

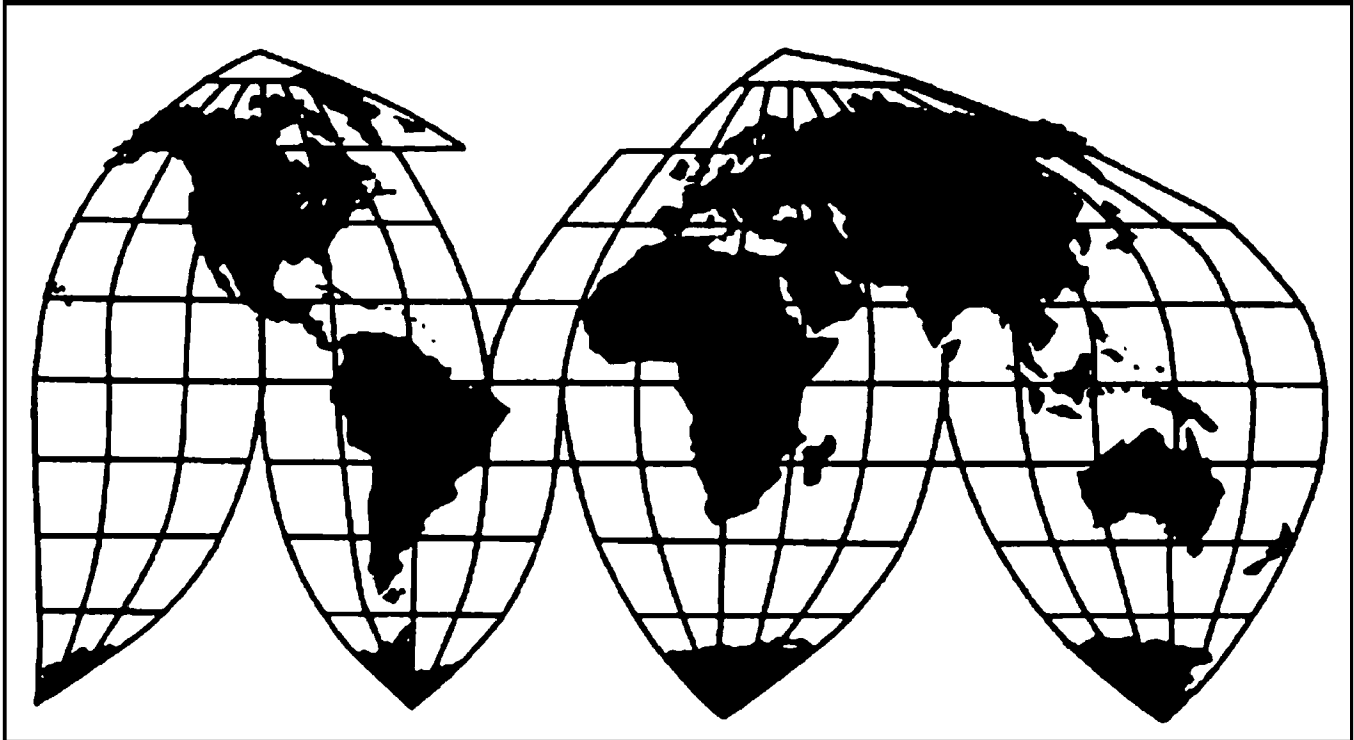
Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the United Arab Emirates

Investigation Nos. 701-TA-646 and 731-TA-1502-1504, 1508-1509, 1512, 1514,
and 1516 (Final)

Publication 5153

January 2021

U.S. International Trade Commission



Washington, DC 20436

U.S. International Trade Commission

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CONTENTS

	Page
Determinations	1
Views of the Commission.....	3
Part I: Introduction	I-1
Background.....	I-1
Statutory criteria	I-3
Organization of report.....	I-4
Market summary.....	I-5
Summary data and data sources.....	I-5
Previous and related investigations.....	I-6
Nature and extent of subsidies and sales at LTFV	I-7
Subsidies	I-7
Sales at LTFV	I-8
The subject merchandise	I-12
Commerce’s scope	I-12
Tariff treatment.....	I-12
The product.....	I-14
Description and applications.....	I-14
Manufacturing processes	I-15
Domestic like product issues.....	I-17
Part II: Conditions of competition in the U.S. market.....	II-1
U.S. market characteristics.....	II-1
Channels of distribution	II-3
Type of end use	II-3
Geographic distribution	II-5
Supply and demand considerations.....	II-7
U.S. supply	II-7
U.S. demand	II-11
Substitutability issues.....	II-15

CONTENTS

	Page
Part II: Conditions of competition in the U.S. market.....	Continued
Lead times	II-16
Factors affecting purchasing decisions.....	II-16
Comparisons of domestic products, subject imports, and nonsubject imports	II-20
Comparison of U.S.-produced and imported PC strand.....	II-23
Elasticity estimates	II-26
U.S. supply elasticity.....	II-26
U.S. demand elasticity	II-27
Substitution elasticity	II-27
Part III: U.S. producers' production, shipments, and employment	III-1
U.S. producers	III-1
U.S. production, capacity, and capacity utilization	III-4
Alternative products.....	III-7
U.S. producers' U.S. shipments and exports.....	III-8
U.S. producers' inventories.....	III-9
U.S. producers' imports and purchases	III-10
U.S. employment, wages, and productivity	III-10
Part IV: U.S. imports, apparent U.S. consumption, and market shares	IV-1
U.S. importers.....	IV-1
U.S. imports.....	IV-2
Critical circumstances.....	IV-11
Negligibility.....	IV-21
Cumulation considerations	IV-24
Fungibility	IV-24
Geographical markets	IV-28
Presence in the market	IV-31
Apparent U.S. consumption	IV-40
U.S. market shares	IV-42

CONTENTS

	Page
Part V: Pricing data	V-1
Factors affecting prices	V-1
Raw material costs	V-1
Transportation costs to the U.S. market	V-3
U.S. inland transportation costs	V-3
Pricing practices	V-4
Pricing methods.....	V-4
Sales terms and discounts	V-5
Price data.....	V-6
Price trends.....	V-16
Price comparisons	V-17
Lost sales and lost revenue	V-19
Part VI: Financial experience of U.S. producers	VI-1
Background.....	VI-1
Operations on PC strand	VI-2
Net sales	VI-11
Cost of goods sold and gross profit or (loss)	VI-13
SG&A expenses and operating income or (loss)	VI-16
All other expenses and net income or (loss).....	VI-17
Capital expenditures and research and development expenses, assets, return on assets..	VI-18
Capital and investment	VI-20
Part VII: Threat considerations and information on nonsubject countries	VII-1
The industry in Argentina	VII-3
Changes in operations	VII-3
Operations on PC strand	VII-4
Alternative products.....	VII-6
Exports.....	VII-6
The industry in Colombia	VII-8

CONTENTS

	Page
Part VII: Threat considerations and information on nonsubject countries..... Continued	
Operations on PC strand	VII-8
Alternative products.....	VII-8
Exports.....	VII-9
The industry in Egypt.....	VII-11
Changes in operations	VII-12
Operations on PC strand	VII-12
Alternative products.....	VII-14
Exports.....	VII-14
The industry in Indonesia.....	VII-17
Changes in operations	VII-18
Operations on PC strand	VII-18
Alternative products.....	VII-20
Exports.....	VII-21
The industry in Italy.....	VII-23
Changes in operations	VII-24
Operations on PC strand	VII-24
Alternative products.....	VII-26
Exports.....	VII-26
The industry in Malaysia	VII-29
Changes in operations	VII-29
Operations on PC strand	VII-30
Alternative products.....	VII-32
Exports.....	VII-32
The industry in Netherlands.....	VII-35
Changes in operations	VII-35
Operations on PC strand	VII-36
Alternative products.....	VII-38

CONTENTS

	Page
Part VII: Threat considerations and information on nonsubject countries..... Continued	
Exports.....	VII-38
The industry in Saudi Arabia	VII-40
Changes in operations	VII-41
Operations on PC strand	VII-41
Alternative products.....	VII-43
Exports.....	VII-43
The industry in South Africa	VII-45
Changes in operations	VII-45
Operations on PC strand	VII-46
Alternative products.....	VII-48
Exports.....	VII-48
The industry in Spain.....	VII-51
Changes in operations	VII-51
Operations on PC strand	VII-52
Alternative products.....	VII-54
Exports.....	VII-54
The industry in Taiwan	VII-56
Changes in operations	VII-56
Operations on PC strand	VII-57
Alternative products.....	VII-59
Exports.....	VII-59
The industry in Tunisia	VII-61
Changes in operations	VII-61
Operations on PC strand	VII-62
Alternative products.....	VII-64
Exports.....	VII-64
The industry in Turkey.....	VII-66

CONTENTS

	Page
Part VII: Threat considerations and information on nonsubject countries..... Continued	
Changes in operations.....	VII-67
Operations on PC strand	VII-67
Alternative products.....	VII-69
Exports.....	VII-70
The industry in Ukraine	VII-72
Changes in operations.....	VII-73
Operations on PC strand	VII-73
Alternative products.....	VII-75
Exports.....	VII-75
The industry in United Arab Emirates.....	VII-78
Changes in operations.....	VII-78
Operations on PC strand	VII-79
Alternative products.....	VII-80
Exports.....	VII-81
Subject countries combined.....	VII-83
U.S. inventories of imported merchandise	VII-86
U.S. importers' outstanding orders.....	VII-89
Antidumping or countervailing duty orders in third-country markets.....	VII-90
Global markets	VII-90

CONTENTS

Page

Appendixes

A. <i>Federal Register</i> notices.....	A-1
B. List of staff conference witnesses.....	B-1
C. Summary data	C-1
D. U.S. shipments by application type.....	D-1
E. Subject country comparisons regarding interchangeability.....	E-1

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-1502-1504, 1508-1509, 1512, 1514, and 1516 (Final)
Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, Netherlands, Saudi
Arabia, Taiwan, Turkey, and the United Arab Emirates

DETERMINATIONS

On the basis of the record¹ developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of prestressed concrete steel wire strand (“PC strand”) from Argentina, Colombia, Egypt, Netherlands, Saudi Arabia, Taiwan, Turkey, and the United Arab Emirates, provided for in subheading 7312.10.30 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and to be subsidized by the government of Turkey.²

BACKGROUND

The Commission instituted these investigations effective April 16, 2020, following receipt of petitions filed with the Commission and Commerce by Insteel Wire Products Company, Mount Airy, North Carolina, Sumiden Wire Products Corporation, Dickson, Tennessee, and Wire Mesh Corporation, Houston, Texas. The final phase of the investigations was scheduled by the Commission following notification of a preliminary determinations by Commerce that imports of PC strand from Turkey were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and that imports of PC strand from Argentina, Colombia, Egypt, Netherlands, Saudi Arabia, Taiwan, Turkey, and the United Arab Emirates were being sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of the Commission’s investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice

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

² The Commission also finds that imports subject to Commerce’s affirmative critical circumstances determinations are not likely to undermine seriously the remedial effect of the antidumping duty orders on PC strand from Colombia, Egypt, Netherlands, and Turkey.

in the *Federal Register* on October 8, 2020 (85 FR 63576). In light of the restrictions on access to the Commission building due to the COVID–19 pandemic, the Commission conducted its hearing through written testimony and video conference on December 10, 2020. All persons who requested the opportunity were permitted to participate.

Views of the Commission

Based on the record in the final phase of these investigations, we determine that an industry in the United States is materially injured by reason of imports of prestressed concrete steel wire strand (“PC strand”) from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the United Arab Emirates (“UAE”) found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value, and to be subsidized by the Government of Turkey. We also find that critical circumstances do not exist with respect to imports of the subject merchandise from Colombia, Egypt, the Netherlands, and Turkey subject to Commerce’s affirmative critical circumstances determinations.

I. Background

Petitioners Insteel Wire Products Company (“Insteel”), Sumiden Wire Products Corporation (“Sumiden”), and Wire Mesh Corporation (“WMC”), domestic producers of PC strand, filed antidumping and countervailing duty petitions on imports of PC strand from 15 subject countries on April 16, 2020. The investigation schedules became staggered in September 2020, when Commerce postponed its preliminary antidumping duty determinations regarding PC strand from Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Ukraine (collectively, the “trailing” investigations), but not its preliminary determinations regarding PC strand from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the UAE (collectively, the “leading” investigations).¹ Commerce issued its preliminary determinations in the trailing investigations later in September 2020 and its final determinations in the leading investigations on December 11, 2020.² As a result of this staggering, the Commission must make earlier final determinations in the antidumping duty investigations on PC strand from Argentina, Colombia, Egypt, Netherlands, Saudi Arabia, Taiwan, Turkey, and the UAE, and on the countervailing duty investigation on PC strand from Turkey, than in the trailing investigations. Pursuant to the statutory provision on staggered investigations, the record for each of these investigations will be the same except that prior to the Commission’s determinations on PC strand from Indonesia, Italy, Malaysia, South Africa,

¹ Prestressed Concrete Steel Wire Strand from Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Ukraine: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations, 85 Fed. Reg. 55413 (Sept. 8, 2020).

² Prestressed Concrete Steel Wire Strand From Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, the Republic of Turkey, and the United Arab Emirates: Final Affirmative Determinations of Sales at Less Than Fair Value and Final Affirmative Critical Circumstances Determinations, in Part, 85 Fed. Reg. 80001 (Dec. 11, 2020) (“Commerce 8-Country AD Final”); Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination, 85 Fed. Reg. 80005 (Dec. 11, 2020) (“Commerce CVD Final”).

Spain, Tunisia, and Ukraine, the Commission shall include the final Commerce dumping determinations and the parties' final comments concerning those determinations in the record.³

Petitioners filed written testimony, appeared at the hearing accompanied by counsel, and submitted prehearing and posthearing briefs and final comments.⁴ Respondents that participated actively in the final phase investigations included Concrete Reinforcing Products ("CRP"), also known as A.G. Royce Metal Marketing LLC, a U.S. importer of subject merchandise, which filed prehearing and posthearing briefs; Tata International Metals (Americas Ltd.) ("TIMAL"), a U.S. importer of subject merchandise, which filed a posthearing brief; the Government of Ukraine ("GOU"), which filed written testimony, prehearing and posthearing briefs, final comments, and participated in the hearing; and the Government of Indonesia ("GOI"), which filed written testimony, a posthearing brief, and participated in the hearing.

U.S. industry data are based on the questionnaire responses from five domestic producers that accounted for all or nearly all domestic production of PC strand in 2019.⁵ U.S. import data are based on official Commerce import statistics and from questionnaire responses of 12 U.S. importers of PC strand, accounting for 87.4 percent of total subject imports and 90.1 percent of imports of PC strand from all sources in 2019.⁶ Data concerning the subject industries are based on responses to the final phase questionnaires from 18 foreign producers

³ See 19 U.S.C. 1677(7)(G)(iii). Commerce is currently scheduled to issue its final determinations in the trailing investigations within 135 days after publication of the preliminary determinations, or March 22, 2021. See 85 Fed. Reg. 73674, 73676, 73679, 73681, 73683, 74685, and 73688 (Nov. 19, 2020) (respectively, preliminary Commerce determinations on PC strand from Malaysia, Indonesia, Italy, South Africa, Spain, Tunisia, and Ukraine).

⁴ In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing through written witness testimony and teleconference held on Dec. 10, 2020, as set forth in procedures provided to the parties on Dec. 2, 2020. *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: Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations*, 85 Fed. Reg. 63576 (Oct. 8, 2020).

⁵ Confidential Staff Report, INV-SS-149 (Dec. 23, 2020), as amended by memoranda INV-TT-001 and INV-TT-002 (Jan. 4, 2021) ("CR") and Public Report, USITC Pub. 5153 (Jan. 2021) ("PR"), at III-1 and Table III-1.

⁶ CR/PR at I-6. In particular, questionnaire data account for the following percentages of subject imports from each individual subject country in 2019: 63.6 percent from Argentina, 102.9 percent from Colombia, 97.8 percent from Egypt, 99.9 percent from Indonesia, 92.4 percent from Italy, 101.5 percent from Malaysia, 0 percent from Netherlands, 81.9 percent from Saudi Arabia, 90.8 percent from South Africa, 18.5 percent from Spain, 108.3 percent from Taiwan, 111.3 percent from Tunisia, 118.4 percent from Turkey, 103.7 percent from Ukraine, and 44.6 percent from the UAE. CR/PR at IV-1.

in 12 subject countries.⁷ The period of investigation (“POI”) is January 2017 through September 2020.

⁷ CR/PR at I-6. In particular, in the final phase the Commission received questionnaire responses from:

- One producer of subject merchandise in Argentina, which accounted for *** percent of exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-3.
- Three producers of subject merchandise in Indonesia, accounting for *** percent of exports of subject merchandise to the United States from that country in 2019; two of the three producers reported that they accounted for an estimated overall *** percent of production of subject merchandise in Indonesia in 2019. CR/PR at VII-17.
- Two producers of subject merchandise in Italy. When combined with data provided in the preliminary phase by an additional producer, coverage accounts for *** exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-23.
- Two producers of subject merchandise in Malaysia, accounting for *** percent of exports to the United States and an estimated *** percent of production of subject merchandise in that country in 2019. CR/PR at VII-29.
- One producer of subject merchandise in the Netherlands, which accounted for *** exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-35.
- One producer of subject merchandise in South Africa, which accounted for *** exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-45.
- One producer of subject merchandise in Spain, which accounted for *** exports to the United States and an estimated *** percent of production of subject merchandise in that country in 2019. CR/PR at VII-51.
- One producer of subject merchandise in Taiwan, which accounted for *** exports to the United States and an estimated *** percent of production of subject merchandise in that country in 2019. CR/PR at VII-56.
- One producer of subject merchandise in Tunisia, which accounted for *** exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-61.
- Three producers of subject merchandise in Turkey, which accounted for *** exports to the United States and an estimated *** percent of production of subject merchandise in that country in 2019. CR/PR at VII-66.
- One producer of subject merchandise in Ukraine, which accounted for *** exports to the United States and *** production of subject merchandise in that country in 2019. CR/PR at VII-72.
- One producer of subject merchandise in the UAE, which estimated it accounted for *** percent of production of subject merchandise in that country in 2019. CR/PR at VII-78.
- No producers in Colombia, Egypt, or Saudi Arabia responded to the final phase questionnaire, although one Egyptian and two Saudi producers responded to the preliminary phase questionnaire. CR/PR at VII-8, VII-11, VII-40. The Commission report includes preliminary phase data provided by these three firms. *Id.* at I-6 n.6.

II. Domestic Like Product

A. In General

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of subject merchandise, the Commission first defines the “domestic like product” and the “industry.”⁸ Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”⁹ 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.”¹⁰

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.¹¹ 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.”¹² The Commission then defines the domestic like product in light of the imported articles Commerce has identified.¹³ The decision regarding the appropriate domestic like product in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and

⁸ 19 U.S.C. § 1677(4)(A).

⁹ 19 U.S.C. § 1677(4)(A).

¹⁰ 19 U.S.C. § 1677(10).

¹¹ 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).

¹² *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. Circ. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

¹³ *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 Co. v. United States*, 747 F. Supp. 744, 748–52 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (affirming the Commission’s determination defining six like products in investigations where Commerce found five classes or kinds).

uses” on a case-by-case basis.¹⁴ No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.¹⁵ The Commission looks for clear dividing lines among possible like products and disregards minor variations.¹⁶

B. Product Description

Commerce defined the scope of the imported merchandise under investigation 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 posttensioned) 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./ft² 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.¹⁷

¹⁴ See, e.g., *Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Department of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Torrington Co. v. United States*, 747 F. Supp. 744, 749 n.3 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991) (“every like product determination ‘must be made on the particular record at issue’ and the ‘unique facts of each case’”). The Commission generally considers a number of factors, including the following: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production processes, and production employees; and, where appropriate, (6) price. See *Nippon*, 19 CIT at 455 n.4; *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996).

¹⁵ See, e.g., S. Rep. No. 96-249 at 90-91 (1979).

¹⁶ *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.”).

¹⁷ E.g., Commerce 8-Country AD Final, 85 Fed. Reg. at 80001; Commerce CVD Final, 85 Fed. Reg. at 80005.

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

PC strand may be used in pre-tensioned or post-tensioned concrete structures. In pre-tensioned prestressed concrete, PC strand is bonded within the concrete to create the hold in compression. Pre-tensioned concrete components may be used in balconies, lintels, floor slabs, beams, or foundation piles. In post-tensioned prestressed concrete, 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. Post-tensioned concrete components may be used 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.¹⁹

C. Arguments of the Parties

Petitioners' Arguments. Petitioners argue that the Commission should find a single domestic like product, consisting of PC strand, that is coextensive with the scope.²⁰ They note that no party has sought a different domestic like product definition.²¹ They emphasize that all PC strand has the same basic physical characteristics regardless of whether it is used in pre-tensioned or post-tensioned applications.²² Petitioners maintain that there is a single end use for PC strand that remains the same whether the PC strand is applied in a pre-tension or post-tension method.²³

Petitioners assert that domestically produced PC strand is generally sold directly to end users.²⁴ Moreover, most equipment used to produce PC strand is not also used to produce

¹⁸ CR/PR at I-14.

¹⁹ CR/PR at I-14-15.

²⁰ Petitioners' Prehearing Br. at 3.

²¹ Petitioners' Prehearing Br. at 3-4.

²² Petitioners' Prehearing Br. at 4-5; Hearing Transcript ("Tr.") at 23 (H.O. Woltz III).

²³ Petitioners' Prehearing Br. at 5.

²⁴ Petitioners' Prehearing Br. at 6.

other products.²⁵ According to Petitioners, domestic producers and customers perceive PC strand as a single discrete product that does not have suitable substitutes.²⁶

Respondents' Arguments. No respondent raised domestic like product arguments.

D. Domestic Like Product Analysis

In its preliminary determinations the Commission defined a single domestic like product consisting of PC strand coextensive with the scope.²⁷ The issue was not disputed. The Commission found 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 the product is almost entirely sold to end users. In addition, PC strand is generally interchangeable and is perceived to be a discrete product.²⁸

As discussed above, no party contests the Commission's definition in the preliminary determinations that there is a single domestic like product coextensive with the scope. The record in the final phase investigations does not contain any information calling into question the findings the Commission made in the preliminary phase.²⁹ Accordingly, we define a single domestic like product consisting of PC strand coextensive with the scope.

III. Domestic Industry

The domestic industry is defined as the domestic "producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product."³⁰ 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.

Petitioners agree with the Commission's definition of the domestic industry as all U.S. producers of PC strand in the preliminary determinations.³¹ No respondent raised domestic industry arguments. There are no issues arising under the related parties provision in these

²⁵ Petitioners' Prehearing Br. at 7.

²⁶ Petitioners' Prehearing Br. at 7.

²⁷ 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, Inv. Nos. 701-TA-646 and 731-TA-1502-1516 (Preliminary), USITC Pub. 5062 at 9 (June 2020) ("Preliminary Determinations").

²⁸ Preliminary Determinations, USITC Pub. 5062 at 9-10.

²⁹ See *generally* CR/PR at I-14-17.

³⁰ 19 U.S.C. § 1677(4)(A).

³¹ Petitioners' Prehearing Br. at 9.

final phase investigations.³² Accordingly, in light of our definition of domestic like product, we define the domestic industry as all domestic producers of PC strand.

IV. Negligible Imports

Section 771(24) of the Tariff Act, which defines “negligibility,” provides that imports from a subject country that are less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or self-initiation, as the case may be, shall be deemed negligible.³³ 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 below the 3 percent threshold 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.³⁴ In the case of countervailing duty investigations involving developing countries (as designated by the United States Trade Representative), the statute indicates that the negligibility limits are 4 percent and 9 percent, rather than 3 percent and 7 percent.³⁵

During the 12-month period preceding filing of the petitions (April 2019 through March 2020), subject imports from two of the eight subject countries involved in the leading investigations exceeded the three percent statutory negligibility threshold.³⁶ Dumped subject imports from Colombia were *** percent of total imports and dumped and subsidized subject imports from Turkey were *** percent of total imports during this 12-month period.³⁷ We therefore find that subject imports from Colombia and Turkey are not negligible.

Imports from the remaining six subject countries involved in the leading investigations (Argentina, Egypt, the Netherlands, Saudi Arabia, Taiwan, and the UAE) are each below the

³² No domestic producer imported (or purchased) subject merchandise during the POI, or is related to an importer or exporter of subject merchandise. One domestic producer, ***, is affiliated with a ***, through ***. CR/PR at Table III-2. *** is not a related party because *** did not ***. *** Foreign Producer Questionnaire Response, EDIS Doc. 721452 (Oct. 8, 2020), Response to Question II-8.

³³ 19 U.S.C. § 1677(24)(A)(i).

³⁴ 19 U.S.C. § 1677(24)(A)(ii).

³⁵ 19 U.S.C. § 1677(24)(B).

³⁶ The statute directs the Commission, after it has made a preliminary determination in an antidumping or countervailing duty investigation, to again address negligibility when it makes its final determination. 19 U.S.C. §§ 1671d(b)(1)(B), 1673d(b)(1)(B). Consequently, in this opinion we make negligibility determinations for only those investigations on which we are making final determinations – in other words, the leading investigations.

³⁷ CR/PR at Table IV-8.

three percent statutory threshold.³⁸ However, pursuant to the statute, imports from all countries as to which investigations were initiated on the same day that do not meet the three percent threshold may be aggregated for purposes of negligibility analysis.³⁹ There are seven subject countries currently eligible for aggregation under this provision: six from the leading investigations (Argentina, Egypt, the Netherlands, Saudi Arabia, Taiwan, and the UAE) and one from the trailing investigations (Ukraine). During the 12-month negligibility period, subject imports from these seven subject countries constituted *** percent of the volume of total PC strand imports.⁴⁰ Because this exceeds the aggregate statutory negligibility threshold of seven percent, we also find that subject imports from Argentina, Egypt, the Netherlands, Saudi Arabia, Taiwan, and the UAE are not negligible.

V. Cumulation

For purposes of evaluating the volume and effects for a determination 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 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

³⁸ CR/PR at Table IV-8. Individual percentages are *** percent for Egypt, *** percent for the Netherlands, Ukraine, and UAE, *** percent for Argentina, *** percent for Taiwan, and *** percent for Saudi Arabia. *Id.* We observe that the latter figure is not especially close to the 3 percent threshold. Moreover, monthly import volumes from Saudi Arabia during the 12-month negligibility period were intermittent and showed large fluctuations. CR/PR at Table IV-11.

³⁹ 19 U.S.C. § 1677(24)(A)(ii).

⁴⁰ CR/PR at Table IV-8.

(4) whether the subject imports are simultaneously present in the market.⁴¹

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.⁴² Only a “reasonable overlap” of competition is required.⁴³

Petitioners’ Arguments. Petitioners urge the Commission to cumulate subject imports from all 15 subject countries for purposes of its material injury analysis as it did in the preliminary determinations. They argue that PC strand imports from subject sources are fungible products that are produced to standard industry specifications and compete against one another and the domestic product. Petitioners emphasize that all U.S. producers found imports from all subject countries to be always interchangeable with domestic PC strand, while a majority of responding importers and purchasers found subject imports from each subject country to be always or frequently interchangeable. Additionally, Petitioners assert that importers often sell imported PC strand to customers without differentiating or identifying the source country.⁴⁴

Respondents’ Arguments. No respondent argues that the Commission should not cumulate subject imports for material injury analysis because of a lack of reasonable overlap of competition.⁴⁵

⁴¹ See *Certain Cast-Iron Pipe Fittings from Brazil, the Republic of Korea, and Taiwan*, Inv. Nos. 731-TA-278-280 (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).

⁴² See, e.g., *Wieland Werke, AG v. United States*, 718 F. Supp. 50 (Ct. Int’l Trade 1989).

⁴³ 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, S.A. v. United States*, 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.”)).

⁴⁴ Petitioners’ Prehearing Br. at 14. Witness testimony from purchasers of PC strand supports this assertion. *See id.* at 14-15.

⁴⁵ GOU argues that subject imports from Ukraine should not be cumulated because they are negligible. GOU Prehearing Br. at 7. Its argument appears to pertain to a scenario in which the Commission were to analyze threat of material injury. We need not reach that issue in these investigations, and the discussion here concerns cumulation for material injury analysis. While the Commission has discretion in analyzing threat of material injury whether to cumulate, in analyzing material injury the statute requires the Commission to cumulate when the statutory factors are met. 19 U.S.C. § 1677(7)(G)(i).

In its posthearing brief GOU cites Article 3.3 of the WTO Antidumping Agreement for the proposition that the agreement requires that each individual country be found not negligible in order for (Continued...)

The statutory threshold for cumulation is satisfied in these investigations because Petitioners filed the antidumping and countervailing duty petitions with respect to all 15 subject countries on the same day, April 16, 2020.⁴⁶

Fungibility. All responding U.S. producers and the majority of U.S. purchasers reported that domestically produced PC strand is always interchangeable with PC strand produced in each subject country. At least half of responding U.S. importers reported that domestically produced PC strand was always or frequently interchangeable with PC strand from each subject country.⁴⁷ In all comparisons between imports from different subject countries, all U.S. producers and a majority of responding purchasers reported that the products were always interchangeable; importer responses, which were often limited, were more mixed.⁴⁸ In comparisons between the domestic product and imports from each subject source concerning 17 purchasing factors, a majority or plurality of the responding purchasers found the domestic product and the subject imports comparable with respect to every factor except price.⁴⁹

Available data also show overlap in end uses. A substantial proportion of domestic producers' U.S. shipments in 2019 (***) percent) and a majority of U.S. shipments for that year from each subject country for which data were reported were for post-tension applications.⁵⁰

Channels of Distribution. During the POI, almost all shipments of the domestic like product were to end users. All subject imports from 12 of the subject countries, and a majority of subject imports from *** were sold to end users; no data were reported on channels of distribution for subject imports from ***.⁵¹

Geographic Overlap. U.S. producers reported shipments to all geographic regions in the United States during the POI.⁵² While imports from each subject country for which data were provided had some variations in geographic presence, in each U.S. region there were multiple

it to be cumulated with other countries. GOU Posthearing Br. at 5-6. We are governed by U.S. law, which does not provide an exception for cumulating subject imports from Ukraine for purposes of these determinations.

⁴⁶ None of the statutory exceptions to cumulation apply. We observe that these investigations involve preliminary or final dumping findings regarding PC strand from all 15 subject countries and subsidy findings regarding PC strand from one subject country, Turkey. Consequently, any decision to cumulate imports from all subject sources in these investigations will involve "cross-cumulat[ing]" dumped imports with subsidized imports. We have previously explained why we are continuing our longstanding practice of cross-cumulat[ing]. See *Polyethylene Terephthalate (PET) Resin from Canada, China, India, and Oman*, Inv. Nos. 701-TA-531-532 and 731-TA-1270-1273 (Final), USITC Pub. 4604 at 9-11 (Apr. 2016).

⁴⁷ CR/PR at Table II-12.

⁴⁸ CR/PR at Table E-1.

⁴⁹ CR/PR at Table II-11.

⁵⁰ CR/PR at Table IV-9. No data were reported for subject imports from ***. *Id.*

⁵¹ CR/PR at II-3 & n.3.

⁵² CR/PR at Table II-4.

subject suppliers, and imports from 12 of the 15 subject countries were sold in the Southeast and Central Southwest regions.⁵³

Simultaneous Presence in Market. Questionnaire data show that the domestic like product was present in the U.S. market throughout the POI.⁵⁴ Official U.S. import statistics indicate that imports of PC strand from two subject sources, Malaysia and Turkey, were present in each month of the POI.⁵⁵ Imports from Colombia, Italy, and Spain were each present for 44 months of the 45-month period. Subject imports from the Netherlands and Tunisia were present for 36 months of the period, those from South Africa for 34 months, those from Taiwan for 33 months, those from Ukraine for 26 months, those from Saudi Arabia for 25 months, those from Argentina for 12 months, those from the UAE for 11 months, and those from Egypt for seven months.⁵⁶

Conclusion. The petitions were filed on the same day, thereby satisfying the threshold requirement for cumulation. The record indicates that subject imports from each subject country are fungible with the domestic like product and with each other, and that subject imports from each subject country and the domestic like product are sold in the same channels of distribution. The record also indicates an overlap among subject sources and the domestic like product in terms of geographic markets and simultaneous presence in the U.S. market. In light of the foregoing, we find that there is a reasonable overlap of competition between the domestic like product and imports from each subject country and between imports from each subject country.

Accordingly, for purposes of our determinations on subject imports from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the UAE, we analyze imports from these subject countries on a cumulated basis with each other and with imports of PC strand from Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Ukraine for our analysis of whether the domestic industry is materially injured by reason of subject imports.

VI. Material Injury by Reason of Subject Imports

Based on the record in the final phase of this investigation, we find that an industry in the United States is materially injured by reason of subject imports from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the UAE.

A. Legal Standards

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or

⁵³ CR/PR at Table II-4.

⁵⁴ CR/PR at Table III-5.

⁵⁵ CR/PR at IV-31, Table IV-11.

⁵⁶ CR/PR at IV-31, Table IV-11.

threatened with material injury by reason of the imports under investigation.⁵⁷ 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.⁵⁸ The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”⁵⁹ In assessing whether the domestic industry is materially injured by reason of subject imports, we consider all relevant economic factors that bear on the state of the industry in the United States.⁶⁰ 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.”⁶¹

Although the statute requires the Commission to determine whether the domestic industry is “materially injured or threatened with material injury by reason of” unfairly traded imports,⁶² 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.⁶³ In identifying a causal link, if any, between subject imports and material injury to the domestic industry, the Commission examines the facts of record that relate to the significance of the volume and price effects of the subject imports and any impact of those imports on the condition of the domestic industry. This evaluation under the “by reason of” standard must ensure that subject imports 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.⁶⁴

⁵⁷ 19 U.S.C. §§ 1671d(b), 1673d(b).

⁵⁸ 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).

⁵⁹ 19 U.S.C. § 1677(7)(A).

⁶⁰ 19 U.S.C. § 1677(7)(C)(iii).

⁶¹ 19 U.S.C. § 1677(7)(C)(iii).

⁶² 19 U.S.C. §§ 1671d(b), 1673d(b).

⁶³ *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).

⁶⁴ 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).

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.⁶⁵ In performing its examination, however, the Commission need not isolate the injury caused by other factors from injury caused by unfairly traded imports.⁶⁶ Nor does the “by reason of” standard require that unfairly traded imports be the “principal” cause of injury or contemplate that injury from unfairly traded imports be weighed against other factors, such as nonsubject imports, which may be contributing to overall injury to an industry.⁶⁷ It is clear

⁶⁵ 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.

⁶⁶ 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 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.”).

⁶⁷ S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

that the existence of injury caused by other factors does not compel a negative determination.⁶⁸

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.”⁶⁹ 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.”⁷⁰ The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”⁷¹

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.⁷² Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.⁷³

B. Conditions of Competition and the Business Cycle

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

⁶⁸ 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.”).

⁶⁹ *Mittal Steel*, 542 F.3d at 876 &78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.

⁷⁰ *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.

⁷¹ *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.”).

⁷² We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

⁷³ *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.”).

1. Demand Considerations

The demand for PC strand is driven by demand for downstream products used in construction, including infrastructure projects, commercial and institutional construction, large housing projects, and single-family housing.⁷⁴ Substantial quantities of the domestic like product and cumulated subject imports are used in both pre- and post-tension applications, although a greater proportion of the domestic like product is used in pre-tension applications and a greater proportion of the cumulated subject imports is used in post-tension applications.⁷⁵

Private residential construction, private nonresidential construction, and public construction all increased between January 2017 and September 2020.⁷⁶ A minority of U.S. producers (two of five) and importers (***) but a majority of purchasers (11 of 18) reported that the PC strand market was subject to business cycles. Specifically, firms reported that the PC strand market is affected by housing starts, interest rates, and weather conditions.⁷⁷

Most responding U.S. producers (four of five) and purchasers (three of five) reported that demand for PC strand increased since January 1, 2017, while a plurality of importers (***) reported that demand fluctuated.⁷⁸ Petitioners maintain that the COVID-19 pandemic did not adversely affect either U.S. demand or their operations.⁷⁹ Apparent U.S. consumption of PC strand, by quantity, fluctuated but increased overall during the POI, rising from *** pounds in 2017 to *** pounds in 2018 and then declining to *** pounds in 2019, a level greater than that of 2017.⁸⁰

2. Supply Considerations

The domestic industry accounted for the largest share of the U.S. PC strand market during the POI. Its share of the quantity of apparent U.S. consumption fluctuated but decreased overall from *** percent in 2017 to *** percent in 2018 and *** percent in 2019, for an overall decline of *** percentage points.⁸¹ The domestic industry's capacity exceeded apparent U.S. consumption from 2017 to 2019.⁸²

⁷⁴ CR/PR at II-12.

⁷⁵ CR/PR at Table IV-9.

⁷⁶ CR/PR at II-12.

⁷⁷ CR/PR at II-13.

⁷⁸ CR/PR at Table II-6.

⁷⁹ Petitioners' Prehearing Br. at 21-22; Tr. at 25 (Woltz), 54-55 (J. Cornelius), and 72 (R. Wagner).

⁸⁰ CR/PR at Table IV-12. Apparent U.S. consumption was higher in interim 2020 at *** pounds compared to interim 2019 at *** pounds. *Id.*

⁸¹ CR/PR at Table IV-13. The domestic industry's market share was higher in interim 2020 at *** percent compared to interim 2019 at *** percent. *Id.*

⁸² Compare CR/PR Table III-5 with CR/PR Table IV-12.

Domestic producers generally remained operational despite the COVID-19 pandemic. Only one firm reported a plant closure since January 1, 2017,⁸³ and one reported a short-term supply constraint.⁸⁴

Subject imports accounted for the second largest share of the U.S. PC strand market during the POI. Cumulated subject import volumes increased during each full year of the POI.⁸⁵ Their share of the quantity of apparent U.S. consumption declined from *** percent in 2017 to *** percent in 2018 and then increased to *** percent in 2019, a level higher than that of 2017, and an overall increase of ***.⁸⁶

Nonsubject imports accounted for the smallest share of the U.S. PC strand market during the POI. Nonsubject imports' market share decreased from *** percent in 2017 to *** percent in 2018 and *** percent in 2019, for an overall decline of ***.⁸⁷ Portugal was the largest source of nonsubject imports, and accounted for the predominant proportion of nonsubject imports in 2019.⁸⁸ PC strand from Brazil, China, India, Japan, Korea, Mexico, and Thailand is subject to antidumping and/or countervailing duty orders; the Commission is currently conducting five-year reviews concerning the orders on PC strand from China.⁸⁹

3. Substitutability and Other Conditions

We find that there is a moderate-to-high degree of substitutability between domestically produced PC strand and cumulated subject imports.⁹⁰ Whether domestically produced or imported, PC strand generally meets certain specifications such as mill certification requirements or the ASTM A416 specification.⁹¹ All purchasers reported that imports from each subject country always or usually met minimum quality specifications.⁹² No purchaser reported that any domestic or foreign supplier had failed in its attempt to qualify PC strand or had lost its approved status since 2017.⁹³

⁸³ CR/PR at Table IV-8.

⁸⁴ CR/PR at II-11.

⁸⁵ CR/PR at Table IV-12. The quantity of subject imports was lower in interim 2020 compared to interim 2019. *Id.*

⁸⁶ CR/PR at Table IV-13. Subject imports' market share was lower in interim 2020 (*** percent) than in interim 2019 (*** percent). *Id.*

⁸⁷ CR/PR at Tables IV-12 and IV-13. The market share of nonsubject imports was higher in interim 2020 (*** percent) than in interim 2019 (*** percent). CR/PR at Table IV-13.

⁸⁸ CR/PR at II-10.

⁸⁹ CR/PR at Table I-1; Prestressed Concrete Steel Wire Strand from China: Institution of Five-Year Reviews, 85 Fed. Reg. 54401 (Sept. 1, 2020).

⁹⁰ See CR/PR at II-15.

⁹¹ See Tr. at 33 (Wagner); see also CR/PR at II-18.

⁹² CR/PR at Table II-13.

⁹³ CR/PR at II-18.

As discussed above, all responding U.S. producers and the majority of U.S. purchasers reported that domestically produced PC strand is always interchangeable with PC strand produced in each subject country. At least half of responding U.S. importers reported that domestically produced PC strand was always or frequently interchangeable with PC strand from each subject country.⁹⁴ In all comparisons between imports from different subject countries, all U.S. producers and a majority of responding purchasers reported that the products were always interchangeable; importer responses, which were often limited, were more mixed.⁹⁵ In comparisons between the domestic product and imports from each subject source concerning 17 purchasing factors, a majority or plurality of the responding purchasers found the domestic product and the subject imports comparable with respect to every factor except price.⁹⁶

We find that price is an important factor in purchasing decisions for PC strand. Purchasers most frequently named price as the most important factor in purchasing decisions.⁹⁷ Price was the only purchasing factor that every responding purchaser indicated to be very important in purchasing decisions.⁹⁸ A majority of responding purchasers (12 of 18) reported that they usually purchase the lowest-priced product.⁹⁹

Domestically produced PC strand is primarily sold using transaction-by-transaction negotiations; most commercial shipments of domestically produced product involve short-term contracts of 30 to 90 days in duration, with a substantial share being spot market sales.¹⁰⁰ Most sales of subject imports were also made under short-term contracts.¹⁰¹

The main raw material used to produce PC strand is hot-rolled high carbon steel wire rod.¹⁰² Steel wire rod prices fluctuated during the POI, increasing sharply beginning in April 2018, declining from April to December 2019, and increasing thereafter. Overall, raw material costs increased during the POI.¹⁰³ Steel wire rod imports from numerous sources were subject to additional duties during the POI under section 232 of the Trade Expansion Act of 1962 ("section 232 tariffs"),¹⁰⁴ or pursuant to antidumping or countervailing duty orders.¹⁰⁵ Market

⁹⁴ CR/PR at Table II-12.

⁹⁵ CR/PR at Table E-1.

⁹⁶ CR/PR at Table II-11.

⁹⁷ CR/PR at Table II-7.

⁹⁸ CR/PR at Table II-8.

⁹⁹ CR/PR at II-17.

¹⁰⁰ CR/PR at Table V-2.

¹⁰¹ CR/PR at Table V-2.

¹⁰² CR/PR at V-1.

¹⁰³ CR/PR at V-1 and Figure V-1.

¹⁰⁴ 19 U.S.C. § 1862.

¹⁰⁵ CR/PR at I-12-13.

participants generally thought section 232 tariffs caused raw materials costs to increase.¹⁰⁶ Imports of PC strand were not subject to section 232 tariffs.¹⁰⁷

A number of federal transportation projects fall under the requirements of the Buy America Act, which requires that domestic PC strand (along with other domestic inputs) be used in their completion.¹⁰⁸ The data on record indicates that approximately *** percent of reported purchases of domestically produced PC strand were subject to Buy America requirements.¹⁰⁹

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.”¹¹⁰

The volume of cumulated subject imports increased each year from 2017 to 2019. It rose from 238.1 million pounds in 2017 to 245.8 million pounds in 2018 and 290.3 million pounds in 2019, increasing by 17.7 percent from 2017 to 2019.¹¹¹

The market share of cumulated subject imports also increased from 2017 to 2019. Cumulated subject imports’ share of the quantity of apparent U.S. consumption was *** percent in 2017, *** percent in 2018, and *** percent in 2019.¹¹²

¹⁰⁶ CR/PR at V-2.

¹⁰⁷ CR/PR at I-13.

¹⁰⁸ CR/PR at II-20.

¹⁰⁹ CR/PR at Table II-2.

¹¹⁰ 19 U.S.C. § 1677(7)(C)(i).

¹¹¹ CR/PR at Tables IV-2 and C-1. By contrast, cumulated subject import volume was lower in interim 2020, when it was 178.6 million pounds, than in interim 2019, when it was 224.3 million pounds. *Id.*

Petitioners have requested that we reduce the weight we accord to post-petition information concerning the volume, price effects, and impact of the subject imports on the domestic industry pursuant to 19 U.S.C. § 1677(7)(I). See Petitioners’ Posthearing Br., Exh. 1 at 2-6. We agree that this is appropriate, although not entirely for the reasons that petitioners advocate. Monthly data show an appreciable decline in cumulated subject import volume after July 2020 – the third month after the filing of the petitions – whether compared to prior months or the same months of the prior year. CR/PR at Table IV-11. While third quarter interim 2020 data do not account for the entire interim period, they account for a sufficiently large portion of this period that they call into question the usefulness of interim period data in assessing subject import volume and market share, and consequently the domestic industry’s performance indicators during this period. We have consequently given reduced weight to the interim period data.

¹¹² CR/PR at Table IV-13. Cumulated subject imports’ market share was *** percent in interim 2019 and lower, *** percent, in interim 2020. *Id.*

We find that the volume of the cumulated subject imports and the increase in volume from 2017 to 2019 are significant in both 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 the subject imports, the Commission shall consider whether

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

(II) the effect of imports of such merchandise otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.¹¹³

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 collected quarterly price data on two PC strand products.¹¹⁴ All five U.S. producers and seven importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products and all quarters.¹¹⁵

The pricing data indicate that cumulated subject imports were priced below domestically produced product in 162 of 244 available quarterly price comparisons (or 66.4 percent of such comparisons) from the first quarter of 2017 to the second quarter of 2020.¹¹⁶ The quantity of subject imports in underselling comparisons was 423.1 million pounds, while the quantity in overselling comparisons was 293.0 million pounds. Thus, 59.1 percent of the quantity of subject imports of PC strand was sold during quarters in which the average price of

¹¹³ 19 U.S.C. § 1677(7)(C)(ii).

¹¹⁴ CR/PR at V-6. The pricing products were:

Product 1. – Sales for pre-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete stand. Sales to the pre-tension market; and

Product 2. – Sales for post-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete stand. Sales to the post-tension market. *Id.*

¹¹⁵ CR/PR at V-6. Pricing data 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 cumulated subject imports in 2019. Pricing data were reported for 13 of the 15 subject countries (all but the Netherlands and Spain). See CR/PR at V-6-7; Tables V-3-4.

¹¹⁶ Derived from CR/PR at Tables V-3-4. As indicated in section VI.B. above, because cumulated subject import volumes declined notably during the last three months of the POI, we have accorded reduced weight to certain post-petition data. Accordingly, we have focused our analysis of price effects on data from the first quarter of 2017 through the second quarter of 2020, an interval that does not include this three-month period.

these imports was less than that of the comparable domestic product.^{117 118} Additionally, of the 18 purchasers that responded to the Commission's questionnaires, 11 responded that they had purchased subject imports rather than the domestic like product. Nine of these purchasers reported that subject import prices were lower than those for the domestic like product, and eight of these purchasers reported that price was a primary reason for their decision to purchase subject imports rather than the domestic like product for at least one of the subject countries.¹¹⁹ The quantity of subject imports that these eight purchasers stated they acquired, 131.7 million pounds, is substantial.¹²⁰

The pricing and lost sales data consequently show that cumulated subject imports were recurrently priced lower than the domestic like product. These responses also indicate that the lower prices of the subject imports led them to take sales from the domestic industry, which is consistent with our findings about the substitutability of the domestic like product and the cumulated subject imports and the importance of price in purchasing decisions.¹²¹ Moreover, all of the market share gained by subject imports came directly at the expense of the domestic industry.¹²² In light of these considerations, we find that there has been significant price underselling of the domestic like product by subject imports.

¹¹⁷ *Derived from* CR/PR at Tables V-3-4. For the entire POI, cumulated subject imports were priced below domestically produced product in 167 of 261 available quarterly price comparisons (or 64.0 percent of such instances). The quantity of cumulated subject imports in underselling observations was 437.4 million pounds, or 58.6 percent of the total reported quantity of subject imports in pricing comparisons, while the remaining 309.2 million pounds of cumulated subject imports (41.4 percent) were in quarters with overselling observations. CR/PR at Table V-6.

¹¹⁸ Petitioners argue that these data understate the degree of underselling, and that the Commission should consolidate data for the two pricing products as they are identical products that only differ with respect to tensioning methods employed downstream by purchasers. Petitioners' Prehearing Br. at 43-45. We acknowledge that using the methodology petitioners advocate would show greater underselling by subject imports. See Worksheet, EDIS Doc. 728493 (Dec. 18, 2020) at Table XX-2. We note petitioners' arguments regarding the pricing product definitions, and we further note that the definitions used in these investigations conform to those that the Commission used in prior investigations of this product. See *Prestressed Concrete Steel Wire Strand from China*, Inv. Nos. 701-TA-464 and 731-TA-1160 (Final), USITC Pub. 4162 at 17 (June 2010). Further consideration of petitioners' arguments is unnecessary in light of our finding that, relying on the pricing data in the Commission report, cumulated subject imports significantly undersold the domestically produced product.

¹¹⁹ CR/PR at Table V-7.

¹²⁰ CR/PR at Table V-7. This quantity accounted for *** percent of the aggregate *** billion pounds reported by the 18 purchasers that responded to the Commission's questionnaires, and a majority of their reported purchases of subject imports. *Derived from* CR/PR at Tables V-7 and V-9.

¹²¹ Moreover, petitioners provided witness declarations and contemporaneous email correspondence showing that U.S. producers lost sales of PC strand to subject imports throughout the POI on the basis of price. Petitioners' Prehearing Brief at Exhs. 1-5.

¹²² Cumulated subject imports' share of the quantity of apparent U.S. consumption was *** percent in 2017, *** percent in 2018, and *** percent in 2019. Of the *** percentage points of market (Continued...)

We have also considered whether the subject imports prevented price increases for the domestic like product that otherwise would have occurred. Between 2017 and 2019, the domestic industry's ratio of cost of goods sold ("COGS") to net sales increased by 9.0 percentage points, from 88.1 percent in 2017 to 89.8 percent in 2018 and 97.1 percent in 2019.¹²³ The domestic industry's raw material unit costs, in dollars per short ton, increased by \$76 during this period, from \$290 in 2017 to \$366 in 2018, and remained flat in 2019, whereas total unit COGS increased by \$98 (or 25.3 percent), from \$386 in 2017 to \$461 in 2018 and \$484 in 2019.¹²⁴ By contrast, the domestic industry's net sales average unit value ("AUV") increased by only \$60 (or 13.7 percent) between 2017 and 2019, increasing from \$438 in 2017 to \$514 in 2018, and then decreasing to \$498 in 2019.¹²⁵ 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.¹²⁶ Information in the record indicates several unsuccessful attempts by the domestic industry to raise prices.¹²⁷

The cost-price squeeze occurred at a time when market participants generally perceived demand trends to be favorable,¹²⁸ and apparent U.S. consumption increased by *** percent.¹²⁹ In light of these considerations, we find that the significant and increasing volume of low-priced

share subject imports gained from 2017 to 2019, *** percentage points came at the expense of the domestic industry. CR/PR at Table IV-13.

¹²³ CR/PR at Tables VI-1, C-1. It was 97.4 percent in interim 2019 and 90.4 percent in interim 2020. We acknowledge that the domestic industry's ratio of COGS to net sales improved by 7 percentage points in interim 2020 as compared to interim 2019. *Id.* However, as previously stated we have given reduced weight to interim 2020 data. In any event, the industry's COGS/sales ratio in interim 2020 was less favorable than those from the first full two years of the POI. *Id.*

¹²⁴ CR/PR at Tables VI-1 – VI-2, C-1.

¹²⁵ CR/PR at Tables VI-1 – VI-2.

¹²⁶ Prices for both domestically produced pricing products were higher in either the second or third quarter of 2020 than the first quarter of 2017. CR/PR at Tables V-3-4.

¹²⁷ As previously discussed in Section VI.B.3, sales negotiations in the PC strand market largely proceed on a transaction by transaction basis, typically in a short-term or spot sale. Petitioners provided hearing testimony, affidavits, and documentation in the form of announcements and contemporaneous email correspondence from representatives of the petitioning firms asserting that they attempted to raise their prices to account for their increased raw material costs throughout the POI, which customers reportedly rejected because of subject import competition. *See* Tr. at 23 (Wolz (Insteel)) 30 (Cornelius (Sumiden)), 36 (Wagner (Insteel)); Petitioners' Prehearing Br., Exh. 3 (Wolz decl.), para. 13, Att. 1; Exh. 4 (J. Barrenechea decl. (WMC)), paras. 8, 15-17; and Exh. 5 (Cornelius decl.), paras. 6-7, 24-25, Atts. 1A – 1B.

Petitioners also submitted information that they had to lower their prices in response to subject import competition. *See* Tr. at 24 (Wolz), 30 (Cornelius); Petitioners' Prehearing Br., Exh. 3, paras. 18-23, Atts. 2A – 2C, Exh. 4, paras. 3-7, Atts. 1-4, and Exh. 5, paras. 12-18, Atts. 2A – 2F, 3A – 3C. Only two of 16 responding purchasers, however, reported that U.S. producers had reduced prices to compete with lower-priced subject imports. CR/PR at V-21.

¹²⁸ *See* CR/PR at Table II-1.

¹²⁹ CR/PR at Table IV-12.

cumulated subject imports were a cause of the industry's inability to increase its prices commensurately with costs. We consequently conclude that subject imports prevented price increases by the domestic industry, which otherwise would have occurred, to a significant degree.

On these bases, we therefore find that the cumulated subject imports had significant effects on prices for the domestic like product.

E. Impact of the Subject Imports¹³⁰

Section 771(7)(C)(iii) of the Tariff Act provides that examining the impact of subject imports, the Commission "shall evaluate all relevant economic factors which have a bearing on the state of the industry."¹³¹ 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

¹³⁰ The statute instructs the Commission to consider the "magnitude of the dumping margin" in an antidumping proceeding as part of its consideration of the impact of imports. 19 U.S.C. § 1677(7)(C)(iii)(V). In its final determinations, Commerce found dumping margins of 60.40 percent for imports from Argentina; 86.09 percent for imports from Colombia; 29.72 percent for imports from Egypt; 30.86 percent for imports from the Netherlands; 194.40 percent for imports from Saudi Arabia; 23.89 percent for imports from Taiwan; 53.65 percent for imports from Turkey; and 170.65 percent for imports from UAE. Commerce 8-Country AD Final, 85 Fed. Reg. at 80002. In its preliminary determinations in the trailing investigations, Commerce found dumping margins from 2.96 percent to 72.28 percent for subject imports from Indonesia, Commerce Preliminary Determination – Indonesia, 85 Fed. Reg. 73676 (Nov. 19, 2020); from 3.67 percent to 19.26 percent for subject imports from Italy, Commerce Preliminary Determination – Italy, 85 Fed. Reg. 73679 (Nov. 19, 2020); from 3.70 percent to 18.93 percent to subject imports from Malaysia, Commerce Preliminary Determination – Malaysia, 85 Fed. Reg. 73674 (Nov. 19, 2020); of 59.27 percent for subject imports from South Africa, Commerce Preliminary Determination – South Africa, 85 Fed. Reg. 73681 (Nov. 19, 2020); of 14.75 percent for subject imports from Spain, Commerce Preliminary Determination – Spain, 85 Fed. Reg. 73683 (Nov. 19, 2020); of 32.72 percent for subject imports from Tunisia, Commerce Preliminary Determination – Tunisia, 85 Fed. Reg. 73685 (Nov. 19, 2020); and of 19.32 percent for subject imports from Ukraine. Commerce Preliminary Determination – Ukraine, 85 Fed. Reg. 73688 (Nov. 19, 2020).

We take into account in our analysis the fact that Commerce has made preliminary or final findings that all subject producers from the 15 subject countries we are considering in our cumulative analysis are selling subject imports in the United States at less than fair value. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant price effects of subject imports, described in both the price effects discussion and below, is particularly probative to an assessment of the impact of the subject imports.

¹³¹ 19 U.S.C. § 1677(7)(C)(iii); *see also* SAA at 851 and 885 ("In material injury determinations, the Commission considers, in addition to imports, other factors that may be contributing to overall injury. While these factors, in some cases, may account for the injury to the domestic industry, they also may demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.").

service debts, 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.”¹³²

The record in these investigations shows that most of the domestic industry’s performance indicators declined from 2017 to 2019, notwithstanding modest increases in some indicators in 2018. The domestic industry’s capacity increased by 9.3 percent between 2017 and 2019, from 1.00 billion pounds in 2017 to 1.04 billion pounds in 2018, and 1.10 billion pounds in 2019.¹³³ Production declined by 6.4 percent between 2017 and 2019, increasing from 682.2 million pounds in 2017 to 711.7 million pounds in 2018, and then decreasing to 638.9 million in 2019.¹³⁴ The domestic industry’s capacity utilization declined by 9.8 percentage points from 2017 to 2019, increasing from 68.1 percent in 2017 to 68.7 percent in 2018, and then decreasing to 58.3 percent in 2019.¹³⁵

The domestic industry’s U.S. shipments and market share also declined from 2017 to 2019. The domestic industry’s U.S. shipments declined by *** percent from 2017 to 2019, increasing from *** pounds in 2017 to *** pounds in 2018, and then decreasing to *** pounds in 2019.¹³⁶ The domestic industry’s market share declined by *** percentage points between 2017 and 2019, increasing from *** percent in 2017 to *** percent in 2018, and then decreasing to *** percent in 2019.¹³⁷ End-of-period inventories increased from 72.0 million pounds in 2017 to 79.4 million pounds in 2018, and then declined for 72.9 million pounds in 2019.¹³⁸

Several employment-related indicators declined between 2017 and 2019. The number of production and related workers (“PRWs”) declined steadily by 8.0 percent from 2017 to

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

¹³³ CR/PR at Tables III-5, C-1. The domestic industry’s capacity in the interim periods remained constant at 746.6 million pounds. *Id.*

¹³⁴ CR/PR at Tables III-5, C-1. The domestic industry’s production was 440.5 million pounds in interim 2019 and 510.1 million pounds in interim 2020. *Id.*

¹³⁵ CR/PR at Tables III-5, C-1. The domestic industry’s capacity utilization was 59.0 percent in interim 2019 and 68.3 percent in interim 2020. *Id.*

¹³⁶ CR/PR at Tables III-7, C-1. The domestic industry’s U.S. shipments were *** pounds in interim 2019 and higher, at *** pounds, in interim 2020. *Id.*

¹³⁷ CR/PR at Tables IV-13, C-1. The domestic industry’s share of apparent U.S. consumption was *** percent in interim 2019 and higher, at *** percent, in interim 2020. *Id.*

¹³⁸ End-of-period inventories were 63.4 million pounds in interim 2019 and 63.5 million pounds in interim 2020.

2019.¹³⁹ Total hours worked declined during this period by 7.0 percent.¹⁴⁰ Other indicators, including wages paid,¹⁴¹ productivity,¹⁴² and unit labor costs¹⁴³ increased during this period.

Most of the domestic industry's financial performance indicators declined between 2017 and 2019. While the domestic industry's net sales revenues increased during this period, its total COGS increased more rapidly, and its gross profits sharply declined. Net sales value increased by 9.1 percent from 2017 to 2019, increasing from \$295.0 million in 2017 to \$362.1 million in 2018, then decreasing to \$321.7 million in 2019.¹⁴⁴ Total COGS increased by 20.3 percent during this period, increasing from \$259.8 million in 2017 to \$325.3 million in 2018, then decreasing to \$312.4 million in 2019.¹⁴⁵ Consequently, the domestic industry's ratio of COGS to net sales increased from 88.1 percent in 2017 to 89.8 percent in 2018 and 97.1 percent in 2019.¹⁴⁶ Gross profit declined by 73.6 percent during this period, increasing from \$35.2 million in 2017 to \$26.8 million in 2018, and then decreasing to \$9.3 million in 2019.¹⁴⁷

Operating income declined from \$16.2 million in 2017 to \$15.7 million in 2018, and then to an operating loss of \$8.2 million in 2019.¹⁴⁸ The domestic industry's operating margin declined from 5.5 percent in 2017 to 4.3 percent in 2018, and was negative 2.6 percent in 2019.¹⁴⁹ Net income declined from \$14.9 million in 2017 to \$14.4 million in 2018, and to a net

¹³⁹ The number of PRWs fell from 411 in 2017 to 398 in 2018 and 378 in 2019. CR/PR at Tables III-9, C-1. It was 331 in interim 2019 and 373 in interim 2020. *Id.*

¹⁴⁰ Total hours worked increased from 953,000 hours in 2017 to 973,000 hours in 2018, then decreased to 886,000 hours in 2019. CR/PR at Tables III-9, C-1. They totaled 619,000 hours in interim 2019 and 663,000 hours in interim 2020. *Id.*

¹⁴¹ Wages paid increased from \$19.2 million in 2017 to \$20.6 million in 2018, then decreased to \$19.4 million in 2019. CR/PR at Tables III-9, C-1. They totaled \$13.5 million in interim 2019 and \$15.1 million in interim 2020. *Id.*

¹⁴² Productivity (in pounds per hour) increased from 715.9 in 2017 to 731.4 in 2018, then decreased to 721.1 in 2019. CR/PR at Tables III-9, C-1. It was 711.7 in interim 2019 and 769.3 in interim 2020. *Id.*

¹⁴³ Unit labor costs (in dollars per hour) increased from \$28.15 in 2017 to \$28.99 in 2018 and \$30.39 in 2019. CR/PR at Tables III-9, C-1. They were \$30.56 in interim 2019 and \$29.66 in interim 2020. *Id.*

¹⁴⁴ CR/PR at Tables VI-1, C-1. They were \$228.0 million in interim 2019 and \$237.8 million in interim 2020. *Id.*

¹⁴⁵ CR/PR at Tables VI-1, C-1. They were \$222.0 million in interim 2019 and \$215.0 in interim 2020. *Id.*

¹⁴⁶ CR/PR at Tables VI-1, C-1. It was 97.4 percent in interim 2019 and 90.4 percent in interim 2020. *Id.*

¹⁴⁷ CR/PR at Tables VI-1, C-1. It was \$5.9 million in interim 2019 and \$22.8 million in interim 2020. *Id.*

¹⁴⁸ CR/PR at Tables VI-1, C-1. It was negative \$5.8 million in interim 2019 and \$6.7 million in interim 2020. *Id.*

¹⁴⁹ CR/PR at Tables VI-1, C-1. It was negative 2.5 percent in interim 2019 and 2.8 percent in interim 2020. *Id.*

loss of \$9.3 million in 2019.¹⁵⁰ The domestic industry's net income margin declined from 5.1 percent in 2017 to 4.0 percent in 2018, and then to negative 2.9 percent in 2019.¹⁵¹ Capital expenditures declined by 61.8 percent between 2017 and 2019, decreasing from \$36.1 million in 2017 to \$8.4 million in 2018, and then increasing to \$13.8 million in 2019.¹⁵² Net asset values increased from \$245.9 million in 2017 to \$251.4 million in 2018 and then declined for \$242.6 million in 2019; operating return on assets declined from 6.6 percent in 2017 to 6.2 percent in 2018 and negative 3.4 percent in 2019.¹⁵³ Four of five responding producers reported that the subject imports had negative effects on investment, growth, and development.¹⁵⁴

From 2017 and 2019, significant and increasing volumes of cumulated subject imports entered the U.S. market that significantly undersold the domestic like product and took sales and market share from the domestic industry. As a result, the domestic industry's output and revenue were lower than they would have been otherwise. The significant price suppressing effects of subject imports during this period further reduced revenues of the domestic industry from the levels it would otherwise have obtained. Consequently, the domestic industry's production and shipments declined from 2017 to 2019 and its financial performance declined, with the domestic industry sustaining operating and net losses in 2019.¹⁵⁵ In light of these considerations, we find that subject imports had a significant impact on the domestic industry.

We have also considered whether there are other factors that may have had an impact on the domestic industry during the POI to ensure that we are not attributing injury from such other factors to cumulated subject imports. Nonsubject imports had a small and declining presence in the U.S. market from 2017 to 2019 and cannot explain the domestic industry's market share losses during that period.¹⁵⁶

The GOI argues that several factors other than subject imports explain the domestic industry's declining performance over the POI. These include the impact of Section 232 tariffs

¹⁵⁰ CR/PR at Tables VI-1, C-1. It was negative \$6.7 million in interim 2019 and \$4.7 million in interim 2020. *Id.*

¹⁵¹ CR/PR at Tables VI-1, C-1. It was negative 2.9 in interim 2019 and 2.0 percent in interim 2020.

¹⁵² CR/PR at Tables VI-5, C-1. They were \$11.3 million in interim 2019 and \$3.2 million in interim 2020. *Id.* The industry's research and development expenses during the POI were nominal. *Id.*, at Table VI-5.

¹⁵³ CR/PR at Table VI-5.

¹⁵⁴ CR/PR at Table VI-7.

¹⁵⁵ Our impact analysis has focused principally on the period from 2017 to 2019, because, for the reasons stated above, we have accorded reduced weight to the data for interim 2020. We nevertheless observe that the domestic industry's operating income and net income ratios were worse in interim 2020 than in 2017 or 2018. CR/PR at Table VI-1.

¹⁵⁶ The market share of nonsubject imports declined steadily from *** percent in 2017 to *** percent in 2019. CR/PR at Table IV-13. Moreover, despite the increased presence of nonsubject imports in the market in interim 2020, the domestic industry achieved production, shipments, and financial results that exceeded the levels of interim 2019. *Id.* at Tables IV-13 and VI-1.

on wire rod prices and availability, a decline in demand from 2018 to 2019, and a 22 percent increase in other factory costs purportedly due to “internal {industry} problems” in 2019.¹⁵⁷ However, none of these alleged factors would explain the losses in market share we have attributed to subject imports.¹⁵⁸ Moreover, while section 232 tariffs were among factors that contributed to raw material costs increasing between 2017 to 2019, they do not explain why the domestic industry could not raise prices commensurately to recover these costs in a period of stable to increasing demand.¹⁵⁹ From 2018 to 2019, when the domestic industry exhibited its most severe cost-price squeeze, the quantity and market share of subject imports increased substantially (by 14.0 percent and 4.4 percentage points respectively).¹⁶⁰ Last, while other factory costs increased between 2017 and 2019, this is not the reason the industry experienced a cost-price squeeze; as discussed in section VI.D. above, even irrespective of other factory costs, from 2017 to 2019 the domestic industry’s unit sales values increased by less than the increase in unit raw materials costs.¹⁶¹

We consequently conclude that other causes cannot explain the injury we have attributed to the cumulated subject imports. We accordingly determine that the domestic industry was materially injured by reason of cumulated subject imports.

VII. Critical Circumstances

A. Legal Standards

In its final antidumping duty determinations, Commerce found that critical circumstances exist with respect to certain subject producers/exporters in Colombia, Egypt, the Netherlands, and Turkey.¹⁶² Because we have determined that the domestic industry is

¹⁵⁷ Tr at 12; GOI’s Posthearing Br. at 5.

¹⁵⁸ We acknowledge that the record indicates that one producer reported a two-month supply constraint in mid-2018 following the issuance of Section 232 tariffs, which prompted it to place customers on allocation. CR/PR at II-11. In our view, this brief supply constraint at one producer does not indicate that there were industry-wide shortages of domestically manufactured PC strand caused by a lack of wire rod availability.

¹⁵⁹ As indicated in section VI.C. above, the record contains evidence that petitioners unsuccessfully attempted to raise prices between 2017 to 2019 to cover rising costs due to subject import competition.

¹⁶⁰ CR/PR at Tables IV-12-13, VI-1, C-1. By contrast, the domestic industry’s cost-price squeeze problems were far less severe from 2017 to 2018, when cumulated subject import market penetration declined. *Id.*

¹⁶¹ See CR/PR at Table VI-2.

¹⁶² Commerce made affirmative critical circumstances findings with respect to all exporters from Egypt. It found that critical circumstances exist with respect to Knight S.A.S. from Columbia, and Nedri Spanstaal B.V. from the Netherlands. In the antidumping duty investigation on PC strand from Turkey, Commerce found that critical circumstances do not exist with respect to Celik Halat ve Tel Sanayi A.S., but do exist with respect to Güney Celik Hasir ve Demir and all other producers of subject merchandise from Turkey. Commerce 8-Country AD Final, 85 Fed. Reg. at 80001-80002.

materially injured by reason of subject imports from these four countries, we must further determine "whether the imports subject to the affirmative {Commerce critical circumstances} determination ... are likely to undermine seriously the remedial effect of the antidumping {and/or countervailing duty} order{s} to be issued."¹⁶³

The SAA indicates that the Commission is to determine "whether, by massively increasing imports prior to the effective date of relief, the importers have seriously undermined the remedial effect of the order" and specifically "whether the surge in imports prior to the suspension of liquidation, rather than the failure to provide retroactive relief, is likely to seriously undermine the remedial effect of the order."¹⁶⁴ The legislative history for the critical circumstances provision indicates that the provision was designed "to deter exporters whose merchandise is subject to an investigation from circumventing the intent of the law by increasing their exports to the United States during the period between initiation of an investigation and a preliminary determination by {Commerce}."¹⁶⁵ An affirmative critical circumstances determination by the Commission, in conjunction with an affirmative determination of material injury by reason of subject imports, would normally result in the retroactive imposition of duties for those imports subject to the affirmative Commerce critical circumstances determination for a period 90 days prior to the suspension of liquidation.

The statute provides that, in making this determination, the Commission shall consider, among other factors it considers relevant,

- (I) the timing and the volume of the imports,
- (II) a rapid increase in inventories of the imports, and
- (III) any other circumstances indicating that the remedial effect of the {order} will be seriously undermined.¹⁶⁶

In considering the timing and volume of subject imports, the Commission's practice is to consider import quantities prior to the filing of the petition with those subsequent to the filing

¹⁶³ 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

¹⁶⁴ SAA at 877.

¹⁶⁵ *ICC Industries, Inc. v United States*, 812 F.2d 694, 700 (Fed. Cir. 1987), quoting H.R. Rep. No. 96-317 at 63 (1979), *aff'g* 632 F. Supp. 36 (Ct. Int'l Trade 1986). See 19 U.S.C. §§ 1671b(e)(2), 1673b(e)(2).

¹⁶⁶ 19 U.S.C. §§ 1671d(b)(4)(A)(ii), 1673d(b)(4)(A)(ii).

of the petition using monthly statistics on the record regarding those firms for which Commerce has made an affirmative critical circumstances determination.^{167 168}

B. Party Arguments

Petitioners contend that the Commission should use a three-month comparison period as subject imports from Colombia, Egypt, the Netherlands, and Turkey surged into the U.S. market in the first two months of the post-petition period, but began to slow in anticipation of possible affirmative critical circumstances findings. Petitioners argue that a rapid increase in inventories of subject imports also supports affirmative critical circumstances determinations. They also contend that the highly vulnerable condition of the domestic industry supports affirmative critical circumstances determinations.¹⁶⁹

CRP contends that the Commission should examine different two five-month comparison periods to assess the timing and volume of subject imports. The first is comparing May-September 2019 with May-September 2020, so as to account for the seasonality of construction periods. The second is comparing November 2019-March 2020 (the five months preceding the filing of the petition) with April-August 2020 (the five months following the filing of the petition). It submits that if either May-September 2019 or November 2019-March 2020 is chosen as the pre-petition period, a negative critical circumstances finding on imports from Colombia is warranted because imports decreased from the pre-petition to the post-petition period.¹⁷⁰

¹⁶⁷ See *Lined Paper School Supplies from China, India, and Indonesia*, Inv. Nos. 701-TA-442-43, 731-TA-1095-97, USITC Pub. 3884 at 46-48 (Sept. 2006); *Carbazole Violet Pigment from China and India*, Inv. Nos. 701-TA-437 and 731-TA-1060-61 (Final), USITC Pub. 3744 at 26 (Dec. 2004); *Certain Frozen Fish Fillets from Vietnam*, Inv. No. 731-TA-1012 (Final), USITC Pub. 3617 at 20-22 (Aug. 2003).

¹⁶⁸ Commissioners Kearns and Karpel observe that the statute directs the Commission to consider the following factors in making this determination: “the timing and volume the imports, a rapid increase in the inventories of the imports, and any other circumstances indicating that the remedial effect of the antidumping order will be seriously undermined.” 19 U.S.C. §1673d(b)(4)(A)(ii). In their analysis, they would therefore take into account a number of factors as appropriate to a given investigation (as directed by the statute) and do not necessarily give precedence to the pre- and post-petition subject import volumes. Among the factors they may consider, depending on the facts of the investigation and the parties’ arguments, are subject import volumes relative to apparent U.S. consumption or production, monthly changes in subject import volume, subject import inventories (both absolute and relative to imports or shipments of imports), purchaser inventories, pricing, and the domestic industry’s performance.

¹⁶⁹ Petitioners’ Prehearing Br. at 91-97.

¹⁷⁰ CRP’s Prehearing Br. at 3-7, Exh. 1.

TIMAL submits that subject imports from Turkey declined using six-month pre- and post-petition -periods and that, while subject imports increased using a five-month comparison period, the increase is insufficient to undermine the effectiveness of any potential order.¹⁷¹

C. Analysis

We first consider the appropriate period for comparison of pre-petition and post-petition levels of the imports subject to the affirmative critical circumstances findings. In previous investigations, the Commission has relied on a shorter than six-month comparison period when Commerce's preliminary determination applicable to the country at issue fell within the six-month post-petition period the Commission typically considers.¹⁷² That situation arises here.¹⁷³ We have therefore compared the volume of subject imports using five-month comparison period.^{174 175}

We consider imports from each of the subject countries for which Commerce made affirmative critical circumstances findings below.

Colombia. Imports of PC strand from Colombia subject to Commerce's affirmative critical circumstances finding increased from *** pounds to *** pounds between the two five-month periods (December 2019 through April 2020 and May through September 2020), an

¹⁷¹ TIMAL's Written Statement at 4-7, Att. 1.

¹⁷² Certain Hot-Rolled Steel Flat Products from Australia, Brazil, Japan, Korea, the Netherlands, Turkey, and the United Kingdom, Inv. Nos. 701-TA-545-547, 731-TA-1291-1297 (Final), USITC Pub. 4638 at 49-50 (Sept. 2016); Certain Corrosion-Resistance Steel Products from China, India, Italy, Korea, and Taiwan, Inv. No. 701-TA-534-537 and 731-TA-1274-1278 (Final), USITC Pub. 4630 at 35-40 (July 2016); Carbon and Certain Steel Wire Rod from China, Inv. Nos. 701-TA-512, 731-TA-1248 (Final), USITC Pub. 4509 at 25-26 (Jan. 2015) (using five-month periods because preliminary Commerce countervailing duty determination was during the sixth month after the petition).

¹⁷³ Commerce issued its initial preliminary determinations in both the countervailing duty and antidumping investigations in September 2020, within the fifth month of the May-October 2020 post-petition period. See *Prestressed Concrete Steel Wire from the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, in Part*, 85 Fed. Reg. 59287 (Sep. 21, 2020); *Prestressed Concrete Steel Wire Strand from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, the Republic of Turkey, and the United Arab Emirates: Preliminary Affirmative Determinations of Sales at Less than Fair Value and Preliminary Affirmative Critical Circumstances Determinations, in Part*, 85 Fed. Reg. 61722 (Sep 30, 2020).

¹⁷⁴ The petitions in these investigations were filed on April 16, 2020. Because this date falls within the second half of the month, April is included in the "pre-petition" period, per the Commission's practice. While the Commission notes that there is an element of seasonality to purchase of PC strand, it is not of such a degree to warrant departure from the general mode of comparing periods immediately preceding and succeeding the filing of the petition.

¹⁷⁵ We have also examined six-month periods, and find that the choice of five- or six-month periods does not affect our conclusions. We decline to use the three-month comparison period proposed by Petitioners as this would not be consistent with the agency's practice, nor is there a basis for departing from the agency's practice in these investigations.

increase of 11.3 percent.¹⁷⁶ U.S. importers' end-of-period inventories of subject imports from Colombia were substantially lower at *** pounds in September 2020 than in December 2019 at *** pounds.¹⁷⁷

We note that subject imports from Colombia increased during the five-month post-petition period. We find, however, that this increase is not of a degree, in either absolute or relative terms, that would undermine seriously the remedial effect of the antidumping duty order, given the small size of the increase relative to apparent U.S. consumption,¹⁷⁸ and in light of the lower inventories in September 2020 compared with December 2019. There are also no indications of any other circumstances demonstrating that the remedial effect of the order will be or has been seriously undermined by the post-petition imports from Colombia.¹⁷⁹

We thus find that the imports from Colombia subject to Commerce's critical circumstances determination are not likely to undermine seriously the remedial effect of the antidumping duty order, and we make a negative critical circumstances finding with regard to those imports.

Egypt. All imports of PC strand from Egypt were subject to Commerce's affirmative critical circumstances finding and increased from *** pounds to *** pounds between the two five-month periods (December 2019 through April 2020 and May through September 2020), a 102.6 percent increase.¹⁸⁰ U.S. importers' end-of-period inventories of subject imports from Egypt were substantially lower at *** pounds in September 2020 than at *** pounds in December 2019.¹⁸¹

We note that subject imports from Egypt increased during the five-month post-petition period. We find, however, that this increase is not of a degree, in either absolute or relative terms, that would undermine seriously the remedial effect of the antidumping duty order,

¹⁷⁶ CR/PR at Table IV-3. Using the two six-month periods (Nov. 2019-April 2020 and May-October 2020), subject PC strand imports from Colombia declined from *** pounds to *** pounds, a decline of 11.6 percent. *Id.* Available subject import data are overstated as they concern all subject imports from Colombia. *Id.* at Note.

¹⁷⁷ CR/PR at Table VII-54. Available inventory data do not correspond precisely to the comparison periods. They are overstated because they concern all subject imports from Colombia.

¹⁷⁸ Apparent U.S. consumption of PC strand was *** pounds in 2019. CR/PR at Table IV-12. Apparent domestic consumption in the interim 2020 period was *** pounds. Subject imports from Colombia totaled *** pounds in the five-month post-petition period, which was roughly equivalent to just *** percent of consumption in the interim 2020 period.

¹⁷⁹ See *Petitioners' Posthearing Br.*, Exh. 1 at 2-6. On this record, Petitioners' argument that the industry is in a highly vulnerable condition for purposes of critical circumstances analysis is difficult to reconcile with their argument for purposes of impact analysis that post-petition data should be given limited weight in light of the industry's improvement in interim 2020.

¹⁸⁰ The same percentage increase exists when comparing a five-month or six-month post-petition period. CR/PR at Table IV-4.

¹⁸¹ CR/PR at Table VII-54. Available inventory data do not correspond precisely to the comparison periods.

given the small size of the increase relative to apparent U.S. consumption,¹⁸² and in light of the lower inventories in September 2020 compared to December 2019. There are also no indications of any other circumstances demonstrating that the remedial effect of the order will be or has been seriously undermined by the post-petition imports from Egypt.

We thus find that the imports from Egypt would not undermine seriously the remedial effect of the antidumping duty order, and we make a negative critical circumstances finding with regard to those imports

Netherlands. Imports of PC strand from the Netherlands subject to Commerce's affirmative critical circumstances finding declined from *** pounds to *** pounds between the two five-month periods (December 2019 through April 2020 and May through September 2020), a decline of 38.1 percent.¹⁸³ U.S. importers' end-of-period inventories of subject imports were zero throughout the POI.¹⁸⁴

Subject imports from the Netherlands declined in the five-month post-petition period. In light of this and the general improvement in the state of the domestic industry during interim 2020, we find that the imports from the Netherlands subject to Commerce's antidumping duty critical circumstances determination would not undermine seriously the remedial effect of the antidumping duty order, and we make a negative critical circumstances finding with regard to those imports.

Turkey. Imports of PC strand from Turkey subject to Commerce's affirmative critical circumstances finding increased from *** pounds to *** pounds between the two five-month periods (December 2019 through April 2020 and May through September 2020), an increase of 16.8 percent.¹⁸⁵ U.S. importers' end-of-period inventories of subject imports were lower, at *** pounds in September 2020 than at *** pounds in December 2019.¹⁸⁶

¹⁸² Apparent U.S. consumption of PC strand was *** pounds in 2019. CR/PR at Table IV-12. Apparent domestic consumption in the interim 2020 period was *** pounds. Subject imports from Egypt totaled *** pounds in the five-month post-petition period, which was roughly equivalent to just *** percent of apparent domestic consumption in the interim 2020 period.

¹⁸³ CR/PR at Table IV-6. Using the two six-month periods (Nov. 2019-April 2020 and May-October 2020), subject PC strand imports from the Netherlands declined from *** pounds to *** pounds, a decline of 66.3 percent. Available subject import data are overstated as they concern all subject imports from the Netherlands. *Id.* at Note.

¹⁸⁴ CR/PR at Table VII-54. We acknowledge, as petitioners stress, that inventory data for the Netherlands are likely understated because of the lack of importer coverage.

¹⁸⁵ CR/PR at Table IV-7. Using the two six-month periods (Nov. 2019-April 2020 and May-October 2020), subject PC strand imports from Turkey declined from *** pounds to *** pounds, a decline of 34.3 percent. *Id.* Available subject import data are overstated as they concern all subject imports from Turkey. *Id.* at Note.

¹⁸⁶ CR/PR at Table VII-54. Available inventory data do not correspond precisely to the comparison periods. They are overstated because they concern all subject imports from Turkey.

We note that subject imports from Turkey increased during the five-month post-petition period. We find, however, that this increase is not of a degree, in either absolute or relative terms, that would undermine seriously the remedial effect of the antidumping duty order, given the small size of the increase relative to apparent U.S. consumption,¹⁸⁷ and in light of the lower inventories in September 2020 compared with December 2019. There are also no indications of any other circumstances demonstrating that the remedial effect of the order will be or has been seriously undermined by post-petition imports from Turkey.

We thus find that the imports from Turkey subject to Commerce's critical circumstances determination would not undermine seriously the remedial effect of the antidumping duty order, and we make a negative critical circumstances finding with regard to those imports.¹⁸⁸

VIII. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of PC strand from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and the UAE that are sold in the United States at less than fair value and imports of the subject merchandise from Turkey that are subsidized by the government of Turkey. We also find that critical circumstances do not exist with respect to subject imports from Colombia, Egypt, the Netherlands, and Turkey subject to Commerce's affirmative critical circumstances determinations.

¹⁸⁷ Apparent U.S. consumption of PC strand was *** pounds in 2019. CR/PR at Table IV-12. Apparent domestic consumption in the interim 2020 period was *** pounds. Subject imports from Turkey totaled *** pounds in the five-month post-petition period, which was roughly equivalent to just *** percent of apparent domestic consumption in the interim 2020 period.

¹⁸⁸ Commissioners Kearns and Karpel concur that the record in this investigation does not support a finding that the imports from the several countries subject to Commerce's critical circumstance finding would undermine seriously the remedial effects of the order. Consistent with their approach outlined above, their finding in these investigations is based on record evidence regarding factors including pre- and post-petition subject import volumes including relative to consumption as well as monthly changes in subject import volumes, subject import inventories, and pricing trends.

With respect to pricing trends, they compared third-quarter 2019 pricing data to third-quarter 2020 pricing data, as recorded in the Staff Report at Tables V-3 and V-4 (quarterly pricing for Product 1 and Product 2, respectively). They note that the average f.o.b. price of subject imports from Colombia, Egypt and Turkey increased for both Products 1 and 2 between the third quarter of 2019 and the third quarter of 2020 (there were no reported pricing data for subject imports from the Netherlands). As such, subject imports' pricing trends do not support a finding that the remedial effect of the orders would be seriously undermined by post-petition subject imports from Colombia, Egypt or 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”)¹ 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.^{2 3}

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

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

³ A list of witnesses that appeared at the hearing 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 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)
June 1, 2020	Commission's preliminary determinations (85 FR 34648, June 5, 2020)
September 1, 2020	Commerce's postponement of preliminary determinations in the LTFV investigations—Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Ukraine (85 FR 55413, September 8, 2020)
September 14, 2020	Commerce's preliminary determination Turkey-CVD and preliminary affirmative critical circumstances determination, in part (85 FR 59287, September 21, 2020)
September 23, 2020	Commerce's preliminary determinations LTFV and preliminary affirmative critical circumstances determinations, in Part—Argentina, Colombia, Egypt, Netherlands, Saudi Arabia, Turkey, and United Arab Emirates (85 FR 61722, September 30, 2020); Commerce's preliminary affirmative determination LTFV and negative preliminary determination of critical circumstances—Taiwan (85 FR 61726, September 30, 2020)
September 23, 2020	Scheduling of final phase of Commission investigations (85 FR 63576, October 8, 2020)
November 5, 2020	Alignment of final CVD determination--Turkey with AD determinations—Argentina, Colombia, Egypt, Netherlands, Saudi Arabia, Taiwan, Turkey, and UAE (85 FR 70585, November 5, 2020)

Effective date	Action
November 12, 2020	Commerce’s preliminary determinations LTFV and preliminary negative critical circumstances determinations, postponement of final determinations, and extension of provisional measures—Italy, Spain, and Ukraine (85 FR 73679, 73683, and 73688, November 19, 2020); Commerce’s preliminary affirmative determination LTFV and preliminary affirmative determination of critical circumstances, in part, postponement of final determination, and extension of provisional measures—Indonesia (85 FR 73676, November 19, 2020); Commerce’s preliminary determinations LTFV, postponement of final determinations, and extension of provisional measures—Malaysia, South Africa, and Tunisia (85 FR 73674, 73681, and 73685, November 19, 2020)
December 11, 2020	Commerce’s final determinations LTFV and final affirmative critical circumstances determinations, in part—Argentina, Colombia, Netherlands, Saudi Arabia, Taiwan, Turkey, and UAE (85 FR 80001, December 11, 2020); Commerce’s final affirmative determination CVD and final negative critical circumstances determination (85 FR 80005, December 11, 2020)
December 10, 2020	Commission’s hearing
January 8, 2021	Commission’s vote
January 25, 2021	Commission’s views

Statutory criteria

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

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

determination regarding whether there is material injury by reason of imports.

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

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

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

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

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

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

Organization of report

Part I of this report presents information on the subject merchandise, 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.

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 *** pounds (\$****) in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from subject sources totaled 280.3 million pounds (\$114.1 million) in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** percent by value. U.S. imports from nonsubject sources totaled 33.1 million pounds (\$14.8 million) in 2019 and accounted for *** percent of apparent U.S. consumption by quantity and *** 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 12 U.S. importers accounting for 87.4 percent of imports from subject sources and 90.1 percent of imports of PC strand from all import sources in 2019. Additionally, the Commission received 18 usable questionnaire responses from firms that have purchased PC strand since 2017. The Commission received 18 foreign producer questionnaires⁶ from firms in 12 subject countries⁷ where coverage exports of PC strand compared to U.S. imports coming from each of the subject countries ranged from ***⁸ to ***⁹ percent during 2019.

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.

⁶ The Commission received foreign producer questionnaires from four firms in the preliminary phase investigations that did not complete a foreign producer questionnaire during the final phase. These firms include; United Wires ElSewedy Co. (“United Wires”), the only responding Egyptian producer, Al Faisal Steel Products Company (“Al Faisal”) and National Metal manufacturing & Casting Co. (Maadaniyah) (“National Metal”), both are producers of PC strand in Saudi Arabia, and CB Trafilati Acciai SPA (“Trafilati”), an Italian producer of PC strand. The Commission (combined with these four foreign producer questionnaires) used a total of 22 foreign producer/exporter questionnaires.

⁷ The Commission did not receive a foreign producer/exporter questionnaire response from any firms in Colombia, Egypt, and Saudi Arabia during the final phase investigations.

⁸ 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 ***.

⁹ Foreign producer/exporter questionnaire responses (exports to the United States) are compared to official U.S. import statistics for each of the subject countries during 2019, which can result in calculations that account for a greater number of exports of PC strand entering into the United States in a given year (2019) accounting for greater than 100 percent.

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	Order recently continued after fifth review; completed November 9, 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	Orders recently continued after third reviews, completed November 9, 2020 and grouped with the fifth review for the AD on Japan.
2009	701-TA-464 and 731-TA-1160	China	Affirmative	Currently under second review, instituted September 1, 2020.

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 subsidies and sales at LTFV

Subsidies

On December 11, 2020, Commerce published a notice in the *Federal Register* of its final determination of countervailable subsidies for producers and exporters of product from Turkey.¹⁰ Table I-2 presents Commerce's findings of subsidization of PC strand in Turkey.

¹⁰ 85 FR 80005, December 11, 2020.

Table I-2**PC strand: Commerce's final subsidy determination with respect to imports from Turkey**

Entity	Final countervailable subsidy margin (percent)
Guney Celik Hasir ve Demir	30.78
Celik Halat ve Tel San A.S.	158.44
All others	94.61

Note.-- Commerce has found the following companies to be cross-owned with Celik Halat: Dogan Sirketler Grubu Holding A.S. and Adilbey Holding A.S.

Source: 85 FR 80005, December 11, 2020.

Sales at LTFV

On December 11, 2020, Commerce published a notice in the *Federal Register* of its final determinations of sales at LTFV with respect to imports from Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, Turkey, and UAE.¹¹ On November 19, 2020, Commerce published a notice in the *Federal Register* of its preliminary determinations of sales at LTFV with respect to imports from Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia and Ukraine.¹² Tables I-3 through I-17 present Commerce's dumping margins with respect to imports of product from Argentina, Colombia, Egypt, Indonesia, Italy, Malaysia, Netherlands, Saudi Arabia, South Africa, Spain, Taiwan, Tunisia, Turkey, Ukraine, and UAE.

Table I-3**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Argentina**

Exporter/producer	Final dumping margin (percent)
Acindar Industria (Argentina) de Sinal S.A.	60.40
All others	60.40

Source: 85 FR 80001, December 11, 2020.

¹¹ 85 FR 80001, December 11, 2020.

¹² 85 FR 73674-73688, November 19, 2020.

Table I-4**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Colombia**

Exporter/producer	Final dumping margin (percent)
Knight SAS	86.09
All others	86.09

Source: 85 FR 80001, December 11, 2020.

Table I-5**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Egypt**

Exporter/producer	Final dumping margin (percent)
United Wires Company Elsewedy	29.72
All others	29.72

Source: 85 FR 80001, December 11, 2020.

Table I-6**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Indonesia**

Exporter/producer	Preliminary dumping margin (percent)
PT Kingdom Indah	2.96
PT Bumi Steel Indonesia	72.28
All others	2.96

Source: 85 FR 73676, November 19, 2020.

Table I-7**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Italy**

Exporter/producer	Preliminary dumping margin (percent)
WBO Italcables Societa Cooperativa	3.67
CB Trafilati Acciai S.p.A	19.26
All others	3.67

Source: 85 FR 73679, November 19, 2020.

Table I-8**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Malaysia**

Exporter/producer	Preliminary dumping margin (percent)
Kiswire Sdn Bhd	3.70
Wei Dat Steel Wire Sdn. Bhd	5.45
Southern PC Steel Sdn. Bhd	18.93
All others	4.56

Source: 85 FR 73685, November 19, 2020.

Table I-9**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Netherlands**

Exporter/producer	Final dumping margin (percent)
Nedri Spanstaal B.V.	30.86
All others	30.86

Source: 85 FR 80001, December 11, 2020.

Table I-10**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Saudi Arabia**

Exporter/producer	Final dumping margin (percent)
National Metal Manufacturing & Casting Co.	194.40
All others	194.40

Source: 85 FR 80001, December 11, 2020.

Table I-11**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from South Africa**

Exporter/producer	Preliminary dumping margin (percent)
Scaw Metals Group	59.27
All others	59.27

Source: 85 FR 73674, November 19, 2020.

Table I-12**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Spain**

Exporter/producer	Preliminary dumping margin (percent)
Global Special Steel Products S.A.U. (d.b.a. Trenzasa y Cables de Acero PSC, S.L. (TYCSA))	14.75
All others	14.75

Source: 85 FR 73683, November 19, 2020.

Table I-13**PC strand: Commerce's Final weighted-average LTFV margins with respect to imports from Taiwan**

Exporter/producer	Final dumping margin (percent)
Chia Ta World Co., Ltd	23.89
All others	23.89

Source: 85 FR 80001, December 11, 2020.

Table I-14**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Tunisia**

Exporter/producer	Preliminary dumping margin (percent)
Maklada Industries/Maklada SA	32.72
All others	32.72

Source: 85 FR 73681, November 19, 2020.

Table I-15**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from Turkey**

Exporter/producer	Final dumping margin (percent)
Celik Halat ve Tel Sanayi A.S.	53.65
Guney Celik Hasir ve Demir	53.65
All others	53.65

Source: 85 FR 80001, December 11, 2020.

Table I-16**PC strand: Commerce's preliminary weighted-average LTFV margins with respect to imports from Ukraine**

Exporter/producer	Preliminary dumping margin (percent)
PJSC PA Stalkanat-Silur	19.32
All others	19.32

Source: 85 FR 73688, November 19, 2020.

Table I-17**PC strand: Commerce's final weighted-average LTFV margins with respect to imports from United Arab Emirates**

Exporter/producer	Final dumping margin (percent)
GSS International Trading FZE	170.65
Gulf Steel Strands FZE	170.65
All others	170.65

Source: 85 FR 80001, December 11, 2020.

The subject merchandise

Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:¹³

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./ft² 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 this investigation is imported under the following provisions of the *Harmonized Tariff Schedule of the United States* (“HTSUS” or “HTS”): 7312.10.3010 and 7312.10.3012. The 2020 general rate of duty is “Free” for HTS subheading 7312.10.30.¹⁴ Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection (“CBP”).

Section 232 tariff treatment

The hot-rolled wire rod, classifiable under the HTS headings of chapter 72, for manufacturing PC strand was included in the enumeration of iron and steel articles (imported on or after March 23, 2018) that became subject to the additional 25 percent ad valorem duty

¹³ 85 FR 59287, September 21, 2020; 85 FR 61722, September 30, 2020.

¹⁴ HTSUS (2020), Revision 26, USITC Publication 5134, October 2020, pp. 73-26, 73-43.

under Section 232 of the *Trade Expansion Act of 1962* (“*Trade Expansion Act*”), as amended.¹⁵ At this time, imports of long steel products, including hot-rolled wire rods, originating in Australia,¹⁶ Canada, and Mexico¹⁷ are exempt from duties or quota limits; imports of long steel products, including hot-rolled wire rods, originating in Argentina,¹⁸ Brazil,¹⁹ and Korea²⁰ are

¹⁵ Section 232 of the *Trade Expansion Act* (19 U.S.C. 1862) authorizes the President, on advice of the Secretary of Commerce, to adjust the imports of an article and its derivatives that are being imported into the United States in such quantities or under such circumstances as to threaten to impair the national security.

¹⁶ Imports of steel articles originating in Australia were exempted from the Section 232 duties as of March 23, 2018 (83 FR 13361, March 28, 2018), with the exemptions continued as of May 1, 2018 (83 FR 20683, May 7, 2018), and further continued as of June 1, 2018 (83 FR 40429, August 15, 2018).

¹⁷ Imports of steel articles originating in Canada and Mexico were initially exempted from the Section 232 duties as of March 23, 2018 (83 FR 11625, March 15, 2018; 83 FR 13361, March 28, 2018), but although these exemptions were not continued as of May 1, 2018 (83 FR 20683, May 7, 2018), they were restored as of May 20, 2019 (84 FR 23987, May 23, 2019).

¹⁸ Imports of steel articles originating in Argentina were exempted from the Section 232 duties as of March 23, 2018 (83 FR 13361, March 28, 2018), with the exemptions continued as of May 1, 2018 (83 FR 20683, May 7, 2018), which were continued along with annual import quota limits as of June 1, 2018 (83 FR 25857, June 5, 2018), and further continued with annual import quota limits as of August 13, 2018, 2018 (83 FR 40429, August 15, 2018).

The composition of the quota product groups may not exactly match the product scope of this investigation. For 2020 annual and fourth-quarter 2020 Section 232 import quota limits for hot-rolled (other than stainless) steel bars and rods (HTS 9903.80.46 and HTS 9903.80.48) originating in Argentina, see the CBP Quota Bulletin, “QB 20-604 2020 Absolute Quota for Steel Mill Articles: Argentina, Brazil and South Korea,” September 4, 2020, available at <https://www.cbp.gov/trade/quota/bulletins/qb-20-604-2020-absolute-quota-steel-mill-articles-argentina-brazil-and-south-korea>.

¹⁹ Imports of steel articles originating in Brazil were exempted from the Section 232 duties as of March 23, 2018 (83 FR 13361, March 28, 2018), with the exemptions continued as of May 1, 2018 (83 FR 20683, May 7, 2018), which were continued along with annual import quota limits as of June 1, 2018 (83 FR 25857, June 5, 2018), and further continued with annual import quota limits as of August 13, 2018, 2018 (83 FR 40429, August 15, 2018).

The composition of the quota product groups may not exactly match the product scope of this investigation. For 2020 annual and fourth-quarter 2020 Section 232 import quota limits for hot-rolled (other than stainless) steel bars and rods (HTS 9903.80.46 and HTS 9903.80.48) originating in Brazil, see the CBP Quota Bulletin, “QB 20-604 2020 Absolute Quota for Steel Mill Articles: Argentina, Brazil and South Korea,” September 4, 2020, available at <https://www.cbp.gov/trade/quota/bulletins/qb-20-604-2020-absolute-quota-steel-mill-articles-argentina-brazil-and-south-korea>.

²⁰ Imports of steel articles originating in Korea were exempted from the Section 232 duties as of March 23, 2018 (83 FR 13361, March 28, 2018), with the exemptions continued along with annual import quota limits as of May 1, 2018 (83 FR 20683, May 7, 2018), which were continued as of June 1, 2018 (83 FR 25857, June 5, 2018), and further continued with annual import quota limits as of August 13, 2018 (83 FR 40429, August 15, 2018).

The composition of the quota product groups may not exactly match the product scope of this investigation. For 2020 annual and fourth-quarter 2020 Section 232 import quota limits for hot-rolled (continued...)

exempted from duties but instead are subject to quota limits; and imports of long steel products, including hot-rolled wire rods, originating in all other countries are subject to the 25 percent additional duties.²¹ See U.S. notes 16(a), 16(b), and 16(e) in subchapter III of HTS chapter 99.²² In certain cases, exemptions have been granted for long steel products. Otherwise, imported PC strand is not covered by these additional duties.

The product

Description and applications

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

(...continued)

(other than stainless) steel bars and rods (HTS 9903.80.46 and HTS 9903.80.48) originating in Korea, see the CBP Quota Bulletin, “QB 20-604 2020 Absolute Quota for Steel Mill Articles: Argentina, Brazil and South Korea,” September 4, 2020, available at <https://www.cbp.gov/trade/quota/bulletins/qb-20-604-2020-absolute-quota-steel-mill-articles-argentina-brazil-and-south-korea>.

²¹ Imports of steel articles originating in the European Union member countries (“EU countries”) were exempted from the Section 232 duties as of March 23, 2018 (83 FR 13361, March 28, 2018), but the exemptions were not continued as of May 1, 2018 (83 FR 20683, May 7, 2018).

The Section 232 duty rate on imports of steel articles originating in Turkey was doubled to 50 percent ad valorem as of August 13, 2018 (83 FR 40429, August 15, 2018), but the original additional duty rate of 25 percent ad valorem subsequently was restored as of May 21, 2019 (84 FR 23421, May 21, 2019).

²² *HTSUS (2020), Revision 26*, USITC Publication 5134, October 2020, pp. 99-III-5 – 99-III-7, 99-III-225, 99-III-231, 99-III-233.

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 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.

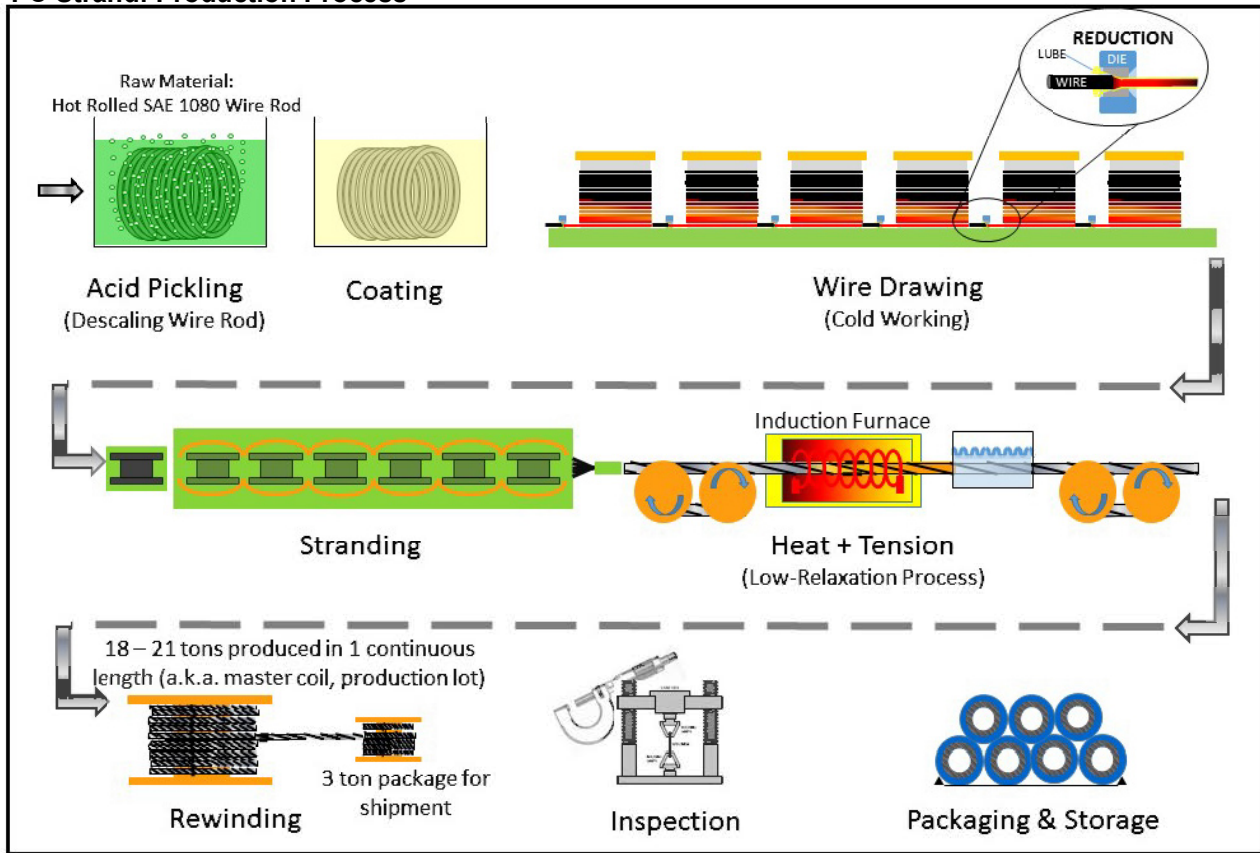
Manufacturing processes

PC strand is 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, 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. Figure I-1 details the PC strand production process.

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, September 30, 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 during the preliminary or final 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.¹

Apparent U.S. consumption of PC strand fluctuated during 2017-19, increasing by *** percent between 2017 and 2018, but decreasing by *** percent between 2018 and 2019. Overall, apparent U.S. consumption in 2019 was *** percent higher than in 2017.

U.S. purchasers

The Commission received 18 usable questionnaire responses from firms that had purchased PC strand during 2017-19.² Table II-1 reports the number of purchasers reported that purchasing PC strand from all sources and table II-2 presents the volumes of purchases and imports from each source reported by purchasers.

¹ *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.

² The following firms provided purchaser questionnaire responses: ***.

Table II-1

PC strand: Number of purchasers reporting knowledge of product from the United States, subject countries, and nonsubject countries, 2017-19

United States	Argentina	Colombia	Egypt	Indonesia	Italy	Malaysia	Netherlands	Saudi Arabia	South Africa	Spain	Taiwan	Tunisia	Turkey	Ukraine	UAE	Nonsubject
18	3	7	0	5	8	11	4	5	6	7	2	8	6	1	6	2

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

Table II-2

PC strand: Purchases and imports made by purchasers, by source, 2017-19

Source	2017	2018	2019	2017	2018	2019
	Purchases and imports (1,000 pounds)			Share of purchases and imports (percent)		
United States:						
Buy America	51,454	52,742	35,476	15.4	14.1	10.6
Non-Buy America	161,169	175,150	157,185	48.1	47.0	46.8
Total United States	212,623	227,892	192,661	63.5	61.1	57.4
Subject sources:						
Argentina	***	***	***	***	***	***
Colombia	548	5,187	5,773	0.2	1.4	1.7
Egypt	---	---	---	0.0	0.0	0.0
Indonesia	191	---	1,001	0.1	0.0	0.3
Italy	1,639	1,426	5,704	0.5	0.4	1.7
Malaysia	15,305	26,444	19,684	4.6	7.1	5.9
Netherlands	***	***	***	***	***	***
Saudi Arabia	***	***	***	***	***	***
South Africa	2,459	4,040	1,238	0.7	1.1	0.4
Spain	19,142	10,720	21,063	5.7	2.9	6.3
Taiwan	***	***	***	***	***	***
Tunisia	9,612	11,708	7,549	2.9	3.1	2.2
Turkey	5,353	5,308	10,775	1.6	1.4	3.2
Ukraine	***	***	***	***	***	***
UAE	2,347	632	414	0.7	0.2	0.1
All subject sources	57,167	68,112	74,721	17.1	18.3	22.3
Nonsubject sources	6,901	18,920	12,088	2.1	5.1	3.6
Known sources	64,068	87,032	86,809	19.1	23.3	25.9
Unknown sources	58,096	58,119	56,064	17.4	15.6	16.7
All sources	334,787	373,043	335,534	100.0	100.0	100.0

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

Twelve responding purchasers are end users of post-tension PC strand, five are end users of pre-tension PC strand, and one is a distributor. There were no end users of both pre-tension and post-tension PC strand. Nearly half (8 of 18) responding U.S. purchasers were located in the Southwest, with the remainder in each region except the Mountain region. The responding purchasers mainly represented firms in the construction sector. Large purchasers of PC strand responding to the Commission's questionnaire include ***. None were related to U.S. producers or importers of PC strand. No purchaser competes with their suppliers for sales.

Channels of distribution

U.S. producers and importers sold almost all of their PC strand to end users during 2017-19 and the first 3 quarters of 2020.³ U.S. importers of PC strand from *** were the only importers reporting any sales to distributors, but these sales were never a majority of that source's reported U.S. sales for any time period. In total, across all subject sources, sales to distributors accounted for *** percent of sales in 2017, *** percent in 2018, and *** percent in 2019; they were higher in interim 2020 (***) than in interim 2019 (**).

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-3. 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. These majorities increased for both U.S. product shipped to pre-tension applications (irregularly, from *** percent in 2017 to *** percent in 2019 and for subject imports shipped to post-tension applications (** percent in 2017 to *** percent in 2019). The shares were somewhat lower in interim 2020 than in interim 2019.

³ No data were provided for imports from the Netherlands. U.S. producer sales to distributors were ***.

Table II-3

PC strand: U.S. producers' and importers' U.S. shipments, by sources and application, 2017-19, January to September 2019 and January to September 2020

Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
U.S. producers:					
Pre-tension applications	64.7	60.2	69.9	68.4	64.6
Post-tension applications	35.3	39.8	30.1	31.6	35.4
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	***	***	***	***	***
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	***	***	***	***	***

Table continued on next page.

Table II-3—Continued

PC strand: U.S. producers' and importers' U.S. shipments, by sources and application, 2017-19, January to September 2019 and January to September 2020

Item	Calendar year			January-September	
	2017	2018	2019	2019	2020
	Share of U.S. shipments (percent)				
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	36.3	28.0	37.3	35.5	32.6
Post-tension applications	63.7	72.0	62.7	64.5	67.4
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-4).⁴ Importers reported selling mainly in the Southeast, Central Southwest, Mountains, and Pacific Coast regions, but at least two reported selling to each region of the United States. For U.S. producers, *** percent of sales were within 100 miles of their production facility, *** percent were between 101 and 1,000 miles, and *** percent were over 1,000 miles. Importers sold *** percent within 100 miles of their U.S. point of shipment, *** percent between 101 and 1,000 miles, and *** percent over 1,000 miles.

⁴ None of U.S. producers' reported top-10 customers in 2019 were located in the Mountain region.

Table II-4

PC strand: Geographic market areas in the United States served by U.S. producers and importers

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

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-5 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 subject countries and stable capacity in six countries.⁵ Capacity utilization reported by U.S. producers and in subject countries combined fell between 2017 and 2019.

⁵ ***.

Table II-5

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	***	***	***	***	***	***	***	***	***
Colombia	***	***	***	***	***	***	***	***	***
Egypt	***	***	***	***	***	***	***	***	***
Indonesia	***	***	***	***	***	***	***	***	***
Italy	***	***	***	***	***	***	***	***	***
Malaysia	***	***	***	***	***	***	***	***	***
Netherlands	***	***	***	***	***	***	***	***	***
Saudi Arabia	***	***	***	***	***	***	***	***	***
South Africa	***	***	***	***	***	***	***	***	***
Spain	***	***	***	***	***	***	***	***	***
Taiwan	***	***	***	***	***	***	***	***	***
Tunisia	***	***	***	***	***	***	***	***	***
Turkey	***	***	***	***	***	***	***	***	***
Ukraine	***	***	***	***	***	***	***	***	***
UAE	***	***	***	***	***	***	***	***	***
Total subject	***	***	***	***	***	***	***	***	***

Note: Data for *** were provided in the preliminary phase of the investigations. 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 75 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 contributing factors to this degree of responsiveness of supply are the low capacity utilization rate and increasing 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 producer reported the ability to switch between producing PC strand and other products.⁶

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.⁷ 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.

⁶ *** on the same equipment used to produce PC strand.

⁷ Responses were received from firms representing production in 12 of 15 subject countries during the final phase of the investigations. Foreign producers in three subject countries responded in the preliminary phase. No questionnaire response has been received from any subject producer in Colombia.

Production capacity in all reporting subject countries was either unchanged or increased during 2017-19. Capacity increased in eight subject countries and remained constant for six subject countries.⁸ Most of the increase (***) percent) is attributable to capacity increases in Turkey, although Malaysia accounted for *** percent of the increase and Egypt accounted for more than *** percent. In 2019, capacity utilization rates were highly variable: six subject countries had capacity utilization rates of less than 50 percent (***), one had rates between 50 and 70 percent, three between 70 and 80 percent, one between 80 and 90 percent, and three over 90 percent (***)).

Reported inventories (as a ratio to shipments volumes) in all but two of the responding subject countries increased between 2017 and 2019, with all but two countries reporting inventory ratios lower than U.S. producers' inventory ratios: ***.

Combined subject countries' exports to both the United States and to other markets accounted for about three-fifths of their total sales, although the shares varied widely by country. Shares of shipments to each countries' home market ranged from less than 3 percent (***) to over 90 percent (***). Four 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 less than 0.1 percent (***) to approximately 70 percent (***). Other countries' exports to non-subject countries were fairly evenly distributed between 4 to 48 percent. These data indicate that there is some ability to shift shipments from alternate markets. Only one foreign producer (which produced PC strand in ***) indicated an ability to shift production from PC strand to other products.⁹

Imports from nonsubject sources

Nonsubject imports accounted for 10.6 percent of total U.S. imports in 2019. The largest source of nonsubject imports during 2017-19 was Portugal. It accounted for 86.9 percent of nonsubject imports in 2019 and 9.2 percent of total imports.

⁸ The Commission did not receive any questionnaire responses from foreign producers in Colombia.

⁹ These other products included ***.

Supply constraints

One of 5 U.S. producers, *** responding importers, and 4 of 18 purchasers reported supply shortages in the U.S. market for PC strand since January 1, 2017. One U.S. producer (***) reported that for two months in mid-2018, it had difficulty obtaining wire rod and placed customers briefly on controlled order entry (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. Two importers reported supply delays and one could not fulfill orders due to high demand. Importer *** stated that it “lost work due to quotas imposed on {it} by U.S. PC strand supplier due to the 2018 Steel Tariff and 2020 PC Strand anti-dumping case” and that “one foreign supplier cancelled {its} agreement due to the 2018 Steel Tariff and did not supply the agreed upon quantity of PC strand.” One purchaser noted that supply constraints occurred because firms were “scared of {antidumping} duties,” another stated that PC strand was no longer available from certain countries, and a third noted it was “unable to procure material.” A fourth purchaser specified that Gulf Steel Strand experienced logistical issues and could not supply PC strand.

New suppliers

Two of 16 purchasers indicated that new suppliers entered the U.S. market since January 1, 2017. One purchaser noted generally that an “Egyptian supplier” entered, and another specified that “Wire Corp.” entered the market.

U.S. demand

Based on available information, the overall demand for PC strand is likely to experience very 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.

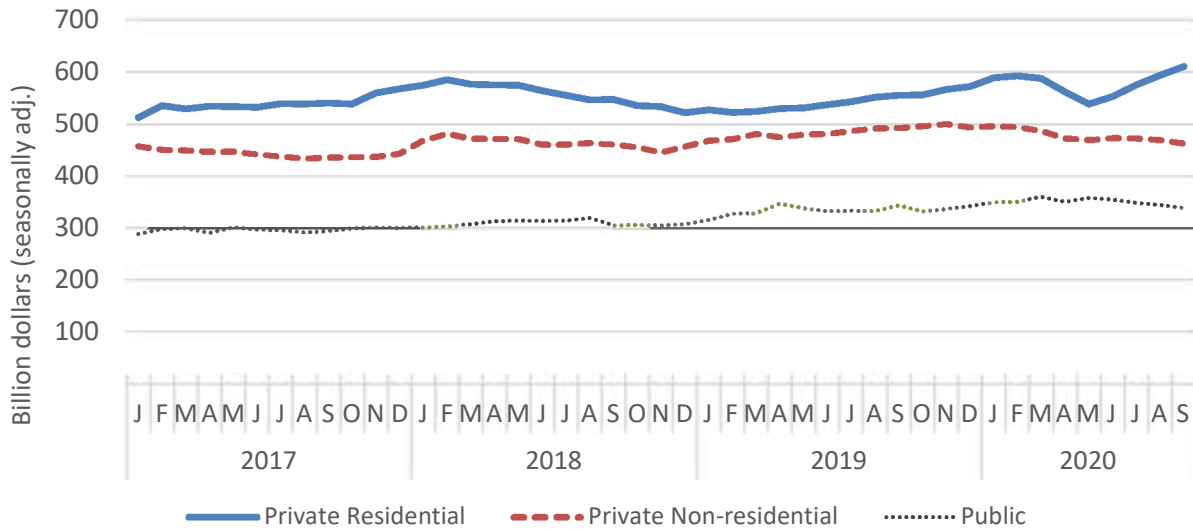
End uses and cost share

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 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 September 2020. Private residential construction reportedly uses more slabs-on-grade, a post-tensioned application, than public construction and private nonresidential construction.¹⁰ 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. Nine purchasers reported demand for their end-use products increased, seven reported fluctuating demand, one reported decreased demand, and one reported no change. Fourteen purchasers indicated these changes affected their demand for PC strand.

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. A variety of product types were reported that represented this span. Examples noting that PC strand was estimated to account for a very small proportion (2 to 6 percent) of the cost of end use items included bridges, garages, houses, and spandrels. It was estimated to account for 10 to 20 percent of the cost of beams, bridge girders, commercial concrete, concrete girders, concrete slab, housing, and precast double tees and wall panels. Further, firms estimated that PC strand accounted for a substantial share (between 40 and 65 percent) of intermediate products such as monostrand system for post tension, post tension cables, post tension slabs, post tension tendons, stay cables, and unbonded tendons. Among the uses for which PC strand was reported to account for the greatest shares (between 70 and 80 percent) were foundation slab tendons, post tension strand and post tension tendons, reinforcement of building structures, residential slab reinforcement, and slab on ground tendons.

¹⁰ 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.

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-September 2020



Source: U.S. Census Bureau, <https://www.census.gov/construction/c30/c30index.html>, retrieved November 6, 2020.

Business cycles

Two of 5 U.S. producers, *** importers, and 11 of 18 purchasers indicated that the market was subject to business cycles or conditions of competition. Specifically, firms stated that demand for PC strand is affected by macroeconomic conditions such as housing starts, interest rates, and infrastructure projects; that demand in some areas of the United States is seasonal and affected by weather; that it has been affected by conditions in the markets for steel such as demand for steel in China, wire rod and scrap price increases, fluctuating steel prices and tariffs, and imports of PC strand.

Demand trends

Most responding firms reported an increase in U.S. demand for pre-tension PC strand since January 1, 2017 (table II-6). A majority of U.S. producers and responding purchasers also indicated increasing demand in the United States for post-tension PC strand. A plurality of responding importers reported that U.S. post-tension PC strand demand had fluctuated, although multiple responding importers reported demand increasing or remaining the same. Overall, *** responding firms reported demand had increased in the United States for PC strand. Outside the United States, *** responding importers reported fluctuating demand for PC strand and both responding U.S. purchasers reported no changes in demand outside the United States for PC strand.

Table II-6
PC strand: Firms' responses regarding U.S. demand and demand outside the United States

Item	Increase	No change	Decrease	Fluctuate
Pre-tension demand in the United States				
U.S. producers	3	---	---	1
Importers	***	***	***	***
Purchasers	2	1	---	1
Post-tension demand in the United States				
U.S. producers	3	---	---	1
Importers	***	***	***	***
Purchasers	8	2	1	3
Demand in the United States (total)				
U.S. producers	4	---	---	1
Importers	***	***	***	***
Purchasers	3	2	---	---
Demand outside the United States				
U.S. producers	---	---	---	---
Importers	***	***	***	***
Purchasers	---	2	---	---

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

Substitute products

All 5 U.S. producers, 5 of 7 responding importers, and 13 of 17 responding purchasers reported that there were no substitutes for PC strand. Substitutes reported by responding importers and purchasers were rebar and wire mesh. These substitutes reportedly could be used in housing slab/concrete/foundation reinforcement. Two purchasers and both importers noted that the price of this substitute affects the price of PC strand. One importer also reported that structural steel could be a substitute in high rise and commercial construction and could affect the price of PC strand. 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 claimed that changes in the price of PC strand typically do not influence design decisions.¹¹

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, 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-America provisions in the U.S. market for PC strand, which petitioners reported cover *** of total sales. Data from responding purchasers indicated that the proportion attributable to Buy America provisions were *** percent in 2017, decreasing to *** percent in 2019.

¹¹ Petitioners' postconference brief, answers to staff questions, pp. 3-4.

Lead times

PC strand is primarily sold from inventory. U.S. producers reported that 97.2 percent of their commercial shipments came from inventories, with lead times averaging four days.¹² U.S. importers reported that *** percent of their commercial shipments were from U.S. inventories, with lead times averaging 39 days;¹³ *** percent were from foreign inventories, with lead times of 80 days; and *** percent were produced to order with lead times of 77 days.

Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for PC strand were price (17 firms), quality (12 firms), delivery/continuity of supply/service (8 firms) and availability (7 firms) as shown in table II-7. Price was the most frequently cited first-most important factor (cited by 9 firms), followed by quality (7 firms); price was the most frequently reported second-most important factor (5 firms); and availability was the most frequently reported third-most important factor (5 firms).

Table II-7

PC strand: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor

Factor	First	Second	Third	Total
Price	9	5	3	17
Quality	7	3	2	12
Delivery/supply continuity/service	1	4	3	8
Availability	1	2	5	8
Supplier relationships	1	0	1	2
Customer preference	1	0	0	1
Post-Tensioning Institute plant certification	0	2	0	2
Payment terms	0	1	4	5

Note: One purchaser also noted that “All suppliers must meet the ASTM spec” as another factor.

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

¹² The remaining 2.8 percent of their commercial shipments were produced-to-order, with lead times averaging *** days.

¹³ Reported lead times for importers varied considerably. One importer each reported lead times of 2 days, 20 days, 30 days, 60 days, 90 days, and 120 days. The importer reporting 120 days, however, also reported the same length for orders coming from foreign inventories. Importer *** stated that “It varies greatly depending on the construction project. We estimated an average of 120 days as the period between when we are awarded the order and the date of delivery to the jobsite. Some jobs take 1 month while others drag on forever (especially during recessions).” Importer *** sets its delivery schedule on a quarterly basis. Importer *** orders pursuant to lump-sum construction contracts for projects that could last up to one or two years.

Purchasers were asked how often they purchase based on lowest price, producer, and country of origin, and whether their customers purchase based on producer or country of origin. Purchasing from the lowest-price source was more frequent than purchasing based on producer or country of origin. The majority of purchasers (12 of 18) reported that they “usually” purchase the lowest-priced product, 3 “sometimes” do, 2 “always” do, and 1 “never” does. As shown in table II-8, purchasers and their customers most frequently “never” make purchasing decisions based on the producer or country of origin. However, four purchasers “always” make decisions based on producer and country of origin. Of the four purchasers that reported that they always make decisions based on the manufacturer, *** reported that it does so due to having a strategic supplier partner, and *** indicated it does so based on price and delivery time.

Table II-8
PC strand: Purchasing decisions based on producer and country of origin

Purchaser/customer decision	Always	Usually	Sometimes	Never
Purchaser makes decision based on producer	4	---	6	8
Purchaser’s customers make decision based on producer	---	1	2	12
Purchaser makes decision based on country	4	---	5	9
Purchaser’s customers make decision based on country	1	---	4	10

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

Importance of specified purchase factors

Purchasers were asked to rate the importance of 17 factors in their purchasing decisions (table II-9). The factors rated as very important by more than half of responding purchasers were price (all 18 purchasers); availability, product consistency, and reliability of supply (16 purchasers each); quality meets industry standards (15 purchasers), delivery time (11 purchasers), and availability of post-tension product (10 purchasers).¹⁴

¹⁴ The importance of the availability of pre-tension product and post-tension product was split based on the need of the purchaser. No purchaser reported being both a pre-tension end user and post-tension end user. There were 11 post-tension end users, and 10 purchasers that reported the availability of post-tension product as very important. There were 5 pre-tension end users, and 5 purchasers that reported the availability of pre-tension product as very important.

Table II-9**PC strand: Importance of purchase factors, as reported by U.S. purchasers, by factor**

Factor	Very important	Somewhat important	Not important
Price	18	---	---
Availability	16	2	---
Product consistency	16	2	---
Reliability of supply	16	2	---
Quality meets industry standards	15	2	---
Delivery time	11	7	---
Availability of post-tension product	10	2	5
Delivery terms	9	9	---
Quality exceeds industry standards	8	9	1
Payment terms	8	8	2
Discounts offered	8	7	3
U.S. transportation costs	6	8	3
Availability of pre-tension product	5	2	9
Packaging	4	12	1
Technical support/service	4	11	2
Minimum quantity requirements	4	7	7
Product range	2	10	5

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

When asked to identify characteristics that determine quality, 11 noted meeting firm specifications, mill certification requirements, or the ASTM A416 specification. Four replied that the plant must be PTI certified. Product characteristics mentioned included minimal-to-non-existent wire failures, no kinks in the strand, packaged well, smooth running, strength, and strand behavior in testing.

Supplier certification

Seven of 17 responding purchasers require their suppliers to become certified or qualified to sell PC strand to their firm. Purchasers reported that the time to qualify a new supplier ranged from 10 to 120 days. Three require plant certification by the Post-Tension Institute, two require ASTM compliance, one requires “industry certifications,” one requires strength certification on all shipments, and one reported using a financial background check. No purchaser reported that any domestic or foreign supplier had failed in its attempt to qualify PC strand, or had lost its approved status since 2017.

Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2017. Changes in purchasers' purchasing patterns are presented in table II-10. Purchase patterns among countries were mixed. A plurality of purchasers noted either increasing or constant purchases from domestic sources. Pluralities or majorities with multiple purchasers noting increased purchases included Colombia, Indonesia, Spain, and Turkey. Pluralities or majorities with multiple purchasers noting decreased purchases included Italy, South Africa, and the UAE.

Table II-10
PC strand: Changes in purchasing patterns since January 1, 2017

Source	Increase	Constant	Decrease	Fluctuate
United States	6	6	4	2
Subject sources:				
Argentina	---	1	---	1
Colombia	4	---	1	1
Egypt	---	---	---	---
Indonesia	3	2	---	1
Italy	2	2	3	---
Malaysia	2	3	1	4
Netherlands	1	---	---	1
Saudi Arabia	---	1	---	2
South Africa	1	1	3	---
Spain	3	3	---	---
Taiwan	---	1	---	1
Tunisia	2	3	2	1
Turkey	3	1	1	2
Ukraine	1	1	---	---
UAE	---	1	3	1
Nonsubject sources	2	---	1	4
Unknown sources	---	1	---	---

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

Purchasers were also asked about whether they had changed suppliers since January 1, 2017; 5 of 17 responding purchasers reported that they had. Specifically, three domestic producers (Bekaert, Sumiden, and WMC) and one importer (CRP) were added by one purchaser each. The final purchaser noted that suppliers “come and go on a quarterly basis due to price.” Only *** supplied a reason – it added Sumiden because importer Westco was unable to fulfill orders.

Eleven purchasers reported that none of their purchases required purchasing U.S.-produced product. Six purchasers reported that domestic product was required by law (encompassing 10 percent of total reported purchases). Four of the six noted that it was required for more than 50 percent of their purchases in 2019. Two purchasers reported it was required by their customers and one reported it was required for another reason (its own company's policy). These purchases each made up *** percent of reported purchases in 2019. A number of federal transportation projects fall under the requirements of the Buy America Act, which requires that domestic PC strand (along with other projects) be used in their completion.

Comparisons of domestic products, subject imports, and nonsubject imports

Purchasers were asked a number of questions comparing PC strand produced in the United States and subject countries. First, purchasers were asked for a country-by-country comparison on the same 17 factors (table II-11) for which they were asked to rate the importance.

Most purchasers reported that U.S. and subject PC strand were comparable on all factors. PC strand produced in the United States was considered to have inferior prices to Tunisia and Ukraine by a plurality of purchasers. Besides these two comparisons, at least as many purchasers considered the United States and each subject country to be comparable on each factor as to be superior or inferior. Multiple purchasers infrequently considered product from the United States to be superior or inferior on any factor – in only 14 of 255 comparisons across all subject countries. Seven of these were in price comparisons, six in U.S. transportation cost comparisons, and one in product consistency.

Table II-11

PC strand: Purchasers' comparisons between U.S.-produced and imported product

Factor	U.S. vs. Argentina			U.S. vs. Colombia			U.S. vs. Egypt		
	S	C	I	S	C	I	S	C	I
Availability	---	3	---	---	6	---	---	1	---
Availability of post-tension product	---	3	---	---	5	---	---	1	---
Availability of pre-tension product	---	2	---	---	4	---	---	---	---
Delivery terms	---	3	---	---	6	---	---	1	---
Delivery time	---	3	---	---	6	1	---	1	---
Discounts offered	---	3	---	---	5	---	---	1	---
Minimum quantity requirements	---	3	---	---	6	1	---	1	---
Packaging	---	3	---	1	6	---	---	1	---
Payment terms	---	3	---	---	6	1	---	1	---
Price	---	3	---	1	4	2	---	1	---
Product consistency	1	2	---	---	6	---	---	1	---
Product range	1	2	---	1	4	1	---	1	---
Quality meets industry standards	---	3	---	---	7	---	---	1	---
Quality exceeds industry standards	---	3	---	---	4	---	---	1	---
Reliability of supply	---	3	---	---	6	1	---	1	---
Technical support/service	1	2	---	1	5	---	---	1	---
U.S. transportation costs	1	2	---	1	5	---	---	1	---
Factor	U.S. vs. Indonesia			U.S. vs. Italy			U.S. vs. Malaysia		
	S	C	I	S	C	I	S	C	I
Availability	---	7	---	---	9	---	---	10	---
Availability of post-tension product	---	7	---	---	8	---	1	9	---
Availability of pre-tension product	---	4	---	---	6	---	---	5	---
Delivery terms	---	7	---	---	9	---	---	9	1
Delivery time	---	7	---	---	9	---	---	7	1
Discounts offered	---	5	---	1	5	---	---	7	---
Minimum quantity requirements	---	6	---	---	8	---	---	8	1
Packaging	---	7	---	---	8	---	1	9	---
Payment terms	---	7	---	---	9	---	---	10	---
Price	1	3	3	2	5	2	1	4	4
Product consistency	1	6	---	1	8	---	2	8	---
Product range	1	4	---	1	7	---	1	6	1
Quality meets industry standards	---	7	---	---	9	---	---	10	---
Quality exceeds industry standards	---	5	---	---	7	---	---	6	---
Reliability of supply	---	7	---	---	9	---	1	8	1
Technical support/service	1	5	---	1	8	---	1	6	1
U.S. transportation costs	2	3	---	1	7	---	3	5	---

Table continued on next page.

Table II-11--Continued

PC strand: Purchasers' comparisons between U.S.-produced and imported product

Factor	U.S. vs. Netherlands			U.S. vs. Saudi Arabia			U.S. vs. South Africa		
	S	C	I	S	C	I	S	C	I
Availability	---	3	---	---	3	1	---	5	---
Availability of post-tension product	---	3	---	---	3	1	---	5	---
Availability of pre-tension product	---	2	---	---	1	---	---	3	---
Delivery terms	---	3	---	---	4	---	---	5	---
Delivery time	---	3	---	---	3	1	---	5	---
Discounts offered	1	2	---	1	1	---	1	4	---
Minimum quantity requirements	---	2	---	---	2	1	---	4	---
Packaging	---	2	---	1	2	---	---	4	---
Payment terms	---	3	---	---	3	1	---	5	---
Price	1	2	---	1	1	1	1	3	1
Product consistency	---	3	---	---	4	---	---	5	---
Product range	1	1	---	---	1	1	---	3	---
Quality meets industry standards	---	2	---	---	3	---	---	4	---
Quality exceeds industry standards	---	2	---	---	1	---	---	4	---
Reliability of supply	---	3	---	---	3	1	---	5	---
Technical support/service	1	2	---	---	3	1	1	4	---
U.S. transportation costs	2	1	---	1	2	---	2	3	---
Factor	U.S. vs. Spain			U.S. vs. Taiwan			U.S. vs. Tunisia		
	S	C	I	S	C	I	S	C	I
Availability	---	7	---	---	3	---	---	7	1
Availability of post-tension product	---	6	---	---	3	---	---	7	1
Availability of pre-tension product	---	4	---	---	3	---	---	5	---
Delivery terms	1	6	---	---	3	---	---	8	---
Delivery time	1	6	---	---	3	---	---	6	1
Discounts offered	1	3	1	---	3	---	---	6	---
Minimum quantity requirements	---	6	---	---	3	---	---	7	1
Packaging	1	6	---	---	3	---	1	7	---
Payment terms	1	5	1	---	3	---	---	8	---
Price	2	3	1	---	3	---	1	2	3
Product consistency	1	6	---	---	3	---	---	8	---
Product range	1	6	---	---	3	---	---	6	1
Quality meets industry standards	---	7	---	---	3	---	---	8	---
Quality exceeds industry standards	---	4	---	---	3	---	---	6	---
Reliability of supply	---	6	---	---	3	---	---	7	1
Technical support/service	1	6	---	1	2	---	1	6	1
U.S. transportation costs	2	4	---	1	2	---	2	5	---

Table continued on next page.

Table II-11--Continued

PC strand: Purchasers' comparisons between U.S.-produced and imported product

Factor	U.S. vs. Turkey			U.S. vs. Ukraine			U.S. vs. UAE		
	S	C	I	S	C	I	S	C	I
Availability	---	8	---	---	1	---	1	2	1
Availability of post-tension product	---	8	---	---	1	---	---	2	1
Availability of pre-tension product	---	5	---	---	---	---	---	2	---
Delivery terms	---	8	---	---	1	---	1	3	---
Delivery time	---	6	1	---	1	---	1	1	1
Discounts offered	---	6	---	---	1	---	---	2	---
Minimum quantity requirements	---	8	---	---	1	---	---	3	1
Packaging	1	7	---	---	1	---	1	3	---
Payment terms	---	8	---	---	1	---	---	2	2
Price	1	4	2	---	---	1	---	2	1
Product consistency	1	7	---	---	1	---	---	3	1
Product range	1	5	---	---	1	---	---	2	1
Quality meets industry standards	---	8	---	---	1	---	---	4	---
Quality exceeds industry standards	---	6	---	---	1	---	---	2	---
Reliability of supply	---	8	---	---	1	---	1	2	1
Technical support/service	1	7	---	---	1	---	---	3	1
U.S. transportation costs	1	6	---	---	1	---	---	3	---

Note: A rating of superior means that price/U.S. transportation cost is generally lower. For example, if a firm reported "U.S. superior," it meant that the U.S. product was generally priced lower than the imported product.

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

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

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, importers, and purchasers were asked whether the products can always, frequently, sometimes, or never be used interchangeably. As shown in table II-12, most responding producers and purchasers considered PC strand from the United States to always be interchangeable with that imported from subject countries. Importers' responses were somewhat more mixed, but a majority or plurality of importers considered the two to be always interchangeable for 11 of the 15 subject countries. Purchaser *** added that interchangeability in its market "is strongly dependent on whether {the} job is Buy America or not, imports cannot be used on Federally-funded infrastructure work."

Table II-12
PC strand: Interchangeability between PC strand produced in the United States and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. Argentina	4	---	---	---	***	***	***	***	6	---	---	---
United States vs. Colombia	4	---	---	---	***	***	***	***	8	2	---	---
United States vs. Egypt	4	---	---	---	***	***	***	***	4	---	---	---
United States vs. Indonesia	4	---	---	---	***	***	***	***	7	1	---	---
United States vs. Italy	4	---	---	---	***	***	***	***	8	3	---	---
United States vs. Malaysia	4	---	---	---	***	***	***	***	9	2	---	---
United States vs. Netherlands	4	---	---	---	***	***	***	***	5	1	---	---
United States vs. Saudi Arabia	4	---	---	---	***	***	***	***	5	1	---	---
United States vs. South Africa	4	---	---	---	***	***	***	***	6	2	---	---
United States vs. Spain	4	---	---	---	***	***	***	***	6	3	---	---
United States vs. Taiwan	4	---	---	---	***	***	***	***	6	---	---	---
United States vs. Tunisia	4	---	---	---	***	***	***	***	9	2	---	---
United States vs. Turkey	4	---	---	---	***	***	***	***	9	2	---	---
United States vs. Ukraine	4	---	---	---	***	***	***	***	4	---	---	---
United States vs. UAE	4	---	---	---	***	***	***	***	4	1	---	---
United States vs. all other sources	4	---	---	---	***	***	***	***	4	1	---	---

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

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

Firms were also asked to compare the interchangeability of PC strand between subject countries. Results are presented in appendix E. Generally, the responses are similar to those in comparing U.S. PC strand to that imported from subject countries: all producers and most or all purchasers noting product is always interchangeable, and importers giving more mixed responses.

As can be seen from table II-13, a majority of responding purchasers reported that domestically produced product and product imported from subject countries “always” met minimum quality specifications. An equal number of purchasers noted that PC strand imported from Spain and from all other sources either “usually” or “always” met minimum quality specifications. All four responding purchasers indicated that PC strand imported from the UAE “usually” meets specifications.

Table II-13
PC strand: Ability to meet minimum quality specifications, by source

Source	Always	Usually	Sometimes	Rarely or never
United States	15	3	---	---
Argentina	3	---	---	---
Colombia	4	2	---	---
Egypt	1	---	---	---
Indonesia	3	1	---	---
Italy	5	3	---	---
Malaysia	7	3	---	---
Netherlands	2	---	---	---
Saudi Arabia	2	1	---	---
South Africa	4	1	---	---
Spain	3	3	---	---
Taiwan	4	---	---	---
Tunisia	6	2	---	---
Turkey	5	3	---	---
Ukraine	1	---	---	---
UAE	---	4	---	---
All other sources	2	2	---	---

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

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

In addition, U.S. producers, importers, and purchasers were asked to assess how often differences other than price were significant in sales of PC strand from the United States, subject, or nonsubject countries. As seen in table II-14, all responding producers noted there are “never” any factors other than price that are important to selling PC strand. In contrast, only *** in *** comparisons noted that there are “never” any factors other than price that are important to selling PC strand. In fact, in 9 of the 15 comparisons with subject countries, importers stated there are “always” factors other than price that are important; two importers each noted this with respect to U.S. PC strand to that from Saudi Arabia, Spain, and Turkey. Importer *** pointed to differences in the quality of product and the timeliness of delivery, while importer *** stated that the quality of wire rod and the mechanical properties’ accuracy are important factors. Purchasers’ responses were between more mixed, but most purchasers noted there are “never” differences for most comparisons. Purchaser *** stated some of its customers prefer domestic product because of “modular elasticity” which is more consistent in PC strand produced domestically and they prefer the elongations that they get with domestic materials when stressing cables. Non-price factor comparisons between subject countries and with nonsubject countries are shown in appendix E.

Table II-14

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	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
United States vs. Argentina	---	---	---	4	***	***	***	***	1	---	1	2
United States vs. Colombia	---	---	---	4	***	***	***	***	---	1	2	4
United States vs. Egypt	---	---	---	4	***	***	***	***	1	---	---	2
United States vs. Indonesia	---	---	---	4	***	***	***	***	---	---	1	5
United States vs. Italy	---	---	---	4	***	***	***	***	1	1	5	3
United States vs. Malaysia	---	---	---	4	***	***	***	***	1	1	3	5
United States vs. Netherlands	---	---	---	4	***	***	***	***	1	---	1	2
United States vs. Saudi Arabia	---	---	---	4	***	***	***	***	---	---	3	3
United States vs. South Africa	---	---	---	4	***	***	***	***	---	1	2	3
United States vs. Spain	---	---	---	4	***	***	***	***	---	1	5	2
United States vs. Taiwan	---	---	---	4	***	***	***	***	1	---	---	3
United States vs. Tunisia	---	---	---	4	***	***	***	***	---	1	3	5
United States vs. Turkey	---	---	---	4	***	***	***	***	1	1	3	4
United States vs. Ukraine	---	---	---	4	***	***	***	***	---	---	---	3
United States vs. UAE	---	---	---	4	***	***	***	***	---	1	3	2
United States vs. all other sources	---	---	---	4	***	***	***	***	---	1	1	2

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

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

Elasticity estimates

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

U.S. supply elasticity

The domestic supply elasticity for PC strand measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of PC strand. The elasticity of domestic supply depends on several factors including the level of excess capacity, the ease with which producers can alter capacity, producers' ability to shift to production of other products, the existence of inventories, and the availability of alternate markets for U.S.-produced PC strand. Analysis of these factors above indicates that the U.S. industry has the ability to greatly increase or decrease shipments to the U.S. market; an estimate in the range of 5 to 7 is suggested.

U.S. demand elasticity

The U.S. demand elasticity for PC strand measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of PC strand. This estimate depends on factors discussed above such as the existence, availability, and commercial viability of substitute products, as well as the component share of the PC strand in the production of any downstream products. Based on the available information, the aggregate demand for PC strand is likely to be highly inelastic; a range of -0.25 to -0.5 is suggested.

Substitution elasticity

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.¹⁵ Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, for jobs where imports are not precluded from being used due to Buy America restrictions, the elasticity of substitution between U.S.-produced PC strand and imported PC strand is likely to be in the range of 3 to 6.

¹⁵ The substitution elasticity measures the responsiveness of the relative U.S. consumption levels of the subject imports and the domestic like products to changes in their relative prices. This reflects how easily purchasers switch from the U.S. product to the subject products (or vice versa) when prices change.

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

The Commission analyzes a number of factors in making injury determinations (see 19 U.S.C. §§ 1677(7)(B) and 1677(7)(C)). Information on the subsidies and dumping margins 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 all or nearly all 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.¹ 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.

Table III-1
PC strand: U.S. producers of PC strand, their positions on the petition, production locations, and shares of reported production, 2019

Firm	Position on petition	Production location(s)	Share of production (percent)
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.

¹ The Commission did not issue a U.S. producer questionnaire to ***, but it submitted a questionnaire response.

Table III-2

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

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

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

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 th , 2017, Sumiden began production operations at its greenfield PC strand plant in Dayton, TX. ¹
Plant opening	Liberty	On June 25 th , 2018, Liberty restarted wire rod production operations at its Georgetown, SC plant, which had been idled for the previous three years. ²
Expansion	WMC	On November 6 th , 2017, WMC announced plans to install a new pickling line and eight drawing machines for PC strand at its plant in St. Matthews, SC. ³
Expansion	WMC	On March 20 th , 2018, WMC announced plans to add a new PC strand line to its plant in Conroe, TX. ⁴
Acquisition	WMC	On April 2 nd , 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. ⁵
Acquisition	Insteel	On March 17 th , 2020, Insteel announced its acquisition of Strand-Tech Manufacturing, Inc. ⁶

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
Plant openings:	
***	***
Plant closings:	
***	***
***	***
Relocations:	
***	***
Expansions:	
***	***
Acquisitions:	
***	***
***	***
Prolonged shutdowns or curtailments:	
***	***
***	***
Other:	
***	***

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, January-September 2019, and January-September 2020. ***.² Total capacity increased by 9.3 percent during 2017-19, but [remained unchanged] during January-September 2019 and January-September 2020. Total production, fluctuated, decreased by 6.4 percent from 2017 to 2019, but was 15.8 percent higher during January-September 2020 than during January-September 2019.³ Capacity utilization, fluctuated, decreased by 9.8 percentage points from 2017 to 2019, but was 9.3 percentage points higher than during January-September 2020 than January-September 2019. From 2017 to 2019, ***.⁴ Petitioners indicated that during 2019 more than 40 percent of the domestic industry's capacity was unused.⁵ In early 2020,

² ***.

In December 2018, ***. Insteel closed the Liberty Strand Tech facility and is in the process of moving the PC strand production equipment to its other facilities located in Florida, Tennessee, and Texas. ***'s U.S. producer questionnaires, section II-2.

³ From 2017 to 2019, ***.

⁴ ***.

⁵ Hearing transcript, p. 44 (Cannon).

Insteel acquired the Strand-Tech Manufacturing facility in Somerville, South Carolina. Insteel eventually closed the plant and it is relocating the production equipment to its other facilities.⁶

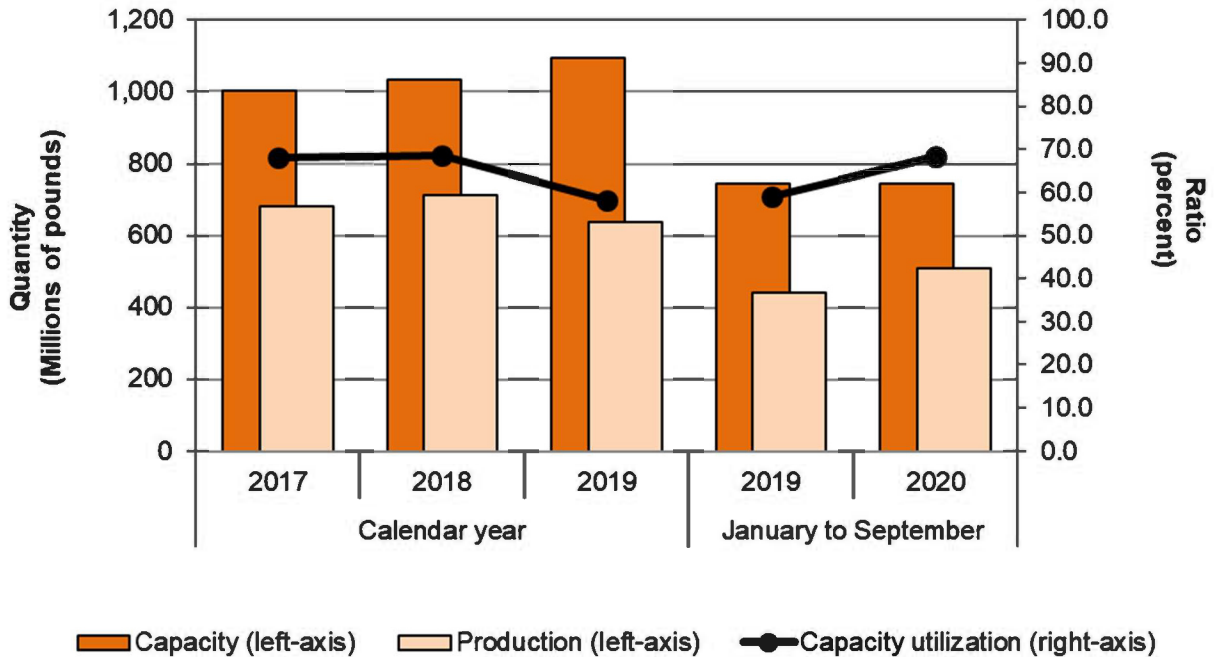
⁶ Hearing transcript, p. 20 (Woltz).

Table III-5
PC strand: U.S. producers' production, capacity, and capacity utilization, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Capacity (1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	1,001,930	1,035,415	1,095,415	746,555	746,555
	Production (1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	682,215	711,687	638,869	440,526	510,059
	Capacity utilization (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	68.1	68.7	58.3	59.0	68.3
	Share of production (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	100.0	100.0	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, January-September 2019, and January-September 2020



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

Alternative products

As shown in table III-6, approximately *** percent of the product produced during 2017-19, January-September 2019, and January-September 2020 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 2017-19.⁷ *** out-of-scope production of products for the energy and agricultural sectors accounted for at least *** of total production in every year, during 2017-19, and at least *** percent of out-of-scope production during January-September 2019 and January-September 2020. ***.⁸

⁷ *** U.S. producer questionnaire response, section II-3a.

⁸ *** 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, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Overall capacity	***	***	***	***	***
Production: PC strand	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
Overall capacity utilization	***	***	***	***	***
Share of production: PC strand	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	100.0	100.0	100.0	100.0	100.0

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, January-September 2019, and January-September 2020. From 2017 to 2019, the quantity of U.S. shipments decreased by *** percent, while U.S. shipments were higher during January-September 2020 than during January-September 2019 by *** percent. During 2017-19, the value of U.S. shipments increased by *** percent and were higher by *** percent during January-September 2020 than during January-September 2019. The unit values for U.S. shipments increased by *** percent during 2017-19, but were lower by *** percent during January-September 2020 than during January-September 2019. From 2017 to 2019, U.S. producers' export shipments were *** and decreased by *** percent based on both quantity and value. Export shipment unit values increased by *** percent during 2017-19, but were lower by *** percent during January-September 2020 than during January-September 2019. *** were the only firms that exported PC strand during 2017-19.

Table III-7

PC strand: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	673,152	705,013	645,796	452,331	506,442
	Value (1,000 dollars)				
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	295,030	362,093	321,734	227,946	237,776
	Unit value (dollars per 1,000 pounds)				
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	438	514	498	504	470
	Share of quantity (percent)				
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	100.0	100.0	100.0	100.0	100.0
	Share of value (percent)				
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	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: 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, January-September 2019, and January-September 2020. These data show that U.S. producers' inventories fluctuated and increased by *** percent during 2017-19, and were higher by *** percent during January-September 2020 than during January-September 2019.⁹ The ratios of inventories to production, U.S. shipments, and total shipments all consistently ranged between *** during 2017-19 and *** during January to September 2019 and January to September 2020.

⁹ 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, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. producers' end-of-period inventories	71,654	79,428	72,900	63,425	63,485
	Ratio (percent)				
Ratio of inventories to.-- U.S. production	10.5	11.2	11.4	10.8	9.3
U.S. shipments	***	***	***	***	***
Total shipments	10.6	11.3	11.3	10.5	9.4

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

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

U.S. producers' imports and purchases

During 2017-19, January to September 2019, and January to September 2020, none of the five U.S. producers reported imports or purchases 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, January-September 2019, and January-September 2020. 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.¹⁰ PRWs and hours worked were higher during January-September 2020 than during January-September 2019. Unit labor costs (dollars per thousand pounds) increased by more than two dollars (\$2.24) from 2017 to 2019, but were lower during January-September 2020 than during January-September 2019.

¹⁰ Insteel indicated that shortly after it had acquired (in December 2018) the Strand-Tech facility located in Summerville, SC that it had to lay off 42 employees and close the plant. Hearing transcript, p. 24 (Woltz).

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, January-September 2019, and January-September 2020**

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	411	398	378	331	373
Total hours worked (1,000 hours)	953	973	886	619	663
Hours worked per PRW (hours)	2,319	2,445	2,344	1,870	1,777
Wages paid (\$1,000)	19,203	20,634	19,413	13,464	15,126
Hourly wages (dollars per hour)	\$20.15	\$21.21	\$21.91	\$21.75	\$22.81
Productivity (pounds per hour)	715.9	731.4	721.1	711.7	769.3
Unit labor costs (dollars per 1,000 pounds)	\$28.15	\$28.99	\$30.39	\$30.56	\$29.66

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 35 firms believed to be importers of subject PC strand, as well as to all U.S. producers of PC strand.¹ Usable questionnaire responses were received from twelve companies, representing the following percentage of imports from individual subject countries in 2019.²

- 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
- 92.4 percent of U.S. imports from Italy
- 101.5 percent of U.S. imports from Malaysia
- 0 percent of U.S. imports from Netherlands³
- 81.9 percent of U.S. imports from Saudi Arabia
- 90.8 percent of U.S. imports from South Africa
- 18.5 percent of U.S. imports from Spain
- 108.3 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
- 44.6 percent of U.S. imports from UAE

¹ 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 imports under HTS statistical reporting numbers identified in the scope.

² 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. The quantity of U.S. imports of PC strand from the combined subject countries in 2019 accounted for 87.4 percent during 2019, and 90.1 percent of total imports of PC strand during 2019.

³ *** Nedri Spanstaal foreign producer questionnaire section, I-7.

U.S. import quantities and values presented in this report are derived from official U.S. import statistics using HTS statistical reporting numbers 7312.10.3010 and 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, 2019

Firm	Headquarters	Share of imports by source (percent)		
		Subject Sources	Nonsubject Sources	All import sources
A.G. Royce	Sunrise, FL	***	***	***
Amsysco	Romeoville, IL	***	***	***
Athanor	Houston, TX	***	***	***
Intermetal	Miami, FL	***	***	***
Kiswire	Norcross, GA	***	***	***
Mid-State	Cranbury, NJ	***	***	***
Philadelphia Post	Tucker, GA	***	***	***
PTE	Hialeah, FL	***	***	***
Siam	Rayong,	***	***	***
Tata Steel	Schaumburg, IL	***	***	***
TIMAL	Schaumburg, IL	***	***	***
Westco	San Francisco, CA	***	***	***
All firms		100.0	100.0	100.0

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 during 2017-19, January-September 2019, and January-September 2020. 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, but were lower during January to September 2020 than during January to September 2019. During 2017-19, U.S. imports of PC strand from nonsubject sources decreased by *** percent by quantity, and decreased by *** percent by value, but were higher during January-September 2020 than during January to September 2019. The largest nonsubject source of U.S. imports of PC strand during 2017-19 and the interim periods of January-September 2019 and 2020 was Portugal.⁴

⁴ According to Official imports statistics, Portugal accounted for the vast majority of all nonsubject imports.

Average unit values of U.S. imports from subject sources increased by 17.0 percent from 2017 to 2019, but were lower by 15.3 percent during January-September 2020 than during January-September 2019. Average unit values of U.S. imports from nonsubject sources increased by *** percent, but were *** percent lower during January-September 2020 than during January to September 2019. Overall, the increase in average unit values from all import sources was *** percent during 2017-19, but were lower by *** percent during January to September 2020 than during January to September 2019.

Malaysia and Spain were the largest sources of subject U.S. imports of PC strand, accounting, respectively, 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 accounted for *** percent by quantity in 2019.

U.S. imports of PC strand as a ratio to U.S. production increased by *** percentage points for subject sources and decreased by *** percentage points for nonsubject sources from 2017 to 2019, but were lower by *** percentage points for subject sources and higher by *** percentage points for nonsubject sources, during January to September 2020 than during January to September 2019 . Overall, the ratio of total U.S. imports of PC strand to U.S. production increased by *** percentage points from 2017 to 2019, but were lower by *** percentage points during January to September 2020 than during January to September 2019.

Table IV-2
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. imports from.--					
Argentina	---	2,196	6,125	6,125	230
Colombia	26,649	24,241	23,840	18,644	8,875
Egypt	---	---	968	409	2,807
Indonesia	634	10,350	13,890	11,655	4,474
Italy	21,227	14,819	24,305	21,209	26,576
Malaysia	70,651	68,456	67,779	52,724	31,598
Netherlands	3,133	1,978	2,888	2,227	1,532
Saudi Arabia	7,732	18,591	3,647	2,792	9,836
South Africa	20,422	20,367	17,905	11,841	15,848
Spain	26,609	15,852	41,812	33,517	36,406
Taiwan	2,589	10,676	6,288	5,400	6,416
Tunisia	22,991	25,373	25,173	24,091	7,007
Turkey	30,378	27,889	35,971	24,943	25,335
Ukraine	529	4,385	2,796	1,848	1,707
UAE	4,542	612	6,884	6,884	---
Subject sources	238,086	245,786	280,272	224,310	178,648
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
U.S. imports from.--					
Argentina	---	1,083	2,599	2,599	89
Colombia	9,156	10,594	9,846	7,868	3,127
Egypt	---	---	372	173	889
Indonesia	213	4,416	5,380	4,578	1,344
Italy	7,379	7,382	10,984	9,707	9,974
Malaysia	23,838	30,263	27,129	21,630	10,576
Netherlands	1,907	1,300	1,800	1,413	872
Saudi Arabia	2,575	7,698	1,422	1,117	3,084
South Africa	7,023	9,063	7,490	5,170	5,681
Spain	9,437	7,703	16,501	13,507	12,539
Taiwan	1,014	5,092	3,056	2,683	2,427
Tunisia	7,683	10,967	9,900	9,546	2,252
Turkey	10,580	12,603	14,311	10,040	9,429
Ukraine	187	1,836	987	672	524
UAE	1,891	250	2,359	2,359	---
Subject sources	82,884	110,251	114,134	93,061	62,807
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit value (dollars per 1,000 pounds)				
U.S. imports from.--					
Argentina	---	493	424	424	388
Colombia	344	437	413	422	352
Egypt	---	---	384	423	317
Indonesia	336	427	387	393	300
Italy	348	498	452	458	375
Malaysia	337	442	400	410	335
Netherlands	609	657	623	634	570
Saudi Arabia	333	414	390	400	314
South Africa	344	445	418	437	358
Spain	355	486	395	403	344
Taiwan	392	477	486	497	378
Tunisia	334	432	393	396	321
Turkey	348	452	398	403	372
Ukraine	353	419	353	364	307
United Arab Emirates	416	408	343	343	---
Subject sources	348	449	407	415	352
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table IV-2--Continued
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of quantity (percent)				
U.S. imports from.--					
Argentina	---	0.8	2.0	2.4	0.1
Colombia	9.5	8.5	7.6	7.4	3.5
Egypt	---	---	0.3	0.2	1.1
Indonesia	0.2	3.6	4.4	4.7	1.8
Italy	7.6	5.2	7.8	8.5	10.4
Malaysia	25.2	24.0	21.6	21.0	12.4
Netherlands	1.1	0.7	0.9	0.9	0.6
Saudi Arabia	2.8	6.5	1.2	1.1	3.9
South Africa	7.3	7.1	5.7	4.7	6.2
Spain	9.5	5.6	13.3	13.4	14.3
Taiwan	0.9	3.7	2.0	2.2	2.5
Tunisia	8.2	8.9	8.0	9.6	2.7
Turkey	10.8	9.8	11.5	10.0	9.9
Ukraine	0.2	1.5	0.9	0.7	0.7
UAE	1.6	0.2	2.2	2.7	---
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2--Continued
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of value (percent)				
U.S. imports from.--					
Argentina	---	0.8	2.0	2.5	0.1
Colombia	9.3	8.2	7.6	7.5	3.4
Egypt	---	---	0.3	0.2	1.0
Indonesia	0.2	3.4	4.2	4.4	1.5
Italy	7.5	5.7	8.5	9.2	10.9
Malaysia	24.2	23.4	21.0	20.6	11.5
Netherlands	1.9	1.0	1.4	1.3	1.0
Saudi Arabia	2.6	5.9	1.1	1.1	3.4
South Africa	7.1	7.0	5.8	4.9	6.2
Spain	9.6	5.9	12.8	12.9	13.7
Taiwan	1.0	3.9	2.4	2.6	2.6
Tunisia	7.8	8.5	7.7	9.1	2.5
Turkey	10.7	9.7	11.1	9.6	10.3
Ukraine	0.2	1.4	0.8	0.6	0.6
UAE	1.9	0.2	1.8	2.2	---
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2--Continued
PC Strand: U.S. imports by source, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio to U.S. production				
U.S. imports from.--					
Argentina	---	0.3	1.0	1.4	0.0
Colombia	3.9	3.4	3.7	4.2	1.7
Egypt	---	---	0.2	0.1	0.6
Indonesia	0.1	1.5	2.2	2.6	0.9
Italy	3.1	2.1	3.8	4.8	5.2
Malaysia	10.4	9.6	10.6	12.0	6.2
Netherlands	0.5	0.3	0.5	0.5	0.3
Saudi Arabia	1.1	2.6	0.6	0.6	1.9
South Africa	3.0	2.9	2.8	2.7	3.1
Spain	3.9	2.2	6.5	7.6	7.1
Taiwan	0.4	1.5	1.0	1.2	1.3
Tunisia	3.4	3.6	3.9	5.5	1.4
Turkey	4.5	3.9	5.6	5.7	5.0
Ukraine	0.1	0.6	0.4	0.4	0.3
UAE	0.7	0.1	1.1	1.6	---
Subject sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012, accessed November 5, 2020.

Figure IV-1
PC strand: U.S. import quantities and average unit values, 2017-19, January-September 2019, and
January-September 2020

* * * * *

Critical circumstances

On December 11, 2020, Commerce issued its final antidumping determinations⁵ that “critical circumstances” exist with regard to imports of PC strand from Colombia, Egypt, Netherlands, and Turkey for imports of PC strand exported by (1) Knight SAS from Colombia; (2) United Wires Company Elsewedy and all other producers/exporters from Egypt; (3) Nedri Spanstaal BV from the Netherlands; and (4) Güney Celik and all other producers/exporters from Turkey.⁶ Commerce has not made a final antidumping determination that critical circumstances exist with regard to imports of PC strand from Indonesia.

In these investigations, if both Commerce and the Commission make affirmative final critical circumstances determinations, certain subject imports may be subject to antidumping duties retroactive by 90 days from September 23, 2020, the effective date of Commerce’s preliminary affirmative AD determinations for Colombia, Egypt, Netherlands, and Turkey. Table IV-3 and figure IV-2 present data for certain U.S. imports of PC strand from Colombia, November 2019 to October 2020. Table IV-4 and figure IV-3 present data for certain U.S. imports of PC strand from Egypt, November 2019 to October 2020. Table IV-5 and figure IV-4 present data for certain U.S. imports of PC strand from Indonesia, November 2019 to October 2020. Table IV-6 and figure IV-5 present data for certain U.S. imports of PC strand from the Netherlands, November 2019 to October 2020. Table IV-7 and figure IV-6 present data for antidumping duty critical circumstances for certain U.S. imports of PC strand from Turkey, November 2019 to October 2020.

⁵ 85 FR 80001, December 11, 2020.

⁶ On December 11, 2020, Commerce issued its final negative countervailing determination that “critical circumstances” exist with regard to imports of PC strand from Turkey for Celik Halat ve Tel San A.S. (Celik Halat). 85 FR 80005, December 11, 2020.

Commerce made final AD determinations for certain U.S. imports from Turkey and determined that critical circumstances exist for Güney Celik and all others, while critical circumstances do not exist for Celik Halat. 85 FR 80001, December 11, 2020.

Table IV-3

PC strand: U.S. imports subject to Commerce’s final AD critical circumstances determinations for certain U.S. imports from Colombia, November 2019 to October 2020

Month	Actual monthly quantity (1,000 pounds)	Outwardly cumulative subtotals (1,000 pounds)	Percentage change from comparable period (percent)
2019.-- November	***	***	
December	***	***	
2020.-- January	***	***	
February	***	***	
March	***	***	
April	***	***	
Petition file date: April 16, 2020			
May	***	***	▲58.7
June	***	***	▲114.4
July	***	***	▲3.4
August	***	***	▲20.3
September	***	***	▲11.3
October	***	***	▼(11.6)

Note: The percent increase or (decrease) over the comparable pre-petition period.

Note: U.S. imports include imports from Colombia from all suppliers during critical circumstance period.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed December 17, 2020.

Figure IV-2

PC strand: U.S. imports subject to Commerce's final AD critical circumstances determinations for certain U.S. imports from Colombia, November 2019 to October 2020

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Table IV-4**PC strand: U.S. imports subject to Commerce's final AD critical circumstances determinations for certain U.S. imports from Egypt, November 2019 to October 2020**

Month	Actual monthly quantity (1,000 pounds)	Outwardly cumulative subtotals (1,000 pounds)	Percentage change from comparable period (percent)
2019.--			
November	***	***	
December	***	***	
2020.--			
January	***	***	
February	***	***	
March	***	***	
April	***	***	
Petition file date: April 16, 2020			
May	***	***	---
June	***	***	▲250.6
July	***	***	▲250.6
August	***	***	▲250.6
September	***	***	▲102.6
October	***	***	▲102.6

Note: The percent increase or (decrease) over the comparable pre-petition period.

Note: U.S. imports include imports from Egypt from all suppliers during critical circumstance period.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed December 17, 2020.

Figure IV-3

PC strand: U.S. imports subject to Commerce's final AD critical circumstances determinations for certain U.S. imports from Egypt, November 2019 to October 2020

* * * * *

Table IV-5

PC strand: U.S. imports subject to Commerce’s preliminary AD critical circumstances determinations for certain U.S. imports from Indonesia, November 2019 to October 2020

Month	Actual monthly quantity (1,000 pounds)	Outwardly cumulative subtotals (1,000 pounds)	Percentage change from comparable period (percent)
2019.--			
November	***	***	
December	***	***	
2020.--			
January	***	***	
February	***	***	
March	***	***	
April	***	***	
Petition file date: April 16, 2020			
May	***	***	---
June	***	***	---
July	***	***	---
August	***	***	▲ 1,010.5
September	***	***	▲ 459.0
October	***	***	▲ 124.4

Note: The percent increase or (decrease) over the comparable pre-petition period.

Note: U.S. imports include imports from Indonesia from all suppliers during critical circumstance period.

Commerce will make a separate final AD determination for critical circumstances regarding Indonesia.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed December 17, 2020.

Figure IV-4
PC strand: U.S. imports subject to Commerce’s preliminary AD critical circumstances
determinations for certain U.S. imports from Indonesia, November 2019 to October 2020

* * * * *

Table IV-6

PC strand: U.S. imports subject to Commerce’s final AD critical circumstances determinations for certain U.S. imports from Netherlands, November 2019 to October 2020

Month	Actual monthly quantity (1,000 pounds)	Outwardly cumulative subtotals (1,000 pounds)	Percentage change from comparable period (percent)
2019.-- November	***	***	
December	***	***	
2020.-- January	***	***	
February	***	***	
March	***	***	
April	***	***	
Petition file date: April 16, 2020			
May	***	***	▲98.6
June	***	***	▲43.7
July	***	***	▲8.8
August	***	***	▼(13.3)
September	***	***	▼(38.1)
October	***	***	▼(38.1)

Note: The percent increase or (decrease) over the comparable pre-petition period.

Note: U.S. imports include imports from Netherlands from all suppliers during critical circumstance period.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed December 17, 2020.

Figure IV-5
PC strand: U.S. imports subject to Commerce's final AD critical circumstances determinations for certain U.S. imports from Netherlands, November 2019 to September 2020

* * * * *

Table IV-7

PC strand: U.S. imports subject to Commerce’s final AD critical circumstances determinations for certain U.S. imports from Turkey, November 2019 to October 2020

Month	Actual monthly quantity (1,000 pounds)	Outwardly cumulative subtotals (1,000 pounds)	Percentage change from comparable period (percent)
2019.--			
November	***	***	
December	***	***	
2020.--			
January	***	***	
February	***	***	
March	***	***	
April	***	***	
Petition file date: April 16, 2020			
May	***	***	▲ 7.2
June	***	***	▲ 55.0
July	***	***	▲ 60.2
August	***	***	▲ 32.1
September	***	***	▲ 16.8
October	***	***	▼ (10.6)

Note: The percent increase or (decrease) over the comparable pre-petition period.

Note: U.S. imports include imports from Turkey from all suppliers during critical circumstance period. Commerce made final AD determinations for certain U.S. imports from Turkey and critical circumstances exist for Guney Celik and all others, while critical circumstances do not exist for Celik Halat effective on December 11, 2020.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed December 17, 2020.

Figure IV-6
PC strand: U.S. imports subject to Commerce’s final AD critical circumstances determinations for certain U.S. imports from Turkey, November 2019 to October 2020

* * * * *

Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.⁷ 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.⁸

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-8 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.

⁷ 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)).

⁸ Section 771 (24) of the Act (19 U.S.C § 1677(24)).

Table IV-8

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	***	***	1.1
Colombia	***	***	---
Egypt	***	***	0.5
Indonesia	***	***	---
Italy	***	***	---
Malaysia	***	***	---
Netherlands	***	***	1.0
Saudi Arabia	***	***	2.3
South Africa	***	***	---
Spain	***	***	---
Taiwan	***	***	2.1
Tunisia	***	***	---
Turkey	***	***	---
Ukraine	***	***	1.0
UAE	***	***	1.0
Subject sources	***	***	9.0
Nonsubject sources	***	***	---
All import sources	***	***	9.0

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 and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012, accessed November 5, 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-9 and figure IV-7.

The shares of reported U.S. producers' U.S. shipments of pre-tension and post-tension product accounted for *** percent and *** 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-9

PC strand: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019

Item	End users		
	Pre-tension	Post-tension	All end users
Quantity (1,000 pounds)			
U.S. producers' U.S. shipments	***	***	***
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	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
U.S. producers and U.S. importers	***	***	***

Table continued on next page.

Table IV-9--Continued

PC strand: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019

Item	End users		
	Pre-tension	Post-tension	All end users
	Share across (percent)		
U.S. producers' U.S. shipments	***	***	***
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	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
U.S. producers and U.S. importers	***	***	***

Table continued on next page.

Table IV-9--Continued

PC strand: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019

Item	End users		
	Pre-tension	Post-tension	All end users
	Share down (percent)		
U.S. producers' U.S. shipments	***	***	***
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	***	***	***
Nonsubject sources	***	***	***
All import sources	***	***	***
U.S. producers and U.S. importers	***	***	***

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-7
PC strand: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019

* * * * *

Geographical markets

PC strand produced in the United States is shipped nationwide.⁹ 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-10 presents U.S. import quantities of PC strand sources and border of entry during 2019.¹⁰

⁹ See Part II for additional information on geographic markets.

¹⁰ 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-10
PC strand: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Quantity (1,000 pounds)				
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	155	7	30,094	2,841	33,098
All import sources	28,270	5,586	202,367	77,147	313,370

Table continued on next page.

Table IV-10--Continued
PC strand: U.S. imports by border of entry, 2019

Item	Border of entry				
	East	North	South	West	All borders
	Share across (percent)				
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-10--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 November 5, 2020.

Presence in the market

Table IV-11 and figure IV-8 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 September 2020. Imports from Colombia, Italy and Spain were present for 44 months of the 45 month period. With respect to subject imports, imports from UAE (11 of 45 months), Argentina (12 of 45 months) and Egypt (7 of 45 months), entered the United States in fewer than half the months during January 2017 to September 2020.

Table IV-11

PC strand: U.S. imports by month, January 2017 through September 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-11--Continued
PC strand: U.S. imports by month, January 2017 through September 2020

U.S. imports	Argentina	Colombia	Egypt	Indonesia	Italy	Malaysia
Quantity (1,000 pounds)						
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
April	230	299	---	---	4,118	4,812
May	---	475	621	1,299	5,154	4,016
June	---	2,198	1,563	2,806	5,380	3,580
July	---	338	---	---	761	1,778
August	---	1,368	---	---	2,363	778
September	---	854	---	---	1,392	1,246

Table continued on next page.

Table IV-11--Continued
PC strand: U.S. imports by month, January 2017 through September 2020

U.S. imports	Netherlands	Saudi Arabia	South Africa	Spain	Taiwan	Tunisia
	Quantity (1,000 pounds)					
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-11--Continued
PC strand: U.S. imports by month, January 2017 through September 2020

U.S. imports	Netherlands	Saudi Arabia	South Africa	Spain	Taiwan	Tunisia
	Quantity (1,000 pounds)					
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
April	163	1,065	3,223	3,949	224	1,612
May	323	3,976	---	7,378	904	---
June	149	---	521	6,969	933	---
July	239	---	4,115	3,976	1,362	---
August	---	---	---	926	924	---
September	---	---	2,926	758	---	---

Table continued on next page.

Table IV-11--Continued
PC strand: U.S. imports by month, January 2017 through September 2020

U.S. imports	Turkey	Ukraine	UAE	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

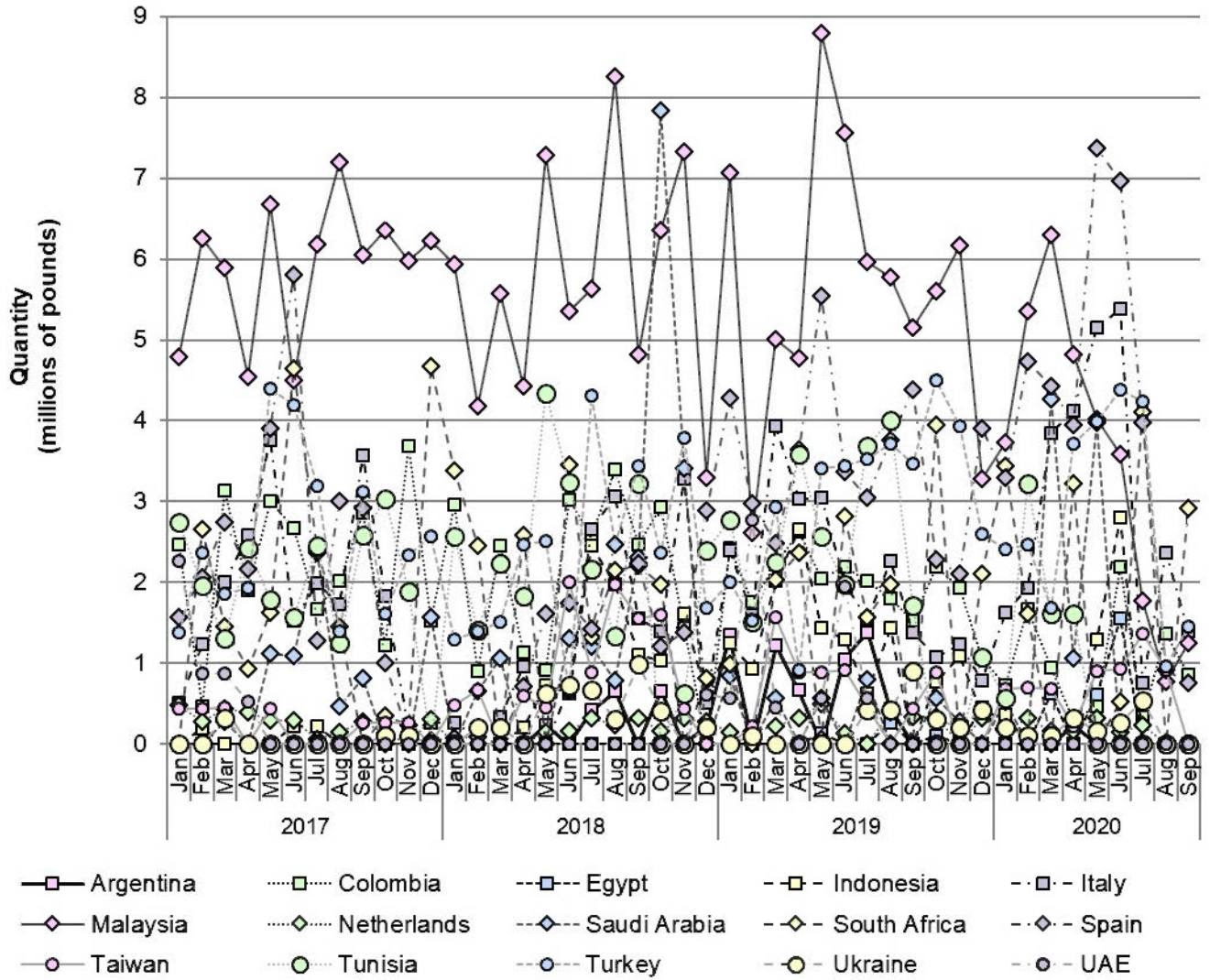
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Table IV-11--Continued
PC strand: U.S. imports by month, January 2017 through September 2020

U.S. imports	Turkey	Ukraine	UAE	Subject sources	Nonsubject sources	All import sources
Quantity (1,000 pounds)						
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	5,641	32,581
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
April	3,724	321	---	23,742	5,866	29,608
May	3,994	160	---	28,300	5,875	34,176
June	4,386	268	---	28,753	6,043	34,797
July	4,243	536	---	17,348	13,675	31,024
August	969	---	---	7,327	19,575	26,902
September	1,454	---	---	8,630	15,695	24,324

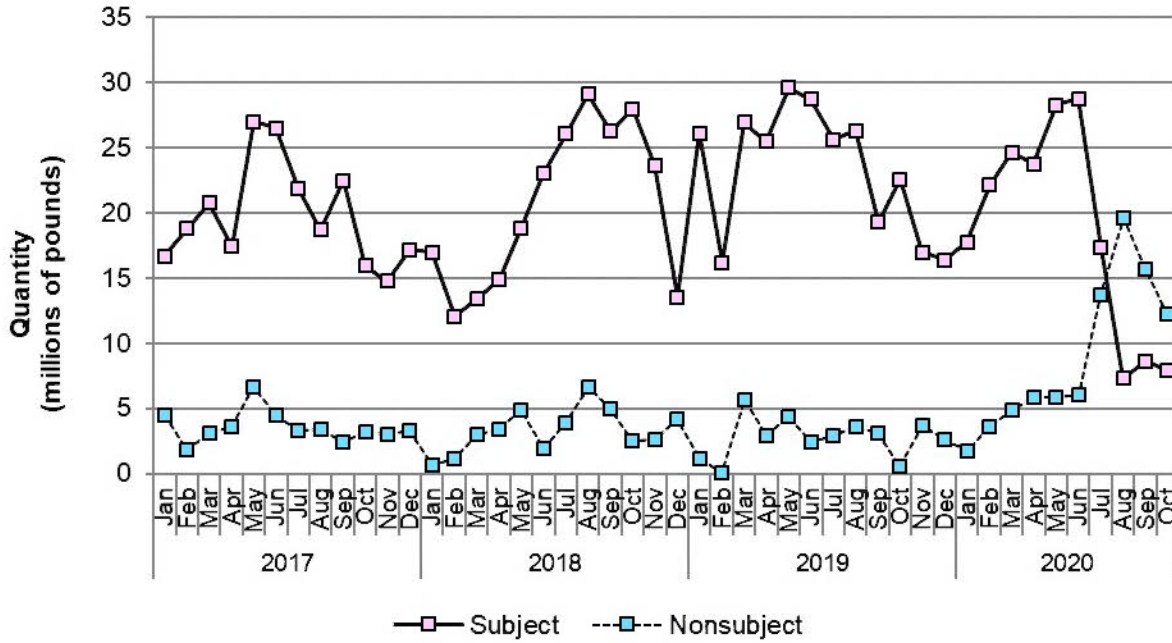
Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed November 5, 2020.

Figure IV-8
 PC strand: U.S. imports from individual subject sources, by month, January 2017 through September 2020



Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed November 5, 2020.

Figure IV-9
PC strand: U.S. imports from aggregated subject and nonsubject sources, by month, January 2017 through September 2020



Source: Official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012 accessed November 5, 2020.

Apparent U.S. consumption

Table IV-12 presents data on apparent U.S. consumption of PC strand for 2017 to 2019, January-September 2019, and January-September 2020, based on the questionnaire responses from U.S. producers and official import statistics. Apparent U.S. consumption increased by *** percent by quantity, and *** percent, by value, from 2017 to 2019, and was higher by *** percent, based on quantity, during January-September 2020 than during January-September 2019. Apparent consumption, based on value, was lower by *** percent in January-September 2020 than during January-September 2019.

Table IV-12

PC strand: Apparent U.S. consumption, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
Argentina	---	2,196	6,125	6,125	230
Colombia	26,649	24,241	23,840	18,644	8,875
Egypt	---	---	968	409	2,807
Indonesia	634	10,350	13,890	11,655	4,474
Italy	21,227	14,819	24,305	21,209	26,576
Malaysia	70,651	68,456	67,779	52,724	31,598
Netherlands	3,133	1,978	2,888	2,227	1,532
Saudi Arabia	7,732	18,591	3,647	2,792	9,836
South Africa	20,422	20,367	17,905	11,841	15,848
Spain	26,609	15,852	41,812	33,517	36,406
Taiwan	2,589	10,676	6,288	5,400	6,416
Tunisia	22,991	25,373	25,173	24,091	7,007
Turkey	30,378	27,889	35,971	24,943	25,335
Ukraine	529	4,385	2,796	1,848	1,707
UAE	4,542	612	6,884	6,884	---
Subject sources	238,086	245,786	280,272	224,310	178,648
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Table continued on next page.

Table IV-12--Continued
PC strand: Apparent U.S. consumption, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
Argentina	---	1,083	2,599	2,599	89
Colombia	9,156	10,594	9,846	7,868	3,127
Egypt	---	---	372	173	889
Indonesia	213	4,416	5,380	4,578	1,344
Italy	7,379	7,382	10,984	9,707	9,974
Malaysia	23,838	30,263	27,129	21,630	10,576
Netherlands	1,907	1,300	1,800	1,413	872
Saudi Arabia	2,575	7,698	1,422	1,117	3,084
South Africa	7,023	9,063	7,490	5,170	5,681
Spain	9,437	7,703	16,501	13,507	12,539
Taiwan	1,014	5,092	3,056	2,683	2,427
Tunisia	7,683	10,967	9,900	9,546	2,252
Turkey	10,580	12,603	14,311	10,040	9,429
Ukraine	187	1,836	987	672	524
UAE	1,891	250	2,359	2,359	---
Subject sources	82,884	110,251	114,134	93,061	62,807
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012, accessed November 5, 2020.

U.S. market shares

U.S. market share data are presented in table IV-13 and figure IV-10 during 2017-19, January-September 2019, and January-September 2020. U.S. producers' share of apparent U.S. consumption by quantity, increased from *** percent in 2017 to *** percentage points in 2018 before decreasing to *** percentage points in 2019, and it was higher during January to September 2020 than during January to September 2019. U.S. producers' share of apparent U.S. consumption by value, decreased from *** percentage points in 2017 to *** percentage points in 2018, and kept decreasing to *** percentage points in 2019, while it was higher during January to September 2020 by *** percentage points compared to January to September 2019. Subject imports' share of the U.S. market by quantity decreased *** from *** percentage points in 2017 to *** percentage points in 2018 and increased to *** percentage points in 2019, but it was lower during January to September 2020 than during January to

September 2019. Subject imports' share of the U.S. market by value, increased from *** percentage points in 2017 to *** percentage points in 2018 and *** percentage points in 2019, but it was lower by *** percentage points during January to September 2020 than during January to September 2019. Meanwhile, the share of nonsubject imports declined from *** percent in 2017 to *** percent in 2018 and *** percent in 2019, by quantity, and from *** percent in 2017 to *** percent in 2019, by value, but were higher during January to September 2020 by *** percentage points than during January to September 2019.

Table IV-13
PC strand: Market shares, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Apparent U.S. consumption	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
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	***	***	***	***	***

Table continued on next page.

Table IV-13--Continued

PC strand: Market shares, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Value (1,000 dollars)				
Apparent U.S. consumption	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
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	***	***	***	***	***

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

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012, accessed November 5, 2020.

Figure IV-10
PC strand: Apparent U.S. consumption, 2017-19, January-September 2019, and January-September 2020

* * * * *

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.¹ Covered PC strand can be epoxy-coated or lubricated with grease and sheathed in a plastic coating.² The main raw material used to manufacture PC strand is hot-rolled, high-carbon steel wire rod.³ Raw materials, as a percentage of the costs of goods sold (“COGS”), fluctuated during 2017-19, increasing from *** percent in 2017 to *** percent in 2018 before decreasing to *** percent of COGS in 2019; they were also lower in the first three quarters of 2020 (*** percent) than the first three quarters of 2019 (*** percent).

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.⁴ Most importers (*** responding firms) reported that raw material prices had fluctuated, *** indicated that raw material prices had increased, *** indicated that raw material prices had decreased, and *** reported no change in raw material prices.⁵ Seven of 18 purchasers were familiar with PC strand raw material prices and 8 of 14 reported that raw material prices had affected contract prices for PC strand.

Prices of high carbon steel wire rod have fluctuated since January 2017 (figure V-1). Wire rod prices were generally increasing but increased sharply after the April 2018 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 October 2020, wire rod prices have increased by *** percent.

¹ Petition, p. 13.

² Petition, p. 13.

³ Wire accounted for *** percent of U.S. producers’ raw material costs.

⁴ 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.”

⁵ 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 October 2020

* * * * *

Source: American Metal Market, www.amm.com, retrieved November 10, 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.^{6 7} Most U.S. producers (3 of 5) and importers (***) reported that the section 232 tariffs had increased raw material prices. Two U.S. producers and *** importers reported that the section 232 tariffs had caused raw material prices to fluctuate, and *** importer reported that the section 232 tariffs had not caused any changes in the price of raw materials.

⁶ The section 232 tariffs imposed a 25 percent ad valorem duty on imports of steel mill products. *Adjusting Imports of Steel into the United States*, 83 FR 11625, March 15, 2018.

⁷ 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.

Firms were divided on the impact of the section 232 tariffs on PC strand prices. Three U.S. producers (***) reported that the section 232 tariffs had caused PC strand prices to fluctuate; *** reported that they had caused prices to decrease.⁸ *** responding importers reported that the section 232 tariffs had not had an impact on PC strand prices, *** reported PC strand prices increased, and *** reported PC strand prices fluctuated 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 5.3 percent for all subject countries combined and ranged from 2.7 percent (Taiwan) to 13.2 percent (Argentina) during 2019.⁹ These estimates were derived from official import data and represent the transportation and other charges on imports.¹⁰

U.S. inland transportation costs

All responding U.S. producers and importers reported that they typically arrange transportation to their customers. Responding U.S. producers reported that their U.S. inland transportation costs ranged from 4.4 to 8.3 percent while most importers reported costs of 2.0 to 10.0 percent.

⁸ In the preliminary phase, 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.

⁹ Import data indicate that transportation costs were 0 for Indonesia, Tunisia, and Ukraine.

¹⁰ 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.

Pricing practices

Pricing methods

U.S. producers and importers reported using transaction-by-transaction negotiations, contracts,¹¹ 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. Seventeen of 18 purchasers noted that their purchasing involves negotiations. Ten purchasers noted that negotiations include pricing, six noted delivery timing, four noted availability, two noted quantities, and two noted payment terms. Three stated that they never share actual competing offers.

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	***
Contract	2	***
Set price list	1	***
Other	---	***
Responding firms	5	8

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 via short-term contract, however responding 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.

¹¹ Importer *** reported it uses contracts with competitive bids.

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,¹² typically have a fixed price and quantity provision, and prices are not indexed to raw materials. Importers' reported short-term contract durations averaged *** days. *** responding importers also reported that prices are not renegotiated, *** reported prices and quantities are fixed, and *** responding importers noted that prices are not indexed to raw materials. The two importers reporting that they use annual contracts were split among typical contract provisions with respect to price renegotiation, price/quantity fixing, and raw material indexing.

One purchaser reported that it purchases PC strand daily, 5 purchase weekly, 2 purchase monthly, 10 purchase quarterly, and 1 purchases annually. Fifteen of 18 purchasers reported that their purchasing frequency had not changed since 2017. On average, purchasers contact two to four suppliers before making a purchase, though one purchaser only contacts one supplier.

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 discounts, and the remaining three responding U.S. producers did not provide any discounts.¹³ No importers reported any discount policies.

Price leadership

Five purchasers reported that U.S. producer Insteel was a price leader, two reported U.S. producer Sumiden and one each noted that U.S. producer Bekaert and importer A.G. Royce (Concrete Reinforcing Products) were price leaders. While Sumiden was noted to drive prices higher, A.G. Royce was noted to consistently have low prices. Insteel was reported to have well-communicated price changes, that are flattened to control one purchaser's costs. It was also noted to generally be the first to initiate price increases; have price flexibility and product availability; and have "great price, delivery, service, and quality."

¹² Two U.S. producers reported that prices can be renegotiated in short-term contracts, while three reported they are not renegotiated in short-term contracts; all responding producers reported prices are not renegotiated in annual or long-term contracts.

¹³ U.S. producer *** indicated that its discount policy varies due to "competitive conditions driven by unfair imports."

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 September 2020.

Product 1.-- Sales for pre-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete stand. Sales to the pre-tension market.

Product 2.-- Sales for post-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete stand. Sales to the post-tension market.

All five U.S. producers and seven importers provided usable pricing data although not all firms reported pricing data for all products for all quarters.^{14 15} Pricing data reported by these firms accounted for approximately *** percent of U.S. producers' U.S. shipments of PC strand,¹⁶ *** 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:

- Argentina – *** percent
- Colombia – *** percent
- Egypt – *** percent
- Indonesia – *** percent

¹⁴ 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.

¹⁵ Importer *** provided estimates of its pricing data based "prorated estimates/averages" from the "best available reports from {its} somewhat antiquated ERP system," noting that it did not track its quarterly sales of PC strand by country of origin. Email from ***, November 10, 2020. This importer reported pricing data for product from *** to report pricing data for product from ***.

¹⁶ Two U.S. producers, ***, submitted ***. *** is sold to the pre-tension market and the remainder to the post-tension market, and that the typical price difference between the two is 5 to 10 percent. Quantity and value data for *** were adjusted to reflect this by ***. Staff is awaiting updated data from ***.

- Italy – *** percent
- Malaysia – *** percent
- Saudi Arabia -- *** percent
- South Africa – *** percent
- Taiwan – *** percent
- Tunisia – *** percent
- Turkey – *** percent
- Ukraine – *** percent
- UAE – *** percent

Price data for products 1 and 2 are presented in tables V-3 and V-4, as well as in figures V-2 and V-3. Nonsubject country prices were not collected. No pricing data were reported for imports from the Netherlands, or Spain.

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-September 2020

Period	United States		Tunisia			Turkey		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
2017:								
Jan.-Mar.	432	53,604	***	***	***	***	***	***
Apr.-June	443	53,650	***	***	***	***	***	***
July-Sept.	449	53,333	***	***	***	***	***	***
Oct.-Dec.	455	44,602	***	***	***	***	***	***
2018:								
Jan.-Mar.	470	41,640	***	***	***	***	***	***
Apr.-June	508	41,097	***	***	***	***	***	***
July-Sept.	542	40,317	***	***	***	***	***	***
Oct.-Dec.	548	39,407	***	***	***	***	***	***
2019:								
Jan.-Mar.	540	36,436	***	***	***	***	***	***
Apr.-June	521	46,079	***	***	***	***	***	***
July-Sept.	501	39,646	***	***	***	***	***	***
Oct.-Dec.	476	40,194	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	484	38,642	***	***	***	401	***	***
July-Sept.	***	***	***	***	***	***	***	***

Note: Product 1: Sales for pre-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand. Sales to the pre-tension market.

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

Table V-4—Continued

PC strand: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Malaysia			Saudi Arabia		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
2017:								
Jan.-Mar.	344	51,729	***	***	***	***	***	***
Apr.-June	389	50,601	***	***	***	***	***	***
July-Sept.	417	46,563	***	***	***	***	***	***
Oct.-Dec.	409	52,422	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	495	75,217	***	***	***	***	***	***
July-Sept.	537	64,456	***	***	***	***	***	***
Oct.-Dec.	528	32,727	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	450	46,666	***	***	***	***	***	***
July-Sept.	445	40,673	***	***	***	***	***	***
Oct.-Dec.	409	43,212	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	***	***	***	***	***	***	***	***
July-Sept.	472	50,815	***	***	***	***	***	***
	United States		South Africa			Tunisia		
2017:								
Jan.-Mar.	344	51,729	***	***	***	***	***	***
Apr.-June	389	50,601	***	***	***	***	***	***
July-Sept.	417	46,563	***	***	***	***	***	***
Oct.-Dec.	409	52,422	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	495	75,217	***	***	***	***	***	***
July-Sept.	537	64,456	***	***	***	***	***	***
Oct.-Dec.	528	32,727	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	450	46,666	***	***	***	***	***	***
July-Sept.	445	40,673	***	***	***	***	***	***
Oct.-Dec.	409	43,212	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	***	***	***	***	***	***	***	***
July-Sept.	472	50,815	***	***	***	***	***	***

Table continued on next page.

Table V-4

PC strand: Weighted-average f.o.b. prices and quantities of domestic and imported product 2 and margins of underselling/(overselling), by quarter, January 2017-September 2020

Period	United States		Turkey			Ukraine		
	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)	Price (dollars per 1,000 pounds)	Quantity (1,000 pounds)	Margin (percent)
2017:								
Jan.-Mar.	344	51,729	***	***	***	***	***	***
Apr.-June	389	50,601	***	***	***	***	***	***
July-Sept.	417	46,563	***	***	***	***	***	***
Oct.-Dec.	409	52,422	***	***	***	***	***	***
2018:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	495	75,217	***	***	***	***	***	***
July-Sept.	537	64,456	***	***	***	***	***	***
Oct.-Dec.	528	32,727	***	***	***	***	***	***
2019:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	450	46,666	***	***	***	***	***	***
July-Sept.	445	40,673	***	***	***	***	***	***
Oct.-Dec.	409	43,212	***	***	***	***	***	***
2020:								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-June	***	***	***	***	***	***	***	***
July-Sept.	472	50,815	***	***	***	***	***	***

Note: Product 2: Sales for post-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand. Sales to the post-tension market.

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-September 2020

* * * * *

Product 1: Sales for pre-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand. Sales to the pre-tension market.

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

Figure V-3
PC strand: Weighted-average prices and quantities of domestic and imported product 2, by quarter, January 2017-September 2020

* * * * *

Product 2: Sales for post-tension use. 1/2-inch, grade 270 (270,000 PSI), low-relaxation, uncovered prestressed concrete strand. Sales to the post-tension market.

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

Price trends

In general, prices increased between the first quarter of 2017 and the third quarter of 2020. Table V-5 summarizes the price trends, by country and by product. As shown in the table, domestic prices increased by *** percent for product 1 and 37.3 percent for product 2 during January 2017-September 2020. Import prices increased in 15 of 17 possible comparisons. Price increases ranged from *** to *** percent. Prices of product 1 from *** decreased by *** percent and product 2 from *** decreased by *** percent.

Table V-5
PC strand: Summary of weighted-average f.o.b. prices for products 1 and 2 from the United States and subject countries

Item	Number of quarters	Low price (per 1,000 pounds)	High price (per 1,000 pounds)	Change in price (percent)
Product 1				
United States	15	432	548	▲ ***
Argentina	8	***	***	---
Colombia	15	***	***	▲ ***
Egypt	7	***	***	---
Indonesia	8	***	***	▲ ***
Italy	15	***	***	▲ ***
Malaysia	15	***	***	▲ ***
South Africa	15	***	***	▲ ***
Taiwan	15	***	***	▲ ***
Tunisia	14	***	***	▼ ***
Turkey	15	***	***	▲ ***
Product 2				
United States	15	344	537	▲ 37.3
Colombia	15	***	***	▲ ***
Egypt	7	***	***	---
Indonesia	14	***	***	▲ ***
Italy	15	***	***	▲ ***
Malaysia	15	***	***	▲ ***
Saudi Arabia	10	***	***	▼ ***
South Africa	15	***	***	▲ ***
Tunisia	14	***	***	▲ ***
Turkey	15	***	***	▲ ***
Ukraine	11	***	***	▲ ***
UAE	3	***	***	---

Note: Percentage change from the first quarter in which data were available in 2017 to the last quarter in which price data were available in 2020. A period change preceded by a “▲” represents an increase while a “▼” represents a decrease.

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

Price comparisons

As shown in table V-6, prices for product imported from subject countries were below those for U.S.-produced product in 167 of 261 instances (437 million pounds); margins of underselling ranged from 0.4 to 35.6 percent, but averaged 10.4 percent. In the remainder of instances, 94 of 2561 (309 million pounds), prices for product from subject countries were higher than domestic prices - between 0.2 and 28.7 percent, averaging 5.1 percent.¹⁷ Most instances of underselling – 104 of 167 - were for the pre-tension product (product 1), whereas the majority of overselling instances – 71 of 94 – occurred with respect to sales of the post-tension product (product 2). All countries for which there were pricing comparisons had quarters of both underselling and overselling with the exception of Argentina which undersold U.S. product in all 8 comparisons. The greatest average margin of underselling occurred when comparing prices of the U.S. product with that from Egypt (**% percent), and the greatest average margin of overselling occurred with respect to Ukraine (**% percent).¹⁸

¹⁷ Petitioners argue that the number of quarters of underselling and the margins of underselling are understated due to **. Petitioners' prehearing brief, pp. 46-48.

¹⁸ Petitioners note, however, that no data were received from importers of subject product from Spain, which reportedly has among the lowest prices in the market. Petitioners' prehearing brief, p. 46.

Table V-6
PC strand: Instances of underselling/overselling and the range and average of margins, by country, January 2017-September 2020

Source	Underselling				
	Number of quarters	Quantity (1,000 pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	104	***	***	***	***
Product 2	63	***	***	***	***
Total	167	437,377	10.4	0.4	35.6
Argentina	8	***	***	***	***
Colombia	18	***	***	***	***
Egypt	10	***	***	***	***
Indonesia	11	***	***	***	***
Italy	17	***	***	***	***
Malaysia	18	***	***	***	***
Saudi Arabia	8	***	***	***	***
South Africa	18	***	***	***	***
Taiwan	10	***	***	***	***
Tunisia	22	***	***	***	***
Turkey	19	***	***	***	***
Ukraine	6	***	***	***	***
United Arab Emirates	2	***	***	***	***
Total	167	437,377	10.4	0.4	35.6
Source	(Overselling)				
	Number of quarters	Quantity (1,000 pounds)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	23	***	***	***	***
Product 2	70	***	***	***	***
Total	93	309,181	(5.1)	(0.2)	(28.7)
Colombia	12	***	***	***	***
Egypt	4	***	***	***	***
Indonesia	11	***	***	***	***
Italy	13	***	***	***	***
Malaysia	12	***	***	***	***
Saudi Arabia	2	***	***	***	***
South Africa	12	***	***	***	***
Taiwan	5	***	***	***	***
Tunisia	6	***	***	***	***
Turkey	11	***	***	***	***
Ukraine	5	***	***	***	***
United Arab Emirates	1	***	***	***	***
Total	93	309,181	(5.1)	(0.2)	(28.7)

Note: These data include only quarters in which there is a comparison between the U.S. and subject product.

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

Lost sales and lost revenue

In the preliminary phase of the investigation, the Commission requested that U.S. producers of PC strand report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of PC strand from subject countries during 2017-19. 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).¹⁹ 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).²⁰ 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.

In the final phase of the investigation, 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.

Staff contacted 66 purchasers and received responses from 18 purchasers. Responding purchasers reported purchasing *** billion pounds of PC strand during 2017-19 (tables V-7 and V-8).

Of the 17 responding purchasers, 11 reported that, since 2017, they had purchased imported PC strand from subject countries instead of U.S.-produced product. The countries with the greatest number of purchasers reporting having done so were Malaysia (10 purchasers), Italy, Tunisia, and Turkey (7 each), Indonesia and Spain (5 each), and Colombia, South Africa, and the UAE (4 each). Nine of these purchasers reported that subject import prices were lower than U.S.-produced product for at least one of the countries, and eight of these purchasers reported that price was a primary reason for the decision to purchase imported product rather than U.S.-produced product.

¹⁹ Different U.S. producers alleged either a lost sale, revenue, or both against the same purchaser.

²⁰ Two allegations were made against "multiple subject countries."

Table V-8
PC strand: Purchasers' share of reported purchases and imports by country, 2017-19

Source	2017	2018	2019
	Share of quantity (percent)		
United States	63.5	61.1	57.4
Argentina	***	***	***
Colombia	0.2	1.4	1.7
Egypt	0.0	0.0	0.0
Indonesia	0.1	0.0	0.3
Italy	0.5	0.4	1.7
Malaysia	4.6	7.1	5.9
Netherlands	***	***	***
Saudi Arabia	***	***	***
South Africa	0.7	1.1	0.4
Spain	5.7	2.9	6.3
Taiwan	***	***	***
Tunisia	2.9	3.1	2.2
Turkey	1.6	1.4	3.2
Ukraine	***	***	***
UAE	0.7	0.2	0.1
Subject sources	17.1	18.3	22.3
Nonsubject sources	2.1	5.1	3.6
Unknown sources	19.1	23.3	25.9
All import sources	17.4	15.6	16.7
Total	100.0	100.0	100.0

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

Of the 16 responding purchasers, 2 reported that U.S. producers had reduced prices in order to compete with lower-priced imports from any subject country. Purchaser *** estimated that U.S. producers had to reduce their prices by 3 percent to compete with subject product imported from all subject countries except Egypt, Indonesia, Saudi Arabia, Ukraine, and the UAE. Purchaser *** reported that Malaysia was the country that was responsible for U.S. producers lowering prices, but did not estimate a percentage reduction. Neither *** reported that U.S. producers did not reduce their prices due to competition from any subject country. However, seven purchasers reported that domestic firms did not lower their prices to compete with subject imports, totaling 50 observations, with at least two responding purchasers stating that it hadn't for each subject country.²¹

²¹ Half of all purchasers reported that they did not know whether domestic firms had lowered their prices in response to competition from any of the subject countries.

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	2	---	---	***
Colombia	4	5	5	6,778
Egypt	1	---	---	---
Indonesia	5	5	5	699
Italy	7	5	4	5,648
Malaysia	10	8	6	55,771
Netherlands	1	---	---	***
Saudi Arabia	3	2	1	***
South Africa	4	2	2	2,088
Spain	5	3	3	26,788
Taiwan	2	1	1	***
Tunisia	7	6	6	18,834
Turkey	7	4	5	12,013
Ukraine	2	1	1	***
UAE	4	2	2	1,471
All subject sources	11	9	8	131,744

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

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.¹ 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.^{2 3}

Figure VI-1 presents each responding U.S. 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 during the period for which data were collected).

¹ Three U.S. producers reported fiscal years ending on December 31st while ***.

² Sumiden added a third PC strand facility in Dayton, Texas (***). Production of PC strand at Dayton, Texas ***. Sumiden's U.S. producer questionnaire, II-2a and III-15; and Sumiden webpage, <http://www.sumidenwire.com/about/>, retrieved May 13, 2020 and November 10, 2020.

³ 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 (Liberty Strand Tech, Summerville, South Carolina) to Insteel Wire Products (wholly owned subsidiary of Insteel Industries, Inc.) for \$22.5 million. Insteel closed the Liberty Strand Tech facility and is in the process of moving the PC strand production equipment to its other facilities located in Florida, Tennessee, and Texas. ***'s U.S. producer questionnaires, II-2.

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

* * * * *

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

Operations on PC strand

Table VI-1 presents aggregated data on U.S. producers' operations in relation to PC strand from 2017 to 2019, January-September 2019 ("interim 2019"), and January to September 2020 ("interim 2020"), while table VI-2 presents corresponding changes in average unit values ("AUV") data between periods. Table VI-3 presents selected company-specific financial data.⁴

⁴ One U.S. producer (***) did not provide interim 2019 or interim 2020 data citing that it ***. *** U.S. producer questionnaire, II-2a, II-14, and III-18.

Table VI-1
PC strand: Results of operations of U.S. producers, 2017-19, January to September 2019, and
January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Total net sales	673,152	705,013	645,796	452,331	506,442
	Value (1,000 dollars)				
Total net sales	295,030	362,093	321,734	227,946	237,776
Cost of goods sold.--					
Raw materials	195,392	258,311	236,588	173,476	160,867
Direct labor	17,583	19,163	17,544	11,944	13,851
Other factory costs	46,846	47,804	58,315	36,621	40,241
Total COGS	259,821	325,278	312,447	222,041	214,959
Gross profit	35,209	36,815	9,287	5,905	22,817
SG&A expense	19,021	21,125	17,521	11,683	16,168
Operating income or (loss)	16,188	15,690	(8,234)	(5,778)	6,649
Other expenses or (income), net	1,284	1,316	1,032	883	1,976
Net income or (loss)	14,904	14,374	(9,266)	(6,661)	4,673
Depreciation/amortization	8,895	10,036	11,442	7,476	8,306
Cash flow	23,799	24,410	2,176	815	12,979
	Ratio to net sales (percent)				
Cost of goods sold.--					
Raw materials	66.2	71.3	73.5	76.1	67.7
Direct labor	6.0	5.3	5.5	5.2	5.8
Other factory costs	15.9	13.2	18.1	16.1	16.9
Average COGS	88.1	89.8	97.1	97.4	90.4
Gross profit	11.9	10.2	2.9	2.6	9.6
SG&A expense	6.4	5.8	5.4	5.1	6.8
Operating income or (loss)	5.5	4.3	(2.6)	(2.5)	2.8
Net income or (loss)	5.1	4.0	(2.9)	(2.9)	2.0

Table continued on next page.

Table VI-1—Continued

PC strand: Results of operations of U.S. producers, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio to total COGS (percent)				
Cost of goods sold.--					
Raw materials	75.2	79.4	75.7	78.1	74.8
Direct labor	6.8	5.9	5.6	5.4	6.4
Other factory costs	18.0	14.7	18.7	16.5	18.7
Average COGS	100.0	100.0	100.0	100.0	100.0
	Unit value (dollars per 1,000 pounds)				
Total net sales	438	514	498	504	470
Cost of goods sold.--					
Raw materials	290	366	366	384	318
Direct labor	26	27	27	26	27
Other factory costs	70	68	90	81	79
Average COGS	386	461	484	491	424
Gross profit	52	52	14	13	45
SG&A expense	28	30	27	26	32
Operating income or (loss)	24	22	(13)	(13)	13
Net income or (loss)	22	20	(14)	(15)	9
	Number of firms reporting				
Operating losses	---	---	5	4	1
Net losses	---	---	4	4	1
Data	5	5	5	4	4

Note: U.S. producer *** was unable to provide data for interim 2019 and interim 2020. See footnote 4 in this part of the report for more information.

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

Table VI-2

PC strand: Changes in AUVs between calendar years and partial year periods

Item	Between calendar years			Between partial year periods
	2017-19	2017-18	2018-19	2019-20
	Change in AUVs (percent)			
Total net sales	▲ 13.7	▲ 17.2	▼ (3.0)	▼ (6.8)
Cost of goods sold.--				
Raw materials	▲ 26.2	▲ 26.2	▼ (0.0)	▼ (17.2)
Direct labor	▲ 4.0	▲ 4.1	▼ (0.1)	▲ 3.6
Other factory costs	▲ 29.8	▼ (2.6)	▲ 33.2	▼ (1.9)
Average COGS	▲ 25.3	▲ 19.5	▲ 4.9	▼ (13.5)
	Change in AUVs (dollars per 1,000 pounds)			
Total net sales	▲ 60	▲ 75	▼ (15)	▼ (34)
Cost of goods sold.--				
Raw materials	▲ 76	▲ 76	▼ (0)	▼ (66)
Direct labor	▲ 1	▲ 1	▼ (0)	▲ 1
Other factory costs	▲ 21	▼ (2)	▲ 22	▼ (2)
Average COGS	▲ 98	▲ 75	▲ 22	▼ (66)
Gross profit	▼ (38)	▼ (0)	▼ (38)	▲ 32
SG&A expense	▼ (1)	▲ 2	▼ (3)	▲ 6
Operating income or (loss)	▼ (37)	▼ (2)	▼ (35)	▲ 26
Net income or (loss)	▼ (36)	▼ (2)	▼ (35)	▲ 24

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

Table VI-3

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Total net sales (1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	673,152	705,013	645,796	452,331	506,442
	Total net sales (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	295,030	362,093	321,734	227,946	237,776
	Cost of goods sold (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	259,821	325,278	312,447	222,041	214,959
	Gross profit or (loss) (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	35,209	36,815	9,287	5,905	22,817

Table continued on next page.

Table VI-3—Continued

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	SG&A expenses (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	19,021	21,125	17,521	11,683	16,168
	Operating income or (loss) (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	16,188	15,690	(8,234)	(5,778)	6,649
	Net income or (loss) (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	14,904	14,374	(9,266)	(6,661)	4,673
	COGS to net sales ratio (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	88.1	89.8	97.1	97.4	90.4

Table continued on next page.

Table VI-3—Continued

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Gross profit or (loss) to net sales ratio (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	11.9	10.2	2.9	2.6	9.6
	SG&A expense to net sales ratio (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	6.4	5.8	5.4	5.1	6.8
	Operating income or (loss) to net sales ratio (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	5.5	4.3	(2.6)	(2.5)	2.8
	Net income or (loss) to net sales ratio (percent)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	5.1	4.0	(2.9)	(2.9)	2.0

Table continued on next page.

Table VI-3—Continued

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit net sales value (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	438	514	498	504	470
	Unit raw materials (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	290	366	366	384	318
	Unit direct labor (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	26	27	27	26	27
	Unit other factory costs (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	70	68	90	81	79

Table continued on next page.

Table VI-3—Continued

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit COGS (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	386	461	484	491	424
	Unit gross profit or (loss) (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	52	52	14	13	45
	Unit SG&A expenses (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	28	30	27	26	32
	Unit operating income or (loss) (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	24	22	(13)	(13)	13

Table continued on next page.

Table VI-3—Continued

PC strand: Select results of operations of U.S. producers, by company, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Unit net income or (loss) (dollars per 1,000 pounds)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	22	20	(14)	(15)	9

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

Note: U.S. producer *** was unable to provide data for interim 2019 and interim 2020. See footnote 4 in this part of the report for more information.

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

Net sales

As presented in table VI-1 and noted earlier, total net sales reflect only commercial sales, with both quantity and value increasing from 2017 to 2018 but decreasing from 2018 to 2019. Net sales quantities declined by 4.1 percent while net sales value increased by 9.1 percent from 2017 to 2019. Net sales quantity and value both were higher in interim 2020 than in interim 2019. 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 interim

2020.^{5 6 7} As presented in table VI-3, three U.S. producers (***) reported positive net sales quantity 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 2019.⁸ *** net sales quantity and value growth from 2018 to 2019.⁹ Three U.S. producers reported higher net sales quantity and value in interim 2020 compared with interim 2019.^{10 11}

⁵ Exports were reported by ***. See table III-7 for additional details.

⁶ With the exception of the smallest U.S. producer, ***, U.S. producers were unable to report financial data separately for pre- and post-tension PC strand. *** explaining that the ***. *** stated that it is ***. ***. *** reported limited separate financials for pre- and post-tension PC strand, selling *** pounds of pre-tension and *** pounds of post-tension PC strand, both types were sold at \$*** per pound. *** reported operating income of \$*** in its pre-tension operations and an operating loss of \$*** in post-tension operations. U.S. producer questionnaires, III-18. For information on U.S. producers' shipments of PC strand by type, see appendix D.

⁷ Petitioners stated that ***. Witness testified that portions of the same coil of PC strand could be used in both pre- and post-tension applications. Petitioners' posthearing brief, p. 26 and hearing transcript, pp. 83-85 and 117-18 (Wagner).

⁸ Sumiden testified that it maintained sales at the expense of revenue and profitability. Hearing transcript, p. 30 (Cornelius).

⁹ ***. Petitioner counsel stated that "prices tend to be higher to pre-tension users" because more of the pre-tension sales are Buy America sales." 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." Testimony of Barrenechea, May 5, 2020, p. 3 and hearing transcript, p. 83 (Cannon and Wagner).

¹⁰ The *** PC strand U.S. producer *** reported lower net sales quantity and value in interim 2020 than in interim 2019.

¹¹ ***. See footnote 4 in this part of the report for more information.

Net sales AUVs of U.S. producers fluctuated, from \$438 per-1,000 pounds in 2017, increasing to \$514 per-1,000 pounds in 2018, before declining to \$498 per-1,000 pounds in 2019; net sales AUVs were lower in interim 2020 than in interim 2019. As presented in table VI-2, AUVs increased by 13.7 percent from 2017 to 2019. On a company-specific basis, all responding U.S. producers reported increases in AUVs of PC strand from 2017 to 2019 (table VI-3). The largest U.S. producer (***) reported AUVs below the industry average in all five periods for which data were collected while the smallest U.S. producer *** reported the highest per unit sales values.¹²

Cost of goods sold and gross profit or loss

As presented in table VI-1, total cost of goods sold (“COGS”) irregularly increased from 2017 to 2019 and consistently increased per unit and as a ratio to net sales; total COGS were lower in interim 2020 than in interim 2019. Average unit value of COGS increased from \$386 in 2017 to \$461 in 2018 and then further increased to \$484 in 2019. As a ratio to net sales, total COGS increased from 88.1 percent in 2017 to 89.8 in 2018 and then to 97.1 percent in 2019, 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 74.8 percent to 79.4 percent during the period for which data were collected. Raw material costs fluctuated in absolute values, with the lowest costs reported in 2017 followed by an increase in 2018 before decreasing in 2019, mostly reflecting price increases of wire rod (the

¹² *** 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.

primary raw material) as a result of Section 232 tariffs in 2018.¹³ ¹⁴ Average raw material costs were \$290 per-1,000 pounds in 2017, and \$366 per-1,000 pounds in 2018 and 2019; average unit raw material costs were lower in interim 2020 than in interim 2019. As a ratio to net sales, raw materials increased from 66.2 percent to 73.5 percent from 2017 to 2019 but were lower in interim 2020 than in interim 2019. Table VI-4 presents raw materials, by type.¹⁵ Wire rod is virtually the only raw material used to produce PC strand.

Table VI-4
PC strand: Raw materials by type, 2019

Raw materials	Calendar year 2019			Acquisition method	
	Value (1,000 dollars)	Unit value (dollars per 1,000 pounds)	Share of value (percent)	Make	Purchase
Wire rod	236,292	366	99.9	---	5
Other material inputs	296	0	0.1	---	3
Total, raw materials	236,588	366	100.0		

Note: ***.

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

¹³ U.S. producer questionnaires, IV-18. Insteel’s 2019 Form 10-Q explained that “the decrease in average selling prices was driven by competitive pricing pressures resulting from an increase in low-priced import competition spurred by the Section 232 tariffs on imported steel.” Petitioners’ posthearing brief, p. 18 and att. 2.

Witness from the Embassy of Indonesia testified that the Section 232 tariffs imposed on imports of wire rod (the primary raw material used in the production of PC strand) in April 2018 resulted in raw material price fluctuations and that “only in 2020 when the cost of material dropped, the domestic producers managed to increase their {financial} performance.” On the other hand, U.S. producers testified that the importers “took advantage” of the Section 232 tariff on wire rods and shifted to downstream PC strand products. Hearing transcript, p. 12 (Wijayanto) and p. 24 (Woltz).

¹⁴ No U.S. producer reported any effect on financial performance as a result of the COVID-19 pandemic. ***. ***. U.S. producer questionnaires, III-9f.

¹⁵ Two producers *** reported purchasing wire rod at fair market value from related entities in 2019. *** and ***.

As presented in table VI-3, the directional trend of company-specific average raw material costs tracked closely for the two largest producers (***) and varied among the three smallest producers (***)¹⁶ *** average raw materials costs largely reflect the same pattern as their average net sales values.¹⁷ ***¹⁸

Other factory costs represent the second largest share of total COGS, ranging from 14.7 percent to 18.7 percent during the period for which data were collected. Other factory costs consistently increased each year from 2017 to 2019 and were higher in interim 2020 than in interim 2019, primarily caused by periodic idling and reductions in shift detailed in table III-3. As a ratio to sales, other factory costs increased from 2017 to 2019 and were higher in interim 2020 than in interim 2019, with the lowest other factory costs ratio reported in 2018 when production and sales volumes were at their the highest. Average unit other factory costs increased by 29.8 percent from 2017 to 2019 and were lower in interim 2020 than in interim 2019. Company-specific average unit other factory costs varied widely, with *** reporting the highest average other factory costs per unit among responding U.S. producers.

Direct labor represents the smallest shares of total COGS, ranging from 5.4 percent to 6.8 percent during the period for which data were collected. In absolute values, direct labor costs fluctuated from 2017 to 2019, reflecting the level of production and net sales. Average unit direct labor costs remained stable at \$26 to \$27 per-1,000 pounds during the period for which data were collected.

¹⁶ ***. ***, email to USITC staff, May 18, 2020.

¹⁷ 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.

Witness testified that wire rod prices do not really affect {Sumiden’s} final selling price, stating that Sumiden was able to raise PC strand selling prices when wire rod pricing were going down in summer of 2020 as a result of these investigations. Hearing transcript, p. 108 (Feitler).

¹⁸ Petitioners’ response to Commission questions, May 12, 2020, p. 7.

As presented in table VI-1, gross profit irregularly declined by 73.6 percent from 2017 to 2019 (\$35.2 million in 2017 up to \$36.8 million in 2018 and then down to \$9.3 million 2019). Gross margins consistently declined, from 11.9 percent in 2017 to 10.2 percent in 2018 and then down to 2.9 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. Gross profit and gross margins were both higher in interim 2020 than in interim 2019.

SG&A expenses and operating income or loss

As presented in table VI-1, U.S. producers' selling, general, and administrative ("SG&A") expense ratios (i.e., total SG&A expenses divided by net sales) declined each year from 6.4 percent in 2017 to 5.4 percent in 2019 but was higher in interim 2020 than in interim 2019. Table VI-3 shows that the pattern of company-specific SG&A expense ratios varied, with the *** U.S. producer *** reporting the lowest S&GA expense ratios and *** reporting the highest from 2017 to 2019. Total SG&A expenses fluctuated from 2017 to 2019 and were higher in interim 2020 than in interim 2019, with total and average unit SG&A expenses highest in 2018 when net sales were also high.

As presented in tables VI-1, U.S. producers' operating income decreased each year from \$16.1 million in 2017 to \$15.7 million in 2018, with an operating loss of \$8.2 million in 2019. Operating margins (i.e. operating income divided by net sales) also declined each year from 5.5 percent in 2017 to 4.3 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). Both operating income and margins were higher in interim 2020 than in interim 2019, reflecting the greater increase in sales relative to COGS and SG&A expenses in interim 2020.

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 and was higher in interim 2020 than in interim 2019.¹⁹ 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 shares of net income in 2017, 2018, and interim 2020, as well as largest shares of net losses in 2019.²⁰

¹⁹ *** reported non-recurring charges of \$*** classified all other expense in 2017 related to relocation and removal of equipment and \$*** classified in all other expenses in January-September 2020 related to ***.

²⁰ 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, research and development expenses, assets, and return on assets

Table VI-5 presents capital expenditures and research and development (“R&D”) expenses, assets, and return on assets (“ROA”) of U.S. producers. Table VI-6 provides the producers’ narrative responses regarding the nature and focus of their capital expenditures and substantial changes in assets.

Table VI-5
PC strand: Capital expenditures, R&D expenses, total assets, and ROA of U.S. producers, by firm, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Capital expenditures (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	36,113	8,423	13,797	11,302	3,724
	Research and development expenses (1,000 dollars)				
Bekaert	***	***	***	***	***
Insteel	***	***	***	***	***
Liberty	***	***	***	***	***
Sumiden	***	***	***	***	***
WMC	***	***	***	***	***
All firms	***	***	***	***	***
	Total net assets (1,000 dollars)				
Bekaert	***	***	***		
Insteel	***	***	***		
Liberty	***	***	***		
Sumiden	***	***	***		
WMC	***	***	***		
All firms	245,912	251,394	242,568		
	Operating return on assets (percent)				
Bekaert	***	***	***		
Insteel	***	***	***		
Liberty	***	***	***		
Sumiden	***	***	***		
WMC	***	***	***		
All firms	6.6	6.2	(3.4)		

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

Table VI-6
PC strand: Firms' narrative responses relating to capital expenditures and assets since January 1, 2017

Firm	Nature and focus of capital expenditures
Bekaert	***
Insteel	***
Liberty	***
Sumiden	***
WMC	***
	Substantial changes in net assets
Bekaert	***
Insteel	***
Liberty	***
Sumiden	***
WMC	***

Note: ***.

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

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		3
Negative effects on growth and development		1
Rejection of bank loans		1
Lowering of credit rating		1
Problem related to the issue of stocks or bonds		1
Ability to service debt		3
Other		4
Anticipated negative effects of imports		1

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
Cancellation, postponement, or rejection of expansion projects:	
***	***
***	***
Denial or rejection of investment proposal:	
***	***
Return on specific investments negatively impacted:	
***	***
***	***
Other negative effects on investments:	
***	***
***	***
***	***
Ability to service debt:	
***	***
***	***

Table continued on next page.

Table VI-8—Continued

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

Item / Firm	Narrative
Other effects on growth and development:	
***	***
***	***
***	***
***	***
Anticipated effects of imports:	
***	***
***	***
***	***

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

Part VII: Threat considerations and information on nonsubject countries

Section 771(7)(F)(i) of the Act (19 U.S.C. § 1677(7)(F)(i)) provides that—

In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors¹--

- (I) if a countervailable subsidy is involved, such information as may be presented to it by the administering authority as to the nature of the subsidy (particularly as to whether the countervailable subsidy is a subsidy described in Article 3 or 6.1 of the Subsidies Agreement), and whether imports of the subject merchandise are likely to increase,*
- (II) any existing unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports of the subject merchandise into the United States, taking into account the availability of other export markets to absorb any additional exports,*
- (III) a significant rate of increase of the volume or market penetration of imports of the subject merchandise indicating the likelihood of substantially increased imports,*
- (IV) whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices, and are likely to increase demand for further imports,*
- (V) inventories of the subject merchandise,*

¹ Section 771(7)(F)(ii) of the Act (19 U.S.C. § 1677(7)(F)(ii)) provides that “The Commission shall consider {these factors} . . . as a whole in making a determination of whether further dumped or subsidized imports are imminent and whether material injury by reason of imports would occur unless an order is issued or a suspension agreement is accepted under this title. The presence or absence of any factor which the Commission is required to consider . . . shall not necessarily give decisive guidance with respect to the determination. Such a determination may not be made on the basis of mere conjecture or supposition.”

- (VI) the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products,*
- (VII) in any investigation under this title which involves imports of both a raw agricultural product (within the meaning of paragraph (4)(E)(iv)) and any product processed from such raw agricultural product, the likelihood that there will be increased imports, by reason of product shifting, if there is an affirmative determination by the Commission under section 705(b)(1) or 735(b)(1) with respect to either the raw agricultural product or the processed agricultural product (but not both),*
- (VIII) the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and*
- (IX) any other demonstrable adverse trends that indicate the probability that there is likely to be material injury by reason of imports (or sale for importation) of the subject merchandise (whether or not it is actually being imported at the time).²*

Information on the nature of the subsidies was presented earlier in this report; information on the volume and pricing of imports of the subject merchandise is presented in Parts IV and V; and information on the effects of imports of the subject merchandise on U.S. producers' existing development and production efforts is presented in Part VI. Information on inventories of the subject merchandise; foreign producers' operations, including the potential for "product-shifting;" any other threat indicators, if applicable; and any dumping in third-country markets, follows. Also presented in this section of the report is information obtained for consideration by the Commission on nonsubject countries.

² Section 771(7)(F)(iii) of the Act (19 U.S.C. § 1677(7)(F)(iii)) further provides that, in antidumping investigations, ". . . the Commission shall consider whether dumping in the markets of foreign countries (as evidenced by dumping findings or antidumping remedies in other WTO member markets against the same class or kind of merchandise manufactured or exported by the same party as under investigation) suggests a threat of material injury to the domestic industry."

The industry in Argentina

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from Argentina.³ The Commission received a usable questionnaire response from one firm: Acindar I.A.A.S.A. ("Acindar").⁴ 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 accounted for *** production of PC strand in Argentina in 2019.⁵ Table VII-1 presents information on the PC strand operations of Acindar.

Table VII-1
PC strand: Summary data for Acindar, 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)
Acindar	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Acindar ***.

³ This firm was identified through a review of information submitted in the petition and contained in *** records.

⁴ Acindar is owned by ArcelorMittal. ArcelorMittal, "Locations," <https://corporate.arcelormittal.com/locations>, retrieved November 12, 2020.

⁵ 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. ArcelorMittal, "ArcelorMittal Acindar," <https://www.acindar.com.ar/2019/06/14/acindar-grupo-arcelormittal-presento-su-primer-reporte-integrado/>, retrieved November 12, 2020.

Operations on PC strand

Table VII-2 presents information on the PC strand operations of Acindar during 2017-19, interim 2019, interim 2020, and projections for 2020 and 2021. Acindar's capacity *** from 2017 to 2019, while its production and capacity utilization both fluctuated but increased by *** percent and *** percentage points, respectively.^{6 7} End-of-period inventories fluctuated and increased overall by *** percent during 2017-19 and are projected to increase during 2020 and 2021. Acindar's capacity, production, capacity utilization, and end-of-period inventories were all lower during interim 2020 than in interim 2019.⁸

From 2017 to 2019, Acindar's internal consumption/transfers and commercial home market shipments fluctuated but decreased by *** percent and *** percent, respectively. Total shipments fluctuated but increased by *** percent from 2017 to 2019 and are projected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021, ultimately ending below 2019 levels. Acindar's exports of PC strand to the United States increased *** and increased by *** percent during 2018-19, while its exports to all other markets increased by *** percent from 2017-19. As a share of total shipments, exports of PC strand 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 ***.^{9 10}

⁶ Acindar reported that ***. Email from ***, October 28, 2020.

⁷ Projections indicate that capacity is expected to ***, but Acindar projects capacity will *** in 2021, while production during 2020 and 2021 is projected to ***.

⁸ Acindar's capacity and production were *** percent and *** percent lower, respectively, in interim 2020 than in interim 2019.

⁹ Acindar's foreign producer questionnaire response, section II-8.

¹⁰ Acindar further ***. Email from ***, October 28, 2020.

Table VII-2

PC strand: Data for Acindar, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Argentina are Bolivia, Paraguay, and Uruguay (table VII-3). During 2019, the United States was the fourth largest export market for those exports from Argentina, accounting for 13.2 percent of exports by quantity, preceded by Bolivia, Paraguay, and Uruguay, accounting for 43.3 percent, 16.4 percent, and 14.6 percent, respectively.

Table VII-3
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Argentina by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	4,255	250	434
Bolivia	5,303	1,761	1,426
Paraguay	1,518	620	540
Uruguay	436	581	479
Chile	2,385	177	412
Brazil	5,509	824	---
Egypt	---	1	---
United Arab Emirates	24	0	---
Australia	---	---	---
All other destination markets	474	---	---
All destination markets	19,904	4,215	3,291
	Value (1,000 dollars)		
United States	6,757	412	547
Bolivia	2,719	1,021	682
Paraguay	1,075	567	318
Uruguay	556	659	484
Chile	827	143	191
Brazil	6,947	1,106	---
Egypt	---	2	---
United Arab Emirates	37	16	---
Australia	---	---	---
All other destination markets	575	0	---
All destination markets	19,493	3,926	2,223

Table continued on next page.

Table VII-3—Continued
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from
Argentina by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	1,588	1,647	1,262
Bolivia	513	580	478
Paraguay	708	913	589
Uruguay	1,276	1,134	1,010
Chile	347	806	464
Brazil	1,261	1,342	---
Egypt	---	3,597	---
United Arab Emirates	1,542	47,592	---
Australia	---	---	---
All other destination markets	1,212	---	---
All destination markets	979	932	675
	Share of quantity (percent)		
United States	21.4	5.9	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
Brazil	27.7	19.6	---
Egypt	---	0.0	---
United Arab Emirates	0.1	0.0	---
Australia	---	---	---
All other destination markets	2.4	---	---
All destination markets	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 Government of Argentina's INDEC – National Institute of Statistics & Census in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.¹¹ 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.¹² 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 2020.¹³ ProColombia estimated that consumption of metal products for structural use would increase in Colombia by 17.6 percent (from \$1.7 billion in 2013 to \$2.0 billion in 2018).¹⁴

Operations on PC strand

Petitioners identified two possible producers of PC strand in Colombia, Emcocables and Knight S.A.S. Emcocables operates a manufacturing facility in Cajicá, Colombia.¹⁵ No information was available regarding Knight S.A.S.'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.¹⁶

¹¹ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹² ProColombia is a Colombian government agency that promotes economic development by promoting Colombian exports and attracting foreign direct investment into Colombia.

¹³ ProColombia, "Building Materials Investment in Colombia," retrieved November 12, 2020. <https://investincolombia.com.co/sectors/manufacturing/building-materials.html>.

¹⁴ ProColombia, "Metalworking Investment in Colombia," retrieved November 12, 2020. <https://investincolombia.com.co/sectors/manufacturing/metalworking.html>.

¹⁵ Emcocables, "Contact Us," retrieved November 12, 2020. <http://en.emcocables.co/contac-us/>.

¹⁶ Emcocables, "Catalogs," retrieved November 12, 2020. <http://en.emcocables.co/catalogs-emcocables/>; and Emcocables, "Products for Prestressed Concrete," retrieved November 12, 2020. <http://en.emcocables.co/prestressed-concrete/>.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Colombia are the United States and Ecuador (table VII-4). During 2019, the United States was the top export market for those exports from Colombia, accounting for 50.3 percent of exports by quantity, followed by Ecuador, accounting for 30.6 percent.

Table VII-4
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Colombia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	0	153	37
Panama	512	26	17
All other destination markets	1,026	387	12
All destination markets	7,235	5,365	3,575
	Value (1,000 dollars)		
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	0	109	38
Panama	261	37	25
All other destination markets	578	279	28
All destination markets	4,919	4,276	3,278

Table continued on next page.

Table VII-4—Continued
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from
Colombia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	728	812	885
Ecuador	771	852	1,041
Peru	694	769	800
Chile	706	808	596
Bolivia	493	427	439
Mexico	782	786	1,006
Aruba	---	---	589
Dominican Republic	2,625	710	1,034
Panama	510	1,430	1,478
All other destination markets	564	721	2,272
All destination markets	680	797	917
	Share of quantity (percent)		
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	0.0	2.8	1.0
Panama	7.1	0.5	0.5
All other destination markets	14.2	7.2	0.3
All destination markets	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.

Note: Figures shown as "0" represent values greater than zero, but less than 500.

Source: Official exports statistics under HS subheading 7312.10 as reported by the Government of Colombia's Direccion de Impuestos y Aduanas Nacionales de Colombia – DIAN in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

The industry in Egypt

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from Egypt: United Wires ElSewedy Co. ("United Wires") and Arcons Egypt ("Arcons").^{17 18} United Wires provided a useable questionnaire response in the preliminary phase of these investigations, but did not provide a response in the final phase.¹⁹ United Wires' exports to the United States accounted for approximately *** U.S. imports of PC strand from Egypt in 2019. According to estimates request of the responding producer (United Wires), its production of PC strand in Egypt reported in its questionnaire response accounts for *** percent of overall production of PC strand in Egypt in 2019. Table VII-5 presents information on the PC strand operations of United Wire.

Table VII-5
PC strand: Summary data for United Wires, 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)
United Wires	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

¹⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

¹⁸ United Wires is a subsidiary of Elsewedy Electric. According to its website, Elsewedy Electric has an annual production capacity of 350,000 tons across 12 production facilities. Elsewedy Electric, "Wire & Cable," <https://www.elsewedyelectric.com/en/business-lines/wire-cable/>, retrieved December 14, 2020.

Arcons operates a facility in Inshas, Egypt. According to its website, Arcons has an annual production capacity of 7,000 tons at its Inshas factory. Arcons Egypt, "Arcons Factory," <https://arconsegypt.com/facilites/>, retrieved November 13, 2020.

¹⁹ The preliminary phase questionnaire collected data for 2017-19 and projection years 2020 and 2021. Staff estimated interim data for 2019 and 2020 by prorating data for calendar year 2019 and projection year 2020, respectively.

Changes in operations

United Wires ***.

Operations on PC strand

Table VII-6 presents information on the PC strand operations of United Wires during 2017-19, interim 2019, interim 2020, and projections for 2020 and 2021. United Wires' capacity and production increased *** and are projected to *** during 2020 and 2021. United Wires ***.

Exports to the United States increased *** and are projected to decrease *** in 2020 and 2021. Exports to all other markets were *** during 2017-19 and are projected to increase *** during 2020 and 2021. United Wire's home market shipments accounted for *** percent of its total shipments in 2019 and are projected to account for *** percent in 2020 and 2021. Other export markets identified by United Wires include ***.²⁰

²⁰ United Wires' foreign producer questionnaire response, section II-8. These are the primary export markets outside the United States ***. Ibid.

Table VII-6

PC strand: Data for United Wires, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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-7, United Wires produced other products on the same equipment and machinery used to produce PC strand.²¹ United Wires' overall production and capacity increased by *** percent during 2017-19.

Table VII-7
PC strand: United Wires' overall capacity and production on the same equipment as subject production, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Overall capacity	***	***	***	***	***
Production:					
PC Strand	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Egypt are the United States and Kenya (table VII-8). During 2019, the United States was the top export market for those exports from Egypt, accounting for 84.8 percent of exports by quantity, followed by Kenya, accounting for 10.6 percent.

²¹ On the same equipment and machinery used to produce PC strand, United Wires ***. United Wires' foreign producer questionnaire response, section II-3a.

Table VII-8
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Egypt by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	---	2,454	968,287
Kenya	---	---	121,254
Jordan	---	171,960	48,958
Morocco	882	28	2,556
United Kingdom	---	---	970
India	---	---	134
Netherlands	6,526	---	20
Belgium	20,900	130,447	---
Cote d'Ivoire	152	---	---
All other destination markets	942,085	325,235	---
All destination markets	970,545	630,124	1,142,179
	Value (1,000 dollars)		
United States	---	33,147	347,974
Kenya	---	---	42,644
Jordan	---	51,972	32,383
Morocco	6,828	417	2,508
United Kingdom	---	---	2,027
India	---	---	1,524
Netherlands	13,024	---	200
Belgium	23,030	322,338	---
Cote d'Ivoire	2	---	---
All other destination markets	813,890	196,809	---
All destination markets	856,774	604,683	429,260

Table continued on next page.

Table VII-8—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Egypt by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	---	13,507	359
Kenya	---	---	352
Jordan	---	302	661
Morocco	7,741	14,893	981
United Kingdom	---	---	2,090
India	---	---	11,373
Netherlands	1,996	---	10,000
Belgium	1,102	2,471	---
Cote d'Ivoire	13	---	---
All other destination markets	864	605	---
All destination markets	883	960	376
	Share of quantity (percent)		
United States	---	0.4	84.8
Kenya	---	---	10.6
Jordan	---	27.3	4.3
Morocco	0.1	0.0	0.2
United Kingdom	---	---	0.1
India	---	---	0.0
Netherlands	0.7	---	0.0
Belgium	2.2	20.7	---
Cote d'Ivoire	0.0	---	---
All other destination markets	97.1	51.6	---
All destination markets	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 import mirror statistics under HS subheading 7312.10 as reported by UN Comtrade in the Global Trade Atlas database, accessed October 22, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.²² Usable responses to the Commission's questionnaire were received from three firms: PT Sumiden Serasi Wire Products ("Sumiden Serasi"), PT Kingdom Indah ("Kingdom"), and PT Bumi Steel Indonesia ("Bumi"). These firms' exports to the United States accounted for approximately *** percent of U.S. imports of PC strand from Indonesia in 2019.²³ ***.²⁴ Table VII-9 presents information on the PC strand operations of the responding producers and exporters in Indonesia.

Table VII-9
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)
Bumi	***	***	***	***	***	***
Kingdom	***	***	***	***	***	***
Sumiden Serasi	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

²² These firms were identified through a review of information submitted in the petition and contained in *** records.

²³ ***. *** foreign producer questionnaire response, section II-8.

²⁴ ***. Email from *** October 22, 2020.

Changes in operations

As presented in table VII-10 producers in Indonesia reported operational and organizational changes since January 1, 2017.

Table VII-10
PC strand: Indonesian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Expansions:	
***	***
Revised labor agreements:	
***	***

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

Operations on PC strand

Table VII-11 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 but increased by *** percent. Indonesian producers' capacity was *** during interim 2020 *** January to September 2019, while their production was *** percent lower. Indonesian producers' capacity utilization fluctuated but increased by *** percentage points from 2017 to 2019, while end-of-period inventories fluctuated but decreased by *** percent during the same period.²⁵

Commercial home market shipments increased irregularly from 2017 to 2019 by *** percent. Similarly, total shipments increased irregularly by *** percent during the same period. Indonesian producers' exports of PC strand to the United States increased *** and further increased ***. Exports to the United States were *** percent lower during January to September 2020 than during interim 2019. While exports to the United States increased during 2017-19, Indonesian producers' exports to all other markets decreased *** and are projected to increase ***. As a share of total shipments, exports to the United

²⁵ Indonesian producers' production and end-of-period inventories were both lower in interim 2020 than in interim 2019. Projections indicate that capacity is expected to ***, while production is projected to decrease by *** percent from 2019 to 2020 then increase by *** percent from 2020 to 2021.

States increased *** percentage points during 2017-19.²⁶ Other export markets identified by the Indonesian producers included ***,²⁷

²⁶ Commercial home market shipments and exports to the United States were both lower during interim 2020 than in interim 2019, while exports to all other markets were higher.

²⁷ *** foreign producer questionnaire responses, section II-8. ***. *** foreign producer questionnaire response, section II-8.

Table VII-11

PC strand: Data for producers in Indonesia, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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.

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

Alternative products

The three Indonesian producers ***.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Indonesia are Thailand, the United States, and Japan (table VII-12). During 2019, the United States was the second largest export market for those exports from Indonesia, accounting for 27.3 percent of exports by quantity, preceded by Thailand, accounting for 28.1 percent.

Table VII-12
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Indonesia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	1,792	3,855
All destination markets	109,972	140,284	151,475
	Value (1,000 dollars)		
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	2,338
All destination markets	90,929	108,203	109,582

Table continued on next page.

Table VII-12—Continued
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from
Indonesia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
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	---	680	648
All other destination markets	2,329	1,810	607
All destination markets	827	771	723
	Share of quantity (percent)		
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
All destination markets	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 October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.²⁸ Usable responses to the Commission's questionnaire were received from two firms: WBO Italcables Societa' Cooperativa ("WBO Italcables"),²⁹ Trafilerie Meridionali SPA ("Trafilerie"), and CB Trafilati Acciai S.p.A. ("Trafilati").³⁰ These firms' exports to the United States accounted for *** U.S. imports of PC strand from Italy in 2019. According to estimates requested of the responding Italian producers, the production of PC strand in Italy reported in questionnaires accounts for *** production of PC strand in Italy during 2019.³¹ Table VII-13 presents information on the PC strand operations of the responding producers and exporters in Italy.

Table VII-13
PC strand: Summary data for producers in Italy, 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)
Trafilerie	***	***	***	***	***	***
Trafilati	***	***	***	***	***	***
WBO Italcables	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

²⁸ These firms were identified through a review of information submitted in the petition and contained in *** records.

²⁹ According to its website, WBO Italcables has an annual production capacity of 60,000 tons. WBO Italcables Società Cooperativa, "WBO Italcables," http://www.wboitalcables.it/eng/index.php?option=com_sppagebuilder&view=page&id=2&Itemid=108, retrieved December 14, 2020.

³⁰ Trafilati provided a useable questionnaire response in the preliminary phase of these investigations, but did not provide a response in the final phase. The preliminary phase questionnaire collected data for 2017-19 and projection years 2020 and 2021. Staff estimated interim data for 2019 and 2020 by prorating data for calendar year 2019 and projection year 2020, respectively.

³¹ ***. *** foreign producer questionnaire response, section II-6a.

Changes in operations

As presented in table VII-14 producers in Italy reported operational and organizational changes since January 1, 2017.

Table VII-14
PC strand: Italian producers' reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Relocations:	
***	***
Other:	
***	***

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

Operations on PC strand

Table VII-15 presents information on the PC strand operations of the responding producers and exporters in Italy during 2017-19, interim 2019, interim 2020, and projections for 2020 and 2021. During 2017-19, Italian producers' capacity increased by *** percent and is projected to increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021.³² PC strand production and capacity utilization decreased by *** percent and *** percentage points, respectively, from 2017 to 2019.³³ During the same period, Italian producers' end-of-period inventories increased by *** percent. Italian producers' capacity and production were *** percent and *** percent higher, respectively, during interim 2020 than in interim 2019, while their end-of-period inventories were *** percent lower.

³² WBO Italcables reported ***. Email from ***, October 22, 2020.

³³ Italian producers' PC strand production is projected to increase by *** percent from 2019 to 2020 and increase by *** percent from 2020 to 2021.

Table VII-15

PC strand: Data for producers in Italy, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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.

From 2017 to 2019, commercial home market shipments increased by *** percent and are projected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021, ultimately projected to end above 2019 levels. During 2017-19, Italian producers' total shipments decreased by *** percent and are projected to increase by *** percent from 2019 to 2020 and then further increase by *** percent from 2020 to 2021. Commercial home market shipments were *** percent lower during interim 2020 than in interim 2019, while total shipments were *** percent higher. Italian producers' exports of PC

strand to the United States increased irregularly by *** percent from 2017 to 2019 and are projected to decrease by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021. Moreover, their exports of PC strand to the United States were *** percent lower during interim 2020 than in interim 2019. Italian producers' exports to all other markets decreased by *** percent during 2017-19 and are projected to increase by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021. Exports to all other markets were *** percent higher during interim 2020 than in interim 2019. As a share of total shipments, exports to the United States fluctuated but increased by *** percentage points during 2017-19. Exports to all other markets as a share of total shipments decreased by *** percentage points from 2017 to 2019. Similarly, total exports as a share of total shipments decreased by *** percentage points during the same period. Other export markets identified by responding Italian producers included ***.^{34 35}

Alternative products

Responding Italian producers indicated ***.³⁶

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Italy are the

³⁴ *** foreign producer questionnaire responses, section II-8; and email from ***, November 4, 2020.

³⁵ WBO Italcables ***. Email from ***, October 22, 2020.

³⁶ ***. *** foreign producer questionnaire response, section II-4.

United States, Poland, Spain, and France (table VII-16). During 2019, the United States was the top export market for those exports from Italy, accounting for 14.0 percent of exports by quantity, followed by Poland and Spain, accounting for 11.5 percent and 10.5 percent, respectively.

Table VII-16
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Italy by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	106,080	90,225	68,577
All destination markets	287,571	267,175	221,953
	Value (1,000 dollars)		
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	103,172	108,957	81,286
All destination markets	227,083	251,285	196,283

Table continued on next page.

Table VII-16—Continued**Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Italy by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	551	740	607
Poland	863	994	975
Spain	1,025	1,115	1,039
France	685	761	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
All destination markets	790	941	884
	Share of quantity (percent)		
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
All destination markets	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 October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.³⁷ 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 estimates requested of the responding Malaysian producers, 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-17 presents information on the PC strand operations of the responding producers and exporters in Malaysia.

Table VII-17
PC strand: Summary data for producers in Malaysia, 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)
Kiswire	***	***	***	***	***	***
Wei Dat	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

As presented in table VII-18 producers in Malaysia reported several operational and organizational changes since January 1, 2017.

³⁷ These firms were identified through a review of information submitted in the petition and contained in *** records.

Table VII-18

PC strand: Malaysian producers' reported changes in operations, since January 1, 2017

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

Note: Kiswire indicated that ***. Email from ***, October 22, 2020.

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

Operations on PC strand

Table VII-19 presents information on the PC strand operations of the responding producers and exporters in Malaysia. Malaysian producers' capacity and production increased by *** percent and *** percent, respectively, during 2017-19.³⁸ ***. End-of-period inventories increased by *** percent from 2017 to 2019. Malaysian producers reported greater capacity, production, and end-of-period inventories in interim 2020 than in interim 2019.

Malaysian producers' total shipments increased by *** percent from 2017 to 2019. Exports of PC strand to the United States increased by *** percent over the same period. As a share of total shipments, exports to the United States decreased by *** percentage points during 2017-19. Exports to all other markets as a share of total shipments increased by *** percentage points from 2017 to 2019 and total exports as a share of total shipments increased by *** percentage points to *** percent in 2019. Other export markets identified by Malaysian producers included ***.³⁹

³⁸ Projections indicate that capacity and end-of-period inventories are expected to increase from 2019 levels during 2020 and 2021, while production is projected to increase irregularly.

³⁹ *** foreign producer questionnaire responses, section II-8. *** further reported that ***. Email from ***, November 2, 2020.

Table VII-19

PC strand: Data for producers in Malaysia, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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-20, responding Malaysian firms produced other products on the same equipment and machinery used to produce PC strand.⁴⁰ As a share of reported production, PC strand accounted for *** of production during 2017-19.

Table VII-20
PC strand: Malaysian producers' overall capacity and production on the same equipment as subject production, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Overall capacity	***	***	***	***	***
Production:					
PC strand	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Malaysia are the United States, Korea, and Singapore (table VII-21). During 2019, the United States was the top export market for those exports from Malaysia, accounting for 33.2 percent of exports by quantity, followed by Korea and Singapore, accounting for 17.2 and 8.7 percent, respectively.

⁴⁰ On the same equipment and machinery used to produce PC strand, ***. *** foreign producer questionnaire response, section II-3a.

Table VII-21**Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Malaysia by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	54,255
All destination markets	248,637	224,304	271,008
	Value (1,000 dollars)		
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	42,645	38,805
All destination markets	129,462	132,602	157,537

Table continued on next page.

Table VII-21—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Malaysia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	384	474	487
Korea	845	771	499
Singapore	454	620	678
Thailand	665	658	794
Indonesia	570	601	666
Netherlands	758	841	795
New Zealand	326	360	357
Taiwan	386	472	393
Turkey	558	483	469
All other destination markets	633	722	715
All destination markets	521	591	581
	Share of quantity (percent)		
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
All destination markets	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 the Government of Malaysia's Department of Statistics Malaysia in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

The industry in the Netherlands

The Commission issued foreign producers' or exporters' questionnaires to one firm believed to produce and/or export PC strand from the Netherlands.⁴¹ The Commission received a usable questionnaire response from one firm: Nedri Spanstaal B.V. ("Nedri"). This firm's exports to the United States accounted for *** U.S. imports of PC strand from the Netherlands in 2019. According to Nedri's estimates, its production accounted 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, 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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Nedri ***.

⁴¹ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on PC strand

Table VII-23 presents information on the PC strand operations of Nedri. Production capacity *** from 2017 to 2019 and is projected to *** during 2020 and 2021. Nedri's PC strand production and capacity utilization decreased by *** percent and *** percentage points, respectively, during 2017-19.⁴² End-of-period inventories fluctuated but decreased by *** percent from 2017 to 2019 and are projected to *** during 2020 and 2021.

Nedri's commercial home market shipments and total shipments decreased by *** percent and *** percent, respectively, from 2017 to 2019. Exports of PC strand to the United States fluctuated but increased by *** percent during 2017-19.⁴³ Nedri's exports to the United States were *** percent lower during interim 2020 than in interim 2019, while its exports to all other markets were *** percent higher. As a share of total shipments, Nedri's exports of PC strand 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 fluctuated but decreased by *** percentage points from 2017 to 2019. During the same period, total exports as a share of total shipments fluctuated and increased by *** percentage points. Other export markets identified by Nedri included ***.^{44 45}

⁴² Projections indicate that production is expected to increase by *** percent from 2019 to 2020 and then by *** percent from 2020 to 2021. Similarly, capacity utilization is projected to increase by *** percentage points from 2019 levels during 2021.

⁴³ Nedri projects that its commercial home market shipments will increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021, while its exports of PC strand to the United States are projected to decrease by *** percent from 2019 to 2020 and ***.

⁴⁴ Nedri's foreign producer questionnaire response, section II-8.

⁴⁵ Nedri ***. Email from ***, October 21, 2020.

Table VII-23

PC strand: Data for Nedri, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from the Netherlands are Germany and Luxembourg (table VII-24). During 2019, Germany was the top export market for those exports from the Netherlands, accounting for 56.1 percent of exports by quantity, followed by Luxembourg, accounting for 9.1 percent, while the United States was one of the Netherlands's smaller export markets, accounting for 0.6 percent.

Table VII-24
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from the Netherlands by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	3,805	156	471
Germany	19,551	36,693	47,826
Luxembourg	2,021	14,637	7,740
United Kingdom	6,933	4,809	3,125
Belgium	2,896	2,718	2,494
France	2,292	3,015	1,578
Norway	1,205	2,078	1,470
Italy	2,689	1,947	1,378
Poland	3,102	1,668	1,262
All other destination markets	31,002	21,833	17,832
All destination markets	75,495	89,554	85,177
	Value (1,000 dollars)		
United States	3,630	855	1,785
Germany	21,626	38,966	47,334
Luxembourg	1,630	11,381	4,961
United Kingdom	7,820	6,538	4,080
Belgium	4,357	4,814	4,179
France	4,296	6,439	3,545
Norway	1,768	6,173	2,298
Italy	2,967	2,694	2,000
Poland	3,463	2,828	2,089
All other destination markets	44,712	39,358	32,612
All destination markets	96,268	120,046	104,883

Table continued on next page.

Table VII-24—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from the Netherlands by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	954	5,482	3,789
Germany	1,106	1,062	990
Luxembourg	807	778	641
United Kingdom	1,128	1,359	1,306
Belgium	1,504	1,771	1,675
France	1,874	2,136	2,247
Norway	1,467	2,971	1,563
Italy	1,103	1,384	1,451
Poland	1,117	1,695	1,655
All other destination markets	1,442	1,803	1,829
All destination markets	1,275	1,340	1,231
	Share of quantity (percent)		
United States	5.0	0.2	0.6
Germany	25.9	41.0	56.1
Luxembourg	2.7	16.3	9.1
United Kingdom	9.2	5.4	3.7
Belgium	3.8	3.0	2.9
France	3.0	3.4	1.9
Norway	1.6	2.3	1.7
Italy	3.6	2.2	1.6
Poland	4.1	1.9	1.5
All other destination markets	41.1	24.4	20.9
All destination markets	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 October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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: Al Faisal Steel Products Company ("Al Faisal") and National Metal Manufacturing & Casting Co. (Maadaniyah) ("National Metal").⁴⁶ ⁴⁷ Al Faisal and National Metal provided useable questionnaire responses in the preliminary phase of these investigations, but did not provide responses in the final phase.⁴⁸ 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 their questionnaires accounts for approximately *** percent of overall PC strand production in Saudi Arabia in 2019. Table VII-25 presents information on the PC strand operations of the responding producers and exporters in Saudi Arabia.

⁴⁶ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁴⁷ Al Faisal was established in 2006 as a downstream steel producer with operations in Dammam, Saudi Arabia by Al-Ittefaq Steel Products Company, which advertises itself as one of the largest steel manufacturers in the Persian Gulf region and the largest private sector steel manufacturer in Saudi Arabia. Al-Ittefaq Steel, "Overview," <https://www.ispc.com.sa/Overview.aspx>, retrieved November 12, 2020; and Al-Ittefaq Steel, "Dammam," <http://www.ispc.com.sa/Dammam-D.aspx>, retrieved November 12, 2020.

According to National Metal's website, one of its business units, Aslak, is a leading major manufacturer of steel wire products in Saudi Arabia, including PC strand, with an annual production capacity of 200 million pounds. National Metal, "Overview," <https://www.maadaniyah.com/en/about-us/overview>, retrieved November 12, 2020; and Aslak, "Capabilities," <https://www.aslak.com.sa/plant/capabilities>, retrieved November 12, 2020.

⁴⁸ The preliminary phase questionnaire collected data for 2017-19 and projection years 2020 and 2021. Staff estimated interim data for 2019 and 2020 by prorating data for calendar year 2019 and projection year 2020, respectively.

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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

The two responding Saudi producers ***.

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, interim 2019, interim 2020, and projections for 2020 and 2021. Capacity *** from 2017 to 2019 and is projected to *** during 2020 and 2021. Production decreased irregularly by *** percent during 2017-19, was *** percent higher in interim 2020 compared to interim 2019, and is projected to increase by *** percent from 2019 to 2020 and then further increase by *** percent from 2020 to 2021. End-of-period inventories fluctuated and increased by *** percent from 2017 to 2019 and are projected to decrease by *** percent from 2019 levels during 2020 and 2021.

Saudi producers' commercial home market shipments decreased by *** percent during 2017-19 and are projected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021. Exports of PC strand to the United States increased *** and then decreased ***. Exports to all other markets fluctuated but decreased during 2017-19 by *** percent. ***. Projections indicate that both exports to the United States and exports to all other markets are expected to increase from 2019 levels during 2020 and 2021.

Table VII-26

PC strand: Data for producers in Saudi Arabia, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 Saudi producers indicated ***.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Saudi Arabia are the United States and Jordan (table VII-27). During 2019, the United States was the top export market for those exports from Saudi Arabia, accounting for 81.0 percent of exports by quantity, followed by Jordan, accounting for 17.7 percent.

Table VII-27

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Saudi Arabia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	7,732	25,898	4,551
Jordan	1,409	1,899	997
Yemen	---	1	57
Germany	1	5	11
Pakistan	11	27	1
UAE	3,360	882	---
Oman	3,053	523	---
Qatar	2,460	---	---
All other destination markets	2,087	1,500	0
All destination markets	20,113	30,736	5,617
	Value (1,000 dollars)		
United States	2,304	9,678	1,944
Jordan	553	881	424
Yemen	---	4	15
Germany	1	3	7
Pakistan	30	68	1
UAE	2,129	848	---
Oman	1,442	566	---
Qatar	1,378	---	---
All other destination markets	2,977	1,552	2
All destination markets	10,815	13,600	2,394

Table continued on next page.

Table VII-27—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Saudi Arabia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	298	374	427
Jordan	393	464	425
Yemen	---	3,245	272
Germany	929	684	643
Pakistan	2,636	2,468	1,368
UAE	634	961	---
Oman	472	1,081	---
Qatar	560	---	---
All other destination markets	1,427	1,035	7,427
All destination markets	538	442	426
	Share of quantity (percent)		
United States	38.4	84.3	81.0
Jordan	7.0	6.2	17.7
Yemen	---	0.0	1.0
Germany	0.0	0.0	0.2
Pakistan	0.1	0.1	0.0
UAE	16.7	2.9	---
Oman	15.2	1.7	---
Qatar	12.2	---	---
All other destination markets	10.4	4.9	0.0
All destination markets	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.

Note: Figures shown as "0" represent values greater than zero, but less than 500.

Source: Official exports statistics under HS subheading 7312.10 as reported by UN Comtrade in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁴⁹ The Commission received a usable questionnaire response from one firm: Scaw Metals Group - Haggie Wire & Strand Operations ("Scaw").⁵⁰ 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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Scaw ***.

⁴⁹ These firms were identified through a review of information submitted in the petition and contained in *** records.

⁵⁰ According to its website, Scaw is the only PC strand producer in South Africa, and a significant portion of its production is exported worldwide. Scaw's Wire & Strand Division is located in Germiston near Johannesburg. Scaw Metals Group, "Wire Rod Products," retrieved November 13, 2020. <http://www.scaw.co.za/Pages/Wire-rod-products.aspx>.

Operations on PC strand

Table VII-29 presents information on the PC strand operations of Scaw. During 2017-19, Scaw's production capacity *** and it is projected to *** during 2020 and 2021. Its PC strand production and capacity utilization decreased by *** percent and *** percentage points, respectively, from 2017 to 2019.⁵¹ Scaw's production was *** percent lower in interim 2020 than in interim 2019. End-of-period inventories *** during 2017-19 and are projected to decrease by *** percent from 2019 to 2020, but then increase by *** percent from 2020 to 2021, ultimately ending below 2019 levels.

Commercial home market shipments decreased by *** percent during 2017-19 and were *** percent higher in interim 2020 than in interim 2019. Scaw's exports of PC strand to the United States fluctuated but decreased by *** percent during 2017-19 and are projected to decrease by *** percent from 2019 to 2020, but then increase by *** percent from 2020 to 2021, ending *** 2019 levels. As a share of total shipments, exports of PC strand to the United States fluctuated and increased by *** percentage points from 2017 to 2019. Exports to all other markets as a share of total shipments fluctuated but decreased by *** percentage points during 2017-19. As a share of total shipments, total exports decreased from *** percent in 2017 to *** in 2018, then returning to *** percent in 2019. Other export markets identified by Scaw included ***.⁵²

⁵¹ Scaw's production is projected to decrease by *** from 2019 to 2020 and then increase by *** percent from 2020 to 2021.

⁵² Scaw's foreign producer questionnaire response, section II-8. Scaw ***. Email from ***, November 6, 2020.

Table VII-29

PC strand: Data for Scaw, 2017-2019, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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.⁵³

Table VII-30

PC strand: Scaw's overall capacity and production on the same equipment as subject production, 2017-2019, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
Overall capacity	***	***	***	***	***
Production:					
PC Strand	***	***	***	***	***
Out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	Ratios and shares (percent)				
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from South Africa are the United States, Australia, and Brazil (table VII-31). During 2019, the United States was the top export market for those exports from South Africa, accounting for 46.8 percent of exports by quantity, followed by Australia and Brazil, accounting for 10.3 percent and 9.6 percent, respectively.

⁵³ On the same equipment and machinery used to produce PC strand, Scaw produced ***. Scaw's foreign producer questionnaire response, section II-3a.

Table VII-31

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from South Africa by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	7,186	9,504	5,951
All destination markets	52,732	53,299	47,737
	Value (1,000 dollars)		
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	13,265	6,928
All destination markets	31,971	43,306	34,291

Table continued on next page.

Table VII-31—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from South Africa by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	375	463	413
Australia	691	833	762
Brazil	342	407	381
Zambia	1,151	1,413	1,524
Zimbabwe	1,354	1,526	1,329
Namibia	990	1,019	1,212
Singapore	1,114	808	517
Canada	1,737	1,554	1,658
Swaziland	1,084	1,045	713
All other destination markets	1,061	1,396	1,164
All destination markets	606	813	718
	Share of quantity (percent)		
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
All destination markets	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 Government of South Africa's Revenue Service in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁵⁴ The Commission received a usable questionnaire response from one firm: TYCSA (Trenzas y Cables de Acero) - GSSP ("TYCSA"). This firm's exports to the United States accounted for approximately *** U.S. imports of PC strand from Spain in 2019. According to estimates requested of the responding producer (TYCSA), its production of PC strand in Spain reported in its questionnaire accounts for approximately *** percent of overall production of PC strand in Spain in 2019. Table VII-32 presents information on the PC strand operations of TYCSA.

Table VII-32
PC strand: Summary data for TYCSA, 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)
TYCSA	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

TYCSA ***.

⁵⁴ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on PC strand

Table VII-33 presents information on the PC strand operations of TYCSA. During 2017-19, TYCSA's production capacity increased by *** percent and is projected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021.⁵⁵ Its PC strand production increased by *** percent from 2017 to 2019 and is projected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021. End-of-period inventories fluctuated but increased by *** percent during 2017-19 and are also projected to increase irregularly from 2019 levels during 2020 and 2021. TYCSA's capacity, production, and end-of-period inventories were all lower during interim 2020 than in interim 2019.

During 2017-19 TYCSA's exports of PC strand to the United States fluctuated and increased by *** percent and are projected to decrease by *** percent from 2019 to 2020 and further decrease by *** percent from 2020 to 2021. Total shipments increased by *** percent from 2017 to 2019 and are projected to increase irregularly from 2019 levels during 2020 and 2021. As a share of total shipments, TYCSA's exports to the United States fluctuated and increased by *** percentage points during 2017-19, while its exports to all other markets as a share of total shipments fluctuated but decreased by *** percentage points.⁵⁶ Other export markets identified by TYCSA included ***.⁵⁷

⁵⁵ TYCSA attributes increases in its production capacity during 2017-19 to ***. Email from ***, October 20, 2020.

⁵⁶ This is consistent with ***. Ibid.

⁵⁷ TYCSA's foreign producer questionnaire response, section II-8. TYCSA ***. Email from ***, October 20, 2020.

Table VII-33

PC strand: Data for TYCSA, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 ***.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Spain are Portugal, the United States, France, and Morocco (table VII-34). During 2019, the United States was the second largest export market for those exports from Spain, accounting for 13.1 percent of exports by quantity, preceded by Portugal, accounting for 28.2 percent.

Table VII-34

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Spain by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	6,302	11,764	15,257
Portugal	21,180	23,894	32,819
France	14,933	13,671	14,600
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	18,504	20,567	17,688
All destination markets	100,288	110,989	116,259
	Value (1,000 dollars)		
United States	6,304	14,794	18,422
Portugal	17,796	20,625	24,912
France	15,407	15,840	15,565
Morocco	5,823	9,802	7,991
Italy	9,824	8,677	11,624
Germany	6,710	5,864	3,671
Luxembourg	10,534	6,794	2,714
Chile	267	737	1,302
Brazil	569	1,611	818
All other destination markets	19,927	24,963	21,732
All destination markets	93,160	109,707	108,751

Table continued on next page.

Table VII-34—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Spain by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	1,000	1,258	1,207
Portugal	840	863	759
France	1,032	1,159	1,066
Morocco	729	667	610
Italy	897	956	1,032
Germany	876	1,006	961
Luxembourg	845	967	976
Chile	1,148	715	473
Brazil	7,903	470	374
All other destination markets	1,077	1,214	1,229
All destination markets	929	988	935
	Share of quantity (percent)		
United States	6.3	10.6	13.1
Portugal	21.1	21.5	28.2
France	14.9	12.3	12.6
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
All destination markets	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 October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁵⁸ The Commission received a usable questionnaire response from one firm: Chia Ta World Co., Ltd. ("Chia"). This firm's exports to the United States accounted for approximately *** U.S. imports of PC strand from Taiwan in 2019. According to estimates requested of the responding producer (Chia), the production of PC strand in Taiwan reported in questionnaires accounts for approximately *** percent of overall production of PC strand in Taiwan. 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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Chia ***.

⁵⁸ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on PC strand

Table VII-36 presents information on the PC strand operations of Chia. During 2017-19, Chia's production capacity *** and it is projected to *** in 2020 and 2021. Its PC strand production fluctuated but decreased by *** percent from 2017 to 2019 and capacity utilization also fluctuated but decreased by *** percentage points during the same period.⁵⁹

Chia's commercial home market shipments decreased by *** percent during 2017-19 and were *** percent lower in interim 2020 than in interim 2019. Total shipments fluctuated but decreased by *** percent from 2017 to 2019. Exports of PC strand to the United States fluctuated and increased by *** percent during the same period. As a share of total shipments, exports to the United States fluctuated and increased by *** percentage points during 2017-19. Chia ***.

⁵⁹ Projections indicate that production is expected to decrease by *** percent from 2019 to 2020 and further decrease by *** percent from 2020 to 2021. Similarly, Chia projects that exports of PC strand to the United States will decrease by *** percent from 2019 to 2020 and then ***.

Table VII-36

PC strand: Data for Chia, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes 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 those exports from Taiwan, accounting for 5.1 percent of exports by quantity, preceded by Japan and China, accounting for 51.9 percent and 16.0 percent, respectively.

Table VII-37

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Taiwan by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	1,495	1,179	1,168
All destination markets	15,794	11,992	13,374
	Value (1,000 dollars)		
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	2,794
All destination markets	15,890	14,299	16,402

Table continued on next page.

Table VII-37—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Taiwan by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	2,222	2,957	3,073
Japan	957	1,035	1,069
China	1,150	1,113	977
Thailand	860	840	849
Vietnam	411	693	807
Myanmar	862	848	932
Pakistan	215	117	84
Korea, South	1,491	1,559	1,382
Philippines	878	616	938
All other destination markets	1,662	2,067	2,392
All destination markets	1,006	1,192	1,226
	Share of quantity (percent)		
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
All destination markets	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 the Government of Taiwan's Directorate General of Customs in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁶⁰ The Commission received a usable questionnaire response from one firm: Maklada Industries & Maklada SA ("Maklada"). This firm's exports to the United States accounted for approximately *** U.S. imports of PC strand from Tunisia in 2019. According to estimates requested of the responding producer (Maklada), the 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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

Maklada ***.

⁶⁰ This firm was identified through a review of information submitted in the petition and contained in *** records.

Operations on PC strand

Table VII-39 presents information on the PC strand operations of Maklada. During 2017-19, Maklada's capacity *** and it is projected to *** in 2020 and 2021. Its PC strand production and capacity utilization decreased by *** percent and *** percentage points, respectively, from 2017 to 2019. Maklada's capacity was *** during interim 2020 than in interim 2019, while its production and capacity utilization were, respectively, *** percent and *** percentage points lower. Maklada's end-of-period inventories *** during 2017-19 and were *** percent lower during interim 2020 than in interim 2019.⁶¹

Commercial home market shipments fluctuated but decreased by *** percent from 2017 to 2019 and were *** percent higher during interim 2020 than in interim 2019. Maklada's exports of PC strand to the United States decreased by *** percent during 2017-19 and were *** percent lower during interim 2020 than in interim 2019. Total shipments decreased by *** percent from 2017 to 2019.⁶² Exports accounted for *** of total shipments from 2017 to 2019 and are projected to account for *** of total shipments in 2020 and 2021. As a share of total shipments, exports of PC strand to the United States increased by *** percentage points during 2017-19, while exports to all other markets and total exports decreased by *** percentage points and *** percentage points, respectively. Other export markets identified by Maklada included ***.^{63 64}

⁶¹ Projections indicate that production is expected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021, while end-of-period inventories are projected to increase by *** percent from 2019 to 2020 and then decrease by *** percent from 2020 to 2021.

⁶² Projections indicate that commercial home market shipments are expected to increase by *** percent from 2019 to 2020 and ***, while total shipments are expected to increase irregularly during 2020 and 2021.

Maklada's exports of PC strand to the United States are expected to decrease by *** percent from 2019 to 2020 and then increase by *** percent from 2020 to 2021, ***.

⁶³ Maklada's foreign producer questionnaire response, section II-8.

⁶⁴ Maklada ***. Email from ***, November 4, 2020.

Table VII-39

PC strand: Data for Maklada, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Tunisia are the United States, the United Arab Emirates, and Egypt (table VII-40). During 2019, the United States was the top export market for those exports from Tunisia, accounting for 62.5 percent of exports by quantity, followed by the United Arab Emirates, accounting for 8.8 percent.

Table VII-40

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Tunisia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	33,962	31,015	27,413
United Arab Emirates	3,934	4,212	3,867
Egypt	1,900	6,217	3,729
Qatar	3,142	1,570	3,471
Morocco	3,798	3,094	1,785
Malta	---	168	847
Lebanon	110	636	793
Oman	1,748	442	530
France	78	886	529
All other destination markets	10,594	4,395	877
All destination markets	59,266	52,636	43,842
	Value (1,000 dollars)		
United States	12,054	13,964	10,655
United Arab Emirates	1,410	1,782	1,541
Egypt	715	2,753	1,524
Qatar	1,199	708	1,338
Morocco	1,411	1,467	677
Malta	---	75	334
Lebanon	45	257	298
Oman	606	177	228
France	138	500	246
All other destination markets	4,154	2,406	1,250
All destination markets	21,731	24,089	18,091

Table continued on next page.

Table VII-40—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Tunisia by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	355	450	389
United Arab Emirates	358	423	399
Egypt	376	443	409
Qatar	382	451	385
Morocco	372	474	379
Malta	---	448	394
Lebanon	406	405	376
Oman	347	401	430
France	1,776	564	465
All other destination markets	392	547	1,425
All destination markets	367	458	413
	Share of quantity (percent)		
United States	57.3	58.9	62.5
United Arab Emirates	6.6	8.0	8.8
Egypt	3.2	11.8	8.5
Qatar	5.3	3.0	7.9
Morocco	6.4	5.9	4.1
Malta	---	0.3	1.9
Lebanon	0.2	1.2	1.8
Oman	2.9	0.8	1.2
France	0.1	1.7	1.2
All other destination markets	17.9	8.4	2.0
All destination markets	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 UN Comtrade in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁶⁵ Usable responses to the Commission's questionnaire were received from three firms: Güney Çelik Hasir ve Demir Mam. San. Tic. A.Ş. ("Güney Çelik"), Has Çelik ve Halat San. Tic. A.Ş. ("Has Çelik"), and Çelik Halat ve Tel Sanayii AŞ ("Çelik Halat"). These firms' exports to the United States accounted for approximately *** U.S. imports of PC strand from Turkey in 2019. According to estimates requested of the responding Turkish producers, the production of PC strand in Turkey reported in questionnaires accounts for approximately *** percent of overall production of PC strand in Turkey during 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

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)
Has Çelik	***	***	***	***	***	***
Güney Çelik	***	***	***	***	***	***
Çelik Halat	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

⁶⁵ These firms were identified through a review of information submitted in the petition and contained in *** records.

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: Turkish producers' reported changes in operations, since January 1, 2017

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

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

Operations on PC strand

Table VII-43 presents information on the PC strand operations of the responding producers and exporters in Turkey. Turkish producers' capacity increased by *** percent from 2017 to 2019, was *** during interim 2020 than in interim 2019, and is projected to *** during 2020 and 2021. The increase in capacity during 2017-19 is consistent with ***. From 2017 to 2019, Turkish producers' PC strand production decreased by *** percent and was *** percent higher during interim 2020 than in interim 2019. Production is projected to increase by *** percent from 2019 to 2020 and then by *** percent from 2020 to 2021. Capacity utilization decreased by *** percentage points from 2017 to 2019 and is projected to increase from 2019 levels during 2020 and 2021. Turkish producers' end-of-period inventories fluctuated and increased by *** percent during 2017-19.⁶⁶

Turkish producers' commercial home market shipments decreased by *** percent from 2017 to 2019. During the same period, total shipments fluctuated but decreased by *** percent. Turkish producers' exports of PC strand to the United States increased by ***

⁶⁶ Turkish producers' capacity utilization and end-of-period inventories were both higher in interim 2020 than in interim 2019.

percent from 2017 to 2019, were *** percent lower during interim 2020 than in interim 2019, and are projected to decrease by *** from 2019 to 2020 and decrease *** in 2021. As a share of total shipments, exports to the United States fluctuated and increased by *** percentage points during 2017-19. Exports to all other markets as a share of total shipments increased by *** percent from 2017 to 2019 and total exports as a share of total shipments increased by *** percent. During the same period, commercial home market shipments as a share of total shipments decreased by *** percentage points. Other export markets identified by Turkish producers included ***.⁶⁷

⁶⁷ *** foreign producer questionnaire responses, section II-8; and Email from ***, October 22, 2020.

***. Email from ***, November 5, 2020.

***. Email from ***, October 22, 2020.

***. Email from ***, October 22, 2020.

Table VII-43

PC strand: Data for producers in Turkey, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 three Turkish producers indicated ***.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Turkey are the United States, Belgium, Egypt, and Mexico (table VII-44). During 2019, the United States was the top export market for those exports from Turkey, accounting for 26.4 percent of exports by quantity, followed by Belgium, accounting for 9.0 percent.

Table VII-44
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Turkey
by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	35,402	41,115	60,980
Belgium	16,308	18,442	20,800
Egypt	11,351	13,494	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	3,057	4,303	7,092
Germany	13,072	7,005	7,022
All other destination markets	49,976	61,284	79,532
All destination markets	154,122	179,844	230,676
	Value (1,000 dollars)		
United States	12,206	19,469	26,905
Belgium	13,354	17,681	18,471
Egypt	14,737	16,585	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	1,670	3,193	4,745
Germany	12,533	7,959	7,270
All other destination markets	38,415	52,322	55,144
All destination markets	110,572	142,872	155,844

Table continued on next page.

Table VII-44—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Turkey by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
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	717	482	424
Netherlands	546	742	669
Germany	959	1,136	1,035
All other destination markets	769	854	693
All destination markets	717	794	676
	Share of quantity (percent)		
United States	23.0	22.9	26.4
Belgium	10.6	10.3	9.0
Egypt	7.4	7.5	6.5
Mexico	8.0	6.9	5.5
Denmark	2.6	5.2	4.7
Italy	5.5	4.8	4.1
Brazil	0.1	2.2	3.1
Netherlands	2.0	2.4	3.1
Germany	8.5	3.9	3.0
All other destination markets	32.4	34.1	34.5
All destination markets	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 the Government of Turkey's State Institute of Statistics in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

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.⁶⁸ The Commission received a usable questionnaire response from one firm: PJSC PA Stalkanat-Silur ("Stalkanat"). This firm's 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), the 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

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)
Stalkanat	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

⁶⁸ These firms were identified through a review of information submitted in the petition and contained in *** records.

Changes in operations

Stalkanat ***.⁶⁹ It also indicated that ***.

Operations on PC strand

Table VII-46 presents information on the PC strand operations of Stalkanat. During 2017-19, Stalkanat's production capacity increased by *** percent and it is projected to further increase by *** percent from 2019 to 2020 and ***. Its PC strand production fluctuated and increased by *** percent from 2017 to 2019 and capacity utilization also fluctuated but decreased by *** percentage points. Stalkanat's capacity utilization ***.⁷⁰ Stalkanat's capacity, production, and capacity utilization were all higher in interim 2020 than in interim 2019. Its end-of-period inventories *** during 2017-19.⁷¹

⁶⁹ Stalkanat indicated that ***. Stalkanat's foreign producer questionnaire response, section II-10.

⁷⁰ Projections indicate that Stalkanat's production is expected to increase by *** percent from 2019 to 2020 and by *** from 2020 to 2021. Moreover, its capacity utilization is expected to increase by *** percentage points from 2019 to 2020 and by *** percentage points from 2020 to 2021.

⁷¹ Stalkanat indicated that ***. Email from ***, November 10, 2020.

Table VII-46

PC strand: Data for Stalkanat, 2017-19, January to September 2019, January to September 2020, and projections for calendar year 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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.

Stalkanat's commercial home market shipments increased by *** percent during 2017-19 and are projected to further increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021. Total shipments fluctuated and increased by *** percent from 2017 to 2019. Exports of PC strand to the United States also fluctuated and increased by *** percent from *** and are projected to decrease *** and then increase ***. Exports to all other markets fluctuated and increased by *** during 2017-19 and are projected to further increase by *** percent from 2019 to 2020 and by *** percent from 2020 to 2021. Stalkanat's commercial home market shipments and exports to all other markets were higher in interim 2020 than in interim 2019, while its exports to the United States were lower. As a share of total shipments, exports to the United States fluctuated and increased by *** percentage points during 2017-19. Exports to all other markets as a share of total shipments fluctuated but decreased by *** percentage points from 2017 to 2019, while total exports as a share of total shipments fluctuated and increased by *** percentage points. Other export markets identified by Stalkanat included ***.⁷²

Alternative products

Stalkanat indicated ***.

Exports

According to GTA, the leading export markets by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from Ukraine are the United States and Belarus (table VII-47). During 2019, the United States was the top export market for those exports from Ukraine, accounting for 22.5 percent of exports by quantity, followed by Belarus, accounting for 19.5 percent.

⁷² Stalkanat's foreign producer questionnaire response, section II-8. Stalkanat ***. Email from ***, November 10, 2020.

Table VII-47

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Ukraine by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
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	3,774	3,233	2,692
All destination markets	9,544	17,836	14,046
	Value (1,000 dollars)		
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	2,632	2,535	3,267
All destination markets	5,627	9,960	9,075

Table continued on next page.

Table VII-47—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from Ukraine by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	382	466	392
Belarus	523	618	781
Lithuania	401	444	391
Hungary	399	446	345
Georgia	518	620	492
Latvia	492	424	373
Suriname	---	398	389
Bulgaria	641	647	641
Czech Republic	672	822	785
All other destination markets	697	784	1,214
All destination markets	590	558	646
	Share of quantity (percent)		
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	39.5	18.1	19.2
All destination markets	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 October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

The industry in the United Arab Emirates

The Commission issued foreign producers' or exporters' questionnaires to two firms believed to produce and/or export PC strand from the United Arab Emirates ("UAE").⁷³ 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 reported in its questionnaire response accounts for *** percent of production of PC strand in UAE during 2019. Table VII-48 presents information on the PC strand operations of Essen.

Table VII-48
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	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Changes in operations

As presented in table VII-49, Essen reported operational and organizational changes since January 1, 2017.

Table VII-49
PC strand: Essen's reported changes in operations, since January 1, 2017

Item / Firm	Reported changed in operations
Plant openings:	
***	***

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

⁷³ These firms were identified through a review of information submitted in the petition and contained in *** records.

Operations on PC strand

Table VII-50 presents information on the PC strand operations of Essen. ***.^{74 75} Essen's production capacity ***. Similarly, its production of PC strand *** and its capacity utilization is projected to increase by *** percentage points between 2019 and 2021.^{76 77}

Essen's commercial home shipments of PC strand are projected to increase ***. Those home shipments ***. ***. Essen's exports of PC strand to all other markets increased *** during 2017-19 and are projected to increase ***.⁷⁸ Other export markets identified by Essen included ***.⁷⁹

⁷⁴ Essen's foreign producer questionnaire response, section II-8. Essen indicated that ***. Ibid., section II-10.

⁷⁵ According to its website, Essen was established in 2016 and is based in the Khalifa Industrial Zone (Kizad) of Abu Dhabi. Essen Steel, "About," retrieved November 13, 2020. <http://essensteel.com/#about>.

⁷⁶ Essen based its projections on ***. Essen's foreign producer questionnaire response, section II-8.

⁷⁷ Essen's capacity, production, and end-of-period inventories were all higher during interim 2020 than during interim 2019.

⁷⁸ Essen's commercial home market shipments, exports to all other markets, and total shipments were all higher in interim 2020 than in interim 2019.

⁷⁹ Essen's foreign producer questionnaire response, section II-8. Essen further reported ***. Email from *** , November 4, 2020.

Table VII-50

PC strand: Data for Essen, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
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	***	***	***	***	***	***	***
	Ratios and shares (percent)						
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 by quantity for stranded wire, ropes, and cables, of iron or steel, not electrically insulated, which includes PC strand, from UAE are the United States and the United Kingdom (table VII-51). During 2019, the United States was the top export market for those exports from UAE, accounting for 51.0 percent of exports by quantity, followed by the United Kingdom, accounting for 19.5 percent.

Table VII-51
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from UAE by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	7,492	4,827	7,077
United Kingdom	2,782	3,032	2,707
Netherlands	1,668	1,010	1,120
India	243	285	1,023
China	16	12	445
Pakistan	364	624	290
Germany	443	875	194
Brazil	168	68	139
Jordan	3	2	113
All other destination markets	21,818	13,992	758
All destination markets	34,997	24,727	13,865
	Value (1,000 dollars)		
United States	5,781	4,272	2,559
United Kingdom	1,576	2,144	2,122
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
Jordan	3	8	106
All other destination markets	15,539	14,827	3,419
All destination markets	25,774	24,496	11,976

Table continued on next page.

Table VII-51—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Exports from UAE by destination market, 2017-19

Destination market	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	772	885	362
United Kingdom	567	707	784
Netherlands	630	722	733
India	880	2,083	1,389
China	180	2,756	1,681
Pakistan	2,533	1,585	1,458
Germany	1,298	979	1,359
Brazil	655	629	687
Jordan	1,061	3,318	937
All other destination markets	712	1,060	4,512
All destination markets	736	991	864
	Share of quantity (percent)		
United States	21.4	19.5	51.0
United Kingdom	7.9	12.3	19.5
Netherlands	4.8	4.1	8.1
India	0.7	1.2	7.4
China	0.0	0.0	3.2
Pakistan	1.0	2.5	2.1
Germany	1.3	3.5	1.4
Brazil	0.5	0.3	1.0
Jordan	0.0	0.0	0.8
All other destination markets	62.3	56.6	5.5
All destination markets	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 import statistics of imports from United Arab Emirates (constructed export statistics for United Arab Emirates) under HS subheading 7312.10 as reported by UN Comtrade in the Global Trade Atlas database, accessed October 21, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

Subject countries combined

Table VII-52 presents summary data on PC strand operations of the reporting subject producers in the subject countries during 2019.

Table VII-52
PC strand: Data on the industry in subject countries, 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)
Acindar (Argentina)	***	***	***	***	***	***
Al Faisal (Saudi Arabia)	***	***	***	***	***	***
Bumi (Indonesia)	***	***	***	***	***	***
Celik Halat (Turkey)	***	***	***	***	***	***
Chia (Taiwan)	***	***	***	***	***	***
Essen (UAE)	***	***	***	***	***	***
Guney Celik (Turkey)	***	***	***	***	***	***
Has Celik (Turkey)	***	***	***	***	***	***
Kingdom (Indonesia)	***	***	***	***	***	***
Kiswire (Malaysia)	***	***	***	***	***	***
Maklada (Tunisia)	***	***	***	***	***	***
National Metal (Saudi Arabia)	***	***	***	***	***	***
Nedri (the Netherlands)	***	***	***	***	***	***
Stalkanat (Ukraine)	***	***	***	***	***	***
Scaw (South Africa)	***	***	***	***	***	***
Sumiden (Indonesia)	***	***	***	***	***	***
Trafilati (Italy)	***	***	***	***	***	***
Trafilerie (Italy)	***	***	***	***	***	***
TYCSA (Spain)	***	***	***	***	***	***
United Wires (Egypt)	***	***	***	***	***	***
WBO Italcables (Italy)	***	***	***	***	***	***
Wei Dat	***	***	***	***	***	***
All firms	1,250,452	100.0	233,477	100.0	1,253,087	18.6

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

Table VII-53 presents summary data on PC strand operations of the reporting subject producers in the subject countries during 2017-19, interim 2019, interim 2020, and projections for calendar years 2020 and 2021. Subject country producers had a combined total annual capacity of 2.0 billion pounds in 2019. The combined subject country producers' capacity increased by 19.9 percent from 2017 to 2019 and was 1.6 percent higher during interim 2020 than in interim 2019. Their combined PC strand production fluctuated and increased by 2.1 percent during 2017-19, while their capacity utilization decreased by 10.7 percentage points during the same period. Subject country producers' combined PC strand production and capacity utilization were 4.4 percent and 3.6 percentage points lower, respectively, during interim 2020 than during interim 2019. End-of-period inventories increased by 92.0 percent from 2017-19 and are projected to decrease during 2020 and 2021.⁸⁰

Commercial home market shipments fluctuated but decreased by 9.1 percent from 2017 to 2019 and were 2.0 percent higher during interim 2020 than during interim 2019. Total shipments for the combined subject producers decreased irregularly by 0.2 percent during 2017-19 and were 1.0 percent lower during interim 2020 than in interim 2019. Exports of PC strand to the United States increased by 23.6 percent from 2017 to 2019, while exports to all other markets decreased irregularly by 6.1 percent.⁸¹ Exports to the United States were 27.4 percent lower during interim 2020 than in interim 2019, while exports to all other markets were 9.8 percent higher. As a share of total shipments, exports to the United States increased by 3.6 percentage points during 2017-19, while exports to all other markets decreased by 2.5 percentage points. Total exports as a share of total shipments increased irregularly by 1.1 percentage points during 2017-19, ending at 58.3 percent of total shipments in 2019.

⁸⁰ Projections indicate that the combined subject producers' capacity is expected to increase from 2019 levels to 2021 projections by 4.7 percent, while their combined production is expected to increase irregularly by 25.2 percent. Subject producers' combined exports of PC strand to the United States are projected to decrease from 2019 levels to 2021 projections by 27.9 percent. Combined subject producers' capacity utilization is projected to fluctuate but increase during 2020 and 2021 compared with 2019 levels.

⁸¹ Projections indicate that the combined subject producers' commercial home market shipments are expected to decrease by 1.1 percent from 2019 to 2020 and then increase by 47.5 percent from 2020 to 2021. Their combined exports of PC strand to the United States are projected to decrease by 25.9 percent from 2019 to 2020 and then decrease further by 2.7 percent from 2020 to 2021, while their exports to other markets are projected to increase by 12.9 percent from 2019 to 2020 and further increase by 16.6 percent from 2020 to 2021.

Table VII-53

PC strand: Data on industry in subject sources, 2017-19, January to September 2019, January to September 2020, and projections for calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to September		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	Quantity (1,000 pounds)						
Capacity	1,697,811	1,830,309	2,035,413	1,544,138	1,568,435	2,094,959	2,131,357
Production	1,224,425	1,381,246	1,250,452	939,185	897,726	1,247,465	1,565,643
End-of-period inventories	59,947	116,985	115,072	139,009	103,856	113,752	113,272
Shipments:							
Home market shipments:							
Internal consumption/transfers	6,444	5,583	39,549	29,677	27,301	35,110	36,786
Commercial home market shipments	530,869	544,988	482,466	336,928	343,552	477,242	704,058
Total home market shipments	537,313	550,571	522,015	366,605	370,853	512,352	740,844
Export shipments to:							
United States	189,008	220,487	233,477	181,201	131,501	172,939	168,336
All other markets	529,812	552,877	497,595	369,261	405,417	561,897	655,224
Total exports	718,820	773,364	731,072	550,462	536,918	734,836	823,560
Total shipments	1,256,133	1,323,935	1,253,087	917,067	907,771	1,247,188	1,564,404
	Ratios and shares (percent)						
Capacity utilization	72.1	75.5	61.4	60.8	57.2	59.5	73.5
Inventories/production	4.9	8.5	9.2	11.1	8.7	9.1	7.2
Inventories/total shipments	4.8	8.8	9.2	11.4	8.6	9.1	7.2
Share of shipments:							
Home market shipments:							
Internal consumption/transfers	0.5	0.4	3.2	3.2	3.0	2.8	2.4
Commercial home market shipments	42.3	41.2	38.5	36.7	37.8	38.3	45.0
Total home market shipments	42.8	41.6	41.7	40.0	40.9	41.1	47.4
Export shipments to:							
United States	15.0	16.7	18.6	19.8	14.5	13.9	10.8
All other markets	42.2	41.8	39.7	40.3	44.7	45.1	41.9
Total exports	57.2	58.4	58.3	60.0	59.1	58.9	52.6
Total shipments	100.0	100.0	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, interim 2019, and interim 2020. Inventories from subject sources and all import sources increased during 2017-19, while inventories from nonsubject sources increased irregularly. Inventories from subject sources increased by 42.8 percent from 2017 to 2019. During the same period, inventories from nonsubject sources fluctuated and increased by 57.9 percent. Inventories from all import sources increased by 47.8 percent from 2017 to 2019. Inventories from subject sources were 26.2 percent lower during interim 2020 than in interim 2019, while inventories from nonsubject sources and inventories from all import sources were 106.9 percent and 11.6 percent higher, respectively.

Table VII-54

PC strand: U.S. importers' inventories, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	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' end-of-period inventories of imports by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Inventories (1,000 pounds); Ratios (percent)				
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' end-of-period inventories of imports by source, 2017-19, January to September 2019, and January to September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	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 subject sources Inventories	14,048	15,778	20,067	21,367	15,769
Ratio to U.S. imports	6.3	6.5	8.2	8.3	8.3
Ratio to U.S. shipments of imports	6.5	6.7	8.4	8.6	8.0
Ratio to total shipments of imports	6.5	6.7	8.4	8.6	8.0
Imports from nonsubject sources: Inventories	6,836	6,610	10,796	8,471	17,523
Ratio to U.S. imports	14.5	13.8	29.0	22.2	18.3
Ratio to U.S. shipments of imports	14.7	13.7	32.6	23.7	20.2
Ratio to total shipments of imports	14.7	13.7	32.6	23.7	20.2
Imports from all import sources: Inventories	20,884	22,388	30,863	29,838	33,292
Ratio to U.S. imports	7.7	7.7	10.9	10.1	11.6
Ratio to U.S. shipments of imports	7.9	7.8	11.4	10.5	11.8
Ratio to total shipments of imports	7.9	7.8	11.4	10.5	11.8

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 and nonsubject sources on or after October 1, 2020 through September 30, 2021. These data are presented in table VII-55. Subject sources accounted for *** percent of arranged imports of PC strand during that period.

Table VII-55
PC strand: Arranged imports, October 2020 through September 2021

Item	Period				
	Oct-Dec 2020	Jan-Mar 2021	Apr-Jun 2021	Jul-Sep 2021	Total
	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

PC strand produced in Spain is subject to antidumping duties in Mexico. On February 27, 2016, Mexico imposed antidumping orders of \$0.13 per kilogram on imports of PC strand from Spain.⁸²

Global Markets

Table VII-56 presents global export data for HS 7312.10 (stranded wire, ropes, and cables, of iron or steel, not electrically insulated), a subheading that includes both subject PC strand and out-of-scope products. The quantity of global exports decreased by 1.2 percent during 2017-19, while the value of those exports increased by 4.7 percent over the same period. In 2019, China was the largest global exporter of these products, based on both quantity and value, accounting for 38.4 percent of global exports by quantity and 29.2 percent

⁸² WTO, "Mexico - Semi-Annual Report under Article 16.4 of the Agreement," September 18, 2020.

of global exports by value. The largest global exporters (in descending order by quantity in 2019) were China, Korea, and Thailand.

Table VII-56
Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Quantity (1,000 pounds)		
United States	137,885	141,198	105,538
Argentina	19,904	4,215	3,291
Colombia	7,235	5,365	3,575
Egypt	846	---	---
Indonesia	109,972	140,284	151,475
Italy	287,571	267,175	221,953
Malaysia	248,637	224,304	271,008
Netherlands	75,495	89,554	85,177
Saudi Arabia	20,113	30,736	5,617
South Africa	52,732	53,299	47,737
Spain	100,288	110,989	116,259
Taiwan	15,794	11,992	13,374
Tunisia	59,266	52,636	43,842
Turkey	154,122	179,844	230,676
Ukraine	9,544	17,836	14,046
UAE	34,997	24,727	13,865
Subject sources	1,196,515	1,212,956	1,221,894
China	2,464,043	2,509,236	2,700,281
Korea	560,300	533,339	494,461
Thailand	311,401	385,744	349,502
Germany	226,734	233,954	224,627
Belarus	200,318	190,179	182,504
Portugal	231,625	196,042	181,881
Romania	155,209	171,302	179,517
India	134,844	168,477	164,780
All other exporters	5,791,307	6,021,316	5,713,528
All reporting exporters	7,125,708	7,375,470	7,040,959

Table continued on next page.

Table VII-56—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Value (1,000 dollars)		
United States	251,510	284,635	263,578
Argentina	19,493	3,926	2,223
Colombia	4,919	4,276	3,278
Egypt	321	---	---
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	104,883
Saudi Arabia	10,815	13,600	2,394
South Africa	31,971	43,306	34,291
Spain	93,160	109,707	108,751
Taiwan	15,890	14,299	16,402
Tunisia	21,731	24,089	18,091
Turkey	110,572	142,872	155,844
Ukraine	5,627	9,960	9,075
UAE	25,774	24,496	11,976
Subject sources	884,015	1,002,668	930,612
China	1,486,432	1,745,689	1,802,398
Korea	509,785	529,049	490,401
Thailand	178,200	238,949	222,588
Germany	387,177	443,469	432,742
Belarus	131,078	135,314	126,863
Portugal	114,142	119,679	103,092
Romania	160,876	186,914	193,097
India	70,668	104,504	104,959
All other exporters	4,664,204	5,483,840	4,872,224
All reporting exporters	5,799,728	6,771,144	6,066,414

Table continued on next page.

Table VII-56—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Unit value (dollars per 1,000 pounds)		
United States	1,824	2,016	2,497
Argentina	979	932	675
Colombia	680	797	917
Egypt	379	---	---
Indonesia	827	771	723
Italy	790	941	884
Malaysia	521	591	581
Netherlands	1,275	1,340	1,231
Saudi Arabia	538	442	426
South Africa	606	813	718
Spain	929	988	935
Taiwan	1,006	1,192	1,226
Tunisia	367	458	413
Turkey	717	794	676
Ukraine	590	558	646
UAE	736	991	864
Subject sources	739	827	762
China	603	696	667
Korea	910	992	992
Thailand	572	619	637
Germany	1,708	1,896	1,926
Belarus	654	712	695
Portugal	493	610	567
Romania	1,037	1,091	1,076
India	524	620	637
All other exporters	805	911	853
All reporting exporters	814	918	862

Table continued on next page.

Table VII-56—Continued

Stranded wire, ropes, and cables, of iron or steel, not electrically insulated: Global exports by exporter, 2017-19

Exporter	Calendar year		
	2017	2018	2019
	Share of quantity (percent)		
United States	2.4	1.9	1.5
Argentina	0.3	0.1	0.0
Colombia	0.1	0.1	0.1
Egypt	0.0	---	---
Indonesia	1.5	1.9	2.2
Italy	4.0	3.6	3.2
Malaysia	3.5	3.0	3.8
Netherlands	1.1	1.2	1.2
Saudi Arabia	0.3	0.4	0.1
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	0.7	0.6
Turkey	2.2	2.4	3.3
Ukraine	0.1	0.2	0.2
UAE	0.5	0.3	0.2
Subject sources	16.8	16.4	17.4
China	34.6	34.0	38.4
Korea	7.9	7.2	7.0
Thailand	4.4	5.2	5.0
Germany	3.2	3.2	3.2
Belarus	2.8	2.6	2.6
Portugal	3.3	2.7	2.6
Romania	2.2	2.3	2.5
India	1.9	2.3	2.3
All other exporters	81.3	81.6	81.1
All reporting 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.

Source: Official exports statistics under HS subheading 7312.10 reported by various national statistical authorities in the Global Trade Atlas database, accessed October 22, 2020. Data reported under HS subheading 7312.10 include both subject PC strand and merchandise outside the scope of these investigations.

APPENDIX A

***FEDERAL REGISTER* NOTICES**

The Commission makes available notices relevant to its investigations and reviews on its website, www.usitc.gov. In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
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>	https://www.govinfo.gov/content/pkg/FR-2020-04-23/pdf/2020-08576.pdf
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>	https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10233.pdf
85 FR 28610, May 13, 2020	<i>Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Initiation of Countervailing Duty Investigation</i>	https://www.govinfo.gov/content/pkg/FR-2020-05-13/pdf/2020-10234.pdf

<p>85 FR 34648, June 5, 2020</p>	<p><i>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</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-06-05/pdf/2020-12153.pdf</p>
<p>85 FR 55413, September 8, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Indonesia, Italy, Malaysia, South Africa, Spain, Tunisia, and Ukraine: Postponement of Preliminary Determinations in the Less-Than-Fair-Value Investigations</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-09-08/pdf/2020-19786.pdf</p>
<p>85 FR 59287, September 21, 2020</p>	<p><i>Prestressed Concrete Steel Wire From the Republic of Turkey: Preliminary Affirmative Countervailing Duty Determination, Preliminary Affirmative Critical Circumstances Determination, in Part</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-09-21/pdf/2020-20692.pdf</p>
<p>85 FR 61722, September 30, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, the Republic of Turkey, and the United Arab Emirates: Preliminary Affirmative Determinations of Sales at Less Than Fair Value and Preliminary Affirmative Critical Circumstances Determinations, in Part</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-09-30/pdf/2020-21546.pdf</p>

<p>85 FR 61726, September 30, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Taiwan: Preliminary Affirmative Determination of Sales at Less Than Fair Value and Negative Preliminary Determination of Critical Circumstances</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-09-30/pdf/2020-21547.pdf</p>
<p>85 FR 63576, October 8, 2020</p>	<p><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; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-10-08/pdf/2020-22308.pdf</p>
<p>85 FR 70585, November 5, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand from the Republic of Turkey: Alignment of Final Countervailing Duty Determination With Final Less-Than-Fair-Value Determinations</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-05/pdf/2020-24564.pdf</p>
<p>85 FR 73676, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Indonesia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Affirmative Determination of Critical Circumstances, in Part, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25482.pdf</p>

<p>85 FR 73681, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Tunisia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25487.pdf</p>
<p>85 FR 73685, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Malaysia: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25484.pdf</p>
<p>85 FR 73674, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From South Africa: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25485.pdf</p>
<p>85 FR 73683, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Spain: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25486.pdf</p>

<p>85 FR 73679, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Italy: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25483.pdf</p>
<p>85 FR 73688, November 19, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Ukraine: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Preliminary Negative Determination of Critical Circumstances, Postponement of Final Determination, and Extension of Provisional Measures</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-11-19/pdf/2020-25488.pdf</p>
<p>85 FR 80005, December 11, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From the Republic of Turkey: Final Affirmative Countervailing Duty Determination and Final Negative Critical Circumstances Determination</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-12-11/pdf/2020-27310.pdf</p>
<p>85 FR 80001, December 11, 2020</p>	<p><i>Prestressed Concrete Steel Wire Strand From Argentina, Colombia, Egypt, the Netherlands, Saudi Arabia, Taiwan, the Republic of Turkey, and the United Arab Emirates: Final Affirmative Determinations of Sales at Less Than Fair Value and Final Affirmative Critical Circumstances Determinations, in Part</i></p>	<p>https://www.govinfo.gov/content/pkg/FR-2020-12-11/pdf/2020-27311.pdf</p>

APPENDIX B

LIST OF HEARING WITNESSES

CALENDAR OF PUBLIC HEARING

Those listed below appeared in the United States International Trade Commission's hearing via videoconference:

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 (Final)

Date and Time: December 10, 2020 - 9:30 a.m.

FOREIGN GOVERNMENT WITNESSES:

**Government of Ukraine
Department of Foreign Economic Activity and Trade Defense
Ministry for Development of Economy, Trade and Agriculture of Ukraine
Ukraine, Kyiv**

Elena Yushchuk, Head of the Defense on Foreign Markets Unit

EMBASSY APPEARANCE:

**Embassy of the Republic of Indonesia
Washington, DC**

Mr. Wijayanto, Commercial Attaché

OPENING REMARKS:

Petitioners (**Kathleen W. Cannon, Kelley Drye & Warren LLP**)

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

H.O. Woltz III, President and Chief Executive Officer,
Insteel Wire Products Company

Richard Wagner, Vice President & General Manager,
Insteel Wire Products Company

E. Randy Plitt, National Sales Manager, Insteel Wire Products
Company

Jon Cornelius, Executive Vice President and General Manager,
PC Strand Division, Sumiden Wire Products Corporation

Jeff Feitler, Vice President, Sales & Marketing, Sumiden Wire
Products Corporation

Jordi Barrenechea, President, Wire Mesh Corporation

Gina E. Beck, Economist, Georgetown Economic Services LLC

Brad Hudgens, Economist, Georgetown Economic Services LLC

Kathleen W. Cannon)
Paul C. Rosenthal)
R. Alan Luberd) – OF COUNSEL
Brooke M. Ringel)
Elizabeth C. Johnson)

CLOSING REMARKS:

Petitioners (**Kathleen W. Cannon**, Kelley Drye & Warren LLP)

-END-

APPENDIX C
SUMMARY DATA

Table C-1

PC strand: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(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		2019	January to September		Comparison years			Jan-Sep
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***
Importers' share (fn1):									
Argentina.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Colombia.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	***	▲***	▲***
Indonesia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Malaysia.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Netherlands.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Saudi Arabia.....	***	***	***	***	***	▼***	▲***	▼***	▲***
South Africa.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Spain.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Taiwan.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Tunisia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Turkey.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ukraine.....	***	***	***	***	***	▲***	▲***	▼***	▼***
UAE.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
Argentina.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Colombia.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Egypt.....	***	***	***	***	***	▲***	***	▲***	▲***
Indonesia.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Italy.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Malaysia.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Netherlands.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Saudi Arabia.....	***	***	***	***	***	▼***	▲***	▼***	▲***
South Africa.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Spain.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Taiwan.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Tunisia.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Turkey.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Ukraine.....	***	***	***	***	***	▲***	▲***	▼***	▼***
UAE.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Subject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. imports from:									
Argentina:									
Quantity.....	---	2,196	6,125	6,125	230	▲***	▲***	▲178.9	▼(96.2)
Value.....	---	1,083	2,599	2,599	89	▲***	▲***	▲139.9	▼(96.6)
Unit value.....	---	\$493	\$424	\$424	\$388	▲***	▲***	▼(14.0)	▼(8.6)
Ending inventory quantity.....	***	***	***	***	***	***	▲***	▼***	▼***
Colombia:									
Quantity.....	26,649	24,241	23,840	18,644	8,875	▼(10.5)	▼(9.0)	▼(1.7)	▼(52.4)
Value.....	9,156	10,594	9,846	7,868	3,127	▲7.5	▲15.7	▼(7.1)	▼(60.3)
Unit value.....	\$344	\$437	\$413	\$422	\$352	▲20.2	▲27.2	▼(5.5)	▼(16.5)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Egypt:									
Quantity.....	---	---	968	409	2,807	▲***	---	▲***	▲586.1
Value.....	---	---	372	173	889	▲***	---	▲***	▲413.8
Unit value.....	---	---	\$384	\$423	\$317	▲***	---	▲***	▼(25.1)
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	▼***
Indonesia:									
Quantity.....	634	10,350	13,890	11,655	4,474	▲2,091.1	▲1,532.6	▲34.2	▼(61.6)
Value.....	213	4,416	5,380	4,578	1,344	▲2,423.5	▲1,971.5	▲21.8	▼(70.6)
Unit value.....	\$336	\$427	\$387	\$393	\$300	▲15.2	▲26.9	▼(9.2)	▼(23.5)
Ending inventory quantity.....	***	***	***	***	***	***	▲***	▼***	▼***

Table continued on next page.

Table C-1--Continued

PC strand: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(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		January to September			Comparison years			Jan-Sep
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. imports from:--Continued									
Italy:									
Quantity.....	21,227	14,819	24,305	21,209	26,576	▲14.5	▼(30.2)	▲64.0	▲25.3
Value.....	7,379	7,382	10,984	9,707	9,974	▲48.9	▲0.0	▲48.8	▲2.8
Unit value.....	\$348	\$498	\$452	\$458	\$375	▲30.0	▲43.3	▼(9.3)	▼(18.0)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Malaysia:									
Quantity.....	70,651	68,456	67,779	52,724	31,598	▼(4.1)	▼(3.1)	▼(1.0)	▼(40.1)
Value.....	23,838	30,263	27,129	21,630	10,576	▲13.8	▲27.0	▼(10.4)	▼(51.1)
Unit value.....	\$337	\$442	\$400	\$410	\$335	▲18.6	▲31.0	▼(9.5)	▼(18.4)
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Netherlands:									
Quantity.....	3,133	1,978	2,888	2,227	1,532	▼(7.8)	▼(36.9)	▲46.0	▼(31.2)
Value.....	1,907	1,300	1,800	1,413	872	▼(5.6)	▼(31.8)	▲38.5	▼(38.2)
Unit value.....	\$609	\$657	\$623	\$634	\$570	▲2.4	▲7.9	▼(5.2)	▼(10.2)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Saudi Arabia:									
Quantity.....	7,732	18,591	3,647	2,792	9,836	▼(52.8)	▲140.4	▼(80.4)	▲252.4
Value.....	2,575	7,698	1,422	1,117	3,084	▼(44.8)	▲198.9	▼(81.5)	▲176.2
Unit value.....	\$333	\$414	\$390	\$400	\$314	▲17.1	▲24.3	▼(5.8)	▼(21.6)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	***	***
South Africa:									
Quantity.....	20,422	20,367	17,905	11,841	15,848	▼(12.3)	▼(0.3)	▼(12.1)	▲33.8
Value.....	7,023	9,063	7,490	5,170	5,681	▲6.6	▲29.1	▼(17.4)	▲9.9
Unit value.....	\$344	\$445	\$418	\$437	\$358	▲21.6	▲29.4	▼(6.0)	▼(17.9)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Spain:									
Quantity.....	26,609	15,852	41,812	33,517	36,406	▲57.1	▼(40.4)	▲163.8	▲8.6
Value.....	9,437	7,703	16,501	13,507	12,539	▲74.8	▼(18.4)	▲114.2	▼(7.2)
Unit value.....	\$355	\$486	\$395	\$403	\$344	▲11.3	▲37.0	▼(18.8)	▼(14.5)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Taiwan:									
Quantity.....	2,589	10,676	6,288	5,400	6,416	▲142.9	▲312.3	▼(41.1)	▲18.8
Value.....	1,014	5,092	3,056	2,683	2,427	▲201.3	▲402.1	▼(40.0)	▼(9.6)
Unit value.....	\$392	\$477	\$486	\$497	\$378	▲24.0	▲21.8	▲1.9	▼(23.9)
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Tunisia:									
Quantity.....	22,991	25,373	25,173	24,091	7,007	▲9.5	▲10.4	▼(0.8)	▼(70.9)
Value.....	7,683	10,967	9,900	9,546	2,252	▲28.8	▲42.7	▼(9.7)	▼(76.4)
Unit value.....	\$334	\$432	\$393	\$396	\$321	▲17.7	▲29.3	▼(9.0)	▼(18.9)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
Turkey:									
Quantity.....	30,378	27,889	35,971	24,943	25,335	▲18.4	▼(8.2)	▲29.0	▲1.6
Value.....	10,580	12,603	14,311	10,040	9,429	▲35.3	▲19.1	▲13.6	▼(6.1)
Unit value.....	\$348	\$452	\$398	\$403	\$372	▲14.2	▲29.8	▼(12.0)	▼(7.5)
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Ukraine:									
Quantity.....	529	4,385	2,796	1,848	1,707	▲428.8	▲729.4	▼(36.2)	▼(7.6)
Value.....	187	1,836	987	672	524	▲429.0	▲884.4	▼(46.3)	▼(22.1)
Unit value.....	\$353	\$419	\$353	\$364	\$307	▲0.0	▲18.7	▼(15.7)	▼(15.6)
Ending inventory quantity.....	***	***	***	***	***	***	***	***	***
UAE:									
Quantity.....	4,542	612	6,884	6,884	---	▲51.6	▼(86.5)	▲1,024.2	▼(100.0)
Value.....	1,891	250	2,359	2,359	---	▲24.8	▼(86.8)	▲843.5	▼(100.0)
Unit value.....	\$416	\$408	\$343	\$343	---	▼(17.7)	▼(1.9)	▼(16.1)	▼(100.0)
Ending inventory quantity.....	***	***	***	***	***	▲***	***	▲***	▼***
Subject sources:									
Quantity.....	238,086	245,786	280,272	224,310	178,648	▲17.7	▲3.2	▲14.0	▼(20.4)
Value.....	82,884	110,251	114,134	93,061	62,807	▲37.7	▲33.0	▲3.5	▼(32.5)
Unit value.....	\$348	\$449	\$407	\$415	\$352	▲17.0	▲28.9	▼(9.2)	▼(15.3)
Ending inventory quantity.....	14,048	15,778	20,067	21,367	15,769	▲42.8	▲12.3	▲27.2	▼(26.2)
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***

Table continued on next page.

Table C-1--Continued

PC strand: Summary data concerning the U.S. market, 2017-19, January to September 2019, and January to September 2020

(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		2019	January to September		Comparison years			Jan-Sep
	2017	2018		2019	2019	2020	2017-19	2017-18	2018-19
U.S. imports from:--Continued									
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
U.S. producers':									
Average capacity quantity.....	1,001,930	1,035,415	1,095,415	746,555	746,555	▲9.3	▲3.3	▲5.8	---
Production quantity.....	682,215	711,687	638,869	440,526	510,059	▼(6.4)	▲4.3	▼(10.2)	▲15.8
Capacity utilization (fn1).....	68.1	68.7	58.3	59.0	68.3	▼(9.8)	▲0.6	▼(10.4)	▲9.3
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Ending inventory quantity.....	71,654	79,428	72,900	63,425	63,485	▲1.7	▲10.8	▼(8.2)	▲0.1
Inventories/total shipments (fn1).....	10.6	11.3	11.3	10.5	9.4	▲0.6	▲0.6	▲0.0	▼(1.1)
Production workers.....	411	398	378	331	373	▼(8.0)	▼(3.2)	▼(5.0)	▲12.7
Hours worked (1,000s).....	953	973	886	619	663	▼(7.0)	▲2.1	▼(8.9)	▲7.1
Wages paid (\$1,000).....	19,203	20,634	19,413	13,464	15,126	▲1.1	▲7.5	▼(5.9)	▲12.3
Hourly wages (dollars per hour).....	\$20.15	\$21.21	\$21.91	\$21.75	\$22.81	▲8.7	▲5.2	▲3.3	▲4.9
Productivity (pounds per hour).....	715.9	731.4	721.1	711.7	769.3	▲0.7	▲2.2	▼(1.4)	▲8.1
Unit labor costs.....	\$28.15	\$28.99	\$30.39	\$30.56	\$29.66	▲8.0	▲3.0	▲4.8	▼(3.0)
Net sales:									
Quantity.....	673,152	705,013	645,796	452,331	506,442	▼(4.1)	▲4.7	▼(8.4)	▲12.0
Value.....	295,030	362,093	321,734	227,946	237,776	▲9.1	▲22.7	▼(11.1)	▲4.3
Unit value.....	\$438	\$514	\$498	\$504	\$470	▲13.7	▲17.2	▼(3.0)	▼(6.8)
Cost of goods sold (COGS).....	259,821	325,278	312,447	222,041	214,959	▲20.3	▲25.2	▼(3.9)	▼(3.2)
Gross profit or (loss) (fn2).....	35,209	36,815	9,287	5,905	22,817	▼(73.6)	▲4.6	▼(74.8)	▲286.4
SG&A expenses.....	19,021	21,125	17,521	11,683	16,168	▼(7.9)	▲11.1	▼(17.1)	▲38.4
Operating income or (loss) (fn2).....	16,188	15,690	(8,234)	(5,778)	6,649	▼***	▼(3.1)	▼***	▲***
Net income or (loss) (fn2).....	14,904	14,374	(9,266)	(6,661)	4,673	▼***	▼(3.6)	▼***	▲***
Capital expenditures.....	36,113	8,423	13,797	11,302	3,724	▼(61.8)	▼(76.7)	▲63.8	▼(67.1)
Research and development expenses....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net assets.....	245,912	251,394	242,568	NA	NA	▼(1.4)	▲2.2	▼(3.5)	NA
Unit COGS.....	\$386	\$461	\$484	\$491	\$424	▲25.3	▲19.5	▲4.9	▼(13.5)
Unit SG&A expenses.....	\$28	\$30	\$27	\$26	\$32	▼(4.0)	▲6.0	▼(9.5)	▲23.6
Unit operating income or (loss) (fn2).....	\$24	\$22	\$(13)	\$(13)	\$13	▼***	▼(7.5)	▼***	▲***
Unit net income or (loss) (fn2).....	\$22	\$20	\$(14)	\$(15)	\$9	▼***	▼(7.9)	▼***	▲***
COGS/sales (fn1).....	88.1	89.8	97.1	97.4	90.4	▲9.0	▲1.8	▲7.3	▼(7.0)
Operating income or (loss)/sales (fn1)....	5.5	4.3	(2.6)	(2.5)	2.8	▼(8.0)	▼(1.2)	▼(6.9)	▲5.3
Net income or (loss)/sales (fn1).....	5.1	4.0	(2.9)	(2.9)	2.0	▼(7.9)	▼(1.1)	▼(6.8)	▲4.9

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

Source: Compiled from data submitted in response to Commission questionnaires and official U.S. import statistics for HTS statistical reporting numbers 7312.10.3010, and 7312.10.3012, accessed November 5, 2020.

APPENDIX D

**U.S. PRODUCERS' AND U.S. IMPORTERS' SHIPMENTS BY APPLICATION TYPE,
2017-19, JANUARY TO SEPTEMBER 2019, AND JANUARY TO SEPTEMBER 2020**

Appendix D presents data on U.S. producers' and U.S. importers' U.S. shipments by application type during 2017-19, January-September 2019, January-September 2020. Table D-1 presents U.S. producers' U.S. shipments by application type, while table D-2 presents U.S. importers' U.S. shipments by application type (each subject country separately and also the subject countries combined). Tables D-3 and D-4 present U.S. importers' U.S. shipments to pre-tension and post-tension PC strand to end users during 2017-19, January-September 2019, and January-September 2020.

Table D-1
PC strand: U.S. producers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments.-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. producers' U.S. shipments.-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. producers' U.S. shipments.-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. producers' U.S. shipments.-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. producers' U.S. shipments.-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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

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

Table D-2
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Argentina).-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Argentina).-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Argentina).-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Argentina).-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Argentina).-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Quantity (1,000 pounds)					
U.S. importers' U.S. shipments (Colombia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Value (1,000 dollars)					
U.S. importers' U.S. shipments (Colombia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Unit value (dollars per 1,000 pounds)					
U.S. importers' U.S. shipments (Colombia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of quantity (percent)					
U.S. importers' U.S. shipments (Colombia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of value (percent)					
U.S. importers' U.S. shipments (Colombia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Egypt)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Egypt)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Egypt)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Egypt)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Egypt)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Indonesia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Indonesia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Indonesia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Indonesia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Indonesia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued

PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Italy)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Italy)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Italy)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Italy)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Italy)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Malaysia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Malaysia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Malaysia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Malaysia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Malaysia).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Quantity (1,000 pounds)					
U.S. importers' U.S. shipments (Netherlands).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Value (1,000 dollars)					
U.S. importers' U.S. shipments (Netherlands).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Unit value (dollars per 1,000 pounds)					
U.S. importers' U.S. shipments (Netherlands).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of quantity (percent)					
U.S. importers' U.S. shipments (Netherlands).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of value (percent)					
U.S. importers' U.S. shipments (Netherlands).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Saudi Arabia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Saudi Arabia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Saudi Arabia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Saudi Arabia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Saudi Arabia)--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued

PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (South Africa).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (South Africa).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (South Africa).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (South Africa).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (South Africa).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Quantity (1,000 pounds)					
U.S. importers' U.S. shipments (Spain)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Value (1,000 dollars)					
U.S. importers' U.S. shipments (Spain)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Unit value (dollars per 1,000 pounds)					
U.S. importers' U.S. shipments (Spain)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of quantity (percent)					
U.S. importers' U.S. shipments (Spain)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of value (percent)					
U.S. importers' U.S. shipments (Spain)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Taiwan).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Taiwan).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Taiwan).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Taiwan).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Taiwan).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Tunisia).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Tunisia).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Tunisia).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Tunisia).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Tunisia).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
Quantity (1,000 pounds)					
U.S. importers' U.S. shipments (Turkey).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Value (1,000 dollars)					
U.S. importers' U.S. shipments (Turkey).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Unit value (dollars per 1,000 pounds)					
U.S. importers' U.S. shipments (Turkey).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of quantity (percent)					
U.S. importers' U.S. shipments (Turkey).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
Share of value (percent)					
U.S. importers' U.S. shipments (Turkey).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (Ukraine).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (Ukraine).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (Ukraine).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (Ukraine).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (Ukraine).--					
Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued

PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (UAE)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (UAE)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (UAE)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (UAE)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (UAE)-- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

Table continued on next page.

Table D-2--Continued
PC strand: U.S. importers' U.S. shipments by application, 2017-19, January-September 2019, and
January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. importers' U.S. shipments (subject).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Value (1,000 dollars)				
U.S. importers' U.S. shipments (subject).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Unit value (dollars per 1,000 pounds)				
U.S. importers' U.S. shipments (subject).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of quantity (percent)				
U.S. importers' U.S. shipments (subject).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***
	Share of value (percent)				
U.S. importers' U.S. shipments (subject).-					
- Pre-tension	***	***	***	***	***
Post-tension	***	***	***	***	***
All applications	***	***	***	***	***

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

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

Table D-3
PC strand: U.S. importers' U.S. shipments to pre-tension end users, 2017-19, January-September
2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

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Table D-3--Continued
PC strand: U.S. importers' U.S. shipments to pre-tension end users, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of quantity (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

Table continued on next page.

Table D-3--Continued
PC strand: U.S. importers' U.S. shipments to pre-tension end users, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio of overall apparent consumption (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

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

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

Table D-4
PC strand: U.S. importers' U.S. shipments to post-tension end users, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Quantity (1,000 pounds)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

Table continued on next page.

Table D-4--Continued
PC strand: U.S. importers' U.S. shipments to post-tension end users, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Share of quantity (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

Table continued on next page.

Table D-4--Continued
PC strand: U.S. importers' U.S. shipments to post-tension end users, 2017-19, January-September 2019, and January-September 2020

Item	Calendar year			January to September	
	2017	2018	2019	2019	2020
	Ratio of overall apparent consumption (percent)				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. importers' U.S. shipments of 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	***	***	***	***	***
Combined producers and importers	***	***	***	***	***

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.

APPENDIX E

**SUBJECT COUNTRY COMPARISONS REGARDING
INTERCHANGEABILITY AND FACTORS OTHER THAN PRICE**

Table E-1
PC strand: Interchangeability between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Argentina vs. Colombia	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Egypt	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Indonesia	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Italy	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Malaysia	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Netherlands	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Saudi Arabia	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. South Africa	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Spain	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Taiwan	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Tunisia	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Turkey	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. Ukraine	4	---	---	---	---	1	---	---	3	---	---	---
Argentina vs. UAE	4	---	---	---	---	1	---	---	3	---	---	---
Colombia vs. Egypt	4	---	---	---	1	---	1	---	3	---	---	---
Colombia vs. Indonesia	4	---	---	---	1	1	---	---	4	1	---	---
Colombia vs. Italy	4	---	---	---	1	---	1	---	5	2	---	---
Colombia vs. Malaysia	4	---	---	---	1	---	1	---	5	2	---	---
Colombia vs. Netherlands	4	---	---	---	---	---	1	---	3	---	---	---
Colombia vs. Saudi Arabia	4	---	---	---	---	---	1	---	4	1	---	---
Colombia vs. South Africa	4	---	---	---	1	---	1	---	4	1	---	---
Colombia vs. Spain	4	---	---	---	---	---	1	---	4	2	---	---
Colombia vs. Taiwan	4	---	---	---	---	---	1	---	3	---	---	---
Colombia vs. Tunisia	4	---	---	---	---	---	1	---	5	2	---	---
Colombia vs. Turkey	4	---	---	---	1	---	1	---	5	2	---	---
Colombia vs. Ukraine	4	---	---	---	---	---	1	---	4	---	---	---
Colombia vs. UAE	4	---	---	---	---	---	1	---	4	1	---	---
Egypt vs. Indonesia	4	---	---	---	1	1	---	---	3	---	---	---
Egypt vs. Italy	4	---	---	---	1	---	1	---	3	---	---	---
Egypt vs. Malaysia	4	---	---	---	1	---	1	---	3	---	---	---
Egypt vs. Netherlands	4	---	---	---	---	---	1	---	3	---	---	---
Egypt vs. Saudi Arabia	4	---	---	---	---	---	1	---	3	---	---	---
Egypt vs. South Africa	4	---	---	---	1	---	1	---	3	---	---	---
Egypt vs. Spain	4	---	---	---	---	1	---	---	3	---	---	---
Egypt vs. Taiwan	4	---	---	---	---	1	---	---	3	---	---	---
Egypt vs. Tunisia	4	---	---	---	---	---	1	---	3	---	---	---
Egypt vs. Turkey	4	---	---	---	1	1	---	---	3	---	---	---
Egypt vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
Egypt vs. UAE	4	---	---	---	---	---	1	---	3	---	---	---

Table continued on next page.

Table E-1—Continued
PC strand: Interchangeability between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Indonesia vs. Italy	4	---	---	---	1	---	1	---	4	2	---	---
Indonesia vs. Malaysia	4	---	---	---	1	---	1	---	5	1	---	---
Indonesia vs. Netherlands	4	---	---	---	---	---	1	---	3	---	---	---
Indonesia vs. Saudi Arabia	4	---	---	---	---	1	---	---	3	1	---	---
Indonesia vs. South Africa	4	---	---	---	1	---	1	---	4	---	---	---
Indonesia vs. Spain	4	---	---	---	---	---	1	---	3	2	---	---
Indonesia vs. Taiwan	4	---	---	---	---	---	1	---	4	---	---	---
Indonesia vs. Tunisia	4	---	---	---	---	---	1	---	4	2	---	---
Indonesia vs. Turkey	4	---	---	---	1	---	1	---	4	2	---	---
Indonesia vs. Ukraine	4	---	---	---	---	---	1	---	4	---	---	---
Indonesia vs. UAE	4	---	---	---	---	---	1	---	3	1	---	---
Italy vs. Malaysia	4	---	---	---	1	---	1	---	4	2	---	---
Italy vs. Netherlands	4	---	---	---	---	1	---	---	3	1	---	---
Italy vs. Saudi Arabia	4	---	---	---	---	---	1	---	3	2	---	---
Italy vs. South Africa	4	---	---	---	1	---	1	---	4	2	---	---
Italy vs. Spain	4	---	---	---	---	1	---	---	4	2	---	---
Italy vs. Taiwan	4	---	---	---	---	1	---	---	3	---	---	---
Italy vs. Tunisia	4	---	---	---	---	---	1	---	5	2	---	---
Italy vs. Turkey	4	---	---	---	1	1	---	---	5	2	---	---
Italy vs. Ukraine	4	---	---	---	---	---	1	---	4	---	---	---
Italy vs. UAE	4	---	---	---	---	---	1	---	3	1	---	---
Malaysia vs. Netherlands	4	---	---	---	---	---	1	---	3	---	---	---
Malaysia vs. Saudi Arabia	4	---	---	---	---	---	1	---	4	1	---	---
Malaysia vs. South Africa	4	---	---	---	1	---	1	---	4	1	---	---
Malaysia vs. Spain	4	---	---	---	---	---	1	---	4	1	---	---
Malaysia vs. Taiwan	4	---	---	---	---	---	1	---	4	---	---	---
Malaysia vs. Tunisia	4	---	---	---	---	---	1	---	5	2	---	---
Malaysia vs. Turkey	4	---	---	---	1	---	1	---	5	2	---	---
Malaysia vs. Ukraine	4	---	---	---	---	---	1	---	4	---	---	---
Malaysia vs. UAE	4	---	---	---	---	---	1	---	4	1	---	---
Netherlands vs. Saudi Arabia	4	---	---	---	---	---	1	---	3	1	---	---
Netherlands vs. South Africa	4	---	---	---	---	---	1	---	3	1	---	---
Netherlands vs. Spain	4	---	---	---	---	1	---	---	3	1	---	---
Netherlands vs. Taiwan	4	---	---	---	---	1	---	---	3	---	---	---
Netherlands vs. Tunisia	4	---	---	---	---	---	1	---	3	---	---	---
Netherlands vs. Turkey	4	---	---	---	---	1	---	---	3	---	---	---
Netherlands vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
Netherlands vs. UAE	4	---	---	---	---	---	1	---	3	---	---	---
Saudi Arabia vs. South Africa	4	---	---	---	---	---	1	---	3	1	---	---
Saudi Arabia vs. Spain	4	---	---	---	1	---	1	---	4	2	---	---
Saudi Arabia vs. Taiwan	4	---	---	---	---	---	1	---	3	---	---	---
Saudi Arabia vs. Tunisia	4	---	---	---	---	---	1	---	4	1	---	---
Saudi Arabia vs. Turkey	4	---	---	---	1	---	1	---	4	1	---	---
Saudi Arabia vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
Saudi Arabia vs. UAE	4	---	---	---	---	---	1	---	4	---	---	---

Table continued on next page.

Table E-1—Continued
PC strand: Interchangeability between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
South Africa vs. Spain	4	---	---	---	---	---	1	---	3	1	---	---
South Africa vs. Taiwan	4	---	---	---	---	---	1	---	3	---	---	---
South Africa vs. Tunisia	4	---	---	---	---	1	---	---	3	1	---	---
South Africa vs. Turkey	4	---	---	---	1	---	1	---	3	1	---	---
South Africa vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
South Africa vs. UAE	4	---	---	---	---	---	1	---	3	1	---	---
Spain vs. Taiwan	4	---	---	---	---	1	---	---	3	---	---	---
Spain vs. Tunisia	4	---	---	---	---	---	1	---	5	2	---	---
Spain vs. Turkey	4	---	---	---	1	1	---	---	5	2	---	---
Spain vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
Spain vs. UAE	4	---	---	---	1	---	1	---	4	1	---	---
Taiwan vs. Tunisia	4	---	---	---	---	---	1	1	3	---	---	---
Taiwan vs. Turkey	4	---	---	---	---	1	---	---	3	---	---	---
Taiwan vs. Ukraine	4	---	---	---	---	---	1	---	3	---	---	---
Taiwan vs. UAE	4	---	---	---	---	---	1	---	3	---	---	---
Tunisia vs. Turkey	4	---	---	---	1	---	1	---	6	2	---	---
Tunisia vs. Ukraine	4	---	---	---	---	---	1	---	4	---	---	---
Tunisia vs. UAE	4	---	---	---	---	---	1	---	4	1	---	---
Turkey vs. Ukraine	4	---	---	---	1	---	1	---	4	---	---	---
Turkey vs. UAE	4	---	---	---	---	---	1	---	4	1	---	---
Ukraine vs. UAE	4	---	---	---	---	---	1	---	3	---	---	---
Argentina vs. Other	4	---	---	---	1	1	---	---	3	---	---	---
Colombia vs. Other	4	---	---	1	1	---	1	---	3	1	---	---
Egypt vs. Other	4	---	---	---	1	---	1	---	3	---	---	---
Indonesia vs. Other	4	---	---	---	1	---	1	---	3	1	---	---
Italy vs. Other	4	---	---	---	1	1	---	---	3	1	---	---
Malaysia vs. Other	4	---	---	---	1	---	1	---	3	1	---	---
Netherlands vs. Other	4	---	---	---	1	1	---	---	3	---	---	---
Saudi Arabia vs. Other	4	---	---	---	1	---	1	---	3	---	---	---
South Africa vs. Other	4	---	---	---	1	---	1	---	3	1	---	---
Spain vs. Other	4	---	---	---	1	1	---	---	3	1	---	---
Taiwan vs. Other	4	---	---	---	1	1	---	---	3	---	---	---
Tunisia vs. Other	4	---	---	---	1	---	1	---	3	1	---	---
Turkey vs. Other	4	---	---	---	1	1	---	---	3	1	---	---
Ukraine vs. Other	4	---	---	---	1	---	1	---	3	---	---	---
UAE vs. Other	4	---	---	---	1	---	1	---	3	1	---	---

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

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

Table E-2

PC strand: Significance of differences other than price between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Argentina vs. Colombia	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. Egypt	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Indonesia	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. Italy	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Malaysia	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. Netherlands	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. South Africa	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. Spain	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Tunisia	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. Turkey	---	---	---	4	---	1	---	---	---	---	---	2
Argentina vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Argentina vs. UAE	---	---	---	4	---	---	1	---	---	---	---	2
Colombia vs. Egypt	---	---	---	4	---	---	2	---	---	---	---	2
Colombia vs. Indonesia	---	---	---	4	---	---	2	---	---	---	1	3
Colombia vs. Italy	---	---	---	4	---	---	2	---	---	1	1	3
Colombia vs. Malaysia	---	---	---	4	---	---	2	---	---	1	2	3
Colombia vs. Netherlands	---	---	---	4	---	---	1	---	---	---	---	2
Colombia vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	2	2
Colombia vs. South Africa	---	---	---	4	---	---	2	---	---	1	---	3
Colombia vs. Spain	---	---	---	4	---	---	1	---	---	1	2	2
Colombia vs. Taiwan	---	---	---	4	---	---	1	---	---	---	---	2
Colombia vs. Tunisia	---	---	---	4	---	---	1	---	---	1	2	3
Colombia vs. Turkey	---	---	---	4	---	---	2	---	---	1	2	3
Colombia vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
Colombia vs. UAE	---	---	---	4	---	---	1	---	---	1	2	2
Egypt vs. Indonesia	---	---	---	4	---	---	2	---	---	---	---	2
Egypt vs. Italy	---	---	---	4	---	1	1	---	---	---	---	2
Egypt vs. Malaysia	---	---	---	4	---	---	2	---	---	---	---	2
Egypt vs. Netherlands	---	---	---	4	---	1	---	---	---	---	---	2
Egypt vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	---	2
Egypt vs. South Africa	---	---	---	4	---	---	2	---	---	---	---	2
Egypt vs. Spain	---	---	---	4	---	1	---	---	---	---	---	2
Egypt vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
Egypt vs. Tunisia	---	---	---	4	---	---	1	---	---	---	---	2
Egypt vs. Turkey	---	---	---	4	---	1	1	---	---	---	---	2
Egypt vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Egypt vs. UAE	---	---	---	4	---	---	1	---	---	---	---	2

Table continued on next page.

Table E-2—Continued

PC strand: Significance of differences other than price between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
Indonesia vs. Italy	---	---	---	4	---	---	2	---	---	1	1	3
Indonesia vs. Malaysia	---	---	---	4	---	---	2	---	---	1	1	4
Indonesia vs. Netherlands	---	---	---	4	---	---	1	---	---	---	---	2
Indonesia vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	1	2
Indonesia vs. South Africa	---	---	---	4	---	---	2	---	---	1	---	3
Indonesia vs. Spain	---	---	---	4	---	---	1	---	---	1	1	2
Indonesia vs. Taiwan	---	---	---	4	---	---	1	---	---	---	---	2
Indonesia vs. Tunisia	---	---	---	4	---	---	1	---	---	1	1	4
Indonesia vs. Turkey	---	---	---	4	---	---	2	---	---	1	1	3
Indonesia vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
Indonesia vs. UAE	---	---	---	4	---	---	1	---	---	1	1	2
Italy vs. Malaysia	---	---	---	4	---	---	2	---	---	1	1	3
Italy vs. Netherlands	---	---	---	4	---	1	---	---	---	---	1	2
Italy vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	2	2
Italy vs. South Africa	---	---	---	4	---	---	2	---	---	1	1	3
Italy vs. Spain	---	---	---	4	---	1	---	---	---	1	2	2
Italy vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
Italy vs. Tunisia	---	---	---	4	---	---	1	---	---	1	1	3
Italy vs. Turkey	---	---	---	4	---	1	1	---	---	1	1	3
Italy vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
Italy vs. UAE	---	---	---	4	---	---	1	---	---	1	1	2
Malaysia vs. Netherlands	---	---	---	4	---	1	---	---	---	---	---	2
Malaysia vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	2	2
Malaysia vs. South Africa	---	---	---	4	---	1	1	---	---	1	---	3
Malaysia vs. Spain	---	---	---	4	---	---	1	---	---	1	2	2
Malaysia vs. Taiwan	---	---	---	4	---	---	1	---	---	---	---	2
Malaysia vs. Tunisia	---	---	---	4	---	---	1	---	---	1	2	4
Malaysia vs. Turkey	---	---	---	4	---	---	2	---	---	---	2	3
Malaysia vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
Malaysia vs. UAE	---	---	---	4	---	---	1	---	---	1	1	2
Netherlands vs. Saudi Arabia	---	---	---	4	---	---	1	---	---	---	1	2
Netherlands vs. South Africa	---	---	---	4	---	---	1	---	---	---	1	2
Netherlands vs. Spain	---	---	---	4	---	1	---	---	---	---	1	2
Netherlands vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
Netherlands vs. Tunisia	---	---	---	4	---	---	1	---	---	---	---	2
Netherlands vs. Turkey	---	---	---	4	---	1	---	---	---	---	---	2
Netherlands vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Netherlands vs. UAE	---	---	---	4	---	---	1	---	---	---	---	2
Saudi Arabia vs. South Africa	---	---	---	4	---	---	1	---	---	---	1	2
Saudi Arabia vs. Spain	---	---	---	4	1	---	1	---	---	---	3	2
Saudi Arabia vs. Taiwan	---	---	---	4	---	---	1	---	---	---	---	2
Saudi Arabia vs. Tunisia	---	---	---	4	---	---	1	---	---	---	2	2
Saudi Arabia vs. Turkey	---	---	---	4	1	---	1	---	---	---	2	2
Saudi Arabia vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Saudi Arabia vs. UAE	---	---	---	4	---	---	1	---	---	---	2	2

Table continued on next page.

Table E-2—Continued

PC strand: Significance of differences other than price between PC strand produced in subject countries and in other countries, by country pair

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
South Africa vs. Spain	---	---	---	4	---	---	1	---	---	1	1	2
South Africa vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
South Africa vs. Tunisia	---	---	---	4	---	---	1	---	---	1	---	3
South Africa vs. Turkey	---	---	---	4	---	---	2	---	---	---	---	3
South Africa vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
South Africa vs. UAE	---	---	---	4	---	---	1	---	---	1	---	2
Spain vs. Taiwan	---	---	---	4	---	1	---	---	---	---	---	2
Spain vs. Tunisia	---	---	---	4	---	---	1	---	---	1	2	2
Spain vs. Turkey	---	---	---	4	1	1	---	---	---	---	2	2
Spain vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Spain vs. UAE	---	---	---	4	---	---	1	---	---	1	2	2
Taiwan vs. Tunisia	---	---	---	4	---	---	1	---	---	1	---	2
Taiwan vs. Turkey	---	---	---	4	---	1	---	---	---	---	---	2
Taiwan vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	2
Taiwan vs. UAE	---	---	---	4	---	---	1	---	---	1	---	2
Tunisia vs. Turkey	---	---	---	4	---	---	2	---	---	---	2	3
Tunisia vs. Ukraine	---	---	---	4	---	---	1	---	---	---	---	3
Tunisia vs. UAE	---	---	---	4	---	---	1	---	---	1	2	2
Turkey vs. Ukraine	---	---	---	4	---	---	2	---	---	---	---	3
Turkey vs. UAE	---	---	---	4	---	---	1	1	---	1	2	2
Ukraine vs. UAE	---	---	---	4	---	---	1	---	---	---	---	2
United States vs. Other	---	---	---	4	---	1	1	---	---	1	1	2
Argentina vs. Other	---	---	---	4	---	1	1	---	---	---	---	2
Colombia vs. Other	---	---	---	4	---	---	2	---	---	1	---	2
Egypt vs. Other	---	---	---	4	---	1	1	---	---	---	---	2
Indonesia vs. Other	---	---	---	4	---	---	2	---	---	1	---	2
Italy vs. Other	---	---	---	4	---	1	1	---	---	1	---	2
Malaysia vs. Other	---	---	---	4	---	---	2	---	---	1	---	2
Netherlands vs. Other	---	---	---	4	---	1	1	---	---	---	---	2
Saudi Arabia vs. Other	---	---	---	4	---	---	2	---	---	---	---	2
South Africa vs. Other	---	---	---	4	---	---	2	---	---	1	---	2
Spain vs. Other	---	---	---	4	---	1	1	---	---	1	---	2
Taiwan vs. Other	---	---	---	4	---	1	1	---	---	1	---	2
Tunisia vs. Other	---	---	---	4	---	---	2	---	---	1	1	1
Turkey vs. Other	---	---	---	4	---	1	1	---	---	1	---	2
Ukraine vs. Other	---	---	---	4	---	---	2	---	---	---	1	1

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

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