporters	1,011	1,137	1,117
Nonsubject exporters	801	907	856
All exporters	810	915	865

Table continued on next page.

**Table VII-56--Continued**  
**PC strand: Global exports by exporter, 2017-19**

Exporter	Calendar year		
	2017	2018	2019
	<b>Share of quantity (percent)</b>		
United States	1.9	1.9	1.5
Argentina	0.3	0.1	0.0
Colombia	0.1	0.1	0.1
Egypt	0.0	0.0	0.0
Indonesia	1.5	1.9	2.2
Italy	4.1	3.6	3.2
Malaysia	3.5	3.1	4.0
Netherlands	1.1	1.2	1.3
Saudi Arabia	0.4	0.8	---
South Africa	0.7	0.7	0.7
Spain	1.4	1.5	1.7
Taiwan	0.2	0.2	0.2
Tunisia	0.8	0.6	0.4
Turkey	2.2	2.5	3.4
Ukraine	0.1	0.2	0.2
UAE	0.5	0.3	0.2
Subject exporters	18.9	18.8	19.2
China	34.7	34.2	39.5
South Korea	7.9	7.3	7.2
Thailand	4.4	5.3	5.1
Germany	3.2	3.2	3.2
Portugal	3.3	2.7	2.7
Romania	2.2	2.3	2.6
India	1.9	2.3	2.4
Belgium	0.5	1.9	2.3
All other exporters	23.1	22.2	15.8
Nonsubject exporters	81.1	81.2	80.8
All exporters	100.0	100.0	100.0

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

Note.--Exports for Egypt, Saudi Arabia, Tunisia and UAE were constructed using trading partner imports data (mirror stats).

Source: Official import and export statistics under HS subheading 7312.10 reported by various national statistical authorities in the Global Trade Atlas database, accessed May 13, 2020.

**APPENDIX A**

***FEDERAL REGISTER* NOTICES**



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://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
85 FR 22751, April 23, 2020	<i>Prestressed Concrete Steel Wire Strand (“PC strand”) From Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates; Institution of Antidumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-04-23/pdf/2020-08576.pdf">https://www.govinfo.gov/content/pkg/FR-2020-04-23/pdf/2020-08576.pdf</a>
85 FR 28605, May 13, 2020	<i>Prestressed Concrete Steel Wire Strand From Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, the Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, the Republic of Turkey, Ukraine, and the United Arab Emirates: Initiation of Less-Than-Fair-Value Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10233.pdf">https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10233.pdf</a>
85 FR 28610, May 13, 2020	<i>Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Initiation of Countervailing Duty Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10234.pdf">https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10234.pdf</a>





**APPENDIX B**

**LIST OF STAFF CONFERENCE WITNESSES**



## CALENDAR OF PRELIMINARY CONFERENCE

Those listed below participated in the United States International Trade Commission's preliminary conference. The Commission conducted its preliminary conference through submissions of written testimony and postconference briefs:

**Subject:** Prestressed Concrete Steel Wire Strand ("PC strand") from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and United Arab Emirates

**Inv. Nos.:** 701-TA-646 and 731-TA-1502-1516 (Preliminary)

**Date:** May 12, 2020

### **EMBASSY APPEARANCES:**

**Embassy of Egypt  
Washington, DC**

**Ibrahim El Seginy, Head of Trade Remedies Sector**

**United Arab Emirates  
Abu, Dhabi**

**Abdullah Sultan Al fan Alshamsi, Assistant Undersecretary,  
Trade Remedies Sector**

### **OPENING REMARKS:**

In Support of Imposition (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)  
In Opposition to Imposition (**John Gurley**, Arent Fox LLP)  
In Opposition to Imposition (**Shaymaa Bayoumi**, Government of Egypt)  
In Opposition to Imposition (**Jay Campbell**, White and Case)

**In Support of the Imposition of  
Antidumping and Countervailing Duty Orders:**

Kelley Drye & Warren LLP  
Washington, DC  
on behalf of

Insteel Wire Products Company  
Sumiden Wire Products Corporation  
Wire Mesh Corporation

**In Support of the Imposition of  
Antidumping and Countervailing Duty Orders (continued):**

**H.O. Woltz III**, President and Chief Executive Officer,  
Insteel Wire Products Company

**Jon Cornelius**, Executive Vice President and General Manager,  
PC Strand Division, Sumiden Wire Products Corporation

**Jordi Barrenechea**, President, Wire Mesh Corporation

**Gina E. Beck**, Senior Trade Analyst, Georgetown Economic Services LLC

**Brad Hudgens**, Senior Trade Analyst, Georgetown Economic Services LLC

**Kathleen W. Cannon** )  
**Paul C. Rosenthal** )  
**R. Alan Luberda** ) – OF COUNSEL  
**Brooke M. Ringel** )  
**Elizabeth C. Johnson** )

**In Opposition to the Imposition of  
Antidumping and Countervailing Duty Orders:**

Doyle, Barlow & Mazard PLLC  
Washington, DC  
on behalf of

PJSC PA Stalkanat-Silur (“Silur”)

**Serhiy Lavrynenko**, General Director, Silur

**Camelia C. Mazard** ) – OF COUSEL

Arent Fox LLP  
Washington, DC  
on behalf of

Athamor Steel LLC,  
Chia Ta World Co., Ltd.  
WBO Italcables Societa’ Cooperativa  
Concrete Reinforcing Products

Athamor Steel LLC (“Athamor”)

**Patrick Gregoire**, CEO, Athamor

**In Opposition to the Imposition of  
Antidumping and Countervailing Duty Orders (continued):**

Chia Ta World Ltd (“Chia Ta”)

**Jeng-Ping Chen**, CEO, Chia Ta

**John Gurley** )  
 ) – OF COUNSEL  
**Matthew Nolan** )

White and Case LLP  
Washington, DC  
on behalf of

National Metal and Manufacturing & Casting Co. (Maadaniyah)

**Jay Campbell** ) – OF COUNSEL

Appleton Luff PTE LTD  
Washington, DC  
on behalf of

United Wires Elsewedy Co.,

**Mahmoud Shaarawy**, Group Legal Director, United Wires Elsewedy Co.

**Edmund W. Sim** ) – OF COUSEL

**-END-**



**APPENDIX C**  
**SUMMARY DATA**





**Table C-1**

**PC strand: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
<b>U.S. consumption quantity:</b>						
Amount.....	946,721	984,664	954,519	▲0.8	▲4.0	▼(3.1)
Producers' share (fn1).....	70.3	71.0	67.2	▼(3.2)	▲0.7	▼(3.8)
Importers' share (fn1):						
Argentina.....	---	0.2	0.6	▲0.6	▲0.2	▲0.4
Colombia.....	2.8	2.5	2.5	▼(0.3)	▼(0.4)	▲0.0
Egypt.....	---	---	0.1	▲0.1	---	▲0.1
Indonesia.....	0.1	1.1	1.5	▲1.4	▲1.0	▲0.4
Italy.....	2.2	1.5	2.5	▲0.3	▼(0.7)	▲1.0
Malaysia.....	7.5	7.0	7.1	▼(0.4)	▼(0.5)	▲0.1
Netherlands.....	0.3	0.2	0.3	▼(0.0)	▼(0.1)	▲0.1
Saudi Arabia.....	0.8	1.9	0.4	▼(0.4)	▲1.1	▼(1.5)
South Africa.....	2.2	2.1	1.9	▼(0.3)	▼(0.1)	▼(0.2)
Spain.....	2.8	1.6	4.4	▲1.6	▼(1.2)	▲2.8
Taiwan.....	0.3	1.1	0.7	▲0.4	▲0.8	▼(0.4)
Tunisia.....	2.4	2.6	2.6	▲0.2	▲0.1	▲0.1
Turkey.....	3.2	2.8	3.8	▲0.6	▼(0.4)	▲0.9
Ukraine.....	0.1	0.4	0.3	▲0.2	▲0.4	▼(0.2)
UAE.....	0.5	0.1	0.7	▲0.2	▼(0.4)	▲0.7
Subject sources.....	25.1	25.0	29.4	▲4.2	▼(0.2)	▲4.4
Nonsubject sources.....	4.5	4.0	3.5	▼(1.0)	▼(0.5)	▼(0.6)
All import sources.....	29.7	29.0	32.8	▲3.2	▼(0.7)	▲3.8
<b>U.S. consumption value:</b>						
Amount.....	391,676	489,978	450,340	▲15.0	▲25.1	▼(8.1)
Producers' share (fn1).....	74.9	73.6	71.4	▼(3.5)	▼(1.3)	▼(2.2)
Importers' share (fn1):						
Argentina.....	---	0.2	0.6	▲0.6	▲0.2	▲0.4
Colombia.....	2.3	2.2	2.2	▼(0.2)	▼(0.2)	▲0.0
Egypt.....	---	---	0.1	▲0.1	---	▲0.1
Indonesia.....	0.1	0.9	1.2	▲1.1	▲0.8	▲0.3
Italy.....	1.9	1.5	2.4	▲0.6	▼(0.4)	▲0.9
Malaysia.....	6.1	6.2	6.0	▼(0.1)	▲0.1	▼(0.2)
Netherlands.....	0.5	0.3	0.4	▼(0.1)	▼(0.2)	▲0.1
Saudi Arabia.....	0.7	1.6	0.3	▼(0.3)	▲0.9	▼(1.3)
South Africa.....	1.8	1.8	1.7	▼(0.1)	▲0.1	▼(0.2)
Spain.....	2.4	1.6	3.7	▲1.3	▼(0.8)	▲2.1
Taiwan.....	0.3	1.0	0.7	▲0.4	▲0.8	▼(0.4)
Tunisia.....	2.0	2.2	2.2	▲0.2	▲0.3	▼(0.0)
Turkey.....	2.7	2.6	3.2	▲0.5	▼(0.1)	▲0.6
Ukraine.....	0.0	0.4	0.2	▲0.2	▲0.3	▼(0.2)
UAE.....	0.5	0.1	0.5	▲0.0	▼(0.4)	▲0.5
Subject sources.....	21.2	22.5	25.3	▲4.2	▲1.3	▲2.8
Nonsubject sources.....	4.0	3.9	3.3	▼(0.7)	▼(0.0)	▼(0.7)
All import sources.....	25.1	26.4	28.6	▲3.5	▲1.3	▲2.2

Table continued.

**Table C-1--Continued**

**PC strand: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. imports from:						
Argentina:						
Quantity.....	---	2,196	6,125	▲***	▲***	▲178.9
Value.....	---	1,083	2,599	▲***	▲***	▲139.9
Unit value.....	---	\$493	\$424	▲***	▲***	▼(14.0)
Ending inventory quantity.....	***	***	***	***	▲***	▼***
Colombia:						
Quantity.....	26,649	24,241	23,840	▼(10.5)	▼(9.0)	▼(1.7)
Value.....	9,156	10,594	9,846	▲7.5	▲15.7	▼(7.1)
Unit value.....	\$344	\$437	\$413	▲20.2	▲27.2	▼(5.5)
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***
Egypt:						
Quantity.....	---	---	968	▲***	---	▲***
Value.....	---	---	372	▲***	---	▲***
Unit value.....	---	---	\$384	▲***	---	▲***
Ending inventory quantity.....	***	***	***	▲***	***	▲***
Indonesia:						
Quantity.....	634	10,350	13,890	▲2,091.1	▲1,532.6	▲34.2
Value.....	213	4,416	5,380	▲2,423.5	▲1,971.5	▲21.8
Unit value.....	\$336	\$427	\$387	▲15.2	▲26.9	▼(9.2)
Ending inventory quantity.....	***	***	***	***	▲***	▼***
Italy:						
Quantity.....	21,227	14,819	24,305	▲14.5	▼(30.2)	▲64.0
Value.....	7,379	7,382	10,984	▲48.9	▲0.0	▲48.8
Unit value.....	\$348	\$498	\$452	▲30.0	▲43.3	▼(9.3)
Ending inventory quantity.....	***	***	***	▲***	▲***	▲***
Malaysia:						
Quantity.....	70,651	68,456	67,779	▼(4.1)	▼(3.1)	▼(1.0)
Value.....	23,838	30,263	27,129	▲13.8	▲27.0	▼(10.4)
Unit value.....	\$337	\$442	\$400	▲18.6	▲31.0	▼(9.5)
Ending inventory quantity.....	***	***	***	▲***	▼***	▲***
Netherlands:						
Quantity.....	3,133	1,978	2,888	▼(7.8)	▼(36.9)	▲46.0
Value.....	1,907	1,300	1,800	▼(5.6)	▼(31.8)	▲38.5
Unit value.....	\$609	\$657	\$623	▲2.4	▲7.9	▼(5.2)
Ending inventory quantity.....	***	***	***	***	***	***
Saudi Arabia:						
Quantity.....	7,732	18,591	3,647	▼(52.8)	▲140.4	▼(80.4)
Value.....	2,575	7,698	1,422	▼(44.8)	▲198.9	▼(81.5)
Unit value.....	\$333	\$414	\$390	▲17.1	▲24.3	▼(5.8)
Ending inventory quantity.....	***	***	***	***	***	***
South Africa:						
Quantity.....	20,422	20,367	17,905	▼(12.3)	▼(0.3)	▼(12.1)
Value.....	7,023	9,063	7,490	▲6.6	▲29.1	▼(17.4)
Unit value.....	\$344	\$445	\$418	▲21.6	▲29.4	▼(6.0)
Ending inventory quantity.....	***	***	***	▼***	▼***	▼***

Table continued.

**Table C-1--Continued**

**PC strand: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. imports from:--Continued						
Spain:						
Quantity.....	26,609	15,852	41,812	▲ 57.1	▼ (40.4)	▲ 163.8
Value.....	9,437	7,703	16,501	▲ 74.8	▼ (18.4)	▲ 114.2
Unit value.....	\$355	\$486	\$395	▲ 11.3	▲ 37.0	▼ (18.8)
Ending inventory quantity.....	***	***	***	▼ ***	▼ ***	▼ ***
Taiwan:						
Quantity.....	2,589	10,676	6,288	▲ 142.9	▲ 312.3	▼ (41.1)
Value.....	1,014	5,092	3,056	▲ 201.3	▲ 402.1	▼ (40.0)
Unit value.....	\$392	\$477	\$486	▲ 24.0	▲ 21.8	▲ 1.9
Ending inventory quantity.....	***	***	***	▼ ***	▼ ***	▲ ***
Tunisia:						
Quantity.....	22,991	25,373	25,173	▲ 9.5	▲ 10.4	▼ (0.8)
Value.....	7,683	10,967	9,900	▲ 28.8	▲ 42.7	▼ (9.7)
Unit value.....	\$334	\$432	\$393	▲ 17.7	▲ 29.3	▼ (9.0)
Ending inventory quantity.....	***	***	***	***	***	***
Turkey:						
Quantity.....	30,378	27,889	35,971	▲ 18.4	▼ (8.2)	▲ 29.0
Value.....	10,580	12,603	14,311	▲ 35.3	▲ 19.1	▲ 13.6
Unit value.....	\$348	\$452	\$398	▲ 14.2	▲ 29.8	▼ (12.0)
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Ukraine:						
Quantity.....	529	4,385	2,796	▲ 428.8	▲ 729.4	▼ (36.2)
Value.....	187	1,836	987	▲ 429.0	▲ 884.4	▼ (46.3)
Unit value.....	\$353	\$419	\$353	▲ 0.0	▲ 18.7	▼ (15.7)
Ending inventory quantity.....	***	***	***	***	***	***
UAE:						
Quantity.....	4,542	612	6,884	▲ 51.6	▼ (86.5)	▲ 1,024.2
Value.....	1,891	250	2,359	▲ 24.8	▼ (86.8)	▲ 843.5
Unit value.....	\$416	\$408	\$343	▼ (17.7)	▼ (1.9)	▼ (16.1)
Ending inventory quantity.....	***	***	***	***	***	***
Subject sources:						
Quantity.....	238,086	245,786	280,272	▲ 17.7	▲ 3.2	▲ 14.0
Value.....	82,884	110,251	114,134	▲ 37.7	▲ 33.0	▲ 3.5
Unit value.....	\$348	\$449	\$407	▲ 17.0	▲ 28.9	▼ (9.2)
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▲ ***
Nonsubject sources:						
Quantity.....	42,710	39,750	33,094	▼ (22.5)	▼ (6.9)	▼ (16.7)
Value.....	15,609	19,343	14,813	▼ (5.1)	▲ 23.9	▼ (23.4)
Unit value.....	\$365	\$487	\$448	▲ 22.5	▲ 33.2	▼ (8.0)
Ending inventory quantity.....	***	***	***	▲ ***	▼ ***	▲ ***
All import sources:						
Quantity.....	280,796	285,536	313,366	▲ 11.6	▲ 1.7	▲ 9.7
Value.....	98,492	129,594	128,947	▲ 30.9	▲ 31.6	▼ (0.5)
Unit value.....	\$351	\$454	\$411	▲ 17.3	▲ 29.4	▼ (9.3)
Ending inventory quantity.....	***	***	***	▲ ***	▲ ***	▲ ***

Table continued.

**Table C-1--Continued**

**PC strand: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

	Reported data			Period changes		
	Calendar year			Comparison years		
	2017	2018	2019	2017-19	2017-18	2018-19
U.S. producers':						
Average capacity quantity.....	1,001,930	1,035,415	1,095,415	▲9.3	▲3.3	▲5.8
Production quantity.....	682,215	711,687	638,869	▼(6.4)	▲4.3	▼(10.2)
Capacity utilization (fn1).....	68.1	68.7	58.3	▼(9.8)	▲0.6	▼(10.4)
U.S. shipments:						
Quantity.....	665,925	699,128	641,153	▼(3.7)	▲5.0	▼(8.3)
Value.....	293,184	360,384	321,393	▲9.6	▲22.9	▼(10.8)
Unit value.....	\$440	\$515	\$501	▲13.9	▲17.1	▼(2.8)
Export shipments:						
Quantity.....	***	***	***	▼***	▼***	▼***
Value.....	***	***	***	▼***	▼***	▼***
Unit value.....	***	***	***	▲***	▲***	▼***
Ending inventory quantity.....	71,654	79,428	72,900	▲1.7	▲10.8	▼(8.2)
Inventories/total shipments (fn1).....	***	***	***	▲***	▲***	▲***
Production workers.....	411	398	378	▼(8.0)	▼(3.2)	▼(5.0)
Hours worked (1,000s).....	953	973	886	▼(7.0)	▲2.1	▼(8.9)
Wages paid (\$1,000).....	19,203	20,634	19,413	▲1.1	▲7.5	▼(5.9)
Hourly wages (dollars per hour).....	\$20.15	\$21.21	\$21.91	▲8.7	▲5.2	▲3.3
Productivity (pounds per hour).....	715.9	731.4	721.1	▲0.7	▲2.2	▼(1.4)
Unit labor costs.....	\$28.15	\$28.99	\$30.39	▲8.0	▲3.0	▲4.8
Net sales:						
Quantity.....	673,152	705,013	645,796	▼(4.1)	▲4.7	▼(8.4)
Value.....	297,177	364,160	323,996	▲9.0	▲22.5	▼(11.0)
Unit value.....	\$441	\$517	\$502	▲13.6	▲17.0	▼(2.9)
Cost of goods sold (COGS):						
Raw materials.....	195,701	258,739	236,645	▲20.9	▲32.2	▼(8.5)
Direct labor.....	17,583	19,163	17,544	▼(0.2)	▲9.0	▼(8.4)
Other factory costs.....	48,774	49,866	60,741	▲24.5	▲2.2	▲21.8
Total COGS.....	262,058	327,768	314,930	▲20.2	▲25.1	▼(3.9)
Gross profit or (loss) (fn2).....	35,119	36,392	9,066	▼(74.2)	▲3.6	▼(75.1)
SG&A expenses.....	19,021	21,125	17,521	▼(7.9)	▲11.1	▼(17.1)
Operating income or (loss) (fn2).....	16,098	15,267	(8,455)	▼***	▼(5.2)	▼***
Net income or (loss) (fn2).....	14,814	13,951	(9,487)	▼***	▼(5.8)	▼***
Capital expenditures.....	36,113	8,423	13,686	▼(62.1)	▼(76.7)	▲62.5
R&D expenses.....	***	***	***	▲***	▼***	▲***
Net assets.....	245,912	251,394	242,568	▼(1.4)	▲2.2	▼(3.5)
Operating return on assets (fn1).....	6.5	6.1	(3.5)	▼(10.0)	▼(0.5)	▼(9.6)
Unit COGS.....	\$389	\$465	\$488	▲25.3	▲19.4	▲4.9
Unit SG&A expenses.....	\$28	\$30	\$27	▼(4.0)	▲6.0	▼(9.5)
Unit operating income or (loss) (fn2).....	\$24	\$22	\$(13)	▼***	▼(9.4)	▼***
Unit net income or (loss) (fn2).....	\$22	\$20	\$(15)	▼***	▼(10.1)	▼***
COGS/sales (fn1).....	88.2	90.0	97.2	▲9.0	▲1.8	▲7.2
Operating income or (loss)/sales (fn1).....	5.4	4.2	(2.6)	▼(8.0)	▼(1.2)	▼(6.8)
Net income or (loss)/sales (fn1).....	5.0	3.8	(2.9)	▼(7.9)	▼(1.2)	▼(6.8)

Table continued.

**Table C-1--Continued**

**PC strand: Summary data concerning the U.S. market, 2017-19**

(Quantity=1,000 pounds; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per 1,000 pounds; Period changes=percent--exceptions noted)

Reported data			Period changes		
Calendar year			Comparison years		
2017	2018	2019	2017-19	2017-18	2018-19

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.

Source: Compiled from official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020 and from data submitted in response to Commission questionnaires.



**APPENDIX D**

**INTERCHANGEABILITY AND FACTORS OTHER THAN PRICE FOR ALL COUNTRY  
PAIRS**





U.S. producers' and importers' responses comparing the interchangeability of PC strand produced in each subject country and other subject countries and nonsubject countries, by country pair, are shown in table D-1. Firms' responses regarding the significance of factors other than price, by country pair, are shown in table D-2.

Table D-1

PC strand: Interchangeability between PC strand produced in the country pairs, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Argentina	4	---	---	---	---	1	---	---
United States vs. Colombia	4	---	---	---	1	---	1	---
United States vs. Egypt	4	---	---	---	1	1	1	---
United States vs. Indonesia	4	---	---	---	1	---	2	---
United States vs. Italy	4	---	---	---	1	2	1	---
United States vs. Malaysia	4	---	---	---	1	---	2	---
United States vs. Netherlands	4	---	---	---	---	1	---	---
United States vs. Saudi Arabia	4	---	---	---	---	---	2	---
United States vs. South Africa	4	---	---	---	2	---	1	---
United States vs. Spain	4	---	---	---	---	1	---	---
United States vs. Taiwan	4	---	---	---	---	1	---	---
United States vs. Tunisia	4	---	---	---	1	---	2	---
United States vs. Turkey	4	---	---	---	2	1	1	---
United States vs. Ukraine	4	---	---	---	---	---	2	---
United States vs. UAE	4	---	---	---	---	---	1	---
Argentina vs. Colombia	4	---	---	---	---	---	1	---
Argentina vs. Egypt	4	---	---	---	---	1	---	---
Argentina vs. Indonesia	4	---	---	---	---	---	1	---
Argentina vs. Italy	4	---	---	---	---	1	---	---
Argentina vs. Malaysia	4	---	---	---	---	---	1	---
Argentina vs. Netherlands	4	---	---	---	---	1	---	---
Argentina vs. Saudi Arabia	4	---	---	---	---	---	1	---
Argentina vs. South Africa	4	---	---	---	---	---	1	---
Argentina vs. Spain	4	---	---	---	---	1	---	---
Argentina vs. Taiwan	4	---	---	---	---	1	---	---
Argentina vs. Tunisia	4	---	---	---	---	---	1	---
Argentina vs. Turkey	4	---	---	---	---	1	---	---
Argentina vs. Ukraine	4	---	---	---	---	---	1	---
Argentina vs. UAE	4	---	---	---	---	---	1	---
Colombia vs. Egypt	4	---	---	---	1	---	1	---
Colombia vs. Indonesia	4	---	---	---	1	---	1	---
Colombia vs. Italy	4	---	---	---	1	---	1	---
Colombia vs. Malaysia	4	---	---	---	1	---	1	---
Colombia vs. Netherlands	4	---	---	---	---	---	1	---
Colombia vs. Saudi Arabia	4	---	---	---	---	---	1	---
Colombia vs. South Africa	4	---	---	---	1	---	1	---
Colombia vs. Spain	4	---	---	---	---	---	1	---
Colombia vs. Taiwan	4	---	---	---	---	---	1	---
Colombia vs. Tunisia	4	---	---	---	---	---	1	---
Colombia vs. Turkey	4	---	---	---	1	---	1	---
Colombia vs. Ukraine	4	---	---	---	---	---	1	---
Colombia vs. UAE	4	---	---	---	---	---	1	---

Table continued on next page.

Table D-1--continued

PC strand: Interchangeability between PC strand produced in the country pairs, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Egypt vs. Indonesia	4	---	---	---	1	---	1	---
Egypt vs. Italy	4	---	---	---	1	1	---	---
Egypt vs. Malaysia	4	---	---	---	1	---	1	---
Egypt vs. Netherlands	4	---	---	---	---	1	---	---
Egypt vs. Saudi Arabia	4	---	---	---	---	---	1	---
Egypt vs. South Africa	4	---	---	---	1	---	1	---
Egypt vs. Spain	4	---	---	---	---	1	---	---
Egypt vs. Taiwan	4	---	---	---	---	1	---	---
Egypt vs. Tunisia	4	---	---	---	---	---	1	---
Egypt vs. Turkey	4	---	---	---	1	1	---	---
Egypt vs. Ukraine	4	---	---	---	---	---	1	---
Egypt vs. UAE	4	---	---	---	---	---	1	---
Indonesia vs. Italy	4	---	---	---	1	---	1	---
Indonesia vs. Malaysia	4	---	---	---	1	---	1	---
Indonesia vs. Netherlands	4	---	---	---	---	---	1	---
Indonesia vs. Saudi Arabia	4	---	---	---	---	---	1	---
Indonesia vs. South Africa	4	---	---	---	1	---	1	---
Indonesia vs. Spain	4	---	---	---	---	---	1	---
Indonesia vs. Taiwan	4	---	---	---	---	---	1	---
Indonesia vs. Tunisia	4	---	---	---	---	---	1	---
Indonesia vs. Turkey	4	---	---	---	1	---	1	---
Indonesia vs. Ukraine	4	---	---	---	---	---	1	---
Indonesia vs. UAE	4	---	---	---	---	---	1	---
Italy vs. Malaysia	4	---	---	---	1	---	1	---
Italy vs. Netherlands	4	---	---	---	---	1	---	---
Italy vs. Saudi Arabia	4	---	---	---	---	---	1	---
Italy vs. South Africa	4	---	---	---	1	---	1	---
Italy vs. Spain	4	---	---	---	---	1	---	---
Italy vs. Taiwan	4	---	---	---	---	1	---	---
Italy vs. Tunisia	4	---	---	---	---	---	1	---
Italy vs. Turkey	4	---	---	---	1	1	---	---
Italy vs. Ukraine	4	---	---	---	---	---	1	---
Italy vs. UAE	4	---	---	---	---	---	1	---
Malaysia vs. Netherlands	4	---	---	---	---	---	1	---
Malaysia vs. Saudi Arabia	4	---	---	---	---	---	1	---
Malaysia vs. South Africa	4	---	---	---	1	---	1	---
Malaysia vs. Spain	4	---	---	---	---	---	1	---
Malaysia vs. Taiwan	4	---	---	---	---	---	1	---
Malaysia vs. Tunisia	4	---	---	---	---	---	1	---
Malaysia vs. Turkey	4	---	---	---	1	---	1	---
Malaysia vs. Ukraine	4	---	---	---	---	---	1	---
Malaysia vs. UAE	4	---	---	---	---	---	1	---

Table continued on next page.

Table D-1--continued

PC strand: Interchangeability between PC strand produced in the country pairs, by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Netherlands vs. Saudi Arabia	4	---	---	---	---	---	1	---
Netherlands vs. South Africa	4	---	---	---	---	---	1	---
Netherlands vs. Spain	4	---	---	---	---	1	---	---
Netherlands vs. Taiwan	4	---	---	---	---	1	---	---
Netherlands vs. Tunisia	4	---	---	---	---	---	1	---
Netherlands vs. Turkey	4	---	---	---	---	1	---	---
Netherlands vs. Ukraine	4	---	---	---	---	---	1	---
Netherlands vs. UAE	4	---	---	---	---	---	1	---
Saudi Arabia vs. South Africa	4	---	---	---	---	---	1	---
Saudi Arabia vs. Spain	4	---	---	---	---	---	1	---
Saudi Arabia vs. Taiwan	4	---	---	---	---	---	1	---
Saudi Arabia vs. Tunisia	4	---	---	---	---	---	1	---
Saudi Arabia vs. Turkey	4	---	---	---	---	---	1	---
Saudi Arabia vs. Ukraine	4	---	---	---	---	---	1	---
Saudi Arabia vs. UAE	4	---	---	---	---	---	1	---
South Africa vs. Spain	4	---	---	---	---	---	1	---
South Africa vs. Taiwan	4	---	---	---	---	---	1	---
South Africa vs. Tunisia	4	---	---	---	---	---	1	---
South Africa vs. Turkey	4	---	---	---	1	---	1	---
South Africa vs. Ukraine	4	---	---	---	---	---	1	---
South Africa vs. UAE	4	---	---	---	---	---	1	---
Spain vs. Taiwan	4	---	---	---	---	1	---	---
Spain vs. Tunisia	4	---	---	---	---	---	1	---
Spain vs. Turkey	4	---	---	---	---	1	---	---
Spain vs. Ukraine	4	---	---	---	---	---	1	---
Spain vs. UAE	4	---	---	---	---	---	1	---
Taiwan vs. Tunisia	4	---	---	---	---	---	1	---
Taiwan vs. Turkey	4	---	---	---	---	1	---	---
Taiwan vs. Ukraine	4	---	---	---	---	---	1	---
Taiwan vs. UAE	4	---	---	---	---	---	1	---
Tunisia vs. Turkey	4	---	---	---	1	---	1	---
Tunisia vs. Ukraine	4	---	---	---	---	---	1	---
Tunisia vs. UAE	4	---	---	---	---	---	1	---
Turkey vs. Ukraine	4	---	---	---	1	---	1	---
Turkey vs. UAE	4	---	---	---	---	---	1	---
Ukraine vs. UAE	3	---	---	---	---	---	1	---

Table continued on next page.

**Table D-1--continued**

**PC strand: Interchangeability between PC strand produced in the country pairs, by country pair**

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Other	4	---	---	---	1	2	---	---
Argentina vs. Other	4	---	---	---	1	1	---	---
Colombia vs. Other	4	---	---	---	1	---	1	---
Egypt vs. Other	4	---	---	---	1	1	---	---
Indonesia vs. Other	4	---	---	---	1	---	1	---
Italy vs. Other	4	---	---	---	1	1	---	---
Malaysia vs. Other	4	---	---	---	1	---	1	---
Netherlands vs. Other	4	---	---	---	1	1	---	---
Saudi Arabia vs. Other	4	---	---	---	1	---	1	---
South Africa vs. Other	4	---	---	---	1	---	1	---
Spain vs. Other	4	---	---	---	1	1	---	---
Taiwan vs. Other	4	---	---	---	1	1	---	---
Tunisia vs. Other	4	---	---	---	1	---	1	---
Turkey vs. Other	4	---	---	---	1	1	---	---
Ukraine vs. Other	4	---	---	---	1	---	1	---
UAE vs. Other	4	---	---	---	1	---	1	---

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

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

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

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

Table D-2

## C strand: Significance of differences other than price between PC strand by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Argentina	---	---	---	4	---	1	---	---
United States vs. Colombia	---	---	---	4	---	---	2	---
United States vs. Egypt	---	---	---	4	1	1	1	---
United States vs. Indonesia	---	---	---	4	1	---	2	---
United States vs. Italy	---	---	---	4	1	1	2	---
United States vs. Malaysia	---	---	---	4	1	---	2	---
United States vs. Netherlands	---	---	---	4	---	1	---	---
United States vs. Saudi Arabia	---	---	---	4	1	---	1	---
United States vs. South Africa	---	---	---	4	---	---	2	1
United States vs. Spain	---	---	---	4	---	1	---	---
United States vs. Taiwan	---	---	---	4	---	1	---	---
United States vs. Tunisia	---	---	---	4	1	---	2	---
United States vs. Turkey	---	---	---	4	1	1	2	---
United States vs. Ukraine	---	---	---	4	1	---	1	---
United States vs. UAE	---	---	---	4	---	---	1	---
Argentina vs. Colombia	---	---	---	4	---	---	1	---
Argentina vs. Egypt	---	---	---	4	---	1	---	---
Argentina vs. Indonesia	---	---	---	4	---	---	1	---
Argentina vs. Italy	---	---	---	4	---	1	---	---
Argentina vs. Malaysia	---	---	---	4	---	---	1	---
Argentina vs. Netherlands	---	---	---	4	---	1	---	---
Argentina vs. Saudi Arabia	---	---	---	4	---	---	1	---
Argentina vs. South Africa	---	---	---	4	---	---	1	---
Argentina vs. Spain	---	---	---	4	---	1	---	---
Argentina vs. Taiwan	---	---	---	4	---	1	---	---
Argentina vs. Tunisia	---	---	---	4	---	---	1	---
Argentina vs. Turkey	---	---	---	4	---	1	---	---
Argentina vs. Ukraine	---	---	---	4	---	---	1	---
Argentina vs. UAE	---	---	---	4	---	---	1	---
Colombia vs. Egypt	---	---	---	4	---	---	2	---
Colombia vs. Indonesia	---	---	---	4	---	---	2	---
Colombia vs. Italy	---	---	---	4	---	---	2	---
Colombia vs. Malaysia	---	---	---	4	---	---	2	---
Colombia vs. Netherlands	---	---	---	4	---	---	1	---
Colombia vs. Saudi Arabia	---	---	---	4	---	---	1	---
Colombia vs. South Africa	---	---	---	4	---	---	2	---
Colombia vs. Spain	---	---	---	4	---	---	1	---
Colombia vs. Taiwan	---	---	---	4	---	---	1	---
Colombia vs. Tunisia	---	---	---	4	---	---	1	---
Colombia vs. Turkey	---	---	---	4	---	---	2	---
Colombia vs. Ukraine	---	---	---	4	---	---	1	---
Colombia vs. UAE	---	---	---	4	---	---	1	---

Table continued on next page.

Table D-2--continued

PC strand: Significance of differences other than price between PC strand by country pair

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Egypt vs. Indonesia	---	---	---	4	---	---	2	---
Egypt vs. Italy	---	---	---	4	---	1	1	---
Egypt vs. Malaysia	---	---	---	4	---	---	2	---
Egypt vs. Netherlands	---	---	---	4	---	1	---	---
Egypt vs. Saudi Arabia	---	---	---	4	---	---	1	---
Egypt vs. South Africa	---	---	---	4	---	---	2	---
Egypt vs. Spain	---	---	---	4	---	1	---	---
Egypt vs. Taiwan	---	---	---	4	---	1	---	---
Egypt vs. Tunisia	---	---	---	4	---	---	1	---
Egypt vs. Turkey	---	---	---	4	---	1	1	---
Egypt vs. Ukraine	---	---	---	4	---	---	1	---
Egypt vs. UAE	---	---	---	4	---	---	1	---
Indonesia vs. Italy	---	---	---	4	---	---	2	---
Indonesia vs. Malaysia	---	---	---	4	---	---	2	---
Indonesia vs. Netherlands	---	---	---	4	---	---	1	---
Indonesia vs. Saudi Arabia	---	---	---	4	---	---	1	---
Indonesia vs. South Africa	---	---	---	4	---	---	2	---
Indonesia vs. Spain	---	---	---	4	---	---	1	---
Indonesia vs. Taiwan	---	---	---	4	---	---	1	---
Indonesia vs. Tunisia	---	---	---	4	---	---	1	---
Indonesia vs. Turkey	---	---	---	4	---	---	2	---
Indonesia vs. Ukraine	---	---	---	4	---	---	1	---
Indonesia vs. UAE	---	---	---	4	---	---	1	---
Italy vs. Malaysia	---	---	---	4	---	---	2	---
Italy vs. Netherlands	---	---	---	4	---	1	---	---
Italy vs. Saudi Arabia	---	---	---	4	---	---	1	---
Italy vs. South Africa	---	---	---	4	---	---	2	---
Italy vs. Spain	---	---	---	4	---	1	---	---
Italy vs. Taiwan	---	---	---	4	---	1	---	---
Italy vs. Tunisia	---	---	---	4	---	---	1	---
Italy vs. Turkey	---	---	---	4	---	1	1	---
Italy vs. Ukraine	---	---	---	4	---	---	1	---
Italy vs. UAE	---	---	---	4	---	---	1	---
Malaysia vs. Netherlands	---	---	---	4	---	---	1	---
Malaysia vs. Saudi Arabia	---	---	---	4	---	---	1	---
Malaysia vs. South Africa	---	---	---	4	---	---	2	---
Malaysia vs. Spain	---	---	---	4	---	---	1	---
Malaysia vs. Taiwan	---	---	---	4	---	---	1	---
Malaysia vs. Tunisia	---	---	---	4	---	---	1	---
Malaysia vs. Turkey	---	---	---	4	---	---	2	---
Malaysia vs. Ukraine	---	---	---	4	---	---	1	---
Malaysia vs. UAE	---	---	---	4	---	---	1	---

Table continued on next page.

**Table D-2--continued**

**PC strand: Significance of differences other than price between PC strand by country pair**

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
Netherlands vs. Saudi Arabia	---	---	---	4	---	---	1	---
Netherlands vs. South Africa	---	---	---	4	---	---	1	---
Netherlands vs. Spain	---	---	---	4	---	1	---	---
Netherlands vs. Taiwan	---	---	---	4	---	1	---	---
Netherlands vs. Tunisia	---	---	---	4	---	---	1	---
Netherlands vs. Turkey	---	---	---	4	---	1	---	---
Netherlands vs. Ukraine	---	---	---	4	---	---	1	---
Netherlands vs. UAE	---	---	---	4	---	---	1	---
Saudi Arabia vs. South Africa	---	---	---	4	---	---	1	---
Saudi Arabia vs. Spain	---	---	---	4	---	---	1	---
Saudi Arabia vs. Taiwan	---	---	---	4	---	---	1	---
Saudi Arabia vs. Tunisia	---	---	---	4	---	---	1	---
Saudi Arabia vs. Turkey	---	---	---	4	---	---	1	---
Saudi Arabia vs. Ukraine	---	---	---	4	---	---	1	---
Saudi Arabia vs. UAE	---	---	---	4	---	---	1	---
South Africa vs. Spain	---	---	---	4	---	---	2	---
South Africa vs. Taiwan	---	---	---	4	---	---	1	---
South Africa vs. Tunisia	---	---	---	4	---	---	1	---
South Africa vs. Turkey	---	---	---	4	---	---	2	---
South Africa vs. Ukraine	---	---	---	4	---	---	1	---
South Africa vs. UAE	---	---	---	4	---	---	1	---
Spain vs. Taiwan	---	---	---	4	---	1	---	---
Spain vs. Tunisia	---	---	---	4	---	---	1	---
Spain vs. Turkey	---	---	---	4	---	1	---	---
Spain vs. Ukraine	---	---	---	4	---	---	1	---
Spain vs. UAE	---	---	---	4	---	---	1	---
Taiwan vs. Tunisia	---	---	---	4	---	---	1	---
Taiwan vs. Turkey	---	---	---	4	---	1	---	---
Taiwan vs. Ukraine	---	---	---	4	---	---	1	---
Taiwan vs. UAE	---	---	---	4	---	---	1	---
Tunisia vs. Turkey	---	---	---	4	---	---	2	---
Tunisia vs. Ukraine	---	---	---	4	---	---	1	---
Tunisia vs. UAE	---	---	---	4	---	---	1	---
Turkey vs. Ukraine	---	---	---	5	---	---	2	---
Turkey vs. UAE	---	---	---	4	---	---	1	---
Ukraine vs. UAE	---	---	---	4	---	---	1	---

Table continued on next page.



**Table D-2--continued**

**PC strand: Significance of differences other than price between PC strand produced in the country pairs, by country pair**

Country pair	U.S. producers				U.S. importers			
	A	F	S	N	A	F	S	N
United States vs. Other	---	---	---	4	---	1	2	---
Argentina vs. Other	---	---	---	4	---	1	1	---
Colombia vs. Other	---	---	---	4	---	---	2	---
Egypt vs. Other	---	---	---	4	---	1	1	---
Indonesia vs. Other	---	---	---	4	---	---	2	---
Italy vs. Other	---	---	---	4	---	1	1	---
Malaysia vs. Other	---	---	---	4	---	---	2	---
Netherlands vs. Other	---	---	---	4	---	1	1	---
Saudi Arabia vs. Other	---	---	---	4	---	---	2	---
South Africa vs. Other	---	---	---	4	---	---	2	---
Spain vs. Other	---	---	---	4	---	1	1	---
Taiwan vs. Other	---	---	---	4	---	1	1	---
Tunisia vs. Other	---	---	---	4	---	---	2	---
Turkey vs. Other	---	---	---	4	---	1	1	---
Ukraine vs. Other	---	---	---	4	---	---	2	---
UAE vs. Other	---	---	---	4	---	---	2	---

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

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



**APPENDIX E**

**U.S. SHIPMENTS BY APPLICATION, 2017-19**



**Table E-1**  
**PC strand: U.S. producers' U.S. shipments by application, 2017-19**

\* \* \* \* \*

**Table E-2**  
**PC strand: U.S. importers' U.S. shipments from Argentina by product type, 2017-19**

\* \* \* \* \*

**Table E-3**  
**PC strand: U.S. importers' U.S. shipments from Colombia by product type, 2017-19**

\* \* \* \* \*

**Table E-4**  
**PC strand: U.S. importers' U.S. shipments from Egypt by product type, 2017-19**

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\* \* \* \* \*



**Table E-5**  
**PC strand: U.S. importers' U.S. shipments from Indonesia by product type, 2017-19**

\* \* \* \* \*

**Table E-6**  
**PC strand: U.S. importers' U.S. shipments from Italy by product type, 2017-19**

\* \* \* \* \*

**Table E-7**  
**PC strand: U.S. importers' U.S. shipments from Malaysia by product type, 2017-19**

\* \* \* \* \*

**Table E-8**  
**PC strand: U.S. importers' U.S. shipments from Netherlands by product type, 2017-19**

\* \* \* \* \*

**Table E-9**  
**PC strand: U.S. importers' U.S. shipments from Saudi Arabia by product type, 2017-19**

\* \* \* \* \*

**Table E-10**  
**PC strand: U.S. importers' U.S. shipments from South Africa by product type, 2017-19**

\* \* \* \* \*

**Table E-11**  
**PC strand: U.S. importers' U.S. shipments from Spain by product type, 2017-19**

\* \* \* \* \*

**Table E-12**  
**PC strand: U.S. importers' U.S. shipments from Taiwan by product type, 2017-19**

\* \* \* \* \*



**Table E-13**  
**PC strand: U.S. importers' U.S. shipments from Tunisia by product type, 2017-19**

\* \* \* \* \*

**Table E-14**  
**PC strand: U.S. importers' U.S. shipments from Turkey by product type, 2017-19**

\* \* \* \* \*

**Table E-15**  
**PC strand: U.S. importers' U.S. shipments from Argentina by product type, 2017-19**

\* \* \* \* \*

**Table E-16**  
**PC strand: U.S. importers' U.S. shipments from United Arab Emirates by product type, 2017-19**

\* \* \* \* \*

**Table E-17**  
**PC strand: U.S. importers' U.S. shipments from subject sources by product type, 2017-19**

\* \* \* \* \*

**Table E-18**  
**PC strand: U.S. importers' U.S. shipments from nonsubject sources by product type, 2017-19**

\* \* \* \* \*

**Table E-19**  
**PC strand: U.S. importers' U.S. shipments from all import sources by product type, 2017-19**

\* \* \* \* \*





**APPENDIX F**

**U.S. IMPORTS, UNCOVERED, BY SOURCE, 2017-19**



U.S. importers' responses comparing covered and uncovered PC strand imported from each subject country, combined subject countries, and nonsubject countries are shown in table F-1 (uncovered by source). Firms' responses for covered by source, are shown in table F-2.

**Table F-1**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. imports from.--			
Argentina	---	2,196	6,125
Colombia	26,649	24,241	23,840
Egypt	---	---	968
Indonesia	634	10,350	13,890
Italy	21,227	14,819	24,305
Malaysia	70,651	68,456	67,779
Netherlands	3,133	1,978	2,888
Saudi Arabia	7,732	18,591	3,647
South Africa	20,422	20,367	17,905
Spain	26,609	15,852	41,810
Taiwan	2,589	10,676	6,288
Tunisia	22,991	25,373	25,173
Turkey	30,378	27,889	35,971
Ukraine	529	4,385	2,796
UAE	4,542	612	6,884
Subject sources	238,086	245,786	280,270
Nonsubject sources	42,686	39,733	33,094
All import sources	280,773	285,519	313,364

Table continued on next page.

**Table F-1—Continued**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
U.S. imports from.--			
Argentina	---	1,083	2,599
Colombia	9,156	10,594	9,846
Egypt	---	---	372
Indonesia	213	4,416	5,380
Italy	7,379	7,382	10,984
Malaysia	23,838	30,263	27,129
Netherlands	1,907	1,300	1,800
Saudi Arabia	2,575	7,698	1,422
South Africa	7,023	9,063	7,490
Spain	9,437	7,703	16,481
Taiwan	1,014	5,092	3,056
Tunisia	7,683	10,967	9,900
Turkey	10,580	12,603	14,311
Ukraine	187	1,836	987
UAE	1,891	250	2,359
Subject sources	82,884	110,251	114,115
Nonsubject sources	15,452	19,224	14,813
All import sources	98,336	129,475	128,927

Table continued on next page.

**Table F-1—Continued**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
U.S. imports from.--			
Argentina	---	493	424
Colombia	344	437	413
Egypt	---	---	384
Indonesia	336	427	387
Italy	348	498	452
Malaysia	337	442	400
Netherlands	609	657	623
Saudi Arabia	333	414	390
South Africa	344	445	418
Spain	355	486	394
Taiwan	392	477	486
Tunisia	334	432	393
Turkey	348	452	398
Ukraine	353	419	353
UAE	416	408	343
Subject sources	348	449	407
Nonsubject sources	362	484	448
All import sources	350	453	411

Table continued on next page.

**Table F-1—Continued**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of quantity (percent)</b>		
U.S. imports from.--			
Argentina	---	0.8	2.0
Colombia	9.5	8.5	7.6
Egypt	---	---	0.3
Indonesia	0.2	3.6	4.4
Italy	7.6	5.2	7.8
Malaysia	25.2	24.0	21.6
Netherlands	1.1	0.7	0.9
Saudi Arabia	2.8	6.5	1.2
South Africa	7.3	7.1	5.7
Spain	9.5	5.6	13.3
Taiwan	0.9	3.7	2.0
Tunisia	8.2	8.9	8.0
Turkey	10.8	9.8	11.5
Ukraine	0.2	1.5	0.9
UAE	1.6	0.2	2.2
Subject sources	84.8	86.1	89.4
Nonsubject sources	15.2	13.9	10.6
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table F-1—Continued**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of value (percent)</b>		
U.S. imports from.--			
Argentina	---	0.8	2.0
Colombia	9.3	8.2	7.6
Egypt	---	---	0.3
Indonesia	0.2	3.4	4.2
Italy	7.5	5.7	8.5
Malaysia	24.2	23.4	21.0
Netherlands	1.9	1.0	1.4
Saudi Arabia	2.6	5.9	1.1
South Africa	7.1	7.0	5.8
Spain	9.6	5.9	12.8
Taiwan	1.0	3.9	2.4
Tunisia	7.8	8.5	7.7
Turkey	10.8	9.7	11.1
Ukraine	0.2	1.4	0.8
UAE	1.9	0.2	1.8
Subject sources	84.3	85.2	88.5
Nonsubject sources	15.7	14.8	11.5
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table F-1—Continued**  
**PC strand: U.S. imports, uncovered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Ratio to U.S. production</b>		
U.S. imports from.--			
Argentina	---	0.3	1.0
Colombia	3.9	3.4	3.7
Egypt	---	---	0.2
Indonesia	0.1	1.5	2.2
Italy	3.1	2.1	3.8
Malaysia	10.4	9.6	10.6
Netherlands	0.5	0.3	0.5
Saudi Arabia	1.1	2.6	0.6
South Africa	3.0	2.9	2.8
Spain	3.9	2.2	6.5
Taiwan	0.4	1.5	1.0
Tunisia	3.4	3.6	3.9
Turkey	4.5	3.9	5.6
Ukraine	0.1	0.6	0.4
UAE	0.7	0.1	1.1
Subject sources	34.9	34.5	43.9
Nonsubject sources	6.3	5.6	5.2
All import sources	41.2	40.1	49.0

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.



**Table F-2**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Quantity (1,000 pounds)</b>		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	2
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	2
Nonsubject sources	23	17	---
All import sources	23	17	2

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**Table F-2—Continued**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	20
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	20
Nonsubject sources	156	120	---
All import sources	156	120	20

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**Table F-2—Continued**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	8,916
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	8,916
Nonsubject sources	6,729	7,038	---
All import sources	6,729	7,038	8,916

Table continued on next page.

**Table F-2—Continued**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of quantity (percent)</b>		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	100.0
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	100.0
Nonsubject sources	100.0	100.0	---
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table F-2—Continued**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Share of value (percent)</b>		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	100.0
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	100.0
Nonsubject sources	100.0	100.0	---
All import sources	100.0	100.0	100.0

Table continued on next page.

**Table F-2—Continued**  
**PC strand: U.S. imports, covered by source, 2017-19**

Item	Calendar year		
	2017	2018	2019
	<b>Ratio to U.S. production</b>		
U.S. imports from.--			
Argentina	---	---	---
Colombia	---	---	---
Egypt	---	---	---
Indonesia	---	---	---
Italy	---	---	---
Malaysia	---	---	---
Netherlands	---	---	---
Saudi Arabia	---	---	---
South Africa	---	---	---
Spain	---	---	0.0
Taiwan	---	---	---
Tunisia	---	---	---
Turkey	---	---	---
Ukraine	---	---	---
UAE	---	---	---
Subject sources	---	---	0.0
Nonsubject sources	0.0	0.0	---
All import sources	0.8	0.3	0.0

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

Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed May 6, 2020.