

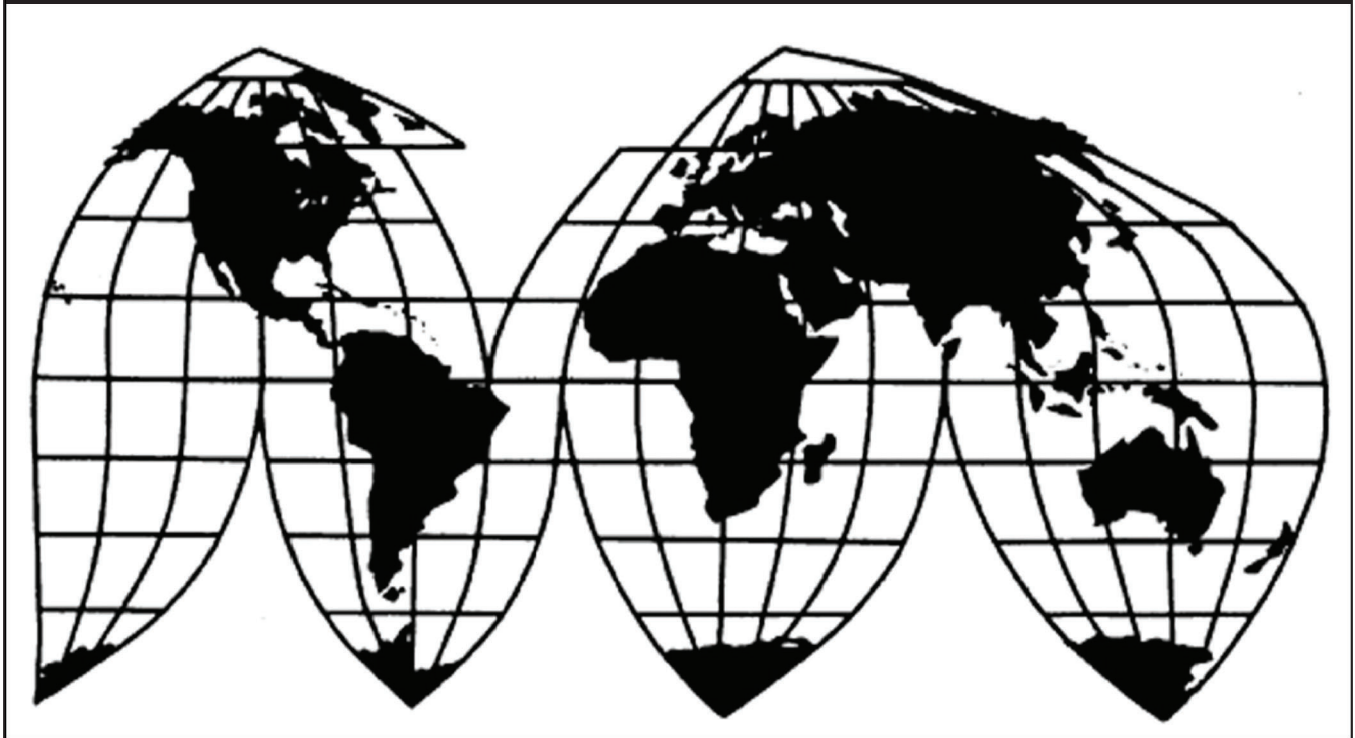
# Wood Mouldings and Millwork Products from China

Investigation Nos. 701-TA-636 and 731-TA-1470 (Final)

Publication 5157

February 2021

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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# U.S. International Trade Commission

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Note.—Information that would reveal confidential operations of individual concerns may not be published.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



## UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation Nos. 701-TA-636 and 731-TA-1470 (Final)

Wood Mouldings and Millwork Products from China

### DETERMINATIONS

On the basis of the record<sup>1</sup> developed in the subject investigations, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that an industry in the United States is materially injured by reason of imports of wood mouldings and millwork products from China, primarily provided for in subheadings 4409.10.40, 4409.10.45, 4409.10.50, 4409.22.40, 4409.22.50, 4409.29.41, and 4409.29.51 of the Harmonized Tariff Schedule of the United States, that have been found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”), and to be subsidized by the government of China.<sup>2</sup>

### BACKGROUND

The Commission instituted these investigations effective January 8, 2020, following receipt of petitions filed with the Commission and Commerce by the Coalition of American Millwork Producers (Bright Wood Corporation, Madras, Oregon; Cascade Wood Products, Inc., White City, Oregon; Endura Products, Inc., Colfax, North Carolina; Sierra Pacific Industries, Red Bluff, California; Sunset Moulding, Live Oak, California; Woodgrain Millwork Inc., Fruitland, Idaho; and Yuba River Moulding, Yuba City, California).<sup>3</sup> The final phase of the investigations was scheduled by the Commission following notification of preliminary determinations by Commerce that imports of wood mouldings and millwork products from China were subsidized within the meaning of section 703(b) of the Act (19 U.S.C. 1671b(b)) and sold at LTFV within the meaning of 733(b) of the Act (19 U.S.C. 1673b(b)). Notice of the scheduling of the final phase of

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

<sup>2</sup> Vice Chair Randolph J. Stayin not participating.

<sup>3</sup> During the final phase of the investigations, Best Moulding Corporation, Albuquerque, New Mexico; Menzner Lumber and Supply Company, Marathon, Wisconsin; and Pacific Wood Laminates, Brookings, Oregon, joined the Coalition of American Millwork Producers.

the Commission's investigations and of a public hearing to be held in connection therewith was given by posting copies of the notice in the Office of the Secretary, U.S. International Trade Commission, Washington, DC, and by publishing the notice in the *Federal Register* on September 2, 2020 (85 FR 54593). 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 22, 2020. All persons who requested the opportunity were permitted to participate.

## Views of the Commission

Based on the record in the final phase of the investigations, we determine that an industry in the United States is materially injured by reason of imports of wood mouldings and millwork products (“WMMP”) from China found by the U.S. Department of Commerce (“Commerce”) to be sold in the United States at less than fair value (“LTFV”) and subsidized by the government of China.<sup>1</sup>

### I. Background

The petitions in these investigations were filed on January 8, 2020 by the Coalition of American Millwork Producers, consisting of domestic producers Bright Wood Corporation, Cascade Wood Products, Inc., Endura Products, Inc., Sierra Pacific Industries, Sunset Moulding, Woodgrain Millwork Inc., and Yuba River Moulding.<sup>2</sup> Petitioners’ representatives and counsel appeared at the hearing accompanied by counsel and submitted prehearing and posthearing briefs and final comments.<sup>3</sup>

Four respondent groups participated actively in the final phase investigations. Representatives and counsel for Associacao Brasileira da Industria de Madeira Processada Mecanicamente (“ABIMCI”), a trade association consisting of Brazilian producers and exporters of WMMP, appeared at the hearing and submitted prehearing and posthearing briefs.<sup>4</sup> Representatives and counsel for JELD-WEN, Inc. (“JELD-WEN”), a domestic producer and importer of WMMP, appeared at the hearing and submitted prehearing and posthearing briefs. Composite Technology International, Inc. (“CTI”) and Weston Wood Solutions, Inc. (collectively, “M&G Respondents”), which import WMMP, jointly submitted prehearing and posthearing

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<sup>1</sup> Commissioner Stayin did not participate in the investigations.

<sup>2</sup> During the final phase of the investigations, Best Moulding Corporation, Menzner Lumber and Supply Company, and Pacific Wood Laminates joined the Coalition of American Millwork Producers. Confidential Report (“CR”)/Public Report (“PR”) at I-1 n.1.

<sup>3</sup> In light of the restrictions on access to the Commission building due to the COVID-19 pandemic, the Commission conducted its hearing by videoconference and written witness testimony as set forth in procedures provided to the parties.

<sup>4</sup> Petitioners originally filed an antidumping duty petition covering WMMP imported from Brazil and antidumping and countervailing duty petitions covering WMMP imported from China, but Commerce issued a final negative antidumping duty determination with respect to Brazil. Wood Mouldings and Millwork Products from Brazil: Final Negative Determination of Sales at Less Than Fair Value, 86 Fed. Reg. 70 (Jan. 4, 2021). Consequently, the Commission terminated the antidumping duty investigation concerning WMMP imported from Brazil. Wood Mouldings and Millwork Products from Brazil: Termination of Investigation, 86 Fed. Reg. 1522 (Jan. 8, 2021).

briefs and final comments. Masonite International Corporation, Masonite Corporation, and Sierra Lumber, Inc. (collectively, “Masonite”), which domestically produce and import WMMP, filed a prehearing brief.

U.S. industry data are based on the questionnaire responses of 15 domestic producers that accounted for the majority of domestic production of WMMP in 2019.<sup>5</sup> U.S. import data are based on the questionnaire responses of 46 U.S. importers of WMMP over the period of investigation, which accounted for \*\*\* percent of subject imports from China and \*\*\* percent of total imports in 2019 based on proprietary Customs records.<sup>6</sup> Data concerning the subject industry is based on questionnaire responses from two foreign producers and four resellers that accounted for less than \*\*\* percent of subject imports from China in 2019.<sup>7</sup>

## **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.”<sup>8</sup> Section 771(4)(A) of the Tariff Act of 1930, as amended (“the Tariff Act”), defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”<sup>9</sup> In turn, the Tariff Act defines “domestic like product” as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to an investigation.”<sup>10</sup>

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<sup>5</sup> CR/PR at I-5.

<sup>6</sup> CR/PR at I-5, IV-1-2. Coverage was calculated based on proprietary Customs records using HTS statistical reporting numbers 4409.10.4010, 4409.10.4090, 4409.10.4500, 4409.10.5000, 4409.22.4000, 4409.22.5000, 4409.29.4100, and 4409.29.5100 (quantity of imports accounted by firms that responded to the Commission’s questionnaire divided by total quantity of imports). Coverage figures may be overstated as firms may import under other HTS statistical reporting numbers classified as “basket” categories and containing substantial out-of-scope products.

<sup>7</sup> CR/PR at VII-3.

<sup>8</sup> 19 U.S.C. § 1677(4)(A).

<sup>9</sup> 19 U.S.C. § 1677(4)(A).

<sup>10</sup> 19 U.S.C. § 1677(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.<sup>11</sup> Therefore, Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value is “necessarily the starting point of the Commission’s like product analysis.”<sup>12</sup> The Commission then defines the domestic like product in light of the imported articles Commerce has identified.<sup>13</sup> The decision regarding the appropriate domestic like product(s) in an investigation is a factual determination, and the Commission has applied the statutory standard of “like” or “most similar in characteristics and uses” on a case-by-case basis.<sup>14</sup> No single factor is dispositive, and the Commission may consider other factors it deems relevant based on the facts of a particular investigation.<sup>15</sup> The Commission looks for clear dividing lines among possible like products and disregards minor variations.<sup>16</sup>

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<sup>11</sup> 19 U.S.C. § 1677(10). The Commission must accept Commerce’s determination as to the scope of the imported merchandise that is subsidized and/or sold at less than fair value. *See, e.g., USEC, Inc. v. United States*, 34 Fed. App’x 725, 730 (Fed. Cir. 2002) (“The ITC may not modify the class or kind of imported merchandise examined by Commerce.”); *Algoma Steel Corp. v. United States*, 688 F. Supp. 639, 644 (Ct. Int’l Trade 1988), *aff’d*, 865 F.3d 240 (Fed. Cir.), *cert. denied*, 492 U.S. 919 (1989).

<sup>12</sup> *Cleo Inc. v. United States*, 501 F.3d 1291, 1298 (Fed. Cir. 2007); *see also Hitachi Metals, Ltd. v. United States*, Case No. 19-1289, slip op. at 8-9 (Fed. Cir. Feb. 7, 2020) (the statute requires the Commission to start with Commerce’s subject merchandise in reaching its own like product determination).

<sup>13</sup> *Cleo*, 501 F.3d at 1298 n.1 (“Commerce’s {scope} finding does not control the Commission’s {like product} determination.”); *Hosiden Corp. v. Advanced Display Mfrs.*, 85 F.3d 1561, 1568 (Fed. Cir. 1996) (the Commission may find a single like product corresponding to several different classes or kinds defined by Commerce); *Torrington 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).

<sup>14</sup> *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).

<sup>15</sup> *See, e.g., S. Rep. No. 96-249 at 90-91 (1979).*

<sup>16</sup> *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 (Continued...)

## **B. Product Description**

Commerce defined the imported merchandise within the scope of the investigations as follows:

The merchandise subject to these investigations consists of wood mouldings and millwork products that are made of wood (regardless of wood species), bamboo, laminated veneer lumber (LVL), or of wood and composite materials (where the composite materials make up less than 50 percent of the total merchandise), and which are continuously shaped wood that undergoes additional manufacturing or finger-jointed or edge glued moulding or millwork blanks (whether or not resawn).

The percentage of composite materials contained in a wood moulding or millwork product is measured by length, except when the composite material is a coating or cladding. Wood mouldings and millwork products that are coated or clad, even along their entire length, with a composite material, but that are otherwise comprised of wood, LVL, or wood and composite materials (where the non-coating composite materials make up 50 percent or less of the total merchandise) are covered by the scope.

The merchandise subject to these investigations consists of wood, LVL, bamboo, or a combination of wood and composite materials that is continuously shaped throughout its length (with the exception of any endwork/dados), profiled wood having a repetitive design in relief, similar milled wood architectural accessories, such as rosettes and plinth blocks, and finger-jointed or edge-glued moulding or millwork blanks (whether or not resawn). The scope includes continuously shaped wood in the forms of dowels, building components such as interior paneling and jamb parts, and door components such as rails and stiles.

The covered products may be solid wood, laminated, finger-jointed, edge-

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(...Continued)

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.").

Glued, face-glued, or otherwise joined in the production or remanufacturing process and are covered by the scope whether imported raw, coated (e.g., gesso, polymer, or plastic), primed, painted, stained, wrapped (paper or vinyl overlay), any combination of the aforementioned surface coatings, treated, or which incorporate rot-resistant elements (whether wood or composite). The covered products are covered by the scope whether or not any surface coating(s) or covers obscures the grain, textures, or markings of the wood, whether or not they are ready for use or require final machining (e.g., endwork/dado, hinge/strike machining, weatherstrip or application thereof, mitre) or packaging.

All wood mouldings and millwork products are included within the scope even if they are trimmed; cut-to-size; notched; punched; drilled; or have undergone other forms of minor processing.

Subject merchandise also includes wood mouldings and millwork products that have been further processed in a third country, including but not limited to trimming, cutting, notching, punching, drilling, coating, or any other processing that would not otherwise remove the merchandise from the scope of the investigations if performed in the country of manufacture of the in-scope product.

Excluded from the scope of these investigations are exterior fencing, exterior decking and exterior siding products (including solid wood siding, non-wood siding (e.g., composite or cement), and shingles) that are not LVL or finger jointed; finished and unfinished doors; flooring; parts of stair steps (including newel posts, balusters, easing, gooseneck, risers, treads and rail fittings); and picture frame components three feet and under in individual lengths.

Excluded from the scope of these investigations are all products covered by the scope of the antidumping and countervailing duty orders on Hardwood Plywood from the People's Republic of China. See Certain Hardwood Plywood Products from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value, and

Antidumping Duty Order, 83 FR 504 (January 4, 2018); Certain Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order, 83 FR 513 (January 4, 2018).

Excluded from the scope of these investigations are all products covered by the scope of the antidumping and countervailing duty orders on Multilayered Wood Flooring from the People's Republic of China. See Multilayered Wood Flooring from the People's Republic of China: Amended Final Determination of Sales at Less Than Fair Value and Antidumping Duty Order, 76 FR 76690 (December 8, 2011); Multilayered Wood Flooring from the People's Republic of China: Countervailing Duty Order, 76 FR 76693 (December 8, 2011).<sup>17</sup>

WMMP are lengths of wood molded into various shapes, or profiles, for use in a wide variety of functional and decorative applications in residential and non-residential construction.<sup>18</sup> They can be manufactured from solid or, more commonly, finger-jointed softwood or hardwood lumber; laminated veneer lumber (“LVL”); or some combination of wood and composite materials.<sup>19</sup> Depending on their profile and length, WMMP may be used as crown mouldings, interior and exterior door frames or jambs, astragals, base caps, corner guards, base shoes, brickmoulds, drip caps, and battens, among other applications.<sup>20</sup> WMMP are sold to distributors, construction companies and contractors, lumber wholesalers, and home improvement retailers.<sup>21</sup>

WMMP are produced by mills in two stages: “front end” and then “back end”. In the front end for solid or finger-jointed product, the mill produces solid or finger-jointed “blanks” by scanning raw lumber for imperfections and then “ripping” or cutting the board to maximize the number of clear cuts free from imperfections.<sup>22</sup> The mill then cuts the ripped boards to

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<sup>17</sup> *Wood Mouldings and Millwork Products From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 63, 67 (Jan. 4, 2021); *Wood Mouldings and Millwork Products from the People's Republic of China: Final Affirmative Countervailing Duty Determination*, 86 Fed. Reg. 67, 70 (Jan. 4, 2021).

<sup>18</sup> CR/PR at I-12.

<sup>19</sup> CR/PR at I-13, 19. LVL is an engineered wood product consisting of multiple layers of thin wood glued together and cured with heat and pressure. *Id.* at I-20 n.42.

<sup>20</sup> See CR/PR at I-12-18.

<sup>21</sup> CR/PR at I-18.

<sup>22</sup> CR/PR at I-19.



specific lengths, and for finger jointed blanks cuts the ends of the lengths, and glues the finger-jointed lengths together into longer, solid blanks.<sup>23</sup> The front end for LVL WMMP entails a “layup” process whereby glue is applied to thin layers of wood that are then cured with heat and pressure to form LVL blanks.<sup>24</sup>

In the second stage, known as the “back end,” the blanks are fed through one or more molders that grind and cut the blanks into the desired shape or profile, with multiple stages of molding required for more sophisticated profiles.<sup>25</sup> After molding, WMMP may be further processed through drilling, notching, punching, or other operations, and then coated by gesso, painting, priming, or other surface cover.<sup>26</sup>

### **C. Arguments of the Parties**

*Petitioners’ Argument.* Petitioners argue that the record of the final phase investigations continues to support the Commission’s definition of the domestic like product from the preliminary determinations – that is, all WMMP described by the scope of the investigations, including LVL WMMP.<sup>27</sup> They also contend that the Commission should not define the domestic like product to include medium density fiberboard mouldings and millwork products (“MDF MMP”), which is outside the scope of the investigations.

Petitioners argue that LVL WMMP is similar to other WMMP in that all are produced from wood and glue and possess the same end uses, including decorative applications such as baseboards and wainscoting and structural applications such as interior and exterior wood door frames and jambs and window components.<sup>28</sup> They contend that LVL WMMP is fully interchangeable with other WMMP when produced to the same dimensions, given that all moulding and millwork patterns are the same whether made from LVL or finger-jointed wood.<sup>29</sup> Petitioners claim that LVL WMMP, like other types of WMMP, are sold to distributors and retailers, as well as to door manufacturers, and are perceived by producers and customers as part of a continuum of WMMP products.<sup>30</sup> They contend that LVL WMMP can be produced in

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<sup>23</sup> CR/PR at I-19-20.

<sup>24</sup> CR/PR at I-20 n.42; M&G Respondents’ Prehearing Brief at 12.

<sup>25</sup> CR/PR at I-20.

<sup>26</sup> CR/PR at I-21.

<sup>27</sup> Petitioners’ Prehearing Brief at 5-6 (citing Preliminary Determinations, USITC Pub. 5030 at 14).

<sup>28</sup> Petitioners’ Prehearing Brief at 8.

<sup>29</sup> Petitioners’ Prehearing Brief at 11.

<sup>30</sup> Petitioners’ Prehearing Brief at 14-16; Petitioners’ Responses to Commissioner Questions at 9, Exhibit 13; CR/PR at Table I-7.

the same production facilities as WMMP, using the same back end production processes, and would be produced given sufficient customer demand for LVL WMMP and the absence of unfairly priced imports of LVL WMMP from China.<sup>31</sup> Finally, petitioners argue that the prices of LVL WMMP and other WMMP are comparable, with \*\*\*.<sup>32</sup>

Petitioners further argue that the Commission should not define the domestic like product to include MDF MMP, which is out-of-scope. Whereas WMMP is made of wood or finger-jointed wood, petitioners argue, MDF MMP is made from sawdust and shavings mixed with urea-formaldehyde and wax and processed into panels using high heat and intense pressure.<sup>33</sup> According to them, the different constituent materials of MDF MMP render it unsuitable for structural applications, exterior applications, applications requiring small profiles, and wet or humid environments.<sup>34</sup> Petitioners argue that these limitations on the use of MDF MMP serve to limit its interchangeability with WMMP.<sup>35</sup> While acknowledging a degree of overlap in terms of channels of distribution, petitioners claim that producers and customers perceive MDF MMP as separate and distinct from WMMP.<sup>36</sup> Petitioners also argue that compared to WMMP, MDF MMP requires entirely different production facilities and processes at the front end and different molds and tooling at the back end.<sup>37</sup> Finally, petitioners claim that WMMP is priced significantly higher than MDF MMP.<sup>38</sup>

*Respondents' Arguments.* Respondents JELD-WEN, Masonite, and the M&G Respondents argue that the Commission should define two domestic like products: (1) LVL WMMP; and (2) all other WMMP described in the scope of the investigations. The M&G Respondents also argue that the second domestic like product, all other WMMP, should be

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<sup>31</sup> Petitioners' Prehearing Brief at 19; Petitioners' Responses to Commissioner Questions at 11, 15-16, Exhibit 13; Hearing Tr. at 117 (MacDonald).

<sup>32</sup> Petitioners' Prehearing Brief at 21-22; Petitioners' Responses to Commissioner Questions at 10, 17, Exhibit 13; CR/PR at Table I-5.

<sup>33</sup> Petitioners' Prehearing Brief, Exhibit 1 at 2.

<sup>34</sup> See Petitioners' Prehearing Brief, Exhibit 1 at 3-7; Petitioners' Responses to Commissioner Questions at 21-22. Petitioners note that a major domestic producer of MDF MMP, Pacific MDF Products, has the disclaimer "Interior Use Only" on every page of its website. Petitioners' Responses to Commissioner Questions at 22, Exhibit 14.

<sup>35</sup> See Petitioners' Prehearing Brief, Exhibit 1 at 7-9.

<sup>36</sup> Petitioners' Prehearing Brief, Exhibit 1 at 10-11; CR/PR at Table I-7; Petitioners' Responses to Commissioner Questions at 25; Hearing Tr. at 114 (Easton) (stating that in negotiations over finger-jointed WMMP with Woodgrain's distribution group, which handles both MDF MMP and WMMP, they "never discuss" MDF prices), 114 (Procton) (stating that "MDF is not in our market").

<sup>37</sup> Petitioners' Prehearing Brief, Exhibit 1 at 14-15.

<sup>38</sup> Petitioners' Prehearing Brief, Exhibit 1 at 19-20; Petitioners' Responses to Commissioner Questions at 24; CR/PR at Table I-9.

expanded to include out-of-scope MDF MMP.<sup>39</sup> Respondent ABIMCI argues that the Commission should define a single domestic like product including both WMMP and out-of-scope MDF MMP, and takes no position on LVL WMMP.<sup>40</sup>

Respondents argue that LVL WMMP differs from all other WMMP within the scope of the investigations under each of the Commission's traditional like product factors. While other WMMP are produced from finger-jointed lumber, LVL WMMP is produced from multiple layers of thin wood pressed together with adhesive.<sup>41</sup> Due to its superior performance, respondents claim that LVL WMMP is preferred to finger-jointed WMMP in structural applications.<sup>42</sup> In their view, the qualitative superiority of LVL WMMP also limits its interchangeability with finger-jointed WMMP in the same end uses, and particularly in door frame applications and external doors subject to extreme weather.<sup>43</sup> Respondents argue that the production processes for LVL WMMP differ from those for finger-jointed WMMP completely at the front end, although the back end processes are similar.<sup>44</sup> While acknowledging that LVL WMMP and finger-jointed WMMP are sold through "comparable" channels of distribution,<sup>45</sup> respondents argue that customers view LVL WMMP as distinct from finger-jointed WMMP due to its superior performance.<sup>46</sup> Finally, respondents argue that LVL WMMP generally commands a price premium over finger-jointed WMMP in customized applications, but can be less expensive than finger-jointed WMMP due to its advanced production process.<sup>47</sup>

With respect to MDF MMP, respondents argue that MDF MMP is similar to WMMP in that both are made of wood fiber, albeit in different forms, and processed into standard profiles for use as decorative trim in home interiors.<sup>48</sup> While acknowledging that MDF MMP cannot be used in high moisture and external applications,<sup>49</sup> respondents contend that MDF

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<sup>39</sup> M&G Respondents' Prehearing Brief at 33.

<sup>40</sup> ABIMCI's Prehearing Brief at 5 & n.3.

<sup>41</sup> M&G Respondents' Prehearing Brief at 6; Masonite's Prehearing Brief at 5; JELD-WEN's Prehearing Brief at 3.

<sup>42</sup> M&G Respondents' Prehearing Brief at 10; Masonite's Prehearing Brief at 5; JELD-WEN's Prehearing Brief at 5.

<sup>43</sup> M&G Respondents' Prehearing Brief at 13-14; Masonite's Prehearing Brief at 5-6; JELD-WEN's Prehearing Brief at 4.

<sup>44</sup> M&G Respondents' Prehearing Brief at 12; Masonite's Prehearing Brief at 7-8; JELD-WEN's Prehearing Brief at 4-5.

<sup>45</sup> JELD-WEN's Prehearing Brief at 4.

<sup>46</sup> M&G Respondents' Prehearing Brief at 16-18; JELD-WEN's Prehearing Brief at 5.

<sup>47</sup> M&G Respondents' Prehearing Brief at 19-20; JELD-WEN's Prehearing Brief at 5.

<sup>48</sup> ABIMCI's Prehearing Brief at 8; M&G Respondents' Prehearing Brief at 34-35.

<sup>49</sup> ABIMCI's Prehearing Brief at 9-10; M&G Respondents' Prehearing Brief at 35-36 ("MDF MMP \*\*\*"); Conference Tr. at 115 (Ammons), 124 (Burke).

MMP and WMMP are interchangeable in most end uses.<sup>50</sup> Respondents claim that MDF MMP and WMMP are sold through the same channels of distribution, to distributors and retailers,<sup>51</sup> and that they overlap in terms of production facilities, processes, and employees at the back end.<sup>52</sup> Respondents claim that customers view MDF MMP as a viable alternative to finger-jointed WMMP in interior applications, although not for high moisture and external applications.<sup>53</sup> Finally, respondents acknowledge that MDF MMP prices are lower than WMMP prices, but ABIMCI argues that there is also a high degree of price variation between different types of WMMP.<sup>54</sup>

#### **D. Domestic Like Product Analysis**

Based on the record, we define a single domestic like product consisting of all WMMP, coextensive with the scope of the investigations.

##### **1. Whether to Define LVL WMMP as a Separate Domestic Like Product**

*Physical Characteristics and Uses.* There are similarities between LVL WMMP and other in-scope WMMP, primarily finger-jointed WMMP as well as solid lumber WMMP, in terms of physical characteristics and uses. LVL WMMP and other WMMP are both made of wood fiber molded or carved into the same shapes and dimensions.<sup>55</sup> LVL WMMP is typically used in structural applications such as interior and exterior window and door frames, which are also leading applications for other WMMP.<sup>56</sup> Indeed, \*\*\*.<sup>57</sup>

There are some differences between LVL WMMP and other WMMP as well. LVL WMMP is made from LVL, an engineered wood product made from thin veneers of wood glued

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<sup>50</sup> ABIMCI's Prehearing Brief at 15; M&G Respondents' Prehearing Brief at 38-40.

<sup>51</sup> ABIMCI's Prehearing Brief at 18; M&G Respondents' Prehearing Brief at 40. We note that \*\*\* U.S. shipments of MDF MMP were made to retailers and end users, which accounted for \*\*\* of U.S. shipments of WMMP during the period of investigation. CR/PR at Table I-10.

<sup>52</sup> ABIMCI's Prehearing Brief at 11; M&G Respondents' Prehearing Brief at 37-38; Conference Tr. at 100 (Caldwell); see Petitioners' Prehearing Brief at 27-29 (arguing that finishers that produce WMMP using back end operations alone engage in sufficient production-related activities to qualify as domestic producers).

<sup>53</sup> ABIMCI's Prehearing Brief at 17-18; M&G Respondents' Prehearing Brief at 40.

<sup>54</sup> ABIMCI's Prehearing Brief at 19-20; M&G Respondents' Prehearing Brief at 41.

<sup>55</sup> CR/PR at I-20; Petitioners' Prehearing Brief at 11; Conference Tr. at 62 (Procton), 139 (Reid).

<sup>56</sup> CR/PR at Tables IV-6, E-2, F-1; M&G Respondents' Prehearing Brief at 10; Petitioners' Prehearing Brief at 8; Hearing Tr. at 80-81 (Easton); Conference Tr. at 140 (Settje).

<sup>57</sup> CR/PR at Table F-2.

together and cured using heat and pressure.<sup>58</sup> Other in-scope WMMP, by contrast, is typically made from finger-jointed lumber or solid lumber.<sup>59</sup> The engineered nature of LVL typically imparts superior performance characteristics to WMMP made from it, including higher strength, greater stability, and greater resistance to damage, relative to finger-jointed WMMP (but not necessarily WMMP made from solid lumber).<sup>60</sup> These properties can make it easier to manufacture LVL WMMP in ways that comply with certain industry standards and state and local building regulations, such as standards for door frames subjected to extreme weather conditions, as compared to other WMMP products.<sup>61</sup> Use of LVL in the manufacturing process can also result in better quality door frames and lower scrap rates during the door frame manufacturing process.<sup>62</sup> The physical properties of LVL WMMP can also make it harder to nail and cut than other WMMP, prompting some customers to prefer other WMMP for certain applications.<sup>63</sup>

Despite these distinctions in certain situations, most responding domestic producers reported that other in-scope WMMP is fully or mostly comparable to LVL WMMP in terms of physical characteristics and uses, while a majority of responding importers and a plurality of purchasers reported that other WMMP is somewhat comparable to LVL WMMP in terms of this factor.<sup>64</sup>

*Manufacturing Facilities, Production Processes, and Production Employees.* LVL WMMP is made in separate manufacturing facilities using different employees than other WMMP. The only known domestic producer of LVL WMMP, Pacific Wood Laminates, \*\*\*.<sup>65</sup> However, \*\*\*.<sup>66</sup> The front-end production processes differ between LVL WMMP and other WMMP, which primarily consists of finger-jointed WMMP. LVL production requires laying up veneers with lap

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<sup>58</sup> CR/PR at I-20 n.42.

<sup>59</sup> CR/PR at I-19-20.

<sup>60</sup> CR/PR at Tables F-1-3; M&G's Prehearing Brief at 6; JELD-WEN's Prehearing Brief at 3; Masonite's Prehearing Brief at 5; Hearing Tr. at 182 (Dixon); Conference Tr. at 98 (Caldwell), 109 (Reid), 140 (Settje).

<sup>61</sup> M&G Respondents' Prehearing Brief at 16-18; JELD-WEN's Prehearing Brief at 5; Masonite Prehearing Brief at 5-6; CR/PR at Table F-2 (comments on physical characteristics and producer and customer perceptions by \*\*\*); Hearing Tr. at 182 (Dixon).

<sup>62</sup> Hearing Tr. at 182 (Dixon); JELD-WEN's Prehearing Brief at 5.

<sup>63</sup> See CR/PR at Table F-3 (comments on physical characteristics and uses by \*\*\*, and comments on producer and customer perceptions by \*\*\*). Higher grade solid wood WMMP tends to be used for stained trim, while finger-jointed and LVL WMMP is used for painted trim. CR/PR at I-13.

<sup>64</sup> CR/PR at Table I-3.

<sup>65</sup> CR/PR at Table I-4.

<sup>66</sup> Declaration of \*\*\*, appended as Exhibit 13 to Petitioners' Posthearing Brief, at ¶ 2; Petitioners' Responses to Commissioner Questions at 11.

joints, applying adhesive, and curing the LVL using heat and pressure.<sup>67</sup> Finger-jointed lumber production requires optical scanning for defects, ripping boards to remove defects, cutting and finger jointing the boards, and then gluing the finger-jointed boards together into long blanks.<sup>68</sup> On the other hand, the back-end production processes for making all WMMP, including LVL WMMP and other WMMP, are similar.<sup>69</sup>

A majority of responding domestic producers reported that other in-scope WMMP is fully or mostly comparable to LVL WMMP in terms of manufacturing facilities, production processes, and production employees. On the other hand, a majority of responding importers and a plurality of responding purchasers reported that other WMMP is somewhat comparable to LVL WMMP in terms of this factor.<sup>70</sup>

*Channels of Distribution.* LVL WMMP and other in-scope WMMP are sold through similar channels of distribution, *i.e.*, to distributors and retailers.<sup>71</sup> A majority of responding domestic producers, importers, and purchasers reported that other WMMP is fully or mostly comparable to LVL WMMP in terms of channels of distribution.<sup>72</sup>

*Interchangeability.* The record indicates that LVL WMMP and other WMMP may be used interchangeably in most applications,<sup>73</sup> although some customers prefer LVL WMMP in certain applications such as fiberglass doors and external doors subject to high winds and moisture.<sup>74</sup> The three most common applications for LVL WMMP, external door frames, door stiles, and quarter rounds, are also served by other WMMP.<sup>75</sup> \*\*\*.<sup>76</sup> Indeed, \*\*\*.<sup>77</sup> That JELD-WEN increasingly replaced finger-jointed WMMP with LVL WMMP in its door frame

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<sup>67</sup> CR/PR at I-20 n.42.

<sup>68</sup> CR/PR at I-19-20.

<sup>69</sup> CR/PR at I-20; Petitioners' Responses to Commissioner Questions at 11, Exhibit 13; M&G Prehearing Brief at 12; Hearing Tr. at 32 (Easton), 117 (MacDonald); Conference Tr. at 108-9 (Reid), 180 (Brightbill).

<sup>70</sup> CR/PR at Table I-3.

<sup>71</sup> CR/PR at Table I-6.

<sup>72</sup> CR/PR at Table I-3.

<sup>73</sup> See Hearing Tr. at 80-81 (Easton); Declaration of \*\*\*, appended as Exhibit 2 to Petitioners' Posthearing Brief, at ¶¶2-5; Declaration of \*\*\*, appended as Exhibit 13 to Petitioners' Posthearing Brief, at ¶3; CR/PR at Tables F-2 (comments on interchangeability by \*\*\*), F-3 (comments on interchangeability by \*\*\*). We note that \*\*\* and \*\*\* were among the three largest importers/purchasers of WMMP. CR/PR at I-4 n.9, II-3.

<sup>74</sup> Masonite's Prehearing Brief at 5-6; CR/PR at Table F-3 (\*\*\*) ; Petitioners' Prehearing Brief at 11-12; Conference Tr. at 16-17 (Grimson).

<sup>75</sup> Hearing Tr. at 80-81 (Easton).

<sup>76</sup> Declaration of \*\*\*, appended as Exhibit 2 to Petitioners' Posthearing Brief, at ¶¶ 3, 5, Attachment 1.

<sup>77</sup> CR/PR at Table F-3.

manufacturing operations during the period of investigation also suggests a high degree of interchangeability between them.<sup>78</sup> Consistent with this evidence, \*\*\*.”<sup>79</sup>

Most responding domestic producers reported that other in-scope WMMP is fully or mostly interchangeable with LVL WMMP, while a majority of responding importers reported that other WMMP is somewhat interchangeable with LVL WMMP.<sup>80</sup> Although a plurality of responding purchasers reported that other WMMP is somewhat interchangeable with LVL WMMP, half reported that the two types of WMMP are fully or mostly interchangeable.<sup>81</sup>

*Producer and Customer Perceptions.* There are similarities between LVL WMMP and other WMMP in terms of producer and customer perceptions. Customers view LVL WMMP and other WMMP as similar insofar as both come in the same shapes and can be used in many of the same applications, including in door frames.<sup>82</sup> \*\*\*, considers LVL and finger-jointed WMMP “largely substitutable and interchangeable” and states that its “customers often view LVL and finger-jointed WMMP as comparable and substitutable.”<sup>83</sup>

There are also some differences in customer and producer perceptions. Some customers perceive LVL WMMP as offering certain advantages over other WMMP, such as greater stability, strength, and quality, that make it preferable to finger-jointed WMMP in certain applications.<sup>84</sup> Moreover, individual domestic producers specialize in the production of either LVL WMMP or other WMMP.<sup>85</sup>

Most responding domestic producers reported that other in-scope WMMP is fully or mostly comparable to LVL WMMP in terms of customer and producer perceptions, while a majority of responding importers and a plurality of purchasers reported that other WMMP is somewhat comparable to LVL WMMP in terms of this factor.<sup>86</sup>

*Price.* LVL WMMP generally commands a \*\*\* price premium over comparable other in-scope WMMP, but can also be priced lower.<sup>87</sup> During the period of investigation, the average unit value of U.S. shipments of domestically produced LVL WMMP was \*\*\* to \*\*\* percent

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<sup>78</sup> Hearing at 182-83 (Dixon); JELD-WEN’s Posthearing Brief at 11.

<sup>79</sup> CR/PR at Table F-2.

<sup>80</sup> CR/PR at Table I-3.

<sup>81</sup> CR/PR at Table I-3.

<sup>82</sup> CR/PR at Tables F-1-3; Hearing Tr. at 80 (Gartman), 80-81 (Easton).

<sup>83</sup> Declaration of \*\*\*, appended as Exhibit 13 to Petitioners’ Posthearing Brief, at ¶¶2-3.

<sup>84</sup> See CR/PR at Table F-3 (Responding purchasers \*\*\* reported a preference for LVL WMMP over finger-jointed WMMP); JELD-WEN’s Posthearing Brief at 7; Hearing Tr. at 182-83 (Dixon).

<sup>85</sup> CR/PR at Table I-4.

<sup>86</sup> CR/PR at Table I-3.

<sup>87</sup> Declaration of \*\*\*, appended as Exhibit 13 to Petitioners’ Posthearing Brief, at ¶4.

higher than the average unit value of U.S. shipments of other types of domestically produced WMMP.<sup>88</sup> On the other hand, 13 of 19 responding purchasers commented that LVL WMMP is priced the same or less than comparable other WMMP.<sup>89</sup> Consistent with these responses, the M&G Respondents claim that LVL WMMP can be less expensive than comparable other WMMP due to its more advanced production process that allows for certain engineering efficiencies, but typically commands a price premium in customized applications.<sup>90</sup>

Most responding domestic producers reported that other in-scope WMMP is either mostly or somewhat comparable to LVL WMMP in terms of price, while majorities of responding importers and purchasers reported that other WMMP is somewhat comparable to LVL WMMP in terms of this factor.<sup>91</sup>

*Conclusion.* In its preliminary determinations, the Commission defined a single domestic like product coextensive with the scope, including both LVL WMMP and all other types of WMMP, based upon the preponderance of similarities between LVL WMMP and other WMMP.<sup>92</sup> We find that the record of the final phase investigations continues to support the definition of a single domestic like product including both LVL WMMP and other WMMP.

While the record continues to show both similarities and differences between LVL WMMP and other WMMP, including primarily finger-jointed WMMP but also solid wood WMMP, there remain a preponderance of similarities between LVL WMMP and other WMMP. There are similarities in terms of physical characteristics and uses, interchangeability, channels of distribution, customer and producer perceptions, production processes, and price. LVL WMMP and other WMMP are made of wood molded into the same shapes for use in many of the same applications, can be used interchangeably in these applications, are sold through similar channels of distribution, are produced using similar back-end equipment and production

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<sup>88</sup> CR/PR at Table I-5. We recognize that average unit value comparisons would be influenced by differences and changes in product mix, given the many different types of WMMP at different price points. *See, e.g.*, CR/PR at Table E-2.

<sup>89</sup> *See* CR/PR at Table F-3 (comments on price comparability by \*\*\*). During the period of investigation, subject import prices for product 7, an LVL product, were \*\*\* than subject import prices for product 3, an otherwise comparable product made from pine/fir, and \*\*\* than domestic prices for product 3. *See* CR/PR at Tables V-5 and V-9.

<sup>90</sup> M&G Respondents' Prehearing Brief at 19-20.

<sup>91</sup> CR/PR at Table I-3.

<sup>92</sup> *See WMMP from Brazil and China*, Inv. Nos. 701-TA-636 and 731-TA-1469-1470 (Preliminary), USITC Pub. 5030 (Mar. 2020) at 13-14 ("Preliminary Determinations").



processes, and are comparable in terms of price.<sup>93</sup> The record suggests that many customers and producers, including \*\*\*, perceive LVL WMMP and other WMMP as comparable and suitable for the same end uses.<sup>94</sup>

We recognize that there are also some differences between the two LVL WMMP and other WMMP in terms of physical characteristics and uses; manufacturing facilities, processes, and employees; and customer and producer perceptions. Unlike other in-scope WMMP made from lumber, LVL WMMP is produced from an engineered wood product, LVL, which may have some advantages for certain applications (but not others). Based on these physical properties, certain customers may prefer LVL WMMP or other WMMP depending on the application.<sup>95</sup> Furthermore, LVL WMMP involves different front-end (but not back-end) production processes than other WMMP and is currently produced in a different manufacturing facility than other WMMP.<sup>96</sup>

On balance, the record continues to show that there are more similarities than differences between LVL WMMP and other in-scope WMMP in terms of the Commission's domestic like product factors.<sup>97</sup> We do not view the differences between LVL WMMP and other WMMP as sufficient to demarcate a clear dividing line separating LVL WMMP from other WMMP but rather as consistent with a continuum of WMMP products which also includes WMMP made from finger-jointed and solid lumber. The qualitative differences between LVL WMMP and other types of WMMP may cause some customers to prefer one type of WMMP over another in particular applications but do not preclude the use of either product in most applications based on their physical similarities. Therefore, we define a single domestic like product including LVL WMMP and other in-scope WMMP.

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<sup>93</sup> CR/PR at I-20, Tables I-3, I-6, IV-5, F-1-3; Declaration of \*\*\*, appended as Exhibit 13 to Petitioners' Posthearing Brief, at ¶ 2; Petitioners' Responses to Commissioner Questions at 11; M&G Prehearing Brief at 12; Hearing Tr. at 32 and 80-81 (Easton), 117 (MacDonald), and 182-83 (Dixon).

<sup>94</sup> See CR/PR at Tables F-1-3; Hearing Tr. at 80 (Gartman), 80-81 (Easton); Declaration of \*\*\*, appended as Exhibit 13 to Petitioners' Posthearing Brief, at ¶¶ 2-3.

<sup>95</sup> See M&G Respondents' Prehearing Brief at 16-18; JELD-WEN's Prehearing Brief at 5; Masonite Prehearing Brief at 5; CR/PR at Tables F-2, F-3; Hearing Tr. at 182 (Dixon).

<sup>96</sup> CR/PR at I-20, Table I-4.

<sup>97</sup> We also note that the scope is not limited to LVL WMMP and finger-jointed WMMP but also includes solid lumber WMMP, which shares many similarities to both of these products.

## 2. Whether to Define the Domestic Like Product to Include Out-of-Scope MDF MMP

*Physical Characteristics and Uses.* Out-of-scope MDF MMP and in-scope WMMP share some general physical characteristics and uses. Both are composed of or derived from wood and processed into standard profiles in a molding facility.<sup>98</sup> Both function as decorative trim in home interiors, including in interior door frames, and are claimed to be virtually indistinguishable once finished and primed.<sup>99</sup>

But, there are also many differences between MDF MMP and WMMP. While WMMP is made of wood, whether solid, finger-jointed, or veneers manufactured into LVL, MDF MMP is made from sawdust and shavings mixed with resin and formed into MDF panels under heat and pressure.<sup>100</sup> MDF MMP is weaker, does not hold a nail or screw as well, and is less resistant to moisture than WMMP.<sup>101</sup> WMMP is shaped using steel blades, which permit complex profiles, whereas MDF MMP is shaped using carbide blades, which limit MDF MMP to softer profiles.<sup>102</sup>

Although MDF MMP and WMMP can be molded into many of the same profiles,<sup>103</sup> MDF MMP's differing physical characteristics serve to limit its uses relative to WMMP. WMMP may be used in the full range of structural and decorative applications, both external or internal.<sup>104</sup> By contrast, MDF MMP is unsuitable for external applications and wet environments such as in bathrooms, and generally unsuitable for small profiles and structural applications.<sup>105</sup> The softer

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<sup>98</sup> See ABIMCI's Prehearing Brief at 8-9; CR/PR at Table G-3 (\*\*\*).

<sup>99</sup> See ABIMCI's Prehearing Brief at 9; Hearing Tr. at 158 (Burke), 164-65 (Ammons), 203 (Dixon); Conference Tr. at 101 (Caldwell), 115 (Ammons), 124, 215 (Burke).

<sup>100</sup> CR/PR at I-22 n.49; Hearing Tr. at 121 (Easton), 158 (Burke).

<sup>101</sup> See CR/PR at Tables G-1-3 (comments on physical characteristics and uses); Hearing Tr. at 19 (Brightbill), 38 (Procton), 47 (Trapp), 80 (Gartman); see also Conference Tr. at 57, 60 (Procton), 61 (Gartman), 124 (Burke), 174 (Casey).

<sup>102</sup> Petitioners' Postconference Brief, Exhibit 1 at 27.

<sup>103</sup> See ABIMCI's Prehearing Brief at 8; CR/PR at Table G-3 (\*\*\*).

<sup>104</sup> See CR/PR at I-12-18.

<sup>105</sup> Petitioners' Prehearing Brief at 74 (stating that MDF MMP cannot be used in "all structural or support applications, and as small profiles such as quarter rounds and base shoes; split jambs; exterior door frames; closet rods; hand rails; mull posts; brickmould; dowels; and structural boards"); ABIMCI's Prehearing Brief at 10; M&G Respondents' Prehearing Brief at 36; Petitioners' Posthearing Brief at 22, Exhibit 14 (Pacific MDF Products, a domestic MDF MMP producer, includes the disclaimer "Interior use only" on each page of its website); Hearing Tr. 47 (Trapp). We note that ABIMCI cites limited examples of small profiles and interior door jambs made of MDF, which do not suggest that MDF is widely used in such applications. See ABIMCI's Responses to Commissioner Questions at 26 (citing evidence that MDF can be used in small profiles, specifically quarter rounds sold at Home Depot, and "some evidence" that MDF can be used in structural applications, specifically MDF interior door jambs sold by Lowe's), (Continued...)

profiles of MDF MMP make it ideal for simple mouldings but inappropriate for complex mouldings.<sup>106</sup>

Most responding domestic producers, a majority of responding importers, and a plurality of responding purchasers reported that WMMP is somewhat comparable to MDF MMP in terms of physical characteristics and uses.<sup>107</sup>

*Manufacturing Facilities, Production Processes, and Production Employees.* MDF MMP is generally made in different manufacturing facilities with different employees and equipment, and different front-end production processes, than WMMP. The Commission identified \*\*\* U.S. producers that produce only MDF MMP.<sup>108</sup> \*\*\* domestic producers reported producing only WMMP, \*\*\* reported producing WMMP and MDF MMP using separate machinery and/or employees, and \*\*\* producers, \*\*\*, reported producing WMMP and MDF MMP using the same machinery and/or employees.<sup>109</sup>

Furthermore, front-end production processes differ between MDF MMP and WMMP.<sup>110</sup> The production of MDF panels requires complex and capital-intensive facilities, costing \$100 million or more, and none of the material inputs or steps in MDF production is shared with the production of finger-jointed blanks.<sup>111</sup>

Back end production processes are similar for MDF MMP and WMMP, however, with some exceptions.<sup>112</sup> The process of molding MDF into MMP requires carbide blades that yield

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(...Continued)

Attachments C & D; Hearing Tr. at 19 (Brightbill), 38 (Procton), 47 (Trapp), 80 (Gartman), 143 (Emerson); Conference Tr. at 57, 60 (Procton), 61 (Gartman), 124 (Burke), 174 (Casey).

<sup>106</sup> CR/PR at Table G-1 (comments on manufacturing facilities, production processes and employees by \*\*\*); Petitioners' Prehearing Brief, Exhibit 1 at 15.

<sup>107</sup> CR/PR at Table I-7.

<sup>108</sup> CR/PR at Table I-8.

<sup>109</sup> CR/PR at Table I-8. \*\*\*. CR/PR at III-16 n.9, Table I-8; Petitioners' Prehearing Brief, Exhibit 1 at 16.

<sup>110</sup> CR/PR at Table G-1 (comments on manufacturing facilities, production processes and employees by \*\*\*); *see also* Hearing Tr. at 20 (Brightbill); Petitioners' Prehearing Brief, Exhibit 1 at 14-15.

<sup>111</sup> Petitioners' Prehearing Brief, Exhibit 1 at 15; CR/PR at Table G-1; *Compare* CR/PR at I-20-21 *with id.* at I-22 n.49.

<sup>112</sup> CR/PR at Table G-1 (comments on manufacturing facilities, production processes and employees by \*\*\*).

softer profiles than the steel blades used to mold WMMP, and can also require different molds and tooling than WMMP.<sup>113</sup>

Most responding domestic producers and purchasers and a majority of responding importers reported that WMMP is somewhat comparable to MDF MMP in terms of manufacturing facilities, production processes, and production employees.<sup>114</sup>

*Channels of Distribution.* Around \*\*\* of WMMP and \*\*\* MDF MMP is sold to distributors.<sup>115</sup> On the other hand, \*\*\* MDF MMP is sold to retailers and end users, which account for \*\*\* of WMMP sales.<sup>116</sup>

Most responding domestic producers, importers, and purchasers reported that WMMP is fully or mostly comparable to MDF MMP in terms of channels of distribution.<sup>117</sup>

*Interchangeability.* Although MDF MMP and WMMP are interchangeable in many decorative interior applications,<sup>118</sup> the physical limitations of MDF MMP preclude its substitution for WMMP in exterior applications and applications subject to moisture, and generally in structural applications and applications requiring small profiles. Such applications are estimated to account for a substantial portion of the WMMP market: Woodgrain estimates that MDF MMP was not substitutable with \*\*\* percent of the WMMP it produced in 2020, while Pacific Wood Laminates estimates that MDF MMP is not substitutable with \*\*\* percent of the LVL WMMP that it produces.<sup>119</sup> Unlike finger-jointed WMMP, MDF MMP is generally not interchangeable with the primary types of WMMP made from LVL, including door stiles, door frame components, and small profiles.<sup>120</sup>

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<sup>113</sup> CR/PR at I-22, Table G-1 (comments on manufacturing facilities, production processes and employees by \*\*\*); Petitioners' Prehearing Brief, Exhibit 1 at 15; ABIMCI's Prehearing Brief at 16; Hearing Tr. at 20 (Brightbill).

<sup>114</sup> CR/PR at Table I-7.

<sup>115</sup> CR/PR at Table I-10.

<sup>116</sup> CR/PR at Table I-10.

<sup>117</sup> CR/PR at Table I-7.

<sup>118</sup> See ABIMCI's Prehearing Brief at 15-16, Exhibit 1; CR/PR at Tables G-1-3; Conference Tr. at 116 (Ammons).

<sup>119</sup> Petitioners' Responses to Commissioner Questions at 24. An official for Metrie stated at the hearing that "75 percent of what we sell would be for interior application," and thus possibly suitable for either MDF MMP or WMMP. Hearing Tr. at 229 (Burke); ABIMCI's Responses to Commissioner Questions at 25-26. We would note, however, that Metrie did not fully participate in the final phase of the investigations; it did not submit a completed domestic producer's questionnaire response and submitted only a partial importers' questionnaire response. CR/PR at III-1 n.1, IV-1 n.2.

<sup>120</sup> Hearing Tr. at 80-81 (Easton).

Most responding domestic producers and purchasers and a plurality of responding importers reported that WMMP is somewhat comparable to MDF MMP in terms of interchangeability.<sup>121</sup>

*Producer and Customer Perceptions.* Numerous responding producers, importers, and purchasers commented that customers perceive MDF MMP as a less expensive and generally inferior substitute for WMMP in interior applications, and not as a substitute for WMMP in structural or exterior applications or applications subjected to moisture.<sup>122</sup> Such perceptions are consistent with the limitations on the uses of MDF MMP imposed by its physical characteristics.

Producers also generally perceive MDF MMP to be separate and distinct from WMMP. Two major domestic producers of both MDF MMP and WMMP, \*\*\*, have stated their belief that WMMP is “a separate and distinct market” from MDF MMP, consistent with the limited overlap between WMMP and MDF MMP production in the same facilities.<sup>123</sup> Similarly, at the hearing, an official from domestic producer Woodgrain testified that “{t}here’s a substantial difference between the two products today,” an official from domestic producer Endura testified “MDF is not in our market,” and an official from domestic producer Cascade testified that “we view MDF as a different product.”<sup>124</sup>

Most responding domestic producers and purchasers reported that WMMP is somewhat or never comparable to MDF MMP in terms of customer and producer perceptions, while a majority of responding importers reported that the two products are somewhat comparable in terms of the factor.<sup>125</sup>

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<sup>121</sup> CR/PR at Table I-7.

<sup>122</sup> See CR/PR at Tables G-1 (comments on producer and customer perceptions by \*\*\*), G-2 (comments on producer and customer perceptions by \*\*\*), G-3 (comments on producer and customer perceptions by \*\*\*); see also Hearing Tr. at 47 (Trapp); Conference Tr. at 57, 60 (Procton), 61 (Gartman), 116 (Ammons), 124 (Burke), 174 (Casey).

<sup>123</sup> Petitioners’ Prehearing Brief, Exhibit 1 at 11 (citing Petitioners’ Postconference Brief, Exhibit 1 at 25, Exhibits 15 and 16); CR/PR at Table G-1 (comments by \*\*\*)).

<sup>124</sup> Hearing Tr. at 38 (Procton), 47 (Trapp), 114 (Easton), 115 (Procton). While domestic producer of MDF MMP, MJB Wood Group, stated at the staff conference that it has produced finger-jointed WMMP on the same equipment and considers the products to be similar, \*\*\*. Conference Tr. at 100-1 (Caldwell); Domestic Producers’ Questionnaire Response of \*\*\*. Although an official from Metrie implied at the hearing that his company is a domestic producer of WMMP and MDF MMP, and considers the two products interchangeable, Metrie did not submit a completed domestic producers’ questionnaire. See Hearing Tr. at 152, 157-58 (Burke); CR/PR at III-1 n.1.

<sup>125</sup> CR/PR at Table I-7.

*Price.* MDF MMP prices are significantly lower than WMMP prices.<sup>126</sup> During the period of investigation, the average unit value of U.S. producers' U.S. shipments of MDF MMP was \*\*\* to \*\*\* percent lower than the average unit value of U.S. producers' shipments of WMMP.<sup>127</sup> One building publication estimated that MDF MMP crown mouldings cost nearly 20 percent less than equivalent finger-jointed WMMP crown mouldings, and responding importer \*\*\* commented that \*\*\*.<sup>128</sup>

All responding domestic producers and most responding importers and purchasers reported that WMMP is somewhat or never comparable to MDF MMP in terms of price.<sup>129</sup>

*Conclusion.* In its preliminary determinations, the Commission found sufficient differences between MDF MMP and WMMP, notwithstanding some similarities, to define the domestic like product to not include out-of-scope MDF MMP.<sup>130</sup>

On balance, we find the record of the final phase of the investigations continues to support finding sufficient differences between WMMP and out-of-scope MDF MMP to define the domestic like product to be coextensive with the scope of the investigations and not to include out-of-scope MDF MMP. We recognize that there are some similarities in terms of physical characteristics and uses; production processes; channels of distribution; interchangeability; and customer and producer perceptions. As discussed above, both WMMP and MDF MMP are made of or derived from wood that, when molded into the same shapes, may be used interchangeably in decorative interior applications,<sup>131</sup> are sold through similar channels of distribution, and are produced using similar back end processes, with some exceptions.<sup>132</sup> Customers view the products as interchangeable in many decorative interior applications.<sup>133</sup>

However, the differences between WMMP and out-of-scope MDF MMP in terms of physical characteristics and uses; manufacturing facilities, production processes, and production employees; interchangeability; producer and customer perceptions; and price

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<sup>126</sup> See CR/PR at Tables I-9, G-1-3; Conference Tr. at 116 (Ammons).

<sup>127</sup> CR/PR at Table I-9. We recognize that average unit value comparisons would be influenced by differences and changes in product mix, given the many different types of WMMP are sold at different price points. See, e.g., CR/PR at Table E-2.

<sup>128</sup> Petitioners' Postconference Brief, Exhibit 1 at 28, Exhibit 26; CR/PR at II-12, Table G-2.

<sup>129</sup> CR/PR at Table I-7.

<sup>130</sup> Preliminary Determinations, USITC Pub. 5030 at 17.

<sup>131</sup> See ABIMCI's Prehearing Brief at 8-9; CR/PR at Table G-3 ; Hearing Tr. at 158 (Burke), 164-65 (Ammons), 203 (Dixon); Conference Tr. at 101 (Caldwell), 115 (Ammons), 124, 215 (Burke).

<sup>132</sup> CR/PR at Tables I-10, G-1.

<sup>133</sup> See CR/PR at Tables G-1-3 (comments on producer and customer perceptions); Conference Tr. at 100-1 (Caldwell).

outweigh any similarities. MDF MMP are made of a different constituent material, medium density fiberboard, that renders MDF MMP more fragile and susceptible to moisture than WMMP.<sup>134</sup> These physical properties make MDF MMP unsuitable for exterior applications and applications subjected to high moisture, and generally unsuitable for structural applications and applications requiring small profiles – applications that account for a substantial portion of the WMMP market.<sup>135</sup> Furthermore, differences in the back-end production processes of MDF MMP and WMMP limit MDF MMP to softer profiles, which are not comparable to the more complex profiles possible with WMMP.<sup>136</sup> Consequently, the interchangeability of MDF MMP and WMMP is largely limited to a subset of interior decorative applications, and many customers perceive MDF MMP to be an inferior substitute for WMMP in such applications.<sup>137</sup>

Many producers also perceive MDF MMP to be separate and distinct from WMMP, including two major domestic producers of both MDF MMP and WMMP.<sup>138</sup> Indeed, MMP and WMMP are produced with different front-end processes and are generally produced in different facilities with different employees.<sup>139</sup> Most domestic producers produce either MDF MMP or WMMP, and those that produce both generally do so using separate equipment and/or employees.

Finally, the significantly lower prices of MDF MMP compared to WMMP, and the importance of price to purchasers, suggests that purchasers would generally prefer MDF MMP over WMMP if there were a high degree of interchangeability between the two products.<sup>140</sup> Yet, apparent U.S. consumption of WMMP increased during the period of investigation, and there is little evidence of any appreciable shift in consumer preferences from WMMP to MDF

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<sup>134</sup> See CR/PR at Tables G-1-3 (comments on physical characteristics and uses); Hearing Tr. at 19 (Brightbill), 38 (Procton), 47 (Trapp), 80 (Gartman); *see also* Conference Tr. at 57, 60 (Procton), 61 (Gartman), 124 (Burke), 174 (Casey).

<sup>135</sup> Petitioners' Prehearing Brief at 74 ; ABIMCI's Prehearing Brief at 10; Petitioners' Posthearing Brief at 22, Exhibit 14 ; Hearing Tr. at 19 (Brightbill), 38 (Procton), 47 (Trapp), 80 (Gartman), 143 (Emerson); Conference Tr. at 57, 60 (Procton), 61 (Gartman), 124 (Burke), 174 (Casey). *Compare* ABIMCI's Responses to Commissioner Questions at 26 , Attachments C & D.

<sup>136</sup> CR/PR at Table G-1 (comments on manufacturing facilities, production processes and employees by \*\*\*); Petitioners' Prehearing Brief, Exhibit 1 at 15.

<sup>137</sup> See CR/PR at Tables I-6, G-1 , G-2 , G-3; *see also* Hearing Tr. at 47 (Trapp); Conference Tr. at 57, 60 (Procton), 61 (Gartman), 116 (Ammons), 124 (Burke), 174 (Casey).

<sup>138</sup> Petitioners' Prehearing Brief, Exhibit 1 at 11 (citing Petitioners' Postconference Brief, Exhibit 1 at 25, Exhibits 15 and 16); CR/PR at Table G-1.

<sup>139</sup> CR/PR at Table I-8.

<sup>140</sup> See CR/PR at Tables I-9, II-7-8.

MMP during the period.<sup>141</sup> U.S. shipments of MDF MMP as a share of apparent U.S. consumption of MDF MMP and WMMP increased \*\*\* during the period of investigation, from \*\*\* percent in 2017 to \*\*\* percent in 2019 and \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019.<sup>142</sup> Increasing demand for WMMP notwithstanding their much higher prices is consistent with a more limited degree of interchangeability between WMMP and MDF MMP, as well as with other evidence that the two products differ in terms of physical characteristics and uses and producer and customer perceptions. Only \*\*\* to \*\*\* percent of responding purchasers reported that MDF MMP is fully or mostly comparable to WMMP in terms of characteristics and uses, interchangeability, and producer and customer perceptions, compared to the \*\*\* to \*\*\* percent of responding purchasers reporting that LVL WMMP is fully or mostly comparable to other WMMP in terms of these factors.<sup>143</sup>

On balance, based on the record, we find sufficient differences between MDF MMP and WMMP to draw a dividing line at the scope of the investigations, notwithstanding some similarities between MDF MMP and WMMP. Consequently, we define the domestic like product to not include out-of-scope MDF MMP.

In sum, we define the domestic like product as all WMMP, coextensive with the scope of the investigations.

### **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.”<sup>144</sup> In defining the domestic industry, the Commission’s general practice has been to include in the industry producers of all domestic production of the like product, whether toll-produced, captively consumed, or sold in the domestic merchant market.

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<sup>141</sup> CR/PR at Table IV-4; Hearing Tr. at 97-98 (Easton), 98 (Trapp); Domestic Producers’ Questionnaire Response of \*\*\* at Question IV-12; Conference Tr. at 57 (Procton, Easton); *see also* CR/PR at II-12 (most responding domestic producers, importers, and purchasers reported that changes in the price of MDF MMP do not affect the price of WMMP).

<sup>142</sup> Calculated from CR/PR at Tables C-1b and C-5b.

<sup>143</sup> CR/PR at Tables I-3, I-7.

<sup>144</sup> 19 U.S.C. § 1677(4)(A).



## **A. Sufficient Production-Related Activities**

The Commission must determine whether domestic producers producing WMMP from imported or purchased blanks engage in sufficient production-related activities to be considered domestic producers. In its preliminary determinations, the Commission found that they did.<sup>145</sup> In deciding whether a firm qualifies as a domestic producer of the domestic like product, the Commission generally analyzes the overall nature of a firm's U.S. production-related activities, although production-related activity at minimum levels could be insufficient to constitute domestic production.<sup>146</sup>

### **1. Arguments of the Parties**

Petitioners and the only respondent to address the issue, ABIMCI, agree that domestic producers that produce WMMP using imported or purchased blanks engage in sufficient production-related activities to be considered domestic producers, and should therefore be included in the domestic industry.<sup>147</sup>

### **2. Analysis**

Based on the record, we find that domestic producers producing WMMP from imported or purchased blanks engage in sufficient production-related activities to qualify as domestic producers.

*Capital investment.* Whether using internally produced, imported, or purchased blanks, domestic producers utilize the same back end operations to mold blanks into the desired profiles.<sup>148</sup> These operations include one or more molders, which grind and cut blanks into the desired shape; further complex end machining or processing, in some cases; and coating or

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<sup>145</sup> Preliminary Determinations, USITC Pub. 5030 at 19.

<sup>146</sup> The Commission generally considers six factors: (1) source and extent of the firm's capital investment; (2) technical expertise involved in U.S. production activities; (3) value added to the product in the United States; (4) employment levels; (5) quantity and type of parts sourced in the United States; and (6) any other costs and activities in the United States directly leading to production of the like product. No single factor is determinative and the Commission may consider any other factors it deems relevant in light of the specific facts of any investigation. *Crystalline Silica Photovoltaic Cells and Modules from China*, Inv. Nos. 701-TA-481 and 731-TA-1190 (Final), USITC Pub. 4360 at 12-13 (Nov. 2012).

<sup>147</sup> Petitioners' Prehearing Brief at 27, Exhibit 2; ABIMCI's Prehearing Brief at 22.

<sup>148</sup> CR/PR at I-20.

wrapping.<sup>149</sup> The machinery necessary to carry out these operations requires considerable capital investment, and responding domestic finishers reported capital investment of \$\*\*\* to \$\*\*\* during the 2017-19 period.<sup>150</sup>

*Technical expertise.* Due to the variety of machines and operations involved in domestic back-end finishing operations, for molding, machining, and coating, machine operators require a high degree of technical expertise. \*\*\*.<sup>151</sup> \*\*\*.<sup>152</sup> Most responding finishers rated the complexity of their finishing operations on the high end of a one to five scale, with five being most complex; \*\*\*.<sup>153</sup>

*Value added.* The record shows that the value added to WMMP in the United States by responding domestic finishers using purchased or imported blanks ranged from \*\*\* to \*\*\* percent during the 2017-19 period, which was \*\*\* lower than the value added by integrated producers using their own blanks during the period.<sup>154</sup>

*Employment.* Responding domestic finishers reported employment levels ranging from \*\*\* to \*\*\* production related workers during 2017-19, equivalent to around \*\*\* percent of the employment levels reported by responding integrated producers during the period.<sup>155</sup> Domestic finishers \*\*\* commented that the employees used to process imported or purchased blanks into WMMP are the same as the employees used to process internally produced blanks into WMMP.<sup>156</sup>

*Quantity and type of parts sourced in the United States.* Responding domestic finishers reported sourcing domestically produced blanks valued at \$\*\*\* to \$\*\*\* during the 2017-19 period.<sup>157</sup> \*\*\* of five responding domestic finishers, \*\*\*, sourced most or nearly all of their blanks domestically.<sup>158</sup>

*Conclusion.* The record shows that the production-related activities required to process imported or purchased blanks into WMMP are considerable. The domestic industry's back end operations require significant investment in a variety of machines, and employees with

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<sup>149</sup> CR/PR at I-20-21; Petitioners' Prehearing Brief, Exhibit 2 at 2-3; Conference Tr. at 89 (Easton).

<sup>150</sup> CR/PR at Table III-6.

<sup>151</sup> CR/PR at Table III-5.

<sup>152</sup> CR/PR at Table III-5.

<sup>153</sup> CR/PR at Table III-4.

<sup>154</sup> CR/PR at Table III-6. The value added in the United States by producers using their own blanks ranged from \*\*\* to \*\*\* percent during the 2017-19 period. *Id.*

<sup>155</sup> CR/PR at Table III-6.

<sup>156</sup> CR/PR at III-31 n.13, Table III-5.

<sup>157</sup> CR/PR at Table III-6.

<sup>158</sup> CR/PR at Table III-5; Domestic Producers' Questionnaire Responses of \*\*\* at Question V-1.

considerable technical expertise to operate them efficiently. The finishers' back end operations account for \*\*\* of the value added to their WMMP in the United States, which is significant, and require significant labor. \*\*\* of five responding finishers source most of the blanks used in their finishing operations domestically. Based on all of these factors, we find that domestic producers using imported or purchased blanks to produce WMMP engage in sufficient production-related activities to constitute domestic producers.

## B. Related Parties

We must determine whether any producer of the domestic like product should be excluded from the domestic industry pursuant to section 771(4)(B) of the Tariff Act. This provision allows the Commission, if appropriate circumstances exist, to exclude from the domestic industry producers that are related to an exporter or importer of subject merchandise or which are themselves importers.<sup>159</sup> Exclusion of such a producer is within the Commission's discretion based upon the facts presented in each investigation.<sup>160</sup>

\*\*\* are subject to the related party provision as importers of subject merchandise during the period of investigation.<sup>161</sup> Petitioners argue that the Commission should exclude \*\*\*

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<sup>159</sup> See *Torrington Co. v. United States*, 790 F. Supp. 1161, 1168 (Ct. Int'l Trade 1992), *aff'd without opinion*, 991 F.2d 809 (Fed. Cir. 1993); *Sandvik AB v. United States*, 721 F. Supp. 1322, 1331-32 (Ct. Int'l Trade 1989), *aff'd mem.*, 904 F.2d 46 (Fed. Cir. 1990); *Empire Plow Co. v. United States*, 675 F. Supp. 1348, 1352 (Ct. Int'l Trade 1987).

<sup>160</sup> The primary factors the Commission has examined in deciding whether appropriate circumstances exist to exclude a related party include the following:

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

<sup>161</sup> CR/PR at III-22, Tables III-2, III-16. \*\*\* domestic WMMP production operations are known as \*\*\*. *Id.* at Table III-16 note. Although \*\*\* also purchased subject imports from importers, we do not consider that any of these domestic producers control sufficient volumes of imports to qualify as a related party. *Id.* at Table III-17. The Commission has concluded that a domestic producer that does not itself import subject merchandise or does not share a corporate affiliation with an importer may nonetheless be deemed a related party if it controls large volumes of imports. The Commission has found such control to exist where the domestic producer was responsible for a predominant proportion (Continued...)

from the domestic industry under the related parties provision,<sup>162</sup> while respondent ABIMCI argues that the Commission should not exclude \*\*\*.<sup>163</sup> We find that appropriate circumstances exist to exclude \*\*\* but not \*\*\* from the domestic industry based on the following analysis.

\*\*\*. \*\*\* was the \*\*\* largest domestic producer in 2019, accounting for \*\*\* percent of domestic industry production.<sup>164</sup> It is subject to the related party provision because it imported subject WMMP from China \*\*\*.<sup>165</sup> Specifically, \*\*\* imported \*\*\* board feet in 2017 (the equivalent of \*\*\* percent of its domestic production), \*\*\* board feet in 2018 (the equivalent of \*\*\* percent of its domestic production), and \*\*\* board feet in 2019 (the equivalent of \*\*\* percent of its domestic production).<sup>166</sup> It imported \*\*\* board feet in interim 2020 (the equivalent to \*\*\* percent of its domestic production) compared to \*\*\* board feet in interim 2019 (the equivalent of \*\*\* percent of its domestic production).<sup>167</sup> \*\*\* has stated that it imports WMMP from China in order to “\*\*\*\*.”<sup>168</sup> \*\*\* the petitions.<sup>169</sup>

The record shows that \*\*\* primary interest is in domestic production rather than importation. In this regard, \*\*\* states that it imported subject merchandise \*\*\*.<sup>170</sup> Indeed, \*\*\*.<sup>171</sup> While the ratio of its subject imports to domestic production increased during the

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(...Continued)

of an importer’s purchases and the importer’s purchases were substantial. \*\*\* purchased only small volumes of subject imports during the period of investigation, with annual volumes ranging from \*\*\* to \*\*\* board feet for \*\*\* and from \*\*\* to \*\*\* board feet for \*\*\*. *Id.* We therefore find that neither \*\*\* nor \*\*\* qualify as a related parties because the volumes of their respective subject import purchases were not substantial; thus, even if their purchases accounted for a predominant proportion of an importer’s purchases, the importer’s purchases would not be substantial.

\*\*\*, including \*\*\* board feet in 2017, \*\*\* board feet in 2018, \*\*\* board feet in 2019, and \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.* Although the volumes of \*\*\* purchases were large, these purchases declined as a share of \*\*\* imports of WMMP from China during the period of investigation, from \*\*\* percent in 2017 to \*\*\* percent in 2018, \*\*\* percent in 2019, and \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. CR/PR at Table III-17; Importers’ Questionnaire Response of \*\*\* at Question II-8a. Although \*\*\*. Importers’ Questionnaire Response of \*\*\* at Question III-22. Because \*\*\* purchases from \*\*\* did not account for a predominant proportion of \*\*\* imports of WMMP from China, we find that \*\*\* does not qualify as a related party.

<sup>162</sup> Petitioners’ Prehearing Brief at 29-30.

<sup>163</sup> ABIMCI’s Prehearing Brief at 22.

<sup>164</sup> CR/PR at Table III-1.

<sup>165</sup> CR/PR at III-22, Table III-16.

<sup>166</sup> CR/PR at Table III-16.

<sup>167</sup> CR/PR at Table III-16.

<sup>168</sup> CR/PR at Table III-16.

<sup>169</sup> CR/PR at Table III-1.

<sup>170</sup> CR/PR at Table III-16.

<sup>171</sup> CR/PR at Tables III-3, VI-10.

period of investigation, \*\*\*, its subject imports remained below its domestic production and its ratio of imports to domestic production was lower in interim 2020 compared to interim 2019.<sup>172</sup> There is also no evidence that its domestic production operations benefitted from its subject imports. For these reasons, we find that appropriate circumstances do not exist to exclude \*\*\* from the domestic industry under the related party provision.

\*\*\*. \*\*\* was the \*\*\* largest domestic finisher in 2019, accounting for \*\*\* percent of domestic production by finishers that year.<sup>173</sup> It falls under the related party provision because it imported subject WMMP from China \*\*\*.<sup>174</sup> Specifically, \*\*\* imported \*\*\* board feet in 2017 (the equivalent of \*\*\* percent of its domestic production), \*\*\* board feet in 2018 (the equivalent of \*\*\* percent of its domestic production), and \*\*\* board feet in 2019 (the equivalent of \*\*\* percent of its domestic production).<sup>175</sup> It imported \*\*\* board feet in interim 2020 (equivalent to \*\*\* percent of its domestic production) compared to \*\*\* board feet in interim 2019 (the equivalent of \*\*\* percent of its domestic production).<sup>176</sup> \*\*\* has stated that it imports WMMP from China because \*\*\*.<sup>177</sup> \*\*\* the petitions.<sup>178</sup>

The record shows that \*\*\* primary interest is in importation rather than domestic production. In this regard, \*\*\* ratio of subject imports to domestic production was \*\*\*, while its domestic production remained \*\*\*.<sup>179</sup> Although \*\*\*.<sup>180</sup> For these reasons, we find that appropriate circumstances exist to exclude \*\*\* from the domestic industry under the related party provision.

In sum, we find that appropriate circumstances exist to exclude \*\*\* from the domestic industry under the related party provision, but not \*\*\*. Accordingly, based on our definition of the domestic like product, we define the domestic industry to include all domestic producers of WMMP, with the exception of \*\*\*.

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<sup>172</sup> CR/PR at Tables III-3, III-16.

<sup>173</sup> CR/PR at Table III-1. \*\*\* is primarily a finisher and \*\*\*. See Domestic Producers' Questionnaire Response of \*\*\* at Question II-7. The value of \*\*\* total net sales accounted for only \*\*\* percent of the industry's total net sales value in 2019. Calculated from Domestic Producers' Questionnaire Response of \*\*\* at Questions III-9a and V-6 and CR/PR at Table C-1b.

<sup>174</sup> CR/PR at Table III-16.

<sup>175</sup> CR/PR at Table III-16.

<sup>176</sup> CR/PR at Table III-16.

<sup>177</sup> CR/PR at Table III-16.

<sup>178</sup> CR/PR at Table III-1.

<sup>179</sup> CR/PR at Table III-16.

<sup>180</sup> CR/PR at Tables III-3, III-7-8.

#### **IV. Material Injury by Reason of Subject Imports<sup>181</sup>**

Based on the record in the final phase of the investigations, we find that an industry in the United States is materially injured by reason of imports of WMMP from China that Commerce has found to be sold in the United States at LTFV and subsidized by the Government of China.

##### **A. Legal Standards**

In the final phase of antidumping and countervailing duty investigations, the Commission determines whether an industry in the United States is materially injured or threatened with material injury by reason of the imports under investigation.<sup>182</sup> In making this determination, the Commission must consider the volume of subject imports, their effect on prices for the domestic like product, and their impact on domestic producers of the domestic like product, but only in the context of U.S. production operations.<sup>183</sup> The statute defines “material injury” as “harm which is not inconsequential, immaterial, or unimportant.”<sup>184</sup> 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.<sup>185</sup> No single factor is dispositive, and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>186</sup>

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<sup>181</sup> Pursuant to Section 771(24) of the Tariff Act, imports from a subject country of merchandise corresponding to a domestic like product that account for less than 3 percent of all such merchandise imported into the United States during the most recent 12 months for which data are available preceding the filing of the petition shall be deemed negligible. 19 U.S.C. §§ 1671b(a), 1673b(a), 1677(24)(A)(i), 1677(24)(B).

During the most recent 12-month period preceding the filing of the petitions, January-December 2019, subject imports from China accounted for 29.8 percent of total imports. CR/PR at Table IV-3. The subject imports from China are the same for both the antidumping and countervailing duty investigations. Because subject imports from China were well above the statutory negligibility threshold, we find that such imports are not negligible.

<sup>182</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>183</sup> 19 U.S.C. § 1677(7)(B). The Commission “may consider such other economic factors as are relevant to the determination” but shall “identify each {such} factor ... and explain in full its relevance to the determination.” 19 U.S.C. § 1677(7)(B).

<sup>184</sup> 19 U.S.C. § 1677(7)(A).

<sup>185</sup> 19 U.S.C. § 1677(7)(C)(iii).

<sup>186</sup> 19 U.S.C. § 1677(7)(C)(iii).

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,<sup>187</sup> it does not define the phrase “by reason of,” indicating that this aspect of the injury analysis is left to the Commission’s reasonable exercise of its discretion.<sup>188</sup> 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.<sup>189</sup>

In many investigations, there are other economic factors at work, some or all of which may also be having adverse effects on the domestic industry. Such economic factors might include nonsubject imports; changes in technology, demand, or consumer tastes; competition among domestic producers; or management decisions by domestic producers. The legislative history explains that the Commission must examine factors other than subject imports to ensure that it is not attributing injury from other factors to the subject imports, thereby inflating an otherwise tangential cause of injury into one that satisfies the statutory material injury threshold.<sup>190</sup> In performing its examination, however, the Commission need not isolate

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<sup>187</sup> 19 U.S.C. §§ 1671d(b), 1673d(b).

<sup>188</sup> *Angus Chemical Co. v. United States*, 140 F.3d 1478, 1484-85 (Fed. Cir. 1998) (“{T}he statute does not ‘compel the commissioners’ to employ {a particular methodology}.”), *aff’g*, 944 F. Supp. 943, 951 (Ct. Int’l Trade 1996).

<sup>189</sup> The Federal Circuit, in addressing the causation standard of the statute, observed that “{a}s long as its effects are not merely incidental, tangential, or trivial, the foreign product sold at less than fair value meets the causation requirement.” *Nippon Steel Corp. v. USITC*, 345 F.3d 1379, 1384 (Fed. Cir. 2003). This was further ratified in *Mittal Steel Point Lisas Ltd. v. United States*, 542 F.3d 867, 873 (Fed. Cir. 2008), where the Federal Circuit, quoting *Gerald Metals, Inc. v. United States*, 132 F.3d 716, 722 (Fed. Cir. 1997), stated that “this court requires evidence in the record ‘to show that the harm occurred ‘by reason of’ the LTFV imports, not by reason of a minimal or tangential contribution to material harm caused by LTFV goods.’” *See also Nippon Steel Corp. v. United States*, 458 F.3d 1345, 1357 (Fed. Cir. 2006); *Taiwan Semiconductor Industry Ass’n v. USITC*, 266 F.3d 1339, 1345 (Fed. Cir. 2001).

<sup>190</sup> SAA at 851-52 (“{T}he Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.”); S. Rep. 96-249 at 75 (1979) (the Commission “will consider information which indicates that harm is caused by factors other than less-than-fair-value imports.”); H.R. Rep. 96-317 at 47 (1979) (“in examining the overall injury being experienced by a domestic industry, the ITC will take into account evidence presented to it which demonstrates that the harm attributed by the petitioner to the subsidized or dumped imports is attributable to such other factors;” those factors include “the volume and prices of nonsubsidized imports or imports sold at fair value, contraction in demand or changes in patterns of consumption, (Continued...)

the injury caused by other factors from injury caused by unfairly traded imports.<sup>191</sup> 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.<sup>192</sup> It is clear that the existence of injury caused by other factors does not compel a negative determination.<sup>193</sup>

Assessment of whether material injury to the domestic industry is “by reason of” subject imports “does not require the Commission to address the causation issue in any particular way” as long as “the injury to the domestic industry can reasonably be attributed to the subject imports.”<sup>194</sup> The Commission ensures that it has “evidence in the record” to “show that the harm occurred ‘by reason of’ the LTFV imports,” and that it is “not attributing injury from other

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(...Continued)

trade restrictive practices of and competition between the foreign and domestic producers, developments in technology and the export performance and productivity of the domestic industry”); accord *Mittal Steel*, 542 F.3d at 877.

<sup>191</sup> SAA at 851-52 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports.”); *Taiwan Semiconductor Industry Ass’n*, 266 F.3d at 1345 (“{T}he Commission need not isolate the injury caused by other factors from injury caused by unfair imports ... . Rather, the Commission must examine other factors to ensure that it is not attributing injury from other sources to the subject imports.” (emphasis in original)); *Asociacion de Productores de Salmon y Trucha de Chile AG v. United States*, 180 F. Supp. 2d 1360, 1375 (Ct. Int’l Trade 2002) (“{t}he Commission is not required to isolate the effects of subject imports from other factors contributing to injury” or make “bright-line distinctions” between the effects of subject imports and other causes.); see also *Softwood Lumber from Canada*, Inv. Nos. 701-TA-414 and 731-TA-928 (Remand), USITC Pub. 3658 at 100-01 (Dec. 2003) (Commission recognized that “{i}f an alleged other factor is found not to have or threaten to have injurious effects to the domestic industry, *i.e.*, it is not an ‘other causal factor,’ then there is nothing to further examine regarding attribution to injury”), citing *Gerald Metals*, 132 F.3d at 722 (the statute “does not suggest that an importer of LTFV goods can escape countervailing duties by finding some tangential or minor cause unrelated to the LTFV goods that contributed to the harmful effects on domestic market prices.”).

<sup>192</sup> S. Rep. 96-249 at 74-75; H.R. Rep. 96-317 at 47.

<sup>193</sup> See *Nippon Steel Corp.*, 345 F.3d at 1381 (“an affirmative material-injury determination under the statute requires no more than a substantial-factor showing. That is, the ‘dumping’ need not be the sole or principal cause of injury.”).

<sup>194</sup> *Mittal Steel*, 542 F.3d at 876 & 78; see also *id.* at 873 (“While the Commission may not enter an affirmative determination unless it finds that a domestic industry is materially injured ‘by reason of’ subject imports, the Commission is not required to follow a single methodology for making that determination ... {and has} broad discretion with respect to its choice of methodology.”) citing *United States Steel Group v. United States*, 96 F.3d 1352, 1362 (Fed. Cir. 1996) and S. Rep. 96-249 at 75. In its decision in *Swiff-Train v. United States*, 793 F.3d 1355 (Fed. Cir. 2015), the Federal Circuit affirmed the Commission’s causation analysis as comporting with the Court’s guidance in *Mittal*.



sources to the subject imports.”<sup>195</sup> The Federal Circuit has examined and affirmed various Commission methodologies and has disavowed “rigid adherence to a specific formula.”<sup>196</sup>

The question of whether the material injury threshold for subject imports is satisfied notwithstanding any injury from other factors is factual, subject to review under the substantial evidence standard.<sup>197</sup> Congress has delegated this factual finding to the Commission because of the agency’s institutional expertise in resolving injury issues.<sup>198</sup>

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

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

### **1. Demand Considerations**

All WMMP are molded to the same shapes defined by a standard industry “pattern book,” with different shapes corresponding to different applications.<sup>199</sup> As most WMMP is used in residential construction, demand for WMMP is driven by housing construction and remodeling activity, which increased during the POI.<sup>200</sup> Demand for WMMP was higher in interim 2020 than in interim 2019 because the COVID-19 pandemic spurred increased home remodeling activity.<sup>201</sup>

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<sup>195</sup> *Mittal Steel*, 542 F.3d at 873 (quoting from *Gerald Metals*, 132 F.3d at 722), 877-79. We note that one relevant “other factor” may involve the presence of significant volumes of price-competitive nonsubject imports in the U.S. market, particularly when a commodity product is at issue. In appropriate cases, the Commission collects information regarding nonsubject imports and producers in nonsubject countries in order to conduct its analysis.

<sup>196</sup> *Nucor Corp. v. United States*, 414 F.3d 1331, 1336, 1341 (Fed. Cir. 2005); *see also Mittal Steel*, 542 F.3d at 879 (“*Bratsk* did not read into the antidumping statute a Procrustean formula for determining whether a domestic injury was ‘by reason’ of subject imports.”).

<sup>197</sup> We provide in our discussion below a full analysis of other factors alleged to have caused any material injury experienced by the domestic industry.

<sup>198</sup> *Mittal Steel*, 542 F.3d at 873; *Nippon Steel Corp.*, 458 F.3d at 1350, *citing U.S. Steel Group*, 96 F.3d at 1357; S. Rep. 96-249 at 75 (“The determination of the ITC with respect to causation is ... complex and difficult, and is a matter for the judgment of the ITC.”).

<sup>199</sup> CR/PR at I-13 & n.27; Petitioners’ Prehearing Brief at 33.

<sup>200</sup> CR/PR at II-13, Figure II-1.

<sup>201</sup> CR/PR at II-16; Hearing Tr. at 9 (El-Saabawi), 11 (Emerson), 28 (Carroll), 32 (Easton), 146 (Emerson), 158-59 (Burke), 164 (Ammons).

Apparent U.S. consumption of WMMP increased 4.0 percent between 2017 and 2019, from 976.0 million board feet in 2017 to 1.0 billion board feet in 2018 and 2019.<sup>202</sup> Apparent U.S. consumption was higher in interim 2020, at 504.1 million board feet, than in interim 2019, when it was 488.6 million board feet.<sup>203</sup> The vast majority of responding domestic producers, importers, and purchasers reported that U.S. demand for WMMP increased during the period of investigation.<sup>204</sup>

## 2. Supply Considerations

Nonsubject imports were the largest source of WMMP in the U.S. market during the POI, accounting for 57.6 percent of apparent U.S. consumption in 2019, followed by subject imports (24.8 percent of apparent U.S. consumption) and the domestic industry (\*\*\* percent of apparent U.S. consumption).<sup>205</sup> The largest country sources of nonsubject imports were Brazil, Chile, and Mexico.<sup>206</sup>

Several responding domestic producers reported changes to their operations during the period of investigation. Three domestic producers reported plant closings, eight domestic producers reported production shutdowns and/or curtailments, and four domestic producers reported consolidations.<sup>207</sup> In particular, \*\*\* reported closing its \*\*\* production facility in \*\*\* due to \*\*\* and \*\*\*.<sup>208</sup> Two domestic producers reported opening new production facilities, including \*\*\*.<sup>209</sup>

## 3. Substitutability and Other Conditions

We find that there is at least a moderate to high degree of substitutability between subject imports and the domestic like product for comparable types of WMMP.<sup>210</sup> The vast majority of responding domestic producers and a majority of importers and purchasers reported that subject imports are always or frequently interchangeable with domestically

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<sup>202</sup> CR/PR at Tables IV-4, C-1b.

<sup>203</sup> CR/PR at Tables IV-4, C-1b.

<sup>204</sup> CR/PR at Table II-4.

<sup>205</sup> CR/PR at Table C-1b.

<sup>206</sup> CR/PR at IV-4.

<sup>207</sup> CR/PR at III-4, Table III-3.

<sup>208</sup> CR/PR at III-4, Table III-3.

<sup>209</sup> CR/PR at Tables III-3, VI-10.

<sup>210</sup> See CR/PR at II-16.

produced WMMP.<sup>211</sup> Most responding purchasers reported that domestically produced WMMP, like subject imports, meets minimum quality specifications always or usually.<sup>212</sup> Further, most responding purchasers rated domestically produced WMMP as comparable to subject imports with respect to 14 of 19 purchasing factors, including availability and quality; superior to subject imports with respect to delivery time; and inferior to subject imports with respect to only four purchasing factors, including gesso coating and price.<sup>213</sup> During the period of investigation, domestically-produced WMMP and subject imports were sold through the same three channels of distribution, to distributors, retailers, and end users; made of the same constituent materials, primarily pine but also hardwoods; and made into the same types of WMMP, mostly door frames/jambs, door/window casings, trim (excluding S1S2E), base boards, and other.<sup>214</sup>

We further find that price is an important factor in purchasing decisions for WMMP, although quality is also important. Thirty-eight of 46 responding purchasers identified price as a very important factor, and more responding purchasers ranked price as among their top three purchasing factors (40) than any other factor but quality (44).<sup>215</sup> Moreover, the vast majority of responding producers (13 of 15), nearly half of responding importers (15 of 32), and a significant number of responding purchasers (13 of 36) reported that differences other than

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<sup>211</sup> CR/PR at Table II-11.

<sup>212</sup> CR/PR at Table II-12.

<sup>213</sup> CR/PR at Table II-10a. Differences between domestically produced WMMP and subject imports in terms of gesso coatings and the availability of LVL WMMP did not serve to limit their substitutability to an appreciable degree. Although a greater proportion of subject imports than domestically produced WMMP was offered with an extruded gesso coating, most responding purchasers rated such coatings as only “somewhat” or “not” important and only \*\*\* responding purchaser ranked gesso coating among its top three purchasing factors. CR/PR at II-18 n.30 (\*\*\* percent of subject imports were offered with a gesso coating), II-23 n.35, Tables II-7, note, II-8. \*\*\*.” Declaration of \*\*\*, appended as Exhibit 2 to Petitioners’ Posthearing Brief, at ¶15, Attachment 1. Furthermore, \*\*\* percent of domestic industry shipments possessed such coatings in 2019. *Id.* at II-18 n.30.

Nor did the greater availability of LVL WMMP from subject sources, according to respondents and some responding purchasers, serve to limit the substitutability of domestically produced WMMP and subject imports. *See* CR/PR at II-27, V-30, Tables III-17, V-13; *see also* Masonite’s Prehearing Brief at 10-12; JELD-WEN’s Prehearing Brief at 6-10; JELD-WEN’s Posthearing Brief at 9; Hearing Tr. at 184-85 (Dixon). As discussed in section II.D.1 above, LVL WMMP is interchangeable with other WMMP in most applications, although LVL WMMP is preferred in certain structural applications. Furthermore, \*\*\*, the only responding domestic producer to report production of LVL WMMP, reported the ability to supply \*\*\* additional volumes of LVL WMMP throughout the period of investigation, with a capacity utilization rate ranging from \*\*\* to \*\*\* percent. *Id.* at Table III-7.

<sup>214</sup> CR/PR at Tables II-1, IV-5, IV-6.

<sup>215</sup> Petitioners’ Prehearing Brief at 43-44; CR/PR at Tables II-7-8.

price are only sometimes or never important.<sup>216</sup> Numerous domestic producer witnesses stated at the hearing and conference that competition with subject imports is price based,<sup>217</sup> consistent with communications between domestic producers and purchasers \*\*\* in which the purchasers referenced the lower prices of subject imports.<sup>218</sup> Given that most responding purchasers reported that domestically produced WMMP is comparable to subject imports in terms of most non-price factors, differences in price would be an important factor for purchasers choosing between domestic and subject WMMP.<sup>219</sup>

We find a similar degree of substitutability between nonsubject imports and the domestic like product as between subject imports and the domestic like product for comparable types of WMMP. The vast majority of responding domestic producers and a majority of importers and purchasers reported that nonsubject imports are always or frequently interchangeable with domestically produced WMMP.<sup>220</sup> Most responding purchasers also reported that nonsubject imports always or usually meet minimum quality specifications,<sup>221</sup> and rated domestically produced WMMP as comparable to nonsubject imports with respect to most purchasing factors.<sup>222</sup>

Most responding producers, importers, and purchasers reported that there are substitutes for WMMP, including MDF MMP, PVC, and composites, depending on the application.<sup>223</sup> As discussed in section II.D.2 above, MDF MMP may be substituted for WMMP in many interior decorative applications but not in exterior or high moisture applications, and not in structural or small profile applications. PVC and composites are typically more expensive than WMMP and used mostly in exterior applications.<sup>224</sup>

The cost of lumber, which was the domestic industry's principal raw material, increased from January 2017 through June 2018, declined or remained stable through February 2020, and

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<sup>216</sup> CR/PR at Table II-13.

<sup>217</sup> Hearing Tr. at 58, 71 (Procton), 71 (Trapp); *see also* Conference Tr. at 34 (Easton), 38 (Procton), 72 (Easton), 73 (Trapp).

<sup>218</sup> Petitioners' Posthearing Brief at 5; Declaration of \*\*\*, attached as Exhibit 2 to Petitioners' Posthearing Brief, at ¶7, Attachment 3; Declaration of \*\*\*, attached as Exhibit 5 to Petitioners' Posthearing Brief, at ¶¶3-5, Attachments A-C. Petitioners also provided correspondence between domestic producers and purchaser \*\*\* in which the purchaser referenced the lower price of imports, without specifying the source. Petitioners' Posthearing Brief at Exhibits 6-7.

<sup>219</sup> CR/PR at Table II-10a.

<sup>220</sup> CR/PR at Table II-11.

<sup>221</sup> CR/PR at Table II-12.

<sup>222</sup> CR/PR at Table II-10a.

<sup>223</sup> CR/PR at II-12.

<sup>224</sup> CR/PR at II-13 & n.27.

then increased substantially through the end of the period of investigation to the highest level of the period.<sup>225</sup> Most responding domestic producers reported that raw material prices fluctuated since January 1, 2017.<sup>226</sup> Raw materials as a share of the domestic industry's total cost of goods sold ("COGS") declined from \*\*\* percent in 2017 to \*\*\* percent in 2019 and was \*\*\* percent in interim 2020.<sup>227</sup>

### C. Volume of Subject Imports

Section 771(7)(C)(i) of the Tariff Act provides that the "Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant."<sup>228</sup>

We find that subject import volume and the increase in subject import volume were significant in absolute terms and relative to consumption in the United States.<sup>229</sup> Subject

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<sup>225</sup> See CR/PR at V-1, Figure V-1.

<sup>226</sup> CR/PR at V-2. Ten responding domestic producers reported that raw material costs had fluctuated, five reported that raw material costs had increased, and one reported that raw material costs had declined. *Id.*

<sup>227</sup> Calculated from CR/PR at Table C-1b and Domestic Producers' Response of \*\*\*.

<sup>228</sup> 19 U.S.C. § 1677(7)(C)(i).

<sup>229</sup> In a final phase investigation, the statute requires the Commission to consider whether changes in the volume, price effects, or impact of subject imports are related to the pendency of the investigation. 19 U.S.C. § 1677(7)(I). If the Commission determines that such changes are related to the pendency of the investigation, it has the discretion under the statute to reduce the weight accorded to such information. *Id.* In these investigations, petitioners argue that the filing of the petitions on January 8, 2020 resulted in lower subject import U.S. shipments and market share in interim 2020 compared to interim 2019. Petitioners' Prehearing Brief at 49-50; Petitioners' Posthearing Brief at 6-7; CR/PR at Table C-1b. ABIMCI contends that the filing of the petitions had no effect on subject import volume, which was higher in interim 2020 than in interim 2019. ABIMCI's Posthearing Brief at 11; Hearing Tr. at 177 (Dougan); CR/PR at Table IV-9.

We find that both the lower level of U.S. shipments of subject imports in interim 2020 compared to interim 2019 (1.0 percent), and the lower subject import market share comparing the periods (1.0 percentage points), were related to the pendency of the investigations. CR/PR at Table C-1b. Although the declines began in 2019, the rate of the decline accelerated in interim 2020, after the filing of the petitions, and the domestic industry regained market share from subject imports only in interim 2020. *Id.* Both hearing testimony and documentary evidence provided by petitioners indicates that the filing of the petitions significantly contributed to these trends. See Hearing Tr. at 88-89 (Easton), 89 (Trapp), 89-90 (Gartman), 90-91 (Procton); Petitioners' Posthearing Brief at 12, Exhibits 12, 13, 21, 25, 26, 28. The higher subject import volume in interim 2020 compared to interim 2019 does not detract from the lower subject import U.S. shipments and market share between the periods, which directly contributed to the domestic industry's improved performance. See CR/PR at Tables IV-9, C-1b. Having found that (Continued...)

import volume increased from 193.6 million board feet in 2017 to 257.5 million board feet in 2018 before declining to 249.9 million board feet in 2019, a level 29.1 percent higher than in 2017.<sup>230</sup> U.S. shipments of subject imports increased from 203.1 million board feet in 2017 to 252.3 million board feet in 2018 before declining slightly to 251.7 million board feet in 2019, a level 23.9 percent higher than in 2017.<sup>231</sup> U.S. shipments of subject imports as a share of apparent U.S. consumption increased from 20.8 percent in 2017 to 25.2 percent in 2018 before declining to 24.8 percent in 2019, a level 4.0 percentage points higher than in 2017.<sup>232</sup>

We conclude that the volume of subject imports and the increase in that volume are significant both in absolute terms and relative to consumption in the United States.

#### **D. Price Effects of the Subject Imports**

Section 771(7)(C)(ii) of the Tariff Act provides that, in evaluating the price effects of 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.<sup>233</sup>

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(...Continued)

the change in subject import U.S. shipments and market share since the filing of the petitions was related to the pendency of the investigations, we attach reduced weight to this data in interim 2020.

<sup>230</sup> CR/PR at Table IV-2. Subject import volume was 125.6 million board feet in interim 2020, up from 116.0 million board feet in interim 2019. *Id.*

<sup>231</sup> CR/PR at Tables IV-4, C-1b. U.S. shipments of subject imports were 117.9 million board feet in interim 2020, down from 119.2 million board feet in interim 2019. *Id.*

<sup>232</sup> CR/PR at Table C-1b. U.S. shipments of subject imports as a share of apparent U.S. consumption were lower in interim 2020, at 23.4 percent, than in interim 2019, at 24.4 percent. *Id.* We also note that the increase in subject import market share between 2017 and 2019 was at the direct expense of the domestic industry, which lost \*\*\* percentage points of market share over that period. *Id.*

<sup>233</sup> 19 U.S.C. § 1677(7)(C)(ii).

As addressed in section IV.B.3 above, the record indicates that there is at least a moderate to high degree of substitutability between cumulated subject imports and the domestic like product for comparable types of WMMP and that price is an important consideration in purchasing decisions.

Seven domestic producers and 13 importers provided usable quarterly net U.S. f.o.b. selling price data for seven WMMP products, although not all firms reported pricing for all products for all quarters.<sup>234</sup> Reported pricing data accounted for approximately \*\*\* percent of the value of the domestic industry's U.S. shipments of WMMP and \*\*\* percent of the value of U.S. shipments of subject imports from China.<sup>235</sup>

Based on these pricing data, we find that there has been significant price underselling by subject imports compared with the price of the domestic like product during the period of investigation.<sup>236</sup> Subject imports undersold the domestic like product in 53 of 84 quarterly comparisons, or 63.1 percent of quarterly comparisons, at margins averaging \*\*\* percent for products 1-3 and \*\*\* percent for products 4-6.<sup>237</sup> Quarters in which subject imports undersold the domestic like product accounted for \*\*\* percent of reported subject import sales volume for products 1-3 and \*\*\* percent of reported subject import sales volume for products 4-6.<sup>238</sup>

As referenced above, subject import market share increased 4.0 percentage points from 2017 to 2019, and this increase in subject import market share was at the direct expense of the

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<sup>234</sup> CR/PR at V-9. CR/PR at V-9. \*\*\*, which we have excluded from the domestic industry under the related party provision, reported no pricing data. Product 1 was defined as "Finger-jointed lineal trim, made of pine/fir, with dimensions of 9/16" x 5-1/4", WM-618, primed or coated." CR/PR at V-5. Product 2 was defined as "Finger-jointed lineal trim, made of pine/fir, 5/8" x 2-1/4", LWM-366, primed or coated." *Id.* Product 3 was defined as "Finger-jointed lineal trim, made of pine/fir, 11/16" x 11/16" x 16' WM-106, primed or coated." *Id.* Product 4 was defined as "Jamb: Exterior door frame nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dadoes for threshold and head attachment, primed or coated." *Id.* Product 5 was defined as "Jamb: Exterior door frame nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 6-9/16" width x nominal 7' long and machined with end dadoes for threshold and head attachment, primed or coated." *Id.* Product 6 was defined as "Brick moulding: Casing that attaches to exterior edge of door frame nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated." *Id.* Product 7 was defined as "LVL 11/16" x 11/16" quarter-round." *Id.* There was no domestic price data reported for product 7. *Id.* at V-24. Pricing products 1-3 and 7 were collected in lineal board feet. Pricing products 4-6 were collected in number of units. *Id.* at V-8, n.12.

<sup>235</sup> CR/PR at V-9.

<sup>236</sup> CR/PR at Table V-11.

<sup>237</sup> CR/PR at Table V-11. Petitioners claim that subject import \*\*\* for product 5 resulted from \*\*\*. Petitioners' Final Comments at 7.

<sup>238</sup> CR/PR at Table V-11.

domestic industry, which lost \*\*\* percentage points of market share over the period.<sup>239</sup> Based on the moderate to high degree of substitutability between subject imports and the domestic like product and the importance of price in purchasing decisions, we find that the significant underselling by subject imports caused the shift in market share from the domestic industry to subject imports during the period of investigation.<sup>240</sup> In addition, we observe that responding purchasers reduced the domestic industry's share of their purchases by 5.7 percentage points between 2017 and 2019 while increasing the subject import share of their purchases by 3.3 percentage points over the period.<sup>241</sup> When asked whether subject import prices were lower than domestic prices, 22 of 26 purchasers reported yes.<sup>242</sup> Thirteen responding purchasers reported that price was a primary reason they purchased a total of 54.2 million board feet of subject imports instead of domestic product during the period of investigation.<sup>243</sup> Consistent with the large volume of confirmed lost sales, officials from domestic producers testified at the hearing that their firms lost sales to subject imports due to price.<sup>244</sup>

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<sup>239</sup> CR/PR at Table C-1b. Subject imports lost 1.0 percentage points of market share, and the domestic industry gained \*\*\* percentage points of market share, in interim 2020 compared to interim 2019. *Id.*

<sup>240</sup> CR/PR at Table C-1b.

<sup>241</sup> CR/PR at Table V-12.

<sup>242</sup> CR/PR at Table V-13.

<sup>243</sup> CR/PR at Table V-13. We note that the volume of purchases switched is understated because \*\*\* responding purchasers, including large purchasers \*\*\*, reported switching from domestically produced WMMP to subject imports due to price but did not report the volume switched. *See id.* at II-3 n.10, Tables V-12-13. Aggregated apparent U.S. consumption during the POI totaled approximately 3.5 billion board feet. *Id.* at Table C-1b.

We are unpersuaded by ABIMCI's argument that the Commission should exclude the lost sales reported by responding purchaser \*\*\*, as well as by responding purchasers \*\*\*, for various reasons. ABIMCI's Prehearing Brief at 57-58. Under the circumstances, it was not inappropriate for \*\*\*, a purchaser of WMMP during the period of investigation, to complete a purchasers' questionnaire response. *See Purchasers' Questionnaire Response of \*\*\* at Question II-1. \*\*\*."* Hearing Tr. at \*\*\*). \*\*\*) *Id.* at \*\*\*). \*\*\*) *Purchasers' Questionnaire Response of \*\*\* at Question II-2.* Thus, the record shows that \*\*\*. We therefore consider the lost sales reported by \*\*\*.

We also consider the lost sales reported by purchasers \*\*\*. Although ABIMCI highlights seeming inconsistencies in the responses of these purchasers, *see ABIMCI's Prehearing Brief at 57-58*, each purchaser reported purchasing subject imports instead of domestically produced WMMP with price as a primary reason. *See CR/PR at Tables V-12-13.* Given the clarity of the questionnaire instructions and absence of contrary evidence, we do not view the alleged inconsistencies in these purchasers' responses as sufficient to invalidate them.

<sup>244</sup> *See Hearing Tr. at 21 (Carroll), 44 (Trapp), 57 (MacDonald), 58, 70 (Trapp), 75 (MacDonald), 86, 101 (Trapp).*



We have considered price trends during the period of investigation. Between the first quarter of 2017 and the second quarter of 2020, domestic producer sales prices increased with respect to products 1-4, were flat with respect to product 5, and declined \*\*\* percent with respect to product 6.<sup>245</sup> During the same period, importer sales prices increased for products 1-2 and 4-7 imported from China, but declined \*\*\* percent with respect to product 3 imported from China.<sup>246</sup>

We have also considered whether subject imports prevented price increases which would otherwise have occurred. A majority of responding domestic producers, seven of thirteen, reported having to roll back announced price increases, and representatives of domestic producers Cascade and Woodgrain testified at the hearing that their firms had to forego price increases to compete with low-priced subject imports.<sup>247</sup> The industry's ratio of COGS to net sales increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 before declining to \*\*\* percent in 2019, a level \*\*\* percent higher than in 2017.<sup>248</sup> On the basis of these data and conditions of competition in this market, we cannot conclude that subject imports prevented price increases that otherwise would have occurred to a significant degree.<sup>249</sup>

Significant underselling by subject imports caused a shift in market share from the domestic industry to subject imports during the period of investigation. We consequently find,

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<sup>245</sup> CR/PR at Table V-10. Between the first and last quarters of the period of investigation, domestic producer prices increased by \*\*\* percent on sales of product 1, \*\*\* percent on sales of product 2, \*\*\* percent on sales of product 3, and \*\*\* percent on sales of product 4. *Id.*

Prices for lumber, the primary input for WMMP, generally increased from January 2017 through June 2018 then either decreased or remained stable through February 2020. *Id.* at V-1, Figure V-1. Beginning in March/April 2020, prices increased substantially until September 2020, then decreased in October-November 2020. *Id.*

<sup>246</sup> CR/PR at Table V-10.

<sup>247</sup> CR/PR at V-28; Hearing Tr. at 100-1 (Easton), 101 (Trapp); *see also* Domestic Producers' Questionnaire Response of \*\*\* at Question IV-24; Domestic Producers' Questionnaire Responses of \*\*\* at Question IV-17; Conference Tr. at 39 (Procton), 45, 77 (Trapp, Easton), 78 (Carroll). We recognize that in referencing "subject imports," the representative of Woodgrain meant subject imports from China and imports of WMMP from Brazil, the latter of which were subject imports at the time but became nonsubject after Commerce made a negative final determination with respect to Brazil. \*\*\* . *See* CR/PR at Table V-12.

<sup>248</sup> CR/PR at Table C-1b. The industry's ratio of COGS to net sales was \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

<sup>249</sup> Commissioner Schmidlein agrees that she cannot conclude subject imports prevented price increases that otherwise would have occurred to a significant degree, and specifically notes the presence of large volume of nonsubject imports in the market that were generally priced lower than subject imports.

based on the record of the final phase of these investigations, that subject imports had significant price effects.

#### **E. Impact of the Subject Imports<sup>250</sup>**

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.”<sup>251</sup> These factors include output, sales, inventories, capacity utilization, market share, employment, wages, productivity, gross profits, net profits, operating profits, cash flow, return on investment, return on capital, ability to raise capital, ability to service debts, research and development, and factors affecting domestic prices. No single factor is dispositive and all relevant factors are considered “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>252</sup>

During the period of investigation, the increase in apparent U.S. consumption should have resulted in strengthening domestic industry performance. Apparent U.S. consumption increased 4.0 percent between 2017 and 2019 and was 3.2 percent higher in interim 2020 compared to interim 2019.<sup>253</sup> Instead, as subject imports captured 4.0 percentage points of

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<sup>250</sup> 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 amended final determination of sales at LTFV, Commerce found dumping margins of 45.49 to 231.60 percent for imports from China. *Wood Mouldings and Millwork Products From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value*, 86 Fed. Reg. 62 (Jan. 4, 2020), as amended in Memorandum, *Final Determination of Sales at Less-Than-Fair-Value: Wood Mouldings and Millwork Products from the People's Republic of China: Ministerial Error Allegations* (Jan. 11, 2021) at 3. We take into account in our analysis the fact that Commerce has made final findings that all subject producers in China are selling subject imports in the United States at LTFV. In addition to this consideration, our impact analysis has considered other factors affecting domestic prices. Our analysis of the significant underselling and 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.

<sup>251</sup> 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.”).

<sup>252</sup> 19 U.S.C. § 1677(7)(C)(iii). This provision was amended by the Trade Preferences Extension Act of 2015, Pub. L. 114-27.

<sup>253</sup> CR/PR at Tables IV-4, C-1b.

market share from the domestic industry between 2017 and 2019, the domestic industry's operating and financial performance declined by nearly all measures.<sup>254</sup>

The domestic industry's capacity, production, and rate of capacity utilization declined between 2017 and 2019.<sup>255</sup> Specifically, the industry's capacity declined from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019, a level \*\*\* percent lower than in 2017.<sup>256</sup> The industry's production declined from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019, a level \*\*\* percent lower than in 2017.<sup>257</sup> As the domestic

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<sup>254</sup> CR/PR at Table C-1b. As discussed in section IV.C above, if the Commission determines that a change in the impact of subject imports is related to the pendency of the investigation, it has the discretion under the statute to reduce the weight accorded to such information. 19 U.S.C. § 1677(7)(I). Petitioners argue that the filing of the petitions on January 8, 2020, enabled the domestic industry to regain sales and market share lost to subject imports, resulting in a slight improvement in the industry's performance. See Petitioners' Prehearing Brief at 49-52; Petitioners' Posthearing Brief at 6-7. Respondent ABIMCI argues that the domestic industry's improved performance in interim 2020 resulted from increased demand as the COVID-19 pandemic spurred home renovations, not from the filing of the petitions. ABIMCI's Posthearing Brief at 10-11.

We find that the domestic industry's improved performance in interim 2020 relative to interim 2019 was at least in part related to the pendency of the investigations. As discussed in section IV.C above, the domestic industry's market share was \*\*\* percentage points higher in interim 2020 relative to interim 2019, largely due to the lower subject import market share (by 1.0 percentage points) between the periods. CR/PR at Table C-1b. At the hearing, officials from domestic producers Cascade, Endura, Sierra Pacific, and Woodgrain testified that the filing of the petitions resulted in increases in their sales in interim 2020. Hearing Tr. at 88-89 (Easton), 89 (Trapp), 89-90 (Gartman), 90-91 (Procton). Petitioners also provided documentary evidence that customers returned to purchasing from the domestic industry after the filing of the petitions. Petitioners' Posthearing Brief at 12, Exhibits 12, 13, 21, 25, 26, 28. Thus, the record shows that the filing of the petitions spurred a shift in market share from subject imports to the domestic industry that contributed to the domestic industry's stronger performance in interim 2020 relative to interim 2019. Because this change in the impact of subject imports was related to the pendency of the investigation, we attach reduced weight to data concerning the domestic industry's performance in interim 2020.

<sup>255</sup> Because all U.S. finishers were also integrated producers of WMMP and purchased domestically produced and/or imported blanks for finishing into WMMP, CR/PR at III-1, we must consider certain measures of the U.S. finishers' performance separately to avoid double counting. See CR/PR at Table C-1b. We address these measures for integrated domestic producers in the text because such producers accounted for the vast majority of domestic industry production during the period of investigation. Compare CR/PR at Table III-7 to *id.* at Table III-8.

<sup>256</sup> CR/PR at Table C-1b. The industry's capacity was \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

U.S. finishers' capacity increased from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019. *Id.* It was \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

<sup>257</sup> CR/PR at Table C-1b. The industry's production was \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

(Continued...)

industry's production declined at a faster rate than its capacity, the industry's rate of capacity utilization declined from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019, a level \*\*\* percentage points lower than in 2017.<sup>258</sup>

Consistent with the domestic industry's declining production, the industry's employment indicators declined between 2017 and 2019. Between 2017 and 2019, the domestic industry's number of production related workers ("PRWs") declined by \*\*\* percent, its hours worked declined by \*\*\* percent, and its wages paid declined by \*\*\* percent.<sup>259</sup> The industry's productivity in board feet per hour also declined \*\*\* percent during the period.<sup>260</sup>

The domestic industry also experienced a decline in its U.S. shipments and market share. The domestic industry's U.S. shipments declined from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019, a level \*\*\* percent lower than in 2017.<sup>261</sup> The industry's share of apparent U.S. consumption declined from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019, a level \*\*\* percentage points lower than in 2017.<sup>262</sup>

The domestic industry's end-of-period inventories increased irregularly between 2017 and 2019. Specifically, the industry's end-of-period inventories declined from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 before increasing to \*\*\* board feet in 2019, a level \*\*\* percent

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(...Continued)

U.S. finishers' production increased from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019. *Id.* It was \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

<sup>258</sup> CR/PR at Table C-1b. The industry's rate of capacity utilization was \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

U.S. finishers' rate of capacity utilization declined from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019. *Id.* It was \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

<sup>259</sup> CR/PR at Table C-1b. Comparing interim 2020 to interim 2019, the industry's number of PRWs was \*\*\* percent lower and its hours worked were \*\*\* percent lower, but its wages paid were \*\*\* percent higher. *Id.*

<sup>260</sup> CR/PR at Table C-1b. We note that the industry's productivity is measured in board feet per hour, not dollars as mistakenly indicated in table C-1b. *See id.* at Table III-18. The industry's productivity was \*\*\* percent higher in interim 2020 compared to interim 2019. *Id.* at Table C-1b.

U.S. finishers' productivity increased \*\*\* percent between 2017 and 2019, but was \*\*\* percent lower in interim 2020 compared to interim 2019. *Id.*

<sup>261</sup> CR/PR at Table C-1b. The industry's U.S. shipments were \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

<sup>262</sup> CR/PR at Table C-1b. The industry's share of apparent U.S. consumption was \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

higher than in 2017.<sup>263</sup> The industry's end-of-period inventories as a share of total shipments increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019.<sup>264</sup>

The domestic industry's net sales revenues declined each year and its profitability declined \*\*\* between 2017 and 2018 before improving in 2019 to a level below that in 2017. The industry's net sales value declined from \$\*\*\* in 2017 to \$\*\*\* in 2018 and \$\*\*\* in 2019, a level \*\*\* percent lower than in 2017.<sup>265</sup> The industry's operating income declined from \$\*\*\* in 2017 to a loss of negative \$\*\*\* in 2018 before improving to a loss of \$\*\*\* in 2019.<sup>266</sup> Similarly, the industry's operating income margin declined from \*\*\* percent in 2017 to negative \*\*\* percent in 2018 before improving to negative \*\*\* percent in 2019.<sup>267</sup> The domestic industry's average operating return on assets declined from \*\*\* percent in 2017 to negative \*\*\* percent in 2018 before increasing to negative \*\*\* percent in 2019.<sup>268</sup> The domestic industry's capital expenditures declined irregularly between 2017 and 2019 while its research & development

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<sup>263</sup> CR/PR at Table C-1b. The industry's end-of-period inventories were \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

U.S. finishers' end-of-period inventories increased from \*\*\* board feet in 2017 to \*\*\* board feet in 2018 and \*\*\* board feet in 2019. *Id.* They were \*\*\* board feet in interim 2020, compared to \*\*\* board feet in interim 2019. *Id.*

<sup>264</sup> CR/PR at Table C-1b. The industry's end-of-period inventories as a share of total shipments were \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

U.S. finishers' end-of-period inventories as a share of total shipments increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 and \*\*\* percent in 2019. *Id.* The share was \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. *Id.*

<sup>265</sup> CR/PR at Table C-1b. The industry's net sales value was \$\*\*\* in interim 2020, compared to \$\*\*\* in interim 2019. *Id.*

<sup>266</sup> CR/PR at Table C-1b. The industry's operating income was \$\*\*\* in interim 2020, compared to an operating loss of \$\*\*\* in interim 2019.

<sup>267</sup> CR/PR at Table C-1b. The industry's operating income margin was \*\*\* percent in interim 2020, compared to negative \*\*\* percent in interim 2019. *Id.*

The domestic industry's gross profit and net income also declined irregularly between 2017 and 2019. The industry's gross profit declined from \$\*\*\* in 2017 to \$\*\*\* in 2018 before increasing to \$\*\*\* in 2019, and was \$\*\*\* in interim 2020, compared to \$\*\*\* in interim 2019. *Id.* The industry's net income declined from \$\*\*\* in 2017 to negative \$\*\*\* in 2018 before increasing to negative \$\*\*\* in 2019, and was \$\*\*\* in interim 2020, compared to negative \$\*\*\* in interim 2019. *Id.* The industry's net income as a share of net sales declined from \*\*\* percent in 2017 to negative \*\*\* percent in 2018 before improving to negative \*\*\* percent in 2019, and was \*\*\* percent in interim 2020, compared to negative \*\*\* percent in interim 2019. *Id.* The industry's cash flow declined from \$\*\*\* in 2017 to negative \$\*\*\* in 2018 before increasing to \$\*\*\* in 2019, a level \*\*\* percent lower than in 2017. Calculated from CR/PR at Table C-1b and Domestic Producers' Questionnaire Response of \*\*\*. The industry's cash flow was \$\*\*\* in interim 2020, compared to \$\*\*\* in interim 2019. *Id.*

<sup>268</sup> Calculated from CR/PR at Tables VI-7 and C-1b.

("R&D") expenses increased irregularly during the period.<sup>269</sup> Eleven (of 15) responding domestic producers reported that subject imports had negative effects on their investment and ten responding domestic producers reported that subject imports had negative effects on their growth and development.<sup>270</sup>

The domestic industry's declining performance resulted in plant closures, production curtailments, and layoffs. Specifically, \*\*\* reported closing plants; \*\*\* reported production curtailments; and \*\*\* reported layoffs, resulting in \*\*\* fewer PRWs in 2019 than in 2017.<sup>271</sup> Endura lost its largest frame customer, \*\*\*, to subject imports and closed the production facility reliant on the customer, and \*\*\*.<sup>272</sup>

The record of the final phase investigations indicates that there is a causal nexus between subject imports and the domestic industry's declining performance between 2017 and 2019. Subject import volume and market share increased significantly between 2017 and 2018 and remained elevated in 2019 at the direct expense of the domestic industry. Low prices enabled subject imports to capture 4.0 percentage points of market share from the domestic industry over the period. Due to subject imports, the domestic industry was unable to capitalize on the 4.0 percent increase in apparent U.S. consumption between 2017 and 2019, and instead suffered declining performance according to most measures during the period.<sup>273</sup> The domestic industry's financial performance correlated with trends in subject import market share, declining \*\*\* between 2017 and 2018 as subject import market share increased to a period high, and improving \*\*\* between 2018 and 2019, to a level that remained below that in 2017, as subject import market share declined slightly to a still elevated level.<sup>274</sup>

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<sup>269</sup> CR/PR at Table C-1b. The domestic industry's capital expenditures increased from \$\*\*\* in 2017 to \$\*\*\* in 2018 but declined to \$\*\*\* in 2019, a level \*\*\* percent lower than in 2017. *Id.* The industry's capital expenditures were \$\*\*\* in interim 2020, compared to \$\*\*\* in interim 2019. *Id.* The industry's R&D expenses increased from \$\*\*\* in 2017 to \$\*\*\* in 2018 and 2019. *Id.* The industry's R&D expenses were \$\*\*\* in interim 2020, compared to \$\*\*\* in interim 2019. *Id.*

<sup>270</sup> CR/PR at Table VI-12.

<sup>271</sup> CR/PR at Tables III-3, C-1b.

<sup>272</sup> CR/PR at Tables III-3; Conference Tr. at 39-40 (Proctor) (stating "we were forced to cease operations at our Sparta, Tennessee, plant in 2018" after being "informed by our largest frame customer they were discontinuing their business with us, business which accounted for over 70 percent of this plant's production, and would otherwise source product from a competitor whose product originated in China"); Petitioners' Prehearing Brief at 63-64.

<sup>273</sup> CR/PR at Table C-1b.

<sup>274</sup> CR/PR at Table C-1b. We note that there is no clear correlation between the domestic industry's financial performance and apparent U.S. consumption trends, unlike the correlation between the effect of subject import trends and the industry's financial performance. Apparent U.S. consumption increased far more between 2017 and 2018 (2.5 percent), when the industry's financial (Continued...)

We have also considered whether there are other factors that may have had an adverse impact on the domestic industry during the period of investigation to ensure that we are not attributing injury from such other factors to the subject imports.

We recognize that nonsubject imports, which accounted for over half of apparent U.S. consumption, may have contributed to the domestic industry's declining performance between 2017 and 2019.<sup>275</sup> Like subject imports, nonsubject imports increased over the period,<sup>276</sup> and were priced lower than the domestic like product in most quarterly comparisons.<sup>277</sup> However, subject imports were the fastest growing source of WMMP in the U.S. market between 2017 and 2019, with subject import volume increasing 29.1 percent and U.S. shipments of subject imports increasing 23.9 percent over the period.<sup>278</sup> Between 2017 and 2019, low-priced subject imports captured 4.0 percentage points of market share from the domestic industry, nearly \*\*\* the market share captured by nonsubject imports.<sup>279</sup> Furthermore, unlike with subject imports, there is no clear correlation between nonsubject import market share trends and the domestic

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(...Continued)

performance declined, than between 2018 and 2019 (1.5 percent), when the industry's financial performance improved \*\*\*. *Id.*

<sup>275</sup> CR/PR at Table C-1b.

<sup>276</sup> Between 2017 and 2019, nonsubject import volume increased 10.6 percent, from 532.8 million board feet in 2017 to 589.5 million board feet in 2019, and U.S. shipments of nonsubject imports increased 8.3 percent, from 540.0 million board feet in 2017 to 584.7 million board feet in 2019. CR/PR at Table IV-2. Nonsubject import volume was 275.1 million board feet in interim 2020, compared to 290.6 million board feet in interim 2019. *Id.* at Table IV-2. U.S. shipments of nonsubject imports were 288.5 million board feet in interim 2020, compared to 280.9 million board feet in interim 2019. *Id.* at Table C-1b. Nonsubject imports also increased irregularly as a share of apparent U.S. consumption, declining from 55.3 percent in 2017 to 54.4 percent in 2018 before increasing to 57.6 percent in 2019, a level 2.3 percentage points higher than in 2017. *Id.* at Table IV-7. Nonsubject import market share was 57.2 percent in interim 2020, compared to 57.5 percent in interim 2019. *Id.*

<sup>277</sup> Nonsubject imports from Brazil and Chile were priced lower than the domestic like product in 138 of 168 quarterly comparisons, or 82.1 percent of comparisons, with quarters of lower prices accounting for \*\*\* percent of reported Brazilian and Chilean import sales volume for products 1-3 and \*\*\* percent of reported Brazilian and Chilean import sales volume for products 4-6. See CR/PR at D-17, Tables D-7a, D-7b. Importers of WMMP from Chile and Brazil reported sales price data on the same seven pricing products on which domestic producers and importers of WMMP from China reported sales price data. *Id.* at D-3. Twenty-one importers reported price data from Brazil, and six importers reported price data for Chile for products 1-6 but none reported sales of product 7. *Id.* Pricing data reported by these firms accounted for approximately 10.2 percent of the value of U.S. commercial shipments of imports from Brazil in 2019, and 14.5 percent of the value of U.S. commercial shipments of imports from Chile in 2019. *Id.*

<sup>278</sup> CR/PR at Tables IV-2-3. U.S. shipments of subject imports rose by 48.6 million board feet while U.S. shipments of nonsubject imports rose by 44.7 million board feet. See *id.* at Table IV-4

<sup>279</sup> CR/PR at Table C-1b.

industry's financial performance, which declined between 2017 and 2018 as nonsubject import market share declined and improved \*\*\* between 2018 and 2019 as nonsubject import market share increased to a period high.<sup>280</sup> While we acknowledge that nonsubject imports increased and gained market share at the expense of the domestic industry, this does not sever the causal link between subject imports and the domestic industry's declining performance.

We find that capacity constraints did not account for the domestic industry's declining performance between 2017 and 2019. Respondents argue that the domestic industry was incapable of supplying sufficient quantities of WMMP during the period of investigation notwithstanding the unused capacity reported by many producers.<sup>281</sup> Almost all responding purchasers reporting a change in the availability of domestically produced WMMP during the period of investigation reported that supplies were tight due to increased demand, limited imports, and little available domestic capacity,<sup>282</sup> and three responding purchasers reported specific supply difficulties with domestic producers.<sup>283</sup> Notwithstanding the availability problems reported by responding purchasers, particularly in interim 2020 as purchasers returned to domestic producers after the filing of the petitions, the record shows that the domestic industry possessed ample unused capacity during the 2017-19 period with which it could have increased production and U.S. shipments.<sup>284</sup> With a capacity utilization rate of only \*\*\* percent in 2019, the domestic industry possessed unused capacity of \*\*\* board feet, equivalent to \*\*\* percent of apparent U.S. consumption that year.<sup>285</sup> The domestic industry demonstrated its ability to more fully utilize its capacity in 2017, when its production was \*\*\* board feet or \*\*\* percent higher than in 2019.<sup>286</sup> Furthermore, a majority of responding purchasers reported that domestically produced WMMP was superior or comparable to subject

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<sup>280</sup> CR/PR at Table C-1b.

<sup>281</sup> See ABIMCI's Prehearing Brief at 29; Masonite's Prehearing Brief at 10-12; ; JELD-WEN's Prehearing Brief at 6-10; JELD-WEN's Posthearing Brief at 9; JELD-WEN's Prehearing Brief at 6-10; JELD-WEN's Posthearing Brief at 9.

<sup>282</sup> CR/PR at II-10.

<sup>283</sup> Purchasers' Questionnaire Responses of \*\*\* at Question III-12. Specifically, \*\*\*. *Id.*

<sup>284</sup> Commission staff verified the accuracy of the domestic producers' questionnaire response submitted by Woodgrain, which accounted for \*\*\* percent of the domestic industry's reported capacity in 2019. See Verification Report, December 11, 2020 (EDIS Document No. 729659); CR/PR at Tables III-7, C-1b.

<sup>285</sup> CR/PR at Table C-1b. U.S. finishers possessed unused capacity of \*\*\* board feet in 2019. *Id.*

<sup>286</sup> CR/PR at Table C-1b. We note that the domestic industry's production and U.S. shipments could have been \*\*\* board feet higher in 2019 but for the 4.0 percentage points of market share lost to subject imports. *Id.*



imports in terms of availability (18 of 30) and reliability of supply (21 of 30).<sup>287</sup> We find that the domestic industry could have produced and shipped significantly higher volumes of WMMP in 2019 but for subject imports.

We also find that the availability of substitute products, including MMP made from MDF, PVC, and composites, does not explain the domestic industry's declining performance between 2017 and 2019. Competition from substitute products did not prevent apparent U.S. consumption of WMMP from increasing 4.0 percent during the period.<sup>288</sup> As discussed in section II.D.2 above, the limited interchangeability of MDF MMP and WMMP, largely confined to interior decorative applications, is reflected in the absence of any shift from WMMP to MDF MMP during the period of investigation, despite the lower price of MDF MMP. U.S. shipments of MDF MMP as a share of apparent U.S. consumption of MDF MMP and WMMP increased \*\*\* during the period of investigation.<sup>289</sup> Nor is there any evidence that MMP made from PVC or composites, which are more expensive than WMMP and confined to external applications, affected WMMP demand or prices during the period of investigation.<sup>290</sup> Most responding producers, importers, and purchasers reported that changes in the prices of MMP made from MDF, PVC, and composites did not affect the price of WMMP.<sup>291</sup>

We are unpersuaded by ABIMCI's argument that \*\*\* explains the domestic industry's declining operating income margins between 2017 and 2019.<sup>292</sup> \*\*\*.<sup>293</sup> For this reason, \*\*\*.<sup>294</sup> Thus, the record does not support ABICMI's claim that \*\*\* financial data for 2019 reflect only \*\*\* and should therefore be adjusted.<sup>295</sup>

Even accepting that \*\*\*, we have found that the domestic industry's performance declined between 2017 and 2019 by nearly every measure, not just operating income

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<sup>287</sup> CR/PR at Table II-10a.

<sup>288</sup> CR/PR at Table C-1b.

<sup>289</sup> Calculated from CR/PR at Tables C-1b and C-5b.

<sup>290</sup> CR/PR at II-13.

<sup>291</sup> CR/PR at II-12-13.

<sup>292</sup> ABIMCI's Prehearing Brief at 63-64; CR/PR at Tables III-3, VI-5; Domestic Producers' Questionnaire Response of \*\*\* at II-7.

<sup>293</sup> CR/PR at Table III-3; Domestic Producers' Questionnaire Response of \*\*\* at Questions I-2a and III-12b.

<sup>294</sup> CR/PR at Table VI-5; Domestic Producers' Questionnaire Response of \*\*\* at Question III-10. We note that \*\*\*. CR/PR at Table III-16. \*\*\*. *Id.*

<sup>295</sup> We reject ABIMCI's argument that \*\*\* would somehow yield a more accurate picture of the domestic industry's financial performance. See ABIMCI's Prehearing Brief at 64; ABIMCI's Posthearing Brief at 10. We fail to see how ABIMCI's proposed methodology would yield a reasonable estimate of \*\*\*. See CR/PR at Table VI-5. Indeed, \*\*\*. See *id.*

margins.<sup>296</sup> Although the domestic industry excluding \*\*\* narrowed its operating loss as a share of net sales from negative \*\*\* percent in 2017 to negative \*\*\* percent in 2019, the operating income of these producers remained negative in 2019 and much weaker than if the domestic industry had not lost \*\*\* percentage points of market share to subject imports.<sup>297</sup> Furthermore, the performance of the domestic industry excluding \*\*\* declined by most other measures between 2017 and 2019 despite increasing demand.<sup>298</sup> Even if it were appropriate to \*\*\*, we would find that \*\*\* does not sever the causal link between subject imports and the domestic industry's declining performance between 2017 and 2019.

We are also unpersuaded by ABIMCI's argument that the domestic industry's declining financial performance between 2017 and 2019 resulted from \*\*\*,<sup>299</sup> \*\*\*,<sup>300</sup> \*\*\*,<sup>301</sup> \*\*\*,<sup>302</sup> We therefore rely on \*\*\*.

Finally, we find that differences between subject imports and the domestic like product in terms of quality, gesso coatings, and the availability of LVL WMMP did not significantly attenuate subject import competition. We recognize that some purchasers favor subject imports for reasons of quality and availability, and that a greater proportion of subject imports than domestic WMMP possessed a gesso coating.<sup>303</sup> As discussed in section IV.3.B, however, the record shows that domestically produced WMMP is generally comparable to subject imports in terms of quality, and that differences between domestically produced WMMP and subject imports in terms of gesso coatings and the availability of LVL WMMP did not serve to limit their substitutability to an appreciable degree.<sup>304</sup> LVL WMMP accounted for a small share

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<sup>296</sup> See CR/PR at Table C-1b.

<sup>297</sup> Calculated from CR/PR at Table C-1b and Domestic Producers' Questionnaire of \*\*\*.

<sup>298</sup> Between 2017 and 2019, the domestic industry excluding \*\*\* experienced a \*\*\* percent decline in capacity, a \*\*\* percent decline in production, a \*\*\* percentage point decline in capacity utilization, a \*\*\* percent decline in production-related workers, a \*\*\* percent decline in U.S. shipments, a \*\*\* percentage point decline in market share, a \*\*\* percent decline in net sales revenues, and a \*\*\* percent decline in capital expenditures. Calculated from CR/PR at Table C-1b and Domestic Producers' Questionnaire Response of \*\*\*.

<sup>299</sup> ABIMCI's Prehearing Brief at 72-73.

<sup>300</sup> Domestic Producers' Questionnaire Response of \*\*\* at Question III-7a.

<sup>301</sup> According to \*\*\* See \*\*\* (EDIS Document No. 723612).

<sup>302</sup> See \*\*\* (EDIS Document No. 723612).

<sup>303</sup> See CR/PR at II-18-19 & n.30, 22, Tables II-10a (most purchasers reported that domestic WMMP is inferior to subject imports in terms of gesso coating). We note that while an official from importer Metrie testified that his firm switched purchases from domestic product to subject imports for reasons of quality, Hearing Tr. at 155 (Burke), \*\*\*, CR/PR at II-12-13 n.25.

<sup>304</sup> Most responding purchasers rated domestically produced WMMP as comparable or superior to subject imports with respect to quality meets industry standards (21 of 29) and quality exceeds (Continued...)

of apparent U.S. consumption of WMMP during the 2017-19 period, less than \*\*\* percent,<sup>305</sup> and the sole domestic producer of LVL WMMP reported \*\*\*.<sup>306</sup> The domestic industry also produced substantial volumes of WMMP with an extruded gesso coating, accounting for \*\*\* percent of domestic industry shipments in 2019, and most responding purchasers reported that such coatings were only somewhat or not important to their purchasing decisions.<sup>307</sup> Indeed, \*\*\*.<sup>308</sup>

In sum, based on the record of the final phase of these investigations, we conclude that subject imports had a significant impact on the domestic industry.

## V. Conclusion

For the reasons stated above, we determine that an industry in the United States is materially injured by reason of subject imports of WMMP from China that are sold in the United States at LTFV and subsidized by the government of China.

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(...Continued)

industry standards (16 of 28). CR/PR at Table II-10a. Most responding purchasers, 27 of 40, also reported that domestically produced WMMP always or usually meets minimum quality specifications. *Id.* at Table II-12.

<sup>305</sup> LVL WMMP as a share of apparent U.S. consumption of WMMP increased from \*\*\* percent in 2017 to \*\*\* percent in 2018 and to \*\*\* percent in 2019. Calculated from CR/PR at Tables C-1b and C-4.

<sup>306</sup> CR/PR at Table III-7.

<sup>307</sup> CR/PR at II-18 n.30, Tables II-7 & note, II-8. Only one responding purchaser ranked gesso coating among its top three purchasing factors. *Id.* at Table II-7 & note.

<sup>308</sup> Declaration of \*\*\*, appended as Exhibit 2 to Petitioners' Posthearing Brief, at ¶15, Attachment 1.



# Part I: Introduction

## Background

These investigations result from petitions filed with the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“USITC” or “Commission”) by the Coalition of American Millwork Producers,<sup>1</sup> on January 8, 2020, alleging that an industry in the United States is materially injured and threatened with material injury by reason of subsidized imports of wood mouldings and millwork products (“WMMP” or “wood mouldings”)<sup>2</sup> from China and less-than-fair-value (“LTFV”) imports of WMMP from Brazil and China. On January 4, 2021, Commerce determined that imports of WMMP from Brazil are not being, or are not likely to be, sold in the United States at LTFV. Subsequently, the Commission terminated its investigation with respect to imports of WMMP from Brazil.<sup>3</sup> The following tabulation provides information relating to the background of these investigations.<sup>4 5</sup>

Effective date	Action
January 8, 2020	Petitions filed with Commerce and the Commission; institution of Commission investigations (85 FR 2438, January 15, 2020)
January 28, 2020	Commerce’s notice of initiation of AD and CVD investigations (85 FR 6502 and 85 FR 6513, February 5, 2020)
February 24, 2020	Commission’s preliminary determinations (85 FR 11391, February 27, 2020)
June 12, 2020	Commerce’s preliminary CVD determination and alignment of final determination with final AD determination (85 FR 35900, June 12, 2020)

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<sup>1</sup> When the petitions were filed, the Coalition of American Millwork Producers comprised of Bright Wood Corporation, Madras, Oregon; Cascade Wood Products, Inc., White City, Oregon; Endura Products, Inc., Colfax, North Carolina; Sierra Pacific Industries, Red Bluff, California; Sunset Moulding, Live Oak, California; Woodgrain Millwork Inc., Fruitland, Idaho; and Yuba River Moulding, Yuba City, California. During the final phase of the investigations, Best Moulding Corporation, Albuquerque, New Mexico; Menzner Lumber and Supply Company, Marathon, Wisconsin; and Pacific Wood Laminates, Brookings, Oregon, joined the Coalition of American Millwork Producers.

<sup>2</sup> See the section entitled “The subject merchandise” in Part I of this report for a complete description of the merchandise subject in this proceeding.

<sup>3</sup> 86 FR 70, January 4, 2021; and 86 FR 1522, January 8, 2021.

<sup>4</sup> Pertinent *Federal Register* notices are referenced in appendix A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>5</sup> Appendix B presents the witnesses who appeared at the Commission’s hearing.

<b>Effective date</b>	<b>Action</b>
August 12, 2020	Commerce's preliminary AD determinations (85 FR 48667 and 48669, August 12, 2020); scheduling of final phase of Commission investigations (85 FR 54593, September 2, 2020)
December 22, 2020	Commission's hearing
January 4, 2021	Commerce's final affirmative AD and CVD determinations regarding China (86 FR 63 and 86 FR 67, January 4, 2021)
January 4, 2021	Commerce's final negative AD determination regarding Brazil (86 FR 70, January 4, 2021); and termination of Commission investigation regarding Brazil (86 FR 1522, January 8, 2021)
January 22, 2021	Commission's vote
February 10, 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--<sup>6</sup>

*In evaluating the volume of imports of merchandise, the Commission shall consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States is significant. . . In evaluating the effect of imports of such merchandise on prices, the Commission shall consider whether. . . (I) there has been significant price underselling by the 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*

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<sup>6</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

*under subparagraph (B)(i)(III), the Commission shall evaluate (within the context of the business cycle and conditions of competition that are distinctive to the affected industry) all relevant economic factors which have a bearing on the state of the industry in the United States, including, but not limited to. . . (I) actual and potential decline in output, sales, market share, gross profits, operating profits, net profits, ability to service debt, productivity, return on investments, return on assets, and utilization of capacity, (II) factors affecting domestic prices, (III) actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment, (IV) actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and (V) in {an antidumping investigation}, the magnitude of the margin of dumping.*

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

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

## **Organization of report**

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

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<sup>7</sup> Amended by PL 114-27 (as signed, June 29, 2015), Trade Preferences Extension Act of 2015.

## Market summary

Wood mouldings have a variety of exterior and interior uses, primarily in residential and non-residential construction.<sup>8</sup> The leading U.S. producers of wood mouldings are \*\*\*, while leading producers of wood mouldings outside the United States include \*\*\* of China. The leading importers of wood mouldings from China are \*\*\*. Leading importers of product from nonsubject countries (primarily Brazil, Chile, and Mexico) include \*\*\*. U.S. purchasers are generally firms that purchase product to distribute, to use in manufacturing downstream products (such as door frames), or to sell at retail. The largest purchaser/importers of WMMP included \*\*\*, which accounted for \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively, of all reported purchases and imports of WMMP in 2019.<sup>9</sup>

Apparent U.S. consumption of WMMP totaled approximately 1.0 billion board feet (\$1.7 billion) in 2019. Currently, 15 firms are known to produce WMMP in the United States, five of which are also finishers (i.e., purchase and/or import blanks for the production of WMMP).<sup>10</sup> U.S. producers' U.S. shipments of WMMP totaled 178.8 million board feet (\$406.0 million) in 2019 and accounted for 17.6 percent of apparent U.S. consumption by quantity and \*\*\* percent by value. U.S. finishers' U.S. shipment value added to WMMP produced from imported blanks was \$\*\*\* in 2019 and accounted for \*\*\* percent of apparent consumption by value.<sup>11</sup> U.S. shipments of imports from China totaled 251.7 million board feet (\$407.1 million) in 2019 and accounted for 24.8 percent of apparent U.S. consumption by quantity and 24.3 percent by value. U.S. shipments of imports from nonsubject sources totaled 584.7 million

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<sup>8</sup> Petition, p. 6.

<sup>9</sup> The largest purchasers of domestic WMMP in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported domestic purchases that year. The largest purchasers of WMMP from China in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases of Chinese WMMP that year. The largest purchasers of WMMP from Brazil in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases of Brazilian WMMP that year. The largest purchasers of WMMP from Chile in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases of Chilean WMMP that year. The largest purchasers of WMMP from all other known sources in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases from all other known sources that year.

<sup>10</sup> A blank is roughly cut wood that is intended for further shaping.

<sup>11</sup> U.S. producers' and U.S. finishers' value of U.S. shipments combined was \$428.8 million in 2019 and accounted for 25.6 percent of apparent consumption by value.



board feet (\$839.1 million) in 2019 and accounted for 57.6 percent of apparent U.S. consumption by quantity and 50.1 percent by value.<sup>12</sup>

## **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 15 firms that accounted for the majority of U.S. production of wood mouldings during 2019. U.S. imports are based on the questionnaire responses of 46 firms that accounted for \*\*\* percent of U.S. imports of wood mouldings from China and \*\*\* percent of total U.S. imports in 2019.

## **Previous and related investigations**

Wood mouldings have not been subject to any prior countervailing and antidumping duty investigations in the United States.

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

### **Subsidies**

On January 4, 2021, Commerce published a notice in the *Federal Register* of its final determination of countervailable subsidies for producers and exporters of product from China.<sup>13</sup> Table I-1 presents Commerce's findings of subsidization of WMMP in China.

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<sup>12</sup> Commerce determined that imports of WMMP from Brazil are not being sold at LTFV. Thus, Brazil is presented as a nonsubject source.

<sup>13</sup> 86 FR 67, January 4, 2021.

**Table I-1**

**WMMP: Commerce's final subsidy determination with respect to imports from China**

<b>Entity</b>	<b>Final countervailable subsidy margin (percent)</b>
Fujian Yinfeng Imp & Exp Trading Co., Ltd.	20.56
Fujian Nanping Yuanqiao Wood Industry Co., Ltd.	252.29
All others	20.56

Note.--Commerce determined that Yinfeng Fujian Province Youxi City Mangrove Wood Machining Co., Ltd. and Fujian Province Youxi City Mangrove Wood Machining Co., Ltd., Xicheng Branch are cross-owned affiliates of mandatory respondent Yinfeng.

Source: 86 FR 67, January 4, 2021.

### **Sales at LTFV**

On January 4, 2021, Commerce published notice in the *Federal Register* of its final determinations of sales at LTFV with respect to imports from Brazil and China.<sup>14</sup> Commerce made a negative final determination with respect to imports of WMMP from Brazil.<sup>15</sup> Table I-2 presents Commerce's dumping margins with respect to imports of product from China.

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<sup>14</sup> 86 FR 63 and 86 FR 70, January 4, 2021.

<sup>15</sup> Following Commerce's final negative determination, the Commission terminated its antidumping duty investigation on imports from Brazil. 86 FR 1522, January 8, 2021. Thus, Brazil is presented as a nonsubject source.

**Table I-2****WMMP: Commerce's final weighted-average LTFV margins with respect to imports from China**

<b>Exporter</b>	<b>Producer</b>	<b>Final dumping margin (percent)</b>
Fujian Yinfeng Imp & Exp Trading Co., Ltd/Fujian Province Youxi City Mangrove Wood Machining Co., Ltd. <sup>16</sup>	Fujian Yinfeng Imp & Exp Trading Co., Ltd/Fujian Province Youxi City Mangrove Wood Machining Co., Ltd	44.60
Anji Golden Elephant Bamboo Wooden Industry Co., Ltd	Anji Golden Elephant Bamboo Wooden Industry Co., Ltd	44.60
Anji Huaxin Bamboo & Wood Products Co., Ltd	Anji Huaxin Bamboo & Wood Products Co., Ltd	44.60
Cao County Hengda Wood Products Co., Ltd	Cao County Hengda Wood Products Co., Ltd	44.60
Evermark (Yantai) Co., Ltd	Evermark (Yantai) Co., Ltd	44.60
Fujian Hongjia Craft Products Co., Ltd	Fujian Hongjia Craft Products Co., Ltd	44.60
Fujian Jinquan Trade Co., Ltd	Fujian Province Youxi County Baiyuan Wood Machining Co., Ltd	44.60
Fujian Nanping Yuanqiao Wood Industry Co., Ltd	Fujian Nanping Yuanqiao Wood Industry Co., Ltd	44.60
Fujian Province Youxi County Chang Sheng Wood Machining Co., Ltd	Fujian Province Youxi County Chang Sheng Wood Machining Co., Ltd	44.60
Fujian Sanming City Donglai Wood Co., Ltd	Fujian Sanming City Donglai Wood Co., Ltd	44.60
Fujian Shunchang Shengsheng Wood Industry Limited Company	Fujian Shunchang Shengsheng Wood Industry Limited Company	44.60
Fujian Wangbin Decorative Material Co., Ltd	Fujian Wangbin Decorative Material Co., Ltd	44.60
Fujian Youxi Best Arts & Crafts Co., Ltd	Fujian Ruisen International Industrial Co., Ltd	44.60
Fujian Zhangping Kimura Forestry Products Co., Ltd	Fujian Zhangping Kimura Forestry Products Co., Ltd	44.60
Heze Huasheng Wooden Co., Ltd	Heze Huasheng Wooden Co., Ltd	44.60
Huaan Longda Wood Industry Co., Ltd	Huaan Longda Wood Industry Co., Ltd	44.60
Jiangsu Chen Sheng Forestry Development Co., Ltd	Jiangsu Chen Sheng Forestry Development Co., Ltd	44.60
Jiangsu Wenfeng Wood Co., Ltd	Jiangsu Wenfeng Wood Co., Ltd	44.60
Lanzhou Xinyoulian Industrial Co., Ltd	Lanzhou Xinyoulian Industrial Co., Ltd	44.60
Lianyungang Tianke New Energy Technology Co., Ltd	Lianyungang Tianke New Energy Technology Co., Ltd	44.60
Longquan Jiefeng Trade Co., Ltd	Zhejiang Senya Board Industry Co., Ltd	44.60
Nanping Huatai Wood & Bamboo Co., Ltd	Nanping Huatai Wood & Bamboo Co., Ltd	44.60
Nanping Qiangmei Import & Export Co., Ltd	Pucheng County Qiangmei Wood Company, Ltd	44.60
Oppein Home Group Inc	Oppein Home Group Inc.	44.60
Putian Yihong Wood Industry Co., Ltd	Putian Yihong Wood Industry Co., Ltd	44.60
Qimen Jianxing Bamboo and Wood Goods Co., Ltd	Qimen Jianxing Bamboo and Wood Goods Co., Ltd	44.60

Table continued on next page.

**Table I-2--Continued****WMMP: Commerce's final weighted-average LTFV margins with respect to imports from China**

<b>Exporter</b>	<b>Producer</b>	<b>Final dumping margin (percent)</b>
Qingdao Sanhe Dacheng International Trade Co., Ltd	Yongan Tenlong Bamboo & Wood Products Co., Ltd	44.60
Rizhao Duli Trade Co., Ltd	Rizhao Jiayue Industry & Trading Co., Ltd	44.60
Rizhao Guantong Woodworking Co., Ltd	Shouguang Luli Wood Industry Co., Ltd/Rizhao Forest International Trading Co., Ltd/Xiamen Oubai Industry & Trade Co., Ltd	44.60
Sanming Lingtong Trading Co., Ltd	Sanming Shitong Wood Industry Co., Ltd	44.60
Shandong Miting Household Co., Ltd	Shandong Jicheng Decorative Material Co., Ltd	44.60
Shaxian Hengtong Wood Industry Co., Ltd	Shaxian Hengtong Wood Industry Co., Ltd	44.60
Shaxian Shiyiwood, Ltd	Shaxian Shiyiwood, Ltd	44.60
Shuyang Kevin International Co., Ltd	Shuyang Zhongding Decoration Materials Co., Ltd	44.60
Suqian Sulu Import & Export Trading Co., Ltd	Suqian Sulu Import & Export Trading Co., Ltd	44.60
The Ancientree Cabinet Co., Ltd	The Ancientree Cabinet Co., Ltd	44.60
Xiamen Jinxi Building Material Co., Ltd	Zhangzhou City Jinxi Building Material Co., Ltd	44.60
Xuzhou Goodwill Resource Co., Ltd	Pucheng County Qiangmei Wood Company, Ltd/Lianyungang Tianke New Energy Technology Co., Ltd/Fujian Sanming City Donglai Wood Co., Ltd/Zhangzhou Fukangyuan Industry and Trade Co., Ltd	44.60
Xuzhou Hexi Wood Co., Ltd	Xuzhou Hexi Wood Co., Ltd	44.60
Zhangping San Chuan Industrial & Trade Co., Ltd	Zhangping San Chuan Industrial & Trade Co., Ltd	44.60
Zhangzhou Green Wood Industry and Trade Co., Ltd	Zhangzhou Green Wood Industry and Trade Co., Ltd	44.60
Zhangzhou Wangjiamei Industry and Trade Co., Ltd	Zhangzhou Wangjiamei Industry and Trade Co., Ltd	44.60
Zhangzhou Yihong Industrial Co., Ltd	Zhangzhou Yihong Industrial Co., Ltd	44.60
China-Wide Entity		230.36

Note.—Commerce determined that Yinfeng/Mangrove is a single entity.

Source: 86 FR 63, January 4, 2021.

## The subject merchandise

### Commerce's scope

In the current proceeding, Commerce has defined the scope as follows:<sup>16</sup>

*The merchandise subject to this investigation consists of wood mouldings and millwork products that are made of wood (regardless of wood species), bamboo, laminated veneer lumber (LVL), or of wood and composite materials (where the composite materials make up less than 50 percent of the total merchandise), and which are continuously shaped wood or finger-jointed or edge-glued moulding or millwork blanks (whether or not resawn). The merchandise subject to this investigation can be continuously shaped along any of its edges, ends, or faces. The percentage of composite materials contained in a wood moulding or millwork product is measured by length, except when the composite material is a coating or cladding. Wood mouldings and millwork products that are coated or clad, even along their entire length, with a composite material, but that are otherwise comprised of wood, LVL, or wood and composite materials (where the non-coating composite materials make up 50 percent or less of the total merchandise) are covered by the scope.*

*The merchandise subject to this investigation consists of wood, LVL, bamboo, or a combination of wood and composite materials that is continuously shaped throughout its length (with the exception of any endwork/dados), profiled wood having a repetitive design in relief, similar milled wood architectural accessories, such as rosettes and plinth blocks, and finger-jointed or edge-glued moulding or millwork blanks (whether or not resawn). The scope includes continuously shaped wood in the forms of dowels, building components such as interior paneling and jamb parts, and door components such as rails, stiles, interior and exterior door frames or jambs (including split, flat, stop applied, single- or double-rabbeted), frame or jamb kits, and packaged door frame trim or casing sets, whether or not the door components are imported as part of a door kit or set.*

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<sup>16</sup> 86 FR 63 and 86 FR 67, January 4, 2021.

*The covered products may be solid wood, laminated, finger-jointed, edge-glued, face-glued, or otherwise joined in the production or remanufacturing process and are covered by the scope whether imported raw, coated (e.g., gesso, polymer, or plastic), primed, painted, stained, wrapped (paper or vinyl overlay), any combination of the aforementioned surface coatings, treated, or which incorporate rot-resistant elements (whether wood or composite). The covered products are covered by the scope whether or not any surface coating(s) or covers obscure the grain, textures, or markings of the wood, whether or not they are ready for use or require final machining (e.g., endwork/dado, hinge/strike machining, weatherstrip or application thereof, mitre) or packaging.*

*All wood mouldings and millwork products are included within the scope even if they are trimmed; cut-to-size; notched; punched; drilled; or have undergone other forms of minor processing.*

*Subject merchandise also includes wood mouldings and millwork products that have been further processed in a third country, including but not limited to trimming, cutting, notching, punching, drilling, coating, or any other processing that would not otherwise remove the merchandise from the scope of this investigation if performed in the country of manufacture of the in-scope product.*

*Excluded from the scope of this investigation are countertop/butcherblocks imported as a full countertop/butcherblock panel, exterior fencing, exterior decking and exterior siding products (including solid wood siding, non-wood siding (e.g., composite or cement), and shingles) that are not LVL or finger jointed; finished and unfinished doors; flooring; parts of stair steps (including newel posts, balusters, easing, gooseneck, risers, treads, rail fittings and stair stringers); picture frame components three feet and under in individual lengths; and lumber whether solid, finger-jointed, or edge-glued. To be excluded from the scope, finger-jointed or edge-glued lumber must have a nominal thickness of 1.5 inches or greater and a certification stamp from an American Lumber Standard Committee-certified grading agency. The exclusion for lumber whether solid, finger-jointed, or edge-glued does not apply to screen/"surfaced on 4 sides" (S4S) and/or "surface 1 side, 2 edges" (S1S2E) stock (also called boards) that are finger-jointed and/or edge-glued, or to finger-jointed and/or edge-glued moulding or millwork blanks (whether or not resawn). Accordingly, S4S and S1S2E stock/boards that are not finger-jointed or edge-glued are excluded from the scope of this investigation.*

*Excluded from the scope of this investigation are all products covered by the scope of the countervailing duty order on Hardwood Plywood from the People's Republic of China. See Certain Hardwood Plywood Products from the People's Republic of China: Countervailing Duty Order, 83 FR 513 (January 4, 2018).*

*Excluded from the scope of this investigation are all products covered by the scope of the countervailing duty order on Multilayered Wood Flooring from the People's Republic of China. See Multilayered Wood Flooring from the People's Republic of China: Countervailing Duty Order, 76 FR 76693 (December 8, 2011).*

*Excluded from the scope of this investigation are all products covered by the scope of the countervailing duty order on Wooden Cabinets and Vanities from the People's Republic of China. See Wooden Cabinets and Vanities and Components Thereof from the People's Republic of China: Countervailing Duty Order, 85 FR 22134 (April 21, 2020).*

## **Tariff treatment**

Based upon the scope set forth by Commerce, information available to the Commission indicates that the merchandise subject to these investigations is provided for in statistical reporting numbers 4409.10.4010, 4409.10.4090, 4409.10.4500, 4409.10.5000, 4409.22.4000, 4409.22.5000, 4409.29.4100, and 4409.29.5100 of the Harmonized Tariff Schedule of the United States (“HTS”). Imports of WMMP may also be reported under HTSUS numbers: 4409.10.6000, 4409.10.6500, 4409.22.6000, 4409.22.6500, 4409.29.6100, 4409.29.6600, 4418.20.4000, 4418.20.8030, 4418.20.8060, 4418.99.9095 and 4421.99.9780.

The 2020 general rate of duty is free for ten of these HTS subheadings (4409.10.40, 4409.10.45, 4409.10.50, 4409.10.60, 4409.22.40, 4409.22.50, 4409.22.60, 4409.29.41, 4409.29.51, and 4409.29.61), 3.2 percent *ad valorem* for one HTS subheading (4418.99.90), 3.3 percent *ad valorem* for one HTS subheading (4421.99.97), 4.8 percent *ad valorem* for two HTS subheading (4418.20.40 and 4418.20.80) and 4.9 percent *ad valorem* for three HTS subheadings (4409.10.65, 4409.22.65, and 4409.29.66). Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

## Section 301 tariff treatment

Merchandise classifiable in these HTS subheadings were included among the group of products from China that are subject to an additional duty of 25 percent ad valorem, under HTS heading 9903.88.03.<sup>17</sup> Section 301 duty exclusions for HTS subheading 4409.29.41 are covered under HTS heading 9903.88.34,<sup>18</sup> while exclusions for HTS statistical reporting number 4421.99.9780 are covered under HTS heading 9903.88.38.<sup>19</sup>

## The product<sup>20</sup>

### Description and applications

WMMP are wood-constructed products used mainly in residential and non-residential buildings and can be used for both interior and exterior applications. These products have both functional (e.g. door jamb) and decorative (e.g. mouldings) uses but are not structural (e.g. framing).

Millwork is a general term referring to woodwork that is produced in a mill; the universe of millwork products is extensive and diverse. This broad category of products includes items like window and door frames, mouldings, and other dimension stock (worked wood products that are cut or shaped). Millwork products typically are installed with screws, nails, or adhesives.

The door frame (also called a jamb) surrounds the door and is made of three separate pieces: two vertical frames called side jambs and the horizontal frame called the head jamb. These pieces create a “frame” in which the door sits and are sometimes sold as a kit. Interior and exterior door heights are usually 80-inches (6-feet, 8-inches, which is referred to as 6/8), although some openings can be larger or smaller; kits generally are sold with side jambs in 7-foot lengths. Doorway widths also vary but range from 18- to 36-inches.<sup>21</sup> Other WMMP can be used in conjunction with the door frame. For example, a mullpost is used when a frame is used between a sidelite<sup>22</sup> and the door slab. An astragal is attached to the passive door (the door

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<sup>17</sup> *HTSUS (2020) Revision 26*, USITC Publication No. 5134, October 2020, pp. 99-III-35 and 99-III-36.

<sup>18</sup> *HTSUS (2020) Revision 26*, USITC Publication No. 5134, October 2020, p. 99-III-124.

<sup>19</sup> *HTSUS (2020) Revision 26*, USITC Publication No. 5134, October 2020, p. 99-III-136.

<sup>20</sup> Unless otherwise noted, the information in this section is based on Petition, Vol. I, pp. 4-9. This section provides a broad outline of the possible products classified as millwork and mouldings as it is not feasible to discuss all of them.

<sup>21</sup> Jones, Carlyle, SFGATE, “How big are average doorways?,” December 17, 2018, <https://homeguides.sfgate.com/big-average-doorways-92628.html>.

<sup>22</sup> A sidelite is typically a narrow window placed on one or both sides of a home’s exterior door.



that is typically closed) in double door applications; when the two doors are closed, it covers the space between them.

A moulding<sup>23</sup> is a decorative element that is characterized by its placement, the material that it is made from, and its profile and level of ornamentation. They are strips of materials used to cover transitions between surfaces (e.g. at the corners between walls and ceilings or at floor intersections), around openings (e.g. windows and doors) or for decoration in the middle of walls (e.g. chair rails). Most homes feature at least door and window casings and baseboards, while others can have multiple applications.

Wood has been traditionally used to make mouldings.<sup>24</sup> Mouldings may be sold in a natural finish state (wood grain is visible and unobscured for possible staining), primed, painted, coated or wrapped.<sup>25</sup> They can be made of hardwoods (e.g. maple and birch) or softwoods (e.g. pine), based on the desired type of finish (e.g. stained or an opaque cover), but they are also made from laminated veneer lumber (LVL) or wood and composite materials.<sup>26</sup> Typically, high grade solid wood tends to be used for stained trim and lower grade wood, finger-jointed wood or LVL tend to be used for painted trim.

There are many types of mouldings.<sup>27</sup> Mouldings can be plain or have enhanced profiles, with various decorative details (Figure I-1). Each is designed for a specific finish purpose and are made with almost any width, varying thicknesses, and configurations. Several stock profile mouldings can be combined to make a built-up moulding, creating the look of a custom trim. Although widths and thicknesses differ based on application, the lengths are typically 8-foot (96-inches) but are also sold in other lengths or units.

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<sup>23</sup> Moulding is also spelled “molding” in the United States. Merriam-Webster, <https://www.merriam-webster.com/dictionary/molding>.

<sup>24</sup> Substitute products include those that are not made from wood, and therefore have varied relative properties, such as polystyrene, polyurethane, and Polyvinyl chloride (PVC).

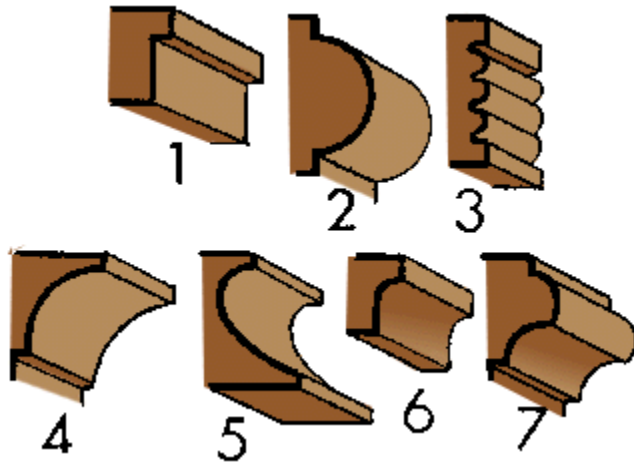
<sup>25</sup> Vinyl wrapped wood mouldings are wrapped with a vinyl film.

<sup>26</sup> The scope on these products states that composite materials are to make up less than 50 percent of the total. 85 FR 6502, February 5, 2020.

LVL is made by bonding wood veneers with the grains parallel to the length of the billet. APA-The Engineered Wood Association, “Laminated Veneer Lumber (LVL), <https://www.apawood.org/structural-composite-lumber>, accessed January 31, 2020.

<sup>27</sup> The universe of decorative wood mouldings is extensive. The discussion provided is not exhaustive; more information is available in \*\*\*.

**Figure I-1**  
**Selected moulding designs**



1 fillet and fascia, 2 torus, 3 reeding, 4 cavetto, 5 scotia, 6 congé, 7 beak

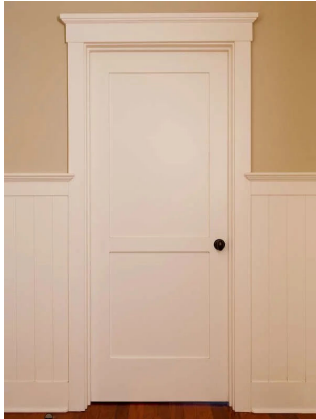
Source: Merriam-Webster Dictionary, <https://www.merriam-webster.com/dictionary/molding>, accessed January 20, 2020.

There are four main moulding categories—casing, crown, wall base (baseboard), and wall trim, depending on where it is installed. Standard mouldings are related to the room’s aesthetics and are intended to be installed using a balanced scale to fit a specific space. Casing trim is placed around openings, such as windows and doors. It is designed to cover the gap between walls and window frame or door. Inside, it is used for aesthetic purposes. Externally, in addition to aesthetics, it is used to seal the window frame to the house. The most common type of doorway casing has three separate pieces: one short piece (the head casing) at the top of the door and two longer pieces for the sides of the door (Figure I-2). There are several variations, but the width of these casings usually spans 2-1/4 or 3-1/2 inches (custom products can be wider).<sup>28</sup> They tend to match the same mouldings used in other applications so that the room or the building exterior has a cohesive design. For example, brick moulding is a type of external casing that attaches to the outside edge of the door frame and covers the gap between the frame and the home’s exterior surface (e.g. masonry).

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<sup>28</sup> Taylor, Glenda, “All you need to know about doorway casing,” <https://www.bobvila.com/articles/doorway-casing/>, accessed January 20, 2020.

**Figure I-2**  
**Door casing, interior**



Source: Schwartz, Donna. "Know your moldings: 10 popular trim styles to spiff up any space," <https://www.bobvila.com/slideshow/know-your-moldings-10-popular-trim-styles-to-spiff-up-any-space-44353#casing-and-door-casing-styles>, accessed January 20, 2020.

Ceiling—also called crown or cornice—moldings are architectural features that cover the intersection of walls and ceilings, usually over an angle (Figure I-3). They are generally sized to taste but tend to be balanced with the baseboard. The rule-of-thumb is to use wider crown moulding as the room is larger and taller. The concave profile of cove mouldings (a type of ceiling moulding) make them useful as inside corner guards, or as a cornice to hide joints. Baseboard usually covers the lowest part of an interior wall to cover the joint between the wall and the floor. Baseboard is referred to by several other terms, including wall base moulding, skirting board, skirting, mopboard, and floor moulding. Baseboards can be smaller (such as shoe moulding) or larger (such as 6-inch tall boards). Most baseboards tend to be  $\frac{1}{2}$  to 1-inch thick and 3 to 8-inches tall.<sup>29</sup> They can be simple or ornate. Shoe moulding (also known as base shoe) is a thin strip, typically  $\frac{3}{4}$ -inch, of moulding that tends to be used as the baseboard or paired with larger baseboard and to cover gaps between the baseboard and the floor (Figure I-4). Although shoe moulding is preferred for baseboard trim, quarter round (one-quarter of a round dowel) is also used for this purpose.

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<sup>29</sup> Morris, Mark. SFGATE, "The size of wall molding," December 10, 2018, <https://homeguides.sfgate.com/size-wall-molding-98866.html>.

**Figure I-3**  
**Crown moulding**



Source: Schwartz, Donna. “Know your moldings: 10 popular trim styles to spiff up any space,” <https://www.bobvila.com/slideshow/know-your-moldings-10-popular-trim-styles-to-spiff-up-any-space-44353#casing-and-door-casing-styles>, accessed January 20, 2020.

**Figure I-4**  
**Baseboard with shoe moulding**



Source: Taylor, Glenda, “All you need to know about shoe molding,” <https://www.bobvila.com/articles/shoe-molding/>, accessed January 20, 2020.

There are many wall trim molding applications, including but not limited to chair rails, wainscoting, board-and-batten, and wall (picture) frame moulding. These moulding types are intended to add architectural interest to a room and are typically used on a flat surface—wall frame moulding creates a picture frame on the flat wall (Figure I-5). Some of these applications are not only decorative; chair rail is moulding that protects walls from dents and scuffs from the backs of chairs; it is attached horizontally around a room’s perimeter at about the height of the top of a typical chair, or about 36-inches (Figure I-6). Standard chair-rail moulding is 2-1/4 inches wide.<sup>30</sup> Wainscoting is a combination of paneling topped with mouldings that is installed

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<sup>30</sup> Shaddy, Wade, Hunker, “The standard wood trim molding sizes,” <https://www.hunker.com/12610493/the-standard-wood-trim-molding-sizes>, accessed January 21, 2020.

around the lower part of walls around a room’s perimeter. Board-and-batten is a combination of paneling and strips of moulding placed across the joint between boards (Figure I-7).

**Figure I-5**  
**Wall “picture” frame moulding**



Source: Franco, Michael, “9 Ways to dress up a room with molding,” <https://www.bobvila.com/slideshow/9-ways-to-dress-up-a-room-with-molding-46899#white-trim>, accessed January 20, 2020.

**Figure I-6**  
**Chair rail**



Source: Schwartz, Donna. “Know your moldings: 10 popular trim styles to spiff up any space,” <https://www.bobvila.com/slideshow/know-your-moldings-10-popular-trim-styles-to-spiff-up-any-space-44353#casing-and-door-casing-styles>, accessed January 20, 2020.

**Figure I-7**  
**Board-and-batten wall moulding**



Source: Schwartz, Donna. "Know your moldings: 10 popular trim styles to spiff up any space," <https://www.bobvila.com/slideshow/know-your-moldings-10-popular-trim-styles-to-spiff-up-any-space-44353#casing-and-door-casing-styles>, accessed January 20, 2020.

Most of these products are sold for use in housing and other building construction industries. Most domestic millwork operators are located either near sawmills, key consumer markets, or as close to both as is practicable, to reduce transportation costs. These manufacturers sell to distributors, construction companies and contractors, lumber wholesalers, and home improvement retailers.<sup>31</sup>

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<sup>31</sup> McGinley, Devin, IBISWorld, "Millwork in the US: Open doors: Rising disposable income will support remodeling activity, boosting the industry," Industry Report 32191, May 2016.

## Manufacturing processes

The manufacturing process for WMMP requires a variety of inputs and is done in several stages, including: drying, ripping, cutting, possible joining, profile shaping, and covering. The process is typically split into two phases called the “front-end,” (which produces the wood blank and includes drying, ripping, cutting, and joining) and the “back-end” (which shapes and finishes the wood blank<sup>32</sup> or LVL billet into the subject WMMP).<sup>33</sup> Production involves wood products which are intended as the predominant composition of the diverse line of subject MWWP. The wood can be pure softwood or hardwood (representing a variety of wood species), laminated veneer lumber (LVL), or a mix of wood and composite materials.<sup>34</sup>

The first stage of the process is to produce the wood blank—the front end of the manufacturing process for those firms that manufacture blanks. Prior to the manufacturing process, the moisture content of the wood inputs—generally wood boards—must be reduced, in kilns or using other equipment and processes to a moisture content of 8 to 12 percent.<sup>35</sup> At the ripping stage, the wood boards are cut parallel to the grain (ripped) to specified width and thickness and inspected to maximize blank production.

To get the best wood, defects are identified for removal by grading and marking imperfections or deviations from the qualities that make the wood suitable for the intended purpose. The inspection process is performed by optical scanner or trained personnel who map a cutting plan to maximize material that is clear of imperfections. Imperfections can include knots<sup>36</sup>, pitch pockets<sup>37</sup>, fungal staining<sup>38</sup>, or other unwanted characteristics.

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<sup>32</sup> A blank is roughly cut wood that is intended for further shaping.

<sup>33</sup> Hearing transcript, p.17 and p. 19 (Brightbill); p. 48 (Kaplan); p. 117 (Easton); p. 117 (MacDonald); p. 144 (Emerson).

<sup>34</sup> The scope on these products states that composite materials are to make up less than 50 percent of the total. 85 FR 6502, February 5, 2020.

<sup>35</sup> Conference transcript, p. 88 (Carroll).

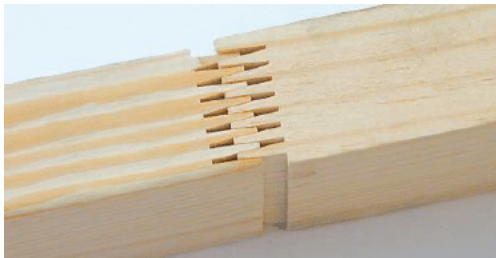
<sup>36</sup> A knot is from the base connection of a branch that was cut from a tree; it is a source of weakness and a visible imperfection that is circular and darker than the surrounding wood.

<sup>37</sup> A pitch pocket is a softwood defect from an opening in the grain that holds resin (or pitch).

<sup>38</sup> For example, blue stain fungi (or sapstain), mainly found in softwoods, discolors wood fiber compared to what is typical for that species. The wood may have a blue, black or gray color, which makes it unsuitable for some applications.

The next stage cuts imperfections from the ripped wood using the cutting plan devised in the prior step: the plan optimizes material use by limiting waste and maximizing the best available wood while meeting the desired lengths.<sup>39</sup> This stage can result in cuts that are shorter than standard lengths, and these shorter lengths can then be finger-jointed (Figure I-8)<sup>40</sup> by shaping complementary, interlocking profiles into the ends of each piece and gluing them together.<sup>41</sup>

**Figure I-8**  
**Finger joint**



Source: Sviták, Martin & Gašparík, Miroslav & Penc, Jan. (2014). Heat Resistance of Glued Finger Joints in Spruce Wood Constructions. *Bioresources*. 9. 7529-7541. 10.15376/biores.9.4.7529-7541.

The next stage—the back end— includes resawing the solid wood blank, finger-jointed blank, or LVL billet<sup>42</sup> to precise dimensions so that it can be efficiently fed into one or more moulders.<sup>43</sup> For those firms that do not manufacture blanks (or LVL billets), this is the beginning of the manufacturing process. The equipment for this stage removes wood at high speed; it has moulding heads (depending on the sophistication of the profile (shape), and there may be

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<sup>39</sup> Mixed lumber shop grades are commonly used. For softwood lumber, such as ponderosa pine, shop grades used are generally No. 3 or better, but are known to use the lower shop grade, Paragraph 99 (or P99). The name for this grade is taken from the Western Wood Products Association grading book's paragraph 99 of the factory lumber section.

<sup>40</sup> The finger joint gets its name because it is said to resemble the interlocking of fingers of two human hands. The bond created by gluing the finger surface area is stronger than it would be if the butts (a butt joint) of the two pieces were glued together.

<sup>41</sup> In addition, products may be edge-glued to make them wider or face-glued to make them thicker.

<sup>42</sup> LVL billets are a feedstock for WMMP (e.g. door frames). LVL is manufactured by laminating thin wood veneers with the grains parallel to the length of the billet; veneers are fed into a press, glue is applied, and then formed into a stack that is subjected to pressure and heat for curing. The cured LVL billets are then ripped and crosscut to ready them for further processing. Domestic LVL production is available for use in these products. Petitioner's post-conference brief, p. 42.

<sup>43</sup> Moulding producers are known to purchase wood blanks and LVL billets from other firms and perform only the back end of the process. Others are vertically integrated: they source lumber, produce the blank, manufacture the moulding, and distribute products to customers. Conference transcript, p. 91 (Carroll); Petitioner's post-conference brief, p. 18; and Hearing transcript, pp. 30-31 (Easton).



several heads) that use knives that spin at high speed to carve the blank to the desired profile; this process may involve multiple shaping steps, depending on the sophistication of the desired appearance. Aside from the forming of wooden components into the proper size and shape, components may be drilled, notched, punched or otherwise processed, where required. For example, a lock hole may be drilled into a door jamb. The WMMP can then be left unfinished for staining, coated by gesso, priming, painting, or another desired surface cover.<sup>44</sup>

## Domestic like product issues

The petitioner argues that WMMP are a single like product, co-extensive with the scope of these investigations.<sup>45</sup> Petitioner contends that the various types of WMMP share “the same general physical characteristics, including shape and materials,” and uses, are interchangeable, have similar channels of distribution, are viewed by customers and producers as a single continuum of products, are manufactured in common facilities, and are comparably priced.<sup>46</sup> The petitioner also contends that WMMP produced from solid wood, finger-jointed wood, and LVL feedstock should constitute a single like product.<sup>47</sup> The petitioner also argues that producers that purchase finger-jointed (FJ) blanks for use in the back end production process engage in sufficient production related activities to qualify as domestic producers.<sup>48</sup>

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<sup>44</sup> Gesso is a fluid coating that is generally made by mixing a binder with chalk, gypsum, and pigment. Gesso and primers are used to prepare the surface for final finish painting by providing a ‘tooth’ that allows paint to adhere to the surface. Some producers combine gesso with latex paint, intended to provide a smooth finish and forego the need for sanding after installation and before finish painting. Gesso can be applied in either a thin layer, like primer, or a thicker extrusion coating to smooth defects or wood grain appearance. Respondent American Moulding and Millwork Alliance (AMMA) postconference brief, p. 36; and Hearing transcript, p. 32 (Easton), p. 63-64 (Gartman), p. 67 (Easton), p. 211 (Ammons); Petitioner’s posthearing brief, Exhibit 1, pp. 65-66, and Exhibit 13, p. 1.

<sup>45</sup> Petitioner’s postconference brief, p. 3; Petitioner’s posthearing brief, pp. 1-2 and Exhibit 1, pp. 4-20 and p. 28.

<sup>46</sup> Petition, p. 14, Petitioner’s postconference brief, p. 3-4 and p. 6; Petitioner’s post conference brief, Exhibit 1, p. 4. and p. 7; and \*\*\*; and Petitioner’s posthearing brief, pp. 1-2 and Exhibit 1, pp. 4-20 and p. 28.

<sup>47</sup> Petitioner’s postconference brief, p. 3 and exhibit 1, pp. 28-31, Hearing transcript, p. 121 (Easton).

<sup>48</sup> Petitioner’s postconference brief, p. 4; Hearing transcript, p. 48 (Kaplan) and p. 55 (Brightbill).

The petitioner asserts that Commission should not define the domestic like product to include out-of-scope mouldings that are manufactured with medium density fiberboard (MDF).<sup>49 50</sup> Petitioner indicates that mouldings made with MDF do not have the same physical characteristics and end uses, use a different front end production process, have lower prices, and are classified under a separate set of HTS numbers from the in-scope products.<sup>51</sup> For example, MDF cannot be used for door frames, any exterior application or in wet and humid environments (e.g. bathrooms, basements, and kitchens).<sup>52</sup>

In contrast, respondents contend that the Commission should define in-scope WMMP made with LVL, an engineered wood product, as a separate like product. They assert that LVL moulding and millwork has distinctive physical characteristics that set it apart from in-scope, non-LVL WMMP. Respondents argue that although LVL- and non-LVL mouldings and millwork could share back-end manufacturing processes, LVL WMMP's front-end manufacturing process distinguishes it from WMMP made from lumber of FJ blanks; they also contend that there is different finishing work that must be done to LVL.<sup>53</sup> They also claim that LVL has superior attributes (e.g. strength-to-weight, uniformity, and stability) and performs differently in industry standard testing than other FJ WMMP<sup>54</sup>; has narrower—but shared—channels of distribution; and is perceived as superior by customers.<sup>55</sup>

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<sup>49</sup> MDF is an engineered wood product made with sawdust and shavings, the byproducts of industrial milling. These fibers are mixed with resin and under heat and pressure, they are formed into uniform panels. Fox, Steven. "MDF 101," <https://www.bobvila.com/articles/what-is-mdf/>, accessed February 4, 2020; ScienceDirect. "Medium Density Fiberboard," <https://www.sciencedirect.com/topics/engineering/medium-density-fiberboard>, accessed December 31, 2020.

The scope on WMMP states that composite materials are to make up less than 50 percent of the total. 85 FR 6502, February 5, 2020.

<sup>50</sup> Petitioner's postconference brief, p. 4; Petitioner's posthearing brief, pp. 1-2 and Exhibit 1, pp. 20-28.

<sup>51</sup> Petitioner's postconference brief, p. 3 and exhibit 1, pp. 21-32; Hearing transcript, p. 20 (Brightbill), p. 38 (Easton), p. 47 (Trapp), and p. 48 (Kaplan).

<sup>52</sup> Petitioner's postconference brief, p. 39.

<sup>53</sup> Conference transcript 142-143 (Reid).

<sup>54</sup> Respondent AMMA postconference brief, p. 12; Hearing transcript, p. 181-2 (Dixon); Respondent JELD-WEN posthearing brief, pp. 1-11.

<sup>55</sup> Respondent Composite Technology International, Inc. (CTI) postconference brief, pp. 2-9; and Respondent AMMA postconference brief, pp. 6-20.

Respondents also argue that the Commission should define a domestic like product corresponding to in-scope WMMP and out-of-scope moulding and millwork products (MMP) made from MDF.<sup>56</sup> They contend that, analogous to mouldings and millwork made with LVL, MMP made with MDF have different front end inputs from those used for in-scope non-LVL wood inputs, but have a similar back end, where the MDF is shaped into moulding. Respondents assert that production using MDF would require minimal equipment adjustment—carbide blades are used for shaping MDF moulding and steel blades are used for shaping FJ WMMP.<sup>57</sup> They also argue that MDF MMP and WMMP are produced to the same specifications (profile, thickness, length, and height), and share the same channels of distribution. However, respondents acknowledge that MDF MMP is less expensive than FJ WMMP. Respondents further argue that these products are used in the same interior decorative applications, while acknowledging that MDF MMP are not to be used for structural uses, exterior or high moisture area applications.<sup>58</sup>

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

### **Comparability of in-scope LVL WMMP and all other WMMP**

The Commission asked U.S. producers, importers, and purchasers to comment on the comparability of in-scope LVL WMMP and all other WMMP, based on the Commission’s six like product factors. Table I-3 presents a tabulation of their responses. Table I-4 presents information on domestic producers’ manufacturing facilities, table I-5 presents the average unit values of U.S. producers’ U.S. shipments of LVL WMMP and all other WMMP, and table I-6 presents U.S. producers’ U.S. shipments of LVL and all other WMMP by channels of distribution. For additional information, including narrative responses from U.S. producers, U.S. importers, and U.S. purchasers and trade and financial data of WMMP excluding LVL WMMP, see appendix F.

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<sup>56</sup> Respondent AMMA postconference brief, pp. 23; Hearing transcript, p. 216 (Emerson); Associacao Brasileira da Industria de Madeira Processada Mecanicamente (ABIMCI) posthearing brief, pp. 1-3.

<sup>57</sup> Conference transcript 100-101 (Caldwell).

<sup>58</sup> Respondent AMMA postconference brief, pp. 23-35; and Associacao Brasileira da Industria de Madeira Processada Mecanicamente (ABIMCI) postconference brief, pp. 4-9; Hearing transcript, p. 47 (Trapp) and pp. 80-81 (Easton); and Petitioner’s posthearing brief, exh 1 at pp. 20-23.

When asked to compare LVL WMMP with other in-scope WMMP, domestic producers were most likely to find them fully comparable on interchangeability and channels of distribution, but mostly comparable with respect to other factors. U.S. importers and purchasers were most likely to rate the products as only somewhat comparable, with channels of distribution being the exception. Only one U.S. producer, \*\*\*, reported production of LVL WMMP and \*\*\*. \*\*\* LVL WMMP U.S. shipments were sold to \*\*\*, with \*\*\*. U.S. producers' U.S. shipments of all other WMMP were sold to distributors, retailers, and end users with \*\*\*.

**Table I-3**  
**WMMP: U.S. producers', U.S. importers' and U.S. purchasers' comparisons of in-scope WMMP vs. in-scope LVL WMMP**

Factor	Count of firms			
	Fully	Mostly	Somewhat	Never
<b>U.S. producers</b>				
In-scope WMMP vs in-scope LVL WMMP.-- Physical characteristics and end uses	3	6	1	2
Interchangeability	5	4	2	1
Manufacturing facilities and production employees	1	5	3	2
Channels of distribution	8	3	1	---
Customer and producer perceptions	3	6	2	1
Price	---	5	5	2
<b>U.S. importers</b>				
In-scope WMMP vs in-scope LVL WMMP.-- Physical characteristics and end uses	1	9	15	3
Interchangeability	6	5	15	2
Manufacturing facilities and production employees	---	3	15	6
Channels of distribution	15	9	4	---
Customer and producer perceptions	1	6	16	3
Price	1	4	15	4
<b>U.S. purchasers</b>				
In-scope WMMP vs in-scope LVL WMMP.-- Physical characteristics and end uses	5	5	9	5
Interchangeability	8	4	11	1
Manufacturing facilities and production employees	5	1	6	3
Channels of distribution	12	4	6	---
Customer and producer perceptions	2	8	9	4
Price	2	2	14	6

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

**Table I-4**  
**WMMP: U.S. producers' manufacturing facilities, 2019**

	Number of firms (count)
Only had other WMMP production (i.e., firm does not produce LVL WMMP)	14
Only produced LVL WMMP (i.e., firm does not produce other WMMP)	1
Produced both LVL WMMP and other WMMP.-- Using the same machinery/employees	---
Using different machinery/employees	---

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

**Table I-5**  
**WMMP: U.S. producers' U.S. shipments average unit value of in-scope other WMMP and in-scope LVL WMMP, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Unit Value (dollars per board foot)</b>				
U.S. producers' U.S. shipments.-- In-scope other WMMP	***	***	***	***	***
In-scope LVL WMMP	***	***	***	***	***

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

**Table I-6**  
**WMMP: U.S. producers' U.S. shipments of in-scope other WMMP and in-scope LVL WMMP, by channels of distribution, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of U.S. shipments (percent)</b>				
U.S. producers' U.S. shipments of other WMMP.-- to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. producers' U.S. shipments of LVL WMMP.-- to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

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

## **Comparability of in-scope WMMP and out-of-scope MDF MMP**

The Commission asked U.S. producers, importers, and purchasers to comment on the comparability of in-scope WMMP and out-of-scope MDF MMP, based on the Commission's six like product factors. Table I-7 presents a tabulation of their responses. Table I-8 presents information on domestic producers' manufacturing facilities, table I-9 presents the average unit values of U.S. producers' U.S. shipments of WMMP and out-of-scope MDF MMP, and table I-10 presents U.S. producers' U.S. shipments of WMMP and out-of-scope MDF MMP by channels of distribution. For additional information, including narrative responses from U.S. producers, U.S. importers, and U.S. purchasers and trade and financial data of WMMP and out-of-scope MDF MMP combined, see appendix G.

When asked to compare WMMP with out-of-scope MDF MMP, domestic producers, importers, and purchasers were most likely to find them only somewhat comparable on most factors, with the exception of channels of distribution and price. All market participants were more likely to rate the products as fully or mostly comparable on channels of distribution and only somewhat or never comparable on price. Eight firms reported production of MDF MMP. Four of these firms only produce MDF MMP,<sup>59</sup> while the remaining firms produce both WMMP and MDF MMP. Of the four firms that produce both WMMP and MDF MMP, two share equipment and/or employees.

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<sup>59</sup> As these firms are producers of out-of-scope products, their data are only presented in this section and appendix G.

**Table I-7****WMMP: U.S. producers', U.S. importers' and U.S. purchasers' comparisons of in-scope WMMP vs. out-of-scope MDF MMP**

Factor	Count of firms			
	Fully	Mostly	Somewhat	Never
<b>U.S. producers</b>				
In-scope WMMP vs out-of-scope MDF MMP.-- Physical characteristics and end uses	1	1	12	3
Interchangeability	---	3	11	3
Manufacturing facilities and production employees	---	3	10	3
Channels of distribution	8	5	3	1
Customer and producer perceptions	---	3	10	3
Price	---	---	10	6
<b>U.S. importers</b>				
In-scope WMMP vs out-of-scope MDF MMP.-- Physical characteristics and end uses	2	8	16	3
Interchangeability	2	12	13	2
Manufacturing facilities and production employees	---	6	12	5
Channels of distribution	16	5	6	---
Customer and producer perceptions	---	10	15	1
Price	---	2	16	8
<b>U.S. purchasers</b>				
In-scope WMMP vs out-of-scope MDF MMP.-- Physical characteristics and end uses	1	8	13	5
Interchangeability	2	6	16	3
Manufacturing facilities and production employees	1	2	8	5
Channels of distribution	11	6	5	3
Customer and producer perceptions	---	3	17	5
Price	1	2	10	14

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

**Table I-8****WMMP: U.S. producers manufacturing facilities for WMMP and out-of-scope MDF MMP, 2019**

	Number of firms (count)
Only had WMMP production (i.e., firm does not produce MDF MMP)	11
Only produced MDF MMP (i.e., firm does not produce WMMP)	4
Produced both MDF MMP and WMMP.-- Using the same machinery/employees	2
Using different machinery/employees	2

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

**Table I-9****WMMP: U.S. producers' U.S. shipments average unit value of in-scope WMMP and out-of-scope MDF MMP, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Unit Value (dollars per board foot)</b>				
U.S. producers' U.S. shipments.-- In-scope WMMP	2.07	2.13	2.21	2.23	2.19
Out-of-scope MDF MMP	1.26	1.27	1.27	1.28	1.25

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

**Table I-10****WMMP: U.S. producers' U.S. shipments of in-scope WMMP and out-of-scope MDF MMP, by channels of distribution, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of U.S. shipments (percent)</b>				
U.S. producers' U.S. shipments of WMMP.-- to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. producers' U.S. shipments of MDF MMP.-- to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

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



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

### U.S. market characteristics

WMMP are used primarily in residential construction for door and window framing and decorating transitions between floors, walls, windows, and doors. WMMP can be sold as “raw” (not primed) or coated (primed and ready for painting), and may be finger-jointed, made with solid wood (a higher-end product), or made with other forms of wood, such as laminated veneer lumber (“LVL”).<sup>1</sup> Several substitutes were reported for WMMP, including MMP made from medium-density fiberboard (“MDF”), which is primarily substituted in decorative indoor applications, and MMP made from polyvinyl chloride (“PVC”) and other composites, which are more commonly used as substitutes in outdoor applications.<sup>2</sup>

U.S. demand for WMMP is driven primarily by the amount of residential construction in the United States. The domestic market for WMMP is supplied by numerous U.S. producers, imports from China, and imports from Brazil, Chile, and other nonsubject countries. Market participants generally described U.S. and Chinese product as interchangeable, rated price and quality as important purchasing factors, and rated U.S., Chinese, and Brazilian product as comparable on most factors. However, some purchasers expressed preferences for WMMP from China, Brazil, and other nonsubject sources for reasons related to quality and/or availability.

Apparent U.S. consumption of WMMP increased during January 2017-June 2020. Overall, apparent U.S. consumption was \*\*\* percent higher in 2019 than in 2017, and was \*\*\* percent higher in January-June 2020 than in January-June 2019. U.S. producers’ market share decreased during 2017-2019, while the market share of Chinese product increased; U.S. producers’ U.S. shipments decreased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2019, while the share of importers’ U.S. shipments of WMMP from China increased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2019.<sup>3</sup>

When asked if there had been any significant changes in the product range, product mix, or marketing of WMMP since January 2017, firm responses were mixed; most U.S. producers (8

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<sup>1</sup> Conference transcript, p. 65 (Procton).

<sup>2</sup> Hearing transcript, pp. 38 (Procton), 47 (Trapp), and 80 (Gartman).

<sup>3</sup> The share of importers’ U.S. shipments from Brazil increased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2019, and the share of importers’ U.S. shipments from Chile decreased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2019. The share of importers’ U.S. shipments from all other sources increased from \*\*\* percent of apparent U.S. consumption in 2017 to \*\*\* percent in 2019.

of 15 firms) reported that there had, while most (24 of 41) importers reported that there had not. Most of the firms reporting changes reported increases in the demand for particular product types, including composite materials, MDF, painted/primed and gesso-coated product, engineered product, and S4S product.<sup>4</sup> Several firms also noted a trend away from “traditional” colonial styles towards Craftsman style product, while one firm, \*\*\*, indicated that style tastes fluctuate based on popular trends in the marketplace. A few firms, (including \*\*\*) reported that producers of door frames and S4S product in Chile and China, in particular, were more capable than domestic firms of large-scale runs, while a few other firms (including \*\*\*) indicated that the quality of WMMP in China is superior to other sources.

## U.S. purchasers

The Commission received 47 usable questionnaire responses from firms that had purchased WMMP during January 2017-June 2020.<sup>5 6 7</sup> Twenty-three of the responding

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<sup>4</sup> “S4S” means that the product is surfaced (i.e. finished) on all four sides.

<sup>5</sup> The following firms provided purchaser questionnaire responses: \*\*\*.

<sup>6</sup> Of the 47 responding purchasers, 35 purchased the domestic WMMP, 29 purchased imports of the merchandise from China, 29 purchased imports of the merchandise from Brazil, and 23 purchased imports of WMMP from Chile. Twenty-three firms purchased WMMP from other sources, including Argentina (10 firms); Mexico (9 firms); Indonesia (8 firms); Canada (6 firms); Malaysia (5 firms); Vietnam (3 firms); New Zealand (2 firms); and Finland, Peru, Russia, Sweden, and Uruguay (1 firm each). Ten firms also purchased WMMP from unknown sources.

<sup>7</sup> Seven of 45 responding purchasers are related to firms that import WMMP into the United States or that export WMMP to the United States. Those firms are: \*\*\*.

Eight of 45 responding purchasers are related to firms which produce WMMP, either domestically or abroad. Those firms are: \*\*\*

(continued...)

purchasers are distributors, 12 are end users/manufacturers, 9 are end users/door frame manufacturers, 8 are retailers, and 4 are contractors/home builders. Seven firms also identified as “other” types of firms, including a wholesaler, a pre-hung door assembler, a manufacturers’ representative, a remanufacturer, and a broker. In general, responding U.S. purchasers were located in all regions of the contiguous United States, with most concentrated in the Midwest (15 firms) and Southeast (14 firms).<sup>8</sup> The responding purchasers generally represented firms involved in the construction industry, and reported selling to a variety of different types of customers, including home improvement retailers (14 firms), home builders/contractors and/or installers (12 firms), lumber yards (10 firms), consumers/homeowners (8 firms), distributors and door and/or window manufacturers (6 firms each), pro dealers and travel trailer/RV companies (3 firms each), and specialty millwork shops (1 firm). The largest purchaser/importers of WMMP included \*\*\*, which accounted for \*\*\* percent, \*\*\* percent, and \*\*\* percent, respectively, of all reported purchases and imports of WMMP in 2019.<sup>9 10</sup>

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\*\*\*.

<sup>8</sup> Seven firms also were located in the Northeast, 5 were in the Pacific Coast, 4 were in the Central Southwest, and 1 was in the Mountain region.

<sup>9</sup> The largest purchasers of domestic WMMP in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported domestic purchases that year. The largest purchasers/importers of WMMP from China in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases/imports of Chinese WMMP that year. The largest purchasers/importers of WMMP from Brazil in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases/imports of Brazilian WMMP that year. The largest purchasers/importers of WMMP from Chile in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases/imports of Chilean WMMP that year. The largest purchasers/importers of WMMP from all other known sources in 2019 were \*\*\*, which accounted for \*\*\* percent and \*\*\* percent, respectively, of reported purchases/imports from all other known sources that year.

<sup>10</sup> Two firms, \*\*\*, reported purchase data in lineal feet instead of board feet (as requested). These data were converted to board feet by converting lineal feet to meters and multiplying by 0.65.

Four firms (\*\*\*) reported that they do not maintain records that would allow them to report purchases based on board footage, and instead reported their purchase data in dollars. \*\*\* reported the following purchase totals for the following periods: \*\*\*. \*\*\*

(continued...)

## Channels of distribution

Most WMMP shipments in the U.S. market are sold to distributors. U.S. producers sold a roughly equivalent amount to distributors and end users during 2017 and 2018, then a slight majority to distributors thereafter (table II-1). U.S. finishers sold almost half of their WMMP to end users in 2017 and then a majority to end users thereafter. U.S. importers of WMMP from China, Brazil, Chile, and all other sources sold their WMMP mainly to distributors.

**Table II-1**  
**WMMP: U.S. producers' and importers' U.S. shipments, by sources and channels of distribution, January 2017-June 2020**

Item	Period				
	Calendar year			January-June	
	2017	2018	2019	2019	2020
<b>Share of reported shipments (percent)</b>					
<b>U.S. producers' U.S. shipments of WMMP to:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***
<b>U.S. finishers' U.S. shipments of WMMP to:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***
<b>U.S. importers' U.S. shipments of WMMP from China to:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***
<b>U.S. importers' U.S. shipments of WMMP from Brazil to:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***
<b>U.S. importers' U.S. shipments of WMMP from Chile to:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***
<b>U.S. importers' U.S. shipments of WMMP from all other countries:</b>					
Distributors	***	***	***	***	***
Retailers	***	***	***	***	***
End users	***	***	***	***	***

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

reported the following purchase totals for the following periods: \*\*\*. \*\*\* reported the following purchase totals for the following periods: \*\*\*. \*\*\* reported the following purchase totals for the following periods: \*\*\*.

## Geographic distribution

In general, U.S. producers and importers of WMMP from China reported selling to all regions in the contiguous United States (table II-2). Importers of WMMP from Brazil also reported selling to all regions. For U.S. producers, 4.0 percent of sales were within 100 miles of their production facilities, 56.8 percent were between 101 and 1,000 miles, and 39.2 percent were over 1,000 miles. Importers of WMMP from China sold 65.6 percent within 100 miles of their U.S. points of shipment, 27.8 percent between 101 and 1,000 miles, and 6.6 percent over 1,000 miles.

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

Region	U.S. producers	Importers	
		China	Brazil
Northeast	11	17	19
Midwest	13	16	15
Southeast	12	22	24
Central Southwest	9	14	21
Mountain	11	13	14
Pacific Coast	13	16	9
Other	2	4	1
All regions (except Other)	8	9	6
Reporting firms	15	23	28

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

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

## Supply and demand considerations

### U.S. supply

Table II-3 provides a summary of the supply factors regarding WMMP from U.S. producers, subject foreign producers in China, and nonsubject foreign producers in Brazil. In general, U.S. producers and foreign producers in China reported decreases in capacity utilization, and while U.S. producers mostly reported decreases in overall capacity, the foreign producers in China reported increases in overall capacity. U.S. producers also reported mostly home market shipments, while producers in China reported much larger export shipments.

**Table II-3**

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

Country	Capacity (1,000 board feet)		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”
U.S. producers	***	***	***	***	***	***	***	***	4 of 16
U.S. finishers	***	***	***	***	***	***	***	***	
China	***	***	***	***	***	***	***	***	0 of 6
Brazil	***	***	***	***	***	***	***	***	1 of 12
All foreign producers	***	***	***	***	***	***	***	***	1 of 18

Note: Responding U.S. producers are believed to account for the majority of U.S. production of WMMP in 2019. Responding foreign producer/exporter firms accounted for approximately \*\*\* percent of U.S. imports of WMMP from China and \*\*\* percent of U.S. imports of WMMP from Brazil during 2019. 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 WMMP have the ability to respond to changes in demand with at least moderate-to-large changes in the quantity of shipments of U.S.-produced WMMP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the availability of unused capacity and some availability of inventories among U.S. finishers. Factors mitigating U.S. producers’ 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 decreased by \*\*\* percentage points between 2017 and 2019, driven primarily by a decrease in production. Overall capacity and production both decreased from 2017 to 2019, by \*\*\* percent and \*\*\* percent, respectively.<sup>11</sup> U.S. producers’ capacity utilization was \*\*\* percentage points higher during January-June 2020

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<sup>11</sup> Among the responding U.S. producers, eight firms reported a decrease in capacity utilization and seven reported an increase in capacity utilization. Among the firms with decreased capacity utilization, the average percentage point drop was 23.8, while the average percentage point drop among the firms with increased capacity utilization was 10.8. The two U.S. producers representing the largest share of production in 2019, \*\*\*, both reported \*\*\*.

than the same period in 2019.<sup>12</sup> U.S. finishers' capacity utilization remained relatively constant from 2017 to 2019, at between \*\*\* percent (2019) and \*\*\* percent (2018). U.S. finishers' overall capacity increased by \*\*\* percent from 2017 to 2019, while their overall production increased by \*\*\* percent.<sup>13</sup> The ratio of U.S. producers' inventories to total shipments increased from \*\*\* percent in 2017 to \*\*\* percent in 2019, and the ratio of U.S. finishers' inventories to total shipments increased from \*\*\* in 2017 to \*\*\* percent in 2019. U.S. producers and finishers reported that less than \*\*\* percent of their total shipments in 2019 were exported.<sup>14</sup> Four of 16 responding U.S. producers and finishers reported an ability to shift production to or from WMMP and other products, while 12 reported that they cannot shift their production. The other products that can reportedly be produced on the same equipment as WMMP are wood window parts, beehive components, single pieces of non-finger-jointed lumber (solid blanks and cut stock), double hung or casement window sashes, countertops, rough lineal blanks, and custom manufactured pieces using other hardwood species (including but not limited to oak, maple, birch, mahogany, and poplar). The factors affecting U.S. producers' ability to shift production include equipment limitations, lower demand for other (out of scope) products, material costs, and less efficient and cost-effectiveness of custom manufacturing.

### **Subject imports from China<sup>15</sup>**

Based on data made available in both the preliminary and final phase investigations, producers of WMMP from China are believed to have the ability to respond to changes in demand with at least moderate-to-large changes in the quantity of shipments of WMMP to the U.S. market. The main contributing factors to this degree of responsiveness of supply are the moderate levels of capacity utilization, increasing overall capacity and production, and the

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<sup>12</sup> Nine firms, \*\*\*, reported higher levels of capacity utilization during January-June 2020 compared to January-June 2019, for an average increase of \*\*\* percentage points during this time. Six firms reported lower levels of capacity utilization during January-June 2020 compared to January-June 2019, for an average decrease of \*\*\* percentage points.

<sup>13</sup> Most (between \*\*\* and \*\*\* percent) of U.S. finishers' production came from blanks from nonsubject sources during 2017-19, while the amount of production using domestic blanks decreased during this time.

<sup>14</sup> Five firms reported that their principal export market was Canada, and one reported that it was Japan.

<sup>15</sup> Six Chinese producers/exporters provided questionnaire responses in these final phase investigations, though only two of them provided capacity and production data. In the preliminary phase, 22 Chinese producers/exporters provided questionnaire responses, and 16 of them provided capacity and production data.

ability to shift some shipments from their home market and/or alternative export markets. Factors mitigating Chinese producers' responsiveness of supply include the limited availability of inventories and a limited ability to shift production to or from alternate products. However, Chinese producers demonstrated the ability to raise capacity substantially during 2016-2018.<sup>16</sup> Moreover, the Commission does not have data from Chinese producers that produced most of the WMMP shipped to the United States, and so the Chinese industry may have more ability to respond than the data collected indicate.<sup>17</sup>

In this final phase of the investigations, Chinese producers reported substantially less capacity and production than in the preliminary phase investigations because fewer Chinese producers responded to the Commission's foreign producer questionnaire. Based on data collected in the preliminary and final phases of the investigations, however, Chinese producers generally reported moderate levels of capacity utilization, with increasing levels of overall capacity and production. Chinese producers reported inventories in the preliminary phase that decreased from \*\*\* percent of their total shipments in 2016 to \*\*\* percent in 2018. In the preliminary phase, only one Chinese producer (\*\*\*) reported an ability to shift production to or from WMMP and other products using the same equipment, citing bamboo as the other WMMP product it could produce, which is in scope; no Chinese producer reported that it could switch production in the final phase.

### **Imports from nonsubject sources**

Nonsubject imports accounted for \*\*\* percent of all reported imports in 2019, a decrease of 3.1 percentage points from 2017. Brazil accounted for \*\*\* percent of reported imports in 2019 (down from \*\*\* percent in 2017), Chile accounted for \*\*\* percent of all reported imports in 2019 (down from \*\*\* percent in 2017), and all other sources accounted for \*\*\* percent in 2019 (up from \*\*\* percent in 2017). Aside from Brazil and Chile, firms reported importing from the following nonsubject countries: Indonesia (listed by 8 firms); Argentina and Mexico (7 firms each); Malaysia (6 firms); Canada (5 firms); Vietnam (3 firms); Italy, the Netherlands, New Zealand, and Spain (2 firms each); and Estonia, Finland, Germany, Lithuania, and Uruguay (1 firm each).

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<sup>16</sup> Investigation Nos. 701-TA-636 and 731-TA-1469-1470 (Preliminary): Wood Mouldings and Millwork Products from Brazil and China, Confidential Report, INV-SS-011, February 14, 2020 ("Preliminary confidential report"), pp. II-6-7; and Wood Mouldings and Millwork Products from Brazil and China, Inv. Nos. 701-TA-636 and 731-TA-1469-1470 (Preliminary), USITC Publication 5030, March 2020 ("Preliminary publication"), p. II-7.

<sup>17</sup> For more on the industry in China, see part VII.



## Supply constraints

U.S. producers, importers, and purchasers were asked whether they or another firm had refused, declined, or been unable to supply WMMP since January 1, 2017.<sup>18</sup> Most U.S. producers (9 of 15 firms) reported that they had not experienced any such supply constraints, while slightly more than half of responding importers (21 of 41 firms) and most purchasers (26 of 47) reported that they had experienced supply constraints. The most frequently noted constraint – highlighted by 4 U.S. producers, 7 importers, and 14 purchasers – was the COVID-19 pandemic.<sup>19</sup> Firms generally reported that more employee COVID-related leave led to some production slowdowns and limited supply and/or slower lead times due to a disruption of the global supply chain.<sup>20</sup> Among U.S. producers, other reported supply constraints included limited capacities as they ramped up production and trained new hires (two firms), limited cash flow and inventory, an inability to compete with low-priced imports from China and Brazil, and an unwillingness among domestic sawmills to supply their competitors due to a desire to keep material for their own internal production (one firm each).<sup>21</sup> Among importers, other reported supply constraints included the preliminary AD/CVD duties and an increase in demand leading to shortages, a lack of raw material availability, labor related problems, a factory shutdown in China due to pollution, the rainy season in Mexico, a decrease in demand for imported product due to performance fears, and customers being placed on allocation to prevent runs on inventory resulting from uncertain market conditions. Among purchasers, other reported

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<sup>18</sup> Examples include placing customers on allocation or “controlled order entry,” declining to accept new customers or renew existing customers, delivering less than the quantity promised, being unable to meet timely shipment commitments, etc.

<sup>19</sup> Two firms, \*\*\*, indicated specifically that they were considered “essential businesses,” with one (\*\*\*) reporting that it did not experience any shutdown periods as a result of the COVID-19 pandemic and the other (\*\*\*) reporting that while “the company did incur limited instances of being unable to supply WMMP for a short-term period of time, it was not seen as significant.”

<sup>20</sup> Woodgrain stated that the COVID-19 pandemic had a negative impact on its ability to increase production, keep existing employees working, and hire new employees in the near-term. Hearing transcript, pp. 93-94 (Easton).

<sup>21</sup> As discussed in part III, \*\*\* reported closing its \*\*\* production facility in \*\*\* due to \*\*\*, and Woodgrain and Endura reported plant closings in 2016 and 2018, respectively, which resulted in employee layoffs. In addition, Endura reported reducing production at its Nacogdoches, Texas facility due to lack of orders, but maintains that the Sparta mill and equipment is still in place and can resume operations. Sierra Pacific also reported production curtailments, including temporary layoffs of 1-4 weeks at its Corning, California plant in March 2018 and a 25 percent reduction of millwork capacity at its Red Bluff, California plant in April 2018. Conference transcript, pp. 29-30 (Carroll), 35 (Easton), and 40-41 (Procton).

supply constraints included an increase in demand and prices leading to shortages, overcapacity among domestic mills, natural disasters, labor-related issues, the preliminary AD/CVD duties, and the lack of availability of finger-joined jambs.

When purchasers were asked if the availability of supply of U.S. produced WMMP, subject imports, and nonsubject imports had changed since January 2017, most (31 of 47 firms) reported that the availability of domestic product had changed and just under half (18 of 37 firms) reported that the availability of subject imports had changed. Most (16 of 25 firms) reported that the availability of nonsubject imports had not changed. In reference to the availability of domestic WMMP, almost all responding firms indicated that domestic supply was tighter due to an increase in demand for U.S.-produced product, less availability of imported product, and/or little available domestic capacity.<sup>22</sup> Firms reported that this has resulted in some combination of higher prices, extended lead times, and/or lower quality. Among the firms reporting a change in the availability of subject imports, the vast majority of firms reported that there was less availability of WMMP due to the preliminary AD/CVD duties and the COVID-19 pandemic, and that these led to material shortages, higher prices, and longer lead times.<sup>23</sup>

### **New suppliers**

Most purchasers (38 of 47 firms) indicated that no new suppliers had entered the U.S. market since January 1, 2017. The nine firms reporting new suppliers named the following as new market entrants: Cotopaxi (Ecuador), CTI (United States), Go Green Solutions (United States), PT Corinthian (an Indonesian subsidiary of Jeld-Wen), and Zebra Pacific (United States) (all cited by one firm each). One firm each also named “numerous firms throughout Brazil and Asia,” “Chinese firms,” and, simply, “numerous.”

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

Based on available information, the overall demand for WMMP is likely to experience moderate changes in response to changes in price. The main contributing factor to this level of demand responsiveness is the availability of substitute products. While WMMP represents a very small share of the cost of building a new home, it can represent a somewhat larger share of the cost of a remodel, depending on the size of the project. For projects in which MDF MMP is a suitable substitute, such as indoor applications, demand responsiveness is likely to be

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<sup>22</sup> One firm, \*\*\*, reported that Woodgrain had expanded its domestic capacity.

<sup>23</sup> Two firms, \*\*\*, reported that there was an increase in the availability of subject imports, with \*\*\* stating that it put downward pressure on WMMP prices.

higher due to the comparatively lower cost of most MDF MMP. For projects in which MMP made from PVC and other composites are suitable substitutes, such as outdoor applications, demand responsiveness may be lower.

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

WMMP is used in construction, especially residential construction, in both new homes and remodeled homes. While WMMP can be a larger share of some products that are made with WMMP (such as door frames), WMMP represents a very small share of the total cost of building a home.

### **Business cycles**

Most U.S. producers (11 of 14 firms) and importers (24 of 41 firms) indicated that the WMMP market was subject to business cycles, while most purchasers (29 of 46 firms) indicated that it was not. Specifically, firms reported that the WMMP market follows seasonal construction cycles, with strongest demand in the spring and fall months and weakest demand in the winter months. Importers \*\*\* reported that imports of WMMP from China are lower during the Chinese New Year (January-February), with prolonged idling of plants during this time. \*\*\* also highlighted interest rates as a contributing factor to business cycles.<sup>24</sup>

Five of 14 U.S. producers, 5 of 41 importers, and 4 of 46 purchasers indicated that the market was subject to distinct conditions of competition. Specifically, \*\*\* reported that there was more market demand for gesso-coated and LVL millwork products, and \*\*\* cited an increase in Chinese and Brazilian imports, changes in the market price for raw materials, natural disasters, and plant closures and openings as conditions of competition distinct to the WMMP market. Importer \*\*\* cited competition from the pulp and paper markets, as well as substitutes such as MDF and PVC, as distinct conditions of competition, and importer \*\*\* stated that foreign currency fluctuations and global ocean freight costs have an impact on the cost of imported WMMP. Purchasers cited mill shutdowns, commodity lumber price fluctuations, tariffs and duties, freight and logistics, and foreign competition as conditions of competition distinct to the WMMP market.

Nine of 13 U.S. producers, 12 of 27 importers, and 12 of 27 purchasers indicated that there have been changes in the business cycles and/or conditions of competition for WMMP since 2017. Several firms highlighted the COVID-19 pandemic as a change in the conditions of

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<sup>24</sup> See figure II-2 for interest rate trends in the United States since January 2017.

competition. Several firms (including \*\*\*) also cited an increase in volume of imports from China and Brazil as a change in the conditions of competition, while others cited the introduction of the preliminary AD/CVD duties, section 301 tariffs, and increased competition from nonsubject sources due to the AD/CVD duties. A few firms (including \*\*\*) highlighted an increase in the use of substitute products such as MMP made from MDF, PVC, and gesso-coated LVL as a change, while others reported that natural disasters (\*\*\*) and winter weather in 2018-19 (\*\*\*) were new conditions in the WMMP market. Two firms (\*\*\*) stated that increased prices were a change in the WMMP market, while one firm (\*\*\*) cited supply shortages among domestic mills as a change, and two firms (\*\*\*) cited consolidation within the building products industry.

### **Substitute products**

Most firms (including 11 of 15 U.S. producers, 29 of 39 importers, and 24 of 46 purchasers) reported that there are substitutes for WMMP. The most commonly reported substitutes were MMP made from MDF (cited by 45 firms), PVC (cited by 29 firms), and composites (cited by 16 firms). In general, these substitutes are used for the same end uses as WMMP, though MDF MMP is a more common substitute for indoor decorative applications, whereas MMP made from PVC and other composites are mostly substituted in outdoor applications. Other named substitutes were MMP made from LVL (cited by 5 firms), plaster, vinyl, and wood (cited by 2 firms each), and extruded moulding, fiberglass, injection moulding, lumbercore, metal, particle board, plastic, polyurethane, and synthetics (cited by 1 firm each).

Most firms indicated that changes in the price of MDF MMP do not affect the price of WMMP. All responding firms indicated that MDF MMP is typically less expensive than WMMP, with one firm citing a cost savings of 20-30 percent for MDF MMP compared to WMMP. Other firms reported that MDF MMP has gained market share (comprising up to half of some markets), but that it is used mostly in interior applications, such as mouldings and trim.<sup>25</sup>

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<sup>25</sup> Petitioner Endura testified that it manufactures exterior door frames, and that MDF is not used in such applications. Petitioner Woodgrain Distribution testified that its sales of MDF MMP (as well as WMMP) increased during the period of investigation. Hearing transcript, pp. 97 (Easton), 115 (Procton).

Respondent Shamrock testified that “over the last several years, MDF products have become significantly more popular in the U.S. market, particularly in the West Coast, where they account for perhaps 80 percent or more of the moulding market.” Metrie testified that there has been “significant

*(continued...)*

Another firm noted that WMMP is often stained, whereas MDF MMP is a painted product.<sup>26</sup> Most firms also indicated that changes in the prices of MMP made from PVC/composites do not affect the price of WMMP. MMP made from PVC and composites are typically higher in price than WMMP, with one firm stating that composites are 25 percent higher in price.<sup>27</sup> PVC and composites are used mostly in exterior applications, such as exterior trim, moulding, frames, and porch posts due to their superior resistance to rot, termites, and other environmental factors.

### **Demand trends**

Demand for WMMP is driven by construction spending, both for new homes and remodels. As shown in figure II-1, construction spending has increased overall since January 2017, with slowdowns in 2018 and the second quarter of 2020. Both residential and nonresidential construction spending increased from January 2017 to December 2019, leading to an overall increase in total construction spending during this time of 11.7 percent. Between December 2019 and June 2020, residential, nonresidential, and total construction spending decreased. By October 2020, residential construction spending had increased by 11.4 percent (from December 2019), while nonresidential construction spending decreased by 4.6 percent.

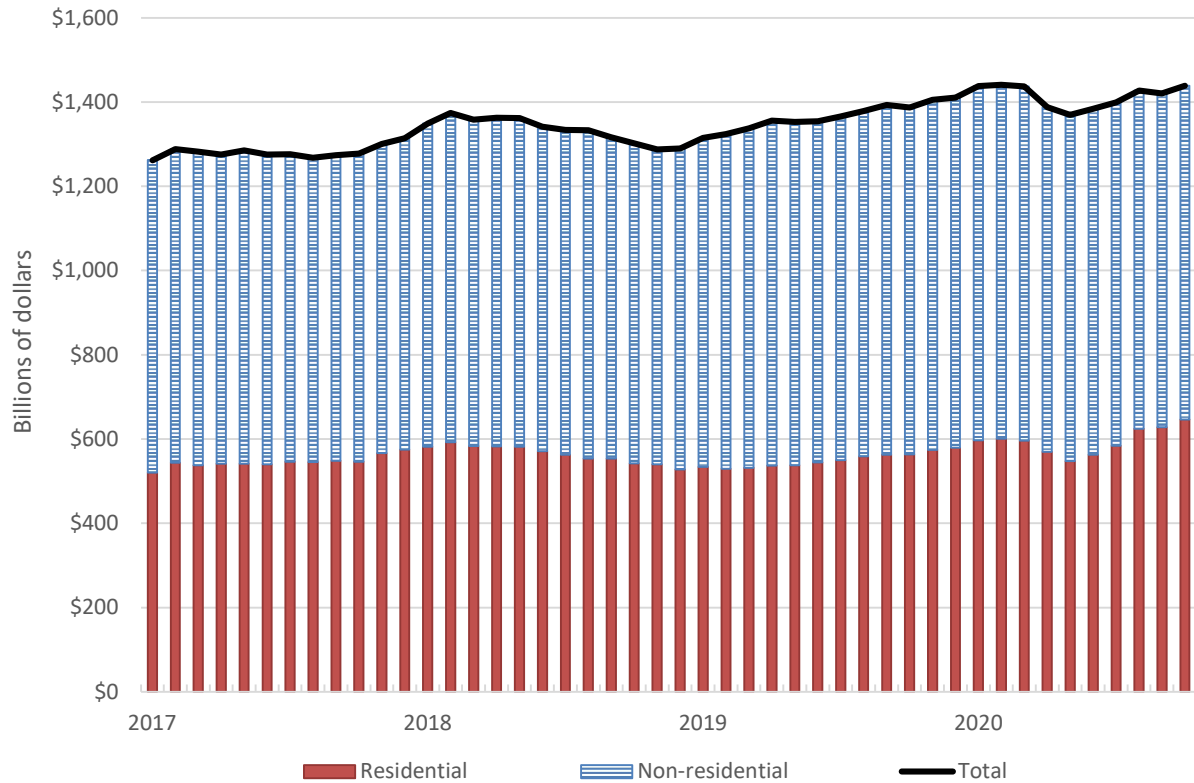
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growth in demand for MDF in the U.S. market” and that MDF MMP “are close substitutes in many areas.” Hearing transcript, pp. 158 (Burke), 164 (Ammons). \*\*\*. See also ABIMCI’s posthearing brief, Responses to Commissioner Questions, pp. 25-26 and Attachments B, C, and D.

<sup>26</sup> See also ABIMCI’s prehearing brief, pp. 36-37.

<sup>27</sup> Cascade Wood Products testified that PVC MMP are “quite a lot more expensive than the wood counterpart.” Hearing transcript, p. 119 (Moore); Petitioners’ posthearing brief, Exhibit 1 (Answers to Commissioner Questions), pp. 31-33.

**Figure II-1**  
**Construction spending: Residential, nonresidential, and total construction spending, billions of dollars, seasonally adjusted annual rate, monthly, January 2017-October 2020**



Source: U.S. Bureau of Labor Statistics via the Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/categories/32436>, retrieved December 30, 2020.

As shown in figure II-2, the 30-year fixed rate mortgage average in the United States increased intermittently between the first week of January 2017 and mid-November 2018, reaching a high of 4.9 percent, then dropped to a low of 2.7 percent in the last week of December 2020.

**Figure II-2**

**Mortgage interest rate: 30-year fixed rate mortgage average in the United States, percent, not seasonally adjusted annual rate, weekly, January 2017-December 2020**



Source: Freddie Mac via the Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/graph/?g=NUh>, retrieved December 30, 2020.

Most firms reported an increase in U.S. demand for WMMP since January 2017 (table II-4). Most firms also reported an increase in demand for WMMP outside the United States since January 2017, as well as demand for the end use products made with WMMP.

**Table II-4**

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

Item	Increase	No change	Decrease	Fluctuate
<b>Demand in the United States</b>				
U.S. producers	11	---	1	3
Importers	26	4	2	6
Purchasers	33	1	2	6
<b>Demand outside the United States</b>				
U.S. producers	3	1	---	2
Importers	8	2	3	3
Purchasers	8	3	---	3
<b>Demand for end use products</b>				
Purchasers	21	3	2	11

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

Several firms reported that that the increase in demand during the first half of 2020 is at least partially due to an increase in remodeling activity tied to the COVID-19 pandemic. Home improvement retailers The Home Depot and Lowe’s, for example, reported that they saw significant sales growth beginning in the last three weeks of the first quarter of 2020 (Home Depot) or the second quarter of 2020 (Lowe’s).<sup>28</sup>

With regards to the most frequently mentioned substitute for WMMP, MDF MMP, most firms also reported that demand has increased since January 1, 2017 (table II-5).

**Table II-5**  
**MDF MMP: Firms’ responses regarding U.S. demand and demand outside the United States**

Item	Increase	No change	Decrease	Fluctuate
<b>Demand in the United States</b>				
U.S. producers	6	1	---	2
Importers	19	2	---	4
Purchasers	25	4	1	1
<b>Demand outside the United States</b>				
U.S. producers	1	---	---	1
Importers	9	---	1	4
Purchasers	6	2	---	1

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

## Substitutability issues

The degree of substitution between domestic and imported WMMP depends upon such factors as relative prices, quality (e.g., grade standards, defect rates, etc.), and conditions of sale (e.g., price discounts/rebates, lead times between order and delivery dates, reliability of supply, product services, etc.). Based on available data, staff believes that there is at least a moderate-to-high degree of substitutability between domestically produced WMMP and WMMP imported from China. Market participants generally described U.S. and subject product as interchangeable, rated price and quality as important purchasing factors, and rated U.S. and Chinese product as comparable on most factors. However, some purchasers expressed preferences for Chinese product for reasons related to quality and/or availability.

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<sup>28</sup> ABIMCI argues that “demand for MMP of all types is likely to remain strong... as pandemic-related stay-at-home orders and work-from-home policies are likely to remain in place for the remainder of 2020 and into mid-2021...” ABIMCI’s prehearing brief, pp. 23-24, Exhibit 3.

As noted above, Petitioners argue that “COVID-related effects on consumption are likely temporary, and demand in the U.S. market for WMMP is expected to decrease in the imminent future.” Petitioners’ prehearing brief, pp. 35-36; Hearing transcript, pp. 28 (Carroll), 32 (Easton).



## Lead times

WMMP is primarily produced-to-order. U.S. producers reported that 94.0 percent of their commercial shipments were produced-to-order in 2019 with lead times averaging 29 days, and the remaining 6.0 percent came from inventories, with lead times averaging 7 days. Importers of WMMP from China reported that 52.4 percent of their commercial shipments were produced-to-order in 2019 (with lead times averaging 98 days), while 35.3 percent came from inventories (with an average lead time of 9 days) and the remaining 12.3 percent came from the foreign manufacturers' inventories (with an average lead time of 74 days).

## Knowledge of country sources

Forty purchasers indicated they had marketing/pricing knowledge of domestic product, 31 of product from China, 32 of product from Brazil, 30 of product from Chile, and 23 of product from other nonsubject countries. The other nonsubject countries that purchasers reported marketing/pricing knowledge of included Argentina (11 firms); Indonesia (9 firms); Canada (8 firms); Mexico (7 firms); Malaysia and Vietnam (6 firms each); Cambodia, New Zealand, Russia, and Uruguay (2 firms each); and Australia, Estonia, France, Germany, Latvia, Lithuania, Paraguay, Peru, Spain, Thailand, Ukraine, and the United Kingdom (1 firm each).

As shown in table II-6, most purchasers and their customers either sometimes or never make purchasing decisions based on the producer or country of origin. A plurality of purchasers reported sometimes making purchasing decisions based on the producer, while most reported that they never make purchasing decisions based on the country of origin. Most purchasers reported that their customers never make purchasing decisions based on the producer or country of origin.

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

<b>Purchaser/customer decision</b>	<b>Always</b>	<b>Usually</b>	<b>Sometimes</b>	<b>Never</b>
Purchaser makes decision based on producer	9	5	18	15
Purchaser's customers make decision based on producer	3	2	12	23
Purchaser makes decision based on country	3	4	13	26
Purchaser's customers make decision based on country	2	1	10	27

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

Of the nine purchasers that reported that they always make decisions based the manufacturer, most firms cited quality, performance, and delivery as reasons. For the firms reporting that they either usually or sometimes make decisions based the manufacturer, quality was also the most frequently cited reason, with some firms indicating that some producers

make WMMP of better and more reliable quality.<sup>29</sup> One firm, \*\*\*, which reported sometimes making decisions based on the producer, reported that it “tries to buy in the United States only, but {it has} to go to China to get gesso-coated product.”<sup>30</sup> For the firms that reported that their customers either always, usually, or sometimes make purchasing decisions based on the manufacturer, most also cited reasons related to quality and reliability.

For the firms that reported either always, usually, or sometimes making decisions based on the country of origin, the reasons were varied, and included quality, availability of supply, price, lead time, consistency, and species differences. \*\*\* reported that quality and material can be superior for some products from specific countries, but did not specify which countries. Two firms, \*\*\*, reported that the quality of WMMP from overseas is better than U.S. product, with \*\*\* (which reported always making purchasing decisions based on the country of origin) stating that it purchases from Brazil for reasons related to quality and availability of supply. \*\*\* reported always purchasing domestic pine mouldings because it (and its customers) require that particular wood species. For the firms reporting that their customers either always, usually, or sometimes make decisions based on the country of origin, the reasons were also varied. \*\*\* reported that some geographical regions prefer product from certain countries, while \*\*\* stated that some customers prefer radiata pine over other species.<sup>31</sup> \*\*\* reported

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<sup>29</sup> None of these firms listed specific producers.

<sup>30</sup> U.S. producers reported that \*\*\* percent of their sales of WMMP in 2019 were offered with an extruded gesso coating, while importers reported that \*\*\* percent of their Chinese WMMP were and \*\*\* percent of their Brazilian WMMP were.

When asked why domestic producers have not produced more gesso-coated product, Woodgrain stated that “it is not conducive to job shop manufacturing, and so much of our orders in the U.S. have been small short runs. The gesso process is much more time-consuming to set up and to change over between profiles, and when you look at our order patterns in many of our domestic facilities, it just is not practical to manufacture with gesso.” Woodgrain stated that it uses gesso at three of its facilities, however, and that gesso is conducive to long runs. Hearing transcript, pp. 60-62 (Easton); Petitioners’ posthearing brief, Exhibit 1 (Answers to Commission Questions), pp. 65-68.

<sup>31</sup> Originally native to the Central Coast of California and Mexico (Guadalupe Island and Cedros island), radiata pine is now the most widely cultivated pine in the world, valued for its rapid growth and desirable lumber and pulp qualities. Common uses for radiata pine include veneer, plywood, paper (pulpwood), boxes/crates, and construction lumber. It is grown in Australia, the British Isles, Chile, New Zealand, South Africa, Spain, and domestically in Maui, Hawaii, though most commercial radiata pine lumber is from plantations in Chile, New Zealand, Australia and South Africa. USDA, U.S. Forest Service, Fire Effects Information System (FEIS), *Pinus radiata*, <https://www.fs.fed.us/database/feis/plants/tree/pinrad/all.html>, accessed November 15, 2020; The Wood Database, *Radiata Pine*, <https://www.wood-database.com/radiata-pine/>, accessed November 15,

(continued...)

that its customers viewed Chinese WMMP as “the highest quality and most requested product {it} had prior to the preliminary AD/CVD ruling.”

## Factors affecting purchasing decisions

The most often cited top three factors firms consider in their purchasing decisions for WMMP were quality (cited by 44 firms), price/cost (40 firms), and availability (21 firms) (table II-7). Quality was the most frequently cited first-most important factor (cited by 29 firms), followed by price/cost (8 firms); quality and price/cost were the most frequently reported second-most important factors (cited by 14 firms each), followed by availability (8 firms); and price/cost was the most frequently reported third-most important factor (cited by 18 firms), followed by availability (11 firms).

**Table II-7**  
**WMMP: Ranking of factors used in purchasing decisions as reported by U.S. purchasers, by factor**

Factor	First	Second	Third	Total
Quality	29	14	1	44
Price/cost	8	14	18	40
Availability	2	8	11	21
Lead time	---	3	3	6
Reliability	---	3	3	6
Delivery	---	---	5	5
Product meets specifications	3	1	---	4
Service	1	1	2	4
Other	5	7	7	20

Note: Other factors include consistency of product and vendor relationship (3 firms each); capacity, dependability, and product line range (2 firms each); and ability to pay for mistakes made at the factory, ethics and safety, gesso coating/primer, Lacey Act compliance,<sup>32</sup> payment terms, reputation, and volume (1 firm each).

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

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2020; Woodworking Network, *Most radiata pine now grown abroad*, <https://www.woodworkingnetwork.com/wood/wood-month/most-radiata-pine-now-grown-abroad>, accessed November 15, 2020; Wikipedia, *Pinus radiata*, [https://en.wikipedia.org/wiki/Pinus\\_radiata](https://en.wikipedia.org/wiki/Pinus_radiata), accessed November 15, 2020.

<sup>32</sup> The Lacey Act is a federal conservation law passed in 1900 that enforces criminal penalties for the illegal trade of animals and plants. The law makes it illegal “to import, export, sell, acquire or purchase fish, wildlife or plants that are taken, possessed, transported, or sold: 1) in violation of U.S. or Indian law, or 2) in interstate or foreign commerce involving any fish, wildlife, or plants taken possessed or sold in violation of State or foreign law.” U.S. Fish & Wildlife Service, International Affairs, *Lacey Act*, <https://www.fws.gov/international/laws-treaties-agreements/us-conservation-laws/lacey-act.html>, retrieved November 18, 2020.

The majority of purchasers (27 of 46 firms) reported that they only sometimes purchase the lowest-priced product, with 17 reporting that they usually purchase the lowest-priced product. Two firms reported that they never purchase the lowest-priced product, and one firm reported that it always does.

**Importance of specified purchase factors**

Purchasers were asked to rate the importance of 19 factors in their purchasing decisions (table II-8). The factors rated as very important by more than half of responding purchasers were product consistency and reliability of supply (45 firms each), quality meets industry standards (42 firms), availability (41 firms), price (38 firms), delivery time (36 firms), delivery terms (25 firms), and quality exceeds industry standards (24 firms). The factors rated as not important by at least half or nearly half of responding purchasers were hardwood material and minimum quantity requirements (23 firms each).

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

Factor	Very important	Somewhat important	Not important
Availability	41	6	0
Delivery terms	25	19	3
Delivery time	36	10	1
Discounts offered	17	20	10
Gesso coating	16	19	11
Hardwood material	7	14	23
Minimum quantity requirements	7	17	23
Packaging	16	21	10
Payment terms	14	28	5
Price	38	8	0
Primer (other than gesso)	16	24	7
Product consistency	45	1	0
Product range	18	22	7
Quality meets industry standards	42	4	1
Quality exceeds industry standards	24	20	2
Reliability of supply	45	2	0
Species of material	12	28	6
Technical support/service	15	19	13
U.S. transportation costs	12	24	11

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

Purchasers were also asked to elaborate on their characterization of the importance of wood species to their purchasing decisions. Among the firms that rated the species as “very important,” several firms reported a preference for particular species based on certain characteristics. For example, \*\*\* reported a preference for poplar, while \*\*\*

reported a preference for Cumala/Banak.<sup>33</sup> \*\*\* reported that the subspecies of pine is of critical importance, and that “domestic pine is rough and cannot provide a smooth finish,” while \*\*\* reported that Ponderosa or domestic Sugar pine are selling factors in its sales of clear mouldings. \*\*\* reported that the species simply has to be acceptable to the market and the contractors. Several other firms reported that wood species affects the mechanical properties and overall quality of WMMP. For example, \*\*\* reported that species drives the ability to meet and hold specifications, automate manufacturing processes, and meet all compliance/code testing (such as wind, fire, and forced entry). \*\*\* reported that species can affect mouldability and surfacing. \*\*\* reported that species determines the mechanical capabilities, stability, and overall quality/performance of intermediate and final products.

When U.S. producers and importers were asked how important wood species is to its customers, most U.S. producers (9 of 15 firms) and a plurality of importers (18 of 38 firms) reported that it was “somewhat important.” Two U.S. producers and 12 importers reported that it was “very important,” and 4 U.S. producers and 8 importers reported that it was “not important.” In describing the importance of wood species, some firms indicated that customers may prefer specific wood types (such as certain types of pine or softwoods generally), with one firm indicating that some species may warp in extreme hot or cold weather. Other firms indicated that species preferences depend on whether customers desire stained or painted product.

### **Supplier certification**

Most (29 of 46) responding purchasers do not require their suppliers to become certified or qualified to sell WMMP to their firm, while 17 do. Among the firms that require it, the time to qualify a new supplier ranged from 1 to 180 days, for an average of 52 days. Most of these firms required samples, with some of them conducting tests to assure quality and that the product meets their specifications. Several firms also mentioned price as a qualifying factor,

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<sup>33</sup> Cumala (Peru), or Banak (Brazil and Colombia), is a tropical timber found in the lowlands of tropical America. “It is common in the states of Para until Sao Paulo in the cerrado forest of Brazil.” Its common end uses include general housing (such as boards, panels, fittings, and shutter boards), as well as furniture and cabinets, plywood and veneer, and musical instruments. International Tropical Timber website, *Virola (Virola Sebifera)*, <http://www.tropicaltimber.info/specie/virola-virola-sebifera/>, retrieved November 21, 2020.

as well as reliability, lead time, factory visits, process control audits, and responsible sourcing requirements (such as Lacey Act and Forest Stewardship Council compliance).<sup>34</sup>

Six of 45 responding purchasers reported that a domestic or foreign supplier had failed in its attempt to qualify WMMP or had lost their approved status since 2017. \*\*\* cited quality as a reason why an unnamed firm had either failed to qualify or lost its approval status, and \*\*\* reported that several of the firms they contacted in the United States, China, and Brazil could not meet its quality standards. \*\*\* reported that only one domestic producer is FSC certified and they did not produce enough WMMP to sell to the firm. \*\*\* reported that \*\*\* had lost its approval status due to poor quality and \*\*\* had lost its approval status due to a lack of availability. \*\*\* reported that Sumitomo (Indonesia) was not able to deliver the quality specifications it required, and that Green River (Vietnam) and Flying Dragon (China) could not be qualified due to poor working conditions. \*\*\* reported several firms that could not meet various specifications, including CTI (Indonesia), MJB (Indonesia), MJB (Brazil), and Lexington (United States).

### Changes in purchasing patterns

Purchasers were asked about changes in their purchasing patterns from different sources since 2017. As shown in table II-9, a plurality of firms reported that their purchases of domestic WMMP were constant, while an equal number of firms (9 each) reported increasing, decreasing, and fluctuating purchases from China. Pluralities of firms reported increasing purchases from Brazil, Chile, and all other sources.

**Table II-9**  
**WMMP: Changes in purchase patterns from the United States, China, and nonsubject countries**

Source of purchases	Did not purchase	Decreased	Increased	Constant	Fluctuated
United States	2	9	8	15	5
China	4	9	9	6	9
Brazil	4	3	13	11	6
Chile	7	3	12	8	5
All other sources	8	3	10	8	2
Unknown sources	14	1	2	7	6

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

<sup>34</sup> The Forest Stewardship Council (“FSC”) is an international multi-stakeholder nonprofit certification organization that promotes responsible management of the world's forests. Forest Stewardship Council website, <https://www.fsc.org/en/about-us>, retrieved November 18, 2020.

Reasons reported for decreasing domestic purchases included price, quality, a change in customer preference, a change in sourcing strategy, a need for gesso-coated product that was not available from domestic producers, and a transition to imported LVL products due to a preference for its quality, performance, and gesso coating.<sup>35</sup> Reasons reported for increasing domestic purchases included increased demand, firm growth, better lead times and relationships, and the filing of the AD/CVD petitions. Reasons reported for decreasing purchases from China included the preliminary AD/CVD duties and section 301 tariff, and diversification to Indonesia and Malaysia. Reasons reported for increasing purchases from China included increased demand, firm growth, product changes, a need for gesso-coated product that the United States does not offer, superior quality, better availability, low prices, and being placed on allocation by domestic suppliers.

The only reported reason for decreasing purchases from nonsubject country Brazil was that the firm began buying through lumber distributors/brokers. Reasons reported for increasing purchases from Brazil included increased demand, firm growth, competitive prices, “good” availability and lead times, a drop in quality from a previous supplier, the acquisition of companies that were already purchasing from Brazil, a switch from Chinese to Brazilian WMMP, and a lack of availability from domestic sources. Reasons reported for decreasing purchases from nonsubject country Chile included a change in product trends and an allocation change. Reasons reported for increasing purchases from Chile included increased demand, firm growth, low prices, a change in customer buying habits, a shortage of domestic product, and a switch away from purchases of Chinese WMMP.

When asked if they had changed suppliers since January 2017, nearly half (23 of 47) of the responding purchasers reported that they had. Specifically, firms dropped purchases from Araupel (Brazil), Cabrero (Brazil), Capital City LLC (United States), Hampton (United States), Jim White (United States), Masonite (United States), Northwest Hardwood (United States), Pacific Wood Laminates (United States), Sierra Pacific (United States), Solida (Brazil), Sunset Mouldings (Canada), Woodgrain (Chile and the United States), The Woodhub (United States), and unnamed Chinese suppliers due to issues related to quality, prices, capacity, and availability. Firms added or increased purchases from Araupel, BrasPine (Brazil), Bright Wood (United

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<sup>35</sup> As noted earlier, U.S. producers reported that \*\*\* percent of their sales of WMMP in 2019 were offered with an extruded gesso coating, while importers reported that \*\*\* percent of their Chinese WMMP were offered with an extruded gesso coating and \*\*\* percent of their Brazilian WMMP were.

Metrie testified that “99 percent of the MDF that we buy is gesso-coated, and... 90 percent of the finger-joint product we buy has some form of gesso-coating on it.” Hearing transcript, pp. 231-232 (Burke). Jeld-Wen testified that “LVL is nearly always gesso-coated.” Hearing transcript, p. 214 (Dixon).

States), Corinthian (Indonesia), Dalian Shengyou (China), Hampton, Matra/Sechoirs de Beauce (Canada), Metrie (United States), MJB Wood Group (United States), Prime Line (United States), Schweighofer (Austria and Romania), Solida, Stora Enso (Finland), U.S. Lumber (United States), William-MacRae (United States), Zeni (Argentina), and unnamed Asian suppliers due to demand, prices, delivery, supply shortages from other sources, favorable logistics, supply diversification, and the ability to meet specifications.

### **Importance of purchasing domestic product**

Thirty-nine responding purchasers reported that all or most of their purchases did not have domestic-origin requirements, for an estimated total of \*\*\* percent of the responding firms' reported purchases in 2019. No firm reported that domestic product was required by law. Four firms reported that domestic WMMP was required by their customers (for \*\*\* percent of the responding firms' total 2019 purchases), and four firms reported preferences for domestic product for other reasons (for \*\*\* percent of their reported 2019 purchases). Reasons cited for preferring domestic product included a requirement for domestic wood species (2 firms), and better lead times and a good relationship with the domestic supplier (1 firm each).

### **Comparisons of domestic products, subject imports, and nonsubject imports**

Purchasers were asked to make comparisons between WMMP produced in the United States, China, and nonsubject countries. First, purchasers were asked for a country-by-country comparison on the same 19 factors (tables II-10a and II-10b), for which they were asked to rate the importance.

Most purchasers reported that U.S. WMMP was comparable to subject imported WMMP from China, as well as nonsubject imported WMMP from Brazil, Chile, and other countries on most factors (table II-10a). Domestic WMMP was more likely to be rated as superior to Chinese, Brazilian, Chilean, and other nonsubject WMMP on delivery time and inferior on gesso coating and price. Domestic WMMP was also rated by most purchasers as inferior to Chinese and Chilean WMMP on primer (other than gesso). As shown in table II-8, most purchasers rated delivery time and price as "very important," and a plurality of purchasers rated gesso coating as "somewhat important." A slight majority of purchasers also rated primer (other than gesso) as "somewhat important."



**Table II-10a**

**WMMP: Purchasers' comparisons between U.S.-produced and imported product**

Factor	U.S. vs. China			U.S. vs. Brazil			U.S. vs. Chile			U.S. vs. other nonsubject		
	S	C	I	S	C	I	S	C	I	S	C	I
Availability	4	14	12	4	13	11	4	15	8	2	10	2
Delivery terms	6	22	1	4	21	3	6	19	1	1	13	---
Delivery time	20	9	1	20	6	2	20	5	1	8	6	---
Discounts offered	2	23	4	---	22	5	---	21	4	1	12	---
Gesso coating	2	5	21	---	7	20	---	6	19	---	4	8
Hardwood material	5	13	---	7	12	1	6	10	3	2	8	1
Minimum quantity requirements	9	19	---	10	15	1	9	13	1	4	10	---
Packaging	---	26	4	---	25	3	1	22	4	---	14	---
Payment terms	2	28	---	1	24	2	2	20	2	1	13	---
Price	2	6	22	1	4	23	1	6	19	---	3	11
Primer (other than gesso)	1	12	16	---	15	13	---	11	14	---	8	5
Product consistency	3	19	9	---	21	7	---	19	7	1	11	2
Product range	6	11	13	4	15	9	6	12	8	3	9	2
Quality meets industry standards	---	21	8	---	19	9	1	17	8	1	10	3
Quality exceeds industry standards	1	15	12	---	17	10	---	15	11	---	10	4
Reliability of supply	1	20	9	2	18	8	2	18	6	1	11	2
Species of material	4	24	2	3	22	3	4	21	1	---	12	1
Technical support/service	4	21	3	1	22	4	1	21	3	1	11	1
U.S. transportation costs	3	20	4	1	19	7	---	15	9	---	10	1

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

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

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

When comparing subject and nonsubject WMMP, the majority of responding purchasers rated each source as comparable to the other on almost all factors (table II-10b). The only exceptions were gesso coating, for which an equal number of firms (10 each) rated Brazil as comparable and inferior to China, and price, for which an equal number of firms (6 each) rated China as comparable and superior to other (non-U.S. or Brazilian) sources.

**Table II-10b****WMMP: Purchasers' comparisons between subject imported and nonsubject imported product**

Factor	Brazil vs. China			China vs. Other			Brazil vs. Other		
	S	C	I	S	C	I	S	C	I
Availability	1	19	2	3	9	---	2	10	---
Delivery terms	1	20	1	---	10	2	---	11	1
Delivery time	3	19	---	1	10	1	---	10	1
Discounts offered	2	17	1	---	10	1	---	11	---
Gesso coating	2	10	10	3	8	---	---	9	1
Hardwood material	1	11	1	---	9	---	---	8	1
Minimum quantity requirements	1	17	2	1	10	1	---	11	1
Packaging	---	22	---	1	11	---	1	11	---
Payment terms	1	19	2	---	10	2	---	11	1
Price	1	15	5	6	6	---	3	7	2
Primer (other than gesso)	---	15	5	2	9	1	1	10	---
Product consistency	2	16	3	2	10	---	1	11	---
Product range	4	13	4	2	9	1	---	11	1
Quality meets industry standards	---	17	4	1	11	---	---	11	---
Quality exceeds industry standards	1	14	5	1	9	---	1	11	---
Reliability of supply	4	15	2	1	11	---	1	11	---
Species of material	2	17	2	---	10	1	---	10	2
Technical support/service	3	14	2	---	11	---	---	12	---
U.S. transportation costs	---	17	1	---	9	2	---	10	2

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 WMMP

In order to determine whether U.S.-produced WMMP can generally be used in the same applications as imports from China, Brazil, Chile, and other sources, 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-11, a majority of U.S. producers reported that U.S. WMMP is always interchangeable with imported WMMP from any source and that each of the sources are always interchangeable with one another. A plurality of importers reported that each source is frequently interchangeable with every other source, regardless of the comparison, and either a majority or plurality of purchasers reported the same.

**Table II-11**  
**WMMP: Interchangeability between WMMP produced in the United States and in other countries, by country pair**

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. China	9	4	---	2	8	12	10	5	7	14	11	4
U.S. vs. Brazil	9	3	2	---	12	14	9	2	10	14	10	2
China vs. Brazil	8	2	1	---	10	10	8	2	7	13	8	1
U.S. vs. Chile	9	2	4	---	9	11	9	2	9	14	9	---
U.S. vs. Other	8	3	3	---	6	13	9	1	7	11	6	---
China vs. Chile	8	1	3	---	8	10	7	2	8	11	5	1
China vs. Other	7	2	2	---	8	10	8	2	7	8	5	---
Brazil vs. Chile	8	1	2	---	9	11	8	1	9	17	3	---
Brazil vs. Other	7	2	1	---	8	10	7	1	7	9	5	---
Chile vs. Other	7	2	1	---	7	9	8	1	7	9	4	---

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

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

In additional comments, several firms stated that some sources produced better quality products than others; \*\*\* stated that the quality and availability of WMMP from outside the United States is better, \*\*\* reported that “Brazil has the highest quality mouldings,” and \*\*\* reported that China uses a superior primer coat than domestic or Brazilian WMMP. Some firms indicated that certain wood species are only available from certain sources, such as Cumala/Banak (South America), and clear ponderosa pine (United States). Other firms reported that differences in quality and availability of certain types of WMMP, including LVL gesso-coated product and gesso-coated WMMP of certain thicknesses, made domestic and Chinese product less interchangeable. Some firms also reported limited interchangeability due to availability; \*\*\* reported that there are limited small profiles from domestic producers, and \*\*\* reported that “China has profile variability.”

As can be seen from table II-12, most responding purchasers reported that WMMP from the United States, China, Brazil, Chile, and all other sources usually met minimum quality specifications. However, a larger number of purchasers reported that domestic WMMP either sometimes or rarely/never met minimum quality specifications than WMMP from any other source.

**Table II-12**  
**WMMP: Ability to meet minimum quality specifications, by source**

Source	Always	Usually	Sometimes	Rarely or never
United States	6	21	10	3
China	11	24	---	---
Brazil	13	20	2	---
Chile	11	24	---	---
All other sources	13	17	1	1

Note: Purchasers were asked how often domestically produced or imported WMMP 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 WMMP from the United States, China, or nonsubject countries. As seen in table II-13, a majority of U.S. producers and either a majority or a plurality of importers reported that differences other than price were sometimes significant for each country comparison. While either a plurality or majority of purchasers rated differences other than price as sometimes significant for all subject country and nonsubject country comparisons, pluralities of purchasers reported that differences other than price were always significant when comparing U.S. to Chinese WMMP.

**Table II-13**  
**WMMP: Significance of differences other than price between WMMP produced in the United States and in other countries, by country pair**

Country pair	Number of U.S. producers reporting				Number of U.S. importers reporting				Number of purchasers reporting			
	A	F	S	N	A	F	S	N	A	F	S	N
U.S. vs. China	---	2	10	3	9	8	12	3	12	11	11	2
U.S. vs. Brazil	---	1	10	3	8	10	14	4	13	9	12	2
China vs. Brazil	---	1	7	2	2	8	13	6	6	4	14	2
U.S. vs. Chile	---	2	10	2	6	7	14	3	11	8	11	2
U.S. vs. Other	---	2	9	2	5	7	11	3	4	5	10	1
China vs. Chile	---	2	7	2	1	7	14	4	5	3	16	2
China vs. Other	---	1	6	2	1	9	12	4	4	2	11	1
Brazil vs. Chile	---	1	7	2	1	6	13	6	5	3	17	4
Brazil vs. Other	---	1	6	2	1	5	15	4	3	1	14	1
Chile vs. Other	---	1	6	2	1	5	13	4	3	2	13	1

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

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

In additional comments, several firms indicated that quality and availability/capacity were significant non-price factors, though their source preferences were mixed. Some firms stated that the quality and availability of some domestic product was inferior to that of China and Brazil, while others stated that domestic supply is preferable to that from other sources.

## **Elasticity estimates**

This section discusses elasticity estimates. Parties were encouraged to comment on these estimates in their prehearing and/or posthearing briefs; none did so.

### **U.S. supply elasticity**

The domestic supply elasticity for WMMP measures the sensitivity of the quantity supplied by U.S. producers to changes in the U.S. market price of WMMP. 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 WMMP. Analysis of these factors above indicates that the U.S. industry has the ability to moderately-to-greatly increase or decrease shipments to the U.S. market; an estimate in the range of 4 to 7 is suggested.

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

The U.S. demand elasticity for WMMP measures the sensitivity of the overall quantity demanded to a change in the U.S. market price of WMMP. 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 WMMP in the production of any downstream products. Based on the available information, the aggregate demand for WMMP is likely to be moderately elastic; a range of -0.5 to -1.5 is suggested. For products in which MDF is a suitable substitute, such as in indoor applications and/or those in which painted, primed, or otherwise coated product is preferred, demand elasticity may be on the higher end of the range. For products in which PVC and other weather-resistant composites are appropriate substitutes, demand elasticity may be on the lower end of the range.

## **Substitution elasticity**

The elasticity of substitution depends upon the extent of product differentiation between the domestic and imported products.<sup>36</sup> Product differentiation, in turn, depends upon such factors as quality (e.g., chemistry, appearance, etc.) and conditions of sale (e.g., availability, sales terms/discounts/promotions, etc.). Based on available information, the elasticity of substitution between U.S.-produced WMMP and imported WMMP is likely to be in the range of 4 to 7. As detailed earlier, market participants generally described U.S. and subject product as interchangeable, rated price and quality as important purchasing factors, and rated U.S. and Chinese product as comparable on most factors. However, some purchasers expressed preferences for Chinese and/or nonsubject WMMP for reasons related to quality and/or availability, particularly for LVL, gesso coated WMMP, and primed WMMP. Substitutability may therefore be on the lower end of the range for some product types.

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<sup>36</sup> 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 15 firms that accounted for the majority of U.S. production of WMMP during 2019.

### U.S. producers and finishers

The Commission issued a U.S. producers' questionnaire to 32 firms based on information contained in the petition. Fifteen firms provided usable data on their operations.<sup>1</sup> All 15 firms are U.S. producers (i.e., firms that mill their own blanks in the production of WMMP), five of which are also finishers (i.e., firms that domestically purchase and/or import blanks that are further processed into WMMP). Staff believes that these responses represent the majority of U.S. production of WMMP.

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

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<sup>1</sup> During the preliminary phase of the investigations, \*\*\* indicated that it was a U.S. producer of WMMP, but did not respond to the Commission's questionnaire. Staff correspondence with \*\*\*, January 29, 2020. Despite numerous requests by Commission staff, \*\*\* did not submit a U.S. producer questionnaire response during the current final phase investigations. Staff emails to \*\*\*, November 16, 2020, November 18, 2020, and December 23, 2020; and to \*\*\*, December 22, 2020.

**Table III-1**

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

<b>Firm</b>	<b>Position on petition</b>	<b>Production location(s)</b>	<b>Share of WMMP production (percent)</b>	<b>Share of WMMP finishing only operations (percent)</b>
Best Moulding	Petitioner	Albuquerque, NM	***	***
Bright Wood	Petitioner	Madras, OR	***	***
Cascade	Petitioner	White City, OR	***	***
ECMD	***	Wilkesboro, NC	***	***
Endura	Petitioner	Stokesdale, NC Nacogdoches, TX Sparta, TN	***	***
Jeld-Wen	***	Bend, OR Klamath Falls, OR	***	***
Masonite	***	Verdi, NV Stockton, CA	***	***
Menzner	Petitioner	Marathon, WI Wausau, WI Somerset, KY	***	***
Novo	***	Archdale, NC Bowerston, OH Ball Ground, GA Corona, CA High Point, NC Puyallup, WA	***	***
Pacific Wood	Petitioner	Brookings, OR	***	***
Sierra Pacific	Petitioner	Red Bluff, CA Corning, CA	***	***
Smith Millwork	***	Lexington, NC	***	***
Sunset	Petitioner	Chico, CA Live Oak, CA	***	***
Woodgrain	Petitioner	Fruitland, ID Marion, VA Lenoir, NC Montevallo, AL	***	***
Yuba River	Petitioner	Olivehurst, CA	***	***
Total			100.0	100.0

Note.—U.S. producer Sierra Lumber is owned by Masonite. For purposes of this report, Sierra Lumber is referred to as Masonite.

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

Table III-2 presents information on U.S. producers' and finishers' ownership and related and/or affiliated firms.



**Table III-2**

**WMMP: U.S. producers' and finishers' ownership, related and/or affiliated firms, 2017-19, January-June 2019, and January-June 2020**

Item / Firm	Firm Name	Affiliated/Ownership
<b>Ownership:</b>		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
<b>Related importers/exporters:</b>		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
<b>Related producers:</b>		
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***
***	***	***

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

As indicated in table III-2, no U.S. producers are related to foreign producers of the subject merchandise and three U.S. producers are related to U.S. importers of WMMP. In addition, as discussed in greater detail below, one firm directly imports the subject merchandise, one firm is related to an importer of subject merchandise, and three firms purchase the subject merchandise from U.S. importers.

Table III-3 presents U.S. producers' and finishers' reported changes in operations since January 1, 2017. Twelve of 15 firms reported changes in operations. Of these twelve firms, three firms reported plant closings, eight firms reported production shutdowns and/or curtailments, and four firms reported consolidations. In particular, \*\*\* reported closing its \*\*\* production facility in \*\*\* due to \*\*\*. Woodgrain and Endura reported plant closings in 2016 and 2018, respectively, which resulted in employee layoffs.<sup>2</sup> Endura maintains that the Sparta mill and equipment is still in place and can resume operations. In addition, Endura reduced production at its Nacogdoches, Texas facility due to lack of orders.<sup>3</sup> Sierra Pacific also reported production curtailments: temporary layoffs of 1-4 weeks at its Corning, California plant in March 2018 and a 25 percent reduction of millwork capacity at its Red Bluff, California plant in April 2018.<sup>4</sup>

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<sup>2</sup> Conference transcript, p. 35 (Easton) and p. 41 (Procton).

<sup>3</sup> Ibid., p. 40 (Procton).

<sup>4</sup> Ibid., p. 29-30 (Carroll).

**Table III-3**

**WMMP: U.S. producers' and finishers' reported changes in operations, since January 1, 2017**

<b>Item / Firm</b>	<b>Reported changes in operations</b>
<b>Plant openings:</b>	
***	***
***	***
<b>Plant closings:</b>	
***	***
***	***
***	***
<b>Relocations:</b>	
***	***
***	***
<b>Acquisitions:</b>	
***	***
<b>Consolidations:</b>	
***	***
***	***
***	***
***	***

Table continued on next page.

**Table III-3--Continued**

**WMMP: U.S. producers' and finishers' reported changes in operations, since January 1, 2017**

<b>Prolonged shutdowns or curtailments:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table III-3--Continued**

**WMMP: U.S. producers' and finishers' reported changes in operations, since January 1, 2017**

<b>Other:</b>	
***	***
***	***
***	***
***	***
***	***
***	***

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

## **Production related activities**

Five firms (\*\*\*) mill their own wood blanks as well as domestically purchase and/or import wood blanks that are further processed into WMMP.<sup>5</sup> Table III-4 presents these five firms' assessments concerning the complexity and importance of finishing operations. Table III-5 presents their responses to narrative questions relating to their finishing operations. Table III-6 presents a summary of production related activities factors reported by producers and finishers.

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<sup>5</sup> Each firm's ratio of production from purchased and/or imported blanks to its overall production (including production from its own milled blanks) in 2019 were as follows: \*\*\*, \*\*\* percent; \*\*\*, \*\*\* percent; \*\*\*, \*\*\* percent; \*\*\*, \*\*\* percent; and \*\*\*, \*\*\* percent.

**Table III-4**

**WMMP: U.S. finishers' responses to the complexity of finishing operations**

Item	Rating of complexity (1=least complex, 5=most complex)				
	1	2	3	4	5
	<b>Count of firms</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All finishers	***	***	***	***	***
	<b>Narrative</b>				
***	***				
***	***				
***	***				
***	***				
***	***				

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

**Table III-5**

**WMMP: U.S. finishers' nature and extent of finishing operations**

Item/Firm	Narrative
<b>Capital investments</b>	
***	***
***	***
***	***
***	***
***	***
<b>Technical expertise</b>	
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table III-5--Continued**

**WMMP: U.S. finishers' nature and extent of finishing operations**

<b>Item/Firm</b>	<b>Narrative</b>
<b>Value added</b>	
***	***
***	***
***	***
***	***
***	***
<b>Employment</b>	
***	***
***	***
***	***
***	***
***	***
<b>Quantity, type and source of parts</b>	
***	***
***	***
***	***
***	***
***	***
<b>Costs and activities</b>	
***	***
***	***
***	***
***	***
***	***

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

**Table III-6**

**WMMP: Summary of sufficient production related activities factors, 2017-19**

<b>Factor</b>	<b>U.S. producers</b>	<b>U.S. finishers</b>
Source and extent of capital investment <sup>1</sup>	***	***
Technical expertise involved in U.S. production activities <sup>2</sup>	***	***
Value added to the product in the United States <sup>3</sup>	***	***
Employment levels <sup>4</sup>	2,237 to 2,502 PRWs	215 to 235 PRWs
Quantity and type of materials sourced in the United States <sup>5</sup>	***	***

<sup>1</sup> Net assets (range 2017-19).

<sup>2</sup> Research and development expenses (range 2017-19).

<sup>3</sup> Total conversion costs / total COGS (range 2017-19).

<sup>4</sup> Production and related workers (PRW) (range 2017-19).

<sup>5</sup> Raw material values (range 2017-19).

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

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

Table III-7 and figure III-1 present U.S. producers' production, capacity, and capacity utilization. Domestic producers' WMMP production decreased by 22.2 percent during 2017-19 and was 6.5 percent higher in January-June 2020 than in January-June 2019. Capacity decreased by 5.2 percent during 2017-19 and was 0.9 percent higher in January-June 2020 than in January-June 2019. Capacity utilization decreased by 12.9 percentage points during 2017-19 and was 3.3 percentage points higher in January-June 2020 than in January-June 2019.<sup>6</sup>

Constraints on production reported by responding firms include availability of labor and raw materials such as domestic lumber and feeder stock (FJ blanks), equipment capacity, and order volume. In addition, the inability to invest in new equipment can be a production constraint. Due to the capital-intensive nature of wood mouldings manufacturing, investing in new equipment is needed to maximize quality and efficiency. Equipment systems typically cost between \$1-5 million.<sup>7</sup>

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<sup>6</sup> \*\*\* reported decreased production in each year that resulted in capacity utilization rates falling from \*\*\* percent in 2017 to \*\*\* percent in 2019. \*\*\* reported that the downward trend in production during 2017-19 is driven by \*\*\*. It also noted that \*\*\*. Staff correspondence with \*\*\*, December 29, 2020. \*\*\* reported capacity utilization of \*\*\* percent in interim 2020, compared to \*\*\* percent in interim 2019. The firm attributed this trend primarily to \*\*\*. The firm indicated that \*\*\*. Staff correspondence with \*\*\*, December 29, 2020.

<sup>7</sup> Conference transcript, p. 40 (Procton).



**Table III-7**  
**WMMP: U.S. producers' production, capacity, and capacity utilization, 2017-19, January-June**  
**2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Capacity (1,000 board feet)</b>				
Best Moulding	***	***	***	***	***
Bright Wood	***	***	***	***	***
Cascade	***	***	***	***	***
ECMD	***	***	***	***	***
Endura	***	***	***	***	***
Jeld-Wen	***	***	***	***	***
Masonite	***	***	***	***	***
Menzner	***	***	***	***	***
Novo	***	***	***	***	***
Pacific Wood	***	***	***	***	***
Sierra Pacific	***	***	***	***	***
Smith Millwork	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
Yuba River	***	***	***	***	***
All firms	324,312	318,712	307,557	154,423	155,755
	<b>Production (1,000 board feet)</b>				
Best Moulding	***	***	***	***	***
Bright Wood	***	***	***	***	***
Cascade	***	***	***	***	***
ECMD	***	***	***	***	***
Endura	***	***	***	***	***
Jeld-Wen	***	***	***	***	***
Masonite	***	***	***	***	***
Menzner	***	***	***	***	***
Novo	***	***	***	***	***
Pacific Wood	***	***	***	***	***
Sierra Pacific	***	***	***	***	***
Smith Millwork	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
Yuba River	***	***	***	***	***
All firms	232,681	204,257	180,970	91,041	96,941

Table continued on next page.

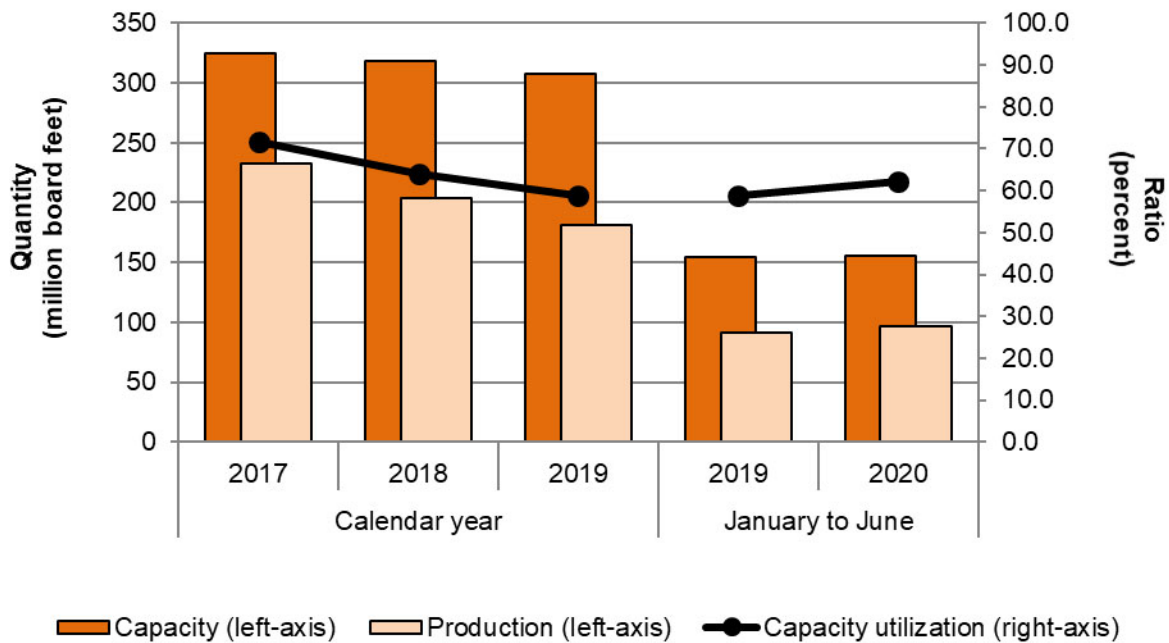
Table III-7--Continued

WMMP: U.S. producers' production, capacity, and capacity utilization, 2017-19, January-June 2019, and January-June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Capacity utilization (percent)</b>				
Best Moulding	***	***	***	***	***
Bright Wood	***	***	***	***	***
Cascade	***	***	***	***	***
ECMD	***	***	***	***	***
Endura	***	***	***	***	***
Jeld-Wen	***	***	***	***	***
Masonite	***	***	***	***	***
Menzner	***	***	***	***	***
Novo	***	***	***	***	***
Pacific Wood	***	***	***	***	***
Sierra Pacific	***	***	***	***	***
Smith Millwork	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
Yuba River	***	***	***	***	***
All firms	71.7	64.1	58.8	59.0	62.2
	<b>Share of production (percent)</b>				
Best Moulding	***	***	***	***	***
Bright Wood	***	***	***	***	***
Cascade	***	***	***	***	***
ECMD	***	***	***	***	***
Endura	***	***	***	***	***
Jeld-Wen	***	***	***	***	***
Masonite	***	***	***	***	***
Menzner	***	***	***	***	***
Novo	***	***	***	***	***
Pacific Wood	***	***	***	***	***
Sierra Pacific	***	***	***	***	***
Smith Millwork	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
Yuba River	***	***	***	***	***
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**  
**WMMP: U.S. producers' production, capacity, and capacity utilization, 2017-19, January-June 2019, and January-June 2020**



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

Table III-8 and figure III-2 present U.S. finishers' production, capacity, and capacity utilization. Table III-9 presents U.S. finishers' production by source. Both capacity and production increased from 2017 to 2019, by 18.2 percent and 17.5 percent respectively and were lower in January-June 2020 than in January-June 2019, by 1.0 percent and 10.5 percent respectively. Capacity utilization decreased slightly during 2017-19, by 0.3 percentage points and was 5.1 percentage points lower in January-June 2020 than in January-June 2019.

All five firms that engaged in finishing operations reported that they consider capacity for production from their own milled blanks to be the same as capacity for production from purchased/imported blanks. Thus, they allocated finishing capacity based on a ratio of overall production.<sup>8</sup> The vast majority of finishing operations of WMMP used blanks that were either domestically purchased or imported from nonsubject sources.

<sup>8</sup> Staff correspondence with \*\*\*, November 9, 2020 (\*\*\*), November 12, 2020 (\*\*\*), November 16, 2020 (\*\*\*); staff correspondence with \*\*\*, November 17, 2020; and \*\*\* preliminary questionnaire at II-3a compared to its final questionnaire at II-7 and V-1.

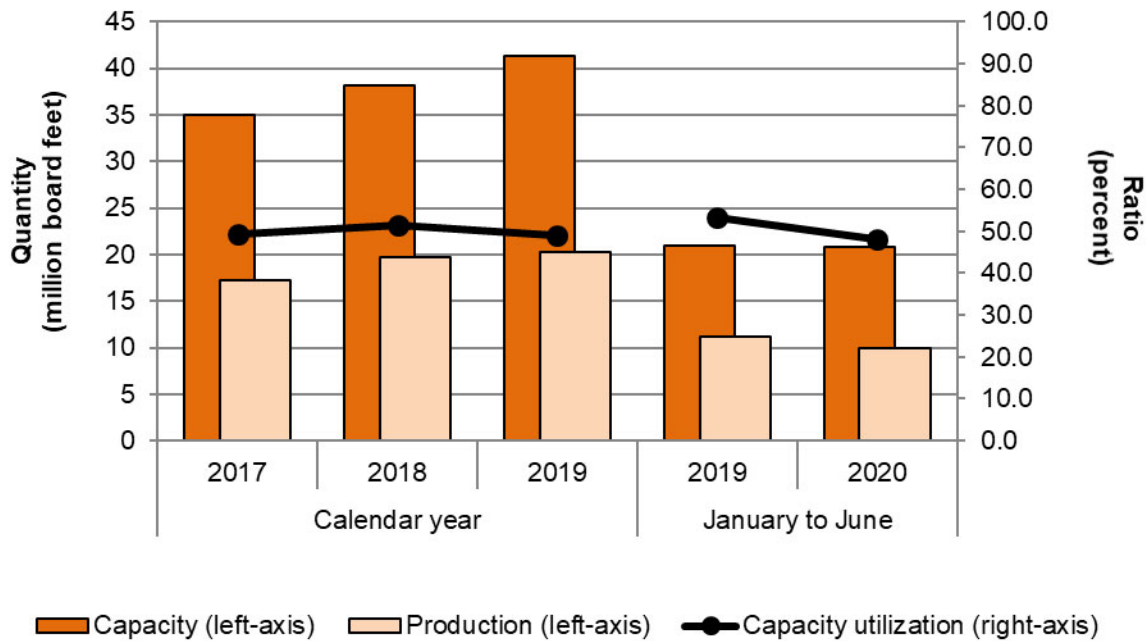
**Table III-8**  
**WMMP: U.S. finishers' capacity, production, and capacity utilization, 2017-19, January-June 2019,**  
**and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Capacity (1,000 board feet)</b>				
Cascade	***	***	***	***	***
Endura	***	***	***	***	***
Novo	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
All firms	34,939	38,109	41,305	20,977	20,761
	<b>Production (1,000 board feet)</b>				
Cascade	***	***	***	***	***
Endura	***	***	***	***	***
Novo	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
All firms	17,221	19,670	20,228	11,176	9,998
	<b>Capacity utilization (percent)</b>				
Cascade	***	***	***	***	***
Endura	***	***	***	***	***
Novo	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
All firms	49.3	51.6	49.0	53.3	48.2
	<b>Share of production (percent)</b>				
Cascade	***	***	***	***	***
Endura	***	***	***	***	***
Novo	***	***	***	***	***
Sunset	***	***	***	***	***
Woodgrain	***	***	***	***	***
All firms	100.0	100.0	100.0	100.0	100.0

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

Figure III-2

WMMP: U.S. finishers' capacity, production, and capacity utilization, 2017-19, January-June 2019, and January-June 2020



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

Table III-9

WMMP: U.S. finishers' production by source, 2017-19, January-June 2019, and January-June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Production:					
using domestic blanks	***	***	***	***	***
using Chinese blanks	***	***	***	***	***
using Brazilian blanks	***	***	***	***	***
using all other imported blanks	***	***	***	***	***
All finishing production	17,221	19,670	20,228	11,176	9,998
	<b>Share of production (percent)</b>				
Production:					
using domestic blanks	***	***	***	***	***
using Chinese blanks	***	***	***	***	***
using Brazilian blanks	***	***	***	***	***
using all other imported blanks	***	***	***	***	***
All finishing production	100.0	100.0	100.0	100.0	100.0

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

## Alternative products

As shown in table III-10, the majority of the product produced by U.S. producers was WMMP (86.4 percent in 2019). Six firms reported producing alternative products using the same equipment and/or employees, including MDF mouldings, countertops, rough lineal blanks, window parts and beehive components, custom manufacturing, double hung or casement window sashes, and defect-free lumber from solid blanks and cut stock.<sup>9</sup> Two firms, \*\*\*, accounted for the majority of out-of-scope production (\*\*% percent in 2019).

Firms were asked about their ability to switch production from WMMP to other products. Employee training, a new customer base, significant investment in new equipment, and demand all impact producers' ability to switch production. According to conference testimony, equipment is for the most part dedicated to converting wood to a finished moulding and the ability to produce alternative products is limited.<sup>10</sup> In addition, \*\*\* reported that it is trying to replace "lost production" of wood mouldings with new products, such as redwood and thermally modified mouldings.

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<sup>9</sup> \*\*\* reported producing small quantities of MDF products on some pieces of equipment that also make WMMP products. \*\*\* reported production of MDF mouldings made on different, dedicated equipment using the same workers as WMMP. Staff correspondence with \*\*\*, November 16, 2020 and November 12, 2020. Both firms reported that \*\*\*.

<sup>10</sup> Conference transcript, p. 55 (Procton).

**Table III-10****WMMP: U.S. producers' overall plant capacity and production on the same equipment and/or employees as subject production, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Overall capacity	372,972	366,760	360,655	182,645	179,448
Production:					
Wood mouldings	232,681	204,257	180,970	91,041	96,941
Out-of-scope production:					
MDF MMP	***	***	***	***	***
Other	***	***	***	***	***
All out-of-scope production	32,242	29,886	28,495	13,883	13,097
Total production on same machinery	264,923	234,143	209,465	104,924	110,038
	<b>Ratios and shares (percent)</b>				
Overall capacity utilization	71.0	63.8	58.1	57.4	61.3
Production:					
Wood mouldings	87.8	87.2	86.4	86.8	88.1
Out-of-scope production:					
MDF MMP	***	***	***	***	***
Other	***	***	***	***	***
All out-of-scope production	12.2	12.8	13.6	13.2	11.9
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' and finishers' U.S. shipments and exports

Table III-11 presents U.S. producers' U.S. shipments, export shipments, and total shipments. U.S. shipments by quantity and value decreased overall during 2017-19, by 23.2 percent and 18.3 percent, respectively, and were higher in January-June 2020 than in January-June 2019, by 10.3 percent and 8.4 percent, respectively. U.S. producers' U.S. shipments accounted for nearly all total shipments (\*\*\*) percent in 2019). U.S. shipment unit values also increased during 2017-19, by 6.4 percent from \$2.07 per board foot to \$2.21 per board foot but were 1.7 percent lower in January-June 2020 than in January-June 2019. Exports, which accounted for less than \*\*\* percent of total shipments, decreased by \*\*\* percent during 2017-19 and were \*\*\* percent lower in interim 2020 than in interim 2019.<sup>11</sup>

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<sup>11</sup> Three firms reported internal consumption, while five firms reported transfers to related firms with (\*\*\*) percent, accounting for the majority (\*\*\*) percent in 2019). In addition, six producers reported small quantities of export shipments.

Table III-11

WMMP: U.S. producers' U.S. shipments, exports shipments, and total shipments, 2017-19, January-June 2019, and January-June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	232,903	203,810	178,791	88,497	97,608
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	483,146	434,975	394,676	197,212	213,744
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	2.07	2.13	2.21	2.23	2.19
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of value (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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



Table III-12 presents U.S. finishers' U.S. shipments, export shipments, and total shipments. U.S. finishers' U.S. shipments by quantity increased by 11.9 percent from 2017 to 2019. This trend is driven by \*\*\*, which accounted for the majority of finishers' U.S. shipments during the period of investigation and \*\*. U.S. shipments were 3.8 percent higher in January-June 2020 than in January-June 2019. Four of five finishers reported higher U.S. shipments in January-June 2020 than in January-June 2019. The value of U.S. shipments also increased, by 13.1 percent during 2017-19, and were 3.2 percent lower in interim 2020 than in interim 2019. U.S. shipment unit values increased by 1.0 percent during 2017-19 and were 6.8 percent lower in interim 2020 than in interim 2019.<sup>12</sup>

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<sup>12</sup> \*\*\*.

Table III-12

WMMP: U.S. finishers' U.S. shipments, export shipments, and total shipments, 2017-19, January-June 2019, and January-June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	17,785	19,250	19,907	9,374	9,734
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	57,628	63,498	65,157	31,474	30,471
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	3.24	3.30	3.27	3.36	3.13
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of value (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

Table III-13 presents U.S. producers' and finishers' U.S. shipments for use in apparent U.S. consumption including the incremental value associated with finishing operations.

**Table III-13**

**WMMP: U.S. producers' and U.S. finishers' U.S. shipments for use in apparent U.S. consumption, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments	232,903	203,810	178,791	88,497	97,608
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.-- Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	513,203	468,191	428,791	213,212	231,111

Note.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP sold in the United States from U.S. producers that produce their own milled blanks; the "fully domestic value" for U.S. producers' U.S. shipments reflects the value of WMMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to domestically sourced blanks by U.S. finishers; the "value added to imports" for U.S. producers' U.S. shipments reflects the value added to imported blanks by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

## U.S. producers' and finishers' inventories

Tables III-14 and III-15 present U.S. producers' and finishers' end-of-period inventories and the ratio of these inventories to production, U.S. shipments, and total shipments, respectively. U.S. producers' ending inventories increased by 9.8 percent during 2017-19 and were 13.4 percent lower in January-June 2020 than in January-June 2019. Following a similar trend, U.S. finishers' inventories increased by \*\*\* percent from 2017 to 2019 and were \*\*\* percent lower in interim 2020 than in interim 2019.

**Table III-14****WMMP: U.S. producers' inventories, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' end-of-period inventories	10,653	10,212	11,701	12,444	10,780
	<b>Ratio (percent)</b>				
Ratio of inventories to.--					
U.S. production	4.6	5.0	6.5	6.8	5.6
U.S. shipments	4.6	5.0	6.5	7.0	5.5
Total shipments	***	***	***	***	***

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

**Table III-15****WMMP: U.S. finishers' inventories, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. finishers' end-of-period inventories	***	***	***	***	***
	<b>Ratio (percent)</b>				
Ratio of inventories to.--					
U.S. production	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

## U.S. producers' and finishers' imports and purchases

U.S. producers' and finishers' imports of WMMP are presented in table III-16. Five U.S. producers and/or finishers imported WMMP from subject and nonsubject sources or are related to U.S. importers of WMMP. U.S. producer/finisher \*\*\* imported WMMP from China and other sources while U.S. producer \*\*\* is related to an importer of WMMP from China and other sources. U.S. producers \*\*\* and \*\*\* imported WMMP from nonsubject sources while U.S. producer/finisher \*\*\* is related to an importer of WMMP from nonsubject sources. U.S. producers cited price, product mix, production constraints, and volume as the primary reasons for importing.

U.S. producers' and finishers' purchases of WMMP are presented in table III-17. Seven firms purchased product from subject and nonsubject sources. Three firms, \*\*\*, reported purchases of imports of WMMP from China.

**Table III-16**  
**WMMP: U.S. producers' and finishers' imports, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

**Table III-16--Continued**  
**WMMP: U.S. producers' and finishers' imports, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

**Table III-16--Continued**  
**WMMP: U.S. producers' and finishers' imports, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

**Table III-17**  
**WMMP: U.S. producers' and finishers' purchases, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*



**Table III-17--Continued**  
**WMMP: U.S. producers' and finishers' purchases, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

**Table III-17--Continued**  
**WMMP: U.S. producers' and finishers' purchases, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

**Table III-17--Continued**  
**WMMP: U.S. producers' and finishers' purchases, 2017-19, January-June 2019, and January-June 2020**

\* \* \* \* \*

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

Table III-18 shows U.S. producers' employment-related data. All employment-related indicators decreased between 2017 and 2019, with the exception of hourly wages and unit labor costs. Similarly, production workers, total hours worked, and wages paid were lower in January-June 2020 than in January-June 2019. Hours per worker, hourly wages, productivity, and unit labor costs improved in January-June 2020 when compared to January-June 2019. U.S. producers cited reduced production and sales due to increased imports as reasons for why employment indicators declined during the period for which data were collected. The lower employment indicators also reflect the various plant closings, production curtailments, consolidations, and employee layoffs discussed above.

Specifically, the number of production and related workers ("PRWs") decreased by 10.6 percent from 2017 to 2019 and was 3.3 percent lower in interim 2020 than in interim 2019. Hours worked and wages paid also decreased from 2017-19, by \*\*\* percent and \*\*\* percent respectively and were lower in interim 2020 than in interim 2019. Hourly wages increased by \*\*\* percent between 2017 and 2019 and were \*\*\* percent higher in interim 2020 than in interim 2019. Unit labor costs increased by \*\*\* percent during 2017-19 and were \*\*\* percent lower in interim 2020 than in interim 2019.

**Table III-18**

**WMMP: U.S. producers' employment related data, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	2,502	2,363	2,237	2,275	2,201
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (board feet per hour)	***	***	***	***	***
Unit labor costs (dollars per board foot)	***	***	***	***	***

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

Table III-19 presents U.S. finishers' employment-related data. U.S. finishers' employment-related indicators increased between 2017 and 2019, with the exception of PRWs and unit labor costs. Similarly, all employment-related indicators were higher in January-June 2020 than in January-June 2019, with the exception of hours worked per PRW and productivity.

**Table III-19**

**WMMP: U.S. finishers' employment related data, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	235	226	215	216	221
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (board feet per hour)	***	***	***	***	***
Unit labor costs (dollars per board foot)	***	***	***	***	***

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

Table III-20 presents U.S. producers' and finishers' combined employment-related data.<sup>13</sup>

**Table III-20**

**WMMP: Combined U.S. producers' and U.S. finishers' employment related data, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	2,737	2,589	2,452	2,491	2,422
Total hours worked (1,000 hours)	5,761	5,368	4,976	2,575	2,516
Hours worked per PRW (hours)	2,105	2,073	2,029	1,034	1,039
Wages paid (\$1,000)	99,427	94,483	88,608	44,826	45,049
Hourly wages (dollars per hour)	\$17.26	\$17.60	\$17.81	\$17.41	\$17.90

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

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<sup>13</sup> \*\*\* reported the same number of PRWs engaged in finishing activities of its own milled blanks and from purchased/imported blanks. \*\*\* stated that it takes a similar number of PRWs to finish its own milled blanks as it does to finish purchased/imported blanks. To avoid double counting, staff allocated \*\*\* number of PRWs based on a share of its total production (from own milled blanks plus purchased blanks). See staff correspondence with \*\*\*, December 30, 2020; and \*\*\* producer questionnaire at II-11 and V-5.



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

### U.S. importers

The Commission issued importer questionnaires to 102 firms believed to be importers of subject WMMP, as well as to all U.S. producers of WMMP.<sup>1</sup> Usable questionnaire responses were received from 46 companies, which staff believe represent the majority of U.S. imports from China and all other sources in 2019.<sup>2 3</sup> Based on proprietary Customs records, importer questionnaire responses accounted for the following shares of U.S. imports in 2019.<sup>4 5</sup>

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<sup>1</sup> The Commission issued questionnaires to those firms identified in the petition, along with firms that, based on a review of data provided by U.S. Customs and Border Protection (“Customs”), may have accounted for more than one percent of total imports under HTS statistical reporting numbers 4409.10.4010, 4409.10.4090, 4409.10.4500, 4409.10.5000, 4409.22.4000, 4409.22.5000, 4409.29.4100, and 4409.29.5100 in 2019.

<sup>2</sup> \*\*\* provided a partial questionnaire response, which staff incorporated. \*\*\* provided a questionnaire response during the preliminary phase of the investigations, which staff incorporated. \*\*\* reported that it stopped importing WMMP in December 2019. Staff correspondence with \*\*\*, November 13, 2020. \*\*\* provided an incomplete questionnaire response and was not included. An additional 15 firms certified that they did not import WMMP from any source since January 1, 2017.

<sup>3</sup> Four firms (\*\*\*) were unable to provide data in board feet. These firms’ data were converted from lineal feet to meters to board feet using conversion factors of 1 lineal foot = 0.3048 meters and 1 meter = 0.65 board feet.

<sup>4</sup> Coverage was calculated based on proprietary Customs records using HTS statistical reporting numbers mentioned above (quantity of imports accounted by firms that responded to the Commission’s questionnaire divided by total quantity of imports). Coverage figures may be overstated as firms may import under other HTS statistical reporting numbers classified as “basket” categories and contain substantial out-of-scope products. All firms that provided a questionnaire in the preliminary phase of the investigations participated in the current final phase.

<sup>5</sup> Import figures presented in this report differ from the preliminary phase of the investigations. Staff followed up with all firms to resolve discrepancies between their preliminary and final phase questionnaires and received explanations for such discrepancies and/or revisions when appropriate, including from \*\*\*, identified as a leading importer of WMMP during the preliminary phase, which confirmed during the current final phase that it had misclassified the vast majority of product it had reported during the preliminary phase as imports rather than purchases. See responses to Commission staff’s requests for revisions from \*\*\*, November 17, 2020; \*\*\*, November 18, 2020; \*\*\*, November 20, 2020; and \*\*\*, November 23, 2020. Also, during the preliminary phase, import data in lineal feet provided by several firms was inadvertently included (see footnote 3 above).

- China, \*\*\* percent,
- All other sources, \*\*\* percent,<sup>6</sup> and
- Total, \*\*\* percent

Table IV-1 lists all responding U.S. importers of WMMP from China, Brazil, Chile, and other sources, their locations, and their shares of U.S. imports, in 2019.

**Table IV-1  
WMMP: U.S. importers, their headquarters, and share of total imports by source, 2019**

Firm	Headquarters	Share of imports by source (percent)					
		China	Brazil	Chile	All other	Non-subject	All imports
Adami	Caçador, SC	***	***	***	***	***	***
Aiji	Ontario, CA	***	***	***	***	***	***
Alexandria	Moxee, WA	***	***	***	***	***	***
Antuco	Bend, OR	***	***	***	***	***	***
Arauco	Atlanta, GA	***	***	***	***	***	***
Arapel	Porto Alegre, RS (Brazil)	***	***	***	***	***	***
Artistree	Irving, TX	***	***	***	***	***	***
Black River	Wichita, KS	***	***	***	***	***	***
BlueLinx	Marietta, GA	***	***	***	***	***	***
BMC	Raleigh, NC	***	***	***	***	***	***
Boise Cascade	Boise, ID	***	***	***	***	***	***
Braspine	Jaguariaíva/Telêmaco Borba, PR (Brazil)	***	***	***	***	***	***
Cali Bamboo	San Diego, CA	***	***	***	***	***	***
CFFCO	Jericho, NY	***	***	***	***	***	***
CTI	Sacramento, CA	***	***	***	***	***	***
ECMD	North Wilkesboro, NC	***	***	***	***	***	***
Evermark	Suwanee, GA	***	***	***	***	***	***
Global Pacific	Westfield, IN	***	***	***	***	***	***
Hampton	Portland, OR	***	***	***	***	***	***
Home Depot	Atlanta, GA	***	***	***	***	***	***
Ipumirim	Ipumirim, SC (Brazil)	***	***	***	***	***	***
Jeld-Wen	Charlotte, NC	***	***	***	***	***	***
Lavrama	Curitiba, PR	***	***	***	***	***	***
Masonite	Tampa, FL	***	***	***	***	***	***
Matos	Encinitas, CA	***	***	***	***	***	***

Table continued on next page.

<sup>6</sup> Commerce determined that imports of WMMP from Brazil are not being sold at less than fair value. Thus, Brazil is presented as a nonsubject source.



**Table IV-1--Continued**  
**WMMP: U.S. importers by source, 2019**

Firm	Headquarters	Share of imports by source (percent)					
		China	Brazil	Chile	All other	Non-subject	All imports
Metrie	Blaine, WA	***	***	***	***	***	***
MJB	Dallas, TX	***	***	***	***	***	***
Molduras	Durango, DG	***	***	***	***	***	***
MP Lumber	Tigard, OR	***	***	***	***	***	***
Northwest Hardwoods	Tacoma, WA	***	***	***	***	***	***
Novo	Zeeland, MI	***	***	***	***	***	***
OI-Wood	Fall City, WA	***	***	***	***	***	***
Omega Moulding	Bellport, NY	***	***	***	***	***	***
Pinelli	Alpharetta, GA	***	***	***	***	***	***
Shamrock	Eugene, OR	***	***	***	***	***	***
Solida	Rio Negrinho, SC (Brazil)	***	***	***	***	***	***
Sterling	Friendswood, TX	***	***	***	***	***	***
Tampa International	Tampa, FL	***	***	***	***	***	***
Tuson	Albertson, NY	***	***	***	***	***	***
Weston Wood	Brampton, ON	***	***	***	***	***	***
Wholesale Millwork	Seaford, DE	***	***	***	***	***	***
William-MacRae	Omaha, NE	***	***	***	***	***	***
Wood Brokerage	Lake Oswego, OR	***	***	***	***	***	***
Woodgrain Distribution	Lawrenceville, GA	***	***	***	***	***	***
Woodhub	Wellesley, MA	***	***	***	***	***	***
Worldwide Door	Tampa, FL	***	***	***	***	***	***
Total		100.0	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.

Note.--Aiji was presented as "Pacific" in the prehearing report.

Note.--Staff incorporated \*\*\* preliminary questionnaire response. \*\*\* did not provide a final phase questionnaire response, but reported that it stopped importing WMMP in December 2019. Staff correspondence with \*\*\*, November 13, 2020.

Note.--Braspine and Braslumber submitted individual questionnaire responses in the preliminary phase of the investigations. During this current final phase, Braspine Madeiras Ltda / Braslumber Industria de Molduras Ltda ("Braspine") submitted one questionnaire response covering both establishments.

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 WMMP from China, Brazil, Chile, and all other sources. During 2017-19, total U.S. imports increased overall by 15.5 percent and were 1.5 percent lower in January-June 2020 than in January-June 2019. Imports from China increased by 29.1 percent during 2017-19 and were 8.2 percent higher in January-June 2020 than in January-June 2019. Imports from nonsubject sources increased by 10.6 percent during 2017-19 and were 5.3 percent lower in interim 2020 than in interim 2019.

Imports from China as a share of total imports increased by 3.1 percentage points, from 26.6 percent in 2017 to 29.8 percent in 2019. Nonsubject sources as a share of total imports decreased by 3.1 percentage points and accounted for 70.2 percent of total imports in 2019. Leading nonsubject sources of imports include Brazil, Chile, and Mexico.<sup>7</sup> The ratio of imports from China to U.S. production increased by 54.9 percentage points during 2017-19, from 83.2 percent to 138.1 percent.

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<sup>7</sup> Other nonsubject sources of imports reported by responding firms include Argentina, Canada, Estonia, Finland, Germany, Indonesia, Italy, Lithuania, Malaysia, Netherlands, New Zealand, Spain, Uruguay, and Vietnam.

**Table IV-2**  
**WMMP: U.S. imports by source, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. imports from.--					
China	193,581	257,459	249,855	116,015	125,577
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	532,844	548,293	589,512	290,617	275,128
All import sources	726,424	805,752	839,367	406,632	400,705
	<b>Value (1,000 dollars)</b>				
U.S. imports from.--					
China	270,364	361,105	352,176	168,498	184,506
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	751,384	739,742	789,348	394,463	382,963
All import sources	1,021,748	1,100,847	1,141,524	562,960	567,469
	<b>Unit value (dollars per board foot)</b>				
U.S. imports from.--					
China	1.40	1.40	1.41	1.45	1.47
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	1.41	1.35	1.34	1.36	1.39
All import sources	1.41	1.37	1.36	1.38	1.42
	<b>Share of quantity (percent)</b>				
U.S. imports from.--					
China	26.6	32.0	29.8	28.5	31.3
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	73.4	68.0	70.2	71.5	68.7
All import sources	100.0	100.0	100.0	100.0	100.0
	<b>Share of value (percent)</b>				
U.S. imports from.--					
China	26.5	32.8	30.9	29.9	32.5
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	73.5	67.2	69.1	70.1	67.5
All import sources	100.0	100.0	100.0	100.0	100.0

Table continued on next page.

Table IV-2--Continued

WMMP: U.S. imports by source, 2017-19, January-June 2019, and January-June 2020

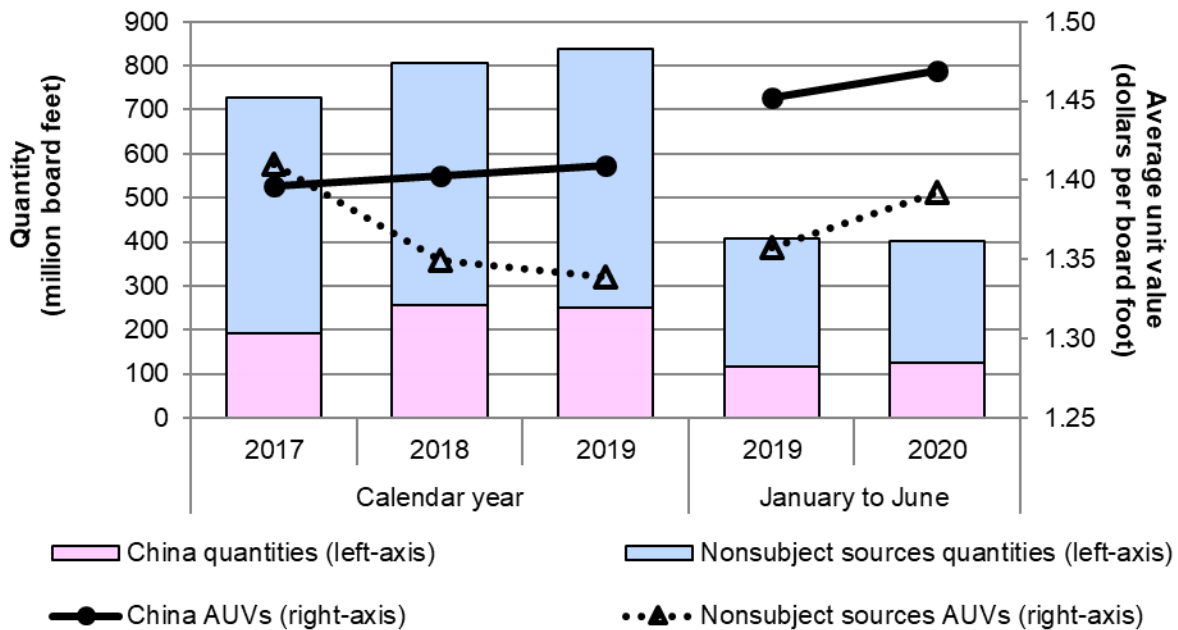
Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	Ratio to U.S. production				
U.S. imports from.--					
China	83.2	126.0	138.1	127.4	129.5
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	229.0	268.4	325.8	319.2	283.8
All import sources	312.2	394.5	463.8	446.6	413.3

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-1

WMMP: U.S. import quantities and average unit values, 2017-19, January-June 2019, and January-June 2020



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

## Negligibility

The statute requires that an investigation be terminated without an injury determination if imports of the subject merchandise are found to be negligible.<sup>8</sup> Negligible imports are generally defined in the Act, as amended, as imports from a country of merchandise corresponding to a domestic like product where such imports account for less than 3 percent of the volume of all such merchandise imported into the United States in the most recent 12-month period for which data are available that precedes the filing of the petition or the initiation of the investigation. However, if there are imports of such merchandise from a number of countries subject to investigations initiated on the same day that individually account for less than 3 percent of the total volume of the subject merchandise, and if the imports from those countries collectively account for more than 7 percent of the volume of all such merchandise imported into the United States during the applicable 12-month period, then imports from such countries are deemed not to be negligible.<sup>9</sup> Table IV-3 presents the individual shares of total imports by source, during January 2019 through December 2019.

**Table IV-3**  
**WMMP: U.S. imports in the twelve month period preceding the filing of the petition, January 2019 through December 2019**

Item	January 2019 through December 2019	
	Quantity (1,000 board feet)	Share quantity (percent)
U.S. imports from.--		
China	249,855	29.8
Brazil	***	***
All other sources	***	***
Nonsubject sources	589,512	70.2
All import sources	839,367	100.0

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

<sup>8</sup> Sections 703(a)(1), 705(b)(1), 733(a)(1), and 735(b)(1) of the Act (19 U.S.C. §§ 1671b(a)(1), 1671d(b)(1), 1673b(a)(1), and 1673d(b)(1)).

<sup>9</sup> Section 771 (24) of the Act (19 U.S.C § 1677(24)).

## Apparent U.S. consumption

Table IV-4 and figure IV-2 present data on apparent U.S. consumption for WMMP. The quantity of apparent U.S. consumption increased by 4.0 percent during 2017-19 and was 3.2 percent higher in January-June 2020 than in January-June 2019. The value of apparent U.S. consumption also increased by 1.6 percent during 2017-19 and was 5.0 percent higher in January-June 2020 than in January-June 2019.

**Table IV-4**  
**WMMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January-June 2019, and January-June 2020**

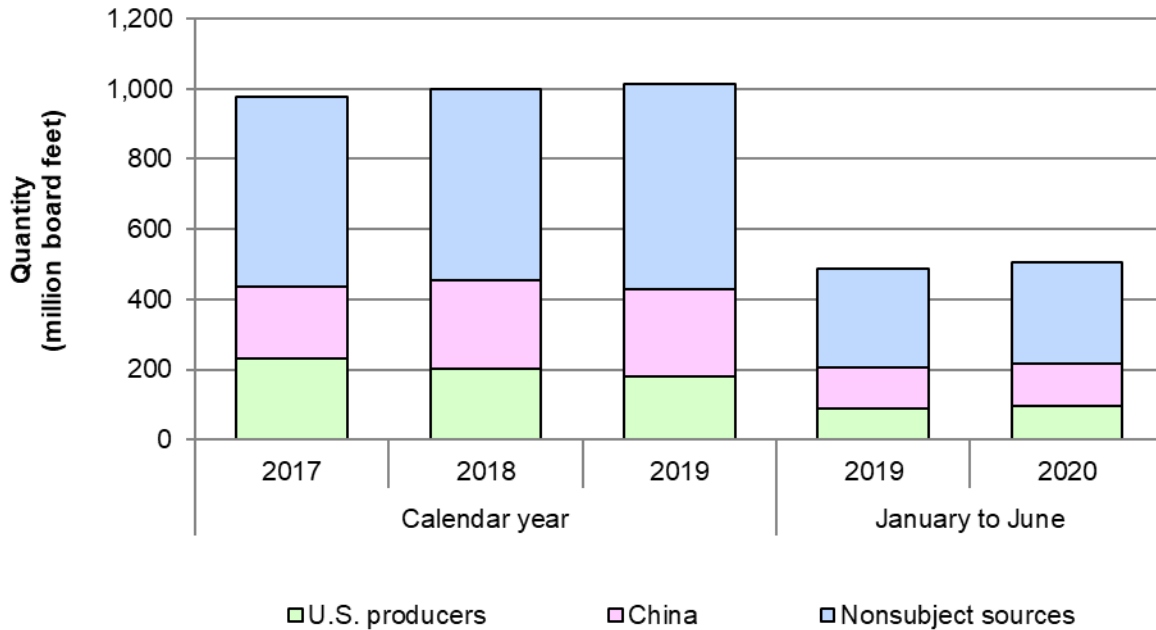
Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments	232,903	203,810	178,791	88,497	97,608
U.S. importers' U.S. shipments from.-- China	203,143	252,289	251,734	119,172	117,931
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	539,968	544,470	584,706	280,941	288,522
All import sources	743,112	796,759	836,440	400,112	406,452
Apparent U.S. consumption	976,014	1,000,570	1,015,231	488,609	504,061
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.-- Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	513,203	468,191	428,791	213,212	231,111
U.S. importers' U.S. shipments from.-- China	324,493	401,298	407,114	195,082	201,840
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	811,064	792,646	839,104	410,208	426,488
All import sources	1,135,557	1,193,944	1,246,218	605,290	628,328
Apparent U.S. consumption	1,648,760	1,662,135	1,675,009	818,502	859,439

Note.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP sold in the United States from U.S. producers that produce their own milled blanks; the value for U.S. producers' U.S. shipments reflects the value of WMMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

**Figure IV-2**

**WMMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January-June 2019, and January-June 2020**



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

Table IV-5 and figure IV-3 present U.S. producers' and U.S. importers' U.S. shipments by material. Table IV-6 and figure IV-4 present U.S. producers' and U.S. importers' U.S. shipments by product type.<sup>10</sup> The majority of U.S. producers' and U.S. importers' U.S. shipments were of pine material. Both U.S. producers and U.S. importers identified the majority of their U.S. shipments in the following categories: "door frames/jamb," "door/window casings, trim (excluding S1S2E), and base boards," and "other."<sup>11</sup>

<sup>10</sup> For additional data regarding U.S. producers' and U.S. importers' U.S. shipments by material and product type, see appendix E.

<sup>11</sup> S1S2E (Smooth 1 Side and 2 Edges) are sanded on one side and two edges. The non-sanded face of the board is milled to a rough texture. Trim boards are cut to Standard Dimensions, which means that the board's finished dimensions will be slightly smaller than its nominal dimensions.

**Table IV-5**  
**WMMP: U.S. producers' and U.S. importers' U.S. shipments by material, 2019**

Item	Pine	Fir	Other softwoods	Hardwoods	Other	All materials
<b>Quantity (1,000 board feet)</b>						
U.S. producers	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Chile	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***
<b>Share across (percent)</b>						
U.S. producers	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Chile	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***
<b>Share down (percent)</b>						
U.S. producers	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***
Brazil	***	***	***	***	***	***
Chile	***	***	***	***	***	***
All other sources	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***
All import sources	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***

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



**Figure IV-3**  
**WMMP: U.S. producers' and U.S. importers' U.S. shipments by material, 2019**

\* \* \* \* \*

**Table IV-6**  
**WMMP: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019**

Item	Blanks	Door frames / jamba	Casings / trim / base	S1S2E	Crown / cove mouldings	Base caps / corner guards	Corbels / plinths	Other	All types
<b>Quantity (1,000 board feet)</b>									
U.S. producers	***	***	***	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
Chile	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***	***	***	***
<b>Share across (percent)</b>									
U.S. producers	***	***	***	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
Chile	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***	***	***	***
<b>Share down (percent)</b>									
U.S. producers	***	***	***	***	***	***	***	***	***
U.S. importers.-- China	***	***	***	***	***	***	***	***	***
Brazil	***	***	***	***	***	***	***	***	***
Chile	***	***	***	***	***	***	***	***	***
All other sources	***	***	***	***	***	***	***	***	***
Nonsubject sources	***	***	***	***	***	***	***	***	***
All import sources	***	***	***	***	***	***	***	***	***
U.S. producers and U.S. importers	***	***	***	***	***	***	***	***	***

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

**Figure IV-4**  
**WMMP: U.S. producers' and U.S. importers' U.S. shipments by product type, 2019**

\* \* \* \* \*

## U.S. market shares

U.S. market share data are presented in table IV-7. U.S. producers' market share decreased by 6.3 percentage points between 2017 and 2019. Import market shares increased during the same period, by 4.0 percentage points for China and by 2.3 percentage points from nonsubject sources during the same period.

**Table IV-7**

**WMMP: U.S. producers', U.S. finishers' and U.S. importers' market shares, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Apparent U.S. consumption	976,014	1,000,570	1,015,231	488,609	504,061
	<b>Share of quantity (percent)</b>				
U.S. producers' U.S. shipments	23.9	20.4	17.6	18.1	19.4
U.S. importers' U.S. shipments from.-- China	20.8	25.2	24.8	24.4	23.4
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	55.3	54.4	57.6	57.5	57.2
All import sources	76.1	79.6	82.4	81.9	80.6
	<b>Value (1,000 dollars)</b>				
Apparent U.S. consumption	1,648,760	1,662,135	1,675,009	818,502	859,439
	<b>Share of value (percent)</b>				
U.S. producers' U.S. shipments.-- Fully domestic value	***	***	***	***	***
Value added by finishers	***	***	***	***	***
Total	31.1	28.2	25.6	26.0	26.9
U.S. importers' U.S. shipments from.-- China	19.7	24.1	24.3	23.8	23.5
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	49.2	47.7	50.1	50.1	49.6
All import sources	68.9	71.8	74.4	74.0	73.1

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.

# Part V: Pricing data

## Factors affecting prices

### Raw material costs

The primary raw material input in the production of WMMP is lumber, whether rough or already processed into blanks.<sup>1</sup> Several grades of lumber are used by domestic producers, including, but not limited to, #1 through #3 shop lumber, FJ Common lumber, stain shop lumber, COL, and P99 shop lumber.<sup>2 3</sup>

Raw materials accounted for the largest share of the cost of goods sold (“COGS”) during January 2017-June 2020. Between 2017 and 2019, raw materials as a share of total COGS decreased from \*\*\* percent to \*\*\* percent. Raw materials as a share of total COGS during January-June 2020 were \*\*\* percent.

As shown in figure V-1, the price indexes of various lumber and wood products followed similar trends from January 2017 to October 2020. The prices for these inputs generally increased between January 2017 and June 2018, then either decreased or remained stable until February 2020. Beginning in March/April 2020, prices increased substantially until September 2020, then decreased in October-November 2020.

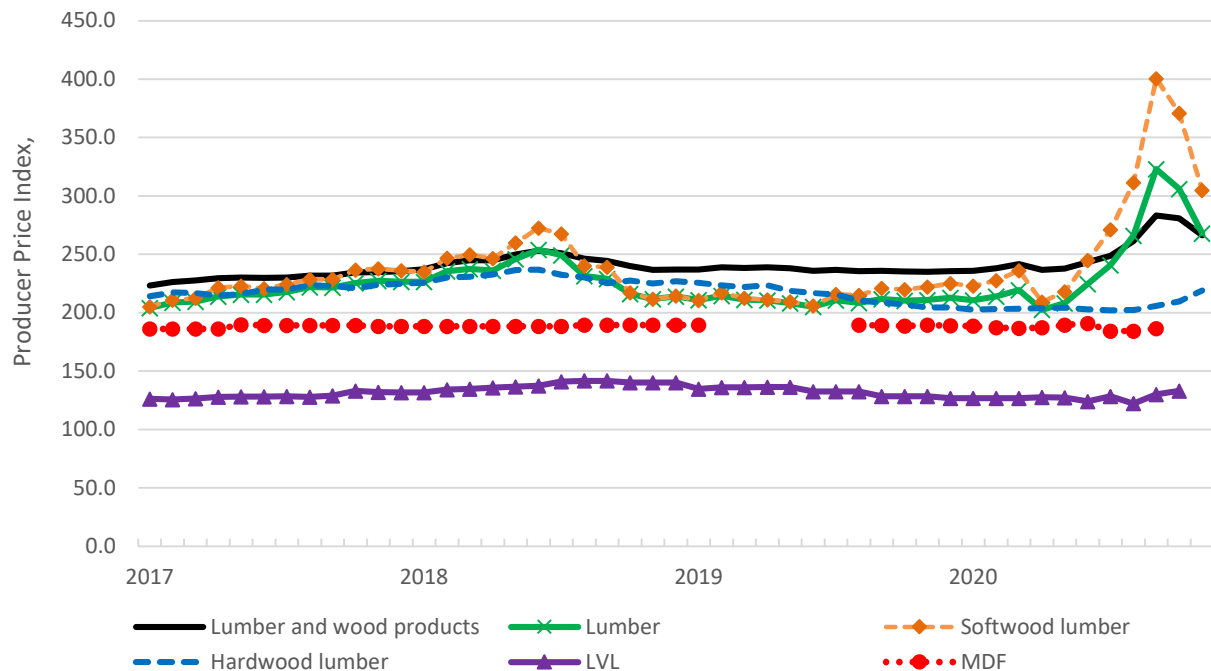
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<sup>1</sup> Conference transcript, p. 32 (Easton) and p. 50 (Procton).

<sup>2</sup> COL (“cut on log” or “cut of log”) lumber is a pine grade lumber, typically considered cuttings grade or industrial grade, and is often used in remanufacturing work or in furniture. *Pan Pac Forest Products website*, <https://www.panpac.co.nz/Lumber/Product+Range.html>, accessed January 7, 2021; *Palm Trade Chile website*, <http://palmtradechile.com/en/project/col-lumber/>, accessed January 7, 2021.

<sup>3</sup> Respondent Shamrock testified that “the domestic industry, for the most part, they’re using a lower grade, called P99 or three stock out of the pine.” Hearing transcript, pp. 199-200 (Ammons). Petitioners stated that they used several different kinds of lumber to make WMMP during the period of investigation, and “\*\*\*.” Email from \*\*\*, January 5, 2021.

**Figure V-1**  
**Raw material prices: Producer Price Index by Commodity: Lumber and Wood Products, Lumber, Softwood Lumber, and Hardwood Lumber (Index 1982=100), LVL (Index Dec 2003=100), and MDF (Index Jun 1984=100), Monthly, Not Seasonally Adjusted, January 2017-November 2020**



Note: Prices for LVL were only available through October 2020, and prices for MDF were only available through September 2020.

Source: U.S. Bureau of Labor Statistics via the Federal Reserve Bank of St. Louis, <https://fred.stlouisfed.org/searchresults?st=producer+price+index+lumber>, retrieved December 30, 2020.

Most U.S. producers (10 of 15 firms) reported that raw material prices fluctuated since January 2017; 5 firms reported that they increased, and one firm (\*\*\*) reported that they decreased.<sup>4</sup> Most importers (21 of 39 firms) reported that raw material prices increased since January 2017, while 12 reported that they fluctuated, 4 reported that they decreased, and 2 reported that they did not change.

<sup>4</sup> \*\*\* reported that raw material prices both decreased and fluctuated, stating that “raw material prices have not come down in parallel to moulding prices.”

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

Transportation costs for WMMP shipped from China to the United States averaged 11.4 percent during 2019. Transportation costs for WMMP shipped from Brazil and Chile to the United States averaged 7.1 percent and 6.6 percent, respectively, during 2019. These estimates were derived from official import data and represent the transportation and other charges on imports.<sup>5</sup>

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

Most firms (including 14 of 15 U.S. producers and 35 of 40 importers) reported that they typically arrange transportation to their customers. Most U.S. producers reported that their U.S. inland transportation costs ranged from 0.3 to 10.0 percent, for an average of 5.1 percent, while most importers reported costs of 0.7 to 30.0 percent, for an average of 6.8 percent.<sup>6</sup>

## **Exchange rate**

Between January 2017 and December 2019, the Chinese Yuan depreciated against the U.S. dollar by 1.8 percent (table V-2).<sup>7</sup> Between December 2019 and June 2020, the value of the Chinese Yuan decreased by 1.0 percent. Between June and November of 2020, the value of the Chinese Yuan increased by 6.8 percent.

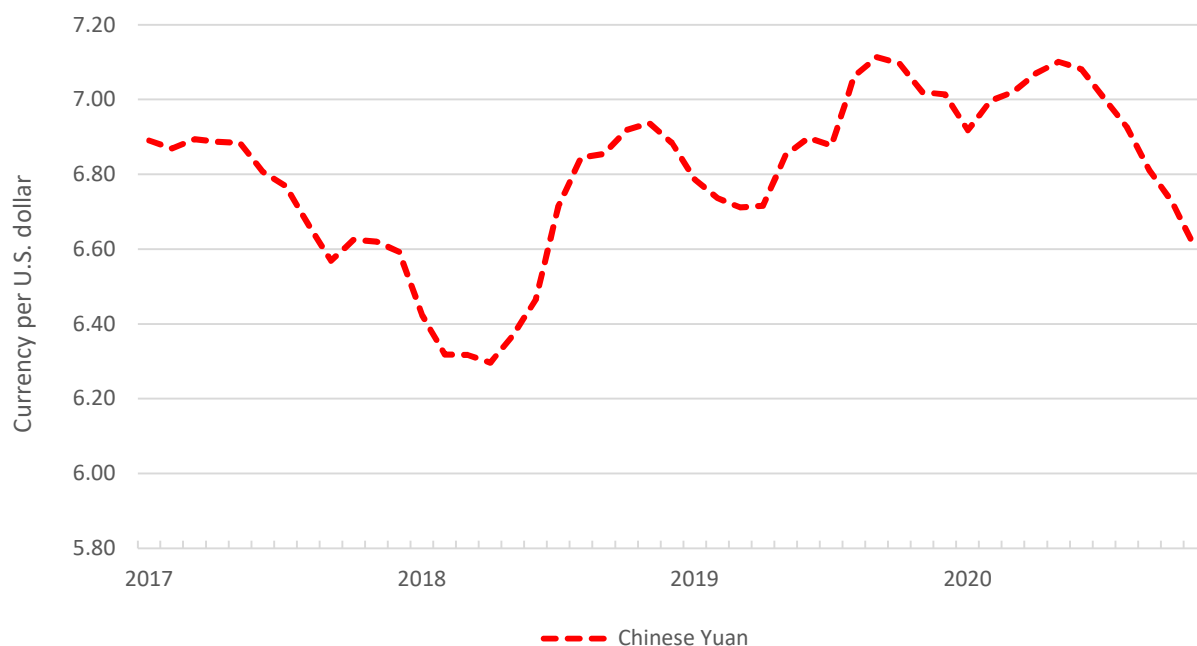
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<sup>5</sup> The estimated transportation costs were obtained by subtracting the customs value from the c.i.f. value of the imports for 2019 and then dividing by the customs value based on the HTS subheadings 4409.10.4010, 4409.10.4090, 4409.10.4500, 4409.10.5000, 4409.22.4000, 4409.22.5000, 4409.29.4100, and 4409.29.5100. Data accessed October 27, 2020.

<sup>6</sup> Two U.S. producers and two importers reported transportation costs of 0.0 percent, and one U.S. producer and two importers reported transportation costs of 100.0 percent. These data were removed from the dataset due to a likely misunderstanding of the question.

<sup>7</sup> When a currency depreciates relative to another currency, that means the value of that currency decreases, or its exchange rate (as presented in figure V-2) increases. When a currency appreciates, its value increases, or its exchange rate decreases.

**Figure V-2**  
**Exchange rate: Spot exchange rate of the Chinese Yuan to the U.S. dollar, monthly, January 2017- November 2020**



Source: The Federal Reserve, <https://www.federalreserve.gov/releases/h10/current/>, retrieved December 30, 2020.

## Pricing practices

### Pricing methods

U.S. producers and importers reporting using various methods to set prices. Most U.S. producers and importers reported setting prices using transaction-by-transaction negotiations, with the next highest number using set price lists (table V-1).

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

Method	U.S. producers	Importers
Transaction-by-transaction	11	36
Contract	4	7
Set price list	6	12
Other	2	6
Responding firms	15	41

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.



At the hearing, Endura testified that “prices are generally communicated via direct communication... {and that} Random Lengths will give general lumber pricing... but for the finished goods it’s pretty much the direct communication, the quote, you may establish a program with a customer. Sometimes we have a price list that’s in effect on certain items from time to time... but that will move with the market if one can get one's costs accounted for.” Woodgrain testified that “in our experience it’s direct communication. We don’t have published price lists or other means to communicate.” Sierra Pacific testified that “our sales staff is directed to always try to get the most that they can out of their--out of the sales team to make the company profitable.”<sup>8</sup> Metrie testified that “I would never share pricing with one supplier against another, {but} would we be able to get a better price and use negotiation by pitting one mill against another mill? Sure, we could do that.” When asked to clarify not whether it could do that, but whether it had, Metrie testified “yes.”<sup>9</sup>

U.S. producers reported selling almost half of their WMMP in the spot market and \*\*\* (table V-2). They also reported selling \*\*\*. Importers of WMMP from China also reported selling almost half of their product in the spot market, with \*\*\* percent being sold \*\*\*, \*\*\* percent \*\*\*, and \*\*\* percent \*\*\*.

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

Type of sale	U.S. producers	Importers (China)
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.

For their short-term contracts, U.S. producers reported average durations ranging from 28 to 180 days, while importers reported average durations ranging from 1 to 180 days. For U.S. producers’ short-term contracts, two reported that prices could be renegotiated and two

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<sup>8</sup> Hearing transcript, pp. 129-130 (Procton, Easton, Carroll).

<sup>9</sup> Metrie further testified that it does not use Brazilian prices to try to obtain a lower domestic price, even though it believes domestic WMMP to be of lower quality than Brazilian WMMP. “We do pay more for the product that we buy from U.S. manufacturers. Absolutely.” Hearing transcript, pp. 241-245 (Burke).

reported that they could not; two reported that the contracts fixed price, one reported that they fixed quantity, and two reported that they fixed both price and quantity; and all four responding firms reported that their short-term contract prices were not indexed to raw material costs. For importers, most (9 of 13 firms) reported that their short-term contracts did not allow for price renegotiations; seven reported that they fixed price, one reported that they fixed quantity, and four reported that they fixed both price and quantity; and most (10 of 11 firms) reported that their short-term contract prices were not indexed to raw material costs.

\*\*\* reported that \*\*\*. Among importers, most (5 of 9 firms) reported that their annual contracts did not allow for price renegotiations, all reported that they either fixed price or fixed both price and quantity; and most (5 of 7 firms) reported that their annual contract prices were not indexed to raw material costs.

For its long-term contracts, the sole responding importer's average contract duration was \*\*\*. Two of 3 responding importers reported that prices could be renegotiated during their long-term contracts, both reported that prices were fixed, and both reported that their long-term contract prices were not indexed to raw material costs.

When asked whether they were familiar with the prices for raw material used in the production of WMMP, most purchasers (25 of 47 firms) reported that they were. When asked whether the information on raw material prices affected their negotiations or contracts to purchase WMMP since January 2017, a slight majority of purchasers (19 of 36 firms)<sup>10</sup> reported that they did not. In describing how raw material prices affected their negotiations or contracts, several firms indicated that they monitor raw material prices to ensure that their WMMP negotiations and contracts are in line with market prices. Several firms also reported that WMMP prices have increased as a result of increased raw material prices. One firm reported that raw material prices can be volatile and fluctuating and that its WMMP contracts have become shorter as a result.

Seventeen purchasers reported that they purchase product daily, 23 purchase weekly, 8 purchase monthly, and 1 purchases quarterly. Only two of 46 responding purchasers reported that their purchasing frequency had changed since January 1, 2017, and both firms reported that their purchasing frequency had increased; one stated that this was due to an increase in the number of its distribution centers, and the other stated that it was due to volatility in the

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<sup>10</sup> One firm, \*\*\*, reported both yes and no, but did not elaborate.

pricing and availability of WMMP. Most (33 of 44) purchasers contact between 1 and 5 suppliers before making a purchase.

## **Sales terms and discounts**

Most U.S. producers (12 of 15) and importers (27 of 38) typically quote prices on a delivered basis.<sup>11</sup>

Several types of discounts are offered by U.S. producers and importers, and many offer more than one type of discount. Seven of 14 U.S. producers offer quantity discounts, 4 offer total volume discounts, and 4 offer other types of discounts, mostly involving discounts for prompt payment (typically within 10 days). One U.S. producer also offers rebate programs for select customers. Four U.S. producers reported having no specific discount policy. Among importers, 23 reported having no specific discount policy, 11 offer quantity discounts, 12 offer total volume discounts, and 8 offer other types of discounts. These other discounts include discounts for prompt payment, discounts on payments made within terms, rebate programs, and temporary promotions.

## **Price leadership**

Purchasers reported the following firms as price leaders: Arauco (Chile) (cited by 8 firms); Sierra Pacific (United States) (6 firms); Braspine/Braslumber (Brazil) (5 firms); Woodgrain (Chile and the United States) (4 firms); Endura (United States) and Yuba River (United States) (2 firms each); and Araupel (Brazil), Boise Cascade (United States), Cedar Creek (United States), CMPC (Chile), ECMD (United States), Metrie (United States), Jacm Forest Products (Brazil), Randa (Brazil), Solida (Brazil), and Southwest Moulding (United States) (1 firm each). Purchasers generally described Sierra Pacific, Woodgrain, Endura, Arauco, Braspine/Braslumber, and Solida as being first movers on price changes, and Woodgrain, Sierra Pacific, Braspine/Braslumber, and Solida influencing prices through their large market shares.

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<sup>11</sup> One U.S. producer and two importers reported quoting prices on both a delivered and f.o.b. basis.

## Price data

In its initial final phase questionnaires, the Commission requested U.S. producers and importers to provide quarterly data for the total quantity and f.o.b. value of the following WMMP products shipped to unrelated U.S. customers during January 2017-June 2020:

**Product 1.**--Finger-jointed lineal board, made of pine/fir, with dimensions of 23/32" x 5-1/2", S4S, primed or coated.

**Product 2.**--Finger-jointed lineal trim, made of pine/fir, nominal 11/16" x nominal 2-1/4", WM356 casing, primed or coated.

**Product 3.**--Finger-jointed lineal trim, made of pine/fir, 11/16" x 11/16", WM-106, primed or coated.

**Product 4.**--Jamb: Exterior door frame, made of pine/fir, nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dados for threshold and head attachment, primed or coated, without a composite or otherwise rot-proof bottom.

**Product 5.**--Jamb: Adjustable interior door frame (split jambs), made of pine/fir, consisting of two pieces, one called female and the other called male, nominally 1-1/16" thick x nominal 4-9/16" width x nominal 7' long and machined with end top dado for threshold and head attachment, primed or coated.

**Product 6.**--Brick moulding: Casing, made of pine/fir, that attaches to exterior edge of door frame, nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated, without a composite or otherwise rot-proof bottom.

Firms that reported shipments of LVL product in their initial final phase questionnaires were asked to complete an additional questionnaire with supplemental pricing data for the following LVL product:<sup>12</sup>

**Product 7.**--LVL 11/16" x 11/16" quarter-round.

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<sup>12</sup> Pricing products 1-3 and 7 were collected in lineal board feet. Pricing products 4-6 were collected in number of units.

Seven U.S. producers and 13 importers provided usable pricing data for sales of the requested products, although not all firms reported pricing for all products for all quarters.<sup>13 14</sup> Pricing data reported by these firms accounted for approximately \*\*\* percent of the value of U.S. producers' shipments of WMMP and \*\*\* percent of the value of U.S. shipments of subject imports from China in 2019.

Price data for products 1-7 from the United States and China are presented in tables V-3 to V-9 and figures V-3 to V-9. Price data for nonsubject countries Brazil and Chile are presented in Appendix D.

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<sup>13</sup> Per-unit pricing data are calculated from total quantity and total value data provided by U.S. producers and importers. The precision and variation of these figures may be affected by rounding, limited quantities, and producer or importer estimates.

<sup>14</sup> Some firms submitted data that did not comport with the requested pricing product descriptions. These data have not been included in this pricing analysis. Other firms reported aberrant or inconsistent data. Where possible, these data have been revised and/or removed.

**Table V-3**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 1 and product 1 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per lineal foot)	Quantity (lineal feet)	Price (dollars per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 1: Finger-jointed lineal board, made of pine/ fir, with dimensions of 23/32" x 5- 1/2", S4S, primed or coated.

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

**Table V-4**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 2 and product 2 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per lineal foot)	Quantity (lineal feet)	Price (dollars per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 2: Finger-jointed lineal trim, made of pine/fir, nominal 11/16" x nominal 2-1/4", WM356 casing, primed or coated.

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

**Table V-5**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 3 and product 3 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per lineal foot)	Quantity (lineal feet)	Price (dollars per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 3: Finger-jointed lineal trim, made of pine/fir, 1 1/16" x 1 1/16", WM-106, primed or coated.

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



**Table V-6**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 4 and product 4 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per unit)	Quantity (units)	Price (dollars per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 4: Jamb: Exterior door frame, made of pine/fir, nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dadoes for threshold and head attachment, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Table V-7**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 5 and product 5 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per unit)	Quantity (units)	Price (dollars per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 5: Jamb: Adjustable interior door frame (split jambs), made of pine/fir, consisting of two pieces, one called female and the other called male, nominally 1-1/16" thick x nominal 4-9/16" width x nominal 7' long and machined with end top dado for threshold and head attachment, primed or coated.

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

**Table V-8**

**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 6 and product 6 imported from China and margins of underselling/(overselling), by quarter, January 2017-June 2020**

Period	United States		China		
	Price (dollars per unit)	Quantity (units)	Price (dollars per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2018:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2019:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***
July-September	***	***	***	***	***
October-December	***	***	***	***	***
<b>2020:</b>					
January-March	***	***	***	***	***
April-June	***	***	***	***	***

Note: Product 6: Brick moulding: Casing, made of pine/fir, that attaches to exterior edge of door frame, nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Table V-9**

**WMMP: Weighted-average f.o.b. prices and quantities of product 7 imported from China, by quarter, January 2017-June 2020**

Period	China	
	Price (dollars per lineal foot)	Quantity (lineal feet)
<b>2017:</b>		
January-March	***	***
April-June	***	***
July-September	***	***
October-December	***	***
<b>2018:</b>		
January-March	***	***
April-June	***	***
July-September	***	***
October-December	***	***
<b>2019:</b>		
January-March	***	***
April-June	***	***
July-September	***	***
October-December	***	***
<b>2020:</b>		
January-March	***	***
April-June	***	***

Note: Product 7: LVL 11/16" x 11/16" quarter-round.

Note: No domestic producer reported pricing data for product 7.

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

**Figure V-3**

**WMMP: Weighted-average prices and quantities of domestic product 1 and product 1 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 1: Finger-jointed lineal board, made of pine/ fir, with dimensions of 23/32" x 5- 1/2", S4S, primed or coated.

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

**Figure V-4**

**WMMP: Weighted-average prices and quantities of domestic product 2 and product 2 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 2: Finger-jointed lineal trim, made of pine/fir, nominal 11/16" x nominal 2-1/4", WM356 casing, primed or coated.

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

**Figure V-5**

**WMMP: Weighted-average prices and quantities of domestic product 3 and product 3 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 3: Finger-jointed lineal trim, made of pine/fir, 11/16" x 11/16", WM-106, primed or coated.

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

**Figure V-6**  
**WMMP: Weighted-average prices and quantities of domestic product 4 and product 4 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 4: Jamb: Exterior door frame, made of pine/fir, nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dadoses for threshold and head attachment, primed or coated, without a composite or otherwise rot-proof bottom.

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



**Figure V-7**

**WMMP: Weighted-average prices and quantities of domestic product 5 and product 5 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 5: Jamb: Adjustable interior door frame (split jambs), made of pine/fir, consisting of two pieces, one called female and the other called male, nominally 1-1/16" thick x nominal 4-9/16" width x nominal 7' long and machined with end top dado for threshold and head attachment, primed or coated.

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

**Figure V-8**  
**WMMP: Weighted-average prices and quantities of domestic product 6 and product 6 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 6: Brick moulding: Casing, made of pine/fir, that attaches to exterior edge of door frame, nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Figure V-9**  
**WMMP: Weighted-average prices and quantities of product 7 imported from China, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 7: LVL 11/16" x 11/16" quarter-round.

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

## Price trends

Table V-10 summarizes the price trends, by country and by product. As shown in the table, domestic prices increased for products 1-4 and decreased for products 5 and 6 during January 2017-June 2020. No domestic price data were reported for product 7. Prices for imported WMMP from China increased for products 1, 2, 4, 5, 6, and 7, and decreased for product 3. Domestic price increases ranged from \*\*\* percent (\*\*\*) to \*\*\* percent (\*\*\*), while import price increases ranged from \*\*\* percent (\*\*\*) to \*\*\* percent (\*\*\*). Domestic price decreases ranged from \*\*\* percent (\*\*\*) to \*\*\* percent (\*\*\*), and import prices decreased by \*\*\* percent (\*\*\*)).

**Table V-10**  
**WMMP: Summary of weighted-average f.o.b. prices for products 1-6 from the United States and China**

Item	Number of quarters	Low price (dollars per lineal foot)	High price (dollars per lineal foot)	Change in price (percent)
<b>Product 1</b>				
United States	14	***	***	***
China	14	***	***	***
<b>Product 2</b>				
United States	14	***	***	***
China	14	***	***	***
<b>Product 3</b>				
United States	14	***	***	***
China	14	***	***	***
<b>Product 7</b>				
United States	***	***	***	***
China	***	***	***	***
Item	Number of quarters	Low price (dollars per unit)	High price (dollars per unit)	Change in price (percent)
<b>Product 4</b>				
United States	14	***	***	***
China	14	***	***	***
<b>Product 5</b>				
United States	14	***	***	***
China	14	***	***	***
<b>Product 6</b>				
United States	14	***	***	***
China	14	***	***	***

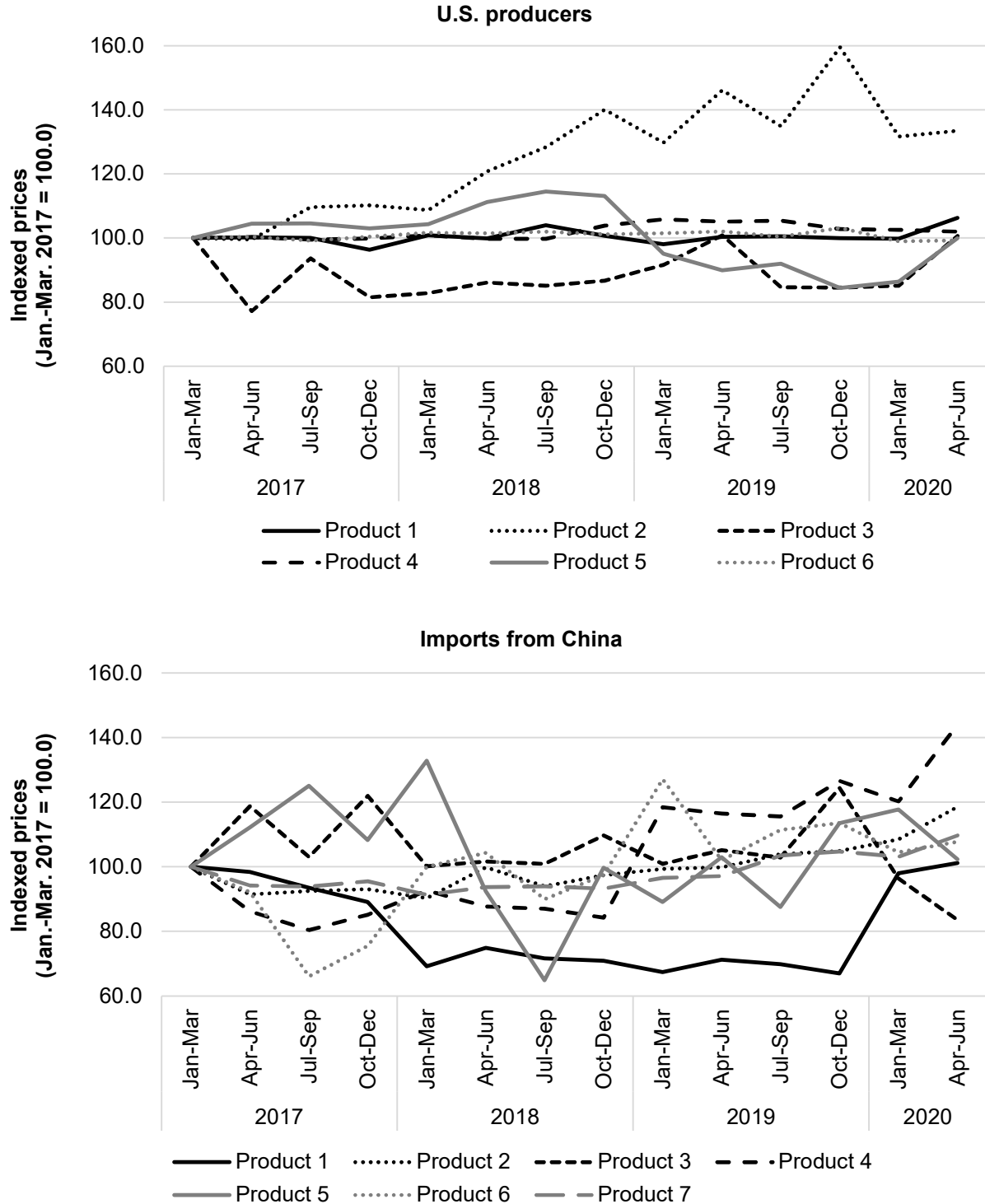
Note: Pricing products 1-3 and 7 were collected in lineal board feet. Pricing products 4-6 were collected in number of units.

Note: Percentage change from the first quarter in which data were available to the last quarter in which price data were available.

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

As shown in figure V-10, in general, prices for imported WMMP from China fluctuated more than U.S. producer prices.

**Figure V-10**  
**WMMP: Indexed U.S. producer and Chinese WMMP prices, January 2017-June 2020**



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

Industry price data from \*\*\* indicates that on average, prices for selected wood moulding products decreased by \*\*\* percent between January 2017 and June 2020, and increased by \*\*\* percent between June 2020 and December 2020 (figure V-11).

**Figure V-11**  
**Wood moulding prices: Producer prices, select products, net f.o.b. mill or dock, by month, January 2017-December 2020**

\* \* \* \* \*

Note: \*\*\*.

Source: \*\*\*, accessed December 22, 2020.

### **Price comparisons**

As shown in table V-11, prices for product imported from China were below those for U.S.-produced product in 53 of 84 instances (approximately \*\*\* lineal feet and \*\*\* units); margins of underselling ranged from 3.2 to 56.3 percent, for an average of 28.3 percent. Prices for product imported from China were above those for U.S.-produced product in

the remaining 31 instances (approximately \*\*\* lineal board feet and \*\*\* units); margins of overselling ranged from 1.8 to 166.2 percent, for an average of 60.2 percent.

**Table V-11**  
**WMMP: Instances of underselling and overselling and the range and average of margins, by pricing product, January 2017-June 2020**

Product	Underselling				
	Number of quarters	Quantity (lineal feet)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 7	***	***	***	***	***
Subtotal, underselling	***	***	***	***	***
Product	Number of quarters	Quantity (units)	Average margin (percent)	Margin range (percent)	
				Min	Max
	Product 4	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Subtotal, underselling	***	***	***	***	***
Total, underselling	53	NA	28.3	3.2	56.3
Product	Overselling				
	Number of quarters	Quantity (lineal feet)	Average margin (percent)	Margin range (percent)	
				Min	Max
Product 1	***	***	***	***	***
Product 2	***	***	***	***	***
Product 3	***	***	***	***	***
Product 7	***	***	***	***	***
Subtotal, overselling	***	***	***	***	***
Product	Number of quarters	Quantity (units)	Average margin (percent)	Margin range (percent)	
				Min	Max
	Product 4	***	***	***	***
Product 5	***	***	***	***	***
Product 6	***	***	***	***	***
Subtotal, overselling	***	***	***	***	***
Total, overselling	31	NA	(60.2)	(1.8)	(166.2)

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

Note: The total quantity of underselling or overselling for products 1-3 and 7 and 4-6 combined is not computable, as data were collected in different units.

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

## Lost sales and lost revenue

In the preliminary phase of the investigations, the Commission requested that U.S. producers of WMMP report purchasers with which they experienced instances of lost sales or revenue due to competition from imports of WMMP from Brazil and China during January 2016-September 2019. Of the 12 responding U.S. producers, ten reported that they had to either reduce prices or roll back announced price increases, and ten firms reported that they had lost sales. Three U.S. producers submitted lost sales and lost revenue allegations. \*\*\* submitted allegations consisting mostly of either lost sales or combined lost sales/lost revenue, with total lost sales and lost revenue of \$\*\*\*. \*\*\* submitted allegations that \*\*\*.

In the final phase of the investigations, 11 of 15 responding U.S. producers reported that they had to reduce prices, and 7 of 13 reported that they had to roll back announced price increases. Eleven of 15 firms also reported that they had lost sales.

Staff reached out to approximately 160 purchasers and received responses from 47 purchasers. Among the firms responding to the purchaser questionnaire, they reported purchasing and importing 5.3 billion board feet of WMMP during January 2017-June 2020 (table V-12).

**Table V-12**  
**WMMP: Purchasers' reported purchases and imports, January 2017-June 2020**

Purchaser	Purchases and imports in January 2017- June 2020 (1,000 board feet)				Change in domestic share (pp, 2017- 19)	Change in China share (pp, 2017- 19)	Change in Brazil share (pp, 2017- 19)
	Domestic	China	Brazil	All other			
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***
***	***	***	***	***	***	***	***

Table continued on next page.





Of 39 responding purchasers, 26 reported that they had purchased imported WMMP from China instead of U.S.-produced product since 2017; 13 reported that they had not (table V-13). Twenty-two of these purchasers reported that prices of imported WMMP from China were lower than U.S.-produced product, and 13 of 27 purchasers reported that price was a primary reason for the decision to purchase imported product from China rather than U.S.-produced product. Eight purchasers estimated the quantity of WMMP purchased from China instead of domestic product; quantities ranged from 13,000 board feet to approximately 30 million board feet, for a total of 54.2 million board feet (table V-13).<sup>15</sup> Purchasers identified the following non-price reasons for purchasing imported rather than U.S.-produced product: availability, insufficient domestic capacity, better overall quality from China, superior quality of primed WMMP from China, insufficient capacity or lack of availability of LVL from domestic producers, better quality and availability of gesso-coated product from China, and better packaging and service from China.

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<sup>15</sup> Petitioners argue that this is likely a low estimate, given that some of the firms that reported purchasing subject imports instead of domestic product did not report any quantities for the amount of subject product they purchased instead of domestic product. Petitioners' prehearing brief, pp. 55-56, 93-94, and exhibit 5.

Respondent ABIMCI argues that the lost sales allegations do not support a conclusion that subject imports caused adverse price effects, given that the majority of the reported lost sales volume comes from just one purchaser, \*\*\*. ABIMCI's posthearing brief, p. 16, and Responses to Commissioner Questions, pp. 7-9. See also M&G's posthearing brief, p. 6.







**Table V-14--Continued**  
**WMMP: Purchasers' responses to U.S. producer price reductions**

Purchaser	U.S. producers reduced prices to compete with imports from China (Y/N)	If U.S. producers reduced prices	
		Estimated U.S. price reduction (percent)	Additional information, if available
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
***	***	***	***
Total / average	Yes--1; No--13; Don't Know--28	***	

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

Several purchasers provided additional information on purchases and market dynamics. Some purchasers reported a limited ability of U.S. producers to provide enough WMMP to fulfill all demand in the U.S. market. \*\*\* stated that there is “not enough production available globally of certain products to satisfy U.S. demand without China.” \*\*\* stated that “there is very little LVL produced in the USA that can be used for our product. Most domestic manufacturers produce plywood instead of LVL that satisfies the requirements for our products.”

Others reported that there was limited availability and/or low quality from domestic producers for certain product types. \*\*\* stated that “LVL is almost exclusively produced in Asia, with the exception of a very small capacity in the United States. U.S.-based LVL is produced out of species that are significantly higher cost than our customers require and production capacity in the United States is nearly non-existent in commercial quantities... Similar domestic supplier capacity constraints are in place for pine millwork products.” \*\*\* reported that its customers demand “a thicker gesso coat finish that is only supplied out of Asia. \*\*\* stated that gesso-coated and primed poplar wood mouldings of suitable quality are not available from domestic producers in the quantities and quality levels

that it requires. \*\*\* stated that domestic mills have inferior priming compared to Brazil for window manufacturers who require primed jamb extensions.

Firms also provided the following additional information: \*\*\* reported that “most U.S. manufacturers produce the lowest quality moulding and millwork available in the US market, {and that} there have been no improvements in machining or finishing technology from most U.S. moulding manufacturers in decades.” \*\*\* stated that \*\*\*





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

## Background

Fifteen firms provided usable financial results on their operations.<sup>1</sup> All firms reported financial results on WMMP production. Five firms reported financial results on finishing operations in addition to their WMMP production.<sup>2</sup> Finishing operations accounted for \*\*\* percent and \*\*\* percent of combined net sales quantity and value, respectively. In 2019, \*\*\* accounted for \*\*\* percent of the net sales quantity of WMMP production (excluding finishing only operations), \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, and all other firms accounted for \*\*\* percent.<sup>3</sup> Net sales consisted of commercial sales, transfers to related firms, and internal consumption, which accounted for \*\*\* percent, \*\*\* percent, and \*\*\* percent of the combined net sales quantity in 2019, respectively.<sup>4</sup>

Staff conducted a verification of \*\*\*'s U.S. producer questionnaire. The verification adjustments were incorporated into this report. \*\*\*.<sup>5</sup>

## Operations on WMMP

Income-and-loss data for WMMP production for U.S. producers are presented in table VI-1. Table VI-2 presents corresponding changes in average per board foot values from table VI-1 between fiscal years and partial year periods. Income-and-loss data for combined U.S.

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<sup>1</sup> All responding U.S. producers except \*\*\* reported financial data on the basis of generally accepted accounting principles ("GAAP"). \*\*\* used tax as its accounting basis. The producers with fiscal year ends other than December 31 are \*\*\*.

<sup>2</sup> Finishing operations refer to the production of WMMP using domestically purchased and/or imported wood blanks. \*\*\*.

<sup>3</sup> \*\*\* accounted for \*\*\* percent of the net sales value of WMMP production (excluding finishing only operations), \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, \*\*\* accounted for \*\*\* percent, and all other firms accounted for \*\*\* percent in 2019.

<sup>4</sup> \*\*\* reported transfers to related firms and \*\*\* reported internal consumption.

<sup>5</sup> Staff verification report, \*\*\*, December 11, 2020.

operations (U.S producers and finishers) are presented in table VI-3. Table VI-4 presents corresponding changes in average per board foot values from table VI-3 between fiscal years and partial year periods. Table VI-5 presents selected company-specific financial data.

**Table VI-1**

**WMMP: Results of operations of U.S. producers, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
<b>Quantity (1,000 board feet)</b>					
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
<b>Value (1,000 dollars)</b>					
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
All other expenses, net	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Cash flow	***	***	***	***	***
<b>Ratio to net sales (percent)</b>					
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

Table continued on next page.

Table VI-1—Continued

WMMP: Results of operations of U.S. producers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Ratio to total COGS (percent)</b>				
Cost of goods sold before by-product offset.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	<b>Number of firms reporting</b>				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

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

**Table VI-2**

**WMMP: Changes in AUVs, between fiscal years and between partial year periods**

Item	Between fiscal years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
<b>Change in AUVs (percent)</b>				
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***
Direct labor	***	***	***	***
Other factory costs	***	***	***	***
Less: by-product revenue	***	***	***	***
Average COGS	***	***	***	***
<b>Change in AUVs (dollars per board foot)</b>				
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***
Direct labor	***	***	***	***
Other factory costs	***	***	***	***
Less: by-product revenue	***	***	***	***
Average COGS	***	***	***	***
Gross profit	***	***	***	***
SG&A expense	***	***	***	***
Operating income or (loss)	***	***	***	***
Net income or (loss)	***	***	***	***

Note.--Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" percent.

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

Table VI-3

WMMP: Results of operations of U.S. producers and finishers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
All other expenses, net	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Cash flow	***	***	***	***	***
	<b>Ratio to net sales (percent)</b>				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

Table continued on next page.

Table VI-3—Continued

WMMP: Results of operations of U.S. producers and finishers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Ratio to total COGS (percent)</b>				
Cost of goods sold before by-product offset.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Average COGS	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	<b>Number of firms reporting</b>				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

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

**Table VI-4**

**WMMP: Changes in AUVs of U.S. producers and finishers, between fiscal years and between partial year periods**

Item	Between fiscal years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	<b>Change in AUVs (percent)</b>			
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	***	***	***	***
Cost of goods sold.--				
Raw materials	***	***	***	***
Direct labor	***	***	***	***
Other factory costs	***	***	***	***
Less: by-product revenue	***	***	***	***
Average COGS	***	***	***	***
	<b>Change in AUVs (dollars per board foot)</b>			
Commercial sales	***	***	***	***
Internal consumption	***	***	***	***
Transfers to related firms	***	***	***	***
Total net sales	***	***	***	***
Cost of goods sold.--				
Raw materials	***	***	***	***
Direct labor	***	***	***	***
Other factory costs	***	***	***	***
Less: by-product revenue	***	***	***	***
Average COGS	***	***	***	***
Gross profit	***	***	***	***
SG&A expense	***	***	***	***
Operating income or (loss)	***	***	***	***
Net income or (loss)	***	***	***	***

Note.--Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" percent.

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

Table VI-5

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Total net sales (1,000 board feet)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Total net sales (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Cost of goods sold (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

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Table VI-5—Continued

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Gross profit or (loss) (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>SG&amp;A expenses (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Operating income or (loss) (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

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Table VI-5—Continued

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Net income or (loss) (1,000 dollars)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>COGS to net sales ratio (percent)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Gross profit or (loss) to net sales ratio (percent)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

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Table VI-5—Continued

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>SG&amp;A expense to net sales ratio (percent)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Operating income or (loss) to net sales ratio (percent)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Net income or (loss) to net sales ratio (percent)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

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Table VI-5—Continued

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Unit net sales value (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit raw materials (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit direct labor (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit other factory costs (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

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Table VI-5—Continued

WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Unit by-product revenue (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit COGS (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit gross profit or (loss) (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit SG&amp;A expenses (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

Table continued on next page.

**Table VI-5—Continued**

**WMMP: Select results of operations of U.S. producers and finishers, by company, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Unit operating income or (loss) (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***
	<b>Unit net income or (loss) (dollars per board foot)</b>				
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
***	***	***	***	***	***
All other producers	***	***	***	***	***
All producers	***	***	***	***	***
All finishers	***	***	***	***	***
U.S. producers and finishers combined	***	***	***	***	***

Note.--Shares and ratios shown as "0.00" represent values greater than zero, but less than "0.005" percent.

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

## Net sales

As shown in table VI-5, U.S. producers reported declining net sales, by quantity and value while finishers reported increasing net sales, by quantity and value, from 2017 to 2019. \*\*\* reported overall decreasing net sales, by quantity and value, from 2017 to 2019.<sup>6</sup> U.S. producers reported higher net sales, by quantity and value in January-June 2020 compared to January-June 2019. Finishers reported higher net sales quantity and lower net sales value in January-June 2020 compared to January-June 2019. \*\*\* reported higher net sales, by quantity and value in January-June 2020 compared to January-June 2019.

<sup>6</sup> \*\*\*. Email from \*\*\*, November 19, 2020.

U.S. producers and finishers reported overall increasing net sales value per board foot from 2017 to 2019, but lower net sales value per board foot in January-June 2020 compared to January-June 2019. U.S. producers reported lower net sales values per board foot than finishers.<sup>7</sup> \*\*\* reported an overall increase in net sales value per board foot from 2017 to 2019, while \*\*\* reported a decline in net sales value per board foot from 2017 to 2018 before returning to the 2017 level in 2019. \*\*\* reported a lower net sales value per board foot while \*\*\* reported a higher net sales value per board foot in January-June 2020 compared to January-June 2019. \*\*\* reported notably higher net sales values per board foot than the rest of the largest U.S. producers throughout the reporting period.<sup>8</sup> Net sales per board foot values for internal consumption and transfers to related firms are lower than commercial sales.<sup>9</sup>

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

As shown in table VI-1, U.S. producers reported that their average COGS to net sales ratio irregularly increased from \*\*\* percent in 2017 to \*\*\* percent in 2019, but was lower in January-June 2020 (\*\*\* percent) compared to January-June 2019 (\*\*\* percent). As shown in table VI-5, finishers reported that their average COGS to net sales ratio irregularly increased from \*\*\* percent in 2017 to \*\*\* percent in 2019 but was lower in January-June 2020 (\*\*\* percent) compared to January-June 2019 (\*\*\* percent).

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<sup>7</sup> \*\*\*. Email from \*\*\*, November 23, 2020.

<sup>8</sup> \*\*\*. Email from \*\*\*, November 19, 2020.

<sup>9</sup> \*\*\*. Email from \*\*\*, November 19, 2020. \*\*\*. Email from \*\*\*, November 19, 2020.

Raw material costs represented the largest component of COGS for both U.S producers and finishers. With respect to U.S. producers, raw material costs accounted for between \*\*\* percent (in January-June 2019) and \*\*\* percent (in 2017) of total COGS during the reporting period (see table VI-1). For finishers, raw materials accounted for between \*\*\* percent (in January-June 2020) and \*\*\* percent (in January-June 2019) of total COGS during the reporting period.<sup>10</sup> As shown in table VI-5, the average raw material costs per board foot for U.S. producers irregularly increased from \$\*\*\* in 2017 to \$\*\*\* in 2019, but were lower in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*). The average raw material costs per board foot for finishers irregularly increased from \$\*\*\* in 2017 to \$\*\*\* in 2019 but were lower in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*). Of the largest U.S. producers, \*\*\* reported overall increasing raw material costs per board foot from 2017 to 2019 while \*\*\* reported overall declining raw material costs per board foot. All the largest U.S. producers \*\*\* reported lower raw material costs per board foot between the comparable interim periods. \*\*\* reported the same raw material costs per board foot between the comparable interim periods. \*\*\* reported inputs from related suppliers which are at fair market value.<sup>11</sup> Table VI-6 presents a break-out of the raw material costs, by type, for fiscal year 2019.

**Table VI-6**  
**WMMP: U.S. producers' raw materials, by type, 2019**

	Fiscal year 2019	
	Value (1,000 dollars)	Share of value (percent)
Wood inputs:		
Pine	***	***
Fir	***	***
Other softwood	***	***
Hardwood	***	***
Other	***	***
All wood inputs	***	***
Adhesives	***	***
Primer/coating materials	***	***
Other material inputs	***	***
Total, raw materials	***	***

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

<sup>10</sup> Derived from U.S. producers' questionnaire responses of \*\*\*, question V-6.

<sup>11</sup> \*\*\*. U.S. producers' questionnaire responses of \*\*\*, question III-7a.



With respect to U.S. producers as shown in table VI-1, direct labor costs were the second largest component of COGS, ranging from \*\*\* percent (in 2018) to \*\*\* percent (in January-June 2019) of total COGS, while other factory costs (“OFC”) ranged from \*\*\* percent (in 2017) to \*\*\* percent (in 2019 and January-June 2020) of total COGS. The average direct labor costs per board foot increased from \$\*\*\* in 2017 to \$\*\*\* in 2019, and were lower in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*). The average OFC per board foot increased from \$\*\*\* in 2017 to \$\*\*\* in 2019, and were lower in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*).

For finishers, OFC were the second largest component of COGS, ranging from \*\*\* percent (in January-June 2019) to \*\*\* percent (in 2017) of total COGS, while direct labor costs ranged from \*\*\* percent (in 2017) to \*\*\* percent (in January-June 2020) of total COGS.<sup>12</sup> As shown in table VI-5, the average OFC per board foot declined irregularly from \$\*\*\* in 2017 to \$\*\*\* in 2019, and were higher in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*). The average direct labor costs per board foot increased from \$\*\*\* in 2017 to \$\*\*\* in 2018 and 2019, and were higher in January-June 2020 (\$\*\*\*) compared to January-June 2019 (\$\*\*\*).<sup>13</sup>

By-products, consisting of the sale or consumption of residual wood chips, bark, shavings, sawdust, and other products produced during the course of producing WMMP represented \*\*\* percent to \*\*\* percent of total revenue (net sales value plus by-product revenue) during the reporting period.

With respect to U.S. producers as shown in table VI-1, gross profits irregularly declined from 2017 to 2019 because the decline in revenue was greater than the decline in COGS, and also declined irregularly as a ratio to net sales. Gross profit was higher when comparing January-June 2020 to January-June 2019 due to the greater increase in revenue than in COGS between the periods. Gross profit margin (gross profit divided by total net sales) was higher in January-June 2020 than in January-June 2019.

With respect to finishers as shown in table VI-5, gross profits irregularly increased from 2017 to 2019 because the increase in total net sales value was greater than the increase in COGS, but declined irregularly as a ratio to net sales because COGS increased at a greater rate from 2017 to 2019 compared to the increase in net sales value in the same period. Gross profit

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<sup>12</sup> Derived from U.S. producers’ questionnaire responses of \*\*\*, question V-6.

<sup>13</sup> Estimated value added (total conversion costs (direct labor and other factory costs) as a share of total COGS) for U.S. producers ranged from a low of \*\*\* percent in 2017 to a high of \*\*\* percent in January-June 2019 (based on data in table VI-1). Estimated value added for finishers ranged from a low of \*\*\* percent in January-June 2019 to a high of \*\*\* percent in January-June 2020 (derived from U.S. producers’ questionnaire responses of \*\*\*, question V-6).

was higher in January-June 2020 than in January-June 2019 due to the greater decline in COGS than in revenue. Gross profit margin was also higher in January-June 2020 than in January-June 2019.

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

With respect to U.S. producers as shown in table VI-1, total SG&A expenses declined while the SG&A expense ratio (total SG&A expenses divided by total net sales) increased from 2017 to 2019. Total SG&A expenses were higher in January-June 2020 than in January-June 2019, although the SG&A expense ratio remained unchanged between the comparable interim periods. With respect to finishers as shown in table VI-5, total SG&A expenses and the SG&A expense ratio increased from 2017 to 2019, but were lower in January-June 2020 than in January-June 2019.<sup>14</sup>

With respect to U.S. producers as shown in table VI-1, operating income declined from an operating profit in 2017 to an operating loss in 2018, but improved to a smaller operating loss in 2019. Operating income was higher (an operating profit) in January-June 2020 than in January-June 2019 (an operating loss). Operating income margin (operating income divided by total net sales) exhibited the same trend. With respect to finishers as shown in table VI-5, operating income and operating income margin declined from 2017 to 2019, but operating income and the operating income margin were higher in January-June 2020 compared to January-June 2019.

### **Other expenses and net income or loss**

Classified below the operating income level are interest expense, other expense, and other income. In table VI-1, these items are aggregated and only the net amount is shown. The net "all other expenses" for U.S. producers increased from 2017 to 2019 and was lower in January-June 2020 compared to January-June 2019.

By definition, items classified at this level in the income statement only affect net income or loss. With respect to U.S. producers as shown in table VI-1, net income declined from a net income in 2017 to a net loss in 2018, but improved to a smaller net loss in 2019. Net income was higher (a net profit) in January-June 2020 than in January-June 2019 (a net loss). Net income margin (net income divided by total net sales) exhibited the same trend. With

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<sup>14</sup> \*\*\*. Email from \*\*\*, November 19, 2020.

respect to finishers as shown in table VI-5, net income and net income margin declined from 2017 to 2019, but net income and the net income margin were higher in January-June 2020 compared to January-June 2019.

## **Variance analysis**

The variance analysis presented in tables VI-7 and VI-8 are based on the data in table VI-5.<sup>15</sup> With respect to U.S. producers, the analysis shows that operating income in 2017 worsened to an operating loss in 2019 because \*\*\*. Between the comparable interim periods, the operating income in January-June 2020 compared to the operating loss in January-June 2019 is primarily attributable to \*\*\* (see table VI-7).

With respect to finishers, the analysis shows that operating income declined from 2017 to 2019 because \*\*\*. Between the comparable interim periods, the higher operating income in January-June 2020 is primarily attributable to \*\*\* (see table VI-8).

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<sup>15</sup> The Commission's variance analysis is calculated in three parts: sales variance, cost of sales variance (COGS variance), and SG&A expense variance. Each part consists of a price variance (in the case of the sales variance) or a cost variance (in the case of the COGS and SG&A expense variance), and a volume variance. The sales or cost variance is calculated as the change in unit price or unit cost/expense times the new volume, while the volume variance is calculated as the change in volume times the old unit price or unit cost. Summarized at the bottom of the table, the price variance is from sales; the cost/expense variance is the sum of those items from COGS and SG&A expense variances, respectively, and the volume variance is the sum of the volume components of the net sales, COGS, and SG&A expense variances.

**Table VI-7**

**WMMP: Variance analysis for U.S. producers, between fiscal years and between partial year periods**

Item	Between fiscal years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	<b>Value (1,000 dollars)</b>			
Net sales:				
Price variance	***	***	***	***
Volume variance	***	***	***	***
Net sales variance	***	***	***	***
COGS:				
Cost variance	***	***	***	***
Volume variance	***	***	***	***
COGS variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A expenses:				
Cost/expense variance	***	***	***	***
Volume variance	***	***	***	***
Total SG&A expense variance	***	***	***	***
Operating income variance	***	***	***	***
Summarized (at the operating income level) as:				
Price variance	***	***	***	***
Net cost/expense variance	***	***	***	***
Net volume variance	***	***	***	***

Note.--Unfavorable variances are shown in parenthesis; all others are favorable.

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

**Table VI-8**

**WMMP: Variance analysis for U.S. finishers, between fiscal years and between partial year periods**

Item	Between fiscal years			Between partial year period
	2017-19	2017-18	2018-19	2019-20
	Value (1,000 dollars)			
Net sales:				
Price variance	***	***	***	***
Volume variance	***	***	***	***
Net sales variance	***	***	***	***
COGS:				
Cost variance	***	***	***	***
Volume variance	***	***	***	***
COGS variance	***	***	***	***
Gross profit variance	***	***	***	***
SG&A expenses:				
Cost/expense variance	***	***	***	***
Volume variance	***	***	***	***
Total SG&A expense variance	***	***	***	***
Operating income variance	***	***	***	***
Summarized (at the operating income level) as:				
Price variance	***	***	***	***
Net cost/expense variance	***	***	***	***
Net volume variance	***	***	***	***

Note.--Unfavorable variances are shown in parenthesis; all others are favorable.

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

## **Capital expenditures, research and development expenses, assets, and return on assets**

Table VI-9 presents capital expenditures, research and development (“R&D”) expenses, total assets, and the operating return on assets (operating income divided by total assets) related to the WMMP operations for U.S. producers and finishers. Table VI-10 presents corresponding narrative descriptions for U.S. producers and table VI-11 presents corresponding narrative descriptions for finishers.

**Table VI-9**

**WMMP: U.S. producers' and finishers' capital expenditures, R&D expenses, net assets and return on assets, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June			
	2017	2018	2019	2019	2020		
	Capital expenditures (1,000 dollars)						
U.S. producers	***	***	***	***	***		
U.S. finishers	***	***	***	***	***		
All firms	***	***	***	***	***		
	R&D expenses (1,000 dollars)						
U.S. producers	***	***	***	***	***		
U.S. finishers	***	***	***	***	***		
All firms	***	***	***	***	***		
	Total net assets (1,000 dollars)						
U.S. producers	***	***	***				
U.S. finishers	***	***	***				
All firms	***	***	***				
	Operating return on assets (percent)						
U.S. producers	***	***	***				
U.S. finishers	***	***	***				
All firms	***	***	***				

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

**Table VI-10**

**WMMP: U.S. producers' nature and focus of capital expenditures, R&D expenses and net assets , since January 1, 2017**

Item / Firm	Narrative
<b>Capital expenditures:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table VI-10—Continued**

**WMMP: U.S. producers' nature and focus of capital expenditures, research and development expenses and net assets , since January 1, 2017**

Item / Firm	Narrative
<b>Capital expenditures:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>Research and Development:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table VI-10—Continued**

**WMMP: U.S. producers' nature and focus of capital expenditures, research and development expenses and net assets , since January 1, 2017**

Item / Firm	Narrative
<b>Research and Development:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
<b>Assets:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.



**Table VI-10—Continued**

**WMMP: U.S. producers' nature and focus of capital expenditures, research and development expenses and net assets , since January 1, 2017**

Item / Firm	Narrative
<b>Assets:</b>	
***	***
***	***
***	***
***	***

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

**Table VI-11**

**WMMP: U.S. finishers' nature and focus of capital expenditures, research and development expenses and net assets , since January 1, 2017**

Item / Firm	Narrative
<b>Capital expenditures:</b>	
Cascade	***
Endura	***
Novo	***
Sunset	***
<b>Research and Development:</b>	
Cascade	***
Endura	***
Novo	***
Sunset	***
<b>Assets:</b>	
Cascade	***
Endura	***
Novo	***
Sunset	***

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

## Capital and investment

The Commission requested U.S. producers and finishers of WMMP to describe any actual or potential negative effects of imports of WMMP from Brazil and China on their firms' growth, investment, ability to raise capital, development and production efforts, or the scale of capital investments.<sup>16</sup> Table VI-12 presents the number of U.S. producers reporting an impact in each category and table VI-13 provides the U.S. producers' narrative responses. Table VI-14 presents the number of finishers reporting an impact in each category and table VI-15 provides the finishers' narrative responses.

**Table VI-12**

**WMMP: U.S. producers' actual and anticipated negative effects of imports on investment and growth and development**

Item	No	Yes
Negative effects on investment	4	11
Cancellation, postponement, or rejection of expansion projects		6
Denial or rejection of investment proposal		1
Reduction in the size of capital investments		9
Return on specific investments negatively impacted		7
Other		2
Negative effects on growth and development	5	10
Rejection of bank loans		5
Lowering of credit rating		2
Problem related to the issue of stocks or bonds		0
Ability to service debt		3
Other		6
Anticipated negative effects of imports	5	10

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

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<sup>16</sup> The Department of Commerce made a final negative determination resulting in termination of the investigation regarding Brazil on January 4, 2021. 86 FR 70. \*\*\* firm stated that their responses differ by country.

**Table VI-13**

**WMMP: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2017**

<b>Item / Firm</b>	<b>Narrative</b>
<b>Cancellation, postponement, or rejection of expansion projects:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
<b>Reduction in the size of capital investments:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table VI-13—Continued**

**WMMP: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2017**

<b>Return on specific investments negatively impacted:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
<b>Other negative effects on investments:</b>	
***	***
***	***
<b>Rejection of bank loans:</b>	
***	***
***	***
***	***
***	***
***	***
<b>Lowering of credit rating:</b>	
***	***
***	***

Table continued on next page.

**Table VI-13—Continued**

**WMMP: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2017**

<b>Ability to service debt:</b>	
***	***
***	***
***	***
<b>Other effects on growth and development:</b>	
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table VI-13—Continued**

**WMMP: U.S. producers' narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2017**

<b>Anticipated effects of imports:</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

**Table VI-14**

**WMMP: U.S. finishers' actual and anticipated negative effects of imports on investment and growth and development**

Item	No	Yes
Negative effects on investment	1	4
Cancellation, postponement, or rejection of expansion projects		3
Denial or rejection of investment proposal		0
Reduction in the size of capital investments		3
Return on specific investments negatively impacted		2
Other		2
Negative effects on growth and development		1
Rejection of bank loans		2
Lowering of credit rating		1
Problem related to the issue of stocks or bonds		0
Ability to service debt		1
Other		4
Anticipated negative effects of imports		1

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

**Table VI-15**

**WMMP: U.S. finishers' narratives relating to actual and anticipated negative effects of imports on investment and growth and development, since January 1, 2017**

Item / Firm	Narrative
<b>Return on specific investments negatively impacted:</b>	
***	***
<b>Other negative effects on investments:</b>	
***	***
<b>Other effects on growth and development:</b>	
***	***
<b>Anticipated effects of imports:</b>	
***	***

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



## Part VII: Threat considerations and information on nonsubject countries

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

*In determining whether an industry in the United States is threatened with material injury by reason of imports (or sales for importation) of the subject merchandise, the Commission shall consider, among other relevant economic factors<sup>1</sup>--*

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

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

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

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

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

## The industry in China

The Commission issued foreign producers' or exporters' questionnaires to 45 firms believed to produce and/or export WMMP from China.<sup>3</sup> Usable responses to the Commission's questionnaire were received from six firms (two producers and four resellers). These firms' exports accounted for less than \*\*\* percent of U.S. imports from China in 2019.<sup>4 5</sup> Table VII-1 presents information on the WMMP operations of the responding producers and exporters in China.

**Table VII-1**  
**WMMP: Summary data on firms in China, 2019**

<b>Firm</b>	<b>Production (1,000 board feet)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 board feet)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 board feet)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Evermark	***	***	***	***	***	***
Wenfeng	***	***	***	***	***	***
All firms	***	***	***	***	***	***

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

Table VII-2 shows summary data on resellers in China that exported to the United States in 2019. Of the responding Chinese firms, four of the six acted as resellers in 2019.

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

<sup>4</sup> This estimation was calculated by dividing total reported exports to the United States by total reported U.S. imports from China in 2019. See tables VII-3 and IV-2.

<sup>5</sup> During the preliminary phase of the investigations, usable responses to the Commission's questionnaire were received from 22 firms. These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of wood mouldings from China in 2018.

**Table VII-2**  
**WMMP: Summary data on resellers in China exporting to the United States, 2019**

Firm	Resales exported to the United States (1,000 board feet)	Share of resales exported to the United States (percent)
Goodwill	***	***
Jinxi	***	***
Nanping	***	***
Sanhe Dacheng	***	***
Total	***	***

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

### **Changes in operations**

Responding producers did not report any changes in operations since January 1, 2017.<sup>6</sup>

### **Operations on wood mouldings**

Table VII-3 presents information on the wood mouldings operations of the responding producers and exporters in China. Responding Chinese producers' WMMP capacity and production increased between 2017 and 2019 and are projected to increase in 2020 and 2021. The vast majority of responding Chinese producers' shipments were exported during 2017-19, primarily to the United States.<sup>7</sup>

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<sup>6</sup> During the preliminary phase of the investigations, two firms reported plant openings \*\*\*, one firm reported an expansion, and one firm reported an acquisition. \*\*\* reported an expansion and detailed that \*\*\*.

<sup>7</sup> During the preliminary phase of the investigations, in which there was greater participation from Chinese producers, responding firms reported similar trends of increasing capacity and production between 2016 and 2018 and that a great majority of their shipments were exported, primarily to the United States.

Table VII-3

WMMP: Data on industry in China, 2017-19, January-June 2019, and January-June 2020 and projected calendar years 2020 and 2021

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

Table continued on next page.

**Table VII-3--Continued**

**WMMP: Data on industry in China, 2017-19, January-June 2019, and January-June 2020 and projected calendar years 2020 and 2021**

Item	Actual experience					Projections	
	Calendar year			January to June		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	<b>Quantity (1,000 board feet)</b>						
Resales exported to the United States	***	***	***	***	***	***	***
Total exports to the U.S.	***	***	***	***	***	***	***
Adjusted total shipments	***	***	***	***	***	***	***
	<b>Ratios and shares (percent)</b>						
Share of total exports to the United States:							
Exported by producers	***	***	***	***	***	***	***
Exported by resellers	***	***	***	***	***	***	***
Adjusted share of total shipments exported to the United States	***	***	***	***	***	***	***

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**

Responding producers did not report production of alternative products on the same machinery used to produce WMMP.

### **Exports**

According to GTA, the leading export markets for WMMP from China are the United States, Japan, Korea, Canada, and the United Kingdom (table VII-4). During 2019, the United States was the top export market for WMMP from China by value, accounting for 36.2 percent, followed by Japan, accounting for 26.8 percent.

**Table VII-4**  
**WMMP: Exports from China by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
United States	100,958	101,844	52,077
Japan	49,295	36,785	38,473
Korea	11,141	13,550	16,826
United Kingdom	15,753	10,442	9,311
Canada	17,389	10,563	6,447
Australia	7,138	6,676	5,175
France	2,088	1,895	4,316
Hong Kong	1,375	1,382	1,623
India	1,012	795	911
All other destination markets	7,504	6,120	8,514
All destination markets	213,652	190,054	143,674
	<b>Share of value (percent)</b>		
United States	47.3	53.6	36.2
Japan	23.1	19.4	26.8
Korea	5.2	7.1	11.7
United Kingdom	7.4	5.5	6.5
Canada	8.1	5.6	4.5
Australia	3.3	3.5	3.6
France	1.0	1.0	3.0
Hong Kong	0.6	0.7	1.1
India	0.5	0.4	0.6
All other destination markets	3.5	3.2	5.9
All destination markets	100.0	100.0	100.0

Note.--United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Note.--GTA data for HS subheadings 4409.10, 4409.22, and 4409.29 include products that are outside the scope of these investigations. Consequently, the export data presented are overstated.

Source: Official exports statistics under HS subheading 4409.10, 4409.22, and 4409.29 as reported by China Customs in the Global Trade Atlas database, accessed October 29, 2020.

## **U.S. inventories of imported merchandise**

Table VII-5 presents data on U.S. importers' reported inventories of WMMP. End-of-period inventories from China increased by 17.3 percent between 2017 and 2019 and were 13.8 percent higher in interim 2020 than interim 2019. The ratio of importers' inventories from China to U.S. shipments of imports decreased slightly from 12.4 percent in 2017 to 11.8 percent in 2019 and was higher in interim 2020 (13.0 percent) than in interim 2019 (11.3 percent). Inventories from nonsubject sources increased by 15.5 percent between 2017 and 2019, when they were equivalent to 9.3 percent of U.S. shipments of imports, and were 29.9 percent lower in interim 2020 than in interim 2019.

Table VII-5

WMMP: U.S. importers' end-of-period inventories of imports by source, 2017-19, January-June 2019, and January-June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Inventories (1,000 board feet); Ratios (percent)</b>				
Imports from China:					
Inventories	25,261	31,753	29,621	27,039	30,770
Ratio to U.S. imports	13.0	12.3	11.9	11.7	12.3
Ratio to U.S. shipments of imports	12.4	12.6	11.8	11.3	13.0
Ratio to total shipments of imports	***	***	***	***	***
Imports from Brazil:					
Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from Chile:					
Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from all other sources:					
Inventories	***	***	***	***	***
Ratio to U.S. imports	***	***	***	***	***
Ratio to U.S. shipments of imports	***	***	***	***	***
Ratio to total shipments of imports	***	***	***	***	***
Imports from nonsubject sources:					
Inventories	47,130	51,624	54,435	61,815	43,321
Ratio to U.S. imports	8.8	9.4	9.2	10.6	7.9
Ratio to U.S. shipments of imports	8.7	9.5	9.3	11.0	7.5
Ratio to total shipments of imports	***	***	***	***	***
Imports from all import sources:					
Inventories	72,391	83,377	84,057	88,854	74,091
Ratio to U.S. imports	10.0	10.3	10.0	10.9	9.2
Ratio to U.S. shipments of imports	9.7	10.5	10.0	11.1	9.1
Ratio to total shipments of imports	***	***	***	***	***

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 WMMP from China, Brazil, Chile, and all other sources after June 30, 2020 (table VII-6). Of the responding importers, 39 of the 46 indicated that they had arranged such imports. Fifteen firms reported arranged imports from China, 21 firms from Brazil, 12 firms from Chile, and 23 firms from all other sources. Arranged imports from China accounted for \*\*\* percent of total arranged imports, while Brazil accounted for \*\*\* percent, Chile accounted for \*\*\* percent, and all other sources accounted for \*\*\* percent.

**Table VII-6**  
**WMMP: Arranged imports, July 2020 through June 2021**

Item	Period				
	Jul-Sep 2020	Oct-Dec 2020	Jan-Mar 2021	Apr-June 2021	Total
	<b>Quantity (1,000 board feet)</b>				
Arranged U.S. imports from.--					
China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	428,430

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

## Antidumping or countervailing duty orders in third-country markets

There are no known trade remedy actions on wood mouldings in third-country markets. Counsel for the petitioners stated that they are not aware of any antidumping or countervailing duty orders in place in any third-country market on wood mouldings imports from China.<sup>8</sup>

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<sup>8</sup> Petition, p. 4.

## Information on nonsubject countries

### Brazil<sup>9</sup>

Brazil is the largest source of WMMP imports into the United States, accounting for \*\*\* percent of U.S. imports by quantity in 2019.<sup>10</sup> The Commission issued foreign producers' or exporters' questionnaires to 25 firms believed to produce and/or export wood mouldings from Brazil.<sup>11</sup> Usable responses to the Commission's questionnaire were received from 12 firms.<sup>12</sup> These firms' exports to the United States accounted for approximately \*\*\* percent of U.S. imports of WMMP from Brazil by quantity in 2019.<sup>13</sup> The three largest producers (\*\*\*) accounted for \*\*\* percent of reported production in Brazil and \*\*\* percent of reported exports to the United States in 2019.

Table VII-7 presents information on the WMMP operations of the responding producers and exporters in Brazil.

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<sup>9</sup> Commerce determined that imports of WMMP from Brazil are not being sold at less than fair value.

<sup>10</sup> See table IV-2.

<sup>11</sup> These firms were identified through a review of information submitted in the petition and contained in \*\*\* records.

<sup>12</sup> Braspine and Braslumber submitted individual questionnaire responses in the preliminary phase of the investigations. During this current final phase, Braspine Madeiras Ltda / Braslumber Industria de Molduras Ltda ("Braspine") submitted one questionnaire response covering both establishments. In addition, \*\*\* certified that it was a producer of WMMP from Brazil, but later indicated that it was a plywood firm, not a moulding facility, and does not produce subject WMMP. Staff correspondence with \*\*\*, October 8, 2020 and November 25, 2020.

<sup>13</sup> This estimation was calculated by dividing total reported exports to the United States by total reported U.S. imports from Brazil in 2019. See tables VII-7 and IV-2.

**Table VII-7**  
**WMMP: Summary data on firms in Brazil, 2019**

<b>Firm</b>	<b>Production (1,000 board feet)</b>	<b>Share of reported production (percent)</b>	<b>Exports to the United States (1,000 board feet)</b>	<b>Share of reported exports to the United States (percent)</b>	<b>Total shipments (1,000 board feet)</b>	<b>Share of firm's total shipments exported to the United States (percent)</b>
Adami	***	***	***	***	***	***
Araupel	***	***	***	***	***	***
Braspine	***	***	***	***	***	***
Ipumirim	***	***	***	***	***	***
Lavrama	***	***	***	***	***	***
Linea	***	***	***	***	***	***
Randa	***	***	***	***	***	***
Rossini	***	***	***	***	***	***
Salvaro	***	***	***	***	***	***
Sincol	***	***	***	***	***	***
Solida	***	***	***	***	***	***
Sul	***	***	***	***	***	***
All firms	251,609	100.0	234,320	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.

### **Changes in operations**

As presented in table VII-8, producers in Brazil reported several operational and organizational changes since January 1, 2017. Three firms reported expansions and two firms reported investments to gain efficiencies in the production process.

**Table VII-8**

**WMMP: Reported changes in operations by producers in Brazil, since January 1, 2017**

Item / Firm	Reported changes in operations
<b>Relocations:</b>	
***	***
<b>Expansions:</b>	
***	***
***	***
***	***
<b>Other:</b>	
***	***
***	***

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

**Operations on wood mouldings**

Table VII-9 presents information on the wood mouldings operations of the responding producers and exporters in Brazil. Responding Brazilian producers’ wood mouldings capacity and production increased between 2017 and 2019, by 3.8 percent and 4.1 percent respectively and were higher in January-June 2020 than in January-June 2019, by 2.6 percent and 6.8 percent respectively. The capacity utilization of the responding Brazilian producers was relatively stable during the period at 87.2 percent in 2017 and 87.4 percent in 2018 and 2019. The responding Brazilian producers’ exports to the United States increased by 10.1 percent during 2017-19 and were 10.5 percent higher in January-June 2020 than in January-June 2019. Both capacity and production are projected to increase in 2021 as compared to 2019, by 6.2 percent and 17.7 percent respectively.

The Brazilian industry exported the vast majority (\*\*\*) percent) of its total shipments in 2019, primarily to the United States. Exports to the United States as a share of total shipments rose by \*\*\* percentage points between 2017 and 2019, from \*\*\* percent to \*\*\* percent, while exports to other markets fell by \*\*\* percentage points during the same period. Export shipments to the United States as a share of total shipments are projected to increase to \*\*\* percent in 2020 and 2021.

Table VII-9

WMMP: Data on industry in Brazil, 2017-19, January-June 2019, and January-June 2020 and projection calendar years 2020 and 2021

Item	Actual experience					Projections	
	Calendar year			January to June		Calendar year	
	2017	2018	2019	2019	2020	2020	2021
	<b>Quantity (1,000 board feet)</b>						
Capacity	277,194	275,885	287,804	145,160	148,960	298,372	305,668
Production	241,680	240,992	251,609	127,250	135,886	286,711	296,184
End-of-period inventories	4,201	4,317	4,035	6,900	5,287	2,652	2,641
Shipments:							
Home market shipments:							
Internal consumption/transfers	***	***	***	***	***	***	***
Commercial home market shipments	***	***	***	***	***	***	***
Total home market shipments	***	***	***	***	***	***	***
Export shipments to:							
United States	212,760	218,131	234,320	114,188	126,139	274,962	283,638
All other markets	***	***	***	***	***	***	***
Total exports	***	***	***	***	***	***	***
Total shipments	***	***	***	***	***	***	***
	<b>Ratios and shares (percent)</b>						
Capacity utilization	87.2	87.4	87.4	87.7	91.2	96.1	96.9
Inventories/production	1.7	1.8	1.6	2.7	1.9	0.9	0.9
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

Table VII-10 presents the overall capacity and production on the same equipment as in-scope production by Brazilian producers. Of the responding Brazilian producers, three of the 12 (\*\*\*) reported having produced other products on the same equipment and machinery used to produce WMMP. The vast majority of capacity is dedicated to the production of WMMP, which accounted for more than \*\*\* percent of production on the same machinery during 2017-19 and was higher in January-June 2020 (\*\*\*) percent) than in January-June 2019 (\*\*\*) percent). Other products produced on the same machinery included \*\*. One firm (\*\*\*) reported the ability to switch production of WMMP to out-of-scope products (\*\*).

**Table VII-10**

**WMMP: Overall capacity and production on the same equipment as in-scope production by producers in Brazil, 2017-19, January-June 2019, and January-June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Overall capacity	***	***	***	***	***
Production:					
Wood mouldings	***	***	***	***	***
Out-of-scope production:					
MDF	***	***	***	***	***
Other	***	***	***	***	***
All out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***
	<b>Ratios and shares (percent)</b>				
Overall capacity utilization	***	***	***	***	***
Production:					
Wood mouldings	***	***	***	***	***
Out-of-scope production:					
MDF	***	***	***	***	***
Other	***	***	***	***	***
All out-of-scope production	***	***	***	***	***
Total production on same machinery	***	***	***	***	***

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

## Exports

Table VII-11 presents exports of WMMP from Brazil. According to GTA, the leading export markets for WMMP from Brazil are the United States, France, Belgium, Denmark, and Canada. During 2019, the United States was the top export market for WMMP from Brazil by value, accounting for 64.1 percent of Brazilian exports, followed by France, accounting for 11.6 percent of exports.

**Table VII-11**  
**WMMP: Exports from Brazil by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
United States	342,444	339,499	355,391
France	35,903	43,030	64,628
Belgium	16,545	21,575	27,340
Denmark	10,805	12,926	13,200
Canada	12,589	12,187	11,936
Japan	8,483	7,507	11,740
Netherlands	6,102	7,167	10,265
Germany	5,464	7,442	8,711
Italy	3,727	4,713	6,537
All other destination markets	40,075	39,291	45,097
All destination markets	482,138	495,338	554,847
	<b>Share of value (percent)</b>		
United States	71.0	68.5	64.1
France	7.4	8.7	11.6
Belgium	3.4	4.4	4.9
Denmark	2.2	2.6	2.4
Canada	2.6	2.5	2.2
Japan	1.8	1.5	2.1
Netherlands	1.3	1.4	1.9
Germany	1.1	1.5	1.6
Italy	0.8	1.0	1.2
All other destination markets	8.3	7.9	8.1
All destination markets	100.0	100.0	100.0

Note.--United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Note.--GTA data for HS subheadings 4409.10, 4409.22, and 4409.29 include products that are outside the scope of these investigations. Consequently, the export data presented are overstated.

Source: Official exports statistics under HS subheading 4409.10, 4409.22, and 4409.29 as reported by SECEX – Foreign Trade Secretariat in the Global Trade Atlas database, accessed October 29, 2020.

## Chile

Chile is the third largest source of wood moulding imports into the United States, accounting for \*\*\* percent of U.S. imports by quantity in 2019, after Brazil and China, which accounted for approximately \*\*\* percent and \*\*\* percent of U.S. imports by quantity in 2019.<sup>14</sup>

According to GTA, the value of Chile's global exports of all wood mouldings decreased by 1.3 percent from 2017 to 2019. The United States was Chile's largest destination market in the last three years, based on value; Chile's exports to the United States accounted for 87.2 percent of the value of Chile's global exports in 2019, which was a 2.8 percentage point increase from 2017. Australia was Chile's second largest destination market, by value, which accounted for 7.9 percent of the value of Chile's exports in 2019. Table VII-12 presents Chile's global export data for wood mouldings.

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<sup>14</sup> See table IV-2.



**Table VII-12****WMMP: Exports from Chile by destination market, 2017-19**

Destination market	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
United States	205,436	211,324	209,426
Australia	24,297	26,386	18,988
Canada	4,602	4,526	3,912
Mexico	5,287	7,167	3,436
New Zealand	517	1,143	1,525
Netherlands	645	465	640
Colombia	527	229	557
Japan	391	376	533
Costa Rica	698	971	439
All other destinations	887	792	692
All destination markets	243,287	253,378	240,147
	<b>Share of value (percent)</b>		
United States	84.4	83.4	87.2
Australia	10.0	10.4	7.9
Canada	1.9	1.8	1.6
Mexico	2.2	2.8	1.4
New Zealand	0.2	0.5	0.6
Netherlands	0.3	0.2	0.3
Colombia	0.2	0.1	0.2
Japan	0.2	0.1	0.2
Costa Rica	0.3	0.4	0.2
All other destinations	0.4	0.3	0.3
All destination markets	100.0	100.0	100.0

Note.--United States is shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Note.--GTA data for HS subheadings 4409.10, 4409.22, and 4409.29 include products that are outside the scope of these investigations. Consequently, the export data presented are overstated.

Source: Official exports statistics under HS subheading 4409.10, 4409.22, and 4409.29 as reported by Chile Customs - Servicio Nacional de Aduana in the Global Trade Atlas database, accessed October 29, 2020.

## Global exports

Table VII-13 presents global wood mouldings exports. The value of global exports of all wood mouldings decreased by 1.2 percent from 2017 to 2019. Indonesia, a nonsubject country, was the largest global exporter based on value in 2019 and accounted for 13.5 percent of global exports in that year. Brazil was the second largest global exporter, by value, accounting for 12.2 percent of global exports in 2019. Poland, the United States, and Germany, ranked third, fourth, and fifth, respectively; combined, these three countries accounted for approximately 18.6 percent of global exports in 2019.

**Table VII-13**  
**WMMP: Global exports by exporter, 2017-19**

Exporter	Calendar year		
	2017	2018	2019
	<b>Value (1,000 dollars)</b>		
United States	279,628	293,488	289,226
China	213,652	190,054	143,674
Brazil	482,138	495,338	554,847
Indonesia	682,496	705,768	610,930
Poland	270,486	297,460	305,515
Germany	233,717	260,924	250,059
Chile	243,287	253,378	240,147
Malaysia	197,178	216,836	210,623
Estonia	147,430	167,476	176,834
Italy	145,207	162,903	159,714
Austria	130,483	151,062	147,162
Canada	171,174	138,877	138,142
Russia	71,109	98,137	108,240
All other exporters	1,324,729	1,398,050	1,204,256
All exporters	4,592,715	4,829,750	4,539,367
	<b>Share of value (percent)</b>		
United States	6.1	6.1	6.4
China	4.7	3.9	3.2
Brazil	10.5	10.3	12.2
Indonesia	14.9	14.6	13.5
Poland	5.9	6.2	6.7
Germany	5.1	5.4	5.5
Chile	5.3	5.2	5.3
Malaysia	4.3	4.5	4.6
Estonia	3.2	3.5	3.9
Italy	3.2	3.4	3.5
Austria	2.8	3.1	3.2
Canada	3.7	2.9	3.0
Russia	1.5	2.0	2.4
All other exporters	28.8	28.9	26.5
All exporters	100.0	100.0	100.0

Note.--United States, Brazil, and China are shown at the top, all remaining top export destinations shown in descending order of 2019 data.

Note.--GTA data for HS subheadings 4409.10, 4409.22, and 4409.29 include products that are outside the scope of these investigations. Consequently, the export data presented are overstated.

Source: Official exports statistics under HS subheading 4409.10, 4409.22, and 4409.29 reported by various national statistical authorities in the Global Trade Atlas database, accessed October 29, 2020.

**APPENDIX A**

***FEDERAL REGISTER NOTICES***



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://www.usitc.gov). In addition, the following tabulation presents, in chronological order, *Federal Register* notices issued by the Commission and Commerce during the current proceeding.

<b>Citation</b>	<b>Title</b>	<b>Link</b>
85 FR 2438, January 15, 2020	<i>Wood Mouldings and Millwork Products From Brazil and China; Institution of Anti-Dumping and Countervailing Duty Investigations and Scheduling of Preliminary Phase Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-01-15/pdf/2020-00465.pdf">https://www.govinfo.gov/content/pkg/FR-2020-01-15/pdf/2020-00465.pdf</a>
85 FR 6502, February 5 2020	<i>Wood Mouldings and Millwork Products From Brazil and the People's Republic of China: Initiation of Less-Than-Fair-Value Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-02-05/pdf/2020-02155.pdf">https://www.govinfo.gov/content/pkg/FR-2020-02-05/pdf/2020-02155.pdf</a>
85 FR 6513, February 5 2020	<i>Wood Mouldings and Millwork Products From the People's Republic of China: Initiation of Countervailing Duty Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-02-05/pdf/2020-02153.pdf">https://www.govinfo.gov/content/pkg/FR-2020-02-05/pdf/2020-02153.pdf</a>
85 FR11391, February 27, 2020	<i>Wood Mouldings and Millwork Products from Brazil and China</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-02-27/pdf/2020-04010.pdf">https://www.govinfo.gov/content/pkg/FR-2020-02-27/pdf/2020-04010.pdf</a>
85 FR 35900, June 12, 2020	<i>Wood Mouldings and Millwork Products From the People's Republic of China: Preliminary Affirmative Countervailing Duty Determination and Alignment of Final Determination With Final Antidumping Duty Determination</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-06-12/pdf/2020-12752.pdf">https://www.govinfo.gov/content/pkg/FR-2020-06-12/pdf/2020-12752.pdf</a>
85 FR 48667, August 12, 2020	<i>Wood Mouldings and Millwork Products From Brazil: Preliminary Negative Determination of Sales at Less Than Fair Value and Postponement of Final Determination</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-08-12/pdf/2020-17638.pdf">https://www.govinfo.gov/content/pkg/FR-2020-08-12/pdf/2020-17638.pdf</a>
85 FR 48669, August 12, 2020	<i>Wood Mouldings and Millwork Products From the People's Republic of China: Preliminary Affirmative Determination of Sales at Less Than Fair Value, Postponement of Final Determination, and Extension of Provisional Measures</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-08-12/pdf/2020-17637.pdf">https://www.govinfo.gov/content/pkg/FR-2020-08-12/pdf/2020-17637.pdf</a>
85 FR 54593, September 2, 2020	<i>Wood Mouldings and Millwork Products From Brazil and China; Scheduling of the Final Phase of Countervailing Duty and Antidumping Duty Investigations</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2020-09-02/pdf/2020-19368.pdf">https://www.govinfo.gov/content/pkg/FR-2020-09-02/pdf/2020-19368.pdf</a>
86 FR 63, January 4, 2021	<i>Wood Mouldings and Millwork Products From the People's Republic of China: Final Affirmative Determination of Sales at Less Than Fair Value</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29104.pdf">https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29104.pdf</a>
86 FR 67, January 4, 2021	<i>Wood Mouldings and Millwork Products From the People's Republic of China: Final Affirmative Countervailing Duty Determination</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29105.pdf">https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29105.pdf</a>
86 FR 70, January 4, 2021	<i>Wood Mouldings and Millwork Products From Brazil: Final Negative Determination of Sales at Less Than Fair Value</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29103.pdf">https://www.govinfo.gov/content/pkg/FR-2021-01-04/pdf/2020-29103.pdf</a>
86 FR 1522, January 8, 2021	<i>Wood Mouldings and Millwork Products From Brazil; Termination of Investigation</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2021-01-08/pdf/2021-00140.pdf">https://www.govinfo.gov/content/pkg/FR-2021-01-08/pdf/2021-00140.pdf</a>



**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:** Wood Mouldings and Millwork Products from Brazil and China

**Inv. Nos.:** 701-TA-636 and 731-TA-1469-1470 (Final)

**Date and Time:** December 22, 2020 - 9:30 a.m.

### **OPENING REMARKS:**

Petitioners (**Laura El-Sabaawi**, Wiley Rein LLP)  
Respondents (**Eric C. Emerson**, Steptoe & Johnson LLP)

### **In Support of the Imposition of Antidumping and Countervailing Duty Orders:**

Wiley Rein LLP  
Washington, DC  
on behalf of

Coalition of American Millwork Producers

**Gary Moore**, President, Cascade Wood Products, Inc.

**Gary Trapp**, Executive Vice President and Chief Financial Officer,  
Cascade Wood Products, Inc.

**Greg Easton**, Vice President, Millwork Division,  
Woodgrain Millwork Inc.

**Bruce Procton**, President, Endura Products, Inc.

**Kevin MacDonald**, Vice President, Operations, Endura Products, Inc.

**Bill Carroll**, Millwork Division Manager, Sierra Pacific Industries

**Jon Gartman**, Secretary, Sierra Pacific Industries

**In Support of the Imposition of  
Antidumping and Countervailing Duty Orders (continued):**

**Dr. Seth T. Kaplan**, President, International Economic Research LLC

**Timothy C. Brightbill** )  
 ) – OF COUNSEL  
**Laura El-Sabaawi** )

**In Opposition to the Imposition of  
Antidumping and Countervailing Duty Orders:**

Steptoe & Johnson LLP  
Washington, DC  
on behalf of

Associacao Brasileira da Industria de Madeira Processada Mecanicamente  
("ABIMCI")

**Antonio Tadeu Giacomet**, Chairman of the Board,  
BrasPine Madeiras Ltda. and Braslumber Indústria  
de Molduras Ltda.

**Giovani Tadeu Simoes Pires Giacomet**, Finance Director,  
BrasPine Madeiras Ltda. and Braslumber Indústria  
de Molduras Ltda.

**Patrick Burke**, Director of Pine Procurement, Metrie Inc.

**Louis Donavon Ammons**, Managing Trader, Shamrock  
Building Materials, Inc.

**James P. Dougan**, Vice President, Economic Consulting Services, LLC

**Cara Groden**, Senior Economist, Economic Consulting Services, LLC

**Eric C. Emerson** )  
 ) – OF COUNSEL  
**Marcia Pulcherio** )

**In Opposition to the Imposition of  
Antidumping and Countervailing Duty Orders (continued):**

Nelson Mullins Riley & Scarborough LLP  
Greenville, SC  
FisherBroyles, LLP  
Washington, DC  
on behalf of

JELD-WEN, Inc.

**Mark Dixon**, Chief Procurement Officer and Senior Vice President,  
Global Procurement, JELD-WEN, Inc.

**Kris Fischer**, Senior Director, NA Sourcing, JELD-WEN, Inc.

**James L. Rogers**                    )  
**Kelly Reid**                         ) – OF COUNSEL  
**Philip S. Gallas**                 )

**REBUTTAL/CLOSING REMARKS:**

Petitioners (**Timothy C. Brightbill**, Wiley Rein LLP)  
Respondents (**Eric C. Emerson**, Steptoe & Johnson LLP and **James L. Rogers**,  
Nelson Mullins Riley & Scarborough LLP)

**-END-**



**APPENDIX C**  
**SUMMARY DATA**

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## Coextensive: U.S. producers and U.S. finishers

**Table C-1a**

**WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	976,014	1,000,570	1,015,231	488,609	504,061	▲4.0	▲2.5	▲1.5	▲3.2
Producers' share (fn1).....	23.9	20.4	17.6	18.1	19.4	▼(6.3)	▼(3.5)	▼(2.8)	▲1.3
<b>Importers' share (fn1):</b>									
China.....	20.8	25.2	24.8	24.4	23.4	▲4.0	▲4.4	▼(0.4)	▼(1.0)
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	55.3	54.4	57.6	57.5	57.2	▲2.3	▼(0.9)	▲3.2	▼(0.3)
All import sources.....	76.1	79.6	82.4	81.9	80.6	▲6.3	▲3.5	▲2.8	▼(1.3)
<b>U.S. consumption value:</b>									
Amount.....	1,648,760	1,662,135	1,675,009	818,502	859,439	▲1.6	▲0.8	▲0.8	▲5.0
<b>Producers' share (fn1):</b>									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	31.1	28.2	25.6	26.0	26.9	▼(5.5)	▼(3.0)	▼(2.6)	▲0.8
<b>Importers' share (fn1):</b>									
China.....	19.7	24.1	24.3	23.8	23.5	▲4.6	▲4.5	▲0.2	▼(0.3)
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	49.2	47.7	50.1	50.1	49.6	▲0.9	▼(1.5)	▲2.4	▼(0.5)
All import sources.....	68.9	71.8	74.4	74.0	73.1	▲5.5	▲3.0	▲2.6	▼(0.8)
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	203,143	252,289	251,734	119,172	117,931	▲23.9	▲24.2	▼(0.2)	▼(1.0)
Value.....	324,493	401,298	407,114	195,082	201,840	▲25.5	▲23.7	▲1.4	▲3.5
Unit value.....	\$1.60	\$1.59	\$1.62	\$1.64	\$1.71	▲1.2	▼(0.4)	▲1.7	▲4.6
Ending inventory quantity.....	25,261	31,753	29,621	27,039	30,770	▲17.3	▲25.7	▼(6.7)	▲13.8
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>Nonsubject sources</b>									
Quantity.....	539,968	544,470	584,706	280,941	288,522	▲8.3	▲0.8	▲7.4	▲2.7
Value.....	811,064	792,646	839,104	410,208	426,488	▲3.5	▼(2.3)	▲5.9	▲4.0
Unit value.....	\$1.50	\$1.46	\$1.44	\$1.46	\$1.48	▼(4.5)	▼(3.1)	▼(1.4)	▲1.2
Ending inventory quantity.....	47,130	51,624	54,435	61,815	43,321	▲15.5	▲9.5	▲5.4	▼(29.9)
<b>All import sources:</b>									
Quantity.....	743,112	796,759	836,440	400,112	406,452	▲12.6	▲7.2	▲5.0	▲1.6
Value.....	1,135,557	1,193,944	1,246,218	605,290	628,328	▲9.7	▲5.1	▲4.4	▲3.8
Unit value.....	\$1.53	\$1.50	\$1.49	\$1.51	\$1.55	▼(2.5)	▼(1.9)	▼(0.6)	▲2.2
Ending inventory quantity.....	72,391	83,377	84,057	88,854	74,091	▲16.1	▲15.2	▲0.8	▼(16.6)

Table continued on next page.

Table C-1a--Continued

WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	324,312	318,712	307,557	154,423	155,755	▼(5.2)	▼(1.7)	▼(3.5)	▲0.9
Producers: Production quantity.....	232,681	204,257	180,970	91,041	96,941	▼(22.2)	▼(12.2)	▼(11.4)	▲6.5
Producers: Capacity utilization (fn1).....	71.7	64.1	58.8	59.0	62.2	▼(12.9)	▼(7.7)	▼(5.2)	▲3.3
Finishers: Average capacity quantity.....	34,939	38,109	41,305	20,977	20,761	▲18.2	▲9.1	▲8.4	▼(1.0)
Finishers: Production quantity.....	17,221	19,670	20,228	11,176	9,998	▲17.5	▲14.2	▲2.8	▼(10.5)
Finishers: Capacity utilization (fn1).....	49.3	51.6	49.0	53.3	48.2	▼(0.3)	▲2.3	▼(2.6)	▼(5.1)
U.S. shipments:									
Quantity (fn2).....	232,903	203,810	178,791	88,497	97,608	▼(23.2)	▼(12.5)	▼(12.3)	▲10.3
Value (fn2):									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	513,203	468,191	428,791	213,212	231,111	▼(16.4)	▼(8.8)	▼(8.4)	▲8.4
Unit value (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	1,227	928	713	321	273	▼(41.9)	▼(24.4)	▼(23.2)	▼(15.0)
Value.....	3,080	2,502	2,016	905	777	▼(34.6)	▼(18.8)	▼(19.4)	▼(14.1)
Unit value.....	\$2.51	\$2.70	\$2.83	\$2.82	\$2.85	▲12.7	▲7.4	▲4.9	▲1.1
Producers: Ending inventory quantity.....	10,653	10,212	11,701	12,444	10,780	▲9.8	▼(4.1)	▲14.6	▼(13.4)
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	2,737	2,589	2,452	2,491	2,422	▼(10.4)	▼(5.4)	▼(5.3)	▼(2.8)
Hours worked (1,000s).....	5,761	5,368	4,976	2,575	2,516	▼(13.6)	▼(6.8)	▼(7.3)	▼(2.3)
Wages paid (\$1,000).....	99,427	94,483	88,608	44,826	45,049	▼(10.9)	▼(5.0)	▼(6.2)	▲0.5
Hourly wages (dollars per hour).....	\$17.26	\$17.60	\$17.81	\$17.41	\$17.90	▲3.2	▲2.0	▲1.2	▲2.8
Producers: Productivity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn3.--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.



## Related party exclusion: U.S. producers and U.S. finishers

**Table C-1b**

**WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	976,014	1,000,570	1,015,231	488,609	504,061	▲4.0	▲2.5	▲1.5	▲3.2
Producers' share (fn1)									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers.....	23.9	20.4	17.6	18.1	19.4	▼(6.3)	▼(3.5)	▼(2.8)	▲1.3
Importers' share (fn1):									
China.....	20.8	25.2	24.8	24.4	23.4	▲4.0	▲4.4	▼(0.4)	▼(1.0)
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	55.3	54.4	57.6	57.5	57.2	▲2.3	▼(0.9)	▲3.2	▼(0.3)
All import sources.....	76.1	79.6	82.4	81.9	80.6	▲6.3	▲3.5	▲2.8	▼(1.3)
<b>U.S. consumption value:</b>									
Amount.....	1,648,760	1,662,135	1,675,009	818,502	859,439	▲1.6	▲0.8	▲0.8	▲5.0
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers.....	31.1	28.2	25.6	26.0	26.9	▼(5.5)	▼(3.0)	▼(2.6)	▲0.8
Importers' share (fn1):									
China.....	19.7	24.1	24.3	23.8	23.5	▲4.6	▲4.5	▲0.2	▼(0.3)
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	49.2	47.7	50.1	50.1	49.6	▲0.9	▼(1.5)	▲2.4	▼(0.5)
All import sources.....	68.9	71.8	74.4	74.0	73.1	▲5.5	▲3.0	▲2.6	▼(0.8)
<b>U.S. importers' U.S. shipments of imports from:</b>									
China:									
Quantity.....	203,143	252,289	251,734	119,172	117,931	▲23.9	▲24.2	▼(0.2)	▼(1.0)
Value.....	324,493	401,298	407,114	195,082	201,840	▲25.5	▲23.7	▲1.4	▲3.5
Unit value.....	\$1.60	\$1.59	\$1.62	\$1.64	\$1.71	▲1.2	▼(0.4)	▲1.7	▲4.6
Ending inventory quantity.....	25,261	31,753	29,621	27,039	30,770	▲17.3	▲25.7	▼(6.7)	▲13.8
Brazil:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Chile:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources:									
Quantity.....	539,968	544,470	584,706	280,941	288,522	▲8.3	▲0.8	▲7.4	▲2.7
Value.....	811,064	792,646	839,104	410,208	426,488	▲3.5	▼(2.3)	▲5.9	▲4.0
Unit value.....	\$1.50	\$1.46	\$1.44	\$1.46	\$1.48	▼(4.5)	▼(3.1)	▼(1.4)	▲1.2
Ending inventory quantity.....	47,130	51,624	54,435	61,815	43,321	▲15.5	▲9.5	▲5.4	▼(29.9)
All import sources:									
Quantity.....	743,112	796,759	836,440	400,112	406,452	▲12.6	▲7.2	▲5.0	▲1.6
Value.....	1,135,557	1,193,944	1,246,218	605,290	628,328	▲9.7	▲5.1	▲4.4	▲3.8
Unit value.....	\$1.53	\$1.50	\$1.49	\$1.51	\$1.55	▼(2.5)	▼(1.9)	▼(0.6)	▲2.2
Ending inventory quantity.....	72,391	83,377	84,057	88,854	74,091	▲16.1	▲15.2	▲0.8	▼(16.6)

Table continued on next page.

**Table C-1b--Continued**

**WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
Included U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn2).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▲***	▼***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn3).....	***	***	***	***	***	▼***	▲***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn3).....	***	***	***	***	***	▼***	▲***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn3.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values

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

## Coextensive: U.S. producers (no finishing operations)

Table C-2a

WMMP: Summary data concerning the U.S. market excluding finishers, 2017-19, January to June 2019, and January to June 2020

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	976,014	1,000,570	1,015,231	488,609	504,061	▲4.0	▲2.5	▲1.5	▲3.2
Producers' share (fn1).....	23.9	20.4	17.6	18.1	19.4	▼(6.3)	▼(3.5)	▼(2.8)	▲1.3
Importers' share (fn1):									
China.....	20.8	25.2	24.8	24.4	23.4	▲4.0	▲4.4	▼(0.4)	▼(1.0)
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....									
All import sources.....	55.3	54.4	57.6	57.5	57.2	▲2.3	▼(0.9)	▲3.2	▼(0.3)
All import sources.....	76.1	79.6	82.4	81.9	80.6	▲6.3	▲3.5	▲2.8	▼(1.3)
U.S. consumption value:									
Amount.....	1,618,703	1,628,919	1,640,893	802,502	842,072	▲1.4	▲0.6	▲0.7	▲4.9
Producers' share (fn1).....	29.8	26.7	24.1	24.6	25.4	▼(5.8)	▼(3.1)	▼(2.7)	▲0.8
Importers' share (fn1):									
China.....	20.0	24.6	24.8	24.3	24.0	▲4.8	▲4.6	▲0.2	▼(0.3)
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....									
All import sources.....	50.1	48.7	51.1	51.1	50.6	▲1.0	▼(1.4)	▲2.5	▼(0.5)
All import sources.....	70.2	73.3	75.9	75.4	74.6	▲5.8	▲3.1	▲2.7	▼(0.8)
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	203,143	252,289	251,734	119,172	117,931	▲23.9	▲24.2	▼(0.2)	▼(1.0)
Value.....	324,493	401,298	407,114	195,082	201,840	▲25.5	▲23.7	▲1.4	▲3.5
Unit value.....	\$1.60	\$1.59	\$1.62	\$1.64	\$1.71	▲1.2	▼(0.4)	▲1.7	▲4.6
Ending inventory quantity.....	25,261	31,753	29,621	27,039	30,770	▲17.3	▲25.7	▼(6.7)	▲13.8
Brazil:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Chile:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources:									
Quantity.....	539,968	544,470	584,706	280,941	288,522	▲8.3	▲0.8	▲7.4	▲2.7
Value.....	811,064	792,646	839,104	410,208	426,488	▲3.5	▼(2.3)	▲5.9	▲4.0
Unit value.....	\$1.50	\$1.46	\$1.44	\$1.46	\$1.48	▼(4.5)	▼(3.1)	▼(1.4)	▲1.2
Ending inventory quantity.....	47,130	51,624	54,435	61,815	43,321	▲15.5	▲9.5	▲5.4	▼(29.9)
All import sources:									
Quantity.....	743,112	796,759	836,440	400,112	406,452	▲12.6	▲7.2	▲5.0	▲1.6
Value.....	1,135,557	1,193,944	1,246,218	605,290	628,328	▲9.7	▲5.1	▲4.4	▲3.8
Unit value.....	\$1.53	\$1.50	\$1.49	\$1.51	\$1.55	▼(2.5)	▼(1.9)	▼(0.6)	▲2.2
Ending inventory quantity.....	72,391	83,377	84,057	88,854	74,091	▲16.1	▲15.2	▲0.8	▼(16.6)

Table continued on next page.

**Table C-2a--Continued**

**WMMP: Summary data concerning the U.S. market excluding finishers, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers:									
Average capacity quantity.....	324,312	318,712	307,557	154,423	155,755	▼(5.2)	▼(1.7)	▼(3.5)	▲0.9
Production quantity.....	232,681	204,257	180,970	91,041	96,941	▼(22.2)	▼(12.2)	▼(11.4)	▲6.5
Capacity utilization (fn1).....	71.7	64.1	58.8	59.0	62.2	▼(12.9)	▼(7.7)	▼(5.2)	▲3.3
U.S. shipments:									
Quantity.....	232,903	203,810	178,791	88,497	97,608	▼(23.2)	▼(12.5)	▼(12.3)	▲10.3
Value.....	483,146	434,975	394,676	197,212	213,744	▼(18.3)	▼(10.0)	▼(9.3)	▲8.4
Unit value.....	\$2.07	\$2.13	\$2.21	\$2.23	\$2.19	▲6.4	▲2.9	▲3.4	▼(1.7)
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	10,653	10,212	11,701	12,444	10,780	▲9.8	▼(4.1)	▲14.6	▼(13.4)
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	2,502	2,363	2,237	2,275	2,201	▼(10.6)	▼(5.6)	▼(5.3)	▼(3.3)
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▼***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "0.05" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "----". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

## Related party exclusion: U.S. producers (no finishing operations)

Table C-2b

WMMP: Summary data concerning the U.S. market excluding finishers and one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020  
 (Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. consumption quantity:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. consumption value:									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1):									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
U.S. importers' U.S. shipments of imports from:									
China:									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Chile:									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All other sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-2b--Continued

WMMP: Summary data concerning the U.S. market excluding finishers and one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020  
 (Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
Included U.S. producers':									
Average capacity quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
U.S. shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Productivity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▼***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

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

## Split like product: WMMP excluding LVL WMMP

Table C-3a

**WMMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>Nonsubject sources:</b>									
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Producers' share (fn1):</b>									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Nonsubject sources:</b>									
All import sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
<b>U.S. importers' U.S. imports from (fn2):</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>U.S. producers' and U.S. finishers':</b>									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
<b>U.S. shipments:</b>									
Quantity (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Value (fn3):</b>									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn3).....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

Table C-3a--Continued

WMMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers' and U.S. finishers'--Continued									
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--U.S. importers' U.S. imports, not U.S. importers' U.S. shipments of imports, were used for this table due to data availability.

fn3.-- The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL sold in the United States from U.S. producers using their own milled blanks plus the value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn4.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values

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



## Related party exclusion: WMMP excluding LVL WMMP

Table C-3b

**WMMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. importers' U.S. imports from (fn2):</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>U.S. producers' and U.S. finishers':</b>									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***

Table continued on next page.

**Table C-3b--Continued**

**WMMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers' and U.S. finishers'--Continued									
U.S. shipments:									
Quantity (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn3).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▼***	▲***
SG&A expenses.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--U.S. importers' U.S. imports, not U.S. importers' U.S. shipments of imports, were used for this table due to data availability.

fn3.-- The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL sold in the United States from U.S. producers using their own milled blanks plus the value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn4.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values

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

## Split like product: LVL WMMP

**Table C-4**

**LVL WMMP: Summary data concerning the U.S. market, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	***	***	***	▲***
Chile.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▼***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers' share (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Importers' share (fn1):									
China.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	***	***	***	▲***
Chile.....	***	***	***	***	***	***	***	***	***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Nonsubject sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
All import sources.....	***	***	***	***	***	▼***	▲***	▼***	▲***
<b>U.S. importers' U.S. imports from (fn3):</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	***	***	***	▲***
Value.....	***	***	***	***	***	***	***	***	▲***
Unit value.....	***	***	***	***	***	***	***	***	▲***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	***	***	***	***
Value.....	***	***	***	***	***	***	***	***	***
Unit value.....	***	***	***	***	***	***	***	***	***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. producers':</b>									
Average capacity quantity.....	***	***	***	***	***	***	***	***	***
Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Capacity utilization (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>U.S. shipments:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Export shipments:</b>									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Inventories/total shipments (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▲***

Table continued on next page.

**Table C-4--Continued**

**LVL WMMP: Summary data concerning the U.S. market, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers:--Continued									
Production workers.....	***	***	***	***	***	***	***	***	***
Hours worked (1,000s).....	***	***	***	***	***	***	***	***	***
Wages paid (\$1,000).....	***	***	***	***	***	***	***	***	***
Hourly wages (dollars per hour).....	***	***	***	***	***	***	***	***	***
Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Net sales:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Cost of goods sold (COGS).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Gross profit or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Research and development expenses.....	***	***	***	***	***	***	***	***	***
Net assets.....	***	***	***	***	***	▲***	▼***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit operating income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit net income or (loss) (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▲***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "0.05" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--Percent changes only calculated when both comparison values represent profits; The directional change in profitability provided when one or both comparison values represent a loss.

fn3.--U.S. importers' U.S. imports, not U.S. importers' U.S. shipments of imports, were used for this table due to data availability.

fn4.--Calculation not provided.

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

## Expanded like product: WMMP + MDF MMP

**Table C-5a**

**WMMP+MDF MMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020**  
 (Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	1,259,100	1,299,259	1,312,460	632,267	656,939	▲4.2	▲3.2	▲1.0	▲3.9
Producers' share (fn1).....	29.9	27.3	24.4	25.2	25.8	▼(5.5)	▼(2.6)	▼(2.9)	▲0.5
<b>Importers' share (fn1):</b>									
China.....	16.1	19.4	19.2	18.8	18.0	▲3.0	▲3.3	▼(0.2)	▼(0.9)
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	11.1	11.4	11.9	11.5	12.4	▲0.8	▲0.3	▲0.5	▲0.9
Nonsubject sources.....	54.0	53.3	56.4	55.9	56.3	▲2.5	▼(0.7)	▲3.2	▲0.4
All import sources.....	70.1	72.7	75.6	74.8	74.2	▲5.5	▲2.6	▲2.9	▼(0.5)
<b>U.S. consumption value:</b>									
Amount.....	1,998,156	2,033,657	2,036,600	993,902	1,044,741	▲1.9	▲1.8	▲0.1	▲5.1
<b>Producers' share (fn1):</b>									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	34.7	32.4	29.8	30.6	30.7	▼(4.9)	▼(2.3)	▼(2.6)	▲0.1
<b>Importers' share (fn1):</b>									
China.....	16.2	19.7	20.0	19.6	19.3	▲3.8	▲3.5	▲0.3	▼(0.3)
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	8.5	8.9	9.0	8.5	9.1	▲0.5	▲0.4	▲0.1	▲0.6
Nonsubject sources.....	49.1	47.8	50.2	49.8	50.0	▲1.1	▼(1.2)	▲2.4	▲0.2
All import sources.....	65.3	67.6	70.2	69.4	69.3	▲4.9	▲2.3	▲2.6	▼(0.1)
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	203,143	252,289	251,734	119,172	117,931	▲23.9	▲24.2	▼(0.2)	▼(1.0)
Value.....	324,493	401,298	407,114	195,082	201,840	▲25.5	▲23.7	▲1.4	▲3.5
Unit value.....	\$1.60	\$1.59	\$1.62	\$1.64	\$1.71	▲1.2	▼(0.4)	▲1.7	▲4.6
Ending inventory quantity.....	25,261	31,753	29,621	27,039	30,770	▲17.3	▲25.7	▼(6.7)	▲13.8
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>MDF all sources:</b>									
Quantity.....	139,770	147,820	156,149	72,558	81,263	▲11.7	▲5.8	▲5.6	▲12.0
Value.....	169,477	180,088	183,077	84,503	95,448	▲8.0	▲6.3	▲1.7	▲13.0
Unit value.....	\$1.21	\$1.22	\$1.17	\$1.16	\$1.17	▼(3.3)	▲0.5	▼(3.8)	▲0.9
Ending inventory quantity.....	19,325	18,730	28,178	22,041	24,653	▲45.8	▼(3.1)	▲50.4	▲11.8
<b>Nonsubject sources:</b>									
Quantity.....	679,738	692,290	740,855	353,498	369,784	▲9.0	▲1.8	▲7.0	▲4.6
Value.....	980,540	972,734	1,022,181	494,711	521,936	▲4.2	▼(0.8)	▲5.1	▲5.5
Unit value.....	\$1.44	\$1.41	\$1.38	\$1.40	\$1.41	▼(4.4)	▼(2.6)	▼(1.8)	▲0.9
Ending inventory quantity.....	66,455	70,353	82,613	83,856	67,974	▲24.3	▲5.9	▲17.4	▼(18.9)
<b>All import sources:</b>									
Quantity.....	882,882	944,580	992,589	472,670	487,715	▲12.4	▲7.0	▲5.1	▲3.2
Value.....	1,305,034	1,374,032	1,429,295	689,793	723,776	▲9.5	▲5.3	▲4.0	▲4.9
Unit value.....	\$1.48	\$1.45	\$1.44	\$1.46	\$1.48	▼(2.6)	▼(1.6)	▼(1.0)	▲1.7
Ending inventory quantity.....	91,716	102,106	112,235	110,895	98,744	▲22.4	▲11.3	▲9.9	▼(11.0)

Table continued on next page.

Table C-5a--Continued

WMMP+MDF MMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020  
(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		January to June			Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	516,339	529,485	512,021	259,468	251,126	▼(0.8)	▲2.5	▼(3.3)	▼(3.2)
Producers: Production quantity.....	376,671	356,998	325,175	166,604	168,561	▼(13.7)	▼(5.2)	▼(8.9)	▲1.2
Producers: Capacity utilization (fn1).....	73.0	67.4	63.5	64.2	67.1	▼(9.4)	▼(5.5)	▼(3.9)	▲2.9
Finishers: Average capacity quantity.....	34,939	38,109	41,305	20,977	20,761	▲18.2	▲9.1	▲8.4	▼(1.0)
Finishers: Production quantity.....	17,221	19,670	20,228	11,176	9,998	▲17.5	▲14.2	▲2.8	▼(10.5)
Finishers: Capacity utilization (fn1).....	49.3	51.6	49.0	53.3	48.2	▼(0.3)	▲2.3	▼(2.6)	▼(5.1)
U.S. shipments:									
Quantity (fn2).....	376,218	354,679	319,871	159,597	169,224	▼(15.0)	▼(5.7)	▼(9.8)	▲6.0
Value (fn2):									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	693,123	659,625	607,304	304,109	320,965	▼(12.4)	▼(4.8)	▼(7.9)	▲5.5
Unit value (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Export shipments:									
Quantity.....	1,528	967	713	321	315	▼(53.4)	▼(36.7)	▼(26.3)	▼(1.8)
Value.....	3,482	2,548	2,016	905	828	▼(42.1)	▼(26.8)	▼(20.9)	▼(8.4)
Unit value.....	\$2.28	\$2.64	\$2.83	\$2.82	\$2.63	▲24.1	▲15.6	▲7.3	▼(6.8)
Producers: Ending inventory quantity.....	17,906	19,298	23,912	25,993	22,953	▲33.5	▲7.8	▲23.9	▼(11.7)
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	3,142	2,969	2,799	2,826	2,774	▼(10.9)	▼(5.5)	▼(5.7)	▼(1.8)
Hours worked (1,000s).....	6,587	6,203	5,747	2,982	2,934	▼(12.8)	▼(5.8)	▼(7.4)	▼(1.6)
Wages paid (\$1,000).....	113,545	109,284	102,972	52,193	53,008	▼(9.3)	▼(3.8)	▼(5.8)	▲1.6
Hourly wages (dollars per hour).....	\$17.24	\$17.62	\$17.92	\$17.50	\$18.07	▲3.9	▲2.2	▲1.7	▲3.2
Producers: Productivity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP and MDF sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP and MDF sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn3.--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.

**Related party exclusion: WMMP + MDF MMP**

**Table C-5b**

**WMMP + MDF MMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent—exceptions noted)

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▲***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▲***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. importers' U.S. shipments of imports from:</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
Ending inventory quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>MDF all sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▼***	▲***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***

Table continued on next page.

**Table C-5b--Continued**

**WMMP + MDF MMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period changes=percent--exceptions noted)

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun 2019-20
	2017	2018		2019	2020	2017-19	2017-18	2018-19	
U.S. importers' U.S. shipments of imports from--Continued:									
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Included U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value (fn2).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn2).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn3).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP and MDF sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP and MDF sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn3.--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.



## WMMP + MDF MMP excluding LVL WMMP

**Table C-6a**

**WMMP + MDF MMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2019	2020	2017-19	2017-18	2018-19
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Producers' share (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▼***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Producers' share (fn1):</b>									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. importers' U.S. imports from (fn2):</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>MDF all sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>All import sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***

Table continued on next page.

**Table C-6a--Continued**  
**WMMP + MDF MMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period

	Reported data					Period changes			
	Calendar year			January to June		Comparison years			Jan-Jun
	2017	2018	2019	2019	2020	2017-19	2017-18	2018-19	2019-20
U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▲***	▼***	▼***
U.S. shipments:									
Quantity (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value (fn3):									
Fully domestic value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value added to imports.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Total.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn3).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeros, null values, and undefined calculations are suppressed and shown as "--". Period changes preceded by a "▲" represent an increase, while period changes preceded by a "▼" represent a decrease.

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--U.S. importers' U.S. imports, not U.S. importers' U.S. shipments of imports, were used for WMMP excluding LVL in this table due to data availability.

fn3.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL and MDF sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL and MDF sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn4.--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.

## Related party exclusion: WMMP + MDF MMP excluding LVL WMMP

Table C-6b

**WMMP + MDF MMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period

	Reported data					Period changes			
	Calendar year		2019	January to June		Comparison years			Jan-Jun
	2017	2018		2019	2020	2017-19	2017-18	2018-19	2019-20
<b>U.S. consumption quantity:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. consumption value:</b>									
Amount.....	***	***	***	***	***	▲***	▲***	▼***	▲***
<b>Producers' share (fn1):</b>									
Included producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Excluded producers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
All producers.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>Importers' share (fn1):</b>									
China.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Brazil.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Chile.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All other sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
MDF all sources.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Nonsubject sources.....	***	***	***	***	***	▲***	▼***	▲***	▼***
All import sources.....	***	***	***	***	***	▲***	▲***	▲***	▼***
<b>U.S. importers' U.S. imports from (fn2):</b>									
<b>China:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▼***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>Brazil:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▼***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▲***	▲***
<b>Chile:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▼***
<b>All other sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
<b>MDF all sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▲***	▼***	▲***
<b>Nonsubject sources:</b>									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Value.....	***	***	***	***	***	▲***	▼***	▲***	▼***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***

Table continued on next page.

**Table C-6b--Continued**

**WMMP + MDF MMP excluding LVL WMMP: Summary data concerning the U.S. market including producers and finishers, excluding one U.S. producer \*\*\*, 2017-19, January to June 2019, and January to June 2020**

(Quantity=1,000 board feet; Value=1,000 dollars; Unit values, unit labor costs, and unit expenses=dollars per board foot; Productivity (board feet per hour); Period

	Reported data					Period changes			
	2017	Calendar year 2018	2019	January to June 2019	2020	Comparison years			Jan-Jun 2019-20
U.S. importers' U.S. imports from--Continued (fn2):									
All import sources:									
Quantity.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Value.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Unit value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Included U.S. producers' and U.S. finishers':									
Producers: Average capacity quantity.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Producers: Production quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Producers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Finishers: Average capacity quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Production quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Capacity utilization (fn1).....	***	***	***	***	***	▼***	▼***	▼***	▼***
U.S. shipments:									
Quantity (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value (fn3).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value (fn3).....	***	***	***	***	***	▲***	▼***	▲***	▼***
Export shipments:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Producers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Ending inventory quantity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Inv./total shipments (fn1).....	***	***	***	***	***	▲***	▲***	▲***	▼***
Production workers.....	***	***	***	***	***	▼***	▼***	▼***	▼***
Hours worked (1,000s).....	***	***	***	***	***	▼***	▼***	▼***	▼***
Wages paid (\$1,000).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Hourly wages (dollars per hour).....	***	***	***	***	***	▲***	▲***	▲***	▲***
Producers: Productivity.....	***	***	***	***	***	▼***	▲***	▼***	▲***
Producers: Unit labor costs.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Finishers: Productivity.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Finishers: Unit labor costs.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Net sales:									
Quantity.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Value.....	***	***	***	***	***	▼***	▼***	▼***	▲***
Unit value.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Cost of goods sold (COGS).....	***	***	***	***	***	▼***	▼***	▼***	▲***
Gross profit or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▲***
Operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Capital expenditures.....	***	***	***	***	***	▼***	▲***	▼***	▼***
Research and development expenses.....	***	***	***	***	***	▲***	▲***	▼***	▼***
Net assets.....	***	***	***	***	***	▲***	▲***	▲***	***
Unit COGS.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit SG&A expenses.....	***	***	***	***	***	▲***	▲***	▲***	▼***
Unit operating income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Unit net income or (loss) (fn4).....	***	***	***	***	***	▼***	▼***	▲***	▲***
COGS/sales (fn1).....	***	***	***	***	***	▲***	▲***	▼***	▼***
Operating income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***
Net income or (loss)/sales (fn1).....	***	***	***	***	***	▼***	▼***	▲***	▲***

Note.--Shares and ratios shown as "0.0" percent represent non-zero values less than "0.05" percent (if positive) and greater than "(0.05)" percent (if negative). Zeroes, null

fn1.--Reported data are in percent and period changes are in percentage points.

fn2.--U.S. importers' U.S. imports, not U.S. importers' U.S. shipments of imports, were used for WMMP excluding LVL in this table due to data availability.

fn3.--The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL and MDF sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL and MDF sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank. The unit value of U.S. producers' U.S. shipments is based on fully domestic value.

fn4.--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.

**APPENDIX D**

**NONSUBJECT PRICE DATA FROM BRAZIL AND CHILE**



In total, 23 importers provided price data from nonsubject countries Brazil and/or Chile. Twenty-one importers reported price data from Brazil, and six importers reported price data for Chile for products 1-6.<sup>1</sup> <sup>2</sup> Like U.S. producers, no importer provided usable price data for product 7 from Brazil or Chile.<sup>3</sup> Pricing data reported by these firms accounted for approximately 10.2 percent of the value of U.S. commercial shipments of imports from Brazil in 2019, and 14.5 percent of the value of U.S. commercial shipments of imports from Chile in 2019.<sup>4</sup>

Price and quantity data for Brazil and Chile are shown in tables D-1 to D-6, along with domestic prices. Figures D-1 to D-6 show price and quantity data for Brazil and Chile along with domestic and subject import prices. These price items and accompanying data are comparable to those presented in tables and figures V-3 to V-8.

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<sup>1</sup> Eight importers reported price data for Brazilian firm Araupel S.A., seven importers reported price data for Brazilian firm BrasPine/Braslumber, and 17 importers reported price data for all other Brazilian firms.

<sup>2</sup> Some firms reported aberrant or inconsistent data. Where possible, these data have been revised and/or removed.

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

<sup>4</sup> Pricing data reported by these firms accounted for approximately \*\*\* percent of U.S. shipments of imports from Aurapel S.A., \*\*\* percent of U.S. shipments of imports from BrasPine/Braslumber, and \*\*\* percent of U.S. shipments of imports from all other Brazilian sources in 2019.

**Table D-1**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 1 and product 1**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per lineal foot)	Quantity (lineal feet)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 1: Finger-jointed lineal board, made of pine/ fir, with dimensions of 23/32" x 5- 1/2", S4S, primed or coated.

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



**Table D-2**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 2 and product 2**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per lineal foot)	Quantity (lineal feet)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 2: Finger-jointed lineal trim, made of pine/fir, nominal 11/16" x nominal 2-1/4", WM356 casing, primed or coated.

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

**Table D-3**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 3 and product 3**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per lineal foot)	Quantity (lineal feet)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)	Price (per lineal foot)	Quantity (lineal feet)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 3: Finger-jointed lineal trim, made of pine/fir, 11/16" x 11/16", WM-106, primed or coated.

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

**Table D-4**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 4 and product 4**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per unit)	Quantity (units)	Price (per unit)	Quantity (units)	Margin (percent)	Price (per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 4: Jamb: Exterior door frame, made of pine/fir, nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dadoes for threshold and head attachment, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Table D-5**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 5 and product 5**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per unit)	Quantity (units)	Price (per unit)	Quantity (units)	Margin (percent)	Price (per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 5: Jamb: Adjustable interior door frame (split jambs), made of pine/fir, consisting of two pieces, one called female and the other called male, nominally 1-1/16" thick x nominal 4-9/16" width x nominal 7' long and machined with end top dado for threshold and head attachment, primed or coated.

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

**Table D-6**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic product 6 and product 6**  
**imported from Brazil and Chile, by quarter, January 2017-June 2020**

Period	United States		Brazil			Chile		
	Price (per unit)	Quantity (units)	Price (per unit)	Quantity (units)	Margin (percent)	Price (per unit)	Quantity (units)	Margin (percent)
<b>2017:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2018:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2019:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***
Jul.-Sep.	***	***	***	***	***	***	***	***
Oct.-Dec.	***	***	***	***	***	***	***	***
<b>2020:</b>								
Jan.-Mar.	***	***	***	***	***	***	***	***
Apr.-Jun.	***	***	***	***	***	***	***	***

Note: Product 6: Brick moulding: Casing, made of pine/fir, that attaches to exterior edge of door frame, nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Figure D-1**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 1, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 1: Finger-jointed lineal board, made of pine/ fir, with dimensions of 23/32" x 5- 1/2", S4S, primed or coated.

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

**Figure D-2**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 2, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 2: Finger-jointed lineal trim, made of pine/fir, nominal 11/16" x nominal 2-1/4", WM356 casing, primed or coated.

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

**Figure D-3**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 3, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 3: Finger-jointed lineal trim, made of pine/fir, 11/16" x 11/16", WM-106, primed or coated.

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



**Figure D-4**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 4, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 4: Jamb: Exterior door frame, made of pine/fir, nominally 1-1/4" thick with a nominal 1/2" rabbeted drop for door stop x nominal 4-9/16" width x nominal 7' long and machined with end dadoes for threshold and head attachment, primed or coated, without a composite or otherwise rot-proof bottom.

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

**Figure D-5**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 5, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 5: Jamb: Adjustable interior door frame (split jambs), made of pine/fir, consisting of two pieces, one called female and the other called male, nominally 1-1/16" thick x nominal 4-9/16" width x nominal 7' long and machined with end top dado for threshold and head attachment, primed or coated.

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

**Figure D-6**  
**WMMP: Weighted-average f.o.b. prices and quantities of domestic and imported product 6, by quarter, January 2017-June 2020**

\* \* \* \* \*

Note: Product 6: Brick moulding: Casing, made of pine/fir, that attaches to exterior edge of door frame, nominally 1-1/4" thick x 2" wide and 7' long with moulded profile on face, primed or coated, without a composite or otherwise rot-proof bottom.

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

Tables D-7a and D-7b compare pricing data from Brazil and Chile with price data from U.S. producers and subject imports from China. As shown in the tables, prices for product imported from Brazil were lower than prices for U.S.-produced product in 64 instances (\*\* lineal feet and \*\* units) and higher in 20 instances (\*\* lineal feet and \*\* units). Prices for product imported from Chile were lower than prices for U.S.-produced product in 74 instances (\*\* lineal feet and \*\* units) and higher in 10 instances (\*\* units).

In comparing pricing data from Brazil and Chile with pricing data from China, prices for product imported from Brazil were lower than prices for product from China in 58 instances (\*\* lineal feet and \*\* units) and higher in 26 instances (\*\* lineal feet and \*\* units). Prices for product imported from Chile were lower than prices for product from China in 54 instances (\*\* lineal feet and \*\* units) and higher in 30 instances (\*\* lineal feet and \*\* units).

**Table D-7a**

**WMMP: Summary of higher/(lower) unit values for Brazil and Chile price data for products 1-3, by source, January 2017-June 2020**

Comparison	Total number of comparisons	Lower than the comparison source		Higher than the comparison source	
		Number of quarters	Quantity (lineal feet)	Number of quarters	Quantity (lineal feet)
<b>Nonsubject vs. United States:</b>					
Brazil vs. United States	42	32	***	10	***
Chile vs. United States	42	42	***	---	***
<b>Nonsubject vs. subject:</b>					
Brazil vs. China	42	38	***	4	***
Chile vs. China	42	32	***	10	***

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

**Table D-7b**

**WMMP: Summary of higher/(lower) unit values for Brazil and Chile price data for products 4-6, by source, January 2017-June 2020**

Comparison	Total number of comparisons	Lower than the comparison source		Higher than the comparison source	
		Number of quarters	Quantity (number of units)	Number of quarters	Quantity (number of units)
<b>Nonsubject vs. United States:</b>					
Brazil vs. United States	42	32	***	10	***
Chile vs. United States	42	32	***	10	***
<b>Nonsubject vs. subject:</b>					
Brazil vs. China	42	20	***	22	***
Chile vs. China	42	22	***	20	***

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



**APPENDIX E**

**U.S. SHIPMENTS BY MATERIAL AND PRODUCT TYPE**

Table E-1: WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material ..... E-3

Table E-2: WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type ..... E-9



**Table E-1**

**WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. producers' U.S. shipments.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. producers' U.S. shipments.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. producers' U.S. shipments.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

Table continued on next page.

Table E-1--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from China.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from China.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from China.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from China.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from China.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

Table continued on next page.

Table E-1--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from Brazil.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from Brazil.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from Brazil.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from Brazil.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from Brazil.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

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Table E-1--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
<b>Quantity (1,000 board feet)</b>					
U.S. importers' U.S. shipments from Chile.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
<b>Value (1,000 dollars)</b>					
U.S. importers' U.S. shipments from Chile.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
<b>Unit value (dollars per board foot)</b>					
U.S. importers' U.S. shipments from Chile.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
<b>Share of quantity (percent)</b>					
U.S. importers' U.S. shipments from Chile.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
<b>Share of value (percent)</b>					
U.S. importers' U.S. shipments from Chile.-- Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

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Table E-1--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

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Table E-1--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by material, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Pine	***	***	***	***	***
Fir	***	***	***	***	***
Other softwoods	***	***	***	***	***
Hardwoods	***	***	***	***	***
Other	***	***	***	***	***
All material types	***	***	***	***	***

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

**Table E-2**

**WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. producers' U.S. shipments.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
<b>Share of quantity (percent)</b>					
U.S. producers' U.S. shipments.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
<b>Share of value (percent)</b>					
U.S. producers' U.S. shipments.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from China.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from China.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from China.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from China.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from China.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from Brazil.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from Brazil.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from Brazil.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from Brazil.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from Brazil.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from Chile.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from Chile.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from Chile.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from Chile.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from Chile.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from all other sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. importers' U.S. shipments from all import sources.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. importers' U.S. shipments from all import sources.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. importers' U.S. shipments from all import sources.-- Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

Table continued on next page.

Table E-2--Continued

WMMP: U.S. producers' and U.S. importers' U.S. shipments, by product type, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. importers' U.S. shipments from all import sources.--					
Blanks	***	***	***	***	***
Door frames / jambs	***	***	***	***	***
Casings / trim / base	***	***	***	***	***
S1S2E	***	***	***	***	***
Crown / cove moulding	***	***	***	***	***
Base caps / corner	***	***	***	***	***
Corbels / plinths	***	***	***	***	***
Other	***	***	***	***	***
All product types	***	***	***	***	***

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

**APPENDIX F**

**WMMP VS. LVL WMMP  
DOMESTIC LIKE PRODUCTION INFORMATION**

U.S. producers' comparisons of in-scope WMMP and in-scope LVL WMMP .....	F-3
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WMMP excluding LVL WMMP: Trade and financial data .....	F-18
LVL WMMP only: Trade and financial data .....	F-30

**Table F-1**

**WMMP: U.S. producers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>U.S. producers: Interchangeability</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table F-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Manufacturing facilities, production processes, and production employees</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>U.S. producers: Channels of distribution</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table F-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Customer and producer perceptions</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>U.S. producers: Price</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

Table F-2

**WMMP: U.S. importers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
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***	***
***	***
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***	***
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***	***

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Table F-2--Continued

WMMP: U.S. importers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors

Item / Firm	Narrative
<b>U.S. importers: Interchangeability</b>	
***	***
***	***
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***	***
***	***
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***	***
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***	***
***	***
***	***

Table continued on next page.

**Table F-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Manufacturing facilities, production processes, and production employees</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-2--Continued

**WMMP: U.S. importers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Manufacturing facilities, production processes, and production employees (continued)</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>U.S. importers: Channels of distribution</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
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***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table F-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Customer and producer perceptions</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
***	***
***	***

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Table F-3

WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors

Item / Firm	Narrative
<b>U.S. purchasers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-3--Continued

WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors

Item / Firm	Narrative
<b>U.S. purchasers: Interchangeability</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

Table F-3--Continued

WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors

Item / Firm	Narrative
<b>U.S. purchasers: Manufacturing facilities, production processes, and production employees</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.



**Table F-3--Continued**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Channels of distribution</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table F-3--Continued**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Customer and producer perceptions</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table F-3--Continued**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and in-scope LVL WMMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Price</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

**Table F-4**

**WMMP excluding LVL WMMP: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
	<b>Ratio (percent)</b>				
Capacity utilization	***	***	***	***	***

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

**Figure F-1**

**WMMP excluding LVL WMMP: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**

\* \* \* \* \*

Table F-5

WMMP excluding LVL WMMP: U.S. producers' U.S. shipments, export shipments, and total shipments, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of value (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

**Table F-6****WMMP excluding LVL WMMP: U.S. producers' inventories, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' end-of-period inventories	***	***	***	***	***
	<b>Ratio (percent)</b>				
Ratio of inventories to-- U.S. production	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

**Table F-7****WMMP excluding LVL: U.S. producers' and U.S. finishers' employment related data, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Producers: Productivity (board feet per hour)	***	***	***	***	***
Producers: Unit labor costs (dollars per board foot)	***	***	***	***	***

Note.--Productivity and unit labors costs are presented for WMMP producers excluding LVL WMMP only.

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

**Table F-8**

**WMMP excluding LVL WMMP: U.S. producers' and importers' U.S. shipments, by sources and channels of distribution, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of U.S. shipments (percent)</b>				
U.S. producers: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: China: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Brazil: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Chile: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All other sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All import sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

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

Table F-9

WMMP excluding LVL WMMP: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.



Table F-9--Continued

WMMP excluding LVL WMMP: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Ratio to U.S. production</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

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

**Figure F-2**

**WMMP excluding LVL WMMP: U.S. import quantities and average unit values, 2017-19, January to June 2019, and January to June 2020**

\* \* \* \* \*

**Table F-10**

**WMMP excluding LVL WMMP: U.S. imports in the twelve month period preceding the filing of the petition, 2017-19, January to June 2019, and January to June 2020**

Item	January 2019 through December 2019	
	Quantity (1,000 board feet)	Share quantity (percent)
U.S. imports from.-- China	***	***
Brazil	***	***
All other sources	***	***
Nonsubject sources	***	***
All import sources	***	***

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

Table F-11

WMMP excluding LVL WMMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.--					
Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	***	***	***	***	***
U.S. imports from.--					
China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Note.--Breakout for Other WMMP vs. LVL for U.S. importers' U.S. shipments was unavailable for both quantity and value so quantities and values are presented on imports. The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

Table F-12

WMMP excluding LVL WMMP: U.S. producers', U.S. finishers', and U.S. importers' market shares, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Apparent U.S. consumption	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.--					
China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Apparent U.S. consumption	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. producers' U.S. shipments.--					
Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	***	***	***	***	***
U.S. imports from.--					
China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note.--Breakout for Other WMMP vs. LVL for U.S. importers' U.S. shipments was unavailable for both quantity and value so quantities and values are presented on imports. The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP excluding LVL sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP excluding LVL sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

**Figure F-3**

**WMMP excluding LVL WMMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January to June 2019, and January to June 2020**

\* \* \* \* \*

Table F-13

WMMP excluding LVL WMMP: Results of operations of U.S. producers and finishers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Cash flow	***	***	***	***	***
	<b>Ratio to net sales (percent)</b>				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

Table continued on next page.

**Table F-13--Continued**

**WMMP excluding LVL WMMP: Results of operations of U.S. producers and finishers, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Ratio to total COGS (percent)</b>				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	<b>Number of firms reporting</b>				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

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 F-14**

**WMMP excluding LVL WMMP: U.S. producers' and finishers' capital expenditures, research and development expenses, net assets and return on investment, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Value (1,000 dollars)</b>				
Capital expenditures	***	***	***	***	***
Research and development expenses	***	***	***	***	***
Net assets	***	***	***	***	***
	<b>Ratio percent</b>				
Operating return on assets	***	***	***	***	***

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

**Table F-15**

**LVL WMMP only: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Capacity	***	***	***	***	***
Production	***	***	***	***	***
	<b>Ratio (percent)</b>				
Capacity utilization	***	***	***	***	***

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

**Figure F-4**

**LVL WMMP only: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**

\*       \*       \*       \*       \*       \*       \*



Table F-16

LVL WMMP only: U.S. producers' U.S. shipments, export shipments, and total shipments, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of value (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

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

**Table F-17**

**LVL WMMP only: U.S. producers' inventories, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' end-of-period inventories	***	***	***	***	***
	<b>Ratio (percent)</b>				
Ratio of inventories to-- U.S. production	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

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

**Table F-18**

**LVL WMMP only: U.S. producers' employment related data, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	***	***	***	***	***
Total hours worked (1,000 hours)	***	***	***	***	***
Hours worked per PRW (hours)	***	***	***	***	***
Wages paid (\$1,000)	***	***	***	***	***
Hourly wages (dollars per hour)	***	***	***	***	***
Productivity (board feet per hour)	***	***	***	***	***
Unit labor costs (dollars per board foot)	***	***	***	***	***

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

**Table F-19**

**LVL WMMP only: U.S. producers' and importers' U.S. shipments, by sources and channels of distribution, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of U.S. shipments (percent)</b>				
U.S. producers: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: China: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Brazil: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: Chile: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All other sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
U.S. importers: All import sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

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

**Table F-20**

**LVL WMMP only: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Table continued on next page.

Table F-20--Continued

LVL WMMP only: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Ratio to U.S. production</b>				
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All others 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.

**Figure F-5**

**LVL WMMP only: U.S. import quantities and average unit values, 2017-19, January to June 2019, and January to June 2020**

\* \* \* \* \*

**Table F-21**

**LVL WMMP only: U.S. imports in the twelve month period preceding the filing of the petition, 2017-19, January to June 2019, and January to June 2020**

Item	January 2019 through December 2019	
	Quantity (1,000 board feet)	Share quantity (percent)
U.S. imports from.-- China	***	***
Brazil	***	***
All other sources	***	***
Nonsubject sources	***	***
All import sources	***	***

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

**Table F-22**

**LVL WMMP only: U.S. producers' and U.S. importers' apparent U.S. consumption, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
Apparent U.S. consumption	***	***	***	***	***

Note.--Breakout for Other WMMP vs. LVL for U.S. importers' U.S. shipments was unavailable for both quantity and value so quantities and values are presented on imports.

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

Table F-23

LVL WMMP only: U.S. producers' and U.S. importers' market shares, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Apparent U.S. consumption	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Apparent U.S. consumption	***	***	***	***	***
	<b>Share of value (percent)</b>				
U.S. producers' U.S. shipments	***	***	***	***	***
U.S. imports from.-- China	***	***	***	***	***
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
Nonsubject sources	***	***	***	***	***
All import sources	***	***	***	***	***

Note.--Breakout for Other WMMP vs. LVL for U.S. importers' U.S. shipments was unavailable for both quantity and value so quantities and values are presented on imports.

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



**Figure F-6**

**LVL WMMP only: U.S. producers' and U.S. importers' apparent U.S. consumption, 2017-19,  
January to June 2019, and January to June 2020**

\* \* \* \* \*

Table F-24

LVL WMMP only: Results of operations of U.S. producers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Cash flow	***	***	***	***	***
	<b>Ratio to net sales (percent)</b>				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

Table continued on next page.

**Table F-24--Continued**

**LVL WMMP only: Results of operations of U.S. producers, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Ratio to total COGS (percent)</b>				
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	<b>Number of firms reporting</b>				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

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 F-25**

**LVL WMMP only: U.S. producers' capital expenditures, research and development expenses, net assets and return on investment, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Value (1,000 dollars)</b>				
Capital expenditures	***	***	***	***	***
Research and development expenses	***	***	***	***	***
Net assets	***	***	***	***	***
	<b>Ratio percent</b>				
Operating return on assets	***	***	***	***	***

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



**APPENDIX G**

**WMMP VS. MDF MMP  
DOMESTIC LIKE PRODUCT INFORMATION**

U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP .....	G-3
U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP .....	G-8
U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP.....	G-15
WMMP including MDF MMP: Trade and financial data .....	G-18

**Table G-1**

**WMMP: U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

<b>Item / Firm</b>	<b>Narrative</b>
<b>U.S. producers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
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***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table G-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Interchangeability</b>	
***	***
***	***
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***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table G-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Manufacturing facilities, production processes, and production employees</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table G-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Channels of distribution</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
<b>U.S. producers: Customer and producer perceptions</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table G-1--Continued**

**WMMP: U.S. producers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. producers: Price</b>	
***	***
***	***
***	***
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***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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

**Table G-2**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

<b>Item / Firm</b>	<b>Narrative</b>
<b>U.S. importers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

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**Table G-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

<b>Item / Firm</b>	<b>Narrative</b>
<b>U.S. importers: Physical characteristics and uses (continued)</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.

**Table G-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Interchangeability</b>	
***	***
***	***
***	***
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***	***
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***	***
***	***
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***	***
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***	***
***	***
***	***

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**Table G-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Manufacturing facilities, production processes, and production employees</b>	
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***

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**Table G-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Channels of distribution</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
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***	***
***	***
***	***
***	***
***	***

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**Table G-2--Continued**

**WMMP: U.S. importers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. importers: Customer and producer perceptions</b>	
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
***	***
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***	***
***	***
***	***
***	***
***	***
***	***
***	***

Table continued on next page.



**Table G-3**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Physical characteristics and uses</b>	
***	***
***	***
***	***
***	***
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Table G-3--Continued

WMMP: U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors

Item / Firm	Narrative
<b>U.S. purchasers: Interchangeability</b>	
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**Table G-3--Continued**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Manufacturing facilities, production processes, and production employees</b>	
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Table G-3--Continued

WMMP: U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors

Item / Firm	Narrative
<b>U.S. purchasers: Channels of distribution</b>	
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**Table G-3--Continued**

**WMMP: U.S. purchasers' comparisons of in-scope WMMP and out-of-scope MDF MMP by the like product factors**

Item / Firm	Narrative
<b>U.S. purchasers: Customer and producer perceptions</b>	
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Table G-4

**WMMP+MDF MMP: U.S. producers, their position on the petition, location of production, and share of reported production, 2017-19, January to June 2019, and January to June 2020**

Firm	Position on petition	Production location(s)	Share of WMMP production (percent)	Share of MDF MMP production (percent)	Share of WMMP + MDF MMP production (percent)
Best Moulding	Petitioner	Albuquerque, NM	***	***	***
Bright Wood	Petitioner	Madras, Oregon	***	***	***
Cascade	Petitioner	White City, OR	***	***	***
ECMD	***	Wilkesboro, NC	***	***	***
Endura	Petitioner	Stokesdale, NC Nacogdoches, TX Sparta, TN	***	***	***
Jeld-Wen	***	Bend, OR Klamath Falls, OR	***	***	***
Menzner	Petitioner	Marathon, WI Wausau, WI Somerset, KY	***	***	***
Novo	***	Archdale, NC Bowerston, OH Ball Ground, GA Corona, CA High Point, NC Puyallup, WA	***	***	***
Pacific MDF	***	Rocklin, CA	***	***	***
Pacific Wood	Petitioner	Brookings, OR	***	***	***
Prime-Line	***	Malvern, AR	***	***	***
Masonite	***	Verdi, NV Stockton, CA	***	***	***
MJB	***	Cedar Hill, TX El Dorado, AR Clio, SC	***	***	***
Sierra Pacific	Petitioner	Red Bluff, CA Corning, CA	***	***	***
Smith Millwork	***	Lexington, NC	***	***	***
Sunset	Petitioner	Chico, CA Live Oak, CA	***	***	***
TLC	***	Willacoochee, GA	***	***	***
Woodgrain	Petitioner	Fruitland, ID Marion, VA Lenoir, NC Montevallo, AL	***	***	***
Yuba River	Petitioner	Olivehurst, CA	***	***	***
Total			***	***	***

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 G-5**

**WMMP+MDF MMP: U.S. MDF MMP producers' ownership, related and/or affiliated firms, 2017-19, January to June 2019, and January to June 2020**

Item / Firm	Firm Name	Affiliated/Ownership
<b>Ownership:</b>		
***	***	***
***	***	***
<b>Related importers/exporters:</b>		
***	***	***
<b>Related producers:</b>		
***	***	***

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

**Table G-6**

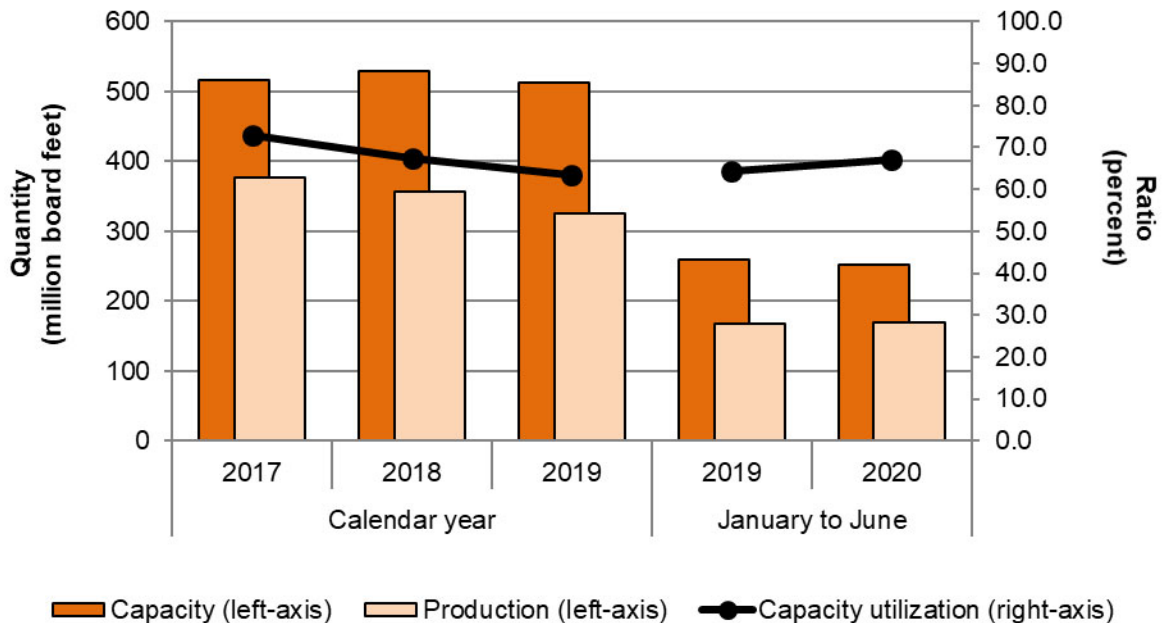
**WMMP+MDF MMP: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
<b>Quantity (1,000 board feet)</b>					
Capacity	516,339	529,485	512,021	259,468	251,126
Production	376,671	356,998	325,175	166,604	168,561
<b>Ratio (percent)</b>					
Capacity utilization	73.0	67.4	63.5	64.2	67.1

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

**Figure G-1**

**WMMP+MDF MMP: U.S. producers' capacity, production, and capacity utilization, 2017-19, January to June 2019, and January to June 2020**



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

Table G-7

WMMP+MDF MMP: U.S. producers' U.S. shipments, export shipments, and total shipments, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	376,218	354,679	319,871	159,597	169,224
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	663,065	626,409	573,189	288,109	303,598
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	1.76	1.77	1.79	1.81	1.79
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of quantity (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***
	<b>Share of value (percent)</b>				
Commercial U.S. shipments	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
U.S. shipments	***	***	***	***	***
Export shipments	***	***	***	***	***
Total shipments	***	***	***	***	***

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

**Table G-8****WMMP+MDF MMP: U.S. producers' inventories, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' end-of-period inventories	17,906	19,298	23,912	25,993	22,953
	<b>Ratio (percent)</b>				
Ratio of inventories to--					
U.S. production	4.8	5.4	7.4	7.8	6.8
U.S. shipments	4.8	5.4	7.5	8.1	6.8
Total shipments	***	***	***	***	***

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

**Table G-9****WMMP+MDF MMP: U.S. producers' and U.S. finishers' employment related data, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
Production and related workers (PRWs) (number)	3,142	2,969	2,799	2,826	2,774
Total hours worked (1,000 hours)	6,587	6,203	5,747	2,982	2,934
Hours worked per PRW (hours)	2,096	2,089	2,053	1,055	1,058
Wages paid (\$1,000)	113,545	109,284	102,972	52,193	53,008
Hourly wages (dollars per hour)	\$17.24	\$17.62	\$17.92	\$17.50	\$18.07
Producers: Productivity (board feet per hour)	***	***	***	***	***
Producers: Unit labor costs (dollars per board foot)	***	***	***	***	***

Note.--Productivity and unit labor costs are presented for WMMP and MDF MMP producers only.

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

Table G-10

**WMMP+MDF MMP: U.S. producers' and importers' U.S. shipments, by sources and channels of distribution, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of U.S. shipments (percent)</b>				
WMMP U.S. producers: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
WMMP U.S. importers: China: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
WMMP U.S. importers: Brazil: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
WMMP U.S. importers: Chile: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
WMMP U.S. importers: All other sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
MDF U.S. importers: all import sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***
WMMP U.S. importers: all import sources: to Distributors	***	***	***	***	***
to Retailers	***	***	***	***	***
to End users	***	***	***	***	***

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

Table G-11

WMMP+MDF MMP: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. imports from.-- China	193,581	257,459	249,855	116,015	125,577
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	138,250	147,225	165,597	75,869	82,529
Nonsubject sources	671,094	695,518	755,109	366,486	357,657
All import sources	864,674	952,978	1,004,964	482,502	483,234
	<b>Value (1,000 dollars)</b>				
U.S. imports from.-- China	270,364	361,105	352,176	168,498	184,506
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	159,206	169,853	173,194	82,535	88,197
Nonsubject sources	910,590	909,595	962,542	476,998	471,161
All import sources	1,180,954	1,270,700	1,314,718	645,496	655,666
	<b>Unit value (dollars per board foot)</b>				
U.S. imports from.-- China	1.40	1.40	1.41	1.45	1.47
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	1.15	1.15	1.05	1.09	1.07
Nonsubject sources	1.36	1.31	1.27	1.30	1.32
All import sources	1.37	1.33	1.31	1.34	1.36

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Table G-11--Continued

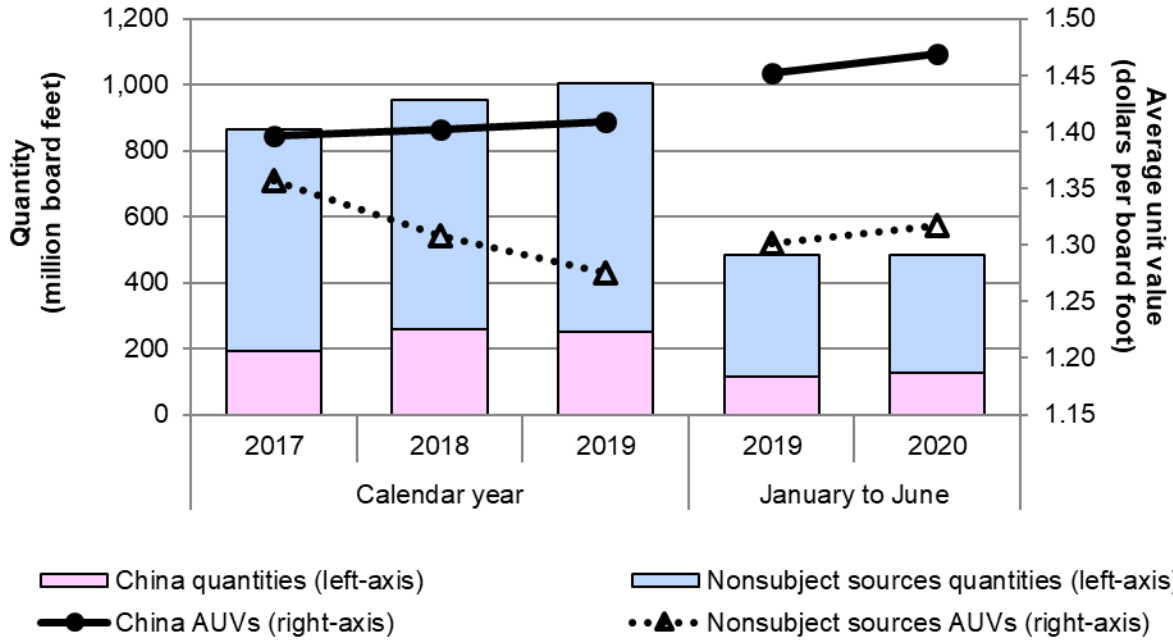
WMMP+MDF MMP: U.S. imports, by source, 2017-19, January to June 2019, and January to June 2020

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Share of quantity (percent)</b>				
U.S. imports from.-- China	22.4	27.0	24.9	24.0	26.0
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	16.0	15.4	16.5	15.7	17.1
Nonsubject sources	77.6	73.0	75.1	76.0	74.0
All import sources	100.0	100.0	100.0	100.0	100.0
	<b>Share of value (percent)</b>				
U.S. imports from.-- China	22.9	28.4	26.8	26.1	28.1
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	13.5	13.4	13.2	12.8	13.5
Nonsubject sources	77.1	71.6	73.2	73.9	71.9
All import sources	100.0	100.0	100.0	100.0	100.0
	<b>Ratio to U.S. production</b>				
U.S. imports from.-- China	51.4	72.1	76.8	69.6	74.5
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
All MDF imports	36.7	41.2	50.9	45.5	49.0
Nonsubject sources	178.2	194.8	232.2	220.0	212.2
All import sources	229.6	266.9	309.1	289.6	286.7

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

Figure G-2

WMMP+MDF MMP: U.S. import quantities and average unit values, 2017-19, January to June 2019, and January to June 2020



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



Table G-12

**WMMP+MDF MMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January to June 2019, and January to June 2020**

Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
U.S. producers' U.S. shipments	376,218	354,679	319,871	159,597	169,224
U.S. importers' U.S. shipments from.-- China	203,143	252,289	251,734	119,172	117,931
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
MDF U.S. shipments	139,770	147,820	156,149	72,558	81,263
Nonsubject sources	679,738	692,290	740,855	353,498	369,784
All import sources	882,882	944,580	992,589	472,670	487,715
Apparent U.S. consumption	1,259,100	1,299,259	1,312,460	632,267	656,939
	<b>Value (1,000 dollars)</b>				
U.S. producers' U.S. shipments.-- Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	693,123	659,625	607,304	304,109	320,965
U.S. importers' U.S. shipments from.-- China	324,493	401,298	407,114	195,082	201,840
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
MDF U.S. shipments	169,477	180,088	183,077	84,503	95,448
Nonsubject sources	980,540	972,734	1,022,181	494,711	521,936
All import sources	1,305,034	1,374,032	1,429,295	689,793	723,776
Apparent U.S. consumption	1,998,156	2,033,657	2,036,600	993,902	1,044,741

Note.-- The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP and MDF MMP sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP and MDF MMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

Table G-13

WMMP+MDF MMP: U.S. producers', U.S. finishers', and U.S. importers' market shares, 2017-19, January to June 2019, and January to June 2020

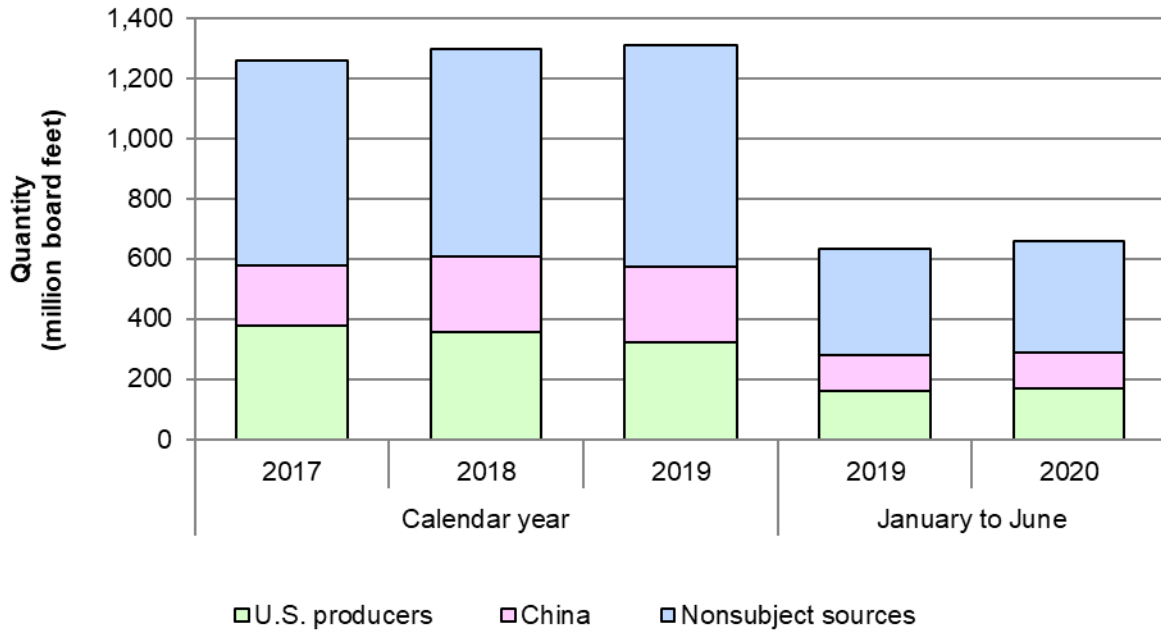
Item	Calendar year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Apparent U.S. consumption	1,259,100	1,299,259	1,312,460	632,267	656,939
	<b>Share of quantity (percent)</b>				
U.S. producers' U.S. shipments	29.9	27.3	24.4	25.2	25.8
U.S. importers' U.S. shipments from.--					
China	16.1	19.4	19.2	18.8	18.0
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
MDF U.S. shipments	11.1	11.4	11.9	11.5	12.4
Nonsubject sources	54.0	53.3	56.4	55.9	56.3
All import sources	70.1	72.7	75.6	74.8	74.2
	<b>Value (1,000 dollars)</b>				
Apparent U.S. consumption	1,998,156	2,033,657	2,036,600	993,902	1,044,741
	<b>Share of value (percent)</b>				
U.S. producers' U.S. shipments.--					
Fully domestic value	***	***	***	***	***
Value added to imports	***	***	***	***	***
Total	34.7	32.4	29.8	30.6	30.7
U.S. importers' U.S. shipments from.--					
China	16.2	19.7	20.0	19.6	19.3
Brazil	***	***	***	***	***
Chile	***	***	***	***	***
All other sources	***	***	***	***	***
MDF U.S. shipments	8.5	8.9	9.0	8.5	9.1
Nonsubject sources	49.1	47.8	50.2	49.8	50.0
All import sources	65.3	67.6	70.2	69.4	69.3

Note.-- The quantity for U.S. producers' U.S. shipments reflects the quantity of WMMP and MDF MMP sold in the United States from U.S. producers who use their own milled blanks; The value for U.S. producers' U.S. shipments reflects the value of WMMP and MDF MMP sold in the United States from U.S. producers using their own milled blanks plus the additional value added to WMMP by U.S. finishers. In measuring consumption and market share this methodology avoids reclassifying and/or double counting merchandise already reported once as an import or domestically produced blank.

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

Figure G-3

WMMP+MDF MMP: U.S. producers', U.S. finishers', and U.S. importers' apparent U.S. consumption, 2017-19, January to June 2019, and January to June 2020



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

Table G-14

WMMP+MDF MMP: Results of operations of U.S. producers and U.S. finishers, 2017-19, January to June 2019, and January to June 2020

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Quantity (1,000 board feet)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
	<b>Value (1,000 dollars)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Total COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Interest expense	***	***	***	***	***
All other expenses	***	***	***	***	***
All other income	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
Depreciation/amortization	***	***	***	***	***
Cash flow	***	***	***	***	***
	<b>Ratio to net sales (percent)</b>				
Cost of goods sold.--					
Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***

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**Table G-14--Continued**

**WMMP+MDF MMP: Results of operations of U.S. producers and U.S. finishers, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Ratio to total COGS (percent)</b>				
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
	<b>Unit value (dollars per board foot)</b>				
Commercial sales	***	***	***	***	***
Internal consumption	***	***	***	***	***
Transfers to related firms	***	***	***	***	***
Total net sales	***	***	***	***	***
Cost of goods sold.-- Raw materials	***	***	***	***	***
Direct labor	***	***	***	***	***
Other factory costs	***	***	***	***	***
Less: by-product revenue	***	***	***	***	***
Average COGS	***	***	***	***	***
Gross profit	***	***	***	***	***
SG&A expense	***	***	***	***	***
Operating income or (loss)	***	***	***	***	***
Net income or (loss)	***	***	***	***	***
	<b>Number of firms reporting</b>				
Operating losses	***	***	***	***	***
Net losses	***	***	***	***	***
Data	***	***	***	***	***

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 G-15**

**WMMP+MDF MMP: U.S. producers' capital expenditures, research and development expenses, net assets and return on investment, 2017-19, January to June 2019, and January to June 2020**

Item	Fiscal year			January to June	
	2017	2018	2019	2019	2020
	<b>Value (1,000 dollars)</b>				
Capital expenditures	***	***	***	***	***
Research and development expenses	***	***	***	***	***
Net assets	***	***	***	***	***
	<b>Ratio percent</b>				
Operating return on assets	***	***	***	***	***

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

