

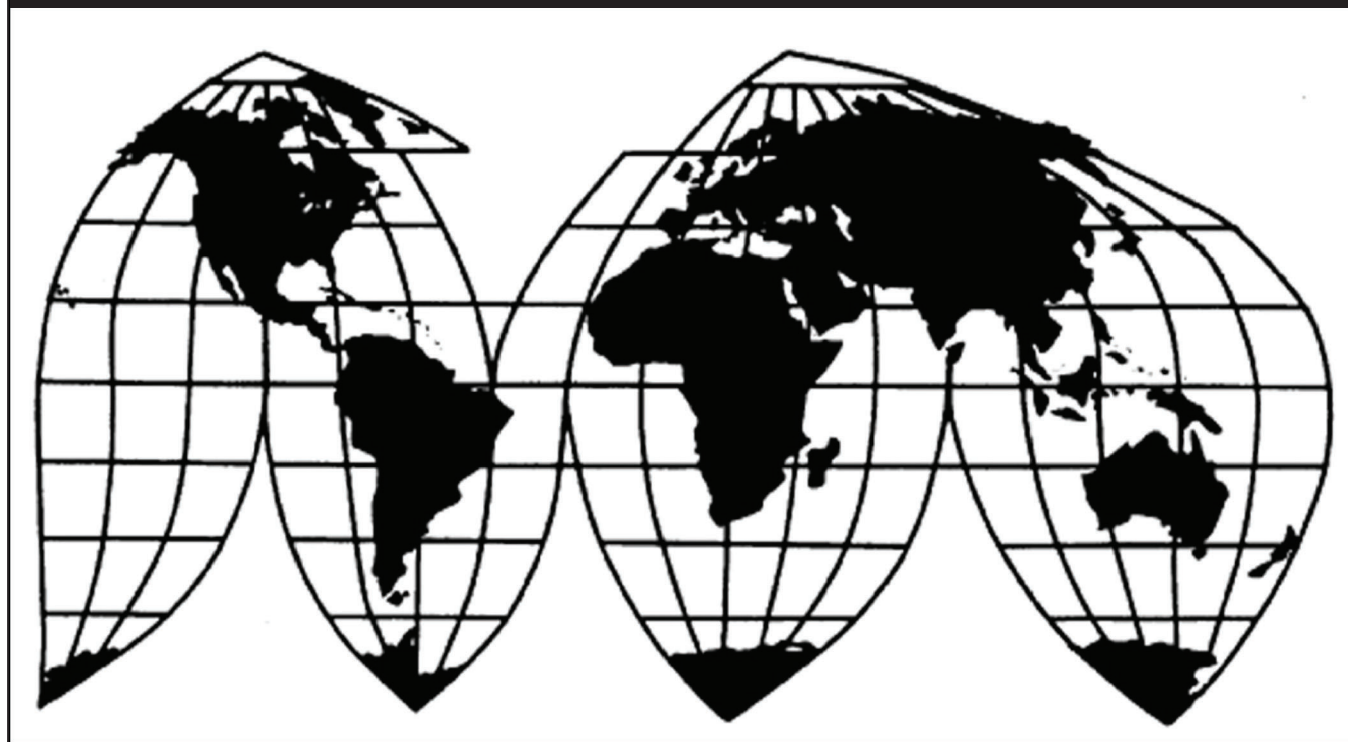
# **Stainless Steel Wire Rod from India**

Investigation No. 731-TA-638 (Fifth Review)

**Publication 5396**

**December 2022**

**U.S. International Trade Commission**



Washington, DC 20436

# U.S. International Trade Commission

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Note: Information that would reveal confidential operations of individual concerns may not be published. Such information is identified by brackets or by headings in confidential reports and is deleted and replaced with asterisks in public reports.

# UNITED STATES INTERNATIONAL TRADE COMMISSION

Investigation No. 731-TA-638 (Fifth Review)

Stainless Steel Wire Rod from India

## **DETERMINATION**

On the basis of the record<sup>1</sup> developed in the subject five-year review, the United States International Trade Commission (“Commission”) determines, pursuant to the Tariff Act of 1930 (“the Act”), that revocation of the antidumping duty order on stainless steel wire rod from India would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

## **BACKGROUND**

The Commission instituted this review on May 2, 2022 (87 FR 25671) and determined on August 5, 2022 that it would conduct an expedited review (87 FR 64246, October 24, 2022).

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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)).





## Views of the Commission

Based on the record in this five-year review, we determine under section 751(c) of the Tariff Act of 1930, as amended (“the Tariff Act”), that revocation of the antidumping duty order on stainless steel wire rod (“SSWR”) from India would be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

### I. Background

*Original Investigations.* On December 30, 1992, AL Tech Specialty Steel Corp., Armco Stainless & Alloy Products, Inc., Carpenter Technology Corporation (“Carpenter”), Republic Engineered Steels, Inc., Talley Metals Technology, Inc. (“Talley”), and the United Steelworkers of America, AFL-CIO/CLC, filed antidumping petitions concerning imports of SSWR from Brazil, France, and India.<sup>1</sup> In November 1993, the Commission determined that an industry in the United States was materially injured by reason of imports of SSWR from India that Commerce found to be sold at less than fair value.<sup>2</sup> Commerce issued an antidumping duty order on SSWR from India on December 1, 1993.<sup>3</sup>

*First Five-Year Reviews.* On July 1, 1999, the Commission instituted the first five-year reviews concerning the antidumping duty and countervailing duty orders on imports of SSWR from Brazil, France, India, and Spain.<sup>4</sup> The Commission conducted full reviews and determined that revocation of the antidumping duty orders covering SSWR from Brazil, France, and India

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<sup>1</sup> *Stainless Steel Wire Rod from India*, Inv. No 731-TA-638 (Final), USITC Pub. 2704 (Nov. 1993) at I-3 (“*Original Determination*”).

<sup>2</sup> *Original Determination*, USITC Pub. 2704 at I-3. Commerce postponed its final determinations regarding subject imports from Brazil and France. The Commission subsequently reached affirmative determinations regarding SSWR from Brazil and France in *Stainless Steel Wire Rod from Brazil and France*, Inv. Nos. 731-TA-636-637 (Final), USITC Pub. 2721 (Jan. 1994).

<sup>3</sup> *Antidumping Duty Order: Certain Stainless Steel Wire Rod from India*, 58 Fed. Reg. 63,335 (Dec. 1, 1993). The U.S. Court of International Trade (“CIT”) affirmed the Commission’s original determination concerning SSWR from India. See *Mukand Ltd. v. United States*, 937 F. Supp. 910 (Ct. Int’l Trade 1996).

<sup>4</sup> *Stainless Steel Wire Rod From Brazil, France, India, and Spain*, 64 Fed. Reg. 35,697 (July 1, 1999). Included in the Commission’s review was its prior determination that an industry in the United States was materially injured by reason of subsidized imports of SSWR from Spain. *Hot-Rolled Stainless Steel Bar, Cold-Formed Stainless Steel Bar, and Stainless Steel Wired Rod from Spain*, Inv. Nos. 701-TA-176-78 (Final), USITC Pub. 1333 (Dec. 1982).

would be likely to lead to continuation or recurrence of material injury.<sup>5</sup> It also found that revocation of the countervailing duty order on SSWR from Spain would not be likely to lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>6</sup> On August 2, 2000, Commerce published its notice of continuation of the antidumping duty orders covering SSWR from Brazil, France, and India.<sup>7</sup>

*Second Five-Year Reviews.* On July 1, 2005, the Commission instituted second five-year reviews of the antidumping duty orders on SSWR from Brazil, France, and India, and determined to conduct full reviews.<sup>8</sup> In July 2006, the Commission determined that revocation of the antidumping duty order on SSWR from India would be likely to lead to continuation or recurrence of material injury.<sup>9</sup> It also determined that revocation of the antidumping duty orders on SSWR from Brazil and France would not be likely to lead to continuation or recurrence of material injury.<sup>10</sup> On August 8, 2006, Commerce published its notice of continuation of the antidumping duty order covering SSWR from India.<sup>11</sup>

*Third Five-Year Review.* On July 1, 2011, the Commission instituted its third five-year review of the antidumping duty order on SSWR from India.<sup>12</sup> Following an expedited review, the Commission determined that revocation of the antidumping duty order on SSWR from India would be likely to lead to continuation or recurrence of material injury.<sup>13</sup> On January 23, 2012, Commerce published its notice of continuation of the antidumping duty order on SSWR from India.<sup>14</sup>

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<sup>5</sup> *Stainless Steel Wire Rod From Brazil, France, India, and Spain*, 64 Fed. Reg. 55,962 (Oct. 15, 1999); *Stainless Steel Wire Rod from Brazil, India, France, and Spain*, Inv. Nos. 701-TA-178 and 731-TA-636-638 (Review), USITC Pub. 3321 (July 2000) at 20, 24 (“*First Reviews*”).

<sup>6</sup> *First Reviews*, USITC Pub. 3321 at 3.

<sup>7</sup> Continuation of Antidumping Duty Orders: Stainless Steel Wire Rod from Brazil, France and India, 65 Fed. Reg. 47,403 (Aug. 2, 2000).

<sup>8</sup> *Stainless Steel Wire Rod from Brazil, France, and India*, 70 Fed. Reg. 38,207 (July 1, 2005); *Stainless Steel Wire Rod from Brazil, France, and India*, 70 Fed. Reg. 60,109 (Oct. 14, 2005).

<sup>9</sup> *Stainless Steel Wire Rod from Brazil, France, and India*, Inv. Nos. 731 TA 636-638 (Second Review), USITC Pub. 3866 (July 2006) at 3 (“*Second Reviews*”).

<sup>10</sup> *Second Reviews*, USITC Pub. 3866 at 3.

<sup>11</sup> Continuation of Antidumping Duty Orders on Stainless Steel Wire Rods from India, 71 Fed. Reg. 45,023 (Aug. 8, 2006).

<sup>12</sup> *Stainless Steel Wire Rod From India; Institution of a Five-Year Review Concerning the Antidumping Duty Order on Stainless Steel Wire Rod from India*, 76 Fed. Reg. 38,686 (July 1, 2011).

<sup>13</sup> *Stainless Steel Wire Rod From India; Scheduling of an Expedited Five-Year Review Concerning the Antidumping Duty Order on Stainless Steel Wire Rod from India*, 76 Fed. Reg. 64,105 (Oct. 17, 2011); *Stainless Steel Wire Rod from India*, Inv. 731-TA-638 (Third Review), USITC Pub. 4300 (“*Third Review*”) (Jan. 2012).

<sup>14</sup> *Certain Stainless Steel Wire Rods From India: Continuation of Antidumping Duty Order*, 77 Fed. Reg. 3231 (Jan. 23, 2012).

*Fourth Five-Year Review.* On December 1, 2016, the Commission instituted its fourth five-year review of the antidumping duty order on SSWR from India.<sup>15</sup> Following an expedited review, the Commission determined that revocation of the antidumping duty order on SSWR from India would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.<sup>16</sup> On June 23, 2017, Commerce published its notice of continuation of the antidumping duty order on SSWR from India.<sup>17</sup>

*Current Five-Year Review.* The Commission instituted this five-year review on May 2, 2022.<sup>18</sup> The Commission received a single joint response to its notice of institution from three U.S. producers of SSWR: Carpenter, North American Stainless, and Universal Stainless & Alloy Products, Inc. (collectively “Domestic Interested Parties”).<sup>19</sup> No respondent interested party responded to the notice of institution or participated in this review. On October 24, 2022, the Commission determined that the domestic interested party group response to its notice of institution was adequate and that the respondent interested party group response was inadequate.<sup>20</sup> Finding no other circumstances that would warrant conducting a full review, the Commission determined that it would conduct an expedited review of the order.<sup>21</sup> Domestic Interested Parties submitted final comments pursuant to Commission rule 207.62(d)(1) on November 21, 2022.<sup>22</sup>

U.S. industry data for this review are based on information provided by Domestic Interested Parties in their response to the notice of institution, accounting for an estimated \*\*\* percent of U.S. SSWR production in 2021.<sup>23</sup> U.S. import data are based on official Commerce

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<sup>15</sup> *Stainless Steel Wire Rod From India; Institution of a Five-Year Review*, 81 Fed. Reg. 86,728 (Dec. 1, 2016).

<sup>16</sup> *Stainless Steel Wire Rod From India; Scheduling of an Expedited Five-Year Review*, 82 Fed. Reg. 16,231 (April 3, 2017); *Stainless Steel Wire Rod from India, Inv. 731-TA-638 (Fourth Review)*, USITC Pub. 4695 (June 2017) (“Fourth Review”).

<sup>17</sup> *Certain Stainless Steel Wire Rods From India: Continuation of Antidumping Duty Order*, 82 Fed. Reg. 28,640 (June 23, 2017).

<sup>18</sup> *Stainless Steel Wire Rod From India; Institution of a Five-Year Review*, 87 Fed. Reg. 25,671 (May 2, 2022).

<sup>19</sup> *Domestic Interested Parties’ Response to Notice of Institution (June 1, 2022) (“Domestic Interested Parties’ Substantive Response”)*.

<sup>20</sup> *Stainless Steel Wire Rod From India; Scheduling of an Expedited Five-Year Review*, 87 Fed. Reg. 64,246, 64,247 (Oct. 2022).

<sup>21</sup> *Stainless Steel Wire Rod From India; Scheduling of an Expedited Five-Year Review*, 87 Fed. Reg. 64,246, 64,247 (Oct. 2022). Chairman Johanson voted to conduct a full review of the order. Commission Adequacy Vote (Aug. 2022) (EDIS Doc. No. 777252).

<sup>22</sup> *Domestic Interested Parties’ Final Comments*, November 21, 2022.

<sup>23</sup> Confidential Report, Memorandum INV-UU-076, July 26, 2022 (“CR”) at Table I-2; *Stainless Steel Wire Rod from India, Inv. Nos. 731-TA-638 (Fifth Review)*, USITC Pub. 5396 (Dec. 2022) (“PR”) at (Continued...)

statistics and data from the original investigations and prior five-year reviews.<sup>24</sup> Foreign industry data and related information are based on information supplied by Domestic Interested Parties in their response to the notice of institution, information from the original investigations and prior five-year reviews, and publicly available information gathered by the Commission.<sup>25</sup>

## II. Domestic Like Product and Industry

### A. Domestic Like Product

In making its determination under section 751(c) of the Tariff Act, the Commission defines the “domestic like product” and the “industry.”<sup>26</sup> 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 under this subtitle.”<sup>27</sup> The Commission’s practice in a five-year review is to examine the domestic like product definition from the original investigation and consider whether the record indicates any reason to revisit the prior findings.<sup>28</sup>

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(...Continued)

Table I-2; Domestic Interested Parties’ Substantive Response at 24, Exh. 5. Estimates of other U.S. production of SSWR were used to calculate U.S. participating producer’s share of the domestic industry due to the lack of overall production data. Domestic Interested Parties’ Substantive Response at 24, n.2.

<sup>24</sup> For 2021 U.S. imports, data was compiled from official Commerce statistics for HTS statistical reporting numbers 7221.00.0005, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075. CR/PR at I-19. Commerce revoked the antidumping duty order on SSWR manufactured by the Viraj Group in India and terminated suspension of liquidation for entries on or after December 1, 2003. *Id.* The import data may therefore be overstated as the aforementioned HTS statistical reporting numbers may contain imports from the Viraj Group that are excluded from the order as official import statistics do not distinguish between subject and nonsubject sources in India. For the years 1992-2015, data are compiled from the original investigations and subsequent five-year reviews. *Id.* at I-21.

<sup>25</sup> There were no purchaser responses to the Commission’s adequacy phase questionnaire. CR/PR at D-3.

<sup>26</sup> 19 U.S.C. § 1677(4)(A).

<sup>27</sup> 19 U.S.C. § 1677(10); *see, e.g., Cleo Inc. v. United States*, 501 F.3d 1291, 1299 (Fed. Cir. 2007); *NEC Corp. v. Dep’t of Commerce*, 36 F. Supp. 2d 380, 383 (Ct. Int’l Trade 1998); *Nippon Steel Corp. v. United States*, 19 CIT 450, 455 (1995); *Timken Co. v. United States*, 913 F. Supp. 580, 584 (Ct. Int’l Trade 1996); *Torrington Co. v. United States*, 747 F. Supp. 744, 748-49 (Ct. Int’l Trade 1990), *aff’d*, 938 F.2d 1278 (Fed. Cir. 1991); *see also* S. Rep. No. 249, 96<sup>th</sup> Cong., 1<sup>st</sup> Sess. 90-91 (1979).

<sup>28</sup> *See, e.g., Internal Combustion Industrial Forklift Trucks from Japan*, Inv. No. 731-TA-377 (Second Review), USITC Pub. 3831 at 8-9 (Dec. 2005); *Crawfish Tail Meat from China*, Inv. No. 731-TA-752 (Review), USITC Pub. 3614 at 4 (July 2003); *Steel Concrete Reinforcing Bar from Turkey*, Inv. No. 731-TA-745 (Review), USITC Pub. 3577 at 4 (Feb. 2003).

Commerce has defined the scope of the antidumping duty order in this five-year review as follows:

Certain stainless steel wire rods from India, which are hot-rolled or hot-rolled annealed and/or pickled rounds, squares, octagons, hexagons, or other shapes, in coils. Wire rod are made of alloy steels containing, by weight 1.2 percent or less of carbon and 10.5 percent of chromium, with or without other elements. These products are only manufactured by hot-rolling and are normally sold in coiled form, and are of solid cross-section. The majority of wire rod sold in the United States are round in cross-section shape, annealed, and pickled. The most common size is 5.5 millimeters in diameter.<sup>29</sup>

Commerce's scope has remained the same since the original investigations.

SSWR is an intermediate stainless steel product that is used primarily to produce stainless steel wire and stainless steel bar.<sup>30</sup> It is a long product produced in coiled form with no specific size limitation.<sup>31</sup> SSWR is produced at least as large as 39 mm (1.54 inch) in diameter circular cross-section, although the most common size is 5.5 mm (0.217 inch) in diameter.<sup>32</sup> This is the smallest size normally produced on a hot-rolling mill and is the size most commonly used for wire drawing.<sup>33</sup> The primary use for SSWR shipped in the domestic market is for the production of wire which is then used to produce downstream products such as industrial fasteners, springs, medical and dental instruments, automotive parts, and welding electrodes.<sup>34</sup>

In the original investigations, the Commission rejected arguments that it find separate like products for specialty and commodity SSWR and that it include stainless steel bar in the domestic like product definition.<sup>35</sup> Rather, the Commission defined the domestic like product to be all SSWR, coextensive with Commerce's scope.<sup>36</sup> In the prior five-year reviews, the

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<sup>29</sup> Certain Stainless Steel Wire Rods From India: Final Results of the Expedited Sunset Review of the Antidumping Duty Order, 87 Fed. Reg. 45,083 (July 27, 2022); Department of Commerce memorandum from Alex Villanueva to Lisa W. Wang Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Antidumping Duty Order on Certain Stainless Steel Wire Rods from India, July 15, 2022, at 2.

<sup>30</sup> CR/PR at I-11.

<sup>31</sup> CR/PR at I-11.

<sup>32</sup> CR/PR at I-11-12.

<sup>33</sup> CR/PR at I-12.

<sup>34</sup> CR/PR at I-13.

<sup>35</sup> *Original Determination*, USITC Pub. 2704 at I-5-8.

<sup>36</sup> *Original Determination*, USITC Pub. 2704 at I-8.

Commission defined the domestic like product as it had in the original investigations, consisting of all SSWR, coextensive with Commerce's scope.<sup>37</sup>

*Current Five-Year Review.* The record of this review contains no new information suggesting that the characteristics and uses of domestically produced SSWR have changed since the original investigations so as to warrant revisiting the Commission's domestic like product definition.<sup>38</sup> Domestic Interested Parties agree with the Commission's definition of the domestic like product from the prior proceedings.<sup>39</sup> Accordingly, we again define a single domestic like product consisting of all SSWR, coextensive with Commerce's scope for this review.

## **B. Domestic Industry**

Section 771(4)(A) of the Tariff Act defines the relevant industry 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>40</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.

There were no related parties issues in the original investigations or prior five-year reviews. In the original investigations, the Commission found a single domestic industry consisting of all domestic producers of SSWR.<sup>41</sup> In each of the prior five-year reviews, the Commission found that the record did not contain new information that would suggest any reason for revisiting the definition of the domestic industry made in the original investigations.<sup>42</sup> As a result, the Commission, in each of the prior five-year reviews, found a single domestic industry consisting of all domestic producers of SSWR.<sup>43</sup>

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<sup>37</sup> *First Reviews*, USITC Pub. 3321 at 6; *Second Reviews*, USITC Pub. 3866 at 6; *Third Review*, USITC Pub. 4300 at 5; *Fourth Review*, USITC Pub. 4695, at 7.

<sup>38</sup> See generally CR/PR at I-11-17.

<sup>39</sup> Domestic Interested Parties' Substantive Response at 25.

<sup>40</sup> 19 U.S.C. § 1677(4)(A). The definitions in 19 U.S.C. § 1677 are applicable to the entire subtitle containing the antidumping and countervailing duty laws, including 19 U.S.C. §§ 1675 and 1675a. See 19 U.S.C. § 1677.

<sup>41</sup> *Original Determination*, USITC Pub. 2704 at I-8-11.

<sup>42</sup> *First Reviews*, USITC Pub. 3321 at 6; *Second Reviews*, USITC Pub. 3866 at 7; *Third Review*, USITC Pub. 4300 at 6; *Fourth Review*, USITC Pub. 4695 at 7.

<sup>43</sup> *First Reviews*, USITC Pub. 3321 at 6; *Second Reviews*, USITC Pub. 3866 at 7; *Third Review*, USITC Pub. 4300 at 6; *Fourth Review*, USITC Pub. 4695 at 7.

Domestic Interested Parties agree with the Commission’s definition of the domestic industry from the prior proceedings.<sup>44</sup> There are no related parties issues in this review.<sup>45</sup> Consequently, we define a single domestic industry consisting of all U.S. producers of SSWR.

### **III. Revocation of the Antidumping Order Would Likely Lead to Continuation or Recurrence of Material Injury Within a Reasonably Foreseeable Time**

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

In a five-year review conducted under section 751(c) of the Tariff Act, Commerce will revoke an antidumping or countervailing duty order unless: (1) it makes a determination that dumping or subsidization is likely to continue or recur and (2) the Commission makes a determination that revocation of the antidumping or countervailing duty order “would be likely to lead to continuation or recurrence of material injury within a reasonably foreseeable time.”<sup>46</sup> The SAA states that “under the likelihood standard, the Commission will engage in a counterfactual analysis; it must decide the likely impact in the reasonably foreseeable future of an important change in the status quo – the revocation or termination of a proceeding and the elimination of its restraining effects on volumes and prices of imports.”<sup>47</sup> Thus, the likelihood standard is prospective in nature.<sup>48</sup> The CIT has found that “likely,” as used in the five-year review provisions of the Act, means “probable,” and the Commission applies that standard in five-year reviews.<sup>49</sup>

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<sup>44</sup> Domestic Interested Parties’ Substantive Response at 25.

<sup>45</sup> CR/PR at I-14 n. 48.

<sup>46</sup> 19 U.S.C. § 1675a(a).

<sup>47</sup> SAA at 883-84. The SAA states that “{t}he likelihood of injury standard applies regardless of the nature of the Commission’s original determination (material injury, threat of material injury, or material retardation of an industry). Likewise, the standard applies to suspended investigations that were never completed.” *Id.* at 883.

<sup>48</sup> While the SAA states that “a separate determination regarding current material injury is not necessary,” it indicates that “the Commission may consider relevant factors such as current and likely continued depressed shipment levels and current and likely continued {sic} prices for the domestic like product in the U.S. market in making its determination of the likelihood of continuation or recurrence of material injury if the order is revoked.” SAA at 884.

<sup>49</sup> See *NMB Singapore Ltd. v. United States*, 288 F. Supp. 2d 1306, 1352 (Ct. Int’l Trade 2003) (“‘likely’ means probable within the context of 19 U.S.C. § 1675(c) and 19 U.S.C. § 1675a(a)”), *aff’d mem.*, 140 Fed. Appx. 268 (Fed. Cir. 2005); *Nippon Steel Corp. v. United States*, 26 CIT 1416, 1419 (2002) (same); *Usinor Industeel, S.A. v. United States*, 26 CIT 1402, 1404 nn.3, 6 (2002) (“more likely than not” standard is “consistent with the court’s opinion;” “the court has not interpreted ‘likely’ to imply any particular degree of ‘certainty’”); *Indorama Chemicals (Thailand) Ltd. v. United States*, 26 CIT 1059, 1070 (2002) (“standard is based on a likelihood of continuation or recurrence of injury, not a certainty”); (Continued...)

The statute states that “the Commission shall consider that the effects of revocation or termination may not be imminent, but may manifest themselves only over a longer period of time.”<sup>50</sup> According to the SAA, a “‘reasonably foreseeable time’ will vary from case-to-case, but normally will exceed the ‘imminent’ timeframe applicable in a threat of injury analysis in original investigations.”<sup>51</sup>

Although the standard in a five-year review is not the same as the standard applied in an original investigation, it contains some of the same fundamental elements. The statute provides that the Commission is to “consider the likely volume, price effect, and impact of imports of the subject merchandise on the industry if the orders are revoked or the suspended investigation is terminated.”<sup>52</sup> It directs the Commission to take into account its prior injury determination, whether any improvement in the state of the industry is related to the order or the suspension agreement under review, whether the industry is vulnerable to material injury if an order is revoked or a suspension agreement is terminated, and any findings by Commerce regarding duty absorption pursuant to 19 U.S.C. § 1675(a)(4).<sup>53</sup> The statute further provides that the presence or absence of any factor that the Commission is required to consider shall not necessarily give decisive guidance with respect to the Commission’s determination.<sup>54</sup>

In evaluating the likely volume of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether the likely volume of imports would be significant either in absolute terms or relative to production or consumption in the United States.<sup>55</sup> In doing so, the Commission must consider “all relevant economic factors,” including four enumerated factors: (1) any likely

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(...Continued)

*Usinor v. United States*, 26 CIT 767, 794 (2002) (“‘likely’ is tantamount to ‘probable,’ not merely ‘possible’”).

<sup>50</sup> 19 U.S.C. § 1675a(a)(5).

<sup>51</sup> SAA at 887. Among the factors that the Commission should consider in this regard are “the fungibility or differentiation within the product in question, the level of substitutability between the imported and domestic products, the channels of distribution used, the methods of contracting (such as spot sales or long-term contracts), and lead times for delivery of goods, as well as other factors that may only manifest themselves in the longer term, such as planned investment and the shifting of production facilities.” *Id.*

<sup>52</sup> 19 U.S.C. § 1675a(a)(1).

<sup>53</sup> 19 U.S.C. § 1675a(a)(1). Commerce has not made duty absorption findings with respect to the antidumping duty order under review. See Department of Commerce memorandum from Alex Villanueva to Lisa W. Wang *Issues and Decision Memorandum for the Final Results of the Expedited Sunset Review of the Antidumping Duty Order on Certain Stainless Steel Wire Rod from India*, July 15, 2022, at 4.

<sup>54</sup> 19 U.S.C. § 1675a(a)(5). Although the Commission must consider all factors, no one factor is necessarily dispositive. SAA at 886.

<sup>55</sup> 19 U.S.C. § 1675a(a)(2).



increase in production capacity or existing unused production capacity in the exporting country; (2) existing inventories of the subject merchandise, or likely increases in inventories; (3) the existence of barriers to the importation of the subject merchandise into countries other than the United States; and (4) 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.<sup>56</sup>

In evaluating the likely price effects of subject imports if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider whether there is likely to be significant underselling by the subject imports as compared to the domestic like product and whether the subject imports are likely to enter the United States at prices that otherwise would have a significant depressing or suppressing effect on the price of the domestic like product.<sup>57</sup>

In evaluating the likely impact of imports of subject merchandise if an order under review is revoked and/or a suspended investigation is terminated, the Commission is directed to consider all relevant economic factors that are likely to have a bearing on the state of the industry in the United States, including but not limited to the following: (1) likely declines in output, sales, market share, profits, productivity, return on investments, and utilization of capacity; (2) likely negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment; and (3) likely negative effects on the existing development and production efforts of the industry, including efforts to develop a derivative or more advanced version of the domestic like product.<sup>58</sup> All relevant economic factors are to be considered within the context of the business cycle and the conditions of competition that are distinctive to the industry. As instructed by the statute, we have considered the extent to which any improvement in the state of the domestic industry is related to the orders under review and whether the industry is vulnerable to material injury upon revocation.<sup>59</sup>

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<sup>56</sup> 19 U.S.C. § 1675a(a)(2)(A-D).

<sup>57</sup> See 19 U.S.C. § 1675a(a)(3). The SAA states that “{c}onsistent with its practice in investigations, in considering the likely price effects of imports in the event of revocation and termination, the Commission may rely on circumstantial, as well as direct, evidence of the adverse effects of unfairly traded imports on domestic prices.” SAA at 886.

<sup>58</sup> 19 U.S.C. § 1675a(a)(4).

<sup>59</sup> The SAA states that in assessing whether the domestic industry is vulnerable to injury if the order is revoked, 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 may also demonstrate that an industry is facing difficulties from a variety of sources and is vulnerable to dumped or subsidized imports.” SAA at 885.

No respondent interested party participated in this expedited review. Therefore, the record contains limited new information with respect to the SSWR industry in India.<sup>60</sup> There is also limited information about the SSWR market in the United States during the period of review.<sup>61</sup> Accordingly, for our determination, we rely as appropriate on information provided by Domestic Interested Parties, the facts available from the original investigations and prior five-year reviews, publicly available information gathered by Commission staff, and the limited new information on the record of this five-year review.

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

In evaluating the likely impact of the subject imports on the domestic industry if an order is revoked, the statute directs the Commission to consider all relevant economic factors “within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”<sup>62</sup> The following conditions of competition inform our determination.

### **1. The Original Investigations and Prior Five-Year Reviews**

*Original Investigations.* The Commission found that apparent U.S. consumption increased 11.5 percent between 1990 and 1992.<sup>63</sup> It highlighted the fact that two-thirds of SSWR production was captively consumed by the domestic industry in the production of wire and small diameter bar.<sup>64</sup> The Commission found that this “shielded” the industry to some extent from effects of subject imports sold at less than fair value, although it recognized the indirect effect of subject imports on the domestic industry’s captive consumption.<sup>65</sup>

*First Five-Year Reviews.* The Commission found that SSWR was produced in a wide variety of sizes and grades, typically in accordance with customer requirements.<sup>66</sup> It also observed that overall demand for SSWR did not respond significantly to price changes as there were few substitutes.<sup>67</sup> During the period of review, demand for SSWR in the United States increased by approximately 5.0 to 7.0 percent annually.<sup>68</sup> The domestic industry had undergone substantial consolidation, and Carpenter and its subsidiary Talley accounted for \*\*\*

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<sup>60</sup> See CR/PR at I-21-22.

<sup>61</sup> See generally CR/PR at I-17-21.

<sup>62</sup> 19 U.S.C. § 1675a(a)(4).

<sup>63</sup> *Original Determination*, USITC Pub. 2704 at I-12.

<sup>64</sup> *Original Determination*, USITC Pub. 2704 at I-12.

<sup>65</sup> *Original Determination*, USITC Pub. 2704 at I-12.

<sup>66</sup> *First Reviews*, USITC Pub. 3321 at 14.

<sup>67</sup> *First Reviews*, USITC Pub. 3321 at 14.

<sup>68</sup> *First Reviews*, USITC Pub. 3321 at 15.

percent of U.S. production of SSWR.<sup>69</sup> While the domestic industry had increased capacity, declining production contributed to significant decreases in its capacity utilization.<sup>70</sup> The Commission further observed that manufacturers could produce products other than SSWR (e.g., bar and wire) using the same equipment and were therefore able to switch production among the different products.<sup>71</sup> Nonsubject imports accounted for approximately \*\*\* percent of the U.S. market in 1998 and 1999.<sup>72</sup>

*Second Five-Year Reviews.* The Commission determined that demand for SSWR largely depended on demand for downstream products in the automotive, medical instruments, and general manufacturing industries.<sup>73</sup> Thus, the Commission found that demand for end-use applications such as wire bar, screens, antennas, fasteners, wiper blades, and certain types of belts determined demand for SSWR.<sup>74</sup> Apparent U.S. consumption fluctuated but generally fell over the period of review, which the Commission attributed to the movement of end-use customers overseas, increased imports of finished products, and the substitution of wire for SSWR in downstream applications.<sup>75</sup> The Commission found that a substantial portion of domestic SSWR production was internally consumed, raw materials constituted a substantial portion of the cost of producing SSWR, and energy prices, particularly natural gas, had increased during the period of review.<sup>76</sup> Imports accounted for a substantial but decreasing portion of apparent U.S. consumption during the period of review.<sup>77</sup>

*Third Five-Year Review.* The Commission again found that demand, which had decreased since the second five-year review, was driven primarily by demand for downstream products such as industrial fasteners, springs, medical and dental instruments, automotive parts, and welding electrodes.<sup>78</sup> It observed that subject imports accounted for \*\*\* percent and nonsubject imports accounted for \*\*\* percent of apparent U.S. consumption in 2010.<sup>79</sup> The Commission also found that the domestic like product, subject imports, and nonsubject imports were generally substitutable and that price was an important factor in purchasing decisions.<sup>80</sup>

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<sup>69</sup> First Reviews, USITC Pub. 3321 at 15; Confidential First Reviews Views at 18.

<sup>70</sup> *First Reviews*, USITC Pub. 3321 at 15.

<sup>71</sup> *First Reviews*, USITC Pub. 3321 at 14-15.

<sup>72</sup> First Reviews, USITC Pub. 3321 at 15; Confidential First Reviews Views at 18.

<sup>73</sup> *Second Reviews*, USITC Pub. 3866 at 17.

<sup>74</sup> *Second Reviews*, USITC Pub. 3866 at 17.

<sup>75</sup> *Second Reviews*, USITC Pub. 3866 at 18.

<sup>76</sup> *Second Reviews*, USITC Pub. 3866 at 18-19.

<sup>77</sup> *Second Reviews*, USITC Pub. 3866 at 19.

<sup>78</sup> *Third Review*, USITC Pub. 4300 at 9.

<sup>79</sup> Third Review, USITC Pub. 4300 at 9-10; Confidential Third Review Views at 12.

<sup>80</sup> *Third Review*, USITC Pub. 4300 at 10.

*Fourth Five-Year Review.* The Commission observed that apparent U.S. consumption was significantly higher in 2015 than in 2010 but still lower than in the original investigations and the first and second five-year reviews.<sup>81</sup> Further, the domestic industry's share of apparent U.S. consumption was \*\*\* higher during the period of review than during the second five-year reviews but lower than in the third five-year review.<sup>82</sup> Subject imports had an extremely limited presence in the U.S. market during the period of review, accounting for \*\*\* percent of apparent U.S. consumption, the same as in 2005 and 2010.<sup>83</sup> The share of apparent U.S. consumption held by nonsubject imports, at \*\*\* percent in 2015, was \*\*\* lower than in 2005 but higher than in 2010.<sup>84</sup> The Commission also found that subject imports and the domestic like product were generally substitutable and that price was of paramount importance in purchasing decisions.<sup>85</sup>

## **2. The Current Review**

### **a) Demand Conditions**

The information available indicates that demand for SSWR continues to be largely dependent on demand for downstream products in the automotive, medical instruments, and general manufacturing industries.<sup>86</sup> Domestic Interested Parties assert that demand for SSWR over the current period of review tracked the general trends of the U.S. economy, which experienced fluctuations during 2016-2019, a decline in 2020, then a slight increase in 2021.<sup>87</sup> In their view, the decrease in demand in 2020 reflected the negative impact of the COVID-19 pandemic while the slight increase in 2021 reflected the economic recovery.<sup>88</sup> Apparent U.S.

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<sup>81</sup> *Fourth Review*, USITC Pub. 4695 at 12; Revision to the Third Review Staff Report, Memorandum INV-JJ-128 (Dec. 14, 2011) ("Third Review Revision Memo"), EDIS Doc. No. 773304, at Table I-3.

<sup>82</sup> *Fourth Review*, USITC Pub. 4695 at 12; *Confidential Fourth Review Views* at 17; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3. The domestic industry was comprised of the same five producers from the third five-year review. *Fourth Review*, USITC Pub. 4695 at 12.

<sup>83</sup> *Fourth Review*, USITC Pub. 4695 at 13; *Confidential Fourth Review Views* at 18.

<sup>84</sup> *Fourth Review*, USITC Pub. 4695 at 13; *Confidential Fourth Review Views* at 18; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3.

<sup>85</sup> *Fourth Review*, USITC Pub. 4695 at 13; *Confidential Fourth Review Views* at 18.

<sup>86</sup> CR/PR at I-11-13; Domestic Interested Parties' Substantive Response at 25.

<sup>87</sup> Domestic Interested Parties' Substantive Response at 25.

<sup>88</sup> Domestic Interested Parties' Substantive Response at 25.

consumption of SSWR was \*\*\* short tons in 2021, which was higher than in 2010 but lower than in 1992, 1999, 2005, and 2015.<sup>89</sup>

### **b) Supply Conditions**

Domestic Interested Parties claim that no suppliers have entered or departed from the U.S. market since the fourth five-year review.<sup>90</sup> Although the domestic industry remained the largest source of SSWR in the U.S. market in 2021, its share of apparent U.S. consumption that year, at \*\*\* percent, was lower than its share of apparent U.S. consumption in 1992, 1999, 2005, 2010, and 2015.<sup>91</sup>

Subject imports were the smallest source of SSWR in the U.S. market in 2021, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>92</sup> This was \*\*\* higher than the subject import share of apparent U.S. consumption in 2005, 2010, and 2015.<sup>93</sup>

Nonsubject imports were the second largest source of SSWR in the U.S. market in 2021, accounting for \*\*\* percent of apparent U.S. consumption that year.<sup>94</sup> This was higher than the nonsubject import share of apparent U.S. consumption in 1992, 1999, 2005, 2010, and 2015.<sup>95</sup> The leading country sources of nonsubject imports in 2021 were China, Taiwan, and the United Kingdom.<sup>96</sup>

### **c) Substitutability and Other Conditions**

The record in this review contains no new information to indicate that the degree of substitutability between the domestic like product and subject imports or the importance of price in purchasing decisions have changed since the prior proceedings. The Domestic Interested Parties contend that the U.S. market for SSWR remains highly price-sensitive based

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<sup>89</sup> CR/PR at Table I-8; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3. Apparent U.S. consumption was 131,521 shorts tons in 1992, \*\*\* short tons in 1999, \*\*\* short tons in 2005, \*\*\* short tons in 2010, and \*\*\* short tons in 2015. *Id.*

<sup>90</sup> CR/PR at I-11-13; Domestic Interested Parties' Substantive Response at 25.

<sup>91</sup> CR/PR at Table I-8; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3.

<sup>92</sup> CR/PR at Table I-8. The subject import share of apparent U.S. consumption in 2021 may be overstated due to the inclusion of imports from nonsubject sources in India, as official import statistics do not distinguish between subject and nonsubject sources in India. *Id.* at I-21.

<sup>93</sup> CR/PR at Table I-8; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3.

<sup>94</sup> CR/PR at Table I-8.

<sup>95</sup> CR/PR at Table I-8; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3. Nonsubject imports' share of apparent U.S. consumption may be understated due to the official import statistics not distinguishing between subject and nonsubject sources from India. CR/PR at I-21.

<sup>96</sup> CR/PR at Table I-8.

on the continued substitutable nature of SSWR from all sources.<sup>97</sup> Accordingly, we continue to find that subject imports and domestically produced SSWR are generally substitutable, and that price remains important in purchasing decisions for SSWR.

In March 2018, SSWR produced in India became subject to an additional 25.0 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended.<sup>98</sup>

### C. Likely Volume of Subject Imports

#### 1. The Original Investigation and Prior Five-Year Reviews

*Original Investigations.* Having cumulated imports of SSWR from Brazil, France, and India, the Commission observed that the market share of cumulated subject imports increased while the domestic producers' market share declined.<sup>99</sup> The market share of cumulated subject imports increased from 5.7 percent in 1990 to 14.3 percent in 1992.<sup>100</sup> The domestic producers' market share fell from 79.4 percent in 1990 to 68.0 percent in 1992.<sup>101</sup> The Commission found the volume of cumulated subject imports, and the increase in that volume, to be significant.<sup>102</sup>

*First Five-Year Reviews.* The Commission found that capacity in India increased from 1997 to 1999 and that unused capacity in India was equivalent to \*\*\* percent of U.S. production and \*\*\* percent of U.S. apparent consumption in 1999.<sup>103</sup> India's exports of SSWR to the United States also accelerated from 1997 to 1999.<sup>104</sup> Mukand, which estimated that it accounted for \*\*\* of Indian production, announced plans in 1999 to increase its exports of stainless steel by 50 percent over the previous year.<sup>105</sup> The Commission indicated that the United States was a particularly attractive market as U.S. prices were higher than anywhere else

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<sup>97</sup> Domestic Interested Parties' Substantive Response at 14.

<sup>98</sup> CR/PR at I-11. U.S. imports of certain iron and steel articles originating in Australia, Canada, Mexico, and Ukraine are exempt from Section 232 duties; imports originating in Argentina, Brazil, and South Korea are exempt from Section 232 duties within annual quota limits; imports originating in European Union member countries, Japan, and the United Kingdom are subject to tariff rate quotas; and imports from all other countries are subject to 25 percent additional duties. *Id.* SSWR imported from India otherwise enters the U.S. market at a column 1-general duty rate of "free." *Id.*

<sup>99</sup> *Original Determination*, USITC Pub. 2704 at I-17-18.

<sup>100</sup> *Original Determination*, USITC Pub. 2704 at I-17. An alternative analysis concerning subject imports from India evaluated separately joined by three of the four affirmative-voting Commissioners indicated that the market share of subject imports from India increased from 0.1 percent in 1990 to 3.3 percent in 1992. *Id.* at I-19.

<sup>101</sup> *Original Determination*, USITC Pub. 2704 at Table I-2.

<sup>102</sup> *Original Determination*, USITC Pub. 2704 at I-18.

<sup>103</sup> First Reviews, USITC Pub. 3321 at 17; Confidential First Reviews Views at 20.

<sup>104</sup> *First Reviews*, USITC Pub. 3321 at 17.

<sup>105</sup> First Reviews, USITC Pub. 3321 at 17; Confidential First Reviews Views at 21.

in the world.<sup>106</sup> Although most of Mukand's production of rod was \*\*\*, Mukand stated that \*\*\*.<sup>107</sup> The Commission concluded that the cumulated volume of subject imports from Brazil and India would be significant in the reasonably foreseeable future.<sup>108</sup>

*Second Five-Year Reviews.* Considering subject imports from India separately, the Commission found that the industry in India had significant excess capacity available to increase production of SSWR and thereby increase subject exports to the United States in the event of revocation.<sup>109</sup> The Commission also found that the likely volume of subject imports would be significant absent the order given the significant excess capacity in India, the presence of SSWR from India in the U.S. market during the period of review, and the rapid increase in subject imports during the original investigations.<sup>110</sup>

*Third Five-Year Review.* The Commission found that subject producers possessed significant excess capacity and remained export oriented.<sup>111</sup> Further, it found no indication that subject producers had reduced their capacity to produce SSWR.<sup>112</sup> In 2010, India's global stainless steel bar and rod exports were valued at \$127.3 million, or the equivalent of \*\*\* percent of apparent U.S. consumption of SSWR in that year.<sup>113</sup> Moreover, the Commission concluded that the United States would be an attractive market for the Indian SSWR industry absent the order.<sup>114</sup> Thus, the Commission found that the likely volume of subject imports would be significant were the order to be revoked.<sup>115</sup>

*Fourth Five-Year Review.* The Commission found that subject producers in India possessed capacity similar to that in the third five-year review, and remained export oriented, and subject imports had maintained a minimal presence in the U.S. market during the period of review.<sup>116</sup> In 2015, India's global stainless steel bar and rod exports were valued at nearly \$90.0 million, or the equivalent of nearly \*\*\* percent of apparent U.S. consumption of SSWR that year.<sup>117</sup> The Commission also found no evidence of changes in the attractiveness of the U.S.

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<sup>106</sup> *First Reviews*, USITC Pub. 3321 at 17.

<sup>107</sup> *First Reviews*, USITC Pub. 3321 at 17; Confidential *First Reviews Views* at 21.

<sup>108</sup> *First Reviews*, USITC Pub. 3321 at 17.

<sup>109</sup> *Second Reviews*, USITC Pub. 3866 at 31-32.

<sup>110</sup> *Second Reviews*, USITC Pub. 3866 at 32.

<sup>111</sup> *Third Review*, USITC Pub. 4300 at 11.

<sup>112</sup> *Third Review*, USITC Pub. 4300 at 11.

<sup>113</sup> *Third Review*, USITC Pub. 4300 at 11; Confidential *Third Review Views* at 15.

<sup>114</sup> *Third Review*, USITC Pub. 4300 at 11-12.

<sup>115</sup> *Third Review*, USITC Pub. 4300 at 12.

<sup>116</sup> *Fourth Review*, USITC Pub. 4695 at 14-15.

<sup>117</sup> *Fourth Review*, USITC Pub. 4695 at 15; Confidential *Fourth Review Views* at 21.

market to Indian producers since the last review.<sup>118</sup> Accordingly, the Commission found that the likely volume of subject imports would be significant if the order were revoked.<sup>119</sup>

## 2. The Current Review

Subject imports maintained a limited presence in the U.S. market during the period of review under the disciplining effect of the order.<sup>120</sup> Subject import volume was 1,174 short tons in 2016, it ranged between 1 and 37 short tons during 2017-2020, and then increased to 314 short tons in 2021.<sup>121</sup>

The record in this expedited review contains limited information on the subject industry in India.<sup>122</sup> The information available in the current review, however, indicates that subject producers have the means and incentive to increase their exports of subject merchandise to the U.S. market to significant levels if the order were revoked. Domestic Interested Parties provided a list of thirteen possible producers of SSWR in India.<sup>123</sup> Further, publicly available information on subject producers indicates that they possess large and in some cases increasing capacities for the production of SSWR, among other products.<sup>124</sup> An industry publication from

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<sup>118</sup> Fourth Review, USITC Pub. 4695 at 15; Confidential Fourth Review Views at 21-22.

<sup>119</sup> *Fourth Review*, USITC Pub. 4695 at 15.

<sup>120</sup> CR/PR at Table I-7.

<sup>121</sup> CR/PR at Table I-7. As previously noted, subject import volume from India may be overstated by the inclusion of imports from nonsubject sources in India in official import statistics. *Id.*

<sup>122</sup> *See* CR/PR at I-21-23.

<sup>123</sup> Domestic Interested Parties' Substantive Response at 9-11, 20-23.

<sup>124</sup> Domestic Interested Parties' Substantive Response at 9-11, Exh. 3. According to the information provided by Domestic Interested Parties, in June 2021, subject producer Mukand Ltd. announced an increase in stainless steel production from 100,000 metric tons to 150,000 metric tons. *Id.* at 10; CR/PR at Table I-9. This information also indicates that subject producer Rajputana Stainless Limited has grown three-fold over the last three years to possess a capacity of 50,000 metric tons for stainless steel products including SSWR. Domestic Interested Parties' Substantive Response at 10, Exh. 3. The information provided by the Domestic Interested Parties also indicates that the following subject producers possess substantial capacity for the production of SSWR, among other products: Alok Ingots (Mumbai) Pvt. Ltd. ("Alok"), with capacity of 50,000 tons for metal products including SSWR; Bhansali Bright Bars Pvt. Ltd. ("Bhansali"), with capacity of 10,000 metric tons for stainless steel bars and rods; India Steel Works Limited, with a capacity of 180,000 metric tons for stainless steel bars and rods; Jay Jagdamba Limited ("Jay"), with a capacity of 80,000 metric tons for steel products including SSWR; Mohan Steels Limited, with a capacity of 240,000 metric tons for long products including SSWR; Panchmatal Steel Limited ("Panchmatel"), with a capacity of 72,000 metric tons for products including stainless steel bars and rods; Rimjhim Ispat Ltd. ("Rimjhim"), with a capacity of 3,500,000 metric tons for steel products including SSWR; Sunflag Iron & Steel Company Ltd. ("Sunflag"), with a capacity of 500,000 metric tons for various products including SSWR; and Venus Wire Industries Pvt. Ltd. ("Venus"), with a capacity of 60,000 metric tons for stainless steel long products, including SSWR. *Id.* at 9-11, Exh. 3.



*Steel Market Intelligence* identifies India as the world's second largest SSWR-producing country.<sup>125</sup> Furthermore, the available information indicates that subject producers are export oriented, with several touting exports to the United States.<sup>126</sup> Consistent with the information provided by Domestic Interested Parties, Global Trade Atlas data show that in 2021, India was the seventh largest global exporter of bars and rods of stainless steel, hot-rolled, in irregularly wound coils, a category that includes SSWR and out-of-scope products.<sup>127</sup> Thus, the available information indicates that the subject industry in India remains large and export oriented.

Available information also indicates that the U.S. market remains attractive to subject producers. Subject imports have remained in the U.S. market in limited quantities during the period of review while under the disciplining effect of the order, accounting for \*\*\* percent of apparent U.S. consumption in 2021.<sup>128</sup> Additionally, Indian export data for bars and rods of stainless steel, hot-rolled, in irregularly wound coils, a category that includes SSWR and out-of-scope products, indicates that exports to the U.S. generally had higher AUVs than India's exports to other markets over the POR.<sup>129</sup> Moreover, there is no available evidence of changes since the past reviews that would suggest that the Indian SSWR would no longer find the United States to be an attractive market absent the antidumping duty order.

Given the foregoing, including the significant volume of subject imports during the original investigation, the subject industry's substantial capacity and export orientation, and the continuing attractiveness of the U.S. market to subject producers, we find that the volume of subject imports would likely be significant, both in absolute terms and relative to consumption in the United States, if the order were revoked.<sup>130</sup>

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<sup>125</sup> Domestic Interested Parties' Substantive Response at 9, Exh. 2.

<sup>126</sup> See generally Domestic Interested Parties' Substantive Response at 9-11, Exh. 3. According to the information provided by the Domestic Interested Parties, the following subject producers are reportedly export oriented: Alok, Bhansali (exporting 60 to 80 percent of its total sales), Jay (exporting nearly 90 percent of its production), Mukand Ltd. (reportedly exports to the United States, among other markets), Panchmatel (exporting 20 to 30 percent of its total shipments), Rimjhim, Shiv Shakti Metal Industries (reportedly exports SSWR to the United States), Sunflag (reportedly exports to the United States, among other markets), Timex Metals, and Venus (exporting 95 percent of its output to North America and Europe). *Id.*

<sup>127</sup> CR/PR at Table I-10.

<sup>128</sup> CR/PR at Table I-8. Subject imports' share of apparent U.S. consumption may be overstated because official import statistics do not distinguish between subject and nonsubject sources from India. *Id.* at I-21.

<sup>129</sup> Domestic Interested Parties' Substantive Response at Exh. 4.

<sup>130</sup> We note that the imposition of a 25 percent duty on imports of SSWR from India pursuant to section 232 in 2018 did not prevent such imports from increasing irregularly from 37 short tons in 2018 to 314 short tons in 2021, a level higher than in 2005, 2010, or 2015. CR/PR at Tables I-7-8; Third Review Revision Memo, EDIS Doc. No. 773304, at Table I-3. Given this, the substantial capacity and export (Continued...)

## D. Likely Price Effects

### 1. The Original Investigation and Prior Five-Year Reviews

*Original Investigations.* The Commission observed that prices for the five products for which the Commission made comparisons trended downward, despite an increase in domestic consumption of 11.5 percent between 1990 and 1992.<sup>131</sup> The U.S. price of the most common grade of SSWR, AISI grade 304, declined by nearly 15.0 percent during the period of investigation.<sup>132</sup> Price comparisons in the original investigations revealed that subject imports from India undersold domestic SSWR in almost all comparisons.<sup>133</sup> Prices for subject imports from India declined steadily and were consistently below prices for the domestically produced product during the period.<sup>134</sup>

*First Five-Year Reviews.* The Commission found that subject imports were substitutable for the domestic like product and purchasing decisions were usually based on price.<sup>135</sup> Furthermore, demand was relatively inelastic while the domestic elasticity of supply was high in the U.S. market.<sup>136</sup> Prices for domestically produced SSWR were generally flat or fell over the period of review.<sup>137</sup> The available data indicated consistent underselling by subject imports from India during the period of review, despite the order.<sup>138</sup> Given the likely significant volume, the substitutability of the cumulated subject imports, the underselling with the orders in place, and the consistent underselling by subject imports in the original investigations, the Commission found that the cumulated subject imports from Brazil and India would likely be

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(...Continued)

orientation of subject producers, and the attractiveness of the U.S. market to subject producers, the information available indicates that this duty would not prevent subject imports from increasing significantly if the order were revoked.

The record does not contain data addressing existing inventories of the subject merchandise or the potential for product shifting.

<sup>131</sup> *Original Determination*, USITC Pub. 2704 at I-18. The Commission considered respondents' argument that declining domestic prices were fully attributed to declines in raw material prices. It found that the domestic producers' costs rose over the period of investigations, belying any possible connection between raw material cost reductions and the observed price declines. *Id.*

<sup>132</sup> *Original Determination*, USITC Pub. 2704 at I-18.

<sup>133</sup> *Original Determination*, USITC Pub. 2704 at I-18.

<sup>134</sup> *Original Determination*, USITC Pub. 2704 at I-18.

<sup>135</sup> *First Reviews*, USITC Pub. 3321 at 18.

<sup>136</sup> *First Reviews*, USITC Pub. 3321 at 18.

<sup>137</sup> *First Reviews*, USITC Pub. 3321 at 18.

<sup>138</sup> *First Reviews*, USITC Pub. 3321 at 18.

priced aggressively and have significant depressing and suppressing effects on prices of the domestic like product if the orders were revoked.<sup>139</sup>

*Second Five-Year Reviews.* The Commission found that, in the absence of the order, subject imports would likely significantly undersell the domestic like product given the likely significant volume of subject imports, the substitutability between subject imports and the domestic like product, evidence in the original investigations of underselling, the importance of price in purchasing decisions, and the relatively weak U.S. demand.<sup>140</sup> Given the rising raw material and energy costs experienced by the domestic industry during the period of review, the Commission concluded that revocation of the antidumping duty order would likely lead to significant underselling by the subject imports and significant price depression and suppression.<sup>141</sup>

*Third Five-Year Review.* In the expedited third five-year review, the Commission adopted findings from the prior five-year reviews that SSWR was a product that competed primarily on the basis of price, and that subject imports and the domestic like product were substitutable.<sup>142</sup> Given the likely significant volume of subject imports, the substitutability between subject imports and the domestic like product, evidence of underselling in the original investigations and prior five-year reviews, and the importance of price in purchasing decisions, the Commission found that if the order were revoked, the likely significant increase in subject import volume, at prices that would likely undersell the domestic like product, would be likely to have significant adverse price effects on the domestic industry.<sup>143</sup>

*Fourth Five-Year Review.* In the expedited fourth five-year review, the Commission again adopted its findings from the prior five-year reviews that SSWR is a product that competes primarily based on price, and that subject imports and the domestic like product are substitutable.<sup>144</sup> Given these factors, the Commission found that, absent the order, subject imports would likely significantly undersell the domestic like product to gain market share, consistent with their behavior in the original investigations, thereby forcing the domestic industry to either lower prices or lose sales.<sup>145</sup>

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<sup>139</sup> *First Reviews*, USITC Pub. 3321 at 18.

<sup>140</sup> *Second Reviews*, USITC Pub. 3866 at 33.

<sup>141</sup> *Second Reviews*, USITC Pub. 3866 at 33.

<sup>142</sup> *Third Review*, USITC Pub. 4300 at 13.

<sup>143</sup> *Third Review*, USITC Pub. 4300 at 13.

<sup>144</sup> *Fourth Review*, USITC Pub. 4695 at 16-17.

<sup>145</sup> *Fourth Review*, USITC Pub. 4695 at 17.

## 2. The Current Review

As discussed in section III.B.2.c above, we continue to find that subject imports and domestically produced SSWR are generally substitutable, and that price is important in purchasing decisions.

The record in these expedited reviews does not contain new product-specific pricing information.<sup>146</sup> Based on the information available, including the substitutability between subject imports and the domestic like product, the importance of price in purchasing decisions, the underselling by subject imports in the original investigations and prior proceedings, and the likely significant increase in subject import volume, we find that if the order were revoked, subject imports would likely undersell the domestic like product, as they did in the original investigations. The likely significant increase in low-priced subject imports would likely take sales and market share from the domestic industry and/or force the industry to cut prices or restrain price increases necessary to cover increasing costs. Consequently, we find that if the order were revoked, significant volumes of subject imports would likely have significant price effects.

### E. Likely Impact

#### 1. The Original Investigation and Prior Five-Year Reviews

*Original Investigations.* The Commission noted the domestic industry's declining production despite increases in apparent U.S. consumption, and characterized capacity utilization as extremely low.<sup>147</sup> U.S. producers reported positive operating income in 1990 and 1991, but significant losses in 1992.<sup>148</sup> The domestic producers' capital expenditures also declined significantly in the later portion of the period under investigation.<sup>149</sup> The Commission concluded that the lower prices of the cumulated subject imports enabled those imports to increase their volume and market share in an expanding market at the expense of the domestic producers, leading to declines in domestic prices, domestic market share, production, shipments, and profitability.<sup>150</sup>

*First Five-Year Reviews.* The Commission found that the condition of the domestic industry, including its financial performance, moderately improved since the original

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<sup>146</sup> See CR/PR at I-10 (discussing decision to conduct an expedited review).

<sup>147</sup> *Original Determination*, USITC Pub. 2704 at I-12.

<sup>148</sup> *Original Determination*, USITC Pub. 2704 at I-13.

<sup>149</sup> *Original Determination*, USITC Pub. 2704 at I-13.

<sup>150</sup> *Original Determination*, USITC Pub. 2704 at I-18-19; *see also Id.* at I-20 (making similar alternative finding for subject imports from India separately).

investigations.<sup>151</sup> While production volumes, capacity utilization, and worker productivity increased, total capacity was lower.<sup>152</sup> The domestic industry's operating income as a ratio to net sales was generally better, and its industry's output, as measured by production and U.S. shipments, increased.<sup>153</sup> However, the domestic industry lost market share, reduced its employment levels, and had an uneven financial performance due to comparable or lower average unit sales.<sup>154</sup> Given the domestic industry's generally positive level of profitability and mixed performance, the Commission did not find the domestic industry to be vulnerable.<sup>155</sup> Nevertheless, the Commission concluded that revocation of the antidumping duty orders on SSWR from Brazil and India would likely lead to a significant increase in the volume of subject imports that would undersell the domestic like product and significantly suppress or depress U.S. prices.<sup>156</sup> It also found that the volume and price effects of the subject imports would likely have a significant adverse impact on the production, shipments, sales, market share, and revenues of the domestic industry.<sup>157</sup>

*Second Five-Year Reviews.* The Commission observed that the domestic industry's performance during the period of review was weak, with operating losses in four of the six years of the period of review.<sup>158</sup> It noted that slim profit margins were not unexpected in a highly competitive market for a low value product, but given the industry's inability to improve to improve its financial performance over the period of review it found the domestic industry to be vulnerable.<sup>159</sup> The Commission found that the significant increase in subject imports from India would be likely to cause a significant decrease in the volume of the domestic industry's shipments as well as have an impact on prices at a time when the industry faced elevated energy and raw material costs.<sup>160</sup> The Commission determined that this would be likely to have an adverse impact on production, shipments, sales, market share, and revenues of the domestic industry.<sup>161</sup>

*Third Five-Year Review.* The Commission found that although some performance indicators had showed improvement since the original investigations, others were worse than

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<sup>151</sup> *First Reviews*, USITC Pub. 3321 at 19.

<sup>152</sup> *First Reviews*, USITC Pub. 3321 at 19.

<sup>153</sup> *First Reviews*, USITC Pub. 3321 at 19.

<sup>154</sup> *First Reviews*, USITC Pub. 3321 at 19.

<sup>155</sup> *First Reviews*, USITC Pub. 3321 at 20.

<sup>156</sup> *First Reviews*, USITC Pub. 3321 at 20.

<sup>157</sup> *First Reviews*, USITC Pub. 3321 at 20.

<sup>158</sup> *Second Reviews*, USITC Pub. 3866 at 26.

<sup>159</sup> *Second Reviews*, USITC Pub. 3866 at 26, 34.

<sup>160</sup> *Second Reviews*, USITC Pub. 3866 at 34.

<sup>161</sup> *Second Reviews*, USITC Pub. 3866 at 34.

before the imposition of the order.<sup>162</sup> Total production and gross profits declined from 1992 to 2010, and operating losses \*\*\* since 1992.<sup>163</sup> The Commission further stated that the limited record information available in the review concerning the domestic industry's condition did not permit it to make a finding as to whether the domestic industry was vulnerable to the continuation or recurrence of material injury in the event the order were revoked.<sup>164</sup>

Given the decrease in demand and the importance of price in purchasing decisions, the Commission found that the likely significant increase in subject imports would likely cause a significant decline in the volume of domestic producers' shipments as well as an adverse effect on prices.<sup>165</sup> This, in turn, would likely adversely affect the domestic industry's output, sales, revenues, and financial performance.<sup>166</sup> The Commission also considered the role of nonsubject imports, but found that they had decreased since the time of the original investigations and there was no indication on the record that the presence of nonsubject imports in the U.S. market would prevent subject imports from entering the United States at levels and prices that would cause injury to the domestic industry.<sup>167</sup> Consequently, the Commission concluded that revocation of the order would likely lead to a significant impact on the domestic industry.<sup>168</sup>

*Fourth Five-Year Review.* The Commission found that the domestic industry's performance was mixed in 2015, with some performance indicators improving while others worsened relative to the industry's performance in the original investigations and prior five-year reviews, but that information on the industry's performance was too limited for the Commission to make a vulnerability finding.<sup>169</sup> It also found that if the order were revoked, the likely significant volume of subject imports and their price effects would likely negatively affect the domestic industry's market share, production, capacity utilization, shipments, net sales values and quantities, employment levels, operating income, operating income margins, and capital investments.<sup>170</sup> Considering the role of nonsubject imports, the Commission found that the likely significant increase in subject import volume after revocation would likely take market share from nonsubject imports as well as the domestic like product.<sup>171</sup>

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<sup>162</sup> *Third Review*, USITC Pub. 4300 at 15.

<sup>163</sup> *Third Review*, USITC Pub. 4300 at 15; Confidential *Third Review Views* at 21.

<sup>164</sup> *Third Review*, USITC Pub. 4300 at 15.

<sup>165</sup> *Third Review*, USITC Pub. 4300 at 15.

<sup>166</sup> *Third Review*, USITC Pub. 4300 at 15.

<sup>167</sup> *Third Review*, USITC Pub. 4300 at 15-16.

<sup>168</sup> *Third Review*, USITC Pub. 4300 at 15-16.

<sup>169</sup> *Fourth Review*, USITC Pub. 4695 at 19.

<sup>170</sup> *Fourth Review*, USITC Pub. 4695 at 19.

<sup>171</sup> *Fourth Review*, USITC Pub. 4695 at 19.

## 2. The Current Review

The record in this expedited review contains limited new information on the domestic industry's performance since the last review. The information available indicates that the domestic industry's performance in 2021 was mixed with respect to some measures but its financial performance was stronger, relative to the industry's performance in the last year of the periods examined in the prior proceedings.<sup>172</sup> The domestic industry's production, capacity, and U.S. shipments, by quantity, were lower in 2021 than in the prior proceedings.<sup>173</sup> Its capacity, production, and U.S. shipments were \*\*\* short tons, \*\*\* short tons, and \*\*\* short tons, respectively.<sup>174</sup> The domestic industry's U.S. shipments were valued at \*\*\*, its net sales revenues were \*\*\*, and its capacity utilization was \*\*\* percent, all lower than in 2010 and 2015 but higher than in 1992, 1999, and 2005.<sup>175</sup> The domestic industry's gross profit, operating income, and operating income to net sales were all higher in 2021 than in the prior proceedings.<sup>176</sup> Specifically, gross profit was \*\*\* and operating income was \*\*\*, equivalent to \*\*\* percent of net sales.<sup>177</sup> Furthermore, the domestic industry's cost of goods sold ("COGS") to net sales ratio was lower in 2021 than in the prior proceedings.<sup>178</sup> This limited information is insufficient for us to make a finding on whether the domestic industry is vulnerable to the continuation or recurrence of material injury in the event of revocation of the order.

Based on the information available in this review, we find that revocation of the order would likely result in a significant volume of subject imports that would likely undersell the

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<sup>172</sup> CR/PR at Table I-6.

<sup>173</sup> CR/PR at Table I-6.

<sup>174</sup> CR/PR at Table I-6. The domestic industry's capacity and production were \*\*\* short tons and \*\*\* short tons, respectively, in 1992; \*\*\* short tons and \*\*\* short tons, respectively, in 1999; \*\*\* short tons and \*\*\* short tons, respectively, in 2005; \*\*\* short tons and \*\*\* short tons, respectively, in 2010; and \*\*\* short tons and \*\*\* short tons, respectively, in 2015. *Id.* The industry's U.S. shipments were \*\*\* short tons in 1992, \*\*\* short tons in 1999, \*\*\* in short tons 2005, \*\*\* short tons in 2010, and \*\*\* short tons in 2015. *Id.*

<sup>175</sup> CR/PR at Table I-6. The domestic industry's U.S. shipments were valued at \*\*\* in 1992, \*\*\* in 1999, \*\*\* in 2005, \*\*\* in 2010, and \*\*\* in 2015. *Id.* Its net sales were \*\*\* in 1992, \*\*\* in 1999, \*\*\* in 2005, \*\*\* in 2010, and \*\*\* in 2015. *Id.* Its capacity utilization was \*\*\* percent in 1992, \*\*\* percent in 1999, \*\*\* percent in 2005, \*\*\* percent in 2010, and \*\*\* percent in 2015. *Id.*

<sup>176</sup> CR/PR at Table I-6.

<sup>177</sup> CR/PR at Table I-6. The domestic industry's gross profit was \*\*\* in 1992, \*\*\* in 1999, \*\*\* in 2005, \*\*\* in 2010, and \*\*\* in 2015. *Id.* The domestic industry's operating income and its percent of net sales were \*\*\* in 1992, \*\*\* and \*\*\* percent in 1999, \*\*\* and \*\*\* in 2005, \*\*\* and \*\*\* percent in 2010, and \*\*\* and \*\*\* percent in 2015, respectively. *Id.*

<sup>178</sup> CR/PR at Table I-6. The domestic industry's COGS to net sales ratio was \*\*\* percent in 1992, \*\*\* percent in 1999, \*\*\* percent in 2005, \*\*\* percent in 2010, \*\*\* percent in 2015, and \*\*\* percent in 2021. *Id.*

domestic like product to a significant degree. Given the substitutability between the domestic like product and subject imports and the importance of price to purchasers, significant volumes of low-priced subject imports would likely capture sales and market share from the domestic industry and/or force domestic producers to lower their prices to maintain their sales, or forgo price increases, thereby depressing or suppressing prices for the domestic like product to a significant degree. Consequently, subject imports would likely have a significant impact on the production, shipments, sales, market share, and revenue of the domestic industry. These declines would likely impact the domestic industry's profitability and employment, as well as its ability to raise capital and make and maintain necessary capital investments.

We have also considered the role of factors other than subject imports in the U.S. market, including the presence of nonsubject imports. Although nonsubject imports increased their presence in the U.S. market since the last review, accounting for \*\*\* percent of apparent U.S. consumption in 2021, the record provides no indication that the presence of nonsubject imports would prevent subject imports from entering the U.S. market in significant volumes or underselling the domestic like product upon revocation of the order.<sup>179</sup> Given that the domestic industry supplied \*\*\* percent of apparent U.S. consumption in 2021, the substitutability between the subject merchandise and the domestic like product, and the importance of price in purchasing decisions, we find it likely that the increase in low-priced subject imports would come at least in part at the expense of the domestic industry and/or depress or suppress prices for the domestic like product.<sup>180</sup>

In sum, we conclude that if the antidumping duty order on SSWR from India were revoked, subject imports would likely have a significant impact on the domestic industry within a reasonably foreseeable time.

#### **IV. Conclusion**

For the above reasons, we determine that revocation of the antidumping duty order on SSWR from India would likely lead to continuation or recurrence of material injury to an industry in the United States within a reasonably foreseeable time.

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<sup>179</sup> CR/PR at Table I-8. Nonsubject imports' share of apparent U.S. consumption may be understated because official import statistics do not distinguish between imports of SSWR from subject and nonsubject sources in India. *Id.* at I-21.

<sup>180</sup> CR/PR at Table I-8.



# Information obtained in this review

## Background

On May 2, 2022, the U.S. International Trade Commission (“Commission”) gave notice, pursuant to section 751(c) of the Tariff Act of 1930, as amended (“the Act”),<sup>1</sup> that it had instituted a review to determine whether revocation of antidumping duty order on stainless steel wire rod (“SSWR”) from India would likely lead to the continuation or recurrence of material injury to a domestic industry.<sup>2</sup> All interested parties were requested to respond to this notice by submitting certain information requested by the Commission.<sup>3 4</sup> Table I-1 presents information relating to the background and schedule of this proceeding:

**Table I-1**  
**SSWR: Information relating to the background and schedule of this proceeding**

Effective date	Action
May 2, 2022	Notice of initiation by Commerce (87 FR 25617, May 2, 2022)
May 2, 2022	Notice of institution by Commission (87 FR 25671, May 2, 2022)
August 5, 2022	Commission’s vote on adequacy
August 30, 2022	Commerce’s results of its expedited review
December 28, 2022	Commission’s statutory deadline to complete expedited review
April 27, 2023	Commission’s statutory deadline to complete full review

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<sup>1</sup> 19 U.S.C. 1675(c).

<sup>2</sup> 87 FR 25671, May 2, 2022. In accordance with section 751(c) of the Act, the U.S. Department of Commerce (“Commerce”) published a notice of initiation of a five-year review of the subject antidumping duty order. 87 FR 25617, May 2, 2022. Pertinent Federal Register notices are referenced in app. A, and may be found at the Commission’s website ([www.usitc.gov](http://www.usitc.gov)).

<sup>3</sup> As part of their response to the notice of institution, interested parties were requested to provide company-specific information. That information is presented in app. B. Summary data compiled in the original investigations and subsequent full reviews are presented in app. C.

<sup>4</sup> Interested parties were also requested to provide a list of three to five leading purchasers in the U.S. market for the domestic like product and the subject merchandise. Presented in app. D are the responses received from purchaser surveys transmitted to the purchasers identified in this proceeding.

## Responses to the Commission’s notice of institution

### Individual responses

The Commission received one submission in response to its notice of institution in the subject review. It was filed on behalf of the following entities:

1. Carpenter Technology Corporation (“Carpenter”), North American Stainless (“NAS”), and Universal Stainless & Alloy Products, Inc. (“Universal”), domestic producers of SSWR (collectively referred to herein as “domestic interested parties”).

A complete response to the Commission’s notice of institution requires that the responding interested party submit to the Commission all the information listed in the notice. Responding firms are given an opportunity to remedy and explain any deficiencies in their responses. A summary of the number of responses and estimates of coverage for each is shown in table I-2.

**Table I-2**  
**SSWR: Summary of completed responses to the Commission’s notice of institution**

Interested party	Type	Number of firms	Coverage
U.S. producer	Domestic	3	***%

Note: The U.S. producer coverage figure presented is the domestic interested parties’ estimate of their share of total U.S. production of SSWR during 2021. Domestic interested parties’ response to the notice of institution, June 1, 2022, p. 24.

### Party comments on adequacy

The Commission received party comments on the adequacy of responses to the notice of institution and whether the Commission should conduct an expedited or full review from the domestic interested parties. The domestic interested parties request that the Commission conduct an expedited review of the antidumping duty order on SSWR.<sup>5</sup>

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<sup>5</sup> Domestic interested parties’ comments on adequacy, July 14, 2022, p. 3.

## **The original investigations and subsequent reviews**

### **The original investigations**

The original investigations resulted from petitions filed on December 30, 1992, with Commerce and the Commission by AL Tech Specialty Steel Corp., Armco Stainless & Alloy Products, Inc., Carpenter Technology Corp., Republic Engineered Steels, Inc., Talley Metals Technology, Inc., and the United Steelworkers of America, AFL-CIO/CLC alleging that an industry in the United States was materially injured by reason of less-than-fair value (“LTFV”) imports of SSWR from Brazil, France, and India.<sup>6</sup> On October 13, 1993, Commerce determined that imports of SSWR from India were being sold at less than fair value (“LTFV”).<sup>7</sup> The Commission notified Commerce of its final injury determination on November 23, 1993.<sup>8</sup> On December 1, 1993, Commerce issued its antidumping duty order on imports of SSWR from India with the final weighted-average dumping margin of 48.80 percent.<sup>9</sup>

### **The first five-year reviews**

On October 1, 1999, the Commission determined that it would conduct full reviews of the 1983 transition countervailing duty order on SSWR from Spain and the 1993-94 transition antidumping duty orders on SSWR from Brazil, France, and India.<sup>10</sup> On May 10, 2000, Commerce determined that revocation of the antidumping order on SSWR from India would be likely to lead to continuation or recurrence of dumping.<sup>11</sup> On July 17, 2000, the Commission determined that material injury would be likely to continue or recur within a reasonably

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<sup>6</sup> Stainless Steel Wire Rod from India, Inv. No. 731-TA-638 (Final), USITC Publication 2704, November 1993 (“Original publication”), p. I-1.

<sup>7</sup> 58 FR 54110, October 20, 1993. Commerce postponed its final determinations for Brazil and France from October 11, 1993, to December 20, 1993. 58 FR 44660, August 24, 1993.

<sup>8</sup> Original publication, p. I-1.

<sup>9</sup> 58 FR 63335, December 1, 1993. Commerce issued antidumping duty orders on imports of SSWR from Brazil and France on January 28, 1994. 59 FR 4021 and 59 FR 4022, January 28, 1994.

<sup>10</sup> 64 FR 55962, October 1, 1999.

<sup>11</sup> 65 FR 31302, May 17, 2000.

foreseeable time with respect to SSWR from Brazil, France and India.<sup>12 13</sup> Following affirmative determinations in the five-year reviews by Commerce and the Commission, effective August 2, 2000, Commerce issued a continuation of the antidumping duty orders on imports of SSWR from Brazil, France and India.<sup>14</sup>

### **The second five-year reviews**

On October 4, 2005, the Commission determined that it would conduct full reviews of the antidumping duty orders on SSWR from Brazil, France, and India.<sup>15</sup> In July 2006, the Commission determined that revocation of the antidumping duty order on SSWR from India would be likely to lead to continuation or recurrence of material injury, and that revocation of the antidumping duty orders on SSWR from Brazil and France would not be likely to lead to continuation or recurrence of material injury.<sup>16</sup> Following affirmative determinations in the five-year review by Commerce and the Commission, effective August 8, 2006, Commerce issued a continuation of the antidumping duty order on imports of SSWR from India.<sup>17</sup>

### **The third five-year review**

On October 4, 2011, the Commission determined that it would conduct an expedited review of the antidumping duty order on SSWR from India.<sup>18</sup> On November 2, 2011, Commerce determined that revocation of the antidumping duty order on SSWR from India would be likely to lead to continuation or recurrence of dumping.<sup>19</sup> On January 4, 2012, the Commission determined that revocation of the order would be likely to result in the continuation or recurrence of material injury.<sup>20</sup> Following affirmative determinations in the five-year review by

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<sup>12</sup> Commissioners Koplan and Okun dissenting with respect to SSWR from France, and Commissioner Askey dissenting with respect to SSWR from Brazil, France, and India. The Commission issued a unanimous negative determination with respect to SSWR from Spain. 65 FR 45409, July 21, 2000.

<sup>13</sup> The French respondent interested parties appealed the Commission's determination with respect to France in the first five-year reviews of the orders under review. Judge Richard Goldberg of the U.S. Court of International Trade affirmed the Commission's determinations with respect to likely volume, price, and impact and Commissioner Bragg's determination to cumulate the subject imports. *See Ugine-Savoie Imphy v. United States*, 248 F. Supp.2d 1208 (Ct. Int'l Trade 2002).

<sup>14</sup> 65 FR 47403, August 2, 2000.

<sup>15</sup> 70 FR 60109, October 14, 2005.

<sup>16</sup> 71 FR 42118, July 25, 2006.

<sup>17</sup> 71 FR 45023, August 8, 2006.

<sup>18</sup> 76 FR 64105, October 17, 2011.

<sup>19</sup> 76 FR 67672, November 2, 2011.

<sup>20</sup> 77 FR 1504, January 10, 2012.

Commerce and the Commission, effective January 23, 2012, Commerce issued a continuation of the antidumping order on imports of SSWR from India.<sup>21</sup>

### **The fourth five-year review**

On March 6, 2017, the Commission determined that it would conduct an expedited review of the antidumping duty order on SSWR from India.<sup>22</sup> On April 6, 2017, Commerce determined that revocation of the antidumping duty order on SSWR from India would be likely to lead to continuation or recurrence of dumping.<sup>23</sup> On June 6, 2017, the Commission determined that revocation of the order would be likely to result in the continuation or recurrence of material injury.<sup>24</sup> Following affirmative determinations in the five-year review by Commerce and the Commission, effective June 23, 2017, Commerce issued a continuation of the antidumping duty order on imports of SSWR from India.<sup>25</sup>

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<sup>21</sup> 77 FR 3231, January 23, 2012. Effective August 2, 2005, Commerce revoked the antidumping duty orders on SSWR from Brazil and France. 71 FR 45030 August 8, 2006.

<sup>22</sup> 82 FR 16231, April 3, 2017.

<sup>23</sup> 82 FR 16795, April 6, 2017.

<sup>24</sup> 82 FR 26943, June 12, 2017.

<sup>25</sup> 82 FR 28640, June 23, 2017.

## Previous and related investigations

The Commission has conducted a number of previous import relief investigations on SSWR and similar merchandise. Table I-3 presents data on previous title VII investigations regarding SSWR and table I-4 presents data on related title VII investigations regarding stainless steel wire (“SS wire”) and stainless steel bar (“SS bar”).

**Table I-3**  
**SSWR: Previous Commission proceedings and status of orders**

Date	Number(s)	Countr(ies)	Determination	Current Status of Order(s)
1982	701-TA-178	Spain	Affirmative	Order revoked after first review January 1, 2000
1992	731-TA-636- 637	Brazil and France	Affirmative	Order revoked after second review July 1, 2006
1997	731-TA-771-772 and 775	Japan, Korea, and Taiwan	Affirmative	Order continued after fourth review, May 5, 2022
1997	731-TA-769	Germany	Negative	-
1997	701-TA-373 and 731-TA-770 and 773	Italy and Spain	Affirmative	Order revoked after third review, July 17, 2015
1997	731-TA-775	Sweden	Affirmative	Order revoked after first review, April 23, 2007

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

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

**Table I-4****SS bar and SS wire: Related Commission proceedings and status of orders**

<b>Date</b>	<b>Product</b>	<b>Number(s)</b>	<b>Countr(ies)</b>	<b>Determination(s)</b>	<b>Current Status of Order(s)</b>
1993	SS Bar	731-TA-678	Brazil	Affirmative	Order revoked after fourth review, August 9, 2017
1993	SS Bar	731-TA-679	India	Affirmative	Order continued after fourth review, August 9, 2017
1993	SS Bar	731-TA-680	Italy	Affirmative	Order revoked after fourth review, August 9, 2017
1993	SS Bar	731-TA-681	Japan	Affirmative	Order revoked after fourth review, August 9, 2017
1993	SS Bar	731-TA-682	Spain		Order revoked after fourth review, August 9, 2017
1998	SS Wire	731-TA-781	Canada	Negative	-
1998	SS Wire	731-TA-782	India	Negative	-
1998	SS Wire	731-TA-783	Japan	Negative	-
1998	SS Wire	731-TA-784	Korea	Negative	-
1998	SS Wire	731-TA-785	Spain	Negative	-
1998	SS Wire	731-TA-786	Taiwan	Negative	-
2000	SS Bar	731-TA-913	France	Affirmative	Order revoked after first review, March 7, 2007
2000	SS Bar	731-TA-914	Germany	Affirmative	Order revoked after first review, March 7, 2007
2000	SS Bar	701-TA-413 731-TA-915	Italy	Affirmative	Order revoked after first review, March 8, 2007 and March 8, 2007
2000	SS Bar	731-TA-916	Korea	Affirmative	Order revoked after first review, March 7, 2007
2000	SS Bar	731-TA-917	Taiwan	Negative	-
2000	SS Bar	731-TA-918	United Kingdom	Affirmative	Order revoked after first review, March 7, 2007

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

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

## Safeguard investigations<sup>26</sup>

During 1982-83, the Commission conducted a safeguard investigation of stainless steel products (Inv. No. TA-201-48) that included SSWR. Following affirmative determinations of serious injury and remedy recommendations by the Commission, President Reagan proclaimed four-year global quotas limiting SSWR imports to 19,100 tons in the first year; and increasing to 19,700 tons, 20,300 tons, and 20,900 tons in subsequent years. In 2001, the Commission conducted a safeguard investigation of steel products (Inv. No. TA-201-73) that included SSWR (as well as downstream products such as SS bar and SS wire). Following affirmative determinations of serious injury and remedy recommendations by the Commission, President Bush issued a proclamation on March 5, 2002, imposing temporary import relief for a period not to exceed three years and one day. Import relief relating to SSWR consisted of an additional tariff of 15 percent ad valorem on imports in the first year, 12 percent in the second year, and 9 percent in the third year. Following receipt of the Commission's mid-term monitoring report in September 2003, and after seeking information from the U.S. Secretary of Commerce and U.S. Secretary of Labor, President Bush determined that the effectiveness of the action taken had been impaired by changed circumstances. Therefore, he terminated the U.S. measure with respect to increased tariffs on December 4, 2003.<sup>27</sup>

## Section 337 investigation

On September 5, 2014, Valbruna Slater Stainless, Inc., et. al. ("Valbruna") filed a complaint against several respondents that alleged violations of section 337 of the Tariff Act of 1930, as amended, 19 U.S.C. § 1337, in the importation into the United States, the sale for importation, and the sale within the United States after importation of certain stainless steel products, certain processes for manufacturing or relating to same, and certain products containing same by reason of the misappropriation of trade secrets, the threat or effect of which is to destroy or substantially injure an industry in the United States.<sup>28</sup> On December 8,

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<sup>26</sup> *Stainless Steel Wire Rod from Italy, Japan, Korea, Spain, and Taiwan, Investigation Nos. 731-TA-770-773 and 775 (Second Review)*, USITC Publication 4154, May 2010, p. I-5.

<sup>27</sup> *Presidential Proclamation 7741 of December 4, 2003, To Provide for the Termination of Action Taken With Regard to Imports of Certain Steel Products*, 68 FR 68483, December 8, 2003. Import licensing, however, remained in place through March 21, 2005, and continues in modified form at this time.

<sup>28</sup> *Certain Stainless Steel Products, Certain Processes for Manufacturing or Relating to Same and Certain Products Containing Same (337-TA-933)*; Complaint, pp. 18-19, September 5, 2014.



2015, an initial determination was issued finding respondent Viraj Profiles Limited (“Viraj”), an Indian producer of stainless steel bar was in default for spoliation of evidence.<sup>29</sup> The Commission upheld the ALJ’s initial determination, finding a violation of Section 337 as to Viraj<sup>30</sup> and issuing a limited exclusion order with regard to stainless steel products using Valbruna’s trade secrets imported by Viraj or its affiliated companies, parents, or other related business entities for a period of 16.7 years.<sup>31</sup> On September 11, 2017, the U.S. Court of Appeals for the Federal Circuit issued a summary affirmance of the Commission’s determination.<sup>32</sup>

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<sup>29</sup> 337-TA-933; Order No. 17, p. 41, December 8, 2015.

<sup>30</sup> 337-TA-933; Commission Opinion, p. 56, June 9, 2016.

<sup>31</sup> 337-TA-933; Limited Exclusion Order, p. 2, May 25, 2016.

<sup>32</sup> *Viraj Profiles Ltd. v. Int’l Trade C’mmn*, Court No. 2016-2482, 2017 WL 3980535 (Fed. Cir. Sept. 11, 2017).

## Commerce's five-year review

Commerce announced that it would conduct an expedited review with respect to the order on imports of SSWR from India with the intent of issuing the final results of this review based on the facts available not later than August 30, 2022.<sup>33</sup> Commerce publishes its Issues and Decision Memoranda and its final results concurrently, accessible upon publication at <http://enforcement.trade.gov/frn/>. Issues and Decision Memoranda contain complete and up-to-date information regarding the background and history of the order, including scope rulings, duty absorption, changed circumstances reviews, and anticircumvention, as well as any decisions that may have been pending at the issuance of this report. Any foreign producers/exporters that are not currently subject to the antidumping duty order on imports of SSWR from India are noted in the sections titled "The original investigations" and "U.S. imports," if applicable.

## The product

### Commerce's scope

Commerce has defined the scope as follows:

*The merchandise covered by the antidumping duty order is certain stainless steel wire rods from India, which are hot-rolled or hot-rolled annealed and/or pickled rounds, squares, octagons, hexagons or other shapes, in coils. Wire rods are made of alloy steels containing, by weight, 1.2 percent or less of carbon and 10.5 percent or more of chromium, with or without other elements. These products are only manufactured by hot-rolling and are normally sold in coiled form, and are of solid cross section. The majority of wire rods sold in the United States are round in cross-section shape, annealed, and pickled. The most common size is 5.5 millimeters in diameter.*<sup>34</sup>

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<sup>33</sup> Letter from Robert Bolling, Acting Office Director, Office IV, AD/CVD Operations, Enforcement and Compliance, U.S. Department of Commerce to Nannette Christ, Director of Investigations, June 21, 2022.

<sup>34</sup> 82 FR 28640, June 23, 2017.

## U.S. tariff treatment

Stainless steel wire rod is currently imported under Harmonized Tariff Schedule of the United States (“HTS”) statistical reporting numbers 7221.00.0005, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075.<sup>35</sup> SSWR imported from India enters the U.S. market at a column 1-general duty rate of “free.”<sup>36</sup> Effective February 14, 2020, stainless steel wire rod produced in China (a nonsubject country in this review) is subject to an additional 7.5 percent ad valorem duty under Section 301 of the Trade Act of 1974.<sup>37</sup> Effective March 8, 2018, SSWR produced in India is subject to an additional 25 percent ad valorem duty under Section 232 of the Trade Expansion Act of 1962, as amended.<sup>38</sup>

### Section 232

Currently, U.S. imports of certain iron and steel articles originating in Australia, Canada, Mexico, and Ukraine are exempt from Section 232 duties; imports originating in Argentina, Brazil, and South Korea are exempt from Section 232 duties within annual quota limits; imports originating in European Union member countries, Japan, and the United Kingdom are subject to tariff rate quotas; and imports from all other countries are subject to 25 percent additional duties.<sup>39</sup> Decisions on the tariff classification and treatment of imported goods are within the authority of U.S. Customs and Border Protection.

### Description and uses<sup>40</sup>

Stainless steel wire rod is an intermediate stainless steel product that is used primarily to produce stainless steel wire and stainless steel bar. SSWR is a long product produced in coiled form with no specific size limitation. SSWR is produced in diameters at least as large as

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<sup>35</sup> Effective July 2016, HTS 7221.00.0015 was discontinued and replaced with 7221.00.0017 and 7221.00.0018.

<sup>36</sup> HTSUS (2022) Revision 5, USITC Publication 5319, June 2022, p. 72-35.

<sup>37</sup> Stainless steel wire rod was subject to an additional 15 percent ad valorem duty under Section 301 from September 1, 2019, until February 14, 2020. 84 FR 45821, August 30, 2019 and 85 FR 3741, January 22, 2020.

<sup>38</sup> 83 FR 11625, March 15, 2018.

<sup>39</sup> 83 FR 13361, March 28, 2018; 83 FR 20683, May 7, 2018; 83 FR 25857, June 5, 2018; 83 FR 40429, August 15, 2018; 84 FR 23987, May 23, 2019; 87 FR 11, January 3, 2022; 87 FR 19351, April 1, 2022; 87 FR 33407, June 2, 2022; and 87 FR 33591, June 3, 2022.

<sup>40</sup> Unless otherwise noted, this information is based on Stainless Steel Wire Rod from India, Investigation No. 731-TA-638 (Fourth Review), USITC Publication 4695, June 2017 (“Fourth review publication”), pp. I-3-I-4.

39 mm (1.54 inch) although the most common size is 5.5 mm (0.217 inch) circular cross-section. This is the smallest size normally produced on a hot-rolling mill and is the size most commonly used for wire drawing. SSWR may also be produced as a square, hexagon, octagon, or other shape.

Stainless steels are alloys of iron containing at least 10.5 percent by weight of chromium. In comparison to carbon steel and other alloy steels, stainless steels offer superior resistance to corrosion or oxidation at ambient or elevated temperatures. There are 5 classes of stainless steel, each having different chemical compositions and physical properties: austenitic, martensitic, ferritic, duplex, and precipitation hardenable stainless steel alloys.

Austenitic stainless steels (200- and 300-series) are nonmagnetic, chromium-nickel alloys, such as American Iron and Steel Institute (“AISI”) grades 304 and 316.<sup>41</sup> Austenitic alloys can be substantially hardened by cold working but not by heat treatment. Grade 304 is the most widely used steel of the austenitic class. It has a nominal composition of 18 percent chromium and 8 percent nickel. Martensitic stainless steels (400-series) are magnetic alloys containing chromium but little or no nickel, such as grade 410, which contains 11.5 percent chromium. Martensitic alloys are hardenable by heat treatment and are generally used in the hardened condition for applications subject to contact friction. Ferritic stainless steels (also 400-series) are magnetic, chromium alloys such as grade 430 (which contains 16 percent chromium) and type 409 (which contains 10.5 percent chromium.) Grade 409 stainless steel wire rod is commonly used to produce wire for exhaust-system hangers. Grade 430 is a general-purpose grade that is less resistant to corrosion than the austenitic grades and is therefore used in applications that are not subject to corrosive conditions. Duplex stainless steels, such as 2205, are magnetic and not hardenable by heat treatment. Duplex stainless steels are a combination of austenitic and ferritic stainless steels with excellent corrosion resistance and have about twice the yield strength of common austenitic alloys. Grade 2205 contains 22 percent chromium, 4.5 percent nickel, and 3 percent molybdenum. Precipitation hardenable (PH) stainless steels combine high strength and hardness with corrosion resistance that is superior to that of the martensitic alloys. Alloy 17-7 PH is a typical PH alloy and contains 16 percent chromium, 6.5 percent nickel, and about 1 percent aluminum. The essential characteristics imparted by physical structures and chemical compositions influence how the steel is melted, as well as its ladle treatment, hot-rolling, and heat treatment.

There are three basic applications for SSWR; drawn wire, fasteners or cutlery, and conversion to bars. Bars with a diameter between 5 and 20 mm are usually manufactured by

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<sup>41</sup> The “grade” of stainless steel refers to the properties associated with its composition such as quality, durability and temperature resistance.

straightening hot rolled, annealed and pickled wire rod. The primary use for SSWR shipped in the domestic market is for the production of wire which is then used to produce downstream products such as industrial fasteners, springs, medical and dental instruments, automotive parts, couplings, and welding electrodes.

## **Manufacturing process<sup>42</sup>**

There are three basic steps involved in SSWR production, regardless of grade or final cross section: (1)the melting of steel and production of stainless steel billets, (2)hot-rolling the billets and coiling the wire rod, and (3)finishing, which includes annealing and pickling.

Inspection, packaging, and shipment follow these three stages of production. The production process employed by U.S. producers and by foreign manufacturers is generally the same.

In the first stage, molten stainless steel is produced by melting stainless steel scrap and other raw materials (including chromium, nickel, and molybdenum)in an electric-arc furnace. Molten stainless steel typically is transferred to an argon-oxygen refining vessel, where its chemistry is refined and adjusted through further additions to produce steel with the required chemical composition. The steel is then processed through a continuous casting machine to produce billets, which are semifinished long products with a square cross section. Other types of melting equipment, such as a vacuum furnace or an electroslag remelting furnace, may be used to produce special quality stainless steel wire rod, but these processes are uncommon. When continuous casting is not used, billets may be produced from ingots by rolling or forging.

In the second stage, the surface of the billets may be ground to remove defects, following which the billets are heated to rolling temperature (about 2,200 degrees Fahrenheit) prior to hot rolling. In the hot-rolling mill, the billet passes through a series of rolling operations until it has been reduced to its final diameter or shape, at which point it has the dimensions of wire rod. The wire rod is coiled and then is cooled either by forced air or by water-quenching. Each billet yields a single coil of wire rod.

In the finishing stage, the coils may be annealed (heat-treated)and mechanically descaled (shot-blasted)and/or pickled (dipped in a series of acid baths)to improve surface quality. The coils of wire rod may also be coated with a lubricant containing copper, lime, or oxalate, which facilitates the drawing process.

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<sup>42</sup> Unless otherwise noted, this information is based on fourth review publication, pp. I-14.

## The industry in the United States

### U.S. producers

During the final phase of the original investigations, the Commission received U.S. producer questionnaires from seven firms, which accounted for all known production of SSWR in the United States during January 1990 through June 1993.<sup>43</sup> During the first full five-year reviews, the Commission received U.S. producer questionnaires from five firms, which accounted for all production of SSWR in the United States during 1999.<sup>44</sup> During the second full five-year reviews, the Commission received U.S. producer questionnaires from six firms, which accounted for more than \*\*\* percent of production of SSWR in the United States during 2005.<sup>45</sup>

During the expedited third five-year review, the domestic interested parties provided a list of five known and currently operating U.S. producers of SSWR. Two responding firms accounted for approximately \*\*\* percent of production of SSWR in the United States during 2010.<sup>46</sup> During the fourth expedited five-year review, the domestic interested parties provided a list of five known and currently operating U.S. producers of SSWR. Three responding firms accounted for over \*\*\* percent of production of SSWR in the United States during 2015.<sup>47</sup>

In response to the Commission's notice of institution in this current review, the domestic interested parties provided a list of five known and currently operating U.S. producers of SSWR.<sup>48</sup> Three responding firms, which provided U.S. industry data in response to the

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<sup>43</sup> Investigation Nos. 731-TA-636-638 (Final): Stainless Steel Wire Rod from Brazil, France, and India, Confidential Report, INV-Q-182, November 9, 1993, as supplemented in INV-R-005, January 7, 1994, ("Original confidential report"), p. I-11.

<sup>44</sup> Stainless Steel Wire Rod from Brazil, France, India, and Spain, Investigation nos. 701-TA-178 and 731-TA-636-638 (First Review), USITC Publication 3321, July 2000 ("First review publication"), p. I-13.

<sup>45</sup> Investigation Nos. 731-TA-636-638 (Second Review): Stainless Steel Wire Rod from Brazil, France, and India, Confidential Report, INV-DD-085, June 13, 2006, as revised in INV-DD-089, June 16, 2006, and INV-DD-094, June 22, 2006, ("Second review confidential report"), p. III-1.

<sup>46</sup> Investigation No. 731-TA-638 (Third Review): Stainless Steel Wire Rod from India, Confidential Report, INV-JJ-118, November 10, 2011, as revised in INV-JJ-128, December 14, 2011, ("Third review confidential report"), pp. I-15-I-16.

<sup>47</sup> Investigation No. 731-TA-638 (Fourth Review): Stainless Steel Wire Rod from India, Confidential Report, INV-PP-023, February 22, 2017, ("Fourth review confidential report"), p. I-17

<sup>48</sup> The domestic interested parties identified no domestic producers that qualify as related parties or imported subject merchandise.

Commission’s notice of institution accounted for approximately \*\*\* percent of production of SSWR in the United States during 2021.<sup>49</sup>

## Recent developments

Table I-5 presents events in the U.S. industry since the last five-year review.<sup>50</sup>

**Table I-5**  
**Stainless steel wire rod: Recent developments in the U.S. industry**

Item	Firm	Event
Market demand	U.S. market	Demand for stainless steel wire rod decreased in 2020, reflecting the negative impact of the COVID-19 pandemic. There was a slight increase in 2021 reflecting the subsequent economic recovery.

Source: Domestic interested parties’ response to the notice of institution, June 1, 2022, p. 25.

## U.S. producers’ trade and financial data

The Commission asked domestic interested parties to provide trade and financial data in their response to the notice of institution in the current five-year review.<sup>51</sup> Table I-6 presents a compilation of the trade and financial data submitted from all responding U.S. producers in the original investigations and subsequent five-year reviews.

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<sup>49</sup> Domestic interested parties’ response to the notice of institution, June 1, 2022, p. 24.

<sup>50</sup> For recent developments, if any, in tariff treatment (including Section 232 and 301 tariffs), please see “U.S. tariff treatment” section.

<sup>51</sup> Individual company trade and financial data are presented in app. B.

**Table I-6**  
**SSWR: Trade and financial data submitted by U.S. producers, by period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short ton; ratio is in percent

Item	Measure	1992	1999	2005	2010	2015	2021
Capacity	Quantity	249,894	***	***	***	***	***
Production	Quantity	89,574	***	***	***	***	***
Capacity utilization	Ratio	35.8	***	***	***	***	***
U.S. shipments	Quantity	89,421	***	***	***	***	***
U.S. shipments	Value	257,237	***	***	***	***	***
U.S. shipments	Unit value	2,877	***	***	***	***	***
Net sales	Value	252,014	***	***	***	***	***
COGS	Value	246,815	***	***	***	***	***
COGS to net sales	Ratio	97.9	***	***	***	***	***
Gross profit or (loss)	Value	5,199	***	***	***	***	***
SG&A expenses	Value	20,239	***	***	***	***	***
Operating income or (loss)	Value	(15,040)	***	***	***	***	***
Operating income or (loss) to net sales	Ratio	(6.0)	***	***	***	***	***

Source: For the years 1992-2015, data are compiled using data submitted in the Commission's original investigations and five-year reviews. For the year 2021, data are compiled using data submitted by the domestic interested parties. Domestic interested parties' response to the notice of institution, June 2, 2022, exh. 5.

Note: For a discussion of data coverage, please see "U.S. producers" section. Additionally, \*\*\* did not report its internal consumption of SSWR for its downstream products, while its net sales value exceeds its U.S. shipments value (fiscal year ending December 31, 2021).

## Definitions of the domestic like product and domestic industry

The domestic like product is defined as the domestically produced product or products which are like, or in the absence of like, most similar in characteristics and uses with, the subject merchandise. The domestic industry is defined as the U.S. producers as a whole of the domestic like product, or those producers whose collective output of the domestic like product constitutes a major proportion of the total domestic production of the product. Under the related parties provision, the Commission may exclude a U.S. producer from the domestic industry for purposes of its injury determination if "appropriate circumstances" exist.<sup>52</sup>

In its original determinations and subsequent reviews, the Commission defined the domestic like product as all SSWR coextensive with Commerce's scope.<sup>53</sup> Consequently, the

<sup>52</sup> Section 771(4)(B) of the Tariff Act of 1930, 19 U.S.C. § 1677(4)(B).

<sup>53</sup> 87 FR 25671, May 2, 2022.



Commission defined the domestic industry in the prior proceedings as all domestic producers of SSWR.<sup>54</sup>

## **U.S. imports**

### **U.S. importers**

During the final phase of the original investigations, the Commission received U.S. importer questionnaires from five firms, which accounted for the majority of total U.S. imports of SSWR from India during January 1990 to June 1993.<sup>55</sup> Import data presented in the original investigations were based on official Commerce statistics.

During the first five-year reviews, the Commission received U.S. importer questionnaires from nine firms, two which reported imports of SSWR from India accounting for 35.0 percent of total U.S. imports of SSWR during 1999.<sup>56</sup> Import data presented in the first reviews were based on official Commerce statistics.

During the second five-year reviews, the Commission received U.S. importer questionnaires from four firms (there were no importers of SSWR from India), accounting for more than 25.0 percent of total SSWR imports during 2005.<sup>57</sup> Import data presented in the second reviews were based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its third five-year review, the domestic interested parties provided a list of six firms that may have imported SSWR from India.<sup>58</sup> Import data presented in the third review were based on official Commerce statistics.

Although the Commission did not receive responses from any respondent interested parties in its fourth five-year review, the domestic interested parties provided a list of seven firms that may have imported SSWR from India.<sup>59</sup> Import data presented in the fourth review were based on official Commerce statistics.

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<sup>54</sup> Ibid.

<sup>55</sup> Original confidential report, pp. I-11-12.

<sup>56</sup> Investigation Nos. 701-TA-138 and 731-TA-636-638 (Review): Stainless Steel Wire Rod from Brazil, France, India, and Spain Confidential Report, INV-X-133, June 16, 2000, as revised in INV-X-137, June 21, 2000, (“First review confidential report”), p. I-20.

<sup>57</sup> Second review confidential report, p. IV-1.

<sup>58</sup> Stainless Steel Wire Rod from India, Investigation no. 731-TA-638 (Third Review), USITC Publication 4300, July 2012 (“Third review publication”), p. I-13.

<sup>59</sup> Fourth review publication, p. I-13.

Although the Commission did not receive responses from any respondent interested parties in the current review, in their response to the Commission's notice of institution, the domestic interested parties provided a list of nine potential U.S. importers of SSWR.<sup>60</sup>

## **U.S. imports**

Table I-7 presents the quantity, value, and unit value of U.S. imports from India as well as the other top sources of U.S. imports (shown in descending order of 2021 imports by quantity).

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<sup>60</sup> Domestic interested parties' response to the notice of institution, June 1, 2022, pp. 19-20.

**Table I-7**  
**SSWR: U.S. imports, by source and period**

Quantity in short tons; value in 1,000 dollars; unit value in dollars per short tons

U.S. imports from	Measure	2016	2017	2018	2019	2020	2021
India <sup>1</sup>	Quantity	1,174	19	37	1	4	314
China	Quantity	7,781	8,985	9,039	9,604	4,366	13,393
Taiwan	Quantity	8,410	8,413	9,815	6,843	7,752	7,380
United Kingdom	Quantity	5,462	6,050	5,272	4,607	3,443	6,637
All other sources	Quantity	10,734	18,822	17,633	15,502	14,353	18,844
Nonsubject sources	Quantity	32,388	42,269	41,759	36,556	29,914	46,254
All import sources	Quantity	33,562	42,287	41,796	36,557	29,918	46,569
India (subject)	Value	1,975	28	108	6	32	1,244
China	Value	12,919	15,535	21,026	24,072	9,737	40,604
Taiwan	Value	17,670	19,470	29,803	20,256	21,072	25,469
United Kingdom	Value	15,682	19,151	20,912	17,629	12,318	28,278
All other sources	Value	36,490	65,380	84,490	66,823	58,745	84,733
Nonsubject sources	Value	82,761	119,536	156,231	128,780	101,872	179,085
All import sources	Value	84,736	119,564	156,339	128,786	101,904	180,329
India (subject)	Unit value	1,682.2	1,505	2,907	6,709	7,561	3,958
China	Unit value	1,660	1,729	2,326	2,506	2,230	3,032
Taiwan	Unit value	2,101	2,314	3,037	2,960	2,718	3,451
United Kingdom	Unit value	2,871	3,166	3,966	3,827	3,577	4,261
All other sources	Unit value	3,399	3,474	4,791	4,311	4,093	4,497
Nonsubject sources	Unit value	2,555	2,828	3,741	3,523	3,406	3,872
All import sources	Unit value	2,525	2,827	3,741	3,523	3,406	3,872

Source: Compiled from official Commerce statistics for HTS statistical reporting numbers 7221.00.0005, 7221.00.0015, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075, accessed June 22, 2022.

<sup>1</sup> These data may be overstated as HTS statistical reporting numbers 7221.00.0005, 7221.00.0015, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075 may contain imports from a producer/exporter in India excluded from the order. Commerce revoked the antidumping duty order on SSWR manufactured and exported by the Viraj Group and terminated suspension of liquidation for entries on or after December 1, 2003. Imports from India do not distinguish between subject and nonsubject sources.

Note: Because of rounding, figure may not add to total shown.

## Apparent U.S. consumption and market shares

Table I-8 presents data on U.S. producers' U.S. shipments, U.S. imports, apparent U.S. consumption, and market shares.

**Table I-8**  
**SSWR: Apparent U.S. consumption and market shares, by source and period**

Quantity in short tons; value in 1,000 dollars; shares in percent

Source	Measure	1992	1999	2005	2010	2015	2021
U.S. producers	Quantity	89,421	***	***	***	***	***
India (subject)	Quantity	4,344	***	***	***	***	314
India (nonsubject)	Quantity	0	***	***	***	***	0
All other	Quantity	37,756	***	***	***	***	46,254
All import sources	Quantity	42,100	***	***	***	***	46,569
Apparent U.S. consumption	Quantity	131,521	***	***	***	***	***
U.S. producers	Value	257,237	***	***	***	***	***
India (subject)	Value	7,961	***	***	***	***	1,244
India (nonsubject)	Value	0	***	***	***	***	0
All other	Value	85,577	***	***	***	***	179,085
All import sources	Value	94,538	***	***	***	***	180,329
Apparent U.S. consumption	Value	351,775	***	***	***	***	***
U.S. producers	Share of quantity	68.0	***	***	***	***	***
India (subject)	Share of quantity	3.3	***	***	***	***	***
India (nonsubject)	Share of quantity	0	***	***	***	***	***
All other	Share of quantity	28.7	***	***	***	***	***
All import sources	Share of quantity	32.0	***	***	***	***	***
U.S. producers	Share of value	73.1	***	***	***	***	***
India (subject)	Share of value	2.3	***	***	***	***	***
India (nonsubject)	Share of value	0	***	***	***	***	***
All other	Share of value	24.6	***	***	***	***	***
All import sources	Share of value	26.9	***	***	***	***	***

Notes continued.

## Table I-8 Continued

### SSWR: Apparent U.S. consumption and market shares, by source and period

Source: For the years 1992-2015, data are compiled using data submitted in the Commission's original investigations and subsequent five-year reviews. For the year 2021, U.S. producers' U.S. shipments are compiled from the domestic interested parties' response to the Commission's notice of institution and U.S. imports are compiled using official Commerce statistics under HTS statistical reporting numbers 7221.00.0005, 7221.00.0015, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075, accessed June 22, 2022. These data may be overstated as HTS statistical reporting numbers 7221.00.0005, 7221.00.0015, 7221.00.0017, 7221.00.0018, 7221.00.0030, 7221.00.0045, and 7221.00.0075 may contain imports from a producer/exporter in India excluded from the order. Commerce revoked the antidumping duty order on SSWR manufactured and exported by the Viraj Group and terminated suspension of liquidation for entries on or after December 1, 2003. Imports from India do not distinguish between subject and nonsubject sources.

Note: Share of quantity is the share of apparent U.S. consumption by quantity in percent; share of value is the share of apparent U.S. consumption by value in percent.

Note: For a discussion of data coverage, please see "U.S. producers" and "U.S. importers" sections.

## The industry in India

During the final phase of the original investigations, the Commission received a foreign producer/exporter questionnaire from one Indian producer/exporter, accounting for approximately 45 percent of production of SSWR in India during 1992.<sup>61</sup> During the first five-year reviews, the Commission received foreign producer/exporter questionnaires from four Indian producers/exporters, which accounted for the majority of production of SSWR in India during 1999.<sup>62</sup>

Although the Commission did not receive questionnaire responses from any Indian producers/exporters in its second five-year reviews, the domestic interested parties provided a list of 16 possible producers of SSWR in India in that proceeding.<sup>63</sup>

Although the Commission did not receive responses from any respondent interested parties in its third five-year review, the domestic interested party provided a list of 16 possible producers of SSWR in India in that proceeding.<sup>64</sup>

Although the Commission did not receive responses from any respondent interested parties in its fourth five-year review, the domestic interested parties provided a list of 20 possible producers of SSWR in India in that proceeding.<sup>65</sup>

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<sup>61</sup> Original publication, p. II-22.

<sup>62</sup> First review confidential report, pp. IV-10-13.

<sup>63</sup> Second review confidential report, p. IV-16.

<sup>64</sup> Third review publication, p. I-23.

<sup>65</sup> Fourth review publication, p. I-16.

Although the Commission did not receive responses from any respondent interested parties in this five-year review, the domestic interested parties provided a list of 13 possible producers of SSWR in India.<sup>66</sup>

Table I-9 presents events in India’s industry since the last five-year review.

**Table I-9**  
**Stainless steel wire rod: Recent developments in India’s industry**

Item	Firm	Event
Expansion	Mukand Limited	In June 2021, Mukand announced an increase in stainless steel production from 100,000 mt to 150,000 mt.

Source: SteelOrbis, “India’s Mukand Limited to increase stainless steel production,” June 29, 2021, <https://www.steelorbis.com/steel-news/latest-news/indias-mukand-limited-to-increase-stainless-steel-production-1205876.htm>.

Table I-10 presents export data for bars and rods of stainless steel, hot-rolled, in irregularly wound coils, a category that includes SSWR and out-of-scope products, from India (by export destination in descending order of quantity for 2021).

**Table I-10**  
**Bars and rods of stainless steel, hot-rolled, in irregularly wound coils: Short tons of exports from India, by destination and period**

Quantity in short tons

Destination market	2016	2017	2018	2019	2020	2021
Italy	23,136	15,212	10,786	8,323	12,205	16,353
Germany	1,488	2,669	4,440	6,150	6,548	9,499
United Arab Emirates	1,825	3,064	3,641	2,139	4,352	8,968
Mexico	1,719	2,216	1,849	1,165	1,587	3,591
Finland	2,598	3,478	2,098	2,105	2,485	3,283
Brazil	2,174	3,557	3,661	3,934	4,295	3,204
Belgium	3,351	4,701	3,740	4,800	3,050	3,083
Taiwan	1,377	1,381	1,462	977	1,248	2,224
Netherlands	1,230	1,606	181	381	5,801	2,058
Malaysia	1,144	1,049	670	348	1,372	1,641
All other markets	26,216	13,033	8,240	5,846	6,994	8,843
All markets	66,259	51,965	40,768	36,167	49,937	62,748

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

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheading 7221.00, accessed June 29, 2022.

<sup>66</sup> Domestic interested parties’ response to the notice of institution, June 1, 2022, pp. 20-23.

## Third-country trade actions

Based on available information, SSWR from India has not been subject to other antidumping or countervailing duty investigations outside the United States.

## The global market

India was the seventh largest global exporter of SSWR in 2021, by quantity. China was the largest exporter in terms of quantity (accounting for 24.1 percent of global exports in 2021) followed by Taiwan (accounting for 14.6 percent)

Table I-10 presents global export data for bars and rods of stainless steel, hot-rolled, in irregularly wound coils, a category that includes SSWR and out-of-scope products, (by source in descending order of quantity for 2021)

**Table I-10**  
**Bars and rods of stainless steel, hot-rolled, in irregularly wound coils: Short tons of global exports by country and period**

Quantity in short tons

Exporting country	2016	2017	2018	2019	2020	2021
China	93,722	89,210	130,986	131,989	123,439	203,640
Taiwan	156,972	186,396	165,122	144,710	128,653	123,687
Italy	80,508	89,548	83,008	80,290	61,652	84,969
Japan	84,510	102,686	82,266	81,781	69,832	79,353
France	80,968	81,796	75,167	68,071	62,165	78,991
Spain	56,952	66,909	67,602	56,801	53,390	69,327
India	66,259	51,965	40,768	36,167	49,937	62,748
South Korea	59,986	74,676	81,545	67,074	58,683	59,068
Sweden	35,704	39,383	40,201	35,380	34,052	41,027
United Kingdom	19,238	19,939	16,398	13,759	10,886	14,823
All other exporters	213,816	48,685	71,710	22,300	20,383	27,395
All exporters	948,636	851,193	854,772	738,321	673,072	845,028

Source: Global Trade Information Services, Inc., Global Trade Atlas, HS subheadings 7221.00, accessed June 29, 2022.

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





**APPENDIX A**  
**FEDERAL REGISTER NOTICES**



The Commission makes available notices relevant to its investigations and reviews on its website, [www.usitc.gov](http://www.usitc.gov). In addition, the following tabulation presents, in chronological order, Federal Register notices issued by the Commission and Commerce during the current proceeding.

Citation	Title	Link
87 FR 25617, May 2, 2022	<i>Initiation of Five-Year (Sunset) Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-09366.pdf">https://www.govinfo.gov/content/pkg/FR-2022-05-02/pdf/2022-09366.pdf</a>
87 FR 25671, May 2, 2022	<i>Stainless Steel Wire Rod From India; Institution of a Five-Year Reviews</i>	<a href="https://www.govinfo.gov/content/pkg/FR-2022-05-02/html/2022-09257.htm">https://www.govinfo.gov/content/pkg/FR-2022-05-02/html/2022-09257.htm</a>



**APPENDIX B**  
**COMPANY-SPECIFIC DATA**



**RESPONSE CHECKLIST FOR U.S. PRODUCERS**

\* \* \* \* \*





**APPENDIX C**

**SUMMARY DATA COMPILED IN PRIOR PROCEEDINGS**



**Table I-1**  
**SSWR: Summary data from the original investigations, the first reviews, and the current reviews, 1990-92, 1997-99, and 2000-05**

(Quantity=short tons; value=1,000 dollars; unit values, unit labor costs, and unit financial data are per short ton)

Item	1990	1991	1992	1997	1998	1999	2000	2001	2002	2003	2004	2005
U.S. consumption quantity: Amount	117,926	123,855	131,521	***	***	***	***	***	***	***	***	***
Producers' share <sup>1</sup>	79.4	78.8	68.0	***	***	***	***	***	***	***	***	***
Importers' share:												
Brazil <sup>1</sup>	1.7	1.3	2.6	***	***	***	***	***	***	***	***	***
France <sup>1</sup>	3.9	4.5	8.5	***	***	***	***	***	***	***	***	***
India <sup>1</sup>	0.1	1.4	3.3	***	***	***	***	***	***	***	***	***
Subtotal <sup>1</sup>	5.7	7.2	14.3	***	***	***	***	***	***	***	***	***
All other countries <sup>1</sup>	15.0	13.9	17.7	***	***	***	***	***	***	***	***	***
Total imports <sup>1</sup>	20.6	21.2	32.0	***	***	***	***	***	***	***	***	***
U.S. consumption value: Amount	342,727	361,792	351,775	***	***	***	***	***	***	***	***	***
Producers' share <sup>1</sup>	79.6	81.5	73.1	***	***	***	***	***	***	***	***	***
Importers' share:												
Brazil <sup>1</sup>	1.3	1.0	1.8	***	***	***	***	***	***	***	***	***
France <sup>1</sup>	4.5	5.0	8.5	***	***	***	***	***	***	***	***	***
India <sup>1</sup>	0.1	1.0	2.3	***	***	***	***	***	***	***	***	***
Subtotal <sup>1</sup>	5.9	6.9	12.6	***	***	***	***	***	***	***	***	***
All other countries <sup>1</sup>	14.5	11.5	14.3	***	***	***	***	***	***	***	***	***
Total imports <sup>1</sup>	20.4	18.5	26.9	***	***	***	***	***	***	***	***	***

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**Table I-1--Continued**  
**SSWR: Summary data from the original investigations, the first reviews, and the current reviews, 1990-92, 1997-99, and 2000-05**

(Quantity=short tons; value=1,000 dollars; unit values, unit labor costs, and unit financial data are per short ton)

Item	1990	1991	1992	1997	1998	1999	2000	2001	2002	2003	2004	2005
<b>U.S. imports from-</b>												
<b>Brazil:</b>												
Quantity	2,057	1,671	3,368	0	0	0	0	0	0	0	7	0
Value	4,467	3,599	6,434	0	0	0	0	0	0	0	16	0
Unit value	\$2,172	\$2,154	\$1,910	( <sup>a</sup> )	( <sup>a</sup> )	( <sup>a</sup> )	( <sup>a</sup> )	( <sup>a</sup> )	( <sup>a</sup> )	( <sup>a</sup> )	\$2,072	( <sup>a</sup> )
<b>France:</b>												
Quantity	4,547	5,564	11,137	3,153	5,372	6,643	5,546	8,314	6,288	3,720	1,569	1,749
Value	15,467	18,034	29,972	9,041	14,971	16,365	16,001	19,259	16,788	7,771	6,000	8,658
Unit value	\$3,402	\$3,241	\$2,691	\$2,867	\$2,787	\$2,464	\$2,885	\$2,317	\$2,670	\$2,089	\$3,823	\$4,950
<b>India:</b>												
Quantity	97	1,731	4,344	253	24	634	7,815	3,004	4,388	2,232	1,297	278
Value	206	3,490	7,961	542	51	879	13,086	4,886	6,436	3,377	2,745	783
Unit value	\$2,124	\$2,016	\$1,833	\$2,145	\$2,106	\$1,386	\$1,674	\$1,626	\$1,467	\$1,513	\$2,117	\$2,814
<b>Subtotal:</b>												
Quantity	6,701	8,966	18,849	3,406	5,396	7,277	13,362	11,318	10,676	5,952	2,874	2,027
Value	20,140	25,123	44,367	9,583	15,022	17,244	29,088	24,146	23,224	11,148	8,761	9,441
Unit value	\$3,006	\$2,802	\$2,354	\$2,814	\$2,784	\$2,370	\$2,177	\$2,133	\$2,175	\$1,873	\$3,049	\$4,657
<b>All other countries:</b>												
Quantity	17,642	17,265	23,251	77,429	56,722	58,722	68,882	50,969	47,618	29,533	44,734	39,503
Value	49,791	41,642	50,171	160,477	114,321	96,514	127,792	88,258	76,754	52,654	102,959	107,064
Unit value	\$2,822	\$2,412	\$2,158	\$2,073	\$2,015	\$1,644	\$1,855	\$1,732	\$1,612	\$1,783	\$2,302	\$2,710

Table continued on next page.

**Table I-1--Continued  
SSWR: Summary data from the original investigations, the first reviews, and the current reviews, 1990-92, 1997-99, and 2000-05**

(Quantity=short tons; value=1,000 dollars; unit values, unit labor costs, and unit financial data are per short ton)

Item	1990	1991	1992	1997	1998	1999	2000	2001	2002	2003	2004	2005
<b>All countries:</b>												
Quantity	24,343	26,231	42,100	80,835	62,118	65,999	82,243	62,287	58,294	35,485	47,608	41,531
Value	69,931	66,765	94,538	170,060	129,343	113,758	156,879	112,403	99,978	63,802	111,720	116,505
Unit value	\$2,873	\$2,545	\$2,246	\$2,104	\$2,082	\$1,724	\$1,908	\$1,805	\$1,715	\$1,798	\$2,347	\$2,805
<b>U.S. producers'--</b>												
Capacity quantity	251,718	251,696	249,894	***	***	***	***	***	***	***	***	***
Production quantity	91,292	89,499	89,574	***	***	***	***	***	***	***	***	***
Capacity utilization	36.3	35.6	35.8	***	***	***	***	***	***	***	***	***
<b>U.S. shipments:</b>												
Quantity	93,583	97,624	89,421	***	***	***	***	***	***	***	***	***
Value	272,796	295,027	257,237	***	***	***	***	***	***	***	***	***
Unit value	\$2,915	\$3,022	\$2,877	***	***	***	***	***	***	***	***	***
<b>U.S. export shipments:</b>												
Quantity	168	61	43	***	***	***	***	***	***	***	***	***
Value	613	191	133	***	***	***	***	***	***	***	***	***
Unit value	\$3,649	\$3,131	\$3,093	***	***	***	***	***	***	***	***	***
Ending inventory quantity	7,582	3,047	3,158	***	***	***	***	***	***	***	***	***
Inventories/total shipments <sup>1</sup>	8.1	3.1	3.5	***	***	***	***	***	***	***	***	***
Production workers	1,257	1,296	1,378	***	***	***	***	***	***	***	***	***
Hours worked (1,000 hours)	2,606	2,604	2,726	***	***	***	***	***	***	***	***	***

Table continued on next page.

Table I-1--Continued  
SSWR: Summary data from the original investigations, the first reviews, 1990-92, 1997-99, and 2000-05

(Quantity=short tons; value=1,000 dollars; unit values, unit labor costs, and unit financial data are per short ton)

Item	1990	1991	1992	1997	1998	1999	2000	2001	2002	2003	2004	2005
Wages paid (1,000 dollars)	61,294	64,691	69,653	***	***	***	***	***	***	***	***	***
Hourly wages	\$23.52	\$24.84	\$25.55	***	***	***	***	***	***	***	***	***
Productivity (tons per hour)	35.0	34.4	32.9	***	***	***	***	***	***	***	***	***
Unit labor costs	\$671	\$723	\$778	***	***	***	***	***	***	***	***	***
Net sales:												
Quantity	74,080	79,398	81,298	***	***	***	***	***	***	***	***	***
Value	250,215	264,903	252,014	***	***	***	***	***	***	***	***	***
Unit value	\$3,378	\$3,336	\$3,100	***	***	***	***	***	***	***	***	***
Cost of goods sold	218,759	237,099	246,815	***	***	***	***	***	***	***	***	***
Gross profit or (loss)	31,456	27,804	5,199	***	***	***	***	***	***	***	***	***
SG&A expenses	19,172	18,671	20,239	***	***	***	***	***	***	***	***	***
Operating income or (loss)	12,284	9,133	(15,040)	***	***	***	***	***	***	***	***	***
Capital expenditures	15,463	16,988	10,087	***	***	***	***	***	***	***	***	***
Unit cost of goods sold	\$2,953	\$2,986	\$3,036	***	***	***	***	***	***	***	***	***
Unit SG&A expenses	\$259	\$235	\$249	***	***	***	***	***	***	***	***	***
Unit operating income or (loss)	\$166	\$115	(\$185)	***	***	***	***	***	***	***	***	***
Cost of goods sold/sales <sup>1</sup>	87.4	89.5	97.9	***	***	***	***	***	***	***	***	***
Operating income or (loss)/sales <sup>2</sup>	4.9	3.4	(6.0)	***	***	***	***	***	***	***	***	***

<sup>1</sup> In percent.

<sup>2</sup> Less than 0.05 percent.

<sup>3</sup> Not applicable.

Note.--Because of rounding, figures may not add to the totals shown. Official Commerce statistics report imports from Brazil of 2,663 short tons with an average unit value of \$418 per short ton in 2000, however, there were no reported duties applied to entries from Brazil in 2000 according to \*\*\* and official Brazilian statistics show no exports to the United States. As discussed in the section of this report entitled "Commerce's Reviews," Commerce revoked the antidumping duty order on SSWR manufactured and exported by the Viraj Group and terminated suspension of liquidation for entries on or after December 1, 2003. Data treating the Viraj Groups' import entries for this period as nonsubject imports are presented in table C-2.

Source: Compiled from the confidential report in the first reviews (memorandum INV-X-133, June 16, 2000), from data submitted in response to Commission questionnaires, and from official Commerce statistics, and from proprietary data from \*\*\*.

**APPENDIX D**  
**PURCHASER QUESTIONNAIRE RESPONSES**





As part of their response to the notice of institution, interested parties were asked to provide a list of three to five leading purchasers in the U.S. market for the domestic like product. A response was received from domestic interested parties and it named the following three firms as top purchasers of stainless steel wire rod: \*\*\*. Purchaser questionnaires were sent to these three firms. No firms provided responses to the following questions:

1. Have there been any significant changes in the supply and demand conditions for stainless steel wire rod that have occurred in the United States or in the market for stainless steel wire rod in India since January 1, 2016?
2. Do you anticipate any significant changes in the supply and demand conditions for stainless steel wire rod in the United States or in the market for stainless steel wire rod in India within a reasonably foreseeable time?

